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Subject: MSEDCL Comments on Staff Paper on modifications in the GNA Regulations

Dear Sir,

Please find herewith MSEDCL Comments on Staff Paper on modifications in the GNA Regulations.

Thanks and Regards

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Comments for Amendment in GNA Regulations-Staff Paper

Issue No.	Details of issue	Points for comments/suggestion	MSEDCL's comments
1	Substitution of GNA quantum under Regulation 17.1(i) to Regulation 17.1(iii) of the GNA Regulations	Whether such substitution of GNA quantum under Regulation 17.1(i) to GNA/under Regulation 17.1(iii) should be allowed	No,additional GNA may be granted,if system permits.
		a.the entity shall submit the NOC from the STU.	
		b. the entity shall be liable for payment of the charges of the intra-State network or relinquishment charges, as applicable.	
		c. the entity shall be radially connected with the ISTS as 17.1(iii) entity	
2	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?	Yes.May be allowed for entity within the State.
		ii.If such use is allowed, should it be coupled with the following conditions:	
		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	STU may take the call after prudent check of the details of the non grantee
		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.	The non grantee should have connectivity of adequate capacity in InSTS,before using ISTS system.
		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.	Yes.
		d.Such utilisation shall be restricted to GNA only and not GNARE.	Yes,it should be restricted to GNA only.
		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.	Yes.Waiver will be claimed by grantee-A only.
3	Dual Connectivity to the Bulk Consumer for the same load capacity	Whether such grant of GNA to Bulk Consumer through dual connectivity, i.e., for the same load capacity should be allowed or not?	No,Dual connectivity should not be allowed.
		If such a grant of GNA to Bulk Consumer through dual connectivity is allowed, can it be coupled with the following conditions:	
		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?	NOC of STU and the concerned DISCOM should be taken.
		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	Yes.
		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 into GNA with a waiver of the ISTS charges as applicable for GNA in terms of the Sharing Regulations, 2020.	Yes,separate account of GNA & GNA-RE has to be maintained by STU.

4	Provision of Conn BG-2 for Bulk Consumer	i. Whether the implementation of the system for providing connection to the ISTS for the grant of such GNA to the entity covered under Regulation 17.1(iii) should be implemented as ISTS under TBCB/RTM, for which the concerned entity shall submit Conn-BG2?	Yes. Commitment of bulk consumer should be obtained through BG before carrying out any infra development.
		ii. Whether post construction under ISTS, transmission charges for such ATS or dedicated elements like ICT, etc, should be bilaterally billed to such Bulk Consumer or should be considered under the transmission charges pool?	Bilateral billing is applicable, when dedicated lines are constructed for the consumer. Transmission pool should not be burdened for the facility used exclusively by particular consumer.
		iii. Should charges of such system for providing connection to the ISTS, to be constructed under ISTS, be paid by the entities under GNA/GNARE where more than 50% of the transmission charges are waived off ?	Yes.
5	Utilisation of the Connectivity granted to a subsidiary by another subsidiary of the same Parent company.	Whether such utilisation of Connectivity among the different subsidiaries of the same Parent company should be allowed or not?	No. Already, connectivity granted to parent company is allowed to be used by subsidiary company. So, not much requirement for this permission.
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?	This is a good move. Already many of the procedures are online. This would help speed up implementation of projects.
7	Provision for grant of Solar hours Connectivity and Non-Solar hours Connectivity through the same Transmission system	Should existing solar generators (without storage) also be given the option to install storage for utilisation of connectivity/GNA during non-solar hours by submitting an application to CTUIL within three months and installing within a period of 24 months, failing which connectivity/GNA during non-solar hours shall be utilised to grant another connectivity through the same transmission system as 'non-solar hour connectivity' to another applicant, based on the other RE resources or Storage plant, for injection of power during non-solar hours?	Yes.
8	Provision for Minimum Transmission Capacity Utilisation for Hybrid ISTS Connectivity	whether the minimum annual capacity utilization of the Connectivity by the RHGS should be mandated or not.	Yes. To avoid under-utilization of resources, it is necessary to keep minimum capacity utilization. Also, there should be a penalty imposed on the generator for not providing the minimum power as mandated.