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Date: 11.11.2024

To,
The Secretary,
Central Electricity Regulatory Commission,
7th Floor, Tower B, World Trade Centre,
Naurojinagar, New Delhi- 110029

**Ref: CERC notice No. L-1/261/2021/CERC**

**Subject: Regarding Comments on CERC Staff Paper on modifications in the GNA Regulations.**

Dear Sir,

This is with reference to the above subject wherein Hon'ble Central Commission by way of the Notice cited under ref above dated 09.10.2024 sought comments on the Staff Paper on Stakeholder's suggestions for necessary modifications in the GNA Regulations, based on developing requirements of the power sector.

Thus, Bharat Aluminium Company Ltd, Korba hereby submits comments on the staff paper.

Thanking you.

Yours faithfully,

For Bharat Aluminium Company Ltd.

(Signing Authority)

# COMMENTS ON CERC STAFF PAPER ON STAKEHOLDER'S SUGGESTIONS FOR NECESSARY MODIFICATIONS IN THE GNA REGULATIONS

1. **ISSUE NO. 1:** Substitution of GNA quantum under Regulation 17.1(i) to Regulation 17.1(iii) to the GNA Regulations.

i) Whether such substitution of GNA quantum under Regulation 17.1(i) to GNA /under Regulation 17.1(iii) should be allowed?

**Suggestion: The proposed substitution of GNA is a welcome step and shall have to be allowed. This shall surely enhance the optimal utilisation of transmission network and shall reduce the redundancy of additional network requirement. Hence the scope of substitution of GNA from 17.1 (ii) is to be extended to 17.1 (iii).**

ii) If such substitution is allowed, should it be coupled with the following conditions:

a) The entity shall submit the NOC from the STU.

b) The entity shall be liable for payment of the charges of the intra-State network or relinquishment charges, as applicable.

c) The entity shall be radially connected with the ISTS as 17.1(iii) entity

**Suggestion: The proposed GNA substitution should be allowed; however, the applicability of above proposed condition cannot be applied universally on all the entities covered under 17.1 (iii).**

**As such in case of Distribution licensee it is logical and making sense to produce NOC from STU with payment of relinquishment charges to the extent of such substituted GNA quantum. However the other entities, i.e. bulk consumers who are either connected directly to ISTS or transitioning from an intra state entity to an ISTS connected entity and seeking additional GNA or GNA cannot be laden by such conditions. Moreover, to be eligible as an entity covered under regulation 17.1(iii) it is mandatory to be radially connected with the ISTS.**

2. **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.

i) Whether such utilisation of GNA of a GNA grantee can be allowed by an entity that is not a GNA grantee?

**<u>Suggestion:</u> Utilisation of GNA of a GNA grantee can be allowed by an entity that is not a GNA grantee by paying nominal one time utilisation fee to CTUIL along with regular transmission charges by the primary holder of GNA.**

ii) If such use is allowed, should it be coupled with the following conditions:

a) Such request to be made along with the NOC from the STU towards availability of space in the intra-State network for such quantum of GNA and period

**<u>Suggestion:</u> The above condition may be applicable to the cases where the need of additional power is required by any GNA seeker however in the case of RPO compliance the same is not applicable as the obligated entity is not required additional RE power but to procure RE power to the extent of mandatory percentage of its total consumption hence the requirement of power will not enhance. Therefore, this condition cannot be universally applicable to all GNA seekers.**

b) Such request for utilisation of GNA shall be from an entity located in the same State or same region as that of the GNA grantee. The additional conditionalities that need to be imposed for considering the GNA utilisation beyond the state.

**<u>Suggestion:</u> Keeping the utilisation of GNA within the state will not serve the intent of the proposed views. It is suggested that initially this shall be allowed within the region and basis the outcome of this scheme the same can be implemented across the country.**

c) Such request should only be allowed based on the margin available in ISTS, and no augmentation in the ISTS is to be made to facilitate such use of GNA.

**<u>Suggestion:</u> It is agreed that such request shall be allowed subject to the availability of margin in ISTS however the augmentation of network shall have to be subject of duration and quantum of GNA usage.**

d) Such utilisation shall be restricted to GNA only and not GNARE.

