



FOURTH PARTNER ENERGY PRIVATE LIMITED

Reg. Office & Operations:

Fourth Partner House, Plot No. N46, H. No. 4-9-10,

HMT Nagar, Hyderabad, Telangana — 500076

Tel: +91-40-27158865, Fax No 040-48529389

E-Mail: info@fourthpartner.co

Website: www.fourthpartner.co

CIN No. U40 I 08TG201OPTC070806

Date: 09-11-2024

To

The secretary,

CERC,

Tower B, world trade centre,

Nauroji Nagar, New Delhi.

Respected Sir,

Sub: Comments on Staff Paper on modifications in the GNA Regulations

With reference to your public notice inviting comments on Staff Paper on modifications in the GNA Regulations, we hereby submit our comments in the attachment for your kind perusal and consideration.

For Fourth Partner Energy Pvt Ltd.

A handwritten signature in blue ink, appearing to read 'Rakesh Gopinath', is placed over a light blue rectangular background.

Rakesh Gopinath

Open Access team

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Delhi : Basement, J-1/37, DLF City Ph-II, (Near Sikanderpur Metro Station) Gurugram-(HR), 122 002.

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Suggestion for staff paper on necessary modifications in the GNA regulations.

1) Issue No.: 3 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?**

Suggestion: Allowing such utilization of GNA by non-GNA grantees could indeed help entities with multiple consuming units, especially if those units are spread across different locations, to more easily access renewable energy (RE) power. This could lead to greater flexibility and efficiency in managing power consumption across various sites.

ii) **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.**

Suggestion: Allowing the utilization of GNA by entities located within the same region, rather than restricting it to the same state, could indeed offer broader benefits. This approach would enhance flexibility and promote wider access to transmission infrastructure, especially for renewable energy (RE) projects, while also ensuring grid reliability.

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

Suggestion: This limitation may hinder the optimal use of renewable energy (RE) power by the drawee entity availing RE resources. Hence, it is suggested to include GNARE.

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

Suggestion: The provision allowing for the utilization of connectivity granted to the parent company by its subsidiaries, and vice versa, be extended to include scenarios where a subsidiary is granted connectivity by another subsidiary of the same parent company.

This extension would enhance the company's ability to effectively utilize the connectivity in the event of unforeseen changes in policies or regulations imposed by state authorities in the areas where projects are established.

3) **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?

Suggestion: A clear procedure and defined timeline for NOC processing should be established. An online platform can manage the process, ensuring transparency, real-time tracking, and timely approvals through automated alerts. This would streamline the NOC process, improve accountability, and reduce delays in GNA applications.

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

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suggestion: Existing solar generators without storage should be given the option to install storage and utilize their connectivity/GNA during non-solar hours. This option would allow them to enhance their operational flexibility and contribute to grid stability. However, the proposed timeline—submitting an application within three months and installing within 24 months—should be extended slightly to accommodate financial, technical, and regulatory hurdles that may arise.

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

Imposing a minimum annual capacity utilization requirement of 50% for hybrid generators (RHGS) is not advisable, as it undermines the significant financial investments made by these developers and jeopardizes their business models. Hybrid generators require substantial capital for infrastructure, technology, and maintenance, and imposing strict utilization thresholds could create undue pressure on their operational flexibility and profitability. Furthermore, the energy market is often subject to fluctuations in demand and generation conditions; therefore, mandating a minimum utilization rate could force these generators into unviable positions. Instead, it would be more beneficial to allow hybrid generators to retain the quantum of connectivity based on their average maximum injection, as this would support their operational viability while ensuring that the transmission system is utilized effectively without penalizing those who have made considerable investments in renewable energy infrastructure.

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