CENTRAL ELECTRICITY REGULATORY COMMISSION
NEW DELHI

Petition No. 132/MP/2024 along with IA.No.95/2024

Coram:
Shri Jishnu Barua, Chairperson
Shri Ramesh Babu V., Member
Shri Harish Dudani, Member

Date of Order 17.03.2025

In the matter of:

Petition under Section 79 of the Electricity Act, 2003, read with Section 38 and Regulations 4.1 and 5.6 of the General Network Access Regulations, 2022, thereby imploring this Hon'ble Commission to exercise its regulatory powers for the purpose of facilitating the Petitioner to obtain connectivity of its Wind and Solar hybrid power plant of 254.5 MW to the ISTS/CTU network at the nearest receiving sub-station located at Petitioner's oil refinery located at 50 KMs from the project site, i.e., Moti Khavadi, Jamnagar, Gujarat.

And

In the matter of:

Reliance Industries Limited, ……Petitioner
PO Motikhavadi, Meghpar, Padana Gagva,
Jamnagar, Gujarat-361140

Versus

1. Central Transmission Utility of India Limited
   Suadamini, Plot No.2, Sector-29, Near IFFCO Chowk Metro Station
   Gurugram, Haryana-122001

2. Western Region Load Dispatch Centre (WRLDC)
   MIDC Area, Marol, Andheri East,
   Mumbai – 4000093

3. Chhattisgarh State Power Transmission Company Ltd. (CSPTCL)
   P.O. Sunder Nagar, Danganiya, Raipur,
   Chhattisgarh- 492013

4. Chhattisgarh State Power Generation Company Ltd. (CSPGCL)

P.O. Sunder Nagar, Danganiya, Raipur,
Chhattisgarh- 492013

5. Chhattisgarh State Power Distribution Company Ltd. (CSPDCL)
P.O. Sunder Nagar, Danganiya, Raipur,
Chhattisgarh- 492013

6. Gujarat Power Corporation Limited,
Block No. 8, Sixth Floor, Udhyog Bhavan, Sector 11,
Gandhinagar – 382 011

7. Gujarat Energy Transmission Company Ltd. (GETCO)
9th floor, Sardar Patel Vidyut Bhawan, Race Course, Vadodara,
Gujarat- 390007

8. Dakshin Gujarat Vij Company Ltd. (Gujarat Discom)
" Urja Sadan ", Nana Varachha Road, Kapodara,
Surat, Gujarat-395006

9. Gujarat Urja Vikas Nigam Ltd,
Sardar Patel Vidyut Bhawan, Race Course,
Vadodara: 390007

10. Madhya Pradesh Power Transmission Co. Ltd.
Shakti Bhavan, Rampur, Jabalpur
Madhya Pradesh- 482008

11. Madhya Pradesh Power Generation Company Ltd.
Shakti Bhavan, Viduyt Nagar, Rampur, Jabalpur,
Madhya Pradesh- 482008

12. Madhya Pradesh Poorva Kshetra Vidyut Vitran Company Ltd.
Block No.-7, Shakti Bhavan, PO: Vidyut Nagar, Rampur
Jabalpur - 482008 (M.P)

13. Maharashtra State Electricity Transmission Company Ltd.
Prakashganga, Plot No.C-19, E-Block, Bandra Kurla Complex, Bandra (East),
Mumbai – 400051

14. Maharashtra State Power Generation Company Ltd.
Prakashgad, 2nd Floor, Plot No G-9, Bandra (East),
Mumbai: 400051

15. Maharashtra State Electricity Distribution Company Ltd.
Prakashgad, 6th Floor, Plot No G-9, Bandra (East),
Mumbai: 400051

16. Electricity Department Goa.
Vidyut Bhawan, 3rd floor,
Panaji – Goa: 403001.

17. Dadra And Nagar Haveli And Daman and Diu

Power Distribution Corporation Limited,
Vidyut Bhavan, Near 66 kV Sub-Station, Kachigam,
Daman 396215

18. Powergrid Corporation of India Ltd
"Saudamini", Plot No.2, Sector – 29, Near Iffco Chowk,
Gurgaon- 122001 (Haryana).

19. TATA Power Company Limited,
Bombay House, 24 omi Modi Street,
Mumbai 400001

20. Ratnagiri Gas & Power Pvt.Ltd,
Jubilee Tower, 5th Floor, B35-B36, Sector -1,
Noida. 201301(U.P)

21. NHDC Ltd.,
NHDC Parisar, Shyamala Hills,
Bhopal – 462013(M.P.)

22. Torrent Power Ltd.,
Sugen Mega Power Project, Off National Highway No.8,
Taluka Kamrej, Surat – 394155 (Gujarat).

23. Adani Power (Mundra) Ltd,
1st Floor, South Wing, Adani Corporate House, Shantigram, S.G. Highway,
Ahmedabad – 382421(Gujarat).

