



6899/2018/CRU-CERC
सोलर एनर्जी कॉर्पोरेशन ऑफ इंडिया लिमिटेड
(भारत सरकार का उपक्रम)
Solar Energy Corporation of India Ltd.
(A Government of India Enterprise)

स्वच्छ भारत - स्वच्छ ऊर्जा

SECI/CERC/PS/ 2018-19 /25003

Dt: 21.08.2018

To
The Secretary
Central Electricity Regulatory Commission (CERC)
3rd and 4th Floor Chanderlok Building
36, Janpath
New Delhi - 110 001

Sub: Comments/Suggestions on Draft procedure for Grant of Connectivity, Long Term Access and Medium Term open access in inter-state Transmission and related matter

Ref: Public Notice of CERC dated 9th August 2018

Sir

This has reference to the public notice of dated 9th August 2018 wherein the Honourable CERC has invited Comments/Suggestions of the stakeholders on Draft "procedure for Grant of Connectivity, Long Term Access and Medium Term open access in inter-state Transmission and related matter"

SECI's Comments/Suggestions are enclosed herewith for kind consideration of the Honourable Commission please

It is therefore requested that necessary changes in the existing guideline may be effected at the earliest and the same may be communicated to SECI, as required.

Thanking you,

Yours faithfully,



(S.K.Mishra)

Director (Power Systems)

Comments /Suggestions on the Draft Connectivity procedure to the ISTS and other related matter Regulations

| SL. NO | EXISTING CLAUSE | SECI's View |
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| 1. | <p>Clause 1.8 & 1.10</p> <p>Considering the submissions of SECI, it is proposed that Central Government nominated Implementing Agency will be eligible for grant of Stage-I Connectivity and LTA on behalf of generators based on renewable source(s) or Renewable Hybrid projects. The said Implementing Agency or Designated Agency may apply for Stage-I Connectivity or LTA to the Nodal agency as per the extant Connectivity Regulations and detailed procedure issued therein.</p> | <p>As per clause of 1.6.5 of connectivity regulation, CTU shall share the available capacity of ISTS to bidding agency such as SECI. In that case SECI may take the same information for bidding purpose.</p> <p>Before the bidding, SECI shall file connectivity application as per available data shared by CTU on behalf of Generator. Based on approval from CTU, SECI shall float bidding document. This will save time and certainty to generator for investment and which will also eliminate risk of mismatch between development of project and connected substation/transmission line.</p> <p>SECI's tender comes under various magnitude i.e. 1000MW, 1200MW, 2000MW and 10,000MW, in which bidders are allowed to bid for Min capacity of 50MW. However, it was observed that in a typical 2000MW tender 5 to 6 bidders were selected. Accordingly for a typical location SECI shall take Bulk Stage-I connectivity and distribute the capacity amongst the successful bidders based on LOI</p> <p>Further, it is also requested that no Government nominated implementing agency should hold the connectivity exceeding 9 months from date of Stage-I</p> |

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| | | <p>Connectivity offered by CTU. In case it is goes beyond the 9 months then said connectivity will stand cancelled. This will eliminate the Risk of blocking connectivity.</p> |
| 2. | <p>Clause 1.14: Storage: "means energy storage system utilizing methods and technologies like, Solid State Batteries, Flow Batteries, Pumped Storage,hydro-power, Compressed Air, or any other technology, to store various forms of energy;" the word "Battery Storage"</p> | <p>Storage: "means energy storage system utilizing methods and technologies like, Solid State Batteries, Flow Batteries, Pumped Storage, hydro-power, Compressed Air, or any other technology, to store and deliver various forms of energy;" the word replaced by "Energy Storage"</p> |
| 3. | <p>Amendment in Regulation 12: Clause 5.3: A new clause has been proposed to be added after clause (1) of Regulation 12 to facilitate grant of long term access to the new category of applicants for long term access As under: "(1A) Notwithstanding anything contained in Clause 2A of Regulation 8, Stage-II Connectivity shall not be a pre-requisite for applying for LTA for Applicants under Regulation 2(1)(b)(i)(e) and 2(1)(b)(i)(g)."</p> | <p>In the draft proposal it is clearly mentioned that "It will be difficult for the implementing agency or designated agency to indicate firm beneficiary/target beneficiary in the applications for LTA prior to completion of Bid..... It is proposed that the central government nominated implementing agency can apply for LTA without indicating any beneficiary /region, if not available at the time of filing of application for grant of LTA". In view of the above, it is proposed that in case quantum (MW) change more than 100MW or 40% of applied quantum (MW) then in line with proposed connectivity regulation, Government nominated implementing agency will be exempted for fresh LTA application.</p> |