



SOLAR POWER DEVELOPERS ASSOCIATION

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Website: www.solarpda.com

Shekhar Dutt, SM, IAS(Ret)
Director General, SPC
Former Governor of Chhattisgarh Sta

Date: 04.05.2018

Sub: Request for extension of bid submission dates for tenders of ISTS
connected solar projects by SECI and NTPC.

Dear Shri Anand Kumar

Greetings from Solar Power Developers Association (SPDA).

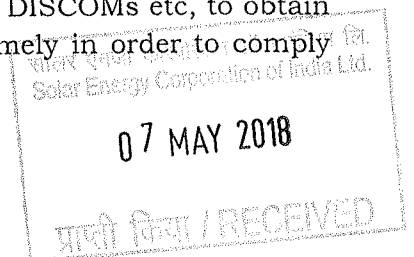
The pace of solar capacity addition under 100 GW National Solar Mission by 2022 and 40% energy mix by 2030 wherein Solar capacity is expected to make highest contribution than any RE source needs a fail proof process in terms of connectivity and evacuation.

We also recall the encouraging assurance given by Honourable Minister Sh. R K Singh ji at various occasions that bidding of solar/wind projects shall be held in fair & transparent manner and every aspect of solar and wind projects has be dealt strictly as per provisions of PPA/contract.

Currently around 10,000 MW of solar tenders with connectivity at CTU substations through ISTS are out for bidding in coming weeks.

Agency	Capacity (MW)	Ref	Bid submission
NTPC	2000	RE-CS-0000-BOO-3 dt.10.03.2018	21.05.2018
SECI	2000	SECI/C&P/SPD/RfS /2000MW/122017	25.05.2018
SECI	3000	SECI/C&P/SPD/RfS/ 3000MW/022018	05.06.2018
SECI	3000	NIT stage	

Therefore, it is very essential that all the tenders/RFPs/PPAs should have the complete clarity in terms of obligations of developers, off-takers and interfacing agencies. At the same time, the tender conditions must be well aligned with latest regulations of interfacing agencies i.e. Transmission utilities, DISCOMs etc, to obtain the essential permissions required to evacuate the power timely in order to comply with PPA conditions.



Former

- Deputy National Security Advisor, Govt. of India
- Defence Secretary, Govt. of India
- Secretary Defence Production, Govt. of India
- Secretary Ministry of Health Govt. of India
- Director General Sports Authority of India



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Shekhar Dutt, SM, IAS(Re)
Director General, SPI
Former Governor of Chhattisgarh St:

You are requested to kindly refer to the RFP clause 7.2 (SECI 2000 MW ISTS based tender) wherein it clearly states that ***“The responsibility of getting ISTS connectivity and Long term open access shall be entirely with solar power developer (SPD) and shall be at the cost of SPD.*”**

All other tenders by SECI/NTPC have the same clause with respect to the **connectivity/evacuation of solar projects under ISTS tenders.**

At this stage, the procedure/guidelines for grant of connectivity to Inter State Transmission System (ISTS) and regulations for General Network Access (GNA) are not finalized.

The Central Electricity Regulatory Commission (CERC) has uploaded the draft “Procedure for grant of connectivity to projects based on RE sources to Inter State Transmission system” along with other related matters” for comments of stakeholders by 23.04.2018 and the public hearing is yet to be scheduled.

It is noteworthy that on the applications filed by industry members, Central Transmission Utility (PGCIL) has not yet sanctioned the connectivity/Long Term Open Access (LTOA) since September 2017.

Our feedback from Industry members is that the draft procedure for grant of connectivity and GNA regulations has many contradictions with respect to the allocation of connectivity in multiple stages, eligibility, charges of sharing the transmission infrastructure etc. Without resolving such issues, it will lead to unfair allocation of connectivity. Comments/suggestions on the procedures have been represented by Industry members to CERC. It is understood that the public hearing for procedure of grant of connectivity is yet to be scheduled, which is required to be conducted before the finalization of the same by CERC.

The recent tenders released by SECI and NTPC for 10,000 MW solar projects through ISTS are scheduled for bidding in May-June 2018. In the light of the abovementioned, it is very essential that bid for all these projects must be held only after the regulations/procedures for grant of connectivity at ISTS are finalized by CERC after due consideration of comments from stakeholders. Same will also be helpful in encouraging participation, discover the fair pricing and reduce the risk of disputes that may arise out of ambiguities on account of procedure for grant of connectivity.

Former

- Deputy National Security Advisor, Govt. of India
- Defence Secretary, Govt. of India
- Secretary Defence Production, Govt. of India
- Secretary Ministry of Health, Govt. of India
- Director General, Sports Authority of India



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Shekhar Dutt, SM, IAS(Ret)
Director General, SPD
Former Governor of Chhattisgarh State

With above in consideration, SPDA earnestly request you to kindly direct NTPC and SECI to defer the bid submission deadlines of all the tenders for ISTS connected solar projects until the procedures for grant of ISTS connectivity and GNA regulations are finalised by CERC.

Similar requests have been submitted by several Industry members to SECI/NTPC and MNRE. Few of them are enclosed for your kind reference.

We look forward to your favourable consideration in this regard.

Thanking You.

With warm regards

Yours Sincerely

Shekhar Dutt

Shri Anand Kumar, IAS
Secretary
Ministry of New and Renewable Energy (MNRE)
CGO Complex
New Delhi.

