



**WIND INDEPENDENT POWER PRODUCERS ASSOCIATION**

Ref: - WIPPA/2021-22/CERC/01

Date: 15.02.2022

**To,**

**Shri Sanoj Kumar Jha**  
**Secretary**  
**Central Electricity Regulatory Commission**  
**3<sup>rd</sup> & 4<sup>th</sup> Floor, Chanderlok Building,**  
**36, Janpath, New Delhi-110001**

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

Respected Sir,

We wish to introduce Wind Independent Power Producers Association (WIPPA), a national level registered body having association of more than 30 Independent Power Producers (IPPs) of capacity around 12,000 MW with asset base of more than Rs. 60,000 Crores and a healthy pipeline in wind energy sector in India through policy advocacy and presenting independent views / suggestions / comments / analysis to various stakeholders at various forums to provide fillip to the sector.

At the outset, we extend our gratitude to hon'ble Central Electricity Regulatory Commission for inviting Comments/Suggestions/Observations on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021. We wish to submit our observations/comments and objections/suggestions as attached herein **Annexure -1**.

We humbly request the hon'ble ministry to favourably consider our comments/suggestion in larger interest of Stakeholders.

Thanking You,

Yours's Sincerely  
For **Wind Independent Power Producers Association**

**President**

Email: [president@wippaindia.in](mailto:president@wippaindia.in)



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**Annexure 1 - Comments /Observations/Suggestion sought by CERC on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021**

<b>Sr. No.</b>	<b>Clause no.</b>	<b>Existing Clause</b>	<b>Revised Clause / New Clause</b>	<b>Rationale</b>
1	2.1 (b)	“Associated Transmission System” or “ATS” for Applicant(s) for Connectivity means the ATS as determined in accordance with Regulation 6 of these regulations;		<p>It is requested that creation of transmission line and additional transmission infrastructure beyond the substations should not be make part of “ATS”, as it would increases the Conn BG II requirement, which need to be furnished by the Applicant as per the provision of Regulation.</p> <p>Instead of ATS, it is requested to make system beyond ISTS pooling Substation as a part of strengthening scheme.</p>
2	2.1 (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;	We request Hon’ble Commission to remove this definition of RHGS or rephrase it as “Co-located Renewable Hybrid Generating Station” or “CRHGS”	<p>As per MNRE bidding Guidelines for procurement of power from Grid Connected Wind Solar Hybrid Projects, the wind and solar components of Hybrid project can be deployed at same or multiple locations subject to minimum injection capacity as 50 MW.</p> <p>We understand that the purpose of defining RHGS under GNA regulations is limited to the extent of Co-located hybrid projects.</p> <p>Therefore, we request Hon’ble Commission to either rephrase it as suggested here or remove it so that definition of Hybrid projects remain aligned with Central Government guidelines.</p>



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<b>Provisions related to Clause 4 - Eligibility for Connectivity to ISTS</b>				
3	4.1 (E)	REGS or standalone ESS with an installed capacity of <b>5 MW and above</b> applying for grant of Connectivity to ISTS through the electrical system of a generating station already having Connectivity to ISTS:  Provided that such an entity applying for grant of Connectivity to ISTS has an agreement with the <b><u>said generating station to share its electrical system</u></b> and dedicated transmission lines, if any	REGS or standalone ESS with an installed capacity of <b><u>1 MW and above</u></b> applying for grant of Connectivity to ISTS through the electrical system of a generating station already having Connectivity to ISTS:  Provided that such an entity applying for grant of Connectivity to ISTS has an agreement with the <b><u>said generating station / ESS to share its electrical system</u></b> and dedicated transmission lines, if any	The draft regulations allowed connectivity for the capacity of 5 MW or above for REGS or standalone ESS with an existing electrical system to promote RE / Storage in the system. Since the above connectivity is associated with existing electrical system and REGS / ESS, it is our suggestion to allow projects for lesser capacity and suggested to consider it from 1 MW and above instead of 5 MW or above.  Slight modification is desired, as in few instances, REGS/RGHS/Generating Station may also ask for Grid Connectivity with electrical system of Standalone Energy Storage system.  In such scenario, agreement between ESS and REGS/RGHS/Generating Station are required to be executed and provided to CTU for grant of Connectivity.
4	4.1 (f)	New Incorporation under Connectivity applicant category	(f) Bulk Consumer with a contracted capacity of 50 MW and above individually or aggregating 50 MW through same group of companies, one such consumer can function as lead consumer.	Bulk Consumers are required to be included in the applicant list for Connectivity.  It is to be noted that Regulation has included Bulk Consumer under GNA category list, but not included in Clause 4.1, though, clause 12.5 necessitate the requirement of Grid Connection for Bulk Consumer with ISTS network.



