REGULATORY FLIPBOOK • CENTRAL ELECTRICITY REGULATORY COMMISSION

Cross Border Trade of Electricity Regulations, 2019

MoP Guidelines, CERC CBTE Regulations, GNA/T-GNA Alignment & the 2025 Second Amendment — Reference Edition

2019

Principal Regulations

Notified 8 Mar 2019 · Gazette No. 160, 14 May 2019

2023

First Amendment

SNA Charge introduced — 0.50 paisa/kWh on scheduled energy

2025

Second Amendment

GNA/T-GNA alignment, expanded Applicant, Due Date — notified 9 Dec 2025

MoP Guidelines + CERC Regulations + amendments + Statements of Reasons compiled • Coverage 2016–2026 • Gazette of India, Part III — Section 4

WHY IT MATTERS

This is the single regulatory framework governing every import or export of electricity across India's borders — and it was substantially rewritten in December 2025 to align with the newer GNA access regime.

At a Glance

Core facts before you read further

LEGAL BASIS

Notified under Section 178 read with Section 66 of the Electricity Act, 2003, and the MoP Guidelines on Import/Export of Electricity (Reg. 1).

KEY CHARGE

Settlement Nodal Agency (SNA) Charge — 0.50 paisa/kWh on scheduled energy, payable by neighbouring-country entities (2023 First Amendment).

WHO IT APPLIES TO

Participating Entities in India and neighbouring countries engaged in cross-border trade, plus the Settlement Nodal Agencies (Reg. 3).

BILLING

CTU Due Date is the 45th day from presentation of the bill — a concept newly defined by the 2025 Second Amendment.

CURRENT ACCESS FRAMEWORK

GNA / T-GNA — legacy long-term access, medium-term open access and short-term open access terminology was replaced by the 2025 amendment.

WHERE IT'S HEADED

2025 amendment aligned CBTE fully with the CERC GNA Regulations, 2022, and widened who can be an Applicant for cross-border access.

WHY IT MATTERS

The 2025 amendment isn't a minor refresh — it replaces the regulation's access vocabulary wholesale (LTA/MTOA/STOA → GNA/T-GNA) and touches nearly every operative regulation from 2 through 33.

Regulatory Evolution — 2016 to 2026

How the MoP Guidelines and CERC Regulations layers fit together

5 Dec 2016
MoP issues original CBTE Guidelines

18 Dec 2018
MoP Guidelines 2018 supersede the 2016 framework

8 Mar 2019
CERC notifies CBTE Regulations, 2019 (Ss. 66 & 178)

14 May 2019
Principal Regulations published — Gazette No. 160

26.02.2021
DA approval Procedure first issued

15/26 Dec 2023
First Amendment notified/gazetted — SNA Charge framework

12 Aug 2024
MoP amends Guidelines Cl. 5.2(a) & 8.9 (connected generating stations)

9 Dec 2025
Second Amendment notified — GNA/T-GNA alignment

8 Feb 2026
Statement of Reasons issued for Second Amendment

Sep 2026
This edition — current consolidated position

WHY IT MATTERS

Two separate instrument tracks run in parallel here — MoP's policy Guidelines (2016 → 2018 → 2024 OM) and CERC's binding Regulations (2019 → 2023 → 2025) — and the 2025 CERC amendment was drafted specifically to catch up with MoP's 2024 change.

Regulatory Architecture & Institutional Roles

Reg. 4 — who does what

MoP

Ministry of Power — sets policy and issues the Import/Export Guidelines that CBTE operates under.

CERC

Regulatory framework for cross-border transactions, transmission, scheduling and settlement (this regulation).

Designated Authority (DA)

Facilitates approvals and lays down the import/export procedure; coordinates with the neighbouring country's authority.

CEA

Statutory technical and power-system planning functions; issues Connectivity technical standards.

CTU / CTUIL

Transmission-system interface; grants Connectivity and GNA; bills, collects and disburses transmission charges.

NLDC / RLDC / SLDC

System operation, scheduling and grid-security; NLDC grants T-GNA and bills T-GNA transactions.

Settlement Nodal Agency (SNA)

Settles grid-operation, deviation and other charges for neighbouring-country entities; member of the deviation/reactive-energy pools.

Participating Entities

Cross-Border Customers undertaking the actual import/export transactions under the framework.

WHY IT MATTERS

CTU and NLDC split the access function by duration — CTU grants Connectivity and GNA, NLDC grants T-GNA — so an applicant's first procedural question is always which of the two it needs to approach.

Key Definitions — Consolidated Position

Reg. 2, as it reads after the 2025 Second Amendment

CBTE

Import or export of electricity between India and neighbouring countries, including transactions across India involving neighbouring countries.

