WIND INDEPENDENT POWER PRODUCERS ASSOCIATION

Shri Harpreet Singh Pruthi 20th September 2022
Secretary
Central Electricity Regulatory Commission
3rd & 4th Floor, Chanderlok Building,
36, Janpath, New Delhi-110001

Subject: - Comments/Suggestions on Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022 and Supplementary Draft Notification.

Dear Sir,

We, the Wind Independent Power Producers Association (WIPPA), is a registered national-level body having the association of more than 30 Independent Power Producers (IPPs) having capacity of around 12,000 MW with an asset base of more than Rs. 60,000 Crores and a healthy pipeline in the wind energy sector in India through policy advocacy and presenting independent views/suggestions/comments/analysis to various stakeholders at various forums to provide a fillip to the sector.

This is with reference to the notice inviting suggestions/comments on Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022 dated 11th June 2022 and Supplementary Draft notification dated 18th August 2022. We are submitting our comments as **Annexure-I** and **Annexure-II** for your reference.

We request Hon'ble CERC to kindly consider our comments/suggestions while finalizing the Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022 and the Supplementary Draft.

Yours's Sincerely
For **Wind Independent Power Producers Association**

Parag Sharma
President
Email: president@wippaindia.in

Enclosed: - Annexure-I & Annexure-II

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ANNEXURE-I

WIPPA Comments on Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022

S No.	Regulation No.	Existing/ Proposed Amendment	Recommended / New Provision	Justification & Suggestion
1.	2(1) (j)	'Designated ISTS Customer' or 'DIC' means the user of any transmission element(s) of the Inter-State Transmission System (ISTS) and shall include generating station, State Transmission Utility (STU), distribution licensee including State Electricity Board or its successor company, Electricity Department of State and any other entity directly connected to the ISTS and shall include an intra-State entity or a trading licensee that has obtained Medium Term Open Access or Long Term Access to ISTS	'Designated ISTS Customer' or 'DIC' means the user of any transmission element(s) of the Inter-State Transmission System (ISTS) and shall include generating station with or without storage , Standalone ESS State Transmission Utility (STU), distribution licensee including State Electricity Board or its successor company, Electricity Department of State and any other entity directly connected to the ISTS and shall include an intra-State entity or a trading licensee that has obtained GNA ~~Medium Term Open Access or Long Term Access to ISTS~~	Standalone ESS has to be included in the definition of Designated ISTS Customer (DIC), as Standalone storage is utilizing the transmission element of ISTS. Medium Term Open Access or Long-Term Access to ISTS to be replace with GNA
2.	3. (3)	Bills for transmission Charges shall be raised on the buyer in terms of this clause notwithstanding any provisions in the PPA and the settlement of the transmission charges inter se between the buyer and the generating station or the seller, wherever necessary, shall be made in terms of the PPA or as per the mutual agreement.	Bills for transmission Charges shall be raised on the buyer in terms of this clause notwithstanding any provisions in the PPA and the settlement of the transmission charges inter se between the buyer and the generating station or the seller, wherever necessary, shall be made in terms of the PPA or as per the mutual agreement. Provided that the renewable energy generated by projects covered as per MOP order dated vide reference number 23/12/2016-R&R dated 13th	MoP through its order has provided benefit of waiver of Interstate transmission charges to all the renewable energy projects till 30th June 2025 including SECI tender for manufacturing linked capacity scheme, Open access projects, green hydrogen, BESS etc. The latest order dated 23th Nov, 2021 and 30th Nov, 2021 included phasing out of the charges in the subsequent years post 30th June 2025 until 30th June 2028.

