

Ref. No. CE/PP/GNA/03456

Date: 15.02.2022

To,
The Secretary,
Central Electricity Regulatory Commission,
3rd and 4th Floor Chandralok Building,
36 Janpath, New Delhi-110001

Sub: Submission of comments / suggestions on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021.

Ref: 1) Public Notice L-1/261/2021/CERC dated 16.12.2021.
2) Public Notice L-1/261/2021/CERC dated 14.01.2022.

Respected Sir,

This has reference to the draft regulation published by Hon'ble CERC in regards to the Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021 and accordingly comments sought from stakeholders vide ref. (1) and (2).

In the outset MSEDCL would like to submit its comments/suggestion on the aforementioned draft regulations considering the impact on Discoms and seamless operations. Some of the major comments/suggestions of MSEDCL on the said draft regulations are as below:

1. Deemed grant of GNA

As per the draft regulations (18.1), GNA for a particular State is based on the average of maximum drawal of the State for the financial years i.e. FY 2018-19, FY 2019-20 and FY 2020-21. In this regards it is to submit that, the drawl of each state from ISTS includes

- (i) LTA/MTOA from conventional sources,
- (ii) Inter State RE LTA/MTOA contract.
- (iii) Bilateral and Collective Transactions of all Intra state entities.
- (iv) Drawl from ISGS stations connected to Intra Sate transmission network.

Sr.	ISGS Stations	Name of Intra state transmission lines to which connected.
1	RGPPPL	400 KV Dabhol -Nagothane, Line I & II
2	Sardar Sarovar Hydro Project (SSP)	400 KV Dabhol-New Koyna, Line I & II
3	Pench Hydro Project	400 KV SSP to Dhule Line I & II
4	TAPS	132 KV Kanhan Line
		132 KV Mansar Line
		220 KV Boisar Line
		220 KV Borivali Line

Due to the presence of these components in the maximum drawl of the State, the GNA worked out as per the formula specified in Clause 18.1 can be either higher or lower as compared to the LTA/MTOA considered in deriving the transmission charges as per the CERC (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2020. In case of Maharashtra, the exiting LTA from conventional sources is of 7,103 MW and Inter State RE is about 1620 MW (Total Non-RE and RE = 8723 MW). Hence if GNA is worked out on the proposed formula/methodology, Transmission charges of Maharashtra and in turn MSEDCL will increase unnecessarily due to its major long term contract from conventional source i.e about 7000 MW out of 7103 MW.

Further, it is submitted that MSEDCL has executed its long term power purchase agreement with interstate RE generators through competitive bidding and the delivery point is state periphery and as per the MoP guidelines, due to waiver of transmission charges for RE power, the RE generators have not considered the loading of transmission charges in the tariff. The inclusion of RE component in calculation of GNA and same is considered for computation of interstate transmission charges as per Sharing Regulations, 2020, will create dispute between buyer and sellers and increases litigations in future.

Considering the above all, it is suggested to grant deemed GNA to each state equivalent to its Sum of Conventional LTA/MTOA and RE LTA / MTOA and out of these only Conventional LTA/MTOA component of deemed GNA which form the basis for raising bills under CERC Sharing Regulations, 2020.

2. Segregation of deemed GNA by SLDC

As stipulated in the draft regulations, SLDC shall segregate the deemed GNA of state to each intra-State entity, including distribution licensee and upon failure of same, segregation, the pro rata GNA shall be allocated to each intra-State entity in the ratio of their Long Term Access and Medium Term Open Access. In this regards, for the state of Maharashtra currently only MSEDCL has LTA at inter-state level while other utilities like BEST, AEML-D and TPC-D have no existing LTA at inter-state level. However, utilities such as BEST, AEML-D and TPC-D procure power through exchange and therefore the same is reflected in the drawl of the State which shall be deemed GNA of state as per the draft regulations. Due to the failure of SLDC to segregate the GNA, based on pro rate basis of LTOA/MTOA the additional drawl of these utilities may also be assigned to MSEDCL since other utilities don't have existing LTA at inter-state level and thereby leading to increase in transmission charges of MSEDCL. Thus it is requested to delete the provision and it shall be made mandatory for SLDC to submit the segregation of GNA for each intra-state entity to the STU, Nodal Agency and NLDC within the specified time frame and for this purpose detailed procedure should be specified in regulations itself so that there will be same methodology for all the states.

3. Debarment of TGNA Grantee

As stipulated in the draft regulation if the aggregate quantum of bid(s) in the power exchange(s) under bilateral transactions and collective transactions by a T-GNA grantee exceeds the quantum of the Standing Clearance in any time block, NLDC shall debar such T-GNA grantee from participating in bilateral and collective transactions. In this regards, it is to submit that National Open Access Registry (NOAR) is software based web portal

wherein Standing Clearance and short term open access applications are proposed to be centralised, hence once standing clearance is granted for T-GNA, it shall be linked to scheduling software of all RLDC. The scheduling software needs to take care of the aspect that T-GNA grantee is not scheduling above its T-GNA in any time block. Thus the provision of debarment may be deleted.

4. Revision in T-GNA

As stipulated in draft regulations, T-GNA granted under Advance application category for a period of more than one month can be reduced for the balance period with a prior notice of one month by the T-GNA grantee and the applicable T-GNA charges for the quantum of T-GNA granted shall be payable for the notice period of one month. In this regards it is to submit that as per the existing provision for short term open access, the revision of short term open access can be done after a minimum period of three days including the date of application and the same may be suggested to be incorporate in the proposed draft regulations. Further as per the existing provisions, the transmission charges payable are only for the first two days of the period for which the cancellation or downward revision of schedule has been sought. It is therefore requested to modify the draft provisions by allowing the transmission charges to be paid for T-GNA only for first two days from the date of revision of T-GNA and reimburse the balance transmission charges corresponding to the difference between the original quantum and revised quantum for the downward revision period.

5. Applicability of Transmission charges


As per the CERC Sharing Regulation 2020, no charges shall be payable for short term open access in case the distribution licensee has Long Term Open Access or Medium Term Open Access or both. On similar lines, additional provision may be included in this draft Regulation stating that Distribution licensee with existing Long or Medium Term Open Access or both and having deemed GNA granted under Clause 17.1 of the draft Regulations, may not be charged T-GNA transmission charges for collective and bilateral transactions.

