

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

Sub- Comments on draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (First Amendment) Regulations, 2023

Respected Sir,

We, Manikaran Power Limited ("MPL"), are a Category 1 trading licensee under Central Electricity Regulatory Commission (Procedure, Terms and Conditions for grant of trading licensee and other related matters) Regulations, 2020.

This is in reference to the Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (First Amendment) Regulations, 2023 dated 27.01.2023. Suggestions/feedback on the draft regulation has been sought from the stakeholders.

In view of the same, we hereby submit our comments and suggestions on the proposed draft regulation.

We humbly request you to kindly consider the same while finalizing the said amendments.

Thanking you,

For and behalf of Manikaran Power Limited,


(Legal)



MPL's comments and suggestions on draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (First Amendment) Regulations, 2023.

Regulation	Proposed Procedure	MPL's Comment/ Suggestion
<p>Regulation 9.3- Final Grant of Connectivity for REGS</p>	<p>1. REGS (other than hydro generating station), energy storage system (excluding pumped storage project) or renewable power park developer to which final grant of connectivity has been issued, will have to achieve the financial closure for the capacity of such connectivity, within a period of 12 months from the date of issuance of final grant of connectivity, if the start date of connectivity is within 2 years from date of issuance of final grant of connectivity, or a period equivalent to 50 per cent time period between issue of final grant of connectivity and start date of connectivity, if the start date of connectivity is more than 2 years from date of issuance of final grant of connectivity.</p> <p>2. Proof of such financial closure to be submitted to CTU within 15 days from financial closure.</p>	<p style="text-align: center;"><u>Comment</u></p> <ol style="list-style-type: none"> 1. Whether the financial closure will be considered from the date of approval of connectivity or at the end date of the financial year? 2. When is the financial closure to be submitted?
<p>Regulation 15.1- Transfer of Connectivity Proviso added</p>	<p>A bulk consumer has been granted GNA under Regulation 17.1(iii) seeking to connect to ISTS directly, GNA granted to such bulk consumer may be utilized in part or full by its subsidiaries.</p>	<p style="text-align: center;"><u>Comment</u></p> <p>In case, a bulk consumer has approval for 200 MW GNA and has its other facilities/ subsidiaries, can all these facilities / subsidiaries irrespective of their connectivity take power through the approved GNA of that bulk consumer or whether all these</p>

		subsidiaries need to be mandatorily connected to ISTS directly?
Regulation 17.1 (vi)- Eligibility for GNA	An injecting entity which is granted Connectivity to intra-State transmission system and seeking GNA for purpose of injection into ISTS.	<u>Comment</u> If buyer has already applied for GNA for the purpose of drawl, is it necessary that seller shall also apply for the purpose of injection?
Regulation 17.1-(b-i)-Grant of GNA to entities other than STU	Bulk consumer or DISCOM need to provide CON-BG1 of 50 lakhs/application and BG-3 of Rs 2lakh/MW.	<u>Suggestion</u> It will be not commercially feasible for a buyer to provide 3 BG's to apply for GNA.
Regulation 20.4-Application for grant of GNA by entities other than STU	A bulk consumer or DISCOM will be able to apply for GNA only to draw power from Wind & Solar sources (as mentioned in Reg. 13 of Sharing regulations 2020) which will be identified as GNARE. If they want to draw power from other sources, then they have to apply for additional GNA or can convert GNARE to GNA by making a separate application.	<u>Comments</u> 1. Whether there are any charges involved in conversion of GNARE to GNA?
Regulation 23.1-Use of GNA by other GNA grantees-	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.	<u>Comments</u> 1. What is the timeline for transfer of excess GNA. 2. What are the commercial charges, if any, involved in use of GNA by other entities.