CAPTIVE POWER PRODUCERS ASSOCIATION
(Registered U/sec. 25 of Company Act 1956 & Certificate of IT 12AA
CIN: U91990MH2003GAP141611)

Secretariat Office
Technocraft Industries (India) Ltd.
Technocrat House A-25 MIDC, Marol Andheri (East),
Mumbai 400093
Contact: Nitin Ghorpade, Director
Email: nitinghorpade4243@gmail.com
Contact No. 9967013135

Vikas Patangia
PRESIDENT

Date: 11th November 2024

To, Secretary
Central Electricity Regulatory Commission
7th Floor, World Trade Centre,
Tower B, Naurojinagar, New Delhi-110029
Email: secy@cercind.gov.in; shilpa@cercind.gov.in.

Subject: Suggestions /Comments on Staff Paper on CERC Connectivity and GNA Regulations.

Dear Sir,
In response to your public notice dated 9th October 2024 inviting suggestions and comments from the stakeholders on 'Staff Paper on CERC Connectivity and GNA Regulations, we would like to submit our suggestions as per the enclosed Annexure-I for your kind consideration.

Thanking you.
For CAPTIVE POWER PRODUCERS' ASSOCIATION

Nitin S. Ghorpade
Director (CPPA)

Annexure-I: - Suggestions /Comments on Staff Paper on CERC Connectivity and GNA Regulations

Sr. No.	Issue No of Staff Paper	Suggestion / Comment	Rationale
1.	Issue No. 1: Substitution of GNA quantum under Regulation 17.1(i) to Regulation 17.1(iii) to the GNA Regulations	Substitution of GNA quantum under Regulation 17.1(i) to GNA/under Regulation 17.1(iii) should be allowed subject to 1. The entity shall submit NOC from the STU. Such NOC shall be not denied if there is capacity available in State Network. 1. The entity shall be radially connected with the ISTS as 17.1(iii) entity	By allowing this substitution, spare capacity available with STU can be availed and utilised by entities under 17.1(iii) and will ensure optimal utilization of ISTS The proposal is shifting of GNA from STU on behalf of bulk consumer or distribution licensee to bulk consumer or distribution licensee as the case may be. Once bulk consumer is getting connected with ISTS directly there shall be no need to pay STU charges and there shall not be any relinquishment charges since GNA quantum remains the same.
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	Utilisation of GNA of a GNA grantee should be allowed by an entity that is not a GNA grantee, coupled with below conditions 1. Such request to be made along with NOC from the STU 2. Such request for utilisation of GNA shall be from an entity located in the same region as that of the GNA grantee. 3. Such utilization to be allowed for GNA as well as GNA RE Waiver of transmission charges should be allowed in such cases For Example If entity 'B' draws power from RE resources them the GNA grantee 'A' should be allowed waiver in respect of such RE power drawl.	Currently use of GNA of one grantee is allowed by another GNA grantee only. The current process has following drawbacks: 1. Taking GNA is long process and may take 4-5 months. 2. GNA is for more than 11 months, while the GNA transfer may be required only for few months. In such cases, the transferee entity will have additional GNA which is not required which will block GNA capacity and result into losses to transferee entity. 3. GNA transfer application will have NOC from STU, hence availability of STU capacity is taken care off. 4. Transmission waiver is granted to RE generators hence GNA utilization shall be permitted in case of GNARE also

Annexure-I: - Suggestions /Comments on Staff Paper on CERC Connectivity and GNA Regulations

Sr. No.	Issue No of Staff Paper	Suggestion / Comment	Rationale
			Hence, the provision is required if a GNA grantee is willing to transfer its GNA to another user of grid which are not GNA grantee. This will ensure optimum utilisation of GNA (and hence Grid) capacity and will reduce the process time significantly.
3.	Issue No. 3: Dual Connectivity to the Bulk Consumer for the same load capacity	The bulk consumers should be allowed dual connectivity i.e. it should be allowed to have connectivity with STU as well as CTU for the same load requirement. Such grant of dual connectivity should be coupled with 1. NOC from the STU. Such NOC shall be not denied if there is capacity available in State Network. 2. The transmission charges applicable and payable by such entities having dual connectivity, should be based on schedule submitted for respective intra or inter or both networks. 3. For grant of such dual connectivity to bulk consumer, GNA and GNARE both options should be allowed, no restriction to be put on what type of power is drawn from STU	The bulk consumers source its power from multiple locations intra-state or Inter-state, under bilateral or Exchange or discoms, RE or NON-RE etc. In such case it is essential for a bulk consumer to have connectivity with STU and CTU both Proper metering arrangement can be devised on to ascertain quantum of power drawn through STU and ISTS Bulk consumer may maintain contract demand to meet its emergency power requirement.

