

No: PCKL/DDP-1/ADP-4/CERC/2022-23 / 7755-57 27 FEB 2023

The Secretary,
Central Electricity Regulatory Commission,
3rd and 4th Floor, Chandralok Building,
36, Janpath, New Delhi - 110001.

Sir,

Sub: Submission of Comments/Views on the **Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (First Amendment) Regulations, 2023**

Ref: CERC No. L-1/261/2021/CERC Dated: 27.01.2023

With reference to above, PCKL wish to submit the comments on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (First Amendment) Regulations, 2023 for kind consideration.

1. Amendment to Regulation 15.1 of the Principal Regulation

“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 subsidiaries.”

The above provision allowed for use of GNA by a subsidiary may affect the calculation of PoC charges on AC-UBC amount, since these charges are calculated based on drawal methodology when the subsidiary companies are situated in different States, the AC-UBC amount vary based on drawal of each State. Therefore, it may be deleted.

2. New Regulation 18.3

“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.”

The GNA has been computed considering maximum ISTS drawal in a time block during the year + [average of (maximum ISTS drawal in a time block in a day) during the year]. The GNA arrived considering these factors. Hence, once again reduction of GNA quantum may not be appropriate.

Further, the drawal of the quantum considered for the FY 2018-19, 2019-20 & 2020-21 which is almost a Covid period, the consumption of the industry and commercial offices were shutdown. The demand of the State for the FY 2022-23 as compared to the previous year is much more and all along State is paying LTA quantum. The State of Karnataka has met highest ever demand of 15405 MW on 18.02.2023 which is expected to reach 16000 MW for the FY 2022-23.

Hence, Commission may consider the quantum of drawal for the FY 2022-23 to arrive GNA quantum.

GNA quantum of RE of the State DISCOMs needs to be **added in the total GNA quantum.**

3. Provision to 18.1 Deemed Grant of GNA

“Provided that generating stations connected to the intra-State transmission system where Long Term Access granted to such entity or to its identified buyer, under the Connectivity Regulations, 2009 has become effective, shall be deemed to have been granted GNA equal to the quantum of such Long term Access, under these regulations.”

Entities where connectively granted under long-term access except trading licensee, shall be exempted to have been granted for deemed GNA.

Yours faithfully,


Managing Director, 27/2/23
PCKL, Bengaluru.

Copy Submitted for kind information to:

1. Ps to Additional Chief Secretary to Govt, Energy Department, Vidhana Soudha, Bengaluru.
2. The Managing Director, BESCO, K.R Circle, Bengaluru-560001
3. The Managing Director, HESCO, Navanagar, Hubballi-580025.
4. The Managing Director, GESCOM, Station Main Road, Kalaburgi-585102.
5. The Managing Director, MESCOM, Corporate office, 4th Floor, MESCOM Bhavan, Bejai,Kavoor cross Road, Mangaluru-575004.
6. The Managing Director, CESC, Corporate Office, No. CA-29, Vijaynagar 2nd Stage, Hinakal, Mysuru – 570 017.