



West Bengal State Electricity Distribution Company Limited

(A Government of West Bengal Enterprise)

Vidyut Bhavan (7th floor) DJ Block, Sec-II Salt Lake, Kolkata- 700 091

CIN: U40109WB2007SGC113473, Web: www.wbsedcl.in,

e-mail: cereg.wbsedcl@gmail.com

Telephones : 2359-8391, Extn - 364 Fax: 033-2334-5862

Regulation Cell

Memo No-REG/Legal/CERC/ 54

Dated: 15/02/2022

To
The Secretary,
Central Electricity Regulatory Commission,
3rd & 4th Floor, Chanderlok Building,
36, Janpath, New Delhi-110001.

Sub: Comments on draft CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021.

Ref: Memo No. L-1/261/2021/CERC Dated: 14th January, 2022 of Secretary CERC.

Respected Sir,

With reference to the above, comments/ suggestions of WBSEDCL are enclosed herewith for your consideration, please.

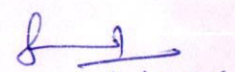
Encl: As above

Yours faithfully,

(S. Mukhopadhyay)
Chief Engineer (Reg)

Observation of WBSEDCL on draft CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021

Clause No.	As per Draft Regulation	Amendment proposed	Reason
17.1 (ii) & (iii)	(ii) A buying entity connected to intra-State transmission system; (iii) A distribution licensee or a Bulk consumer, seeking to connect to ISTS, directly, with a load of 50 MW and above;	(ii) A buying entity connected to intra-State transmission system <u>for the quantum and period having Transmission Service Agreement (TSA) with STU;</u> (iii) A distribution licensee or a Bulk consumer, seeking to connect to ISTS, directly, with a load of 50 MW and above <u>subject to having TSA with STU for the same quantum & period;</u>	Optimum use of STU network and realization of STU charge, proper state transmission system planning commensurate with applied GNA.
18.1 (a)	(a) GNA for a (i) State including intra-State entity(ies) and (ii) other drawee entities, shall be the average of "A" for the financial years 2018- 19, 2019-20 and 2020-21: where,...	(a) GNA for a (i) State including intra-State entity(ies) and (ii) other drawee entities, shall be the average of "A" for <u>preceding 03 (three) the financial years before the FY of the implementation of this Regulation 2018- 19, 2019-20 and 2020-21 and revised each year for subsequent year on the basis of last three FYs: where,...</u>	To keep the GNA dynamic and adjustment on yearly basis and it will also help in the transmission planning.
18.1 (e)	(e) GNA deemed to have been granted to STU under clause(d) of this Regulation, shall be segregated for each intra-State entity, including distribution licensee, by the respective SLDC, and intimated to STU, Nodal Agency and NLDC within 1 month of publication of	(e) GNA deemed to have been granted to STU under clause(d) of this Regulation, shall be segregated for each intra-State entity, including distribution licensee, by the respective SLDC, and intimated to STU, Nodal Agency and NLDC within 1 month of publication of details by the Nodal	To ensure applicability of GNA to each interstate entity by SLDC. After implementation of GNA, State as a whole will be the beneficiary of CTU as the GNA quantum will be derived on the basis of the


15/2/2021

Chief Engineer (Regulation)
Regulation Department
WBSEDCL