

Manish K. Singh Secretary

No. InWEA/61/2018-19

August 28, 2018

To,

The Secretary
Central Electricity Regulatory Commission,
3 rd & 4 th Floor, Chanderlok Building,
36, Janpath, New Delhi- 110001

Subject: Comments/Suggestions/Objections on Draft Central Electricity Regulatory Commission (Grant of Connectivity, Long-term Access and Medium-term Open Access in inter-State Transmission and related matters) (Seventh Amendment) Regulations, 2018

Respected Sir,

This is with reference to the publication of the Draft "Central Electricity Regulatory Commission (Grant of Connectivity, Long-term Access and Medium-term Open Access in inter-State Transmission and related matters) (Seventh Amendment) Regulations, 2018", published on website of the Hon'ble Commission, on which comments/suggestions/objections have been invited by the Hon'ble Commission.

In this regard, We, Indian Wind Energy Association (InWEA), would like to take an opportunity to introduce ourselves, as an association, registered at New Delhi to represent the interest of various stakeholders in wind energy sector. InWEA, with more than 300 members, representing different parts of wind industry has been dedicated to promotion and development of wind power in India.

We would like to submit our comments/suggestions/objections on the said draft amendment for the consideration of Hon'ble Commission. Our comments/suggestions/objections are summarised in Annexure I enclosed herewith.

I, Manish K Singh, Secretary of InWEA is duly authorized to file these comments/ suggestions on its behalf.

InWEA requests Hon'ble Commission to accept enclosed comments/suggestions. InWEA further requests the Hon'ble Commission to grant an opportunity in person before Hon'ble Commission during the Public Hearing (if scheduled) on the above matter.

Thanking you,

(Manish K. Singh)

Enclosure: - Annexure -1: Comments on Draft "Central Electricity Regulatory Commission (Grant of Connectivity, Long-term Access and Medium-term Open Access in inter-State Transmission and related matters) (Seventh Amendment) Regulations, 2018"

Annexure 1

	(flot this clause and seeking connectivity to the existing	referred to in sub-clauses (b)(i)(a) to (cc)	
inadvertent omission.	description referred to in sub-clauses (b)(i)(a) to (cc) and	generating station of the description	
generating station. Probably this was an	park Developer in its existing generating station of the	generating company in its existing	
right to get connectivity and commission the	developed by a generating company/ Renewable power	30 www capacity developed by a	
rights as a generating company as WPPD has the	capacity and above but less than 50 MW capacity	of 5 MW capacity and above but less than	
Renewable park developer should have the same	Any renewable energy generating station of 5 MW	Any renewable energy generating station	2.(1)(b)(i)(e)
		generator, or;	
		station under CTU, termed as the lead	
	station under CTU, termed as the lead generator, or;	connection point at the pooling sub-	
74	CTU at a single connection point at the pooling sub-	connection from CTU at a single	
	these generating stations, and seeking connection from	these generating stations, and seeking	
	capacity of 50 MW and above, and acting on behalf of all	and above, and acting on behalf of all	
	capacity, but collectively having an aggregate installed	an aggregate installed capacity of 50 MW	
	developer individually having less than 50 MW installed	installed capacity, but collectively having	
be in such a situation like a generating company	by a generating company or Renewable power park	individually having less than 50 MW	
The Renewable power park developer may also	Renewable Energy generating station being developed	Renewable Energy generating station	2.(1)(b)(i)(cc)
		6	CHAPTER-1
	indicated in Double underline)		
Remarks	InWEA's Suggestions (Proposed additions are	Proposed amendments	Clause No.

