Ref: JGEPL/CERC/BD/2024-25/01 **Date: 11-11-2024**

To,
The Secretary Central Electricity Regulatory Commission,
6th - 8th Floor, World Trade Centre, Tower B,
Nouroji Nagar, New Delhi – 110029

Subject: Comment/Suggestions on "Staff Paper on Stakeholder's suggestions for necessary modifications in the GNA Regulations".

Ref No: CERC's Public Notice having reference no. L-1/261/2021/CERC dated 9th October 2024.

Dear Sir,

We, Juniper Green Energy Private Limited (part of AT Capital Group), take this opportunity to introduce ourselves as an independent renewable energy power producer and operator of solar, wind and hybrid power projects with significant experience in conceptualizing, building, and developing renewable energy assets.

Juniper Green Energy group, headquartered at Delhi NCR, commenced operations in October 2018. The business has experienced rapid growth, and it presently has an operational portfolio of about 1.1 GW with an under-construction capacity of more than 3 GW and further development pipeline of over 6 GW capacity of solar, wind and hybrid projects. Juniper Green Energy Group is part of the AT Capital Group which has built and owned "Orange Renewable", a 1GW renewable energy platform in the past.

With reference to CERC's Public Notice under reference no. 1 above, we hereby submit our comment/suggestions regarding 'Staff Paper on Stakeholder's suggestions for necessary modifications in the GNA Regulations', enclosed at Annexure A.

This is for your kind consideration.

Thanking You,
For Juniper Green Energy Private Limited

Authorized Signatory
Enclosure: Annexure A

Juniper Green Energy Private Limited
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JUNIPER Green Energy

Annexure A

Clause No.	Description	Our Suggestion	Rationale/requests for clarification
Issue no. 7 8.3 (e)	It is proposed that the existing connectivity grantee, which was solar-based REGS, shall be mandated to share the dedicated grid infrastructure (terminal bay and the dedicated transmission line) with payment of charges for the dedicated transmission infrastructure (as mutually agreed or as determined by CERC in case of disagreement). **For solar hours, the new grantee shall be allowed to schedule power if the transmission system is available after scheduling power of existing solar REGS. The hours other than solar hours shall be treated as non-solar hours. It is clarified that the existing solar REGS can also seek GNA (non-solar)/connectivity at par with the new entity.**	It is proposed that the existing connectivity grantee, which was solar-based REGS, shall be mandated to share the dedicated grid infrastructure (terminal bay and the dedicated transmission line) with payment of one-time charges and annual O&M charges for the dedicated transmission infrastructure (as mutually agreed or as determined by CERC in case of disagreement within three months from grant of connectivity). For solar hours, the new grantee shall be allowed to schedule power if the transmission system is available after scheduling power of existing solar REGS provided that new grantee shall be responsible for grid compliance for the solar hour connectivity quantum as well as non-solar hour connectivity quantum. The hours other than solar hours shall be treated as non-solar hours. It is clarified that the existing solar REGS can also seek GNA (non-solar)/connectivity having priority over the ~~at par with~~ the new entity.	1. With the recent experience in the sharing of connectivity between two connectivity grantees, difficulties have been faced during the agreement on the terms and conditions for such sharing and the cost of such shared infrastructure. Discussions on such agreements have prolonged upto six months and sometimes negotiations have failed leading to withdrawal of connectivity by new applicant. **We suggest that CERC may kindly prescribe benchmark cost and long stop date for signing of sharing agreement.** 2. As per Grid Code, it is believed that existing solar REGS has complied with the technical requirements as per the studies for connectivity quantum. However, due to addition of new non-solar capacity for dispatch during non-solar hours, it is not clear how the grid compliance for the entire capacity (i.e. for solar hour connectivity quantum and non-solar hour connectivity quantum) would be taken care. It is suggested that new grantee shall be responsible for requirement of **additional reactive compensation, harmonic filters and installation of other equipments due to addition of such non-solar hour connectivity quantum.** 3. Since the proposal of non-solar hour connectivity quantum is envisaged in sharing with existing grantee, it is suggested that **existing grantee maybe given priority** in seeking connectivity during non-solar hours to mitigate the risk of disagreements in sharing between the two parties. 4. **Scheduling and Forecasting Issues:** During the solar hours, while the Solar REGS will be scheduling for injection, the Storage component will be scheduling for drawl at the same point of interconnection. Similarly, during non-solar hours, while solar REGS will draw some power for auxiliary consumption, storage component will schedule the injection at the same POI. **Clarity needs to be provided for the scheduling by these components and settlement mechanism for these cases.**

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Issue no. 7 8.3 (i)	Should existing solar generators (without storage) also be given the option to install storage for utilisation of connectivity/GNA during non-solar hours by submitting an application to CTUIL **within three months** and **installing within a period of 24 months**, failing which connectivity/GNA during non-solar hours shall be utilised to grant another connectivity through the same transmission system as 'non-solar hour connectivity' to another applicant, based on the other RE resources or Storage plant, for injection of power during non-solar hours?.	Existing solar generators (without storage) should be given the option to install storage for utilisation of connectivity/GNA during non-solar hours by submitting an application to CTUIL **within three months** and **installing within a period of 24 months** from the date of final grant of connectivity for non-solar hour connectivity (provided that GNA for solar generation capacity has been made effective), failing which connectivity/ GNA during non-solar hours shall be utilised to grant another connectivity through the same transmission system as 'non-solar hour connectivity' to another applicant, based on the other RE resources or Storage plant, for injection of power during non-solar hours.	1. Since the proposal of non-solar hour connectivity quantum is envisaged in sharing with existing grantee, it is suggested that existing grantee maybe given priority in seeking connectivity during non-solar hours to mitigate the risk of disagreements in sharing between the two parties. 2. **Provisions to deal with unforeseen delay in implementation of non-solar capacity (if any) should also be prescribed.** 3. With reference to non-solar hour connectivity, it is not clear whether **wind capacity can also be considered eligible** for grant of non-solar hour connectivity.
Issue no. 8 8.6	An applicant should take Connectivity for a quantum that it wishes to utilise. It is proposed that to ensure the optimal utilization of the transmission system, a minimum annual capacity utilization, i.e., 50%, for RHGS may be mandated, failing which the underutilized capacity of the Connectivity may be reduced, effective 1st October 2026. Alternatively, the quantum of Connectivity equal to the average of maximum injection in any time block of a day over the year (first year after the declaration of COD) may be allowed to be retained by the Connectivity grantee, and the balance quantum of the part of the Connectivity may be revoked (with corresponding Conn-BGs to be returned). Connectivity on such vacated capacity may be granted to other entities.	An applicant should take Connectivity for a quantum that it wishes to utilise. ~~It is proposed that to ensure the optimal utilization of the transmission system, a minimum annual capacity utilization, i.e., 50%, for RHGS may be mandated, failing which the underutilized capacity of the Connectivity may be reduced, effective 1st October 2026. Alternatively,~~ the quantum of Connectivity equal to the average of maximum injection in any time block of a day ~~over~~ during the preceding three years (~~first~~ three years after the declaration of COD) may be allowed to be retained by the Connectivity grantee, and the balance quantum of the part of the Connectivity may be revoked (with corresponding Conn-BGs to be returned). Connectivity on such vacated capacity may be granted to other entities.	1. Prescribing a minimum annual CUF may not be commercially viable for every RHGS grantee due to various requirements under the utility tenders/C&I PPAs (such as maximum CUF/ CUF range are prescribed by the off taker). However, utilization of the transmission capacity during the preceding three years may provide better clarity on the utilisation of transmission system by the connectivity grantee.