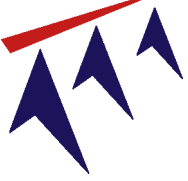


CONTINUUM



**CONTINUUM GREEN ENERGY PRIVATE LIMITED**  
(Formerly known as *Continuum Wind Energy (India) Private Limited*)

Date: 11.11.2024

To  
The Secretary,  
Central Electricity Regulatory Commission,  
7th floor, World Trade Centre, Nauroji Nagar  
New Delhi – 110029

Dear Sir/Madam,

Sub: Comments on Draft Central Electricity Regulatory Commission (Sharing of Inter-state Transmission charges and losses) (Fourth Amendment) Regulations,2024.

We are thankful to the Hon'ble Central Electricity Regulatory Commission for providing an opportunity for us to share our Comments on Draft Central Electricity Regulatory Commission (Sharing of Inter-state Transmission charges and losses) (Fourth Amendment) Regulations,2024. (Draft Notification No. L-1/250/2019/CERC Dated 09-10-2024). Please find our suggestion and feedback in the Annexure.

We request the Hon'ble Central Electricity Regulatory Commission to kindly consider our submission, as may be considered appropriate by the Commission.

Regards,

For Continuum Green Energy Private Limited



Authorised Signatory

Registered Office: Survey No. 356 & 391, Periyakumarapalayam Village, Gudimangalam, Dharapuram Taluk, Tirupur District,  
Coimbatore, Tamil Nadu, India, 642201.

Corporate Office: 402 & 404, Delphi, C Wing, Hiranandani Business Park, Orchard Avenue, Powai, Mumbai – 400076, Maharashtra, India.

+91 22 25701567 +91 22 25703360

CIN: U40102TZ2007PTC038605

Website: [www.continuumenergy.in](http://www.continuumenergy.in)

Email ID: [info@continuumenergy.in](mailto:info@continuumenergy.in)

