AYANA
RENEWABLE POWER PRIVATE LIMITED

Ref: ARPPL/CERC /2022-2023/01 03rd October 2022

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

Subject: Submission of Comments/Suggestions on "Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2022" on behalf of Ayana Renewable Power Private Limited (ARPPL)

Dear Sir,

Greetings from Ayana Renewable Power Pvt Ltd! (ARPPL)

This is in reference to the Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2022 on 11.06.2022 and subsequently issued Draft Supplementary Amendment proposing additional amendments as part of the Draft Regulations. The last date of inviting comments/objections/suggestions is up to 3.10.2020.

Accordingly, we ARPPL is submitting our comments on the draft which are enclosed as Annexure-1 with this letter.

We humbly request the Hon'ble commission to favorably consider our comments/suggestions while finalizing the Draft Regulations.

Yours sincerely

For Ayana Renewable Power Private Limited

Sharad Ranjan

Authorized Signatory

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Annexure-I

ARPPL Comments on Draft CERC (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022"

Sr No.	Regulation No	Existing Clause	Our Suggestion
1	GNA Regulation dated 07/06/2022 Definition	Renewable Hybrid Generating Station" or "RHGS" means a generating station based on hybrid of two or more renewable source(s) of energy with or without Energy Storage System, connected at the same inter-connection point;	We request hon'ble commission to amend this definition and change it to the connectivity to different interconnection point. Ideally solar and wind rich areas are chosen to develop Hybrid project and it can have different Interconnection points.
2	10 Amendment to Regulation 11 of the Principal Regulations	Transmission charges for GNA for entities located in the State, for the billing month, under first bill (in rupees) X 1.10 / (number of days in a month X 96 X GNA quantum, in MW, for all such entities located in the State considered for billing, for the corresponding billing period.)"	The T-GNA Rates should be calculated based on 100% of the GNA Transmission Charges and not 110% so that it is at par with the GNA rate.
3	(a) Regulation 3(3) has been proposed to be substituted as follows:	"3) Bills for transmission charges shall be raised on the buyer in terms of this clause notwithstanding any provisions in the PPA and the settlement of the transmission charges inter se between the buyer and the generating station or the seller, wherever necessary, shall be made in terms of the PPA or as per the mutual agreement."	We welcome the move of the hon'ble commission on the bifurcation of the transmission charges and its payment by the beneficiaries based on mutual agreement. However, if there is no mutual agreement than its recourse should also be mentioned in the regulation.
3	Amendment to Regulation 13 (1) of the	"(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	From the proposed Regulations 3(3), it is understood that the GNA_{RE} and $T\text{-}GNA_{RE}$ arrived at by using the

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	Principal Regulations	or solar sources or (ii) ESS charged with REGS or RHGS based on wind or solar sources: $$GNA_{RE}(in\ MW) = \frac{GNA \times \sum_{n=1}^{T}\left(\frac{SDR_G}{SDT_G}\right)}{T}$$ Where • 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. Provided that in case total drawl schedule (in MW) under GNA through ISTS from all sources, for nth time 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. (2) No transmission charges for the use of ISTS shall be levied for the following T-GNA quantum, 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:	specified formula shall be reduced from total GNA availed by all DIC's, for computing the per MW transmission charges payable by other GNA beneficiaries. However, the formula specified for computation of GNA_{RE} and T-GNA_{RE} will always result in GNA_{RE} and T-GNA_{RE} being less than the total GNA availed by RE drawee entities. The reason being that the computation of GNA_{RE} and T-GNA_{RE} depends on ratio of two variables i.e. scheduled drawl of RE power and total scheduled drawl (including RE and non RE sources). The scheduled drawl from RE sources will not be uniform and at peak capacity and accordingly, the aforesaid ratio will always result in lower value of GNA_{RE} and T-GNA_{RE}. Accordingly, as per the proposed Regulations, waiver of transmission charges will not be provided to all the beneficiaries of RE sources. However, it is not clear how this waiver will be allotted to the beneficiaries. Further, proviso to Regulation 13(1), mandating total scheduled generator to be equal to more than 75% of maximum scheduled generation will also ensure that the above formula results in lower value of GNARE and T-GNARE as compared to the GNA availed by drawee of

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<table>
<tr><th>Sr No.</th><th>Regulation No</th><th>Existing Clause</th><th>Our Suggestion</th></tr>
<tr><td></td><td></td><td>$$T - GNA_{RE}(in\ MW) = \frac{T - GNA \times \sum_{n=1}^{T}\left(\frac{SDR_{TG}}{SDT_{TG}}\right)}{T}$$
• SDRTG is drawl schedule (in MW) through ISTS under T-GNA from entities covered under subclauses (i) and (ii) of this Regulation in nth block.
• SDTTG is total drawl schedule(in MW) under T-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 or part of the month, as the case may be.
Provided that in case total drawl schedule (in MW) under T-GNA through ISTS from all sources for a time-block, is less than 75% of maximum schedule corresponding to T-GNA for the time-block, the “SDTTG” shall be taken as 75% of maximum schedule corresponding to T-GNA.
Provided further that the reimbursement, from the already paid T-GNA charges, on account of T-GNARE shall be made ex-post on finalization of schedules, by 15th day of the next month.
(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</td><td>RE sources. Following table shows illustration for applicable waiver as per proposed draft Regulations:
<table><tr><td>GNA_{RE}</td><td>38%</td><td></td></tr><tr><td>Maximum Schedule</td><td>75%</td><td></td></tr><tr><td>GNA</td><td>100</td><td>MW</td></tr><tr><td>T</td><td>96</td><td>Time block for one day</td></tr><tr><td>SDR_G</td><td>3159</td><td>MW</td></tr><tr><td>SDT_G</td><td>7649</td><td>MW</td></tr></table>
It can be seen from above table that the rebate will only be available to 38% of the RE capacity. Therefore, it is requested to the Hon’ble Commission to not to link waiver of transmission charges to scheduled energy and provide waiver towards transmission charges to all RE beneficiaries for full capacity irrespective of the scheduled energy.

It is pertinent to point out here that Electricity (Transmission System Planning, Development and Recovery of Inter-State Transmission Charges) Rules, 2021, notified by Ministry of Power mandates to allow</td></tr>
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		which have declared commercial operation upto 30.6.2025.	pass through of any waiver provided by Central Government. We would also like to highlight that presently Ayana and many other IPPs in the country are undertaking RE projects under Open Access, which are under implementation and are at advance stage of commissioning. Waiver of ISTS Transmission charges shall help in propagation of such RE projects. Seeing the waiver towards transmission charges granted by MoP, many developers have made huge investment and many projects are under pipeline. Imposition of ISTS charges on RE Projects at this stage will not only discourage investors sentiments, but it will also lead to waste of scarce resources. Eventually this will have a grave impact on our country's ambitious goal of achieving 175 GW by 2030. In view of above, it is humbly requested to suitably incorporate the provision of waiver of Inter-State Transmission charges to the consumer procuring power through such RE Projects, in accordance with MOP order and Para 6.4 (6) of Tariff Policy, or the

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			Commission may provide waiver in a manner as it may deems fit.
4	Regulation 13(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 the Connectivity capacity which have not achieved COD.	COD of the Project is dependent on many factors and can be extended due to force majeure events as well. If the delayed COD is established or granted through the State or Central bidding agency, the same should be concurred by the CTUIL. We request the hon'ble commission to keep a separate clause apart from the intentional delay where the COD declaration can be revised and that GNA charges should not be levied to the Developer.

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