

From: aveek chatterjee <[aveek.chatterjee@rpsg.in](mailto:aveek.chatterjee@rpsg.in)>  
To: Harpreet Singh Pruthi <[secy@cercind.gov.in](mailto:secy@cercind.gov.in)>  
Cc: Shilpa Agarwal <[shilpa@cercind.gov.in](mailto:shilpa@cercind.gov.in)>  
Sent: Mon, 11 Nov 2024 16:19:02 +0530 (IST)  
Subject: DIL Comments on CERC Staff Paper on Amendment in GNA Regulations

Dear Sir,

We thank the Hon'ble Commission for bringing out the Staff Paper dated 09.10.2024 on modifications in the GNA Regulations and providing an opportunity to all stakeholders to provide comments on the same.

In view of the above, please find attached the comments on behalf of Dhariwal Infrastructure Limited (DIL) on the aforesaid Staff Paper for your kind perusal and consideration.

Regards,

Aveek Chatterjee

DGM (Corporate Regulatory Affairs & Power Sale)

## **DHARIWAL INFRASTRUCTURE LIMITED**

### Comments on CERC Staff Paper on requirement of modifications in the GNA Regulations

At the outset, Dhariwal Infrastructure Limited (“**DIL**”) would like to thank the Hon’ble Central Electricity Regulatory Commission (“**Hon’ble Commission**”) for bringing out the Staff Paper on ‘Stakeholder’s suggestions for necessary modifications in the GNA Regulations’ and providing the stakeholders an opportunity to provide comments/suggestions on the same. Accordingly, the comments and suggestions on behalf of DIL on the afore-said Staff Paper are provided in the following matrix for the kind perusal of the Hon’ble Commission.

PARAGRAPH NO.	ISSUE AND PROPOSED AMENDMENT	COMMENTS AND SUGGESTIONS
Para 7	<p><b><u>Issue No. 6: Platform for providing NOC by the STU in a time-bound and a transparent manner</u></b></p> <p><i>7.1 Serentica have raised concerns regarding the issuance of NoC from STU while they wish to seek GNA to ISTS. It has been submitted that they face challenges in getting the timely consent of the STU for the intra-State network. Stakeholders have suggested that the NoC / Deemed NOC should be provided for existing consumers in a time-bound manner. Some stakeholders have also suggested developing a centralised platform where an entity can apply for NOC from the STU, and the concerned STU will issue or reject the NOC with a valid reason in a time-bound and in a transparent manner.</i></p> <p>....</p> <p><i>7.6 Considering the above, Comments and suggestions are sought from stakeholders, whether such a centralized online platform is required to be implemented for processing the application for grant</i></p>	<p><b>Platform for providing NOC by the STU may be developed for processing all such cases for which the STU is liable to issue NOC for all types of stakeholders of the transmission system like the State DISCOMs, Bulk consumers, trading licensees and the generators connected to the Intra-State Transmission Network.</b></p> <p><b><u>Justification:</u></b></p> <ol style="list-style-type: none"> <li>The issue has been raised from the perspective of a bulk consumer who wishes to draw power from inter-state entity through intra-state transmission system. In such cases, the NOC is required from STU considering the margin available in its network for wheeling of such capacity as requisitioned by the bulk consumer. However, in our humble submission, the requirement of NOC from STU is required not only for this purpose by a drawee entity within the State but also for such other purposes like a generator seeking to surrender connectivity of full or partial capacity to the intra-state network and seeking connectivity of equivalent capacity to the ISTS. In case the Hon’ble Commission mulls for development of a common platform for processing and issuing the NOCs by the STU in a time bound and transparent manner, it is requested that such portal be developed not</li> </ol>

## **DHARIWAL INFRASTRUCTURE LIMITED**

### Comments on CERC Staff Paper on requirement of modifications in the GNA Regulations

PARAGRAPH NO.	ISSUE AND PROPOSED AMENDMENT	COMMENTS AND SUGGESTIONS
	<i>of NOC by the STU in terms of availability of transmission capacity in the intra-State network?</i>	<p>only for processing of NOCs by STU of only specific cases like application of for GNA covered under Regulation 17(ii), but all such cases for which the STU is liable to provide an NOC viz. the following:</p> <ul style="list-style-type: none"><li>• An intra-state generator seeking to surrender its connectivity and get equivalent connectivity to ISTS.</li><li>• Substitution of GNA by the DISCOMs</li><li>• Use of GNA granted to entities by other GNA grantees.</li></ul> <p>This will ensure a comprehensive one-stop window for the stakeholders for transfer, utilization and application for connectivity and access in between ISTS and STU network.</p> <p>2. We further request the Hon'ble Commission to set a timeline for processing of each and every type of NOC in case there is no specific reason for withholding or denying such applications.</p>