

Ref. No: CE/PP/284-76

Date: 12-09-2024

To
The Secretary,
Central Electricity Regulatory Commission,
3 rd & 4th Floor, Chandralok Building, 36,
Janpath, New Delhi-110001

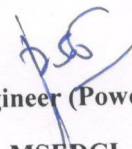
Subject: Submission of comments/suggestions on Draft CERC (Connectivity and General Network Access to the interstate Transmission System)Third Amendment Regulations ,2024

Reference: 1) L-1/261/2021/CERC Dated 30.08.2024
2) L-1/261/2021/CERC Dated 31.07.2024

Respected Sir,

This is in reference to above cited subject, please find attached herewith MSEDCL's comments /suggestions/objections on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the interstate Transmission System)Third Amendment Regulations ,2024

It is requested to consider these comments/suggestions while finalizing (Connectivity and General Network Access to the interstate Transmission System)Third Amendment Regulations ,2024.


Chief Engineer (Power Purchase)
MSEDCL

Copy submitted with respect to:

1. Director(Commercial), MSEDCL, Mumbai
2. Executive Director(Commercial), MSEDCL, Mumbai

MSEDCL's COMMENTS ON CENTRAL ELECTRICITY REGULATORY COMMISSION (CONNECTIVITY AND GENERAL NETWORK ACCESS TO THE INTER-STATE TRANSMISSION SYSTEM) (THIRD AMENDMENT) REGULATIONS, 2024

Clause	Notified Regulations	Draft Amendment	MSEDCL Comments
23.3	N/A	<p><i>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>It is submitted the GNA grantees that are offering their GNA for usage of others shall have the right to re-call their GNA one day prior to the date on which the GNA is being offered, through this portal, without creating any liability to these GNA grantees.</p> <p>It is further submitted that the clarity may be provided on the detailed computation of the charges that are to be paid by other entities sharing the GNA of the GNA grantee for any particular period of time (i.e. sharing of part GNA for a minimum period of less than a month to a maximum period of more than a year).</p> <p>Also, to avoid any disputes on the computation of charges with respect to sharing of GNA, it is requested that NLDC may regularly communicate the information regarding the sharing of GNAs to CTU and CTU may compute the sharing of charges among the two entities sharing the GNA for a particular period of time.</p>
34 A	N/A	<p><i>“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</i></p>	<p>It is submitted that the Distribution Licensees are liable to pay the RLDC fees and charges as per the notified Regulations of CERC. These fees and charges contribute to the total ARR</p>

		<p><i>transactions shall be payable by the applicant to the host Regional Load Despatch Centre.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>Explanation: In order to determine whether the drawl 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.</i></p>	<p>of the RLDCs and hence RLDCs are able to recover all its expenses including RoE through the RLDC fees and charges levied on the Distribution Licensees. Therefore, there is no need to separately levy operating charges of T-GNA to the Distribution Licensees. RLDCs through fees and charges are suitably compensated for all its legitimate expenses that needs to be recovered under regulatory regime.</p>
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