



# GRIDCO LIMITED

(A Govt. of Odisha Undertaking)  
(Formerly Grid Corporation of Orissa Limited)  
Regd. Office: Janpath, Bhubaneswar-751022  
CIN:U40109OR1995SGC003960

Ref: GRIDCO/73/2024-CGM(Commercial-PP)/ 1640

Date: 21/11/2024

To

The Secretary,  
Central Electricity Regulatory Commission,  
6th, 7th & 8th Floors, Tower B, World Trade Centre,  
Nauroji Nagar, New Delhi- 110029  
Email: [secy@cercind.gov.in](mailto:secy@cercind.gov.in), [shilpa@cercind.gov.in](mailto:shilpa@cercind.gov.in)

Sub- Views of GRIDCO Draft Central Electricity Regulatory Commission (Sharing of inter-State Transmission Charges and Losses) (Fourth Amendment) Regulations, 2024.

Ref: CERC Public Notice No. L-1/250/2019/CERC Dt. 09.10.2024

Sir,

With reference to the subject cited above and letter under ref., please find enclosed herewith the views/comments of GRIDCO on Draft Central Electricity Regulatory Commission (Sharing of inter-State Transmission Charges and Losses) (Fourth Amendment) Regulations, 2024 for kind necessary action at your end.

Yours faithfully

CGM (PP)

**Views of GRIDCO on Draft Central Electricity Regulatory Commission (Sharing of inter-State Transmission Charges and Losses) (Fourth Amendment) Regulations, 2024.**

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

**A. Proposed in the Draft:**

(3) New sub-clauses (a-i) and (a-ii) shall be inserted after sub-clause (a) in Clause (2) of Regulation 13 of the Principal Regulations: “(a-i) Hydro PSP ESS, which has awarded the contract on or before 30.6.2025, shall be eligible for a waiver of transmission charges for a period of 25 years from the COD, subject to conditions as per sub-clause (c) of this Clause.

**Proposal of GRIDCO:**

3) New sub-clauses (a-i) and (a-ii) shall be inserted after sub-clause (a) in Clause (2) of Regulation 13 of the Principal Regulations: “(a-i) Hydro PSP ESS, which has awarded the contract on or before ~~30.6.2025~~ 30.06.2028, shall be eligible for a waiver of transmission charges for a period of 25 years from the COD, subject to conditions as per sub-clause (c) of this Clause.

Proposed in the Draft:

(f) Waiver for REGS or RHGS based on wind or solar source XXXXXXXXor 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
<b>Battery ESS</b>	1.7.2025 to 30.6.2026	12 years	75
	1.7.2026 to 30.6.2027	12 years	50
	1.7.2027 to 30.6.2028	12 years	25
	After 30.6.2028		0

## Proposal of GRIDCO:

(f) Waiver for REGS or RHGS based on wind or solar source XXXXXXXXXX or Hydro PSP ESS which has awarded the construction contract after 30.06.2028 ~~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 from Schedule identified generating station or ESS, to be considered under Annexure-III
REGS or RHGS based on wind or solar source or <del>Hydro PSP ESS</del>	1.7.2025 to 30.06.2026	25 years	75
	1.7.2026 to 30.06.2027	25 years	50
	1.7.2027 to 30.06.2028	25 years	25
	After 30.06.2028		0
<u>Hydro PSP ESS</u>	<u>1.7.2028 to 30.06.2029</u>	<u>25 years</u>	<u>75</u>
	<u>1.7.2029 to 30.06.2030</u>		<u>50</u>
	<u>1.7.2030 to 30.06.2031</u>		<u>25</u>
	<u>After 30.06.2031</u>		<u>0</u>
Battery ESS	1.7.2025 to 30.06.2026	12 years	75
	1.7.2026 to 30.06.2027	12 years	50
	1.7.2027 to 30.06.2028	12 years	25
	After 30.06.2028		0

### Views:

It is suggested that the period for award of construction work for Hydro PSP ESS for availing 100 % waiver of ISTS charges may be extended by another 3 years till 30.06.2028 to enable States like Odisha to maximise their potential from such sources.

### Justification:

1. Odisha's geographical and geological conditions make the State a preferred destination for PSPs. The State's PSP policy is in the final stages for approval of assets for development of such projects. However, the award of contract for construction PSPs take lot longer due to number of clearances required for such projects when compared to other Renewable projects.
2. Odisha has a potential of around 45 GW of PSP potential. Till date we have received expression of interests of around 14 GW. MoU of around 3 GW has been executed with the Central PSUs. Award of contracts will take much longer due to the associated activities related with awarding contracts of PSPs. Tariff for PSP remains higher which needs to be rationalized in consumer interest.

## **B. Proposed in the Draft:**

(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: 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.”

### **Views:**

With respect to the new sub-clause (h) of Clause (2) of Regulation 13 of the Principal Regulations it is submitted that:

GRIDCO has executed 03 Power Sale Agreements with SECI to procure 1000 MW Wind Power towards Compliance of RPO

All necessary steps were taken by GRIDCO for an early execution of the PSA with due approval of OERC to avail the waiver of ISTS Charges allowed by Ministry of Power, Govt. of India.

SECI has allowed 18 Months (Tranche-XI)/ 24 Months to the Wind Power Projects under the Schemes for commissioning of the Project from the date of PPA between SECI and Wind Power Developers (WPD). The Scheduled Commissioning Date (SCD) of the above Projects were before 30.06.2025

However, due to delay in various stages such as delay in Tariff Adoption and Delay in approval of the PSA in other State Electricity Regulatory Commission, the Scheduled Commissioning of the Projects has been revised by SECI to beyond 30.06.2025. Details of the Power Sale Agreements with SECI and data of the Actual SCD and Revised SCD is provided below:

Sl. No	Scheme	Contracted Capacity in MW	Date of PSA with SECI	Actual SCD	Revised SCD
1.	ISTS Connected Wind Power Projects Scheme Tranche-XI	10	07.11.2022	30.12.2023	26.07.2025

2.	ISTS Connected Wind Power Projects Scheme Tranche-XII	390	02.02.2023	29.03.2025	23.01.2026
3.	ISTS Connected Wind Power Projects Scheme Tranche-XIII	600	09.06.2023	26.05.2025	02.12.2025
	Total	1000			

The WPDs are anticipating further delay in projects due to delay in availability of the Transmission Corridor and delay in getting the NoC from Ministry of Defence (MoD) for setting up Wind Masts in the restricted areas denoted by MoD.

Moreover, Developers have also applied before Hon'ble CERC for allowing them to withdraw from the PPA due to the above said reasons.

It is anticipated that some of the projects under the above Schemes may not come even before 30.06.2026 i.e. the time limit for getting a waiver of ISTS charges after allowing an extension of one year. Therefore, it is requested before Hon'ble Commission to grant further time beyond the permissible time of one year on a case-to-case basis with due diligence. For the remaining projects, the burden of applicable ISTS charges may be borne by the entity accountable for the delay.