



पावर ग्रिड कारपोरेशन ऑफ इंडिया लिमिटेड
(भारत सरकार का उद्यम)
POWER GRID CORPORATION OF INDIA LIMITED
(A Government of India Enterprise)



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C/Comml/RC

Date: 30.04.2015

The Secretary,
Central Electricity Regulatory Commission
3rd & 4th Floor, Chandralok Building,
Janpath, New-Delhi – 11 00 01

Subject: Comments/Suggestions/Objections in Draft amendment to
Connectivity Regulations, 2009 and Regulatory approval
Regulations, 2010.

Dear Sir

The Central Electricity Regulatory Commission in exercise of its powers conferred under sub-section (3) of Section 178 of The Electricity Act, 2003 read with Rule 3 of Electricity (Procedure for Previous Publication) Rules, 2005 has issued public notice inviting comments/suggestions/objections on the issued draft amendment to CERC (Grant of Connectivity, Long-Term Access and Medium Term Open Access in inter-state transmission and related matters) (Fourth Amendment) Regulations, 2015 and CERC (Grant of Regulatory Approval for execution of inter-state transmission scheme to Central Transmission Utility) (First Amendment) Regulations, 2015. Powergrid Corporation of India Limited, being the Central transmission Utility which coordinates, plans and implement the Inter-State Transmission Network for various Long Term Access, Medium Term Open Access applicants/customers has the following suggestions/proposals to make in the proposed amendment:

CERC (GRANT OF CONNECTIVITY, LONG-TERM ACCESS AND MEDIUM TERM OPEN ACCESS IN INTER-STATE TRANSMISSION AND RELATED MATTERS) (FOURTH AMENDMENT) REGULATIONS, 2015

<u>Amendment to Regulation 2 of the Principle Regulations</u>		<u>Insertion of Sub Clause 'f' to Clause 1 and Sub-Clause III to Clause 2</u>
PROPOSED AMENDMENT	COMMENTS	SUGGESTION
<p><u>Regulation 2 Clause (1) Sub- Clause(b)(i)(f):</u> Any company designated by the Central Government as Solar Power Park Developer;</p> <p><u>Regulation 2 Clause (1) Sub- Clause(b)(iii):</u> Any company designated by the Central Government as Solar Power Park Developer, in respect of long term access;</p>	<p>CERC in its explanatory memorandum to the proposed amendment has relied on the letter from MNRE wherein the intent of 'Government of India' was shown to provide a framework for setting up at least 25 solar parks each with a capacity exceeding 500 MW with a target of over 20,000 MW of solar power installed capacity in a span of 5 years from 2014-15 to 2018-19.</p> <p>It is evident that the clause aims at empowering the Central Government to designate 'Any Company' as a Solar Park Developer. But it is not beyond comprehension where central government empowers respective states, or respective states at their own, to meet the increasing demand in their own or neighbouring states, locates appropriate developer and designate power to them for development of 'Solar Parks'. Hence, it is proposed to replace 'Central Government' with 'Appropriate Government' and consequently insert a clause in</p>	<ol style="list-style-type: none"> 1. Replace the term 'Central Government' with 'Appropriate Government' along with a corresponding amendment in Regulation 2(1) defining appropriate government as Centre and the State Government respectively. 2. Include definition of 'Solar Park Developer' in Regulation 2 Clause (1).

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	<p>Regulation defining the appropriate government, being the centre and the state.</p> <p>Further, CERC should list parameters for a company to become eligible for developing a solar park by inserting a definition clause defining the 'Solar Park Developer'. Since a 'Solar Park Developer' is nascent term with potential of being in massive usage to meet the ambitious goals of government. To avoid complications in future it would be appropriate to have a clause defining the same.</p>	
<p><u>Amendment to Regulation 8 of the Principle Regulations</u></p>		<p><u>Insertion of Fourth Proviso to Clause (1)</u></p>
<p><u>Regulation 8 Clause (1) Fourth Proviso:</u> "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 authorised by the <u>Central Government</u> 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</p>	<p>Replace term 'Central Government' with 'Appropriate Government'</p>	<p>Replace term 'Central Government' with 'Appropriate Government'</p>

<p>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., and submit the documents to that effect to the CTU, alongwith the application for connectivity, with copy to the respective RLDC in whose control area it is located."</p>		
<p align="center"><u>CERC (GRANT OF REGULATORY APPROVAL FOR EXECUTION OF INTER-STATE TRANSMISSION SCHEME TO CENTRAL TRANSMISSION UTILITY) (FIRST AMENDMENT) REGULATIONS, 2015</u></p>		
<p><u>Amendment to Regulation 3 of the Principle Regulations</u></p>		<p><u>Insertion of Sub Clause '(iii)' to Clause 1</u></p>
<p><u>Regulation 3 Clause 1 Sub Clause (iii):</u> ISTS Scheme proposed by CTU, for which the <u>Central Government</u> 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>	<p>Replace term 'Central Government with 'Appropriate Government'</p>	<p>Replace term 'Central Government with 'Appropriate Government'</p>

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FURTHER POINTS OF CONCERNS:

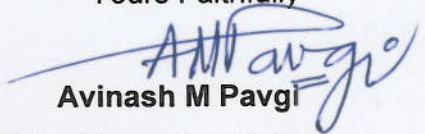
1. Multiple Points of Injection
 - a. Solar Park encompasses a number of generation developers necessitating multiple injections at ISTS Point. In the instant case of NP Kunta UMSP (1500 MW), there would be 6 nos. 220kV D/c feed from various generation developers (each D/c from one 250 MW block). Accordingly, in NP Kunta's LTA application made by M/s APSPCL multiple injections and drawls have been indicated by the solar park developer. However, above injection shall be from one site i.e. NP Kunta UMSP in one contiguous boundary alone.
 - b. As per the prevailing approved procedure, in LTA application, multiple injection with multiple drawl option is not admissible. During the 38th SR SCM/LTA meeting held on 07.03.2015 (relevant extracts of the MoM is annexed as "Annexure I") the issue of multiple injections was raised and it was requested to seek clarification from the Regulator in this regard.

It is submitted that the inherent nature of Solar Power Parks is such that Multiple Injections from various Generators becomes imminent. In view of this, it is proposed to permit multiple injections along with multiple drawl.
2. The Solar Park Developer while applying for the Connectivity requiring system strengthening for evacuation of power, must submit the construction Bank Guarantee along with the application as provided and applicable in the Connectivity Regulations, 2009.
3. The Transmission System so developed to evacuate power from the solar park shall become a part of ISTS network and transmission charges must be shared as per the Point of Connection Mechanism provided under the Sharing Regulations, once the scheduling of power has started from the generating station. Further directions are necessary for payment of transmission charges in case of delay in commissioning of generating unit/station where the transmission system for evacuation has already commissioned.

It is therefore requested that our submissions may be taken on record.

Thanking you,

Yours Faithfully


Avinash M Pavgi
(AGM – Regulatory Cell)