

Ref: - GEPL/2021-22/CERC/20220215

Date: 15.02.2022

**To,**

**The Secretary,**  
Central Electricity Regulatory Commission,  
3<sup>rd</sup> & 4<sup>th</sup> Floor, Chanderlok Building, 36,  
Janpath, New Delhi-110001

**Subject:- Comments /Observations/Suggestion sought by CERC on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021**

**Dear Sir,**

At the outset, we extend our gratitude to hon'ble Central Electricity Regulatory Commission for inviting Comments/Suggestions/Observations on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021. We wish to submit our observations/comments and objections/suggestions as attached herewith.

We humbly request the hon'ble Commission to favourably consider our comments/suggestion in larger interest of Stakeholders.

Thanking You,  
For M/s GREENKO ENERGIES PRIVATE LIMITED



Y.K Sehgal  
**Authorised Signatory**

Sr. No.	Clause no.	Existing Clause	Revised Clause / New Clause	Rationale
1	2.1 (b)	“Associated Transmission System” or “ATS” for Applicant(s) for Connectivity means the ATS as determined in accordance with Regulation 6 of these regulations;		<p>It is requested that creation of transmission line and additional transmission infrastructure beyond the substations should not be make part of “ATS”, as it would increases the Conn BG II requirement, which need to be furnished by the Applicant as per the provision of Regulation.</p> <p>Instead of ATS, it is requested to make system beyond ISTS pooling Substation as a part of strengthening scheme.</p>
<b>Provisions related to Clause 4 - Eligibility for Connectivity to ISTS</b>				
	4.1 (b)	Captive generating plant with capacity for injection to ISTS of 50 MW and above;	Co-located or “behind-the-meter” generating plant with capacity for injection to ISTS of 50 MW and above;	<p>The relevant classification under this discussion is either the technology-type (i.e. Renewable / Renewable with Storage / Standalone ESS) or the mode of connectivity (Individual / with Lead Generator / through electrical system of a generating station)</p> <p>However, “Captive” is a classification based on fulfilment of ownership + consumption criterion set out in the Electricity Rules.</p> <p>Moreover, each of the other defined types of entities defined under 4.1 (a), 4.1 (c), 4.1 (e) can also be “Captive”. In such case, there will be challenge in</p>

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				whether considering such station under 4.1 (b) or 4.1 (a) / (c) / (e).
2	4.1 (E)	..... Provided that such an entity applying for grant of Connectivity to ISTS has an agreement with the <u>said generating station to share its electrical system</u> and dedicated transmission lines, if any	..... Provided that such an entity applying for grant of Connectivity to ISTS has an agreement with the <u>said generating station / ESS to share its electrical system</u> and dedicated transmission lines, if any	<p>Slightly modification is desired, as in few instances, REGS/RGHS/Generating Station may also ask for Grid Connectivity with electrical system of Standalone Energy Storage system.</p> <p>In such scenario, agreement between ESS and REGS/RGHS/Generating Station are required to be executed and provided to CTU for grant of Connectivity.</p>
3	4.1 (f)	New Incorporation under Connectivity applicant category	(f) Bulk Consumer with a contracted capacity of 50 MW and above individually or aggregating 50 MW through same group of companies, one such consumer can function as lead consumer.	<p>Bulk Consumers are required to be included in the applicant list for Connectivity.</p> <p>It is to be noted that Regulation has included Bulk Consumer under GNA category list, but not included in Clause 4.1, though, clause 12.5 necessitate the requirement of Grid Connection for Bulk Consumer with ISTS network.</p> <p>Additionally, Explanatory Memorandum has clarified with the reason that GNA implicitly contains Connectivity itself. It is to be noted that Bulk consumers are required to be furnish various details, such as type of load, connection details, contracted demand, voltage level for physical connection at which connectivity is</p>

