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Date: Tue, 01 Apr 2025 12:17:50 +0530

Subject: Comments of APPCC on draft CERC (Connectivity and General Network Access to the interstate transmission system) (4th ammendment) regulations, 2025

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Sir/Mam,

The comments of APPCC on draft CERC (Connectivity and General Network Access to the interstate transmission system) (4th ammendment) regulations, 2025 are herewith submitted for kind consideration please.

Regards,

S. Sasi Bindu

O/o CGM/PP/APPCC

1 Attachment(s) Download as Zip

GNA 4th Amdmnt Comments-APPCC.pdf

105.8 KB

The comments from APPCC on behalf of APDISCOMs on the said draft regulations are submitted below for approval to submit to CERC. (The PDF copy of the same is also attached in the references)

Comments of APPCC on draft CERC (Connectivity and General Network Access to the interstate transmission system) (4th amendment) regulations, 2025			
Regulation No	As per Draft Regulation	Proposed Regulation by APPCC	Reasons/Justification
5.11 (a)	Entities with Restricted Access (a) An REGS (with or without ESS) based on Wind source or ESS may seek Connectivity with restricted access (non-solar hours) at a terminal bay of an ISTS substation: (i) Through a separate dedicated transmission system, or (ii) Which is already allocated to another REGS or Renewable Power Park, with restricted access (solar hours),	Entities with Restricted Access (a) An REGS (with or without ESS) based on Wind source or ESS may seek Connectivity with restricted access (non-solar hours) at a terminal bay of an ISTS substation, Which is already allocated to another REGS or Renewable Power Park, with restricted access (solar hours). Provided that, if there is no availability of such existing terminal bay with restricted access, then the entities may seek connectivity "Through a separate dedicated transmission Line."	The Existing transmission system which is connected to Solar parks have very low utilisation factor, hence the priority may first be given for seeking connectivity through the Existing transmission system before opting for a new dedicated transmissison system.

5.11(b)	".....Provided further that if the quantum of Connectivity that can be made available for non-solar hours is less than 50 MW, such RES or RHGS shall not be considered for conversion as an entity with restricted access."	This clause may be removed.	The per MW cost of BESS/ESS are on the higher side and any quantum of ESS in the order of 10's of MW are also helpful in optimisation the power purchase cost and also for maintenance of the GRID. Hence, limiting the MW quantum for getting restricted access to 50MW may hamper the optimal utilisation of the Network. Though 50MW at a single project level may seem low but when all such capacities through out india are combined, it would definitely become a very substantial capacity and helps in effective utilisation of the existing ISTS network.
19.2	"Provided that such additional GNA quantum to be added in each of the next three financial years shall be applicable from a specified date(s) of the respective financial year subject to a maximum four dates for a year "	STU, on behalf of intra-State entities including distribution licensees, may apply, twice in a financial year by the months of September and march each year(GNA being effective after a minimum of 6 months from date of application i.e by April and October of the following financial year respectively) , "Provided that such additional GNA quantum to be added in each of the next three financial years shall be applicable from a specified date(s) of the respective financial year subject to a maximum four dates for a year "	The exact timelines for COD of generating stations(Both RE & Non-RE) may not be as anticipated and there are being delayed due to various technical reasons. Ascertaining the exact date of requirement of GNA becomes difficult in such circumstances. Hence, such option may be given to the DICs

Proposed New Regulation by APPCC	-NA-	<p>The Distribution licencees who are GNA grantees may avail GNA-RE for scheduling RE power from such REGS or RHGS, with whom the Distributions licencees have entered the Long term PPA/PSA, in similar lines of Restricted network access allowed to REGS & RHGS, so that the DISCOMs can draw RE power during restricted hours only and pay relevant charges without necessity of paying GNA charegs for non usage period.</p>	<p>With enormous RE integration that is happening and with advent of the proposed ammendments for Solar hour connectivity and Non-solar hour connectivity, the distribution licencees who are procuring power for the benefits of the end consumers, may be allowed for applying GNA-RE without which the Distribution Licencees are now liable to pay the ISTS charges even for the quantum that is not being used during non-solar hours.</p>
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Proposed New Regulation by APPCC	NA	<p>The drawee entities/Distribution licensees may avail GNA-RE for the quantum of power being procured from RE sources through ISTS network, with which PPAs/PSAs are entered prior to the effective date of the GNA regulation.i.e., Prior to 01.10.2023.</p>	<p>The distribution licensees have entered PPAs/PSAs with RE sources based on the landed cost of power arrived after taking waiver of ISTS charges into consideration as per the, then prevailing regulation (i.e., regulations applicable as on the date of PPA/PSA).</p> <p>With the amendment of sharing regulation in line with the GNA regulation, the waiver methodology for RE scheduling is amended and the distribution licensees are supposed to avail GNA on RTC basis even for scheduling RE power which is available for a limited hours in a day and ultimately affecting the landed cost of power and this had disrupted the discoms target of quality power at optimal cost.</p> <p>In order to relieve the discoms from the unwarranted burden in terms of GNA on RTC basis, the discoms may be allotted GNA-RE in substitution to GNA to the quantum of RE power whose PPAs/PSAs were entered prior to GNA regime.</p>
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