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Ref: MPL/1526/2024

Dated- 02 December, 2024

To,
The Secretary,
Central Electricity Regulatory Commission,
7th Floor, Tower B, World Trade Centre,
Nauroji Nagar, New Delhi110029

Sub- Comments/Suggestion(s) on the CERC Staff Paper on necessary modifications in the GNA Regulations

Respected Sir,

We, Manikaran Power Limited ("MPL"), are a Category 1 trading licensee under Central Electricity Regulatory Commission (Procedure, Terms and Conditions for grant of trading licensee and other related matters) Regulations, 2020.

This is in reference to Suggestions/Comments/feedback on the CERC Staff Paper on necessary modifications in the GNA Regulations.

In view of the same, we hereby submit our comments and suggestions on the proposed draft regulation(s).

We humbly request you to consider our comments and suggestions while finalizing the said amendments.

Thanking you,

For and behalf of Manikaran Power Limited,

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Rudrangshu Chakrabarti
Authorized Signatory

MPL's comments and suggestions on the CERC Staff Papers on GNA modification(s).

Proposals	Proposed Modification(s)	MPL's Comment/ Suggestion
2.	**Substitution of GNA quantum under Regulation 17.1(i) to Regulation 17.1(iii) to the GNA Regulations.**	**Comments:** Substitution of GNA quantum can be allowed for bulk consumers covered under regulation 17.1 (iii) who wishes to connect to ISTS directly. In that case, the GNA quantum allocated to STU should be reduced to the quantum substituted and be allocated to the eligible entities under regulation 17.1 (iii) but such substitution should be allowed on the following conditions: i. The eligible entity must file an application to STU at least one year in advance for surrendering the GNA quantum allocated to him. ii. The entity must continue to pay the transmission charges for the use of intra state transmission network only till the date of surrender. iii. NOC to be granted from STU at least three months prior to the date of surrender so that the eligible entity can submit to CTUIL during the application for substitution. iv. Further relinquishment of such GNA quantum substituted can be dealt as per Regulation 25 of CERC General Network Access regulation 2022 as amended from time to time.
3	**Use of GNA of a Connectivity grantee by an entity connected with an intra-State network that is not a GNA grantee**	**Comments:** Yes it will be welcome move to allow use of GNA of a Connectivity grantee connected to either intra-state network or ISTS by a non-GNA grantee fulfilling the eligibility conditions specified in CERC General Network Access regulations 2022 as amended from time to time subject to the conditions below: i. Non –GNA grantee either located in same state or same or different region should be allowed to use a part or full GNA of the original GNA grantee provided that the non-GNA grantee

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			already must have the connectivity approval from STU or CTUIL as the case may be. The rationale behind allowing intra state entity being in other region to use the GNA since peak power availability varies across regions during different seasons of the year, so limited use of GNA by the entities only in the same state or same region, during low demand season,will limit the use of spare availability of ISTS for use of entities in other regions with high demand season. It will also help in optimal of use of ISTS. ii. Original Connectivity grantee must file application in advance to STU or CTUIL as the case may be for transfer of such GNA quantum and period as per Regulation 23 of CERC General Network Access regulations 2022 for which NOC needs to be obtained from STU in case of intra state entity. iii. Liability of payment of transmission charges against the GNA shall be on the transferred GNA grantee from the date of surrender. iv. Such utilization should not be restricted to GNA only but GNARE also should be allowed which will aid the drawee entities to source RE power either to fulfill their RPO goal or achieve carbon neutrality. The rationale behind this is since RE generation varies across seasons & time of the year in different regions across geographical locations in the country sue to season changes in wind direction, solar irradiance, etc., providing such utilization to entities in other regions also will help them achieve such RPO goals thus optimizing the use of transmission system.

