



Punjab State Power Corporation Limited

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Corporate Identity Number (CIN): U40109PB2010SGC033813, GSTIN: 03AAF5120Q1ZC

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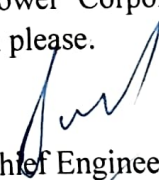
Memo No. 810

Dated. 17/9/24

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

Kindly refer to your Public Notice No. No. L-1/261/2021/CERC dated 31.07.2024 & Public Notice No. No L-1/261/2021/CERC dated 30.08.2024 , vide which comments/suggestions/objections of the stakeholders and interested persons on the subject cited draft regulations were invited.

In this regard, comments/ suggestions of Punjab State Power Corporation Ltd. (PSPCL) are enclosed for kind consideration of Hon'ble Commission please.


Chief Engineer/ PP&R,
PSPCL, Patiala

Comments of PSPCL on Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) (Third Amendment) Regulations, 2024.

Sr. No.	Regulations	Amendment Proposed in Draft Regulation	Suggestions/Comments
36	New Regulation 34A	<p>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.</p> <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.</p> <p>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</p>	<p>It is proposed that operating charges for Advance T-GNA and Exigency T-GNA should not be levied. With advancements in technology, much of the scheduling process is automated, making the removal of operating charges was a justified step in the past. Therefore, we recommend continuing this policy and not imposing new charges.</p>



Comments of PSPCL on Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) (Third Amendment) Regulations, 2024.

Sr. No.	Regulations	Amendment Proposed in Draft Regulation	Suggestions/Comments
29	Amendment to Regulation 23 of the Principal Regulations	<p>and entity-wise segregation of payable operating charges under T-GNA for collective transactions.</p> <p>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.”</p>	<p>In addition, we suggest that the web portal shall include real-time data on the available margin in the ATC limit for each region (e.g., N3 for Punjab). This would assist entities in making timely decisions regarding their remaining arrangements.</p> <p>Furthermore, we propose a revision to the current practice of charging ISTS fees upfront for Exigency T-GNA applications. Presently, if an application is only partially approved due to transmission constraints, the excess charges are refunded later, affecting liquidity and increasing administrative tasks. Instead, we recommend that NRLDC may block the required funds from the wallet at the time of application for applied, but deduct charges based on the final approved quantum.</p>


CE/ PP&R,
PSPCL, Patiala