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				<p>desired etc. As, these details are necessary for interconnection, Hence, it is requested that Connectivity has to be kept for bulk consumers too, though BG requirements and connectivity related charges may be exempted.</p> <p>Additionally, it is requested that individual consumer having less than 50 MW load, but aggregately, through group of consumers under same group of companies, having load more than or equal to 50 MW, should be made eligible for ISTS Grid connection.</p>
4	4.4	Additional Clause Insertion	Notwithstanding anything contained in Clause 4.1, grant of grid connectivity through Lead Generator/ Lead ESS may also be permitted with allocation of additional terminal bay at ISTS substation to Lead generator/Lead ESS and Lead generator shall also be allowed to enhance its internal electrical system including dedicated transmission line to accommodate enhanced grid connectivity.	<p>While applying connectivity, there may be requirement of strengthening of internal electrical system/dedicated transmission infrastructure including terminal bay at ISTS S/S. Therefore, while sharing the connectivity through Lead ESS/ Lead REGS, there may be situation when internal strengthening / <b><u>allocation of additional bay</u></b> by CTU may be required.</p> <p>In view of above, it is requested to be permitted.</p>
<b>Provisions related to Clause 5- Application for Grant of Connectivity</b>				
5	5.1	An Applicant, which is a generating station including	An Applicant, which is a generating station including REGS, shall apply for grant of	Definition of Renewable Energy Generating Station includes both RE sources integrated with and without

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		<p>REGS, shall apply for grant of Connectivity to the Nodal Agency for the quantum equal to the installed capacity of the generating station</p> <p>Provided that if such an Applicant already has Connectivity to intra-State transmission system for part of its installed capacity, it may apply for Connectivity to the ISTS for a quantum not exceeding the balance of the installed capacity;</p> <p>Provided further that if such an Applicant is a Renewable Hybrid Generating Station, it may apply for grant of Connectivity for a quantum less than or equal to the installed capacity.</p>	<p>Connectivity to the Nodal Agency for the quantum equal to the installed capacity of the generating station</p> <p><b>Provided that if such an Applicant is a REGS based on a renewable source of energy with Energy Storage System, it may apply for grant of Connectivity for a quantum less than or equal to the installed capacity.</b></p> <p>Provided that if such an Applicant already has Connectivity to intra-State transmission system for part of its installed capacity, it may apply for Connectivity to the ISTS for a quantum not exceeding the balance of the installed capacity;</p> <p>Provided further that if such an Applicant is a Renewable Hybrid Generating Station, <b>or Renewable Energy Generation Station with Storage</b>, it may apply for grant of Connectivity for a quantum less than or equal to the installed capacity.</p>	<p>energy storage solutions. While system without ESS requires connectivity to the extent of Installed capacity, systems with ESS at few instances may not require connectivity for the whole installed capacity, during such instances, part of the generation may get stored during peak generation for utilization at later stage, depending on the application. Similarly, there may be cases, where Renewable sources integrated with ESS injects into grid for less quantum than installed capacity.</p> <p>In most of cases, injection into grid would be a function of Renewable installed capacity and capacity of Energy Storage Solution.</p> <p>Illustration for Solar Projects integrated with ESS are as under:</p> <p>Installed capacity of Solar – 2500 MW Installed capacity of ESS – 1000 MW/4000 MWh As per current clause, such applicant must apply for Connectivity for quantum equal to 3500 MW, though, the injection into grid depends upon the type of contract from the projects (It could be peak hour supply from RE sources or Renewable Energy – Round the</p>

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				<p>Clock supply). Flexibility must be given to applicant to choose the quantum of outflow from the projects.</p> <p>Moreover, such provision is already available for RHGS.</p> <p>This optimization in connectivity quantum would further help to optimize the subsequent transmission capacity needs to be developed. In view of same, it is requested to suitably amend the Clause to incorporate the desired changes.</p>
6	5.2	Notwithstanding anything contained in Regulation 5.1, a generating station, with prior approval of CTU, shall be eligible to add, within the quantum of Connectivity granted to it, additional generation capacity, including ESS, and for this purpose, the generating station shall apply to CTU, along with non-refundable application fee of Rs 3 lakh along with applicable taxes;	Notwithstanding anything contained in Regulation 5.1, a generating station, with prior <del>approval</del> <u>intimation</u> to CTU, shall be eligible to add, within the quantum of Connectivity granted to it, additional generation capacity, including ESS, and for this purpose, the generating station shall <del>apply</del> <u>inform</u> to CTU.	In such scenario, it again falls into priority-based connectivity system of CTU, to avoid the same, it is requested that provisions related to information shall have to be kept instead of approval as long as outflow shall remain same.