The detailed comments/suggestions of MSEDCL on the draft regulations are attached herewith as **Annexure-A**

It is kindly requested to consider MSEDCL's comments/suggestion while finalizing the Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021.

Thanking you,

Your's faithfully,


Chief Engineer (Power Purchase)
MSEDCL

Copy s.w.r.to,
Director (Commercial), MSEDCL.

Annexure-A

MSEDCL Comments on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State transmission System) Regulations, 2021.

Clause Ref.	Existing Clause in Petition	Comments/Suggestions
3. Application for Grant of Connectivity and GNA	<p>3.2. Each application for grant of Connectivity shall be accompanied by a non-refundable application fee of Rs.5 lakh along with applicable taxes.</p> <p>3.3. Each application for grant of GNA shall be accompanied by a nonrefundable application fee of Rs.5 lakh along with applicable taxes.</p>	Non-refundable application fee should be brought down to Rs. 3 Lakh along with applicable taxes.
4. Eligibility for Connectivity to ISTS	<p>4.1. The following entities shall be eligible as Applicants to apply for grant of Connectivity or for enhancement of the quantum of Connectivity:</p> <p>(a) Generating station(s), including REGS(s), with or without ESS, with an installed capacity of 50 MW and above individually or with an aggregate installed capacity of 50 MW and above through a Lead Generator or a Lead ESS;</p> <p>(b) Captive generating plant with capacity for injection to ISTS of 50 MW and above;</p> <p>(c) Standalone ESS with an installed capacity of 50 MW and above individually or with an aggregate installed capacity of 50 MW and above through a Lead ESS or Lead Generator; (d) Renewable Power Park Developer;</p> <p>(e) REGS or standalone ESS with an installed capacity of 5 MW and above applying for grant of Connectivity to ISTS through the electrical system of a generating station already having Connectivity to ISTS:</p>	If any Bulk consumer intend to have connectivity to ISTS, same also needs to be included in eligibility criteria
5.1 Application for Grant of	5.1 An Applicant, which is a generating station including REGS, shall apply for grant of Connectivity	Normally in case of conventional Generator, power injected into Grid is less than installed capacity due Auxiliary power requirement for the Generator.

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Connectivity	to the Nodal Agency for the quantum equal to the installed capacity of the generating station	Whereas for RE (non-conventional) Generators, the auxiliary consumption is almost negligible. Further it proposed in regulation that Connectivity will be GNA of Generator and Transmission charges will be based on GNA. Hence it is suggested that in case of conventional generator, instead of install Capacity, connectivity shall be maximum exportable capacity to ISTS and for RE generator, it shall be installed capacity. Hence it is requested to modify the clause as below: <i>“An Applicant, which is a generating station including REGS, shall apply for grant of Connectivity to the Nodal Agency for the quantum equal to the installed capacity of the generating station less auxiliary consumption”</i> It is submitted that if the transmission line is created for the Installed capacity, then cost of the transmission system would increase and the end Drawee entity such as the DISCOM would have to pay the additional cost. ISTS charges would increase due to increase in redundancy of ISTS, which would ultimately be borne by DISCOMs.
5.5 Application for Grant of Connectivity	5.5 An Applicant, which is a Renewable Power Park Developer, shall apply for grant of Connectivity for the quantum for which it has been authorised by the Central Government or a State Government as a Renewable Power Park developer	It is submitted that additional provision may be included in the clause 5.5 stating that if the authorised quantum /capacity of the Renewable Park notified by Central /state Government is not commissioned within the stipulated time period, then in such case the connectivity granted to the Renewable Park Developer may be withdrawn by the Nodal agency
6.1 Interconnection Study by the Nodal Agency and ATS	6.1. On receipt of applications for grant of Connectivity, the Nodal Agency shall carry out interconnection study as specified in the CEA Technical Standards for Connectivity along with requirement of augmentation to the existing ISTS, if any, for enabling transfer of power over ISTS under General Network Access:	It is submitted that the timeline for completion of interconnection study by the Nodal Agency as per CEA Technical Standards for Connectivity shall be specified in the adjoining clause. Also separate timeline may be specified for interconnection applications related to augmentation to the existing ISTS.
7 In-principle Grant of Connectivity by the Nodal Agency	7.1 In the event the Nodal Agency after the interconnection study undertaken in accordance with Regulation 6.1 of these regulations, determines that no ATS is required, the Nodal Agency shall intimate in-principle grant of Connectivity to the Applicant within 30 days from the last day of the month in which the application had been received along with details such as terminal bay(s), already available or to be developed	It is submitted that grant of connectivity shall be restricted only to those generators/developers/ESS who have capacity tied up with the corresponding Distribution Licensees. The duration of grant of connectivity shall depend on the duration of existing / proposed PPA. Generators/Developers/ESS with no existing contract for sale of power shall not be granted connectivity to ISTS. Further, if there is a delay in the date of commissioning of the upcoming station/RE park/ESS, then the connectivity granted if any to ISTS shall be withdrawn. It is requested to include the above submission in the Draft

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	under ISTS through CTU, and minimum design features for dedicated transmission lines to be constructed by the Applicant.	Regulations
8. Connectivity Bank Guarantee	8.2.(b) Conn-BG3 @ Rs. 2 lakh/MW, for the existing ISTS, shall be furnished by entities covered under clause (a) of this Regulation.	<p>It is seen that Con BG-1,2 and 3 will be encased, if POC bills for three consecutive months are not paid as per regulation 16 of draft regulation. As seen from Jan-2022, POC bill, average all India, monthly POC charges on all India level is Rs. 3393 Crs, for all India level LTA of 104203.3MW. This means an average POC charge is Rs. 3.25 Lakhs per MW. The minimum POC charge per MW is Rs.2.13 and maximum Rs. 4.55 Lakhs per MW. Hence if we consider even 3 months minimum POC bills per MW, it will be Rs.6.39 Lakhs per MW and if we consider all India average, it will be Rs.9.75 Lakhs per MW.</p> <p>Further Con BG-1 will be returned within one month from Commercial operation of GNA and Con BG-2 is not required in case of Entities covered under Regulation 8.1.(a) sub para.</p> <p>Hence it is suggested that Con-BG-3 shall be increased and same shall be at least more than or equal to all India Average POC charges or Regional Average POC charges per month.</p>
10. Connectivity Agreement	10.1. An entity which has been intimated the final grant of Connectivity, shall furnish technical connection data, 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.	There is timeline given for each activity in Connectivity process except in this process. To have timely action on connectivity issue from Generator end also, it is proposed to have some timeline for this activity, say one month or 3 months which Commission deems suitable.
15. Transfer of Connectivity	<p>15.1. A Connectivity grantee shall not transfer, assign or pledge its Connectivity and the associated rights and obligations, either in full or in parts, to any person except as provided under Regulations 15.2 and 15.3 of these regulations.</p> <p>Provided that Connectivity granted to a parent company may be utilized by its subsidiary and Connectivity granted to a subsidiary may be utilised by</p>	<p>Proviso to Article 15.1 allows to utilize granted connectivity interchangeably between parent company and its subsidiaries. It is requested that the transferability of connectivity shall be limited to the parent company and its 100% subsidiary/ies only and not to any other subsidiary which is partially owned by the parent company. It is therefore requested that the proviso may include the term '100% subsidiary' in place of the term 'subsidiary'. The proviso of Article 15.1 is requested to modify as per the following.</p>

