

**Consolidated Stakeholder Comments and Grid-India Response on "Draft Procedure for Allocation of Transmission Corridor for Scheduling of GNA & TGNA Transactions"**

**Inputs Received from following Stakeholders:**

<b>S. No.</b>	<b>Stakeholder Name</b>
1	AD Hydro Power Limited
2	Andhra Sugars Limited
3	CTUIL
4	Directorate of Energy, Himachal Pradesh
5	HVPNL-HPPC
6	SLDC Himachal Pradesh
7	Hindustan Power Exchange (HPX)
8	Indian Energy Exchange (IEX)
9	ITC Limited
10	New Age Markets in Electricity Private Limited
11	Power Company of Karnataka Limited (PCKL)
12	Punjab State Power Corporation Limited (PSPCL)
13	PTC India
14	ReNew Power Private Limited
15	SLDC Punjab
16	SLDC Telangana
17	SLDC Uttar Pradesh
18	SLDC West Bengal
19	SRPC (Southern Regional Power Committee)

**Consolidated Stakeholder Comments and Grid-India Response on "Draft Procedure for Allocation of Transmission Corridor for Scheduling of GNA & TGNA Transactions"**

S.No.	Stakeholder Name	Stakeholder Comment	NLDC Procedure Clause (Clause nos. pertain to the draft procedure which was uploaded for stakeholder consultation; clause nos. in final procedure submitted to CERC may differ)	NLDC Comments
1	AD Hydro Power Limited	There is no mention of the timeline applicable on advance scheduling for month ahead basis e.g. the start date and end date of advance booking for the month T, may kindly be mentioned for clarity in scheduling practice.		As per IEGC 2023, scheduling shall start on 'D-1' day for 'D' day. Included in "Procedure for Grant of Temporary General Network Access (T-GNA) to the Inter-State Transmission system through National Open Access Registry (NOAR)"
2		Further, there is also no mention of the charges or its revision if advance booking is done for bilateral sale at a prior date and the actual charges gets revised during the date of actual power scheduling. Will there be any retrospective charges applicable in such case?	Clause 4.2 - Allocation of Transmission Corridor and Scheduling of Transactions under Advance Application Category	Included in "Procedure for Grant of Temporary General Network Access (T-GNA) to the Inter-State Transmission system through National Open Access Registry (NOAR)"
3		In case of month ahead booking of power through T-GNA, there is no clarity on the charges applicable and hence it may be difficult for merchant power plants to assess the tariff and other commercial aspects of power sale.		Included in "Procedure for Grant of Temporary General Network Access (T-GNA) to the Inter-State Transmission system through National Open Access Registry (NOAR)"
4		We would like mention that, there are instances during operation of hydro power plants when the outage is due to flash floods and it becomes highly dangerous to operate the generator despite it not being under outage. Further, there are also such instances when the associated transmission line also comes under the influence of natural calamities such as flash floods, uprooting of tower, felling of tree trunk on the transmission line etc. such aforementioned conditions may kindly be also incorporated under such eligibility of revisions under T-GNA.	Clause 5.3 (a) - Revision due to forced outage of a generator	Provision for revision in schedules in case of "Transmission Constraints" and "Forced outage of units" is already kept in IEGC, 2023 as well as in the procedure.
5	Andhra Sugars Limited	Since Distribution Licensee are required to adhere to Power Procurement guidelines of this SERC which mandate Certain Minimum Percentage of Tie-up from Long Term Sources, the proposed Transmission Charges for GNA for the Entities Located in the State for the Billing Month will cause burden to the Distribution Licensee which will impact the Retail Tariff		This procedure is for scheduling of transactions and the comment is out of scope for this procedure
6		Suggested that there should not be any increase in Transmission Deviation Charges for the Additional drawl on Applicable Transmission Charges and requested to retain the present charges		This procedure is for scheduling of transactions and the comment is out of scope for this procedure
7		Suggested to remove the clause of Minimum Drawl Condition i.e. @75% since the regulations specifies to provide Non-Discriminatory Open Access to Licensees / Generating Companies / Consumers for the Use of Grid Network		This is outside the purview of the procedure. It required Regulatory Change.
8		Suggested to consider the exemptions granted by MNOP with regards to waiver of ISTS Charges / Losses for Particular Renewable Energy Projects		This procedure is for scheduling of transactions and the comment is out of scope for this procedure
9		It is worthwhile to note that the Gas Based Power Plants are acknowledged to be best suited for renewable energy integration and sufficient Peak Power Requirement and majority of the Gas Based Power Plants in the country running on Low PLF / NIL due to Unavailability of Economical Gas and the Charges have to be paid for full installed capacity irrespective of their actual Generation / Utilization. Hence, it is suggested to allocate the required Gas at an economical rate to strengthen the renewable energy		This procedure is for scheduling of transactions and the comment is out of scope for this procedure
10		Suggested not to impose Transmission Charges for the Renewable Energy Generating Projects in case of Delay in commissioning due to force majeure events / reasons not attributable to the Developer		This procedure is for scheduling of transactions and the comment is out of scope for this procedure
11		Suggested to see that there cannot be any discrimination between the Distribution Licensees		This procedure is for scheduling of transactions and the comment is out of scope for this procedure
12		During Curtailment due to System Constraints, T-GNA is to be Curtailed First for better utilization of the Network	Overall Procedure	The sequence of curtailment of transactions in case of system constraints is as per IEGC 2023
13		The Proposed GNA & T-GNA frame work should be in a position to overcome the present Transmission Constraints which may help to develop integrated electricity market		This procedure is for scheduling of transactions and the comment is out of scope for this procedure
14		The GNA frame work should be in a position to provide more flexibility and possibility of Open Access to the Buyers & Sellers of Power in Terms of Scheduling Subject to Grid Constraints		Being done.
15		The GNA & T-GNA frame work shall be in a position to facilitate to their respective Short Term / Long Term Agreements		GNA, T-GNA are immune to type of contracts and very flexible.
16		The GNA & T-GNA frame work should facilitate on Declaration of ATC / TTC for Import / Export of Power and the SLDCs in consultation with RLDCs the Losses have to be calculated and finalized		This procedure is for scheduling of transactions and the comment is out of scope for this procedure
17		The GNA & T-GNA frame work should provide detailed provisions of Inter Regional Corridor and Injecting and Drawee Control Areas		The same shall be uploaded in the NOAR portal.
18		The Minimum Quantum of Power purchasable from the exchange in Open Access Transaction has to be considered from a minimum quantum of 0.1 MW		Incorporated
19		The GNA & T-GNA frame work shall be provided with the Condition of Must Run Status with prioritization for Non-Conventional Power		During curtailment it has been considered. But not during the D-1 scheduling. This is as per IEGC, 2023 only.
20		The GNA & T-GNA frame work should increase the Scheduling Flexibility, Promotes Investments with reliable Transmission Access for the Generation / Transmission Sectors		This procedure is for scheduling of transactions and the comment is out of scope for this procedure.
