

Statkraft Markets Private Limited CIN: U51909DL2011PTC228692 Registered and Corporate office address : 401, 4th Floor, Salcon Rasvilas Building, Saket District Centre, New Delhi-110 017. Office: +91 11 6616 1200 Telefax: +91 11 6616 1299 www.statkraft.com, www.statkraft.in

## <u>Comments of Statkraft Markets Private Limited on Central Electricity</u> <u>Regulatory Commission (Connectivity and General Network Access to the</u> <u>inter-State Transmission System) (First Amendment) Regulations, 2023</u>

S.No.	Clause No & Details	Suggestion/Clarification	Rationale for
		Requested	Suggestion
1.	Clause 4.2	May be modified as below:	The intent of proposed
	New clause namely, clause	New clause namely, clause	amendment is to promote
	(xi) shall be added after	(xi) shall be added after	serious players and
	clause (x) of Regulation 5.8	clause (x) of Regulation 5.8 of	prevent blocking of
	of the Principal Regulations	the Principal Regulations as	connectivity. It may so
	as under:	under:	happen that while the
	"(xi) In case of Applicants	"(xi) In case of Applicants	DISCOM/Implementing
	which are REGS (other than	which are REGS (other than	Agency has issued LOA,
	Hydro generating station) or	Hydro generating station) or	there is a significant time
	ESS (excluding Pumped	ESS (excluding Pumped	gap before PPA is signed
	Storage Plant(PSP)) the	Storage Plant(PSP)) the	or PPA may not be
	following documents shall be	following documents shall be	signed at all. In such
	submitted:	submitted:	cases, connectivity will be
	(a) Letter of Award (LOA) by,	(a) <del>Letter of Award</del>	blocked. To avoid this
	or Power Purchase	<del>(LOA) by, or</del> Power	situation, only PPA shall
	Agreement (PPA) entered	Purchase	be considered while
	into with, a Renewable	Agreement (PPA)	applying for connectivity.
	Energy Implementing	entered into with, a	Further, the Electricity
	Agency or a distribution	Renewable Energy	Amendment Rules, 2022
	licensee or an authorized	Implementing	permit the Implementing
	agency on behalf of	Agency, or a	Agency to sell the power
	distribution licensee	distribution licensee	not supplied to DISCOMs
	consequent to tariff based	or an authorized	to open access
	competitive bidding, as the	agency on behalf of	consumers.
	case may	distribution licensee	Thus, as per proposed
	be:	consequent to tariff	amendment, projects
		based competitive	supplying power to open
		bidding, as the case	access consumers
		may	through Implementing
		be:	Agency need not put
		Provided further that PPA	upfront investment of
		signed with Implementing	10% of project cost, no



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		Agency shall be considered	land required upfront.
		only if the Implementing	This will dis-incentivize
		Agency has signed back to	merchant renewable
		back Power Sale	plants. Hence, the
		Agreement (PSA) with a	proposed amendment
		Distribution Licensee	
2.	Clause 12.1	It may be clarified that in case	
	A new clause, namely, (vi)	any intra-state generator	
	shall be added after the	wants to sell power through	
	clause (v) to the Regulation	power exchange or want to	
	17.1 of the Principal	sell power on bilateral basis to	
	Regulations as under:	a consumer in some other	
	"(vi) An injecting entity which	state, will it be required to take	
	is granted Connectivity to	GNA or T-GNA?	
	intra-State transmission		
	system and seeking GNA for		
	purpose of injection into		
	ISTS."		
3.	Clause 16.1	May be modified as below:	As per the rationale given
	A new Regulation 20.4 shall	A new Regulation 20.4 shall	in Clause 34 of the
	be added after Regulation	be added after Regulation	Explanatory
	20.3 of the Principal	20.3 of the Principal	Memorandum, the
	Regulations as under:	Regulations as under:	amendment is proposed
	"20.4 Entities covered under	"20.4 Entities covered under	to ensure that consumers
	clause (iii) of Regulation 17.1	clause <i>(ii) and</i> (iii) of	drawing power from RE
	of these regulations shall be	Regulation 17.1 of these	sources are not forced to
	eligible to apply for GNA to	regulations shall be eligible to	bear transmission
	draw power only from	apply for GNA to draw power	charges. The same
	renewable sources as	only from renewable sources	exemption shall also be
	identified at clause (2) of the	as identified at clause (2) of	given to drawing entities
	Regulation 13 of the Sharing	the Regulation 13 of the	connected to intra-state
	Regulations. Such GNA shall	Sharing Regulations. Such	transmission system.
	be called as GNARE for	GNA shall be called as $GNA_{RE}$	Currently, most of the
	purpose of calculation of	for purpose of calculation of	consumers taking power
	transmission charges in	transmission charges in	through open access are



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	accordance with the Sharing	accordance with the Sharing	connected to the intra-
	Regulations	Regulations	state transmission
			system. Such consumers
			shall also be permitted to
			take GNA <sub>RE</sub> or TGNA <sub>RE</sub> ,
			as the case may be
4.	Clause 24.6	It is requested that in case of	The delay may be for
	(1)	delay in COD, the connectivity	reasons out of control of
	(a) Connectivity shall be	may not be revoked in one go.	the project. Project
	revoked for the	developer. In case of delay,	developer will have made
	corresponding capacity, if the	the Developer may be asked	significant investments in
	Connectivity grantee fails to	to submit extra bank	the project and
	achieve COD either in full or	guarantee. This coupled with	revocation of connectivity
	in parts on or before,	Developer's obligation to pay	will lead to huge losses.
	(i)	transmission charges in case	
	(ii) six months after the	of delay in COD would	
	scheduled date of	prevent developers from	
	commercial operation as	undue delay in COD.	
	intimated at time of making		
	application for grant of		
	Connectivity, for cases		
	covered under clause (xi)(b)		
	of the Regulation 5.8		