



To,

GETCO SLDC/GNAT 4248

Date: 14/08/2024.

The Secretary,

Central Electricity Regulatory Commission

6th, 7th & 8th Floors, Tower B, World Trade Centre,

Nauroji Nagar, New Delhi- 110029

**Subject:** Comment on Draft Regulation on Connectivity and General Network Access to the Inter-State System (Third Amendment) regulation 2024.

Respected Sir,

Hon'ble Central Electricity Regulatory Commission has published the draft regulation on Connectivity and General Network Access to the Inter-State System (Third Amendment) regulation 2024 and comments/ suggestions/ objections from the stakeholders and interested persons.

In this regards, SLDC Gujarat is hereby submitting the following comments in the draft regulations. Further, SLDC Gujarat is explaining the issues for applicability of various regulations to the intra-State beneficiaries (DISCOMs) under GNA regulations 2022 and amendments.

The comments on the draft regulations are as under;

**SLDC Gujarat Comment on 8.1. Regulation 5.6 of the Principal Regulations shall be substituted as under:**

**"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(ii) & (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:

Provided that where an Applicant is seeking Connectivity at the terminal bay or switchyard of an entity covered under Regulation **17.1(ii) & (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, RLDCs **and SLDCs.**"

#### **CHAPTER 4 General Network Access (GNA)**

##### **Regulation 17.** Eligibility for GNA

##### **SLDC Gujarat Comment: Following shall be add 17.1 (iii)**

(iii) A distribution licensee or a Bulk consumer, seeking to connect to ISTS, directly **"or already having connectivity to ISTS"**, with a load of 50 MW and above;

##### **Regulation 34. Transmission charges for T-GNA**

##### **"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 .....

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.

##### **SLDC Gujarat Comment: Following new Regulation 34A.3 shall be add:**

**34A.3.** State Load Despatch Centre operating charges (SLDC operating Charges) for Advance T-GNA or Exigency T-GNA under bilateral transactions shall include the fees for scheduling, system operation, collection and disbursement of charges in respect of T-GNA transactions for inter-State transmission of electricity.

Provided that the operating charges collected by State Load despatch centre for T-GNA transaction shall be in addition to fees and charges, specified by the respective State Commission under sub-section (3) of Section 32 of the Act;

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Provided further that the SLDC Operating charges as may be decided by the commission in accordance with this regulation shall be applicable to the T-GNA applicants, only if operating charges have not notified by the respective State Commission.

Further, SLDC Gujarat is facing certain difficulties in the implementation of GNA Regulations notified by Hon'ble CERC and requires clarification on a few aspects. The matter of facts / case study are as under:

1. CTU has granted additional connectivity for 647.5MW to M/s Torrent Power Ltd(TPL) for its 3 x 382.5MW Sugan CCPP and such 3 nos of units were commissioned during year 2009 as per the Hon'ble CERC prevailing connectivity regulations 2004/2009. In accordance with the Hon'ble CERC prevailing connectivity regulations 2004/2009, Sugan CCPP granted connectivity to 500MW.
2. CTU has grant 250MW GNA to Torrent Power Ltd, Sugan CCPP under regulation 37.6(1) and regulation 17.2 of GNA regulations 2022 presently interconnected with ISTS at 400kV through 400kV Sugan TPS – Pirana(TPL) – Pirana(PG) and LILO of 400kV Gandhar – Vapi line at Sugan TPS.
3. CTU has grant 382.5MW GNA to Torrent Power Ltd, Uno Sugan CCPP) under regulation 37.6(1) and regulation 17.2 of GNA regulations 2022 presently interconnected with ISTS at 400kV through 400kV Sugan TPS – Pirana(TPL) at Uno Sugan TPS.
4. CTU has grant 800MW GNA to Torrent Power Ltd, Ahmedabad Distribution licensee under regulation 37.6(1) and regulation 17.2 of GNA regulations 2022.
5. Application by Torrent Power Ltd- Surat, Distribution licensee seeking to connect ISTS and grant of GNA / GNARE to entities other than STU under Regulation 20.1, 20.3 and 20.4 to entities under regulation 17.1(ii), (iii), (v) and (vi) of GNA regulations 2022.
  - The above application is under deliberation with CTU.
6. Deemed GNA Allocation: As per the CERC Connectivity and GNA Regulations, 2022, the SLDC of Gujarat has segregated the deemed GNA among various intra-state entities based on existing Long-Term Open Access (LTOA) and Medium-Term Open Access (MTOA) agreements.
  - Deemed GNA quantum is consider for MPSEZ (MUL) for 31.89MW.
  - MUL has explicitly informed the STU of its non-requirement for GNA through the STU, opting not to accept the deemed GNA.

