



A Maharatna Company

एन टी पी सी लिमिटेड

(भारत सरकार का उद्यम)

NTPC Limited

(A Govt. of India Enterprise)

केन्द्रीय कार्यालय / Corporate Centre

Date: 03.04.2025

The Secretary
Central Electricity Regulatory Commission,
7th floor, Tower-B, World Trade Centre
Nauroji Nagar, New Delhi-110029

Subject: NTPC Submissions on Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations-2025

Sir,

Hon'ble Commission has published Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations-2025 and has invited comments from the stakeholders on the draft Regulations.

In this regard, please find enclosed NTPC submissions on Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations-2025

Thanking you,

Yours sincerely

Ajay Dua
ED (Commercial)

NTPC Submissions on Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations-2025

1. Clause 3.1 of the draft Regulations provides that:

“A new Regulation, namely Regulation 5.2a. shall be added after Regulation 5.2 of the Principal Regulations, as under:

5.2a - The additional generation capacity under Regulation 5.2 of these regulations shall be subject to the following conditions:

(a) Connectivity Bank Guarantee Conn-BG1 and Conn-BG3 under Regulation 8 of these regulations shall be furnished by the existing grantee for such additional generation capacity.

(b) The existing grantee shall intimate the scheduled date of commercial operation for such additional capacity;

(c) In case additional capacity for which approval is sought under Regulation 5.2 of these regulations is REGS (with or without ESS) or ESS (except PSP), the scheduled date of commercial operation for such additional capacity shall not be later than 18 months from date of approval by the Nodal Agency;

(d) The applicant shall furnish documents required under Regulation 5.8.(xi) of these Regulations, as applicable, for such additional capacity, and shall also be subject to other Regulations including Regulation 11A, 11B, 24, 24.6 of these Regulations.

(e) The entity which has already made an application or has been granted approval by the Nodal Agency under Regulation 5.2 of these Regulations prior to the date of effectiveness of these amendments, shall furnish the scheduled date of commercial operation for such additional capacity, within a period of two weeks from effectiveness of these regulations:

Provided that, in case such additional generation capacity is REGS (with or without ESS) or ESS (other than PSP), the scheduled date of commercial operation for such additional capacity shall not be later than 18 months from the date of effectiveness of these amendments or date of approval by the Nodal Agency, whichever is later. Provided also that such additional generation capacity shall also comply with Clauses (a) to (d) of this Regulation, within a period of one month from the date of effectiveness of this Regulation, failing which approval for such additional generation capacity shall be revoked.”

Submission:

I. It may please be noted that an applicant is required to furnish, Conn-BG3 which is 2 lakh/MW where the “MW” is the connectivity granted by CTUIL. Since connectivity quantum remains the same as existing, while granting connectivity under 5.2, additional Conn-BG3 may not be applicable.

In view of above, it is submitted that the regulation 5.2 a (a) may be modified as follows:

5.2 (a) the additional generation capacity under Regulation 5.2 of these regulations shall be subject to the following conditions:

(a) Connectivity Bank Guarantee Conn-BG1 under Regulation 8 of these regulations shall be furnished by the existing grantee for new application.

- II. If the additional capacity under 5.2 is developed under a project selected through TBCB, Implementation schedule of the project is determined as per the RfS/PPA. Therefore, commercial operation date may be linked with actual timeline of the project as per RfS/PPA.

In view of above, it is submitted that the regulation 5.2 a (c) may be modified as follows:

“(c) In case additional capacity for which approval is sought under Regulation 5.2 of these regulations is REGS (with or without ESS) or ESS (except PSP), the scheduled date of commercial operation for such additional capacity shall not be later than 18 months from date of approval by the Nodal Agency;

Provided that in case REGS (with or without ESS) or ESS (except PSP) capacity is being developed under LoA/PPA under TBCB, the scheduled date of commercial operation for such additional capacity shall be governed by relevant TBCB Bidding Guideline.”

- III. In case an entity has already made an application to add additional generation capacity under regulation 5.2 of the GNA Regulations-2022 within the quantum of Connectivity already granted to it before effectiveness date of the GNA 4th Amendment, the scheduled date of commercial operation for such additional capacity may be kept same as it is approved *prior to the date of effectiveness of these amendments*. Such entities are already tied up according to TBCB requirement/required timeline which shall be difficult to alter.

