



**CAPTIVE POWER PRODUCERS ASSOCIATION (Registered
U/sec. 25 of Company Act 1956 & Certificate of IT 12AA CIN:
U91990MH2003GAP141611)**

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Vikas Patangia
PRESIDENT

To,

Date : 17 February, 2023

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

**Comments on proposed Central Electricity Regulatory Commission
(Connectivity and General Network Access to the inter-State Transmission
System) (First Amendment) Regulations, 2023.**

Dear Sir,

Captive Power Producers Association (“CPPA”) is representing the interest of Industries in various States and UTs having captive power plants at their industries in fulfilling the energy requirement of their industries through captively produced power having Captive generation plants.

In response to some of the proposed Regulations, we would like to submit our comments as per **Annexure – I**.

We request you to consider our comments while finalising the amendment.

Thanking you.

**Yours faithfully,
For Captive Power Producers Association:**

CPPA - Comments/suggestions on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (First Amendment) Regulations, 2023

SL. No.	Regulation	Proposed amendment	Amendment suggested	Rational for Comments/Suggestions
1.	New addition 5.8 (xi)	Documents to be submitted while making connectivity applications	<p>There should not be any requirement to submit Land ownership and capital cost expenditure document at the time of Application when application is made by REGS/ESS who are not supplying power to DISCOM/Implementing Agency.</p> <p>Instead, requirement of submission of such document should be covered under Regulation 9.3, post approval of the connectivity.</p>	<p>The REGS / ESS who are not entering in to PPA with DISCOM / implementing agency are required to submit the proof of 50% of land in possession and expenditure of 10% of total cost of project.</p> <p>To consider REGS / ESS developer at par with developers entering into PPA with DISCOM / Implementing Agency, there should not be any such requirement for REGS/ESS who are not supplying power to DISCOMs/Implementing Agency.</p>
2.	15.1, new second proviso	Utilization of GNA by subsidiary companies.	<p>The proviso should be modified as:</p> <p><i>Provided further that where a bulk consumer has been granted GNA under Regulation 17.1(iii) seeking to connect to ISTS directly, GNA granted to such Bulk consumer may be utilized in part or full by its Parent and /or subsidiaries</i></p> <p>Please add words <u>Parent and /or</u> as mentioned above.</p>	<p>In line with first proviso of Regulation 15.1, it is requested to provide the flexibility for use of GNA by a parent company or subsidiary(ies) company or both as similar flexibility is granted to Generators.</p>

SL. No.	Regulation	Proposed amendment	Amendment suggested	Rational for Comments/Suggestions
3.	20.4	GNA for RE	<p>Please add entity covered under clause (ii) of Regulation 17.2 as eligible entity and the proposed Regulation may be amended as below:</p> <p><i>Entities covered under clause (ii) and (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 GNARE for purpose of calculation of transmission charges in accordance with the Sharing Regulations. For purpose of these regulations GNARE shall be same as GNA</i></p>	<p>Clause (ii) of Regulation 17.1 covers drawee entities connected to intra-state transmission system and intending to use Inter-State Transmission system.</p> <p>Such drawee entities are also eligible to get ISTS waiver and hence shall be allowed the benefits of ISTS waiver in accordance with the Sharing Regulations.</p>
4.	20.4	GNA for RE	<p>Proviso may be amended to :</p> <p><i>Provided that if such an entity with GNARE 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:</i></p> <p><i>(a) apply for grant of additional GNA; or</i></p> <p><i>(b) it may convert GNARE into GNA by making an application to the Nodal Agency and may continue to use GNA for RE power. In such case the ISTS waiver benefit shall be available as per Regulation 13 (1) or (2) of the Sharing Regulations.</i></p>	<p>GNARE grantee may want to utilize the GNA partly for RE during different time period of day and partly for conventional power during balance period of day within same GNA quantum so as to get RTC power. In such cases, the benefit of ISTS waiver shall be allowed as per Sharing Regulation.</p>

SL. No.	Regulation	Proposed amendment	Amendment suggested	Rational for Comments/Suggestions
			<p>Add the text in bold to bring clarity in application of waiver of ISTS charges.</p>	
5.	26.4	T-GNA for RE	<p>Please add entity specified in sub-clause (iii) under Clause (a) of Regulation 26.1 as eligible entity and the Regulation 26.4 may be amended as below:</p> <p><i>Entities covered under sub-clauses (i), and (ii) and (iii) to clause (a) of Regulation 26.1 of these regulations shall be eligible to apply for T-GNA to draw power only from renewable sources as identified at clause (2) of the Regulation 13 of the Sharing Regulations. Such T-GNA shall be called as T-GNARE for purpose of calculation of transmission charges in accordance with the Sharing Regulations. For purpose of these regulations T-GNARE shall be same as GNA</i></p>	<p>Sub-clause (iii) under Clause (a) of Regulation 26.1 covers drawee entities connected to intra-state transmission system or distribution system and intending to use Inter-State Transmission system.</p> <p>Such drawee entities are also eligible to get ISTS waiver and hence shall be allowed the benefits of ISTS waiver in accordance with the Sharing Regulations.</p>
6.	26.4	T-GNA for RE	<p>Proviso may be amended to :</p> <p><i>Provided that if such an entity with T-GNARE 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:</i></p> <p><i>(a) apply for grant of additional T-GNA; or</i></p> <p><i>(b) it may convert T-GNARE into T-GNA by making an application to the Nodal Agency and may continue to use T-GNA for RE power. In such case the ISTS waiver benefit shall be available as per Regulation</i></p>	<p>T-GNARE grantee may want to utilize the GNA partly for RE during different time period of day and partly for conventional power during balance period of day within same T-GNA quantum so as to get RTC power. In such cases, the benefit of ISTS waiver shall be allowed as per Sharing Regulation.</p>

SL. No.	Regulation	Proposed amendment	Amendment suggested	Rational for Comments/Suggestions
			<p>13 (1) or (2) of the Sharing Regulations.</p> <p>Please add the text in bold for clarity in applicability of ISTS waiver.</p>	
7.	New proposal	New proposal	<p>Connectivity to Bulk Consumer:</p> <p>As per current Regulation, Bulk consumer having load of 50 MW and above are eligible to get CTU connectivity (Regulation 17.1 (iii)).</p> <p>It is suggested that such consumer shall be allowed to make separate application for getting connectivity alone.</p>	<p>As per current requirement, bulk consumer can make application only for GNA, there is no provision for making connectivity application.</p> <p>Such provision deny right to bulk consumer to use T-GNA as connectivity will not be granted under T-GNA.</p> <p>Also considering the requirement to construct dedicated line / augmentation, there will be uncertainty in date of completion and this may result in payment of GNA charges if the connectivity infrastructure is not ready.</p> <p>Such bulk consumer shall be allowed to keep physical connectivity (built at own cost) without need to keep GNA so as to give them flexibility in utilisation of connectivity and GNA basis their requirement.</p>