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Sent: Friday, February 24, 2023 5:03:13 PM
Subject: Comments of SRPC Secretariat on the Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) (First Amendment) Regulations, 2023

महोदय/महोदया,
Sir/Madam,

Please find attached the Comments of SRPC Secretariat on the Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (First Amendment) Regulations, 2023.

In the e-Regulation Portal of CERC e-filing weblink, we are unable to add the comments since the Date of closure of E-regulation portal is "17/02/2023". Please do the needful.



केन्द्रीय विद्युत विनियामक आयोग Central Electricity Regulatory Commission



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STAKE HOLDER COMMENTS

Regulation No. : L-1/1/2023/CERC

Reference No. : 1/2023

Regulation Details

Reference No.	1/2023	CERC File Number	No. L-1/261/2021/CERC
Regulation No.	L-1/1/2023/CERC	Regulation No. Generation Date	06/02/2023

Regulation Type : Amendment

Regulation Title : Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021

Subject : Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (First Amendment) Regulations, 2023

Date of Closure of E-Regulation Portal : 17/02/2023

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REGULATION DESCRIPTION

30 items found, displaying 1 to 20. [First/Prev] 1, 2 [Next/Last]

Regulation No.	Clause	Sub Clause	Description	Added On	Action
1	0		Short Title and Commencement	06/02/2023	
2	0		Amendment to Regulation 2.1 of the Principal Regulations	06/02/2023	
3	0		Amendment to Regulation 5.2 of the Principal Regulations	06/02/2023	
4	0		Amendment to Regulation 5.8 of the Principal Regulations	06/02/2023	
5	0		Amendment to Regulation 7.1 and 7.2 of the Principal Regulations	06/02/2023	
6	0		Amendment to Regulation 8.2 of the Principal Regulations	06/02/2023	
7	0		Amendment to Regulation 8.3 of the Principal Regulations	06/02/2023	
8	0		New Regulation 9.3	06/02/2023	
9	0		Amendment to Regulation 15.1 of the Principal Regulations	06/02/2023	

सादर / With Regards,

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SRPC Secretariat’s Comments on the Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (First Amendment) Regulations, 2023

Sl No	Provisions/ Items in the Draft Regulations	Existing	Modification Suggested	Remarks
1	9. Amendment to Regulation 15.1 of the Principal Regulations:	9.2. A new proviso shall be added after the first proviso to the Regulation 15.1 of the Principal Regulations as under: “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 Regulation 15 pertains to <i>Transfer of Connectivity</i> . The connectivity as per the GNA Regulations is to be given for injection entities. But the new provision envisages about the usage of GNA of drawee entity covered under Regulation 17. Hence the proposed provision may be placed appropriately (may be under Regulation 17 of Principal Regulations)	
2	12. Amendment to Regulation 17.1 of the Principal Regulations:	12.1. A new clause, namely, (vi) shall be added after the clause (v) to the Regulation 17.1 of the Principal Regulations as under: “(vi) An injecting entity which is granted Connectivity to intra-State transmission system and seeking GNA for purpose of injection into ISTS.”	As per the GNA Regulations, GNA to be granted for the drawee entities and for the Injection entities, connectivity is envisaged. As per the Regulation 4.3 of Principal Regulations, a generating station, already connected to or intending to connect to intra-State transmission system shall also be eligible as an Applicant for Connectivity. Hence, this proposed provision may be added under Regulation 4.3 of Principal Regulations with the following modifications:. 4.3. A generating station/ injecting entity , already connected to or intending to connect to intra-State transmission system shall also be eligible as an Applicant for Connectivity.	
3	16. New Regulation 20.4 21. New Regulation 26.4	“20.4 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	In case of Hybrid cases like entities having both GNA and GNA _{RE} , more clarity on waiver of transmission charges in respect of drawee DICs which have obtained GNA and GNA _{RE} because sources identified under clause (2) of the Regulation 13 of the Sharing Regulations may be eligible for waiver for GNA and GNA _{RE} . So, the source of clause (2) of the Regulation 13 of the Sharing Regulations needs to be segregated under GNA and GNA _{RE} . The same is	

