
	<p style="text-align: center;"><b>GUJARAT ENERGY TRANSMISSION CORPORATION LIMITED</b>  <b>STATE LOAD DESPATCH CENTRE</b>  (CIN): U40100GJ1999SGC036018  220 kV Gotri Sub Station Compound, Gotri Road, Gotri, Vadodara-  390021  Tel. No.: (0265) 2352103, 2322207 Website: <a href="http://www.sldcguj.com">www.sldcguj.com</a>,  Email: <a href="mailto:celd@gebmail.com">celd@gebmail.com</a>, <a href="mailto:seopslcd.getco@gebmail.com">seopslcd.getco@gebmail.com</a></p>	
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Ref. No.: SLDC/CE/MIS/GERC/GNA/4689

Dated: 23.11.2024

To,  
The Secretary,  
Central Electricity Regulation Commission,  
6th, 7th & 8th Floors, Tower B, World Trade Centre,  
Nauroji Nagar, New Delhi- 110029.

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

Respected Sir,

Hon'ble Central Electricity Regulation Commission has published the staff paper on Stakeholder's suggestions for necessary modifications in the GNA Regulation on 9th October 2024 and request for suggestions/comments from stakeholders and statutory bodies.

In this regards, SLDC Gujarat is submitting the comments and suggestion on the staff paper regarding modification in the GNA regulation. Also explaining the SLDC Gujarat had faced difficulties for applicability of the GNA regulations 2022 and amendment time to time.

The comments for the staff paper as under:

**SLDC Gujarat comments on issue No 1: Substitution of GNA quantum under Regulation 17.1(i) to Regulation 17.1(iii) to the GNA Regulations:**

- Should substitution be allowed? Yes, substitution should be permitted under appropriate conditions to ensure system reliability and efficient resource allocation.
- Suggested conditions for substitution:
  - NOC from STU: Mandatory, to confirm that the intra-State network can handle the additional load and to ensure proper permissions are in place.
  - Liability for charges: Yes, the entity must bear the applicable intra-State network or relinquishment charges to avoid imbalances in network costs.
  - Radial connection: Yes, entities operating under Regulation 17.1(iii) must maintain a radial connection with ISTS for clear operational boundaries.
  - Separate scheduling and energy accounting: Yes, to ensure seamless operations, a distinct methodology for scheduling and energy accounting is necessary with consultation of concern SLDC before approval.

**SLDC Gujarat comments on 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.**

- Should non-GNA grantees use GNA? Yes, but under specific conditions to avoid misuse and ensure network stability.
- Conditions for such utilization:
  - NOC from STU: Yes, this ensures that the intra-State network has sufficient capacity for the additional GNA and the specified time period.
  - Same State/Region: Yes, requests for GNA utilisation should be restricted to entities within the same State or region to maintain simplicity in network management.
  - Use only available ISTS margins: Yes, GNA utilisation should only be allowed if there is sufficient margin within the ISTS, without requiring augmentation.
  - Exclusion of GNARE: Yes, GNA should be kept separate from GNARE to avoid complications in categorization and operational clarity.
  - Separate scheduling credentials: Yes, NLDC/RLDC should issue distinct login credentials for these GNA grantees to maintain accurate scheduling and energy accounting.
  - Manual entry of requisitions on behalf of multiple drawee GNA entities creates errors, especially during peak periods when system operators at SLDC are managing real-time grid operations. By decentralizing data input, each entity can directly input their data, reducing the chances of manual errors, ensuring higher accuracy, and reducing rework.
  - Having direct access to the scheduling platform will allow Drawee GNA entities to quickly adapt to changes in real-time and ensure that schedules align with contractual obligations.