CBTL

The cross-border transmission link between Indian and neighbouring-country systems, including specified dedicated connections.

Applicant

A neighbouring-country participating entity, an Indian electricity trading licensee, or a specified Indian generating station electrically connected to a neighbouring country (widened in 2025).

Connectivity

Connection to the Indian Grid for entities covered by these regulations.

Cross-Border Customer

An entity granted GNA or T-GNA for cross-border trade (redefined in 2025 — previously tied to LTA/MTOA/STOA).

Due Date

The 45th day from presentation of the CTU bill — a new definition inserted by the 2025 amendment.

ATC

Transfer capability available for scheduling cross-border transactions under GNA/T-GNA, considering network security.

Communication Regulations

CERC Communication System for inter-State transmission of electricity Regulations, 2017 — expressly referenced from 2025 onward.

WHY IT MATTERS

Four of these eight definitions — Applicant, Cross-Border Customer, Due Date and Communication Regulations — were added or substantively rewritten by the 2025 amendment alone; treat older summaries of this regulation with caution.

Eligibility & Participation

Who can be an Applicant — expanded by the 2025 Second Amendment

APPLICANT DEFINITION — NOW INCLUDES

- The relevant neighbouring-country participating entity (as originally enacted)
- An Indian electricity trading licensee engaged in cross-border trade — added 2025
- A generating station located in India and electrically connected to a neighbouring country through dedicated transmission line(s) — added 2025

WHAT THE 2025 SOR RECORDS

- The Statement of Reasons records acceptance of the proposal so that an Indian generating station connected to a neighbouring country may seek Connectivity with the Indian Grid
- Neighbouring-country entities remain subject to recognition, approvals and the applicable cross-border framework
- Modalities for such an entity are set out in a new Annexure-I (Reg. 10(7))

Practical check: identify the applicant, its location, its electrical connection, the intended market route and the proposed transmission arrangement before starting the approval process (front-matter practical note).

WHY IT MATTERS

This change lets an Indian generator connected directly to a neighbouring country's grid become a CBTE Applicant in its own right — previously that route wasn't explicitly provided for.

Scope & Transaction Routes

Reg. 3 — who is covered and how a cross-border deal can be structured

APPLICABILITY (REG. 3(1))

- Applies to Participating Entities in India and neighbouring countries engaged in cross-border trade, and to the SNAs
- Indian entities seeking Connectivity/GNA/T-GNA purely for domestic purposes remain governed by the GNA Regulations

FOUR TRANSACTION ROUTES (REG. 3(2))

1. Bilateral agreement between two countries
2. Bidding route
3. Mutual agreements between entities
4. Through the Indian Power Exchange, in terms of Regulation 6 — added 2025

WHY IT MATTERS

Tripartite agreements get a special carve-out: cross-border trade across India (i.e., transiting Indian territory) is allowed only under the overall bilateral framework between the Government of India and each neighbouring country involved, not a private tripartite deal alone.

Designated Authority & Approval Workflow

The gate every cross-border transaction passes through

APPROVAL PATHWAY (5 STEPS)

1. Identify the transaction structure — IGA/project-specific, bilateral, entity-to-entity or exchange
2. Check whether Designated Authority approval is required
3. Determine Connectivity and GNA/T-GNA requirements
4. Confirm transmission capability, CBTL, scheduling and settlement arrangements
5. Complete commercial, transmission and payment-security documentation

APPROVAL DOSSIER — WHAT DA REVIEWS

- Counterparty and the governing government framework
- Capacity / quantum and source-destination
- Transmission path, scheduling route and metering
- Commercial arrangement and payment security

Indian entities may import/export directly or through trading licensees after approval. Neighbouring-country entities may trade through a licensed Indian power trader, subject to the DA framework.

WHY IT MATTERS

Project-specific IGA arrangements and other transaction structures follow different approval pathways under the 2019 Statement of Reasons — confirm which pathway applies before assembling the dossier, not after.

Connectivity, GNA & T-GNA

Regs. 8–12 — the three forms of access to the Indian Grid

Access Type	Who Grants It	Application Fee	Security Required
Connectivity	CTU	Rs 5 lakh + taxes	Application BG (Conn-BG1) Rs 50 lakh
GNA	CTU	Rs 5 lakh + taxes	Application BG + Access BG Rs 5 lakh/MW (Reg. 15)
T-GNA	NLDC	Rs 5,000 + taxes, per application	Per GNA Regulations

Connectivity grants physical connection only — it confers no transmission-access rights. GNA/T-GNA must be obtained separately before any power can actually be interchanged with the Indian Grid (Reg. 8(2)(a), 10(5)).

