



Manish K. Singh
Secretary

No. InWEA/62/2015-16

1st May, 2015

To

The Secretary,
Central Electricity Regulatory Commission,
3rd & 4th Floor, Chanderlok Building,
36, Janpath, New Delhi-110001.

Subject: Comments on "Draft Central Electricity Regulatory Commission (Grant of Connectivity, Long-term Access and Medium-term Open Access in inter-State Transmission and related matters) (Fourth Amendment) Regulations, 2015"

and

"Draft Central Electricity Regulatory Commission (Grant of Regulatory Approval for execution of inter-State Transmission Scheme to Central Transmission Utility) (First Amendment) Regulations, 2015"

Ref: Public Notice No.L-1(3)/2009-CERC & L-1/41/2010-CERC

Dear Sir,

This is with reference to the public notice inviting objections/comments on the above mentioned Regulations.

Indian Wind Energy Association (InWEA) is an association registered at New Delhi to represent the interest of various stakeholders in wind energy sector across various states in India. We are pleased to submit our objections/comments/suggestions on proposed framework for kind perusal of the Hon'ble Commission. Our comments to the said publication are summarised in **Annexure I** enclosed herewith.

I, Manish K Singh, am duly authorised by Indian Wind Energy Association to file these comments/suggestions on its behalf. InWEA further requests the Hon'ble Commission to grant an opportunity to present its case in person before the Hon'ble Commission during the hearing on the above matter.

Thanking you,

Yours truly,

(Manish K. Singh)

Encl: Annexure-1: InWEA Comments on proposed amendments

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Annexure-I
Comments on Proposed Amendments on "Draft Central Electricity Regulatory Commission (Grant of Connectivity, Long-term Access and Medium-term Open Access in inter-State Transmission and related matters) (Fourth Amendment) Regulations, 2015"

"Draft Central Electricity Regulatory Commission (Grant of Regulatory Approval for execution of inter-State Transmission Scheme to Central Transmission Utility) (First Amendment) Regulations, 2015"

Comments on Draft Central Electricity Regulatory Commission (Grant of Connectivity, Long-term Access and Medium-term Open Access in inter-State Transmission and related matters) (Fourth Amendment) Regulations, 2015

Regulation No.	Proposed Amendment to Regulation	InWEA Comments/ Objections / Suggestions
Regulation 2 Clause 1(b) (i) (e)	<p>Regulation 2: Definitions Sub clause (f) shall be added: "(f) Any company designated by the Central Government as Solar Power Park Developer, "</p>	<ul style="list-style-type: none"> The proposed amendments pave way for recognition of solar park developer, which is not a generator but a project developer. The solar developer develops the project by procuring land, obtaining necessary permissions etc. And the generator would come at a later stage when the infrastructure is developed. The development of wind projects is also similar wherein the wind project developer undertakes wind resource assessment, procures land, develops road infrastructure, obtains all permissions. The actual generators comes in at a later stage like the solar park. At present the provisions of Grant of Connectivity, Long-term Access and Medium-term Open Access in inter-State Transmission and related matters (Amendment) Regulations, 2010 has a provision that for a lead generator form the group of renewable generators with aggregate capacity of more than 50MW can apply for connectivity. <p>However as explained above the generator comes in at a later stage and the intervention by Hon'ble Commission is a welcome step for recognising the solar project developer to be eligible to apply for connectivity.</p>



Regulation No.	Proposed Amendment to Regulation	InWEA Comments/ Objections / Suggestions
Regulation 2 Clause 1 (ii)	<p>Regulation 2: Definitions Sub clause (iii) shall be added: “(iii) Any company designated by the Central Government as Solar Power Park Developer, in respect of long term access, “</p>	<ul style="list-style-type: none"> It is suggested that the amendment should recognize both Solar & Wind Project Developers as eligible for applying for connectivity. Such amendment would be helpful in streamlining the implementation Solar/Wind Projects and development of such wind/solar projects at a much faster pace. It is suggested that the amendment should recognize both Solar & Wind Project Developer as eligible for applying for long term access
Regulation 8 Clause 1	<p>Regulation 8: Grant of Connectivity “Provided also that the application by the applicant defined under Regulation 2(1) (b)(i) (f) shall be considered by CTU only if the Solar Power Park Developer is authorized by the Central Government to undertake infrastructural activities including arrangement for connectivity on behalf of the solar power generators and all operational and commercial responsibilities for the renewable energy generating station(s) in following the provisions of the Indian Electricity Grid Code and all other regulations of the</p>	<ul style="list-style-type: none"> It is suggested that the amendment should recognize both Solar & Wind Park Developer, which would be responsible to undertake all operational & commercial responsibilities of solar/wind power generators. As in case of wind project developer there is no process if authorisation, it is thus suggested that the CTU shall consider the application by wind project developer after submit document to the effect that it would undertake infrastructural activities including arrangement for connectivity on behalf of the solar power generators and all operational and commercial responsibilities for the renewable energy generating station(s) in following the provisions of the Indian Electricity Grid Code and all other regulations of the Commission, such as grid security, scheduling and dispatch, collection and payment/adjustment of Transmission charges and losses, UI charges, congestion and other charges etc., As the wind or solar project developer may not be involved in



Regulation No.	Proposed Amendment to Regulation	InWEA Comments/ Objections / Suggestions
	<p>Commission, such as grid security, scheduling and dispatch, collection and payment/adjustment of Transmission charges and losses, UI charges, congestion and other charges etc., and submit the documents to that effect to the CTU, along with the application for connectivity, with copy to the respective RLDC in whose control area it is located."</p>	<p>operation of the project after completion of the project, the responsibilities to undertake infrastructural activities including arrangement for connectivity on behalf of the solar power generators and all operational and commercial responsibilities for the renewable energy generating station(s) in following the provisions of the Indian Electricity Grid Code and all other regulations of the Commission, such as grid security, scheduling and dispatch, collection and payment/adjustment of Transmission charges and losses, UI charges, congestion and other charges etc., may be transferred to the lead generator or to the generators upon completion of the project.</p>



Comments on “Draft Central Electricity Regulatory Commission (Grant of Regulatory Approval for execution of inter-State Transmission Scheme to Central Electricity Regulatory Commission) (First Amendment) Regulations, 2015”

Regulation No.	Proposed Amendment to Regulation	InWEA Comments/ Objections / Suggestions
Regulation 3 Clause 1 (ii)	<p>Regulation 3: Scope and Applicability</p> <p>Sub clause (iii) shall be added: “(iii) ISTS Scheme proposed by CTU, for which the Central Government designated Solar Power Park Developer has sought long term access, and for which consultation with CEA and beneficiaries wherever identified has been held for setting up the ISTS scheme and the Solar Power Park Developer undertakes to bear all liabilities on behalf of the Solar Project Developers to be set up in the Solar Park.”</p>	<ul style="list-style-type: none"> • In order to achieve an ambitious target of 160 GW for wind & solar, if the proposed amendment also includes wind project developer, would encourage both solar & wind project developers and investors to put up more projects of similar nature. • It is thus suggested that the amendment should recognize both Solar Park Developer as well as & Wind Project Developer for execution of inter-state transmission scheme.