

February 15th, 2022

To
Shri. Sanoj Kumar Jha
 Secretary
 Central Electricity Regulatory Commission

Sub: IESA inputs/suggestions on draft CERC (Connectivity and General Network Access to the inter-State transmission System) Regulations, 2022

Respected Sir,

Greetings from India Energy Storage Alliance (IESA)!

This is in reference to your invitation for comments/suggestions on the Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021. On behalf of the Energy Storage and E-mobility industry, we take this opportunity to extend our warmest gratitude to Hon’ble Commission for finalising Ancillary Services Regulations and including Storage as part of GNA regulations.

IESA has been actively working in the space of energy storage, electric vehicle, renewable integration & microgrids, green hydrogen for the past 10+ years. We have been continuously working with various GOI Ministries, state utilities & national labs to prioritise the pilot energy storage deployment, manufacturing and R&D initiatives. We have 160+ energy storage and e-mobility, green hydrogen, microgrid players from India and abroad (those are focusing on India market) as our esteemed members

We would like to highlight following suggestions on the draft GNA regulations for your kind consideration

| S.No | Proposed | Suggestions & Rationale |
|------|--|---|
| 1 | Chapter 3, Section 5.4/ Explanatory Memorandum section 5.2 (iii) Standalone ESS with proposed maximum drawal from ISTS as 50 MW and proposed maximum injection to ISTS as 60 MW shall apply for Connectivity of 60 MW | This clause might get results into some limitations w.r.t application approval from discom/ additional charges to be born by applicant etc. Hence demarcation is required whether ESS is connected to front of the meter and providing any additional capacity or ESS is connected to behind the meter and supporting RE Project capacity. If ESS is provided with any additional services/multiple value stacks from single asset, then it can be required to apply for additional capacity |

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| 2 | <p>Chapter 1, Section 34</p> <p>Transmission charge rate for T-GNA, in Rs./MW/time block, for a State shall be published for each month by the Implementing Agency in terms of the Sharing Regulations</p> | <ul style="list-style-type: none"> All the renewable generators, solar/wind/hydro/ESS etc. are dependent on natural resources for the hour of operations. The availability is also limited to certain hours of the day. In such cases the applicability of Transmission Charges shall be proposed to be computed on a Rs./MW/time block basis instead of a Rs./MW/Month basis. <p>This will make RE power more affordable as and when the transmission charges waiver is withdrawn from the RE providers.</p> |
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We hope our submissions are considered positively in the best interest of the industry. IESA, on behalf of our Industry members, assure full support and cooperation to Hon'ble Commission towards development of the sector.

Yours Sincerely,



Debi Prasad Dash
Executive Director,
India Energy Storage Alliance