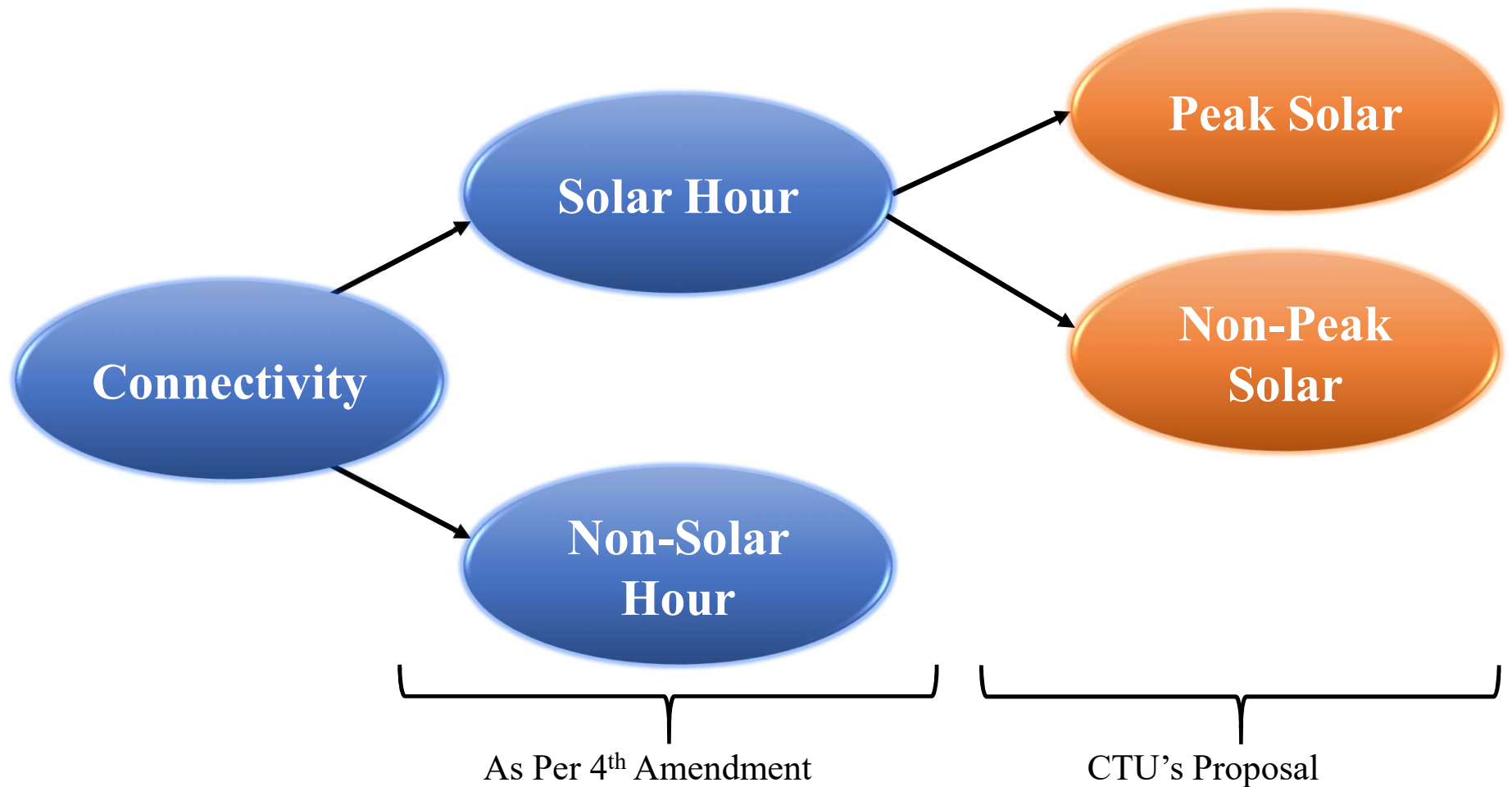


**Public Hearing
on
Fourth Amendment of GNA
Regulations**

**CTUIL
09.04.2025**

Peak Solar, Non-Peak Solar and Non-Solar Connectivity



Peak Solar, Non-Peak Solar and Non-Solar Connectivity

2.1 (ak-i) “**Peak** 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-ii) “Non-Peak-Solar hours” means the time blocks of the day other than peak solar hours 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-ii) “Non-Solar hours” means the time blocks other than ‘Solar hours’ or ‘Peak-Solar hours’ of the same day;

Observations - Modified “Solar Hours” as “Peak Solar Hours” as the same is not defined whereas “Solar Hours” definition not required with this consideration.

