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Sent: Mon, 11 Nov 2024 19:00:18 +0530 (IST)
Subject: Staff Paper on modifications in the GNA Regulations - Comments from Purvah Green Power Pvt Ltd

Dear Sir,

This is in reference to the Public Notice dated 9th Oct 2024, inviting comments and suggestions on the Staff Paper on modifications in the GNA Regulations.

Please find enclosed, out comments and suggestions for your kind consideration.

Thanking you.

Regards

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Mohammad Farrukh Aamir

Purvah Green's Comments and Suggestions on Central Electricity Regulatory Commission Staff Paper for necessary modifications in the GNA Regulations

S.No	Issue No	Comments and suggestions
1	***Issue No. 1: Substitution of GNA quantum under Regulation 17.1(i) to Regulation 17.1(iii) to the GNA Regulations*** *i. Whether such substitution of GNA quantum under Regulation 17.1(i) to GNA under Regulation 17.1(iii) should be allowed?* *ii. If such substitution is allowed, should it be coupled with the following conditions:* *a. the entity shall submit the NOC from the STU.* *b. the entity shall be liable for payment of the charges of the intra-State network or relinquishment charges, as applicable.* *c. the entity shall be radially connected with the ISTS as 17.1(iii) entity*	This is a welcomed suggestion. Substitution of GNA quantum under Regulation 17.1(i) to GNA under Regulation 17.1(iii) should be permitted as this would help discoms optimise transmission charges and losses and savings if any, would consequently get passed on to the consumers as reduce consumer tariff. However, savings in transmission charges would occur only in cases where there is a consequent reduction in drawl from STU network by the Discom/ intra-state entity. Nevertheless, it is better to have this provision in the GNA regulations incorporated. Such substitution should not require a mandatory NOC from STU. But should be done under intimation to STU. Since, the Discom/ intra-state entity continues to be connected to STU network (as indicated in Para 2.4 of the staff paper), the transmission system would continue to be utilized and paid for by the discom/ intra-state entity as per extant SERC regulations. If the substitution, results in the Discom/ intra-state entity relinquishing its connectivity with the STU network, then the provision of SERC STU regulations would inherently apply.
2	***Issue No. 2: Use of GNA of a Connectivity grantee by an entity connected with an intra-State network that is not a GNA grantee.*** *i. Whether such utilisation of GNA of a GNA grantee can be allowed by an entity that is not a GNA grantee?*	Utilization of GNA of a GNA grantee by an entity connected that is not a GNA grantee and is connected to InSTS/ Discom should be permitted. Such utilization be permitted under submission of a NOC from STU/Discom affirming availability of transmission capacity in intrastate network to accommodate such power flow.

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	ii. If such use is allowed, should it be coupled with the following conditions: *a. Such request to be made along with the NOC from the STU towards availability of space in the intra-State network for such quantum of GNA and period.* *b. Such request for utilisation of GNA shall be from an entity located in the same State or same region as that of the GNA grantee. The additional conditionalities that need to be imposed for considering the GNA utilisation beyond the state.* *c. Such request should only be allowed based on the margin available in ISTS, and no augmentation in the ISTS is to be made to facilitate such use of GNA.* *d. Such utilisation shall be restricted to GNA only and not GNARE.* *iii. 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.*	Utilisation of GNA by a non-GNA grantee entity should be permitted for an entity located anywhere in the country and not necessarily in the same state or region where the original GNA grantee is located. Under GNA regime, the entire national grid is like a copper plate where any entity can draw from any source or inject power to any load located anywhere. Further, as GNA transfer is for only a period of 3 years, the transfer should be for margins available within the system only. In case CERC decides to allow transfer for say a period of 25 years, then requirement for additional network enhancement and corresponding bank guarantees to be given to CTU should arise. In that case the party taking GNA through transfer should pay the BGs and charges. The transfer of both GNA and GNA_{RE} should be permitted. ISTS waiver is based on the power scheduled from the RE generator, hence the waiver should be available entity 'B' which is scheduling RE power.
3	***Issue No. 5: Utilisation of the Connectivity granted to a subsidiary by another subsidiary of the same Parent company.***	This is a much-needed provision to be incorporated in the GNA Regulations. Presently, Regulation 15.1 permits utilization of connectivity granted to a parent company by a subsidiary company and vis-versa before COD of the project. Utilisation of connectivity should be permitted among different subsidiaries of the same parent company.

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	Whether such utilisation of Connectivity among the different subsidiaries of the same Parent company should be allowed or not?	Further, Regulation 15.3 provides for transfer of connectivity post COD of the REGS project, to any entity which acquires 51% or more shareholding of the company/subsidiary/ affiliate owning the REGS project. It is suggested, that transfer of connectivity should be permitted from parent to subsidiary, subsidiary to parent and subsidiary to subsidiary of the same Parent company only. For an entity, which is not a parent, and acquired 51% of the REGS, the transfer should be permitted only post COD as provided for under Regulation 15.3.
4	***Issue No. 6: Platform for providing NOC by the STU in a time-bound and a transparent manner*** *Whether such a centralized online platform is required to be implemented for processing the application for grant of NOC by the STU in terms of availability of transmission capacity in the intra-State network?*	Yes. A centralized online platform is much required for processing applications for grant of NOC by the STUs in terms of availability of transmission capacity in the intra-State network. This will facilitate transparency and accountability in the processing process. Such a portal should also be used for processing NOC applications from Discoms (or SLDC) as required under SERC Regulations. Bulk Consumers connected to grid at 11 KV or 220 KV require both STU and Discom NOCs for getting open access under GNA Regulations. Such a portal would facilitate processing of these NOCs. Ministry of Power vide its letter no 25-10/30/2024-PG dated 18.09.2024 has directed all States that the procedure to issue NOC by States to GNA applicants be incorporated with the state

