

TAMIL NADU GENERATION AND DISTRIBUTION CORPORATION LTD

From

B.RAJESWARI, B.Com., FCMA,
Chief Financial Controller / Regulatory Cell,
7th Floor, Western Wing,
144, Anna Salai,
Chennai - 600 002.

To

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

Lr. No. CFC/RC/SE/CERC/EE/AEE/ F. CERC /D.46/23 dt:27.02.2023

Sir,

Sub: CERC – Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) (First Amendment) Regulations, 2023 - Submission of comments and suggestions of TANGEDCO – Regarding.

Ref: (i) CERC's notification No. L-1/261/2021/CERC dt: 27.01.2023
(ii) CERC's notification No. L-1/261/2021/CERC dt: 16.02.2023

This has reference to the public notice of Hon'ble CERC dated: 27.01.2023 and 16.02.2023 inviting comments / suggestions on the Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) (First Amendment) Regulations, 2023.

In this context, the comments and suggestions of TANGEDCO are submitted in the annexure enclosed. It is requested that the observations /comments and suggestions of TANGEDCO may kindly be taken into consideration while finalizing the Regulations.

Thanking you,

Yours faithfully,

Encl.: As above


Chief Financial Controller /
Regulatory Cell

Comments and suggestions of TANGEDCO on the draft CERC (Connectivity and General Network Access to the inter-State Transmission System) (First Amendment) Regulations, 2023

At the outset, TANGEDCO submits that detailed comments and observations on the draft CERC (Connectivity and General Network Access to the Inter-State Transmission System) Regulations, 2021 have already been submitted by TANGEDCO. Further, a detailed presentation was given during the public hearing held on 07.03.2022. The following major issues in the GNA Regulations were highlighted and requested modifications / addition/ deletions:

- STUs are proposed to be GNA applicants on behalf of State owned Discoms – Reg.17.1 to be modified as "**State owned discoms and State Transmission Utility** on behalf of distribution licensees."
- The existing LTAs of Discoms converted as Deemed GNA of the STU - *Not appropriate and legally untenable to convert the contract of one entity to deemed contract of other entity*
- Time bound LTA/ MTOA/ STOA contracts will become null and void – *Draft Regulations to be modified to have time bound GNA agreements*
- Relinquishment charges made mandatory for contracts expiring as per the existing agreements - *State owned discoms shall be allowed to exit the GNA contract / continue the contract without any financial liability on expiry of PPA*
- **Methodology for calculating the Deemed GNA** - Maximum ISTS drawal in a time block during the year and average of (maximum ISTS drawal in a time block in a day) during the year on equal ratio
 - Maximum drawal in a particular time block (15 min) considered is attributed to :
 - Short term drawal
 - Huge deviation in RE dispatch
 - Generation outages

- **Erroneous inclusion of deemed LTA by NLDC in cases of CGS connected thro STU network / both STU and ISTS network**
- Skewed up quantum of deemed GNA

Hence, it was requested to revise the proposed methodology for calculating the deemed GNA.

- Specific provision for treatment of LTA associated with generating stations connected to both ISTS and Intra State network - *These is no specific provision for treatment of LTA associated with generating stations connected to both ISTS and intra state network in consonance with Reg. 13(11) of the Sharing Regulations 2020*
- System Study by Nodal Agency –The process of consultation with the stake holders removed - *Regulations 6.1 and Reg. 21 to be modified to retain consultation process*
- **Specific provision for extension / termination of deemed GNA** – *Since the LTA grantee having serviced the investment made in the ATS will have the first right to extend the validity period of the contract or terminate the contract without any financial liability on termination of the PPA*
- **Apart from the above major issues, it was requested to consider the other issues in the draft Regulations.**

A copy of the detailed comments and observations on the draft CERC (Connectivity and General Network Access to the Inter-State Transmission System) Regulations, 2021 is enclosed for reference as **Annexure I**

2. However, without considering any of the comments / views /objections of TANGEDCO, Hon'ble Commission notified the CERC (Connectivity and General Network Access to the Inter-State Transmission System) Regulations, 2022 on 07.06.2022. The reason for non consideration of the views and objections of TANGEDCO was neither justified nor the Statement of Reasons (SoR) has been notified along with the Regulations.
3. In this regard, it is pertinent to submit that some of the provisions in the new GNA Regulations are contrary to some of the provisions of existing Transmission Planning Regulations 2018, Connectivity and Open Access Regulations 2009 as well as Sharing Regulations 2020 in terms of detailed procedure for planning transmission systems, term of Long Term Access

contract and provision for treatment of generating stations connected with both ISTS and Intra STS.

4. The sanctity of LTA/MTOA contracts has also been compromised imposing huge recurring financial burden on account of converting the time bound LTA / MTOA/STOA into permanent GNA and also imposing penalty in the form of relinquishment charges to exit from GNA which is supposed to be terminated on expiry of PPA.
5. Most importantly, inclusion of the quantum of power drawn through Intra-State network (in respect of ISGS connected with exclusive Intra State / both ISTS and Intra STS) into GNA computation is totally against the fundamental principles of allocation of transmission costs mandated under the National Tariff Policy, National Electricity policy under the ambit of Electricity Act 2003, resulting in skewed up GNA and huge financial burden on TANGEDCO. Since under the new Sharing Regulations 2020 the transmission charges are allocated in the Ratio of LTA/MTOA (new GNA), this skewed up erroneous GNA imposed a recurring financial burden on TANGEDCO forever.
6. Apart from the above, the Hon'ble CERC has modified the definition of Associated Transmission (ATS) which was not brought in the draft Regulations. The definition proposed under draft and the final Regulations are extracted:

"Any augmentation required, excluding terminal bay(s), to the existing ISTS identified under Regulation 6.1 of these regulations, shall be considered as the Associated Transmission System (ATS) for the Applicant(s)."- as per draft

Of the augmentation requirement as identified under Regulation 6.1 of these regulations, augmentation required for immediate evacuation of power of the Applicant (s), excluding terminal bay(s), shall be considered as the Associated Transmission System (ATS) for the Applicant(s)- as per final Regulation

7. The above definition has changed the gamut of the Planning and blatantly relieved the Connectivity grantees from the liability of compensating the transmission licensee in case of failure to match the commissioning of the generation project with COD of transmission system or abandonment of the projects and the entire

financial burden on account of redundant transmission system created will be imposed on the existing DICs. This will also lead to creation of redundant transmission capacities due to the fact that the planners are facilitated to plan the transmission schemes without firm generation capacities and identified beneficiaries. There were number of such financially unviable and technically stranded transmission schemes created in the recent past resulting in imposition of huge illegitimate liabilities on the DICs through the pool(Example- 92/MP/2015 – Relinquishment case)

8. TANGEDCO further submits that subsequent to the notification of the Principal Regulations ie. GNA Regulations 2022, TANGEDCO had flagged the issue of non-exclusion of the quantum of Intra-State drawl from the GCS stations through Intra-State network for computation of deemed ISTS as mandated under the Regulations in respect of the following stations:

1. MAPS
2. NLC TPS-II- Stage –I and II
3. NTECL Vallur,
4. Kudankulam Units 1&2
5. NTPL – Tuticorin

9. A letter dated 13.07.2022 was addressed to Secretary /CERC from TANGEDCO requesting to consider the genuine grievance of TANGEDCO and revise the deemed GNA duly excluding the drawl through State drawl node in respect of the above stations for the year 2018-19,2019-20 and 2020-21. A copy of the same is enclosed as **Annexure II.**

10. Subsequently, TANGEDCO vide letter dated 22.08.2022 addressed to Secretary /CERC submitted the details of the Intra State drawl nodes to be excluded for the computation of deemed GNA, Single line diagram of the switchyards showing the SEM meter

locations in Intra State drawl points, block wise ISTS drawl data (inclusive of Intra State drawl nodes), block wise drawl data through Intra State nodes (treated as ISTS drawl) for the years 2018-19, 2019-20 and 2020-21. It was requested to refix the deemed GNA as **7692 MW** after duly excluding the drawl through State drawl nodes and also issue suitable direction to CTUIL and NLDC for revising the GNA bifurcation and computation of transmission charges and losses on implementation of the GNA Regulations, 2022. A copy of letter dt: 22.08.22 is enclosed as **Annexure III**.

- 11.** Further to this, based on the constant followup and insistence of TANGEDCO, NLDC had shared the bifurcation of drawl from CGS through ISTS and Intra State network. From the data furnished by NLDC it is obvious that the deemed GNA fixed by CERC has included the drawl through Intra State network.
- 12.** Under the above circumstances, the Hon'ble Commission has notified the draft amendment Regulations to CERC (Connectivity and General Network Access to the inter-State Transmission System) (First Amendment) Regulations, 2023.
- 13.** In this regard, TANGEDCO submits the comments and views on the proposed amendments as below:

13.1 Proposed Amendment

Amendment to Regulation 7.1 and 7.2 of the Principal Regulations:

The words "ATS" shall be substituted with the word "augmentation" in Regulation 7.1 of the Principal Regulations.

The words "ATS" shall be substituted with the word "augmentation (with ATS or without ATS)" in Regulation 7.2 of the Principal Regulations.

Comments and views of TANGEDCO

As stated earlier, the definition for ATS has to be restored as notified in the draft GNA Regulations 2021, which otherwise would relieve the generators from the responsibility of providing bank guarantees in proportion to the transmission system developed at their behest. Hence, the proposed amendment may be dropped and the original definition shall be retained to safeguard the interest of DICs and end consumers.

13.2 Proposed Amendment

Amendment to Regulation 8.2 of the Principal Regulations: 6.1. The first para of the Regulation 8.2 of the Principal Regulations shall be substituted as under: "8.2 For cases covered under (i) Regulation 7.1 of these regulations and (ii) Regulation 7.2 (Augmentation without ATS) of these regulations, Conn-BG2 and Conn-BG3, shall be furnished as under:"

Comments and views of TANGEDCO

TANGEDCO submits that since the definition of ATS play a key role in deciding the BGs, it is essential to restore the definition of ATS as per the original draft GNA Regulations.