term Open Access in inter-State Transmission and related matters) (Seventh Amendment) Regulations, 2018 InWEA's comments/suggestions on Draft Central Electricity Regulatory Commission (Grant of Connectivity, Long-term Access and Medium-

	the existing connection point with inter-	through the electrical system of the generating station	
	State Transmission System through the	subject to availability of Connectivity capacity in existing	
	electrical system of the generating	station as assessed by CTU.] ³	
	station subject to availability of		
	Connectivity capacity in existing station		
	as assessed by CTU.] ³		
CHAPTER-3			
8(1)	(1) [The application for connectivity	(1) [The application for connectivity shall contain	Renewable Park developer is also an eligible
	shall contain details such as,	details such as, proposed geographical location of	applicant and should have the same level playing
	proposed geographical location of the	the applicant, quantum of power to be interchanged	field as the other stake holders in revising the MW
	applicant, quantum of power to be	that is the quantum of power to be injected in the	connectivity applied for.
	interchanged that is the quantum of	case of a generating station including a captive	
	power to be injected in the case of a	generating plant and quantum of power to be drawn	
	generating station including a captive	in the case of a bulk consumer, with the inter-State	×
	generating plant and quantum of	transmission system and such other details as may	
	power to be drawn in the case of a	be laid down by the Central Transmission Utility in	
	bulk consumer, with the inter-State	the detailed procedure:	
	transmission system and such other	Provided that where after filing of an application,	
	details as may be laid down by the	there has been any material change in the location	
	Central Transmission Utility in the	of the applicant or change in the quantum of power	
	detailed procedure:	to be interchanged with the inter-state transmission	
	Provided that where after filing of an	system, by more than 100 MW in the case of	
	application, there has been any	applicant defined under sub-clauses (b)(i)(a) of	
	material change in the location of the		
	applicant or change in the quantum of		

applicant defined under sub-clauses with these regulations which shall be considered in accordance applicant shall make a tresh application, defined under sub-clauses (b)(i)(c) and whichever is less, in the case of applicant 40% of the aggregate installed capacity, Regulation 2 (1) (b) (i) (b) and 100MW or (b)(i)(h) of Clause (1) of Regulation 2 under sub-clauses (b)(i)(aa), (b)(i)(b), and is less, in the case of applicant defined 40% of the installed capacity, whichever Regulation 2 (1) (b) (i) (a) and 100MW or (b)(i)(a) of Clause (1) of Regulation 2 more than 100 MW in the case of inter-state transmission system, by power to Regulation 2 (1) (b) (i) (c), such an (b)(i)(cc) of Clause (1) of Regulation 2 be interchanged with the be considered in accordance with these regulations.

or hybrid of renewable sources), subject of CTU, utilize the same Connectivity for a specific project can, with prior approval with the grid or granted connectivity for Provided that an applicant connected additional generation capacity (for same

and 100MW or 40% of the installed capacity, whichever is less, in the case of applicant defined under sub-clauses (b)(i)(aa), (b)(i)(b), Clause (1) of Regulation 2 Regulation 2 (1) (b) (i) (a) an applicant shall make a fresh application, which shall (b)(i)(h) of Clause (1) of Regulation 2 Regulation 2 (1) (b) capacity, whichever is less, in the case of applicant (i) (b) and 100MW or 40% of the aggregate installed Clause (1) of Regulation 2 Regulation 2 (1) (b) (i) (c), such defined under sub-clauses (b)(i)(c) and (b)(i)(cc) of <u>b(1(i)(f)</u> and

injection at any point of time does not exceed the Code and all other regulations of the Commission, such commercial responsibilities for the additional capacity in quantum of total Connectivity granted for the existing renewable sources), subject to the condition that net additional generation capacity (for same or hybrid of approval of CTU, utilize the same Connectivity for granted connectivity for a specific project can, with prior Provided that an applicant connected with the grid or payment/adjustment of following the provisions of the Indian Electricity Grid as grid security, scheduling and dispatch, collection and generating station shall undertake all operational and project. For such additional generation capacity, existing Transmission charges, \subseteq