2.1 “(q-i)” Entities with Restricted Access” means REGS or ESS whose injection scheduling rights are restricted for solar hours, **non-peak solar hours** or non-solar hours in accordance with Regulation 5.11 and Annexure-IV of these regulations;”

Observations - Non-Peak solar hours need to be defined for restricted access of injection of power in case of standalone ESS.

Provision of Application Fees for Additional Generation Capacity Applications under Regulation 5.2

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

(a1) Applicant shall submit application fees of Rs 5 lakhs along with applicable taxes for each application for addition of generation capacity;

(a2) 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;

Observations - At present application fee is not taken for application under 5.2.

SCOD for Additional Generation Capacity Applications Under Regulation 5.2

5.2a (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~~ 21 months from date of application 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 3, 11A, 11B, 24, 24.6 of these Regulations.

Observations- SCOD has to be provided by the applicant at the time of application. accordingly, 21 months is proposed considering 03 months of application processing time.

Furnishing SCOD of Generating Stations by RPPD

5.8 (vii)(d) The Renewable Power Park Developer shall furnish the scheduled date of commercial operation of the generating stations under the Park prior to ~~grant of~~ final grant of connectivity **for the purpose of compliance under Regulation 24.6 only.**

Provided that if SCOD of the generation projects are not submitted prior to issuance of final grant of connectivity, Start date of connectivity shall be considered as the SCOD of the corresponding capacity.

Provided further that, SCOD of an individual generator shall not be beyond six months of start date of connectivity.

Observations - Further the SCODs should be within six months from the start date of connectivity requested by the RPPD to avoid squatting of connectivity and idling of the transmission system.

Inclusion of RPPD in the Regulation 5.11

5.11(a) Entities with Restricted Access

- (a) An REGS (~~with or without ESS~~) or RPPD based on Wind source with or without ~~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),

Example: An REGS (Wind - 400 MW, ESS - 200 MW) may seek Connectivity of 600 MW with restricted access rights, where injection scheduling rights during solar hours shall be Nil and injection scheduling rights during non-solar hours shall be 600 MW.

Restricted Access of Various Types of Entities

5.11(b) The In principle or final grant of Connectivity intimated to ~~Standalone ESS or an REGS (with or without ESS)~~ or RPPD based on solar source with or without ESS 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 (Solar hours) corresponding to solar capacity and Restricted access other than peak Solar hours corresponding to ESS capacity ~~(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~~ the Regulation 5.2 or ~~this~~ 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 ~~capacity RES or RHGS~~ shall not be considered for conversion ~~as to~~ an entity with restricted access.

Observation- Example covering all type of combination of RE sources their granted connectivity capacity and injection entitlement rights during solar, peak solar and non solar hours is tabulated.

Injection Entitlement for Connectivity Granted to Various RE Sources in Combination with ESS

Sr No.	Source	Connectivity quantum	Peak Solar	Non-peak Solar	Non-Solar	Remarks
1	Solar - 300	300	300	300	0	This entitlement is calculated considering that ESS shall have no injection entitlement during peak solar hour and solar capacity shall not inject during non- solar hours.
2	Wind - 300	300	300	300	300	
3	Standalone ESS -100	100	0	100	100	
4	Solar-300, ESS - 100	400	300	400	100	
5	Wind-300, ESS - 100	400	300	400	400	
6	RHGS (Solar - 300, Wind - 200, ESS – 100)	600	500	600	300	
7	RHGS (Solar - 300, Wind -200, ESS – 100)	500	500	500	300	
8	RHGS (Solar - 700, Wind - 400, ESS – 200)	1300	1100	1300	600	
9	RHGS (Solar - 700, Wind - 400, ESS – 200)	1000	1000	1000	600	
		Installed Capacity	(Solar+Wind) Scheduling of ESS injection prohibited	(Solar+Wind+ESS)	(Wind+ESS) Scheduling of Solar injection prohibited	

