

No. HZL /CPP/Power/2024-25/

Dt. 17-09-2024.

The Secretary,
Central Electricity Regulatory Commission
3rd & 4th Floor Chandrlok Building
36, Janpath, New Delhi- 11001

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

Ref: Public notice dated 31st July 2024 (Notification No. L-1/261/2021/CERC)2024 commission for inviting written suggestion /comments stakeholder.

Respected sir,

This is reference to the public notice dated issued by hon'ble commission for inviting written suggestion /comments from stack holder on draft Central **Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Third Amendment) Regulations, 2024.**

We are hereby submitting our comments on the above subject referred for kind consideration of the hon'ble commission.

Enclosed – Annexure -1

Thanking You


Authorized Signatory (V. Joyaraman)

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Annexure

Provision in draft regulation	Comments
<p>5 Application for Grant of Connectivity</p> <p>5.6 An Applicant may apply for grant of Connectivity at (i) a terminal bay of an ISTS sub-station already allocated to another Connectivity grantee or (ii) switchyard of a generating station having Connectivity to ISTS, or (iii) switchyard of an entity covered under Regulation 17.1(iii) of these regulations with an agreement duly signed between the Applicant and the said Connectivity grantee or the generating station having Connectivity to ISTS, or the GNA grantee covered under Regulation 17.1(iii), as the case may be, for sharing the terminal bay or the switchyard and the dedicated transmission lines, if any. The applicable Connectivity Bank Guarantee as per Regulation 8 of these regulations shall be submitted by such Applicant:</p> <p>Provided that where an Applicant is seeking Connectivity at the terminal bay or switchyard of an entity covered under Regulation 17.1(iii) of these regulations having Connectivity to ISTS, the necessary metering, accounting, and scheduling arrangements shall be as per the Detailed Procedure to be prepared by NLDC in this regard, in consultation with CTU, CEA, RPCs, and RLDCs."</p>	<p>Some entity is going to transition from co located conventional sources to non conventional sources to achieve net Zeo carbon emission. Sharing of Tr. Line /switchyard will enable to utilize existing infrastructure of power plant in same campus to cater load requirement at other load centre as well as to sale to others. By arrangement as per proposed amendment will enable to utilise the asset and avoid ROW issue which is major concern for every entity and also reduce transmission losses as generation and load will be at same location. Balco Vedanta have dual connectivity on common dedicated transmission connected from ISTS network with required metering arrangement. it is proposed to amended as proposed by Hon'ble commission.</p>
<p>17 Eligibility for GNA</p> <p>"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."</p>	

V. Jagan