

From: md apspcl <md.apspcl@gmail.com>
To: Harpreet Singh Pruthi <secy@cercind.gov.in>, Shilpa Agarwal <shilpa@cercind.gov.in>
Sent: Fri, 04 Oct 2024 17:20:54 +0530 (IST)
Subject: Comments on draft CERC (Connectivity and General Network Access to the inter-State Transmission System) (Third Amendment) Regulations, 2024

Respected Sir,

Thank you for giving opportunity to present our views on the draft CERC (Connectivity and General Network Access to the inter-State Transmission System) (Third Amendment) Regulations, 2024, the following are the issues brought to the kind notice of Hon'ble CERC for consideration.

1. The role of SNA has been clearly emphasized in the Standard Bidding Guidelines (SBG) notified by the Ministry of New and Renewable Energy (MNRE), a Ministry of Government of India responsible for development of RE projects across the Country. The SBG clearly defines the Role of SNA as part of Guidelines issued for *"Tariff Based Competitive Bidding Process for procurement of power from Grid Connected Wind Solar Hybrid Projects"*, mentioned as below:

Para - 21. Role of State Nodal Agencies:

The State Nodal Agencies appointed by respective State Governments will provide necessary support to facilitate the required approvals and sanctions in a time bound manner so as to achieve commissioning of the projects within the scheduled timeline. This may include facilitation in the following areas.

- *Coordination among various State and Central agencies for speedy implementation of projects**.*
- *Support during commissioning of projects*

2. Realizing the importance of bringing an orderly growth for the RE sector and the development of RE projects in a systematic fashion in the State of Andhra Pradesh, the Energy Department, Government of Andhra Pradesh has sent a letter to CTUIL, dated 23.01.2023 wherein copies were also marked to all the REIAs highlighting the role of SNA and the procedure to be followed in the bids by REIAs and CTUIL to accord connectivity approvals on the substations being developed by them in the State of Andhra Pradesh.

3. Subsequently, the Energy Department, Government of Andhra Pradesh has also given clear instructions to the SNA i.e., NREDCAP dated 23.03.2023 on the procedure to be adhered to clearly bringing out the process to be followed on the key parameters i.e., *Land and Power Evacuation* which are to be monitored closely to ensure that it doesn't lead to unnecessary issues at the project sites resulting in non-realization of the RE projects in the State. It is noteworthy to highlight the fact that even this letter

was copied to CTUIL and all the REIAs.

4. Meanwhile, since there were developments happening at CTUIL for approval of connectivity without considering the procedures of the SNA, NREDCAP has written a letter to Hon'ble CERC and CTUIL on 17.10.2023 by marking copies to all the REIAs once again and also to the representative associations for the renewable energy.

We wish to conclude that the role of the State and the State Nodal Agency should not be ignored for orderly growth of the RE Sector and hence we request the Hon'ble Commission to clearly bring out the role of SNA and adherence to the State policies and procedures into consideration without fail while according connectivity to developers and bring in a clear provision to enable the same.

Looking forward for your kind consideration in this regard.

Thanks & kind Regards,

M. Kamalakar Babu,

Officer on Special Duty,

A.P, Power Coordination committee(Renewable Energy Management & Coordination).