



एनटीपीसी विद्युत व्यापार निगम लिमिटेड  
(एनटीपीसी लिमिटेड की पूर्ण स्वामित्व वाली सहायक कम्पनी)

**NTPC Vidyut Vyapar Nigam Limited**  
(A Wholly Owned Subsidiary of NTPC Limited)

केन्द्रीय कार्यालय/Corporate Centre

Date: 31<sup>st</sup> Jan 2025

To,

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

**Subject:** Submission of comments/ suggestions on 'Draft Central Electricity Regulatory Commission (Cross Border Trade of Electricity) (Second Amendment) Regulations, 2024'

Sir,

Greetings from NVVN!

This is with reference to Public Notice 'Draft Central Electricity Regulatory Commission (Cross Border Trade of Electricity) (Second Amendment) Regulations, 2024' dated 31.12.2024.

We hereby would like to propose a few additional suggestions as Annexure -I for your kind consideration please.

Thanking You,

Yours Sincerely,

  
Arvind Patle

Addl. General Manager (SO & Commercial)

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Corporate Identification Number : U40108DL2002GOI117584

## Annexure- I

### NVVN Comments on Draft CERC (Cross Border Trade of Electricity) (Second Amendment) Regulations, 2024

**General:** Cross border power trade in recent past has seen many new developments e.g. trading of power by cross border entities in Indian power exchanges, implementation of new cross-border transmission lines etc. Import of renewable hydro power to India is also increasing with capacity growth in neighbouring countries. In view of significant hydro capacity development potential in our neighbouring countries and integrated grid operation of our system with cross-border entities, proposed draft amendments by Hon’ble CERC will be addressing critical concerns for intended growth in cross-border electricity trade.

However, we would like to propose a few additional suggestions for consideration by Hon’ble Commission:

Sl. No. in Draft	Clause in CERC’s CBTE -2019/ Proposed Draft Amendment	NVVN’s Suggestions	Remark/Reasoning
7(2)	<p><b>Amendment to Regulation 8(1) of Principal Regulations</b></p> <p>“A Participating Entity located in a neighboring country, for the purpose of injection into or drawl from the Indian grid, shall be required to seek connectivity or GNA or T-GNA, as the case may be, through separate applications:</p> <p>Provided that an electricity trading licensee of India engaged in cross border trade of electricity may seek GNA or T-GNA, in accordance with these Regulations.”</p>	<p>“A Participating Entity located in a neighbouring country, for the purpose of injection into or drawl from the Indian grid, shall be required to seek connectivity or GNA or T-GNA, as the case may be, through separate applications:</p> <p>Provided, an electricity trading licensee of India engaged in cross-border trade of electricity may also seek GNA or T-GNA <b>on behalf of the Participating Entity located in the neighboring country in accordance with these Regulations. However, the Connectivity GNA agreement shall be signed by the participating entity of the</b></p>	<p>Trading licensee may apply GNA /T-GNA on behalf of neighbouring country and associated agreements with CTU should be signed by the cross-border entity.</p> <p>Under Trilateral Cross-border Agreement enablement is required to promote/ facilitate power trading safeguarding Indian entities limited role, revenue vis-à-vis obligations in Trilateral trade.</p>



		<p>neighboring country.</p> <p><b>Provided that in case of power supply under Tripartite agreement for transaction across India involving two neighboring countries, injecting entity located in the neighboring country may also apply for GNA for drawl of power on behalf of the drawee entity located in the other neighboring country”</b></p>	
8(3)	<p><b>Amendment to Regulation 9(3) of Principal Regulations</b></p> <p>“The fee for T-GNA applications shall be Rs 5000 in Indian Rupees per application.”</p>	<p>“The fee for T-GNA applications shall be as specified in the GNA Regulation 2022 or any subsequent amendments.”</p>	<p>To ensure alignment with the GNA Regulation 2022, fee for T-GNA applications may be kept same as GNA regulations/amendments.</p>

*AS*

11(2)	<p><b>Amendment to Regulation 12 of Principal Regulations:</b>  “12 (1-ii) GNA under these regulations may be applied for a period of eleven months or more: Provided that where augmentation of ISTS of India is required for the grant of GNA, GNA shall be applied for a period of sixty months or more. “</p>	<p>“GNA under these regulations may be applied for a minimum period of eleven months or more.  Provided that where augmentation of ISTS of India is required for the grant of GNA, GNA shall be applied for a period of sixty months or more.  Provided that the existing granted deemed GNAs in respect of cross border power trading shall be applicable upto the “cross border power trading agreement end date.”</p>	<p>Deemed GNAs in respect of existing cross border power trade should end on agreement end date.</p>
NEW CLAUSE	<p><b>Amendment to Regulation 14 of Principal Regulations:</b>  “In case of delay in achieving commercial operation date  .....”</p>	<p><b>Proviso may be added for Trilateral agreement cases in Regulation 14:</b>  “Provided that in case of power supply under Tripartite agreement for transaction across India involving two neighbouring countries, in case of delay in achieving commercial operation date of generating station or unit(s) thereof and/or associated dedicated transmission system in the neighbouring country beyond the scheduled date agreed in the GNA Agreement, the generator in the neighbouring country shall be liable to pay the GNA charges for injection as well as for drawl irrespective of who has obtained GNA for injection or drawl.”</p>	<p>Since Cross Border drawee entity does not have multiple options for using the GNA sanctioned (clearances/ MOP approval required for alternate transactions), the defaulting entity (Generator) should bear the consequential penalty for both injection as well as drawl.</p>

Other	In ' <i>Detailed Procedure for Connectivity and GNA</i> ' under Regulation 39.1 of the CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2022. For Grant of Connectivity and GNA, it is required to submit Notarised Affidavit as per FORMAT-AFFIDAVIT.	<b>“In case of Cross border power trade, for Connectivity and GNA, Affidavit need not to be notarised by applicant .”</b>	In cross border power trade, Affidavit need not to be authorised due to different legal systems in cross border countries. Requirement of notarization of affidavit can be eliminated.
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