




 **Comments on Draft GNA Amendment 2.xlsx**
11 KB

From : Shilpa Agarwal <shilpa@cercind.gov.in> Mon, Mar 11, 2024 11:27 AM
Subject : Fwd: Comments - Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Second Amendment)  3 attachments
To : Mukesh Kumar <mukeshkr.cea@gov.in>, ramakant ece <ramakant.ece@gmail.com>, Awdhesh Kumar Yadav <awdhesh@nic.in>

From: ansharma@ampenergyindia.com
To: "Harpreet Singh Pruthi" <secy@cercind.gov.in>, "Shilpa Agarwal" <shilpa@cercind.gov.in>
Sent: Monday, March 11, 2024 9:54:18 AM
Subject: Comments - Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Second Amendment)

Dear Sir/Madam,

Please find attached comments on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Second Amendment).



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| S.No | Clause no. | Existing Clause in Draft Notification dated 16.02.2024 | Comments |
|------|------------|---|---|
| 1 | 3.1 | The words "one week" before the words "of the receipt of application" shall be substituted with the words "Eighteen (18) days" in Regulation 3.5 of the Principal Regulations. | Existing one week time period for Application verification post application submission gives nodal agency ample time. Extending the time line of verification will in-turn lead to taking long time in application verification, correction, Agenda formulation, CMETS meeting and subsequently will delay in Grant of Connectivity. Hence, please refrain from such changes for broader industry benefits. |
| 2 | 8.1 (2) | Provided that in case of REGS (other than Hydro generating station) or ESS (excluding PSP) who have been granted Connectivity under sub-clause (a) of Clause (xi) of Regulation 5.8 or are subsequently covered under sub-clause (a) of Clause (xi) of Regulation 5.8, the scheduled date of Commercial operation for the purpose of Clause (2) of Regulation 11A shall be considered as SCOD, as extended by REIA or a distribution licensee or an authorized agency on behalf of distribution licensee from time to time, subject to the condition that any extension in the timeline to release 10% equity infusion due to extension in SCOD shall not be allowed more than 12 months from the original timeline as per initial SCOD | Please delete the below lines: <i>"subject to the condition that any extension in the timeline to release 10% equity infusion due to extension in SCOD shall not be allowed more than 12 months from the original timeline as per initial SCOD"</i> Once the SCOD are extended by REIA and there are delays in project due to delays beyond reasonable control of developer than Developer may not invest in project until there is clarity. Therefore kindly amend the clause. |
| 3 | 8.1.(3) | Provided that in case of REGS (other than Hydro generating station) or ESS (excluding PSP) who have been granted Connectivity under sub-clause (a) of Clause (xi) of Regulation 5.8 or are subsequently covered under sub-clause (a) of Clause (xi) of Regulation 5.8, the scheduled date of commercial operation for the purpose of Clause (3) of Regulation 11 A shall be considered as the SCOD, as extended by REIA or a distribution licensee or an authorized agency on behalf of distribution licensee from time to time, subject to the condition that any extension in the timeline to achieve the milestone of Financial Closure due to extension in SCOD shall not be allowed more than 12 months from the original timeline as per initial SCOD." | Please delete the below lines: <i>"subject to the condition that any extension in the timeline to achieve the milestone of Financial Closure due to extension in SCOD shall not be allowed more than 12 months from the original timeline as per initial SCOD."</i> Once the SCOD are extended by REIA and there are delays in project due to delays beyond reasonable control of developer than Developer may not invest in project until there is clarity. Therefore kindly amend the clause. |