

Date: 20.09.2022

To,

The Secretary,

3 rd & 4 th Floor, Chanderlok Building, 36,

Janpath, New Delhi – 110001

Subject: ACME Comments on draft CERC Sharing of Inter-State Transmission Charges and Losses) Regulations, 2020 and Supplementary Draft Notification

Respected Sir,

At the outset, we would like to appreciate Hon'ble CERC for bringing much awaited draft CERC Sharing of Inter-State Transmission Charges and Losses) Regulations, 2020

We take this opportunity to introduce ourselves as ACME Cleantech Solutions Pvt. Ltd., popularly referred to as the ACME Group, is one of the leading global sustainable and renewable energy companies having headquarter at Gurugram. ACME Group played a crucial role in bringing down Solar tariffs by nearly half in India after commissioning the project at Bhadla solar power park in Rajasthan. ACME Group built and operated a solar portfolio of over 5 GWp. The Company currently owns and operates over 1.5 GWp of capacity with another 10 GWp under construction. These are spread across 13 states in India and Oman.

With innovation being the forte of ACME Group, it has set up the world's first integrated pilot project for Green Hydrogen and Green Ammonia plant at Bikaner in Rajasthan. In this project, Green Hydrogen is being produced using 5MWp from the solar plant, scalable to 10 MWp. The plant will help in saving approx. 4400 tons/annum of CO2 emissions. This R&D pilot has enriched the Company with knowledge, experience, and learning, which are being utilized in large-scale Green Hydrogen and Green Ammonia plants under development overseas.

We welcome the draft GNA Regulations by Hon'ble CERC as it addresses most of the concern of power sector including RE integration, robust transmission infrastructure planning and

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development etc. However, we feel that some concerns of the power sector and Renewable energy industry needs to be deliberated further in the interest of all stakeholders so that RE projects can be implemented without any bottlenecks.

We hereby submit our comments for your kind consideration.

Yours faithfully,

For and on behalf of ACME Solar Holdings Private Limited.

Tushar Goyal

Authorized Signatory

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ACME Comments on Sharing Regulations

Existing Clause	ACME Suggestions	Rationale
Drawee DIC shall mean the DICs which draw power through ISTS but does not include ESS	Drawee DIC shall mean the DICs which draw power through ISTS but does not include ESS and REGS	REGS draw power for the purposes of meeting their auxiliary requirements and start-up operations which are technical and essential in nature. Also, the quantum is very minuscule. RE generators should be allowed upto 0.5% power of the total rated capacity as auxiliary and start up power and the same shall be allowed to netted off with the export power
11.1. (a) For a generating station, net metered ex-bus injection, in a time block in excess of GNA Provided that for a hydro-generating station, schedules for overload capacity of 10% during peak season shall not be charged under transmission deviation.	11.1. (a) For a generating station, net metered ex-bus injection, in a time block in excess of GNA Provided that for a hydro-generating station, schedules for overload capacity of 10% during peak season shall not be charged under transmission deviation. Provided further that the Solar Generating stations shall be allowed to inject upto 110% of the rated capacity during peak hours of the day (1200-1600 hrs)	Solar Power Projects are capable to generate upto 10% higher than the rated capacity during peak hours of the day owing to higher solar insolation. Such higher generation upto 10% of the rated capacity should be allowed otherwise it will amount to wastage of natural resources.
11.1.c (c) For any drawee DIC, other than those covered under clause (b) of this Regulation, net metered drawal in a time block in excess of the sum of GNA and T-GNA Provided that if a generating station including REGS having GNA, draws through ISTS under T-GNA, the net metered drawal of such generating station in a time block in excess of T-GNA shall	11.1.c (c) For any drawee DIC, other than those covered under clause (b) of this Regulation, net metered drawal in a time block in excess of the sum of GNA and T-GNA Provided that if a generating station including REGS having GNA, draws power for meeting its auxiliary or start up or reactive power support, the net metered drawal of such generating station in a time	Power requirement for auxiliary or start up or reactive power support is technical in nature for the purposes of either running the auxiliary parts of plants or for supporting the grid. In such events, there should not be any Transmission Deviation charges.

