

Dear Madam,

We thank you for the subject draft which endeavors to improve the interstate sale of RE vide improved forecasting and scheduling mechanism.

However, we have certain comments / observations on proposed Imbalance mechanism of CERC. We request to pls include the same in the final version.

- Forecasting should be done only at the centralized level (say SLDC level for a given state). There is little technical value addition due to forecasting at farm level. There thus should not be any planning / provision of doing forecasting at wind farm level.
- Forecasting at relevant LDC level should be the norm. All scheduling and commercial settlement also should be done at respective LDC level.
- Any commercial impact due to imbalance should be handled at LDC level only. The same should be preferably socialized over grid costs or there should be some appropriate formula to share settlement with various developers over the state/ region.
- The band of +/- 12% should be expanded to more appropriate values depending on the previous forecasting results recorded.
- The commercial mechanism should be made independent of PPA price and REC mechanism. The commercial settlement could be reduced to
 - Under Injection / over injection within band = 0.50 INR / unit receipt
 - Under Injection outside band = 0.50 INR / unit penalty
- For over injection case of outside band operation, wherein payment is restricted to issuance of REC, it is requested that the same should apply and become effective only if the system frequency is above 50Hz.

Best Regards

Ravi

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To,

The Secretary,

Central Electricity Regulatory Commission,

3rd & 4th Floor, Chandralok Building,

36, Janpath, New Delhi 110 001

Sub: Proposed Framework on “Forecasting, Scheduling & Imbalance Handling for Renewable Energy (RE) Generating Stations based on wind and solar at Inter-State Level”.

Dear Madam,

This is in reference to the Public notice for inviting comments from the stakeholders and other interested persons on the proposed framework on “Forecasting, Scheduling & Imbalance Handling for Renewable Energy (RE) Generating Stations based on wind and solar at Inter-State Level” along with draft amendments to the enabling provisions contained in IEGC, DSM and REC Regulations.

We would like to apprise you that SunEdison Energy India Pvt. Ltd. (SEIPL) is a wholly owned subsidiary of SunEdison Inc, one of the largest manufacturers in the solar value chain with over \$ 2.5 Billion in revenue and manufacturing operations in US, Italy, Japan, Korea, Taiwan and Malaysia. SunEdison Inc is more than 50 years old and was the first company to pioneer the manufacturing of Silicon wafers in 1959 and has ever since led the innovations in the industry. SunEdison is a global leader among solar companies and is North America’s largest solar energy services provider. The company develops finances, operates and monitors solar plants across the globe.

SunEdison has also emerged as one of the largest solar companies in India having executed close to 250 MW of solar capacity in India and having built a significant pipeline of projects with cumulative capacity of 1000 MW for the next financial year. Along with utility scale projects, SunEdison is also very active in wind energy and distributed generation: Rooftop solar PV, Solar Pumping and Rural Electrification (micro-grid) domain.

We as a stakeholder are therefore submitting our suggestions and comments (enclosed and marked as Annexure- I) on the proposed framework Forecasting, Scheduling & Imbalance Handling for Renewable Energy (RE) Generating Stations based on wind and solar at Inter-State Level and would request the Hon'ble Commission to consider them for incorporation in the final Regulations.

Thanking You,

Faithfully Yours

Rakesh Shah

Director- Regulatory Affairs

Regards,

Rakesh Shah

Director (Regulatory Affairs)

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