24. M/s. JSW Energy Ltd
4th Floor, NTH Complex, A-2, Shaheed Jeet Singh Marg, Qutab Institutional Area,
New Delhi – 110016.

25. Jindal Power Limited
P.O. Tamnar, District: Raigarh,
Chhattisgarh – 496107.

26. Coastal Gujarat Power Ltd
4000 UMPP, At & Post: Tunda, Mundra,
Kutch, Gujarat-370435

27. Rattan India Power Ltd
Plot No.D2 & D2, Part Additional Industrial Area,
Nandgaonpeth, Amravati

28. D.B. Power Ltd.
Village : Badadhra, Block & Tehsil : Dabhra, Dist : Janjgir, Champa,
Chhattisgarh- 495695.

29. Adani Power Ltd
1st Floor, South Wing, Adani Corporate House, Shantigram, S.G. Highway,
Ahmedabad – 384421

30. KSK Mahanadi Power Co.Ltd
Akaltara (Nariyara) TPP, Bilaspur,
Chhattisgarh – 495552.

31. MB Power (Madhya Pradesh) Ltd
239, Okhla Industrial Estate, Phase III, New Delhi -110020

32. Sasan UMPP, Sasan Power Ltd.
Vill: Siddikhurd, P.O. Tiyra, Sasan, Waidhan, Singroli,
Madhya Pradesh – 486886.

33. R.K.M. Powergen Pvt. Ltd.,
No.14, Dr. Giriappa Road, T. Nagar,
Chennai 600017

34. Bhopal Dhule Transmission Company Ltd. (BDTCL)
101, Windsor, CST Road, Santacruz East,
Mumbai 400098

35. Paschim Gujarat Vij Company Limited (PGVCL)
Corp. Office, Rajkot, Gujarat

…. Respondents

Parties Present:

Shri Hemant Singh, Advocate, RIL
Ms. Supriya Rastogi, Advocate, RIL
Ms. Lavanya Panwar, Advocate, RIL
Ms. Srishti Khindaria, Advocate, GUVNL & PGVCL
Ms. Surbhi Kapoor, Advocate, GUVNL & PGVCL
Ms. Suparna Srivastava, Advocate, CTUIL
Ms. Divya Sharma, Advocate, CTUIL
Shri Lashit Sharma, CTUIL
Shri Gajednra Sinh, WRLDC
Shri Alok Mishra, WRLDC

ORDER

Reliance Industry Limited (RIL) has filed the instant Petition under Section 79 of the Electricity Act, 2003, read with Section 38 and Regulations 4.1 and 5.6 of the Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2022 (hereinafter referred as “the GNA Regulations”), with the following prayers:

i. Issue appropriate directions upon the Central Transmission Utility of India Limited/ Respondent No. 1, to take steps for providing connectivity to the RE Project of the

Petitioner at ISTS receiving sub-station located at Jamnagar Facility of the Petitioner, in terms stated in the present petition;

ii. *Pass any order and/or any such orders as this Hon'ble Commission may deem fit and proper under the facts and circumstances of the present case and in the interest of justice.*

Prayer in IA.No.95/2024

i. *Allow the present application*

ii. *Take the additional documents being letter dated 11.10.2024 and Daily Order dated 07.10.2024 passed in Petition No. 246/MP/2024, annexed as Annexure A and Annexure B, respectively, in the present application, on record; and*

iii. *Pass such other further order(s) as this Hon'ble Commission deem fit and proper in the facts circumstances of the present case*

Submissions of Petitioner

2. Petitioner has made the following submissions:

(a) In terms of the Order dated 05.01.2022 in Petition No. 124/MP/2021, CTUIL has granted connectivity of 500 MW as Bulk Consumer for Petitioner's Jamnagar Facility, pursuant to which a dedicated transmission line is being constructed by PGCIL from the Petitioner's Jamnagar Facility to Jam Khambhaliya ISTS substation and connecting bays at Jam Khambhaliya sub- station. Petitioner has submitted that, vide an application dated 22.07.2022, it applied for additional connectivity of 700 MW to the ISTS, effective from 30.06.2023, as a Bulk consumer. CTUIL, vide its letter dated 28.11.2022, granted the connectivity to the Petitioner subject to the terms of the aforesaid order dated 05.01.2022. Further, the Petitioner also applied for LTA vide application dated 29.12.2022, which was granted vide letters dated 17.03.2023 by CTUIL.

(b) Post the effectiveness of the GNA Regulations on 05.04.2023, Petitioner, vide letters dated 03.05.2023, requested for conversion of the LTA of 500 MW and 300 MW to GNA, which was granted by CTUIL vide its letter dated 22.09.2023. As such, as on date, RIL has an existing GNA of 800 MW, 500 MW starting from 01.10.2024, and 300 MW starting from 01.03.2026.

