



ग्रिड-इंडिया
GRID-INDIA

ग्रिड कंट्रोलर ऑफ इंडिया लिमिटेड
(भारत सरकार का उद्यम)
GRID CONTROLLER OF INDIA LIMITED
(A Government of India Enterprise)



[formerly Power System Operation Corporation Limited (POSOCO)]

राष्ट्रीय भार प्रेषण केन्द्र / **National Load Despatch Centre**

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Ref: GRID-INDIA/NLDC/CERC/

Date: 03rd Apr 2025

सेवा में,

सचिव,

केन्द्रीय विद्युत विनियामक आयोग

6th, 7th एवं 8th फ्लोर, टावर बी, वर्ल्ड ट्रेड सेंटर

नौरोजी नगर, नयी दिल्ली, 110029

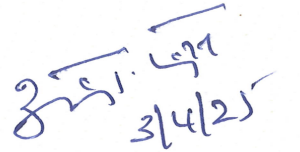
विषय: Suggestions on the Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025

महोदय,

The Hon'ble Commission has notified the Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025 on dated 03.03.2025.

The suggestions on behalf of Regional Load Despatch Centres (RLDCs) and National Load Despatch Centre (NLDC) on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025 are enclosed herewith for kind perusal and consideration of the Hon'ble Commission.

सधन्यवाद,


31/4/25

(एस उषा)

कार्यकारी निदेशक, रा०भा०प्रे०के०

Copy to:

1. CMD, Grid-India
2. Dir (MO), Dir(SO) Grid-India
3. Heads of RLDCs



**Grid Controller of India Limited
(A Govt. of India Enterprise)
(Formerly Power System Operation Corporation Limited)**

Date – 03-04-25

Grid-India observations and suggestions on Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) (4th Amendment) Regulations, 2025

1. With the introduction of Solar & Non-solar hour Connectivity, there may be occasions when entities with solar and Non-Solar Hour Connectivity will give combined schedule of power using same connectivity margin through QCA/Lead Generator.

At times of grid constraint (or contingency), curtailment of scheduled transaction need to be done. *As per IEGC 2023, **Curtailment of scheduled transaction shall be done first from generation sources other than wind, solar, wind-solar hybrid** and run of the river hydro plants with up to three hours pondage (in case of excess water leading to spillage), on pro rata basis based on their GNA/T-GNA Quantum.*

Hence, during congestion/contingency in **Solar hours**, the scheduled transactions of Entities with Solar-hour connectivity (original connectivity) and those with Non-solar hour connectivity (Entities with restricted access) will be curtailed on a pro rata basis. This may lead to ambiguity, as curtailment of scheduled transaction for entities with original connectivity (Solar hour connectivity) will be done at par with Entities having Non-Solar Hour Connectivity.

It is suggested that at the time of Congestion/contingency during **Solar Hours, entities with Non-Solar Connectivity to be curtailed first, followed by Entities with Solar-Hour Connectivity**. For implementation of the same relevant provision in IEGC 2023 may need to be amended.

2. The Draft Regulation in Annexure-IV:

Modalities of Restricted Access for Solar Hours and Non-Solar Hours of the day, mentions –
*“(5) Entities with restricted Access to whom Connectivity has been granted for the same ISTS transmission capacity, either through a separate dedicated transmission system or through sharing of the dedicated transmission system, shall make one of the entities from them a ‘Lead generator’ in terms of Regulation 2.1 (y)(ii) of these regulations or may appoint a **QCA in terms of the Clause (11)(a) of Regulation 45 of the Grid Code, on their behalf to coordinate and facilitate scheduling under the provisions of the Grid Code; Provided that if such Applicants appoint a lead generator or QCA, scheduling of the power of an entity covered under Regulation 5.11(a) of these regulations may be permitted during solar hours by such lead generator or QCA;***

Hence, during solar Hours, QCA or Lead Generator may allow ‘Entities with restricted access’ to inject power, subject to availability of margin in the transmission system. Further, QCA or Lead

Generator will ensure that the **Combined schedule** of 'Entities with Solar-Hour Connectivity' and 'Entities with restricted access' does not exceed the Connectivity Quantum at any point of time.

However, there may be cases when the **combined actual injection (by entities with 'Solar-hour connectivity' and 'Non-solar hour connectivity')** may exceed the transmission capability due to over injection or deviation from schedule.

Therefore, it is important that the **maximum combined injection (by existing and new plant) at any point is limited up to transmission capability by an automatic action to restrict injection through Master Power Plant Controller**. Further, the Hon'ble Commission may mandate the lead generator/QCA to conduct studies to assess controller interaction and take remedial measures to mitigate the same, and the studies may be shared with RLDC for reliable grid operation. Lead Generator/QCA shall also be mandated to model the entire complex and ensure compliance to the CEA Technical standards for connectivity, including but not limited to Reactive power capability for dynamic support, Harmonics filter, and LVRT/HVRT.
