Ref: PTC/CERC/ **Date:** November 11, 2024

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

Subject: Submission of Comments on the Staff Paper on modifications in the GNA Regulations.

Respected Sir,

At the outset, PTC India Ltd (PTC) appreciates the Hon'ble Commission (CERC) for providing stakeholders with the opportunity to review and provide feedback on the recent Staff Paper on Modifications in the General Network Access (GNA) Regulations dated 9th October 2024.

As a key participant in the power sector, we acknowledge the critical role that the GNA Regulations play in facilitating seamless connectivity and optimizing the utilization of inter-state transmission systems, especially given the growing share of renewable energy in India's energy mix.

We have thoroughly reviewed the proposed modifications outlined in the Staff Paper and would like to submit our comments and suggestions for your kind consideration. Our detailed feedback is attached herewith as Annexure - A for your reference. If deemed appropriate we are also available for in person interaction to clarify any aspect.

Thanking you,

Yours faithfully,
For **PTC India Ltd.**

Anand Kumar
Vice President (Corporate Strategy & IR)

PTC India

ANNEXURE - A

Comments on Proposed Modifications to the GNA Regulations

1. **Substitution of GNA Quantum:**

We support the proposal to permit the substitution of GNA quantum from Regulation 17.1(i) to Regulation 17.1(iii). This measure will allow entities to optimize their transmission charges and enhance access to renewable energy, supporting competitive power procurement. It seems appropriate that the relinquishment charges should only be applicable when there is an actual reduction in the use of the intra-State network. This clarification will ensure fair treatment and prevent unwarranted financial liabilities.

In response to the questions posed, such substitution should be allowed with the condition that the entity submits an NOC from the STU and remains liable for any applicable charges related to the intra-State network. This balances the need for flexibility with the responsibility for associated costs. Also, It is essential to align these changes with SERC regulations to maintain uniformity across jurisdictions and facilitate seamless implementation.

2. **Utilization of GNA by Non-GNA Grantees:**

We propose allowing the use of GNA granted to an entity (GNA grantee) by another connected entity that is not a GNA grantee. This will facilitate better utilization of transmission assets and give entities broader access to competitive energy, supporting their renewable purchase obligations. Such use should be permitted under the condition that the entity seeking to use the GNA provides an NOC from the STU and pays intra-state transmission charges as applicable. The original GNA grantee should retain primary liability for transmission charges, ensuring accountability.

This arrangement should be restricted to entities located within the same state or region as the GNA grantee and only allowed when sufficient transmission margin is available. This would prevent the need for augmentation of ISTS and promote optimal use of existing capacity. We support the waiver of transmission charges if the power drawn is from renewable energy sources, aligning with the goals of promoting clean energy.

3. **Dual Connectivity for Bulk Consumers:**

We support the provision of dual connectivity for bulk consumers, allowing them to access the same load capacity from both ISTS and intra-state networks. This setup enables consumers to draw power from ISTS during solar hours and switch to intra-state networks during non-solar hours, optimizing renewable energy use while maintaining grid stability. However, we emphasize the need for measures to prevent any misuse of this flexibility, such as restrictive drawal from ISTS to avoid the selective use of the CTU network merely to evade transmission charges.

Dual connectivity should be subject to conditions, such as the bulk consumer submitting an NOC from the STU and committing to pay charges for the intra-State network if already connected. Similarly, if connected to ISTS, they should pay the applicable ISTS charges.
Only bulk consumers committed to drawing renewable energy through both networks should be eligible for waivers under GNA-RE. If non-RE power is drawn through the intra-State network, the GNA-RE

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should convert to GNA with the associated charges as per the 2020 Sharing Regulations. This approach ensures that redundant capacity is not created without cost accountability, promoting fairness and system efficiency.

However, in case of bulk consumers with CPPs, they should be allowed to import/export power from ISTS and simultaneously export/import power through STU System.

4. Requirement for Conn-BG2 for Bulk Consumers:

We agree with the requirement for bulk consumers to submit Conn-BG2 for securing the cost of augmentation to the transmission system. This will align their obligations with those of generators and ensure that projects move forward with committed financial backing. Conn-BG2 should be submitted for all required system augmentations to provide security against project abandonment and to maintain the integrity of the grid. This measure protects the interests of transmission service providers and consumers alike. The Conn-BG2 amount should be tailored to reflect the scale of the required infrastructure to balance financial fairness with the goal of enhancing grid connectivity.

5. Transparency in the NOC Issuance Process:

We strongly support the development of a centralized online platform for NOC issuance by STUs. This platform would ensure transparency, streamline the process for applying for GNA, and reduce delays significantly, thus fostering a more efficient power market.

The platform should be designed to process applications within defined timelines and include mechanisms for appeals in cases where applications are unjustly delayed or denied. This will bolster market trust and ensure that no stakeholder faces undue delays. Such a platform should be accessible to all relevant parties, including CTU, RLDC, STUs, SLDCs, and applicants, to promote coordination and clarity in the transmission planning process.

6. Solar and Non-Solar Hour Connectivity:

We support the concept of differentiated connectivity for solar and non-solar hours as it would enhance the utilization of transmission assets and support a balanced grid. Allowing applicants to schedule power injection based on connectivity for solar and non-solar hours will optimize grid capacity usage.

Existing solar generators should be given the option to install storage and apply for non-solar hour connectivity within a defined timeframe (e.g., three months). This step will encourage investments in storage solutions and ensure more comprehensive grid usage. If a solar generator fails to implement storage within the stipulated period, the unutilized non-solar hour connectivity should be reassigned to other applicants, fostering efficient use of infrastructure.

7. Mandating Minimum Transmission Capacity Utilization:

We support the proposal for mandating a minimum annual capacity utilization threshold (e.g., 50%) for RHGS to ensure effective use of transmission resources. This mandate will prevent underutilization and make room for other potential users, thereby maximizing the value of transmission investments.

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A phased approach to implementing this requirement is advisable, allowing developers sufficient time to adjust their operational strategies. This balance promotes grid efficiency while providing developers with the necessary flexibility to comply.

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