(c) Petitioner is in the process of setting up a 254.5 MW Wind-Solar Hybrid Project ("RE Project") in Jam Jodhpur in Jamnagar District in Gujarat. The power generated from this project will mainly be consumed by RIL's Jamnagar Facility, located ~50 kms from

the RE Project site. However, there will be some excess generation during the initial phases of operation of the aforesaid project, which the Petitioner intends to sell to third parties utilizing the ISTS, by connecting the said RE project to the receiving sub-station of the Petitioner at its Jamnagar Facility, which, in turn, is connected to the ISTS Jam Khambhaliya pooling station.

(d) Vide letter dated 19.10.2023 Petitioner had approached the CTUIL to get connectivity for its RE Project at Jamnagar facility (Bulk Consumer); however, no response has been received.

(e) Petitioner, through this Petition, is approaching this Commission seeking a direction to CTUIL to take steps for granting connectivity to ISTS receiving Substation at Jamnagar facility for its RE Project.

Hearing on 19.04.2024

3. Petition was admitted on 19.04.2024.

Hearing on 08.05.2024

4. The Commission directed the Petitioner to implead Western Region beneficiaries as parties to the Petition and file a revised memo of parties.

Submissions of Respondent

5. CTUIL vide affidavit dated 09.05.2024 has mainly submitted as under:

a) Petitioner, vide its application dated 28.10.2023, applied for connectivity to ISTS for its hybrid/RE project under Regulation 5.6 of the GNA Regulations. Regulation 5.6 provides for the sharing of a terminal bay at the ISTS sub-station or switchyard of a generating station having connectivity to the ISTS or the dedicated transmission line connecting the generating station of the already existing connectivity grantee to the ISTS sub-station; however, there is no provision enabling such sharing amongst injecting and drawee entities. The application of the Petitioner was discussed in the 23rd Consultation Meeting for Evolving Transmission Schemes in the Western Region held on 29.11.2023 wherein, after informing regulatory reservations, the Petitioner

was requested to present a schematic diagram of the bulk consumer and hybrid project and their proposed inter-connection details so that aspect such as scheduling/metering could be deliberated.

b) A meeting was held on 14.12.2023 between the CEA, CTUIL, Grid India, GETCO, and the Petitioner, wherein Grid India highlighted certain issues that are required to be addressed while considering the proposal for grant of connectivity to the Petitioner's hybrid RE project at the Jam Khambhaliya ISTS sub-station with the dedicated 400 kV D/c line to 400/220 kV Jamnagar GIS of the Petitioner. CTUIL stated in the above meeting that all parties had agreed that the proposed sharing arrangement would lead to optimal utilization of transmission infrastructure; however, the issues as highlighted by Grid India were required to be addressed.

c) CTUIL, vide letter dated 24.1.2024 to this Commission, sought suitable directions for processing the case of the Petitioner for sharing of the terminal bay of an ISTS sub-station/switchyard/line connecting to ISTS amongst injecting and drawee entities considering that there was no enabling provision in the GNA Regulations for the same.

d) In the aforesaid circumstances, this Commission may be pleased to issue such Orders/practice directions as may enable CTUIL to process the applications for connectivity by sharing of terminal bay of an ISTS sub-station/switchyard/line connecting to ISTS amongst injecting and drawing utilities as is also being sought by the Petitioner in the present Petition.

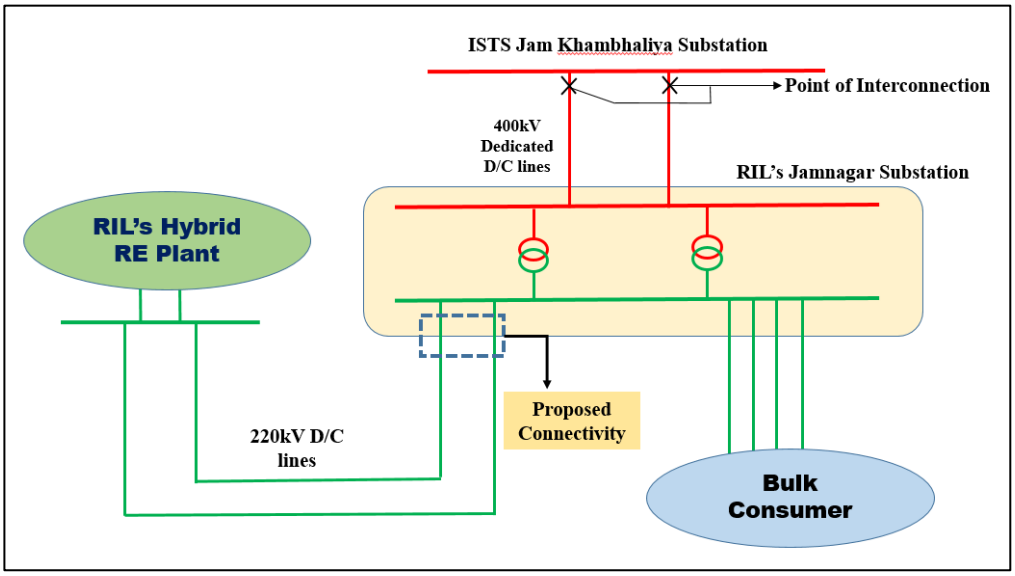
Submissions of Petitioner

6. Petitioner vide reply dated 10.05.2024 filed "Amended Memo of Parties," impleading Western Region beneficiaries as a party to the Petition.