21	CTUIL	Above may be deleted as CTUIL shall Grant GNA based on actual studies and not on earlier declared TTC/ATC/TRM etc. CTU shall publish the details of granted and effective GNA quantum on its website on monthly basis	Annexure - 1: Clause 3.2 (b) - The Central Transmission Utility (CTUIL) shall assess and declare the Total Transfer Capability (TTC), Available Transfer Capability (ATC) and Transmission Reliability Margin (TRM) of the inter-regional links/corridors as well as of the individual control/bid areas within the region for the purpose of grant of GNA. The CTUIL shall also provide interface for communicating approved GNA quantum to NLDC	For grant of any GNA, along with the studying the local constraints in the transmission system, it is also imperative to ensure sufficient margins in the import and export capability of the associated control areas.  Therefore, the declaration of long-term import/export capability figures in advance is of utmost importance. The figures will also provide an indication to the stakeholders about available margins in the network.  The practice is already being followed by CTUIL and the same needs to be continued.
22		NLDC, RLDC and SLDCs in consultation with CTU shall perform the TTC computation studies such that all anticipated operating conditions are covered.."	Annexure - 1: Clause 3.2 (g) - NLDC, RLDC and SLDCs shall perform the TTC computation studies such that all anticipated operating conditions are covered. In the studies, the worst credible contingency shall be considered to ensure equipment loadings, voltage stability, and transient stability limits. The detailed procedure for computation of TTC is enclosed at Annexure-1	NLDC/RLDC/SLDCs will refer TTC figures declared by CTUIL while computing TTC/ATC for short-term horizon.
23		Following may be deleted as COD is declared only after completion of successful trial run as per IEGC. "New transmission elements shall be considered only after the date of commissioning of that asset and duly considering their reliability during initial period." Further following may also be considered-  New transmission elements which are scheduled to be commissioned within 11 months from timeframe of study and already granted GNAs by CTU to be considered as this may impact margins for T-GNA. If required, the T-GNA may be granted subject to scheduled commissioning of new transmission elements	Annexure-1: 3.5.1- Network Topology: Shall be as per network data obtained from CTU and STUs. If the updated network details are not received from respective agencies, network details as available with NLDC/RLDCs/SLDCs shall be used for TTC computation studies.  New transmission elements shall be considered only after the date of commissioning of that asset and duly considering their reliability during initial period	The new elements shall be considered in TTC computation only after their commissioning and reliable operation so as to avoid curtailment of any granted T-GNA later on in case of delay in the expected commissioning of new elements.

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24	DIRECTORATE OF ENERGY, HIMACHAL PRADESH	<p>Himachal Pradesh is Hydro rich state and the state has approximately 1400 MW share in the Central Sector Hydro Plants (As per Ann-A). The scheduling of these Central Sector Hydro Plants is done by NRLDC to the beneficiary states as per allocation of NRPC.</p> <p>In the summer season (May to September Peak season of Hydro) Himachal Pradesh is surplus in power and opt for banking this surplus power with other states. In the winter season (Oct to April-Lean season of Hydro), the state is deficient in power and take back banked power to meet state demand. As per the clause, wherein it has been mentioned that drawee GNA grantees, shall furnish time block-wise request for drawl to the concerned RLDC, however from the above we understand that the drawal schedule of the state will be as ISGS schedule minus Schedule outside the state like banking with other state/ Sale in Power Exchanges/ Bilateral sale in accordance with CERC (Sharing of Inter-State Transmission Charges and Losses) Regulation, 2020 Clause No. 12 (b) (Transmission Deviation please clarify on the same.</p> <p>Corridor Scheduling and of Transactions under GNA) (b) Further it is also clarified that whether the allocated power by NRPC from Central Sector Hydro projects to the state is deemed scheduled beyond allotted GNA quantum to the state or otherwise</p>	<p>Clause 4.1 (b) - Respective SLDs on behalf of the intra-State entities which are drawee GNA grantees, shall furnish time block-wise request for drawl to the concerned RLDC in accordance with the contracts by 0800 hrs of 'S-1' day, 'S' day being the day of scheduling. The requisition shall be punched in the Web based Scheduling Software (WBES). Other drawee GNA grantees which are regional entities shall also furnish the time block wise request for drawl to the concerned RLDC in accordance with the contracts by 0800 hrs of 'S-1' day.</p>	<p>Drawal schedule for all ISGS to be considered.</p>
25	HPPC	<p>In case of PPA with a trader injection point may not be specified. Hence the clause may be modified as under:</p> <p>Respective SLDs on behalf of the intra-state entities which are drawee GNA grantees shall furnish the details of the contracts/power purchase agreements (PPAs) including the injection point or in absence of injection point target injection region at least 3 days prior to the day of scheduling (i.e. by 0800 hrs of 'S-3' day with 'S' being the day of scheduling) so as to configure these details in the scheduling system. The requisite information shall be provided in the Web based Scheduling Software (WBES).</p> <p>The above rationale for amendment is in accordance of CERC GNA Regulation clause no. 28.S(iv)</p>	<p>4.2. Allocation of Transmission Corridor and Scheduling of Transactions under Advance Application Category</p> <p>(b)The T-GNA grantees shall furnish shall furnish the details of the power purchase agreements (PPAs) including the injection point at least 3 days prior to the day of scheduling (i.e. by 0800 hrs of 'S-3' day with 'S' being the day of scheduling) so as to configure these details in the scheduling system. The requisite information shall be provided in the Web based Scheduling Software (WBES)</p>	<p>PPA with trader is backed by PSA. Therefore, injection point will always be there.</p>
26		<p>The clause may be modified as under:</p> <p>For a particular RTM session, if the cleared volume by a particular power exchange (s) is (are) more than the margin provided by NLDC through NOAR, then NLDC shall consider the trade quantum of all bid area/ control area / group of bid or control areas for the particular power exchange(s) to be zero equal to the available margin and send an exception report to the corresponding power exchange(s) through NOAR in T+2 time block.</p>	<p>4.5. Allocation of Transmission Corridor and Scheduling of Real Time Collective Transaction</p> <p>(h) For a particular RTM session, if the cleared volume by a particular power exchange (s) is (are) more than the margin provided by NLDC through NOAR, then NLDC shall consider the trade quantum of all bid area/ control area / group of bid or control areas for the particular power exchange(s) to be zero and send an exception report to the corresponding power exchange(s) through NOAR in T+2 time block.</p>	<p>Due to time scarcity in RTM, reallocation is not possible.</p>
27		<p>The comment of HPPC is as under:</p> <p>There must be a provision for revision of schedules under T-GNA. Because under advance category T-GNA, application, The T-GNA grantees shall furnish shall furnish the details of the power purchase agreements (PPAs) including the injection point at least 3 days prior to the day of scheduling (i.e. by 0800 hrs of 'S-3' day with 'S' being the day of scheduling) so as to configure these details in the scheduling system).Hence, there may be a need of revision of schedule due to change in weather or forced outage of any generator.</p>	<p>5.3. Revision of Schedules under T-GNA</p> <p>Scheduled transactions under T-GNA once scheduled can't be revised other than in case of congestion management as mentioned in 6.1 of this procedure and following cases:</p>	<p>As per IECG, 2023, clause 49 (4), "...Provided that scheduled transactions under T-GNA once scheduled cannot be revised other than in case of forced outage as per clause (7) of this Regulation."</p> <p>In case of forced outage, revision provision is considered in the procedure.</p>
28		<p>The following clause can be amended as:</p> <p>II. Within schedule under T-GNA, collective transactions under real time market shall be curtailed first followed by bilateral exigency application followed by collective transactions under integrated day ahead market followed by bilateral advance application.</p>	<p>5.1 Real time congestion management and curtailment thereof:</p> <p>d) The transactions already scheduled may be curtailed by the Regional Load Despatch Centre as per the following sequence:</p> <p>i. ....</p> <p>ii. Within schedule under T-GNA, bilateral transactions shall be curtailed first followed by collective transactions under integrated day ahead market followed by collective transactions under real time market.</p> <p>iii. ....</p>	<p>The sequence of curtailment of transactions is as per IECG 2023</p>