**SLDC Gujarat comments on issue No 3: Dual Connectivity to the Bulk Consumer for the same load capacity.**

- Should it be allowed? No, dual connectivity for the same load capacity could introduce complexities in scheduling and energy accounting, potentially leading to operational inefficiencies.
- SLDC Gujarat has face difficulties to schedule the power to intra State Distribution licensees for the granted GNA of 800 MW TPL Ahmedabad (TAECO). SLDC Gujarat had made various interaction (Video conference) to resolve the issues as above difficulties with RLDC, NLDC, CTU, M/s Torrent Power Ltd and STU-GETCO.
- SLDC Gujarat had organized the video conference meeting on 13<sup>th</sup> March 2024, regarding the issue raised due to granted GNA of 800 MW to Torrent power ltd –Ahmedabad.

**The matter is as under:**

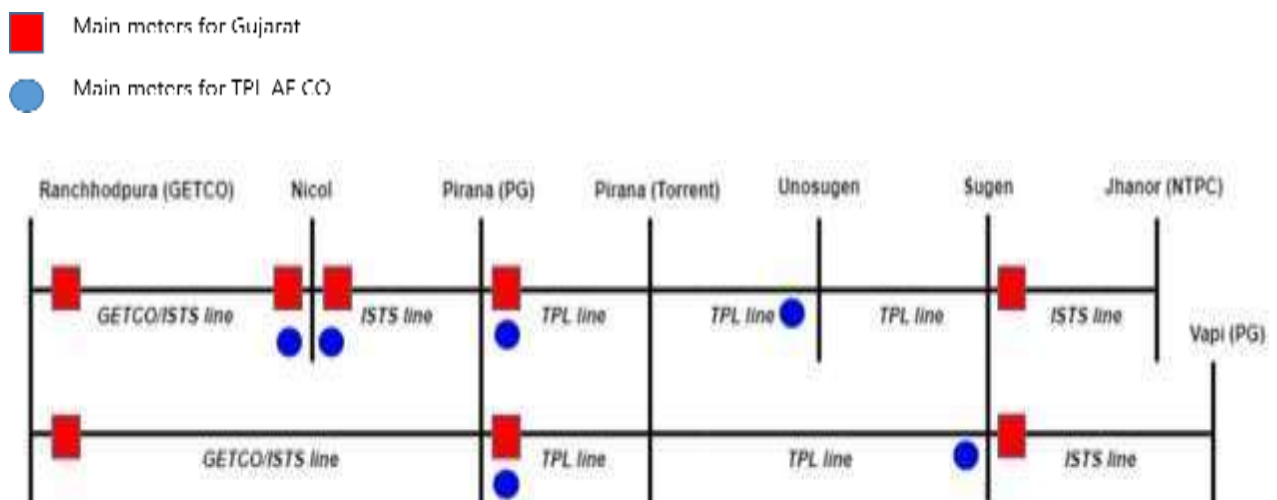
- **The power ties up, SUGEN and UNO-SUGEN plants are as under:**

