

**Senvion Wind Technology Private Limited**

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To,  
Sh. Sanoj K Jha, IAS  
Secretary  
CERC  
Chandralok Building  
36, Janpath, New Delhi -110 001

**Date: 16<sup>th</sup> Aug 2020**

Dear Sir,

**Sub: Comments on Draft Detailed Procedure for Grant of Connectivity to projects based on renewable sources to inter-State transmission system issued on 24<sup>th</sup> July 2020**

We herewith submit our comments on abovementioned subject. We appreciate that the procedures are being amended largely owing to 7th Amendment to the Central Electricity Regulatory Commission (Grant of Connectivity, Long-term Access and Medium-term Open Access in inter-State Transmission and related matters) Regulations, 2009 and thus the comments have been restricted accordingly.

1. **5(3) Scope of Bays:** While the draft procedures have mentioned that developers can construct bays, it is suggested that a defined timeline in granting approvals should be also provided. This will provide more certainty and in case CTU does not approve, the same can be taken up by PGCIL in time, without affecting the schedule of the project.
2. **7(3) Stage 1 Connectivity:** It has been mentioned that the connectivity shall be granted at the location mentioned within 60 days of the receipt of application. However, it appears that the provision of mentioning primary and secondary location is being removed. If that being the case, developers would be even more uncertain about the alternate locations. The change in location directly affects the costs and since the price has been realized after competitive bidding, no trueing up is carried out. It is requested to provide more clarity on the same and also a possible redressal mechanism in case the variation in costs is more than a specified percentage.
3. **Connectivity for Hybrid:** It has been mentioned that in case of multiple locations, the connectivity can be applied for the contracted capacity from each location. This is a welcome change, however, the same has not been extended to the co-located hybrid plants. In that case, there will always be tendency to set up plants at multiple location and the benefits of co-location may not be realized. Thus, it is suggested that for co-location similar provision should be introduced.

4. **Application for Connectivity 6.5:** It has been mentioned that nodal agency post scrutiny will intimate the deficiencies in the application and rectified application if made on the last day of the month in which application has been made, will be taken up in subsequent months. It is suggested that the rectified applications to be considered with time and stamp of the application originally made. As it is online submission, sometimes mere clarification delays the processing.

We are hopeful the comments will be ascertained comprehensively during finalization of the procedures.

**Thanking you,**

Yours Sincerely,



Saurabh Shankar Srivastava  
Head (Regulations & Advocacy)