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To,
The Secretary,
Central Electricity Regulatory Commission
3 rd & 4 th Floor, Chanderlok Building,
36, Janpath, New Delhi- 110001

Date: 13/03/2023.

Respected Sir,

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

Ref.: Public Hearing held on 13th March, 2023.

Thank you very much for giving an opportunity to make the Company's suggestions / comments in today's public hearing held on the Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (First Amendment) Regulations, 2023.

Brief background of the Company:

The Company is engaged in multiple businesses including manufacturing and dealing in paper and paperboards, personal care products, products for human consumption, hotel business and tobacco etc. The Company has PAN India businesses and operations which it carries out through its various units across India.

The Company also made an investment in 46 MW Windfarm in the State of Andhra Pradesh. The Wind power generated being used for its units in PAN India under captive use through short-term interstate open access (ISOA). The said open access being availed as per the prevailing Central Electricity Regulatory Commission (Open Access in inter-State Transmission) Regulations, 2008.

As the Wind power generation is seasonal, the Company is compelled to avail short-term open assess on monthly basis as per the forecasted generation of the month.

The Company's suggestions / comments:

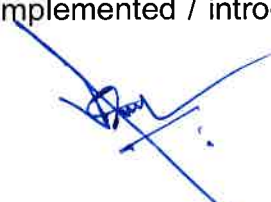
Though the Company's comments / suggestions are not specific to this proposed amendment, it is requested that, the following may be considered at the appropriate time to introduce in the GNA / T-GNA Regulation of CERC.

1. Grant of GNA for wheeling of all types of Renewable energies under captive use shall have an option to vary its capacities from time to time based on peak and Non-Peak generation periods of RE Power plants instead of uniform / fixed capacity through the GNA duration.

Example: The peak Wind season of any wind power plant is during the months of June to August and the rest of nine months are non-peak Wind season. The PLF of the wind power plant during the peak Wind season months is around 50 to 60%, whereas as the PLF during the non-peak Wind season months is around 15% only. Therefore, it is essential to have GNA for different capacities during the peak and non-peak Wind season to make it Wind power plant financially feasible for wheeling Wind energy for its captive use.

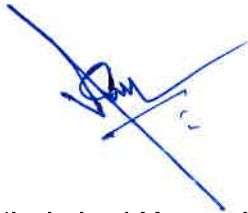
2. It is requested to implement / introduce the procedure for captive wheeling of both fossil fuel as well as for renewable energy for sustainability of the industry under the Regulation for GNA & T-GNA.

Example: There is no specific procedure for wheeling of energy for captive use, which is forcing the captive user to follow the procedure laid down for the bilateral open access transactions through there is no buyer and seller in the transaction. Like demanding PPAs, affidavits and NOC's (No Objection Certificates) for processing the application/s. Therefore, it is requested to exclude the procedure for captive wheeling from the open access and a separate procedure may be implemented / introduced for captive wheeling to avoid cumbersome process.



3. An option shall be provided in the GNA & T-GNA transaction/s to select the type of transaction, i.e. captive / non-captive?. Which shall be similar to the existing provision for RE Power /non-RE power in the NOAR Portal.
 - a. If, the transaction is a captive, the documentation relaxation/s and/or any priority allocation shall be considered.
 - b. It is also requested to implement / introduce the procedure in GNA & T-GNA transactions for recognizing the captive status of the plant/s as per the Electrical Rules,2005 by tracking its aggregate generation of the plant and its transaction/s.

Thanking You,
For ITC Limited - Paperboards & Specialty Papers Division.



(Lakshmi Kumar V)
Manager – Energy.