

**To,**

**The Secretary,**

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

**Janpath, New Delhi – 110001**

**Subject: ACME Comments on draft Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021.**

**Respected Sir,**

At the outset, we would like to appreciate Hon'ble CERC for bringing much awaited draft connectivity and GNA regulations and provide us the opportunity to submit our suggestions/comments on the same.

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. ACME Group had built and operated a solar portfolio of over 5 GWp and significant capacity is under construction.

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 development etc.

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

**ACME Solar Holdings Private Limited  
(Formerly known as ACME Solar Holdings Limited)  
(CIN: U40106DL2015PTC337832)**

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**ACME Comments on GNA**

Existing Clause	ACME Suggestions	Rationale
New clause  <b>Alignment of LTA Commencement/operationalization date and Connectivity effective date with extended COD of Generating station as granted by Government Designated Renewable Implementing Agency</b>	<b>Alignment of LTA Commencement/operationalization date and Connectivity effective date with extended COD of Generating station as granted by Government Designated Renewable Implementing Agency</b>  In case the COD of Generating station is extended by Government designated agencies or state Discom, as the case may be, due to any reason beyond the control of Generating station, then, the Commencement/operationalization date of LTA and Connectivity effective date shall be extended commensurate to the extension granted to such Generating station.	Government of India has set up an ambitious target of 450 GW of RE capacity by 2030 and to achieve such targets, various Government designated agencies i.e. SECI, NTPC, NHPC etc had conducted bids and signed PPA with RE developers. During the project implementation, various RE projects got affected by Force majeure events which were beyond their control and were granted extension in COD by these agencies/state Discom. However, the LTA commencement/operationalization date and Connectivity effective date is not being extended by CTU/PGCIL and there is a mismatch between extended COD and LTA operationalization date. This has a huge impact on RE projects as present regulations are silent on such eventualities. Further CERC in its connectivity procedure has already allowed extension of effective date of connectivity commensurate to the extension granted by procurer.  Therefore, we request hon'ble Commission to address this concern in GNA regulations. This will give regulatory certainty to RE projects and ultimately the target of GOI can be achieved within the time limit.
22.2 (d) Entities covered under Regulation 4.1 and clause (iii)	To be removed	As per present draft GNA regulations, generating stations are responsible for connectivity

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<p>of Regulation 17.1 of these regulations shall furnish one-time GNA charge for Rs. one lakh per MW for the quantum of GNA one month prior to the start date of GNA. In case, such charges are not furnished by the entity within the specified timeline, the same shall be recovered by encashment of Conn BG1, Conn-BG2 and Conn-BG3 as required. The proceeds of such on time GNA charge shall be used for reducing Monthly Transmission Charges under the Sharing Regulations.</p>		<p>while procurers are given the responsibility to avail GNA. Generators are required to pay Conn BG-1, Conn BG-2 and Conn BG-3 for connectivity under these regulations. Since GNA will be availed by procurers and Generators are submitting BG against connectivity, therefore, we request hon'ble CERC to no levy such additional charges to Generators as it will amount to significant increase in tariff.</p>
<p>16.3 In case of non-payment of transmission charges under Regulation 13 of the Sharing Regulations for more than 3 months from the due date, such transmission charges shall be recovered by encashing Conn-BG1 (if subsisting), Conn-BG2 and Conn-BG3, as required. Connectivity shall be revoked from the date when Conn-BG2 is not sufficient to cover transmission charges under Regulation 13 of the Sharing Regulations.</p>	<p>To be removed</p>	<p>Under the present draft, payment of transmission charges is the responsibility of procurer and not generator. Therefore, there is no occasion of payment of transmission charges by Generator.</p> <p>Therefore, we request hon'ble CERC to remove this clause to align it with other provisions of draft regulations.</p>
<p>New Clause</p>	<p>The operationalization of GNA i.e. connectivity under these regulations, for a generating station, shall be two weeks subsequent to the completion of ATS by transmission licensee</p>	<p>There are various procedural compliances that are required to be completed by a Generating station once ATS is completed by the transmission licensee i.e. coordination with NRLDC for synchronization code, other commissioning activities which needs 10-15 days' time for completion. Therefore, we request hon'ble commission to allow two weeks'</p>