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7	Additional provision insertion under Clause 5.6		Provided further that enhancement in internal transmission system including dedicated transmission line and additional terminal bay may be required for this purpose and same shall permitted under current provision.	It also includes of such cases, wherein strengthening of dedicated transmission line or addition in dedicated line and terminal bay at ISTS S/s is required to cater the increased quantum in connectivity due to new application on the electrical system of already connectivity grantee.
8	Clause 5.9 (New Clause)	Insertion of Additional Clause	<p>The Applicants who have been granted Connectivity to ISTS for the generation projects based on particular renewable energy source(s) or ESS may, for the same capacity of connectivity granted, change to another renewable energy source(s) / or ESS in part or full, under intimation to CTU. In such cases, CTU shall incorporate the necessary change in connection agreement.</p> <p>This may be also be granted while processing of application.</p>	<p>It is highly recommended that flexibility has to be provided to developer to change the source after grant of connectivity, with proper intimation to CTU.</p> <p>In case of generating station including REGS and ESS which has already been granted connectivity shall have flexibility to change source as long as the total quantum of connectivity shall remain unchanged.</p>

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8	<b>Clause 6 &amp; 7; Interconnection Study by Nodal Agency and ATS and In Principle Grant of Connectivity by the Nodal Agency:</b>  1. Interconnection study needs to be carried out as per clause 6, wherein ATS requirement may be assessed and Grid Connectivity will be awarded to Generator in accordance with clause 7, based on such ATS assessment. Such ATS may not be at immediate connectivity pooling point, but somewhere beyond the pooling point. Now it may be possible that immediate connectivity may be feasible, but as ATS beyond pooling substation is required, and due to this reason connectivity will granted to generator under current provisions and hence CTU will not allow interconnection till ATS beyond pooling station will get constructed.  Additionally, under current provisions of regulations, T-GNA shall not be granted to generator.  Hence, under such scenario, Grid Connectivity has to be granted and power flow under T-GNA should be allowed until ATS comes and final GNA becomes effective.  2. To avoid uncertainty of mismatch of commissioning of ATS particularly for REGS/ RHGS/ ESS and respective generation/ energy storage, proactive approach in advanced transmission planning is required to plan for creating new pooling stations from various locations such as RE rich areas, locations where energy storage stations particularly Pumped Storage Projects (PSP) is planned. It will help in rapid development of RE integration and ESS installation in the country. Such system has to be created, wherein RE and ESS developers have to plugged in their generation.			
Provisions related to Clause 8- Connectivity Bank Guarantee				
9	Clause 8	Connectivity bank Guarantee:  BG required without Associated Transmission System (ATS):  • Conn-BG-1: Rs. 50 lakhs		It is pertinent to be mention that Connectivity should not be treated differently for Projects awarding connectivity with ATS and without ATS, it's a discriminatory approach for awarding connectivity based on ATS and non ATS.  In many cases, developers wait for any other developer to grant connectivity based on ATS, and when such



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		<ul style="list-style-type: none"> <li>Conn- BG-2:               <ul style="list-style-type: none"> <li>132 kV – Rs. 2 Cr.</li> <li>220 kV – Rs. 3 Cr.</li> <li>400 kV – Rs. 6 Cr.</li> <li>765 kV – Rs. 12 Cr.</li> </ul> </li> <li>Conn BG – 3: Rs. 2 Lakh/ MW</li> </ul> <p><b>BG requirement with Associated Transmission System (ATS):</b></p> <ul style="list-style-type: none"> <li>Conn – BG -1: Rs. 50 Lakhs</li> <li>Conn – BG – 2: Estimated Cost for ATS.</li> </ul>		<p>grantee furnish the BG to CTU corresponding to ATS, after those other developers will approach CTU for award of connectivity. As in this case, they don't have to submit BG with respect to ATS.</p> <p>Hence, we request that identical approach for both the category of consumers, with ATS and without ATS, is required to be create., wherein similar BG on the basis of per MW has to be furnished by every developer.</p> <p>Further, it is requested that the projects having PPA/LOA and the projects, which are in advanced stage development have to be exempted from the burden of BG submission, as these projects have PPA/LOA.</p> <p>Similar to above, projects which are in advanced advance stage of development and qualified certain milestones like Land Acquisition, Award of ~10 % of work, water approval, such projects have to exempted from the BG submission.</p> <p>We understand that BG's requirement is for such projects are required to be exempted.</p>
<b>Provisions related to Clause 10- Connectivity Agreement</b>				
10	Clause 10.1	An entity which has been intimated the final grant of Connectivity, <b>shall furnish technical connection data,</b>		It is requested that connection details such as technical connection data, inter-alia, generator data for fault studies, dynamic simulation data, details of data and voice communication must make part of Conn 5 & 6.