29		SLDC Himachal Pradesh	No comments/suggestions	-

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31	HPX	Need clarity on "inter-region wise ATC" mentioned in the clause because as per the draft procedure only import & export ATC will be published by NLDC	Clause - 3.2 (f) - The consolidated bid area/control area/combination of control areas/inter-region wise TTC, TRM and ATC shall also be published on NLDC/POSOCO website.	Clause has been modified suitably
32		Configuration of any additional bid areas will be dynamic or NLDC will intimate in advance let say 15 days prior to the creation date. Further, whether the Exchanges system should be dynamic to configure bid areas on realtime and grouping of bid areas will change dynamically for congestion management on daily/realtimebasis. If so, this will create complex situation to handle at exchange level and will require considerable time.	Clause - 4- Allocation of Transmission Corridor:For the purpose of transmission corridor allocation, all states shall be configured as bid-areas.  Further, additional bid areas/group of bid areas may also be configured as and when the need arises. NLDC shall be responsible for configuration/reconfiguration of these bid area(s) based on the anticipated congestion and prevailing grid conditions. Power Exchanges shall keep the provision in their respective systems for configuration of bid areas as and when intimated by NLDC.	Operationalisation of new bid area will be done in consultation with PXs in advance. But all PXs to configure each state and UT as separate Bid Area
33		Once the trade has been executed at exchange platform, both the parties (Buyer/Seller perform their respective obligations and exercise their rights as per exchange business rules & bye laws as approved by the CERC, as such there is no need of separate signed copy of PPA/Contract to be submitted for exchange traded contracts. In NOAR, once the exchange/entity has submitted the details of seller/buyer, timeperiod, timeblocks, quantity for advance T-GNA and is being approved by NOAR then this shall form the basis of a standard contract in the NOAR system. Whenever, exchange/entity wants to schedule the power, they shall use that respective standard contract.	Clause 4.2 (b): The T-GNA grantees shall furnish shall furnish the details of the power purchase agreements (PPAs) including the injection point at least 3 days prior to the day of scheduling (i.e. by 0800 hrs of 'S-3' day with 'S' being the day of scheduling) so as to configure these details in the scheduling system. The requisite information shall be provided in the Web based Scheduling Software (WBES).	To generalise the bilateral T-GNA, irrespective of exchange trade or outside trade the same provision to be made effective
34		Once Power exchange fetch NOC for DAM at 10.00Hrs., will there be any chances of revision of standing clearances issued by NLDCs/SLDCs. If yes, it is requested that the revised NOC should be provided in NOAR API in a separate TAB, which will be having only revised NOC to ensure proper control and verification of updation in trading system at our end. In case of forced outage how NOAR will intimate NOC purchase status of generator to exchange.	Clause 4.3 (b): Power Exchanges shall fetch the required standing clearance data from NOAR portal by 1000 hours. Further, power exchange(s) shall ensure that the scheduling request for each registered participant is within the limit for each time block as specified by the respective SLDC/NLDC, as the case may be in the standing clearance.	Revised NOC shall be provided in the same API.
35		Clarity required on interchange flow on the various bidareas. Does power exchange need to declare flow corridor wise as per current mechanism or only import/export margin will be required to be shared with NLDC	Clause 4.3 (c): Power exchange(s) shall furnish the interchange flow on the various bid area/ control area / group of control areas along with the information of total draw and injection for each region by 1200 hours.	The current mechanism will continue
36		What will be the Procedure for intimation of curtailment of DAM & GDAM. Will exchange receive curtailment qty for both market in two different files or curtailment will be applicable on combined /DAM file.	Clause 5.1 (d)- (iii) - Within integrated day ahead market, day ahead market transaction shall be curtailed followed by the green day ahead market	The current mechanism will continue
37		For the above case what will be the procedure to curtail the draw schedule against the curtailed generation schedule as currently there is a different procedure followed by power exchange in case of real time curtailment owing to constraint in transmission line which is stipulated below:  a. All the buyers and sellers at the import and export sides will be arranged in descending order. b. Exchange will identify the Buyers and sellers upto double of the quantity required to be curtailed on buy and sell sides respectively. c. Curtailment on prorata basis will be carried on from such identified buyers and sellers. In case if the proportion of curtailment is 50% or more of the total quantity, exchange will curtail the quantity on prorata basis across all impacted portfolios. During rainy seasons in case of any realtime curtailment, exchange will curtail hydro power plants only as a last resort. d. In case of any natural calamity like flood, earthquake, strikes, etc. or events like grid failure, the Exchange will have the power to settle the Contract independently and/or in consultation with the Commission.	Clause 5.3 (b)- (iv) - The scheduled generation of all the affected regional entity generating stations supplying power under collective transactions shall be deemed to have been revised to be equal to their actual generation.	This is as per business rules and contract specification of power exchange, approved by CERC.
38		It is clearly visible from above that \$1 can be scheduled upto 300 MW since there was a residual from \$3 margins upto 110 MW. So, a Net loss of 60 MW is accrued which can be avoided by simultaneously solving all the congested areas.	Grid-India workshop on T-GNA procedure: Example Case 4 on allocation of transmission corridor	The balance margin will be utilized in subsequent scheduling. Further, optimization of scheduling is also being explored.
39	Currently, the Power Exchanges are providing following data in the provisional solution of Collective Transaction (Block- wise) - i. Injection and Draw data of all Regions (NR, SR, WR, SR and AR). ii. Inter-Regional flow requirement on inter-Regional corridors/links (AR To ER, ER To AR, ER To NR, ER To SR, ER To WR, NR To ER, NR To WR, SR To ER, SR To WR, WR To ER, WR To NR, WR To SR). iii. Regional Entities wise injection and Draw. We understand that the power exchanges will continue to provide the above data in its provisional solution.	Clause 4.3(c): Power exchange(s) shall furnish the interchange flow on the various bid area/ control area / group of control areas along with the information of total draw and injection for each region by 1200 hours	In addition to these new bid area transactions to be included	
40	Currently NLDC is providing the following information to the exchanges- i. Region wise (NR, SR, WR, SR and AR) import and export. ii. Inter-Regional corridors/links availability (AR To ER, ER To AR, ER To NR, ER To SR, ER To WR, NR To ER, NR To WR, SR To ER, SR To WR, WR To ER, WR To NR, WR To SR). iii. Bid Area wise available import/export (W3, N3, S2+S3 and S3). We understand that besides the new bid areas (States) Import/Export, the information regarding inter-regional corridor/links availability will still be made available to Power Exchanges which is also stated in Format F (Scheduling Request for Collective Transaction under T-GNA) of "Draft Procedure for Grant of T-GNA to the ISTS through NOAR".	Clause 4.3(d): "Based on the information furnished by power exchange(s) and the available margin, NLDC shall check for congestion through NOAR. If there is no congestion, NLDC shall send a Nil congestion report to the power exchanges, so that the applications can be accepted and scheduled subsequently. However, in case of congestion, NLDC shall inform the power exchange(s) by 1230 hours through NOAR regarding the period of congestion and the available scheduling limit on each bid area/ control area/ group of control areas, in the respective power exchange."	Yes	
41	Further, it is requested to continue declaring corridor wise TTC/ATC and provide the same in the Exception Report (margin) to Power Exchanges for Collective Transactions	Overall Procedure	Yes, exception report will be provided as being done currently.	
