

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

**Suggestions on behalf of RLDCs/NLDC**

# **1. Transmission charges for T-GNA**

Regulatory Provision -

The Regulation 34.2 provides as follows:

“Transmission charges for T-GNA, in case of bilateral and collective transactions, shall be payable only at point of drawal, as per the last published Transmission charge rate for T-GNA for the State where such point of drawal is located: *Provided that under collective transactions, transmission charges for T- GNA shall be payable for drawal schedules more than GNA quantum or T-GNA quantum or both, as applicable.*

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

## **Observations -**

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

## **Cond...**

- The application of transmission charge on post facto basis is not conducive to efficient operations of the electricity market, particularly in Power Exchange market.
- The transmission charges should be known upfront by the market participants to take informed decisions.

## **Suggestion -**

In order to facilitate efficient operation of the market, upfront charges may be made applicable for participation in STOA and suitable credit/adjustment/refund may be made against the total transmission charges payable by the entity as per the GNA quantum by CTU.

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

During the last 2 years, high demand growth and high demand has been experienced. Accordingly, now that the implementation is going to happen in the year 2023, the data for years 2019-2020, 2020-2021 and 2021-2022 may be considered for computation of the deemed GNA quantum

### **3. Allocation of Transmission Margin on (S-1) day**

- As per the principal regulations 29.4, exigency applications received after 1300 hrs of (S-1) day shall be processed within 4-time blocks, on first-come first-served basis.
- As per draft IEGC clause 46.4.b SECURITY CONSTRAINED UNIT COMMITMENT (SCUC), upward revision of requisition by beneficiaries is open from 14:00 Hrs till 1630 hrs of D-1 in case the power plant schedule goes below minimum turndown level for some or all-time blocks of the D day.
- Thus processing of T-GNA applications starts from 14:00 Hrs onwards and is concurrently running with the window for upward revision by the beneficiaries till 16:30 Hrs.
- Accordingly, it may so happen, that long term may get curtailed on account of T-GNA or because of non-availability of clarity in the margins, a valid T-GNA application may get rejected.

## Suggestion -

Accordingly, the following change is proposed:

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

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

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

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Thanks...