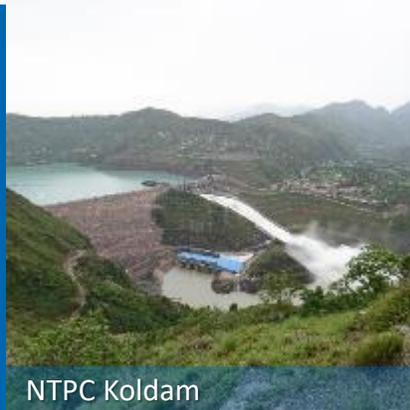


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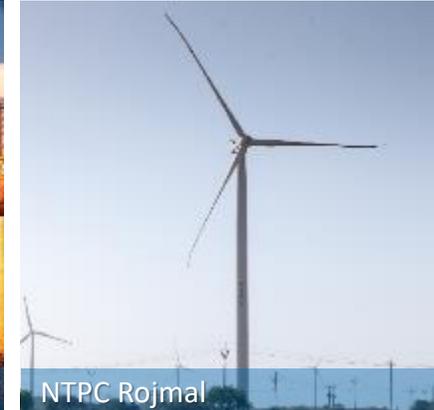
# NTPC submission on Draft Connectivity and General Network Access to the ISTS (Fourth Amendment) Regulations, 2025



NTPC Koldam



NTPC Kayamkulam



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# Conversion of in principle or final grant of Connectivity to restricted access

- Regulation 5.11(b) of the Draft provides for 3 months' time to REGS/RHGS (with or without ESS) to apply for additional capacity, failing which non solar connectivity shall be restricted.

## Submission:

- Existing solar developers are required to make power sale arrangements by participation in BESS or solar plus storage tenders.
- Only after ensuring power sale arrangements, existing solar developers may apply for additional capacity.
- Therefore, the proposed 3 months period is very less for making all such arrangements before applying for additional capacity.

**REGS/RHGS may be provided at least 12 months for applying for additional capacity within the quantum of granted Connectivity.**

## Additional Connectivity for ESS with restricted access to be established by a Thermal Station

- As per proposed amendment, **only an REGS (with or without ESS) based on Wind source or ESS** may seek Connectivity with restricted access during non-solar hours. [ draft Regulation 5.11 (a)]

### Submission:

- A thermal station may also intend to establish an ESS, for optimum utilization of URS during solar hours.
- In case of co-located ESS with a thermal station, the additional connectivity may require construction of new transmission infrastructure. However, the same ESS may be established at a location where non-solar connectivity is available.
- This will obviate the requirement of constructing new transmission infrastructure.
- Therefore, under Regulation 5.11 (a) a thermal station willing to establish ESS as part of the station may also be made eligible for applying the **additional connectivity**.

***“5.11 (ai) thermal generating station with a non co-located ESS may seek additional connectivity for ESS with restricted access”.***

## Scheduled date of commercial operation (SCoD) for additional capacity within the quantum of granted Connectivity

- A generating station or ESS is eligible to add **additional generation capacity, within the quantum of Connectivity granted** to it.
- The Regulation **5.2(a)(c) and 5.2(a)(e)** of the Draft Regulations provide that:

*In case of **REGS (with or without ESS) or ESS** the SCoD for the additional capacity **shall not be later than 18 months** from date of effectiveness of these amendments or date of approval by the Nodal Agency, whichever is later.*

### Submission:

- Since power sale arrangement is to be made for such additional capacity & commissioning schedule is as per the RfS/PPA for TBCB projects in line with TBCB Guidelines.
- Generally, TBCB based REGS projects have 24 months period to achieve SCoD.
- Therefore, The time period of 18 months for achieving SCoD may please be reviewed for such projects.

**SCoD of additional capacity may be linked with actual commissioning timelines of the project as per RfS/PPA.**

## Furnishing SCOD of the generating station under the Park prior to grant of final connectivity

- As per the draft amendment proposes to insert 5.8 (vii) (d) as below:

*The Renewable Power Park Developer shall furnish the scheduled date of commercial operation of the generating station under the Park prior to grant of final connectivity.*

### Submission:

- A Solar power park developer (SPPD) is required to complete the development of solar park within the stipulated timelines of MNRE and accordingly, the connectivity is sought by the SPPD.
- The Solar Projects are allotted at later stage and SCoD dates of individual projects may not be available at the time of applying connectivity by SPPD.
- Further timeline for the individual projects implemented under solar park will depends upon timelines as per their respective agreements and in case of delay in CoD of projects there is already provision of penalty.

**In the view of above, it is requested to delete 5.8 (vii) (d) .**

## Additional comment: Difficulty in determining the connectivity quantum for applicants with dual connectivity to ISTS and Intra State Transmission system.

- Thermal generators seeking dual connectivity are required to first apply connectivity to intra-state system and then to ISTS for balance quantum.
- However, the following issues are faced by the generators in deciding the STU connectivity quantum:
  - In case of CGS, the allocation of power is done by MoP and allocation to the home state is not available during the award stage of project when connectivity is typically applied.
  - Any quantum selected by the generator at application stage may change based on the final allocation.

**Submission:** A proviso may be added after Regulation 5.1 of the principal Regulations as below:

*“5.1 Provided that if such an Applicant already has Connectivity to intra- State transmission system for part of its installed capacity, it may apply for Connectivity to the ISTS for a quantum not exceeding the balance of the installed capacity; However, for such cases CTU shall coordinate with the STU to which connectivity has been applied for finalization of unified connectivity arrangement.*

*Further, in such cases, Connectivity to intra-state system shall be limited to the allocation made to the state and balance STU connectivity shall be considered as ISTS Connectivity.*

## Additional comment:

### Cost sharing of Reactive Power Compensation Equipment (RPCE)

- Existing connectivity grantee may have installed or may be in process of installing RPCE.
- New connectivity grantee will also get support of RPCE in terms of voltage regulation.
- ***It is requested to clarify the mechanism for sharing of such cost.***

**Thanks**