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			February, 2018 and other subsequent orders or any other order issued by competent authority granting exemption from payment of transmission charges and / or losses shall not attract any additional transmission charges and losses under Connectivity and GNA Regulations, 2022 on account of uses of such renewable power.	The provision in the draft in the current form does not consider ISTS transmission charges and losses waiver provided by the MoP for the generated renewable energy. Further, by allowing both buyer and seller to mutually decide on the transmission charges as per PPA, this will open lot of projects for discussion/litigations where parties would like to renegotiate the PPA tariff.
3.	3(4)	Sharing of transmission charges for DICs shall be based on the technical and commercial information provided by the DICs, inter-State transmission licensees, NLDC, RLDCs, SLDCs and CTU to the Implementing Agency.	Sharing of transmission charges for drawee DICs shall be based on the technical and commercial information provided by the DICs, inter-State transmission licensees, NLDC, RLDCs, SLDCs and CTU to the Implementing Agency.	Transmission charges are to be shared by Drawee DICs only. DICs to be replaced with Drawee DICs wherever applicable.
4.	5(4)	The Yearly Transmission Charges for the National Component shall be shared by all the drawee DICs in proportion to their quantum of GNA.	Following proviso shall be added. 5.(4) The Yearly Transmission Charges for the National Component shall be shared by all the drawee DICs in proportion to their quantum of GNA. Provided further that no Yearly Transmission Charge shall be paid by a drawee entity availing inter-state open access from solar, wind, Hydro PSP and BESS Projects to be commissioned up to 30th June, 2025. The Yearly Transmission Charge corresponding to the quantum drawn by such drawee entity availing inter-state open	The Ministry of Power's order no 23/12/2016-R&R dated 23rd Nov 2021 provides u/s 3.1.(i) waver of ISTS charges to solar and wind energy generation for self-consumed or sold to any entity either through competitive bidding, Power Exchange or through bilateral agreement. All the latter transactions involve open access in ISTS network. The relevant section is as below: *"3.1 For the solar, wind, Hydro PSP and BESS Projects commissioned upto 30.06.2025, the waver of inter-state transmission charges shall be applicable for the following:*

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			access shall be part of the National Component to be shared by all the drawee DICs.	*(i) Solar or wind energy generation set up by any person/entity. The power generated from such sources can be self-consumed or sold to any entity either through competitive bidding, Power Exchange or through bilateral agreement."* Under the GNA regulation, as the principle is to apply GNA charges on the drawee entity and in order to give effect to above order of MOP, it is suggested that Yearly Transmission Charge (YTC) applicable on open access consumers be made part of National Component of YTC to be shared by all drawee DICs.
5.	7(1)	Transformer Component for a State shall comprise of Yearly Transmission Charges for inter-connecting transformers (ICTs) planned for drawal of power by the concerned State. A list of such transformers for each State shall be provided by the Central Transmission Utility to the Implementing Agency.	Transformer Component for a State shall comprise of Yearly Transmission Charges for inter-connecting transformers (ICTs) along with their associated bays and downstream bays planned for drawal of power by the concerned State. A list of such transformers and bays for each State shall be provided by the Central Transmission Utility to the Implementing Agency.	The list should comprise of ICTs and associated bays for determination of the transformer component.
6.	11(1)	Short Term Open Access Rate (in paise/kWh) shall be published for each billing month by the Implementing Agency which shall be calculated State-wise as under: Transmission charges of the State for the billing month (in rupees) / (7200 X the quantum, in	T-GNA Rate (in Rs./MW/block) ~~Short Term Open Access Rate (in paise/kWh)~~ shall be published for each billing month by the Implementing Agency which shall be calculated State-wise as under:	Under the 2020 Sharing Regulations, the Short-Term Charges were equivalent to the long term charges converted to paise/kWh. Amendments propose T-GNA charges to be 110% of GNA charges for the State. T-GNA would be granted on existing margins, and it is a substitute product for Short Term Access. It is

