



A Maharatna Company

एन टी पी सी लिमिटेड

(भारत सरकार का उद्यम)

NTPC Limited

(A Govt. of India Enterprise)

केन्द्रीय कार्यालय / Corporate Centre

Date: 11.11.2024

The Secretary
Central Electricity Regulatory Commission,
7th floor, Tower-B, World Trade Centre
Nauroji Nagar, New Delhi-110029

Subject: NTPC Submissions on "Staff Paper on modifications in the GNA Regulations".

Sir,

Hon'ble Commission has published "Staff Paper on modifications in the GNA Regulations" and has invited comments from the stakeholders on the staff paper.

In this regard, please find enclosed NTPC submissions on "Staff Paper on modifications in the GNA Regulations".

Thanking you,

Yours sincerely

Ajay Dua
ED (Commercial)

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

Hon'ble Commission has notified GNA Regulations, 2022 on 07.06.2022, and subsequently, the first amendment and second amendment were notified on 1st April 2023 and on 19th June 2024, respectively. A Staff paper has been issued based on suggestions from stakeholders and alternate proposals have also been made in the staff paper so as to receive appropriate feedback from the Stakeholders. The issue wise submissions are as follows:

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

Subject: -

Whether the minimum annual capacity utilization of the Connectivity by the RHGS should be mandated or not?

Submission:

i. The staff paper proposes that a RHGS applicant should take Connectivity for a quantum that it wishes to utilize. It is further proposed that to ensure the optimal utilization of the transmission system, a minimum annual capacity utilization, i.e., 50%, for RHGS may be mandated, failing which the underutilized capacity of the Connectivity may be reduced, effective 1st October 2026.

ii. In regards with minimum annual capacity utilization, i.e., 50%, for RHGS it may please be noted that as per MNRE Hybrid policy, capacity of one type of source should not be less than 33% capacity of other source and

RHGS consisting of wind having generally a CUF of 35% and solar projects having a CUF of 27% are developed as part of MNRE Hybrid Policy. With this combination it shall be difficult to have 50% Annual CUF.

In case excess capacities are installed and connectivity corresponding to annual 50% CUF is allowed there shall be significant excess power which shall require additional connectivity for evacuation of power. Hence a separate methodology is required for handling excess power beyond connectivity quantum if 50% annual CUF is mandated.

iii. Instead of above and considering the fact that the wind and solar generation may vary on year-to-year basis, depending upon the availability of resources, the connectivity quantum corresponding to the maximum injection in a time block in a year may be allowed to be retained instead of average of maximum injection in any time block of a day over the year (first year after the declaration of COD) as proposed alternatively.

iv. The balance quantum of the Connectivity may be revoked however the corresponding Conn-BGs may be returned. The Connectivity corresponding to such vacated capacity may be granted to other entities.

- v. It is also submitted that before revocation of shortfall of connectivity in above case, existing connectivity grantee may also be given an option of installing the wind /solar capacity to make up the connectivity quantum if the shortfall is within 5%.
- vi. It is also submitted that the above philosophy of **Minimum Transmission Capacity Utilisation** may be also extended for solar plus BESS, wind plus BESS generators to optimize the transmission system and connectivity quantum may be adjusted based on maximum injection in any time block of a day over the year (first year after the declaration of COD).

Issue No. 4: Provision of Conn BG-2 for Bulk Consumer

Submission:

- i. Considering the fact, many Green Hydrogen clusters are being planned where the power is to be catered to multiple GNA grantee from same ISTS substation, the implementation of the system for providing connection to the ISTS to an entity covered under Regulation 17.1(iii) needs to be implemented as ISTS either under TCB or RTM. Accordingly, the concerned entity shall also submit the requisite Conn-BG2.
- ii. Post construction of the system under ISTS, the Annual fixed charges of such ATS or dedicated elements like ICT, etc, should become the part of PoC transmission charges pool and charges of such system shall be paid by the drawee entities as per Sharing of Transmission charges Regulations provision.

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

Subject:- 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?.

Submission:

- i. Yes, the existing solar generators should be given first priority for development and installing of Storage at existing solar plant for seamless grid integration.
- ii. However existing Solar developers may be provided at least 12 months for applying connectivity for non-solar hour connectivity instead of 3 months. The same is required considering the fact that existing generating stations are required to evaluate various

options for the installation of storage facility which includes the battery supply tie ups and power sale arrangements by participation in BESS or solar plus storage tenders.

- iii.** It may be noted that many developers may have planned/envisaged co-located Storage at Solar project location as part of FDRE/RTC project to fulfil the CUF requirements which shall not reflect in the present project configuration or connectivity since as per present provision there is no separate requirement of connectivity for BESS for injection during non-solar hours. The above storage capacity needs to be taken care while distinguishing solar and non-solar connectivity for other developers.
- iv.** It may please be noted in case during non-solar hours the connectivity is granted to other developers with storage, such developer may require connectivity for discharging its excess energy after full charge of storage facility during solar hours. The requirement of providing such connectivity may also be taken care suitably through Regulation.
- v.** It is also requested that after the end of such process, CTUIL may publish list of available non-solar hour connectivity margin in such ISTS substations.

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