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Sent: Mon, 11 Nov 2024 19:03:18 +0530 (IST)
Subject: FW: Comments_Draft (Sharing of Inter-State Transmission Charges and Losses) (Fourth Amendment) Reg, 2024

Dear Sir/Madam ,

This is with reference to the comments invited by the Hon'ble Commission on Draft (Sharing of Inter-State Transmission Charges and Losses) (Fourth Amendment) Reg, 2024.

In this regard, we **Torrent** Power Limited take this opportunity to express our gratitude for giving us an opportunity to submit our comments/ suggestions on the subject matter.

Vide trailing mail, we submitted suggestion, however, we earnestly request you to refer the attached suggestion as a final submission. We earnestly request you to give due consideration to our comments/ suggestions attached herewith while finalizing the said notification.

Regards,
Bhushan Shah
AGM - RE (BD)
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Torrent Power Limited - Comments/ Suggestions on Draft (Sharing of Inter-State Transmission Charges and Losses) (Fourth Amendment) Regulations, 2024.

Sl. No.	Description	Suggestion	Rationale
1	<p>(7) “(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.”</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 01st July 2028 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 per trajectory provided for waiver of transmission charges in MOP order dated 23rd Nov 2021 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>	<ul style="list-style-type: none"> • The proposed amendment provides clarification for waiver for the projects having COD on or before 30th Jun 2025, it is silent on cases where COD of the project fall between 1st July 2025 to 1st July 2028. • MoP vide its order dated 23rd Nov 2021, specifies the trajectory for waiver of transmission charges having period of commissioning till 30th Jun 2028. Our suggestion is to include all the projects where COD falls between 1st July 2025 to 1st July 2028. • In this regard we would like to humbly submit that any extension on account of Force Majeure event or for the reasons not attributable to the REGS shall be granted till time that FM event continues and shall not be limited 1 year as the generators should not suffer for any of the reason that is beyond their control and not attributable to them. Therefore, we request Hon’ble commission to kindly consider deletion of the stated proviso while finalising the regulation.