Submissions of Respondent

7. WRLDC vide affidavit dated 17.05.2024 has mainly submitted as under:

a) The Petitioner proposes to connect the above-mentioned RE Project to the receiving sub-station of RIL's Jamnagar Facility, which, in turn, is connected to the ISTS Jam Khambhaliya pooling station (where GNA has been granted to Bulk Consumer). The schematic diagram of the proposed connectivity is given below:



b) Western Regional Load Despatch Centre (WRLDC) submitted the following point-wise issues for the kind consideration of the Commission:

A. Control Area for Scheduling, Accounting, and Deviation Settlement

i. For the Regional Entities, the Control Areas are segregated by placement of Interface Meters at ISTS Point of Interconnections (PoIs) only. Further, the scheduling, energy accounting, and monitoring of the Control Area are also to be done at the PoIs level only.

ii. In the instant case, the PoI as per connectivity granted by CTUIL is 400 kV Jam Khambhaliya Bus, where the Petitioner had been granted 800 MW GNA as a "Bulk Consumer" through dedicated 2x400 kV Jam Khambhaliya to Jamnagar (RIL) lines. As per the request by the Petitioner, the Petitioner intends to connect a "Renewable Hybrid Generating Station" at 220 kV RIL's Jamnagar substation, which, in turn, is connected to the same 400 kV Jam-Khambhaliya Bus (PoI). Hence, two different Regional Entities are falling under a single Control Area. Due to these, scheduling, metering, energy accounting, and monitoring of actual interchange in real time for two separate Regional Entities fall under the same PoI.

iii. If the request of the Petitioner is to be facilitated, then there will be a requirement to create two separate "Control Areas" and to facilitate the same, PoI has to be shifted behind the 400 kV Jam-Khambhaliya ISTS Bus to a location inside the switchyard of the 220 kV Jamnagar owned by Petitioner, RIL. Therefore, the metering jurisdiction of RLDC would be extended to an internal system owned by RIL and this will be a deviation from the extant Regulations.

B. Pooling and De-pooling of energy interchanges

i. As per Regulation IV.6 of the CEA Connectivity Standards, in the present ISTS PoI, i.e. 400 kV Jam Khambhaliya ISTS, it is not possible to allow a "Bulk Consumer" as well as a "Renewable Hybrid Generating Station" as a single control area Regional entity. Further, IEGC Regulations 2023 does not have any such provisions that facilitate the segregating of energy interchanged by a "Bulk Consumer" and "Renewable Hybrid Generating Station," which is connected at a single PoI.

ii. CERC (Deviation Settlement Mechanism and Related Matters) Regulations, 2022 have different provisions for a Buyer & Seller in the instant case, i.e., "Bulk Consumer" and "Renewable Hybrid Generating Station," respectively.

C. Compliance with CEA Standards

i. CEA Connectivity Standards for a "Renewable Hybrid Generating Station" and for a "Bulk Consumer" mandates that both the entities, "Bulk Consumer" and "Renewable Hybrid Generating Station," have to comply with the various regulatory requirements separately at Point of Interconnection (PoI) level, i.e., in the instant case 400 kV Jam-Khambhaliya Bus.

ii. Presently, there is no methodology to facilitate, verify, and monitor the compliance to these standards at the common PoI level in case the PoI is being shared by Bulk consumer & Renewable Hybrid Generating Station. It is also to be seen that around 254.5 MW of generation is sub-divided into five clusters, and generation in each cluster is being evacuated through 220 kV Double Circuit lines up to 220 kV Switching Station in Jamnagar. It is necessary to study the adequacy of Reactive Compensation and compliance with CEA standards at the PoI since the total EHV line length from the generating station to the PoI is more than 120 km.

iii. As per the discussions held during the 23rd Consultation Meeting for Evolving Transmission Schemes in Western Region on 29.11.2023, the Hybrid (Wind + Solar) RE plant of Reliance Industries Limited, [250 MW (Phase-1) and 1000 MW (Phase-2)], will be connected to 220 kV Jamnagar substation via 220 kV D/C lines only. It calls for reviewing of N-0 as 220 kV lines are not capable of carrying around 1250 MW. N-1 compliance also needs to be reviewed as in case of contingency (of one circuit outage), 1250 MW of generation may not be able to be evacuated

through other single 220 kV lines, and this may result in a sudden loss of the entire generation complex.