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		MW, of Long-Term Access plus Medium-Term Open Access of the State for the corresponding billing period)	Transmission charges for GNA for entities located in the State, for the billing month, under first bill (in rupees) X 1 ~~1.10~~/ (number of days in a month X 96 X GNA quantum in MW, ~~of Long-Term Access plus Medium-Term Open Access~~ for all such entities located in the State considered for billing, for the corresponding billing period.)	suggested that the charges for T-GNA be retained equivalent to State's GNA charges.
7.	11 (2)	Transmission charges for T-GNA shall be payable by drawee embedded entities located in the State, as per the last published T-GNA Rate for the State, along with other charges or fees as per GNA Regulations and the Transmission Deviation charges, if any, as per these regulations		Whether REGS taking T-GNA during non-generation hours would be treated as embedded entities located in the state? Kindly clarify.
8.	12(2)	Transmission Deviation Rate in Rs./MW, for a State or any other DIC located in the State, for a time block during a billing month shall be computed as under: 1.05 X (transmission charges of the State for the billing month in Rs.)/ (quantum in MW of Long-Term Access plus Medium-Term Open Access of the State for the corresponding billing period X 2880)	Transmission Deviation Rate in Rs./MW, for a State or any other DIC located in the State, for a time block during a billing month shall be computed as under: 1.05X (transmission charges for GNA of entities located in the State, under first bill for the billing month in Rs.)/ (GNA quantum in MW ~~of Long-Term Access plus Medium-Term Open Access~~ of such entities located in the State, considered for billing, for the corresponding billing period X number of days in a month X 96~~2880~~)	The transmission deviation rate in the proposed draft regulation is 1.35 times transmission charge for GNA entities. This should be reverted back to 1.05 times as is the case now. A sudden increase of multiplier to 1.35 from 1.05 is a very high 30% hike and onerous to the DICs. The intent of the transmission deviation rate is to ensure DICs draw (or inject) within their GNA quantum (or connectivity quantum) through a penal mechanism, which needs to be reasonable
9.	13 (1&2)	**12. Amendment to Regulation 13 of the Principal Regulations:**	It is proposed to retain the provision of principal Regulation 13 (1) and (2) and the waiver of ISTS	We, in Sr no 2 above, have requested for 'no transmission charges for wind and solar projects commissioned till June 2025'. The present

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		(1) Clauses (1) and (2) of Regulation 13 of the Principal Regulations shall be deleted.	charges shall be continued for the RE generators which have already entered into PPA with the Buyers. Hence the following is requested to be retained in the regulations: **13. Treatment of transmission charges and losses in specific cases** *<u>(1) No transmission charges and losses for the use of ISTS shall be payable for:</u>* -------- *(c) generation based on solar or wind power resources, for a period of 25 years from the date of commercial operation, fulfilling the following conditions:* *(i) Such generation capacity has been awarded through competitive bidding process in accordance with the guidelines issued by the Central Government; and* *(ii) Such generation capacity has been declared under commercial operation during the period from 13.2.2018 to 31.12.2025~~2~~ and* *(iii) Power Purchase Agreement(s) have been executed for sale of such generation capacity to all entities including Distribution Companies*	suggestion below is independent of the above request and to be considered only in case such waiver is not granted. Amendment to the Regulation 13 of principal Regulation proposes to delete the Clauses (1) and (2) of Regulations 13. The Regulation 13 of Principal Regulation is specifically for treatment of transmission charges and losses in specific cases wherein this Regulations allows waiver of ISTS charges for 25 years under specific conditions and period. It is to be submitted that, while bidding under competitive bids invited by the State Discoms or SECI or Indian Railways, RE generators have considered the waiver of ISTS charges provided by Regulation 13 of principal Regulations. Considering such waiver as allowed by the Regulations, RE generators were able to offer attractive bids. However, with the proposed amendment to Regulation 13, the waiver of transmission charges will not be available for RE generators (even for the cases where bids have been concluded). Further, in such cases if the proposed amendment to clause (3) of Regulation 3 will be

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			for compliance of their renewable purchase obligations.	made applicable, the payment of ISTS charges shall be as per the PPA terms. It is to be noted that, currently, some of the PPAs executed by RE generators with Discoms under competitive bidding framework has provision of paying transmission charges by generator and power shall be delivered at State periphery. In such cases if the PPA clause has provision of delivering the power at State Periphery, the RE generators shall be obligated to pay the ISTS charges and it will not be recoverable from the buyer. **In view of the above, the proposed amendment to the Regulations shall take away the long-term benefits provided by the Hon'ble Commission's Regulations and put commercial burden on the RE generators with ISTS charges, which RE generators have not factored while offering the Tariff to the Discoms under competitive bidding.**
10.	13 (3)	**Clause (3) of Regulation 13 of the Principal Regulations shall be substituted as under:** Where COD of a generating station or unit(s) thereof is delayed and the Associated Transmission System has achieved COD, which is not earlier than its SCOD, the generating station shall pay Yearly Transmission Charges	Where COD of a Connectivity Grantee ~~generating station or unit(s) thereof~~ is delayed from start date of Connectivity in terms of GNA Regulations, and the Associated Transmission System has achieved COD, which is not earlier than such start date of Connectivity ~~its SCOD~~, the ~~generating station~~ Connectivity Grantee shall pay Yearly Transmission Charges for the	Ministry of Power's has vide its direction (dated 15th January 2021) issued under Section 107 of EA'2003 has stated as follows: *"Provided also that where a Renewable Energy generation capacity which is eligible for ISTS waiver in terms of the extant orders, is granted extension in COD by the competent authority,*