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	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. .	**Comments:** Waiver of transmission charges should be allowed to both entity 'A' and 'B' if they both continue to be GNA/GNARE grantee & draw power from RE sources.
4.	**Dual Connectivity to the Bulk Consumer for the same load Capacity**	**Comments:** There is not commercial benefit for the bulk consumer to get connected to both intra and inter for the same load capacity if they pay the transmission charges for use of intra state and interstate network for the same load capacity. Bulk consumer can be given connectivity to ISTS for the load exceeding the load connected to intra state network.
6.	**Utilization of the Connectivity granted to a subsidiary by another subsidiary of the same Parent company**	**Comments:** Yes utilization of Connectivity can be granted for use by different subsidiaries of the same parent company provided that the subsidiaries as a group or individually will allowed to use such connectivity up to the connectivity quantum granted to the parent company.
7.	**Platform for providing NOC by the STU in a time-bound and a transparent manner:**	**Comments:** Yes it will be a welcome move to create a centralized portal for obtaining NOC from STU in line with NOAR portal. This will help the applicants and concerned approval authorities to track, monitor and also ease the approval process. Requesting the Commission also to define the time frame for submission & approval of such application
8.	**Provision for grant of solar hours Connectivity and Non-Solar hours Connectivity through the same Transmission system**	**Comments:** Though it is a welcome step from the Honorable Commission to introduce solar and non-solar connectivity in order to optimize the use of ISTS especially during non-solar hours, we seek the following clarity: a. Will the solar hours as decided by Grid India will be same across regions? b. As proposed that for solar hours, the new Connectivity grantee may be allowed to schedule power if the transmission system is available after scheduling power of existing solar REGS. Suppose a solar REGS has been granted solar connectivity

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		of 300 MW from 06:30 to 19:00 hrs, so now if a Wind REGS or REGS with ESS (new applicant) wants to avail connectivity on the same transmission system, will the additional connectivity be granted to them? Will there be augmentation for the same? How would the new applicant assess the availability of transmission capacity? The Grid India should publish updated data as and when basis for substation wise connectivity quantum granted to solar REGS with date & period and remaining ATC available for non-solar connectivity on that transmission system. c. How would this move encourage other REGS to take connectivity during non-solar hours? d. Commission has proposed to allow existing solar generators (without storage) to install storage for utilization of connectivity/GNA during non-solar hours by submitting an application to CTUIL within three months and installing within a period of 24 months. Is this three months and 24 months provision effective from the date of COD? **Suggestions:** 1. Solar hours should be defined based on regions and should not be uniform throughout the country. 2. We humbly suggest to introduce 'Hybrid Connectivity' with segregation of solar and non-solar hours. Suppose an RHGS of 1000 MW with the Installed capacity of 700 MW Solar, 300 MW Wind can be given hybrid connectivity of 1000 MW during solar hours and 300 MW during non-solar hours. 3. We also suggest to introduce 'Hybrid Storage' Connectivity if the hybrid technology is coupled with ESS. Suppose an RHGS of 1000 MW with the installed capacity of 1100 MW of 700 MW Solar, 300 MW Wind, and 100 MW storage can be given 'Hybrid –Storage' connectivity of 1100 MW

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		during solar hours and 400 MW during non-solar hours. 4. Also, we humbly suggest honorable commission to introduce Peak Hours GNA / Connectivity to ensure commercial feasibility and Optimum usage of ISTS for energy Storage system , as it mostly discharge for some specific hours.
8	**Provision for Minimum Transmission Capacity Utilization for Hybrid ISTS Connectivity**	**Comments& Suggestion:** Maintaining the minimum annual capacity utilization factor (CUF) for RHGS at 50% for the life span of the project may pose significant challenges for the O&M and asset managers. Rather the Commission may continue to allow the minimum CUF of 30% for RHGS when measured at the inter-connection point, where the energy is injected into the grid as defined under Regulation 68 (1) of CERC (Terms and Conditions for Tariff determination from Renewable Energy Sources) Regulations, 2024. The Commission may also propose different CUF% based on regions.

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