

**APP Comments on Draft Amendment to Detailed Procedure for  
“Grant of Connectivity to Projects Based on Renewable Sources to Inter-State Transmission System”**

Sr. No.	Clause	Proposed Amendment	APP Comments
1.	<b>9.2.1</b>	An entity which has been issued the Letter of Award by, or has entered into a Power Purchase Agreement (PPA) with, a Renewable Energy Implementing Agency or a distribution licensee consequent to tariff based competitive bidding, on submission of such Letter of Award or PPA, as the case may be:	<p>Ministry of Power (MoP) vide their order dated 5<sup>th</sup> August 2020 has waived off ISTS Transmission Charges and Losses for power plants for period of 25 years using solar and wind sources of energy including solar-wind hybrid power plants for sale of power to entities having RPO provided such projects are commissioned till 30<sup>th</sup> June 2023.</p> <p>The above para of the order was specifically incorporated to extend grant of waiver of ISTS Transmission Charges and Losses to captive power plants and other open access users having RPO. It is suggested to align the eligibility criteria for grant of Stage II connectivity with the above order of MoP so that such obligated entities are also eligible to apply for stage II by submitting Letter of Award/ Power Purchase Agreement for sale of power from their ISTS connected renewable generation project to entities having RPO in the country.</p> <p>It is suggested to modify the proposed amendment as under:</p> <p>“An entity which has been issued the Letter of Award or has entered into a Power Purchase Agreement (PPA) with a Renewable Energy Implementing Agency or a distribution licensee consequent to tariff based competitive bidding or with entities having RPO for sale of power from ISTS connected renewable generation project, on submission of such Letter of Award or PPA, as the case may be:”</p>

<p>2.</p>	<p><b>9.2.1</b></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, as the case may be, shall be submitted along with the Connectivity applications.</p>	<p>For supplying RTC power from Hybrid Renewable Projects, typically the installed capacity of such renewable projects are approximately 3 - 4 times the contracted capacity under the PPA.</p> <p>The SECI PPAs also permit sale of excess energy generated from such Hybrid Project either to SECI / Discoms at per PPA tariff (under First Right of Refusal) or in open market. Thus, to facilitate above it is suggested that the connectivity should be granted for full installed capacity for the Hybrid RE Projects.</p>
<p>3.</p>	<p><b>7.3</b></p>	<p>-</p>	<p>It is submitted that often Project Developers are forced to shift the Project locations to other nearby locations citing challenges associated with land acquisition. Under such conditions Applicants should be allowed to retain the existing Connectivity as long as it is committed to maintain connectivity with originally proposed substation for which Connectivity has been granted.</p> <p>In view of above following may also be added in the said clause</p> <p>“Provided further if the Applicant changes the location of the Project but maintains connectivity with substation where Stage – I / Stage - II Connectivity has been granted, the same Connectivity can be continued without any need of making fresh Application for Connectivity”</p>