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Cc: jaydipchudasama@torrentpower.com, manveshparekh@torrentpower.com
Sent: Mon, 11 Nov 2024 16:13:01 +0530 (IST)
Subject: Comments _ Staff Paper for necessary modifications in the GNA Reg.

Dear Sir/Madam ,

This is with reference to the comments invited by the Hon'ble Commission on Staff Paper for necessary modifications in the GNA Regulations.

In this regard, we Torrent Power Limited take this opportunity to express our gratitude for giving us an opportunity to submit our comments/ suggestions on the subject matter.

We earnestly request you to give due consideration to our comments/ suggestions attached herewith while finalizing the said notification.

Regards,
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Torrent Power Limited - Comments/ Suggestions on Staff Paper for necessary modifications in the GNA Regulations

Description	Proposed clause under the Staff Paper	Suggestion	Rationale
<p>Issue No. 5: Utilisation of the Connectivity granted to a subsidiary by another subsidiary of the same Parent company.</p>	<p>Whether such utilisation of Connectivity among the different subsidiaries of the same Parent company should be allowed or not?</p>	<p align="center">-</p>	<p>We welcome the initiative taken by Hon’ble CERC by considering the utilisation of Connectivity among the different subsidiaries of the same Parent company. In this, we would like to request Hon’ble Commission to kindly also consider the utilisation of Connectivity only among the wholly owned subsidiaries of the parent company.</p>
<p>Issue No. 7: Provision for grant of Solar hours Connectivity and Non-Solar hours Connectivity through the same Transmission system</p>	<p>It is proposed that the existing connectivity grantee, which was solar-based REGS, shall be mandated to share the dedicated grid infrastructure (terminal bay and the dedicated transmission line) with payment of charges for the dedicated transmission infrastructure (as mutually agreed or as determined by CERC in case of disagreement). For solar hours, the new grantee shall be allowed to schedule power if the transmission system is available after scheduling power of existing solar REGS. The hours other than solar hours shall be treated as non-solar hours. It is clarified that the existing solar REGS can also seek GNA (non-solar)/connectivity at par with the new entity.</p>	<p>It is proposed that the existing connectivity grantee, which was solar-based REGS, shall be mandated to share the dedicated grid infrastructure (terminal bay and the dedicated transmission line) with payment of proportionate charges, submission of corresponding BGs, proportionate annual O&M charges and other charges as applicable for the dedicated transmission infrastructure (as mutually agreed or as determined by CERC in case of disagreement). For solar hours, the new grantee shall be allowed to schedule power if the transmission system is available after scheduling power of existing solar REGS. The hours other than solar hours shall be treated</p>	<p>In this regard, we would like to humbly submit that Hon’ble Commission may consider the suggested modifications and also consider providing suitable provision for sharing of cost, obligations and rights under this mechanism in order to avoid dispute among the entities.</p>

		as non-solar hours. It is clarified that the existing solar REGS can also seek GNA (non-solar)/connectivity having priority over the at par with the new entity.	
Issue No. 8: Provision for Minimum Transmission Capacity Utilisation for Hybrid ISTS Connectivity	8.6 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.	8.6 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 5 years (first year after the declaration of COD) with the variation of 10% 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.	In this regard, it is submitted that due to the varying nature of the wind/solar generation and specific requirements under the utility tenders/C&I PPAs etc. prescribing a minimum annual CUF i.e., 50%, may not be commercially viable for every RHGS grantee. Basis this, we request Hon'ble Commission that utilization of the transmission capacity during the preceding 5 years may provide better clarity on the utilisation of transmission system by the connectivity grantee. Therefore, Hon'ble Commission may consider the quantum equivalent to the average of maximum injection in any time block of a day over 5 years with the variation of an additional 10% as the quantum of Connectivity to be retained by the Grantee.