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Sent: Wed, 04 Dec 2024 16:38:57 +0530 (IST)
Subject: CERC: Sharing of Inter-State Transmission Charges and Losses (Fourth Amendment)
Regulations,2024

Dear Sir/ Ma'am,

With reference to the enclosed Public Notice dated 09.10.2024, inputs from
SECI is enclosed for kind consideration.

Regards,

B Abhiram Vishnu

Dy. Manager (Corporate Planning)

Solar Energy Corporation of India Ltd.

Ph. 011-24666-282

Inputs -Sharing of Inter-State Transmission Charges and Losses (Fourth Amendment) Oct 2024

1. Amendment to Regulation 13 of the Principal Regulations

Ref. Clause	Clause mentioned in Draft amendment	Suggestions from SECI
A new sub-clause (h) shall be inserted after sub-clause (g) under Clause (2) of Regulation 13	“(h) Any REGS based on wind or solar source which is eligible for a waiver of inter-state transmission charges under Regulation 13(2) of these regulations and is having its scheduled date of commissioning on or before 30th June 2025 is granted extension of time to achieve COD by the competent authority in terms of the Power Purchase Agreements (where PPA has been entered into with, a Renewable Energy Implementing Agency or a distribution licensee or an authorized agency on behalf of distribution licensee, consequent to tariff based competitive bidding) or the Commission (for cases other than specified PPA,	(i) It may be specified that the ISTS waiver bracket as per the original SCD will be applicable for projects, wherein extension is granted by REIA, even when the original SCD of such projects is after 30.06.2025. (ii) As per proposed regulations BESS projects having COD on

	<p>on an appropriate application or before made by the entity), on account 30.06.2025 are of any Force Majeure event eligible for including non-availability of waiver of ISTS transmission or for reasons not charges, attributable to the REGS, and the therefore these project achieves COD before the projects may extended date, it shall be also be eligible for a waiver of inter-state considered to be transmission charges as if the eligible for said REGS had achieved COD on waiver if 30.06.2025. extension is granted by REIA.</p>	
	<p>Provided that, for the purpose of this Clause, such extension shall not exceed a period of six months at a time and not more than two times."</p>	<p>Proposed to be removed as per justification at pt. (b).</p>

Justification:

- a. It is submitted that as per proposed regulations, the benefit of ISTS waiver is being continued, even after extension in SCD, for the REGS based on solar/wind having SCD on or before 30.06.2025 but the benefit of ISTS waiver has not been allowed for the REGS based on solar/wind having SCD after 30.06.2025 and extension is granted. For example as per proposed regulations:

- i. If SCD of a REGS based on solar/wind source is 20.06.2025 and after the extension by REIA, SCD is revised as 30.04.2026 and project is commissioned within 30.04.2026 then the said project shall be eligible for waiver of 100% ISTS charges.
 - ii. If SCD of a REGS based on solar/wind source is 01.10.2025 (falling under 75% bracket) and after the extension by REIA, SCD is revised as 30.08.2026 and project is commissioned within 30.08.2026 then the said project shall be eligible for waiver of only 50% ISTS charges as per proposed regulations.
 - iii. It has been observed by SECI that in the cases of extension granted in SCD as per contractual arrangements, neither the generator nor the DISCOMs are at fault therefore both (generator and DISCOMs) are not willing to take the additional burden of ISTS charges arising on account of change in the waiver bracket (slab).
- b. Hon'ble Commission is requested to remove the barrier of extension limit of 1 year as proposed in the regulations as some times REIA is required to give extension in SCD to the generators more than 1 year also considering the delay in readiness of connectivity, change in land policy etc.

2. As applicable

Various Government orders regarding ISTS charges waiver have been issued with respect to offshore wind, BESS, Green Hydrogen etc. These may be suitably incorporated in the

amendment.