

FEBRUARY 2021

**SUBMISSION ON CERC (CONNECTIVITY AND  
GENERAL NETWORK ACCESS TO INTER-STATE  
TRANSMISSION SYSTEM) REGULATIONS, 2021**

**ANSHUMAN GOTHWAL**



**SUBMITTED TO**

CENTRAL ELECTRICITY REGULATORY COMMISSION

  
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Central Electricity Regulatory Commission (CERC) has invited comments/suggestions on "Draft CERC (Connectivity and General Network Access to the Inter-State Transmission System) Regulations, 2021." The present submission is in response to the draft order published on the commission's website. We request the Commission to accept this submission on record.

## SECTION-WISE COMMENTS

### 18. Deemed Grant of GNA

We submit that the commission shall revisit the proposed methodology for determining the deemed grant of GNA to the states. For multiple states, the value arrived by this methodology is less than the peak load met by the states in 2019-20. We would like to highlight that the peak being met by the states is increasing every year. Further, the contracted generation capacity of the state utilities through long term PPAs is also much higher. If the quantum of the deemed grant is less, the burden of acquiring additional GNA shall fall on end consumers. Considering these issues, it suggested revising the methodology and increases the deemed grant of GNA.

### 28. Application for grant of T-GNA

We submit that the commission clarify where the procedure for the application to the T-GNA for multiple time blocks by the same entity for the same day be treated as a single application or different applications.

In section 28.8, the regulations propose to forfeit the application fee of the T-GNA if the application is rejected. This goes against the established commercial principle. We submit the commission may state the rationale for this sub-regulation.

### 29. Processing of applications for grant of T-GNA by Nodal Agency

The section-29.3 specifies that the advance applications be considered on a first-come-first-served basis and shall be processed latest by 23.59 hrs of the (D+1) day. The section 28.1 details about application for T-GNA can be made for a period of one-time block. We request the commission to clarify 'minimum duration' before which the application should be made for the consideration by the nodal agency.

### 30. Grant of T-GNA

We submit the nodal agency to be mandated to publish the details of the approved and rejected application for T-GNA on the website along with the detailed reasons and related data on the Available Transfer Capability (ATC) data as per SLDC.