

APL/CERC/31072019

31st July, 2019

Shri S. C. Shrivastava
Chief (Engineering)
Central Electricity Regulatory Commission
3rd & 4th Floor, Chanderlok Building
Janpath,
New Delhi- 110001

Subject: Constitution of Expert Group to review "Indian Electricity Grid Code and other related issues

Dear Sir,

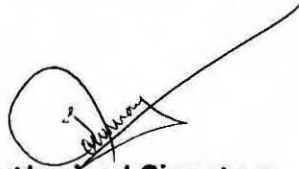
This is in continuation of our letter dated 24th July, 2019 vide which Adani Power Limited had submitted comments on the changes/modifications to be made in the existing IEGC in light of large scale integration renewable and changing power scenario in the country.

In this regard, please find enclosed additional comments with regards to Commissioning Procedure for Solar/Wind/Hybrid plants. You are kindly requested to take the comments on record.

Thanking You

Yours Sincerely,

For Adani Power Limited



Authorised Signatory

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**Recommendation for amendment in Grid Code with regards to Commissioning
Procedure for Solar/Wind/Hybrid plants**

1. All state in the India defines Commissioning/COD of RE project as below:
"Commissioning" with respect to the Project shall mean when all equipment's as per rated capacity has been installed and energy has flown into the grid.

"Commercial Operation Date" shall be the date certified by Committee/Agency upon successful commissioning of the full capacity of the Project or the last part capacity of the Project as the case may be.

Similar definition can be followed in the Grid Code for Renewable power

2. Reason for above definition
Solar/Wind/Hybrid power projects are dependent on the availability of natural resources i.e irradiation, wind etc. and suitable climatic condition for electricity generation. Unlike conventional power plants, Solar/Wind/Hybrid power plants are stabilised and capable of generating power from the date of synchronisation/commissioning. RE generators can't be subject to a performance test, given that their input is depended on nature, thus synchronisation should be sufficient condition for COD.
3. In view of above all the State DISCOMs currently follow below procedure with regards to synchronisation, commissioning and COD of the project:
- 30 days prior to the proposed synchronisation/commissioning/COD date developers are required to intimate the procurer.
 - Procurer as per state regulations forms committee comprising of competent authorities to declare and certify the plant as synchronised with grid, commissioned and commencement of commercial operation by the plant.
 - Prior to the date of Synchronisation, commissioning and COD, Developer ensures all the mandatory statutory approval like CEIG certificate, connectivity and charging approval etc. are in place.
 - On the date of synchronisation, commissioning & COD, commissioning committee and developer jointly sign the Installation report, Synchronisation & Commissioning MOM including initial meter reading for billing as per the terms of Power Purchase Agreement (PPA).
4. Renewable Energy is a must run plant and any delay in commissioning due to any process will only leads to non-utilisation of already set up RE resources apart from financial loss to the project. Any inspection or documentation requirement except as required for Safety should not cause RE plant to be left stranded. All inspection/documentation can follow subsequently and procurer may penalize the generator in case of non-compliance. Standard Bidding Guidelines and Bid documents shall be aligned with proposed amendments in the Grid code before implementation.