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Date: Thu, 03 Apr 2025 16:03:03 +0530

Subject: SRPC secretariat comments on CERC (Connectivity and GNA to the ISTS) (Fourth Amendment) Regulations, 2024

===== Forwarded message =====

महोदय /Sir

महोदया / Madam

Please find attached SRPC secretariat comments on CERC (Connectivity and GNA to the ISTS) (Fourth Amendment) Regulations, 2024

भवदीय /Regards

सदस्य सचिव/MS, SRPC

**SRPC secretariat comments on CERC (Connectivity and GNA to the ISTS) (Fourth Amendment) Regulations, 2024**

<b>Regulation/Page No</b>	<b>As in Draft</b>	<b>Suggestion</b>	<b>Reason/comment</b>
2.1(ai-i)/Page2	“Restricted Access” means restricted scheduling rights for solar hours or non-solar hours of the day for entities covered under Regulation 5.11 of these Regulations;	“Restricted Access” means restricted scheduling rights for solar hours or non-solar hours of the day for entities covered under Regulation 5.11 of these Regulations( <b>In accordance with this Regulation and Annexure-IV of these regulations</b> ) ;	There are certain provisions specified in Annexure –IV which needs to be complied.
2.1(ak-i)	(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;	(ak-i) “Solar hours” means the time blocks of the day as declared by NLDC <b>on each Saturday for the subsequent week starting from Monday to Sunday every week for each State in January of every year, for upcoming FY (April to March), for each State along-with TTC/ATC declaration (11 months in advance)</b> based on anticipated solar insolation;	If Solar Hours are to be declared on weekly basis it would be difficult for Entities under 5.11(a), (b) & (c) in finalising the contracts or supplying under TGNA specifically during changeover periods (morning and evening). Solar hours cannot be changed with weather as it makes the connectivity quantum for scheduling very dynamic. As the movement of sun is well established, NLDC should declare Solar hours much in advance in January of every year, for upcoming FY (April to March) for entities to enter into contracts

			accordingly and to avoid disputes.
5.11(a)	<p>(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:</p> <p>(i) Through a separate dedicated transmission system, or</p> <p>(ii) Which is already allocated to another REGS or Renewable Power Park, with restricted access (solar hours),</p>	<p>(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:</p> <p>(i) 50 MW and above through a separate dedicated transmission system, or</p> <p>(ii) 5 MW and above which is already allocated to another REGS or Renewable Power Park, with restricted access (solar hours),</p>	<p>In line with clause 4.1 (e) of Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State transmission System) Regulations, 2022</p>
<b>Annexure-IV</b>	<p>1(c) Such entity, if participating under Ancillary services under the CERC (Ancillary Services Regulations), 2022 may be directed by RLDC or NLDC, as applicable for injection during solar hours or non-solar hours</p>	<p>(c) Such entity, if participating under Ancillary services under the CERC (Ancillary Services Regulations), 2022 may be directed by RLDC or NLDC, as applicable for injection during solar hours or non-solar hours. During Solar hours schedule will be restricted to margins available and within connectivity quantum.</p>	<p>The concerned entities will have to pay RTDA charges for injection beyond respective connectivity quantum.</p> <p>As per Clause 12(1) of CERC (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2023, For a generating station including ESS and captive generating plant, transmission deviation shall be net metered ex-bus injection, in a time block in excess of GNA of such entity.</p>

	2(c) Such entity, if participating under Ancillary services under the CERC(Ancillary Services Regulations), 2022, may be directed by RLDC or NLDC, as applicable for injection during non-solar hours.	2(c) Such entity, if participating under Ancillary services under the CERC(Ancillary Services Regulations), 2022, may be directed by RLDC or NLDC, as applicable for injection during non-solar hours and schedules will be restricted to margins available and within connectivity quantum.	The concerned entities will have to pay RTDA charges for injection beyond respective connectivity quantum. As per Clause 12(1) of CERC (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2023, For a generating station including ESS and captive generating plant, transmission deviation shall be net metered ex-bus injection, in a time block in excess of GNA of such entity.
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Illustrative Examples for Treatment of the existing Connectivity Applicant as given in EM clause 18 (a)

Suppose there is an RHGS 'A' (Solar -- 700 MW, Wind - 400 MW, ESS -- 200 MW) having a Connectivity of 1000 MW. Such entity shall be converted into an entity with restricted access with injection scheduling rights during solar hours for 1000 MW, and injection scheduling rights during non-solar hours will be 600MW (400 MW Wind + 200 MW ESS).

#### Solar Hrs

	Connectivity	Schedule/Forecast	Actual	RTDA Quantum (if to be computed for RE)
<b>Case I</b>				
Entity A	1000	800	850	0
Entity B	0	200	225	25
<b>Case II</b>				
Entity A	1000	800	850	0
Entity B	0	0	-5	5

#### Non Solar Hrs

	Connectivity	Schedule/Forecast	Actual	RTDA Quantum (if to be computed for RE)
<b>Case III</b>				
Entity A	600	600	650	50

Entity B	400	400	410	10
<b>Case IV</b>				
Entity A	600	0	-15	15
Entity B	400	400	410	10
<b>Case V</b>				
Entity A	600	0	-15	15
Entity B	400	0	-10	10

Note:

- 1) Suitable interlock needs to be stipulated in Grid-India Procedure and provisioned in WBES/NOAR to ensure scheduling within connectivity, provisions to revise forecast by RE, visibility of margin.