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				<p>Additionally, Explanatory Memorandum has clarified with the reason that GNA implicitly contains Connectivity itself. It is to be noted that Bulk consumers are required to be furnish various details, such as type of load, connection details, contracted demand, voltage level for physical connection at which connectivity is desired etc. As, these details are necessary for interconnection, Hence, it is requested that Connectivity must be kept for bulk consumers too, though BG requirements and connectivity related charges may be exempted.</p> <p>Additionally, it is requested that individual consumer having less than 50 MW load, but aggregately, through group of consumers under same group of companies, having load more than or equal to 50 MW, should be made eligible for ISTS Grid connection.</p>
5	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	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 of up to 25% of capacity for which connectivity is granted to such entity subject to available capacity in transmission system</b>	



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6	4.4	Additional Clause Insertion	Notwithstanding anything contained in Clause 4.1, grant of grid connectivity through Lead Generator/ Lead ESS may also be permitted with allocation of additional terminal bay at ISTS substation to Lead generator/Lead ESS and Lead generator shall also be allowed to enhance its internal electrical system including dedicated transmission line to accommodate enhanced grid connectivity.	While applying connectivity, there may be requirement of strengthening of internal electrical system/dedicated transmission infrastructure including terminal bay at ISTS S/S. Therefore, while sharing the connectivity through Lead ESS/ Lead REGS, there may be situation when internal strengthening / <b><u>allocation of additional bay</u></b> by CTU may be required.  In view of above, it is requested to be permitted.
<b>Provisions related to Clause 5- Application for Grant of Connectivity</b>				
7	5.1	An Applicant, which is a generating station including REGS, shall apply for grant of Connectivity to the Nodal Agency for the quantum equal to the installed capacity of the generating station	An Applicant, which is a generating station including REGS, shall apply for grant of Connectivity to the Nodal Agency for the quantum equal to the installed capacity of the generating station  <b>Provided that if such an Applicant is a REGS based on a renewable source of energy with Energy Storage System, it may apply for grant of Connectivity for a quantum less than or equal to the installed capacity.</b>	Definition of Renewable Energy Generating Station includes both RE sources integrated with and without energy storage solutions. While system without ESS requires connectivity to the extent of Installed capacity, systems with ESS at few instances may not require connectivity for the whole installed capacity, during such instances, part of the generation may get stored during peak generation for utilization at later stage, depending on the application. Similarly, there may be cases, where Renewable sources integrated with ESS injects into grid for less quantum than installed capacity.  In most of cases, injection into grid would be a function of Renewable installed capacity and capacity of Energy Storage Solution.



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				<p>Illustration for Solar Projects integrated with ESS are as under:</p> <p>Installed capacity of Solar – 2500 MW Installed capacity of ESS – 1000 MW/4000 MWh As per current clause, such applicant must apply for Connectivity for quantum equal to 3500 MW, though, the injection into grid depends upon the type of contract from the projects (It could be peak hour supply from RE sources or Renewable Energy – Round the Clock supply). Flexibility must be given to applicant to choose the quantum of outflow from the projects.</p> <p>Moreover, such provision is already available for RHGS.</p> <p>This optimization in connectivity quantum would further help to optimize the subsequent transmission capacity needs to be developed. In view of same, it is requested to suitably amend the Clause to incorporate the desired changes.</p>
8	5.2	Notwithstanding anything contained in Regulation 5.1, a generating station, with prior approval of CTU, shall be eligible to add, within the quantum of	Notwithstanding anything contained in Regulation 5.1, a generating station, with prior <b>approval intimation</b> to CTU, shall be eligible to add, within the quantum of Connectivity granted to it, additional	It is requested that provisions related to information shall have to be kept instead of approval as long as outflow shall remain same.



