

From: Sibasis panda <Sibasis.panda@edf-re.in>
To: Harpreet Singh Pruthi <secy@cercind.gov.in>, Shilpa Agarwal <shilpa@cercind.gov.in>
Cc: Rohan Kale <Rohan.Kale@edf-re.in>, Kunal GAUBA <Kunal.GAUBA@edf-re.in>, Ajay MEHROTRA <Ajay.MEHROTRA@edf-re.in>
Sent: Mon, 11 Nov 2024 16:53:24 +0530 (IST)
Subject: Draft CERC Sharing Fourth 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 Draft Central Electricity Regulatory Commission (Sharing of inter-State Transmission Charges and Losses) (Fourth Amendment) Regulations, 2024.

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

[\[cid:image001.png@01DB3457.07403890\]](#)

Sibasis Panda
Deputy Manager-Regulatory

EDF Renewables India Private Limited
1st Floor, Eastern Wing,
Thapar House, 124, Janpath,
New Delhi - 110001, INDIA
Tel : [+91 11 47470100](tel:+911147470100)
Mob : [+91 97175 22158](tel:+919717522158)

**Comments/Suggestions on Draft CERC (Sharing of InterState Transmission Charges and Losses)
Fourth amendment Regulations, 2024**

| SI No of proposed amendment | Proposed amendment | Comments |
|-----------------------------|--|---|
| 7 | <p>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>The delays in commissioning of the the associated transmission system are not in control of the connectivity grantee and thus in case of "non-availability of transmission or for reasons not attributable to the REGS", the provision stating "such extension shall not exceed a period of six months at a time and not more than two times" needs to be deleted.</p> |
| 8 | <p>The second Proviso of Clause (3) of Regulation 13 of the Principal Regulations shall be substituted as follows:</p> <p>“Provided further that for cases of augmentation without ATS and where the Terminal Bay(s) at the ISTS sub-station, in the scope of the transmission licensee have achieved COD, which is not earlier than the start date of Connectivity, and the COD of a Connectivity grantee or the Renewable Power Park Developer, as the case may be, has not been achieved, the Connectivity Grantee or the Renewable Power Park Developer, as the case may be, shall pay Yearly Transmission Charges for the Terminal Bay(s) corresponding to the Connectivity capacity which has not achieved COD:</p> <p>Provided also that Yearly Transmission Charges in respect of the Associated Transmission System and terminal bay(s) corresponding to the Connectivity capacity that have achieved COD shall be included for determination of transmission charges of DICs in accordance with Regulations 5 to 8 of these regulations.</p> | <p>The Yearly Transmission Charges and terminal bays may be disclosed in the website of CTU after finalization of the tender of such Transmission System and transfer of SPV by the Bid Processing Coordinator in case of TBCB.</p> |