

EDEN RENEWABLE CITE PRIVATE LIMITED
CIN: U36100DL2017PTC321762

August 14, 2020

Reference No. ERCPL/CERC/BD-142

To,

**Hon'ble Secretary,
Central Electricity Regulatory Commission,
New Delhi-110001**

Sub: Comments on Draft Amendment to Detailed Procedure for "Grant of Connectivity to Projects Based on Renewable Sources to Inter-State Transmission System"

Reference: Public Notice No. L-1/(3)/2009-CERC Dated: 24.07.2020

Dear Sir,

With reference to above subject we wish to submit that this is a very novel action on the part of the Hon'ble Commission to bring more clarity in the provisions of existing procedure. This will definitely help to cover the various situations, which have evolved in last few years and which were not considered in the existing procedure.

We wish to submit the below comments on the Draft:

1. Clause 5.1 should be replaced with the below provisions, as the cases under Sr. No 1 to 6 have lost relevance in the current scenario and are not applicable:
Revised Suggested Modified Clause 5.1 is as per below:

5.1. An entity or company who has been granted Stage-1 or Stage-1 & Stage-2 Connectivity or Stage-1 & Stage-2 Connectivity and LTA prior to issue of this Procedure for setting up project(s) / park based on renewable energy sources shall be treated as under after notification of this Procedure:

Sl. No.	Present Status	Status upon notification of this Procedure	
1	Applicants whose cases have been decided for grant of Connectivity in the meeting of the constituents and intimation thereof has not been issued	Intimation shall be issued for grant of Stage-I Connectivity within one week of issue of this Procedure with	
2	All the other pending applications for grant of Connectivity.	Application shall be processed as per provisions of this amended procedure. Applicant shall be informed of the required document, if any, within 7 days of issue of this procedure and shall be required to submit the same within 15 days.	
3	Applicant who has been granted Connectivity and LTA	shall be informed of the required document and submission timelines, if any, within 7 days of issue of this procedure.	

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2. Clause 5.3.1 may be amended as per below:

5.3.1 For the connectivity system, the dedicated transmission line including line bay(s) at generation pooling station shall be under the scope of the applicant and the ~~terminal associated~~ bay(s), including complete system for Data Connectivity (Plug & Play System) at the ISTS sub-station shall be under the scope of transmission licensee owning the ISTS sub-station subject to compliance of relevant provision of tariff policy.

Provided that the applicant, at its own discretion, may itself construct the associated bay(s), subject to approval of the CTU and agreement with the transmission licensee owning the ISTS sub-station. Applicant will be free to get the project supervised from Transmission. Transmission Licensee shall charge INR 25 lakhs or 5% of the Bay construction Cost, whichever is less, as supervision charges for the purpose.

3. *We request the addition of below language for clause 6.3*

6.3 The applications complete in all respects, received online shall have a time and date stamp. This date and time stamp shall also be displayed against the application on website of CTU. Further, such applications received by 2400 hrs. of the last day of the month shall be deemed to have been received during the month and shall be processed after the end of the month except as specifically provided otherwise at Clause 6.5 of this Procedure.

4. We request the below modified provision 9.3.1

9.3.1 After grant of Stage II connectivity, the grantee covered under Clause 9.2.1 shall have to submit information on timelines as per the Power Purchase Agreement for below milestones alongwith copy of PPA within 1 month of approval of same by Appropriate Commission. Further Grantees shall submit a letter from REIA or Discom confirming fulfilment of these conditions in time or extension thereof within 10 days of timelines:

- (i) Ownership or lease rights or land use rights of the land
- (ii) Financial closure
- (iii) ~~Proof of release of funds duly supported by Auditor's certificate regarding release of such funds through equity...~~

5. Suggested amendment to Clause 10.8

iv. Intimation of Grant of Connectivity should also mention the planned date of construction of Substation/Bay. In case same has not been provisioned in the current construction plan, the date should be intimated immediately on award of the TBCB successful Bidder/RTM awardee.

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6. Suggested amendment to Clause 10.9

10.9 The Stage-II Connectivity Grantee shall sign the Transmission Agreement for Connectivity and submit the Connectivity Bank Guarantee (Conn-BG1 and Conn-BG2) (as prescribed below) or Demand Drafts of equal amount replaceable in future by Connectivity Bank Guarantee -to CTU within ~~30-45~~ days of issue of intimation. No extension of time shall be granted and in case of failure to sign the Agreement and / or to furnish the requisite bank guarantee, Stage-II Connectivity shall be cancelled under intimation to the grantee.

Yours Truly,
For **Eden Renewable Cite Private Limited.**



Vivek Kodesia
(Authorised Signatory)