



RAJASTHAN RAJYA VIDYUT PRASARAN NIGAM LIMITED

(An ISO 9001:2008 Certified Company)

[Corporate Identity Number (CIN) No. L40109RJ2000SGC016485]

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No.RVPN/ CE/SE(NPP&RA)/XEN(NPP-3)/F. / D.

1128 Dt: 15/2/22

**The Secretary,
Central Electricity Regulatory Commission
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Sub: Comments/ Suggestions/Objections on Draft CERC (Connectivity and General Network Access to the inter-state Transmission System) Regulation'2021

On the above cited subject, please find enclosed herewith comments of RVPN and Rajasthan SLDC on Draft CERC (Connectivity and General Network Access to the inter-state Transmission System) Regulation'2021

Encl: as above

**(K.K.Meena)
Chief Engineer (NPP&RA)**

Copy to the following for kind information and necessary action:-

1. The Chief Engineer (LD) RVPN Jaipur.

Chief Engineer (NPP&RA)

Comments of Rajasthan Vidyut Prasaran Nigam and Rajasthan SLDC on Draft of Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021.

Reg. No.	Draft Regulation	Comments of RVPN and SLDC, Rajasthan
17.1 (iii)	A distribution licensee or a Bulk consumer, seeking to connect to ISTS, directly, with a load of 50 MW and above;	<p>a) As per Reg. 4.1 of these Regulations the distribution licensee or Bulk consumers are not in the eligibility criteria.</p> <p>b) Only deemed licensee may be allowed to connect directly to ISTS not distribution licensee or a Bulk consumer because it will affect the State commercial interests.</p> <p>Bulk consumer shall not be eligible as Applicant for grant of GNA or for enhancement of the quantum of GNA directly. Clause 42(2) of EA 2003 states that the State Commission shall introduce open access in such phases and subject to such conditions, (including the cross subsidies and other operational constraints) as may be specified within one year of the appointed date by it and in specifying the extent of open access in successive phases and in determining the charges for wheeling, it shall have due regards to all relevant factors including such cross subsidies and other operational constraints.</p> <p>In case of Renewable rich state where requirement of power from interstate resources vary quite substantially GNA has been fixed for the complete year based on last three years data, whereas the seasonal variations can only be captured if GNA for the state is considered month wise / quarter wise.</p> <p>If the LTA/MTOA is supposed to be replaced by GNA and the methodology for computation of GNA is based on total ISTS drawl than both are seems to be contradictory to each other. The total ISTS drawl having LTA/MTOA and STOA and GNA shown in the Annexure –I for the state is quite high as compared to existing quantum of LTA and MTOA of the state.</p>
18.1 (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: where, „A“ = {0.5 X maximum ISTS drawal in a time block during the year} + {0.5 X [average of (maximum ISTS drawal in a time block in a day)	

during the year]]

Therefore the methodology for computing GNA need to be reviewed.

18.1 (c)	GNA for a State including intra-State entity(ies) as per clause (b) of this Regulation shall be deemed to have been granted to STU of that State on behalf of such intra-State entities and shall remain valid until relinquished in accordance with these regulations	In case GNA quantum shown in the Annexure -I for the state is more than the total quantum of LTA and MTOA of the state then the deemed GNA shall be upto the limit of sum of LTA and MTOA of the state or state may opt the GNA quantum upto the limit prescribed in the Annexure-I. The balance GNA may be considered deemed surrendered by the state.
25.1 (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.	In case GNA quantum shown in the Annexure -I for the state is more than the total quantum of LTA and MTOA of the state and state surrender their GNA quantum to determine their initial deemed GNA quantum than in that case there should not be any relinquishment charges since state has not agreed with the GNA calculated in the Annexure-I. Once the deemed GNA quantum has been agreed by the state than only this clause shall be made applicable. The relinquishment charges equal to 60 times the transmission charges paid by intra state entity for the last billing month appear to be very high because this relinquished capacity may be used by other states or entities.
28.1	T-GNA may be applied for any period from 1 (one) time block and up to 11 (eleven) months	The period for granting T-GNA is quite long. It may be limit upto 3 months because in such a long period some changes in intra state Transmission system parameters may occur for which standing clearance has been issued by SLDC. If entity wants to continue with T-GNA then entity may apply again for another period alongwith fresh application.
28.6 (d)	That there is a valid contract for the proposed scheduling: Provided that in case of Advance application for T-GNA, the	The valid contract may also be included as a part of advance application/ or any other undertaking because if applicant got the advance T-GNA and unable to furnish the valid contract at the time of scheduling than capacity will be blocked and other applicants T-GNA may get denied due to ATC limitations.

	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.	The penalty provision should be there in case applicant fails to furnish the valid contract.
29.1	T-GNA shall be granted within the available transfer capability (ATC) on the ISTS after accounting for GNA of the GNA grantees.	ATC limit should not be considered as a parameter of restriction instead the quantum of T-GNA should be made linked to scheduling procedure. Reason being, in case state does not schedule up to the capacity of approved GNA which is quite likely scenario than total transmission capacity will not be fully utilized. Further, allocation of T-GNA on and over this unutilized capacity of GNA will lead to loss of transmission charges.
		In present conditions, the margins for STOA are being computed considering 80% of the total LTA/ MTOA capacity. Therefore, in this case the T-GNA margin may also be allocated in the same way.
34.4 (c)	Provided that the transmission charges for T-GNA for use of intra-State transmission system shall be settled directly by the power exchange with respective State Load Despatch Centre.	The Transmission charges may be settled directly by the power exchange to STU. The operating charges are missing which may be directly settled by the power exchange to SLDC.
		In case of Bilateral Transaction the aforesaid charges for the use of Intra state Transmission network shall be settled directly by Nodal agency to STU & SLDC respectively.
40.1	The transmission charges and losses for use of the inter-State transmission system shall be shared among buying entities of ISTS in accordance with the Sharing Regulations	According to CERC (Sharing of Transmission Charges and losses) Regulations, 2020 transmission charges are to be borne by buying entities and untied generating entities whereas in GNA regulations transmission charges are to be borne only by buying entity. Therefore, CERC (Sharing of Transmission Charges and losses) Regulations, 2020 needs to be amended in this regard.