



Comments of TNPDC on the draft 4th Amendment to Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State transmission System) Regulations, 2025 :

1. New Regulation- 5.11:Utilization of access to ISTS during non-solar hours- Considering the challenges of suboptimal utilization of transmission system during non-solar hours

- Submission: **Welcome and Innovative step.**
 - Optimizes grid resources, boosts renewable energy (RE) penetration, and reduces overall transmission costs

2. Amendment to Regulation 19.2 of the Principal Regulations:

- Proposed that:

“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 ”

- TNPDC's Submission:

1. The State Discoms are carrying out Resource adequacy Plan annually subject to the revisions / modifications based on the delay in commissioning of generation projects, new open access customers to STU, requiring additional GNA.
2. CTU is carrying out transmission planning studies on continuous basis, based on the new connectivity / GNA applications.
3. The Hon'ble Commission is requested ***to issue suitable amendment to facilitate the STUs and Distribution licensees in applying additional GNA on par with new applicants.***

3. Amendment to Regulation 24.6 of the Principal Regulations:

- Proposed:

“(d) Connectivity granted to a Renewable Power Park developer shall be revoked for the corresponding capacity, if the Connectivity and corresponding GNA has been made effective in terms of Clause (a) of Regulation 22.4 of these regulations and generating station(s) within the Power park fails to achieve COD on or before. “

TNPDCL Submission:

1. TNPDCL reiterates the views on the draft third amendment notified by the Hon'ble Commission that are relevant to this proposed amendment.
 - i. For the applicants covered under Land BG route, the risk for the abandonment of the projects is more.
 - ii. The Con BG1 &BG2 specified in the regulation 24.3 for relinquishment might not provide sufficient financial security for the costs incurred due to the creation of associated transmission system and the common transmission system.
 - iii. The entire capital investment made on the transmission system will put into the pool and the discoms will be burdened with the unwarranted financial liability

A new Regulation, namely, Regulation 24.3A, shall be added after Regulation 24.3 of the Principal Regulations as under:

- ***“24.3A For Connectivity Grantees covered under sub-clause (c) of Clause (vii) or sub-clause (c) of Clause (xi) of Regulation 5.8 of these regulations: If the Connectivity is relinquished after the final grant of Connectivity, 100% of the subsisting Bank Guarantee submitted under sub clause (c) of Clause (vii) or sub-clause (c) of Clause (xi) of Regulation 5.8 of these regulations, shall be encashed, irrespective of the time line of relinquishment of the connectivity. In addition, Relinquishment charges shall be made applicable to the connectivity grantee in line with the GNA grantee detailed under Regulation 25.”***

In the similar lines the following amendment may be introduced:

If the connectivity granted to a renewable power park is revoked partially or fully, then Land BG if any shall be revoked in addition to levying Relinquishment charges on par with the GNA grantee detailed under Regulation 25.

Additional Submission:

1. Regulation 17.1 of the GNA Regulations :

Submissions:

- Regulation 17.1 does not facilitate DISCOMs to apply for GNA directly with CTUIL or enhancement of the quantum of GNA.
- As per Clause 17.1 (iii), distribution licensees are eligible to apply for grant of GNA or enhancement of the quantum of GNA directly to CTUIL. However, the State owned Discoms having PPA with the generators are not included in the eligible entities to avail GNA directly from CTUIL. The financial liability is tied up with the DISCOMS while the eligibility for GNA applicant is denied.
- Hence, **State owned Distribution licensees shall be made eligible applicant for GNA.**

2. Revision of Deemed GNA: Regulation 18 (a) of CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2022

Submissions:

- i) Tamil Nadu GNA had been worked out to 9177 MW as per Reg. 18 (a) of CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2022.
- ii) NLDC has excluded the deemed LTA (power drawn through Intra state network (STU)) in respect of MAPS and NLC TPS-II Stage-1 and the same quantum has been deducted for computation of transmission charges and losses.
- iii) However, computation for all other purposes including RE- waiver computation, Deviation and Ancillary Service pool account deficit are carried out based on 9177 MW only.
- iv) It is requested to revise the GNA quantum considering the exclusion of quantum drawn through Intra – state network from CGS and to update the GNA quantum based on drawl data for the year 2021-22, 2022-23 and 2023-24.**

Thank you

