



एन टी पी सी लिमिटेड

(भारत सरकार का उद्यम)

NTPC Limited

(A Govt. of India Enterprise)

केन्द्रीय कार्यालय/Corporate Centre

Ref: 01: CD: 717:

Dated: 08-05-2015

To

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

Sub: Comments on Draft Fourth Amendment to Connectivity Regulations, 2015.

Dear Madam

NTPC has filed its submission in regard to above mentioned draft Regulations to Hon'ble Commission vide our letter dated 30.04.2015. Further, the attached additional submissions may also be considered while finalizing the amendments.

Thanking You

Yours faithfully

(Rajnish Bhagat)
GM (Commercial)

Encl: Additional submissions on Draft Amendments Regulations (2 pages)

Additional submissions post Public Hearing dated 5/05/2015 on following Regulations

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.

NTPC has filed its submission in regard to above mentioned draft Regulations to Hon'ble Commission vide our letter dated 30.04.2015. Further the following additional submissions may also be considered while finalizing the amendments.

- 1) As per CERC (Terms and Conditions for Tariff determination from Renewable Energy Sources) Regulations, 2012, energy metering for the purpose of billing is to be done at inter-connection point which has been defined as line isolator on outgoing feeder on HV side of Solar Power Generator (1st) pooling Sub-station. All costs up to inter-connection point have been factored in while determining the generic tariff by Hon'ble Commission. Any other cost beyond inter-connection point such as O&M cost of SPPD's pooling sub-station, servicing of expenditure towards other infrastructure work (Connectivity/LTA expenses, Scheduling, dispatch expenses etc.) incurred by Solar Power Park Developer (SPPD), would need to be pass through in tariff as has been allowed by Hon'ble Commission for the RLDC charges for Conventional (Thermal, Hydro) Generation. Otherwise generic tariff would need to be re—determined after incorporating the expenses to be paid by Solar Generators to Solar park developer. In the alternative, the SPPD would need to enter into separate agreements with beneficiaries for recovery of his charges. It is further suggested that since the charges of SPPD would be mainly on account of intervening transmission system developed by it, the charges of SPPD may be recovered through PoC Mechanism by escalating the transmission charges proportionally and paid back to SPPD by CTU.

In case any changes in the definition of inter-connection point is envisaged, the same may be made applicable prospectively for the new projects envisaged after cut-off date.

In regard to estimation of the cost likely to be incurred by SPPD, it is submitted that SPPD for Anantapur Solar Park being developed in Andhra Pradesh, the SPPD Andhra Pradesh Solar Power Corporation Limited (ASPCL) is charging Rs. 20 lakh /MW for 250MW (Phase-I) Solar plant capacity towards land acquisition, internal transmission system, Cable trenches for 33kV cables, Common roads/bridges, water supply lines, and street lights along with common roads. These charges have been factored in the tariff negotiated by NTPC with AP Discoms up to inter-connection point. The estimated O&M charges would be approximately Rs. 60,000/MW/annum towards maintenance of assets of SPPD. This estimation is based on DPR of **Bhadla Solar Park Phase-II** in Rajasthan. These charges to be designated as Solar Charges beyond inter-connection point and need to be pass through to Solar Generators from beneficiaries.

- 2) In presently envisaged schemes, since the pooling sub-station would be owned by SPPD, the Hon'ble Commission would need to set the Standard of Performance in line with performance parameters set for a Transmission licensee. The solar generators need to be compensated in the form of deemed generation for non-availability of their system i.e. pooling substation and associated transmission lines at least to the tune of CUF level.
- 3) In case of mismatch in commissioning of Generating Station vis-a- vis transmission system, it is submitted that any provision regarding bearing of transmission charges of transmission licensee /Annual fixed cost of the generator should be equitable to both the parties. In case generation project using ISTS network is delayed in commissioning, and made liable to pay transmission charges proportionate to non-commissioned generating capacity, the transmission licensee should also be made liable to pay the annual fixed cost of the generator for the period of delay. In the alternative, the liabilities of parties using the Network for any delay should be addressed through the Indemnification agreement to be agreed mutually by the parties concerned. Additionally, on the above lines, the delay in commissioning of intervening system to be owned by SPPD would need to be addressed by Hon'ble Commission.
- 4) It is submitted that as commissioning of Solar Generation in the Solar Park would be in a phased manner. accordingly, the commissioning of transmission system should also be in phased manner matching with commissioning of generating capacity to reduce the impact of transmission charges on beneficiaries which would be levied through PoC mechanism.