whose control area it is located;	with copy to the respective RLDC in	undertaking in this regard to the CTU,	other charges etc., and submit an	charges, UI charges, congestion and	payment/adjustment of Transmission	dispatch, collection and	such as grid security, scheduling and	other regulations of the Commission,	the Indian Electricity Grid Code and all	capacity in following the provisions of	responsibilities for the additional	operational and commercial	generating station shall undertake all	additional generation capacity, existing	for the existing project. For such	quantum of total Connectivity granted the respective RLDC in whose control area	point of time does not exceed the an undertaking in this regard to the CTU, with copy to	to the condition that net injection at any charges, congestion and other charges etc., and submit
																rea it is located;	TU, with copy to	etc., and submit

generators, whose aggregate capacity is shall be considered by CTU only if all the the applicant defined under Regulation 2 generators to undertake all operational generator shall act on behalf of all the among connected at (1) (b) (i) (c) and Regulation 2(1)(b)(i)(cc), Provided further that the application by point, formalize a written agreement etc., and submit a copy of the agreement adjustment of transmission charges, UI such as grid security, scheduling and other Regulations of the Commission, the Indian Electricity Grid Code and all that point in following the provisions of the collective generators connected at and commercial responsibilities for all is located respective RLDC in whose control areas it connectivity, along with a copy to the charges, congestion and other charges, dispatch, collection and payment/ themselves that the lead CTU, with the application of the single connection

Provided further that the application by the applicant charges, etc., and submit a copy of the agreement to the dispatch, collection and payment/ adjustment of Indian Electricity Grid Code and all other Regulations of connected at that point in following the provisions of the responsibilities undertake generator shall act on behalf of all the generators to written agreement among themselves that the lead only if all the generators, whose aggregate capacity is 2(1)(b)(i)(cc) and 2(1)(b)(i)(f) shall be considered by CTU defined under Regulation 2 (1) (b) (i) (c) and Regulation copy to the respective RLDC in whose control areas it is CTU, with the application of connectivity, along with a transmission charges, UI charges, congestion and other the Commission, such as grid security, scheduling and connected at the single connection point, formalize a located for all the collective generators operational and commercial

The Renewable power park developer is on par with a generating company and hence need be included for consideration of Lead Generator

term Open Access in inter-State Transmission and related matters) (Seventh Amendment) Regulations, 2018 InWEA's comments/suggestions on Draft Central Electricity Regulatory Commission (Grant of Connectivity, Long-term Access and Medium-

system of the generating station and generating on behalf of the renewable energy agrees to act as the "Principal Generator". only if the existing generating station 2(1) (b)(i) (e) shall be considered by CTU the applicant defined under Regulation connectivity through the electrical Provided further that the application by undertake agreement/arrangement among them to formalizes submit a copy of the congestion and other charges etc., and grid security, scheduling and dispatch, Electricity Grid Code and all other in following the provisions of the Indian commercial responsibilities for the Agreement to the CTU, along with the Transmission charges, collection and payment/adjustment of regulations of the Commission, such as renewable energy generating station(s) all operational station(s) ⊆ charges, seeking written and RLDC in whose control area it is located.]6

Provided further that the application by the applicant operational and commercial responsibilities for the charges, congestion and other charges etc., and submit payment/adjustment of Transmission charges, UI other regulations of the Commission, such as grid provisions of the Indian Electricity Grid Code and all renewable energy generating station(s) in following the shall be considered by CTU only if the existing generating defined under Regulation 2(1) (b)(i) (e) and 2(1)(b)(i)(f)application for connectivity, with copy to the respective a copy of the agreement to the CTU, along with the security, scheduling and dispatch, collection agreement/arrangement among them to undertake all generating station seeking connectivity through the electrical system of the behalf of the renewable energy generating station(s) station agrees to act as the "Principal Generator" on and formalizes a written and