42	a. Regulation 36.1 and 36.2 of the GNA Regulations provides that a GNA/T-GNA grantee shall be eligible to schedule power within the GNA/T-GNA granted to it under any contract. In other words, long term and short-term transactions can be scheduled both under GNA as well as T-GNA.  b. From the draft corridor allocation procedure, it is not very clear how the scheduling of short-term transactions will take place under GNA, specifically for Exchange traded bilateral transactions.  c. Further, under para 4.1(a) of the draft procedure, the GNA grantees are required to furnish details of contract/power purchase agreements at least three days prior to scheduling. In this regard the details required for Power Exchange transaction may also be incorporated.  d. In view of the above, it is requested to incorporate appropriate provision for scheduling of power exchange based bilateral transactions under GNA.	Clause 4.1 (a): Respective SLDCs on behalf of the intra-state entities which are drawee GNA grantees shall furnish the details of the contracts/power purchase agreements (PPAs) including the injection point at least 3 days prior to the day of scheduling (i.e. by 0800 hrs of 'S-3' day with 'S' being the day of scheduling) so as to configure these details in the scheduling system. The requisite information shall be provided in the Web based Scheduling Software (WBES).  Other drawee GNA grantees which are regional entities shall also furnish the details of the contracts/PPAs including the injection point at least 3 days prior to the day of scheduling (i.e. by 0800	Included	

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43	ITC	<p>As per the above proposed mechanism, an affidavit sought for each schedule revision and the said affidavit is specific to where PPA/s entered between the seller and a buyer. Whereas, there is no requirement of any PPA's for a captive use since both injection &amp; draw is within the same Company. However, the same affidavit being insisted from the captive users too, though there is no buyer &amp; seller and no PPA's exists in the captive transaction. Therefore, we request NLDC to exclude / remove the requirement of an affidavit for captive users.</p> <p>Similarly, an INDEMNITY BOND is also sought for every schedule revision. We didn't find any application of such Indemnity Bond since all the Stakeholders including all the Nodal agencies should follow the time to time Regulations, Orders and the directions of the respective Commission/s and no such mention / clarity in the said Indemnity Bond. The Electricity Act,2003 has already addressed the disciplinary actions for Noncompliance of the Regulations, Order and directions of the respective Commission/s.</p> <p>Therefore, it is requested to withdraw requirement for Indemnity Bond for schedule revision. However, the term / pre-condition like "Submission of this schedule revision &amp; its acceptance is subjected to provisions of Central Electricity Regulatory Commission Connectivity and GNA Regulations, 2022 and time to time Regulations, Orders &amp; directions of the respective Commission/s may be incorporated for submission of schedule revision.</p>	<p>Mechanism for revision of schedule of the short-term open access schedules accepted by the nodal RLDGs in case of "Advance Scheduling" or "First-Cum-First Served Basis"</p>	<p>Addressed in "Procedure for Grant of Temporary General Network Access (T-GNA) to the inter-State Transmission system through National Open Access Registry (NOAR)"</p>
44	New Age Markets	<p><b>Need to recognise the OTC Market and OTC Platform in the draft procedure:</b></p> <p>The GNA Regulations were notified in June 2022, while Central Electricity Regulatory Commission (Power Markets) Regulations 2021 ("PMR 2021") was notified in August 2021. PMR 2021 introduced the concept of an independent OTC Platform in the power markets for the stakeholders, and provided for establishing and operating of an OTC Platform as a regulated market infrastructure institution. Thereafter, detailed guidelines were issued by the CERC for Registration and Filing of Application for setting up of OTC Platform.</p> <p>Hon'ble Commission, vide their order dated September 29, 2022 in the petition 157/MP/2022, has granted the permission to New Age Markets in Electricity Private Limited for establishing and operating the OTC Platform.</p> <p>In the subsequent staff paper issued, OTC Market &amp; OTC platform on one side and Power Exchanges on the other have been categorised as part of the Institutional Arrangements for Short-term transactions. In light of the above, it is appropriate that the draft procedure recognises the OTC Platform and has enabling provisions towards the envisaged regulatory role.</p>	<p>General Procedure</p>	<p>No specific comments. All generalised comments.</p> <p>The procedure has been prepared in line with the CERC GNA Regulations, 2022 and IEGC 2023.</p>
45		<p><b>Need to incentivize market participants for early and prompt reporting:</b></p> <p>The need to incentivize the market participants for prompt regulatory reporting leading to confirmation and nomination for scheduling is sine qua-non for creating a digital ecosystem for power markets. The prompt, early and adequate regulatory reporting will introduce operational efficiency and effectiveness by better administration of the corridor and also providing advance signals to the markets on any built up of congestions.</p> <p>This assumes additional importance as we move from a regime wherein time stamp of the application defined the nature and process for allocation of corridor and scheduling of transactions, to the new regime wherein availability of corridor and scheduling is deemed available, we need to introduce incentives for prompt and early reporting of the contracts by the market participants. Two, we need to further the discipline introduced and enforced by the system operator by nudging market participants to move from passive reporting to active reporting i.e. the grid connected entities either reporting themselves or confirming the reporting done on their behalf, prior to acceptance for scheduling. This will reduce the information asymmetry with the grid connected entities and ensure that only matched, confirmed and balanced contracts are taken up for scheduling.</p> <p>This will enable the system operator and the market participants to work out the building up of congestion during the day, during the season in a particular corridor. Two, in absence of this information, the seasonal, diurnal yet cyclical movement of the demand will not be ascertained.</p> <p>We suggest to include suitable provisions to nudge market participants to report, confirm and nominate the transactions through OTC Platform so that reporting, verification, triangulation etc. can be done prior to being considered for scheduling.</p> <p>One of the provisions could be to continue with the earlier practice of LIFO (Last In First Out), in case of congestion, for bilateral transactions.</p> <p>The transaction facilitated through the OTC platform are also decided by multiple buyers and multiple sellers and hence need to be treated as collective in nature. Further, the OTC platform be recognized as a service provider/applicant for seamless integration of application process through API on behalf of the Member.</p>	<p>General Procedure</p>	<p>No specific comments. All generalised comments.</p> <p>The procedure has been prepared in line with the CERC GNA Regulations, 2022 and IEGC 2023.</p>
46		<p><b>Need to integrate and define a communication protocol through API between OTC Platform and NoAR:</b></p> <p>NoAR needs to be integrated with OTC platform through APIs for data sharing with us so that reporting etc. can all be linked to a single reference i.e. NOAR Unique id. This will not only ensure ease of doing business for the market participants wherein the requirement to collect data by market intermediaries is reduced but also ensure convergence through technology which in turn will lead to better compliances towards an adequately reported market.</p>	<p>General Procedure</p>	<p>Implementation of the suggestions requires regulatory directions</p>

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47	Power Company of Karnataka Limited (PKCL)	Power System Operation Corporation (POSOCO) Name of the power system operation corporation needs to be changed as Grid Controller of India limited	Clause 2.6: 'Power System Operation Corporation (POSOCO)' means the wholly Government owned independent Company notified by Central Government under Section 26 and subsection (2) of section 27 of the Act vide notification dated 19th December 2016. POSOCO is operating all the five RLDCs and the NLDC w.e.f. 1st October, 2010	Incorporated
48		Assessment and Declaration of Transfer Capability Though the Renewable projects are not liable for payment of transmission charges, to calculate TGNA margin, the quantum of renewable projects connected to grid have to be considered before arriving the TGNA margin. The same needs to be included in the procedure.	Clause 3.2 e): The State Load Dispatch Centres (SLDCs), in consultation with Regional Load Dispatch Centres (RLDCs) shall assess the Total Transfer Capability (TTC), Available Transfer Capability (ATC) and Transmission Reliability Margin (TRM) of the individual control/bid areas within the region. Regional Load Dispatch Centres shall assess TTC, TRM and ATC for the group of control/bid areas within the region (if required). The computed TTC, TRM and ATC figures shall be published on the website of respective SLDCs and RLDCs, along with the details of basis of calculations, including assumptions, if any, at least eleven (11) months in advance. The specific constraints indicated by the	All the generation dispatches as per the scenario for which the TTC is being computed need to be considered.
