Dated: December 02, 2024

Reference: Apraava/ Regulatory & Policy/Comments/2024/04

To,
Shri Harpreet Singh Purthi,
Secretary, Central Electricity Regulatory Commission,
8th Floor, Tower B, World Trade Centre,
Nauroji Nagar, New Delhi, 110029

Subject: Comments on "**Staff Paper on modifications in the GNA Regulations**" (hereinafter referred to as **"Staff Paper"**)

Respected Sir,

By way of an introduction, Apraava Energy Private Limited (Apraava) is a diversified power company in India, owning and operating multiple renewable energy project, transmission assets and Advanced Metering Infrastructure projects.

The Hon'ble Commission vide public notice (No. L-1/261/2021/CERC) dated 09.10.2024 invited comments / suggestions / Objections on the subject Staff Paper. Our comments on the same has been enclosed as **Annexure I**.

We request the Hon'ble Commission to take our views on record.

Thanking you
Yours Sincerely,

Jogendra Behera
Head - Regulatory Affairs and Policy Advocacy

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Annexure I

We welcome the Hon'ble Commissions effort to notify the **Staff Paper on modifications in the GNA Regulations**. With regards to the **Staff Paper** our Comments are as below:

Issue No	Issues raised in the Staff Paper	Comment/Suggestion
1	Substitution of GNA quantum under Regulation 17.1(i) to Regulation 17.1(iii) to the GNA Regulations	We welcome the suggestion.
2	Use of GNA of a Connectivity grantee by an entity connected with an intra-State network that is not a GNA grantee.	We welcome the suggestion.
3	Dual Connectivity to the Bulk Consumer for the same load capacity	We welcome the suggestion.
4	Provision of Conn BG-2 for Bulk Consumer	Provision of Connectivity BG for bulk consumer need to be kept similar to the provision of generator from the point of ensuring utilization of transmission system. Conn BG-2 will push Bulk consumers to come in the matching timeframe of required transmission system. Further, the transmission charges should be billed from the transmission charges pool not on a bilateral basis. Recovery from transmission charges pool ensures timely recovery without any dispute.
5	Utilization of the Connectivity granted to a subsidiary by another subsidiary of the same Parent company.	We welcome the suggestion to allow Utilization of the Connectivity granted to a subsidiary by another subsidiary of the same Parent company similar to the provision of utilization of connectivity granted to subsidiary by parent and vice versa.

		Further, we suggest transfer of connectivity granted to a subsidiary by another subsidiary of the same Parent company should also be allowed post COD similar to the existing provision (Regulation 15) allowed for transfer of connectivity between subsidiary and parent and vice versa.
6	Platform for providing NOC by the STU in a time-bound and a transparent manner	We welcome the suggestion of creating Platform for providing NOC by the STU in a time-bound and a transparent manner.
7	Provision for grant of Solar hours Connectivity and Non-Solar hours Connectivity through the same Transmission system Challenges in expanding ISTS and integrating RE	**Clarity on Auxiliary consumption by Solar Project and Charging by Storage project:** Auxiliary consumption by solar project during non-solar hour and drawal by standalone energy storage project during solar hour are requirement of project. The question arises here is (i) Whether Solar project developer need to take non-solar hours Connectivity separately for the purpose of Auxiliary consumption and (ii) Whether standalone energy storage project developer need to take Solar hours Connectivity separately for the purpose of Charging during the solar hours. Since the charging of standalone energy storage during solar hour and drawal of auxiliary consumption by Solar project developer during non-solar hour is decongesting the node where connectivity has been granted. So, we request Hon'ble Commission to consider it under a single application of grant of connectivity not through two different applications. **Clarity on Solar hour:**

		Solar hour varies with respect to location (latitude and longitude) and season because of variation in sunrise angle and sunset angle as per solar geometry. So, we request Hon'ble commission to define the **Solar Hour** along with reference time for the purpose of clarity. **Reduction in BG in commensuration with Connectivity hour:** Since the connectivity quantum will be released for non-solar hour which may be utilized by other projects, the developer may be provided incentive in terms of reduced BG in commensuration with reduced Connectivity hour. This will align the interest of the developer with the system requirement. Following modalities may be adopted for the reduction of connectivity BG: 1. **For Projects yet to be bided:** Conn-BG need to be reduced proportionately. 2. **For Under Construction Project:** Conn-BG need to be returned proportionately. 3. **For Commissioned Project** (not yet completed 5th Anniversary of Commissioning): Balance Conn-BG may be returned proportionately. **Utilization of non-solar hour connectivity by the existing connectivity grantee:** Staff paper has raised a query regarding whether existing solar generators (without storage) be given the option to install storage for utilisation of connectivity/GNA during non-solar hours by submitting an application to CTUIL within three months" With regard to above, we suggest allowing minimum one year time to existing solar generators for requesting utilisation of connectivity/GNA during non-solar hours instead of 3 months. Minimum one business cycle is required by any organization to decide any

		investment and getting the approval of the same at different level of management including Board approval. **Option to allow different connectivity quantum across solar and non-solar hours:** Commission has considered solar hour connectivity for solar projects. In addition to this the Hon'ble Commission may like to provide flexibility to the developer in specifying different Connectivity across Solar and non-solar hours for wind, ESS, PSP and hybrid projects for better utilization.
8	Provision for Minimum Transmission Capacity Utilization for Hybrid ISTS Connectivity	CUF requirement depends on tenders and same has to be ensured by developer by combining different technologies such as solar, wind, storage etc. So, we request Hon'ble Commission to avoid mandating a Minimum CUF requirement through Regulation as the same has financial implication. Instead of mandating the developers, ideally CTU should undertake study based on generation profile including CUF, seasonal and daily variation, coincident & non-coincident peak etc. and design the system accordingly for maximizing the capacity utilization. CTU can also specify the technology mix along with other conditionalities such as minimum CUF etc. at a particular substation on the basis of which REIAs (SECI, NTPC, NHPC etc.) may call for the bid. CTU is better positioned to ensure development of an efficient, co-ordinated and economical system of inter-State transmission lines for smooth low of electricity from generating stations to the load centres. Developer should not be burdened with the requirement of improving the system utilization by mandating CUF or curtailment of connectivity, which will lead to in any case suboptimal solution.