

**From:** "MEMBER SECRETARY" <[mssrpc-ka@nic.in](mailto:mssrpc-ka@nic.in)>

**To:** "Harpreet Singh Pruthi" <[secy@cercind.gov.in](mailto:secy@cercind.gov.in)>, "Shilpa Agarwal" <[shilpa@cercind.gov.in](mailto:shilpa@cercind.gov.in)>

**Cc:** "Superintending Engineer" <[secommisrpc-ka@nic.in](mailto:secommisrpc-ka@nic.in)>

**Sent:** Thursday, August 29, 2024 3:40:31 PM

**Subject:** SRPC secretariat comments on 3rd Amendment to GNA Regulations

महोदय /Sir

महोदया / Madam

Please find attached SRPC secretariat comments on 3rd Amendment to GNA/Connectivity Regulations.

भवदीय /Regards

सदस्य सचिव/MS, SRPC

**SRPC secretariat comments on CERC(Connectivity and GNA to the ISTS)  
(Third Amendment) Regulations, 2024**

<b>Regulation/Page No</b>	<b>As in Draft</b>	<b>Suggestion</b>	<b>Reason/comment</b>
4.4/Page 4	Grant of Connectivity to REGS seeking to get connected to transmission network of Bhakra Beas Management Board (BBMB)	Grant of Connectivity to REGS seeking to get connected to transmission network of Bhakra Beas Management Board (BBMB)/Damodar Valley Corporation (DVC)	Better to be generic as Regulation cannot be amended again and again. Any other such ISTS can also be included.
4.4.1/Page 4	A REGS with installed capacity 5 MW and above, either individually or collectively through a lead generator, owned and operated by BBMB, and located in BBMB area may seek Connectivity to the ISTS network of the BBMB, including a substation or transmission line or switchyard of a generating station of BBMB, by making an application to the Nodal agency, along with system study conducted by BBMB SLDC for such an entity.	A REGS with installed capacity 5 MW and above, either individually or collectively through a lead generator, owned and operated by BBMB/DVC, and located in BBMB/DVC area may seek Connectivity to the ISTS network of the BBMB/DVC, including a substation or transmission line or switchyard of a generating station of BBMB, by making an application to the Nodal agency, along with system study conducted by BBMB/DVC SLDC for such an entity. The scheduling and accounting will be mutually discussed by BBMP/DVC and respective RLDC/PC.	Better to be generic as Regulation cannot be amended again and again. There may be many combinations of RE power being injected into ISTS and it might be sold to PX, self consumed, bundled, flexibility scheme therefore scheduling and accounting needs to be finalised by BBMP/DVC with RLDC/PC
4.4.1/Page 4	A REGS with installed capacity of less than 5 MW,	A REGS with installed capacity of less than 5 MW,	There may be many combinations of RE power being injected

	<p>owned and operated by BBMB, may seek Connectivity to the ISTS network of BBMB, including a substation or transmission line or the switchyard of a generating station of BBMB, by applying to BBMB SLDC for such connectivity and after approval of BBMB SLDC, may get connected to the network of BBMB. The approval of SLDC shall be forwarded to the Nodal Agency for records. There shall be no separate scheduling and accounting for such entities by RLDC. However, RLDC may add such entities to the schedule of the existing generating station of BBMB, to which such REGS of capacity less than 5 MW is connected.”</p>	<p>owned and operated by BBMB/DVC, may seek Connectivity to the ISTS network of BBMB/DVC, including a substation or transmission line or the switchyard of a generating station of BBMB/DVC, by applying to BBMB/DVC SLDC for such connectivity and after approval of BBMB/DVC SLDC, may get connected to the network of BBMB/DVC. The approval of SLDC shall be forwarded to the Nodal Agency for records. There shall be no separate scheduling and accounting for such entities by RLDC. However, RLDC may add such entities to the schedule and of the existing generating station of BBMB/DVC, to which such REGS of capacity less than 5 MW is connected.”  <b>The scheduling and accounting will be mutually discussed by BBMP/DVC and respective RLDC/ RPC.</b></p>	<p>into ISTS and it might be self consumed, bundled, flexibility scheme therefore scheduling and accounting needs to be finalised by BBMP/DVC with RLDC/SLDC</p>
<p>New Proviso in Regulation 5.1/Page5</p>	<p>Provided also that an REGS making an application based on LOA or PPA under</p>	<p>Provided also that an REGS making an application based on LOA or PPA under</p>	<p>As connectivity equal to LOA or PPA and IC can be more than</p>

	<p>Regulation 5.8(xi) may apply for a grant of Connectivity for a quantum equal to the quantum of LOA or PPA, which may be less than the installed capacity</p>	<p>Regulation 5.8(xi) may apply for a grant of Connectivity for a quantum equal to the quantum of LOA or PPA, which may be less than the installed capacity.  <b>Provided AVC will be restricted to the connectivity and same is applicable to Regulation 5.2.</b></p>	<p>connectivity. In such cases AVC will be ambiguously declared by the REGS and Deviations would be effectively less. Suitable clause may be inserted to allow AVC declaration only up to the connectivity.</p>
<p>New Proviso in Regulation 23.3/Page No. 18</p>	<p><b>23.3</b> 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><b>23.3</b> 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.  <b>CTUIL shall make available to RPCs the Connectivity/GNA details for all entities.</b></p>	<p>issue RTDA based on the connectivity/ GNA quantum of regional entities. Implementing agency is providing monthly the details of drawl GNA grantees but no information regarding GNA/Connectivity of Injecting entities is being received from CTUIL. To avoid any discrepancies in the accounts the same shall be made available to RPCs.</p>