

Ref: JGEPL/CERC/BD/2024-25/02

Date: 11-11-2024

To,
The Secretary Central Electricity Regulatory Commission,
6th - 8th Floor, World Trade Centre, Tower B,
Nouroji Nagar, New Delhi – 110029

Subject: Comment/Suggestions on “Draft Central Electricity Regulatory Commission (Sharing of inter State Transmission Charges and Losses) (Fourth Amendment) Regulations, 2024”.

Ref No: CERC’s Public Notice having reference no. L-1/250/2019/CERC dated 9th October 2024.

Dear Sir,

We, Juniper Green Energy Private Limited (part of AT Capital Group), take this opportunity to introduce ourselves as an independent renewable energy power producer and operator of solar, wind and hybrid power projects with significant experience in conceptualizing, building, and developing renewable energy assets.

Juniper Green Energy group, headquartered at Delhi NCR, commenced operations in October 2018. The business has experienced rapid growth, and it presently has an operational portfolio of about 1.1 GW with an under-construction capacity of more than 3 GW and further development pipeline of over 6 GW capacity of solar, wind and hybrid projects. Juniper Green Energy Group is part of the AT Capital Group which has built and owned “Orange Renewable”, a 1GW renewable energy platform in the past.

With reference to CERC’s Public Notice under reference no. 1 above, we hereby submit our comment/suggestions regarding ‘Draft Central Electricity Regulatory Commission (Sharing of inter State Transmission Charges and Losses) (Fourth Amendment) Regulations, 2024’, enclosed at Annexure A.

This is for your kind consideration.

**Thanking You,
For Juniper Green Energy Private Limited**



Authorized Signatory
Enclosure: Annexure A



Juniper Green Energy Private Limited

Registered office: F-9, First Floor, Manish Plaza-1, Plot No. 7 MLU, Sector-10, Dwarka New Delhi-110075 CIN: U40100DL2011PTC228318
Corporate office: Plot No. 18, 1st Floor, Institutional Area, Sector 32, Gurugram Haryana-122001 Tel +91-124 4739600, Fax +91-124 4739666
website: <http://junipergreenenergy.com>; Email: info@junipergreenenergy.com

Annexure A

Clause No.	Description	Our Suggestion	Rationale
7 (h)	<p>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>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>Similarly, 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 2026 or 30th June 2027 or 30th June 2028 respectively, is granted extension of time to achieve COD by the competent authority, it shall be eligible for a waiver of inter-state transmission charges as if the said REGS had achieved COD on 30.6.2026, 30.6.2027 or 30.6.2028.</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>1. As per the current proposed amendments, clarification for waiver for the projects having COD on or before 30.06.2025 and getting extensions due force majeure and related reasons have been provided. However, clarification for waiver for the projects having COD before next threshold timeline, i.e. 30.06.2026, 30.06.2027 and 30.06.2028 respectively and getting extensions due force majeure and related reasons beyond 30.06.2026, 30.06.2027 and 30.06.2028 respectively, has not been provided. We request honourable commission to kindly consider similar treatment for the projects having COD before next threshold timeline.</p>



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