

shilpa


From: "Ravi ShankarSinha" <Ravi.ShankarSinha@Adani.com>
To: "Harpreet Singh Pruthi" <secy@cercind.gov.in>, "Shilpa Agarwal" <shilpa@cercind.gov.in>
Cc: RE-Regulatory@adani.com, "Chintan Mankad" <Chintan.Mankad@adani.com>, "Vyom Shah" <Vyom.Shah@adani.com>
Sent: Saturday, March 9, 2024 12:59:01 PM
Subject: RE: AGEL's comments and suggestions on the proposed Draft 2nd amendment to GNA Regulations, 2024

AGEL_Additional comments on Draft GNA 2nd Amendment Regulations - 09.03.2024.pdf

98 KB

AGEL_Additional comments on Draft GNA 2nd Amendment Regulations - 09.03.2024.docx

37 KB

From : Mukesh Kumar <mukeshkr.cea@gov.in> Fri, Mar 08, 2024 04:37 PM
Subject : Fwd: AGEL's comments and suggestions on the proposed Draft 2nd amendment to GNA Regulations, 2024  9 attachments
To : uralsharma1995 <uralsharma1995@gmail.com>

From: "Shilpa Agarwal" <shilpa@cercind.gov.in>
To: "Mukesh Kumar" <mukeshkr.cea@gov.in>, "ramakant ece" <ramakant.ece@gmail.com>, "Awdhesh Kumar Yadav" <awdhesh@nic.in>
Sent: Friday, March 8, 2024 4:32:21 PM
Subject: Fwd: AGEL's comments and suggestions on the proposed Draft 2nd amendment to GNA Regulations, 2024

From: "Ravi ShankarSinha" <Ravi.ShankarSinha@Adani.com>
To: "Harpreet Singh Pruthi" <secy@cercind.gov.in>, "Shilpa Agarwal" <shilpa@cercind.gov.in>
Cc: RE-Regulatory@adani.com, "Chintan Mankad" <Chintan.Mankad@adani.com>, "Vyom Shah" <Vyom.Shah@adani.com>
Sent: Friday, March 8, 2024 3:31:38 PM
Subject: AGEL's comments and suggestions on the proposed Draft 2nd amendment to GNA Regulations, 2024

Dear Sir/Madam,

On behalf of Adani Green Energy Ltd (AGEL), comments and suggestions on the proposed Draft 2nd amendment to GNA Regulations, 2024 are being submitted herewith (as Annexure-I) for kind consideration please.

Additional comments and suggestions on draft CERC (Connectivity and GNA to ISTS) (Second Amendment) Regulations, 2024

Clause	Existing Provision	Proposed Provision	Justification
Clause (vii) of Regulation 5.8	(b) Registered Title Deed as a proof of Ownership or <u>lease rights or land use rights</u> for 50% of the land required for the capacity for which Connectivity is sought;	(b) Registered Title Deed as a proof of Ownership or <u>lease rights or sub-lease or land use rights</u> for 50% of the land required for the capacity for which Connectivity is sought;	As per the clauses (vii) and (xi) of Reg 5.8 as amended vide 1 st Amendment, in case of connectivity sought on the basis of land, renewable energy generating companies/ renewable power park developers are required to submit documents related to ownership of land such as 'lease rights' or 'land use rights' for 50% of the land required for the capacity for which connectivity is sought.
Clause (xi) of Regulation 5.8	(b) Registered Title Deed as a proof of Ownership or <u>lease rights or land use rights</u> for 50% of the land required for the capacity for which Connectivity is sought;	(b) Registered Title Deed as a proof of Ownership or <u>'lease rights' or 'sub-lease' or 'land use rights'</u> for 50% of the land required for the capacity for which Connectivity is sought;	<p>In this regard, we would like to submit that many times, taking over land/ ownership of land usually be in the form of 'sub-lease' of land i.e. leasing of land by an allottee to a sub-allottee where sub-lessor represents that under the aforesaid sub-lease, it has the right to construct and operate of power projects on the said land.</p> <p>It can be appreciated that the 'sub-lease' document is co-terminus with the lease deed agreement, which is also being registered with appropriate stamp duty as of lease agreement.</p> <p>Therefore, 'sub-lease agreement' is also one of the documents which represents the ownership of land in addition to 'lease' or 'right of use' documents wherein sub-lessor is the owner of the particular land granted by allottee of land for the period as specified under the sub-lease document.</p> <p>In view of the above, it is requested to add 'sub-lease' along with 'lease' or 'right of use' documents as a proof of ownership of land required for the capacity for which connectivity is sought.</p>