D. Commission order dated 29.01.2020 in Petition No. 299/MP/2018 in the matter of BALCO vs PGCIL & Others:

i. The Commission vide order dated 29.01.2020 in Petition No. 299/MP/2018 in the matter of BALCO vs PGCIL & Others had allowed to connect 250 MW of Captive Load of BALCO with the existing 400 kV BALCO - Dharamjayagarh D/C to which a BALCO generating station is already connected. The BALCO (Bulk Consumer) had been given this additional connectivity on the same ISTS interconnection by way of creating a new Bulk Consumer Control Area by shifting the ISTS interface point into the BALCO system.

Submissions of Petitioner

8. The Petitioner, vide affidavit dated 04.06.2024, has mainly submitted as under:

a) **Control Area for Scheduling, Accounting, and deviation settlement:** Petitioner proposes that the interface points shall remain at Jam Khambhaliya substation, and RIL may act in a role similar to that of a lead generator for energy scheduling, accounting, and deviation settlement. Accordingly, consolidated DSM charges will be allocated to connected entities by RIL (acting as lead). Therefore, RLDC will be scheduling at the Jam Khambhaliya interface point based on the consolidated schedule provided by all connected entities by the Petitioner. Furthermore, RIL (Lead) will have the responsibility of payment of DSM charges, GNA Charges, etc., for all connected entities (both Generator and Bulk Consumer). The proposed plan is in line with Indian Electricity Grid Code 2023, whereby similar arrangements are proposed where RE generators are connected at the same ISTS station using a single dedicated line. In the alternative, RLDC can schedule at Jam Khambhaliya bus and segregation can happen at the RIL substation. However, RLDC shall be responsible for segregation at the RIL substation at 220 kV. This is also in line with IEGC 2023 whereby similar arrangements are proposed where RE generators are connected at the same ISTS station using a single dedicated line. However, this may lead to a flow of power between RIL facilities without a schedule (internal flow of power) on which no charges or losses shall be applicable. Petitioner prefers Option 1.

b) **Pooling and De-pooling of energy interchanges:** Petitioner shall be responsible for providing a consolidated schedule to the Jam Khambhaliya Bus and netting off shall also happen at Jam Khambhaliya Bus. Furthermore, a deviation settlement mechanism may be applied based on the net schedule at Jam Khambhaliya Bus for import or export. If the net schedule is exported, then the deviation settlement mechanism will be applicable to the Generating entity, and if the net schedule is imported, then the deviation settlement mechanism will be applicable to the bulk consumer. In the alternative, all metering data at 220 KV level (at which various entities will get connected) will made be available to RLDC. Since segregation will be done by RLDC at 220 kV, RLDC will have requisite data of each entity, and accordingly, RLDC can levy deviation settlement mechanism charges.

c) **Compliance with CEA Technical Standards:** Respective entities (be it the consumer or generator) shall follow each of the Technical Standards and Regulations prescribed for them. For this purpose, the Petitioner shall demonstrate that for each entity (be it consumer or generator), these regulations can be performed independently of other entities. By this, Petitioner means that it shall diligently perform its obligations under the said regulations as a bulk consumer as if there was no generator and vice versa. The Petitioner shall be allowed to submit a study report of the same at the time of submission of CON – 4. In the alternative, the Petitioner shall conform to all common parameters (for a consumer and a generator) of the applicable Technical Standard Regulations at a stricter level. Further the Petitioner shall adhere to the specific technical standards for consumer or generator as per the extant Regulations.

d) **Compliance to N – 1 criterion for reliable grid operations:** Grid Controller has stated that since Phase – I (250 MW) and Phase – II (1000 MW) of RIL RHGS are planned to evacuate with 220 kV double circuit lines, the N-1 compliance in case of contingency (of one circuit outage), the 1250 MW of generation may not be able evacuate through other single 220 kV line which may result in sudden loss of entire generation complex. Under the present infrastructure, 250 MW of generation is divided into five clusters, and generation in each cluster is evacuated through 220 kV double circuit lines up to 220 kV switching substation in Jamnagar. Therefore, it is necessary to study the adequacy of reactive compensation and necessary compliance of CEA standards at POI as the line length is more than 150 KMs. As such, the applicant

(Petitioner) shall submit RMS and EMT study models and CEA connectivity compliance reports for carrying out a detailed simulation study.

Hearing on 05.06.2024

9. CEA was requested to convene a meeting with the participation of the Petitioner, CTUIL, GCIL, and other concerned stakeholders to resolve/propose solutions to the concerns raised by GCIL/ WRLDC.

