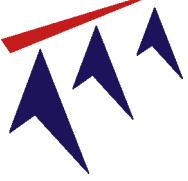


CONTINUUM



**CONTINUUM GREEN ENERGY PRIVATE LIMITED**  
(Formerly known as *Continuum Wind Energy (India) Private Limited*)

Date: 11.11.2024

To  
The Secretary,  
Central Electricity Regulatory Commission,  
7th floor, World Trade Centre, Nauroji Nagar  
New Delhi – 110029

Dear Sir/Madam,

Sub: Comments on the Staff Paper Stakeholder's suggestions for necessary modifications in the GNA Regulation.

We are thankful to the Hon'ble Central Electricity Regulatory Commission for providing an opportunity for us to share our Comments on the Staff Paper Stakeholder's suggestions for necessary modifications in the GNA Regulation. (Draft Notification NoL-1/261/2021/CERC Dated 09-10-2024). Please find our suggestion and feedback in the Annexure.

We request the Hon'ble Central Electricity Regulatory Commission to kindly consider our submission, as may be considered appropriate by the Commission.

Regards,

For Continuum Green Energy Private Limited



Authorised Signatory

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**CGEPL comments on per the Staff Paper on Stakeholder's suggestions for necessary modifications in the GNA Regulations issued by the Hon'ble CERC**

Sr.No	Existing Clause as per the Staff Paper on Stakeholder's suggestions for necessary modifications in the GNA Regulations issued by the Hon'ble CERC	Comments of CGEPL on the Staff Paper on Stakeholder's suggestions for necessary modifications in the GNA Regulations issued by the Hon'ble CERC
1	<p><b>Issue No. 1: Substitution of GNA quantum under Regulation 17.1(i) to Regulation 17.1(iii) to the GNA Regulations</b></p> <p>.....</p> <p>.....</p> <p>2.6 Considering the above, Comments and suggestions are sought from stakeholders on the following issues:</p> <p>i. Whether such substitution of GNA quantum under Regulation 17.1(i) to GNA/under Regulation 17.1(iii) should be allowed?</p> <p>ii. If such substitution is allowed, should it be coupled with the following conditions:</p> <p>a. the entity shall submit the NOC from the STU.</p> <p>b. the entity shall be liable for payment of the charges of the intra-State network or relinquishment charges, as applicable.</p> <p>c. the entity shall be radially connected with the ISTS as 17.1(iii) entity</p>	<p>In this regard we would like to submit that the substation may be allowed subject to the payment of relinquishment charges for the stranded capacity arising due to aforesaid substitution of GNA quantum from Regulation 17.1 (i) to Regulation 17.1 (iii) or transmission charges of the intra State network.</p> <p>As the language Regulation 17.1. (iii) clearly states that the distribution licensee or a Bulk consumer shall need to connect directly to ISTS network therefore the distribution licensee or a Bulk consumer shall need to develop their own network from their Distribution S/S or from their consumer premise to ISTS Sub Station therefore if DL or STU connected consumer allowed to substitute their GNA from Regulation 17.1 (i) to Regulation 17.1 (iii) then it will be contradictory to the Regulation 17.1 (iii). Therefore, the entity shall need to be radially connected with the ISTS like 17.1(iii) entity for the purpose of substitution.</p>
2	<p><b>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</b></p> <p>.....</p> <p>.....</p> <p>3.4 Considering the above, Comments and suggestions are sought from stakeholders on the following issues:</p> <p>i. Whether such utilisation of GNA of a GNA grantee can be allowed by an entity that is not a GNA grantee?</p> <p>ii. If such use is allowed, should it be coupled with the following conditions:</p>	<p>In this regard, we would like to submit that use of GNA of a Connectivity grantee by an entity connected with an intra-State network that is not a GNA grantee may not be allowed as if it is allowed then it might be resulted in to trading of GNA quantum.</p> <p>Further the following issues need to be noted in this regard,</p> <p>a) In case availability of space in the intra-State network then how the priorities can be decided by the STU amongst the request for use of GNA of GNA grantee made by non GNA grantee under this Regulation and OA application pending before the STU which has been applied OA consumers under respective Open Access Regulation of the State.</p>



