



Reference: ARPPL – CERC – Connectivity Regulations-20200808

Date: 10th August 2020

To,
Shilpa Agarwal
Joint Chief (Engineering)
CERC, 3rd & 4th Floor, Chanderlok Building,
36, Janpath, New Delhi- 110001
Ph: 91-11-23353503
secy@cercind.gov.in
shilpa@cercind.gov.in

Subject: Comments on Draft Central Electricity Regulatory Commission (Grant of Connectivity) Regulations, 2020.

Respected Sir,

Greetings from Ayana Renewable Power Private Limited.

Ayana Renewable Power has been set up to develop significant megawatts (MWs) of renewable energy generation capacities in India. Presently, the company is developing 1100 MW of Utility scale solar projects in India.

The Draft Connectivity Regulations, 2020 is an important regulation which would facilitate the bidder to understand the connectivity procedures for the different bids that are being concluded through the Central bidding agencies

Looking forward to hear from you

Thanking You.

Yours Faithfully,
For Ayana Renewable Power Private Limited

Sharat Ranjan
DGM Business Development

Ayana Renewable Power Private Limited

Registered & Corporate Office:

3rd Floor, Sheraton Grand Hotel, Brigade Gateway Campus, 26/1, Dr. Rajkumar Road, Bangalore – 560055, Karnataka.

CIN: U40106KA2017PTC101000

Tel: +91 080-48511001 email: contact@ayanapower.com website: www.ayanapower.com



Appendix 1 – Suggested Comments on Draft Power Market Regulations

Sl. No.	Clause No. /Page No.	Existing Clause	Suggested Amendments / Clarifications Sought												
1	5.2, Page 4	<p>Utilisation of Connectivity granted to the Parent Company by its Subsidiary company (ies) and Transfer of Connectivity.</p> <p>The utilisation and transfer of Connectivity shall be governed in accordance with Clause 8A of the Connectivity Regulations.</p> <p>100% subsidiary companies shall be allowed to transfer their connectivity and LTA to the parent company and vice versa one year after achieving commercial operation of Renewable Energy generating station(s)</p>	<p>It is understood that the Transfer of connectivity between the Parent and its 100% subsidiary is possible only after completion of one year from COD of the project.</p> <p>We request the hon'ble commission to</p> <ul style="list-style-type: none"> Relax the clause on transfer of connectivity post one year from COD of the project to COD of the project. Dilute the 100% shareholding requirement of subsidiary to 51% requirement to bring it in line with the Standard Bid Documents where the Majority shareholder is required to keep at least 51% equity of the project post one year COD of the project. 												
2	7.7, Page 7	<p>Unless otherwise specified at the time of grant of Stage-I Connectivity, the power carrying capacity of the Dedicated Transmission Line shall be as below:</p> <table border="1"> <thead> <tr> <th>SN</th> <th>Voltage Level</th> <th>Minimum Capacity of the Dedicated Transmission Line (per circuit)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>132 KV</td> <td>80 MW</td> </tr> <tr> <td>2</td> <td>220/230 KV</td> <td>300 MW</td> </tr> <tr> <td>3</td> <td>400 KV</td> <td>900 MW</td> </tr> </tbody> </table>	SN	Voltage Level	Minimum Capacity of the Dedicated Transmission Line (per circuit)	1	132 KV	80 MW	2	220/230 KV	300 MW	3	400 KV	900 MW	<ul style="list-style-type: none"> Clarification is sought if the minimum size for connectivity application for 220 KV line has to be 300 MW or can be lesser than this capacity for the application. Will the application be declined if the capacity of less than 300 MW is won in the bid and the application is made under 220 KV?
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1	132 KV	80 MW													
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3	9.2, Page 8	<p>Eligibility for Stage-II Connectivity</p> <p>(b) An entity implementing the Renewable Hybrid Generating Station(s) including Round the Clock Hybrid Project, shall be eligible to apply for separate Stage-II Connectivity for each location based on the same LOA or PPA, for the capacity of the project not exceeding the quantum of power for which LOA has been awarded or PPA has been signed. For this purpose, the locations and capacity at each such location, duly certified by the Renewable Energy Implementing Agency or the distribution licensee shall be submitted along with the Connectivity applications.</p>	<p>As per our interpretation with the illustration of the example, it is evident that the co-location project will get the same capacity as mentioned in the LoA where as the project located at different locations would be eligible to get connectivity of LoA capacity at each of these location. Kindly clarify?</p> <table border="1"> <thead> <tr> <th>LoA awarded</th> <th>State A</th> <th>State B</th> <th>Connectivity Application</th> </tr> </thead> <tbody> <tr> <td>500 MW</td> <td>500 MW Wind 500 MW Solar 200 MW Storage</td> <td>--</td> <td>500 MW</td> </tr> <tr> <td>500 MW</td> <td>500 MW Wind</td> <td>700 MW Solar</td> <td>500 MW in State A 500 MW in State B</td> </tr> </tbody> </table>	LoA awarded	State A	State B	Connectivity Application	500 MW	500 MW Wind 500 MW Solar 200 MW Storage	--	500 MW	500 MW	500 MW Wind	700 MW Solar	500 MW in State A 500 MW in State B
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