Submissions of the Respondent GUVNL

10. The Respondent GUVNL vide affidavit dated 21.06.2024 has mainly submitted as under:

a) RIL has a GNA of 800 MW (500 MW effective 01.10.2024 from 01.03.2026), However, the source of power for 500/300 MW is not mentioned. Accordingly, the Commission is requested to direct RIL to furnish the source of power in respect of 500/300 MW of power.

b) Under the instant proposal, there will be power injected by RIL from the Jam Jodhpur generating station for onward conveyance to third parties/power exchanges, etc, as well as power drawn from the Jamkhambhaliya ISTS sub-station to the Jamnagar Facility, as a bulk consumer. Accordingly, the Jamkhambhaliya ISTS sub-station will be recording both the input power received through Jamkhambhaliya ISTS sub-station for consumption in the Jamnagar Facility and export power received from the Jam Jodhpur from the hybrid RE station, i.e., in two opposite directions. This would necessitate the CTU/PGCIL undertake appropriate and effective scheduling and despatch mechanisms including maintaining the record of power flow from different directions being handled at the Jamkhambhaliya ISTS sub-station, the meter reading and the summation of the same; the necessary details need to be provided to PGVCL, the distribution licensee in the area where the Jamnagar Facility is located.

c) It will be the obligation of Reliance Industries Limited:

   i. To ensure that the captive generating station(s) and captive use of electricity are maintained in respect of the different generating stations. The meter reading at the Jam Jodhpur RE Plant of power injected therefrom at the bus bar has to be coordinated and finalised by the CTU in order to have proper records of the quantum of generation at the Jam Jodhpur RE plant so that the quantum of

generation is known at real time basis, the quantum of energy consumed by RIL from such generating station is ascertainable and the balance quantum is to be considered as an export of power from the Jam Jodhpur RE plant, subject to adjustment of transmission losses up to the Jamkhambhaliya ISTS sub-station.

ii. The sources of renewable power at present are being identified as 500 MW/800 MW of renewable power being consumed by RIL as a consumer at its facility at Jamnagar and the 250 MW from the Jam Jodhpur RE plant. RIL should acknowledge and confirm that there are no other sources from which RIL is drawing power at the Jamnagar Facility (consumption unit) and

iii. There should be no mixing up of the generation and use of power from the generating station operating in isolation mode within the Jamnagar Facility with the power being conveyed through 400 kV line to the Jamkhambhaliya ISTS sub-station, in isolation mode and CTU/PGCIL shall ensure that such isolation is effected properly.

d) RIL should also give an undertaking for the above purposes and further that in case they do not comply with conditions of captive generation and captive use under the provisions of the Electricity Act, 2003 and the rules notified thereunder, they will be liable to pay the cross-subsidy surcharge, additional surcharge, etc, and they will be subject to all other consequences of the electricity not being captive generation and for captive use.

e) The Jamnagar Facility of RIL as well as the Jam Jodhpur RE Plant, are located in the area of Paschim Gujarat Vij Company Limited ('PGCVL'), which is the concerned licensee. However, it seems that the RIL has impleaded (wrongly) Dakshin Gujarat Vij Company Limited ('DGVCL') as Respondent No. 8, whereas PGVCL should be substituted as a party instead of DGVCL.

Submissions of Respondent PGVCL

11. Respondent PGVCL, vide affidavit dated 08.08.2024, made the same submissions as submitted by GUVNL vide affidavit dated 21.06.2024.

Submissions of CEA

12. CEA vide letter dated 09.08.2024 submitted the report of the deliberation held with the Petitioner Reliance Industries Ltd. (RIL) in the presence of Central Transmission Utility of India Limited (CTUIL) and Grid Controller of India Limited (GCIL)/Grid-India.

Hearing dated 13.08.2024

13. The Commission reserved the matter for order on 13.08.2024.

Submissions of the Petitioner

14. Petitioner vide Affidavit dated 21.08.2024 submitted the Minutes of the Meeting held at CEA on 01.07.2024 in accordance with the RoP of hearing dated 05.06.2024. Further, vide Written Submissions dated 23.08.2024, submitted that from the minutes of the meeting held between the parties, it is clear that the issue stands resolved and there is no further impediment in granting Petitioner's RE project connectivity at ISTS receiving sub-station at RIL's Jam Nagar Facility.

Submissions of the Respondents PGVCL and GUVNL

15. Respondents Paschim Gujarat Vij Company Limited (PGVCL) and Gujarat Urja Vikas Nigam Limited (GUVNL) vide their common written submissions dated 26.08.2024 have mainly submitted as below:

a) The issues of metering, scheduling, etc., in the above arrangement, i.e., where RIL is both consuming electricity and injecting electricity at the same sub-station, appear to have now been agreed to in the Minutes of the Meeting held on 01.07.2024 under the Chairmanship of the Chairperson of the CEA, along with RIL, GRID-India, CTUIL.

b) Respondent PGVCL is the distribution licensee is whose area the above facility is located. It is undisputed that RIL would be procuring the power from sources other than PGVCL, and therefore, RIL would be subject to the payment of cross subsidy surcharge, additional surcharge, etc., and other consequences, unless RIL discharges its obligation under Rule 3(2) of the Electricity Rules, 2005, that it satisfies the conditions of ownership and captive use to the extent specified therein.