2025 ALIGNMENT WITH THE GNA REGULATIONS, 2022

- Legacy long-term access / medium-term open access / short-term open access references were replaced throughout by GNA / T-GNA
- Except where specifically provided in these regulations, the GNA Regulations apply mutatis mutandis to cross-border participating entities (Reg. 8(3))

WHY IT MATTERS

Update any CBTE templates, approval notes, contracts or transmission models that still reference LTA/MTOA/STOA — the amended text now speaks only in GNA/T-GNA terms.

Application Fees & Bank Guarantees

Regs. 9–10, 15 — the commercial gate before access is granted

Instrument	Amount	When It Applies
Connectivity/GNA application fee	Rs 5 lakh + taxes	Filed with the Connectivity or GNA application (Reg. 9(1))
T-GNA application fee	Rs 5,000 + taxes, per application	Filed with the T-GNA application (Reg. 9(3))
Application Bank Guarantee (Conn-BG1)	Rs 50 lakh per application	Connectivity application (Reg. 10(2)(c))
Access Bank Guarantee	Rs 5 lakh/MW of GNA sought	Filed with the GNA application (Reg. 15(1))
One-time connectivity charge	Rs 1 lakh/MW	One month before physical connection (Reg. 10(8))
Payment-security Letters of Credit	2.1× average monthly bill — one to CTU, one to SNA	At least 90 days before Transmission Access commences (Reg. 33)

Access Bank Guarantee is progressively returned — one-fifth of its value each year once the Cross Border Customer begins availing the GNA (Reg. 15(6)). Application BG is returned within 30 days of the Commercial Operation Date.

WHY IT MATTERS

The Access Bank Guarantee is priced per MW of GNA, not as a flat fee — a large capacity request carries proportionately larger upfront security, on top of the fixed Rs 50 lakh Connectivity guarantee.

Cross Border Transmission Link (CBTL)

Reg. 7 — planning, implementation and who may build it

WHAT CBTL COVERS

- The physical transmission link between relevant Indian and neighbouring-country pooling stations
- Specified dedicated connections involving generating stations / drawee facilities

TWO NEW ROUTES ADDED BY THE 2025 AMENDMENT (REG. 7(2-i)–(2-ii))

- Spare capacity use — spare capacity in the Indian portion of a dedicated transmission system built by a neighbouring-country generating station can be used by other entities under open access, on payment of Reg. 30(1) transmission charges
- Third-party CBTL development — a transmission licensee may develop, operate and maintain the Indian portion of the CBTL after Government of India approval, for facilitating power transactions between neighbouring countries

WHY IT MATTERS

The 2025 Statement of Reasons names CBTL planning, implementation and transmission-charge recovery as a principal area of amendment — this is not incidental drafting, it is one of the amendment's core objectives.

Tariff Determination

Reg. 5 — how the price of cross-border power is set

Transaction	How Tariff Is Set
Import by Indian entity	Competitive bidding per the Tariff Policy, or mutual agreement between buyer and seller, under the India–neighbouring-country agreement framework
Import from hydro projects	Commission may determine tariff under the Tariff Regulations — only if the hydro generator approaches via the neighbouring Government and the Indian buyer agrees
Export by Indian entity	Mutually agreed under the bilateral framework, or discovered through competitive bidding
Government-to-Government (IGA)	Tariff already agreed under an IGA continues to apply until expiry; thereafter, bidding, mutual agreement, G2G negotiation, or Commission determination (if both parties agree)
CBTL tariff (pooling station to Indian border)	Competitive bidding, Government-to-Government negotiation, or Commission determination

WHY IT MATTERS

All charges for transmission or wheeling through the Indian grid apply on top of whichever tariff route is used — the tariff figure alone never reflects the full landed cost of a cross-border transaction.

Power Exchanges & Market Participation

Reg. 6 — trading on Indian exchanges for a neighbouring-country entity

THE ROUTE

- An Indian electricity trading licensee may, after Designated Authority approval, trade on Indian Power Exchanges on behalf of a neighbouring-country Participating Entity
- Trading is capped at the quantum specified in the DA's Approval
- All trades remain subject to the Commission's applicable exchange regulations

CHECK SEPARATELY BEFORE TRADING

- Regulatory eligibility of the neighbouring-country entity
- The approved quantum ceiling
- The trader arrangement (which Indian licensee is acting)
- Scheduling interface and settlement obligations

WHY IT MATTERS

A neighbouring-country entity cannot access an Indian Power Exchange directly — it must always trade through a licensed Indian trader acting within a DA-approved quantum, per the 2019 Statement of Reasons.

