



NTPC Submission on Draft (Connectivity and General Network Access to the inter-State Transmission System) (First Amendment) Regulations, 2023



Connectivity Application by Developer Not Having PPA/LoA

➤ **Amendment to Regulation 5.8 of the Principal Regulations provides that:**

New clause shall be added under Regulation 5.8 as follows:

➤ *In case of Applicants which are REGS or ESS following documents shall be submitted:*

LOA, or PPA entered into with, a Renewable Energy Implementing Agency or a distribution licensee as the case may be:

Or

- (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***
- (i) Auditor's certificate, certifying the release of at least 10% of the project cost including the land acquisition cost through equity.*

- Development of Renewable project primarily depends upon Land and Connectivity. Since the Cost of Land is significant for RE projects, connectivity grant becomes a pre-requisite for selecting particular land near to the substation with timely availability for overall optimization and feasibility of the project. Only after securing connectivity, one can invest on land and materials. So, it is better to provide some timeline (12 months) for land documents after granting connectivity.
- In case of ground-mounted/floating solar project, the land/waterbody requirement is around 5 acres/MW, whereas other RE projects like Wind/ESS requires significant less land area (i.e., ~0.5-1.0 Acres/MW). Further the transfer of ownership of such a large land shall take significant time for registration or lease compared to other RE sources-based project.
- Considering that Conn-BG1/2/3 are required to be submitted and Connectivity can also be revoked if financial closer is not achieved within stipulated time, **it is requested to relax land area requirement of solar project upto 10% of project area.**
- Further in line with existing Connectivity regulation-2009 clause which is already proven, the financial closure may be retained as alternative of 10% fund release document for connectivity application. This shall provide flexibility to applicant for making an application.

Therefore, the Clause may be modified as:

- In case of Applicants which are REGS or ESS the following documents shall be submitted: LOA, or PPA entered into with, a Renewable Energy Implementing Agency or a distribution licensee as the case may be:

Or

(i) Registered Title Deed as a proof of Ownership or lease rights or land use rights for:

10% of the land/waterbody required for the Solar capacity for which Connectivity is sought

or

50% of the land required for the Renewable capacity other than solar for which Connectivity is sought

and

(ii) Achievement of financial closure, (with copy of sanction letter) or

Auditor's certificate, certifying the release of at least 10% of the project cost including the land acquisition cost through equity.

Submission of Documents by Renewable Power Park Developer for Connectivity Application

➤ **Amendment to Regulation 5.8 of the Principal Regulations provides that:**

In case of Renewable Power Park Developer, the following documents shall be submitted:

- (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*
- (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*
- (c) Auditor's certificate, certifying the release of at least 10% of the project cost including the land acquisition cost through equity."*

➤ **Submission:**

- Development of solar projects under solar Park Model is based on institutional mechanism. Solar Park development schedule is fixed from date of in-principle approval by MNRE and approval may be revoked in case of non-adherence of timelines.
- In case of development of solar projects under Solar Park model approved by MNRE there are no such issues like "squatting"/blocking of ISTS bays. Hon'ble Commission vide order dt. 29th of September, 2017 in Petition No. 145/MP/2017 has pleased to mention that:

*"In case of Solar, most of the projects are coming in solar parks. **For solar parks, there are separate provisions for grant of connectivity and practically there is no issue of squatting**".*

- **Hence Registered Title Deed as a proof of Ownership or lease rights or land use rights for 50% of the land required and Auditor's certificate, certifying the release of at least 10% of the project cost may not be sought at the time of application and existing clause may be retained.**

Grant of Connectivity to a Generating Station

- **Amendment to Regulation 5.2 of the Principal Regulations provides that:**
- An ESS or a generating station having Connectivity for a particular installed capacity may allow another generating station not owned by it for having connectivity with ISTS.
- Further the existing Connectivity Grantee shall be responsible for compliance with the Grid Code and other regulations of the Central Commission for such additional generation capacity.
- **Submission:**
 - As the other entity shall not be a connectivity grantee and the existing grantee shall be responsible for the compliances of extant regulations with no onus on the other entity for such compliances, such arrangement may lead to disputes.
 - In order to avoid disputes in future, and to ensure the compliances of the regulations the other entity may also be considered as connectivity grantee and made responsible for compliance with the Grid Code and other regulations of the Central Commission.
 - Hence the clause may be modified as follows:
 - ***Notwithstanding anything contained in Regulation 5.1, a generating station or ESS, with prior approval of CTU, shall be eligible to add, within the quantum of Connectivity granted to it, additional generation capacity or ESS, owned by the generating station or the ESS or any other entity:***
Provided that the generating station or the ESS being the existing Connectivity Grantee and the other new entity shall be responsible for compliance with the Grid Code and other regulations of the Central Commission for such additional generation capacity including ESS as 'Lead ESS' or 'Lead generator' in terms of Regulation 2.1 (x)(ii) or Regulation 2.1 (y)(ii), as the case may be:

- **Transmission Deviation Charge liability for Generating Station having both ISTS & STU Connectivity:**
 - Methodology has been provided for the state only for the computation of the Transmission deviation charges having direct drawal from a Regional generating station which is connected to STU and ISTS or only STU system.
 - However, Methodology has not been provided for Generating Station having both ISTS & STU Connectivity:
 - As the power flow in the ISTS and STU lines may vary based on the system conditions i.e. the flow in ISTS lines may be more than the GNA of the Generator, hence the methodology for the computation of transmission deviation charges for Regional Generator which is connected to both STU and ISTS network (e.g. upcoming station of NTPC Talcher III) needs to be provided.
 - The suggestive clause is:
 - ***In case of a Regional Generator which is connected to both ISTS and STU the transmission deviation in a block shall be injection over and above the GNA of the generator and access taken from the State network.***



Migratory Birds at NTPC Dadri

Thank You



NTPC Ramagundam

Website: www.ntpc.co.in

Follow us on:  /ntpc1

 /ntpcltd1

 /ntpclimited

 /Company/ntpc

 /ntpclimited