

Ref: AMSPL/CERC/2024-25/01**Date:** 10.07.2024

To,
The Secretary
Central Electricity Regulatory Commission
7th Floor, World Trade Centre, Tower-B, Naurojinagar
New Delhi

Subject: Comments on Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (First Amendment) Regulations, 2024

Reference: Draft Tamil Nadu Electricity Regulatory Commission (Indian Electricity Grid Code) (First Amendment) Regulations, 2024

Respected Sir,

This is with reference to Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (First Amendment) Regulations, 2024 issued by Hon'ble Commission for inviting objections/ comments from stakeholders/ general public.

Amplus Solar is Asia's leading distributed energy company providing low-carbon clean energy solutions to commercial and industrial customers by setting up on-site solar projects (rooftop and ground-mounted) and off-site solar farms. Amplus Solar has also diversified into new avenues such as battery storage, residential solar, and electric vehicle-based logistics solutions.

Amplus Solar owns and manages a portfolio of over 1 GW of distributed solar assets and serves 250+ renowned Indian and multinational firms like Yamaha, Cisco, Amazon, Walmart, Reckitt Benckiser, Schlumberger, Carlsberg, ABB, TVs, Schneider, Qualcomm, Halliburton, GE, Honda among others, tripling its customer base from 2017 to 2023.

Amplus Solar's operational plants are expected to cumulatively generate 22 billion units of electricity over their lifetime. The carbon dioxide abatement over the lifetime of these projects amounts to 21 million metric Tonnes and the environmental impact can also be equated to 24 million mature trees absorbing carbon dioxide for 40 years.

Amplus Solar is a member of the Petroleum Nasional Berhad (PETRONAS) group, Malaysia and is headquartered in Gurugram, India with regional offices in Bangalore, Mumbai, Pune, Bangkok, Dubai, and Kuala Lumpur. PETRONAS recently established Gentari Sdn Bhd (GENTARI) to independently pursue and deliver integrated sustainable energy solutions, and to capture opportunities in the energy transition. GENTARI offers lower carbon solutions through three initial core pillars – Renewable Energy, Hydrogen and

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Green Mobility, forming a portfolio of solutions cutting across the electron value chain to help customers achieve net zero emissions.

We hereby submit Comments on Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (First Amendment) Regulations, 2024 as **Annexure-I** for kind consideration of the Hon'ble Commission.

Thanking you



Vivek Ranjan

Email I'd – vivek.ranjan@amplussolar.com

For Amplus Energy Solutions Private Limited

ANNEXURE-I

Comments on Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (First Amendment) Regulations, 2024

S. No.	Regulation/ Clause No./ Table No.	Draft Regulation Title	Provisions in Draft Regulations	Comments/ Suggestions
1.	19(2)(c)	Amendment to Regulation 19 of the Principal Regulations	<p>(1) Sub-Clause (b) of Clause (2) of Regulation 19 of the Principal Regulations shall be substituted with sub-clauses (b) and (c) as follows:</p> <p>(b) Injection of infirm power shall not exceed one year from the date of first synchronization for generating stations other than REGS and ESS.</p> <p>(c) Injection of infirm power shall not exceed 45 days from the date of FTC approval for REGS and ESS.</p>	<p>With respect to sub-clause (c) of clause (2) of Regulation 19 of the CERC (Indian Electricity Grid Code) (First Amendment) Regulations, 2024 it is humbly submitted that according to Regulations 21 and clause 3 of the Regulations 22 of the CERC (Indian Electricity Grid Code) Regulations, 2023 the REGS shall have to ensure the following post first time synchronization:</p> <ol style="list-style-type: none"> The REGS must provide a Trial Run notice 7 days in advance and ensure readiness for the Trial Run so that the plant passes on the first attempt. If a repeat trial run is required, the REGS must again provide 7 days' advance notice. During the trial run, the REGS must record the output of the unit(s) and corroborate its performance with the temperature and solar irradiation recorded at the site, as well as the plant design parameters. This

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				<p>corroboration may require multiple iterations to complete.</p> <p>3. Additionally, as per Table 8 of the CERC (Indian Electricity Grid Code) Regulations, 2023, the REGS must perform various tests for power system elements, such as the Power Plant Controller Function Test, Frequency Response Test, and Frequency Droop Test, before a successful trial run can be achieved.</p> <p>Given these requirements, we understand that obtaining COD approvals is a stringent and time-consuming process. Therefore, it is requested that the Hon'ble Commission extend the timeline for the injection of infirm power from 45 days to 3 months from the date of First Time Energization and Integration for REGS and ESS.</p> <p>Furthermore, it is noted that the CERC (Indian Electricity Grid Code) Regulations, 2023, do not define "FTC". However, they do define "First Time Energization and Integration". To avoid ambiguity, it is requested that the Hon'ble Commission either define "FTC" or clarify whether it can be interpreted as "First Time Energization and Integration".</p>