49		Allocation of Transmission Corridor and Scheduling of Advance Application Category to consider T-GNA transfer quantum of GNA grantee in the formulae specified to arrive Margin of T-GNA transactions.	Clause 4.2 c): The T-GNA grantees shall furnish the time block wise requisition for drawl for the advance T-GNA applications to the concerned RLDC in accordance with the contracts by 0800 hours of S-1 day in Web based Scheduling Software (WBES).	Already considered.
50		The revision of T-GNA twice a day may be allowed and the provision needs to be made in the procedure.	Clause 4.3: Allocation of Transmission Corridor and Scheduling of Collective Transactions	This provisions are as per the GNA regulations and IEGC, 2023.
51		The application for grant of exigency T-GNA for bilateral transactions, allowed for scheduling with a minimum start time of 7 or 8 time blocks. However, in all transactions allowed time for scheduling is T+5/T+6 time blocks. It is requested for considering 5 or 6 blocks against the proposed 7 or 8 time blocks for exigency scheduling.	Clause 4.4 b): An application for grant of exigency T-GNA for a bilateral transaction through NOAR may be submitted on (5) day for grant of T-GNA with scheduling for (5) day or (5+1) day or (5+2) day, with a minimum start time of 7 (seven) or 8 (eight) time blocks, as the case may be from the time of approval of the T-GNA application.	The timelines are as per the GNA regulations. The comment is outside the purview of the procedure. Requires regulator change.
52	Punjab State Power Corporation Limited (PSPCL)	The T-GNA grantees shall furnish the details of the power purchase agreements (PPAs)/or other relevant document of acceptance between injecting/drawee entity. Timeline of intimation the same may please be considered as 11:00 hrs. It is also requested that WBES software for GNA/T-GNA must have the seamless provision switching over to alternate source in existing arrangement.	Clause 4.2 (b): The T-GNA grantees shall furnish shall furnish the details of the power purchase agreements (PPAs) including the injection point at least 3 days prior to the day of scheduling (i.e. by 0800 hrs of 'S-3' day with 'S' being the day of scheduling) so as to configure these details in the scheduling system. The requisite information shall be provided in the Web based Scheduling Software (WBES).	Modified in procedure as suggested.
53		As per existing practice, Bilateral transactions applications submitted upto 15:00 hrs are considered under Day ahead whereas applications submitted after 15:00 hrs are considered under contingency applications. In the new GNA regulations 2022 cut of time 15:00 hrs has been changed to 13:00 hrs. In this regard it is requested the cut-off time for applications under Day ahead may please be considered upto 15:00 hrs. As reduction of time for completing procedure formalities for bilateral transaction can affect optimization by Discom.	Clause 4.2 (f): In case, any T-GNA grantee does not schedule power up to its T-GNA quantum at the time of making the scheduling request, the unutilised quantum of T-GNA shall be released in the following sequence for: i. Collective transactions under day ahead market ii. Bilateral transactions under exigency T-GNA applications for applications received till 1300 hrs of S-1 iii. Bilateral transactions under exigency T-GNA applications for applications received after 1300 hrs of S-1 iv. Schedule revision by GNA grantees v. Collective transactions under real time market	The provision is as per the timelines specified in the regulations and the comment, therefore, is out of scope for this procedure. Requires regulatory changes.
54		As mentioned in this clause that applications received till 13.00 hrs will be process by RLDC in FCFS basis and in this manner initially filed application will be cleared fully and application filed thereafter can be curtailed/rejected depends on the ATC/TTC. In this regard it is requested to process the applications till 15:00 hrs, as mentioned in comments of 4.2(f).	Clause 4.4 (d): RLDCs shall process applications received till 1300 hours of the day immediately preceding the day of scheduling through NOAR on first-come-first-served basis by 1400 hours of the day immediately preceding the day of scheduling.	The provision is as per the timelines specified in the regulations and the comment, therefore, is out of scope for this procedure.

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S.No.	Stakeholder Name	Stakeholder Comment	NLDC Procedure Clause (Clause nos. pertain to the draft procedure which was uploaded for stakeholder consultation; clause nos. in final procedure submitted to CERC may differ)	NLDC Comments
55		<p>1. As per the extant CERC regulation (Connectivity and General Network Access to the inter-State Transmission System-2022), injection point is to be intimated by 5-1 day at 08:00 hrs. However, as per the procedure specified in the proposed draft, it should be intimated by 5-3 days (5 being the scheduling date), which is not in syne with the provisions of the extant regulation.</p> <p>2. From a network access perspective, it is the technical parameters like injection point which are relevant. Commercial and price sensitive data may not be relevant and therefore, may be masked while sharing the PPA (like energy rate, trading margin, rebate, surcharge, compensation).</p> <p>3. In case of T-GNA, as standard market practice, the PPA is signed at a later stage. However, buying entities/utilities insist for immediate scheduling based upon issuance of Letter of Intent (LOI), Letter of Award (LOA) or a similar form of Letter etc. Hence, apart from the PPA, other relevant document(s) may be allowed to be submitted in the WBES.</p> <p>4. As per the draft T-GNA procedure (dt. 06-10-2022) issued by Grid Controller of India (formerly POSOCO), PPA &amp; Schedule were to be submitted in the NOAR Portal. Whereas as per the proposed procedure under these draft guidelines, PPA &amp; Schedule are to be submitted in WBES. Therefore, the procedure may be clearly articulated.</p>	<p>Clause 4.1 (a) "Respective SLDCs on behalf of the intra-state entities which are drawee GNA grantees shall furnish the details of the contracts/power purchase agreements (PPAs) including the injection point at least 3 days prior to the day of scheduling (i.e. by 0800 hrs of '5-3' day with '5' being the day of scheduling) so as to configure these details in the scheduling system. The requisite information shall be provided in the Web based Scheduling Software (WBES). Other drawee GNA grantees which are regional entities shall also furnish the details of the contracts/PPAs including the injection point at least 3 days prior to the day of scheduling (i.e. by 0800 hrs of '5-3' day),</p> <p>And</p> <p>As per clause 4.2(b) "The T-GNA grantees shall furnish the details of the power purchase agreements (PPAs) including the injection point at least 3 days prior to the day of scheduling (i.e. by 0800 hrs of '5-3' day with '5' being the day of scheduling) so as to configure these details in the scheduling system. The requisite information shall be provided in the Web based Scheduling Software (WBES).</p>	<p>1. The details of the contracts/power purchase agreements (PPAs) including the injection point at least 3 days prior to the day of scheduling (i.e. by 0800 hrs of '5-3' day with '5' being the day of scheduling) is required so as to configure these details in the scheduling system on time.</p> <p>Further 0800 hrs has been changed to 1100 hrs as per request of some of the stakeholders.</p> <p>2. and 3 - Shall be taken care of in the WBES portal</p> <p>4. Details are to be submitted in WBES portal for scheduling purpose</p>
