

Date: 19.08.2018

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

Sub: Submission of comments/suggestions on proposed Draft Amendment to Detailed Procedure for "Grant of Connectivity to Projects Based on Renewable Sources to Inter-State Transmission System"

Ref: CERC Public Notice No. L-1/(3)/2009-CERC dated 24.07.2020.

Dear Sir,

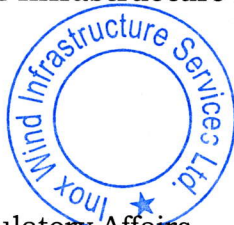
On behalf of 'Inox Wind Infrastructure Services Limited (IWISL)', we appreciate the proposal to amend the Detailed Procedure for "Grant of Connectivity to Projects Based on Renewable Sources to Inter-State Transmission System" and comments/suggestions have been asked from all the stake holders for necessary input for finalization.

In this regard, it is requested to kindly review the requirements for connectivity transfer along with few other suggestions. We proposed the honorable Commission to kindly consider our suggestions with revised framed Para enclosed herewith as **Annexure-A** for necessary incorporation please.

Thanking you,

Yours faithfully,
For **Inox Wind Infrastructure Services Limited**


Ravi Sinha
Manager- Regulatory Affairs



Encl. As above.

Annexure-A

SN	Particulars Head	Existing Provisions	Proposed Provisions	INOX Submissions
1	5.2 Utilisation of Connectivity granted to the Parent Company by its Subsidiary company (ies) and Transfer of Connectivity	<p>5.2.1 The Connectivity granted to a company may be utilised by its wholly owned (100%) subsidiary company(ies) including SPVs. In such cases, the parent company cannot sell its shareholding in the subsidiary company (ies) before the lock-in period of one year after the commencement of supply of power from such subsidiary.</p> <p>In case of more than one wholly owned (100%) subsidiary of the same company, the lock-in period of one year shall apply from commencement of supply of power from the last such subsidiary. An illustration is given below: "A company is granted Connectivity for 1000 MW and it wins a bid for 250 MW. It forms five wholly owned (100%) subsidiaries of 50 MW each. In such a case lock-in period shall be 1 year from commencement of supply</p>	<p>The utilisation and transfer of Connectivity shall be governed in accordance with Clause 8A of the Connectivity Regulations.</p> <p>(i.e. "8A. <i>Transfer of Connectivity and LTA</i> A person shall not transfer, assign or pledge its connectivity or LTA either in full or parts and the associated rights and obligations to any other person.</p> <p><i>Provided that the above provision shall not be applicable to applicants defined under Regulation 2(1)(b)(i)(g).</i></p> <p><i>Provided further that 100% subsidiary companies shall be allowed to transfer their connectivity and LTA to the parent company and vice versa one year after achieving commercial</i></p>	<p>It is requested to kindly review the requirements for connectivity transfer. We proposed the honorable Commission to kindly consider the below revised Para framed with our suggestion:</p> <p>"</p> <p>.....</p> <p>Provided further that transfer of Connectivity and LTA from the parent company to more than one 100% subsidiary company shall be permitted one year after the commercial operation of the generating station of the last subsidiary and subject to minimum capacity as per Regulation 2(1)(b)"</p> <p>....."</p> <p>....."</p>





2	9.2.ii. Submissions of land documents	Nil	<p>operation of Renewable Energy generating station(s):</p> <p><i>Provided further that transfer of Connectivity and LTA from the parent company to more than one 100% subsidiary shall be permitted one year after the commercial operation of the generating station of the last subsidiary and subject to minimum capacity as per Regulation 2(1)(b):</i></p> <p><i>Provided also that till such Connectivity and LTA are transferred, the concerned subsidiary company(ies) shall be allowed to utilize the Connectivity and LTA granted to the parent company and vice versa.”)</i></p>	
			<p>Note: The entity shall submit registered documents regarding land rights in its favour. The documents, if not in English or Hindi language, shall be furnished along with its</p>	<p>It is requested to include submission of copy of registered Lease DEED/SALE DEED documents regarding land rights in connectivity grantee favor.</p>

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			English or Hindi translation from authorized translators.	
3	10.11 return of Conn-BG1 and Conn-BG2	Conn-BG shall be discharged six months after commencement of evacuation of power from the renewable project.	Conn-BG1 and Conn-BG2, if not encashed in accordance with Clause 9.3.3 or Clause 10.10(b) shall be returned within 30 days of declaration of commercial operation of the generation project	Conn-BG1 and Conn-BG2, if not encashed in accordance with Clause 9.3.3 or Clause 10.10(b) shall be returned within 30 days of declaration of commercial operation of the generation project on proportionate basis equivalent to the commissioned capacity in a progressive manner.