Also, Sufficient time may be provided to applicant who has applied the connectivity under 5.2 and under approval by nodal agency, to decide the COD dates of such project as developer need to check the availability and procure equipment from OEMs in line with specified timeline.

In view of above, it is submitted that the regulation 5.2 a (e) may be modified as follows:

(e) The entity which has already made an application and yet to be granted approval by the Nodal Agency under Regulation 5.2 of these Regulations as on the date of effectiveness of these amendments, shall furnish the scheduled date of commercial operation for such additional capacity, within a period of two months from effectiveness of these regulations:

Provided that, in case such additional generation capacity is REGS (with or without ESS) or ESS (other than PSP), the scheduled date of commercial operation for such additional capacity shall not be later than 18 months from the date of effectiveness of these amendments or date of final grant by the Nodal Agency, whichever is later. In case REGS (with or without ESS) or ESS

(except PSP) capacity is being developed under LoA/PPA under TBCB, the scheduled date of commercial operation for such additional capacity shall be governed by relevant TBCB Bidding Guideline.

*Provided also that such additional generation capacity shall also comply with Clauses (a) to (d) of this Regulation, within a period of **three months** from the date of effectiveness of this Regulation, failing which approval for such additional generation capacity shall be revoked.”*

2. Clause No. 5 of the draft Regulations proposes addition of a new Regulation 5.11. Clause 5.11(b) provides as below:

“5.11(b) The In principle or final grant of Connectivity intimated to an REGS (with or without ESS) based on solar source or an RHGS with a combination of solar source with another source including ESS (including cases where GNA is effective) shall be converted as an entity with restricted access (corresponding to non-solar capacity during non-solar hours) within a period of one week after the expiry of three months from date of effectiveness of this Regulation:

Provided that while converting to restricted access, the Nodal Agency shall consider the application which such an entity may make for additional capacity under this Regulation 5.2 or Regulation 5.11(a) of these regulations, within a period of three months from effectiveness of this Regulation:

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.”

Submission:

It is submitted that existing Solar developers may be provided at least 12 months for applying connectivity for non-solar hour connectivity instead of 3 months. The same is required considering the fact that existing generating stations are required to evaluate various options for the installation of storage facility which includes indigenous battery manufacturing schedule and huge global demand subsequent to REIA bidding completion for BESS/solar plus storage tenders.

The existing solar developers are also required to make power sale arrangements by participation in BESS or solar plus storage tenders.

In view of above, it is submitted that the regulation 5.11(b) may be modified as follows:

5.11 (b) The In principle or final grant of Connectivity intimated to an REGS (with or without ESS) based on solar source or an RHGS with a combination of solar source with another source including ESS (including cases where GNA is effective) shall be converted as an entity with

*restricted access (corresponding to non-solar capacity during non-solar hours) within a period of one week after the expiry of **one year** from date of effectiveness of this Regulation:*

*Provided that while converting to restricted access, the Nodal Agency shall consider the application which such an entity may make for additional capacity under this Regulation 5.2 or Regulation 5.11(a) of these regulations, within a period of **one year** from effectiveness of this Regulation:*

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.

3. Clause No. 5.1 of the draft Regulations proposes to add 5.11 after Regulation 5.10 of the Principal Regulations, as under:

“5.11 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),*

Submission: It may please be noted that, considering the URS available in thermal generating stations, a thermal generating station may intend to establish an ESS. Further, in case of ESS which is co-located with a thermal station, it has to seek additional connectivity from CTU which may be allowed only after construction of required new transmission infrastructure.

As an alternative to it and to save the additional transmission infrastructure cost, in such cases the **said ESS may be** established at some other location where **non-solar connectivity** in existing transmission system is available. Since additional connectivity shall be required for discharging the ESS during non-solar hours, and to exercise the above option, a thermal gen station needs to be considered eligible for applying the additional connectivity through this clause. This arrangement shall provide dual benefits as given below:

- a. Optimum utilization of existing conventional fleet and Lesser need for additional plants to meet evening peak demand.
- b. Since power from RE generation shall be physically consumed at the same location, additional margins will be available in trunk transmission infrastructure.

