CIN No. : L26943RJ1979PLC001935
Phone : 01462 228101-6
Toll Free : 1800 180 6003 / 6004
Fax : 01462 228117 / 228119
E-Mail : shreebwr@shreecement.com
Website : www.shreecement.com

SHREE CEMENT LTD.

An ISO 9001, 14001, 45001 & 50001 Certified Company

Regd. Office:
BANGUR NAGAR, POST BOX NO.33, BEAWAR 305901, RAJASTHAN, INDIA

Ref: SCL/JPR/CERC/1026

07th January, 2022

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

Sub: Comments on the Draft CERC (Connectivity and General Network Access to the inter-state Transmission System) Regulations, 2021

Dear Sir,

Attached please find herewith our comments/ suggestions on Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-state Transmission System) Regulations, 2021 marked as Annexure-1, for kind consideration of the Hon'ble Commission.

Further, we would like to request the Hon'ble Commission to grant us an opportunity of hearing in the matter to enable us to present our views in person or through video conferencing and to make addition at submissions, if any, at the time of hearing.

Thanking You.

For Shree Cement Limited

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(Amarjit Singh)
Joint Vice President – Power Business

Encl.: As above

Annexure -1 Comments on Draft CERC (Connectivity and General Network Access to the inter-state Transmission System) Regulations, 2021

S. No.	Draft Regulation	Draft Regulation with Proposed Amendment	Justification/ Comments
1.	**Clause 4.1. (b)** Captive generating plant with capacity for injection to ISTS of 50 MW and above	**Clause 4.1. (b)** Captive generating plant/plants **<u>together with their captive load either at single location or multiple locations connected through dedicated feeder, seeking connectivity at a single point</u>**, with capacity for injection to ISTS of 50 MW and above.	Most of the Captive Power Plants are embedded in the electrical system Manufacturing facility and thus the defination should be comprehensive enough to cover the entire facility in which Captive Power Plant is situated. This is required to eliminate any narrow interpretation at a future point of time. We are having Captive generating plant at two premises which are at a distance of 30 KM but are connected through a dedicated feeder, thus forming a single electrical system. Thus two such locations should be considered as single electrical

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			system for connectivity. Such a proposed amendment is required to eliminate any ambiguity.
2.	**Clause 4.3.** A generating station, already connected to or intending to connect to intra-State transmission system shall also be eligible as an Applicant for Connectivity.	**Clause 4.3.** A generating station/**Captive Generating Station(s)**, already connected to or intending to connect to intra-State transmission system shall also be eligible as an Applicant for Connectivity.	Proposed amendment is in line with the spirit of draft Regulations.
	Clause 5.1 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: Provided that if such an Applicant already has Connectivity to intraState 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; Provided further that if such an Applicant is a Renewable Hybrid Generating Station, it	**Clause 5.1** 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: Provided that if such an Applicant already has Connectivity to intraState 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; 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;	We are having two generators, One is connected to ISTS and other being a Captive Generating plant connected with the Intra State Transmission System. Proposed amended will allow us to combined the generators as single generator with Captive Generating plant status. Therefore, the proposed amendment should be allowed.

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	may apply for grant of Connectivity for a quantum less than or equal to the installed capacity.	**Provided also that a generating company connected to ISTS can apply for connectivity of additional generating plant including Captive generating plant already connected to Intra state transmission system with ISTS.**	
3.	**Clause 5.3.** An Applicant, which is a captive generating plant, shall apply for grant of Connectivity for a quantum of its proposed maximum injection to ISTS.	**Clause 5.3.** An Applicant, which is a captive generating plant, shall apply for grant of Connectivity for a quantum of its proposed maximum injection to **as well as maximum drawal from ISTS, with either of its happening in a time block.**	As most of the Captive Generation Plants are embedded in the electrical system of a Manufacturing facility, there might be a situation when the manufacturing facility may be required to draw power owing to outage of CPPs.
4.	**Clause 5.6.** An Applicant may apply for grant of Connectivity at (i) a terminal bay of an ISTS sub-station already allocated to another Connectivity grantee or (ii) switchyard of a generating station having Connectivity to ISTS, with an agreement duly signed between the Applicant and the said Connectivity grantee or	**Clause 5.6.** An Applicant may apply for grant of Connectivity at (i) a terminal bay of an ISTS sub-station already allocated to another Connectivity grantee or (ii) switchyard of a generating station/**Captive Generating Station(s)** having Connectivity to ISTS, with an agreement duly signed between the Applicant and the said Connectivity grantee or the generating station having	Proposed amendment is in line with the spirit of draft Regulations.

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	the generating station having Connectivity to ISTS, as the case may be, for sharing the terminal bay or the switchyard and the dedicated transmission lines, if any. The applicable Connectivity Bank Guarantee as per Regulation 8 of these regulations shall be submitted by such Applicant.	Connectivity to ISTS, as the case may be, for sharing the terminal bay or the switchyard and the dedicated transmission lines, if any. The applicable Connectivity Bank Guarantee as per Regulation 8 of these regulations shall be submitted by such Applicant.	
5.	**Clause 10.6.** In case of failure to sign the Connectivity Agreement by the entity that has been intimated final grant of Connectivity, as required under Regulation 10.3, the Nodal Agency may extend the time for signing the Connectivity Agreement for a maximum period **of 30 days**, failing which the final grant of connectivity shall be revoked by the Nodal Agency under intimation to the Applicant, and the Conn-BG1, Conn-BG2 and Conn-BG3 shall be encashed.	**Clause 10.6.** In case of failure to sign the Connectivity Agreement by the entity that has been intimated final grant of Connectivity, as required under Regulation 10.3, the Nodal Agency may extend the time for signing the Connectivity Agreement for a maximum period of **90 days**, failing which the final grant of connectivity shall be revoked by the Nodal Agency under intimation to the Applicant, and the Conn-BG1, Conn-BG2 and Conn-BG3 shall be encashed.	Sufficient time should be allowed while extending the time-frame for execution of the Connectivity Agreement.
6	Clause 17(iii) **A distribution licensee or a Bulk consumer, seeking to connect to ISTS, directly, with a load of 50 MW**	Clause 17(iii) **A distribution licensee or a Bulk consumer, captive generators for their captive load seeking to connect to ISTS, directly, with a load of 50 MW and**	As owing to outage of captive power plants or due to any other reason. Then might be requirement to import power

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	and above;	**above;**	and thus it is necessary that an Amendment is proposed to allow Captive Generating party to be categorized as GNA also even though Connectivity is granted as Captive Generating unit with injection of Power.
	Clause 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: Provided that under collective transactions, transmission charges for TGNA shall be payable for drawal schedules more than GNA quantum or T-GNA quantum or both, as applicable.	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: Provided that under collective transactions, transmission charges for TGNA shall be payable for drawal schedules more than GNA quantum or T-GNA quantum or both, as applicable. **Provided further that in case of collective transaction, no Transmission Charges shall be applicable on generators injecting power.**	Amendment is proposed for clarity purpose as presently, Transmission Charges under collective transaction are applicable on generators injecting power