13.3 Proposed Amendment

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."

Comments and views of TANGEDCO

It is essential to segregate the entities having connectivity with only Intra State Transmission system and entities having connectivity with both Intra State Transmission system as well as ISTS so as to impose restrictions on the quantum of GNA to be availed in ISTS based on the Intra State open access availed by them. Otherwise for the same quantum, these entities will avail access in both ISTS and Intra State resulting in redundant transmission system.

13.4 Proposed Amendment

13. Amendment to Regulation 18.1 of the Principal Regulations: 13.1. A proviso shall be added to the clause (f) of the Regulation 18.1 of the Principal Regulations as under: "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."

Comments and views of TANGEDCO

The above proviso is intended to convert the quantum or capacity of ISGS connected / evacuated through the Intra State network into permanent GNA of the drawee entity. This is totally against the mandate of Electricity Act 2003. The very purpose of creating huge Intra State infra structure by the Home States to draw power from the CGS stations located within the state will be defeated and the consumers of the state will be illegitimately burdened with the huge transmission charges imposed on account of deemed GNA in proportion to the quantum connected through Intra State network in addition to the tariff liabilities imposed on them on account of the Intra State transmission

infrastructure already created for drawing the share of the State. This is also against the MoP's guidelines on providing connectivity to both ISTS and Intra State network for CGS located in Home States.

Hence, this proviso shall be dropped

13.5 Proposed Amendment

A new Regulation, namely, Regulation 18.3 shall be added after Regulation 18.2 of the Principal Regulations as under:

"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."

Comments and views of TANGEDCO

TANGEDCO would submit that this methodology specified in Annexure -II is contrary to the methodology notified under Regulation 18.1 of the GNA Regulations 2022. The methodology notified under Regulations 18.1 is extracted below:

GNA for a (i) State including intra-State entity(ies) and (ii) other drawee entities, shall be the average of 'A' for the financial years 2018-19, 2019-20 and 2020-21: where,

'A' = {0.5 X maximum ISTS drawal in a time block during the year} + {0.5 X [average of (maximum ISTS drawal in a time block in a day) during the year]}

The Regulations clearly specifies that maximum ISTS drawl in a time block during the year and average of (maximum ISTS drawal in a time block in a day) during the year should be considered for calculating the deemed GNA.

The drawl through the Intra State network should have been excluded from the computation. Despite TANGEDCO's clear demonstration and representation to exclude the Intra state drawl from the ISTS drawl, it was not excluded from the total ISTS drawl and the deemed GNA was erroneously computed and notified.

The same was brought to the notice of the Hon'ble Commission with proof of erroneous computation.(NLDCs bifurcation of ISTS and Intra State drawl).

However, instead of excluding the actual Intra State drawl corresponding to the time block of maximum ISTS drawl, a new methodology has been proposed as below:

- i. 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 shall only be considered;*
- ii. CTU shall provide a list of such generating stations to NLDC within a week of coming into effect of these Regulations.*
- iii. NLDC shall calculate the quantum of ISTS drawl blockwise as "Direct drawal" for years 2018-19,2019-2020 and 2020-2021:*
- iv. '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.*
- v. The blockwise 'Direct drawal' shall be reduced from blockwise actual ISTS drawal data for such State.*
- vi. Based on modified ISTS drawal data as calculated at sub-clause (iv) of this Regulation, GNAs shall be calculated for such State as per formula specified in Regulation 18.1. The reduction in GNA for such State shall be calculated as GNAd which will be as follows:*

GNAd = GNA as indicated at Annexure-I – (Modified GNA after accounting for 'direct drawal' (GNAs))

The above methodology is illogical and irrational due to the following reasons:

- a. Firstly, if the Hon'ble Commission decides to consider the actual drawl quantum instead of the contracted quantum(LTA &MTOA), then it would be appropriate to exclude all the Intra State drawl nodes from the computation of ISTS drawl irrespective of time horizon of planning of the Intra State lines intended for drawl of power from ISGS to home State. The State Transmission Utilities have infused huge public fund for creation of such intra State drawl network for the purpose of drawing power from the ISGS. The schemes were discussed and approved by the Central Planning agencies. Further, at the time of planning and execution of such Intra State evacuation network, the ISTS transmission charges were shared based on the Point of connection(PoC) methodology in proportion to utilisation of the network in the ratio of LTA and MTOA of the entities.
- b. Later, the sharing methodology under the new Sharing Regulations 2020 has made upside down of the allocation of charges intending to socialise large chunk of cost associated with unutilised / under utilised transmission assets across the country in the ratio of LTA+MTOA, the utilities having invested huge public money in developing State networks for drawl of ISGS power have been put into jeopardy and being penalised with skyrocketed ISTS transmission charges.
- c. To add fuel to the burning issues of irrational allocation of transmission charges, the new GNA regulations totally disregarded the contracts between the transmission licensees and the drawee utilities by introducing the new methodology to convert the existing time bound contracts into permanent GNA based on the actual drawl through the ISTS network. **It was not even explained or justified that how the capacity based long Term and Medium**

term contracts could be replaced by maximum actual drawl that comprises of short term contracts for a very short tenure and also over draws due to various grid operating conditions (without any transmission system augmentations).

- d. Further, there was not even an indication on treatment of drawl through Intra State network and time horizon of implementation of such network in the draft GNA Regulations. The fact is that none of the ISTS network will be left unserved and the home State will continue to service the tariff of ISTS network though the share is drawn through Intra State network.
- e. Under such circumstances, the notified Regulations clearly states that only ISTS drawl should be considered for deemed GNA computation.
- f. In this regard, the Hon'ble Commission has considered the deliberation held during 39th Meeting of the Technical Coordination Sub-Committee (TCC) of SRPC held on 3rd December 2021 and at 39th Meeting of Southern Regional Power Committee (SRPC) held on 06th December 2021 for adopting the methodology for determination of deemed GNA. It is pertinent to state that the deliberations held during the meeting was related to exclusion of deemed LTA wrongly considered by CTUIL for sharing the transmission charges. TANGEDCO has not agreed with the proposal of CTUIL and the same has been challenged before Hon'ble CERC.
- g. However, the proposal of CTUIL has nothing to do with the methodology notified by Hon'ble CERC. The methodology notified by the commission is independent of the contract and wholly dependent on the actual drawl through the ISTS network. Hence, it is judicious to exclude the drawl through

the Intra State network that are directly connected to the bus bar of ISGS. When the drawl through ISTS is considered at maximum drawl time block, the actual drawl through Intra State should also be considered at the same time block.

- h. It is irrational and unjust to consider either 'Lower of Actual ISTS drawl through STU feeders' or 'drawal schedule of the State from such generating station for corresponding block'. Same methodology / principle should be adopted and ISTS and Intra STS should be treated equally. The methodology cannot be discriminatory which is against natural justice and also will impose huge illegitimate financial burden on end consumers. Further, it is submitted that the proposed modification is against the Hon'ble Commission's own Regulations and also MoP's guidelines to reduce the tariff burden of home States.
- i. Hence in order to avoid double tariff burden on end consumers for the quantum of power drawn from the CGS stations and also maintain equal and justifiable treatment to ISTS licensees and Intra State Licensees, it is submitted that either of the following methodology may be adopted:

Deemed GNA to be decided based on LTA+MTOA of the drawee entities

Or

Drawl through Intra Sate should be excluded from the total ISTS drawl for the representative time blocks in case of considering the maximum ISTS drawls for computing deemed GNA.

- j. It is submitted that if the Commission decides to continue with the same methodology of considering the maximum drawl through ISTS network for computing the deemed GNA, then the drawl through the following Intra State drawl node

shall be excluded taking into consideration of all the Intra State nodes on the date of implementation of the Regulations:

Intra State drawl nodes to be excluded:

Intra State Drawl nodes considered as ISTS drawl nodes				
SI.No.	Meter Code	Meter Number	Lines/ICTs	Connected to Substation
1	N1-43	NL-0067-A	STCMS	Neyveli TS 2 - 230 KV feeders
2	N1-53	NL-0014-A	Ulundurpet	Neyveli TS 2 - 230 KV feeders
3	N1-41	NL-0066-A	Kadalangudi	Neyveli TS 2 - 230 KV feeders
4	N2-21	NX-0600-A	NLC TS2 feeder 1	NLC TNEB AT NLC2
5	N2-23	NX-0599-A	NLC TS2 feeder 2	NLC TNEB AT NLC2
6	NN-19	NN-0519-A	At Neyveli TNEB SS	NLC (TN)
7	NN-21	NN-0502-A	At Neyveli TNEB SS	NLC (TN)
8	MA-05	NP-4020-A	SP Koil 1	Kalpakkam
9	MA-08	NP-4021-A	SP Koil 2	Kalpakkam
10	MA-03	NP-4022-A	Echur	Kalpakkam
11	MA-01	NP-4023-A	Achrapakkam	Kalpakkam
12	VL-29	NP-7807-A	400 kV NCTPS	Vallur
13	VL-30	NP-7808-A	400 kV NCTPS	Vallur
14	KN-11	NP-5660-A	SR Pudhur	Kudankulam
15	KN-09	NP-8340-A	TTPS	Kudankulam

- k. Further, it is submitted that NLDC may be directed to share the revised deemed GNA computation for verification by DICs before notifying the GNA amendments duly considering TANGEDCO's remarks.

The above submissions are without prejudice to the other comments and views of TANGEDCO in respect of the other views and observations of TANGEDCO on the GNA Regulations.