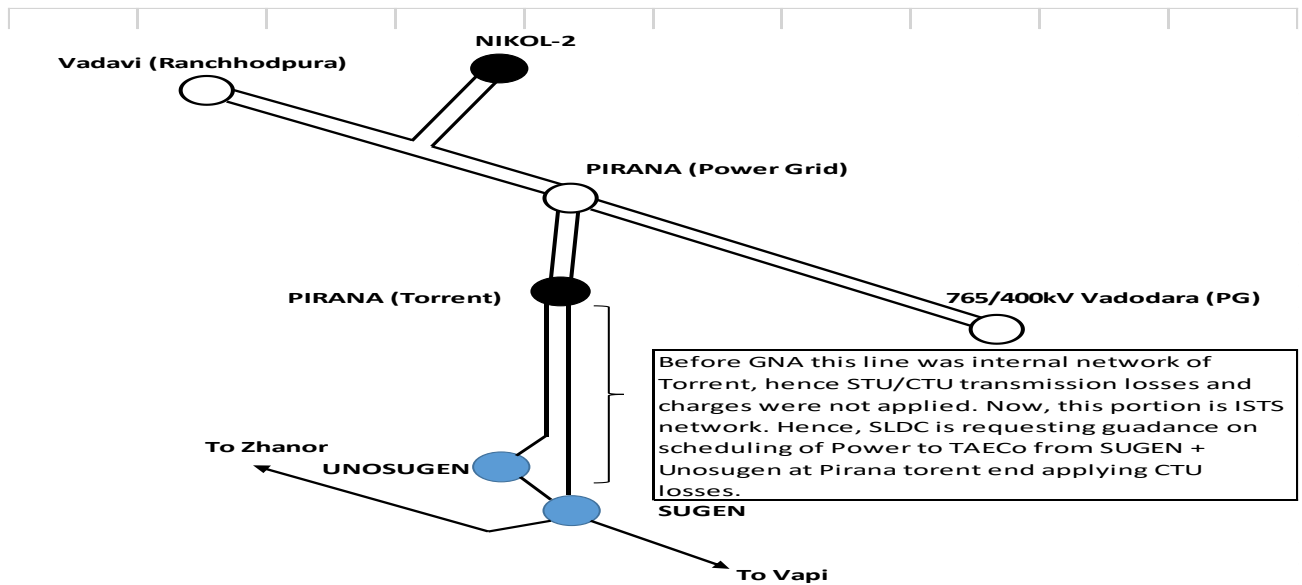
Particular	SUGEN	UNOSUGEN
<b>Total Capacity of Plant</b>	(3*382.5MW)= 1147.5 MW	382.5MW
<b>Share of TP AE CO.</b>	417.5 MW	139 MW
<b>Share of TP SE CO.</b>	417.5 MW	139 MW
<b>Share of MPPTC</b>	50 MW	
<b>Merchant Share</b>	262.50 MW	93.98 MW

- **The details of GNA approved (in MW) to various Intra State entities of Gujarat is as under:**

Intra State Entity	GNA bifurcation in MW	Addl. GNA in MW	Total in MW
TPL - Dahej	50		50
MPSEZ UL	31.89		31.89
TPL SE CO	44.64		44.64
GUVNL	10500		10500
TPL AE CO	44.64	800	844.64
IR Gujarat	141.30		141.30
HWB	14		14
Total	10826.47		11626.47

- **The 400 kV network connected to TPL AE CO, SUGEN and UNO SUGEN and metering point of Gujarat and TPL AE CO is shown below:**





- The details of main metering points of APL AE CO, TPL SE CO, SUGEN and UNO SUGEN are as under:

Torrent AEC drawl points	
Connected with ISTS	
+4-L-NIC-KMD-M1	400 kV Pirana(PG) Line-1 at Nicol(Torrent).
+4-L-NIC-VDV-M1	400 KV VADAVI line No.1 at NICOL (Torrent)
-4-L-KMD-PRN-M1	400 KV Pirana(TGL) line - 1 at Kamod(PGCIL)
-4-L-KMD-PRN-M2	400 KV Pirana(TGL) line - 2 at Kamod(PGCIL)
Dedicated network	
+4-L-SUZ-PRN-M2	400 KV Pirana(TGL) line - 2 at Sugen(TPL)
+4-L-UNO-PRN-M1	400 KV Pirana Line no.1 at Unosugen
Connected with GETCO	
+2-L-TAG-GTP-M1	220 KV TAECO GIS Line No.1 at GANDHINAGAR TPS
+2-L-TAG-GTP-M2	220 KV TAECO GIS Line No.2 at GANDHINAGAR TPS
+2-L-TAG-SOJ-M1	220 KV TAECO GIS Line No.1 at SOJA
+2-L-TAG-SOJ-M2	220 KV TAECO GIS Line No.2 at SOJA
-2-L-NIC-KNP-M1	220 KV Khanpur Line -1 at Nicol (AEC)
-2-L-NIC-KNP-M2	220 KV Khanpur Line -2 at Nicol (AEC)
+6-L-VAT-NRN-M1	66 KV Naranpura line-2 at Vatava
-6-L-AEC-RND-M1	66 KV Randheja line-1 at AECO.(Gandhinagar)

