



6964/2015/CRU-CERC

CIN : L24110GJ1987PLC009362

Tel.: +91-120-6149 600 E-mail: contact@gfl.co.in
Fax: +91-120-6149 610 Website: www.gfl.co.in



GUJARAT
FLUOROCHEMICALS
LIMITED

INOX Towers, 17, Sector 16-A, NOIDA-201301 (U.P.) INDIA

Ref No: GFL/CERC/18-19/01

Date: 28.08.2018

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

Sub: Submission of comments/suggestions on proposed Draft Central Electricity Regulatory Commission (Grant of Connectivity, Long-term Access and Medium-term Open Access in inter-State Transmission and related matters) (Seventh Amendment) Regulations, 2018.

Ref: CERC Public Notice Ref No. L-1/ (3)/2009-CERC dated 09.08.2018.

Dear Sir,

At the outset we are pleased to introduce ourselves as Gujarat Fluorochemicals Limited (GFL), engaged in diverse businesses including Industrial Gases, Refrigerants, Chemicals, Cryogenic Engineering, Renewable Energy and Entertainment. GFL has a manufacturing unit for its chemical products at Ranjit Nagar, Taluka Ghogamba, District Panchmahal, Gujarat- 389 380.

GFL is also planning to setup own Wind Power Plant in order to utilize the generated RE power as captive consumption at its own manufacturing unit or sale to any other RPO obligated entities including Discom.

We welcome & appreciate the Hon'ble Commission step to amend the Grant of 'Connectivity, Long-term Access and Medium-term Open Access in inter-State Transmission Regulation'.

We would like to submit w.r.t. Transmission Charges & Losses applicability for the generators connected with ISTS system where the said connectivity regulations cover it as:

26. Transmission Charges

The transmission charges for use of the inter-State Transmission system shall be recovered from the long-term customers and the medium-term customers in accordance with terms and conditions of tariff specified by the Commission from time to time:

Page 1 of 3





**GUJARAT
FLUOROCHEMICALS
LIMITED**

CIN : L24110GJ1987PLC009362

Tel.: +91-120-6149 600 E-mail: contact@gfl.co.in
Fax: +91-120-6149 610 Website: www.gfl.co.in

INOX Towers, 17, Sector 16-A, NOIDA-201301 (U.P.) INDIA

Provided that if the State network is also being used in the access as a part of inter-State Transmission system for the conveyance of electricity across the territory of an intervening State as well as conveyance within the State which is incidental to such inter-State Transmission of electricity, recovery of charges for such State network and terms and conditions thereof shall be in accordance with the regulation as may be specified by the Commission under Section 36 of the Act for intervening transmission facilities, if such charges and terms and conditions cannot be mutually agreed upon by the licensees;

Provided that any disagreement on transmission charges for such State network as specified above, shall not be the sole reason for denying access and either party may approach the Commission for determination of transmission charges for such State network

31. Transmission Losses

The buyers of electricity shall bear apportioned losses in the transmission system as estimated by the Regional Power Committee.

In this regard, we would like to highlight the prevailing application of transmission charges and losses on generator and would like to bring to your kind attention Ministry of Power Order Reference No 23/12/2016-R&R dated 13th February 2018 (copy enclosed). It states that

4.0

In suspension of Ministry of Power's (MoP) earlier order No 23/12/2016-R&R dated 30th September 2016 and order No 23/12/2016-R&R dated 14th June 2017, it is hereby notified that –

- i. *For Generation project based on Solar and Wind resources, no interstate transmission charges and losses will be levied on transmission of the electricity through the Inter-State Transmission System for sale of power by such projects commissioned till 31st March 2022.*

Provided that the above waiver will be available for a period of 25 years from the date of commissioning of such projects.

Provided further that the above waiver will be available for Solar and Wind projects entering in to PPAs with all entities, including Distribution Companies for sale of power from Solar and Wind power projects for compliance of their renewable purchase obligation.