55		<p>5. There are specific instances where the procedural aspects may not be easy to comply. As an illustration, if we submit an Advance T-GNA application on 01-10- 2022 for the period 04-10-2022 to 15-10-2022, the T-GNA Approval for the same shall be issued on 02-10 2022 as per the proposed timelines in the procedure. Therefore, the T-GNA grantee may not be able to furnish the PPA details along with the injection point by the 5-3' day. Such cases need clarification on the form and manner of compliance to the procedures.</p> <p>6. As per the extant CERC regulations (Connectivity and General Network Access to the inter-State Transmission System-2022) clause no.33.3 "T-GNA grantee under Advance application category may request to schedule power up to its T-GNA quantum at the time of making scheduling request, before the opening of bidding window for collective transactions under day ahead market for the next day". However, as per the draft procedure proposed under these rules, it is restricted till 08:00 A.M. which is a definitive timeand needs to be synced with the time of "before the opening of bidding window "or, collective transactions under day ahead market" for the next day as per the extant CERC regulations.</p> <p>7. A system to send automatic reminders/alerts to be sent to the T-GNA grantee to furnish the PPA details as per this procedure may be set up for ease of operations.</p> <p>8. In the case of applying for advance T- GNA, as per the extant CERC regulations (Connectivity and General Network Access to the inter-State Transmission System-2022) clause 33(d) PPA &amp; PSA both are to be submitted. Whereas as per the proposed procedure, only PPA is required to be submitted. This may be examined from a consistency perspective.</p>	<p>As per clause 4.1 (c),</p> <p>"RLDCs shall check if drawl schedules as requisitioned by the drawee GNA grantees can be allowed based on the available transmission capacity. For this, the RLDCs shall check the availability of the corridor for each and every time block of the next day against the available regional import/export transfer capability followed by intra-regional import/export transfer capability and import/export bid area transfer capability.</p> <p>This process shall be carried out for all the bid area (s) / control area / group of control areas. Provided that in case of any constraint in the transmission system, the available transmission corridor shall be allocated to the drawee GNA grantees in proportion to their granted GNA within the region or from outside the region, depending upon the transmission constraint, whether it is within the region or from outside the region, as the case may be.</p> <p>As per clause 4.2 (d) "RLDCs shall check if the drawl schedules as requisitioned by the drawee T- GNA grantees can be allowed based on the available import/export transfer capability..... Provided that in case the</p>	<p>5. and 6 - Suitable provision added for such cases:</p> <p>"...However, for Intra Day, Day Ahead Contingency (DAC), Term Ahead, Green Intra Day, Green Day Ahead Contingency (DAC) and Green Term Ahead contracts, the window shall remain open on the day of the operations also..."</p>
56	PTC India	<p>Given, the necessity to promptly adjust the drawl schedules in case of transmission congestion, a suitable mechanism should be in place for communicating drawl schedules to the GNA&amp;T-GNA grantees promptly. The communication procedure and protocols are not specified in the proposed procedures</p>	<p>As per clause 4.1 (c),</p> <p>"RLDCs shall check if drawl schedules as requisitioned by the drawee GNA grantees can be allowed based on the available transmission capacity. For this, the RLDCs shall check the availability of the corridor for each and every time block of the next day against the available regional import/export transfer capability followed by intra-regional import/export transfer capability and import/export bid area transfer capability.</p> <p>This process shall be carried out for all the bid area (s) / control area / group of control areas. Provided that in case of any constraint in the transmission system, the available transmission corridor shall be allocated to the drawee GNA grantees in proportion to their granted GNA within the region or from outside the region, depending upon the transmission constraint, whether it is within the region or from outside the region, as the case may be.</p> <p>As per clause 4.2 (d) "RLDCs shall check if the drawl schedules as requisitioned by the drawee T- GNA grantees can be allowed based on the available import/export transfer capability..... Provided that in case the</p>	<p>Communication would be made as per the current practice - through mail.</p>
57		<p>We propose that clause 5.3(b) may be elaborated so that different sub-provisions when read together are consistent in terms of procedure. As per our assessment post reading of the clauses, schedules shall be revised after declaration of grid disturbance by RLDC. However, if we read clause no. 5.3(b)(vi), am ambiguity in terms of specifics may be clarified. As per clause 5.3(b)(vi), the generation and drawl schedules revised by the RLDC shall become effective from the 7th block or 8th time block depending on the block in which the schedule has been revised as first block. This defines specific time blocks in which the revision becomes effective.</p>	<p>As per clause 5.3(b)(i) "In case of any disturbance of GD-5 category, scheduled generation of all the affected regional entity generating stations supplying power under bilateral transactions shall be deemed to have been revised to be equal to their actual generation for all the time blocks affected by the grid disturbance.</p> <p>As per clause 5.3(b)(v) "The declaration of grid disturbance shall be done by the concerned RLDC at the earliest. A notice to this effect shall be posted at its website by the RLDC of the region in which the grid disturbance has occurred which shall be considered as declaration of the grid disturbance by RLDC. All regional entities shall take note of the grid disturbance and take appropriate action at their end."</p> <p>As per clause 5.3(b)(vi) "The generation and drawl schedules revised by the RLDC shall become effective from 7th block or 8th time block depending on the block in which the schedule has been revised as first block.</p>	<p>Clarified in the procedure.</p>
58		<p>1. There should be some provision in the NOAR portal where real time update about corridor availability in the T-GNA category may be reflected. This will lead to better planning by the potential applicants. Additionally, it will not lead to unnecessary processing by the system operator as an application will not filed if there is no availability in the corridor for allowing T-GNA.</p> <p>2. Intimation procedures and protocols in the case of curtailment &amp; restoration may be formalized for better utilization of available resources.</p>	<p>General Procedure</p>	<p>1. Information is being provided through NOAR as per CERC GNA regulations.</p> <p>2. Already incorporated in the procedure.</p>

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59	ReNew Power Private Limited	This clause is in contradiction with Clause 11 (Revision of T-GNA) of POSOCO's draft procedure for T-GNA dated 6th Oct'22 which states that T-GNA granted under advance application category for a period of more than 30 days may be reduced for the balance period with a prior notice of clear 30 days by the T-GNA grantee. In addition to this, we wish to submit that, unlike conventional generating stations, generation in case of RECS/RHGS (wind, solar, hydro) is not under the control of developer but is highly weather dependent. Hence, in order to manage real time weather surprises and to avoid over/under injection, RECS/RHGS should be allowed to revise their T-GNA schedule from 7th or 8th time block, as the case may be) and/or enter into the contract to manage that variation (purchase from exchange/bilateral), whatever is convenient to them. This will not only ensure grid security (over/under injection shall be managed) but also encourage developers to come up to with more and more merchant renewable capacity	Clause 5.3: Revision of Schedule under T-GNA: Scheduled transactions under T-GNA once scheduled can't be revised other than in case of congestion management as mentioned in 6.1 of this procedure and following cases: (a) Revision due to forced outage of a generator (b) Revision in case of Grid disturbance of category GD-5	Grant and scheduling are different activities. GNA granted under advance application category for a period of more than 30 days may be reduced for the balance period with a prior notice of clear 30 days by the T-GNA grantee. However, schedule under T-GNA can't be revised as per IEGC.