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be considered as transmission deviation.	block shall not be considered as transmission deviation and would be netted off with the export power	
<p>12.2.3 (2) Clause (3) of Regulation 13 of the Principal Regulations shall be substituted as under: “(3) Where COD of a Connectivity grantee is delayed from start date of Connectivity in terms of GNA Regulations, and the Associated Transmission System has achieved COD, which is not earlier than such start date of Connectivity, the Connectivity grantee shall pay Yearly Transmission Charges for the Associated Transmission System corresponding to Connectivity capacity which have not achieved COD:</p> <p>Provided that Yearly Transmission Charges in respect of Associated Transmission System corresponding to the Connectivity capacity which 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>12.2.3 (2) Clause (3) of Regulation 13 of the Principal Regulations shall be substituted as under: “(3) Where COD of a Connectivity grantee is delayed from start date of Connectivity in terms of GNA Regulations, and the Associated Transmission System has achieved COD, which is not earlier than such start date of Connectivity, the Connectivity grantee shall pay Yearly Transmission Charges for the Associated Transmission System corresponding to Connectivity capacity which have not achieved COD:</p> <p>Provided that Yearly Transmission Charges in respect of Associated Transmission System corresponding to the Connectivity capacity which 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>Provided that where a Renewable Energy generation capacity which is eligible for ISTS waiver in terms of the extant orders, is granted extension in COD by the competent authority, the commencement or operationalization date and the period of the LTA shall also get extended accordingly commensurate to the revised COD as extended by competent authority and in such</p>	<p>MoP vide its order dated 15.01.2021, 23.11.2021 and 30.11.2021 including the directions issued under section 107 of Electricity Act 2003 to CERC, has notified that in case of extension in COD as granted by competent authority then the LTA commencement/operationalisation date shall get extended commensurate to the revised COD and LTA period shall also get extended.</p> <p>Therefore, we request Hon’ble CERC to adopt the MoP order in true spirit so that the policies of Central Govt remained aligned with CERC Regulations.</p>

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	circumstances, there shall be no liability of transmission charges on the affected party.	
<p>Supplementary Draft Notification</p> <p>4.Clause (1) of Regulation 13 of the Principal Regulations shall be substituted with the provisions as under: “(1) No transmission charges for the use of ISTS shall be levied for the following GNA quantum (GNARE), for scheduling power from (i) REGS or RHGS based on wind or solar sources or (ii) ESS charged with REGS or RHGS based on wind or solar sources:</p> $GNA_{RE} \text{ (in MW)} = GNA \times \sum_{n=1}^T \left(\frac{SDRG_n}{SDTG} \right)$ <p>Where</p> <ul style="list-style-type: none"> • SDRG is drawl schedule (in MW) through ISTS under GNA from entities covered under subclauses (i) and (ii) of this Regulation in nth block. • SDTG is total drawl schedule (in MW) under GNA through ISTS from all sources in nth block • ‘n’ is the nth time block • T is number of time blocks in a month = 96X number of days in a month <p>Provided that in case total drawl schedule (in MW) under GNA through ISTS from all sources, for nth time</p>	<p>4.Clause (1) of Regulation 13 of the Principal Regulations shall be substituted with the provisions as under: “(1) No transmission charges for the use of ISTS shall be levied for the following GNA quantum (GNARE), for scheduling power from (i) REGS or RHGS based on wind or solar sources or (ii) ESS charged with REGS or RHGS.</p> <p>(3) Clauses (1) and (2) of this Regulation shall be applicable for scheduling of power from (i) REGS or RHGS based on wind or solar sources or (ii) ESS charged with REGS or RHGS based on wind or solar sources which have declared commercial operation upto 30.6.2025.</p>	<p>The waiver of transmission charges for RE should be unconditional as ordered by Ministry of Power in its order dated 23.11.2021.</p> <p>The formula suggested by CERC will restrict the waiver of ISTS transmission charges partially for Commercial and Industrial consumers and still majority of the ISTS transmission charges would still be applicable as vanilla solar and wind operate at 25-35% while hybrid projects operated at ~50-60% CUF.</p> <p>Therefore, we request that such conditional waiver should not be provided as it is not aligned with MOP order dated 23.11.2021.</p>

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<p>block, is less than 75% of Maximum schedule corresponding to GNA, the “SDTG” shall be taken as 75% of maximum schedule corresponding to GNA for the nth block.</p> <p>....</p> <p>(3) Clauses (1) and (2) of this Regulation shall be applicable for scheduling of power from (i) REGS or RHGS based on wind or solar sources or (ii) ESS charged with REGS or RHGS based on wind or solar sources which have declared commercial operation upto 30.6.2025.</p>		
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Additional Comments:

A. Green Hydrogen and Green Ammonia Projects

- Central Govt has released Green Hydrogen Policy dated 17.02.2022 wherein waiver on ISTS transmission charges has been provided for a period of 25 years for Green hydrogen and Green Ammonia projects.
- We request that the above provision may be included in Sharing Regulations to align the regulations with Central Govt Policy so that the regulatory certainty remains in these new projects and investors/developers can go ahead with implementing such projects on large scale thereby contributing the RE target of 450 GW by 2030 as set by Government of India.

Yours faithfully,

For and on behalf of **ACME Solar Holdings Private Limited.**

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Authorized Signatory

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