



**AYANA**  
RENEWABLE POWER PRIVATE LIMITED

Ref: CERC/Ayana/DSM- 01/20211022

24/02/2022

**The Concerned officer**  
**Central Electricity Regulatory Commission**  
**3<sup>rd</sup> & 4<sup>th</sup> Floor, Chanderlok Building,**  
**36, Janpath, New Delhi- 110001**

Email: [rashmi@cercind.gov.in](mailto:rashmi@cercind.gov.in); [secy@cercind.gov.in](mailto:secy@cercind.gov.in)

**Subject: -** Comments on CERC Draft called the Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021.

Sir,

This is with reference to PUBLIC NOTICE dated 16<sup>th</sup> December, 2021, where the Draft Regulation on Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021. was uploaded on the website of CERC. Pls find attached Comments on the Draft Regulation for your kind reference.

We are looking forward for your co-operation.

**For M/s AYANA RENEWABLE POWER PRIVATE LIMITED**

**Authorized Signatory**

**Ayana Renewable Power Private Limited**

**Registered & Corporate Office:**

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**Suggestions / Comments on Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021**

Draft Clause	Comment/Suggestion																		
<p><b>CGNA- Clause 3.7</b></p> <p>If any application for grant of Connectivity or grant of GNA is withdrawn before the in-principle grant of Connectivity in terms of Regulation 7 of these regulations or grant of GNA in terms of Regulation 22 of these regulations, 50% of the application fee shall be forfeited. Balance 50% of the application fee shall be refunded by the Nodal Agency to the Applicant within 15 days of withdrawal of the application:</p> <p>Provided that if any application is withdrawn after the in-principle grant of Connectivity or grant of GNA, such application shall be closed by the Nodal Agency within a period of 15 days from the date of withdrawal and 100% of the application fee shall be forfeited.</p>	<p>Kindly allow the application to be withdrawn before issuance of in-principle connectivity by CTU. Discussions/Deliberations made during the monthly meeting shall not be construed as grant of in-principle connectivity till the letter of in-principle connectivity is issued.</p>																		
<p><b>CGNA -Clause 22.2 (d)</b></p> <p>Entities covered under Regulation 4.1 and clause (iii) 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.</p> <p><b>Read together with EM A(i)</b></p> <p>One-time GNA charge @ Rs. 1 lakh/MW shall be furnished by entities thatshall get Connectivity to ISTS.</p>	<p>Is this clause applicable to the Existing Generating station which has already paid the connectivity charges and obtained the Connectivity?</p> <p>If yes, this should not be applicable to the existing Connectivity holders and that transition to GNA should happen without any commercial impact to the existing Connectivity holders</p>																		
<p><b>EM -Clause 5.2 Quantum of Connectivity</b></p> <table><tr><th>Sr. No.</th><th>Applicant</th><th>Connectivity Quantum</th></tr><tr><td>1</td><td>Generating Stations including REGS</td><td>Equal to Installed Capacity</td></tr><tr><td>2</td><td>Renewable Hybrid Generating Station</td><td>Less than or equal to the installed capacity</td></tr><tr><td>3</td><td>Captive generating plant</td><td>Maximum injection to ISTS</td></tr><tr><td>4</td><td>Standalone ESS (energy storage system)</td><td>Maximum injection to ISTS or proposed maximum drawal from ISTS, whichever is higher</td></tr><tr><td>5</td><td>Renewable Power Park Developer</td><td>Quantum for which it has been authorised by the Central Government or a State Government</td></tr></table>	Sr. No.	Applicant	Connectivity Quantum	1	Generating Stations including REGS	Equal to Installed Capacity	2	Renewable Hybrid Generating Station	Less than or equal to the installed capacity	3	Captive generating plant	Maximum injection to ISTS	4	Standalone ESS (energy storage system)	Maximum injection to ISTS or proposed maximum drawal from ISTS, whichever is higher	5	Renewable Power Park Developer	Quantum for which it has been authorised by the Central Government or a State Government	<p>The regulations shall cover the Connectivity requirements as per the Bids floated by SECI on RTC (Round the Clock) bids and Peak Power Requirement Bids</p>
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<p><b>EM- Clause 5.6</b></p> <p>Connectivity for additional generation capacity within the quantum of Connectivity granted.</p>	<p>In case REGS adds ESS in additional to the granted connectivity capacity, there should be flexibility to allow 5% of the quantum of energy to be</p>																		

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Draft Clause	Comment/Suggestion
	transmitted through the infrastructure
<b>CGNA- Clause 6.2</b> Any augmentation required, excluding terminal bay(s), to the existing ISTS identified under Regulation 6.1 of these regulations, shall be considered as the Associated Transmission System (ATS) for the Applicant(s).	Associated Transmission System should be identified in advance for each of the substation so that the Generators are aware of the additional charges required for the connectivity
<b>EM Clause no 8.1 GNA of States</b> (a) All the State DISCOMs connected to ISTS will be considered as deemed grantee of GNA, and the GNA of a State on the date the 2021 Draft GNA Regulations come into force, shall be based on average of actual ISTS drawal during the last three years as per the proposed formula since the drawal represents the usage of ISTS by the State.	As the Demand of the states are going to go up on the coming years due to multiple reasons, the GNA of the states can be considered on higher side to accommodate and meet the extra demand coming from the other segments
<b>CGNA Clause 8.1</b> Connectivity Bank Guarantee shall be submitted by an Applicant in three parts, Conn-BG1 amounting to Rs. 50 lakhs, and Conn-BG2 and Conn-BG3, as provided in Regulations 8.2 and 8.3 of these regulations.	<p>we request the Hon'ble Commission to kindly re-visit the methodology of allocation of ISTS bay / connectivity based on Bank Guarantee.</p> <p>We propose to remove the requirement of Conn-BG 2 where the PPA signing entity is Central Govt. Entity/ Central Govt. REIA (SECI/NTPC/NHPC) or a State Govt. Entity/ State DISCOM/ Distribution Licensee.</p>

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