

907/2018/CRU-CERC



West Bengal State Electricity Transmission Company Ltd.

(A West Bengal Government Enterprise)
CIN : U40101WB2007SGC113474

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Ref. No. : CE/CPD/CERC/2017

Date : 17/01/2018

To
The Secretary,
Central Electricity Regulatory Commission,
3rd & 4th Floor, Chanderlok Building, 36 Janpath,
New Delhi - 110 001
Fax No.: 011- 23753920


Sub. : Draft Central Electricity Regulatory Commission (Grant of Connectivity and General Network Access to the inter-State transmission system and other related matters) Regulations, 2017

Sir,

In connection with the draft GNA Regulation, I am directed to submit the following views of WBSETCL as mentioned at Annexure - A for kind consideration.

Enclo : Annexure - A

Yours faithfully,



(A Karmakar)

Chief Engineer : CPD

Views of WBSETCL on draft GNA Regulation

1. The introduction of General Network Access (GNA) mechanism in Inter-State Transmission System was contemplated for transmission system development and hassle free access to the transmission system by the Generators.

The STU is developing intra-State transmission system to ensure development of an efficient, coordinated and economical system of intra-State transmission lines for smooth flow of electricity from a generating station to the load centers in terms of the Electricity Act 2003. Now, eligibility of Distribution Licensee to apply for direct connectivity with inter-State transmission system, as proposed in draft GNA Regulation, may hamper development of efficient, coordinated and economical system of intra-State transmission lines.

Further, Distribution Licensee connected with ISTS through intra-State transmission system can apply for GNA, if necessary, through STU in terms of the clause 2.1.d (ii) "State Transmission Utility on behalf of intra-state entities who intend to seek GNA through STU (distribution licensee, consumers, embedded generator etc.)"

In view of above, WBSETCL being STU of the State of West Bengal, submitted for kind consideration towards deletion of the clause **2.1 c (v) "Distribution Licensee who intends to avail supply for a minimum load of 250 MW from the inter-State transmission system"** of the draft GNA Regulation

2. Regarding Clause No. 5.3 it may be mentioned that indication of quantum of GNA sought at interconnection point of STU with ISTS could not be practicable for integrated grid operation. As such, it is suggested to modify the clause as STU shall indicate total quantum of GNA for ISTS.
3. Clause No. 7.26 would invite complexity in regard to system control operation and settlement of energy account etc. since in the integrated system injection/drawal could be controlled as per GNA quantum. WBSETCL suggested GNA connectivity of Distribution Licensee to ISTS through STU and for others either ISTS or STU. The clause shall be modified accordingly.
4. Clause No. 11.2 might invite conflict between CERC Regulation and State Regulation. It is proposed modification of the clause to the extent of that any intra-State entity desirous of availing GNA to ISTS may apply GNA application to CTU through STU.
5. Clause No. 33 shall be modified to the extent of "Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) Regulations, 2014 and its amendment from time to time"


 (ASIT KARMAKAR)
 Chief Engineer
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