

Dated: September 17, 2024

Reference: Apraava/ Regulatory & Policy/Comments/2024/01

To,
Shri Harpreet Singh Purthi,
Secretary, Central Electricity Regulatory Commission,
8th Floor, Tower B, World Trade Centre,
Nauroji Nagar, New Delhi, 110029

Subject: Comments on “Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Third Amendment) Regulations, 2024.” (hereinafter referred to as “**Draft Regulations**”)

Respected Sir,

By way of an introduction, Apraava Energy Private Limited (Apraava) is a diversified power company in India, owning and operating multiple renewable energy project, transmission assets and Advanced Metering Infrastructure projects.

The Hon’ble Commission vide public notice (No. L-1/261/2021/CERC) dated 31.07.2024 invited comments / suggestions / Objections on the subject Draft Regulation. Our comments on the same has been enclosed as **Annexure I**.

We request the Hon’ble Commission to take our views on record.

Thanking you
Yours Sincerely,

Jogendra Behera
Head - Regulatory Affairs and Policy Advocacy

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We welcome the Hon'ble Commissions effort to notify the 3rd Amendment in GNA Regulations and thereby defining the "Complex of ISTS substation or cluster of ISTS substation" and bringing more clarity in the process of application of Connectivity and treatment of Bank Guarantees under different circumstance. With regards to the draft Regulations our Comments are as below:

Draft Regulation	Comment/Suggestion
<p>Sub-clause (c) to Clause (vii) and Subclause (c) to Clause (xi) of Regulation 5.8</p> <p>For a capacity up to 1000MW - 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:</p>	<p>Hon'ble commission may consider the below suggested Regulation:</p> <p>For a capacity up to 1000 MW - Bank Guarantee or Insurance Surety Bonds of Rs. 10 lakh/ MW and for a capacity more than 1000 MW - Bank Guarantee or Insurance Surety Bonds of Rs. 10 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:</p> <p>Rationale: CTUIL is currently under advance stage of discussion with MoP, Insurance companies and developers to implement the insurance surety bond. So, we request Hon'ble commission to consider the provision of Insurance Surety bonds also wherever BG is required to be submitted in the regulation. This will be a great ease for the developers.</p>
<p>Regulation 9.3</p> <p>The Applicants who have been issued an in-principle grant of Connectivity or final grant of Connectivity to ISTS, for the generation projects based on particular renewable energy source(s) (with or without ESS) may, for the same connectivity quantum, change to another renewable energy source(s) (with or without ESS) or ESS in part or full, by making an application to the Nodal Agency for approval for</p>	<p>Hon'ble commission may consider the below suggested Regulation:</p> <p>The Applicants who have been issued an in-principle grant of Connectivity or final grant of Connectivity to ISTS, for the generation projects based on particular renewable energy source(s) (with or without ESS) may, for the same connectivity quantum, change to another renewable energy source(s) (with or without ESS) or ESS in part or full, by making an application to the Nodal Agency for approval for such</p>



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<p>such change within 18 months from the in-principle grant of Connectivity. The Nodal Agency may carry out system studies, as required, and approve or reject the change in energy source within 30 days of application by the Applicant. On approval of such change of renewable source(s), the entity shall submit the technical data for changed renewable energy source(s), and CTU shall incorporate the necessary change in connectivity agreement, if already signed.</p>	<p>change within 18 months from the in-principal grant of Connectivity. The Nodal Agency may carry out system studies, as required, and approve or reject the change in energy source within 30 days of application by the Applicant. On approval of such change of renewable source(s), the entity shall submit the technical data for changed renewable energy source(s), and CTU shall incorporate the necessary change in connectivity agreement, if already signed.</p> <p>Provided that any difficulty arises upon approving such request, Nodal Agency shall inform applicant in writing. Applicant shall revert/rectify such difficulty within 7 working days. In case applicant fails to remove difficulties only then Nodal Agency may reject the application.</p> <p>Rationale: Rather than rejecting application, Nodal Agency needs to suggest if any additional requirement is there to approve the change in technology and the cost of additional requirement should be borne by the Applicant. If Applicant refuses to do so, only then Application may get rejected by the Nodal Agency.</p>
<p>Regulation 10.5 Where Connectivity is granted at a proposed ISTS sub-station, the Nodal Agency shall confirm the final coordinates within 2 months of award of contract for construction of such ISTS substation.</p>	<p>We request Hon'ble Commission to Retain the existing regulations which is as below:</p> <p>Where Connectivity is granted at a proposed ISTS sub-station, the Nodal Agency, shall confirm the final coordinates within 2 months after the receipt of the final grant such coordinates shall not be outside the radius of 5 km of the tentative coordinates already intimated.</p> <p>As per the existing regulations, the coordinates of the ISTS substation to which connectivity is granted will be within a 5km radius of the tentative coordinates already intimated. However, the proposed amendment does not offer any such guarantee</p>



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	<p>regarding the final location coordinates of the ISTS sub-station which is a risk on RE project developer as it may impact the length of dedicated transmission line. SO we request to retain the existing regulation.</p>
<p>New Regulation may be added in Regulation 11 (A) (4)</p>	<p>New Regulation 11(A)(4) <i>In case of part/full conversion under Clause (xi)(c) to Clause (xi)(a) of Regulation 5.8, proportionate Land BGs submitted to be returned within 15 days of such request for conversion.</i> Rationale: We request Hon'ble Commission to add new sub-clause related to refund of BG for conversion from land BG route to LoA route since the purpose of BG gets over after entering into LoA route.</p>