

*Ravinder*

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4 August 2020

COMMENTS DETAILED PROCEDURE FOR “GRANT OF CONNECTIVITY TO PROJECTS  
BASED ON RENEWABLE SOURCES TO INTER-STATE TRANSMISSION SYSTEM”

Dear Sir/Madam

Please refer No. L-1/(3)/2009-CERC Dated: 24.07.2020 publishing the above draft procedure for comments/suggestions.

I welcome the refinements proposed by the commission. It is now simplified and better aligned with situation

However, I seek your indulgence on few important issues.

1. *“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:*

*Provided that,*

*(a) Such entity is a grantee of Stage-I connectivity or has applied for Stage-I Connectivity or has applied for Stage-I Connectivity and Stage-II Connectivity simultaneously.*

*(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**<sup>1</sup> 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”.*

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<sup>1</sup> POINT 1

POINT 1: 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.

I have two objections as follows:

- Hybridization of energy takes place when individual solar/wind/storage/etc. projects are packed in one location and they inject power through a common dedicated line, in my view. If two disparate RE plants are considered a hybrid facility the transmission will not be optimized and it will not be appropriate.
- The sum of installed capacities of constituents of RE plants is likely to be greater than the contracted PPA capacity in order to take care of dips in the output of one or both constituents' output. If the connectivity is capped at PPA capacity, the developer will not be able to sell interim surplus power in DAM or PTM or ancillary service. However, the question is how much in excess of PPA capacity?

Best regards

A handwritten signature in blue ink, appearing to read 'Ravinder', with a stylized, cursive script.

(RAVINDER)