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		Connectivity granted to it, additional generation capacity, including ESS, and for this purpose, the generating station shall apply to CTU, along with non-refundable application fee of Rs 3 lakh along with applicable taxes;	generation capacity, including ESS, and for this purpose, the generating station shall <b>apply inform</b> to CTU, <del>along with non-refundable application fee of Rs 3 lakh</del> <b>along with applicable taxes;</b>  <b>CTU must provide approval in a time bound manner, i.e. within 30 days from the date of intimation</b>	If a generating company wishes to add additional generation capacity not exceeding the granted connectivity, then there should not be the requirement of submitting additional application fees. Since, there are no requirement of system enhancement or additional system studies as the connectivity quantum remains unchanged.  Timeline bound approval from CTU required to be mentioned in the clause, so that generating plant can plan the execution accordingly.
	5.3	An Applicant, which is a captive generating plant, shall apply for grant of Connectivity for a quantum of its proposed maximum injection to ISTS.	An Applicant, which is a captive generating plant, shall apply for grant of Connectivity for a quantum of its proposed maximum injection to ISTS or <b>for a quantum equal to the installed capacity of the generating station.</b>	In this regard we would like to submit that the different treatment has been given to Captive Generating Plants as compared to other REGS, as the connectivity to Captive Generators will be granted on the basis a quantum of its proposed maximum injection to ISTS however for REGS it shall be based on the quantum equal to the installed capacity of the generating station. The Hon'ble Commission cannot discriminate between captive Generating Plant and REGS as far as capacity for connectivity is concerned. Hence, we request you consider amendment proposed by us.
9	Additional provision insertion under Clause 5.6		Provided further that enhancement in internal transmission system including dedicated transmission line and additional terminal bay may be required for this	It also includes of such cases, wherein strengthening of dedicated transmission line or addition in dedicated line and terminal bay at ISTS S/s is required to cater the increased quantum in connectivity due to new



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			purpose and same shall permitted under current provision.	application on the electrical system of already connectivity grantee.
10	5.8	(vi) The application for grant of Connectivity shall contain, inter alia, the following details, as applicable, duly supported with relevant affidavit, as stipulated in the Detailed Procedure for Connectivity and GNA issued in accordance with Regulation 39.1: ..... vi) Registration Number along with certificate issued by the CEA Registry	The application for grant of Connectivity shall contain, inter alia, the following details, as applicable, duly supported with relevant affidavit, as stipulated in the Detailed Procedure for Connectivity and GNA issued in accordance with Regulation 39.1: ..... <del>vi) Registration Number along with certificate issued by the CEA Registry</del>	It is requested to remove condition related to submission of “ <b>Registration Number along with certificate issued by the CEA Registry</b> ” at the time of for application of GNA.  The submission of application is an initial stage process with an objective to secure connectivity at the earliest. In the proposed requirement, developer will be dependent on the third part (CEA) to get registration number & certificate for submission of application, which may delay the application process of developer. In view of that request to remove such condition at the time of application for connectivity. CTU may ask such information at the time of signing of Connectivity Agreement in later stage.
11	Clause 5.9 (New Clause)	Insertion of Additional Clause	The Applicants who have been granted Connectivity to ISTS for the generation projects based on particular renewable energy source(s) or ESS may, for the same capacity of connectivity granted, change to another renewable energy source(s) / or ESS in part or full, under intimation to CTU. In such cases, CTU shall incorporate the necessary change in connection agreement.	It is highly recommended that flexibility has to be provided to developer to change the source after grant of connectivity, with proper intimation to CTU. In case of generating station including REGS and ESS which has already been granted connectivity shall have flexibility to change source as long as the total quantum of connectivity shall remain unchanged.



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			This may also be granted while processing of application.	
<b>Provisions related to Clause 6- Interconnection Study by the Nodal Agency and ATS</b>				
12	6.1	<p>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:</p> <p>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</p>	Existing ISTS: The system commissioned till the last date of the month in which entity submit its application- This will make entire system as ATS and accordingly BG will be apportioned between all the applicants.	There should not be any difference between existing system or ATS as in both cases, applicant would require/utilise transmission infrastructure for evacuation of power. Further, it would not be fair or equitable to seek BG equivalent to cost of ATS from an applicant who seeks connectivity just before award of transmission system while other applicant who may apply for connectivity subsequent to award would require to give BG of only Rs. 2 lakh/MW.
13	6.2	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).	Any augmentation required, <b>excluding common Transmission System</b> and 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).	ATS for the applicant should be exclusive of the common transmission system.