		<p>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: </p> <p>“26.4 Entities covered under sub-clauses (i) and (ii) 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-GNA_{RE} for purpose of calculation of transmission charges in accordance with the Sharing Regulations. For purpose of these regulations T-GNA_{RE} shall be same as GNA:</p>	<p>applicable for T-GNA and T-GNA_{RE}.</p>	
4	<p>Annexure-II: Methodology to determine ‘Direct drawl’ by a State from a regional entity generating station</p>	<p>a) For regional entity generating stations already connected to STU and ISTS or only STU system as on the date of coming into force of these regulations, ISTS drawal data as considered under Regulation 18.1 for host State where such generating station is located shall be reduced to factor in the direct drawl by State, based on the following methodology:</p> <p>ii. CTU shall provide a list of such generating stations to NLDC within a week of coming into effect of these Regulations.</p> <p>.....</p>	<p>ii. CTU shall provide a list of such generating stations along with the STU network planned and implemented to evacuate State’s share of power from such generating station at the time of commissioning of the concerned generating station (as per a(i)) to NLDC within a week of coming into effect of these Regulations.</p>	<p>CTU shall provide the details of network planned/implemented at the time of commissioning of such GS to NLDC.</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>iii. CTU shall identify such generating station and inform NLDC.</p>	<p>iii. CTU shall identify such generating station and inform NLDC along with the details of STU/ISTS network (as per b(i)).</p>	
5	<p>Annexure-II: Methodology to determine 'Direct drawl' by a State from a regional entity generating station</p>	<p>a. iii. NLDC shall calculate the quantum of ISTS drawl blockwise as "Direct drawl" for years 2018-19,2019-2020 and 2020-2021: 'Direct drawl'= Lower 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.</p> <p>.....</p>	<p>'Direct drawal'= Lower of Actual ISTS drawal through STU feeders (as per sub-clause (i) of this Regulation) connected to identified generating station or drawal schedule of the State from such generating station for corresponding block.</p> <p><u>New case to be added:</u> For regional entity generating stations already connected to STU & ISTS and LTA for the part capacity was granted by CTUIL as per the Connectivity and grant of LTA/MTOA Regulations 2009: 'Direct drawal' may be computed as below: Actual drawal through STU feeders (as per sub-clause (i) of this Regulation) connected to identified generating station or the drawal schedule of the State through STU N/W from</p>	<p>More specific.</p> <p>In SR, Neyveli New Thermal PP (NNTPP) has the CTUIL granted LTA of 400 MW out of Installed capacity 1000MW and the balance capacity 600MW (dedicated share to TN) is being drawn through Tamil Nadu STU N/W. Further, TN has its share from 400MW also for which LTA granted.</p>

		<p>b.</p> <p>iv.</p> <p>NLDC shall calculate the quantum of ISTS drawl as “Direct drawl” from the block wise ISTS drawal data for respective time blocks:</p> <p>‘Direct drawal’= Lower 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</p>	<p>such generating station for corresponding block whichever is lower.</p> <p>Direct drawal’= Lower of</p> <p>Actual ISTS drawal through STU feeders (as per sub-clause (i) of this Regulation) connected to identified generating station or drawal schedule of the State from such generating station for corresponding block.</p>	<p>More specific.</p>
6	<p>Annexure-II:</p> <p>Methodology to determine ‘Direct drawl’ by a State from a regional entity generating station</p>	<p>a.)</p> <p>vi.</p> <p>NLDC shall notify on its website, a list of GNAd for each such State within 1 month of notification of these Regulations.</p>	<p>a.)</p> <p>vi.</p> <p>NLDC shall notify on its website, a list of GNAd for each such State along with the details of computation within 1 month of notification of these Regulations.</p>	<p>For transparency.</p>
7	<p>Annexure-II:</p> <p>Methodology to determine ‘Direct drawl’ by a State from a regional entity generating station</p>	<p>a)</p> <p>ix. While calculating Regional transmission deviation account under Sharing Regulations, actual ISTS drawal data for such host State shall be reduced by quantum of ‘Direct drawal’ for each time-block as per formula at subclause (iv) of this Regulation.</p>	<p>Clauses in respect of Transmission Deviation may be deleted.</p>	<p>The formulae in First Amendment of Sharing Regulations for the State would take care of this direct drawl as this Direct drawl is included in GNA (as per Annexure-I of Principal Regulations) and also accounted in the actual drawl. If the Direct drawl has to be removed from the Actual,</p>

		<p>b) iv. ...</p> <p>The quantum of blockwise ‘Direct drawl’ shall be reduced from actual ISTS drawal data for such State for purpose of regional transmission deviation accounts under Sharing Regulations.</p> <p>v. While calculating Regional transmission deviation account under Sharing Regulations, actual ISTS drawal data for such host State shall be reduced by quantum of ‘Direct drawl’ for each time-block as per formula at subclause (iv) of this Regulation.</p>		<p>then GNAd has to be removed from GNA/T-GNA to bring both the figures at comparable levels.</p> <p>For example: State A has GNA of 5000 MW and GNAd is 500 MW, then for deviation 4500 MW needs to used in the formulae if “Direct drawl” is removed from the Actual drawal as suggested in the Draft Amendment. Else, if GNA of 5000 MW is taken, the actual drawal already includes GNAd/Direct drawl.</p> <p>Therefore this clause may be removed.</p>
8	<p>Annexure-II: Methodology to determine ‘Direct drawl’ by a State from a regional entity generating station</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>iii. CTU shall identify such generating station and inform NLDC.</p>	<p>iii. CTU shall identify such generating station and inform NLDC along with the details of STU/ISTS network.</p>	