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		inter alia, generator data for fault studies, dynamic simulation data, details of data and voice communication, to the Nodal Agency as stipulated in the Detailed Procedure for Connectivity and GNA issued in accordance with Regulation 39.1.		Instead of asking upfront at the time of connectivity agreement, such studies and details must be asked in later stage, before 1- 2 months of physical connection as current practise.
Provisions related to Clause 12- Dedicated Transmission line and bays				
11	Additional Clause/ Additional insertion under Clause no. 12 Dedicated Transmission line & Bay		Pumped Storage Projects/ Large Hydro Projects of 250 MW and above shall not be required to construct a dedicated line to the point of connection and such stations shall be taken into account for coordinated transmission planning by the Central Transmission Utility and Central Electricity Authority	<p>One of the rationales for designing the Draft GNA is to enable the seller to compete purely on the basis of energy charges and efficiency. Therefore, in case any generator has to lay down dedicated transmission would have to locate its plant in such a way that dedicated line would be of minimum length.</p> <p>Further, CEA has developed Green Energy Corridor along with pooling station to evacuate power from areas enriched with Renewable Energy resources. It is to be noted that these areas were too far ISTS network.</p> <p>Aforesaid approach has brought up transmission network in close proximity of RE generation and</p>

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				<p>developers not required to develop long transmission lines and have to just plug and play. Hence, Dedicated transmission line lengths of such projects effectively reduced. However, in case of a Pumped Storage Project, which is location specific as well as highly capital intensive and in most of cases are far away from ISTS network. Construction of long-distance dedicated transmission line, more than ~ 100 KM, creation of such dedicated transmission line is itself capital intensive, would be detrimental factor in promotion of PSP, which are very much essential to integrate large scale of Renewable Energy.</p> <p>In view of above, it is suggested that as provided in the Connectivity Regulation dated 7th August 2009, wherein it was mandated to provide Grid Connectivity at the door step of thermal power projects having capacity more than 500 MW, and hydro generating station of 250 MW.</p> <p>It is also be noted that the Ministry of Power (MOP), Office Memorandum dated 8<sup>th</sup> March 2019 on measures to promote hydro power sector, wherein one of the promotional measures mandated budgetary support for creation of infrastructure such as roads / bridges for development of large hydro power including</p>

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				<p>pumped storage projects. Hence, a similar support is also required to be provided by reducing dedicated transmission infrastructure bringing ISTS system at door step of LHP/PSP.</p> <p>Considering above, it is suggested that the hon'ble Commission to incorporate this additional clause in the GNA regulation, which was earlier in Grid Connectivity 2009 regulation regarding length of dedicated transmission line for LHP/PSP Projects should not be more than ~10 - 15 Km as long distance of dedicated line may increase the project capital cost and leave many resources rich locations unviable.</p>
12	12.5	In case of an entity covered under Regulation 17.1(iii), the line to connect such an entity to the ISTS and necessary augmentation for providing connection to the ISTS, shall be constructed and maintained by <u>a licensee</u> at the cost of such entity;	In case of an entity covered under Regulation 17.1(iii), the line to connect such an entity to the ISTS and necessary augmentation for providing connection to the ISTS, shall be constructed and maintained by <u>PGCIL under regulated tariff mechanism</u> at the cost of such entity;	<p>It is requested that award of construction of such Transmission lines has to be given to PGCIL directly under Regulated Tariff Mechanism (RTM), and this process should not be called out under TBCB, which lengthy and cumbersome. Hence, to facilitate rapid execution and providing early access of ISTS power to Bulk Consumer, RTM option has to be exercised.</p> <p>Such transmission cost has to be converted into transmission tariff and same shall have to be obtained from the Bulk Consumer.</p>
Provisions related to Clause 15.3- Transfer of Connectivity				