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<b>Provisions related to Clause 7- In-principle Grant of Connectivity by the Nodal Agency</b>				
15	7.2	In case the Nodal Agency, after the interconnection study undertaken in accordance with Regulation 6.1 of these regulations, determines that ATS is required, the Nodal Agency shall intimate in-principle grant of Connectivity to the Applicant within 60 days from the last day of the month in which the application had been received:	In case the Nodal Agency, after the interconnection study undertaken in accordance with Regulation 6.1 of these regulations, determines that ATS is required, the Nodal Agency shall intimate in-principle grant of Connectivity to the Applicant within <b>30 days</b> from the last day of the month in which the application had been received:	The nodal agency will be able to get information within 30 days from interconnection study regarding requirement of ATS or Not in the proposed application. The nodal agency will provide in-principle connectivity within 30 days, in case no ATS is required. However, in case ATS is required, the Nodal agency will provide In-principle grant of connectivity after 60 days with an estimated cost & other details. Since, Nodal agency will be in a position to get update on ATS within 30 days, it is our request to allow In-principle grant of connectivity within 30 days so that developer may be able to work out on further project activities.
16		..... Provided that intimation for in-principle grant of Connectivity shall include the ATS and terminal bay(s), estimated cost of such ATS and terminal bay(s), minimum design features for dedicated transmission lines to be constructed by the Applicant and the likely date of start of Connectivity:	..... Provided that intimation for in-principle grant of Connectivity shall include the ATS & terminal bay(s), BG amount of Rs. ---/MW <del>estimated cost of such ATS and terminal bay(s)</del> , minimum design features for dedicated transmission lines to be constructed by the Applicant and the likely date of start of Connectivity:	In case of ATS, the regulation should provide a standard amount on per MW basis for submission of BG instead of estimated amount to be determined in 60 days. The objective of BG for ATS is only to get certainty / seriousness from developer as regulation has provision to return the same after a certain period of Commissioning.  In view of above request to provide a fix / standard amount for BG on per MW basis for ATS so that developer will also get certainty in advance in term of expenses towards BG and helpful to consider the same at the time of bidding.



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<b>Provisions related to Clause 8- Connectivity Bank Guarantee</b>				
17	Clause 8	<p>Connectivity bank Guarantee:</p> <p><b>BG required without Associated Transmission System (ATS):</b></p> <ul style="list-style-type: none"> <li>● Conn-BG-1: Rs. 50 lakhs</li> <li>● Conn- BG-2: <ul style="list-style-type: none"> <li>○ 132 kV – Rs. 2 Cr.</li> <li>○ 220 kV – Rs. 3 Cr.</li> <li>○ 400 kV – Rs. 6 Cr.</li> <li>○ 765 kV – Rs. 12 Cr.</li> </ul> </li> <li>●Conn BG – 3: Rs. 2 Lakh/ MW</li> </ul> <p><b>BG requirement with Associated Transmission System (ATS):</b></p> <ul style="list-style-type: none"> <li>●Conn – BG -1: Rs. 50 Lakhs</li> <li>●Conn – BG – 2: Estimated Cost for ATS.</li> </ul>	<p>Connectivity bank Guarantee: <b>For exiting connectivity</b></p> <p><b>BG required without Associated Transmission System (ATS):</b></p> <ul style="list-style-type: none"> <li>●<del>Conn-BG-1: Rs. 50 lakhs</del></li> <li>● Conn- BG-2: <ul style="list-style-type: none"> <li>○ 132 kV – Rs. 2 Cr.</li> <li>○ 220 kV – Rs. 3 Cr.</li> <li>○ 400 kV – Rs. 6 Cr.</li> <li>○ 765 kV – Rs. 12 Cr.</li> </ul> </li> <li>●<del>Conn BG – 3: Rs. 2 Lakh/ MW</del></li> </ul> <p><del><b>BG requirement with Associated Transmission System (ATS):</b></del></p> <ul style="list-style-type: none"> <li>●<del>Conn – BG -1: Rs. 50 Lakhs</del></li> <li>●<del>Conn – BG – 2: Estimated Cost for ATS.</del></li> </ul>	<p>The treatment of existing connectivity is same inline of new applicants and have to submit all requisite BGs.</p> <p>We understand that BG’s requirement is for certainty of commissioning of projects as well as seriousness. However, if developer has secured connectivity, it means either they have LoA from bidding agency OR secured land. In both case developer has made commitment to develop project in term of BG submitted in bidding agency OR investment equity in land.</p> <p>The projects having PPA / LOA are required to be exempted from the burden of BG submission, as these projects have PPA/LOA and in advance stage of development.</p> <p>Hence, projects already having connectivity under PPA/LOA OR Land route, are required to be exempted from Conn BG 2 (ATS BG) and Conn BG 3 for Projects granted connectivity.</p>
18	8.3	(b) The Nodal Agency, <b>within 6 (six) months of furnishing of Conn-BG1</b> as per clause (a) of this Regulation, shall intimate to such	(b) The Nodal Agency, <b>within 1 (one) months of furnishing of Conn-BG1</b> as per clause (a) of this Regulation, shall intimate to such entity, (i) amount of Conn-BG2 to be	In the current timelines <b>final grant of Connectivity takes 9-10 months in case of ATS requirement.</b> This is not in alignment with RE projects, which by



