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To,

The Secretary
Central Electricity Regulatory Commission
6th, 7th & 8th Floors, Tower B, World Trade Centre,
Nauroji Nagar, New Delhi- 110029

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

Dear Sir,

We sincerely appreciate the Central Electricity Regulatory Commission's effort in promoting renewable energy in the country. We are grateful for your continued guidance, and assurance you have offered, in helping the renewable sector progress by enabling a robust and healthy environment to thrive in the country. We would like to thank you for the opportunity to raise our key concerns & suggestions on the "Staff Paper on Stakeholder's suggestions for necessary modifications in the GNA Regulations."

We have enclosed our comments / suggestions on the Staff paper for kind consideration of the Hon'ble Commission.

Yours sincerely,

For O2 Power Private Limited

Dharmendra Gupta

Authorized Signatory

Comments / Suggestions on Staff Paper on Stakeholder's suggestions for necessary modifications in the GNA Regulations.

Sr. No.	Proposed in the staff paper	Proposal/ suggestion by O2 Power
1.	**Issue No. 5: Utilisation of the Connectivity granted to a subsidiary by another subsidiary of the same Parent company.** **6.3** At present, there is no provision under the GNA Regulations that provides the utilisation of Connectivity among the subsidiaries of the same Parent company. The transfer of connectivity is possible after COD to the owner of REGS, which can be a subsidiary of the same parent or any third party. **6.4 Whether such utilisation of Connectivity among the different subsidiaries of the same Parent company should be allowed or not?**	It is a welcome step of Hon'ble Commission for consideration to utilisation of Connectivity among the different subsidiaries of the same Parent company. As we know the transfer of connectivity between subsidiaries is consistent with the objectives of the General Network Access (GNA) regulations. Enabling such transfers between subsidiaries under a shared parent entity serves several critical purposes. Firstly, it promotes more efficient use of connectivity resources, allowing companies to optimize network access without requiring additional, separate approvals for each entity within the corporate group. This ensures that the connectivity allocated to one subsidiary can be transferred to another where it may be more urgently needed, enhancing operational flexibility. Additionally, this practice helps meet market demands more effectively. Under the FDRE (Framework for Dispatch and Resource Eligibility) regime, the requirement for multiple injection points to ensure 90% generation availability is a significant challenge for bidders in the power sector. By allowing subsidiaries within the same corporate structure to transfer connectivity rights, companies can better position themselves to meet these stringent availability requirements. This flexibility becomes especially valuable when a

Sr. No.	Proposed in the staff paper	Proposal/ suggestion by O2 Power
		project needs to balance generation capacities across different locations to maintain the reliability targets outlined in bidding conditions. Since, the management control remains unchanged during such transfers, and there is no financial interest or motivation behind them. A subsidiary, as defined under the Companies Act 2013, must maintain at least a 51% shareholding by the parent company. This ensures that the parent company retains control, and the transfer of connectivity remains within the same corporate group. Given this structure, the utilization of connectivity in such cases should alleviate any concerns regarding the potential for connectivity being traded for financial gain or speculative purposes. Instead, it ensures that the connectivity is being optimized for operational efficiency within the same corporate umbrella. **In view of above, we propose that the utilization of connectivity among different subsidiaries of the same parent company should be permitted. Allowing such utilization would optimize network resources and enhance operational efficiency across the subsidiaries, while adhering to regulatory safeguards.**
2.	**Issue No. 6: Platform for providing NOC by the STU in a time-bound and a transparent manner.**	The consideration of a centralized online platform is a welcome step and is essential for streamlining the application process for the grant of No Objection Certificates (NOCs) by the State Transmission Utility (STU). Implementing such platform, which would support to get STU-NoC, is crucial for promoting