B. P. Rajeswar
22/02/2023
Chief Financial Controller/
Regulatory Cell, TANGEDCO

TAMIL NADU GENERATION AND DISTRIBUTION CORPORATION LTD

From

B.RAJESWARI, B.Com., FCMA,
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To

The Secretary,
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Lr. No. CFC/RC/SE/CERC/EE/ F. CERC /D.45 /22 dt:25.02.2022

Sir,

Sub: CERC – Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021- Submission of comments and suggestions of TANGEDCO – Regarding.
Ref: CERC's notification No. L-1/261/2021/CERC dt: 16.12.2021

This has reference to the public notification of Hon'ble CERC dated: 16.12.2021 inviting comments / suggestions on the draft Central Electricity regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021.

In this context, the comments and suggestions of TANGEDCO are submitted in the annexure enclosed. It is requested that the observations /comments and suggestions of TANGEDCO may kindly be taken into consideration while finalizing the Regulations.

Further, Dr.R.Kathiravan, Executive Engineer is nominated to represent TANGEDCO during the public hearing scheduled on 07.03.2022. It is also requested to permit TANGEDCO to make a Power point presentation on the views and suggestions of TANGEDCO.

Thanking you,

Yours faithfully,

B. Rajeswaran
25/02/2022
Chief Financial Controller / Regulatory Cell

Encl: As above

Comments and suggestions of TANGEDCO on the draft CERC (Connectivity and General Network Access to the Inter-State Transmission System) Regulations, 2021.

The observations, comments and views of TANGEDCO along with the other suggestions on the draft CERC (Connectivity and General Network Access to the Inter-State Transmission System) Regulations, 2021 are submitted below:

I Roles and Rights of Discoms:

- i) The State owned Distribution licensees are the entities having power purchase agreement with the generating companies to serve its end consumers. For the purpose of evacuating and transferring power from the generating stations to the load centres of the discoms, open access /network access is required for the Discoms. As per the present Connectivity and Open Access Regulations 2009, the Discoms are the LTA grantees. Discoms have entered into time bound transmission contracts (LTA/MTOA/STOA) based on quantum of allocation of power in the Central generating stations(CGS), Power Purchase Agreements(PPA) with private generators and traders. The liability for payment of transmission charges rests with Discoms. Hence, in all the activities right from Planning / approval of the optimal transmission system(ISTS) required for transfer of power to construction / declaration of COD of the transmission system and Operation and maintenance of the ISTS, Discom's role and participation is inevitable so as to protect the commercial interest of the Discoms and in turn the end consumers.
- ii) As per the present CERC (Grant of Connectivity, Long-term Access and Medium-term Open Access in inter-State Transmission and related matters) Regulations, 2009, the Discoms are the LTA grantees.

II Comments and Views

- i) The draft Regulation 17.1 mandates that the STU shall be the eligible applicant for grant of GNA or enhancement of GNA for the Discoms and other intra State entities. Since the State owned Discoms have the legitimate right to apply for GNA / enhancement of GNA for procuring power from sources



outside the State using ISTS, the State owned Discoms are required to be included exclusively under Reg.17.1.(i).

Suggestion: The Reg.17.1(i) may be modified as below:

*"17.1 **State owned discoms** and State Transmission Utility on behalf of distribution licensees connected to intra-State transmission system and other intra-State entities"*

- ii) **Regulation 6.1 & Reg. 21 System Study by Nodal Agency:** The existing procedure of consultation process for planning the transmission system through joint studies under the present Connectivity Regulations 2009 is proposed to be removed. This is in total violation of mandate of the Act as well as National Electricity Policy. This Hon'ble Commission in 200/MP/2019 held as under:

"65. Having done so, the issues and concerns expressed by the Respondents and other stakeholders are also required to be balanced while granting such relief. The Commission is guided by the principles, as provided under Section 61(d) of the Act i.e. safeguarding of consumer's interest and at the same time, recovery of the cost of electricity in a reasonable manner. Thus, the Commission has a statutory responsibility to balance the interest of developers and consumers of electricity."

- iii) The necessity of a proposed ISTS system can be assessed only in consultation with the State Transmission Utilities of a Region. State Transmission Utilities have sufficient infrastructure to meet the needs within each State. ISTS system can be planned in such a manner that ISTS system connects with the State Transmission Utility at the State periphery of the GNA applicant of a State. This will reduce the transmission charges paid for utilising the ISTS, which is based on LTA quantum taking the cost of entire ISTS network, nation-wide, into consideration. This will ultimately result in reducing the charges being paid by consumers in procuring electricity within a State.

- iv) Non-consultation of State Transmission Utilities and Discoms will jeopardise the whole planning process / rights of the Discoms to express their views and will hugely impact the finances of the Discoms. As per the Connectivity



Regulation 13(1), the nodal agency shall carryout necessary system studies in consultation and through coordination with other agencies involved in ISTS to be used. The recent judgment of this Hon'ble Commission in 200/MP/2019, from which the necessity of consulting the State Transmission Utility and Discoms is established. The capacity projected got reduced from 18.5 GW to 8 GW and proportional cost also reduced from Rs.9,485 crore to Rs.1628 crores. The relevant extract of the judgment is extracted hereunder:

"54. We observe that after a number of hearings in the matter over a period of two years, on the persistent queries of constituents in various RPC meetings and in the hearings of the Commission and on the analysis of various factors including availability of land, comprehensive All India study and applications for LTA as directed by the Commission, CTUIL has finally scaled down the proposal of transmission system for regulatory approval from 18.5 GW to 8 GW."

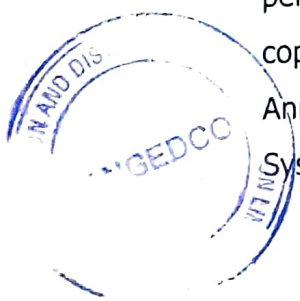
55. We are of the view that this scaling down of the proposal of transmission system for regulatory approval from 18.5 GW to 8 GW raises a serious question mark on the entire process of transmission planning and approval. In our view, there was gross lack of due diligence by statutory planning agencies such as CTUIL and intermediary agency like SECI and the competent authority which approved the scheme for the 18 GW. The basic ingredients of planning, namely availability of land, applications for LTA, comprehensive All India study and respecting the view-points of stakeholders, especially those who finally bear the cost of the transmission system through transmission charges were conveniently neglected and overlooked. It was the persistent nudging by the Commission and repeated voicing of concerns of the stakeholders that led these agencies to accept the reality, albeit reluctantly, and revise the scheme downwards.

56. We observe that the estimated cost of the originally proposed 18.5 GW transmission system was Rs.9,485 crore, whereas the estimated cost of the scaled down transmission system of 8 GW is only Rs.1,628 crore. Thus, because of scaling down of the transmission system to 8 GW, the expected additional annual transmission charges would be substantially lower than what would have been with the transmission system of 18.5 GW. Thus, had the Commission not taken the view that it took, the consumers would have been unnecessarily burdened with additional transmission charges and there would have been un-necessary capital expenditure incurred and in addition, there could have been stranded assets."



Suggestion:

- a) The provision to carryout necessary system studies in consultation and through coordination with other agencies involved in ISTS to be used shall be retained in both the Regulations 6.1 and Reg. 21.
 - b) Specific cross referencing of the Transmission Planning Regulations 2019 shall be made regarding the procedure to be followed.
- v) **Regulation 18 Deemed grant of GNA:**
- vi) The draft Regulation proposes to make the existing LTA/ MTOA/ STOA contracts null and void and does away with the procedure for executing open access agreements with Transmission licensees, which makes the process open ended. The proposed regulation does not take into consideration the periods of PPA executed between the generator and procurer. In the event of non-consideration of the PPA period, the open ended GNA will be against the mandate of 61 (d) of the Electricity Act, 2003. Even the relinquishment concept proposed in the draft Regulation will be against the mandate of Electricity Act, 2003. Under the proposed regulations the Discoms or procurers will be compelled to pay either transmission charges or relinquishment charges even after the expiry of the PPA period and associated LTA / MTOA. The entire cost incurred by the procurer after the expiry of PPA and associated LTA/MTOA will be a burden on the consumers of the procurer / Discom, since there will be not beneficial use of the transmission system.
 - vii) The draft Regulation proposes to convert the existing time bound transmission contracts (LTA/MTOA/STOA) into permanent deemed GNA which would result in huge recurring financial loss to Discoms apart from confiscating the right to exit from the transmission contracts without relinquishment charges. The draft Regulation mandates to pay relinquishment charges irrespective of the tenure of the existing contracts. The existing LTA agreement empowers the Discoms to have time bound contracts for a specific period matching with the tenure of PPA executed for power procurement. A copy of the LTA agreement entered by TANGEDCO with CTU is enclosed as Annexure-1. Further, the investment made in the Associated Transmission System is almost recovered by the transmission licensee from the Discoms at



the end of the LTA tenure. Hence, the Discoms will have the legitimate right to continue the LTA contract or exit from the same as desired by them. Relinquishment charges cannot be made mandatory to procurers or generators when the system has been used as per the contracted LTA / MTOA period.

Views and suggestions:

The treatment of the LTA / MTOA contracts between the procurers and the TSP cannot be different from the treatment of Connectivity Agreement between the generator and the TSP which is made mandatory in the draft Regulations. The proposed regulations are required to be modified to have time bound GNA agreements with transmission licensees and procurer / Discom.