## Case Study A

### **The detail part of the concerns are elaborated for grant of GNA to State Distribution Licensees;**

- SLDC Gujarat has face difficulties to schedule the power to intra State Distribution licensees for the granted GNA of 800 MW TPL Ahmedabad (TAECO), 160 MW of TPL Surat (TSECO).
- SLDC Gujarat had made various interaction (Video conference) to resolve the issues as above difficulties with RLDC, NLDC, CTU, M/s Torrent Power Ltd and STU-GETCO.

### **Background:**

#### **1. GNA Allocations:**

- As per the communication from GETCO – STU of Gujarat dated 26th September 2023, TAECO and TSECO DISCOMs were granted deemed GNA of 44.64 MW each from CTU.
- CTU, via letter no. CTU/E/GNA-INT-2B/2200000017 dated 29.09.2023, furnished details of 800 MW GNA granted to TAECO.
- Further details of 500 MW GNA granted to Sugem generator and 382.5 MW to Unosugen generator were provided by CTU through various letters dated 22.09.2023 and 27.09.2023.

#### **2. GNA Summary:**

- **Sugem Generator:** 500 MW + additional 687.5MW
- **Unosugen Generator:** 382.5 MW
- **TAECO DISCOM:** 44.64 MW through STU and 800 MW direct from CTU
- **TSECO DISCOM:** 44.64 MW through STU and seeking connect to & GNA to ISTS for 160 MW at Bhatar through ISTS separated from InSTS network.

#### **3. Existing Connectivity:**

- The connectivity from Sugem and Unosugen to TAECO DISCOM is through dedicated lines of Torrent Power, a status that remains unchanged post-GNA regulation.

### **Key Concerns and Request for Clarification:**

#### **1. Scheduling Methodology of TAECO**

- TAECO DISCOM, in its email dated 14.10.2023 to SLDC Gujarat, requested a change in the scheduling method and transmission charges. The request emphasizes that since TPL-Ahmedabad has direct connectivity with ISTS and 800 MW GNA, the schedule for TPL Ahmedabad from Sugem should fall under GNA. Consequently, ISTS (PoC) losses should be applied, and STU charges and losses should

*TSM*

not be applied to interstate power purchases (whether bilateral or through power exchanges) up to the 800 MW GNA limit.

- SLDC Gujarat, WRLDC is unable to do schedule of power of 800 MW from Sugan and Unosugen to TAECO without the separation of the identified 800 MW load.

## 2. Scheduling Methodology of TSECo

- It was discussed that post-disconnection, power scheduling should adhere to Regulation 43(4) of the IEGC Regulations, 2023, as TPL's 160MW load at Bhatar would be exclusively connected to Navsari(New) (ISTS) S/s.
- Regulation 43(4) of the IEGC Regulations, 2023: The entities connected exclusively to the inter-State transmission system shall be under the control area jurisdiction of RLDCs for scheduling and despatch of electricity for such entities.
- Control area for Bhatar-TSECo 160 MW will be shifted to WRLDC.
- Still it is pending due to reach a consensus on scheduling, emergency power drawl, and the requirement of STU NOC.

## 3. Application of Transmission Charges:

- Clarification is sought on whether the existing scheduling methodology for TAECO, which does not currently apply STU charges and losses for power from Sugan and Unosugen, should be revised under the new GNA regulations.
- Specifically, guidance is requested on how the GNA framework should treat entities like TAECO, which have a mix of dedicated connectivity to ISTS and STU networks, ensuring that double application of losses or charges is avoided.

## Recommendation:

It is requested to incorporate the appropriate provisions under GNA regulations on:

- Define the Control Area jurisdiction (RLDC / SLDC)
- If the control area jurisdiction with SLDC than Modalities for Scheduling and energy accounting (DSM, RTA, RTDA, Reactive bills) i.e. modalities of metering & applicability of STU charges and losses. Relevant provisions / regulations of the Hon'ble CERC and Hon'ble GERC shall be applicable and implement accordingly.
- If control area jurisdiction with RLDC than relevant provisions of the DSM regulations, PoC Regulations and IEGC notified by Hon'ble CERC shall be applicable and Torrent Power Ltd should be physically disconnect from STU

- network. Accordingly, Modalities for Scheduling and energy accounting (DSM, RTA, RTDA, Reactive bills) shall be define by RLDC in-consultation with SLDC.
- Procedure or guideline specifying for Dual connectivity of ISTS and STU, i.e. TAECO and TSECO,
  - To prevent any ambiguity or unintended financial implications to applicant as well as other state beneficiaries or DICs.