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	7.6 Considering the above, Comments and suggestions are sought from stakeholders, whether such a centralized online platform is required to be implemented for processing the application for grant of NOC by the STU in terms of availability of transmission capacity in the intra-State network?	transparency, reducing procedural delays, and improving overall efficiency for approval process. This digital approach would allow stakeholders to access real-time information and ensure fair and consistent handling of applications. The concerned STU should be required to provide its consent within a time-bound period of 15 days from the date of application. In cases where the STU does not respond within this timeframe, a deemed consent should be granted. This approach ensures that delays in the approval process are minimized, especially when the existing consumer is not increasing their current load or contract demand. This deemed consent would encourage STUs to act promptly, reducing bottlenecks and avoiding administrative delays that could hinder project execution. In view of the above, we request to Hon'ble Commission to implement following process to get STU-NoC; 1. Implement a centralized online platform for processing NOC applications by the STU, to promote transparency, reduce delays, and improve efficiency. 2. Mandate the STU to provide consent within 15 days from the date of application, with a deemed consent provision if no response is received within this timeframe, provided the consumer is not increasing their load or contract demand.

Sr. No.	Proposed in the staff paper	Proposal/ suggestion by O2 Power
3.	**Issue No. 7: Provision for grant of Solar hours Connectivity and Non-Solar hours Connectivity through the same Transmission system.** **h)** Considering the above, Comments and suggestions are sought from stakeholders on the abovementioned proposed model of "Solar-hour Connectivity" and "non-Solar hour Connectivity". **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?.	Proposal of Hon'ble Commission to introduce Solar Hour Connectivity and Non-Solar Hour Connectivity is an innovative and forward-thinking solution aimed at maximizing the utilization of the existing inter-state transmission system. This will allow more efficient use of available transmission capacity, particularly by spreading the load between solar and non-solar generation hours, which is expected to improve the overall stability and efficiency of the grid. However, it is strongly suggested that proposal should not be implemented for existing solar generators to to install storage for utilisation of connectivity/GNA during non-solar hours 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. The grant of Solar hours Connectivity and Non-Solar hours Connectivity through the same Transmission system in a time bound manner should be applicable only to new generators applying for fresh connectivity moving forward. The introduction of such a significant change should be reserved for future projects to ensure that it does not disrupt the financial and operational planning of existing generators. Existing solar generators have already made significant investments in their plants, evacuation systems, and related infrastructure based on the regulatory framework that was in place at the time of their project development. These investments were made with the expectation of using the available grid capacity under the existing terms of connectivity. Retrospectively imposing in a time bound manner on these projects could lead an operational challenge

Sr. No.	Proposed in the staff paper	Proposal/ suggestion by O2 Power
		for these generators, as they would need to upgrade or modify their systems to meet the new requirements. **Given these concerns, we recommend that the proposed requirement for Solar Hour and Non-Solar Hour Connectivity not be implemented in a time-bound manner (e.g., within 3 months) for existing projects. This will allow sufficient time for these projects to assess and adjust to the new framework without facing undue pressure or disruption to their operations.**
4.	**Issue No. 8: Provision for Minimum Transmission Capacity Utilisation for Hybrid ISTS Connectivity.** **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. **8.7** Considering the above, Comments and suggestions are sought from stakeholders on the above proposal whether the minimum annual	The tenders issued by REIAs/Discoms often specify a minimum CUF (Capacity Utilization Factor) that must be met by the Renewable Hybrid Generation Systems (RHGS). However, prescribing a minimum annual CUF through regulatory mandates may not be commercially viable for RHGS grantees. This is due to several factors, including the specific CUF requirements outlined in utility tenders and Corporate & Industrial (C&I) Power Purchase Agreements (PPAs), which often specify a range for the CUF (maximum and minimum) and the ratio of wind and solar components within the hybrid mix. This would allow for greater flexibility in the system design and operational conditions, ensuring that the RHGS projects can meet the unique needs of different contracts, while avoiding unrealistic or commercially unfeasible CUF targets imposed by regulations. Furthermore, this approach would also allow developers to better manage risks associated with hybrid systems that involve a mix of solar and wind and accommodate the variances in performance between the two technologies.

Sr. No.	Proposed in the staff paper	Proposal/ suggestion by O2 Power
	capacity utilization of the Connectivity by the RHGS should be mandated or not.	**In view of that we would like to recommend that the minimum CUF for RHGS to be defined contractually, not through regulations. This allows alignment with PPAs and utility tenders, offering flexibility to manage risks and ensuring the commercial viability of hybrid projects.**