- viii) **Regulation 18.1 Methodology for arriving at the Deemed GNA:**
- a) The methodology adopted for calculating the GNA prescribed under Reg.18.1 is illogical as the maximum drawal in a particular time block (15 min) depends on many factors including short term drawal, occasional over drawals due to deficit in generation, huge deviation in RE dispatch, generation outages and also drawl through State network considered as deemed LTA by NLDC etc.
 - b) The excess drawal over and above the total access granted is being allowed subject to corridor availability and Transmission deviation charges are levied. Giving 50% weightage to the rare occurrence of maximum drawl has skewed up the total deemed GNA. Further some of the utilities might be drawing higher than their average maximum drawal for majority time blocks without exceeding their LTA.
 - c) From the actual drawl data of TANGEDCO for the last three years the following observations are made:



Year	Maximum drawl considered in draft Regulation	Number of time blocks / days in which maximum drawal exceeding 8500 MW
2018-19	9732	549 time blocks / 5.71 days
2019-20	10496	1333 time blocks / 13.88 days
2020-21	12227	3234 time blocks / 33.68 days

It is evident from the above table that the maximum drawal considered in the draft Regulations persisted only for one time block of 15 minutes. Further, the drawl exceeding the LTA+MTOA quantum of 8500 MW (being considered for allocating the ISTS charges and losses) occurred for **5.71 days, 13.88 days** and **33.68 days** for the years 2018-19, 2019-20 and 2020-21 respectively. The reasons for exceeding the LTA+MTOA are as stated in the above paragraph (iv)(a). Hence considering 50% weightage for utilizing the transmission capacity for a particular time block of maximum drawal would result in skewed up quantum of GNA and not justifiable.

d) Furthermore, the following vital issue is critically important and needs kind attention of the Hon'ble Commission:

- i. The peak drawl is inclusive of the drawl through the Intra-State network owned by TANTRANSCO from the ISGS viz. MAPS, NLC TPS-II- Stage –I and II, NTECL Vallur, Kudankulam and NTPL. Based on the representation of the TANGEDCO, the implementing agency NLDC vide notification dated 31.01.2022 has excluded the deemed LTA quantum associated with MAPS, NLC TPS-II- Stage –I in the monthly bill of February 2022. The deemed GNA of 9177 MW for TANGEDCO has been worked out in the draft Regulations based on the ISTS drawl inclusive of the drawl through the state network as mentioned above which is subsequently excluded by NLDC. Hence, the deemed GNA quantum of TANGEDCO shall have to be reworked considering the above fact.



- ii. Further, the deemed LTA quantum associated with similarly placed generators needs to be excluded based on the direction of the Hon'ble Commission in the petitions being filed by TANGEDCO.

Suggestion:

- a) In order to allocate the GNA judiciously, 100% of the average maximum drawal in a day during the year for the past three years may be considered.
- b) The STOA quantum may be excluded as this would be considered under T-GNA.
- c) The deemed GNA needs to be reworked based on the above facts.
- d) The deemed GNA quantum shall be reviewed annually taking into consideration of conventional generation capacity addition by the States as well as RE capacity addition under ISTS and tie up by States.

ix) Specific provision for extension of GNA

- i) There is no specific provision for extension of GNA after expiry of the GNA tenure. In the present the Regulation 17 of the Connectivity Regulations 2009 provides extension of LTA as extracted below:

“On the expiry of the period of long-term access, the long-term access shall stand extended on a written request provided by the long-term customer in this regard to the Central Transmission Utility mentioning the period for extension that is required:”

Suggestion: A new Regulation may be introduced for extension of existing deemed GNA while granting time bound deemed GNA / additional GNA without any additional financial liability.

x) Specific provision for termination of deemed GNA

- i) On expiry of the deemed GNA based on the tenure of the existing LTA/MTOA/STOA contracts, there shall be corresponding reduction in the deemed GNA of the entity.



- ii) The PPAs entered by TANGEDCO with various Gencos expires in different time periods and the LTA associated with the PPAs also are due to expire on completion of PPAs. The details of PPA are enclosed as Annexure -3.

Suggestion:

Since the transmission systems are evolved based on LTA/MTOA, the treatment of deemed GNA on completion of the existing contracts shall be as below:

- a) In respect of LTA/MTOA involving ATS, then the grantee having serviced the investment made in the ATS will have the first right to extend the validity period of the contract and hence may be allowed to extend the contract period.
- b) In respect of STOA contracts, on expiry of contract period, the tenure of the contract may be extended under T-GNA.

Hence, necessary Regulation to this effect may be introduced.

xi) Regulation 18.1(h) Treatment of contracts executed through Traders:

- i) The existing LTA availed through traders are proposed to be converted into permanent deemed GNA irrespective of tenure of the contract. This would create redundant GNA capacity for the Discoms and adversely impose huge financial burden on termination of PPAs with the traders.

Suggestion:

On expiry of LTA availed through traders, the Discoms shall be allowed to reduce the deemed GNA proportionate to the expired LTA quantum.

Necessary Regulation to this effect may be introduced

xii) Specific provision for treatment of LTA associated with generating stations connected to both ISTS and intra state network



- i. There is no specific provision for treatment of LTA associated with generating stations connected to both ISTS and intra state network in consonance with Reg. 13(11) of the Sharing Regulations 2020. TANGEDCO is facing huge financial repercussions due to non exclusion of the capacity connected with Intra State transmission system in cases of generating stations connected to both ISTS and intra state network by the implementing agencies despite specific provisions in the Sharing Regulations. After a prolonged struggle, a part quantum has been excluded from the deemed LTA for computation of transmission charges by the nodal agency.

Suggestion:

In order to facilitate harmonious implementation of the Regulations, there shall be specific provision for treatment of generating stations connected with both ISTS and intra state network in consistent with the Reg13(11) of the Sharing Regulations 2020 to make it unambiguous.

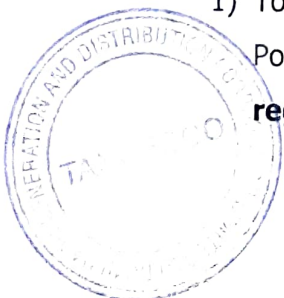
A specific provision / Regulation shall be made to exclude the capacity connected/ quantum drawn through State network from the deemed GNA.

xiii) Implication of GNA Regulations on the sharing methodology of transmission charges and Sharing Regulations 2020

Since the draft GNA regulations changes the gamut of the grant of connectivity, Access, Transmission Planning procedure as well as sharing of the transmission charges, there is an urgent need to make the stake holders aware of the probable changes intended by the Hon'ble Commission in various other Regulations including the Sharing Regulations 2020 and the Grid Code Regulations. Hence, it is suggested to notify all such cascading impacts concurrently.

xiv) Other Suggestions / views

- 1) To be added under Reg 4.1 (f) Any generator including REGS/ESS/RE Power park developers **without identified beneficiaries / target region beneficiary**



- 2) **Reg.4.3** Provided: If the entity is already connected to Intra State network, then switching over to ISTS connectivity should be allowed only after payment of applicable charges to the STU
- 3) **Reg. 5.6:** It is important that the generator having PPA tie-up should get consent of the beneficiaries of the station who are paying the transmission charges before entering into agreement with the REGS, they shall also get appropriate charges for sharing such facility and the same shall be passed on to the beneficiaries. The cost of dedicated transmission line and common facilities is built in the generation tariff of the generator being recovered from the beneficiaries. Hence, there should a tripartite agreement among generator, beneficiaries and the RE Generator to share the cost of the dedicated line / common switch yard. Necessary proviso may be given.
- 4) **Reg.5.8** : Application for Connectivity shall contain tentative point of drawal.
- 5) **Proviso under Regulation 6.1** to be modified as :“Provided that the existing ISTS for the purpose of this Regulation shall include transmission system which has been awarded / **approved** for implementation, as on the last day of the month in which application”
- 6) **Regulation 11.1** to be modified: ...implementation of generation project work under its scope including dedicated transmission lines and **or terminal bays**
- 7) **Reg.12.4** is contrary to the provision under Regulation 6.2 where the terminal bays are excluded from the ATS. Since exclusion of terminal bays from ATS makes sense and justifiable, it is suggested to remove /modify the Regulation 12.4 in line with 6.2
- 8) **Reg.19.2** : State owned Discoms to be included as eligible applicant (directly to nodal agency) & Periodicity to be made as twice in a year as Coordination /planning meetings are conducted every month. Accordingly all relevant regulations shall be modified
- 9) Clarification may be provided on difference between the System studies to be carried out for grant of connectivity and for grant of GNA



- 10) **Reg 23.** Time Restriction (one year) for use of GNA by other grantees shall be removed so as to utilize the network optimally and reduce redundant investment.
- 11) Provision for Permanent transfer of GNA to other entities may be included
- 12) **Reg 24** Under relinquishment of full quantum of GNA, if the entity is disconnected, the treatment of Connectivity shall be specified.
- 13) **Reg.37.6(2)** Provision to be introduced: Con BG 2 to be obtained for Target region based connectivity and GNA in case ATS is required
- 14) Segregation of GNA under Inter regional /Intra regional category will have disputes in allowing GNA by the System operators / Implementing agency. Hence, there shall clear categorization and detailed procedure on categorization of the GNAs to avoid disputes.
- 15) This Hon'ble Commission is guided by the principles, as provided under Section 61(d) of the Act i.e. safeguarding of consumer's interest and at the same time, recovery of the cost of electricity in a reasonable manner. Thus, the Commission has a statutory responsibility to balance the interest of developers and consumers of electricity. As a consequence of this, the Renewable Energy Generators/ procurers should also pay the transmission charges under the GNA and hence it is requested to make necessary amendments in the relevant Regulations.

