



भारतसरकार  
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केंद्रीयविद्युत्प्राधिकरण  
Central Electricity Authority  
पश्चिमक्षेत्रीयविद्युत्समिति



**Western Regional Power Committee**

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To,

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

विषय: सीईआरसी (इंटर-स्टेट ट्रांसमिशन सिस्टम के लिए कनेक्टिविटी और जनरल नेटवर्क एक्सेस) विनियम, 2021 के वि प्रा, पश्चिमी क्षेत्रीय विद्युत समिति (डब्ल्यू आर पी सी) की टिप्पणियां - के संबंध में।

Subject: Comments of Western Regional Power Committee (WRPC) secretariat on the Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021 - regarding

Respected Sir,

Comments of Western Regional Power Committee (WRPC) secretariat on the Draft Connectivity and General Network Access to the inter-State Transmission System Regulations, 2021, issued vide No. L-1/261/2021/CERC dated 16.12.2021, are as follows;

1. The Connectivity and General Network Access to the Inter-State Transmission System) Regulations, 2021 (CGNA) are required to be aligned with the principles adopted in the planning of the ISTS network for its users and the methodology adopted for payments of charges of such transmission assets put into services. The policy framework should be such that with the evolving challenges in the grid such as RE integration, the issues which crop up are tackled with uniformity and constant policy which promotes confidence of all the stake holders. Different philosophies in different regulations add to complexities in implementation.

Therefore in our opinion the GNA concept needs to be in line with the transmission planning principles and Sharing of Transmission Charges and Losses regulations. The Central Electricity Regulatory Commission (Sharing of



Inter-State Transmission Charges and Losses) Regulations, 2020 and IEGC needs to be amended suitable along with the CGNA regulations. Also while adopting the CGNA concept, the principles adopted in the Transmission planning should be aligned with the CGNA.

## **2. Deemed Granted GNA :**

- a) The policy of the Government of India is to promote RE adoption in the country with a target of 175 GW of renewable energy to be achieved by 2022. Ministry of Power has granted waiver of Inter-State transmission charges on the transmission of the electricity generated from solar and wind sources of energy vide their letter No,23/12/2016-R&R-Part (1) [239444]. This waiver is accorded till 30<sup>th</sup> June 2025. Keeping in mind the above waiver several DISCOMs have signed PPAs with the RE generators for power. However, if these LTAs (waived from payment of transmission charges) are considered in the granted GNA of State, it would mean that there is no exemption of the transmission charges, and the charges have to be borne by the respective State and therefore it will give a wrong signal to States who are willing to execute PPAs with RE Generators in the future.

**In our opinion the exempted RE transmission assets cost should be distributed among all the users, thereby socializing such assets and such LTA included/considered as a part of deemed granted GNA should be excluded from the granted GNA quantum of the State. As the peak drawl of the States considered while computing the GNA, would also include such LTAs.**

- b) There are several Embedded Entities in States in Western Region such as RGPPL, SSP, PENCH, Taps 1&2. These entities are connected to the intra State network of the State they are situated in. These generators have share of power with more than one State therefore they are treated ISGS, and the control lies with the WLDC for scheduling purposes. Since the generators are treated as ISGS the drawl of power from lines emanating from these stations are added in the State's drawl. Even though the States own transmission system used for evacuation of power from these stations, the drawl is considered as State's drawl for arriving at the GNA granted.

**Therefore, the drawl data considered in the Annexure – 1 of regulation includes this power also. In our opinion, it should be removed from the drawl of the State.**



- c) As per the Chapter 4, Regulation 17.1(i) of the draft Regulations, the State Transmission utilities are granted GNA as per the methodology provided in Regulation 18.1 and is considered as Deemed Grant of GNA. The Annexure – 1 of the draft Regulations has provided the quantum of GNA which will be deemed granted to the STUs as per regulation 18.1. The methodology adopted for calculating the deemed grant of GNA is based on the average of 3 years of  $0.5 \times \text{one block drawl} + 0.5 \times \text{monthly average of peak day drawl}$  of each year. The peak drawl of State essentially consists of drawl against LTOA + MTOA + STOA + Power Exchange and RE LTA exempted. It is required to ascertain whether the transmission corridor equivalent to the granted GNA is always available to the State under all load- generation seasonal scenarios. It is also required to check whether the States have been issued warning/notices for restricting their drawl during the blocks/period which are consideration in the arriving at the deemed granted GNA. This will ensure the granted GNA corridor can be scheduled by the States under various load Generation scenarios and there will not be any constraint on the use of this corridor quantum (deemed granted GNA quantum) by States.

**The transmission assets have traditionally been planned and put into service based on the LTA commitments of the States and therefore in our opinion for the States the granted GNA should be LTA of the State, to start with. One time chance of getting additional GNA may be given to States at the time of transition, after it has been examined by the system planner.**

### **3) System planning and allocation of GNA :**

The system planning and asset creation is based on the commitment by the users, therefore traditionally the system is developed based on the LTA commitments of the Generator and Beneficiaries. This ensures that the transmission assets planned as above would be optimally utilized. Therefore, beneficiaries applying for additional GNA without identified injection would result in planning of the system difficult and creating assets which will remain stranded for most part of the time. Additionally, these lightly loaded lines would result in over voltage issues, which is always severe at present situation.

**The Generators and Beneficiaries who apply for grant of GNA/additional GNA may be asked to give the target area of drawl/injection. This will help in identification of incremental loads of a State for a given generation and**



**incremental generation of a Generating Station for a given State for optimal planning of the Transmission assets.**

**4) T-GNA :**

As per regulation 28.2, the charges for the application of the T-GNA are provided as one time charge of non refundable fee of Rupees five thousand (Rs. 5000). The same is for both category of the T-GNA i.e., Advance application and Exigency application. This creates the impression that any entity may apply for any kind of T-GNA at any time. There is a need to promote GNA and have restrictions on T-GNA under both advance application and exigency application which can only be availed for meeting short time peaks and contingencies. Further there is a need to differentiate between both advanced application and exigency applications also. The advanced application should be promoted more than exigency.

**Therefore, cost to the users for the GNAs should be such that the price of T-GNA (Exigency application) > T-GNA (Advance application) > GNA. The above differentiation is required so that entities are dissuaded to apply for T-GNA every now and then and this product may be used by them in exigencies.**

**Assumption: Sharing of transmission charges methodology and RTDA will not change, only change being LTA & MTOA will be replaced by GNA in the Sharing Regulations, 2020.**

These are the comments of WRPC secretariat and not WRPC on the Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021.

भवदीय /Yours faithfully

(Satyanarayan. S)

सदस्य सचिव/ Member Secretary