



AVAADA ENERGY PRIVATE LIMITED

(Formerly known as 'Giraj Renewables Private Limited')

Demerged Undertaking of Welspun Energy Private Limited

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Date: 03rd – December – 2024

To,
The Secretary,
Central Electricity Regulatory Commission (CERC),
6th - 8th Floor, World Trade Centre, Tower B,
Nauroji Nagar, New Delhi – 110029.

Subject: CERC Staff Paper on Stakeholder's suggestions for necessary modifications in the GNA Regulations

Respected Sir,

We appreciate the Hon'ble Commission's proactive approach in addressing critical issues under the GNA framework through the recent Staff Paper. Avaada Group, as India's leader in integrated green energy solutions, welcomes the opportunity to contribute to the ongoing discussions on the CERC Staff Paper. With expertise spanning solar module manufacturing, electrolyser production, green hydrogen and ammonia production, and renewable energy generation, AVAADA's mission aligns with advancing India's energy transition goals. The provision for dual connectivity for bulk consumers, such as large-scale green hydrogen and its derivatives production units, is critical to supporting the Government of India's National Hydrogen Mission.

In this regard, we wish to submit our comments on the following two crucial areas:

1. Dual Connectivity for Bulk Consumers - Comments on the Requirements for Dual Connectivity

The demand for dual connectivity has become imperative for bulk consumers, particularly those engaged in large-scale production of green hydrogen and its derivatives such as ammonia. These operations rely heavily on uninterrupted power supply for their continuous production processes.

Key Use Cases for Dual Connectivity - Ensuring Reliable Power Supply: Bulk consumers producing green hydrogen require consistent power to maintain uninterrupted operations.

- Dual connectivity enables drawing excess power from the host state DISCOM when ISTS-sourced power is insufficient.
- Utilizing banked power with the host DISCOM, which mandates physical interconnection due to current regulatory frameworks.
- Flexible Power Sourcing as Dual connectivity allows consumers to switch between ISTS and intra-state networks based on real-time availability and cost, ensuring the same load capacity operates seamlessly.

Potential Challenges for Dual Connectivity which we need to overcome



- **Bi-directional Power Flow:** Fluctuations in real-time load may critically overload interconnection points between ISTS and intra-state networks.
- **Unclear Regulatory Roles:** Any ambiguities in scheduling, metering, and energy accounting responsibilities amongst ISTS and STU constituents may cause inefficiencies.
- **Stranded Capacity:** Redundant network investments could lead to stranded assets unless effectively coordinated.

Proposed Resolutions for granting Dual Connectivity to the Bulk Consumers:

- **Use Rights of GNA-RE:** GNA-RE grantees should be allowed to pass their use rights to the host DISCOM or STU, provided power drawn via intra-state networks is exclusively RE-based. This ensures optimal network utilization GNA-RE without creating redundant capacity.
- **Liability for Charges:** Liability of payment of transmission charges (if any) against the GNA-RE shall however, be on the original GNA grantee only.
- **Metering and Scheduling Framework:** Extend the principles outlined in the Draft CERC ISTS Transmission Charges and Losses 4th Amendment 2024 for generators with dual connectivity to consumers, ensuring robust metering and energy accounting mechanisms.

2. Flexibility in Operationalization Timelines for GNA-RE

The nascent stage of India's green hydrogen sector necessitates greater flexibility in the operationalization timelines for GNA-RE to overcome challenges unique to this emerging domain.

Key Considerations - Challenges Faced:

1. Synchronization of timelines between RE generation projects and associated green hydrogen units, often hindered by delays in HVDC transmission systems or supply chain constraints for critical equipment like electrolyzers.
2. Commercial uncertainties, including securing long-term Bulk Ammonia Purchase Agreements (BAPAs) and project financing, which require additional development time.

Proposed Amendment in the GNA Regulations:

Avaada recommends that similar to RE Generators having flexibility to extend their connectivity timelines till award for the system elements (after in-principle grant of connectivity till final grant is issued); the operationalization timeline for GNA-RE granted to bulk consumers be extended to align with the commissioning timelines of their associated RE generation projects, with flexibility up to December 2031.





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Case in Point:

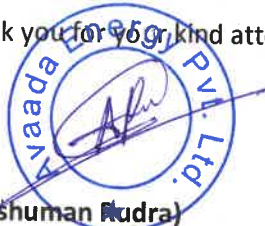
Whereas the Gopalpur 765/400 kV ISTS Substation has been awarded to M/s TATA Transmission (Transmission Service Provider – TSP) by the BPC – RECPDCL under TBCB Mechanism ERES-XXXIX Scheme, the targeted operationalization of the Transmission System is December 2027 and that beyond such timeline, GNA Transmission Charges will be made applicable to the GNA Grantees.

Given these challenges, we humbly request that the operationalization timelines for GNA, specifically for green hydrogen and ammonia / other derivatives of green hydrogen projects, be made more flexible in terms of allowing extension to the AVAADA Green Hydrogen Production unit upto December 2031. This alignment will enable developers like AVAADA and others to overcome technology, supply chain, and transmission constraints while ensuring timely implementation of critical projects.

The recommendations outlined above are pivotal to supporting India's leadership in green hydrogen production and its global competitiveness in clean energy technologies. Avaada Group humbly requests the Hon'ble Commission to consider incorporating provisions for dual connectivity for bulk consumers and flexibility in GNA operationalization timelines to facilitate the effective development of green hydrogen projects.

We remain committed to contributing to this important dialogue and are available for any further clarifications or discussions.

Thank you for your kind attention.



(Angshuman Rudra)

General Manager – BD & Strategy
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