



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)



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S. No.	Clause No.	Proposed Amendment	IWPA- NRC Suggestions/Comments
1	9.2.1 b	<p>Illustration (b) provided under this clause:</p> <p>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.</p>	<p>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. Non-compliance to any of the timelines may derail the entire project.</p> <p>In view of the above we request Hon'ble Commission to provide flexibility to the grantees in such situation.</p>
2	9.3.4	<p>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.</p>	<p>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.</p> <p>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.</p> <p>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 control of the grantee, we request</p>

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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	<p>Conn-BG1 and Conn-BG2 shall be furnished by the applicants as detailed below:</p> <table border="1" data-bbox="360 801 954 1464"> <thead> <tr> <th data-bbox="360 801 515 1070">Bay allocated</th> <th data-bbox="515 801 647 1070">Conn-BG1</th> <th data-bbox="647 801 786 1070">Conn BG2</th> <th data-bbox="786 801 954 1070">Additional Conn-BG2 for each additional bay</th> </tr> </thead> <tbody> <tr> <td data-bbox="360 1070 515 1173">132 kV</td> <td data-bbox="515 1070 647 1173">Rs 50 Lakh</td> <td data-bbox="647 1070 786 1173">Rs 3 Cr</td> <td data-bbox="786 1070 954 1173">Rs 3 Cr</td> </tr> <tr> <td data-bbox="360 1173 515 1323">220/230 kV</td> <td data-bbox="515 1173 647 1323">Rs. 50 Lakh</td> <td data-bbox="647 1173 786 1323">Rs.3 Cr</td> <td data-bbox="786 1173 954 1323">Rs. 3 Cr</td> </tr> <tr> <td data-bbox="360 1323 515 1464">400 kV</td> <td data-bbox="515 1323 647 1464">Rs. 50 Lakh</td> <td data-bbox="647 1323 786 1464">Rs.6 Cr</td> <td data-bbox="786 1323 954 1464">Rs. 6 Cr</td> </tr> </tbody> </table>	Bay allocated	Conn-BG1	Conn BG2	Additional Conn-BG2 for each additional bay	132 kV	Rs 50 Lakh	Rs 3 Cr	Rs 3 Cr	220/230 kV	Rs. 50 Lakh	Rs.3 Cr	Rs. 3 Cr	400 kV	Rs. 50 Lakh	Rs.6 Cr	Rs. 6 Cr	<p>It has been observed that the table provided earlier in 10.10 A was based on MW capacity. However as per the revised draft procedure, the allocation is based on voltage level. Now relying on the tabulation provided under clause 7.7, which deals with the capacity of dedicated transmission lines, the voltage levels have been linked to the minimum capacity. A clarity is required that at a particular voltage, how much MW capacity will be allocated to the respective applicants.</p> <p>Further, the amount of BG also seems to be inconsistent. For an instance earlier upto 80 MW capacity, the amount was Rs 1 Cr. The same would fall at 132 kV level provided in 10.10 A of the revised procedure. This corresponds to 3.5 times increase in the BG rate. Similarly the BG rates for 220/230 kV level has been reduced by 30%; For 400kV the amount has increased by 30%.</p> <p>Therefore, we request the Hon'ble Commission to rationalize the BG rates and provide clarity on the capacity to be allocated on the basis of various voltage levels</p>
Bay allocated	Conn-BG1	Conn BG2	Additional Conn-BG2 for each additional bay																
132 kV	Rs 50 Lakh	Rs 3 Cr	Rs 3 Cr																
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4	10.10 B	In case Stage-II Connectivity is revoked in accordance with Clause 9.3.3 or Clause 11.2 of this Procedure, Conn-BG1 and Conn-BG2 shall be encashed.	<p>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.</p> <p>We humbly would like to bring to the notice of the Hon'ble Commission</p>																

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			<p>that there have been some events due to which the timelines could not be adhered to by the grantees.</p> <p>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.</p> <p>We request you to make the corresponding changes in the final procedure</p>

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”**.