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		for the Associated Transmission System corresponding to Long Term Access granted for the generating station or unit(s) thereof, which have not achieved COD: Provided that Yearly Transmission Charges in respect of Associated Transmission System shall be included for determination of transmission charges of DICs in accordance with Regulations 5 to 8 of these regulations upon the generating station or unit(s) thereof achieving COD.	Associated Transmission System corresponding to Connectivity capacity ~~Long Term Access granted for the generating station or unit(s) thereof~~, which have not achieved COD: Provided that where the COD of the Connectivity Grantee is extended by the competent authority, the start date of Connectivity in terms of the GNA Regulations would be aligned to and commence from the extended COD of the Connectivity Grantee. The Connectivity Grantee shall pay the Yearly Transmission Charges for the Associated Transmission System corresponding to Connectivity capacity, which has not achieved the extended COD.	*the commencement and the period of LTA shall also get extended accordingly, and it will be deemed that the period of ISTS waiver is extended by the said period."* It is suggested that the start date of connectivity be extended and aligned with the extended SCOD of the RE project and transmission charges levied only if the commissioning of the RE project is delayed beyond the extended SCOD.
11.	13 (7)	Where Connectivity is granted to a Connectivity grantee on existing margins and COD of such Grantee is delayed, the Connectivity grantee shall, corresponding to the capacity that is delayed, pay transmission charges from the start date of such Connectivity at the rate of Rs. 3000 /MW/month: Provided that the amount so received in a billing month, shall be reimbursed to the DICs in proportion to their share in the first bill in the following billing month.	Where Connectivity is granted to a Connectivity grantee on existing margins and COD of such Grantee is delayed, the Connectivity grantee shall, corresponding to the capacity that is delayed, pay transmission charges from the start date of such Connectivity at the rate of Rs. 3000 /MW/month: Provided that the amount so received in a billing month, shall be reimbursed to the DICs in proportion to their share in the first bill in the following billing month.	This provision should not be applicable in case the CoD of the Connectivity Grantee being a renewable energy generating station is extended by the competent authority. If the delay is approved, the revised date of COD shall be considered as revised SCOD and no transmission charges shall be payable by the RE generators. The proviso needs to be added to protect such RE generators which may not be able to achieve SCOD on account of various reasons which may be beyond their control and have also been

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			Provided further that if the COD of a Connectivity Grantee being a renewable energy generating station is extended by the competent authority or the Renewable Energy Implementing Agency, no transmission charges shall be required to be paid by the renewable energy generating station till such period of extension granted.	recognized by competent authority to grant extension in SCOD.
12.	13 (8)	In case a generating station or unit(s) thereof has achieved COD and the Associated Transmission System is delayed, the concerned inter-State transmission licensee(s) shall make alternate arrangement at its own cost for despatch of power of the generating station or unit(s) thereof in consultation with the Central Transmission Utility: Provided that till such alternate arrangement is made, the inter-State transmission licensee(s) shall pay to the generating station, the Yearly Transmission Charge corresponding to the quantum of Connectivity for the period for which the transmission system has got delayed.	Request you to amend the clause as below: In case a generating station or unit(s) thereof has achieved COD and the Associated Transmission System is delayed, the concerned inter-State transmission licensee(s) shall make alternate arrangement at its own cost for despatch of power of the generating station or unit(s) thereof in consultation with the Central Transmission Utility: Provided that till such alternate arrangement is made, the inter-State transmission licensee(s) shall pay to the generating station, ~~the Yearly Transmission Charge~~ the generation losses as per PPA tariff corresponding to the quantum of Connectivity for the period for which the transmission system has got delayed.	Compensating generating stations for commissioning project while the Associated Transmission System is delayed with the Yearly Transmission Charges will not compensate them fully against the loss which generators will incur. The compensation should be linked to the generation losses of the project to safeguard generator's interest. We request Commission to either compensate generator for the generation losses at PPA tariff or allow generator to commission project with in 90 days from ATS COD without levying any penalty on the generators.

