STAKEHOLDER COMMENT

## Regulation No. : L-1/3/2025/CERC

Reference No. : 2/2025

Regulation Details				
Reference No.	2/2025	CERC File Number	No. L- 1/261/2021/CERC	
Regulation No.	L-1/3/2025/CERC	Regulation No. Generation Date	01/04/2025	
Regulation Type Regulation Title Subject	: Amendment : Central Electricity F State Transmission : Draft Central Electr inter-State Transm	<ul> <li>Amendment</li> <li>Central Electricity Regulatory Commission (Connectivity andGeneral Network Access to the inter- State Transmission System) Regulations, 2021</li> <li>Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025</li> </ul>		
Comment Details				
Туре	: Stakeholder Comm	: Stakeholder Comment		
Stakeholder Name	: Southern Power Di	: Southern Power Distribution Company of Andhra Pradesh Ltd (APSPDCL)		
Order Date / Direction of	1			

Commission / Compliance Date

## **Comments**

Proposed Regulation: 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? Reason: 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. Acertaining the exact date of requirement of GNA becomes difficult in such circumstances. Hence, such option may be given to the DICs.

Comments regarding Regulation 5(11) (b): 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 optimision 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 throughout India are combined, it would definitely become a very substantial capacity and helps in effective utilisation of the existing ISTS network. Hence this clause may be removed.

Proposed Regulation by APPCC: 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." Reasons: 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 transmission system.