Transmission Charges & the SNA Charge

Reg. 30 — the three-part charge structure, plus the 2023 First Amendment

TRANSMISSION CHARGES (REG. 30(1))

- ISTS charges payable for drawal from the Indian Grid, as per the Sharing Regulations
- CBTL charges under Reg. 7(1)–(2): per Government-to-Government negotiation
- CBTL charges under Reg. 7(2-i)–(2-ii) (spare capacity / third-party link): recovered per Annexure-II

SNA CHARGE — INTRODUCED 2023 (REG. 30(2))

0.50 paisa (half paisa) per kWh

- Charged on the energy scheduled
- Recoverable by the SNA from participating entities located in the neighbouring countries
- The SNA must formulate a suitable payment-security mechanism to collect it

Taxes, cess, statutory duties and levies are payable separately by Cross Border Customers as per applicable Indian law (Reg. 30(3)).

WHY IT MATTERS

The SNA Charge exists specifically to fund the Settlement Nodal Agency's mandated grid-operation functions for neighbouring-country entities — it sits alongside, not instead of, ordinary transmission charges.

Payment Security & the Due Date

Regs. 15, 33, 35 — and the new 45-day billing concept from 2025

PAYMENT SECURITY MECHANISM (REG. 33)

- Established at least 90 days before Transmission Access commences
- Irrevocable, unconditional, revolving Letter of Credit to CTU — 2.1× average monthly transmission-charge bill, 1-year validity
- A second such LC to the SNA — 2.1× average monthly grid-related-charge bill, 1-year validity
- Default → the Cross Border Customer is denied access to the Indian Grid until dues are cleared

DUE DATE — NEW IN 2025 (REG. 2(x-i))

- Defined as the 45th day from the date of presentation of the CTU bill
- CTU suggested the insertion so the term used across the regulations has a fixed, defined meaning
- Access Bank Guarantee may be encashed if transmission charges remain unpaid more than 3 months past due (Reg. 15(5))

All Bank Guarantees, Letters of Credit and other payment security must be furnished in Indian Rupees, from a Nationalised Bank of India or a confirmed neighbouring-country bank (Reg. 35).

WHY IT MATTERS

Map every security instrument you hold to its charge, responsible entity, billing event, Due Date and non-payment consequence — the 2025 amendment gives 'Due Date' a fixed legal meaning it didn't have before.

Scheduling, Metering, Deviation & Settlement

Regs. 17, 25–29 — the operational cycle behind every transaction

Financial sequence:



METERING & ACCOUNTING (REG. 17, 26)

- Interface Meters (Main, Check, Standby) measure actual injection/drawal at the interconnection point
- Deviation = actual minus scheduled injection (sellers) or scheduled minus actual drawal (buyers)
- Block-wise reconciliation required between contracted, scheduled, actual and settled energy

CURTAILMENT (REG. 27) & COORDINATION (REG. 29)

- Cross-border schedules may be curtailed in case of contingency, per applicable Grid Code provisions
- NLDC/RLDC coordinate with System Operators of neighbouring countries on outages, security events and schedule changes

WHY IT MATTERS

The CERC DSM (Deviation Settlement Mechanism) framework applies alongside these regulations — deviation at the interconnection point should always be read together with the current DSM Regulations, not in isolation.

System Security & Communication Requirements

Regs. 21–24 — the operational prerequisites, plus the 2025 Communication Regulations link

SYSTEM SECURITY

- ATC is defined with network-security considerations built in — schedules stay subject to transmission capability and system constraints
- Each neighbouring country interconnected with the Indian Grid is treated as a separate control area
- Commercial commitments should be tested against TTC/ATC, outages, network constraints and curtailment provisions

COMMUNICATION & TELEMETRY (REG. 18)

- 2025 amendment expressly introduces the CERC Communication Regulations, 2017 into the CBTE definitions and Reg. 18
- Operational readiness covers communication systems, telemetry, protection, data acquisition and related interface requirements
- Cyber security obligations apply under Reg. 22

WHY IT MATTERS

Treat communication and telemetry compliance as a regulatory prerequisite, not an afterthought — the 2025 amendment ties them directly into the Communication Regulations, 2017, with cyber security obligations layered on top.