B. P. Rajeswar
25/02/2022
Chief Financial Controller / Regulatory Cell



INDIA NON JUDICIAL

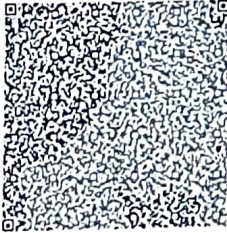
Government of National Capital Territory of Delhi



सत्यमेव जयते

e-Stamp

Certificate No. : IN-DL74988905460364N
 Certificate Issued Date : 03-Mar-2015 10:56 AM
 Account Reference : IMPACC (IV)/ dl915103/ DELHI/ DL-DLH
 Unique Doc. Reference : SUBIN-DL91510346948430071708N
 Purchased by : POWER GRID CORPORATION OF INDIA LTD
 Description of Document : Article 5 General Agreement
 Property Description : Not Applicable
 Consideration Price (Rs.) : 0
 (Zero)
 First Party : POWER GRID CORPORATION OF INDIA LTD
 Second Party : Not Applicable
 Stamp Duty Paid By : POWER GRID CORPORATION OF INDIA LTD
 Stamp Duty Amount(Rs.) : 100
 (One Hundred only)



Please write or type below this line.....

AGREEMENT FOR LONG TERM ACCESS WITH SYSTEM STRENGTHENING
 BETWEEN

POWER GRID CORPORATION OF INDIA LIMITED
 AND

TAMIL NADU GENERATION AND DISTRIBUTION CORPORATION LIMITED

This Long Term Access Agreement (hereinafter called LTAA) entered into on the 4th day of March, 2015 between Central Transmission Utility i.e. POWER GRID CORPORATION OF INDIA LIMITED, a company incorporated under the Companies Act, 1956, having its registered office at B-9, Qutab Institutional Area, Katwaria Sarai, New Delhi-110 016 (hereinafter called either "CTU" or "POWERGRID", as the context may demand, which expression shall unless repugnant to the context or meaning thereof include its successors and assigns) as party of the first part;

And

Statutory Alert

1. The authenticity of this Stamp Certificate should be verified from the website available on the website renders it invalid.
2. The onus of checking the legitimacy is on the users of this certificate.
3. In case of any discrepancy please inform the Competent Authority.



TAMIL NADU GENERATION AND DISTRIBUTION CORPORATION, a company incorporated under the companies Act, 1956 having its office at 144, NPKRR Maaligai, Anna Salai, Chennai-600002, Tamil Nadu (hereinafter referred to as Long Term Customer or 'LTC' or "TANGEDCO", which expression shall unless repugnant to the context or meaning thereof include its successors and assigns) as party of the second part.

A) WHEREAS POWERGRID is a deemed ISTS licensee and has been mandated to undertake the functions of CTU as provided under the Electricity Act 2003.

B) AND WHEREAS "NTPC Ltd" is developing Kudgi TPS Phase-I (3x800 MW) Generation Project and is desirous to avail Long Term Access to ISTS in accordance with Central Electricity Regulatory Commission (Grant of Connectivity, Long-term Access and Medium-term Open Access in inter-State Transmission and related matters) Regulations, 2009 hereinafter referred to as "LT Access Regulations, 2009" & Procedures stipulated thereof for transmission of power as per their application. Accordingly, Long Term Access (LTA) for 2392.49 MW from their Kudgi TPS Generation Project has been granted to NTPC by CTU vide intimation No. C/ENG/SEF/TA/L/S/10/013-R1 dtd 23.01.2015, wherein the details of injection of power points and drawl of power by various beneficiaries is given. A copy of the same is enclosed herewith as Attachment-1.

C) AND WHEREAS as per Detailed Procedures of CTU under Regulation 27 (1) of the CERC (LT Access Regulations, 2009), in case of, inter- alia, Inter State Generating Stations owned by Central Government where allocation of power to various beneficiaries has been notified and PPA is signed, the Long Term Access Agreement, may, in such cases be directly signed by the beneficiaries with the CTU.



2



D) AND WHEREAS "TANGEDCO" has been allocated 353.06 MW from KUDGI TPS Phase-I generation project of NTPC and for which PPA has already been signed by NTPC. Accordingly, "TANGEDCO" is required to sign this Long Term Access Agreement to avail Long Term Access of transmission facilities for transfer of allocated power from Kudgi TPS Phase -I and to make payment of transmission charges to CTU as per CERC Regulation, in accordance with the provisions in the Electricity Act, 2003 & relevant CERC Regulations.

E) AND WHEREAS the common transmission system for transmission of power as indicated at Attachment-1, has been finalized in accordance with the provisions in the Electricity Act, 2003 & guidelines thereon. This transmission system shall be built, owned, operated and maintained by M/s L&T Infrastructure Development Projects Limited, who has been selected as ISTS Licensee through the process of Tariff Based Competitive Bidding and SPV for the same has also been transferred to them for execution of said Transmission Project.

F) AND WHEREAS CERC has notified "Central Electricity Regulatory Commission (Sharing of Inter State Transmission Charges and Losses) Regulations, 2010 hereinafter called "Sharing Regulations". Accordingly, the determination and sharing of transmission charges and losses shall be as per the provisions of the same in accordance with the provisions in the Electricity Act, 2003 & relevant CERC Regulations.

G) AND WHEREAS in accordance with LT Access Regulations and Procedures thereof and Electricity Act 2003, CTU has granted such Long Term Access from the date of availability of the transmission system for the transfer of power as mentioned in Attachment-1 of this agreement, subject to signing of LTA Agreement and Transmission Service Agreement (TSA) by "TANGEDCO".

[Handwritten signature]



H) AND WHEREAS the Detailed Procedures of Central Transmission Utility under Central Electricity Regulatory Commission (LT Access Regulations, 2009) are undergoing revision. Any revision approved by CERC shall apply to this agreement mutatis mutandis.

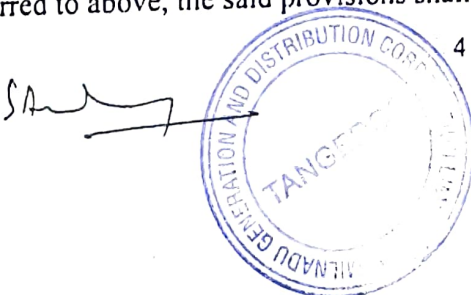
I) AND WHEREAS 'LTC' has to share and pay all the applicable transmission charges of the total transmission system since 02.01.2016 (as per CERC order dated 08.01.2014 under petition no. 190/TT/2013) or from the actual COD of the transmission system, whichever will be later, as the date of Commencement of Long Term Access in accordance with the guidelines/order(s)/directions of Central Electricity Regulatory Commission, as the case may be.

J) AND WHEREAS 'LTC' has also agreed to share and pay all the applicable transmission charges from the date of Commencement of Long Term Access of

- i) entire Inter State Transmission System (ISTS)
- ii) deemed ISTS, i.e. the Non-ISTS considered as ISTS prior to notification of Sharing Regulations,
- iii) non-ISTS, as certified by the concerned RPC,
- iv) non-POSOCO assets including metering & communication system of POWERGRID associated with ULDC and NLDC,
- v) any additions/alterations/modifications in the above.

K) AND WHEREAS it has become incumbent upon 'LTC' and CTU to enter in to LTAA as envisaged under the "LT Access Regulation-2009".

L) AND WHEREAS, during the tenure of this agreement if any of the covenants and conditions recited in this agreement are found inconsistent with the provisions of the Electricity Act 2003, notifications/ guidelines/ codes/ rules/ regulations & amendments thereof from time to time, not withstanding any thing contained in the agreement referred to above, the said provisions shall prevail.



M) AND WHEREAS, "TANGEDCO" has to sign Transmission Service Agreement (TSA) with CTU (if not already signed) as per CERC (Sharing of Inter State Transmission Charges and Losses) Regulations, 2010 and conditions of the same shall prevail.

Now, therefore, in consideration of the above premises, it is hereby agreed by and between the parties as follows:

1.0

- a) As the transmission system shall be built by M/s L&T Infrastructure Development Projects Limited, the ISTS Licensee(s) selected through Tariff Based Competitive Bidding as mentioned above, the schedule date of completion shall be 29.12.2015 as indicated in the award issued by Bid Process Coordinator (BPC) for TBCB ISTS Licensee.
- b) The 'LTC' shall sign the Transmission Service Agreement (TSA) with CTU (if not already signed), as per CERC (Sharing of Inter State Transmission Charges and Losses) Regulations, 2010. However "TANGEDCO" has already signed Transmission Service Agreement (TSA) on 05.08.2011.
- c) The 'LTC' shall furnish Letter of Credit for requisite amount in favour of CTU towards Payment Security Mechanism in accordance with the CERC Regulations before the commencement of LTA.
- d) The 'LTC' shall share and pay all the applicable transmission charges of the total transmission system indicated at Attachment-1 and brought out above from the date of Commencement of Long Term Access in accordance with the

SA



sharing mechanism, as decided/ notified/ determined/ adopted by Central Electricity Regulatory Commission from time to time.

- 2.0 In order to monitor/ review the progress of work under the scope of generator and ISTS Licensee, a Joint co-ordination meeting with their representatives shall be held at regular interval (preferably quarterly) by CTU/CEA as and when required. CTU may invite any statutory authority/Agencies/Utilities to facilitate the same.
- 3.0 All differences/ disputes between the parties arising out of or in connection with this Agreement shall be resolved in terms of the Redressal Mechanism provided under Regulation 32 of the CERC (LT Access Regulations, 2009) and under Electricity Act 2003.
- 4.0 This is agreed to by Long Term Customer(s), to indemnify and hold the CTU harmless from and against any and all damages, losses, liabilities, obligations, penalties, cause of action, claims of any kind (including, without limitation, reasonable attorneys' fees and expenses) (collectively "Losses"), suffered, incurred or paid, directly, as a result of, in connection with or arising out of and relating to exercise of CTU's actions pursuant to and in accordance with this Agreement.
- 5.0 Out of total LTA for 2392.48 MW given in LTA grant intimation letter, 358.87 MW is presently unallocated to any of the beneficiaries. In future, if there is any change in the MW quantum allocated to "TANGEDCO" by MoP, GoI, the same shall automatically stand incorporated in this agreement.
- 6.0 This Agreement shall be valid from the date of signing of this agreement till the validity of Long Term Access subject to its revision as may be made by the parties to this Agreement provided that this Agreement may be mutually renewed





or replaced by another Agreement on such terms as the parties may mutually agree.