5	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;	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 restricting the total injection schedule to Connectivity during Solar hours	
6	NLDC shall notify the Solar hours and Non-solar hours beginning from date of notification of these amendments on a weekly basis for each State. NLDC may revise such hours during the week in case of unforeseen contingency including weather changes.	NLDC shall notify the Solar hours and Non-solar hours beginning from date of notification of these amendments on a <del>weekly basis</del> in January of every year, for upcoming FY (April to March), for each State along-with TTC/ATC declaration (11 months in advance) for each State along-with TTC/ATC declaration (11	If Solar Hours are to be declared on weekly basis it would make Entities under 5.11(a), (b) & (c) in finalising the contracts or supplying under TGNA specifically during changeover periods (morning and evening). Solar hours cannot be changed with weather as it makes the connectivity quantum for scheduling very

		months in advance). NLDC may revise such hours during the week in case of unforeseen contingency including weather changes.	dynamic. As the movement of sun is well established NLDC should declare Solar hours much in advance in January of every year, for upcoming FY (April to March) for entities to enter into contracts accordingly and to avoid disputes.
2.1(y)	<p>(r) “Lead Generator” means,</p> <p>(i) a generating station which is authorized by one or more generating station(s) or ESS(s) through an agreement for applying for Connectivity to the ISTS at a single connection point: or</p> <p>(ii) a generating station already having Connectivity to the ISTS, and through whose electrical system, Connectivity is being sought by one or more generating station(s) or ESS(s) through an agreement.</p>	<p>(s) “Lead Generator” means,</p> <p>(i) a generating station which is authorized by one or more generating station(s) or ESS(s) through an agreement for applying for Connectivity to the ISTS at a single connection point: or</p> <p>(ii) a generating station already having Connectivity to the ISTS, and through whose electrical system, Connectivity is being sought by one or more generating station(s) or ESS(s) or Entities with Restricted Access through an agreement.</p>	To include RE entities with restricted access
4.1 (e)	(d) REGS or standalone ESS with an installed capacity of 5 MW and above applying for grant of Connectivity to	(e) REGS or standalone ESS or Entities with Restricted Access with an installed capacity of 5 MW and above applying	To include RE entities with restricted access

	ISTS through the electrical system of a generating station already having Connectivity to ISTS:	for grant of Connectivity to ISTS through the electrical system of a generating station already having Connectivity to ISTS:	
39.1 & 39.2		Detailed Procedure issued by CTUIL under Regulation 39.1 & by NLDC under Regulation 39.2 would be amended to incorporate the Amendments till date.	To specify the requirement
Additional Comments		CERC sharing Regulation may be modified in line with the new draft, covering the following: (i) Transmission charges for each drawee DIC computed under sub-clause (a) shall be reduced by amount of waiver calculated at sub-clause (c) of this Clause and shall be notified by NLDC.	(i) Sub-clause (d) of Annexure-III of CERC Sharing of Inter-State Transmission Charges and Losses (First Amendment) Regulations, 2023, provides Methodology of calculation of waiver of transmission charges. Since notification of the Regulation, NLDC is notifying waiver % and CTUIL is computing the waived transmission charges. However, the above is causing disparity between RTAs published by RPCs and bills raised by CTUIL creating audit objections for Discoms. Hence, waived transmission charges to be

		<p>(ii) CTUIL shall provide details of connectivity of all entities to NLDC. NLDC shall make available block wise details of Connectivity of all entities and facilitate RTDA computations.</p> <p>(iii) Formula for Waiver of a drawee DIC which has obtained “GNARE” as per clause (ii) of Annexure-III of CERC Sharing of Inter-State Transmission Charges and Losses (First Amendment) Regulations, 2023, may be re-looked for appropriate consideration of multiplication factor 0.3.</p>	<p>notified by NLDC for inclusion in RTAs published by RPCs.</p> <p>(ii) CTUIL is providing details of connectivity in its website, but the same is not being updated within timelines for issuing RTA/ RTDA. Further, providing the information in pdf format causes difficulty in utilising the same, especially in the context of large scale integration of RE entities. With the implementation of Solar and Non-Solar hrs connectivity, time block variations would be there. Hence, the details shall be made available every month by NLDC, alongside files for RTA.</p> <p>(iii) Drawee GNA-RE entity may be able to draw power round the clock within the GNA-RE with introduction of Solar and Non-Solar hours connectivity.</p>
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		<p>(iv) Metering and accounting due to modification/ addition of new entities needs to be approved by RLDC/ RPCs and requisite interface meters as suggested by the RLDC/RPC shall be provided by all entities concerned.</p> <p>(v) Formula for RTDA of injecting entities may please be revisited to suitably include schedules under SRAS and TRAS.</p>	<p>(iv) Clause 6(c) EM mentions as, “To provide clarity on metering and scheduling requirements and the energy accounting at the Point of Injection (POI) for simultaneous injection and drawl needs of the BESS charging.” With the addition of new entity, in order to bifurcate actual injection/drawal between multiple entities connected at PoI, additional IEMs may be required and the same shall be provided by RE entities (existing as well as New entities).</p> <p>(v) As per CERC Ancillary Service Regulation 2022, clause 22 “No transmission charges or transmission losses or transmission deviation charges shall be payable for SRAS and TRAS.”</p> <p>However as per CERC (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2023, Clause 12(1): “For a generating station including ESS and captive generating plant,</p>
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			<p>transmission deviation shall be net metered ex-bus injection, in a time block in excess of GNA of such entity: Provided that for a hydro-generating station, schedules for overload capacity as permissible under the Grid Code during peak season shall not be considered for computing the transmission deviation: Provided further that transmission deviation charges shall not be levied for the quantum of over-injection for providing primary response by a generating station, subject to verification of such over-injection by concerned RPC:”</p>
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