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		entity, (i) amount of Conn-BG2 to be furnished towards ATS and terminal bay(s), which shall not exceed the estimated cost intimated under Regulation 7.2 of these regulations, (ii) the timeline for completion of ATS and terminal bay(s), and (iii) firm date of start of Connectivity:	furnished towards ATS and terminal bay(s), which shall not exceed the estimated cost intimated under Regulation 7.2 of these regulations, (ii) the timeline for completion of ATS and terminal bay(s), and (iii) firm date of start of Connectivity, <b>which shall not exceed 18 months from date of application unless the date from which connectivity sought is later:</b>	<p>themselves will be required to be commissioning by 18 months.</p> <p>Therefore, the timelines need to be shortened. Nodal agency, in co-ordination with CEA, may do system studies in advance based on the expected generation and demand centers. They should not wait till the applications are made.</p> <p>In view the above, timeline under clause 8.3 (b) shall be reduced to 1 (one) month so that overall timeline for final grant of connectivity is reduced to 4-5 months.</p> <p>Also, the draft regulations didn't stipulate the maximum timeline for firm date of start of connectivity. This may please be restricted to 18 months from the date of application unless the applicant sought it from a later date.</p>
<b>Provisions related to Clause 10- Connectivity Agreement</b>				
19	Clause 10.1	An entity which has been intimated the final grant of Connectivity, <b>shall furnish technical connection data, inter alia, generator data for fault studies, dynamic simulation data, details of data and voice communication, to the</b>		It is requested that connection details such as technical connection data, inter-alia, generator data for fault studies, dynamic simulation data, details of data and voice communication must make part of Conn 5 & 6. Instead of asking upfront at the time of connectivity agreement, such studies and details must be asked in



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		<b>Nodal Agency as stipulated in the Detailed Procedure for Connectivity and GNA issued in accordance with Regulation 39.1.</b>		later stage, before 1- 2 months of physical connection as current practise.
20	10.5	Where Connectivity is granted at a proposed ISTS sub-station, the Nodal Agency, shall confirm the final coordinates within 2 months of signing of the Connectivity Agreement and such coordinates shall not be outside the radius of 5 km of the tentative coordinates already intimated.		Request CERC to keep the option to developers to withdraw their application if the final location proposed is not acceptable. In that case, CTU to return BGs submitted without any penalty.
21	10.6	Provided that where no construction of ATS or terminal bays has been awarded for implementation, Conn-BG2 shall be returned within a month of such revocation.	Provided that where no construction of ATS and/or terminal bays has been awarded for implementation, <b>Conn-BG2 and Conn-BG3 shall be returned within a month of such revocation.</b>	Conn BG 3 should also be returned to the entities if terminal bays are not awarded.
22	10.7 & 16.3	10.7. The Connectivity Agreement, inter alia, shall include the following and other details as may be stipulated in the Detailed Procedure (c) Provision that in case of non-payment of transmission charges under Regulation 13 of the Sharing	<b>To be removed.</b>	Connectivity grantee under regulation 8 of these regulations are already furnishing Conn BGs and procurers are made eligible for availing GNA. Further, the concept of GNA is to made liable Generating stations for the cost of ATS or terminal bay made by licensee while transmission charges for GNA shall be borne by procurer. In case of any default in terms of connectivity by entities covered under Reg 4.1 of these regulations



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		<p>Regulations for more than 3 months from the due date, the same may be recovered by encashing Conn-BG1, Conn-BG2 and Conn-BG3, as required as per provision of Regulation 16.3 of these regulations</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>then CTU can encash the Conn BGs submitted by such entities to recover the cost of ATS. Therefore, there is no occasion for recovery of transmission charges from Generating stations as their BGs will be encashed in case of default and procurer can still avail power towards such GNA from some other mode.</p> <p>In view of the above, we request Hon'ble Commission to remove this provision so that the objective of GNA regulations can be aligned.</p>
<b>Provisions related to Clause 12- Dedicated Transmission line and bays</b>				
23	12.4	<p>Provided also that in such case of revocation of Connectivity, the Connectivity grantee shall dismantle the terminal bay within 3</p>	<p>12.4 Provided also that in such case of revocation of Connectivity, <del>the Connectivity grantee shall dismantle the</del></p>	<p>Dismantling of a Bay is not the most optimum solution. CTU should open that Bay for other interested applicant and in case connectivity is granted, the CTU determined cost of Bay should be reimbursed to the initial grantee.</p>



