

**From:** "sonika hayaran" <[sonika.hayaran@zelestra.energy](mailto:sonika.hayaran@zelestra.energy)>  
**To:** "Harpreet Singh Pruthi" <[secy@cercind.gov.in](mailto:secy@cercind.gov.in)>, "Shilpa Agarwal" <[shilpa@cercind.gov.in](mailto:shilpa@cercind.gov.in)>  
**Cc:** "jayakrishnan chonat" <[jayakrishnan.chonat@zelestra.energy](mailto:jayakrishnan.chonat@zelestra.energy)>, "sajay kv" <[sajay.kv@zelestra.energy](mailto:sajay.kv@zelestra.energy)>, "sayan chakraborty" <[sayan.chakraborty@zelestra.energy](mailto:sayan.chakraborty@zelestra.energy)>  
**Sent:** Wednesday, November 20, 2024 11:09:05 AM  
**Subject:** Submission of comments on Draft CERC (Sharing of Inter-State Transmission Charges and Losses) (Fourth Amendment) Regulations, 2024

Dear Mam/Sir,

Greetings from **Zelestra**!

This is with reference to public notice dated 11.11.2024 & 9.10.2024 where comments/ suggestions/ objections solicited from the stakeholders on Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (Fourth Amendment) Regulations, 2024. We thank you for providing this opportunity, please find our comments enclosed herewith. We sincerely request the Hon'ble Commission to consider these suggestions/requests while finalising the regulations.

#### About Zelestra

**Zelestra** is a global, multi-technology, customer-focused renewable energy company headquartered in Spain. With a portfolio of 26 GW of carbon-free projects across 13 countries, **Zelestra** is a vertically integrated company specializing in developing, commercializing, constructing, and operating large-scale renewable energy projects. **Zelestra** is made up of 953 professionals globally. It is backed by EQT, one of the largest fund managers in the world, with more than 242 billion euros in assets under management.

**Zelestra** India currently has 2.1 GW of projects in operation, construction, signed, or awarded. Additionally, its project pipeline, including those in the development phase, is close to 5 GW, with a target of doubling that capacity to 10 GW in the next six years.

**Sonika Hayaran**  
Regulatory Manager

[sonika.hayaran@zelestra.energy](mailto:sonika.hayaran@zelestra.energy)  
[www.zelestra.energy](http://www.zelestra.energy)

# Solarpack India LLP

November 20, 2024

Zelestra's comments in draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (Fourth Amendment) Regulations, 2024.

Clause No.	Draft Amended Regulation	Change suggested	Rationale
Regulation 13 (2) (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	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 <del>delay in non-availability of start date of connectivity/GNA due to delay in availability of transmission system or for</del> other reasons not attributable to the REGS, and the project achieves COD before the extended date, it shall be eligible for	REGS shall not suffer because of delay in transmission system, which is beyond control of the REGS. Hon'ble Commission is requested to allow the extensions on actuals where there is delay in availability of Transmission system.

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Clause No.	Draft Amended Regulation	Change suggested	Rationale
	<p>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>a waiver of inter-state transmission charges as if the said REGS had achieved COD on <del>30.6.2025</del> <b>respective waiver dates in terms of Regulation 13 of these Regulations.</b></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><b>Provided in case of delay in start date of connectivity due to delay in availability of transmission system the extension shall be provided as per actual delay and waiver slabs shall be applicable as per the original schedule.</b></p>	