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ODISHA POWER TRANSMISSION CORPORATION LIMITED

(A Government of Odisha Undertaking)

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No. - RT&C/55/ 2022-

366 (2)

Dated 11.11.2024

To

→ The Secretary, CERC,
7th Floor, Tower B, World Trade Centre
Nauroji Nagar, New Delhi-110029

Sub: Comments and suggestions of OPTCL on staff paper for modifications in the GNA Regulations 2022.

Ref: Public Notice No. L-1/261/2021/CERC Dated: 9 th October 2024

Sir,

In response to your public notice vide letter under reference for modifications in the GNA Regulations 2022, OPTCL likes to submit its views on the staff paper.

The same is annexed herewith for your kind consideration.

Yours faithfully,


11/11/24

Sr. General Manager, (RT&C)

Cc

The PA to Director, (Operation), OPTCL for kind information of Director (Operation)

Views/Comments of OPTCL on staff paper for amendment of (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2022.

Issue No. 1: Substitution of GNA quantum under Regulation 17.1(i) to Regulation 17.1(iii) to the GNA Regulations

Such substitution of GNA quantum under Regulation 17.1(i) to GNA/under Regulation 17.1(iii) should not be allowed. If such substitution is allowed, it should be coupled with the following conditions:

- a. the entity shall submit the NOC from the STU **for the acknowledgement**
- b. the entity shall be liable for payment of the charges of the intra-State network as applicable **in case it is connected to both STU and CTU. Relinquishment charges should be with disconnection from STU. But relinquishment is not a ideal option as it hamper the transmission planning.**
- c. the entity shall be radially connected with the ISTS as 17.1(iii). **Radial connection is the correct option and it should be strictly for upcoming load for which they have not proposed the load enhancement before state DISCOMs.**

Issue No. 3: Dual Connectivity to the Bulk Consumer for the same load Capacity

- i. Grant of GNA to Bulk Consumer through dual connectivity, i.e., for the same load capacity **should not be allowed.**
- ii. If such a grant of GNA to Bulk Consumer through dual connectivity is allowed, it should 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.
 - 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.