Sugen injection points	
Connected with ISTS	
+4-L-SUZ-GAN-M1	400 KV Gandhar(Zanor) Line -1 at Suzen(TPSEC)
+4-L-SUZ-VAI-M1	400 KV Vapi(PG) Line -1 at Suzen(TPSEC)
Dedicated network	
+4-L-SUZ-PRN-M2	400 KV Pirana(TGL) line - 2 at Sugen(TPL)
-4-L-UNO-SUZ-M1	400 KV Sugen Line no.1 at Unosugen
+2-L-SUZ-BTR-M1	220 KV Bhatar Line -1 at Suzen(TPSEC)
+2-L-SUZ-BTR-M2	220 KV Bhatar Line -2 at Suzen(TPSEC)
+2-L-SUZ-PUN-M1	220 KV Puna Line -1 at Suzen(TPSEC)
+2-L-SUZ-PUN-M2	220 KV Puna Line -2 at Suzen(TPSEC)
+2-L-SUZ-VED-M1	220 KV Ved(TPSEC) Line - 1 at TP Sugen
+2-L-SUZ-VED-M2	220 KV Ved(TPSEC) Line - 2 at TP Sugen
-2-L-GST-SUZ-M1	220 KV Sugen line-1 at Gensu(Solar)
-2-L-GST-SUZ-M2	220 KV Sugen line-2 at Gensu(Solar)
Connected with GETCO	
+2-L-SUZ-KIM-M1	220 KV Kim Line -1 at Suzen(TPSEC)
+2-L-SUZ-KIM-M2	220 KV Kim Line -2 at Suzen(TPSEC)

**Following are the point wise queries /discussion raised during the meeting:**

Sr.No	Issues raised	Gist of discussion
1	Status of GNA granted to TPL AE CO.	GSLDC informed that 44.64 MW deemed GNA is granted through STU and 800 MW additional GNA granted from CTU to TPL AE Co through direct connectivity with ISTS. The applicant was STU for 44.64 MW and TPL AE CO for 800 MW.
2	WRLDC sought clarification on considering additional GNA of 800MW to TPL AE Co to the total GNA of state of Gujarat.	<p>CTUIL clarified that the 800MW additional GNA should not be added to Gujarat state total GNA and this to be treated as separate GNA to TPL AE Co. as 800 MW is granted on ISTS directly.</p> <p>CE SLDC informed that TP AE CO has duel connectivity. Therefore, the deemed GNA of 44.64 MW through STU is for drawing power through State Network and cannot be clubbed with 800MW GNA</p>
3	WRLDC sought clarification regarding under which specific GNA clause additional GNA 800 MW has been granted to TPL Ahmadabad.	CTUIL clarified that 800 MW additional GNA is granted under clause No. 17.1 (iii) i.e. "A distribution license or a bulk consumer seeking to connect to ISTS, directly. With load of 50 MW and above
4	WRLDC enquired, whether GNA can be granted to existing Intra State DISCOMs under 17.1 (III) to connect to ISTS without surrendering the existing Access with STU.	CTUIL clarified that the additional GNA of 800 MW is granted under clause 17.1 (III) and for which no consent from STU is required.
5	<p>CE, SLDC informed that as per earlier connectivity regulation - 2009, State Distribution licensee shall remain connected with either State Transmission System or Inter State transmission system. There was no concept of dual connectivity for State Distribution licensee. Also, there is no clarity in current GNA regulations or no guideline for granting GNA to distribution licensee having duel connectivity. Hence, CTU should clarify the matter with Hon'ble CERC and until that current practices of scheduling and energy accounting to be continued.</p> <p>WRLDC also sought clarification on</p>	<p>CTU representative opined that there is no clarification in GNA regulation on the duel connectivity to distribution license. CTU informed that they would get clarification in this regard from Hon'ble CERC and will revert. CTU representative informed that the segregation of Distribution licensee is nowhere in regulations, but CERC allowed Distribution licensee seeking to connect to ISTS, directly under the clause of 17.1 (iii) of GNA regulations. It mean that No STU charges will be applicable to GNA granted under the clause of 17.1 (iii) of GNA regulations.</p> <p>CE (SLDC) informed that there was clear mandate that Intra State Distribution licensee or bulk consumer should have only one connectivity i.e. either through</p>

