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Sent: Tuesday, September 17, 2024 11:17:33 AM
Subject: Draft CERC GNA Third amendment regulation 2024 || Comments EDF R India

Dear Sir,

Greeting from EDF Renewables India Private Limited

EDF Renewables India is a leading independent power producer, generating grid scale power. We develop, build, and operate renewable power plant and have a decade of experience in India. Our operational portfolio mainly includes wind power projects, and pipeline includes hybrid as well as Battery storage solutions. Currently the company is into utility scale projects for state and central off-takers and C-PPAs.

At the outset, we extend our gratitude to CERC effort in promoting renewable energy landscape in the country. We would like to thank you for the opportunity to raise our concerns and suggestions on Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Third Amendment) Regulations, 2024.

In this regard, please find enclosed our comments/suggestions on the Draft Regulation. Request to consider our comments on the draft regulation while finalizing the same.



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Comments / Suggestions on Draft CERC (GNA Third amendment) Regulations, 2024

Sr no	Clause as per CERC Draft GNA Third amendment	EDF R Proposed clause	Rationale
1.	Additional clause	Application on shared transmission system	<p>In the proposed amendment, Hon'ble commission has discussed about Sharing of transmission system.</p> <p>In case of grant of partial capacity on any bay, CTU shall offer the balance capacity to future / subsequent applicants. In case an applicant agrees to share the bay and the transmission system with the original grantee, CTU shall specify the responsibility for constructing the Transmission Line to either of the parties sharing such bay considering the Date of Connectivity requested by each of them. Moreover, the grantee assigned the responsibility for construction of the transmission line shall provide an activity wise time schedule for construction of the transmission line - Route Survey, Section 68 approval, Award of contract for transmission line, COD, etc. Such grantee shall submit the status of the progress in terms of these elements in each JCC. In case CTU observes that the construction of transmission line is delayed,</p>

			<p>it can entrust the responsibility of construction line to another applicant.</p> <p>CERC / CTU may mandate a specific format of transmission line sharing agreement, which needs to be signed within one month of the Consultation Meeting in which such sharing is agreed. This should be irrespective of any commercial issues between the parties. Responsibility of getting this agreement signed should be of the first party (party granted connectivity first). In case the parties do not sign the agreement, both parties would lose the right to the connectivity. The status of such connectivity's granted on sharing basis would be reviewed in the subsequent Consultation Committee meeting.</p> <p>We request Hon'ble commission to kindly incorporate the same.</p>
2.	<p>14.1.A new Regulation 9.3 shall be inserted below Regulation 9.2 of the Principal Regulations as under:</p> <p>"9.3 The Applicants who have been issued an in-principle grant of Connectivity or final grant of Connectivity to ISTS, for the</p>	<p>"9.3 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</p>	<p>In the proposed amendment, Hon'ble commission has inserted a new clause where the applicants who have been issued in-principle or final grant of connectivity can change RE source by making an application to the nodal agency for approval for such change within 18 months from in-principle grant of connectivity. The nodal agency will</p>

<p>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 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>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 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>List of criteria for rejection of change in RE source is detailed out in the annexure.</p>	<p>then carry out system studies and may accept or reject the change in RE source.</p> <p>We request Hon’ble commission to specifically detail out list of criteria based on which CTU can reject the request of change the RE source, so that application submitted will be correct and without any ambiguity.</p>
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