

Annexure-1: InWEA’s Comments/ Suggestions Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2022

Regulation	Proposed Draft Regulation	InWEA’s Comments/ Suggestions Regulations
5.8 (vii)	<p>In case of Renewable Power Park Developer, the following documents shall be submitted:</p> <p>(a) authorisation by the Central Government or the State Government, as applicable, to undertake infrastructural activities including arrangement for Connectivity on behalf of solar power generators or wind power generators; and</p> <p>(b) Registered Title Deed as a proof of Ownership or lease rights or land use rights for 50% of the land required for the capacity for which Connectivity is sought; and</p> <p>(c) Auditor’s certificate, certifying the release of at least 10% of the project cost including the land acquisition cost through equity.”</p>	<p>A Renewable Power Park Developer have to do development of land, take approvals for connectivity and building common infrastructure like roads and taking permits etc. therefore imposing a condition like 50% land and 10% of project investment will defeat the purpose of park development scheme.</p> <p>2. As per the present draft unless RPPD have reasonable land in control and connectivity in place or confirmation from PGCIL / CTU/STU that connectivity shall be granted; it can’t be qualified for bidding / self-consumption project.</p> <p>Considering the above, we would like to propose the modification in the proposed draft which is as follows: -</p> <p>(vii) In case of Renewable Power Park Developer <u>(Not single entity, it is Group of minimum installed capacity of 50 MW)</u>, the following documents shall be submitted:</p> <p>a) authorisation by the Central Government or the State Government, as applicable, to undertake infrastructural activities including arrangement for Connectivity on behalf of solar power generators or wind power generators; and</p> <p>b) <u>Proof for development of wind/solar parks with minimum capacity of 1000MW, and</u></p> <p>c) <u>Approved Detailed project report (DPR) by NIWE, and</u></p> <p>d) Registered Title Deed as a proof of Ownership or lease rights or land use rights for <u>at least 10%</u> of the</p>

		land required for the capacity for which Connectivity is sought;
5.8 (xi)	<p>In case of Applicants which are REGS (other than Hydro generating station) or ESS (excluding Pumped Storage Plant(PSP)) the following documents shall be submitted:</p> <p>(a) Letter of Award (LOA) by, or Power Purchase Agreement (PPA) entered into with, a Renewable Energy Implementing Agency or a distribution licensee or an authorized agency on behalf of distribution licensee consequent to tariff based competitive bidding, as the case may be: Provided that in case of Applicants being multi-located REGS, the details of locations and capacity at each location, duly certified by the Renewable Energy Implementing Agency or the distribution licensee, as the case may be, shall be submitted.</p> <p>Or</p> <p>(b)</p> <p>(i) Registered Title Deed as a proof of Ownership or lease rights or land use rights for 50% of the land required for the capacity for which Connectivity is sought; and</p> <p>(ii) Auditor’s certificate, certifying the release of at least 10% of the project cost including the land acquisition cost through equity.</p>	<p>Considering the comment for Clause vii of Regulation 5.8, we are submitting that the proposed clause xi of Regulation 5.8 needs to be amended as follows:</p> <p>In case of Applicants which are REGS (other than Hydro generating station) or ESS (excluding Pumped Storage Plant(PSP)) the following documents shall be submitted:</p> <p>(a) <u>Authorized Renewable Power Park Developer(RPPD)</u>, or Letter of Award (LOA) by, or Power Purchase Agreement (PPA) entered into with, a Renewable Energy Implementing Agency or a distribution licensee or an authorized agency on behalf of distribution licensee consequent to tariff based competitive bidding, as the case may be: Provided that in case of Applicants being multi-located REGS, the details of locations and capacity at each location, duly certified by the Renewable Energy Implementing Agency or the distribution licensee, as the case may be, shall be submitted.</p> <p>Or</p> <p>(b)</p> <p>(i) Registered Title Deed as a proof of Ownership or lease rights or land use rights for 50% of the land required for the capacity for which Connectivity is sought; and</p> <p>(ii) Auditor’s certificate, certifying the release of at least 10% of the project cost including the land acquisition cost through</p>

		equity.
9.3	<p>An applicant which is REGS (other than Hydro generating station), ESS (excluding PSP) or Renewable power park developer to which final grant of connectivity has been issued, shall have to achieve the financial closure for the capacity of such Connectivity, (a) within a period of 12 months from the date of issuance of final grant of connectivity, if the start date of Connectivity is within 2 years from date of issuance of final grant of connectivity or (b) a period equivalent to 50% time period between issue of final grant of Connectivity and start date of Connectivity, if the start date of Connectivity is more than 2 years from date of issuance of final grant of connectivity:</p>	<p>In the proposed draft amendment, the Hon'ble Commission has proposed to link the financial closure with two years' time. We are requesting you to link the financial closure with a time period of four years. The modified Regulations is as follows: -</p> <p>An applicant which is REGS (other than Hydro generating station), ESS (excluding PSP) or Renewable power park developer to which final grant of connectivity has been issued, shall have to achieve the financial closure for the capacity of such Connectivity, (a) within a period of 12 months from the date of issuance of final grant of connectivity, if the start date of Connectivity is within <u>four (4) years</u> from date of issuance of final grant of connectivity or (b) a period equivalent to 50% time period between issue of final grant of Connectivity and start date of Connectivity, if the start date of Connectivity is more <u>four (4) years</u> from date of issuance of final grant of connectivity:</p>