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	its parent company.	<i>“Provided that Connectivity granted to a parent company may be utilized by its 100% subsidiary and Connectivity granted to a 100% subsidiary may be utilised by its parent company”</i>
15. Transfer of Connectivity	15.3. Any person which acquires 51% or more shareholding of the company or its subsidiary or affiliate 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. The Nodal Agency shall issue revised grant of Connectivity on submission of applicable Conn-BG2 and Conn-BG3 by such person. The original grantee may substitute its Conn-BG2 and Conn-BG3 with revised Conn-BG2 and Conn-BG3, to be intimated by CTU. On issue of revised grant of Connectivity, such person shall enter into a fresh Connectivity Agreement and be responsible for compliance with all applicable regulations	It is submitted that in case of change in ownership of the company or its subsidiary or affiliate company, the Nodal Agency shall check/verify for validity of existing PPA/contracts with the new entity, before the transfer of connectivity to the new entity.
17 Eligibility for GNA	17.1. The following entities shall be eligible as Applicants to apply for grant of GNA or for enhancement of the quantum of GNA: (ii) A buying entity connected to intra-State transmission system; (iii) A distribution licensee or a Bulk consumer, seeking to connect to ISTS, directly, with a load of 50 MW and above; (iv) Trading licensees engaged in cross border trade of electricity in terms of the Cross Border Regulations; (v) Transmission licensee connected to ISTS for drawal of auxiliary power	It is submitted that while giving connectivity to Bulk consumers to connect to the ISTS system, the entire cost required for setting up necessary infrastructure including dedicated transmission line shall be borne entirely by the Bulk consumer and none of the cost of such transmission network shall be recovered from other consumers connected to ISTS system. It is requested to define the term ‘buying entity’ specified in sub-clause (ii) of Clause 17.1 and to also define the minimum load for ‘buying entity’ under this clause to make it eligible for connectivity to ISTS.
17 Eligibility for GNA	17.1. The following entities shall be eligible as Applicants to apply for grant of GNA or for enhancement of the quantum of GNA: (v) Transmission licensee connected to ISTS for drawl	At present, Auxiliary power requirement of any Transmission substation is billed by concerned Distribution licensee in which jurisdiction said Transmission substation is located. At present there is provision for Auxiliary consumption of EHV substation in

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	of auxiliary power	<p>CERC, Tariff Regulations 2019. The relevant clause is reproduced as under:-</p> <p><i>52. Auxiliary Energy Consumption in the Sub-station (1) AC System: The charges for auxiliary energy consumption in the AC substation for the purpose of air-conditioning, lighting and consumption in other equipment shall be borne by the transmission licensee and included in the normative operation and maintenance expenses.</i></p> <p><i>(2) HVDC sub-station: For auxiliary energy consumption in HVDC sub-stations, the Central Government may allocate an appropriate share from one or more ISGS. The charges for such power shall be borne by the transmission licensee from the normative operation and maintenance expenses.</i></p> <p>Hence it can be seen that in regulation, there is no provision for allocation of power from central Generating station for meeting Auxiliary power from AC substation of ISTS.</p> <p>In regarding to Auxiliary power consumption of AC Substation of PGCIL, there was petition filed by PGCIL i.e Petition No. 133/MP/2014 dated 28 th of February, 2017 .The relevant important remarks of CEA in this petition is as under:</p> <p><i>(b) Proposal of PGCIL to utilize tertiary winding of the ICTs at its substation as the primary source to feed auxiliary equipment reliability is considered in the interest of the grid security and hence, it is in order, subject to due care for necessary protections to safeguard the adverse impact arising from faults at tertiary winding and its downstream network.</i></p> <p><i>(c) PGCIL shall continue with HT feeder connection from State utility as secondary source of supply to its sub-stations, payment of which will be as per the contract agreement with the States</i></p> <p><i>(d) PGCIL needs to arrange at least one dedicated feeder from the nearby utility substation to its stations where no feeder is currently available and it is solely dependent upon its tertiary transformer and DG sets to meet the auxiliary power requirement. Similarly, there are sub-stations of PGCIL, where there are two dedicated feeders from State's sub-stations, DG sets as well as arrangement of supply from tertiary winding of the ICTs, for meeting</i></p>
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		<p><i>auxiliary power requirement. At such substations, PGCIL may consider to surrender one of the feeders to the state utility to economize on the O&M cost.</i></p> <p><i>(f) Proposal for allocating power from one or more CGSs to EHV AC substations of PGCIL in the country to meet the auxiliary consumption through tertiary winding of the ICTs is not considered practicable and appropriate</i></p> <p>In view of above recommendations of CEA, it is suggested that for all ISTS EHV substation with AC supply, there shall not be provision for GNA to meet Auxiliary power of substation.</p>
18 Deemed Grant of GNA	<p>18.1 On the date, these regulations come into force, (a) GNA for a (i) State including intra-State entity(ies) and (ii) other drawee entities, shall be the average of 'A' for the financial years 2018-19, 2019-20 and 2020-21:</p> <p>where, $'A' = \{0.5 \times \text{maximum ISTS drawal in a time block during the year}\} + \{0.5 \times [\text{average of (maximum ISTS drawal in a time block in a day) during the year}]\}$</p>	<p>It is submitted that the formula specified in the clause is derived based on the drawal of each state from ISTS which includes the following components</p> <ol style="list-style-type: none"> 1. LTA from conventional sources 2. Inter State LTA RE contract 3. Inter-state Bilateral and Collective Transactions of all Intra state entities and open access consumers. 4. Drawl from ISGS stations connected to Intra State transmission network. (In Maharashtra TAPS I & II, RGPPL, Sardar Sarovar hydro project, Pench hydro ISGS stations are connected to intra state transmission network) <p>It is submitted that due to the presence of above components in the maximum drawal of the State, the GNA worked out as per the formula specified in Clause 18.1 can be either higher or lower as compared to the LTA considered in deriving the transmission charges as per the CERC (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2020. For example, in case of Maharashtra, the exiting LTA from conventional sources is of 7,103 MW and Inter State LTA RE is about 1,620 MW (Total Conventional LTA/MTOA and RE LTA/MTOA = 8,723 MW).</p> <p>As per the CERC (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2020, the Inter State transmission charges are applicable based on the existing LTA from conventional sources i.e. on 7103 MW, whereas Inter-state LTA RE is covered under national component.</p> <p>Further, it is submitted that in Maharashtra, other discoms such as BEST, TPC-D and AEML-D, no power is sourced through inter-state network under</p>

