

From: sonika hayaran <sonika.hayaran@zelestra.energy>
To: Shilpa Agarwal <shilpa@cercind.gov.in>, Harpreet Singh Pruthi <secy@cercind.gov.in>
Cc: jayakrishnan chonat <jayakrishnan.chonat@zelestra.energy>
Sent: Fri, 29 Nov 2024 17:59:41 +0530 (IST)
Subject: Zelestra's Comments on Staff paper for necessary modifications in the GNA Regulations

Dear Mam/Sir,

Greetings from Zelestra!

Please find the enclosed comments on the 'Staff Paper on modification of GNA' for your kind consideration.

Sonika Hayaran
Regulatory Manager

sonika.hayaran@zelestra.energy
www.zelestra.energy <<http://www.zelestra.energy>>

Zelestra’s Comments on Staff paper for necessary modifications in the GNA Regulations published by CERC

Issue as discussed in Staff Paper	Comments
Issue No. 5: Utilisation of the Connectivity granted to a subsidiary by another subsidiary of the same Parent company.	We welcome this initiative, Connectivity transfer from one SPV to another SPV of the same parent company should be allowed
Issue No. 6: Platform for providing NOC by the STU in a time-bound and a transparent manner	For development of ISTS connected C&I projects, the online portal may be developed with specific timeline (say 15 days) for issuance of NoC by STU. In case STU/Discoms do not start action within specified time, the Noc shall be self-issued from portal, especially for exiting consumer who are already connected to the Network of the Discoms/STU.
Issue No. 7: Provision for grant of Solar hours Connectivity and Non-Solar hours Connectivity through the same Transmission system	<ul style="list-style-type: none"> • We propose that existing solar generators shall be given the priority for utilisation of connectivity/GNA during non-solar hours by applying to CTUIL within 1 year from COD of the Solar generator and installing (BESS/wind) within a period of 24 months thereafter. • Further, Auxiliary power used by solar generators may be considered while releasing connectivity during non-solar hours. • It is also requested to match waiver of ISTS charges percentage same for non-solar connectivity applicant as applicable for Solar-hour connectivity applicant to encourage more and more applicant to come forward to apply connectivity during non-solar hours which will ultimately sooth the grid in solar rich areas. It is understood that recovery of such Transmission assets is already being recovered through socialisation.
Issue No. 8: Provision for Minimum Transmission Capacity Utilisation for Hybrid ISTS Connectivity	It is proposed that after CoD, 3 years data may be considered to make decision on reduction of connectivity