

Date: 03rd October 2022

To,
Shri Harpreet Singh Pruthi
Secretary,
Central Electricity Regulatory Commission,
Chanderlok Building, Janpath,
New Delhi

Subject: Suggestions /comments on the Draft Central Electricity Regulatory Commission (Sharing of InterState Transmission Charges and Losses) (First Amendment) Regulations, 2022.

Dear Sir,

We sincerely appreciate Govt. of India's and CERC's effort in providing conducive regulations and policies in promoting Renewable sources of energy. We are grateful for your continued guidance, and assurance you have offered, by enabling a robust and healthy policy environment to thrive in the country.

We would like to thank you for the opportunity to raise our key concerns & suggestions on the aforementioned subject.

We would like to draw your kind attention to incorporate MoP order dated 15th January 2021 and subsequent orders on *Waiver of Inter-State Transmission charges and losses on transmission of electricity generated from solar and wind sources of energy*, to provide waiver of transmission charges and losses to Solar PV manufacturing linked tender to incentivize generators to setup solar manufacturing capacity along with setting up solar plants. We request commission to incorporate below clause in the regulation as below:

No transmission charges and losses will be applicable for Solar PV power plants commissioned under SECI Tender for manufacturing linked capacity scheme (RFS No SECI/C&P/RfS/2GW Manufacturing/P-3/R1/062019 dated 25.06.2019) for sale to entities having RPO, irrespective of whether this power is within RPO or not.

We are sure that our suggestions on the issues described in the attached document, will restore sound, strategic market balancing decisions.

We express our sincere gratitude that most of the industry grievances in the past have been addressed time to time, which has helped the industry to make significant progress in deployment and scaling up of renewable projects across the country. We hope this policy conducive environment continues in order to add more energy from renewable sources.

Thanking you for your understanding, support and consideration.

With Sincere Regards

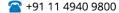


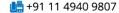
Samitla Subba VP- Policy and Communications

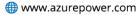
Azure Power India Private Limited

Regd. Office: 5th Floor, Southern Park, D-II, Saket Place, Saket, New Delhi - 110017

CIN: U40106DL2008PTC174774









Azure Power Comments on the Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022

S. No.	Clause	Main Regulation	Draft Clause	Proposed	Rationale
1		New Clause		No transmission charges and	We request Commission
				losses will be applicable for Solar	to incorporate MoP order
				PV power plants commissioned	dated 15 th January 2021
				under SECI Tender for	and subsequent orders on
				manufacturing linked capacity	Waiver of Inter-State
				scheme (RFS No	Transmission charges and
				SECI/C&P/RfS/2GW	losses on transmission of
				Manufacturing/P-3/R1/062019	electricity generated from
				dated 25.06.2019) for sale to	solar and wind sources of
				entities having RPO, irrespective	energy, which is inline with
				of whether this power is within	the transmission charges
				RPO or not.	and losses waiver provided
					to Solar PV manufacturing
					linked tender to
					incentivize generators to
					setup solar manufacturing
					capacity along with setting
					up solar plants.
2	Regulation	New Clause Under Supplementary		No transmission charges on (i)	We would request
	13 Clause (1)	Draft Regulation		REGS or RHGS based on wind or	commission to include
	(4)			solar sources or (ii) ESS charged	timelines for the
				with REGS or RHGS based on wind	transmission charges
				or solar sources shall be	' '
				applicable till PPA period i.e.	commissioned before 30 th

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	Connectivity granted to REGS projects or Standalone ESS project charged with REGS or RHGS will be applicable till 25 years or PPA tenure as per tender documents. Also, ESS should be charged with at least 51% of REGS or RHGS	align the waiver with the PPA timelines for RE project as well as for ESS. Without any timeline, this will create a lot of confusion and different interpretation while implementing the
	based on wind or solar sources annually to be considered as Renewable energy.	



3	Regulation	In case a generating station or	In case a generating station or unit(s)	In case a generating station or	We would like request
	13 Clause (8)	unit(s) thereof has achieved COD	thereof has achieved COD and the	unit(s) thereof has achieved COD	Commission to consider
		and the Associated Transmission	Associated Transmission System is	and the Associated Transmission	providing 90 days' time to
		System is	delayed, the concerned inter-State	System is getting delayed beyond	commission RE projects
		delayed, the concerned inter-	transmission licensee(s) shall make	its Scheduled Commissioning	post operationalization of
		State transmission licensee(s)	alternate arrangement at its own	Date as per the Regional Power	ATS. Since, RE projects
		shall make alternate arrangement	cost	Committee meeting, the	involves huge capital
		at its own cost	for despatch of power of the	generating station to be allowed	investment, halting/ non-
		for despatch of power of the	generating station or unit(s) thereof	to commission the project within	dispatch of power from
		generating station or unit(s)	in consultation with the Central	90 days from the final COD of the	these projects or just
		thereof in consultation with the	Transmission Utility:	Associated Transmission System.	providing the Yearly
		Central Transmission Utility:	Provided that till such alternate		Transmission Charges
		Provided that till such alternate	arrangement is made, the inter-State		against the pending ATS
		arrangement is made, the inter-	transmission licensee(s) shall pay to		will not justify the losses to
		State transmission licensee(s)	the		the RE generators and
		shall pay to the generating	generating station, the Yearly		provide sufficient
		station, the Yearly Transmission	Transmission Charge corresponding		safeguard measures.
		Charge corresponding to the	to the quantum of Long Term Access		Hence, we request to
		quantum of Long Term Access for	connectivity for the period for which		allow 90-day period to the
		the period for which the	the transmission system has got		generators to commission
		transmission system has got	delayed.		these projects so that
		delayed.			generators can align their
					investment and supply
					chain as per the
					operationalization of ATS.
4	Regulation	Generating stations drawing start-	Regional entity Generating stations	Generating stations drawing	We request Commission
	13 Clause	up power from ISTS shall pay	(a) drawing start-up power or (b)	start-up power from ISTS shall	to retain previous clause
	(10)	transmission charges at the rate	drawing power during shutdown after	pay transmission charges at the	under Sharing Regulation
		of	COD or (c) for REGS drawing power	rate of	2020 as apart from a)

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Transmission Deviation Rate for the State in which they are located:

Provided that the amount so received in a billing month, shall be reimbursed to the DICs in proportion to their share in the first bill in the following billing month.

during non-generation hours or (d) injecting infirm power, through ISTS, shall pay transmission charges for injection or drawl beyond its T-GNA, at the rate of Transmission Deviation Rate for the State in which they are located:

Provided that the amount so received in a billing month, shall be reimbursed to the DICs in proportion to their share in the first bill in the following billing month.

Transmission Deviation Rate for the State in which they are located:

Provided that the amount so received in a billing month, shall be reimbursed to the DICs in proportion to their share in the first bill in the following billing month.

drawing start-up power all the activities are part of post commissioning plant operations. Hence, considering a plant a drawee entity is not correct for its auxiliary power. We request commission to continue with the current practice of netting of energy.

+91 11 4940 9800