60		There should not be any capacity (MW) linked restriction for revising the schedule under forced outage. In order to ensure grid security, all the generating entities, including wind, solar, hydro etc., which are connected to ISTS (CTU connected) should be allowed to revise the schedule in case of forced outage. Also, since unit size is not defined in case of wind and solar generators and also their generation is totally weather dependent, they should be allowed to revise the schedule to manage the variation in their schedule (over/under injection), and such variation could be due to any reason whatsoever	Clause 5.3 (a): Revision due to forced outage of a generator: Scheduled transactions shall be revised in case of forced outage of a unit of a generating station having capacity of the said unit size as 100 MW and above. Extant regulations and NLDC T-GNA procedure shall be referred for carrying out such revisions.	Capacity linkage has been removed in final IEGC and same is also suitably modified in the procedure.
61	SLDC Punjab	NIL	-	-
62	SLDC Telangana	In the procedure for allocation of transmission corridor for GNA grantee and T-GNA Grantee, it was mentioned that the contracts/injection points/PPA have to be intimated on 5-3 days for scheduling on 5 day, At present only on 5-1 day is being intimated. The significance of intimation of contracts on 5-3 day was raised by many States in the meeting conducted on 01.12.2022. It was clarified that the same will be reviewed in line with Grid code -2022(Draft) and will be taken up accordingly. Hence, the procedure may be finalized in line with Grid code -2022 strictly and not (5-3) day basis as it impacts flexibility of operation.	4.1. Allocation of Transmission Corridor and Scheduling of Transactions under GNA  (a) Respective SLDCs on behalf of the intra-state entities which are drawee GNA grantees shall furnish the details of the contracts/power purchase agreements (PPAs) including the injection point at least 3 days prior to the day of scheduling (i.e. by 0800 hrs of 'S-3' day with 'S' being the day of scheduling) so as to configure these details in the scheduling system. The requisite information shall be provided in the Web based Scheduling Software (WBES)	The details of the contracts/power purchase agreements (PPAs) including the injection point at least 3 days prior to the day of scheduling (i.e. by 0800 hrs of 'S-3' day with 'S' being the day of scheduling) is required so as to configure these details in the scheduling system on time.  Further 0800 hrs has been changed to 1100 hrs as per request of some of the stakeholders
63		It is understood from the procedure that, if draws including all transactions comes under the GNA quantum there is no need of applying for T-GNA. It is understood that the deviation will be levied only when overall GNA will be deviated and inside the region and outside the region GNA will be considered only when the transmission constraints observed. This may be clearly mentioned in the procedure.	-	As per the GNA regulations and the scheduling procedure, the GNA/T-GNA grantees are eligible to schedule power within the GNA/T-GNA granted to them under any contract subject to conditions specified in the Grid Code.
64	SLDC Uttar Pradesh	Due to uncertainty in commissioning of the transmission network caused by ROW and other issues, the 11 month horizon for calculation of TTC may not be accurate. Therefore it is requested to consider cutting short this horizon of 11 month.	Clause 3.2 (e) which reads "....." The computed TTC, TRM and ATC figures shall be published on the website of respective SLDCs and RLDs, along with the details of basis of calculations, including assumptions, if any, at least eleven (11) months in advance. The specific constraints indicated by the study shall also be published on the website.	As per GNA regulations, "T-GNA may be applied for any period from 1 (one) time block and up to 11 (eleven) months."  Therefore, the declaration of TTC/ATC on 11 month ahead basis is required. Further, Fine tuning close to real time can be done.
65		Kindly elaborate and explain the export TTC of the state like Uttar Pradesh which is a drawee state most of the time	Clause 3.2 (e) which reads "The import and export Total Transfer Capability (TTC), Available Transfer Capability (ATC) and Transmission Reliability Margin (TRM) shall be computed for all the bid areas/control areas/group of control or bid areas where a control or bid area can be a separate region, state, union territory (UT), part of region/state/UT or any combination of the same	Export scenario is the scenario where a control area is exporting based on net inter-change. Currently, UP might not be exporting power but scenario may change in future. With large scale addition of RE, multiple control areas which were historically net import areas,
66		Clarification needed regarding the quantum which will be declared by CTUIL which SLDC needs to refer while assessing the TTC, ATC & TRM	Clause 3.2.c) The National Load Despatch Centre (NLDC), Regional Load Despatch Centres (RLDCs) and State Load Despatch Centre (SLDCs) shall refer to the quantum declared by CTUIL while assessing the TTC, TRM and ATC for the purpose of scheduling of GNA and grant/scheduling of T-GNA transactions.	Clarification required is not clear?
67		Regarding details of PPA of GNA grantees to be submitted by SLDC in 5-3 days, it is requested to provide for individual windows for each Intra State GNA grantees so that they can submit the relevant documents and also punch their individual requisitions into the WEB based Scheduling software.	Clause 4.1.a) & b) Allocation of Transmission Corridor and Scheduling of Transactions under GNA	Specific details for providing the information will be intimated separately in line with IEGC, 2023.
68	SLDC West Bengal	Regarding Margin for scheduling of advance bilateral category of T-GNA transactions:  > Import T-GNA margin = import ATC – import schedule (GNA) + 'A'% approved export (GNA) > Export T-GNA margin = export ATC – export schedule (GNA) + 'B'% approved import (GNA) Detailed method for calculations of A & B may please be deliberated and shared.	Clause 4.2.c) The T-GNA grantees shall furnish the time block wise requisition for draw for the advance T-GNA applications to the concerned RLDC in accordance with the contracts by 0800 hours of S-1 day in Web based Scheduling Software (WBES).  Margin for scheduling of advance bilateral category of T-GNA transactions: => import T-GNA margin = import ATC – import schedule (GNA) + 'A'% approved export (GNA) => Export T-GNA margin = export ATC – export schedule (GNA) + 'B'% approved import (GNA)  Where, 'A' and 'B' are the percentage export/import in the opposite direction which shall be determined by NLDC from time to time based on RE variability and other system exigencies.	The counter-flow benefit is being provided for optimal scheduling of transactions without compromising the system reliability. The counter flow values are dynamic in nature and depend on actual scheduling trend, solar generation interchange, RE variability and other system exigencies. The detailed methodology for declaration of same will be deliberated separately.
69		In calculating TTC for a state in addition to increasing the load, decreasing the generation of the internal generators of the State/control area should be included. As realistically, a state tends to increase import from the CTU-STU boundary when its internal generations get depleted	Annexure-I: Clause 3.5.3: The Total Transfer Capability between two areas shall be assessed by increasing the load in the importing area and increasing the generation in the exporting area or vice versa till the constraints are hit for a credible N-1 contingency	Both the methods will be used as specified in the clause: "The Total Transfer Capability between two areas shall be assessed by increasing the load in the importing area and increasing the generation in the exporting area or vice versa till the constraints are hit for a credible N-1 contingency"
70		For the calculation of the transient stability limit for the worst credible contingency, detailed workshops may please be held with all stakeholders regarding the detailed process for assessing transient stability	Annexure - I	Detailed workshops may be arranged as per the requirement.
