



Reference: ARPPL – CERC – Power Supply-20200810

Date: 10th August 2020

To,
Shilpa Agarwal
Joint Chief (Engineering)
CERC, 3rd & 4th Floor, Chanderlok Building,
36, Janpath, New Delhi- 110001
Ph: 91-11-23353503
secy@cercind.gov.in
shilpa@cercind.gov.in

Subject: Comments on Draft Central Electricity Regulatory Commission (Power Supply) Regulations, 2020.

Respected Madam,

Greetings from Ayana Renewable Power Private Limited.

Ayana Renewable Power has been set up to develop significant megawatts (MWs) of renewable energy generation capacities in India. Presently, the company is developing 1100 MW of Utility scale solar projects in India.

The Draft Power Supply Regulations, 2020 is an important regulation which would change give positive changes to the Power Purchase Agreement. Our comments/observations are mentioned in Appendix 1 for your kind reference.

Looking forward to hear from you

Thanking You.

Yours Faithfully,
For Ayana Renewable Power Private Limited

Sharat Ranjan
DGM Business Development

Ayana Renewable Power Private Limited

Registered & Corporate Office:

3rd Floor, Sheraton Grand Hotel, Brigade Gateway Campus, 26/1, Dr. Rajkumar Road, Bangalore – 560055, Karnataka.

CIN: U40106KA2017PTC101000

Tel: +91 080-48511001 email: contact@ayanapower.com website: www.ayanapower.com



Appendix 1 – Suggested Comments on Draft Power Supply Regulations

Sl. No.	Clause No. /Page No.	Existing Clause	Suggested Amendments / Clarifications Sought
1	Clause 3, Page no 3	Scope and Applicability: These Regulations shall be applicable to generating station, transmission system and beneficiary, where there is a specific provision in the Agreement between generating company and beneficiary or between transmission licensee and beneficiary, as the case may be, or in the relevant Regulations of the Commission, for regulation of power supply in case of non-payment of outstanding dues or non-maintenance of Letter of Credit or any other agreed Payment Security Mechanism.”	Will it be applicable to the Projects which are being allocated on International Competitive bidding by SECI and NTPC? Will it be applicable to the PPA executed in past with SECI/NTPC or will it be applicable to the new PPA?
2	Clause 4, Page no 2	New sub-clause (e-i) shall be added after sub-clause (e) of Clause (1) of Regulation 2 of the Principal Regulations as under: 45th day from date of presentation of bills in respect of generating companies covered under the Central Electricity Regulatory Commission (Terms and Conditions of Tariff) Regulations, 2019, as amended from time to time; or...	The due date should be reduced from 45 days to 30 days as the debt cycle are on monthly basis.

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