

GREENKO ENERGIES PRIVATE LIMITED

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Greenko/CERC/ Sharing/2019-01

Dated: 11th December, 2019

To

The Secretary,

Central Electricity Regulatory Commission

3rd & 4th Floor, Chandralok Building,

36, Janpath, New Delhi 110 001

Sub: Comments on Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) Regulations 2019

Respected Sir,

Please find enclosed herewith our comments/ suggestions on the draft CERC regulation 2019 on sharing of Inter State Transmission Charges for your kind considerations please. It is requested that our comments/ suggestions may kindly be considered in the final sharing regulations.

Thanking you

Yours Faithfully



Y K Sehgal

Executive Director

Greenko Group

Comments on sharing regulations:

Chapter 3 (Specific cases):

1. Refer Regulation 11 , 1 (c): Para (ii) Please refer MOP order dated 6th November, 2019 in which the date 31st March, 2022 have been extended till 31st December, 2022. Accordingly para 1(c) (ii) may be modified and read as commercial operation between 13.2.2018 and 31.12. 2022
2. In order to address variability and intermittency of standalone solar and wind generation projects, MNRE notified National wind – solar hybrid policy which includes development of hybrid generating stations of wind and solar generation with and without electric storage. CERC also in its seventh amendment of regulation on connectivity, LTA and MTOA has included Hybrid generation with storage as renewable generating station. Keeping above in view, since ISTS waiver is applicable to Solar and wind generation, this ISTS waiver shall be extended to hybrid generation of solar and wind with and without storage and also to solar with storage and wind with storage generation.
3. We have very large target of renewable generation in the country and for integration of such large renewable generation in Indian grid, the energy storage need to be developed and for the development of such energy storage system, there is need to formulate enabling regulations. Since these storage will be required for renewable generation mainly, it is proposed that ISTS waiver given to Renewable generation shall be extended to stand alone storage also.
4. The proposed ISTS waiver in the draft regulation is limited to those solar and wind generating stations where generation capacity has been awarded through competitive bidding guidelines issued by GOI and also PPA is signed for compliance of RPO obligations. This ISTS waiver applicability for such specific conditions will limit the development of RE as there are many other configurations for development of RE generation by different states. In line with the above RE as wind/ solar alone or hybrid with storage or without storage can be developed in following configurations:
 - a. Captive RE development across different states/ regions
 - b. Third party open access in which PPA are signed on bilateral negotiations and agreements

It is proposed that ISTS waiver shall be extended for such RE development and this will supplement the GOI efforts to meet RE target in the country.

5. Selling of RE power from DISCOM to DISCOM: At present there are many RE surplus states which have existing wind and solar generation and also have potential for future development. Similarly there are many RE deficit states which could not meet their RPO obligations and has large RE demand.

These DISCOMS both in RE surplus state and RE deficit state can be natural aggregator of supply and demand respectively. Therefore such RE surplus DISCOMS can provide RE power as round the clock power or schedulable power on demand to RE deficit DISCOMS. For encouraging such type of RE development in RE surplus states to RE deficit Discoms, it is proposed that ISTS waiver shall be extended to such RE development in the country.