



Submission of comments on Draft CERC (Grant of Connectivity, Long-term Access and Medium-term Open Access in inter-State Transmission and related matters) (Seventh Amendment) Regulations, 2018

Neha Deswal To: secy

08/31/2018 05:42 PM

Cc: Haziq Beg

Bcc: ~~XXXXXXXXXX~~

Respected Sir/Madam,

This is in reference to the Hon'ble Central Electricity Regulatory Commission notice dated August 9th, 2018 inviting comments/suggestions/ objections on the 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. Our Submission on the said Regulations are attached in this mail.

We request the Hon'ble Commission to consider our submission favorably while finalizing the Regulations.



IEDCL's Comments on Draft CERC Connectivity Regulation 7th Amendment.pdf

Thanking You,

Yours faithfully,

For IL&FS Energy Development Company Limited

Neha Deswal |Assistant Manager | Regulatory

IL&FS Energy Development Company Limited
1st Floor Corporate Office Tower, Ambience Mall Complex
Ambience Island NH-8 Gurugram 122001
Direct + 91 0124-4716015 | Fax + 91 0124-4716120
Website: <http://www.ilfsindia.com> | Email id: renu.kumari@ilfsindia.com

ADAPTIVE | COLLABORATIVE | DRIVE | INCLUSIVE | CONSCIENTIOUS

Handwritten notes:
S. 04/09/18
Chief (Ops)
27/08/18
5/9
20.9.18

Handwritten signatures:
D. K. Singh
Ajay

Handwritten notes:
60/58
5.9.18

IEDCL's Comments on the Draft CERC (Grant of Connectivity, Long Term Access and Medium term Open Access in inter-State Transmission and related matters) (Seventh Amendment) Regulations, 2018

The Honorable Commission in the Draft 7th Amendment to "Connectivity Regulation" has proposed to integrate the provisions with regard to the Final Detailed Procedure for Connectivity of RE projects notified via order dated May 14, 2018 along with few other amendments. However, in our view there are certain issues with regard to the grant of connectivity to the RE Park Developers and RE Project Developers in the final procedure and subsequently in the proposed draft Regulations. Clause-wise detailed comments on the said matter are as follows:

S.No	As proposed by CERC	Comments / Suggestions / Objections
1	<p>8. Grant of Connectivity</p> <p>“(2A) Applications for grant of Connectivity made by applicants covered under sub-clauses (aa), (cc), (e), (f), (g) and (h) of Clause (1)(b)(i) of Regulation 2 shall be processed in two stages:</p> <p>(a) Stage-I Connectivity (b) Stage-II Connectivity”</p>	<p>As per the present detailed procedure, while providing Stage I connectivity, the CTU shall provide two alternate sub-stations for connectivity and the voltage at which the connectivity would be available. In our view, the CTU should also provide a time frame as on when the connectivity would be completed from the date of application of Stage II Connectivity. Such indicative time frame would enable the RE project developers and RE park developers to estimate risk associated with the connectivity and accordingly take actions to mitigate the same.</p>
2	<p>8. Grant of Connectivity</p> <p>“(2A) ... (b) Stage-II Connectivity”</p>	<p>Clause 9.2 of the Detailed Procedure for Grid Connectivity dated May 14, 2018 sets out various milestones to be achieved by the 'Applicant' before applying for connectivity at Stage II. It should be noted that in case of a Solar/Wind/Hybrid Park Developer, achieving financial closure or release of 10% funds for generation project milestones is not possible without identification of the RE Project Developer . Such developers would be selected based on Competitive bidding and since the parks are required to be ready prior to development of the solar projects under the Plug and Play Model facilitated by the Government of India, imposing such conditions would delay the park readiness and hence implementation of solar projects.</p> <p>Therefore, in our view the MNRE approved Solar Parks should be entitled to Stage II connectivity.</p>

The Honorable Commission in the Draft 7th Amendment to “Connectivity Regulation” has proposed to integrate the provisions with regard to the Final Detailed Procedure for Connectivity of RE projects notified via order dated May 14, 2018 along with few other amendments. However, in our view there are certain issues with regard to the grant of connectivity to the RE Park Developers and RE Project Developers in the final procedure and subsequently in the proposed draft Regulations. Clause-wise detailed comments on the said matter are as follows:

S.No	As proposed by CERC	Comments / Suggestions / Objections
1	<p>8. Grant of Connectivity</p> <p>“(2A) Applications for grant of Connectivity made by applicants covered under sub-clauses (aa), (cc), (e), (f), (g) and (h) of Clause (1)(b)(i) of Regulation 2 shall be processed in two stages:</p> <p>(a) Stage-I Connectivity (b) Stage-II Connectivity”</p>	<p>As per the present detailed procedure, while providing Stage I connectivity, the CTU shall provide two alternate sub-stations for connectivity and the voltage at which the connectivity would be available. In our view, the CTU should also provide a time frame as on when the connectivity would be completed from the date of application of Stage II Connectivity. Such indicative time frame would enable the RE project developers and RE park developers to estimate risk associated with the connectivity and accordingly take actions to mitigate the same.</p>
2	<p>8. Grant of Connectivity</p> <p>“(2A) ... (b) Stage-II Connectivity”</p>	<p>Clause 9.2 of the Detailed Procedure for Grid Connectivity dated May 14, 2018 sets out various milestones to be achieved by the ‘Applicant’ before applying for connectivity at Stage II. It should be noted that in case of a Solar/Wind/Hybrid Park Developer, achieving financial closure or release of 10% funds for generation project milestones is not possible without identification of the RE Project Developer . Such developers would be selected based on Competitive bidding and since the parks are required to be ready prior to development of the solar projects under the Plug and Play Model facilitated by the Government of India, imposing such conditions would delay the park readiness and hence implementation of solar projects.</p> <p>Therefore, in our view the MNRE approved Solar Parks should be entitled to Stage II connectivity.</p>

IEDCL's Comments on the Draft CERC (Grant of Connectivity, Long Term Access and Medium term Open Access in inter-State Transmission and related matters) (Seventh Amendment) Regulations, 2018

The Honorable Commission in the Draft 7th Amendment to "Connectivity Regulation" has proposed to integrate the provisions with regard to the Final Detailed Procedure for Connectivity of RE projects notified via order dated May 14, 2018 along with few other amendments. However, in our view there are certain issues with regard to the grant of connectivity to the RE Park Developers and RE Project Developers in the final procedure and subsequently in the proposed draft Regulations. Clause-wise detailed comments on the said matter are as follows:

S.No	As proposed by CERC	Comments / Suggestions / Objections
1	<p>8. Grant of Connectivity</p> <p>"(2A) Applications for grant of Connectivity made by applicants covered under sub-clauses (aa), (cc), (e), (f), (g) and (h) of Clause (1)(b)(i) of Regulation 2 shall be processed in two stages:</p> <p>(a) Stage-I Connectivity (b) Stage-II Connectivity"</p>	<p>As per the present detailed procedure, while providing Stage I connectivity, the CTU shall provide two alternate sub-stations for connectivity and the voltage at which the connectivity would be available. In our view, the CTU should also provide a time frame as on when the connectivity would be completed from the date of application of Stage II Connectivity. Such indicative time frame would enable the RE project developers and RE park developers to estimate risk associated with the connectivity and accordingly take actions to mitigate the same.</p>
2	<p>8. Grant of Connectivity</p> <p>"(2A) ... (b) Stage-II Connectivity"</p>	<p>Clause 9.2 of the Detailed Procedure for Grid Connectivity dated May 14, 2018 sets out various milestones to be achieved by the 'Applicant' before applying for connectivity at Stage II. It should be noted that in case of a Solar/Wind/Hybrid Park Developer, achieving financial closure or release of 10% funds for generation project milestones is not possible without identification of the RE Project Developer . Such developers would be selected based on Competitive bidding and since the parks are required to be ready prior to development of the solar projects under the Plug and Play Model facilitated by the Government of India, imposing such conditions would delay the park readiness and hence implementation of solar projects.</p> <p>Therefore, in our view the MNRE approved Solar Parks should be entitled to Stage II connectivity.</p>