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Ref. No: RPIL/CERC/2024-25/01

Date: 04.12.2024

To,

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

Subject: Revised Observations & Suggestions of RPIL on the ‘Staff Paper on Modifications in GNA Regulations’ issued on 09.10.2024

Reference: L-1/261/2021/CERC dt. 09/10/2024

Sir,

With reference to your letter no. L-1/261/2021/CERC dated 9th October 2024 and letter no. L-1/261/2021/CERC dated 11th November 2024 (re-notified for extension of last date of submission of comments) We, at Rays Power Infra Ltd., a prominent entity in the renewable energy EPC sector specializing in solar and wind parks as well as energy storage solutions, hereby submit our comments and suggestions on the aforementioned Staff Paper on Modifications in the GNA Regulations by Central Electricity Regulatory Commission published in October, 2024.

We remain grateful for your attention to our submission.

Please find enclosed our Comments and suggestions on the same enclosed as **Annexure-I & Annexure-II** (Pg. 2-3)

Thanking you,

Yours faithfully,

Sudhanshu Vishwakarma

Comments/Suggestions on Central Electricity Regulatory Commission (Staff Paper on Modifications in the GNA Regulations), 2024

Clarity Sought	Suggestions/Recommendations
<p>Priority of applicants & Payment of charges:</p> <ol style="list-style-type: none"> 1. We understand that under the new¹ proposed change via issue no 7, if an entity/ SPV has obtained connectivity at a particular substation for utilization of RE Power during solar hours, will it required to get grant of connectivity separately by same entity/ affiliates of the same parent’s company (REGS/ ESS (either the same or different) for getting the priority for utilizing the transmission system during non-solar hour? 2. For an entity that has already been granted connectivity and is seeking non-solar hour connectivity at the same point of injection, how should the Conn-BGs (Connectivity Bank Guarantees) be furnished? 3. The exact components of the payment of charges, financial obligations must be specified apparently in case of sharing a dedicated transmission system to avoid the regulatory conflicts. 	<ol style="list-style-type: none"> 1. “Any solar-based REGS that has obtained connectivity at a particular substation shall be allowed to apply for connectivity during non-solar hours within six months of achieving its Commercial Operation Date (COD), shall be eligible to get priority for utilization of Transmission system until SPV/ entity / affiliates surrendered to utilize during Non-Solar hour. 2. If the entity/ afflicts refuse to do so, the connectivity for non-solar hours will be granted to another entity based on their application to the nodal agency” with a provision of transferable obligation to New Entity as per Connectivity Contract agreement. 3. There should be a provision to share the CAPEX invested by Granted entity for Transmission lines and Bay.
<p>Connectivity agreement:</p> <p>(a) If another entity based on REGS/ESS is granted connectivity for non-solar hours at a point of injection where a solar-based REGS already has connectivity, how will the connectivity agreements be re-structured? Will there be regulatory provisions for signing a tri-partite agreement among CTUIL and the other connectivity grantees?</p>	
<p>Definition of solar and non-solar hours:</p> <p>Considering the diverse meteorological scenarios across India, the pattern of solar radiation varies significantly between regions, even within the same state. Therefore, it is essential to define solar hours with specific time blocks for each state or region. A universal definition for solar hours cannot be applied, as it would adversely impact entities in different regions when scheduling power.</p>	

New Clause proposed to be added/amended apart from the various issues discussed in the Staff Paper for Modifications in GNA Regulations (As amended from time to time):

• **Existing Regulation:**

Under the current GNA Regulations, applicants who have applied for connectivity as a Renewable Energy Generating Station (REGS) are not permitted to convert their application to a Renewable Power Park Developer (RPPD) at a later date.

Proposed Addition of Clause in the Existing Regulation:

“Any applicant who has applied for connectivity as a Renewable Energy Generating Station (REGS) with or without Energy Storage System (ESS) to the nodal agency may subsequently opt to convert its application to that of a Renewable Power Park Developer (RPPD) if the required authorization is received from the central or state government at a later date, subject to the consent of the nodal agency”.

Proposed Modification in the Existing Clause (vii) of Regulation 5.8 of GNA Regulations:

In case of Renewable Power Park Developer, the documents shall be submitted through any one of the following below;

- (a) Authorization 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;

OR

- (b) Registered Title Deed as proof of Ownership or lease rights or land use rights for 50% of the land required for the capacity for which Connectivity is sought:

Provided that for States where State Government issues Government Order for allotment of Land to the Nodal Agency identified for development of Renewable energy in the State, which in turn issues Advance Possession of land to the project developer, such Government Order allotting land to the Nodal Agency accompanied with Advance Possession letter issued in the name of Applicant of Connectivity, shall be considered as a valid document towards Land Use Rights subject to the condition that the said documents shall be submitted for at least 50% of the land required for the capacity for which Connectivity is sought.

OR

- (c) For a capacity up to 1000MW - Bank Guarantee of Rs. 10 lakh/ MW and for a capacity more than 1000MW - Bank Guarantee of Rs. 100 Crore plus Rs. 5 lakh/ MW for capacity over and above 1000MW, in lieu of ownership or lease rights or land use rights of land for 50% of the land required for the capacity for which Connectivity is sought subject to provisions of Regulations 11A and 11B of these regulations.

Suggestion: The requirement for authorization from the central or state government should be optional, along with the Land Route and Land-BG Route. It should not be mandatory for Renewable Power Park Developers (RPPD) seeking connectivity to the inter-state transmission system. Alternatively, this provision can be deleted or relaxed with the following options.