



Ref. No: RA/II/002/23-24/215

Date: 18-03-2024

The Secretary
Central Electricity Regulatory Commission
3rd & 4th Floor, Chanderlok Building
36, Janpath Road,
New Delhi - 110 001

Subject: Request to share the VC link of the Public Hearing and Comments on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Second Amendment) Regulations, 2024

Reference: L-1/261/2021/CERC dt: 13-03-2024

Sir,

With reference to L-1/261/2021/CERC dt: 13-03-2024, we furnish our comments/suggestions on the above draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Second Amendment) Regulations, 2024 for your kind consideration. We shall be grateful if the Hon'ble Commission recognizes our concerns and makes necessary modifications.

We would like to inform you that, IPCL will attend the public hearing on 21.03.2024 starting from 10.30 AM in Online Video Conferencing mode. We shall be grateful if the Hon'ble Commission shall the Microsoft teams link of the Public Hearing with the following email id:

arkajyoti.bhattacharjee@indiapower.com

pramod.singh@indiapower.com

Yours faithfully,


(Arkajyoti Bhattacharjee)

Deputy Manager (Regulatory Affairs)

India Power Corporation Limited

CIN - L40105WB1919PLC003263

Registered Office : Plot No. X1 - 2 & 3, Block - EP, Sector - V, Salt Lake City, Kolkata - 700091

Ph : +91 33 6609 4300 / 08 / 09 / 10, Fax : +91 33 2357 2452

Central Office : Sanctoria, P.O. - Dishergarh, District - Burdwan, Pin - 713333 (W.B.)

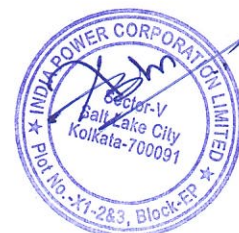
Ph : (0341) 2520021 / 2520028, E-mail : pr@indiapower.com, Web : www.indiapower.com

Comments on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Second Amendment) Regulations, 2024

The Hon'ble Central Electricity Regulatory Commission has issued Draft GNA Second Amendment Regulations, 2024 which largely deals with connectivity/general network access in respect of Renewable Energy Park Developer ("RE Park Developer"), Energy Storage System excluding pump storage ("ESS") and Renewable Energy Generating Station other than Hydro generating ("REGS").

India Power Corporation Limited (IPCL) is a distribution licensee operating in the state of West Bengal. Comments of IPCL on the draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Second Amendment) Regulations, 2024 is placed herein below for kind consideration of the Hon'ble Commission.

Sl. No	Regulation Reference	Draft Amendment	IPCL's Submission
1	Regulation 2.1 (ag-i)	"(ag-i) "Renewable Energy Implementing Agency" means and includes an entity designated by the Central Government or the State Government to act as Intermediary Procurer to select and buy power from Renewable energy generating station(s) and sell the same to one or more distribution licensees or any other entity in accordance with the Guidelines issued from time to time by the Ministry of Power, Government of India or the Ministry of New and Renewable Energy, Government of India or the State Government."	The definition may kindly be reworded as below, to provide more clarity: "(ag-i) "Renewable Energy Implementing Agency" means and includes an entity designated by the Central Government or the State Government to act as Intermediary Procurer to select and buy power from Renewable energy generating station(s) and sell the same to one or more distribution licensees or any other entity designated as a bid process agency/coordinator in accordance with the Guidelines issued from time to time by the Ministry of Power, Government of India or the Ministry of New and Renewable Energy, Government of India or the State Government."



2	Regulation 3.5	<p>“After scrutiny, the Nodal Agency shall intimate the deficiencies, if any, in the application for grant of Connectivity or grant of GNA, to the Applicant within Eighteen (18) days of the receipt of application, in order of date and time of receipt of application. The Applicant shall rectify the deficiency within one week thereafter, failing which the application shall be closed and 20% of the application fee shall be forfeited. Balance 80% of the application fee shall be refunded by the Nodal Agency to the Applicant within 15 days of closure of the application.”</p>	<p>The Draft Regulation proposed to increase the time limit within which Nodal agency is required to intimate the deficiency in Connectivity/GNA application from one week to 14 days. However, the time given to the Applicant to rectify the deficiencies has been kept same at one week. It is submitted that the in order to correct these deficiencies, Applicants may also be required to obtain data/records from various agencies/ departments internally or from various Govt departments. Therefore, the time limit within which these deficiencies need to be rectified may also be relaxed and the Applicant may also be allowed to correct such deficiencies within a time frame of 14 days.</p>
3	Regulation 5.1	<p>Modification of existing Regulation – Connectivity application aligned with LOA quantum and not installed Capacity</p>	<p>RE projects developed under Round-the-Clock (RTC) / Firm and Dispatchable Renewable Energy (FDRE) usually have substantial oversizing of installed capacity to meet the CUF norms of the procurer. For such projects, connectivity applications linked with installed capacity as against the LoA quantum would lead to significantly higher amounts of BG as well as land documents. Considering that the LoA quantum would be the relevant measure of connectivity, it is requested that the requirement conditions necessary be aligned with the LOA capacity and not with the installed capacity. This would provide a level playing field for all developers participating in the same. Therefore, suitable modifications may please be undertaken in the existing GNA regulations.</p>



4	Regulation 5.8 (vii) (c)	“(c) For a capacity up to 1000 MW - Bank Guarantee of Rs. 10 lakh/ MW and for a capacity more than 1000 MW - Bank Guarantee of Rs. 100 Crore plus Rs. 5 lakh/ MW for capacity over and above 1000 MW, 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.”	Regulation 5.8 (vii) (c) may suitably modified as under: For a capacity up to 1000 MW - Bank Guarantee of Rs. 5 lakh/ MW and for a capacity more than 1000 MW - Bank Guarantee of Rs. 50 Crore plus Rs. 5 lakh/ MW for capacity over and above 1000 MW, 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.
5	Regulation 5.8 (vii) (d)	“(d) Government Order issued by the concerned Government for allotment of the land along with possession documents for 100% of the land required for the capacity for which Connectivity is sought.”	Point (d) is to be deleted. The existing clause (b) and the proposed clause (d) are contradicting each other.
6	Regulation 5.8 (xi) (c)	“(c) For a capacity up to 1000 MW - 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.”	Regulation 5.8 (xi) (c) may suitably modified as under: For a capacity up to 1000 MW - Bank Guarantee of Rs. 5 lakh/ MW and for a capacity more than 1000 MW - Bank Guarantee of Rs. 50 Crore plus Rs. 5 lakh/ MW for capacity over and above 1000 MW, 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.
7	Regulation 5.8 (xi) (d)	“(d) Government Order issued by the concerned Government for allotment of the land along with possession documents for 100% of the land required for the capacity for which Connectivity is sought.”	Point (d) is to be deleted. The existing clause (b) and the proposed clause (d) are contradicting each other.

