



Ref: ARPPL/CERC /2022-2023/01

27th February 2023

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

Subject: Submission of Comments/Suggestions on “Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (First Amendment) Regulations, 2023.” 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 Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (First Amendment) Regulations, 2023. On 27.01.2023.

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

Authorized Signatory

Ayana Renewable Power Private Limited

Registered & Corporate Office:

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Annexure-I

ARPL Comments Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (First Amendment) Regulations, 2023.

Sr No.	Regulation No	Existing Clause	Our Suggestion
1	9.3	An applicant which is REGS (other than Hydro generating station), ESS (excluding PSP) or Renewable power park developer to which final grant of connectivity has been issued, shall have to achieve the financial closure for the capacity of such Connectivity, (a) within a period of 12 months from the date of issuance of final grant of connectivity, if the start date of Connectivity is within 2 years from date of issuance of final grant of connectivity or (b) a period equivalent to 50% time period between issue of final grant of Connectivity and start date of Connectivity, if the start date of Connectivity is more than 2 years from date of issuance of final grant of connectivity:	Financial Closure should be linked to the PPA terms and conditions as in many cases the projects gets delayed due to numerous reasons including force majeure and non-signing of PPA and PSA post bidding.
2	24.6 d(ii)	six months after the scheduled date of commercial operation for generating station(s) being set up without LOA or PPA.	To be amended to twelve months after the Scheduled date of commercial operation for generating stations being set up without LOA or PPA
3	20.4	Provided further that for the entity covered under clause (iii) of Regulation 17.1 of these regulations, if GNA is relinquished prior to date of effectiveness of GNA, Conn-BG1 and Conn-BG3 shall be encashed corresponding to the relinquished quantum as relinquishment charges.”	To be amended to re relinquishment of CON BG 1 only

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