

**CENTRAL ELECTRICITY REGULATORY COMMISSION
NEW DELHI**

Petition No.132/MP/2024

Subject : Petition under Section 79 read with Section 38 of the Electricity Act, 2003 and Regulations 4.1 and 5.6 of Central Electricity Regulatory Commission (Connectivity and General Network Access to the Inter-State Transmission System) Regulations, 2022.

Petitioner : Reliance Industries Limited (RIL)

Respondents : Central Transmission Utility of India Limited (CTUIL) and Ors.

Petition No.161/MP/2024

Subject : Petition under Section 79 read with Section 38 of the Electricity Act, 2003 and Regulations 15.1 and 23.1 read with 4.1 and 17.1 of the General Network Access Regulations, 2022, thereby imploring this Commission to exercise its regulatory powers, for the purpose of facilitating the Petitioner's subsidiaries and group companies in utilizing the existing GNA/connectivity of the Petitioner at Jam Khambhaliya ISTS substation, in part or full.

Petitioner : Reliance Industries Limited (RIL)

Respondent : Central Transmission Utility of India Limited (CTUIL)

Date of Hearing : **5.6.2024**

Coram : Shri Jishnu Barua, Chairperson
Shri Arun Goyal, Member
Shri Ramesh Babu V., Member

Parties Present : Shri Buddy Ranganadhan, Advocate, RIL
Ms. Supriya Rastogi, Advocate, RIL
Shri Lakshyaji Singh, Advocate, RIL
Shri Harshit Singh, Advocate, RIL
Ms. Suparna Srivastava, Advocate, CTUIL
Ms. Divya Sharma, Advocate, CTUIL
Shri Siddharth Sharma, CTUIL
Ms. Kavya Bhardwaj, CTUIL
Shri M. G. Ramachandran, Sr. Advocate, GUVNL
Ms. Srishti Khindaria, Advocate, GUVNL
Shri Aneesh Bajaj, Advocate, GUVNL
Shri Tushar Mohapatra, WRLDC / GCIL
Shri Momai Dey, WRLDC / GCIL
Shri Gajendra Sinh, WRLDC
Shri Ashok Rajan, WRLDC

Record of Proceedings

At the outset, learned senior counsel for Respondent 9, Gujarat Urja Vikas Nigam Limited, in Petition No. 132/MP/2024 submitted that Respondent has been impleaded pursuant to the direction of the Commission vide Record of Proceedings for the hearing dated 8.5.2024 and be permitted additional time to file a reply in the matter.

2. Learned counsel for the Petitioner, as such, did not oppose the above request made by the learned senior counsel for the Respondent, GUVNL and urged that the matter be listed at the earliest.

3. Learned counsel for Respondent, CTUILL, pointed out that the Respondent, WRLDC, vide its affidavit dated 17.5.2024, has made certain observations relating to the aspects of the Scheduling, Accounting, and Deviation Settlement, Pooling & De-Pooling of energy interchanges, etc. and the Petitioner vide its affidavit dated 4.6.2024 has given its suggestions to the said comments, which may also be considered by the beneficiaries – while filing their replies in the matter. Learned counsel also clarified that the reply of CTUILL, in this matter, is restricted to the aspects of transmission planning and/or optimal utilisation of the transmission infrastructure only.

4. The representative of Respondent, GCIL, while pointing out their concerns to the proposal of the Petitioner, mainly submitted as under:

(a) The Petitioner intends to connect a Bulk Consumer and Wind-Solar Hybrid RE Generating Station at the same ISTS interface point, i.e., Jam Khambhaliya Pooling Station, which is not permitted under the extant Regulations.

(b) Two Regional Entities, namely, Bulk Consumer and RE Hybrid Generating Station, shall have two distinct control areas with separate scheduling, metering, energy accounting, and metering at the Point of Interconnection (PoI). The Petitioner's proposal to connect these two different categories of the Regional Entities (Bulk Consumer-drawee entity and RE Hybrid Generating Station- injecting entity) at single PoI would lead to scheduling, metering, energy accounting, and monitoring of actual interchange in real time for these two separate Regional Entities at same PoI and real time reconciliation of such data would not be possible.