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				<p>In view of the above, we request the Hon'ble Commission to kindly modify sub-clause (c) of clause (2) of Regulation 19 of the CERC (Indian Electricity Grid Code) (First Amendment) Regulations, 2024 as follows:</p> <p>“2. Amendment to Regulation 19 of the Principal Regulations:</p> <p>(1) Sub-Clause (b) of Clause (2) of Regulation 19 of the Principal Regulations shall be substituted with sub-clauses (b) and (c) as follows:</p> <p>(c) Injection of infirm power shall not exceed 3 months from the date of first-time energization and integration approval for REGS and ESS.”</p>
2.	19(3)	Amendment to Regulation 19 of the Principal Regulations	<p>(2) A Proviso shall be inserted in Clause (3) of Regulation 19 of the Principal Regulations as follows:</p> <p>Provided that for REGS and ESS, extension of period for injection of infirm power beyond the stipulated period may be allowed (a) for a period up to six months by respective RLDC on an application(s) made by such generating station or ESS to respective RLDC along with detailed reasons, at least 10 days in advance of the</p>	<p>With respect to a proviso to clause (3) of the Regulation 19 of the CERC (Indian Electricity Grid Code) (First Amendment) Regulations, 2024 it is humbly submitted that according to Regulations 21 and clause 3 of the Regulations 22 of the CERC (Indian Electricity Grid Code) Regulations, 2023 the REGS shall have to ensure the following post first time synchronization:</p>

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			<p>completion of the stipulated period, (b) for a period beyond six months by the Commission on an application(s) made by such generating station or ESS along with detailed reasons, at least 30 days in advance of the completion of the stipulated period.</p>	<ol style="list-style-type: none"> 1. The REGS must provide a Trial Run notice 7 days in advance and ensure readiness for the Trial Run so that the plant passes on the first attempt. If a repeat trial run is required, the REGS must again provide 7 days' advance notice. 2. During the trial run, the REGS must record the output of the unit(s) and corroborate its performance with the temperature and solar irradiation recorded at the site, as well as the plant design parameters. This corroboration may require multiple iterations to complete. 3. Additionally, as per Table 8 of the CERC (Indian Electricity Grid Code) Regulations, 2023, the REGS must perform various tests for power system elements, such as the Power Plant Controller Function Test, Frequency Response Test, and Frequency Droop Test, before a successful trial run can be achieved. <p>Given these requirements, we understand that obtaining COD approvals is a stringent and time-consuming process. Therefore, we request that the Hon'ble Commission extend the period allowed for the injection of infirm power beyond the stipulated period. Specifically, we propose that the respective RLDC allow</p>

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				<p>injections for up to one year instead of the current six months, and that the Commission allow injections for beyond one year instead of the current six months, based on applications made by the REGS or ESS.</p> <p>In view of the above, we request the Hon'ble Commission to kindly modify a proviso to clause (3) of the Regulation 19 of the CERC (Indian Electricity Grid Code) (First Amendment) Regulations, 2024 as depicted below:</p> <p>“</p> <p>(2) A Proviso shall be inserted in Clause (3) of Regulation 19 of the Principal Regulations as follows:</p> <p><i>Provided that for REGS and ESS, extension of period for injection of infirm power beyond the stipulated period may be allowed (a) for a period up to 1 year by respective RLDC on an application(s) made by such generating station or ESS to respective RLDC along with detailed reasons, at least 10 days in advance of the completion of the stipulated period, (b) for a period beyond 1 year by the Commission on an application(s) made by such generating station or</i></p>

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				<p><i>ESS along with detailed reasons, at least 30 days in advance of the completion of the stipulated period.”</i></p> <p>It is requested that the Hon'ble Commission include a provision requiring the RLDC to respond to requests from REGS and ESS for an extension of the period for injecting infirm power within 7 days of receiving such requests. If the RLDC rejects an extension request, it must provide detailed reasons for the rejection and allow 5 days for the respective REGS/ ESS to respond with further clarifications if necessary. During this period of communication and clarification from REGS/ ESS, the RLDC should continue to permit the injection of infirm power.</p>