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13.	13(9) b	paid by the generating company whose generating station or unit(s) thereof is delayed, till the generating station or unit thereof, achieves COD, or	paid by the generating company whose generating station or unit(s) thereof is delayed, till the generating station or unit thereof, achieves COD, or till the extended SCOD granted by competent authority, or	It is suggested that the SCOD is aligned with the extensions as provided by competent authorities for projects under sections 62 or 63. REGS should not be penalized or burdened with charges SCOD is extended on legitimate grounds.
14	13 (10)	Regional entity Generating stations (a) drawing start-up power or (b) drawing power during shutdown after COD or (c) for REGS drawing power during non-generation hours or (d) injecting infirm power, through ISTS, shall pay transmission charges for injection or drawl beyond its T-GNA, at the rate of Transmission Deviation Rate for the State in which they are located: Provided that the amount so received in a billing month, shall be reimbursed to the DICs in proportion to their share in the first bill in the following billing month.	Regional entity Generating stations (a) drawing start-up power or (b) drawing power during shutdown after COD or (c) for REGS drawing power during non-generation hours or (d) injecting infirm power, through ISTS, shall pay transmission charges for injection or drawl beyond its GNA plus T-GNA quantum, at the rate of Transmission Deviation Rate for the State in which they are located: Provided that the amount so received in a billing month, shall be reimbursed to the DICs in proportion to their share in the first bill in the following billing month.	Grant of GNA/Connectivity to a generating plant implies that an adequate ISTS network is already developed to cater the requirements of the grantee. In such scenario, requirement of taking additional T-GNA by the plant for drawal of Start-up / Aux power and for injection of Infirm power is not justified. Further the entire cost of such network is already being paid by end users. From generators perspective also, such kind of drawl / injection of power is a necessity. Generators would also eventually pass on the additional cost of taking such T-GNA in the tariffs and hence recovered from the end user. It therefore suggested that in such cases where net drawl/injection of power by a generating station is within GNA, there will not be any requirement of taking T-GNA.

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				However, in case net drawl / injection is more than GNA, generating plant would be require to take T-GNA for the quantum exceeding GNA. Also for the quantum of drawl/injection exceeding T-GNA, Generating stations shall pay transmission charges at the rate of Transmission Deviation Rate for the State in which they are located.
15	19	**19. Letter of Credit and other instruments of Payment Security Mechanism** (1) The Central Transmission Utility shall, at least 3 (three) months prior to the effective date of GNA, in respect of a DIC, give a notice to such DIC, indicating the date of operationalization of such Long Term Access or Medium Term Open Access and requiring the DIC to furnish an irrevocable, unconditional and revolving Letter of Credit through a scheduled bank or any other acceptable instrument of payment security mechanism in favour of the Central Transmission Utility. Not later than 1 (one) month prior to the date of operationalization of Long Term Access or Medium Term Open Access, the DIC shall open such Letter of Credit or provide such acceptable instrument of payment security mechanism that shall be operative from a date prior to the Due Date of its first bill.	**19. Letter of Credit and other instruments of Payment Security Mechanism** (1) The Central Transmission Utility shall, at least 3 (three) months prior to the effective date of GNA, in respect of a drawee DIC, give a notice to such drawee DIC, indicating the date of operationalization of such GNA ~~Long Term Access or Medium Term Open Access~~ and requiring the drawee DIC to furnish an irrevocable, unconditional and revolving Letter of Credit through a scheduled bank or any other acceptable instrument of payment security mechanism in favour of the Central Transmission Utility. Not later than 1 (one) month prior to the date of operationalization of ~~Long Term Access or Medium Term Open Access~~, the drawee DIC shall open such Letter of Credit or provide such acceptable instrument of payment security mechanism that shall be	It is understood that Transmission charges are to be paid by drawee DIC hence, drawee DIC need to furnish the LC.