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long term contracts, however, ISTS network is used by them for short term and other bilateral transactions, the quantum of which gets captured in the drawal of the state.

Further, in Maharashtra following ISGS stations are connected to intra state transmission line and interface meters of these lines are used by WRPC for computation of drawl of Maharashtra in DSM and same drawl is considered in calculation of deemed GNA in the draft regulation.

Sr.	ISGS Stations	Name of Intra state transmission lines to which connected and interface points thereof.
1	RGPPL	400 KV Dabhol -Nagothane, Line I & II
		400 KV Dabhol-New Koyna, Line I & II
2	Sardar Sarovar Hydro Project (SSP)	400 KV SSP to Dhule Line I & II
3	Pench Hydro Project	132 KN Kanhan Line
		132 KN Mansar Line
4	TAPS	220 KV Boisar Line
		220 KV Borivali Line

The quantum of drawl from ISGS stations which are connected to intrastate transmission lines (as per above table) is also included in the state drawl computations. Further, it is submitted that drawl quantum against short term purchase of other Utilities which is not part of ISTS LTA and is getting included in the derived deemed GNA quantum in draft regulations. In the existing LTA, MSEDCL has maximum share i.e almost 98% and other DISCOMs instead of making any long term contract, draws power from ISTS through short term basis, hence if GNA is worked out on the given formula/methodology, Transmission charges of Maharashtra and in turn MSEDCL will increased unnecessarily due to its major long term contract from conventional source.

The drawl is considered for calculation of GNA from ISGS stations connected to intra state transmission lines and also the drawl against short

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		<p>term power purchase of other intra state entities, hence it is requested not to derive GNA of State based on the data considered in the draft Regulations. Further as per the draft Regulation 22.1 (d), deemed GNA calculated as per formula given in clause 18.1 and additional GNA if any shall form the basis for raising the bill under CERC Sharing Regulations, 2020. In this regards charging ISTS charges against LTA RE power is almost not in-line with CERC, Sharing Regulations principle and Govt. of India policy of waiver of Transmission charges & losses for power source by DISCOM from RE source to meet its RPO obligation.</p> <p>Further, it is submitted that MSEDCL has executed its long term power purchase agreement with interstate RE generators through competitive bidding and the delivery point is state periphery and as per the MoP guidelines, due to waiver of transmission charges for RE power, the RE generators have not considered the loading of transmission charges in the tariff. The inclusion of RE component in calculation of GNA and same is considered for computation of interstate transmission charges as per Sharing Regulations,2020, will create dispute between buyer and sellers and increases litigations in future.</p> <p>Hence it is suggested to grant deemed GNA to each state equivalent to its Sum of Conventional LTA/MTOA and RE LTA / MTOA and out of this only Conventional LTA/MTOA component of deemed GNA shall form the basis for raising bills under CERC Sharing Regulations,2020.</p>
18 Deemed Grant of GNA	(c) GNA for a State including intra-State entity (ies) as per clause b of this Regulation shall be deemed to have granted to STU of that State on behalf of such intra-State entities and remain valid until relinquished in accordance with these Regulations	<p>It is suggested that the Distribution Licensees shall be provided with sufficient time for downward revision of allocation of deemed GNA if any under these Regulations up to their non-RE LTA quantum. It is requested to add the following phrase in Clause 18.1 (c)</p> <p><i>(c)GNA for a State including intra-State entity (ies) as per clause b of this Regulation shall be deemed to have granted to STU of that State on behalf of such intra-State entities and the intra-State entities shall be provided a time period of three months from the notification of these Regulation for downward revision of notified GNA up to the sum of Conventional LTA and RE LTA quantum of the Distribution Licensee and it shall remain valid until relinquished in accordance with these Regulations</i></p>
18 Deemed Grant	18.1 (e) GNA deemed to have been granted to STU	The methodology for segregation of GNA allocated to state to embedded