Dispute Resolution & Compliance

Reg. 34, 36–37 — escalation path, and the Commission's residual powers

1 → 2 → 3

Mutual Resolution

Participating entities attempt to resolve the dispute directly — 60 days from the dispute being raised

Government-to-Government

Unresolved after 60 days → escalated for resolution at Government level between India and the neighbouring country

International Arbitration

Still unresolved → settled through an International Arbitration Centre mutually acceptable to the parties

THE COMMISSION'S RESIDUAL POWERS (REGS. 36–37)

- Power to Relax (Reg. 36) — the Commission may relax any provision, for reasons recorded in writing, after giving an opportunity of hearing — on its own motion or on application
- Power to Issue Directions (Reg. 37) — if any difficulty arises in giving effect to these regulations, the Commission may issue such directions as necessary, on its own motion or on an affected party's application

WHY IT MATTERS

Disputes purely within Indian territory are settled under the Electricity Act, 2003 (Reg. 34(1)) — the three-stage mutual/Government/arbitration ladder applies specifically to disputes involving entities of separate countries.

Amendment Matrix — Key Changes

First Amendment, 2023 vs. Second Amendment, 2025, side by side

Area	First Amendment, 2023	Second Amendment, 2025
Notified / in force	15 Dec 2023 · Gazette 26 Dec 2023	9 Dec 2025 · in force on Gazette publication
Core change	Inserts the SNA Charge definition and Reg. 30(2) recovery mechanism	Replaces LTA/MTOA/STOA with GNA/T-GNA across ~20 regulations; widens Applicant; adds Due Date
SNA Charge	0.50 paisa/kWh on scheduled energy — newly introduced	Unchanged — carried forward
Applicant / Cross-Border Customer	Not addressed	Widened to include Indian trading licensees and connected generating stations; redefined around GNA/T-GNA
CBTL	Not addressed	Reg. 7 gains spare-capacity open access and third-party development routes
Access Bank Guarantee, fees	Not addressed	Regs. 9, 12, 15 substantially rewritten with revised fee/BG mechanics

Current position is shown once here; the original notifications and Statements of Reasons are preserved in full in the source-document library that follows this deck.

WHY IT MATTERS

The two amendments barely overlap in subject matter — 2023 is narrowly about the SNA Charge, while 2025 is a near-total vocabulary and eligibility rewrite — so citing 'the amendment' without a year risks real ambiguity.

Practical Import Workflow

End-to-end checklist for structuring an import transaction

NINE STEPS, START TO SETTLEMENT

1. Identify source country, seller, Indian buyer and transaction structure
2. Confirm the applicable government framework / IGA / bilateral arrangement
3. Determine DA approval requirement and obtain approval where applicable
4. Establish Connectivity and GNA/T-GNA requirements and transmission path
5. Confirm CBTL/transmission capacity and charges
6. Complete commercial, transmission and payment-security arrangements
7. Complete scheduling, metering, communication and operating arrangements
8. Schedule and manage deviation/settlement
9. Reconcile transmission, SNA and other charges

WHY IT MATTERS

Steps 3 and 4 are the two gates that actually take time in practice — DA approval and the Connectivity/GNA/T-GNA application cycle — so start them in parallel with commercial negotiation, not after it.

Practical Export Workflow

End-to-end checklist for structuring an export transaction

EIGHT STEPS, START TO SETTLEMENT

1. Identify Indian seller/generating station, neighbouring buyer and transaction structure
2. Confirm government/bilateral/IGA framework and DA requirements
3. Confirm Connectivity/GNA/T-GNA and CBTL availability
4. Finalise commercial tariff/contract and transmission arrangements
5. Complete scheduling, metering, communication and system-operation arrangements
6. Establish payment security and settlement arrangements
7. Schedule injection and monitor ATC/system-security conditions
8. Settle deviation and applicable transmission/SNA/other charges

WHY IT MATTERS

The import and export workflows are near mirror images — the same DA-approval, access and payment-security gates apply either direction, so a template built for one adapts quickly to the other.

Compiled for professional reference

CERC Cross Border Trade of Electricity Regulations, 2019 — MoP Guidelines, principal text, both amendments and the source-document library, compiled into one reference edition.

MANAGEMENT CHECKLIST & QUICK REFERENCE

- Transaction structure and governing framework identified
- Applicant / participating-entity eligibility confirmed (incl. 2025 expanded definition)
- Connectivity and GNA/T-GNA checked; CBTL/ATC/system-security position confirmed
- Commercial, transmission and payment-security terms documented (fees, BGs, LCs)
- Scheduling, metering, communication and settlement confirmed
- DSM/deviation and SNA charges (0.50 paisa/kWh) included in the commercial model
- Billing Due Date (45th day) and records process established

Practical note: this flipbook is a navigation and reference compilation, not a substitute for the Gazette or a legal opinion. For legal or regulatory decisions, verify the operative text against the applicable official publication.

WHY IT MATTERS

The 2025 amendment touched nearly every operative regulation — re-check any CBTE analysis written before December 2025 against this consolidated position before relying on it.