



Mytrah Energy (India) Private Limited
(Formerly known as Mytrah Energy (India) Limited
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To

Date: 14.05.2018

The Secretary,
Central Electricity Regulatory Commission
3rd & 4th Floor, Chanderlok Building,
36, Janpath, New Delhi- 110001
Email: secy@cercind.gov.in

Subject: Suggestions/comments on "Draft Central Electricity Regulatory Commission (Sharing of Inter State Transmission Charges and Losses) Regulations, Sixth Amendment, 2018.

Dear Sir,

At the onset, we would like to introduce ourselves as Mytrah Energy (India) Pvt Ltd, one of the largest Independent Power Producers ('IPP') in renewable energy in India with over 1080 MW of wind installed capacity through 18 projects spread across 8 States (presence in Andhra Pradesh, Gujarat, Karnataka, Rajasthan, Maharashtra, Madhya Pradesh, Telangana and Tamil Nadu). We aim to own and operate 3500 MW of renewable power in India. We extended business segment into solar by winning 422 MW of bids in three states viz. Telangana, Punjab and Karnataka, of which we have already commissioned around 197 MW and the remaining projects are under various stages of commissioning and construction.

Before traversing into the details of draft Regulations, we would like to extend our sincere gratitude to CERC for its kind support towards development of Renewable Energy.

We would like to thank CERC for providing opportunity to submit our suggestions on the "Draft CERC (Sharing of Inter State Transmission Charges and Losses) Regulations, Sixth Amendment, 2018".

We hereby submit our views for your kind consideration.

Yours sincerely,

For Mytrah Energy (India) Pvt. Limited

Annexure 1

S. No	Clause No.	Description	Suggestions / Comments by Mytrah Energy
1	3 (aa)(ii)	Such generation capacity has been declared under commercial operation between 13.02.2018 till 31.3.2022;	<p>The draft Regulation proposed that only Wind & Solar Power Projects declared CoD before 31.3.2022, would be eligible for No transmission charges and losses for the use of ISTS network.</p> <p>We would like to submit that WPDs require 21 Months for commission the Wind Power Project after issuance of LoA (18 months from signing of PPA) and the same is also considered by SECI in its latest bid.</p> <p>In view of above, the WPDs will face an uncertainty of applicable ISTS charges & losses even after getting bid even in the year of 2021. The consideration for waiver of ISTS charges and losses at the time of bidding will be an additional risk for WPDs / bidders, however the bids would be issued before 31.03.2022.</p> <p>Therefore, It is our humble submission to the Hon'ble Commission to amend the proposed regulation and allow the waiver of ISTS charges and losses to all wind & Solar projects which to be bided before 31.03.2022 instead of commission before 31.03.2022 to mitigate the risk of developers after bidding of projects.</p>

S. No	Clause No.	Description	Suggestions / Comments by Mytrah Energy
2	Additional Comments	Waiver of STU charges & losses for substation of STU, connected directly with ISTS network	<p>We would like to submit that in the present scenario, bidders are restrained to bid from few windy sites only, which has nearest CTU connectivity in the vicinity. There are many other windy sites across the states where CTU connectivity is not available for the bidders or having a nearest STU connectivity, which is directly connected with ISTS network. In the absence of CTU substation, bidder has an option to connect to the nearest STU and able to transmit power to outside of the state through ISTS.</p> <p>It is to be noted that bidder has to bear the respective state Open Access (OA) charges & losses and there is a possibility of changes such InSTS OA charges & losses in future, which provide an uncertainty to bidder and make the bid unviable. If the bidder connects project in the substation of STU and that sub-station is connected directly with CTU network, the charges & losses would be almost negligible for STU network and also support to use of high voltage unutilized sub-station of STU.</p> <p>In view of above, it is our humble submission to the Hon'ble Commission for consider such sub-station of STU as deemed CTU network of ISTS and allow to waive-off the OA charges (STU charges & Losses) to the bidders who won the bids through competitive bidding process.</p>