Sr. No.	Clause no.	Existing Clause	Revised Clause / New Clause	Rationale
13	Clause 15.3	Any person which acquires 51% or more shareholding of the company or its <b>subsidiary or affiliate</b> company owning REGS or part thereof in terms of Regulation 15.2, may after COD of such part, apply to the Nodal Agency for transfer of Connectivity.	Any person which acquires 51% or more shareholding of the company or its <b>subsidiary or affiliate</b> company, <u>of the company</u> owning REGS or part thereof in terms of Regulation 15.2, may after COD of such part, apply to the Nodal Agency for transfer of Connectivity.	This clause is creating ambiguity, request you to create an unambiguous clause, which will be easy to understand and contemplate.
14	Clause 16.2	Conn-BG2 and Conn-BG3 shall be returned in five equal parts over five years corresponding to the generation capacity which has been declared under commercial operation by the Connectivity grantee.	Conn-BG2 and Conn-BG3 shall be returned <u>within 30 days from the date of commissioning</u> of corresponding generation capacity, which has been declared under commercial operation by the Connectivity grantee.	We request that BG should be returned just after commissioning of the projects, keeping BG for 5 years may hindered the smooth operation of Business.
15	22.2 (a)	Connectivity grantees covered under Regulation 4.1 of these regulations shall be deemed to have been granted GNA, equal to the quantum of	Connectivity grantees covered under Regulation 4.1 of these regulations shall be deemed to have been granted GNA, equal to the quantum of Connectivity from the start date of Connectivity. However, option regarding <b>start date of GNA</b> would be given to those connectivity	There will be a scenario wherein Stage II connectivity has been granted and due to certain reasons including COVID, LTA has not been applied.  Moreover, entities are strategizing the projects based on the current connectivity regulations and procedures and now there would be entire change of regime.

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		Connectivity from the start date of Connectivity.....	grantees who already have been granted Stage II connectivity and have not applied for LTA. Options include the start date of GNA would vary between <b>0 to 15 months from the start date of connectivity as opted by the</b> connectivity grantee.....	In view of the above, it is requested that option to select (0-15 months) the start date of GNA would be provided to the connectivity grantees.
16	22.2 (D)	Entities covered under Regulation 4.1 and clause (iii) of Regulation 17.1 of these regulations shall furnish one-time GNA charge for Rs. One lakh per MW for the quantum of GNA one month prior to the start date of GNA.	<del>Entities covered under Regulation 4.1 and clause (iii) of Regulation 17.1 of these regulations shall furnish one-time GNA charge for Rs. One lakh per MW for the quantum of GNA one month prior to the start date of GNA.</del>	We request that such entities covered under clause 4.2 and 17.1 (III) should not have to pay one-time GNA, instead, such charges have to make part of pooled system. Additionally, there is no rationale mentioned in Explanatory Memorandum for such requirement.
<b>Provisions related to Clause 26.1 – Eligibility for Temporary GNA</b>				
17	Clause 26.1	As buyers, (i) Distribution licensee directly connected to ISTS;	As buyers, (i) Distribution licensee directly connected to ISTS <b><u>and Connected through State Transmission Utility;</u></b>	There may be instances, wherein Distribution Utility connected with STU network may seek T-GNA. To fulfill such conditions, they are required to make eligible for T-GNA under this clause.
18	New Clause to be inserted after		Generating Station / ESS for part connectivity granted with ATS, till the ATS comes into operation.	In accordance with the Draft regulation 26.1, T-GNA propose to be granted to buyer/Trading Licensee/Power Exchanges, we suggest that the T-GNA should also be allowed to be granted to generating

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	clause 26.1 (C)			<p>stations/ESS. The rationale behind our suggestion is as under:</p> <p>For e.g.: - 1000 MW generator applied for connectivity, after system studies, it is found that 500 MW can be injected into existing system and rest 500 MW, there would be requirement of ATS, which may take sizable time to come into operation. In such case, we suggest that 1000 MW connectivity shall be allowed and 500 MW GNA to be allowed immediately and rest 500 MW can be allowed with the commissioning of such ATS. Such 1000 MW generator should be allowed to grant T-GNA till such period.</p> <p>Additionally, while interconnection study as per clause 6, ATS requirement may be assessed, Such ATS may not be at immediate connectivity pooling point, but at beyond the pooling point. Now it may be possible that immediate connectivity may be feasible, but as ATS beyond pooling substation is required, and due to this reason connectivity will not be effective and hence, CTU will not allow interconnection till ATS beyond pooling station gets implemented. In view of above, we request you to grant immediate connectivity during such scenario and so that power can flow under T-GNA.</p>

