

The Secretary  
Central Electricity Regulatory Commission  
Chandralok Building  
Janpath  
New Delhi

Dear Sir,

On behalf of Indian Wind Turbine Manufacturers Association (IWTMA), we are giving below our **comments** on Draft CERC ISTS Charges (Regulation) Notification dated 11.06.2022.

1. **Regulation No : 11(1)**

**Proposed** : T-GNA Rate (in Rs./MW/block) shall be published for each billing month by the Implementing Agency which shall be calculated State-wise as under:

Transmission charges for GNA for entities located in the State, for the billing month, under first bill (in rupees) X 1.10 / (number of days in a month X 96 X GNA quantum, in MW, for all such entities located in the State considered for billing, for the corresponding billing period.)

**Comments / Suggestions:** The proposed T-GNA is higher than 10% of existing GNA, however as per the existing Regulations and practice the Short Term Charges are equivalent to the long term charges converted to paise/kWh. Since, T-GNA would be granted on existing margins, which is a substitute product for Short Term Access. **Request to consider the same practice and consider the same GNA charges instead of additional 10% for the T-GNA.**

2. **Regulation No: 12 (2)**

**Proposed** : Transmission Deviation Rate in Rs./MW, for a State or any other DIC located in the State, for a time block during a billing month shall be computed as under;

1.35 X (transmission charges for GNA of entities located in the State, under first bill for the billing month in Rs.) / (GNA quantum in MW of such entities located in the State, considered for billing, for the corresponding billing period X number of days in a month X 96)

**Comments / Suggestions:** In the proposed regulations, the Transmission deviation rate is on higher side in comparison of existing sharing Regulations of 2020, which is only 5% higher than transmission charges. It is to be noted

that in the SOR of Sharing Regulations of 2020, the commission has mentioned the reason behind 5% of higher transmission charges, i.e. “An entity which has not obtained adequate LTA or MTOA and uses the system over and above its LTA or MTOA, does not pay for such a system on a regular basis, while other DICs bear charges for such a system. Hence, charges for utilizing the system over and above LTA+MTOA have been kept marginally higher.” **In view of that request commission to consider the same reasoning and consider the same 5% higher charges instead of 35% for Transmission deviation.**

### 3. Regulation No: 13(1)

**Proposed** : Deleted the clause related to waiver of Transmission Charges & losses for Wind / Solar Projects.

**Comments / Suggestions:** In the proposed draft, the waiver of transmission charges for wind & solar has been removed, which means the discoms / Drawl entity have to pay transmission charges and landed cost would be on a higher side. To promote the RE Generation, there is a need to provide additional support to procure and waiver should be continued for Wind & Solar projects, which can be socialized as per existing practice.

It is to be noted that MoP has issued order dated 23rd [Nov 2021](#), wherein Wind, Hydro PSP and BESS projects commissioned upto 30-06-2025, provided for waiver of inter-state charges which shall be applicable for Solar or wind energy generation set up by any person/entity. The power generated from such sources can be self-consumed or sold to any entity either through competitive bidding, Power Exchange or through bilateral agreement for trading of electricity generated/ supplied from solar, wind & other sources in GTAM and GDAM upto 30-06-2025

The objective behind providing such waivers is to promote RE by all categories of generator & consumers, including C&I through Open Access. **In view of that the order of MoP, dt. 23rd Nov'2021 should be applied in Sharing Regulations to promote the RE Industry.**

### 4. Regulation No: 13(3)

**Proposed** : Where COD of a Connectivity grantee is delayed from start date of Connectivity in terms of GNA Regulations, and the Associated Transmission System has achieved COD, which is not earlier than such start date of Connectivity, the Connectivity grantee shall pay Yearly Transmission Charges for the Associated Transmission System corresponding to Connectivity capacity which have not achieved COD.

**Comments / Suggestion** : In the draft Regulation, Generator has to make payment due to mismatch of SCD & connectivity, however it may possible that mismatch is due to some Force Majeure events and got extended SCD. In this regard, MoP has already given direction on 15th [January 2021](#) to CERC under Section 107 of EA '2003 and mentioned to allow extension of LTA date, if generator grants extension in COD by competent authority.

**In view of the above, we request CERC to consider the above and allow extension of connectivity date, if generator is granted extension in COD by competent authority / bidding agency.**

With regards,

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