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(भारत सरकार का उद्यम)  
GRID CONTROLLER OF INDIA LIMITED  
(A Government of India Enterprise)



[formerly Power System Operation Corporation Limited (POSOCO)]  
राष्ट्रीय भार प्रेषण केन्द्र / National Load Despatch Centre

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दिनांक: 27<sup>th</sup> February, 2023

सेवा में,

सचिव

केंद्रीय विद्युत् विनियामक आयोग

तृतीय एवं चतुर्थ तल, चंद्रलोक भवन, 36 जनपथ, नई दिल्ली-110001

**विषय:** Connectivity and General Network Access to inter-state Transmission System  
(First Ammendment) Regulations, 2023.

**संदर्भ:** CERC Public Notice no. L-1/261/2021/CERC dated 27<sup>th</sup> January 2023

महोदय,

With reference to the above, the Grid-India suggestions on Connectivity and General Network Access to inter-state Transmission System (First Ammendment) Regulations, 2023 is enclosed at Annexure for kind consideration of the Hon'ble Commision .

सादर धन्यवाद,

भवदीय,

(S C Saxena)  
Executive Director  
NLDC

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

**Suggestions on behalf of RLDCs/NLDC**

**1. Regulation 34.2:**

The Regulation 34.2 provides as follows:

*“Transmission charges for T-GNA, in case of bilateral and collective transactions, shall be payable only at point of drawal, as per the last published Transmission charge rate for T-GNA for the State where such point of drawal is located:*

*Provided that under collective transactions, transmission charges for T- GNA shall be payable for drawal schedules more than GNA quantum or T-GNA quantum or both, as applicable.*

*Explanation: In order to determine whether drawl schedule was more than GNA quantum or T-GNA quantum or both in case of collective transaction, SLDC shall furnish to NLDC, each intra-state entity-wise detail of schedule under GNA or T-GNA, as the case may be. NLDC shall issue power exchange wise and entity-wise segregation of payable T-GNA charges”*

The applicability of transmission charge on any entity for collective transaction as provided in the Regulation 34.2, depends upon the scheduled drawl quantum of other entities in the state under GNA and T-GNA. Accordingly, if other entities draw more, the concerned entity may have to pay transmission charges and vice versa. The apportionment of the charges on the respective intrastate entities inside the state is the responsibility of the concerned SLDC. Necessary infrastructure in many states is yet to be implemented for the intimation of schedule vs TGNA and/or GNA grant of intra state entities within 1 day of transaction. The delay in updating scheduling quantum by SLDC for the intra state entities will delay the process of collection of transmission charges as per GNA regulation.

As per the extant GNA regulations, for drawal under any category (Long Term/Medium Term/Short Term), within GNA and T-GNA quantum no transmission charges are applicable. Further, as mentioned above, the charge payable by an entity are dependent on other entities. The application of transmission charge on post facto basis is not conducive to efficient operations of the electricity market, particularly in Power Exchange market. The transmission charges should be known upfront by the market participants to take informed decisions. In order to facilitate efficient operation of the market, upfront charges may be made applicable for participation in STOA and suitable credit/adjustment/refund may be made against

the total transmission charges payable by the entity as per the GNA quantum by CTU. This would facilitate efficient operation of market. Accordingly, the following change is proposed:

~~*"Provided that under collective transactions, transmission charges for T- GNA shall be payable for drawal schedules more than GNA quantum or T-GNA quantum or both, as applicable."*~~

The above proviso may be replaced by the following provision:

*"Provided that under collective transactions, transmission charges for T- GNA shall be payable for drawal schedules as per the last published Transmission charge rate for T-GNA for the State where such point of drawal is located."*

## **2. Computation of Deemed GNA:**

For computation of GNA, data for the years 2018-19,2019-2020 and 2020-2021 has been considered. The Principal GNA Regulation was envisaged to be implemented in 2022 and accordingly the GNA quantum as given in Annexure-I was sufficient. However, during the last 2 years, high demand growth and high demand has been experienced. Accordingly, now that the implementation is going to happen in the year 2023, the data for years 2019-2020, 2020-2021 and 2021-2022 may be considered for computation of the deemed GNA quantum and accordingly Annexure -I may be updated.

## **3. Addition comments/ suggestions:**

As per the principal regulations 29.4, the exigency applications received till 1300 hrs of (S-1) day shall be processed after 1300 hrs on (S-1) day on first-come-first-served basis, and shall be finalised by 1400 hrs of (S-1) day.

As per draft IEGC clause 46.4.b SECURITY CONSTRAINED UNIT COMMITMENT (SCUC), upward revision of requisition by beneficiaries is open from 14:00 Hrs till 1630 hrs of D-1 in case the power plant schedule goes below minimum turndown level for some or all-time blocks of the D day.

Further, it is also provided in GNA regulation that exigency applications received after 1300 hrs of (S-1) day shall be processed within 4-time blocks, on first-come-first-served basis.

The processing of T-GNA applications starts from 14:00 Hrs onwards and is concurrently running with the window for upward revision by the beneficiaries till 16:30 Hrs.

So in this window of 14:00 Hrs to 16:30 Hrs two concurrent changes (approval of T-GNA applications and upward revision of schedules) are happening and thus, it may lead to a situation where:

(a) ascertaining the available transmission margin for upward revision by beneficiaries or for exigency applications becomes difficult.

(b) priority of revisions (which are under Share allocation of MoP or long-term contracts) and approval for T-GNA applications (which are under short-term contracts) is getting mixed up in this concurrent window.

Accordingly, it may so happen, that long term may get curtailed on account of T-GNA or because of non-availability of clarity in the margins, a valid T-GNA application may get rejected.

It is also important to mention here from an implementation standpoint, that scheduling (and revisions) are handled in the Web Based Energy Scheduling System (WBES) and T-GNA applications will be processed in the NOAR.

Further as per draft Grid code the objective of Security Constrained Unit Commitment (SCUC) is to commit or decommit a generating station or unit thereof, for maintaining reserves in the interest of grid security.

The inputs on the above subject matter has already given in suggestions provided on the draft grid code.

Accordingly, the following change is proposed:

29.4. Exigency applications for T-GNA with the schedule for (S) day shall be processed as under:

(a) Applications received till ~~1300~~ 16:30 hrs of (S-1) day shall be processed after ~~1300~~ 16:30 hrs on (S-1) day on first-come-first-served basis, and shall be finalised by ~~1400~~ 17:30 hrs of (S-1) day.

(b) Applications received after ~~1300~~ 16:30 hrs of (S-1) day or in the (S) day shall be processed within 4 time blocks, on first-come-first-served basis.

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