

## Ref No. JPL/BD/CERC/2021-22/01

25/02/2022

To,
The Secretary,
Central Electricity Regulatory Commission,
New Delhi

Kind Attn.: Shri Sanoj Kumar Jha

Sub:

Comments/suggestion on draft CERC (Connectivity and General

Network Access to the inter-State Transmission System) Regulations,

2021.

Ref:

Public Notice No. L-1/261/2021/CERC Dated: 16.12.2021

## Respected Sir,

Comments / suggestions / objections were invited from the stakeholders and interested persons in reference to the CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021 vide the above referenced Public Notice. Jhabua Power as an ISGS is a direct stakeholder and therefore is desirous of offering its comments, keeping in view the far reaching consequences of the above regulations. Our comments/suggestion are enclosed in Annexure-I

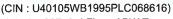
We, therefore, request the Hon'ble Commission to kindly consider our comments / suggestions while finalizing the Draft Regulations.

Thanking Wood Yours Sincerely

Roopan Bansal

(Senior Manager – Business Development)











## Annexure-1

## Comments/suggestion on draft CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021.

Clause No.	Comments
18.1 (f) Entity(ies) covered under Regulation 4.1 of	Commission may clarify the following
these regulations where Long Term Access granted	points.
to such entity or to its identified buyer, under the	
Connectivity Regulations has become effective,	A Generating Plant is already connected to
shall be deemed to have been granted GNA equal	ISTS and having connectivity agreement
to the quantum of such Long term Access, under	with CTU of full capacity of the plant.
these regulations.	However, 71% of the capacity is tied up with
	buyer under LTA and remaining quantum is
Grant of GNA to entities other than STU	traded under collective and Short term open
	access. In that case will the generator have to
22.2 (a) Connectivity grantees covered under	apply separately for the GNA to inject power
Regulation 4.1 of these regulations shall be	under collective and STOA transaction or the
deemed to have been granted GNA, equal to the	generator shall be deemed to have been
quantum of Connectivity from the start date of	granted GNA for the total installed capacity
Connectivity	of the plant.
22.2(d) Entities covered under Regulation 4.1 and	The GNA charges of 1 Lakh/ MW for the
clause (iii) of Regulation 17.1 of these regulations	quantum of GNA will be the additional
shall furnish one-time GNA charge for Rs. One	expenditure to the generating station and will
lakh per MW for the quantum of GNA one month	be treated as Change in Law.
prior to the start date of GNA.	
	Therefore, we would request the Hon'ble
In case, such charges are not furnished by the entity	commission to waive off the GNA fees.
within the specified timeline, the same shall be	
recovered by encashment of Conn-BG1, Conn-	
BG2 and Conn-BG3 as required. The proceeds of	
such onetime GNA charge shall be used for	
reducing Monthly Transmission Charges under the	





Sharing Regulations.

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