c) It is essential for RIL to not only disclose all the sources of power (and demonstrate captive status if applicable) but also that the data for entire consumption and generation is made available. The Commission may ensure that the connectivity, metering arrangement, and energy accounting are in such a manner to ensure that

the accurate recording of the entire consumption by RIL from all sources is done and maintained and made available to PGVCL and GUVNL.

d) The Commission, while deciding the issues of metering, grid stability, scheduling, despatch, etc, may also direct the following:

i. In respect of the 800 MW of power (renewable or otherwise), RIL will be liable to pay cross subsidy surcharge, additional surcharge etc., to PGVCL, the licensee in whose area of supply the Jamnagar facility is located (unless there is captive use/consumption). Further they would be subject to all other consequences of the electricity not being captive generation and for captive use.

ii. RIL should acknowledge and intimate the sources of drawal of power by RIL at its facility. At present, the sources of renewable power as at present is being identified as 800 MW of renewable power to be consumed by RIL as a consumer at its facility at Jamnagar and 254.5 MW from the Jam Jodhpur RE plant. RIL should acknowledge and confirm that there are no other sources from which RIL is drawing power at the Jamnagar Facility (consumption unit).

iii. The real time data of power consumed as consumer and power generated must be shared separately with GUVNL/PGVCL, and it should be ensured that the data is without any consideration of netting off so that the entire consumption data is available with PGVCL and GUVNL.

IA.No.95/2024

16. After the Order was reserved on 13.08.2024, the Petitioner has filed IA No. 95/2024 to place additional documents being Petitioner's letter dated 11.10.2024 to CTUIL and RoP of hearing dated 07.10.2024 passed in Petition No. 246/MP/2024, on record in the present Petition and to apprise this Commission of the subsequent events which have occurred pursuant to RoP of hearing dated 13.08.2024. Petitioner, vide the instant IA No. 95/2024, has mainly submitted the following:

a) On 14.08.2024, the Applicant submitted the necessary land documents to CTUIL. This land was allotted to the Applicant under Gujarat Government policy viz. "Allocation policy of Government waste land for Wind /solar /wind - solar hybrid Park." Under the said policy, a lease agreement can be executed by a RE Solar Park Developer, which is the project developer, and further, the developer can self-consume the power produced by it.

b) CTUIL, vide a letter dated 05.09.2024, informed the Applicant that since the GNA Application dated 21.10.2023 was made as a captive power plant, the land documents submitted by the Applicant cannot be considered valid. This constrained the Applicant to withdraw the Connectivity application dated 21.10.2023. Accordingly, the Applicant vide letter dated 11.10.2024, informed CTUIL that it is withdrawing Connectivity Application dated 21.10.2023 and requested CTUIL to cancel the said application.

c) In view of the occurrence of the above-stated events, the aforesaid documents are required to be placed before this Commission for proper adjudication of the present petition, and no likely prejudice is to be caused to the Respondents if the prayer for permission to file additional documents is allowed.

d) Further, by way of the present application, no new issues or claims that are being raised.

e) The Applicant herein filed another petition viz.,Petition No. 246/MP/2024, before this Commission under Section 79 read with Section 38 of the Electricity Act 2003 and Regulations 4.1, 5.6, and 17.1(iii) of the GNA Regulations seeking directions from this Commission to exercise its regulatory powers for the purpose of facilitating the Applicant to obtain GNA for the Applicant's Petrochemicals Plant located at Dahej, Gujarat at the DGEN Switchyard and DGEN dedicated Transmission Line of M/s. Torrent Power Ltd. Petition No. 246/MP/2024 was listed on 7.10.2024 before the Commission. During the course of the hearing, it was submitted that the present petition was reserved for Order vide RoP of hearing dated 13.08.2024. In view of the similar issues being raised in both the Petitions, Petition No. 246/MP/2024 be tagged with the present. Accordingly, this Commission vide RoP of hearing dated 07.10.2024 issued notice in Petition No. 246/MP/2024 and further granted liberty to the Petitioner to mention Petition No. 246/MP/2024 in the event that the decision of the present petition comes to be decided prior to the next date of hearing in Petition No. 246/MP/2024.

f) The issues raised in both the Petitions are critical for the smooth/ effective operations of the Applicant business. The applicant further states that it plans to file a fresh application for the connectivity to connect its Renewable Hybrid Generating Station (RE Project) to RIL's receiving substation located at Jamnagar Facility.

Hearing dated 07.01.2025

17. The Commission heard IA No. 95/2024 in Petition No. 132/MP/2024 on 07.01.2025 and reserved the IA for order along with the main matter.

Analysis and Decision

18. We have considered the submissions of the Petitioner and Respondents and perused them with the facts available on record.

