From: "MEMBER SECRETARY" < mssrpc-ka@nic.in>

To: "Harpreet Singh Pruthi" < secy@cercind.gov.in >, "Shilpa Agarwal" < shilpa@cercind.gov.in >

Cc: "Superintending Engineer" < secommlsrpc-ka@nic.in>

Sent: Thursday, August 29, 2024 3:40:31 PM

Subject: SRPC secretariat comments on 3rd Amendment to GNA Regulations

महोदय /Sir महोदया / Madam

Please find attached SRPC secretariat comments on 3rd Amendment to GNA/Connectivity Regulations.

भवदीय /Regards सदस्य सचिव/MS, SRPC

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

Regulation/Page No	As in Draft	Suggestion	Reason/comment
4.4/Page 4	Grant of	Grant of	Better to be genric
	Connectivity to	Connectivity to	as Regulation cannot
	REGS seeking to get	REGS seeking to get	be amended again
	connected to	connected to	and again. Any other
	transmission	transmission	such ISTS can also
	network of Bhakra	network of Bhakra	be included.
	Beas Management	Beas Management	
	Board (BBMB)	Board	
		(BBMB)/ <mark>Damodar</mark>	
		Valley Corporation	
4.4.1/D	A BEGG 14	(DVC)	D 1
4.4.1/Page 4	A REGS with	A REGS with	Better to be genric
	installed capacity 5	installed capacity 5	as Regulation cannot
	MW and above,	MW and above,	be amended again
	either individually or	either individually or	and again.
	collectively through a lead generator,	collectively through a lead generator,	There may be many combinations of RE
	owned and operated	owned and operated	power being injected
	by BBMB, and	by BBMB/DVC, and	into ISTS and it
	located in BBMB	located in	might be sold to PX,
	area may seek	BBMB/DVC area	self consumed,
	Connectivity to the	may seek	bundled, flexibility
	ISTS network of the	Connectivity to the	scheme therefore
	BBMB, including a	ISTS network of the	scheduling and
	substation or	BBMB/DVC,	accounting needs to
	transmission line or	including a	be finalised by
	switchyard of a	substation or	BBMP/DVC with
	generating station of	transmission line or	RLDC/RPC
	BBMB, by making	switchyard of a	
	an application to the	generating station of	
	Nodal agency,	BBMB, by making	
	along with system	an application to the	
	study conducted by	Nodal agency,	
	BBMB SLDC for	along with system	
	such an entity.	study conducted by	
		BBMB/ <mark>DVC</mark> SLDC	
		for such an entity.	
		The scheduling and	
		accounting will be	
		mutually discussed	
		by BBMP/DVC and	
		respective RLDC/RPC.	
4.4.1/Page 4	A REGS with	A REGS with	There may be many
1.1.1/1 450 7	installed capacity of	installed capacity of	combinations of RE
	less than 5 MW,	less than 5 MW,	power being injected
	1000 111110 111111,	1000 11111 0 111 11 ,	position being injected

owned and operated owned and operated into ISTS and it might be self by by BBMB, may seek BBMB/DVC, may consumed, bundled, Connectivity to the seek Connectivity to flexibility scheme ISTS network of therefore scheduling the ISTS network of and accounting BBMB, including a BBMB/DVC, including a needs to be finalised substation or transmission line or substation or by BBMP/DVC with RLDC/SLDC the switchyard of a transmission line or generating station of the switchyard of a BBMB, by applying generating station of to BBMB SLDC for BBMB/DVC, by such connectivity applying to and after approval BBMB/DVC SLDC of BBMB SLDC, for such connectivity may get connected and after approval to the network of of BBMB/DVC SLDC, may get BBMB. The connected to the approval of SLDC shall be network of BBMB/DVC. The forwarded to the Nodal Agency for approval records. There shall of SLDC shall be be no separate forwarded to the scheduling and Nodal Agency for accounting for such records. There shall entities by RLDC. be no separate However, RLDC scheduling and may add such accounting for such entities to the entities by RLDC. schedule of the However, RLDC existing may add such entities to the generating station of BBMB, to which schedule and of the such REGS of existing capacity less than 5 generating station of MW is connected." BBMB/DVC, to which such REGS of capacity less than 5 MW is connected." The scheduling and accounting will be mutually discussed by BBMP/DVC and respective RLDC/RPC. New Proviso in Provided also that an Provided also that an As connectivity equal to LOA or Regulation REGS making an REGS making an 5.1/Page5 application based on application based on PPA and IC can be LOA or PPA under LOA or PPA under more than

	Regulation 5.8(xi) may apply for a grant of Connectivity for a quantum equal to the quantum of LOA or PPA, which may be less than the installed capacity	Regulation 5.8(xi) may apply for a grant of Connectivity for a quantum equal to the quantum of LOA or PPA, which may be less than the installed capacity. Provided AVC will be restricted to the connectivity and same is applicable to Regulation 5.2.	connectivity. In such cases AVC will be ambiguously declared by the REGS and Deviations would be effectively less. Suitable clause may be inserted to allow AVC declaration only up to the connectivity.
New Proviso in Regulation 23.3/Page No. 18	23.3 NLDC shall make a web portal where a list of GNA grantees with their GNA quantum shall be displayed. The GNA Grantees shall be able to indicate the GNA quantum, dates, and time blocks for which such quantum can be made available, for use by other GNA grantees. GNA grantees who wish to use the GNA of another GNA grantee shall also be able to indicate their requirement of GNA quantum along with dates and time blocks for which such quantum is required.	23.3 NLDC shall make a web portal where a list of GNA grantees with their GNA quantum shall be displayed. The GNA Grantees shall be able to indicate the GNA quantum, dates, and time blocks for which such quantum can be made available, for use by other GNA grantees. GNA grantees who wish to use the GNA of another GNA grantee shall also be able to indicate their requirement of GNA quantum along with dates and time blocks for which such quantum is required. CTUIL shall make available to RPCs the Connectivity/GNA details for all entities.	issue RTDA based on the connectivity/ GNA quantum of regional entities. Implementing agency is providing monthly the details of drawl GNA grantees but no information regarding GNA/Connectivity of Injecting entities is being received from CTUIL. To avoid any discrepancies in the accounts the same shall be made available to RPCs.