



सेंट्रल ट्रान्समिशन यूटिलिटी ऑफ इंडिया लिमिटेड

(पावर ग्रिड कॉर्पोरेशन ऑफ इंडिया लिमिटेड के स्वामित्व में)

(भारत सरकार का उद्यम)

**CENTRAL TRANSMISSION UTILITY OF INDIA LTD.**

(A wholly owned subsidiary of Power Grid Corporation of India Limited)

(A Government of India Enterprise)

**Ref. No.:** CTU/CERC/GNA/Staff-paper

**Date:** 02-12-2024

**The Secretary**

Central Electricity Regulatory Commission

7<sup>th</sup> Floor, Tower B, World Trade Centre,

Nauroji Nagar, New Delhi- 110029

**Sub: Staff Paper on modifications in the GNA Regulations – reg.**

Sir,

This is with reference to CERC Public Notice No. L-1/261/2021/CERC dated 09.10.2024 inviting comments on the staff paper on modification in GNA Regulations.

Towards this, comments and suggestions on the staff paper are enclosed at **Annexure-I**.

Thanking you,

Yours faithfully,

*Ashok Pal*

**(Ashok Pal)**

COO(CTU)

**Encl.:** A/a

## CTU Suggestions on issues raised in the Staff Paper

### 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?

**CTU Inputs:** *No. It may result into development of new ISTS for direct supply of power to entity under Regulation 17.1(iii) as well as non-utilisation of ISTS for supply of earlier GNA quantum to entity under Regulation 17.1(i). This may only be allowed along with relinquishment charges for reduction of GNA quantum by entity under Regulation 17.1(i).*

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

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

**CTU Inputs:** Yes

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

**CTU Inputs:** Yes

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

**CTU Inputs:** Yes

### 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?

**CTU Inputs:** *Yes, if the entity is listed in GNA segregation list by the state and corresponding bill is being issued to that entity.*

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

**CTU Inputs:** Yes

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.

**CTU Inputs:** Use of GNA by other GNA grantee(s) [under Regulation 23] is permissible within the same region in accordance with GNA detailed procedure. Same philosophy may be applied in this case.

- 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.

**CTU Inputs:** Yes. The philosophy would be same as the other cases of use of GNA by other GNA grantee(s).

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

**CTU Inputs:** Yes. As GNA-RE is a special product for drawl of only RE power. The same may be difficult to maintain in such cases.

### **Issue No 3 Dual Connectivity to the Bulk Consumer for the same load capacity**

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

**CTU Inputs:** This may be allowed as unlike generation projects, bulk consumers pay transmission charges corresponding to GNA quantum in ISTS and open access in intra-state system.

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

- a. 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?

**CTU Inputs:** Yes. STU NoC should be mandatory for such cases.

- b. 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.

**CTU Inputs:** Yes. Commitment of bulk consumer shall be there for payment of transmission charges for ISTS.

- c. 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.

**CTU Inputs:** *GNR<sub>RE</sub> is for drawl of RE power from ISTS. Drawl of RE or non-RE power through intra-state connections is prerogative of Bulk Consumer and STU. With Dual connection, Bulk Consumer can source/schedule RE power from ISTS and RE/non-RE from intra-state. Waiver in ISTS for GNA<sub>RE</sub> can be calculated on scheduled/drawn RE power from ISTS, as both ISTS and intra-state feeders shall be metered. Accordingly, bulk consumer having connection with STU may also be allowed for grant of GNARE from ISTS.*

#### **Issue No 4 Provision of Conn BG-2 for Bulk Consumer**

- i. Whether the implementation of the system for providing connection to the ISTS for the grant of such GNA to the entity covered under Regulation 17.1(iii) should be implemented as ISTS under TBCB/RTM, for which the concerned entity shall submit Conn-BG2?

**CTU Inputs:** *Yes. It is not advisable to allow private developer(bulk consumer) to construct ISTS and therefore the ISTS may be implemented under TBCB/RTM for which concerned entity shall submit Conn-BG2 (for ATS/Terminal Bays) and Conn-BG3 (for augmentation without ATS/Terminal Bays) in line with generation projects. These BGs can be returned to the bulk consumers in five years' timeframe. In this regard it may be mentioned that Bulk consumer may not be allowed to seek connectivity to ISTS only for 11 months as any augmentation in the transmission system to be carried out for such cases may remain unutilised after such a small time period. It is therefore suggested that minimum time period for seeking connection to ISTS by entity covered under Regulation 17.1(iii) may be enhanced from 11 months to 60 months.*

- ii. Whether post construction under ISTS, transmission charges for such ATS or dedicated elements like ICT, etc, should be bilaterally billed to such Bulk Consumer or should be considered under the transmission charges pool?

**CTU Inputs:** *It should be billed as per provision of sharing regulations as done for other DICs i.e. it may be considered under transmission charges pool.*

- iii. Should charges of such system for providing connection to the ISTS, to be constructed under ISTS, be paid by the entities under GNA/GNARE where more than 50% of the transmission charges are waived off ?

**CTU Inputs:** *Transmission charges shall be governed as per waiver policy.*

**Issue No 5 Utilisation of the Connectivity granted to a subsidiary by another subsidiary of the same Parent company.**

Whether such utilisation of Connectivity among the different subsidiaries of the same Parent company should be allowed or not?

***CTU Inputs:** Hon'ble Commission vide Order dated 12.05.2024 in Petition No. 9/MP/2024 has clarified the term "utilization of Connectivity" in the referred Regulations as injection or drawl of power by the project as project implementing subsidiary sometimes needs Connectivity for the purpose of injection/drawl of power. Different subsidiaries of the company may be implementing different projects at different locations and would not be feasible to utilize Connectivity of each other for the purpose of injection/drawl of power. As such, utilization should be restricted between Parent company and its subsidiary who is implementing the project.*

**Issue No 6 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?

***CTU Inputs:** Application for grant of NOC may be implemented on NSWS portal which is currently hosting approvals from 32 Central Departments and 29 State Governments.*

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

***CTU Inputs:** Provision may be provided considering the technical assessments to evaluate the feasibility of this approach for different grid configurations & scenarios and providing guidelines and standards for governing the present Solar connectivity and disconnection procedures in non-solar hours, including requirements for grid operators and generators.*

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

whether the minimum annual capacity utilization of the Connectivity by the RHGS should be mandated or not as per proposal.

***CTU Inputs:** The applicant for hybrid projects to submit the analysis curve of injection of solar and wind power in the grid at that particular location depending on temperature and wind profile for that location. Total connectivity shall not exceed the value of maximum combined injection (solar+wind).*

Further, if the maximum power injected into the ISTS is less than 95% of the connectivity capacity granted for a period of two years subsequent to commissioning of the granted connectivity capacity, then the connectivity capacity would be reduced to the maximum injected capacity and the quantum of reduced connectivity capacity would be allocated to new applicants.