The Renewable Power Park Developer need also be made eligible to become "principal Generator" for the same reasoning as for "Lead Generator"

term Open Access in inter-State Transmission and related matters) (Seventh Amendment) Regulations, 2018 InWEA's comments/suggestions on Draft Central Electricity Regulatory Commission (Grant of Connectivity, Long-term Access and Medium-

application for connectivity, with copy to

generators in the detailed procedure and	formal agreement amongst such <u>undertaken by the Renewable power park developer.</u>	suitably incorporate the requirement of with such lead generator, which role may	Provided further that the CTU shall detailed procedure and Connection Agreement signed	generators. of formal agreement amongst such generators in the	on behalf of the solar <u>Renewable</u> power that the CTU shall suitably incorporate the requirement	including arrangement for connectivity solar Renewable power generators. Provided further	undertake infrastructural activities including arrangement for connectivity of	Government or the State Government to undertake infrastructural activities	Developer is authorised by the Central authorised by the Central Government	if the Solar—Renewable Power Park Park Developer as defined under 2(1)(b)(i)	(b) (i) (f) shall be considered by CTU only considered by CTU only if the SolarRenewable Power	continued applicant defined under Regulation 2(1) defined under Regulation 2(1) (b) (i)	8(1) Provided also that the application by the Provided also that the application	the respective RLDC in whose control area it is located.]6
	wer park developer.]	ole may or may not be	on Agreement signed	uch generators in the	orate the requirement	ors. Provided further	tivity on behalf of the	rastructural activities Renewable power park developer	rnment or the State The lead generator role could be assigned to the	<u>nder 2(1)(b)(i) (f)</u> is	olar Renewable Power power park developer"	(b) (i) (f) shall be regulation is inserted after the word "Renewable	application by the applicant To give more clarity the relevant reference to	

WGS can be asked to be varied as per the system			
regulation in IEGC. The reactive power from the		compensation at the pooling station.	
power factor. This was already covered under a		with regard to requirement of reactive	
voltage profile and not just at a fixed value of		on Transmission Planning Criteria 2013,	
exchange should be carried out as per the system		specified at Clause 16.4 of CEA Manual	
power factor control. Further, the reactive power	00	project shall comply with requirements	
of the WGS for active and reactive power or		The developer of renewable generation	
control point is to be reckoned as the pooling SS		12.2.2(vi) of the Procedure	
and also technically inappropriate. Therefore the	٠		
premises of a different organization is not feasible	will be governed by IEGC clause 5.2(u)(i) and (ii)	Regulations.	
above all control panel of the WGUs located in the	interconnection point. The reactive power exchanges	have been issued under these	
end. Its maintenance and trouble shooting and	pooling station of the WGS itself and not at the grid	1/(3)/2009-CERC shall be deemed to	
would be not appropriate to install it at PGCIL	generating stations (WGS) are to be reckoned at the	vide order dated 15.5.2018 in File No. L-	
to be located at the pooling SS of WGS and it	reactive power exchanges/power factor for the wind	inter-State transmission system issued	
network for active and reactive power controls, is	the pooling station. However, the control point of the	Projects based on Renewable Sources to	
numbers) in a WGS of 300 MW through fibre optic	with regard to requirement of reactive compensation at	grant of Connectivity to	
The PPC, which controls all the WGUs (about 150	CEA Manual on Transmission Planning Criteria 2013,	Provided that the Detailed Procedure for	
interconnection point viz. at the PGCIL end.	comply with requirements specified at Clause 16.4 of		
control of reactive power is to be done at the	The developer of renewable generation project shall	issued from time to time.	
The extant order gives an impression that the	modified as follows:	shall be as per the Detailed Procedure	
1. Point of control of reactive power exchanges	Para 12.2.2(vi) of the Detailed Procedure may be	Grant of Stage-I and Stage-II Connectivity	8(2)(28)
	11		à
		lead generator.]	
		Connection Agreement signed with such	