In witness whereof both the parties have executed this Agreement through their authorized representative.

Witness

Signature :.....

एन. के. वर्णेय / S. K. VARNNEY
Name:.....
पावर ग्रिड कॉर्पोरेशन ऑफ इंडिया लिमिटेड
Power Grid Corporation of India
Designation:.....
Plot No.-2, Sector-29, Gurgaon- 122 001 (Haryana)

For and on behalf of
Central Transmission Utility

Signature:.....

राकेश प्रसाद / RAKESH PRASAD
Name:.....
पावर ग्रिड कॉर्पोरेशन ऑफ इंडिया लिमिटेड
Power Grid Corporation of India
Designation:.....
Plot No.-2, Sector-29, Gurgaon- 122 001 (Haryana)

Signature :.....

Name:..... R. KATHIRAVAN

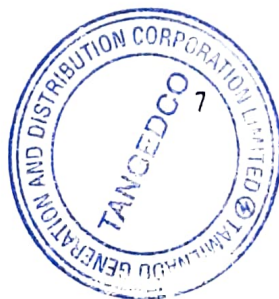
Designation:.....

Executive Engineer/Tariff Cell
TANGEDCO
Chennai, Tamil Nadu

Signature:.....

S. ARULSAMY,
Name:.....
M.Com., A.I.C.W.A., A.C.S., B.G.L., B.Ed..
Director / Finance
TANGEDCO

Designation:.....
44, Anna Salai, Chennai - 600 002.



पावर ग्रिड कारपोरेशन ऑफ इंडिया लिमिटेड

(भारत सरकार का उद्यम)

POWER GRID CORPORATION OF INDIA LIMITED

(A Government of India Enterprise)



पावरग्रिड

केंद्रीय कार्यालय : सादामिनी प्लॉट नं. 2, सेक्टर-29, गुरुगढ़-122001, हरियाणा
 फोन : 2571700-719, फैक्स : 2571760, 2571761, 2571762
 Corporate Office : "Saudamini" Plot No. 2, Sector 29, Gurgaon-122 001, Haryana
 Tel : 2571700-719, Fax : 2571760, 2571761, 2571762 Gram : "NATGRID"

संदर्भ संख्या/Ref. Number

C/ENG/SEF/TA/LS/10/013-R1

Date : 23rd January, 2015

Shri C. V. Anand
 GM (Commercial)
 NTPC Bhavan, Core-7, Scope Complex
 7, Institutional Area, Lodhi Road
 New Delhi-110 003.

Subject: Grant of Long Term Access (LTA) for NTPC Limited for Kudgi TPS generation in Karnatka

Dear Sir,

This has reference to your letter dated 22.12.2014 vide which re-allocation to Andhra Pradesh & Telangana from Kudgi TPS was intimated. In view of the said letter & our earlier intimation for grant of LTA dated 23.12.2011 for Kudgi TPS (3x800 MW) is being revised as per the re-allocation to Andhra Pradesh & Telangana in accordance with CERC Regulations.

It is requested that you may sign the necessary LTA Agreement as per the provisions of CERC Regulations, 2009.

Thanking you,

Yours faithfully,

Seema
 (Seema Gupta)

Chief Operating Officer (CTU-Plg & CE)

SA



पंजीकृत कार्यालय : बी 9, कुतुब इस्तीलाखानल एरिया, कलवर्ला सराय, नई दिल्ली-110016 दूरभाष : 26560121 फ़ोन : 011-26560039 तार : 'नेटग्रिड'
 Registered Office : B-9, Outub Institutional Area, Kulkarlie Sarai, New Delhi-110016 Tel. : 26560121 Fax : 011-26560039 Gram : "NATGRID"

स्वहित एवं राष्ट्रहित में ऊर्जा बचाएँ
 Save Energy for Benefit of Self and Nation

- 0 -

POWER GRID CORPORATION OF INDIA LTD.
Intimation for Grant of Long-term Access (LTA)

- | | | |
|----|--|--|
| 1 | Intimation No.
Date : | C/ENG/SEF/TA/L/S/10/013-R1
23 rd January, 2015 |
| 2 | Ref. Application No.
Date : | 01:CD:706
15 th April, 2011 |
| 3 | Name of the Applicant | M/s NTPC Limited |
| 4 | Address for Correspondence | AGM (Commercial), NTPC Bhavan, Core-7,
Scope Complex, 7, Institutional Area, Lodhi
Road,
New Delhi-110 003 |
| 5 | Nature of the Applicant
Normal Generator (other than captive) :
Captive Generator
Bulk Consumer
Electricity Trader
Distribution Licensee
Others | Generator
-
-
-
-
- |
| 6 | Details for Long Term Access (LTA) | |
| 6a | Quantum (MW) for which LTA is granted | 2392.49 MW |
| 7 | Injection of Power (more than one only in case of single Drawal)
Entity-1
State/Region
Quantum-1
Connectivity with the Grid | M/s NTPC Limited, Kudgi
Karnataka / Southern Region
2392.29 MW
NTPC Kudgi Switchyard |
| 8 | Drawal of Power (more than one only in case of single Injection)
Entity-1
State/Region
Quantum-1
Connectivity with the Grid

Entity-2
State/Region
Quantum-2
Connectivity with the Grid

Entity-3
State/Region | Karnataka Discoms
Karnataka / Southern Region
1196.24 MW
Various CTU substations in Karnataka

KSEB
Kerala / Southern Region
119.18 MW
Various CTU substations in Kerala

TANGEDCO
Tamil Nadu / Southern Region |



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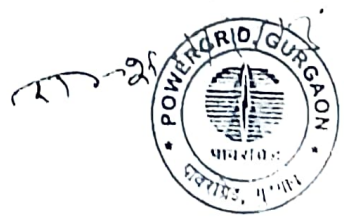


Quantum-3 300.10 MW
Connectivity with the Grid Various CTU substations in Tamil Nadu

Entity-4 Andhra Pradesh Discoms
State/Region Andhra Pradesh / Southern Region
Quantum-4 192.79 MW
Connectivity with the Grid Various CTU substations in Andhra Pradesh

Entity-5 Telangana Discoms
State/Region Telangana / Southern Region
Quantum-5 225.31 MW
Connectivity with the Grid Various CTU substations in Telangana

- 9 Transmission System for LTA Transmission System Strengthening required for LTA associated with Kudgi TPS Phase-I
 - a. Kudgi TPS – Narendra (New) 400 kV 2xD/C quad-lines
 - b. Narendra (New) – Madhugiri 765 kV D/c line (initially charged at 400 kV)
 - c. Madhugiri – Bangalore 400 kV D/c (quad) line.
- 9a Date from which LTA is granted Subject to availability of above transmission system (anticipated August, 2015)
- 9b Date upto which LTA is granted July, 2040
- 9c Implementing Agency for transmission system required for LTA Transmission Licensee identified through Tariff Based Competitive Bidding
- 9d Agencies between which agreement is to be signed for implementation of transmission system NTPC Limited & Power Grid Corporation of India Ltd.
- 9e Amount (in Rupees) for which Bank Guarantee is to be provided by the applicant NA
- 10 Transmission Charges Applicable Shall be as per CERC Regulations as amended from time to time
- 11 Amount (in Rupees) for which Bank Guarantee is to be provided by the applicant To be informed later



Note:

- 1. Due date for receipt of acceptance : Within one week from issue of this letter.

Page 2 of 4

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-10-

Intimation No. C/ENG/SE/TA/AS/10/013-R1

2. In the event of non-signing of LTA Agreement within 30 days of receipt of draft from POWERGRID, the LTA would be treated as cancelled and fresh application would be required.
3. The "zero date" for implementation of transmission system for providing LTA would start from the day of signing of LTA agreement and submission of bank guarantee whichever is later
4. Status for generation project granted Connectivity shall be reviewed in six months for achievement of following milestones to undertake implementation decision.
 - a) fuel linkage for 70% of the installed capacity,
 - b) award of EPC contract for main plant,
 - c) environment clearance,
 - d) forest clearance,
 - e) financial closure and
 - f) Payment of advance for the main plant packages
5. In case of non-fulfillment of any of the above milestones, the zero date is shifted by six months and project status would be reviewed periodically.
6. In case of non-fulfillment of any of the above milestones after another six months (i.e. 12 months after Zero date), no further action on implementation would be taken.
7. The LTA shall be as per the detailed procedures of Central Transmission Utility (POWERGRID) for Grant of Connectivity, Long-term Access and Medium-term Open Access to Inter-State Transmission as amended from time to time. Further the detailed procedure under this regulation is undergoing modifications in view of the Point of Connection (PoC) Regime and Govt. of India order post 5th January, 2011 for implementation of transmission system through competitive Tariff Based Bidding, any such modifications approved by Hon'ble Central Electricity Regulatory Commission shall also be applicable.
8. As per prevailing arrangement, POWERGRID shall inform the Empowered Committee on Transmission for implementation of new strengthening identified under Connectivity after the applicants sign above agreement, submits requisite Bank Guarantee and achieved above milestones.

Place: Gurgaon
Date: 23.01.2015

SA
Name: Seema Gupta
Designation: COO (CTU-Plg & CE)

To:
Shri C. V. Anand
GM (Commercial)
NTPC Bhavan, Core-7, Scope Complex
7, Institutional Area, Lodhi Road
New Delhi-110 003.