In view of the above, clause 5.11 (ai) may be added in the proposed clause 5.11(a) as below:

*“5.11 (ai) thermal **generating station** with a **non co-located** ESS may seek additional connectivity for ESS with restricted access”.*

4. Clause 2.3 of the draft Regulations provides that *Clause (ak-i) shall be added after Clause (ak) of Regulation 2.1 of the Principal Regulations as below:*

“(ak-i) “Solar hours” means the time blocks of the day as declared by NLDC on each Saturday for the subsequent week starting from Monday to Sunday every week for each State based on anticipated solar insolation;

Submission:

It is submitted that as part of Regulation, indicative Solar-hour for region wise and/or state wise location may be furnished as per historical schedule data /generation of solar plants in advance. Only in case there is minor changes in solar hours that can be furnished by NLDC on each Saturday for the subsequent week starting from Monday to Sunday every week for each State based on anticipated solar insolation.

This will help the Developers to design non-solar generations/ESS capacity and non-solar connectivity in advance.

In view of above, it is submitted that the regulation may be modified as follows:

*“(ak-i) “Solar hours” means the time blocks of the day as declared by NLDC on each Saturday for the subsequent week starting from Monday to Sunday every week for each State based on anticipated solar insolation. **A tentative/representative solar hours state wise based on historical/previous schedule of solar plants is enclosed at Annexure-II.”***

Additional Submissions:

- 1. Amendments to allow generators to seek different dates of start of connectivity for different units.**

Submission: Hon'ble commission has appreciated the difficulties being faced by STUs in view of presence of multiple intra-State entities within a State on whose behalf STU apply for GNA. The draft Amendment has proposed to amend Regulation 19.2 to allow the STU to seek different dates of start of additional GNA in a year.

Here it is pertinent to mention that generating stations with multiple units are facing a similar set of difficulties. For connectivity of conventional generating units, CTUIL is seeking the schedule date for commercial operation for each unit separately, however for Date of start of connectivity one single date is being sought in the application for full installed capacity. A typical three unit generating station shall have its Date of commercial operation (CoD) of individual units spread over 12 months. Therefore, start of full connectivity quantum with COD of first unit will entail payment of transmission charges by the generator for the capacity which has not achieved CoD. This is causing a financial burden on generators without any fault on their part.

Therefore, it is submitted that:

Thermal generators may be allowed to seek different date of start for connectivity of part quantum [unit size] under the same application.

2. Regulation 4.3 and 5.1 allow applicants to have dual connectivity to Inter State and Intra State transmission system.

“4.3 A generating station, already connected to or intending to connect to intra-State transmission system shall also be eligible as an Applicant for Connectivity.

5.1 Provided that if such an Applicant already has Connectivity to intra- State transmission system for part of its installed capacity, it may apply for Connectivity to the ISTS for a quantum not exceeding the balance of the installed capacity; “

Submission: Vide regulation 4.3 and 5.1 of the regulations, applicants are allowed to have dual connectivity to Inter State and Intra State transmission system. As per the procedure for application of connectivity, CTU has mandated generators to first apply connectivity to intra-state system and then then apply connectivity to ISTS for balance quantum with submission of a copy of application submitted to STU. However, the following issues are being faced by the generators seeking dual connectivity

- (i) Finalization of quantum of connectivity to be applied to ISTS and Intrastate systems:**

In case of central Generating stations, the allocation of power is done by MoP based on the GoI guidelines and firm allocation to the home state is not available during the award stage of project when connectivity is typically applied.

Any quantum selected by the generator at application stage may change based on the final allocation of power done by MoP. Therefore, STU connectivity may be limited to the quantum of power allocated to Home State and balance may be considered as ISTS connectivity.

(ii) Finalization of transmission system:

Although the CGS makes the connectivity applications to STU & CTU separately, but it required that evacuation system studies are carried for complete generating station considering both ISTS and Intra state transmission elements. Accordingly, CTU may be given the responsibility of the unified planning of power evacuation arrangement from generation project intending to have dual connectivity.

In view of the above a proviso may be added after Regulation 5.1 of the principal Regulations as below:

“5.1 Provided that if such an Applicant already has Connectivity to intra- State transmission system for part of its installed capacity, it may apply for Connectivity to the ISTS for a quantum not exceeding the balance of the installed capacity;

However, for such cases Central Transmission Utility shall coordinate with the STU to which connectivity has been applied for finalization of unified connectivity arrangement.

Further, in such cases Connectivity to intra-state system shall be limited to the firm allocation corresponding to STU to which Intra state connectivity is applied and balance connectivity shall be through the inter-state transmission system.”