



**TRANSMISSION CORPORATION OF TELANGANA LIMITED**  
**VIDYUT SOUDHA::HYDERABAD - 82**  
**Website:www.tstransco.in CIN No.U40102TG2014SGC094248**

From  
 The Chief Engineer  
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To  
 The Secretary, CERC.  
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**Lr.No.CESLDC/SESLDC/DEPP1/ADE-2/F. GNA/D.No.240 /2021, Dt: 24.02.2022**

Sir,

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

Ref: 1.CERC Notice No:L-1/261/2021/CERC, dated: 16.12.2021.

2. CERC Notice No:L-1/261/2021/CERC, dated: 16.02.2022

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Hon'ble CERC issued draft Regulations 2021 (Connectivity and General Network Access to the inter-State Transmission System) on 16.12.2021 and invited comments/ suggestions/ objections from the stakeholders. The detailed comments/suggestions of various entities of TELANGANA Power utilities are as follows

**Regn.No 3. Application for Grant of Connectivity and GNA**

**Clause 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.

**Clause 3.3**

Each application for grant of GNA shall be accompanied by a non-refundable application fee of Rs.5 lakh along with applicable taxes.

Provided that no application fee shall be payable by the State Transmission Utilities while applying for GNA

**Remarks from TSDISCOMs:**

- TS Discoms want to bring to the kind notice that as per the regulation clause no. 3.5, 80 % of application fee to be refunded if any applicant fails to provide clarification on deficiency raised by Nodal agency.
- Also, 50% of application fee to be refunded if any application is withdrawn prior to in principle approval
- From the above it is understood that the application fee is a refundable component and request CERC to reexamine clause 3.2 & 3.3. accordingly.
- TS Discoms understands that GNA shall be deemed granted to the STU on behalf of the other entities in the state, and thus application fee is not applicable for STU while applying for GNA; however, TS Discoms request clarification on whether application fee is applicable in cases where STU is applying for additional GNA.

**Connectivity Bank Guarantee:****Clause 8.1**

Connectivity Bank Guarantee shall be submitted by an Applicant in three parts, Conn-BG1 amounting to Rs. 50 lakhs, and Conn-BG2 and Conn-BG3, as provided in Regulations 8.2 and 8.3 of these regulations

**Clause 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.

**Remarks from TSDISCOMs:**

TS Discoms request to CERC to determine the Conn-BG1 in Rs /MW

If the entity propose to construct terminal bay(s) on its own , clarification is needed on when to submit Conn BG-3.

In the event of the Nodal Agency, does not intimate the details as per clause (b) of Regulation 8.3 within 6 (six) months, the entity is given the option of withdrawing the application and conn BG-1 shall be returned within 1 month of

with drawl. It may be proposed to return the application fee and interest amount on Conn BG-1.

### **Regn.No.10.3**

Within 30 days of the intimation of connection details by the Nodal Agency under Regulation 10.2 connectivity Agreement shall be signed between the Nodal Agency and the entity which has been intimated final grant of connectivity. On signing of the connectivity Agreement such entity shall become the connectivity grantee.

#### **Remarks from TSTRANSCO:**

Vide Regn. 4.3 of the draft regulation, a generating station already connected to intra-state transmission system shall also be eligible as an Applicant for Connectivity. In such cases, if the connectivity involves STU network also, then STU should also be a signatory to the Connectivity Agreement.

In the earlier regulations, LTA was granted for a period more than 7 years and MTOA was granted for the period from 3 months to 5 years. In the new regulation, the minimum and maximum period of GNA is not specified.

### **Regn.No:12. Dedicated Transmission lines and Bay(s)**

#### **Remarks from TSDISCOMs:**

- It may be proposed to give timelines for the construction of Terminal Bay(s) by entity or Nodal agency where no ATS is required.

### **Regn.No.17.1**

The following entities shall be eligible as Applicants to apply for grant of GNA or for enhancement of the quantum of GNA:

- i) State Transmission utility on behalf of distribution licensees connected to intrastate Transmission system and other intrastate entities,
- ii) A buying entity connected to intrastate transmission system.

### Remarks from TSTRANSCO:

There is no mention of GNA for injecting entity connected to intra-State transmission system. Clarification is needed on the same.

In the earlier Regulations, SLDC used to issue NOC for MTOA application and STU used to issue NOC for LTOA application for intra-state entities applying for Inter-State Open Access.