Copy :

Member (PS) Central Electricity Authority Sewa Bhawan, R.K.Puram, New Delhi-110 066. FAX : 011-26102045	Chief Engineer (SP & PA) Central Electricity Authority Sewa Bhawan, R.K.Puram, New Delhi-110 066. FAX : 011-26102045
Member Secretary Southern Regional Power Committee 29, Race Course Cross Road Bangalore 560 009. FAX : 080-22259343	Director (Transmission) Transmission Corp. of Andhra Pradesh Ltd. Vidyut Soudha Hyderabad – 500 082. FAX : 040-66665137
Director (Grid Transmission & Management) Transmission Corp. of Telengana Ltd. Vidyut Soudha Hyderabad – 500 082. FAX : 040-23321751	Member (Transmission) Karnataka State Power Transmission Corp.Ltd. Cauvery Bhawan Bangalore 560 009. FAX : 080 -22228367
Member (Transmission) Kerala State Electricity Board Vidyuthi Bhawanam, Pattom, P.B. No. 1028 Thiruvananthapuram – 695 004. FAX : 0471-2444738	Superintending Engineer –I First Floor, Electricity Department Gingy Salai Puducherry – 605 001. FAX : 0413-2334277/2331556
Director (TANTRANSCO) Tamil Nadu electricity Board (TNEB) 6th Floor, Eastern Wing, 800 Anna Salai, Chennai – 600 002. FAX : 044-28516362	

Copy for information to:

ED (Commercial) / ED (SRTS-I) / ED (SRTS-II) / CEO (POSOCO) / ED (SRLDC)

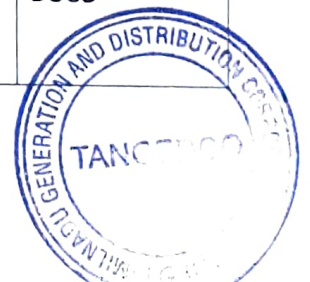
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ANNEXURE - II

CAPACITY AND ALLOCATION DETAILS FROM CENTRAL GENERATING STATIONS

Sl.No.	Name of the Generating Station	As per SRPC/ERPC power allocation in MW TANGEDCO's share	DOCO	PPA Executed on	Duration of PPA
NTPC's GENERATING STATIONS					
1	Talcher STPS-Stage-I (2x500 MW) NTPC SR-1000 MW	8.5 MW (0.85%)	01.01.1997 01.07.1997	09.09.1994	5 Yrs from DOCO and extendable on mutually agreed basis
2	Talcher STPS-Stage-II (4x500 MW) NTPC/ER-2000 MW	501.6 MW (25.08%)	01.08.2003 01.03.2004 01.11.2004 01.08.2005	13.05.1998	5 Yrs from DOCO and extendable on mutually agreed basis
3	Farakka STPS / NTPC ER-1600 MW	20.64 MW (1.29%)	01.11.1986 01.10.1987 01.09.1988 01.07.1996 01.04.1995	09.09.1994	5 Yrs from DOCO and extendable on mutually agreed basis
4	Ramagundam STPS Stage-I & II NTPC SR-2100 MW	538.44 MW (25.64%)	01.03.1984 01.11.1984 01.05.1985 01.11.1988 01.09.1989 01.04.1991	22.03.1985	5 Yrs from DOCO and extendable on mutually agreed basis
5	Ramagundam STPS Stage-III NTPC SR III-500 MW	134.7 MW (26.94%)	25.03.2005	12.09.2001	5 Yrs from DOCO and extendable on mutually agreed basis
6	Simhadri STPS Stage-II (2x500 MW)- 1000 MW	223.5 MW (22.35%)	16.09.2011 30.09.2012	28.02.2007	25 Yrs from DOCO
7	Kahalgaon STPS Stage-I NTPC ER-840 MW	5.88 MW (0.70%)	01.01.1995 01.04.1995 01.02.1996 01.08.1996	01.10.1999	5 years from DOCO
8	Vallur Thermal Power Project (NTPC-TNEB Joint Venture)- 1500 MW Unit-I	1070.25 MW (71.35%)	29.11.2012	23.05.2009	25 Yrs from DOCO
	Unit-II		25.08.2013		
	Unit-III		26.02.2015		
9	Kudgi STPP (3x800 MW)- 2400MW	345.6 MW (14.40%)	31.07.2017 31.12.2017 15.09.2018	20.12.2010	25 Yrs from DOCO



NLC's GENERATING STATIONS

10	MAPS, Kalpakkam (2x220 MW)- 440 MW Unit-I	331.76 MW (75.40%)	23.07.1983	12.02.2008	15 Yrs from the Date of Agreement
	Unit-II		20.09.1985	20.09.1985 (DOCO of station)	
11	KAIGA, Atomic Power Station, Karnataka (4x220 MW) Units-I to IV Unit-I Unit-II Unit-III Unit-IV Unit-I & II (2x220)- 440 MW Unit-III & IV (2x200) 440 MW	230.81 MW 122.40 MW(27.82%) 108.41 MW (24.64%)	16.11.2000 16.03.2000 06.05.2007 20.01.2011	12.02.2008 20.01.2011 (DOCO of station)	15 Yrs from the Date of Agreement
12	Kudankulam (ATPS)- 2000MW Unit-I-1000 MW	1151.50 MW 589 MW (58.9%)	30.12.2014	12.09.2013	15 Years from DOCO
	Unit-II-1000 MW	562.50 MW (56.25%)	01.07.2015		
13	NLC TPS-II (630+840MW)	477.24 MW		05.03.2014	15 Years from the Date of Agreement
	Stage-I (210 MW x 3)- 630 MW	(191.64MW) (30.42%)	23.04.1988		
	Stage-II (210 MW x 4)- 840 MW	(285.6MW) (34%)	09.04.1994		
14	NLC TPS-I Expansion (2x210 MW)- 420 MW	226.33 MW (53.89%)	05.09.2003	05.11.2002	25 Yrs from DOCO
15	NLC TPS-II Expansion (500 MW) (2x250) Unit-I-250 MW Unit-II-250 MW	269.45 MW (53.89%) (134.72MW) (134.72MW)	Synchronised DOCO 22.04.2015	05.03.2014	25 Yrs from DOCO



16	NTPL Tuticorin(NLC-TNEB JV)- 1000 MW	418.2 MW (41.82%)			
	Unit-I-500 MW	(209.1 MW)	18.06.2015	16.12.2006	25 Yrs from DOCO
	Unit-II-500 MW	(209.1 MW)	29.08.2015		
17	NNTPS-1000 MW	327.45 MW (For Unit I) (65.49%)	29.12.2019	26.11.2010	25 Yrs from DOCO
			03.02.21		
18	NLC TPS-II 2ND EXPANSION- 1320 MW (2x660MW)	526.84 MW allotted as per MoP	DOCO SCHEDULED 2026-27	23.11.2015	25 Yrs from DOCO
<u>PROJECTS OF NLC FOR WHICH PPA'S TO BE SIGNED</u>					
19	NLC - TALABIRA - 2400 MW	1500	DOCO SCHEDULED FOR 2025-26	Approval accorded by Board. PPA to be executed.	--
20	NLC - RAGHUNATHPUR TPS- I - 600MW	150	xxxxxxxxxx	Project dropped as reported by NLCIL at present.	--



ALLOCATION DETAILS FROM IPPs

LTOA

Sl.No.	Name of the Company	Contracted Quantum in MW	Agreement Date	Agreement Period
1	Jindal Power Ltd, Chattisgarh	400	23-08-2013	01.02.2014 to 30.09.2028
2	D.B.Power Ltd, Chattisgarh	208	19-08-2013	01.02.2014 to 30.09.2028
3	Bharat Aluminium Company Ltd, Chattisgarh (I)	100	23-08-2013	01.02.2014 to 30.09.2028
4	Bharat Aluminium Company Ltd, Chattisgarh (II)	100	10-12-2013	01.06.2014 to 30.09.2028
5	Dhariwal Infrastructure Ltd, Maharashtra	100	27-11-2013	01.06.2014 to 30.09.2028
6	PTC India Ltd, Jharkhand	100	18-12-2013	01.06.2014 to 30.09.2028
7	KSK Mahanadi Power Company Ltd, Chattisgarh	500	27-11-2013	01.06.2014 to 30.09.2028
8	GMR Energy Trading Ltd, Maharashtra	150	27-11-2013	01.06.2014 to 30.09.2028
9	OPG Power Generation Pvt. Ltd, Gummidipoondi	74	12-12-2013	01.01.2014 to 30.09.2028
10	Coastal Energen Pvt. Ltd, Tuticorin	558	19-12-2013	01.06.2014 to 30.09.2028
11	IL&FS Tamil Nadu Power Company Ltd, Cuddalore	540	12-12-2013	01.06.2014 to 30.09.2028

Total 2830

MTOA

1	PTC-Pilot1	550	27-10-2018	01-04-2019 to 31-03-2022
2	Jaypee Nigrie Super Thermal Power Plant	50	Supply yet to be commenced	3 years from Date of Supply
3	SKS Power Generation Chattisgarh Ltd	100		
4	DB Power Ltd	100	20-01-2022	
5	MB Power (Madhya Pradesh) Ltd	150	Supply yet to be commenced	



TAMILNADU GENERATION AND DISTRIBUTION CORPORATION LIMITED

From

B.RAJESWARI, B.Com., FCMA.,

Chief Financial Controller /Regulatory Cell,

7th Floor, Western Wing,

144, Anna salai,

Chennai - 600 002.

To

The Secretary,

Central Electricity Regulatory Commission,

4th Floor, Chanderlok Building,

36,Janpath,

New Delhi – 110001.

Lr. No.CFC/RC/SE/CERC/EE1/AEE/F.GNA/D.184/22 dt:13.07.2022.