**<u>Suggestion:</u> Usage of GNA shall not be restricted up to GNA only, GNAre can also be offered for usage.**

3. **ISSUE NO. 3:** Dual connectivity to the Bulk Consumer for the same load capacity

a) Whether such grant of GNA to Bulk Consumer through dual connectivity, i.e. for the same load capacity should be allowed or not ?

**<u>Suggestion:</u> It is suggested that dual connectivity to the Bulk Consumer for the same load capacity shall have to be allowed.**

b) If such a grant of GNA to Bulk Consumer through dual connectivity is allowed, can it be coupled with the following conditions:

i. NOC of the STU based on the commitment of bulk consumers to pay the applicable charges of the intra-State network if the applicant is already connected with the intra-State network and seeking GNA through direct connectivity with ISTS?

ii. Commitment of bulk consumer to pay the applicable charges of ISTS if the applicant is already connected with the ISTS and seeking connectivity to the intra-State network.

iii. Should only those Bulk Consumers be granted GNARE from ISTS, which is drawing only RE power through the intra-State network also. Further, after the granting of GNARE, if the user starts drawing non-RE power through the intra-State network, its GNARE may be converted into GNA with a waiver of the ISTS charges as applicable for GNA in terms of the Sharing Regulations, 2020.

**<u>Suggestion:</u> It is submitted that if the bulk consumer is directly connected to ISTS network through its dedicated transmission line only through ISTS network in such cases payment of charges for intra state transmission network is not justified.**

**Restriction of dual connectivity for GNAre to only those consumers who draws only green power through intra state network will not serve the purpose of proposed dual connectivity provision. It is prevalent that availability of Green Power across the country is skewed with few of the state. Thus, RTC availability of green power during non-RE period is not certain in every state. Further, this shall be relevant to only those consumers who need 100% RE power for their consumption and consumers who requires consistent and economic power for their load could not apply for dual connectivity.**

4. **ISSUE NO. 4:** Utilisation of the Connectivity granted to a subsidiary by another subsidiary of the same Parent company.

**<u>Suggestion:</u> The proposed clause is welcome step and implementable with some conditionalities like; connectivity status and location of the subsidiaries of the parent company. It is to be clarified that whether parent company has any significant role in switching of connectivity by its subsidiaries. Does parent company and subsidiaries are required to be located within the same region/state.**

5. **ISSUE NO. 5:** Platform for providing NOC by the STU in a time bound and a transparent manner.

whether such a centralized online platform is required to be implemented for processing the application for grant of NOC by the STU in terms of availability of transmission capacity in the intra-State network?

**<u>Suggestion:</u> It is admitted fact that getting NOC from STU is a quite a cumbersome task since there is no such standard guidelines/rules or SOPs for issuance of NOC by STU.**

**Introduction of common platform and a standard procedure for issuance of NOC by STU shall make the NOC issuance process easy and time saving.**

6. **ISSUE NO. 6:** Provision for grant of Solar hours Connectivity and Non-Solar hours Connectivity through the same Transmission system.

**Suggestion: The above proposal of solar Hr connectivity and non -solar Hr connectivity of the transmission system is an appreciable steps. It shall definitely enhance the capacity utilisation of transmission system which is currently unutilised during non-solar Hours. The enhanced capacity utilisation will reduce the per unit cost of transmission among all category of consumers.**

**However, the billing of charges applicable for the solar hour and non-solar hour connectivity is not clarified in the proposed staff paper. Currently, applicant pays charges based on quantum of connectivity irrespective of transmission capacity usage hours. Hon'ble CERC may kindly allow the bulk consumer to pay the transmission charges for actual usage of the corridor.**

7. **ISSUE NO. 7:** Provision for Minimum Transmission Capacity Utilisation for Hybrid ISTS Connectivity

**Suggestion: The above clause proposed to reduce the connectivity quantum basis the minimum utilization of transmission capacity by (at least 50%) RHGS with effective from 1st October 2026 alternatively the quantum of connectivity equal to the average of maximum injection in any time block of a day over the year (first year after the declaration of COD) may be allowed to be retained by the Connectivity grantee, and the balance quantum of the part of the Connectivity may be revoked (with corresponding Conn-BGs to be returned). It suggested to adopt the latter option as the actual power generation profiles of RHGS i.e. Solar and wind is to be predictable in over a year. Further no charges are to be levied on connectivity grantee for such revocation of connectivity quantum.**