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of GNA	<p>under clause(d) of this Regulation, shall be segregated for each intra-State entity, including distribution licensee, by the respective SLDC, and intimated to STU, Nodal Agency and NLDC within 1 month of publication of details by the Nodal Agency under clause (d) of this Regulation.</p> <p>Provided that in case an SLDC fails to provide such segregation, the pro rata GNA shall be allocated to each intra-State entity in the ratio of their Long Term Access and Medium Term Open Access, as included in the first bill raised in the previous month under the Sharing Regulations.</p>	<p>State Entities (Incl Dist Licensees) shall be provided in this regulation, in order to have similar methodology being used by all states. As per the draft if SLDC fails to provide such segregation, the pro rata GNA shall be allocated to each intra-State entity in the ratio of their Long Term Access and Medium Term Open Access.</p> <p>MSEDCL would like to submit that for the state of Maharashtra currently only MSEDCL has LTA at inter-state level while other utilities like BEST, AEML-D and TPC-D have no existing LTA at inter-state level. However, utilities such as BEST, AEML-D and TPC-D procure power through exchange at state periphery and therefore the same is reflected in the drawl of the State, which will be the deemed GNA of State as per the fraft regulations. Due to the failure of SLDC to segregate the GNA, based on pro rate basis of LTOA/MTOA the additional drawl of these utilities may also be assigned to MSEDCL since other utilities don't have existing LTA at inter-state level and thereby leading to increase in transmission charges of MSEDCL</p> <p>Illustration 1:</p> <table><tr><th>Particulars</th><th>MSEDCL</th><th>AEML-D</th><th>TPC-D</th><th>BEST</th><th>Total</th></tr><tr><td>Drawl at ISTS (MW)</td><td>8000</td><td>300</td><td>300</td><td>300</td><td>8900 (Deemed GNA of State)</td></tr><tr><td>Existing LTA (MW)</td><td>7500</td><td>-</td><td>-</td><td>-</td><td>7500</td></tr></table> <p>As seen from the above illustration, MSEDCL being the only Utility with LTA of 7500 MW, the entire GNA for drawl of 8900 MW will be allocated to MSEDCL in case SLDC fails to provide segregation of GNA for intra-state utilities.</p> <p>It is therefore requested that the proviso of clause 18.1 (e) may be deleted and it shall be made mandatory for SLDC to submit the segregation of GNA for each intra-state entity to the STU, Nodal Agency and NLDC within the</p>	Particulars	MSEDCL	AEML-D	TPC-D	BEST	Total	Drawl at ISTS (MW)	8000	300	300	300	8900 (Deemed GNA of State)	Existing LTA (MW)	7500	-	-	-	7500
Particulars	MSEDCL	AEML-D	TPC-D	BEST	Total															
Drawl at ISTS (MW)	8000	300	300	300	8900 (Deemed GNA of State)															
Existing LTA (MW)	7500	-	-	-	7500															

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		<p>specified time frame and for this purpose detailed procedure should be specified in regulations itself so that there will be same methodology for all the states</p> <p>However if deemed GNA is limited to LTA/MTOA of state as proposed in comments/suggestion against Regulation 18.1(c), then allocation of deemed GNA can be done as per respective DISCOM's ISTS LTA/MTOA and only Conventional LTA/MTOA component of deemed GNA shall form the basis for raising bills under CERC Sharing Regulations,2020 .</p>
18. Deemed Grant of GNA	18.1.(g) The Central generating stations which are connected to the grid and have not been granted Long term Access under the Connectivity Regulations but whose power is allocated by the Ministry of Power, shall be deemed to have been granted GNA equal to the installed capacity of such generating station(s).	<p>Instead of granting GNA as per installed capacity, same shall be as per maximum exportable Capacity into ISTS Grid , as all beneficiaries of power will get maximum power only to tune of Maximum exportable capacity of said generating station/units.</p>
19 Application for Grant of additional GNA by STU	19.1 Within 3 months of coming into force of these regulations, STU may, on behalf of intra-State entities including distribution licensees, apply for additional GNA over and above the GNA deemed to have been granted under clauses (a) to (e) of Regulation 18.1 of these regulations, with entity-wise segregation indicating GNA within the region and from outside the region	<p>In case, STU request for additional GNA then same shall be based on request from individual state Distribution licensee, as POC charges will be based on GNA for each Distribution licensee. The STU while requesting for additional GNA will take into consideration injection of state entities into ISTS Grid.</p> <p>Based on approved GNA, CTU will prepare Transmission scheme for up-gradation of the state corridor. This will increase POC charges of Distribution licensee having Long term/medium term contract.</p> <p>In case of Maharashtra, MSEDCL is having major Long term contract from conventional sources with about 7000 MW LTA out of total Conventional LTA of 7103MW. Other state DISCOMs like TATA power, Adani Electricity Mumbai Ltd, BEST are taking power only under short term basis through ISTS.</p> <p>Being GNA will play important role in development of ISTS network, it is necessary that such short term availing DISCOM to share GNA for power they will avail through short term market.</p> <p>Further it is suggested that there should be some limitation on the time period for applying for GNA over and above the deemed GNA to be granted under Regulation 18.1. Approval for additional GNA may be sought immediately from the date of effect of this Regulations and depending on the requirements of the Licensees. Hence the condition for applying for additional GNA only after 3 months may be deleted.</p>

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19 Application for Grant of additional GNA by STU	19.2 STU, on behalf of intra-State entities including distribution licensees, may apply, once in a financial year (starting from the financial year following the financial year in which these regulations have become effective) by the month of September each year, for additional GNA for the next 3 (three) financial years, with entity-wise segregation indicating GNA within the region and from outside the region, as stipulated in the Detailed Procedure for Connectivity and GNA issued in accordance with Regulation 39.1	The option to apply for additional GNA may be allowed on seasonality basis (i.e. at least three times a year) since variation in demand is majorly due to seasonality changes. Further, the period for applying for additional GNA can be kept in the range from one year to three years. It is submitted that providing flexible options to STU/Licensee for applying to additional GNA and period of GNA would help in better planning and cost optimization.
20. Application for Grant of GNA by entities other than STU	20.1. Entities covered under clauses (ii) and (iii) of Regulation 17.1 of these regulations, indicating bifurcation of GNA within the region and outside the region, may apply for GNA from a specified date, for a specified quantum, and for a specified period of not less than eleven months. 20.2. Entities covered under Regulation 17.1(iv) of these regulations, may apply separately for GNA for injection into Indian grid or drawl from Indian grid, for a specified quantum, and for a specified period of not less than eleven months.	The minimum time period of 11 months for which shall be considered only if, there is no need for any additional infrastructure or augmentation of ISTS and GNA can be granted under Regulation 22.2 .b(i). However in case, there is need for additional infrastructure or Augmentation, then minimum time period shall be such that it will recover cost of infrastructure created and same will not become idle once that GNA period is lapsed. Otherwise, such idle infrastructure will burden other entities with additional POC charges.
22. Grant of GNA	22.1 (d) Intra-State entity-wise GNA deemed to have been granted to STU under Regulation 19.1 and additional GNA granted under this Regulation shall form the basis for raising the bills under the Sharing Regulations to such intra-State entities.	It is requested to revise the clause 22.1 (d) as per the following <i>(d) Intra-State entity-wise GNA deemed to have been granted to STU under Conventional LTA/MTOA under Regulation 19.1 and additional GNA for Conventional LTA/MTOA granted under this Regulation shall form the basis for raising the bills under the Sharing Regulations to such intra-State entities.</i>
22 Grant of GNA to entities other than STU	22.2 (b) The Nodal Agency shall grant GNA to entities covered under clauses (ii) to (iv) of Regulation 17.1 specifying start date of GNA, as per the following timeline: (i) where GNA is granted on the existing system: by the end of the month subsequent to the month in which	It is requested to reduce the time line for granting GNA to entities where augmentation of transmission system is required, to a period of 90 days from the proposed 180 days from the date of application.

