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Sent: Monday, December 2, 2024 5:06:16 PM

Subject: CERC's Staff paper on modifications on GNA regulations-Comments of APPCC-regd

Sir/madam,

Please find the comments of APPCC on Staff paper on modifications on GNA regulations as notified by Hon'ble CERC.

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Regards,

O/o DGM/CGS & PGCIL/APPCC

Comments from APPCC on CERC's staff paper on modifications in the GNA regulations

Issue No. 1: Substitution of GNA quantum under Regulation 17.1(i) to Regulation 17.1(iii) to the GNA Regulations

Substitution of GNA under regulation 17.1(i) to 17.1(iii) may lead to redundant capacity in STU network and the capital expenditure incurred by STU will not be put to useful use. And the present deemed GNA which was arrived by taking the drawl of the state into account, also indirectly includes the drawl by the intra state drawl entities connected STU/discos. The option of substituting the GNA quantum under Regulation 17.1(i) to the regulation 17.1(ii) does not require any new network and it is just the direct liability that changes. Hence both the scenarios (17.1(ii) & 17.1(iii)) are different in respect of commercial impact. Hence this change may not be proposed.

Issue No. 2: Use of GNA of a Connectivity grantee by an entity connected with an intra-State network that is not a GNA grantee

This change will facilitate the optimal use of the network and also encourage the states having excess GNA during off peak seasons to optimize their ISTS charges by giving its GNA to other entities. The same can be done if there is no requirement of additional capital expenditure/augmentation of ISTS network, if not it would increase the cost burden on the existing/original GNA grantees. Also, the liabilities and other commercial implications has to be modified accordingly. If the entity which is not a GNA grantee(Entity-B) chooses to use the GNA of an entity or Discom located in other state in the same region, and if the entity is connected to STU network, then the RTDA calculations are to be modified as per the GNA quantum that was transferred between the both entities.

The prior approvals/NoC of the STU/Discoms should be mandated for such transfer of GNA between such entities and the entity which is a GNA grantee (Entity-A) which intends to transfer its GNA to other entity that is not GNA grantee (Entity-B), then such Entity-A shall be made to submit an undertaking to STU/Discom for paying the RTDA charges if the entity draws power more than its remaining GNA quantum.

To encourage the use of RE power, waiver may be given to the entity which has the liability of GNA charges. If the liability of transmission charges lies with the original GNA grantee(Entity A) then the if the entity B draws power from RE sources, the waiver of transmission charges should be considered. Whether the waiver will be passed on to Entity-B by the Entity-A lies on the Terms and Conditions agreed on mutual terms between the two entities.

Issue No. 3: Dual Connectivity to the Bulk Consumer for the same load capacity

If availing RE power is the primary reason for the bulk consumers for requesting the dual connectivity, then it is to submit that, the same can be availed now also in the present regulations under

the clauses 17.1(i) & 17.1(ii). Bulk consumers can avail RE power through ISTS by availing GNA/GNA_{RE} continue to stay connected to STU network also under regulation 17.1(ii).

The state's GNA already has the drawls of the bulk consumer included. If the option of dual connectivity is given to the bulk consumers, it would create a redundant network in the system and this implies huge commercial impact and also has many operational difficulties. With the increasing RE penetration in the GRID, there are already a lot of redundant lines in the existing network. Hence, to avoid further increase in the redundancy this proposal may not be considered.

Issue No. 7: Provision for grant of Solar hours Connectivity and Non-Solar hours Connectivity through the same Transmission system

This provision if provided would definitely put the unused transmission capacity in the Non-solar hours to good use. The existing solar generators may also be given an option to install the grid level storage capacities at the same location/nearby location with connectivity to the already existing SS or Pooling station for using the same system during non solar hours. This will also facilitate the state discoms to optimize the ISTS charges and aid to increase the RE percentage waiver.

In addition to the above, it is requested to analyze the possibility of continuing the existing waiver percentage if the storage capacity is installed by an existing solar generator.

Illustration:

If the entity(E-1) scheduling power from existing solar generator (SG-1) is eligible for 100% waiver of the ISTS charges as per the relevant regulations in vogue, the same percentage(100%) of waiver may be given for the entity (either E-1 or any other entity) for scheduling power from ESS installed by solar generator (SG-1). The reason for this proposal being that, since there is no additional huge augmentation requirement (as no new ICTs, other equipment etc would be required) for the said ESS to be connected, the existing waiver percentage may be continued. This is would definitely encourage installation of more ESS in the grid.

Issue No. 8: Provision for Minimum Transmission Capacity Utilisation for Hybrid ISTS Connectivity

The unutilized capacity may still be further divided into solar and non-solar hours utilization. After evaluating the under-utilized capacity the existing connectivity grantee may first be given an option for putting up the generation system which complements the existing usage pattern (i.e utilizing the line for unutilized time), if the existing generator doesn't wish to opt for the same, then any other entity may be given an option for installing any complementary generation scheme to the existing system for connecting to the under-utilized Hybrid ISTS (either Pumped Hydro or BESS) depending upon the suitability.

The waiver percentage may be considered in similar manner as suggested in the issue No:7 above.