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Subject: APPCC Comments on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Third Amendment) Regulations, 2024.

Sir/Mam,

Please find the attached document containing comments from APPCC on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Third Amendment) Regulations, 2024.

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Regards,

O/o DGM/CGS & PGCIL/APPCC

APPCC Comments on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Third Amendment) Regulations, 2024.

S.No	Reg No.	Regulation	Remarks
1	23.3	<p>A new Regulation 23.3 shall be inserted below Regulation 23.2 of the Principal Regulations as under :</p> <p><i>“23.3 NLDC shall make a web portal where a list of GNA grantees with their GNA quantum shall be displayed. The GNA Grantees shall be able to indicate the GNA quantum, dates, and time blocks for which such quantum can be made available, for use by other GNA grantees. GNA grantees who wish to use the GNA of another GNA grantee shall also be able to indicate their requirement of GNA quantum along with dates and time blocks for which such quantum is required .”</i></p>	<p>The creation of web portal for displaying the list of GNA grantees and their available GNA quantum is a welcoming move. It helps the beneficiaries who are seeking for GNA to easily identify the quantum available and utilise the transmission corridor optimally. However, it is also requested to arrange for PSM(payment security mechanism) for timely payments of GNA charges from the entities who have borrowed the GNA quantum of original beneficiary.</p>
2	26.2	<p>A proviso shall be added under Regulation 26.2 of the Principal Regulations as under: <i>“Provided that the entity covered under clause (ii) of Regulation 26.1(a) may seek T-GNA maximum up to 30% of the GNA granted.”</i></p>	<p>Limiting the TGNA to 30% of GNA will force the needy consumers to overdraw.Hence it is requested to alternatively modify the clause that, if the TGNA is >30% of GNA for more than 50% of time blocks in a month then the capping may be applicable for the subsequent month.</p>
		<p>“34A Operating charges for transactions under T-GNA</p> <p><i>34A.1. Operating charges at the rate of Rs 1000 per day or part of the day for Advance T-GNA or Exigency T-GNA under bilateral transactions shall be payable by the applicant to the host Regional Load Despatch Centre.</i></p>	

3	34A	<p>34A.2. In case of collective transactions, NLDC operating charges shall be payable to the respective power exchange by each of the successful buyer and seller on the basis of their energy scheduled (MWh) by NLDC @ Rs 1/MWh subject to a maximum of Rs 200 per day. The NLDC operating charges collected by the power exchanges shall be transferred to NLDC on a daily basis. The Power Exchanges shall provide NLDC with a daily list of successful participants along with their volumes cleared and the NLDC operating charges levied on these successful participants. Provided that under collective transactions, operating charges shall be payable for drawal schedules more than GNA quantum or T-GNA quantum or both, as applicable. Explanation: In order to determine whether the drawal schedule is more than GNA quantum or T-GNA quantum or both in case of collective transactions, SLDC shall furnish to NLDC, intra-state entity-wise details of the schedule under GNA or T-GNA, as the case may be. NLDC shall issue power exchange-wise and entity-wise segregation of payable operating charges under T-GNA for collective transactions.</p>	<p>The State Discoms connected to STU are already granted with GNA and are also paying non refundable application fees for availing TGNA through NOAR portal. In this regard, additional cost for Operating charges would cause financial burden to these entites. This clause may be implimented explicitly to only entities which are not granted GNA</p>
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