No.02-02/2419  

To,  
The Secretary,  
Central Electricity Regulatory Commission,  
4th Floor, Chandralok Building,  
36 Janpath, New Delhi – 110001.  

Fax No. 011-23753923  

Raipur, Dt: 01-3-18  

Subject - Comments on Draft CERC (Grant of Connectivity and General Network Access to the inter-state transmission system and other related matters) Regulations, 2017.

Comments on Draft CERC (Grant of Connectivity and General Network Access to the inter-state transmission system and other related matters) Regulations, 2017 are as under –

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| 1      | **Clause 7.39. Connectivity by a Captive Generating Plant** | Connectivity by a Captive Generating Plant (CGP) may have surplus capacity which it may intend to sell on long term or medium term or short term basis or it may seek to evacuate power from CGP to captive user by using ISTS. A Captive Generating Plant (CGP) shall apply for Connectivity for a quantum of maximum exportable capacity proposed to be connected to ISTS.  

Connectivity to a Captive Generating Plant (located in the Licensee's area) with ISTS may be granted provided the authority for determination of "Captive Status" of the Plant is vested with the agency designated by the State Commission.

Further, minimum captive load for which connectivity to ISTS could be given should also be specified, given that connectivity for a Consumer has been specified as 250 MW and also that minimum Exportable Capacity (that includes captive load as well as surplus power for sale) for CGP is also 250 MW.
16.5. GNA by a Captive Generating Plant

(a) In case of captive power plants (CPP) with co-located captive load, the CGP shall have option to take Injection GNA corresponding to Installed Capacity less normative Auxiliary Power Consumption less the captive load estimated by the CPP for the co-located captive plant.

(b) Where CGP is not located at the same place as captive load, the CGP may take Injection GNA corresponding to the captive load to be met and for any surplus power.

(c) The captive user of CGP may seek drawal GNA if it intends to draw power through long or medium or short term agreement through ISTS through connection point of CGP and in such cases, it shall be subject to the charges as may be imposed by the respective State Commission. The scheduling segregation among power sold by CGP and power purchased by captive user shall be done by concerned RLDC /SLDC as the case may be.

If the captive load of the CGP is distant located then it should take both injection GNA, at injection point and drawal GNA at drawal point. Similarly, a Co-located captive load may also draw power from Grid in case of failure of its CGP in supplying power. Hence Co located CGP should also take injection GNA for exportable generation and drawal GNA for co-located Captive load.

If a CGP fails to maintain its Captive Status (consumption of 51% of its total generation at the end of the year) then it shall be liable for payment of Cross Subsidy Charges to the distribution licensee of the area as determined by the State Commission.

It is requested that while finalizing the draft Regulations, the comments offered by CSPDCL as above be incorporated at appropriate place.

Chief Engineer (RA & PM)
CSPDCL, RAIPUR