**Annexure A**

<b>Comments on Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (Fourth Amendment) Regulations, 2024</b>				
<b>Sl. No.</b>	<b>Regulation No/Clause No.</b>	<b>Existing Clause as per the Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (Fourth Amendment) Regulations, 2024</b>	<b>Proposed Clauses suggested by Continuum Green Energy Private Limited (CGEPL) in the Existing Clause of the Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (Fourth Amendment) Regulations, 2024</b>	<b>Remarks for proposed clauses in the Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (Fourth Amendment) Regulations, 2024</b>
1)	<b>Regulation 13 Clause (2) Sub Clause (h)</b>	<p>(7) A new sub-clause (h) shall be inserted after sub-clause (g) under Clause (2) of Regulation 13 of the Principal Regulations as under:</p> <p>“(h) Any REGS based on wind or solar source which is eligible for a waiver of inter-state transmission charges under Regulation 13(2) of these regulations and is having its scheduled date of commissioning on or before 30th June 2025 is granted extension of time to achieve COD by the competent authority in terms of the Power Purchase Agreements (where PPA has been entered into with, a Renewable Energy Implementing Agency or a distribution licensee or an authorized agency on behalf of distribution licensee, consequent to tariff based competitive bidding) or the Commission (for cases other than specified PPA, on an appropriate application made by the entity), on account of any Force Majeure event including non-availability of transmission or for reasons not attributable to the REGS, and the project achieves COD before the extended date, it shall be eligible for a waiver of inter-state transmission charges as if the said REGS had achieved COD on 30.6.2025:</p> <p>Provided that, for the purpose of this Clause, such extension shall not exceed a period of six months at a time and not more than two times.”</p>	<p><b>We request you to consider the clause proposed by us,</b></p> <p>(7) A new sub-clause (h) shall be inserted after sub-clause (g) under Clause (2) of Regulation 13 of the Principal Regulations as under:</p> <p>“(h) Any REGS based on wind or solar source which is eligible for a waiver of inter-state transmission charges under Regulation 13(2) of these regulations and is having its scheduled date of commissioning on or before 30th June 2025 is granted extension of time to achieve COD by the competent authority in terms of the Power Purchase Agreements (where PPA has been entered into with, a Renewable Energy Implementing Agency or a distribution licensee or an authorized agency on behalf of distribution licensee, consequent to tariff based competitive bidding) or the Commission (for cases other than specified PPA, on an appropriate application made by the entity), on account of any Force Majeure event including non-availability of transmission or for reasons not attributable to the REGS, and the project achieves COD before the extended date, it shall be eligible for a waiver of inter-state transmission charges as if the said REGS had achieved COD on 30.6.2025:</p> <p>Provided that, for the purpose of this Clause, such extension shall not exceed a period of six months at a time and not more than two times.</p> <p><i>Provided further any REGS Project Developer who has applied for connectivity to the Central Transmission Utility (CTU) with a connectivity operationalization date is on or before 30th June 2025, however the said connectivity is delayed and such delay is not attributable to such REGS Project Developer then these projects shall be provided an extension in the Commercial Operation Date (COD) for the purpose of providing waiver in ISTS Transmission Charges until the date when connectivity is effectively provided and a corresponding waiver of ISTS (Inter-State Transmission System) charges shall be provided to such projects. Provided further that these projects shall be required to commission their projects as per the applicable Regulation after receipt of the connectivity.</i></p>	<p>In this regard we would like to submit that any REGS Project Developer who has applied for connectivity to the Central Transmission Utility (CTU) with a connectivity operationalization date is on or before 30th June 2025, however the said connectivity is delayed and such delay is not attributable to such REGS Project Developer then these projects shall be provided an extension in the Commercial Operation Date (COD) for the purpose of providing waiver until the date when connectivity is effectively provided and a corresponding waiver on ISTS (Inter-State Transmission System) charges shall be provided to such projects.</p> <p>The intention behind providing aforesaid waiver in the ISTS transmission charges to RE Projects is to promote RE so that more capacity addition shall be achieved from RE, therefore genuine REGS project who will be ready for commissioning on or before 30th June 2025, however the said Projects will be unable to commissioned due to delay in granting connectivity and the said delay is not attributable to them, then such projects shall be provided waiver in ISTS Transmission changes. This will also boost the confidence of RE investors as it will remove ambiguity and create healthy environment for investment in RE Sector which will help to achieve the target set up the Government of India to achieve 50% the capacity from non-fossil fuel by 2030.</p> <p>It is also worth to note that these project have been planned and executed by considering the aforesaid waiver in ISTS Transmission Charges hence if these waiver will not be provided to these genuine project then it will affect the project viability at no fault of such project developer. Provided further that these project shall be required to commission their projects as per the applicable Regulation after receipt of the connectivity.</p> <p>Further CTU shall prepare the list of the Projects who have applied for Stage II connectivity or Stage I and Stage II connectivity simultaneously and whose date of operationalization of the connectivity is on or before 30th June 2025, however the said connectivity will be or may delayed and such delay is not attributable to such project developer, and shall</p>



**Annexure A**

			<p><i>Provided further that CTU shall prepare the list of the Projects who have applied for Stage II connectivity or Stage I and Stage II connectivity simultaneously and whose date of operationalization of the connectivity is on or before 30th June 2025, however the said connectivity will be or may delayed and such delay is not attributable to such project developer, and shall submit before the Commission for their approval for the purpose of providing waiver in ISTS Transmission Charges</i></p> <p><i>Provided further that the same aforesaid treatment shall be provided for the projects which will come under Regulation 13 (2) (f) (i), who will be ready for the commissioning as per timelines mentioned under the said Regulation however their connectivity will be delayed and such delay will not be attributable to them.”</i></p>	<p>submit before the Commission for their approval for the purpose of providing waiver in ISTS Transmission Charges.</p> <p>Further the same aforesaid treatment shall be provided for the projects which will come under Regulation 13 (2) (f) (i), who will be ready for the commissioning as per timelines mentioned under the said Regulation however their connectivity will be delayed and such delay will not be attributable to them.</p> <p>Therefore in view of the above, we request you to consider the clause proposed by us.</p>
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