



सोलर एनर्जी कॉर्पोरेशन ऑफ इंडिया लिमिटेड  
(भारत सरकार का उपक्रम)

**Solar Energy Corporation of India Ltd.**

(A Government of India Enterprise)

स्वच्छ भारत - स्वच्छ ऊर्जा



Ref:SECI/CP-19/16/2024-CP/67140

Date: 17.09.2024

Central Electricity Regulatory Commission  
6th, 7th & 8th Floors, Tower B,  
World Trade Centre,  
Nauroji Nagar, New Delhi-11002

Ref: Public Notice No. L-1/261/2021/CERC dated 30th August 2024 of the Honourable CERC


**Sub: Comments/suggestions on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Third Amendment) Regulations, 2024.**

Sir/ Ma'am,

With reference to Public Notice No. L-1/261/2021/CERC dated 30th August 2024 of the Honourable CERC, wherein comments/suggestions/objections were solicited from the stakeholders on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Third Amendment) Regulations, 2024, please find enclosed comments/suggestions from Solar Energy Corporation of India Limited in **Annexure A**.

Thanking you,

Yours faithfully,

  
17/09/2024  
अजय सिन्हा

अपर महाप्रबंधक(अनुबंध और खरीद)

Encl.: As above

पंजीकृत कार्यालय : 6 वी मंजिल, प्लेट-बी, एनबीसीसी कार्यालय ब्लॉक टावर-2, Regd. Office : 6th Floor, Plate-B, NBCC Office Block Tower-2,  
पूर्वी किदवई नगर, नई दिल्ली -110023 East Kidwai Nagar, New Delhi-110023

दूरभाष / Phone: (011) 24666200, ई-मेल / Email: corporate@seci.co.in, वेबसाइट / Website: www.seci.co.in

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सीआईएन/CIN : U40106DL2011GOI225263

**Draft Connectivity and General Network Access to the Inter-State Transmission System (Third Amendment) Regulations, 2024.**

Sl. No.	Clause in Draft amendment	Proposed amendment - SECI	Justification
1.	<p><b>5.8 xi</b> In case of Applicants which are REGS (other than Hydro generating station) or ESS (excluding Pumped Storage Plant (PSP)) the following documents shall be submitted:                      (a) Letter of Award (LOA) by, or Power Purchase Agreement (PPA) entered into with, a Renewable Energy Agency or a distribution licensee or an authorized agency on behalf of distribution licensee, LOA issued by a Central Government approved third party which is acting as an authorized representative of a generating station other than REGS replacing its scheduled generation by power supplied from REGS, consequent to tariff based competitive bidding, as the case may be:                      Provided that:                      (i) In case of REGS other than RHGS and RHGS located in a single place, for an application based on such LOA or PPA, an applicant shall be eligible to apply for</p>	<p><b>5.8 xi</b> In case of Applicants which are REGS (other than Hydro generating station) or ESS (excluding Pumped Storage Plant (PSP)) the following documents shall be submitted:                      (a) Letter of Award (LOA) by, or Power Purchase Agreement (PPA) entered into with, a Renewable Energy Implementing Agency or a distribution licensee or an authorized agency on behalf of distribution licensee, LOA issued by a Central Government approved third party which is acting as an authorized representative of a generating station other than REGS replacing its scheduled generation by power supplied from REGS, consequent to tariff based competitive bidding, as the case may be:                      Provided that:                      (i) In case of REGS other than RHGS, for an application based on such LOA or PPA, an applicant shall be eligible to</p>	<p>REGS includes RE Generating stations that may be co-located/ multi-located. Therefore, any distinction between co-located and multi-located REGS for the purpose of grant of connectivity is infructuous.                      SECI's submission is limited to allowing grant of connectivity to such REGS up to the "installed capacity" as required under the Project to achieve the desired delivery profile (RTC/FDRE/Demand Following/Assured Peak etc.) and identified as such in the LOA.                      To prevent indiscriminate oversizing of RE Projects under such LOAs, SECI's tenders already provide for seeking Bank Guarantees commensurate to the installed capacity proposed by the Developer.                      The proposed amendments as per the Draft received creates an unnecessary uncertainty for the success of bidders under these tenders.</p>

