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REF:- ACME/BUS/211116/0056 Date: 21.11.2016

To

Smt. Shubha Sarma

Secretary,

Central Electricity Regulatory Commission,

3rd & 4th Floor, Chandralok Building,

36 Janpath, New Delhi-110001

Subject: Submission of comments/suggestions on *"Draft Central Electricity Regulatory Commission (Sharing of inter-State Transmission Charges & Losses) (Fifth Amendment) Regulations, 2016."*

Dear Madam,

This is with reference to the subject draft Central Electricity Regulatory Commission (Sharing of inter-State Transmission Charges & Losses) (Fifth Amendment) Regulations, 2016 published on the website of Hon'ble Commission inviting comments/suggestions from the stakeholders.

We are hereby submitting our comments/suggestions as Annexure-I and we sincerely request the Hon'ble Commission to consider our submission while finalizing the subject regulations.

Thanking You

Yours sincerely,

For **Acme Cleantech Solutions Pvt. Ltd.**

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Annexure-1

ACSPL comments on Draft Central Electricity Regulatory Commission (Sharing of inter-State Transmission Charges & Losses) (Fifth Amendment) Regulations, 2016.

Sr. No.	Clause in Draft Amendment	Suggestion/Comments	Rationale/Reason
1.	**2. Amendment to Regulation 7 of the Principal Regulations:** **(2)** A New Sub clause (y) to Clause (1) to Regulation 7 of Principal Regulations shall be added as under: "No transmission charges and losses for the use of ISTS network shall be attributed to Wind based generation for the projects awarded through competitive bidding and commissioned till 31.3.2019. This shall be applicable for a period of 25 years from the date of commissioning of such projects. Provided that such waiver will be available only for the projects entering into Power Purchase Agreements (PPAs) for sale of electricity to the Distribution Companies for compliance of their renewable purchase obligation."	This New Sub clause (y) to Clause (1) to Regulation 7 of Principal Regulations shall also include as under: "No transmission charges and losses for the use of ISTS network shall be attributed to **Solar based** generation for the projects awarded through competitive bidding and commissioned **within the time period of National Solar Mission (NSM) i.e. till 31.03.2022**. This shall be applicable for a period of 25 years from the date of commissioning of such projects."	First of all our humble submission is that there should not be any discrimination in Wind and Solar projects and should be treated at par and should be extended to solar projects also. The benefits of transmission charges & losses of ISTS should be aligned with NSM. Although it is clarified in the Explanatory Memorandum and as per existing regulation, that solar projects which will get commissioned upto 30.06.2017 are already exempted from transmission charges and losses for the useful life of project, it is also important to note herein that the commissioning of solar projects are getting delayed due to various reasons not attributable to the SPDs like implications of GST, delay due to regulatory approvals of PPAs, land availability issues etc. and hence such projects may not be able to achieve their commissioning before 30.06.2017. The Solar power sector is evolving and growing with the solar capacities being added under the NSM and will take time for proper clarity on the issues being faced by the current commissioned and under commissioning projects. Hence these benefits should be extended till 31.03.2022 i.e. till the NSM achieves its target of 100GW capacity and attains maturity and stability, so that to encourage the developers.

ACME Cleantech Solutions Private Limited