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	application complete in all respects has been received; (ii) where augmentation of transmission system is required: within 180 days from the end of the month in which application complete in all respects has been received:.	
22. Grant of GNA to entities other than STU	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. In case, such charges are not furnished by the entity 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 one time GNA charge shall be used for reducing Monthly Transmission Charges under the Sharing Regulations.	It is suggested that instead of encashment of BGs (which are taken for different purpose), if concern Entity fails to submit one time GNA charges (one Lakh per MW), then said Entity shall not be allowed to connect to Grid. In case, said Entity is already connected to Grid, it shall not be allowed to schedule power against its sanction GNA till it pays one time GNA charges. Further, it may please be clarify, whether Generating companies which have granted Connectivity as per CERC Connectivity Regulation earlier & for whom deemed GNA is given, needs to pays this “One Time GNA” Charges or otherwise.
23 Use of GNA by other GNA grantee(s)	23.1. An entity covered under Regulation 17.1 which is a GNA grantee, may authorise other entities covered under Regulation 17.1 which are GNA grantee(s), to use its GNA, in full or in part, with prior approval of the Nodal Agency, for a period not exceeding 1 (one) year at a time on mutually agreed terms and conditions: Provided that payment liability for transmission charges shall continue to be with the original GNA grantee that authorised its GNA to be used by other GNA grantee(s):	It is a welcome move to allow GNA grantee to authorise other GNA grantees to use its GNA, in full or in part, with prior approval of the Nodal Agency. However, in the proviso of the said clause it is mentioned that the payment liability for transmission charges shall continue to be with the original GNA grantee. It is submitted that payment liability for transmission charges shall also be transferred to the GNA grantee who is utilising the GNA. As mentioned in the clause 23.1, GNA can only to transferred to other GNA grantees which are eligible under Regulation 17.1. Hence, the Nodal agency shall have all the payment security mechanism in place for the other GNA grantee to whom the GNA is transferred by original GNA grantee. Hence there is no point in keeping the payment liability of transmission charges with the original GNA grantee if the rights to use the GNA are already transferred to other GNA grantee. This would also streamline the payment mechanism.
24. Relinquishment of connectivity	24.4 In case of revocation of Connectivity or relinquishment of Connectivity, corresponding GNA shall be reduced. In case a Connectivity grantee relinquishes the Connectivity in full, it shall be	It is mentioned that “ <i>in case of revocation/relinquishment of connectivity, corresponding GNA will be reduced</i> ”. This in other words means relinquishment of mainly GNA. If only BGs are forfeited against surrender of connectivity then there will be tendency to surrender connectivity only &

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	disconnected from the ISTS from the date of relinquishment of Connectivity.	concerned entity will automatically get out of liability of Transmission changes associated with said connectivity or GNA. Hence it is suggested that as per regulation of 25.1 & 25.1, relinquishment charges shall be recovered along with surrender of connectivity in addition to forfeiting BGs.
25 Relinquishment of GNA	25.1. For an entity covered under Regulation 17.1, GNA once granted can be relinquished, in full or in part, on payment of relinquishment charges in advance as per following: (a) For an entity covered under clause (i) of Regulation 17.1 of these regulations, STU may relinquish GNA on behalf of identified intra-State entity. The relinquishment charges shall be equal to 60 times the transmission charges paid by such intra-State entity for the last billing month under the Sharing Regulations, corresponding to the relinquished quantum.	It is submitted that in an event of expiring of any PPA of the Distribution Licensee with the generator, the quantum of which is already part of deemed GNA, then in such case such quantum shall automatically get relinquished from the total deemed GNA without any relinquishment charges to be applied for the Distribution Licensee. It is requested to kindly insert provision stating the above submission in the relevant clause. Further, the relinquishment charges shall be made applicable on the transmission charges paid by the GNA grantee for the average of last 12 months instead of the last billing month. This would ensure that sufficient charges are recovered in case the last billing month falls in off-peak period.
26 Eligibility for Temporary GNA	26.1 The following entities shall be eligible as Applicants to apply for T-GNA to ISTS: (a) As buyers, (i) Distribution licensee directly connected to ISTS; (ii) Bulk consumer directly connected to ISTS; (iii) A buying entity connected to intra-State transmission system; (iv) Generating station including Renewable Energy Generating Station for meeting its auxiliary consumption or start-up power or for meeting its supply obligations in terms of clause (3) of Regulation 6 of the Power Market Regulations; (v) Captive generating plant; (vi) Standalone ESS	It is requested to clarify whether distribution licensees connected to intra-state transmission system are covered under clause 26.1 (iii) or not. If intra-state entities are not covered under Clause 26.1 (iii) then such entities shall be additionally included in Clause 26.1 so that they can also be eligible as applicant for T-GNA. As per draft regulation 26.1 (iv) generation stations are eligible for T-GNA. It is suggested that the Generators shall not be allowed to use TGNA or permanent GNA for meeting its Auxiliary consumption. This will leads to violation of CEA(metering Regulation) . The interface point metering will be affected. The commercial complication will arise due to factor of change in Law for Generators having Long term/medium Term PPA. The generators shall be allowed to have GNA or connectivity only upto its exportable Capacity i.e Maximum Installed capacity minus Normative Auxiliary consumption.
28 Application for grant of T-GNA	28.5 (vii) In case the seller is an intra-State entity and the point of injection is available, Standing Clearance of SLDC under whose jurisdiction the point of	It is submitted that at the time of application in case the point of injection is not known or it cannot be determined that the point of injections falls under whose jurisdiction, then such applications shall not be entertained by the