Now, it is to be clarified whether NOC is needed for the buying/injecting entity connected to intra-State transmission system to apply for GNA and if needed then, who should issue the NOC.

### Regn.No.18.1(a)

#### As per Draft Regulation

#### 1. Deemed Grant of GNA

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:

where,

$A = \{0.5 * \text{maximum ISTS drawl in a time block during the year}\} +$

$\{0.5 * [\text{average of (maximum ISTS drawl in a time block in a day) during the year}]\}$

### Remarks from SLDC/TSTRANSCO :

Presently, TELANGANA Discoms are paying the POC charges based on present methodology i.e., LTA+MTOA quantity. At present, it is **3988 MW**. With the proposed Draft Regulations, the LTA + MTOA is being replaced with GNA Quantity which is worked out for Telangana is **6140 MW** based on total drawal of State including drawls of Discoms through Short Term sources and Intrastate OA Consumer drawls. Now, the charges are to be paid for this quantum irrespective of usage. Substantial increase in POC charges is expected with new methodology.

In the FY 2020-2021, TELANGANA crossed its LTA+MTOA limit only for 9% of the time (time Blocks). The Remaining 91% of the time, TELANGANA is within this LTA + MTOA limits. This shows the drawals are not uniform throughout the year which vary daily, monthly and yearly depending on the Season and Load pattern of States. As per Transmission planning philosophy the network has to be planned to meet Peak Demand of National Grid which may not match with the Peak Drawals of Individual State. So far, the States are utilizing the diversity of Demand across the Regions and availability of network through Short term sources.

***In view of the above, the following is proposed***

- (a) At present, the total LTA + MTOA in the country is around 1,03,000 MW. The proposed country wide GNA is 1,06,578 MW. Both the quantum are nearly equal. But quantity of GNA is shifted from one State to other compared to present LTA + MTOA methodology. Hence, the LTOA+MTOA limits of each entity may be considered as deemed GNAs of respective States initially. After that if any State requires changes, they can change their GNA up/down according to requirement

**OR**

- (b) Consider to modify the calculation of GNA as per below mentioned formula by changing from yearly reference to monthly reference which gives different GNA quantity for different months.

GNA for a month =  $\{0.5 \times \text{maximum ISTS drawal in a time block during the month of the previous year}\} + \{0.5 \times [\text{average of (maximum ISTS drawl in a time block in a day) during the month of the previous year}]\}$

The details of Average Drawal of Telangana State on month on month basis based on above formula is worked as follows:

<b>Month</b>	<b>Monthly GNA for Telangana</b>
April'20	5025
May'20	3523
June'20	5128
July'20	5618
August'20	6112
September'20	4952
October'20	3418
November'20	2910
December'20	5033
January'21	7223
February'21	7501
March'21	8109

Further, the additional GNA requirements also can be considered on month on month basis under the changed dynamics of Power system after aggressive introduction of RE.

**As per Clause 18.1 (d)**

"GNA deemed to have been granted to STU as per clause (c) of this Regulation, shall be published by the Nodal Agency within 30 days of notification of these regulations, as

- (i) GNA within the region and
- (ii) GNA from outside the region, in proportion to contracts, within the region or outside the region, under Long Term Access and Medium Term Open Access obtained in terms of the Connectivity Regulations."

**Remarks from SLDC/TSTRANSCO :**

The methodology for division of GNA within SR and outside SR may be clearly indicated. As long as corridor is available there should not be any limits to draw power from outside Region within total GNA quantity. Whenever, any congestion within/outside corridor only a proportionate allocation shall be made with reference to within/outside GNA quantity.

**As per Clause 18.1 (e),**

"GNA deemed to have been granted to STU 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"

**Remarks from SLDC/TSTRANSCO :**

In TELANGANA, There are more than 100 Number (with installed capacity of around 1500 MW) of intra-state entities (other than Discoms) are availing power through open access on block to block basis inconsistently (not in firm manner). They avail power for few blocks in few days only. Under these conditions, Methodology to be followed to distribute the GNA quantity of State to these embedded entities may clearly be indicated.

**As per Clause 23.1**

*"An entity covered under Regulation 17.1 which is a GNA grantee, may authorize 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"*

**Remarks from SLDC/TSTRANSCO :**

A Market platform (like Exchange market) is requested for optimizing the corridor among the GNA Grantees in a Flexible, Transparent & effective manner on block to block basis without limiting to any specific period keeping in view of wide variations in drawal due to variations in Demand and availability from variable RE Sources.