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		(2) In case tripartite agreement for securitization on account of arrears against the transmission charges with the Government of India exists, the Letter of Credit or the acceptable instrument of payment security mechanism shall have a term of 12 (twelve) months and shall be for an amount equal to 1.05 (one point zero five) times the average amount of the first bill of a year: Provided that where such tripartite agreement does not exist, the DIC shall open the Letter of Credit or provide an acceptable instrument of payment security mechanism for an amount equal to 2.10 (two point one times) the average amount of the first bill of a year. (3) If at any time, the amount for which Letter of Credit or the acceptable instrument of payment security mechanism is provided, falls short of the amount specified in Clause (2) of this Regulation, the DIC shall replenish such shortfall within 7 (seven) days of intimation by the Central Transmission Utility. (4) If a DIC fails to pay any bill or part thereof by the Due Date, the Central Transmission Utility may encash the Letter of Credit or recover through such other instrument of payment security mechanism provided by the DIC, the amount of the bill or part thereof that is overdue plus Late Payment Surcharge, if applicable.	operative from a date prior to the Due Date of its first bill. (2) In case tripartite agreement for securitization on account of arrears against the transmission charges with the Government of India exists, the Letter of Credit or the acceptable instrument of payment security mechanism shall have a term of 12 (twelve) months and shall be for an amount equal to 1.05 (one point zero five) times the average amount of the first bill of a year: Provided that where such tripartite agreement does not exist, the drawee DIC shall open the Letter of Credit or provide an acceptable instrument of payment security mechanism for an amount equal to 2.10 (two point one times) the average amount of the first bill of a year. (3) If at any time, the amount for which Letter of Credit or the acceptable instrument of payment security mechanism is provided, falls short of the amount specified in Clause (2) of this Regulation, the drawee DIC shall replenish such shortfall within 7 (seven) days of intimation by the Central Transmission Utility. (4) If a drawee DIC fails to pay any bill or part thereof by the Due Date, the Central Transmission Utility may encash the Letter of Credit or recover through such other instrument of payment security mechanism provided by the DIC, the amount of the bill or part thereof that is	

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		(5) In case of such encashment of the Letter of Credit or recovery through such other instrument of payment security mechanism provided by the DIC, in full or in part, by the Central Transmission Utility in accordance with these regulations, the DIC shall replenish the amount through the Letter of Credit or such other instrument of payment security mechanism, as the case may be, within 7 (seven) days of intimation of such encashment or recovery by the Central Transmission Utility. (6) The DICs shall renew the Letter of Credit or such other instrument of payment security mechanism, 30 (thirty) days prior to the date of expiry	overdue plus Late Payment Surcharge, if applicable. (5) In case of such encashment of the Letter of Credit or recovery through such other instrument of payment security mechanism provided by the drawee DIC, in full or in part, by the Central Transmission Utility in accordance with these regulations, the drawee DIC shall replenish the amount through the Letter of Credit or such other instrument of payment security mechanism, as the case may be, within 7 (seven) days of intimation of such encashment or recovery by the Central Transmission Utility. (6) The drawee DICs shall renew the Letter of Credit or such other instrument of payment security mechanism, 30 (thirty) days prior to the date of expiry	

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Annexure-II

WIPPA Comments on Supplementary Draft Proposed by Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022

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16	13(1)	4. Clause (1) of Regulation 13 of the Principal Regulations shall be substituted with the provisions as under: "(1) No transmission charges for the use of ISTS shall be levied for the following GNA quantum (GNA_{RE}), for scheduling power from (i) REGS or RHGS based on wind or solar sources or (ii) ESS charged with REGS or RHGS based on wind or solar sources: GNA_{RE} (in MW)= GNA X $\frac{\sum_{n=1}^{T}\left(\frac{SDR_G}{SDT_G}\right)}{T}$ Where • SDR_G is drawl schedule (in MW) through ISTS under GNA from entities covered under subclauses (i) and (ii) of this Regulation in nth block. • SDT_G is total drawl schedule(in MW) under GNA through ISTS from all sources in nth block.	4. Clause (1) of Regulation 13 of the Principal Regulations shall be substituted with any one of the provisions as under: 1. GNA_{RE} (in MW) = GNA 2. Provided that if a dedicated consumer procuring / utilizing GNA for RE power only, wherein in all time block SDR_G will equal to SDT_G, the provision of 75% of maximum schedule corresponding to GNA will not apply for such consumer. 3. "(1) No transmission charges for the use of ISTS shall be levied for the following GNA quantum (GNA_{RE}), for scheduling power from (i) REGS or RHGS ~~based on wind or solar sources or~~ (ii) ESS charged with REGS or RHGS ~~based on wind or solar sources~~: GNA_{RE} (in MW)= GNA X (Monthly avg ADR_G)/(Monthly avg ADT_G) Where	1. "Renewable Hybrid Generating Station" or "RHGS" is defined in CGNA Regulation 2022 as *a generating station based on hybrid of two or more renewable source(s) of energy with or without Energy Storage System, connected at the same inter-connection point*". Whereas, the waiver is allowed to renewable hybrid generating station with a combination of wind and Solar only, and not other renewable sources (PSS, SHP etc). In view of the above, ISTS charge waiver may be extended to RHGS as defined above 2. We would like to propose following options, which will help the objective of MoP to provide waiver of RE Projects till 30.06.2025. i. Remove the condition of 75% for $GNA_{RE,}$ so that RE Consumer may able to get complete waiver on procurement of RE Power for all time blocks. **GNA_{RE} (in MW) = GNA**