Sr. No.	Issue No of Staff Paper	Suggestion / Comment	Rationale
		network if GNARE is allowed in ISTS network as user will pat STU charges. In all likely hood, user may use this provision mainly to draw grid power and hence any restriction on bring RE through ISTS will defeat the purpose of this provision.	
4.	Issue No. 4: Provision of Conn BG-2 for Bulk Consumer	1. 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 on submission of Conn BG2. 2. Post construction under ISTS, transmission charges for such ATS or dedicated elements like ICT, etc, should be considered under the transmission charges pool as is the case with Generator connectivity and shall not be bilaterally billed to bulk consumer. 3. Waiver provision shall be applicable as per Ministry of Power notification and CERC Regulation.	The proposal is in line with current provision applicable to Generator seeking ISTS connectivity and hence same provisions should be provided for Bulk consumers.
5.	Issue No. 5: Utilisation of the Connectivity granted to a subsidiary by another subsidiary of the same Parent company.	Utilisation of Connectivity among the different subsidiaries of the same Parent company should be allowed	The current provisions allow connectivity granted to a parent company to be utilised by its subsidiary companies or vice a versa. Such a provision will provide flexibility in structuring RE projects and there is no adverse

Sr. No.	Issue No of Staff Paper	Suggestion / Comment	Rationale
			impact on any stakeholder as the connectivity / GNA is already granted to a entity.
6.	Issue No. 6: Platform for providing NOC by the STU in a time-bound and a transparent manner	Centralized online platform is required to be implemented for processing the application for grant of NOC by the STU with access provided to CTU, all STUs, RLDCs and SLDCs. Also, such portal should monitor transmission capacity in the intra-State network and publish information to the stakeholders.	Intra-stare entities willing to avail and transfer GNA/ connectivity under GNA regulations and procedures need to provide STU NOCs as per the prescribed formats. A common platform is need of the hour where such entities can see the margin available in the intra-state network, apply and receive STU NOCs in a time bound and transparent manner. Also, many a time, lot of time is taken by STU to provide such NOC, such a portal maintained by CTU will help reducing such time period, provide transparency in the process and get approval in time bound manner.
7.	Issue No. 7: Provision for grant of Solar hours Connectivity and Non-Solar hours Connectivity through the same Transmission system	Provision should be introduced for specific "Solar-hour Connectivity" and "non-Solar hour Connectivity" and CTU shall made available system margin available under such specific hour connectivity periods. However no preferential treatment should be given to any existing connectivity grantee and the current system of priority should be followed while dealing with such application post amendment in the GNA Regulation.	Such provision will help in optimum utilisation of transmission network and will help greatly in advancing the RE transition plan as today the transmission availability is becoming bottleneck and getting ISTS connectivity has become most critical path. Existing RE developers have an advantage by virtue of existing infrastructure hence the first right of refusal before tendering the capacity. For us the transmission constraint is likely to persist for the next 3 years. To ensure that there is level playing field and to prevent inordinate hoarding of