19. Petitioner RIL has an existing GNA of 800 MW as a Bulk Consumer with Connectivity at Jam Khambaliya ISTS substation. The Petitioner, vide the instant petition, is seeking connectivity of its RHGS of 254.5 MW at the Jam Jodhpur sub-station of the Petitioner, which is connected as a bulk consumer with the ISTS/CTU network.

20. Respondent CTU has sought directions to enable such Connectivity. Respondent WRLDC has raised issues on scheduling, accounting, and compliance with CEA standards when a Bulk consumer and a generating station are connected at the same ISTS Point of Interconnection.

21. Respondents PGVCL and GUVNL have submitted that connectivity, metering arrangement, and energy accounting should be in such a manner to ensure that the accurate recording of the entire consumption by RIL from all sources is done and maintained and made available to PGVCL and GUVNL and has sought directions in respect of the 800 MW of bulk consumer facility of RIL to be liable to pay cross-subsidy surcharge, additional surcharge, etc. to PGVCL, the licensee in whose area of supply the Jamnagar facility is located (unless there is captive use/consumption).

22. We have considered the submissions of Respondents PGVCL and GUVNL. We do not find the submissions of PGVCL and GUVNL seeking cross-subsidy charges for bulk consumer facilities relevant under the instant Petition since the instant case was seeking connectivity of the RHGS.

23. As per the RoP of hearing dated 05.06.2024, CEA held a meeting with Petitioner, CTUIL, and Grid-India, vide its letter dated 09.08.2024, submitted its Report on the issue. The relevant extract of the CEA's Report dated 09.08.2024 is as under:

"2. The matter has since been deliberated by Chairperson, CEA, with the Petitioner Reliance Industries Ltd. (RIL) in the presence of the concerned stakeholders Central Transmission Utility of India Limited (CTUIL) and Grid Controller of India Limited (GCIL)/Grid-India. After the detailed deliberations and based on the submissions made by GRID-India, CTUIL and RIL, the following decisions were taken which was agreed by all:

(i) RIL shall be the nodal entity for all coordination activities with CTUIL and WRLDC/NLDC for ensuring compliance to various Standards and Regulations of CEA and CERC and

procedures made thereunder. RIL shall also ensure sharing of the requisite information with CEA, CTUIL and Grid-India for studies/analysis.

(ii) As per the facts of the case, it stands to logic that RIL as a regional entity shall be treated as a "Bulk Consumer" for all commercial purpose of scheduling and deviation accounting. The status of RIL shall not change from "Bulk Consumer" to "Generator" at any point of time.

(iii) The 400 kV bus at Jam Khambhaliya ISTS Pooling Station shall be the interface point/Point of Interconnection (Pol) for metering and energy accounting. The scheduling and commercial settlements shall be done at Pol on a net basis.

(iv) RIL shall ensure compliance to the Central Electricity Authority ((Technical Standards for Connectivity to Grid) Regulation, 2007 and subsequent amendments, as applicable to 'Bulk Consumer and Renewable Hybrid Generating Station (RHGS). The compliances shall be verified and monitored for 'Bulk Consumer and RHGS independently at Pol.

(v) The metering scheme as proposed by RIL (attached at Annexure I) is considered to be in order. The real time visibility of both RHGS & Bulk consumer shall be made available to WRLDC for monitoring of generation and consumption data. The necessary SCADA data shall be made available to WRLDC by RIL as per the extant regulations.

(vi) Phasor Measurement Units (PMUs) shall be installed as per Central Electricity Authority (Technical Standards for Construction of Electrical Plants and Electric Lines) Regulations, and PMU data shall be reported to WRLDC. The dynamic compensation device shall have PMUs installed on its bus with visibility at WRLDC.

(vii) CTUIL shall modify the connectivity to recognize both 'Bulk Consumer and Renewable Hybrid Generating Station (RHGS) in the instant case, with specified maximum quantum of injection and drawal at Pol. The Connection Agreement shall be construed accordingly."

As per above, compliance to CEA Standards, metering, and scheduling modalities were deliberated among CTU, CEA. and WRLDC, and there was agreement among the entities to allow such connection.

24. However, we note from the Petitioner's submission vide IA No. 95/2024 that the Connectivity application for the RHGS seeking Connectivity by way of instant Petition has been withdrawn by the Petitioner, and Petitioner has submitted that it may make such an application separately.

25. Since the Connectivity application has been withdrawn by the Petitioner, therefore, in our considered view, the instant Petition has become infructuous. Accordingly we are not inclined to issue any directions in respect of the prayers under the instant Petition.

26. Accordingly, Petition No.132/MP/2024 along with IA. No. 95/2024 is disposed of in terms of the above.

Sd/	Sd/	Sd/
(Harish Dudani)	**(Ramesh Babu V.)**	**(Jishnu Barua)**
Member	**Member**	**Chairperson**