

Ref: PXIL/S&R/30082024/1

30th August 2024

To,
The Secretary
Central Electricity Regulatory Commission
3rd Floor, Chanderlok Building
36 Janpath
New Delhi – 110 001

Ref: - Public notice reference No. L-1/261/2021/CERC dated 31.07.2024 inviting stakeholders to submit their comments/ suggestions / objections to draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Third Amendment) Regulations, 2024.

Sub: PXIL Comments on draft GNA Regulations (3rd amendment)

Dear Sir,

This is in reference to Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Third Amendment) Regulations, 2024 issued on 31st July 2024 (herein, referred as 'draft regulations').

PXIL submits clause wise observations to amendments proposed in draft regulations.

1. 35. Amendment to Regulation 26.2 of the Principal Regulations:

'35.1.A proviso shall be added under Regulation 26.2 of the Principal Regulations as under:

"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."

PXIL response / observations:

It is submitted that Regulation 26 prescribes entities that are eligible to apply for Temporary General Network Access ('T-GNA') to inter-State transmission system ('ISTS'). Clause (ii) of Regulation 26.1 (a) prescribes 'bulk consumer' directly connected to ISTS eligible to apply for T-GNA to ISTS.

The draft regulation proposes to restrict T-GNA quantum for bulk consumers to 30% of the GNA granted, this restriction would constrain their ability to meet short term power requirement through different Contracts operating on power exchange. **It is suggested that 30% restriction should be removed to enable bulk consumer to optimally utilise different Contract available on power exchange platform to meet short term power purchases.**

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2. New Regulation 34A

'36.1.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. 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 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.'

PXIL response / observations:

It is submitted that introduction of Regulation 34A providing for levy of operating charges at the rate of Rs 1,000/ day or part of the day for bilateral transactions or collective transactions will result in increase in transaction cost of power purchase, hence proposed new Regulation 34 A should not be introduced.

We humbly request Hon'ble Commission to take above submission on record and grant us an opportunity to present them to the Commission and its staff.

Thanking You,

Yours faithfully
For **Power Exchange India Limited**

Anil V. Kale
Vice President and Head – Strategy and Regulatory

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