	whether an existing DISCOM can have dual connectivity and a GNA can be granted to an intra state DISCOM directly from ISTS?.	Intra State Transmission system or Interstate transmission system in earlier Hon'ble CERC regulation on grant of connectivity and open aces in Inter State Transmission system. Hence, CE (SLDC) opined that it is necessary to apprise Hon'ble commission, policy maker regarding issue and their guidance to be taken to find out solution to avoid litigations in future
6	WRLDC enquired on whether any other similar connectivity has been granted to any other DISOM in India.	CTUIL informed that no such cases exists
7	CTU sought clarification from TP AE CO regarding segregating connectivity for approved GNA of 44.64 MW as deemed under STU and additional GNA 800 MW directly from CTU.	<p>TP AECO representative informed that as per our understanding the total GNA granted is 844.64 MW is with direct GNA from ISTS.</p> <p>For this, CTUIL representative informed that as the deemed GNA 44.64 MW is drawing power through State network and 800 MW additional GNA drawing directly through ISTS, then the implementation aspect of 800MW GNA need further deliberation.</p> <p>WRLDC stated that since 44.64 MW GNA is through STU and the same has been agreed by CTUIL, more deliberation and clarification is required for the additional 800 MW GNA from CTUIL to overcome the difficulty in scheduling faced by WRLDC and SLDC . Similar cases may come in future and hence, the proper scheduling methodology is to be evolved.</p>
8	CTU representative asked whether any short term access were granted on ISTS to TPL AE CO.	<p>WRLDC informed that WRLDC cannot give STOA with ISTS directly to TPL AE CO as it is an intra state DISCOM.</p> <p>The short term access application is applied through STU and the State SLDC issues NOC for the quantum to be approved by WRLDC for ISTS STOA transaction. TPL AECO requested that the power from SUGEN to AE CO to be schedule under GNA and How to do this is a issue.</p>