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	<p>injection is located: Provided that in case the point of injection and corresponding Standing Clearance of SLDC under whose jurisdiction the point of injection is located is not available at the time of making the application, the same shall be submitted along with the scheduling request in terms of Regulation 33 of these regulations; (viii) In case the seller is a regional entity and the point of injection is not available at the time of making the application, the point of injection shall be submitted along with the scheduling request in terms of Regulation 33 of these regulations.</p>	<p>Nodal agency. It is submitted that only those applicants with valid contracts only shall be eligible for such application. Hence it is suggested that the proviso for sub-clause (vii) & (viii) of Clause 28.5 of the draft Regulation is to be deleted.</p>
28. Application for grant of T-GNA	<p>28.6.(d) That there is a valid contract for the proposed scheduling: Provided that in case of Advance application for T-GNA, the declaration that there is a valid contract for the proposed scheduling shall be submitted, if not already submitted at the time of making application for T-GNA, along with the scheduling request in terms of Regulation 33 of these regulations.</p>	<p>It is suggested that the consent of Buyer and Seller shall be obtained along with application and valid contract. Provision for same shall be made in NOAR software, as buyer has to make payment toward energy scheduled to it. This will avoid any commercial complication arise in future due to scheduling of power.</p>
28 Application for grant of T-GNA	<p>28.8 The application fees in case of rejection of application for T-GNA shall be forfeited</p>	<p>It is submitted that granting of T-GNA depends on various factors as mentioned in these Regulations including network availability, verification of Nodal Agency and priority to GNA grantees over T-GNA. Therefore, in case of rejection of application for T-GNA, it would not be appropriate to forfeit the application fees of T-GNA as allocation of the same is not entirely in the hands of the applicant. The application fees shall therefore be refunded to the applicant in such case.</p>
31 Standing Clearance for grant of T-GNA	<p>31.4 The T-GNA Grantee to whom the Standing Clearance has been issued in terms of Regulation 31.2 or deemed to have been issued in terms of Regulation 31.3, shall bid in the power exchange(s) in such a manner that the aggregate quantum in each time block</p>	<p>It is submitted that for any quantum exceeding the standing clearance, the Nodal Agency shall curtail the quantum to the extent of the standing clearance provided to the Licensee. Under no condition the aggregate quantum in each time block for all the bid(s) shall exceed the quantum of Standing Clearance allowed to the GNA grantee. All such transactions which</p>

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	<p>for all the bid(s) under bilateral transactions and collective transactions shall not exceed the quantum of Standing Clearance: Provided that if the aggregate quantum of bid(s) in the power exchange(s) under bilateral transactions and collective transactions by a T-GNA grantee exceeds the quantum of the Standing Clearance in any time block, NLDC shall debar such T-GNA grantee from participating in bilateral and collective transactions for a period of seven (7) days under intimation to the concerned SLDC</p>	<p>are exceeding the standing clearance shall automatically be curtailed. A system shall be put in place in National Open Access Registry (NOAR) so that such transactions cannot go through. The NOAR is software based webportal, hence once standing clearance is granted for T-GNA , it shall be linked to scheduling software of all RLDC. The scheduling software needs to take care of the aspect that T-GNA grantee is not scheduling above its T-GNA in any time block.</p> <p>Or otherwise, NLDC (Nodal Agency) needs to publish report every month after checking that Power scheduled under T-GNA by concerned Grantee from all RLDC is not exceeding its approved T-GNA. This will allows effective implementation of Regulation and avoid any T-GNA grantee scheduling power more than its approved corridor.</p> <p>Accordingly, it is submitted that the clause for debarment may be deleted. Hence the aforesaid clause may be modified.</p>
32 Revision of T-GNA	<p>32.1 T-GNA granted under Exigency application category or under Advance application category for a period not exceeding one month cannot be revised</p> <p>32.2 T-GNA granted under Advance application category for a period of more than one month may be reduced for the balance period with a prior notice of one (1) month by the T-GNA grantee:</p> <p>Provided that applicable T-GNA charges for the quantum of T-GNA granted shall be payable for the notice period of one (1) month.</p>	<p>It is submitted that the existing provisions of Regulation 14 of Open Access Regulation 2008 amended from time to time provides for revision of short term open access after a period of expiry of minimum two days. Hence it is therefore requested to retain the existing provisions and provide for revision of T-GNA under advance application category after a minimum period of three days including the date of application.</p> <p>It is further submitted that T-GNA under advance application are applied for a very short/brief period to respond to unexpected emergency situations. Hence it would not be appropriate to levy the charges of T-GNA for an entire month if the requirement is only for a few days. Further Regulation 14 (2) of the existing Open Access Regulation 2008 amended from time to time provides for the following clause</p> <p><i>2) The person seeking cancellation or download revision of short term open access schedule shall pay the transmission charges for the first two days of the period for which the cancellation or downward revision of schedule as the case may be has been sought.</i></p> <p>It is therefore requested to accordingly modify the said clause by allowing the transmission charges to be paid for T-GNA only for first two days from</p>

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		the date of revision of T-GNA and reimburse the balance transmission charges corresponding to the difference between the original quantum and revised quantum for the downward revision period.
33 Scheduling request for power under T-GNA	33.1. Advance application category: (a) Scheduling request by T-GNA grantees under Advance application category shall be made on day ahead basis before the opening of bidding window for collective transactions under day ahead market, as per provisions of the Grid Code	<p>It is submitted that the procedure for scheduling of power on day ahead basis for T-GNA may clearly be specified in the draft Regulation with detailed elaboration. It is requested to provide the procedure for schedule to be provided by buyer and/or seller and their respective timelines.</p> <p>It is suggested that T-GNA granted under advance application category shall be considered as initial (zero revision) schedule for the seller which cannot be revised except the provisions specified in Grid Code. However, the buyer can revise the T-GNA schedule for that seller on daily basis. Accordingly, the clause 33.1 may be modified.</p> <p><i>(a) T-GNA granted under Advance application category shall be considered as initial schedule (zero revision) for seller, which cannot be revised except for the provisions specified in Grid Code.</i></p> <p><i>However, Scheduling request by T-GNA grantees under Advance application category shall be made on day ahead basis before the opening of bidding window for collective transactions under day ahead market, as per provisions of the Grid Code</i></p>
33 Scheduling request for power under T-GNA	33.1. Advance application category: (d) The scheduling request shall be accompanied by a declaration that there is a valid contract, in terms of Proviso to clause (d) of Regulation 28.6 of these regulations.	<p>It is suggested that instead of declaration by buyer or seller regarding valid contract, in case bilateral power scheduling, both buyer and seller shall be involved in application process of scheduling request in NOAR system. It is suggested that the consent of Buyer and Seller shall be obtained along with application and valid contract in NOAR system. This will avoid any commercial complication arise in future</p>
34 Transmission charges for T-GNA	34.2 Transmission charges for T-GNA, in case of bilateral and collective transactions, shall be payable only at point of drawal, as per the last published Transmission charge rate for T-GNA for the State where such point of drawal is located	<p>It is not cleared whether Dist. Licensee with GNA, if schedule power under collective Transaction against its balance GNA, will required to pay T-GNA Transmission charges. As per CERC(Sharing of T/X charges) Regulation 2020, Dist. Licensee having LTA is not required to pay for Transmission charges for Power scheduled under short term. The relevant clause is reproduced as under:</p> <p><i>11.(5) No transmission charges for Short Term Open Access for inter-State transmission system, shall be payable by a distribution</i></p>