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18	Clause 38, Arrangement of Transition (Additional insertion under clause 38)	Regarding Stage I connectivity grantee	Priority to be given to Stage I connectivity grantees	<p>Most of the entities are under different stages of conceptualization of their power projects and already have invested a lot by obtaining Stage I connectivity under the current connectivity regulations and procedures issued by the Hon'ble Commission.</p> <p>Therefore, it is requested to provide priority to those entities while granting connectivity under this regulation, as this regulation has been devised to award connectivity based on Installed capacity and not based on LOA/PPA. Similarly, the Stage I connectivity under current regulation is being awarded based on Installed Capacity.</p> <p>We understand that Draft GNA has proposed the concept of providing Grid Connectivity based on Installed Capacity and other requirements such as PPA/LOA have been gone away, while coming in to force of this regulation.</p> <p>In previous regime, Connectivity have been provided to RE developers in two stages, in 1<sup>st</sup> Stage connectivity have been provided based on installed capacity and subsequently, Stage II connectivity have been provided based on LOA/PPA.</p>



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				In the draft GNA, transition of connectivity, LTA, and MTOA have been explained, whereas, it has not been clarified that how transition of Stage I connectivity grantee will take place, as these Stage I grantees have already paid Grid connectivity fee to obtain Grid Connectivity.
19	Clause 40.1	The transmission charges and losses for use of the inter-State transmission system shall be shared among <u>buying entities</u> of ISTS in accordance with the Sharing Regulations.	The transmission charges and losses for use of the inter-State transmission system shall be shared among <u>consuming entities</u> of ISTS in accordance with the Sharing Regulations.	<p>However, during workshop conducted by CERC on Draft GNA dated 3<sup>rd</sup> Feb 2022, it has been clarified that Storage projects, during charging should not be counted as consuming entity. further, we are raising the written clarification for the same.</p> <p>It is to be noted that in case of Standalone storage projects draw power and supply the same in different hours to ultimate buying entity.</p> <p>Transmission charges for the same must be borne by ultimate buying entity.</p> <p>We would like to draw your kind attention towards situation, wherein Standalone Storage stores energy to deliver the same in other time period, it may be interpreted by other stakeholders that Standalone Storage is buying power to deliver the same in other</p>

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				time block, whereas, Standalone Storage is only performing function of energy shift. Hence, we request you to clarify that Standalone Storage should not have to be borne transmission charges in such scenarios.
20	<b><u>MoP orders on ISTS waiver need to be considered within GNA framework</u></b>			One of the challenges in the proposed GNA framework is how to implement the ISTS waiver provisions for RE and energy storage solutions as per MoP notification. The same has been recognized by CERC during the Stakeholder call. So CERC requested all the Stakeholders to propose their views on how to implement ISTS waiver in proposed GNA framework. In view of same, we are submitting our brief views in the <b><u>Appendix-I</u></b> . We shall submit our detailed views at the time of CERC sharing regulations amendment.

## **APPENDIX I: Implementation of Ministry of Power (MoP) Transmission Waiver Order dated 23<sup>rd</sup>, 30<sup>th</sup> November 2021 under GNA Regime**

In the current regime ISTS charges are waived for RE for the quantum corresponding to the projects meeting MoP ISTS waiver notifications. There is no challenge to identify such sources as LTA quantum, in the current regime, is sum of all LT contracts including such waiver-based contracts. However, GNA quantum is delinked from the contracts, so mapping contracted capacity with the GNA capacity is not possible, making it difficult to implement ISTS waiver provision.

We propose that GNA quantum may be bifurcated into parts, in proportion to the energy drawl (in MU) by the entity from non-Waiver based sources and Waiver based sources. The proportion of GNA corresponding to non-Waiver based sources will only be considered for Sharing of ISTS charges.

A simple illustration is provided below:

	Actual GNA, in MW	Drawl source	Drawl during the month, in MU	GNA considered for Sharing of ISTS charges, in MW
	a			$c = a * b1 / (b1 + b2)$
State A	10,000	From non-waiver sources (b1) #	5,100	8,095
		From waiver sources (b2) @	1,200	
State B	12,000	From non-waiver sources (b1)	5,200	7,341
		From waiver sources (b2)	3,300	

# Include non-RE and Solar and Wind commissioned after June'25"

@ Include Solar and Wind sources commissioned before June'25 as per MoP notification dt. 23.11.2021"

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