Comments of APDiscoms on draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the Inter-state Transmission system) (1st Ammendment) Regulations, 2023

Sl. No	Clause No.	Existing Clause	Draft Modification	Remarks
1	20.4	NA	Entities covered under clause (iii) of Regulation 17.1 of these regulations shall be eligible to apply for GNA to draw power only from renewable sources as identified at clause (2) of the Regulation 13 of the Sharing Regulations. Such GNA shall be called as GNA$_{RE}$ for purpose of calculation of transmission charges in accordance with the Sharing Regulations. For purpose of these regulations GNA$_{RE}$ shall be same as GNA: Provided that if such an entity with GNA$_{RE}$ intends to draw power from the sources other than the sources identified at clause (2) of the Regulation 13 of the Sharing Regulations, it may: (a) apply for grant of additional GNA; or (b) it may convert GNA$_{RE}$ into GNA by making an application to the Nodal agency	The entities covered under clause (i) of regulation 17.1 i.e STU on behalf of distribution licensees should be given the opportunity to declare the GNA-RE quantum from their existing GNA quantum, equal to the LTA quantum of power that is already being exempted as per regulation 13 of the sharing regulations.
2	25.1	For an entity covered under Regulation 17.1, GNA once granted can be	For an entity covered under Clauses (i) to (v) of Regulation 17.1, GNA once granted can be	The notice period of one (1) year for relinquishment of GNA is very high. It is not

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		relinquished with a notice of 30 days to the Nodal Agency, in full or in part, on payment of relinquishment charges in advance as per following:	relinquished, in full or in parts, with a notice of one year to the Nodal Agency, along with a fee of fifty lac rupees(which will be adjusted from the relinquishment charges) as per following:"	practically feasible for the beneficiaries to determine the GNA to be relinquished one year prior to the effective date. The notice period for relinquishment of GNA shall be reduced to three (3) months.
3	25	For an entity covered under clause (i) of Regulation 17.1 of these regulations, STU may relinquish GNA on behalf of identified intra-State entity. The relinquishment charges shall be equal to 24 times the transmission charges paid by such intra-State entity for the last billing month under the Sharing Regulations, corresponding to the relinquished quantum.	The number "24" shall be substituted with number "18" in clauses (a) and (b) of Regulation 25.1 of the Principal Regulations	1. It is requested that the Entities may be given one time opportunity to declare their GNA for the first time and the relinquishment charges may be levied from there on. 2. The relinquishment charges may be reduced to a maximum of 6 times (6 months period) the transmission charges paid by such intra-State entity for the last billing month under sharing regulations corresponding to the relinquished quantum.
4	Annexure (2)	NA	NLDC shall calculate the quantum of ISTS drawl blockwise as "Direct drawl" for years 2018-19,2019-2020 and 2020-2021: 'Direct drawal'= Lower of Actual ISTS drawal through STU feeders	The GNA quantum for each entity was calculated by CERC by considering the averages of PEAK drawals of each Entity from ISTS. Hence it is requested that, in similar lines, The ISTS drawal through the

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			connected to identified generating station or drawal schedule of the State from such generating station for corresponding block.	STU network may be calculated as follows: Direct drawal = highest of Actual ISTS drawal through STU feeders connected to identified generating station or drawal schedule of the State from such generating station for corresponding block. Considering the peak drawls for GNA but lower of actual or schedules for exemption (GNAd) is not reasonable.