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		<p><i>licensee which has Long Term Access or Medium Term Open Access or both, or by a trading licensee acting on behalf of such distribution licensee: Provided that other charges or fees as per Open Access Regulations, 2008 and the Transmission Deviation charges, if any, as per these regulations shall be payable.</i></p> <p>For example. In Maharashtra, suppose MSEDCL has LTA of 7000MW and if we consider GNA of 7000MW, then on particular time block of a day, MSEDCL schedule only 6000MW from its Long term contracted sources and schedule 800MW from Market through bilateral/collective transactions, then will MSEDCL required to pay for T-GNA of 800MW or otherwise. This needs to be clarify.</p> <p>Further it is suggested that distribution licensee with existing long or medium term access or both and having deemed GNA granted under Clause 17.1 of the draft Regulations, may not be charged T-GNA transmission charges for collective and bilateral transactions.</p>
34 Transmission charges for T-GNA	<p>34.4. Payment of transmission charges for T-GNA</p> <p>(a) Transmission charges for T-GNA under Advance application category shall be deposited by the T-GNA grantee with the Nodal Agency as under:</p> <p>(i) For T-GNA up to one (1) month - within three (3) working days of grant of T-GNA:</p> <p><i>Provided that where T-GNA is starting within next 3 working days, transmission charges for T-GNA shall be deposited before the start date of T-GNA;</i></p> <p>(ii) For T-GNA for more than 1 month - charges for the first month, within three (3) working days of grant of T-GNA but before the start date of T-GNA and charges for each subsequent month including part thereof, if any, on rolling basis, one month in advance.</p>	<p>As per the existing procedure of short term open access application, the transmission charges will be paid by applicant within three days from the date of approval of open access, hence it is suggested to continue the same in this proposed regulation and suggested to delete the provision falling under Clause 34.4 (a) (i) as</p> <p><i>Provided that where T-GNA is starting within next 3 working days, transmission charges for T-GNA shall be deposited before the start date of T-GNA;</i></p>
34 Transmission charges for T-GNA	<p>34.4 (b) Transmission charges for T-GNA under Exigency application category shall be deposited along with the application. In case the Exigency application is approved for part of applied quantum or part of</p>	<p>It is submitted that applying for T-GNA under exigency application is a very hasty decision and only arise in unexpected and emergency situations. Under such situations, it would be difficult for the T-GNA grantee to deposit the transmission charges upfront in advance at the time of application. Further,</p>

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	applied period is rejected, the corresponding transmission charges shall be returned by the next day from the date of approval	in case of government entities, the authorisation for deposition of transmission charges may not be available with the operational staff who is responsible for submitting the application for T-GNA. Also, such application may not be necessarily placed only during office hours. Hence, it is requested that the transmission charges may not be deposit upfront in advance for such applications. The T-GNA grantee shall pay the transmission charges only within three days from the date of approval of T-GNA under such exigency application. It is requested to therefore modify the clause 34.4 (b) accordingly.
34 Transmission charges for T-GNA	(d) In case any scheduling request under T-GNA is not approved by RLDC on day ahead basis or curtailed for the reasons of transmission constraints or grid security, the transmission charges for such quantum not scheduled or curtailed shall be refunded to the T-GNA grantee. Provided that non-availability of Standing Clearance shall not be treated as constraint in transmission system.	It is suggested that a proviso to clause 34.4 (d) shall be added stating that in case SLDC declares that the Standing clearance is not available due to transmission constraint then the same shall be treated as constraint in the transmission system and accordingly charges for T-GNA shall be refunded.
Additional Submission	Additional Submission	It is submitted that the CERC Sharing Regulation 2020 provides for reimbursement of short term open access transmission charges to the DICs in proportion of their share in first bill in the following billing months. The relevant clause in CERC Sharing Regulations 2020 is reproduced as below. <i>(6) Transmission charges for Short Term Open Access collected in a billing month, after adjustment as per Clauses (3) and (4) of this Regulation, shall be reimbursed to the DICs in proportion to their share in the first bill in the following billing month.</i> It is therefore requested to kindly add the said clause under Clause 34.4 (b) of the draft Regulation which is in line with the CERC Sharing Regulations 2020.
36 Allocation of Transmission corridor	36.1 GNA grantee shall be eligible to schedule power within the GNA granted to it under any contract subject to conditions specified in the Grid Code	It is suggested to consider that under this clause the GNA grantee shall be able to schedule any contract such as (long term/medium term/short term) power including bilateral and collective transactions as far as it is within the total quantum of GNA allotted (i.e. sum of deemed GNA and additional

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		GNA if any).
Additional Submission	Additional Submission	It is submitted that during any time block if the deemed GNA is available and not fully utilised by the GNA grantee for its long term purchase of power then in such case, the balance available deemed GNA shall be first utilised for short term bilateral and collective transactions and accordingly for such time blocks the charges for T-GNA may not be levied since for the aforesaid time blocks T-GNA availed was never utilised by the GNA grantee for its short term purchases.
Additional Submission	Additional Submission	As submitted in Annexure-I of these Regulations the average GNA for Maharashtra has worked out to be 8496 MW. Before implementation of the above Regulation, Hon'ble CERC is requested to kindly clarify the impact of GNA of such derived quantum in Annexure -1 with respect to the existing transmission charges that are being paid by each Discom. Also Hon'ble CERC is requested to allow states to modify its own deemed GNA as per the requirement limited to the approved LTA+MTOA.
Additional Submission	Additional Submission	It is requested to kindly provide the definition of 'Renewable Park' in these draft Regulations stating the minimum capacity for development of a renewable park which can be directly connected to ISTS system.