



ग्रिड कंट्रोलर ऑफ इंडिया लिमिटेड
(भारत सरकार का उद्यम)
GRID CONTROLLER OF INDIA LIMITED
(A Government of India Enterprise)



[formerly Power System Operation Corporation Limited (POSOCO)]
राष्ट्रीय भार प्रेषण केन्द्र / National Load Despatch Centre

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Ref: GRID-INDIA/NLDC/CERC/

Date: 17th Sep 2024

सेवा में,
सचिव,
केन्द्रीय विद्युत विनियामक आयोग
6th, 7th एवं 8th फ्लोर, टावर बी, वर्ल्ड ट्रेड सेंटर
नौरोजी नगर, नयी दिल्ली, 110029

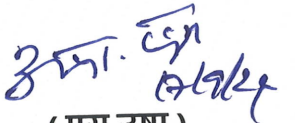
विषय: Suggestions on the Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Third Amendment) Regulations, 2024

महोदय,

The Hon'ble Commission has notified the Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Third Amendment) Regulations, 2024 on dated 31.07.2024.

The suggestions on behalf of Regional Load Despatch Centres (RLDCs) and National Load Despatch Centre (NLDC) on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Third Amendment) Regulations, 2024 are enclosed herewith for kind perusal and consideration of the Hon'ble Commission.

सधन्यवाद,


(एस उषा)

मुख्य महाप्रबंधक, (प्रभारी), रांभांप्रे०के०

Copy to:

1. CMD, Grid-India
2. Dir (MO), Dir(SO) Grid-India
3. Heads of RLDCs



Grid Controller of India Limited
(A Govt. of India Enterprise)
(Formerly Power System Operation Corporation Limited)

Date – 17-09-24

Grid-India observations and suggestions on Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) (Third Amendment) Regulations, 2024.

1.0 Provision in Draft Regulation:

Clause 2.1

Quote

A new Clause, namely, Clause (j-i), shall be added after Clause (j) in Regulation 2.1 of the Principal Regulations as under:

“(j-i) “Complex of ISTS substations” or “Cluster of ISTS substations” means the group of ISTS substations clustered together as a complex, based on geographical proximity and ISTS planning undertaken by CTU, as declared by CTU on its website for the ISTS substations which have already been commissioned or are under construction or approved by National Committee on Transmission (NCT). On approval of a new ISTS substation by NCT, CTU shall declare the Cluster in which such new substation shall be included;

Unquote

Suggestion:

The definition of cluster may be suitably elaborated, so that any voltage, reactive power, stability constraints are duly taken care while defining such complex/cluster. Further, the criteria for selecting substations under such complex/cluster may be defined and the distance among the ISTS substations within such cluster may be specified.

2.0 Provision in Draft Regulation:

Clause 14.1

Quote

A new Regulation 9.3 shall be inserted below Regulation 9.2 of the Principal Regulations as under:

“9.3 The Applicants who have been issued an in-principle grant of Connectivity or final grant of Connectivity to ISTS, for the generation projects based on particular renewable energy source(s) (with or without ESS) may, for the same connectivity quantum, change to another renewable energy source(s) (with or without ESS) or ESS in part or full, by making an application to the Nodal Agency for approval for such change within 18 months from the in-principle grant of Connectivity. The Nodal Agency may carry out system studies, as required, and approve or reject the change in energy source within 30 days of application by the Applicant. On approval of such

change of renewable source(s), the entity shall submit the technical data for changed renewable energy source(s), and CTU shall incorporate the necessary change in connectivity agreement, if already signed."

Unquote

Suggestion:

Regulation maybe suitably modified so that no change in the sources can be made after submission of Con-4 documents.

3.0 Provision in Draft Regulation:

Clause 21.1

Quote

A new Regulation, namely, Regulation 11C, shall be added after Regulation 11B of the Principal Regulations as under:

"11C.....

(1)

a.

b. An entity that has been issued a final grant of Connectivity at an ISTS substation located in the Complex of ISTS substations may seek reallocation of its Connectivity for another ISTS substation within the same ISTS complex where a bay has fallen vacant. Such reallocation shall be subject to commercial liabilities as per the Sharing Regulations 2020:

.....

Unquote

Suggestion:

Provision for detailed study of interconnection by the nodal agency should be there for approving the reallocation otherwise it may lead to operational challenges.

4.0 Provision in Draft Regulation:

Clause 26.1

Quote

Regulation 17.3 of the Principal Regulations shall be substituted as under:

"17.3 The Applicant covered under Regulation 17.1(iii) of these regulations may apply for a grant of GNA, by seeking interconnection at (i) a terminal bay of an ISTS sub-station already allocated to another such entity covered under Clause (iii) of Regulation 17.1, or (ii) a terminal bay of an ISTS sub-station already allocated to another entity covered under Regulation 4.1 of these regulations, or (iii) switchyard of a generating station having Connectivity to ISTS, with an agreement duly signed between the Applicant and the said

entity for sharing the terminal bay or the switchyard and the dedicated transmission lines, if any:

Explanation: The necessary metering, accounting, and scheduling arrangements for such entities shall be governed by the detailed procedure notified under Regulation 5.6 of these Regulations."

Unquote

Suggestion:

Under this clause, CTU may specify the condition for sharing of connectivity grant in the detailed procedure, this may also include any priority scheduling and curtailment.

5.0 Provision in Draft Regulation:

Clause 29.1

Quote

A new Regulation 23.3 shall be inserted below Regulation 23.2 of the Principal Regulations as under:

"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."

Unquote

Suggestion:

The nodal agency for GNA grant/ GNA Transfer is CTUIL. Hence, the portal should be developed & maintained by CTUIL and this should facilitate automated transfer of GNA data from CTUIL portal to the NLDC for scheduling and the uses. Accordingly the responsibility may be assigned to CTU which is nodal for grant & transfer of GNA.

6.0 Provision in Draft Regulation:

Clause 36.1

Quote

A new Regulation, namely, Regulation 34A, shall be added after Regulation 34.6 of the Principal Regulations as under:

"34A Operating charges for transactions under T-GNA

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.

34A.2.....

Unquote

Suggestion:

Grid India welcomes the clause for introducing operating charges for transactions under T-GNA.
