INDIAN WIND POWER ASSOCIATION



(Northern Region Council)

Date 16.08.2020

To,

The Secretary
Central Electricity Regulatory Commission
3rd& 4th Floor, Chandralok Building, 36, Janpath, New Delhi -110 001

Subject: Indian Wind Power Association (IWPA-NRC) submission in the matter of CERC Draft Amendment to Detailed Procedure for "Grant of Connectivity to Projects Based on Renewable Sources to Inter-State Transmission System".

Dear Sir,

At the outset, we extend our gratitude to this Hon'ble Commission for inviting the stakeholder's comments/objections in the matter of CERC Draft Amendment to Detailed Procedure for "Grant of Connectivity to Projects Based on Renewable Sources to Inter-State Transmission System".

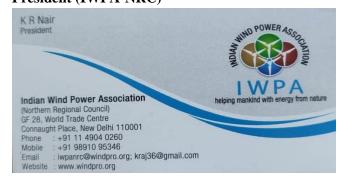
We would like to introduce ourselves as the Indian Wind Power Association (IWPA), an Association of wind power developers and investor of India and was set up in 1996 as a non-profit organization under the Tamil Nadu Societies Registration Act, 1975. Started with 37 members, the Association is now having 1100 members spread all over India.

The Association is working closely with several national industry bodies such as the Indian Renewable Energy Development Agency, Ministry of New and Renewable Energy, Ministry of Power, Ministry of Environment, Confederation of Indian Industry, State Utilities, State Electricity Regulatory Commissions etc.

IWPA- NRC hereby encloses its comments/objections in the matter of CERC Draft Amendment to Detailed Procedure for "Grant of Connectivity to Projects Based on Renewable Sources to Inter-State Transmission System". We request this Hon'ble Commission to allow us to represent/submit some additional submission at the time of public hearing.

Thanking You,

K.R Nair President (IWPA-NRC)



S. No.	Clause No.	Proposed Amendment	IWPA- NRC Suggestions/Comments
1	9.2.1 b	Illustration (b) provided under this clause: b) Suppose a bidder is awarded LOA for 500 MW under Round the Clock Hybrid Scheme with projects at multiple locations - 500 MW (Solar) in State "A" and 700 MW (Wind) in State "B". Such project shall be eligible for Stage-II Connectivity under Clause 9.2.1, for the capacity of the project not exceeding the quantum of LOA (500 MW in the instant case) at each location on the basis of same LOA. If the said project intends to sell surplus power over and above the quantum for which Stage-II Connectivity has been granted under Clause 9.2.1, it shall be required to apply for additional Connectivity under Clause 9.2.2.	It is essential to match the timelines provided under the bidding documents with the timelines provided in this procedure. It is relevant to note that under the RTC route the project can be distributed in more than two states/RLDCs and therefore may have to match two entirely different ISTS commissioning timelines with the timelines provided in the RTC bidding documents. Noncompliance to any of the timelines may derail the entire project. In view of the above we request Hon'ble Commission to provide flexibility to the grantees in such situation.
2	9.3.4	CTU shall monitor the status of projects on monthly basis covered under Clause 9.3.1 and 9.3.2 and take appropriate action timely.	IWPA welcomes this Hon'ble Commission's decision of assigning CTU with the role and responsibility of monitoring the project status. Along with it this Hon'ble Commission has also provided CTU the role of taking appropriate action in these matters. But we would humbly like to point out that the clause 9.3.4 seems to be vague as it does not specify the appropriate actions. We request the Hon'ble Commission to provide more clarity by defining the role of CTU along with the kind of timely action the Commission envisages for it in matters where the project is being delayed. As per our understanding of Clause 9.3.4, CTU is accorded the power of taking action if it foresees a project being delayed. Hence for the situations where the projects are delayed due to issues beyond the

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					this Hon'ble Commission to lay down procedures so that the CTU can entertain these issues also and take appropriate actions.	
3	10.10 A	132 kV Rs La 220/230 R kV La 400 kV Rs	s detaile conn- GG1		Additional Conn- BG2for each additional bay Rs 3 Cr Rs. 3 Cr	It has been observed that the tabl provided earlier in 10.10 A was base on MW capacity. However as per th revised draft procedure, the allocation is based on voltage leven. Now relying on the tabulation provided under clause 7.7, which deals with the capacity of dedicate transmission lines, the voltage leven have been linked to the minimur capacity. A clarity is required that a a particular voltage, how much MV capacity will be allocated to the respective applicants. Further, the amount of BG also seems to be inconsistent. For a instance earlier upto 80 MV capacity, the amount was Rs 1 Control of the revise provided in 10.10 A of the revise procedure. This corresponds to 3. times increase in the BG rate Similarly the BG rates for 220/230 k level has been reduced by 30%; For 400kV the amount has increase by 30%. Therefore, we request the Hon'bl Commission to rationalize the BC.
						rates and provide clarity on the capacity to be allocated on the basis of various voltage levels
4	10.10 B	In case Stage- accordance with this Procedure, encashed.	h Clause	9.3.3 or C	The Hon'ble Commission has hereby provided the condition where the Connectivity is revoked but still the Bank guarantee of the grantee is not encashed. We humbly would like to bring to the	
						notice of the Hon'ble Commission

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			that there have been some events due to which the timelines could not be adhered to by the grantees.
			For instance, the change in the state policies pertaining to allocation of land, non-execution of the PPAs/PSAs, etc. Such events are beyond the control of the Stage - II grantees. In such cases also, the BG should not be encashed.
			We request you to make the corresponding changes in the final procedure

We would be thankful if this Hon'ble Commission considers our suggestion while finalizing the detailed procedure for "Grant of Connectivity to projects based on Renewable sources to Inter-State Transmission System".