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		months failing which the CTU may utilise the bay for some other Connectivity applicant.	<del>terminal bay within 3 months failing which</del> the CTU may utilise the bay for some other applicant. <b>If connectivity is granted to a New applicant, then new applicant will reimburse the cost of constructing the bay to original applicant within 1 month of signing the connectivity agreement with CTU.</b>	
24	12.5	In case of an entity covered under Regulation 17.1(iii), the line to connect such an entity to the ISTS and necessary augmentation for providing connection to the ISTS, shall be constructed and maintained by <u>a licensee</u> at the cost of such entity;	In case of an entity covered under Regulation 17.1(iii), the line to connect such an entity to the ISTS and necessary augmentation for providing connection to the ISTS, shall be constructed, and maintained by <b>any ISTS transmission licensee</b> at the cost of such entity.	Hon'ble Commission in its order dated 05.01.2022 in petition number 124/MP/2021 has allowed Petitioner to approach either PGCIL or any other licensee to construct DTL at the cost of Petitioner. The entity should also be given option to take transmission license and form DTL.
<b>Provisions related to Clause 15.3- Transfer of Connectivity</b>				
25	Clause 15.3	Any person which acquires 51% or more shareholding of the company or its <b>subsidiary or affiliate</b> company owning REGS or part thereof in terms of Regulation 15.2, may after COD of such part, apply to the Nodal Agency for transfer of Connectivity.....	Any person which acquires 51% or more shareholding of the company or its subsidiary or affiliate company owning REGS or part thereof in terms of Regulation 15.2, <del>may after COD of such part</del> , apply to the Nodal Agency for transfer of Connectivity.....	The regulation 15.1 of draft is allowing to split its Connectivity in parts, after COD of such part capacity. However, in the case of Group captive structure, developer may have to split connectivity in initial phase for equity infusion in separate SPVs. In view of that request to allow split / transfer of connectivity before commissioning of project for the name of person / company which acquires 51% or more shareholding of



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				the company or its subsidiary or affiliate company owning REGS or part.
26	Clause 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.	Conn-BG2 and Conn-BG3 shall be returned <b><u>within 30 days from the date of commissioning</u></b> of corresponding generation capacity, which has been declared under commercial operation by the Connectivity grantee.	We request that BG should be returned just after commissioning of the projects, keeping BG for 5 years may hindered the smooth operation of Business.
27	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.	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.  <b>Provided that any extension granted from bidding agency / RE implementation agency will also provide a liberty to generator to revise connectivity date till revised SCOD.</b>	The application of connectivity is an initial exercise to be done after securing project from bidding agency, wherein generator will consider date of connectivity in line of SCOD linked with LoA or PPA. However, there are various Force Majeure events, which provide a relaxation to developer to get an extension of SCOD as the IPP has no control on the FM events. In several cases, the substation where plant needs to be connected is delayed and IPPs are not in a position to commission project on time. In such cases, bidding agencies provide suitable extension after a proper examination of documentary proof OR based on orders issued from Ministry related to respective Force Majeure event.  One side IPPs are getting extension and other side said regulation is not permitting to revise connectivity date



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				<p>and applicant is liable to pay transmission charges for mismatch timeline.</p> <p>In view of above, request to allow revision of connectivity date, if any extension granted from bidding agency / RE implementation to generator.</p>
28	22.2 (a)	Connectivity grantees covered under Regulation 4.1 of these regulations shall be deemed to have been granted GNA, equal to the quantum of Connectivity from the start date of Connectivity.....	Connectivity grantees covered under Regulation 4.1 of these regulations shall be deemed to have been granted GNA, equal to the quantum of Connectivity from the start date of Connectivity. However, option regarding <b>start date of GNA</b> would be given to those connectivity grantees who already have been granted Stage II connectivity and have not applied for LTA. Options include the start date of GNA would vary between <b>0 to 15 months from the start date of connectivity as opted by the connectivity grantee.....</b>	<p>There will be a scenario wherein Stage II connectivity has been granted and due to certain reasons including COVID, LTA has not been applied.</p> <p>Moreover, entities are strategizing the projects based on the current connectivity regulations and procedures and now there would be entire change of regime.</p> <p>In view of the above, it is requested that option to select (0-15 months) the start date of GNA would be provided to the connectivity grantees.</p>
29	22.2 (D)	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.	<del>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.</del>	<p>We request that such entities covered under clause 4.2 and 17.1 (III) should not have to pay one-time GNA, instead, such charges have to make part of pooled system.</p> <p>Additionally, there is no rationale mentioned in Explanatory Memorandum for such requirement.</p>



