



MP POWER MANAGEMENT COMPANY LIMITED

C.I.N.: U40109MP2006SGC018637 (MP GOVT. UNDERTAKING)

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No. CGM (Regulatory)/ **348**

Jabalpur, Dated: **11/11/2024**


To,

The Secretary,
Central Electricity Regulatory Commission,
7th Floor, Tower B, World Trade Center,
Nauroji Nagar
NEW DELHI - 110029.

Sub: Staff Paper on modifications in the GNA Regulations.

In reference to above, MP Power Management Company Limited (MPPMCL) has made its suggestions/objections/comments, which are enclosed herewith for kind submission/consideration of before Hon'ble Commission.

Encl: As above


Addl. CGM (Regulatory)
MPPMCL, Jabalpur.

Staff Paper on Stakeholder's suggestions for necessary modifications in the GNA Regulations

S No	Issue	Comments Sought by CERC	Comments by MMPMCL
1	Issue No. 1: Substitution of GNA quantum under Regulation 17.1(i) to Regulation 17.1(iii) to the GNA Regulations	<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>Allow Substitution with Clarifications: The substitution of GNA from Regulation 17.1(i) to Regulation 17.1(iii) should be permitted, provided the quantum of GNA remains unchanged. This would allow entities to optimize their access to ISTS without reducing the GNA quantum.</p> <p>Clarify Relinquishment Charges: The Commission is requested to clarify that no relinquishment charges should apply in cases where the GNA quantum remains unchanged but the entity switches from using the intra-State network to directly connecting with ISTS. Any charges related to the non-use of the intra-State network should be governed by the respective SERC regulations and not tied directly to the GNA quantum.</p> <p>Ensure Proper Coordination: Conditions like obtaining an NOC from the STU and ensuring radial connectivity with ISTS are prudent measures that should be incorporated to avoid conflicts and ensure the smooth transition of GNA.</p> <p>In conclusion, the substitution of GNA from Regulation 17.1(i) to Regulation 17.1(iii) should be allowed with appropriate regulatory guidance on relinquishment charges and clear conditions on coordination and eligibility, to ensure transparency and prevent misuse of the substitution provisions.</p>

2	Issue No. 6: Platform for providing NOC by the STU in a time-bound and a transparent manner	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 of NOC by the STU in terms of availability of transmission capacity in the intra-State network?	Platform for providing NOC by the STU in a time-bound and a transparent manner may be provided for availing the GNA
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Addl. C G M (Regulatory)
M.P.Power Management Co. Ltd. JBP.