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<p>Connectivity up to the installed capacity provided in the LOA or PPA. The connectivity under clause (a) of this Regulation shall be limited to the LOA or PPA quantum. For balance capacity, if any, the applicant shall be eligible to seek additional Connectivity based on sub-clauses (b) or (c) of this Clause.”</p>	<p><i>apply for Connectivity up to the installed capacity provided in the LOA or PPA. The installed capacity as indicated in the LOA or PPA may be more than or equal to the Awarded Capacity/Contracted Capacity as indicated in the LOA or PPA.</i></p>	<p>The quantum of requirement of connectivity for such projects are based on design configurations proposed by the Developer to fulfil the PPA obligations. Keeping connectivity for part of the installed capacity linked to LOA and part to Land/BG (under Clause (b) and (c)), may result in the developer not getting the requisite connectivity in the desired locations/quantum as there will be a time lag between the submission of application against LOA and Land/BG route. This may result in to non-grant of connectivity to the capacity required by the Applicant, thereby putting the development of project under risk. Thus, the proposed amendment in the draft regulations add to risk factors of such projects, thereby increasing the possibility of such risks being passed on through higher tariffs. The changes proposed by SECI addresses this uncertainty.</p>
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*26/5/20*

2.	<p><b>Amendment to Regulation 11A of the Principle Regulations:</b></p> <p><b>20.1</b> Clause (4) of Regulation 11A of the Principal Regulations shall be substituted as Clauses (4) and Clause (5) as under:</p> <p>.....</p> <p>(e) The Applicant shall not be eligible to seek another Connectivity using the same land documents based on which the Connectivity was sought under Clause (xi)(b) of the Regulation 5.8 and has been converted to Clause (xi)(a) of the Regulation 5.8."</p>	<p><i>This provision i.e. Clause 4(e) may be deleted</i></p>	<p>Connectivity obtained under Clause Regulation 5.8, xi (b) is indicative of pro-active/advance action by the RE Developer. Once RE Developer gets such connectivity converted to xi (a) under Regulation 5.8, there are chances that the same land may not be utilised (partly or fully). Therefore, discretion to seek another connectivity under xi(b), against same land should rest with the RE Developer. RE Developers seeking connectivity through land route and getting converted into LOA route is one of the pro-active initiation of RE Developer to speed up and timely development of RE and to support MNRE, GoI initiative of 500 GW RE capacity by 2030</p>
3.	<p>The following proviso shall be added to Regulation 5.5 of the Principal Regulations.</p> <p>"Provided that Renewable Power Park Developer which is authorized for a quantum of more than 500 MW, shall be eligible to apply for a grant of Connectivity in phases where in the first phase the application for Connectivity shall not be less than 500 MW, and the application for balance authorized</p>	<p>The following proviso shall be added to Regulation 5.5 of the Principal Regulations.</p> <p>"Provided that Renewable Power Park Developer which is authorized for a quantum of more than 500 MW, shall be eligible to apply for a grant of Connectivity in phases where in the first phase the application for Connectivity shall not be less than 500 MW, and the application for balance</p>	<p>This will facilitate expeditious development of RE Projects.</p>

*20/11/20*



	<p>quantum shall be in phases, subject to a minimum quantum of 50 MW in each phase.”</p>	<p>authorized quantum shall be in phases, subject to a minimum quantum of 50 MW in each phase.”</p> <p><i>In the event RE Park Developer is issued LOA or enters into PPA after the grant of connectivity, shall be eligible to seek conversion of its connectivity under Clause xi(a) of Regulation 5.8.</i></p>
<p>4.</p>	<p>“11.C.Reallocation of the terminal bay(s) falling vacant due to the surrender or revocation of the Connectivity granted to another entity (1) For optimal utilization of the transmission system, the Nodal Agency, with the consent of the concerned Connectivity grantee(s), may reallocate the Connectivity granted at an ISTS sub-station to another ISTS sub-station (in the Complex of ISTS substations) where any terminal bay has fallen vacant due to surrender or revocation of the Connectivity granted to another entity. The Nodal agency shall do such reallocation in the following manner: a. Information relating to any bay falling vacant at any particular substation due to surrender or revocation shall be given publicity on the CTU’s website and the status updated on a weekly basis with</p>	<p>“11.C.Reallocation of the terminal bay(s) falling vacant due to the surrender or revocation of the Connectivity granted to another entity (1) For optimal utilization of the transmission system, the Nodal Agency, with the consent of the concerned Connectivity grantee(s), may reallocate the Connectivity granted at an ISTS sub-station to another ISTS sub-station (in the Complex of ISTS substations) where any terminal bay has fallen vacant due to surrender or revocation of the Connectivity granted to another entity. The Nodal agency shall do such reallocation in the following manner: a. Information relating to any bay falling vacant at any particular substation due to surrender or revocation shall be given publicity on the CTU’s website and the status updated on a weekly basis with</p>
		<p>Updated information on available vacancy is considered important. Weekly Report, including NIL update Report shall offer assurance on information being updated.</p>

*3/2/24*

the date and time when the document was updated.  
....

the date and time when the document was updated.  
*In case of no vacancy in a week due to surrender or revocation of the Connectivity granted to an entity, NIL Report for that week shall be uploaded.*

*2022*