

सं.:SECI/SD/NSM/2019/35085

दिनांक: 31-12-2019

सचिव

केंद्रीय विद्युत नियामक आयोग

3 और 4 वीं मंजिल, चंद्रलोक बिल्डिंग, 36 जनपथ, नई दिल्ली

विषय: Draft CERC (sharing of Inter-State Transmission Charges and Losses) Regulations, 2019 (Extension of Time) reg.

महोदय,

This has reference to the draft CERC Regulations issued on 31-10-2019 on the subject. Our comments and suggestions on same are as follows for kind consideration:

**A. Chapter 3-11. (1) (c)**

It has been categorically mentioned that ISTS waiver shall be given to solar/wind generation projects from the date of declaration of commercial operation.


It is proposed that in place of the same, it may be mentioned that transmission projects being erected/to be erected for carrying RE power once completed may be put under POC without any linking it to commercial operation of the planned renewable generation projects as this regulation has been made to promote renewable generation. This will secure the interest of the transmission system provider, who are constructing the transmission lines.

- B.** Chapter 3-11. (2) (4) proposes that generating station will pay transmission charges if COD is delayed beyond COD of transmission system. This may be removed: at best it may be done for those cases where delay is on account of developers alone and no extension is granted by Government Nodal Agency and the charges collected may be kept in a pool for deduction of transmission charges of respective DISCOMS.
- C.** Chapter 3-11 (1) (i) Government of India has planned 66.5 GW transmission system for renewable generation systems, which are under different stages of construction. As per the plan, the transmission system will start coming from December, 2020 onwards in a phased manner and may continue up to December, 2022. It is proposed that the ISTS waiver may be continued up to 31<sup>st</sup> December, 2022 for all the renewable projects which shall be awarded before that date. This will ensure the proper utilization of transmission system and give a big boost to the renewable generation.
- D.** The proposed regulation do not have a separate treatment for solar/wind parks. It is proposed that an exception may be carved out for the Solar Park / Wind Parks being developed under MNRE Scheme for the benefit of State Buying Utilities and that a maximum time period of around 4 years or time period as deemed fit by the Hon'ble Commission be allowed for utilization of transmission capacity being created for such parks to a reasonable level. It is proposed that Transmission System once completed may be put under the existing POC mechanism and transmission charges will be levied on such solar/wind/hybrid park not completed within four year and if no extension given to them for completion by any Government agency. Till such time available capacity may be utilized for the usage under short term and / or medium-term access

  
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- E. As existing provision of ISTS waiver is available only for solar and Wind projects, it is proposed that the ISTS waiver may be extended to Hybrid generation of Solar and Wind with and without storage and also to Solar with storage and Wind with storage generation and Stand-alone Storage also.
- F. As Nation has set the target of 175 GW RE power by 2022 and 450 GW RE power by 2030, renewable generation plants to that capacity are to be installed to meet the existing and incoming demand. Further, these plants will help in reducing CO<sub>2</sub> emission and help achieve commitment given to World Forums. It is, therefore, proposed that existing ISTS waiver for the RPO obligation, need to be extended to all renewable generating plants connecting to the ISTS grid whether it is being used for the RPO obligation or not.

धन्यवाद सहित।

  
(श्रीधर सिंह) 31/12/2019  
एजीएम (विद्युत प्रणाली)