Handwritten signature/initials



CIN : L24110GJ1987PLC009362

Tel: +91-120-6149 600 E-mail: contact@gfl.co.in
Fax: +91-120-6149 610 Website: www.gfl.co.in



**GUJARAT
FLUOROCHEMICALS
LIMITED**

INOX Towers, 17, Sector 16-A, NOIDA-201301 (U.P.) INDIA

Provided further that the above waiver will be allowed only to those solar and wind projects that are awarded through competitive bidding process in accordance with guideline issued by Central Government.

As per MoP, it is clear that there is a waiver of transmission charges & losses for ISTS connected Solar/ Wind Generators if it has emerged through a competitive bidding process in accordance with guideline issued by Central Government.

In view of the above we feel that the waiver provided under the MoP order dated 13th February 2018 should be incorporated appropriately under this regulation in order to have more consistency & clarity in the matter.

Thanking you,

Yours faithfully,

For **Gujarat Fluorochemicals Limited**



for **Manoj Dixit**
Authorized Signatory

Encl. As above

No. 23/12/2016-R&R
Government of India
Ministry of Power

Shram Shakti Bhawan, Rafi Marg,
New Delhi, 13th February, 2018

ORDER

Subject: Waiver of inter-state transmission charges and losses on transmission of the electricity generated from solar and wind sources of energy under para 6.4(6) of the revised Tariff Policy, 2016.

- 1.0 Para 6.4(6) of the revised Tariff Policy 2016 notified on 28.01.2016 provides that -
"In order to further encourage renewable sources of energy, no inter-State transmission charges and losses may be levied till such period as may be notified by the Central Government on transmission of the electricity generated from solar and wind sources of energy through the inter-state transmission system for sale."
- 2.0 In view of the above provisions of Tariff Policy 2016, the Ministry of Power had earlier issued Order on 30th September, 2016 which was subsequently modified vide Order dated 14th June, 2017.
- 3.0 The waiver of inter-state transmission charges and losses on transmission of the electricity generated from solar and wind sources of energy was available for solar projects commissioned upto 31.12.2019 and for wind projects commissioned upto 31.03.2019. The waiver was available for a period of 25 years from the date of commissioning of such projects and was available only for the projects entering into Power Purchase Agreements (PPAs) for sale of electricity to the Distribution Companies for compliance of their renewable purchase obligation. Such waiver was available only to those solar and wind projects that are awarded through competitive bidding process.
- 4.0 In supersession of Ministry of Power's earlier order No 23/12/2016-R&R dated 30th September, 2016 and Order No 23/12/2016-R&R dated 14th June, 2017, it is hereby notified that -
 - i. For generation projects based on solar and wind resources, no interstate transmission charges and losses will be levied on transmission of the electricity through the inter-state transmission system for sale of power by such projects commissioned till 31st March 2022.
Provided that the above waiver will be available for a period of 25 years from the date of commissioning of such projects
Provided further that the above waiver will be available for solar and wind projects entering into PPAs with all entities, including Distribution Companies,

for sale of power from solar and wind power projects for compliance of their renewable purchase obligation.

Provided further that the above waiver will be allowed only to those solar and wind projects that are awarded through competitive bidding process in accordance with the guidelines issued by Central Government.

- 5.0 This Order, irrespective of the purchasing entity, shall be applied prospectively i.e. from the date of issue of Order.
- 6.0 This issues with the approval of Minister of State (I/C) for Power and NRE.


(Ghanshyam Prasad)
Chief Engineer (RR & OM)
Tel: 2371 0389

To,
1. Principal Secretary/Secretary (Power/Energy), State Governments/UTs
2. Secretary, State Electricity Regulatory Commissions/ Joint Electricity Regulatory Commissions

Copy to:

1. Secretary, MNRE, CGO Complex, New Delhi
2. Chairperson, CEA, Sewa Bhawan, RK Puram, New Delhi
3. Secretary, CERC/FOR, Chandralok Building, Janpath, New Delhi

Copy also for information to:

1. All Joint Secretaries, Ministry of Power
2. PS to MOS (I/C) for Power and NRE
3. PPS to Secy.(P), PPS to AS(SP), PPS to CE(RR)