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		time subsequent to completion of ATS for LTA operationalization date to commence.
Definitions:  (ah) “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;	Definitions:  (ah) <b>“Co-located Renewable Hybrid Generating Station”</b> 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;	MNRE hybrid guidelines provides multi-substation connectivity for hybrid projects. Therefore, we request hon’ble Commission to align the definition with MNRE guidelines.
4.2. Notwithstanding anything contained in Regulation 4.1, the entities having Connectivity shall be eligible, on payment of application fees, to apply for enhancement of Connectivity of less than 50 MW subject to available capacity in transmission system	4.2. Notwithstanding anything contained in Regulation 4.1, the entities having Connectivity shall be eligible, on payment of application fees, <b>to apply for enhancement of Connectivity for a quantum equivalent upto installed capacity of generating station</b> subject to available capacity in transmission system	If the transmission capacity is available then the generating station should be allowed to enhance its connectivity upto installed capacity so as to optimize its design and project configuration and bring down leveled cost of generation.
6.1 Provided that the existing ISTS for the purpose of this Regulation shall include transmission system which has been awarded for implementation, as on the last day of the month in which application for grant of Connectivity complete in all respects, has been received:  Provided further that if any additional transmission system gets awarded for implementation before completion of interconnection study, such additional transmission system shall also be considered as existing ISTS	6.1 Provided that the existing ISTS for the purpose of this Regulation shall include transmission system <b>which has been approved by MoP</b> , as on the last day of the month in which application for grant of Connectivity complete in all respects, has been received:  Provided further that <b>if any additional transmission system gets approved for implementation before completion of interconnection study</b> , such additional transmission system shall also be considered as existing ISTS	Once a transmission system or scheme is approved by Ministry of Power then it should not fall under ATS as it would not be developed dedicatedly for the applicant who has applied connectivity subsequent to MoP approval.  Therefore, we request hon’ble commission to consider it as existing ISTS and not ATS

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<p>8.3 d) The amount for which Conn-BG2 is to be furnished as per clause (b) of this Regulation, shall be equal to estimated cost of ATS and terminal bay(s) and the timeline for completion of ATS and terminal bay(s) shall be based on the scheduled date of commercial operation for such ATS and terminal bay(s).</p>	<p>8.3 d) The amount for which Conn-BG2 is to be furnished as per clause (b) of this Regulation, shall be equal to estimated cost of ATS <b>in proportion to the quantum for which connectivity is applied by the applicant subject to a maximum of Rs. 2 lakh/MW</b> and terminal bay(s) and the timeline for completion of ATS and terminal bay(s) shall be based on the scheduled date of commercial operation for such ATS and terminal bay(s).</p> <p>Provided that Conn BG-2 and Conn BG-3 shall not be applicable where PPA and PSA are signed or beneficiaries are firmed up.</p>	<p>Conn BG-2 should be in proportion to the connectivity quantum otherwise it will be a huge impact on applicant where there is only one application prior to award/approval of ATS. The Conn BG is for the purpose of security against transmission system which will ensure seriousness and commitment of the developer and not meant for revenue generation.</p> <p>Further, Conn BG-2 and Conn BG-3 should not be applicable where beneficiaries are firmed up as provided under present applicable regulations.</p>
<p><b>16. Treatment of Connectivity Bank Guarantee</b></p> <p>16.2 Conn-BG2 and Conn-BG3 shall be returned in five equal parts over five years corresponding to the generation capacity which has been declared under commercial operation by the Connectivity grantee</p>	<p><b>16. Treatment of Connectivity Bank Guarantee</b></p> <p>16.2 Conn-BG2 and Conn-BG3 shall be returned in five equal parts over five years corresponding to the generation capacity which has been declared under commercial operation by the Connectivity grantee</p> <p>Provided that Conn-BG2 and Conn-BG3 of RE projects shall be returned within one month after achieving COD of the full capacity</p>	<p>RE projects once commissioned starts operating and injecting power and does not require any fuel to operate. Therefore, we request hon'ble commission to consider this exception for RE projects.</p>

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