9	<p>WRLDC sought clarification to CTU how can the 800MW GNA granted to TPL AE CO directly with ISTS can be tracked as the scheduling of TPL AE CO is done by SLDC and CTUIL had denied to add this GNA to State GNA.</p> <p>Since both the GNA (44.64 &amp; 800) are on different route which GNA contract is consumed by TPL Ahmedabad required to be scheduled separately because and for 44.64 MW GNA, the state transmission losses and charges need to apply. CGM (MO) opined that the POC losses and ISTS charges only would be applicable on additional 800 MW GNA.</p>	<p>CTU replied affirmatively for applying state transmission losses and charges on 44.64 MW GNA.</p> <p>CTU endorsed the view of WRLDC further informed that the amicable solution need to be find out for tracking of both GNA separately.</p> <p>CE (SLDC) informed that If we consider 800 MW additional GNA through ISTS, then SLDC has to split schedule of TP AE CO in two parts i.e. TPL AE CO Distribution licensee connected with STU and TPL AE CO Distribution licensee connected with CTU. The ISTS lines are not connected radially to TP AE CO so the power flow is as per the network topology. It would be very difficult to track the power flow according to contract. IF TP AE CO would identify 800 MW radial load to be connected to CTU, then it would be somewhat feasible, but in that case, one part will be controlled by RLDC and another by SLDC.</p> <p>WRLDC opined that control area splitting of a distribution licensee is not a worthwhile solution. Solution should not be a bifurcation of DISCOM. In addition, in case of contingency like all ICT tripping, ISTS line tripping and SUGEN / UNOSUGEN tripping, WRLDC have to revise schedule if one part of the area is with RLDC. At that time, TP AE CO could not get power through State network even though it is connected with State network. At present, we are unable to find a definite solution to implement scheduling of additional 800 MW GNA on ISTS network. It need to be deliberated further and all are requested to their views/solutions so that 800MW GNA can be commenced at the earliest.</p>
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10	<p>WRLDC informed that TPL has requested that TP AE CO schedule from SUGEN / UNO SUGEN is under GNA contract. At present, the scheduling of SUGEN and UNO SUGEN are being done by SLDC – Gujarat and the same is not available with WRLDC. Suppose WRLDC consider the injection schedule of SUGEN to Gujarat and subsequently drawl schedule from Gujarat to TP AE CO, then the ISTS transmission loss will accounted and GNA consideration will not be visible there because TPL AE CO is not under the control area of WRLDC.</p>	<p>SE (Comm), WRPC also of the opinion that two separate schedules may be considered from Gujarat, one injection and other withdrawal.</p>
11	<p>WRLDC enquired about RTDA calculation wrt the 800MW GNA directly given to TPL AE CO by CTUIL as CTUIL has already clarified that the same cannot be added to states total GNA.</p>	<p>SE (Comm), WRPC informed that RTDA is prepared for the control area wise so both GNA require to be added as per the clause No. 17.1 (ii) of GNA regulation. SE (Comm), WRPC informed that since the scheduling of TPL AE CO is being done by SLDC – Gujarat as an embedded entity of Gujarat. The 800 MW additional GNA of TP AE Co will be added in Gujarat GNA for RTDA account.</p> <p>For this WRLDC stated that CTU has already clarified that this 800MW GNA is granted under 17.1(iii) and not under 17.1(ii). Under 17.1(iii), this GNA cannot be added to state GNA and a separate RTDA may have to prepared for this there need to be separate segregation of actual drawl by TPL AE CO from ISTS and STU.</p> <p>SE (Comm), WRPC informed that CTU should give additional GNA to TPL AE CO under the clause No. 17.1 (i) &amp; 17.1(ii) of GNA regulation. He further stated that there are two viewpoints one from transmission charge related. One is scheduling related and other on RTA. The additional GNA granted should be treated as separate GNA for the calculation of Transmission charges, but for scheduling point of view, both GNA to be combined.</p>



		<p>CGM (MO) stated that if 800 MW GNA of AE CO is added in Gujarat GNA, then it is one scenario and if not added, then it is different scenario.</p> <p>SE (Com), WRPC viewed that if both GNA will not be combined, and then there will be separation of TPL AE CO in two different entities. How it will be possible for State DISCOM licensee?</p>
12	<p>CTU representative asked TPL AE CO that whether segregations of both TP AE CO GNA is feasible in terms of metering / scheduling purpose. If segregation is feasible, then there might be solution of issue.</p>	<p>TP AE Co representative informed that they would check and revert.</p> <p>SE (Comm), WRPC informed that the segregation mean one area of Distribution Company would under control of SLDC and another one under RLDC. The segregation of Distribution licensee is nowhere in regulations.</p> <p>CGM (MO) stated that WRLDC not accepting the proposal of segregation of DISCOM control area. As per IEGC – 2023, any change in control area should be with the approval of CERC.If SUGEN/UNOSUGEN control area with approval CERC change from SLDC to WRLDC, and then there might be solution of to this issue.</p>
13	<p>WRLDC informed SLDC – Gujarat to check the proposed metering arrangement given in the presentation is sufficient if Torrent system is to be separately considered and requested for the views of both SLDC and TPL AE CO.</p>	<p>TPL representative informed that earlier there was 400 kV Dehgam (PG) – Nicol line. Thereafter, 400 kV Ranchodpura (GETCO) – Nicol (T) line was been established to reduce fault level. Hence, it should not be treated that Nicol is connected with State network.</p>