71		While considering load-generation balance of four cardinal points on the monthly load curve) of a typical day of the month the ambient temperatures will be different. As the thermal limits of the transmission elements varies with ambient temperature whether there is any scope to factor that in the procedure	Annexure - I	Dynamic Line Ratings (Ambient Temperature based) will be considered as per availability of accurate weather data and line rating details.



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72		"Provided that in case of any constraint in the transmission system, the available transmission corridor shall be allocated to the drawee GNA grantees in proportion to their granted GNA within the region or from outside the region, depending upon the transmission constraint, whether it is within the region or from outside the region, as the case may be. <u>Within the request of scheduling by GNA Grantee reduction will be as per priority given by GNA Grantee</u> " Since transmission constraint is on S-1 day and curtailments are on prorata basis even the cheaper power will be curtailed. So it is better to take priority beforehand that during curtailment which transactions are to be curtailed and upto which quantum.	Clause 4.1 (c) : Provided that in case of any constraint in the transmission system, the available transmission corridor shall be allocated to the drawee GNA grantees in proportion to their granted GNA within the region or from outside the region, depending upon the transmission constraint, whether it is within the region or from outside the region, as the case may be.	In IEGC 2023, following is mentioned:  "(i) RLDC shall check if drawl schedules as requisitioned by drawee GNA grantees can be allowed based on available transmission capability. <b>Provided that in case of constraint in transmission system, the available transmission corridor shall be allocated to the drawee GNA grantees in proportion to their GNA within the region or from outside region, depending upon the transmission constraint, whether it is within the region or from outside the region, as the case may be. The same shall be intimated to drawee GNA grantees by 8.15 AM on 'D-1' day.</b> (ii) Drawee GNA grantees shall revise their requisition for drawl schedule based on availability of transmission corridors for such grantee by 8.30 AM on 'D-1' day. (iii) RLDC shall issue final drawl schedules and injection schedules for drawee and injecting GNA grantees by 9 AM on 'D-1' day."  <b>GNA grantees shall factor in merit order dispatch while submitting the revised schedule by 0830 hrs of 'D-1' day.</b>
73		"Where, 'A' and 'B' are the percentage export/import in the opposite direction which shall be determined by NLDC from time to time based on Solar generation interchange, RE variability and other system exigencies. <u>These figures would be published in NLDC /RLDC website along-with reasons</u> " Solar hours are defined and higher % of A & B can be considered. These values of A&B can be published on NLDC/RLDC for transparency.	Clause 4.2 (c) Where, 'A' and 'B' are the percentage export/import in the opposite direction which shall be determined by NLDC from time to time based on RE variability and other system exigencies	The counter-flow benefit is being provided for optimal scheduling of transactions without compromising the system reliability. As the counter flow values are dynamic in nature and depend on actual scheduling of transactions in real-time, declaration of these figures on request basis might not be feasible.
74		The clause in the Procedure is in line with Clause No.33.3 of GNA Regulations.  It is felt that unscheduled T-GNA margin should be released only for RTM because the drawl entities may change their schedule based on real time conditions.	Clause 4.2 (f): In case, any T-GNA grantee does not schedule power up to its T-GNA quantum at the time of making the scheduling request, the unutilised quantum of T-GNA shall be released in the following sequence for:  i)Collective transactions under day ahead market ii.Bilateral transactions under exigency T-GNA applications for applications received till 1300 hrs of S-1 iii.Bilateral transactions under exigency T-GNA applications for applications received after 1300 hrs of S-1 iv)Schedule revision by GNA grantees v)Collective transactions under real time market Inter-se, the revisions and exigency applications after 1400 hours shall be scheduled as per chronology of receipt of applications.	The provision is as per the clause mentioned in GNA regulations.
75	SRPC	"Where, 'M' and 'N' are the percentage export/import in the opposite direction which shall be determined by NLDC from time to time based on Solar generation interchange,RE variability and other system exigencies. <u>These figures would be published in NLDC /RLDC website along-with reasons.</u> " Solar hours are defined and higher % of M & N can be considered. These values of M & N can be published on NLDC/RLDC for transparency.	Clause 4.3 (a) : Where, 'M' and 'N' are the percentage export/import in the opposite direction which shall be determined by NLDC from time to time based on RE variability and other system exigencies.	M & N have been dropped.
76		Not Clear	Clause 4.3 (e) : In case of congestion in any of the bid area/ control area / group of control areas, the allocation of available corridor/ margin among the power exchanges shall be in the ratio of the initial trade volume in MW submitted by the respective power exchanges for the particular time block in the congested corridors. For uncongested corridor, the margin shall be the requisition in MW plus residual quantum (in that particular uncongested corridor left over after the total requisition from all power exchange in that time block) in proportional to the Integrated Day Ahead Market (IDAM) provisional volume for the	Clause is as per CERC order - 6/SJ/2022.
77		"Where, 'X' and 'Y' are the percentage export/import in the opposite direction which shall be determined by NLDC from time to time based on Solar generation interchange , RE variability and other system exigencies. <u>These figures would be published in NLDC /RLDC website along-with reasons</u> " Solar hours are defined and higher % of X & Y can be considered. These values of X & Y can be published on NLDC/RLDC for transparency.	Clause 4.4 (a): Where, 'X' and 'Y' are the percentage export/import in the opposite direction which shall be determined by NLDC from time to time based on RE variability and other system exigencies.	X & Y have been dropped
78		Clarity on S, S-1, S-2, S-3 & S+1 may be brought out in T GNA Procedure D is used instead of S	Clause 4.4 (a), (b) , (i) (k)	The terms 'D' and 'S' both indicate the same day. 'D' is being used in context of grant of T-GNA while 'S' is being used in context of scheduling.
79		Data transfer between RLDC and NOAR and vice versa with respect to 5 day(Scheduling day) May be brought out clearly.	Clause 4.4 (i) & (k)  (j)T-GNA granted under exigency application category shall be considered as schedule, which cannot be revised, except in case of transmission constraint and in view of grid security. Based on the information on scheduling in NOAR on S+1 day at 0800 hours, the information shall be transferred to RLDC scheduling application by NOAR automatically. ... (k) The same information shall be transferred from RLDC scheduling application to NOAR at 1030 hours on S+1 basis.	The clauses quoted are for the scheduling day 'S+2'.  Info. not required for external stakeholders.
80		"NLDC/RLDC/SLDC shall initiate the process of curtailment of transactions for all such bid area/ control area/ block of control areas and the same shall become effective <b>within 4 timeblocks</b> for any revision in schedule made in odd or even time blocks respectively, counting the time block in which the schedule revision made by the RLDC as first-time block." In view of the grid security, it is suggested not to wait upto 7th / 8th Time blocks.	Clause 5.1 (b) & (c) :NLDC/RLDC/SLDC shall initiate the process of curtailment of transactions for all such bid area/ control area/ block of control areas and the same shall become effective from 7th or 8th time block for any revision in schedule made in odd or even time blocks respectively, counting the time block in which the schedule revision made by the RLDC as first-time block.	Provision in the procedure is as per IEGC, 2023.