Sr. No.	Issue No of Staff Paper	Suggestion / Comment	Rationale
			any GNA /marginal connectivity at generation end a uniform process should be followed.
8.	Issue No. 8: Provision for Minimum Transmission Capacity Utilisation for Hybrid ISTS Connectivity	Minimum annual capacity utilization of the Connectivity by the RHGS should be mandated. Also, under Solar Hour and Non Solar Hour connectivity, the available Cpacity from RHGS shall also be counted while granting additional connectivity for specific time blocks.	In order to ensure optimum utilisation of the transmission network, it is necessary that no hoarding of capacity happens.
9.	**New Proposal** **Amendment to Regulation 5.5**	Currently Renewable Power Park Developer is eligible to apply for a grant of Connectivity in phases where in the first phase the application for Connectivity shall not be less than 500 MW and 50 MW or more for second phase thereon. Renewable Power Park Developer shall be eligible to apply for a grant of Connectivity in phases with subject to a minimum quantum of 50 MW in each phase.	i) RE park developer should be eligible to apply for connectivity for part of the quantum for which it is been allocated by State /Central Government. ii) Provisions related to connectivity application for RE Park Developer does not cover RE RTC with Storage. In case of RE with Storage, the RE capacity would be more but the connectivity requirements will come down due to storage. Hence in such cases, the project developer cannot meet any requirement to apply for full quantum of authorised capacity. iii) RE Park Developer may set up RE plant for captive use and in such case part of capacity may be consumed by dedicated line and only part capacity may require CTU connectivity. Hence RE Developer will never require CTU connectivity for quantum equal to authorised capacity.

Sr. No.	Issue No of Staff Paper	Suggestion / Comment	Rationale
			iv) Most State policies lay down certain conditions such as completion of park development for full capacity within certain years. Hence, State policy provides sufficient flexibility and timeline to Park Developer, the CTU connectivity requirements should be aligned to such policy provisions.
10.	**New Proposal** **Amendment to Regulation 5.8 (xi) (b)**	The land documents issued to RE park developers shall also be valid land documents for the purpose of this regulation provided that the RE park developer and RE developer is same entity and such RE park developer is allowed to develop RE project under the government policy	In many States, except in Gujarat, land is allotted to RE Park Developer for development of RE park. Such policies allow that: i) The RE park developer can also be RE developer for part of full allocated capacity. ii) The RE park developer can develop RE project for captive consumption or self-use. The land will be allotted to an entity for RE Park development and same entity can also become RE Developer (self-consumption / third party/DISCOM sale etc.). In such cases, RE Developer should also be able to apply for CTU connectivity under relevant provisions pertaining to RE developer and the land documents, which are issued for the purpose of RE Park Development should also be considered as valid documents for the purpose of this Regulation.

Annexure-I: - Suggestions /Comments on Staff Paper on CERC Connectivity and GNA Regulations

Sr. No.	Issue No of Staff Paper	Suggestion / Comment	Rationale
11.	**New Proposal** **Amendment to Regulation 17.1**	Currently a Bulk consumer or a distribution licensee with a minimum load of such entity is 50 MW is eligible for connection to ISTS. The entity with load limit of less than 50 MW and which is Subsidiary / Parent / Affiliate of a bulk consumer which is existing GNA grantee, such entities should also be eligible to get GNA of less than 50 MW through the electrical system of the existing GNA Grantee. As set of consumers, with one of them being a lead consumer, and together meting minimum load requirement of 50 MW on aggregate basis should be allowed to seek GNA /ISTS connectivity at same ISTS substation.	Larger industries or its subsidiary / affiliate company may set up various units within a same premises. PLI and such other schemes of Government of India makes it mandatory to set up the units under new SPV to get benefits under such schemes. Such subsidiary/affiliate unit may not meet the 50 MW minimum load requirement and hence will not be able to meet eligibility requirement of GNA for connectivity to ISTS. Therefor all such entities together with aggregate load of minimum 50 MW should be eligible to seek GNA. Similar provision is already there for generating stations hence it should also be allowed for bulk consumers.
12.	**New Proposal** **Regulation 26 to 35**	1) Co located BESS and RE plants or Hydrogen plants collocated with RE plant or any consumer directly connected with RE /BESS plant through a captive line should be eligible to secure T-GNA (as a consumer) equivalent to the connectivity to export power taken. 2) Annual exercise to be undertaken by CTU to establish limits for seasonal/annual TGNA permissible. This can be used as guidance by developers to plan/source offtake accordingly	Consumer connected with captive dedicated line to RE plant will require to balance the power when RE is not available due to its intermittent nature. Such consumer should be allowed to balance their requirement, up to equivalent RE plant capacity, through user of T-GNA and there should not be any restriction in quantum of T-GNA linked with their GNA for such plants This mechanism would help in grid stability and as well as increase line capacity utilization of Transmission network and thereby reducing the ISTS burden

Annexure-I: - Suggestions /Comments on Staff Paper on CERC Connectivity and GNA Regulations