- CE (SLDC) stated that no clarity is came out in discussion regarding how to monitor both TPL AE Co GNA i.e. 800 MW direct GNA and 44.64 MW STU GNA. If 800 MW GNA is not part of Gujarat schedule, then how SLDC will prepare deviation account and how this will affect the RTDA of State of Gujarat. It is further stated by SLDC that whatever scheduling methodology will derive that will be applicable in all such cases in future. Hence, the solutions should be find out very carefully.
- Again, SLDC Gujarat had organized the video conference meeting on 2<sup>nd</sup> May 2024, regarding the issue raised due to granted GNA of 800 MW to Torrent power ltd –Ahmedabad. Still it is not concluded.
- SLDC Gujarat, WRLDC is unable to do schedule of power of 800 MW from Sugen and Unosugen to TAECO without the separation of the identified 800 MW load.

## **Case No :-2 GNA grant of 160 MW to TSECo**

- As per meeting held on 11.06.2024, among CEA, CTU, GRID-INDIA, GETCO, GETCO SLDC, and TPL Surat addressed several critical points regarding TPL's proposal to connect their 160MW load at 220kV Bhatar S/s directly with ISTS at Navsari(New) S/s.
- SLDC Gujarat has also face difficulties to schedule the power for the granted GNA to TSECo of 160MW load at Bhatar would be exclusively connected to Navsari(New) (ISTS) S/s.
- Regulation 43(4) of the IEGC Regulations, 2023: The entities connected exclusively to the inter-State transmission system shall be under the control area jurisdiction of RLDCs for scheduling and despatch of electricity for such entities. Control area for Bhatar-TSECo 160 MW will be shifted to WRLDC.
- There shall be two control area of one DISCOM one with SLDC and another with RLDC. Whether it should be permissible?
- Still it is pending due to reach a consensus on scheduling, emergency power drawl, and the requirement of STU NOC and how this will affect the RTDA of State of Gujarat.
- As per discussion, dual connectivity for the same load capacity could introduce complexities in scheduling and energy accounting (DSM, RTA, RTDA, Reactive bills) i.e. modalities of metering & applicability of STU charges and losses, potentially leading to operational inefficiencies.

### **Conditions if allowed:**

- NOC from STU: Yes, along with a commitment from bulk consumers to pay charges for both intra-State and ISTS networks, depending on their connectivity status.
- Conversion of GNARE to GNA: For bulk consumers drawing RE power, GNARE should convert to GNA if non-RE power is drawn, with a waiver of ISTS charges in line with the 2020 Sharing Regulations.
- Scheduling and energy accounting for dual connectivity: Accurate and authorized methods must be established before approving dual connectivity, to ensure smooth day-to-day operations with consultation of concern SLDC.
  - Define the Control Area jurisdiction (RLDC / SLDC).
  - If the control area jurisdiction with SLDC than Modalities for Scheduling and energy accounting (DSM, RTA, RTDA, Reactive bills) i.e. modalities of metering & applicability of STU charges and losses. Relevant provisions / regulations of the Hon'ble CERC and Hon'ble SERC shall be applicable and implement accordingly.
  - If control area jurisdiction with RLDC than relevant provisions of the DSM regulations, PoC Regulations and IEGC notified by Hon'ble CERC shall be applicable and Torrent Power Ltd should be physically disconnecting from STU network. Accordingly, Modalities for Scheduling and energy accounting (DSM, RTA, RTDA, Reactive bills) shall be define by RLDC in-consultation with SLDC.
  - Procedure or guideline specifying for Dual connectivity of ISTS and STU, i.e. TAEC0 and TSECo,
  - To prevent any ambiguity or unintended financial implications to applicant as well as other state beneficiaries or DICs.