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Sr. No.	Clause no.	Existing Clause	Revised Clause / New Clause	Rationale
<b>Provisions related to Clause 23 - Use of GNA by other GNA grantee(s)</b>				
30	23.1	An entity covered under Regulation 17.1 which is a GNA grantee, may authorise other entities covered under Regulation 17.1 which are GNA grantee(s), to use its GNA, in full or in part, with prior approval of the Nodal Agency, for a period not exceeding 1 (one) year at a time on mutually agreed terms and conditions	We request Hon'ble Commission to clarify whether GNA grantee located in region A can authorise other entities located in different regions i.e region B or C, to use its GNA or can only authorise entity of same region to use its GNA.	In the workshop conducted by CERC, it was communicated that transfer of GNA between the entities will be allowed within the same region. We request Hon'ble Commission to capture the same in the regulation.
<b>Provisions related to Clause 26- Eligibility for Temporary GNA</b>				
31		As buyers, (i) Distribution licensee directly connected to ISTS;	As buyers, (i) Distribution licensee directly connected to ISTS <b>and Connected through State Transmission Utility;</b>	There may be instances, wherein Distribution Utility connected with STU network may seek T-GNA. To fulfill such conditions, they are required to make eligible for T-GNA under this clause.
32	26.1	(iv) Generating station including Renewable Energy Generating Station for meeting its auxiliary consumption or start-up power or for meeting its supply obligations in terms of clause (3) of Regulation 6 of the Power Market Regulations	Generating station including Renewable Energy Generating Station for meeting its auxiliary consumption or start-up power <del>or for meeting its supply obligations in terms of clause (3) of Regulation 6 of the Power Market Regulations</del>	Under GNA regime, procurer can source power from any contracts/mode upto the limit of GNA. Therefore, In case of any forced outage of generating station, the supply obligations can be meet by sourcing power from any other source i.e. bilateral or Collective (RTM etc) in the GNA limit of the respective buyer and there is no need for Generating station to avail T-GNA.  Therefore, we request Hon'ble Commission to modify the regulation as suggested herein



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<b>Sr. No.</b>	<b>Clause no.</b>	<b>Existing Clause</b>	<b>Revised Clause / New Clause</b>	<b>Rationale</b>
33	New Clause to be inserted after clause 26.1 (C)		Generating Station / ESS for part connectivity granted with ATS, till the ATS comes into operation.	<p>In accordance with the Draft regulation 26.1, T-GNA propose to be granted to buyer/Trading Licensee/Power Exchanges, we suggest that the T-GNA should also be allowed to be granted to generating stations/ESS. The rationale behind our suggestion is as under:</p> <p>For e.g.: - 1000 MW generator applied for connectivity, after system studies, it is found that 500 MW can be injected into existing system and rest 500 MW, there would be requirement of ATS, which may take sizable time to come into operation. In such case, we suggest that 1000 MW connectivity shall be allowed and 500 MW GNA to be allowed immediately and rest 500 MW can be allowed with the commissioning of such ATS. Such 1000 MW generator should be allowed to grant T-GNA till such period.</p> <p>Additionally, while interconnection study as per clause 6, ATS requirement may be assessed, Such ATS may not be at immediate connectivity pooling point, but at beyond the pooling point. Now it may be possible that immediate connectivity may be feasible, but as ATS beyond pooling substation is required, and due to this reason connectivity will not be effective and hence, CTU will not allow interconnection till ATS beyond pooling</p>



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				station gets implemented. In view of above, we request you to grant immediate connectivity during such scenario and so that power can flow under T-GNA.
<b>Provisions related to Clause 32- Revision of T-GNA</b>				
34	32.1 & 32.2	32.1. T-GNA granted under Exigency application category or under Advance application category for a period not exceeding one month cannot be revised 32.2. T-GNA granted under Advance application category for a period of more than one month may be reduced for the balance period with a prior notice of one (1) month by the T-GNA grantee: Provided that applicable T-GNA charges for the quantum of T-GNA granted shall be payable for the notice period of one (1) month	32. Revision of T-GNA 32.1. T-GNA granted under Exigency application category <del>or under Advance application category for a period not exceeding one month</del> cannot be revised 32.2. T-GNA granted under Advance application category for a period of <b>more than 02 days may be reduced for the balance period with a prior notice of one (02) days by the T-GNA grantee</b> <b>Provided that applicable T-GNA charges for the quantum of T-GNA granted shall be payable for the notice period of one 02 days</b>	T-GNA under Advance application should be allowed to revise with a prior notice period of 02 days as such corridor can be allotted to other T-GNA grantees under Exigency application after 02 days' time period. Existing regulation also provides option to STOA grantee to avail downward revision provision after a period of 02 days time period.  Therefore, we request Hon'ble commission to keep the provision as it is for Advance T-GNA applications.
<b>Provisions related to Clause 37- Arrangements for Transition</b>				
35	37.6	If Connectivity granted in accordance with the Connectivity Regulations is effective and Long term Access has either not been granted for any capacity or has been granted for full/part capacity which has become effective as on the date	If Connectivity granted in accordance with the Connectivity Regulations is effective and Long term Access has either not been granted for any capacity or has been granted for full/part capacity which has become effective as on the date of coming	As per regulations 4.1 and 17.1 of GNA regulations, generating stations and Buyers are required/eligible to avail connectivity and GNA respectively. Therefore, any entity whose connectivity has been made effective would mean that such entity is generating station and not buyer thereby falling under regulation 4.1 of these regulations. Hence, such generating stations



