



Pragati Power Corporation Limited
(Undertakings of Govt. of NCT of Delhi)
CIN- U74899DL2001SGC109135
(Regd. Off: "Himadri", Rajghat Power House Complex, New Delhi-110002)

No. GM (T) Green Energy/2024-25/

Date: 27.11.2024

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

Sub: Comments/suggestions on the Staff Paper on modifications in the GNA Regulations

- Ref.: 1. Public Notice No. L-1/261/2021/CERC dated 11.11.2024 seeking comments on Staff Paper on "Modifications in the GNA Regulations"
2. Workshop/discussion on the Staff Paper on Modifications in the GNA Regulations dated 19.11.2024
3. Ministry of Power (MoP), Govt. of India Scheme dated 12.04.2022

Dear Sir,

Pragati Power Corporation Ltd. owns two gas-based generating stations (PPS-III, Bawana & PPS-I, IP Estate) located in Delhi and the Hon'ble Commission determines the tariff of PPS-III, Bawana generating station. The October 2024 Staff Paper on modifications in the GNA Regulations addresses challenges that intra-state entities face when attempting to access inter-state systems under the GNA framework.

Earlier, Ministry of Power (MoP), Govt. of India issued scheme dated 12.04.2022 for flexibility in the generation and scheduling of thermal/hydro power stations through bundling with Renewable Energy (RE) & Storage power. Further, the Scheme dated 12.04.2022 was modified vide notification no. F.No.09/11/2021-RCM dated 28.09.2022. It is understood that the scheme is for all Generators including state owned intra-state embedded Generators like PPCL. Moreover, CERC (Indian Electricity Grid Code) Regulations 2023 has allowed scheduling from alternate source of power by a generating station in three (3) scenarios viz. **a)** Unit Shut Down (USD) in terms of clause (1) of Regulation 47 of these regulations, **b)** forced outage of unit(s); **c)** a generating station other than REGS replacing its scheduled generation by power supplied from REGS irrespective of whether such identified sources are located within or outside the premises of the generating station or at a different location. In this case of alternate source of scheduling, RLDC allows reduction of load from conventional generating station and schedule of the same quantity from REGS.

Further, as per the Clause 2 (f) & 3 (d) of Regulation 48 of CERC (Indian Electricity Grid Code) Regulations 2023, the generating station shall not be required to pay the transmission charges and losses for such sourcing & scheduling of power to supply to the buyer from alternate sources. Thus, on conjoint reading of the MoP Scheme dated 12.04.2022 and clause 48 of the CERC (Indian Electricity Grid Code) Regulations 2023, it is understood that no additional GNA is required to be sought by such users/Generators.


As Delhi DISCOMs do not require GNA to procure power from PPS-I and PPS-III because these plants are state embedded generators. It is understood that to replace conventional power of these power stations with RE power (ISTS connected) under MoP scheme or from alternate sources (ISTS connected) in case of forced outage and Unit Shut Down, DISCOMs/Generator shall require additional GNA. However, in accordance with Regulation 17.1 of the CERC GNA Regulations, 2022, entities allowed to apply for GNA are primarily distribution licensees, bulk consumers, and drawee entities directly connected to ISTS. State embedded Intra state generators, embedded ISGS generators, despite being classified as inter-state providers; do not fall under the allowed applicant categories, which restricts their ability to directly apply for GNA. This regulatory limitation restricts ISGS from leveraging the flexibility of GNA to integrate renewable energy and contribute to regional grid stability. Also the issue is not covered in the Staff Paper on modifications in the GNA Regulations.

In view of above, it is requested to include following provisions for obtaining GNA/GNA-RE by embedded intra-state State owned and state embedded ISGS generators in the future amendments of the GNA Regulations to allow such generators scheduling from alternate source of power in terms of IEGC 2023 and the MoP Scheme on flexibility in generation/scheduling of thermal power stations dated 12.04.2022:

1. Inclusion of Intra-state and State embedded ISGS Generators in GNA eligibility by allowing them to directly apply for GNA, particularly for renewable energy integration.

Thanking you,

Sincerely



27-11-2024

(Dr. R. K. Yadav)

General Manager (T), Green Energy