### **Case – 3: SLDC Gujarat comments on issue Treatment for Deemed GNA allocation to MUPL**

SLDC Gujarat would like to bring to your attention an issue arising from the deemed GNA allocations as per the CERC Connectivity and GNA Regulations, 2022, and its implications on intra-state entities in Gujarat as under:

#### **Background:**

- **Deemed GNA Allocation:** As per the CERC Connectivity and GNA Regulations, 2022, the SLDC of Gujarat has segregated the deemed GNA as per the regulation 18.1(e) among various intra-state entities based on existing Long-Term Open Access (LTOA) and Medium-Term Open Access (MTOA) agreements prevails.
- **STU Communication:** The State Transmission Utility (STU) has subsequently communicated the deemed GNA and additional GNA allocations to these entities in accordance with their LTOA/MTOA standings.

#### **Issue:**

- **MUL's Stance:** MUL has explicitly informed the STU of its non-requirement for GNA through the STU, opting not to accept the deemed GNA. Despite this, the deemed GNA was allocated to MUL, and WRLDC has since been raising Fees and Charges bills to MUL based on this allocation.
- **Billing Dispute:** MUL has refused to pay the WRLDC Fees and Charges, arguing that it did not accept the deemed GNA allocation and has no requirement for GNA through the STU.
- **STU's Request to CTU:** STU communicated with the CTU, requesting reconsideration of the GNA capacity allocated to MUL and GUVNL, but there has been no reconsideration from the CTU.
- **Request from WRLDC:** With the billing dispute unresolved, WRLDC has now requested the SLDC to intervene and resolve the issue.

#### **Request for Clarification and Resolution:**

1. **Reconsideration of Deemed GNA Allocations:** It is essential to address the concerns of entities like MUL, which have explicitly communicated their non-requirement of GNA through the STU. The allocation of deemed GNA without consideration of such representations has led to unnecessary financial disputes.
2. **Clear Guidelines on Billing and Fees:** Clear guidelines should be established on how RLDC should proceed with billing when an entity has denied the deemed GNA allocation. This would prevent any disputes and ensure that only the entities that have accepted GNA allocations are billed accordingly.
3. **Resolution Mechanism:** A formal resolution mechanism should be outlined within the GNA regulations for addressing such disputes between intra-state entities, STU, CTU, and RLDC. This will help in resolving issues swiftly and avoiding prolonged financial disagreements.

In accordance with regulations, 41 and 42 of the GNA regulation 2022 notified by Hon'ble CERC, empowered to remove difficulties and may provide relax to the GNA implementation issues. The regulations 41 and 42 is reproduced as under;

**"41. Power to Relax**

*The Central Commission, for reasons to be recorded in writing, may relax any of the provisions of these regulations on its own motion or on an application made before it by an affected party to remove the hardship arising out of the operation of these regulations".*

**"42. Power to Remove Difficulty**

*If any difficulty arises in giving effect to the provisions of these regulations, the Central Commission may, on its own motion or on an application made before it by affected party by order, make such provision not inconsistent with the provisions of the Act or provisions of other regulations specified by the Central Commission, as may appear to be necessary for removing the difficulty in giving effect to the objectives of these regulations".*

Since, the GNA regulation is made effective with its all aspects from 01.10.2023 and the subsequent implementations of the various regulations i.e. Regulation 17, Regulation 18.1(e), Regulation 37.6 under GNA regulations 2022 are needs to explain before Hon'ble CERC for the State concerns and smooth implementations of the GNA regulations 2022 and subsequent amendments.

Hon'ble Central Electricity Regulatory Commission is requested to consider the comments and the concerns / case study explain above submitted by SLDC Gujarat.

With regards,  
Thanking you,

**For State Load Despatch Centre**

Sd/-  
(Kanti Bhuvra)  
Chief Engineer  
Gujarat.