(c) IEGC Regulations, 2023 do not have any provisions that facilitate segregation of energy interchanged by a Bulk Consumer and RE Hybrid Generating Station, connected to a single PoI.

(d) The Central Electricity Regulatory Commission (Deviation Settlement Mechanism and related matters) Regulations, 2022 also have different provisions for Bulk Consumer (Buyer) and RE Hybrid Generating Station (Seller).

(e) The Central Electricity Authority (Technical Standards for Connectivity to the Grid) Regulations, 2007, and the subsequent amendments thereto provide separate regulatory requirements to be complied with by the Bulk Consumer and the RE Hybrid Generating Stations at the PoI level. The proposal of the Petitioner for connecting Bulk Consumer and RE Hybrid Generating Station at a single PoI will lead to non-compliance with the various regulatory requirements as specified therein.

(f) Presently, there is no methodology to facilitate, verify, and monitor the compliances to the standards (as specified in the CEA Connectivity Standards) at the common PoI level in case PoI is being shared by the Bulk Consumer and RE

Hybrid Generating Station. The views of the CEA in this regard are also necessary, and accordingly, the Commission may also invite the comments of the CEA on the proposal of the Petitioner.

(g) The Petitioner, in its reply dated 4.6.2024 to the above aspects, has submitted that the Petitioner (RIL) may act in a role similar to that of a lead generator – being responsible for connected entities (both generator & bulk consumer). However, the said suggestion is impermissible as the regulatory requirements/stipulations for the connected entities, i.e., Bulk Consumer and RE Hybrid Generating Station, as pointed out, are quite different & distinct. GCIL is, as such, not agreeable to the suggestions put forth by the Petitioner in its above reply.

(h) The Petitioner has also placed reliance on the Commission's order dated 29.1.2020 in Petition No. 299/MP/2018 in the matter of BALCO v. PGCIL & Ors. However, the said order may not strictly apply to the present case.

5. Learned counsel for the Petitioner submitted that the Petitioner vide its affidavit dated 4.6.2024 has already furnished its suggestions to the above concerns raised by WRLDC in its reply dated 17.5.2024, and Respondent, WRLDC / GCIL are yet to formally respond to these suggestions, in case they are not feasible as per them. Learned counsel also added that keeping in view that the proposal of the Petitioner is aimed towards optimal utilisation of the transmission infrastructure, the Commission may request CEA to hold a meeting with the participation of the Petitioner, CTUIL, GCIL, and other concerned stakeholders to resolve/propose solution to the concerns raised by GCIL/ WRLDC.

6. Insofar as Petition No.161/MP/2024 is concerned, learned counsel for the Respondent, CTUIL, sought liberty to file its reply in the matter. Learned counsel also submitted that if the Commission so deems fit, GCIL may also be impleaded in the said matter, and its views/comments may be invited & considered on the subject matter involved therein. In response, learned counsel for the Petitioner indicated that views of GCIL in Petition No. 161/MP/2024 may not be necessary as the issue merely involves the utilisation of existing GNA/connectivity of the Petitioner at Jam Khambhaliya by its subsidiaries or group companies. Learned counsel also requested that the said matter may be kept for hearing along with Petition No.132/MP/2024.

7. Considering the submissions made by the learned senior counsel and learned counsels for the parties, the Commission ordered as under:

Petition No.132/MP/2024

(a) Respondents to file their reply within 10 days with a copy to the Petitioner who may file its rejoinder, if any, within three days thereafter.

(b) Respondent(s), WRLDC or GCIL, to file their response to the affidavit of the Petitioner dated 4.6.2024 within five days.

(c) The CEA to convene a meeting with the participation of the Petitioner, CTUIL, GCIL, and other concerned stakeholders to resolve/propose solutions to the concerns raised by GCIL/ WRLDC and the Petitioner to file the outcome of the meeting before the next date of the hearing.

Petition No. 161/MP/2024

(d) Respondent, CTUIL will file its reply within a week with a copy to the Petitioner, who may file its rejoinder within a week thereafter.

8. The Petitions will be listed for the hearing on **27.6.2024**.

By order of the Commission
Sd/-
(T.D. Pant)
Joint Chief (Law)