## **Case Study B**

### **Treatment for Deemed GNA allocation to MUPL**

SLDC Gujarat would like to bring to your attention an issue arising from the deemed GNA allocations as per the CERC Connectivity and GNA Regulations, 2022, and its implications on intra-state entities in Gujarat as under:

#### **Background:**

- **Deemed GNA Allocation:** As per the CERC Connectivity and GNA Regulations, 2022, the SLDC of Gujarat has segregated the deemed GNA as per the regulation 18.1(e) among various intra-state entities based on existing Long-Term Open Access (LTOA) and Medium-Term Open Access (MTOA) agreements prevails.
- **STU Communication:** The State Transmission Utility (STU) has subsequently communicated the deemed GNA and additional GNA allocations to these entities in accordance with their LTOA/MTOA standings.

#### **Issue:**

- **MUL's Stance:** MUL has explicitly informed the STU of its non-requirement for GNA through the STU, opting not to accept the deemed GNA. Despite this, the deemed GNA was allocated to MUL, and WRLDC has since been raising Fees and Charges bills to MUL based on this allocation.
- **Billing Dispute:** MUL has refused to pay the WRLDC Fees and Charges, arguing that it did not accept the deemed GNA allocation and has no requirement for GNA through the STU.
- **STU's Request to CTU:** STU communicated with the CTU, requesting reconsideration of the GNA capacity allocated to MUL and GUVNL, but there has been no reconsideration from the CTU.
- **Request from WRLDC:** With the billing dispute unresolved, WRLDC has now requested the SLDC to intervene and resolve the issue.

#### **Request for Clarification and Resolution:**

1. **Reconsideration of Deemed GNA Allocations:** It is essential to address the concerns of entities like MUL, which have explicitly communicated their

non-requirement of GNA through the STU. The allocation of deemed GNA without consideration of such representations has led to unnecessary financial disputes.

2. **Clear Guidelines on Billing and Fees:** Clear guidelines should be established on how RLDC should proceed with billing when an entity has denied the deemed GNA allocation. This would prevent any disputes and ensure that only the entities that have accepted GNA allocations are billed accordingly.
3. **Resolution Mechanism:** A formal resolution mechanism should be outlined within the GNA regulations for addressing such disputes between intra-state entities, STU, CTU, and RLDC. This will help in resolving issues swiftly and avoiding prolonged financial disagreements.

In accordance with regulations, 41 and 42 of the GNA regulation 2022 notified by Hon'ble CERC, empowered to remove difficulties and may provide relax to the GNA implementation issues. The regulations 41 and 42 is reproduced as under;

**"41. Power to Relax**

*The Central Commission, for reasons to be recorded in writing, may relax any of the provisions of these regulations on its own motion or on an application made before it by an affected party to remove the hardship arising out of the operation of these regulations".*

**"42. Power to Remove Difficulty**

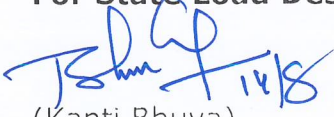
*If any difficulty arises in giving effect to the provisions of these regulations, the Central Commission may, on its own motion or on an application made before it by affected party by order, make such provision not inconsistent with the provisions of the Act or provisions of other regulations specified by the Central Commission, as may appear to be necessary for removing the difficulty in giving effect to the objectives of these regulations".*

Since, the GNA regulation is made effective with its all aspects from 01.10.2023 and the subsequent implementations of the various regulations i.e. Regulation 17, Regulation 18.1(e), Regulation 37.6 under GNA regulations 2022 are needs to explain before Hon'ble CERC for the State concerns and smooth implementations of the GNA regulations 2022 and subsequent amendments.

Hon'ble Central Electricity Regulatory Commission is requested to consider the comments and the concerns / case study explain above submitted by SLDC Gujarat.

With regards,  
Thanking you,

**For State Load Despatch Centre**



(Kanti Bhuvra)  
Chief Engineer  
Gujarat