	<p>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</p> <p>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.</p> <p>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.</p> <p>d. Such utilisation shall be restricted to GNA only and not GNARE.</p> <p>iii. Issue of Waiver of transmission charges: If entity 'B' draws power from RE resources, should the GNA grantee 'A' be allowed waiver in respect of such RE power drawl.</p>	<p>b) If the entity which is not GNA grantee is located in other state, but region is same then in that case what will be procedure particularly in view of the various agency involved in such transaction.</p> <p>c) What will be the additional conditionalities as mentioned under this Regulation in case entity is located different state however the region is same.</p> <p>Further without prejudice to the above, following need to be noted,</p> <p>a) we would like to submit that there is no basis to differentiate GNA and GNA RE for the purpose of this Regulation.</p> <p>b) In case that use of GNA of a Connectivity grantee by an entity connected with an intra-State network that is not a GNA grantee is allowed then the Hon'ble CERC need to prepare the procedure in this regard so that there will no be any gaming or trading of GNA.</p>
3	<p><b><i>Issue No. 3: Dual Connectivity to the Bulk Consumer for the same load capacity</i></b></p> <p><i>i. Whether such grant of GNA to Bulk Consumer through dual connectivity, i.e., for the same load capacity should be allowed or not?</i></p> <p><i>ii. If such a grant of GNA to Bulk Consumer through dual connectivity is allowed, can it be coupled with the following conditions:</i></p> <p><i>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?</i></p> <p><i>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.</i></p> <p><i>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</i></p>	<p>In this regard we would like to submit that dual connectivity to bulk consumer for the same capacity shall not be allowed as it will result in to blocking of double OA quantum for the same load capacity though the same would be on different Network.</p> <p>Further it will also against the principle of optimizing existing transmission infrastructure for which various measures are being introduced by this Hon'ble Commission and various agency like CTU/STU.</p> <p>Further it will not be beneficial for the Bulk Consumer as they need to pay applicable Transmission Charges (in Rs/MW) for Inter State Network and for Intra State Network for the same capacity.</p> <p>Further the banking of RE is also depending upon the various policies issued by the State and provided further it will not be useful for the bulk consumers who are located at non-RE rich State.</p>



	<i>into GNA with a waiver of the ISTS charges as applicable for GNA in terms of the Sharing Regulations, 2020.</i>	
4	<p><b>Issue No. 5: Utilization of the Connectivity granted to a subsidiary by another subsidiary of the same Parent company.</b></p> <p><i>Whether such utilization of Connectivity among the different subsidiaries of the same Parent company should be allowed or not?</i></p>	<p>In this regard we would like to submit that the utilization of Connectivity among the subsidiaries of the same Parent company can be allowed as this will not amount to trading of connectivity.</p> <p>Transfer amongst subsidiaries is aligned to the spirit of Regulation 15 of GNA regulations which principally allow connectivity transfer amongst affiliates. While affiliate is not defined in company law, the transfer amongst subsidiaries with common parent is suggested. This would help in better utilization of connectivity and align with market requirement. Hence it will ensure and help to implement the Regulation effectively.</p>
5	<p><b>Issue No. 6: Platform for providing NOC by the STU in a time-bound and a transparent manner</b></p> <p><i>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?</i></p>	<p>In this regard, we would like to submit that NOC by the STU shall need to be provided in a time-bound and a transparent manner for the said purpose, therefore in this regard, 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 which will ensure transparency. The access for the said platform shall need to be given to entity who are applying for GNA of TGNA and need NOC for the same.</p> <p>Further such portal shall also facilitate NOC from Discoms (or SLDC) as required under SERC regulations as the Bulk Consumer connected to grid at 11 KV or 220 KV requires consent from both STU and Discom NOC for getting open access under GNA. Hence, the portal should facilitate both this. Further the State Transmission utilities shall provide the consent within 15 days as per Green Energy Open Access Rules 2022 otherwise it shall be considered as deemed NoC or deemed consent as received from STU.</p> <p>The Ministry of Power vide its letter no 25-10/30/2024-PG dated 18.09.2024 has directed all states that the procedure to issue NOC by states to GNA applicants be incorporated with the state single window system and then be connected to National Single Window System. Hence, a centralized portal in this line would be welcome.</p>
6	<p>Issue No. 8: Provision for Minimum Transmission Capacity Utilisation for Hybrid ISTS Connectivity</p> <p>8.6 An applicant should take Connectivity for a quantum that it wishes to utilise. It is proposed that to ensure the optimal utilization of the transmission system, a minimum annual capacity</p>	<p>In this regard, we would like to submit that to put Minimum Transmission Capacity Utilization for Hybrid ISTS Connectivity is very stringent and the same shall not be considered.</p> <p>Further CUF of the RHGS is far better than Standalone Wind Generators or Solar Generators. Further they can always add the Wind or Solar component to their existing Generation capacity</p>



<p>utilization, i.e., 50%, for RHGS may be mandated, failing which the underutilized capacity of the Connectivity may be reduced, effective 1st October 2026.</p> <p>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). Connectivity on such vacated capacity may be granted to other entities. 8.7 Considering the above, Comments and suggestions are sought from stakeholders on the above proposal whether the minimum annual capacity utilization of the Connectivity by the RHGS should be mandated or not.</p>	<p>or opt to add storage capacity in the existing Generation Capacity therefore this provision shall not be considered so that option for RHGS will be available to provide above stated additional capacity from Wind or Solar or from ESS to RHGS.</p>
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