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		• 'n' is the nth time block • T is number of time blocks in a month = 96X number of days in a month Provided that in case total drawl schedule (in MW) under GNA through ISTS from all sources, for nth time block, is less than 75% of Maximum schedule corresponding to GNA, the "SDT_G" shall be taken as 75% of maximum schedule corresponding to GNA for the nth block.	• ~~S~~ADR_G is the average of daily maximum actual ~~schedule~~ drawl (in MW) through ISTS under GNA from entities covered under subclauses (i) and (ii) of this Regulation ~~in the nth block~~ • ~~S~~ADT_G is the average of daily maximum actual total actual drawl ~~schedule~~(in MW) under GNA through ISTS from all sources ~~in nth block of the day~~. • ~~'n' is the nth time block~~ • ~~T is number of time blocks in a month = 96X number of days in a month~~ ~~Provided that in case total actual drawl schedule (in MW) under GNA through ISTS from all sources, for nth time block, is less than 75% of Maximum schedule corresponding to GNA, the "SDT_G" shall be taken as 75% of maximum schedule corresponding to GNA for the nth block.~~	OR ii. It is to be noted that C&I consumers play a major role for promotion of Renewable Energy. As per proposed clause, dedicated RE based C&I Consumers have to make payment for uncertain amount of GNA, due to applicable provision of 75%. In view of that we would like to propose that if a dedicated consumer procuring / utilizing GNA for RE power only, wherein in all time block SDR_G is equal to SDT_G, the provision of 75% of maximum schedule corresponding to GNA will not apply for such consumer. **If, $SDR_G = SDT_G$, then $GNA_{RE} = GNA$** OR 3. Linking GNA_{RE} with daily maximum average drawl would be an optimum solution as RE is not available throughout the day. It also suggested that actual drawl to be taken instead of scheduled drawl to improve the accuracy. Further, Proposed GNA for the States under GNA Regulation is derived from day-wise actual peak drawl

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				hence it is requested that a similar methodology may be adopted for the calculation of GNA_{RE} also. **GNARE (in MW)= GNA X (Monthly avg ADRG)/(Monthly avg ADTG)** • ADRG is the average of daily maximum actual drawl (in MW) • ADTG is the average of daily maximum actual total actual drawl (in MW)
17	13 (2)	(2) No transmission charges for the use of ISTS shall be levied for the following T-GNA quantum, for scheduling power from (i) REGS or RHGS based on wind or solar sources or (ii) ESS charged with REGS or RHGS based on wind or solar sources: $T\text{-}GNA_{RE}\text{ (in MW)} = T\text{-}GNA\ X \frac{\sum_{n=1}^{T}\left(\frac{SDR_{TG}}{SDT_{TG}}\right)}{T}$ • SDRTG is drawl schedule (in MW) through ISTS under T-GNA from entities covered under subclauses (i) and (ii) of this Regulation in nth block. • SDTTG is total drawl schedule(in MW) under T-GNA through ISTS from all sources in nth block.	suggestion mentioned above may be considered here too.	

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		• 'n' is the nth time block • T is number of time blocks in a month = 96X number of days in a month or part of the month, as the case may be Provided that in case total drawl schedule (in MW) under T-GNA through ISTS from all sources for a time-block, is less than 75% of maximum schedule corresponding to T-GNA for the time-block, the "SDTTG" shall be taken as 75% of maximum schedule corresponding to T-GNA. Provided further that the reimbursement, from the already paid T-GNA charges, on account of T-GNARE shall be made ex-post on finalization of schedules, by 15th day of the next month		