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		of coming into effect of these Regulations, the following shall apply: (1) Entities covered under Regulation 4.1 of these regulations, which have not been granted Long Term Access for any capacity or granted Long term access for part of the capacity qua the Connectivity quantum under the Connectivity Regulations, may apply for additional GNA for balance quantum of Connectivity under Regulation 17.2 of these regulations. The same shall be processed by the Nodal Agency as under	into effect of these Regulations, the following shall apply: (1) Entities covered under Regulation 4.1 of these regulations, which have not been granted Long Term Access for any capacity or granted Long term access for part of the capacity qua the Connectivity quantum under the Connectivity Regulations, <b>need not apply for GNA and would be required to furnish Conn BG as per Regulation 8</b>	should not be asked to take GNA in case LTA is not granted for partial or full capacity as it would be availed by procurers under regulation 17.1 of these regulations.
36	Clause 38, Arrangement of Transition (Additional insertion under clause 38)	Regarding Stage I connectivity grantee	Priority to be given to Stage I connectivity grantees	Most of the entities are under different stages of conceptualization of their power projects and already have invested a lot by obtaining Stage I connectivity under the current connectivity regulations and procedures issued by the Hon'ble Commission.  Therefore, it is requested to provide priority to those entities while granting connectivity under this regulation, as this regulation has been devised to award connectivity based on Installed capacity and not based on LOA/PPA. Similarly, the Stage I connectivity under



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				<p>current regulation is being awarded based on Installed Capacity.</p> <p>We understand that Draft GNA has proposed the concept of providing Grid Connectivity based on Installed Capacity and other requirements such as PPA/LOA have been gone away, while coming in to force of this regulation.</p> <p>In previous regime, Connectivity have been provided to RE developers in two stages, in 1<sup>st</sup> Stage connectivity have been provided based on installed capacity and subsequently, Stage II connectivity have been provided based on LOA/PPA.</p> <p>In the draft GNA, transition of connectivity, LTA, and MTOA have been explained, whereas, it has not been clarified that how transition of Stage I connectivity grantee will take place, as these Stage I grantees have already paid Grid connectivity fee to obtain Grid Connectivity.</p>
37	Clause 40.1	The transmission charges and losses for use of the inter-State transmission system shall be shared among <b>buying entities</b> of ISTS in accordance with the Sharing Regulations.	The transmission charges and losses for use of the inter-State transmission system shall be shared among <b>consuming entities</b> of ISTS in accordance with the Sharing Regulations.	However, during workshop conducted by CERC on Draft GNA dated 3 <sup>rd</sup> Feb 2022, it has been clarified that Storage projects, during charging should not be counted as consuming entity. further, we are raising the written clarification for the same.



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				<p>It is to be noted that in case of Standalone storage projects draw power and supply the same in different hours to ultimate buying entity.</p> <p>Transmission charges for the same must be borne by ultimate buying entity.</p> <p>We would like to draw your kind attention towards situation, wherein Standalone Storage stores energy to deliver the same in other time period, it may be interpreted by other stakeholders that Standalone Storage is buying power to deliver the same in other time block, whereas, Standalone Storage is only performing function of energy shift.</p> <p>Hence, we request you to clarify that Standalone Storage should not have to be borne transmission charges in such scenarios.</p>
<b>OTHER ADDITIONAL COMMENTS</b>				
38		Provision related to updated data of existing & upcoming Sub-station		In case of ATS, the generator has to take additional risk of BG amount as well as timeline of sub-station. In such circumstance, it may difficult for generator to participate in bid due to uncertainty and may also face challenges to execute project on time. Therefore, we request for an additional provision for Nodal agency to provide updated data of existing & upcoming Sub-



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				station (require ATS or not) on monthly basis in it's website.
39		Priority for existing connectivity holder		The regulation is converting all granted connectivity inline of GNA provisions. There are various cases, where developer has secured connectivity based on existing mechanism. In such scenario, we request to provide a clarification that 1 <sup>st</sup> priority must be given for existing connectivity holder to convert connectivity within 30 days in line of GNA Regulations.
40		General Comments		Con BG-3 of Rs 2 lakh /MW required towards connectivity of surplus capacity in <b>existing transmission system</b> . Information about the Existing and Proposed evacuation system should be updated on real time basis by CTU on its website for better utilisation of Transmission assets.