**As per Clause 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.

**Remarks from SLDC/TSTRANSCO :**

- The drawals of OA embedded consumers under short term are considered in arriving GNA of State. For relinquishment of GNA accounted due to Drawls of OA Consumers can be elaborated clearly.
- Further, the relinquishment charges for the first time may be exempted keeping in view of change in methodology for which States are not responsible as the LTA+MTOA quantum is jumped by 50%.

**Remarks from TSDISCOMs:**

- TS Discoms request clarifications on whether "relinquishment charges shall be equal to 60 times the transmission charges paid by such intra-State entity for the last billing month" means that the GNA tenure is 60 months.
- Further TS Discoms request CERC to clarify the reference behind calculating the relinquishment charges to the tune of 60 times the transmission charges paid by such intra-State entity for the last billing month.
- TS Discoms opines that Relinquishment charges are too high and demands an easy provision for relinquishment of GNA by the entities.
- Suppose, if intra state open access users took NOC for 6 months for a quantum of each 50MW then total will come 300MW .For this quantum corridor covered under GNA and accordingly STU will pay the charges for entire year. But the third party open access user avails only few months out of six months and he will pay POC charges for whatever days power utilized. STU will pay for entire year and intra state open access users will pay less amount.



**As per Clause 25.1 (b),**

"Provided that, if the balance period of GNA is less than 60 months, the relinquishment charges shall be equal to the number of balance months times the transmission charges paid by such entity for the last month under the Sharing Regulations, corresponding to the relinquished quantum."

**Remarks from SLDC/TSTRANSCO :**

It is interpreted from the Draft Regulations that there is no end period for GNA for buying entities. The above clause is mentioned in the context of buying entities. It is better such clause may be incorporated explicitly indicating for Generators keeping in view of past experiences in backing out by Generators.

**Regn No:28.1****As per the clause no.28.1**

T- GNA may be applied for any period from 1(one) time block to upto 11(eleven) months.

**Remarks from SLDC/TSTRANSCO :**

It is requested to indicate clearly whether the application shall be on month on month basis or for total 11 months. In case of requirement of T-GNA for a particular period of the Day throughout 11 months, how the T-GNA will be approved may be clearly indicated.

**As per Clause 29.1**

"T-GNA shall be granted within the available transfer capability (ATC) on the ISTS after accounting for GNA of the GNA grantees."

**Remarks from SLDC/TSTRANSCO :**

In similar lines of publication of corridor by NLDC, publication of GNA and TGNA is useful for planning of T-GNA by States. Right to revision (surrender/recall) may be ensured as per existing Scheduling Timelines.

**Regu.No:31. Standing Clearance for grant of T-GNA****Clause 31.2**

Where the existence of necessary infrastructure and availability of surplus transmission capacity in the intra-State transmission network have been established, the concerned SLDC shall issue Standing Clearance within three (3) working days of receipt of such application:

Provided that when application for Standing Clearance has been made for the first time by an entity, the concerned SLDC shall issue Standing Clearance to the Applicant, within seven (7) working days of receipt of the application.

**Remarks from TSDISCOMs:**

- TS Discoms believe that granting a standing clearance by the SLDC for T-GNA would also involve some background study by the Discoms in the state. Thus request CERC to relax the timeline for approval of Standing clearance to 15 working days where the existence of necessary infrastructure and availability of surplus transmission capacity in the intra-State transmission network have been established; the standing clearance timeline for application make for the first time should be relaxed to 30 working days
- The timeline for approval of standing clearance as per proposed regulation are slightly stringent. Relaxing of the timeline is requested for smooth and accurate functioning of the system.
- Further clause 31.2 para second is giving wrong indication when read independently. TS Discoms request CERC to modify the clause as below:

Provided that when application for Standing Clearance has been made for the first time by an entity, the concerned SLDC shall issue Standing Clearance based on the existing necessary infrastructure or availability of surplus transmission capacity in intraState transmission network to the Applicant, within seven (7) working days of receipt of the application

**As per Clause 31.3**

In case the concerned SLDC refuses to issue Standing Clearance on the grounds of nonexistence of necessary infrastructure or unavailability of surplus transmission capacity in intraState transmission network, such refusal shall be communicated to the Applicant through NOAR within the period of three (3) working days or seven (7) working days, as the case may be, from the date of receipt of the application along with reasons for such refusal:

Provided that where the concerned SLDC has not communicated approval or refusal of application for Standing Clearance within the period of three working days or seven working days, as the case may be, the Standing Clearance shall be deemed to have been granted at the end of the next day after expiry of such period of three working days or seven working days, as the case may be, for a period for which such Standing Clearance was applied for or a period of 7 days, whichever is lower.

