

# DISTRIBUTED SOLAR POWER ASSOCIATION



Ref: DiSPA/CERC/PH/ISTS/2024-25/02

Date: 24.11.2024

To  
The Secretary  
Hon'ble Central Electricity Regulatory Commission  
6<sup>th</sup>, 7<sup>th</sup> and 8<sup>th</sup> Floor, Tower B, World Trade Centre,  
Nauroji Nagar, New Delhi – 110029

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

Dear Sir,

To introduce Distributed Solar Power Developers Association “DiSPA” is a registered association of leading Renewable Energy developers and Sustainability Partners for the Commercial & Industrial consumers in the country, who are working actively in development of the Renewable Energy projects with Solar, Wind and Wind Solar Hybrid on both off-site and on-site mode.

The members are also active in investment and development of other initiatives for attaining decarbonization / carbon neutrality like Hybrid Technologies, Green Hydrogen, Green Ammonia, Pumped Hydro and Energy Storage Solutions etc.

In the abovementioned subject matter on behalf of the member developers the undersigned would like to make following comments and suggestions.

## SUBMISSIONS:

1. In the matter of Methodology for calculation of waiver of transmission charges in respect of drawee DICs which have obtained GNA<sub>RE</sub>

The regulations provides the formula as:

$$\text{Waiver (\%)} = 100 \times \frac{\text{sum of SDRG for all time blocks in the month}}{(\text{total number of time blocks in the month} \times 0.3 \times \text{GNARE})}$$

Further the Hon'ble CERC has published a **Staff Paper on modifications in the GNA Regulations** which provides for **Provision for grant of Solar hours Connectivity and Non-Solar hours Connectivity through the same Transmission system** which is a welcome move for the optimization of the utilization of the transmission resource.

However, it is submitted that if a transmission evacuation is utilized in a similar manner where the same connectivity / evacuation is allocated to two different entities as solar hour connectivity and non solar hour connectivity and solar hours are from 6 AM to 6 PM which is 50% of the day time and balance 50% is utilized by the other generating technology then it is most humbly submitted that:

The factor of 0.3 which is CUF based on 24 Hours of the day should be reduced to 0.15 as only 12 hours are being provided to the solar generation and the balance is provided to the non-solar hour generating technology.

- In the matter of calculation of the waiver from the 01.07.2025 onwards till 30.06.2029 which is after the 1<sup>st</sup> year of waiver where the waiver is 100% of the transmission charges it is most humbly submitted to the hon'ble commission to provide an illustration and / or confirm if the assumptions / illustration made by the applicant are correct.

The provision of the draft amendment provides that:

**Amendment to Regulation 13 of the Principal Regulations:**

*(6) The sub-clause (f) of Clause (2) of Regulation 13 of the Principal Regulations shall be substituted as under:*

*“(f) Waiver for REGS or RHGS based on wind or solar source or ESS or new Hydro projects or Green hydrogen or Green Ammonia Plants shall be calculated in terms of the following:*

*(i) REGS or RHGS based on wind or solar source or Battery ESS which is declared under commercial operation after 30.6.2025 or Hydro PSP ESS which has awarded the construction contract after 30.6.2025 shall be eligible for grant of waiver in the following manner:*

Category	(i) Period of COD (for REGS or RHGS based on wind or solar source and Battery ESS / (ii) Period of award of construction work (for hydro PSP ESS)	Number of years from COD	% of drawl Schedule from identified generating station or ESS, to be considered under Annexure-III
<b>REGS or RHGS based on wind or solar source or Hydro PSP ESS</b>	1.7.2025 to 30.6.2026	25 years	75
	1.7.2026 to 30.6.2027	25 years	50
	1.7.2027 to 30.6.2028	25 years	25
	After 30.6.2028		0

**Illustration Submitted:**

The regulations provides the formula as:

$$\text{Waiver (\%)} = 100 \times \frac{\text{sum of SDRG for all time blocks in the month}}{(\text{total number of time blocks in the month} \times 0.3 \times \text{GNARE})}$$

# DISTRIBUTED SOLAR POWER ASSOCIATION



Name of the Technology	Wind Solar Hybrid	
Total GNA <sub>RE</sub>	100	MW
Monthly Average CUF	55%	

	upto 30.06.2025	Waiver Calculation			
		01.06.2025 - 03-06.2026	01.06.2026- 30.06.2027	01.06.2027- 30.06.2028	01.06.2028- 30.06.2029
% age of drawl Schedule to be considered	100%	75%	50%	25%	0%
SDRG	158400	118800	79200	39600	0
SDTG	288000	288000	288000	288000	288000
Waiver % age	183%	138%	92%	46%	0%
Waiver % age Considered	100%	100%	92%	46%	0%

3. The Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2023.priovides that:

*(8) Clause (7) of Regulation 13 of the Principal Regulations shall be substituted as under:*

*“(7) Where Connectivity is granted to a Connectivity grantee other than Renewable Power Park Developer, on margins of existing system or on the augmented system with no ATS, and if the COD of such Grantee is delayed beyond start date of connectivity, the Connectivity grantee shall, corresponding to the capacity that is delayed, pay transmission charges from the start date of such Connectivity at the rate of Rs. 3000/MW/month:*

*Provided that where a Connectivity grantee is Renewable Power Park Developer and the generation capacity within the Renewable Power Park has not declared COD on or before start date of Connectivity in terms of GNA Regulations, the Renewable Power Park Developer shall pay transmission charges from the start date of such Connectivity at the rate of Rs. 3000/MW/month corresponding to generation capacity which have not achieved COD*

It is most humbly submitted that in the present scenario this provisions needs to be amended as:

- i. In the present scenario the applicant makes an application with a particular date in a particular substation where he either gets a connectivity in next phase / augmentation or in a totally new substation which may be an extension of this substation.
- ii. Due to this the applicant gets a COD date from the CTUIL which is say 2 years later then the COD desired by the applicant.

- iii. Thus accordingly the developer starts construction when the COD of the substation in which he is granted connectivity is declared as he cannot keep his system ideal.

Illustration:

- a) Applicant "A" makes an application for a connectivity of 300 MW at 220 KV at Substation Lakadia with SCOD as 30.06.2025.
- b) Where as due to system constraints and over booking of the capacity he gets the connectivity at a new substation called Lakadiya II with COD as per CTUIL as 30.06.2027.
- c) Now according to COD date of 30.06.2027 the developer starts the commissioning.
- iv. Now as per the above provisions in case of delay the extension of 6 months are applicable from the date of SCOD which was 30.06.2025 i.e. upto 30.12.2025 only with the penalty amount.
- v. Now since the COD provided by the CTUIL on award of final connectivity letter which got issued on 30.06.2025 is 30.06.2027 and the developer starts construction only after award of final connectivity letter as per the COD intimated to him by CTUIL i.e. 30.06.2027 and not as per 30.06.2025 in such case as per the existing provision of the if the project of the applicant gets delayed even by a day he is not eligible for time extension with penalty for a period of 6 months which will be injustice for him.

Thus it is humbly submitted that the provisions of calculation of 6 months as a grace period with penalty shall be amended to from the date of SCOD or date of connectivity as provided in final grant of connectivity which ever is later.

We believe that the honourable commission while issuance of the final order / amendment will consider the submissions and oblige.

Thanks' and Best Regards  
For Distributed Solar Power Association



ASHU GUPTA  
VICE -PRESIDENT  
DISTRIBUTED SOLAR POWER ASSOCIATION  
Ph: +91 9644400066| Email: contact@dispa.co.in