BEFORE THE CENTRAL ELECTRICITY REGULATORY COMMISSION, NEW DELHI

IN THE MATTER OF:

NTPC Vidyut Vyapar Nigam Ltd. ..... Applicant

Comments on Draft Central Electricity Regulatory Commission (Grant of Connectivity and General Network Access to the inter-state transmission system and other matters) Regulations, 2017
No. L-1/229/2017/CERC Dated: 14th November, 2018

It is humbly submitted that:

Explanatory Memorandum
2.13 Availing Network Services for Transfer of Power under various Terms of PPA

Comments/Suggestion:
1. In the proposed regulation the generators who have taken GNA and submit the long term PPAs to CTU, the long term PPAs will be allocated corridor on pro rata basis.

But as per current regulation - part allocation of Long term Access application is not allowed. Only Medium term and short term open Access applications are part allocated depending on the corridor availability.

By following the above proposed method of allocation of corridor, the short term and medium transactions will not get the transmission corridor and will be adversely affected. As this is the only source of corridor for short term and medium transactions.

This short term market as per market monitoring report of CERC 2016 -17 is 33.51 BUs. This market is showing a declining trend and will further decline because of above proposed method of corridor allocation.

Therefore, it is suggested 5% corridor may be reserved for short term and medium term transactions also, in similar lines, as is being proposed for power exchange in the new regulation.

2. Long Term PPAs are considered as PPAs of more than 7 years. Medium term PPAs are from one year to 5 Years. Due to gap of two years between medium term and long term PPAs, one has to apply twice for a PPA of duration more than 5 years and up to seven years. Therefore, it is suggested that Medium term PPA should be allowed up to seven years.

3. If a generator is having a Power Sale agreement with trader and trader in turn is having Power Purchase Agreement with Buyer, then it is suggested that generator may be
allowed to apply for GNA if he submits both the above documents along with the GNA application

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