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		single window system and which then be connected to National Single Window System. Hence, a centralized portal in this line is the need of the hour. In addition, such approvals from the State Transmission Utilities and Discoms as required, should be provided within 15 days from submission of NOC application as per Green Energy Open Access Rules 2022 failing which deemed approval should be granted by the system.
5	***Issue No. 7: Provision for grant of Solar hours Connectivity and Non-Solar hours Connectivity through the same Transmission system*** *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?*.	The concept of non-solar connectivity is welcomes and is novel in its nature to meet stated objectives. Following concerns may be looked into before the concept finalized: i. **Submission of application within 3 months:** It is not clear from which date is this 3-month period is to be counted. It is recommended that existing solar generators be provided min 6 months from the date of notification of the regulations providing for this. Post this 6-month period, connectivity may be granted to applicant applying for non-solar hour connectivity. The existing solar generator be also permitted to apply for non-solar connectivity post 6-months; however, the time-stamp would be followed. ii. **Treatment of power drawn during non-solar hours by solar generator:** Solar plant draws power during non-solar hours (viz late evening/night) from the grid, to meet auxiliary power requirement and which is treated at DSM rates. During the non-solar hours, the BESS which has been granted non-solar hour connectivity would be injecting

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		energy under its contracts, then wherefrom would a solar plant get its aux power and at what rates? Further, in solar hours, due to the addition of a co located BESS, the BESS would need to be charged during solar generation hours. The incumbent solar generator can provide excess power, if any, for charging power to the BESS or the BESS can set up its own solar plant or the BESS can buy charging power from third parties during the solar hours. In case own solar plant, dedicated only for charging with no grid injection, is used for BESS charging the energy accounting for charging power would be internal, simple and not require regional energy accounting. If third party charging power is used or power from incumbent solar plant is used, then energy accounting at POI for both simultaneous injection and drawl needs to be addressed. This may require net scheduling and special metering scheme approval which the Hon'ble CERC should clarify to avoid disputes both during solar and non-solar hours. iii. **Cost of sharing DTL and terminal bays:** Sharing of bay and dedicated transmission line of solar generators with Co-located BESS should be at benchmark costs used by PGCIL and approved by Hon'ble Commission. The commercial aspects, right and obligations for sharing of Bay and DTL should be under regulatory oversight. This would avoid disputes and litigations before the Commission.

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		iv. **CONN-4 Revision:** Addition of BESS will alter the technical requirements needed as per CONN-4 and would require fresh approval from CTU with consequent investments to be made. Regulations should mandate the incoming BESS to pay for any and all investments to be made to meet the revised requirements. It is further suggested that in case the connectivity is shared between two different entities the Bank Guarantees (Con BG 1,2,3) should be proportionately shared along with aforementioned common infra sharing charges. v. **Rights of Solar generator to be protected during Solar Hours:** The incumbent solar generator should have exclusive and inalienable statutory right on injection of power to the grid during the solar hours. Given, that a BESS can inject/ drawal during any 24 hrs and utilize the DTL and bay, first right for utilization of the connectivity and rescheduling should always be with the Solar generator. vi. **Size of BESS to be installed**: The maximum size of BESS that can be installed would ideally by limited to the solar connectivity granted. However, that may not always be the case. A 220kV DTL and Bay can carry 350 MW or more power (depending on the conductor it can be upto 400 MW) and is dependent on the evacuation margins available at the bay and the grid -substation. It is recommended that the maximum size of BESS that can be installed be clarified/ specified in the regulations.

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		Further, will the connectivity applications for non-solar hours be made under Regulation 5.2 of the GNA regulations with min 5 MW capacity that can be installed? If that be the case then the max capacity of BESS would be limited to the solar connectivity granted.
6	***Issue No. 8: Provision for Minimum Transmission Capacity Utilisation for Hybrid ISTS Connectivity*** An applicant should take Connectivity for a quantum that it wishes to utilise. It is 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. Alternatively, the quantum of Connectivity equal to the average of maximum injection in any time block of a day over the year (first year after the declaration of COD) may be allowed to be retained by the Connectivity grantee, and the balance quantum of the part of the Connectivity may be revoked (with corresponding Conn-BGs to be returned). Connectivity on such vacated capacity may be granted to other entities.	Tenders issued by REIAs/ Discoms specify the minimum CUF that is to be met by the RHGS. Prescribing a minimum annual CUF may not be commercially viable for RHGS grantee due to various requirements under the utility tenders/ C&I PPAs, which stipulate CUF and max-min CUF range, the ratio of wind and solar components in the hybrid mix etc. Further, the RHGS can be co-located or non-co-located. In case of non-co-located RHGS, the connectivity's are at separate and at different S/s but the power is scheduled under a single contract, with individual scheduled. In this case the utilization is limited to max of individual solar or wind CUF, and any curtailment would be detrimental. It is recommended that the minimum CUF requirement be contractually driven rather than mandated through regulations.

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