

Date: 11-11-2024

The Secretary
Central Electricity Regulatory Commission
6th, 7th & 8th Floors, Tower B, World Trade Centre,
Nauroji Nagar, New Delhi- 110029

Sub: Submission of comments and suggestions on the proposed Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (Fourth Amendment) Regulations, 2024.

Ref: Draft notification no. L-1/250/2019/CERC Dated: 09.10.2024

Dear Sir,

This has reference to the proposed Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (Fourth Amendment) Regulations, 2024 published for stakeholder consultation vide above referred notification no. L-1/250/2019/CERC Dated: 09.10.2024.

On behalf of Adani Green Energy Ltd, our comments and suggestions on the aforesaid draft are as under:

Clause	Existing Provision	Proposed Suggestion	AGEL Comments
13.2.b	“(b) Battery ESS which has declared commercial operation on or before 30.6.2025 shall be eligible for a waiver of transmission charges for a period of 12 years from the date of COD of such ESS subject to conditions as per sub-clause (c) of this Clause.”	“(b) Battery ESS which has declared commercial operation on or before 30.6.2030 shall be eligible for a waiver of transmission charges for a period of 12 years from the date of COD of such ESS subject to conditions as per sub-clause (c) of this Clause.” Provided that the BESS if being charged from the REGS or RHGS commissioned as per timeline mentioned in sub clause (f) (i) of this clause, shall also be eligible for a waiver of transmission charges, while discharging, in line with this regulation	A. Extension of waiver up to 30.06.2030: 1) Extension of waiver to ESS commissioned till 2030 will provide necessary impetus for rapid new capacity addition as witness in case of Solar and wind, which have been extended waiver from 2016 onwards. 2) ESS is at a very nascent stage and needs all the policy and regulatory support for increasing capacity as it provides numerous benefits. 1. Grid security and ancillary service 2. It supports optimum utilization of existing infrastructure 3. ESS generally does not require expenditure on expansion of transmission infrastructure and exiting system can be utilized for capacity addition.

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Clause	Existing Provision	Proposed Suggestion	AGEL Comments
			<p>B. Extension of waiver while Discharging:</p> <p>1) It is expected that operational renewable energy capacity including Solar, Wind and Hybrid will reach 170 GW by 30.06.2025, at the same time most of the Energy Storage projects will be commissioned only after 30.06.2025.</p> <p>2) The current method for computation of waiver of transmission charges is mainly based on the source from where the energy is scheduled for consumption.</p> <p>This computation methodology may lead to levy of transmission charges also on the energy scheduled from ESS even if it has charged with the energy procured from REGS or RHGS plant commissioned before 30.06.2025.</p> <p>This will discourage and deter the developers from adding ESS associated with the RE plants commissioned prior to 30.06.2025.</p> <p>3) The Hon'ble Commission should provide the necessary regulatory clarity to encourage developers to integrate Energy Storage Systems (ESS) into Renewable Energy Generation Systems (REGS) and Renewable Hybrid Generation Systems (RHGS) plants commissioned prior to June 30, 2025.</p>

Clause	Existing Provision	Proposed Suggestion	AGEL Comments
			<p>4) The power schedule from these Battery Energy Storage Systems (BESS) if charges itself from the RHGS and REGS commissioned prior to 30 June 2025, should be treated at par with solar, wind, or wind-solar hybrid plants as far as waiver of transmission charges are concerned and similar incentives as available to those solar, wind, or wind-solar hybrid plants must be extended to these ESS.</p> <p>5) This will incentivize developers to add new ESS capacity to their existing solar or hybrid plants, ultimately benefiting grid operators in managing the variability of renewable energy generation. This approach will also minimize the need for new transmission infrastructure</p>

Aforesaid comments and suggestions are submitted before Hon'ble CERC for kind consideration while finalizing the 4th amendment to the said Regulation please.

Thank you,

Yours faithfully,

For & Behalf of Adani Green Energy Limited



Ravi Sinha
Sr. Manager- Regulatory Affairs