

To
The Secretary,
Central Electricity Regulatory Commission,
6th, 7th & 8th Floor, tower B, World Trade Centre,
Nauroji Nagar, New Delhi-110029

Subject: CERC Sharing of Inter-State Transmission Charges and Losses) (Fourth Amendment) Regulations, 2020.

Reference: CERC Draft Notification dated 09.10.2024.

Dear Sir,

Greetings from ReNew Private Limited!

ReNew Pvt. Ltd. is one of the largest renewable power producers in India, having an aggregated portfolio of ~20 GW, including more than 10 GW of operational capacity. We have portfolio of solar, wind & hydro assets with presence over ten states in the country. The company is also the first Indian renewable company to be listed on NASDAQ.

This is in reference to Draft Sharing of Inter-State Transmission Charges and Losses) (Fourth Amendment) Regulations, 2020. We are herewith submitting our comment as per **Annexure-1**.

We request your good office to kindly consider our comment while finalizing the same.

Thanking you.

Yours Sincerely,



for ReNew Private Limited



ReNew Private Limited
(Formerly known as ReNew Power Private Limited)

CIN: U40300DL2011PTC291527

Corporate Office: ReNew.Hub, Commercial Block-1, Zone 6, Golf Course Road, DLF City Phase-V, Gurugram - 122009

Registered Office: 138, Ansal Chambers- II, Bhikaji Cama Place, New Delhi -110066

W www.renew.com **T** +91 124 489 6670 **F** +91 124 489 6699

ANNEXURE-1

ReNew Suggestions on the 4th draft Amendment to the Sharing Regulations 2020

Regulation	Proposed in the draft amendment	Comments/Suggestions	Rational
13.2(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	Hydro PSP ESS, which has awarded the contract on or before 30.6.2028 , 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.	Pumped Storage Projects are in the early stages of development and involve an extensive pre-construction phase, including activities such as DPR approval, forest clearance, and environmental clearance. Consequently, PSPs necessitate an extended timeframe for incentivized benefits, such as the waiver of ISTS transmission charges.
13.2(e)	Hydro generating station where (a) PPAs are signed on or after 1.12.2022 but on or before 30.06.2025 and (b) construction work is awarded on or after 1.12.2022 but on or before 30.06.2025 shall be considered for waiver of transmission charges under this Regulation, for a period of 18 years from the date of COD of the hydro generating station	Hydro generating station where having COD on or after 08.03.2019 but on or before 30.06.2025 shall be considered for waiver of transmission charges under this Regulation, for a period of 25 years from the date of COD of the hydro generating station.	There should not be multiple timelines for providing benefits. All the projects which were eligible for supplying HPO compliance power as per MoP's notification dated 08.03.2019, should be eligible for 100% waiver i.e. projects achieving COD after 08.03.2019.
13(3)	The second Proviso of Clause (3) of Regulation 13 of the Principal Regulations shall be substituted as follows: "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	"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 <u>and the transmission system required for start of connectivity have also achieved the COD, which are not earlier</u> 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	We would like to bring to the kind attention of the Hon'ble Commission that the RE Developers seeks connectivity form a specific date in the Application. However, while intimating grant of connectivity, CTU provides that the connectivity will start for the date sought by the Applicant or the readiness of the transmission system required for start of the Connectivity, whichever is later. Therefore, the connectivity grantee, utilizes the connectivity once the entire transmission system required for connectivity is commissioned. Only readiness of terminal bays will not help connectivity grantee for evacuation of power.

<p>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>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>In view of the above, we request the Hon’ble commission that if a connectivity grantee seeks/granted connectivity (including readiness of terminal bays) from a single date but is unable to utilize the bay due to the transmission system's non-readiness, then transmission charges for the terminal bay should not be imposed on the connectivity grantee until the entire transmission system is ready for use.</p>
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