Connectivity Bank Guarantees (Conn-BGs) Requirements

Annexure (iv) 1(h) For cases covered under Clause (1)(e) of this Annexure, Connectivity Bank Guarantee ~~viz Conn-BG2 and Conn BG 1 and Conn-BG3~~ **as per Regulation 8 of these Regulations shall be submitted separately by each entity.** ~~, as the case may be, already furnished by an entity under Regulation 5.11(b) or 5.11(c) shall be shared on prorata basis between the entity under Regulation 5.11(b) or 5.11(c) and entity covered under Regulation 5.11 (a) of these regulations. Conn-BG1, as per Regulation 8 of these regulations shall be submitted separately by each entity.~~

Observation- Apportion and securing new BG for the sharing entities for the already submitted BG shall be a difficult and complex proposition . It is proposed that provision may be made for submission of Conn BG3 @ 2 lakhs /MW by new sharing entities also in addition to the BG submitted by the existing grantee.

One-Time GNA Charges

Annexure (iv) 1(i) For cases covered under Clause (1)(e) of this Annexure, One time GNA charges **shall be furnished separately by each entity in terms of Regulation 22.2(d) of these Regulations** ~~already furnished by an entity under Regulation 5.11(b) or 5.11(c) shall be shared on a prorate basis (on the basis of quantum of Connectivity) between the entity under Regulation 5.11(b) or 5.11(c) and entity covered under Regulation 5.11 (a) of these regulations.~~

Observation-It is proposed that new entities may also be made liable to pay one time GNA charges @1Lakhs/MW in addition to the provision already made for one time GNA charges to be paid by the existing grantee.

Change in Shareholding pattern

11A(6) Any changes in shareholding pattern of the Connectivity grantee ~~from the date of application~~ upto CoD of the project shall be subject to the following:

- (a) The promoters of the Connectivity grantee shall not cede control (where control shall mean the ownership, directly or indirectly, of more than 50% of the voting shares of such Company or right to appoint majority Directors) of the Company.
- (b) In case the Connectivity grantee has multiple promoters (but none of the shareholders have more than 50% of voting rights and paid-up share capital), the shareholding pattern shall be maintained and cannot be changed upto COD of the project.
- (c) Any change in shareholding pattern other than covered in sub-clauses (a) and (b) shall require prior approval of the nodal agency and shall be filed for information of commission within 45 days of such approval. Nodal Agency may allow such application considering the ~~practical~~ Statutory requirement for change in shareholding.

Observation-Any change in the promoter shareholding or change in the controlling stake from date of application upto the date of COD of the project shall not be allowed without prior approval of the commission. In case of default, connectivity shall be revoked and all available BG shall be encashed. Practical requirement is subjective and is difficult to judge and accordingly change in share holdings pattern may be allowed only for the cases arising out of statutory requirement.

Removal of Provisions

Annexure (iv) 1(e) In case an entity covered under Regulation 5.11 (a) of these regulations is granted Connectivity through a sub-pooling station of an entity under Regulation 5.11(b) or 5.11(c), an agreement shall be entered into between these entities for sharing of a dedicated transmission system including payment of charges towards using the dedicated transmission system in proportion to the quantum of Connectivity granted to each of such entities which shall be mutually agreed between the parties.

Annexure (iv) 1(f) Nodal Agency shall publish, within 30 days of notification of this Regulations, the indicative Capital Cost of various configurations of the dedicated transmission system as a reference cost to enable cost sharing between entities. The Nodal Agency shall update such a list based on newer configurations and updated indicative capital cost.

Observation-To be deleted.

- The sharing agreement referred in 1(a)(e) of Annexure -IV shall be only for the commercial arrangement between Connectivity grantees.
- However, the grantees shall be bound to share the transmission infrastructure as decided by CTUIL in the stakeholder consultation meeting for evolution of transmission system.
- This is in line with the advisory upload on CTUIL website regarding sharing of dedicated infrastructure and bay between two applicants.

Thank You