



**BSES Yamuna Power Limited**

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Ref No: RA/BYPL/2022-23/326

Date: 27.02.2023

To,

The Secretary,  
Central Electricity Regulatory Commission,  
Third Floor, Chanderlok Building,  
36, Janpath, New Delhi-110001

**Sub: Draft Notification on draft CERC (Connectivity and General Network Access to the inter-State Transmission System) (First Amendment) Regulations, 2023.**

**Ref: No. Hon'ble CERC's Public Notice No. L-1/261/2021/CERC dated 27.01.2023 & 16.02.2023.**


Sir,

We write in reference to the aforesaid Public Notice, wherein comments have been sought from the stakeholders.

Accordingly, BYPL comments on the same are enclosed as Annexure-A for kind consideration of the Hon'ble Commission.

Thanking You,

Yours faithfully  
**For BSES Yamuna Power Limited**

  
Sameer Singh  
(Authorized Signatory)

Encl: As above

**BYPL Comments on Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) (First Amendment) Regulations, 2023**

Sr No.	CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2022.	Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) (First Amendment) Regulations, 2023	BYPL Comment
1	<b>18 Deemed Grant of GNA</b>	<p>14.1. A new Regulation, namely, Regulation 18.3 shall be added after Regulation 18.2 of the Principal Regulations as under:</p> <p>“18.3 For a host State in which a regional generating station is located, and is connected only to STU system or connected to both STU system and ISTS, the GNA quantum at Annexure-I shall be reduced by the GNA quantum calculated based on the methodology specified in Annexure-II to these Regulations.”</p>	Bawana CCGT station is an existing Regional Station and is connected to STU of Delhi only. So it should be taken into account to compute "Direct Drawal" of Delhi and should appropriately be considered in Annexure-I & II.

Sr No.	CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2022.	Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) (First Amendment) Regulations, 2023	BYPL Comment
2	<p><b>25. Relinquishment of GNA</b>  25.1 For an entity covered under Regulation 17.1, GNA once granted can be 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:</p> <p>(a) 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.</p> <p>(b) For an entity covered under clauses (ii) to (iv) of Regulation 17.1 of these regulations, the relinquishment charges shall be equal to 24 times, the transmission charges paid by such entity for the last month under the Sharing regulations, corresponding to the relinquished quantum.</p> <p>Provided that, if the balance period of GNA is less than 24 months, the</p>	<p>20.1. Regulation 25.1 (except clauses(a) to (d)) of the Principal Regulations shall be substituted as follows:  “25.1 For an entity covered under Clauses (i) to (v) of Regulation 17.1, GNA once granted can be 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:”</p> <p>20.2. The number “24” shall be substituted with number “18” in clauses (a) and (b) of Regulation 25.1 of the Principal Regulations</p> <p>20.5. New clause, namely, clause (e) shall be added after clause (d) to the Regulation</p> <p>25.1 of the Principal Regulations as under:  “(e) Relinquishment charges shall be paid one month prior to effective date of relinquishment failing which relinquishment shall not be effective.”</p>	<p>As per the proposed draft Regulations, GNA once granted can be relinquished, in full or in parts, with a notice period of One Year. As during the said notice period GNA grantees shall be paying monthly GNA charges under Sharing Regulation, additional liability of Relinquishment charges equal to 18 times the monthly transmission charges is not justifiable. Therefore along with notice period there should be no relinquishment charges liability on GNA grantees.</p>

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	<p>relinquishment charges shall be equal to the number of balance months times the transmission charges paid by such entity for the last month under the Sharing Regulations, corresponding to the relinquished quantum.</p> <p>(c) Relinquishment charges received under clauses (a) and (b) of this Regulation shall be used for reducing Monthly Transmission Charges under the Sharing Regulations.</p> <p>(d) On relinquishment of full quantum of GNA by entity covered under clause (iii) of Regulation 17.1 of these regulations, such entity shall be disconnected from the grid.</p>		

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3		<p><b>29. New Annexure-II - Methodology to determine 'Direct drawl' by a State from a regional entity generating station:</b></p> <p>29.1. A new Annexure-II shall be added after the Annexure-I to the Principal Regulations as under:</p> <p>b) For regional entity generating stations which are yet to be connected to STU and ISTS or only STU system as on coming into force of these regulations.</p> <p>vi. For all other purposes including scheduling of power from such identified generating station by RLDC to the host State, GNA quantum equal to Connectivity with STU system shall be considered which shall not considered for billing under Sharing Regulations.”</p>	<p>Clarification required regarding consideration of GNA quantum for billing as per sharing regulation ie GNA as per Annexure-I or GNAd as per sub clause a)(v) of Annexure-II</p>