Sir,

Sub: TANGEDCO – Notification of CERC (Connectivity and General Network Access to the Inter-State Transmission System) Regulation, 2022 – Issues and impact of the Regulation – Reworking of GNA quantum – Requested - Regarding

Ref: CERC (Connectivity and General Network Access to the Inter-State Transmission System) Regulation, 2022 notification dated 07.06.2022

1) This letter has reference to the notification of Hon'ble CERC dated: 07.06.2022 on the CERC (Connectivity and General Network Access to the Inter-State Transmission System) Regulation, 2022.

2) In this regard, the facts, issues, discrepancies and impact of the above said regulations are brought to the knowledge of the Hon'ble Commission for kind consideration and perusal.

i. The draft Connectivity and General Network Access (GNA) Regulations was notified by CERC vide public notice dated 16.12.2021 to bring in radical changes in the present procedures being followed for grant of Connectivity and grant of LTA/MTOA and STOA in ISTS under the ambit of the Connectivity Regulations, 2009.

ii. TANGEDCO raised the following major concerns and views along with specific objections against some of the provisions in the draft regulations:

- a) The major issue was with respect to the methodology for assessing the deemed GNA. The Deemed GNA was assessed by considering 50% of maximum ISTS drawl in a time block during the year and 50% of average of maximum ISTS drawl in a time block in a day during the year. However from the actual data of ISTS drawl by TANGEDCO it has been observed that the maximum drawl occurred for **6 days, 14 days** and **34 days** for the years 2018-19, 2019-20 and 2020-21 respectively (maximum drawl occurred during different time blocks over the year attributed to many factors including short term drawal, occasional over drawals due to deficit in generation, huge deviation in RE dispatch and generation outages). Hence, considering 50% weightage for utilizing the transmission capacity for a particular time block of maximum drawal has resulted in skewed up quantum of GNA.
- b) Another important issue was that the peak drawl considered was inclusive of the drawl through the **Intra-State network owned by TANTRANSCO** from the Inter State Generating Station viz. MAPS, NLC TPS-II- Stage -I and II, NTECL Vallur, Kudankulam and NTPL. In this context, the implementing agency NLDC vide notification dated 31.01.2022 has excluded the deemed LTA quantum associated with MAPS, NLC TPS-II- Stage -I in the monthly bill of February 2022. Copy of the NLDC notification is enclosed as Annexure-1. Further vide notification dt: 17.06.2022 NLDC revised the transmission charges w.e.f January 2021 by excluding deemed LTA quantum associated with NLC TPS II Stage I and MAPS. Copy of the NLDC notification dt. 17.06.2022 is enclosed as Annexure-2. The **deemed GNA of 9177 MW** for TANGEDCO has been worked out in the draft Regulations based on the ISTS drawl **inclusive of the**

drawl through the state network as mentioned above despite the fact that the above quantum was excluded by NLDC.

- c) Further, it was requested to reassess the GNA based on the outcome of the Regulatory compliance petition filed by TANGEDCO before CERC for exclusion of quantity drawn through State network in respect of NLC TPS-II Stage-II, NTECL Vallur, KKNPP and NTPL. Hence, it was suggested as below:
- ✓ 100% of the average maximum drawal in a day during the year for the past three years may be considered.
 - ✓ The STOA quantum may be excluded as this would be considered under T-GNA.
 - ✓ The deemed GNA quantum of TANGEDCO shall have to be reworked by excluding the drawl through Intra-State network from CGS and also considering the above methodology.
3. Further, it was requested to make specific provision to allow the State owned Discoms to exit from GNA (LTA) on expiry of the PPA tied up with the LTA. In addition, other comments and views were also submitted. A copy of the comments and views of TANGEDCO is enclosed as Annexure-3
4. In continuation to the written submissions of comments, the concerns and views of TANGEDCO were presented during the public hearing held on 07.03.2022 through VC and requested the Hon'ble Commission to consider the views of TANGEDCO.
5. However in the CERC (Connectivity and General Network Access to the Inter-State Transmission System) Regulations, 2022 notified on 07.06.2022, it is observed that the submissions of TANGEDCO were not considered.
6. In this context, it is pertinent to submit that since the transmission charges are allocated in the Ratio of LTA/MTOA (new GNA) under the new

Sharing Regulations 2020, this skewed up GNA will have a recurring financial implications on Discoms forever.

7. In view of the above, it is requested that the Hon'ble Commission may be pleased to consider the genuine grievance of TANGEDCO and reassess the GNA quantum of TANGEDCO by excluding the quantity drawn through State network in respect of MAPS, NLC TPS-II Stage-I at first instance and in respect of NLC TPS-II Stage-II, NTECL Vallur, KKNPP and NTPL based on the outcome of the petition filed by TANGEDCO. The details of ISTS drawl points, Intra State drawl points considered as deemed ISTS, drawl points to be excluded along with quantum to be excluded in enclosed as Annexure- 4. Further, it is requested to make necessary provisions in the Regulations to allow the State owned Discoms to exit from GNA (LTA) on expiry of the PPA tied up with the LTA.

Yours faithfully,

B. Rajeswar
13/07/2022

CHIEF FINANCIAL CONTROLLER/
REGULATORY CELL

Encl: As above

Copy to Chief Engineer/Grid Operation/TANTRANSCO
Copy submitted to Member Secretary/SRPC/Bangaluru



TAMIL NADU GENERATION AND DISTRIBUTION CORPORATION LTD

From
B.RAJESWARI, B.Com., FCMA,
Chief Financial Controller /Regulatory Cell,
7th Floor, Western wing,
144, Anna Salai, Chennai-02
To
The Secretary,
Central Electricity Regulatory Commission,
4th Floor, Chanderlok Building,
36,Janpath,
New Delhi – 110001.

Lr. No.CFC/RC/SE/CERC/EE1/AEE/ F.GNA/ D.208 /22 dt: 22.08.2022.

Sir,

- Sub: TANGEDCO – Notification of CERC (Connectivity and General Network Access to the Inter-State Transmission System) Regulation, 2022 – Issues and impact of the Regulation – Exclusion of drawl through STU drawl nodes -Reworking of GNA quantum – Requested - Regarding
- Ref: 1) CERC (Connectivity and General Network Access to the Inter-State Transmission System) Regulation, 2022 notification dated 07.06.2022
2) Lr. No.CFC/RC/SE/CERC/EE1/AEE/ F.GNA/ D.184/22dt: 13.07.2022.

- 1) Kindly refer the letter cited under reference (2), wherein, it has been requested to exclude the quantum of power drawn through Intra-State drawl nodes (considered as ISTS drawl) for assessing the deemed GNA quantum as per the Regulation 18(1) of the CERC (Connectivity and General Network Access to the Inter-State Transmission System) Regulation, 2022.
- 2) In this context, based on the actual drawl data through TANTRANSCO network (treated as ISTS drawl) from CGS stations, the maximum ISTS drawal in a time block during the year for the period 2018-19, 2019-20 and 2020-21 and average of maximum ISTS drawal in a time block in a day during the year for



the period 2018-19, 2019-20 and 2020-21 have been reworked duly excluding the drawl through the State network during the respective blocks for the above three years. The deemed GNA worked out as per the formula stipulated by the Hon'ble Commission is furnished below:

ABSTRACT OF THE DEEMED GNA WORKING AS PER THE GNA REGULATIONS									
2018-19			2019-20			2020-2021			Deemed GNA
Yearly Average of Daily Max ISTS drawal (X1) (MW)	Yearly Max ISTS drawal (Y1) (MW)	A1= 0.5* X1 + 0.5* Y1 (MW)	Yearly Average of Daily Max ISTS drawal (X2) (MW)	Yearly Max ISTS drawal (Y2) (MW)	A2 = 0.5* X2 + 0.5* Y2 (MW)	Yearly Average of Daily Max ISTS drawal (X3) (MW)	Yearly Max ISTS drawal (Y3) (MW)	A3= 0.5* X3 + 0.5* Y3 (MW)	GNA (MW)= Average of A1 A2 & A3 (MW)
5899.82	8325.21	7112.51	6424.30	8838.83	7631.57	6498.85	10166.49	8332.67	7692.25

3) The details of the Intra State drawl nodes to be excluded for the computation of deemed GNA, Single line diagram of the switchyards showing the SEM meter locations in Intra State drawl points are enclosed as Annexure-1 and Annexure-2 respectively. The block wise ISTS drawl data (inclusive of Intra State drawl nodes), block wise drawl data through Intra State nodes (treated as ISTS drawl) for the years 2018-19, 2019-20 and 2020-21 are submitted through email(soft version).

4) Further, CTU vide letter dated 03.08.2022 has furnished the details of proposed bifurcation of deemed GNA quantum of the States and other entities within and outside the region based on the LTA/MTOA contracts /CGS power allocation for the billing month of July 2022 as mandated under the GNA Regulations. In the said notification, the deemed GNA for TANGEDCO is mentioned as **9177 MW**. It has been requested to furnish our comments and observations on the bifurcation notification.



- 5) In this regard, it is requested that the deemed GNA of TANGEDCO may be re-fixed as **7692 MW** after duly excluding the drawl through State drawl nodes via State owned transmission lines connected to the bus bar of the CGS Stations.
- 6) It is also requested to issue suitable directions to the nodal agencies viz. CTUIL and POSOCO for considering the revised the deemed GNA quantum for the purpose of bifurcation of GNA as well as computation of transmission charges and losses on implementation of the GNA Regulations,2022.

Yours faithfully,

B. Jayeswar
22/08/22

Chief Financial Controller /Regulatory Cell

Encl: As above

Copy to

The Chief Operating Officer/ CTUIL, Plot No.2, Sector-29, Gurgaon-122 002
The Director (Market Operation), POSOCO, B-9 (1st Floor), Qutab Institutional Area,
Katwaria Sarai, New Delhi -110016

Copy to The Member Secretary/SRPC, 29, Race Course Cross Road, Bengaluru,
Karnataka -560009

Copy to the Chief Engineer/ Grid Operation/ TANTRANSCO, Chennai -2