Series and All mining All and Series and Ser	
Wind generators were primarily induction motors	
days of wind generating technology, where the	
reference to voltage was justified in the initial	
(WGS). The reactive energy charges without	
with the voltage at the wind generating station	
lacuna in this pricing is that there is no linkage	
rates for Wind generating stations. The biggest	
charging the reactive power drawls at different	
exchanges connected to ISTS. The state sector is	
Wind) are not charged for reactive power	
As on date the generating stations (including	
2. The present practice in states	
generating stations.	
active power of WGS similar to the conventional	
The PPC will also be carrying out the change in the	
dedicated transmission lines)	
respect of those generators who lay their	
interconnection point is at the utility end (in	
control at their station, even if their	
the conventional generating units are asked to	
The above measure would be identical to the way	
end) in respect of the reactive power exchanges.	
WGS and not at the interconnection point (at ISTS	
the control point need be at the pooling SS of the	
requirements as per IEGC provisions. Therefore	

WGS can help the power system to run with a	
is not charged, as is being done in the states, the	
the system voltage profile. If the reactive energy	
increase of voltage in the system and thus upset	
although they are helping the grid. This causes	
are being charged for reactive energy drawl,	
the pooling SS of WGS. This is done, because they	
any reference to the system voltage at the bus of	
grid or maintaining unity power factor, without	
generators are pumping reactive power to the	
these advancements, the paradox is that the wind	
or reactive power in a smooth manner. With all	
a STATCOM and that makes the adjustment of PF	
generation from each WGU is 20%. Each WGU has	
up to 40% of the rated MW capacity, even when	
capabilities to absorb or generate reactive power	
With the advent in technology, the WGUs have	
occurring in steps.	
to vary the reactive energy drawl, but this was	
in each of the WGU, which used to switch in or out	.38
older wind generating units (WGU) had capacitors	
reactive support, the pricing was essential. The	
during starting. To importune them to provide	
network. These were causing severe voltage dips	
and connected to 33 kV or 11kV of distribution	

		ER-5	CHAPTER-5
		company and vice versa.	
		connectivity granted to the parent	
	parent company and vice versa.	companies shall be allowed to utilize the	
-	be allowed to utilize the connectivity granted to the	Provided further that 100% subsidiary	
	Provided further that 100% subsidiary companies shall		
		under Regulation $2(1)(b)(i)(g)$.	
2	activities under the supervision of the former.	not be applicable to applicants defined	
Hami	2(1)(b)(i)(f), provided the latter undertakes such	Provided that the above provision shall	
	to applicants defined under Regulation 2(1)(b)(i)(g). and		
control as suggested	Provided that the above provision shall not be applicable	other person.	
same needs to be extended to central sector with		associated rights and obligations to any	
developer to several individual owners and the	obligations to any other person.	pledge its connectivity or LTA and the	
state sector from Renewable power park	connectivity or LTA and the associated rights and	A person shall not transfer, assign or	
Transfer of connectivity is possible even now in	A person shall not transfer, assign or pledge its	Transfer of Connectivity and LTA	8A.
is attached as Appendix-1.			
system in southern region. The copy of the report			
recently demonstrated by SRPC in the power			
network The efficacy of such a system was			
each of the WGU through a closed fibre optic			
active and reactive power by giving the signal to			
as PPC (Power plant controller) which can control			
WGS can be done with a special equipment called			
power (power factor) at the pooling substation of			
better voltage profile. The control of reactive			

	(g).	Regulation $2(1)(b)(i)(e)$ and $2(1)(b)(i)(g)$. (g).	
	for applying for LTA for applicants under Regulation 2(1)(b)(i)(e) and 2(1)(b)(i) (f) and 2(1)(b)(i)	for applying for LTA for applicants under	
with proper controls	requisite for applying for LTA for applicants under with proper controls	Connectivity shall not be a pre-requisite	
need be extended to Renewable park developer	Regulation 8, Stage-II Connectivity shall not be a pre-	Clause 2A of Regulation 8, Stage-II	
The provisions extended to generating company	Notwithstanding anything contained in Notwithstanding anything contained in Clause 2A of The provisions extended to generating company	Notwithstanding anything contained in	12(1A)