**Remarks from TSDISCOMs:**

- TS Discoms request CERC to remove the provisions of deemed approval of standing clearance and request to increase the timeline for SLDCs to communicate the reason for refusing the Standing Clearance on the grounds of non-existence of necessary infrastructure or unavailability of surplus transmission capacity in intra-State transmission network.
- Automatic approval of standing clearance can have serious effects on the entities drawing power in the particular state.

**Reg.No32. Revision of T- GNA****Clause 32.1**

T-GNA granted under Exigency application category or under Advance application category for a period not exceeding one month cannot be revised.

**Remarks from TSDISCOMs**

- TS Discoms want to bring to the kind notice that exigency application cover D, D+1, D+2 days, thus applicability of revision of T-GNA for exigency transactions seems redundant. TS Discoms request CERC to modify the clause accordingly.

**Remarks from SLDC/TSTRANSCO :**

- The minimum period of revision of one month in respect of approval of T-GNA for 11 months may be reduced to 2 clear days, keeping in view of flexibility to handle Load Generation balance.

**As per Clause 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:

Provided that applicable T-GNA charges for the quantum of T-GNA granted shall be payable for the notice period of one (1) month.

**Remarks from TSDISCOMs:**

TS Discoms request CERC to specify the timelines for modifying the advance application schedule.

**Reg.No34. Transmission charges for T-GNA****As per Clause 34.4**

Payment of transmission charges for T-GNA

(a) Transmission charges for T-GNA under Advance application category shall be deposited by the T-GNA grantee with the Nodal Agency as under:

- For T-GNA up to one (1) month - within three (3) working days of grant of T-GNA: Provided that where T-GNA is starting within next 3 working days, transmission charges for TGNA shall be deposited before the start date of T-GNA; 4
- 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.

- (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 the applied quantum or part of the applied period or is rejected, the corresponding transmission charges shall be returned by the next day from the date of approval:

**Remarks from TSDISCOMs:**

- TS Discoms opines that considering the current state of Discoms across India, levying the advance payment requirement for T-GNA products seems further burdening the Discoms. In line with the same TS Discoms request some relaxation in the advance payment for the bilateral products of T-GNA.
- Where most of the Discoms struggling to arrange their working capital requirements expecting advance payments of one month seems a tough challenge for Discoms.
- Thus TS Discoms request CERC to relax the requirements of advance payments for advance application & exigency application category of T-GNA. Further payment process for these products can be worked in similar manner like it is for collection transactions.

**As per Clause 34.5**

In case of default in payment of transmission charges for T-GNA, the TGNA granted shall be cancelled.

**As per Clause 34.6**

In case of delay in payment of T-GNA charges under collective transactions, simple interest at the rate of 0.04% for each day of default shall be payable by the power exchange

### **Remarks from TSDISCOMs**

- TS Discoms request CERC to remove the provisions of cancelling the T-GNA grant in the event of delay/ default in payment of transmission changes for bilateral transactions and retain the existing provision i.e. simple interest at the rate of 0.04% for each day of default (same as for collective transactions)

### **As per Clause 37.9 Short Term Open Access**


- (a) On the date of coming into effect of these Regulations, Short Term Open Access granted in accordance with the Open Access Regulations shall be treated as T-GNA under Exigency application category, granted for the term of such Short Term Open Access.
- (b) On the date of coming into effect of these Regulations, Short Term Open Access applications under the Open Access Regulations pending with RLDC or NLDC shall be closed.

### **Remarks from TSDISCOMs**

- TS Discoms have an understanding that Short Term Open Access transaction means transaction having a tenure of 1 year.
- Further as per proposed regulation T-GNA application have a tenure from 1 time block to 11 months. This T-GNA tenure is divided in various products say exigency transactions from D to D+3 days, advance transactions from D+3 to 11 months.
- TS Discoms request clarification that if above points are true then, why as per clause 37.9 Short Term Open Access granted in accordance with the Open Access Regulations is treated only as T-GNA under Exigency application category.

- TS DISCOMs opines it is not appropriate to consider already granted applications in advance category also under Exigency category.

It is requesting to consider above comments/suggestions while finalizing the draft regulations.

Yours faithfully,  
  
 Chief Engineer/SLDC

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