



Ref No: ABREL/General/18122023

Dated 18th December 2023

To

Central Electricity Regulatory Commission,
3rd & 4th Floor, Chanderlok Building,
36, Janpath,
New Delhi, 110066

Sub: Suggestions & Comments Regarding Draft Central Electricity Regulatory Commission (Procedure, Terms and Conditions for grant of Transmission Licence and other related matters) Regulations, 2023.

Ref: Public Notice, L-1/270/2023/CERC dated 28-Nov-2023 seeking comments on draft Procedure, Terms and Conditions for grant of Transmission Licence and other related matters

Dear Sir,

Aditya Birla Renewables Limited ("ABReL") is renewable energy arm of Aditya Birla Group and has close to 50 utility scale Solar & Wind Power Plants spread over 10 states of India. ABReL currently has a secured portfolio of 3.3 GW across Solar, Wind, Battery Storage and Wind-Solar Hybrid / RTC projects at different stages of development & construction with ~1 GW assets under operation. We are currently developing close to 2 GW of ISTS connected Solar-Wind Hybrid & RTC projects for captive consumption.

We are pleased to enclose our comments and suggestions regarding the draft Central Electricity Regulatory Commission (Procedure, Terms and Conditions for grant of Transmission Licence and other related matters) Regulations, 2023. We hope that you will find the suggestions useful and would consider them appropriately while finalising a holistic procedure.

Thanking you,

Yours faithfully,

For Aditya Birla Renewables Limited

A handwritten signature in blue ink, appearing to read "Sandeep Sahay", is written over a light blue circular stamp.

Sandeep Sahay
VP – Business Development

Comments/Suggestion of Draft Central Electricity Regulatory Commission (Procedure, Terms and Conditions for grant of Transmission Licence and other related matters) Regulation 2023

Sr. No	Para No. of draft Procedure	Proposed draft	Comments on the draft Procedure	Justification for the Comments/Suggested draft procedure
1	4(c)	<p>a bulk consumer, with a load of 50 MW and above, who intends to draw electricity for the purpose of self-consumption by constructing a connecting transmission line from the ISTS sub-station to its premises.</p> <p>Explanation:- a bulk consumer shall also be eligible to get its connecting transmission line constructed, maintained and operated by a transmission licensee instead of seeking the transmission licence itself by amendment of the transmission licence of such licensee.</p>	<p>a bulk consumer, with a load of 50 MW and above, who intends to draw electricity for the purpose of self-consumption by constructing a connecting transmission line either by itself or through its subsidiary, fellow-subsidiary or group company, from the ISTS sub-station to its premises.</p> <p>Explanation:- a bulk consumer shall also be eligible to get its connecting transmission line constructed, maintained and operated by a transmission licensee instead of seeking the transmission licence itself by amendment of the transmission licence of such licensee.</p>	<p>(1) In order to meet the Govt of India's target of setting up 500 GW of renewable energy projects and for decarbonization, many industries are opting to get connected to ISTS substation. Many of these companies have set-up, within its group of companies, a renewable energy generating company to install and supply renewable power for the groups renewable energy requirement / decarbonization.</p> <p>(2) These RE generators are already setting up transmission line capacity for their generating plant requirement up to 400 kV (since license is not required for the generators). Such RE generators of the group company may be allowed to build, own and operate such dedicated transmission line for the group bulk consumer.</p>
2	4(c)	<p>a bulk consumer, with a load of 50 MW and above, who intends to draw electricity for the purpose of self-consumption by constructing a connecting transmission line from the ISTS sub-station to its premises.</p> <p>Explanation:- a bulk consumer shall also be eligible to get its connecting transmission line constructed, maintained and operated by a transmission licensee instead of seeking the transmission licence itself by amendment of the transmission licence of such licensee.</p>	<p>a bulk consumer, with a load of 50 MW and above, who intends to draw electricity for the purpose of self-consumption by constructing a connecting transmission line either by itself or through its subsidiary, fellow-subsidiary or group company, from the ISTS sub-station to its premises without the requirement of Transmission License.</p> <p>Explanation:- a bulk consumer shall also be eligible to get its connecting transmission line constructed, maintained and operated by a transmission licensee instead of seeking the transmission licence itself by amendment of the transmission licence of such licensee.</p>	<p>Bulk consumers similar to the power generators will set-up dedicated transmission line to the ISTS substation for connectivity and GNA. As power generators are not required to take transmission license, similarly bulk consumers should also be allowed to set-up transmission line without the requirement of taking Transmission License.</p>





3	5.6	As far as possible, within 7 days of receipt of the application, the Registry of the Commission shall convey defects, if any, noticed on preliminary scrutiny of the application for rectification and the defects conveyed shall be rectified by the applicant within a period of 7 days.	As far as possible, within 7 days of receipt of the application, the Registry of the Commission shall convey defects, if any, noticed on preliminary scrutiny of the application for rectification and the defects conveyed shall be rectified by the applicant within a period of 7 days from the date of receipt of defects from the Commission	This will provide sufficient time to Applicant to reply the quires of the Commission. Also, If Commission did not provide any defects within 7 days from receipt of application than application shall be deemed to correct in all aspect and it cannot be reject on the basis of defects.
4	Form -I	Application Form for Grant of Transmission licence / Amendment in the Transmission licence iv) Name, Designation & Address of the Contact Person		please allow at-least 2 person contact details to be filled