Encl: As Above

Copy to:

1. Chairman, Honourable Central Electricity Regulatory Commission (CERC)
2. Chairman, National Thermal Power Corporation (NTPC)
3. Managing Director, Solar Energy Corporation of India (SEC)

Former

- Deputy National Security Advisor, Govt. of India
- Defence Secretary, Govt. of India
- Secretary Defence Production, Govt. of India
- Secretary Ministry of Health, Govt. of India
- Director General, Sports Authority of India



Regulations on Communication System for transmission of electric and other regulations (as amended from time to time) issued by Appropriate Commission and Central Electricity Authority (CEA). Minimum voltage for interconnection at the ISTS shall be 220 kV.

- 7.2 The responsibility of getting ISTS connectivity and Long Term Open Access (LTA) shall entirely be with the SPD and shall be at the cost of the SPD. The transmission of power up to the point of Interconnection /Delivery Point where the metering is done for energy accounting, shall be the responsibility of the SPD at his own cost. In case the SPD is required to use InSTS to bring solar power at ISTS point, he may do so per rule and regulations prescribed by the respective SERC in this regard.
- 7.3 The maintenance of Transmission system up to the Inter-connection Point shall be the responsibility of the SPD.
- 7.4 The arrangement of connectivity can be made by the SPD through a dedicated transmission line which the SPD may construct himself or get constructed by PGCIL/State Transmission Company or any other agency. The entire cost of transmission including cost of construction of line, wheeling charges, SLDC/Scheduling charges, SOC, MOC maintenance, losses etc. and any other charges from the Project upto the Interconnection Point will be borne by the SPD. Two or more Projects can be connected to a common pooling substation from which the pooled power can be transferred to the CTU substation through a common transmission line subject to the following conditions:
- a) Acceptance of such an arrangement by the CTU.
 - b) The meters for each project at pooling substation are sealed by CTU/STU/Discom/ SLDC.

The energy accounts are divided and clearly demarcated for the power generated at the Project and are issued by the STU/SLDC/RLDC concerned. In case of Pooling substation, losses in the transmission line between the Pooling substation and the CTU

Date: 30th April 2018

To,
HON'BLE SECRETARY
Ministry of New and Renewable Energy,
Government of India,
Block 14, CGO Complex, Lodhi Road,
New Delhi

Sub: Regarding ISTS Tenders and Draft "Procedure for Grant of Connectivity to Projects Based on Renewable Sources to Inter-State Transmission System".

Ref: Draft "Procedure for Grant of Connectivity to Projects Based on Renewable Sources to Inter-State Transmission System"

Dear Sir,

The Central Electricity Regulatory Commission ("CERC") has uploaded the draft "Procedure for Grant of Connectivity to Projects Based on Renewable Sources to Inter-State Transmission System" ("Connectivity Procedure") and the Draft (Grant of Connectivity and General Network Access to the inter-State transmission system and other related matters) Regulations, 2017.

Considering there are multiple tenders/ notification published by SECI and NTPC for development of **ISTS (Inter State Transmission System)-Connected Solar Power Projects** with cumulative capacity of 10 GW, the above referred drafts are very critical for the closure of bids and execution of the project.

We have already submitted our suggestions to the CERC vide letter dated 23.04.2018 on certain aspects of the Connectivity procedure and would like to highlight the causes of concern, requesting your support on the same:

Among the following points from the Draft Procedure:

- Clause 7.3. CTU shall grant Stage-I Connectivity by indicating two locations- one Primary and other alternate location- within 60 days of the last date of the month in which the application was received.
- Clause 9.2.1. In order to be eligible for Stage II, following milestones have to be achieved:
 - i. Ownership or lease rights for 50% or land use rights of the land required for the capacity of Stage II connectivity; and
 - ii. PPA (of 7 years or more) signed for capacity not less than 50 MW.

Our Concern:

- a) There is a possibility of multiple bidders applying for Stage II connectivity for the same substation for these above referred tenders; and for their application, they would have acquired/ taken on lease at least 50 % of the land required.
- b) As per the draft procedure, these applications shall be processed on first cum first serve basis. In such a scenario, the bidders, whom the connectivity is not granted, shall be at huge loss on account of the investment in land required to submit their application. At the same time, this condition appears to favor few companies and is unfair for rest of the industry.

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- c) Owing to this, the tendering authorities may not be able to get these projects developed at full capacity as majority of serious developers may get eliminated from obtaining connectivity in spite of being a selected bidder under the tenders.

Recommendations:

In light of the above, we would like to recommend:

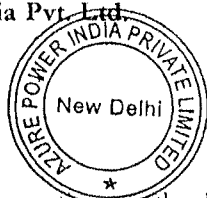
1. The above requirement with regard to land should be removed from eligibility criteria, as this would attract more competitiveness in the government's competitive bidding and would ensure successful, transparent & timely execution of the projects. Moreover, the seriousness of the applicant would be well showcased through the PPA and the Bank Guarantee being submitted by them.
2. CTU should grant Stage-I Connectivity by indicating one firm location for connectivity.
3. Further, in the alternative to the above, we would suggest substation-wise, state-wise allocation of the available capacity in the ISTS network may be adopted. The same has been done in the past by states like Telangana, Andhra Pradesh, Karnataka.
4. PGCIL should be an equal confirming party under the tenders, right from the bidding stage, and should accord confirmations regarding the available evacuation facility for the capacity to be evacuated under these tenders.
5. SECI & NTPC should share the available capacity of the ISTS substation, given by PGCIL, as part of the tender documents, while inviting the bids.
6. We would request MNRE to take active leadership in facilitating the above proposed process and direct SECI, NTPC and other such authorities for efficient & transparent closure of bids.

While we are hopeful that MNRE will consider our above request but at the same time it is very important to hold all announced ISTS bids (by SECI/NTPC) till the time a revised Connectivity Procedure comes into effect and the bid submissions should be scheduled at least 1.5 - 2 months from the date of publication of the procedure/regulation.

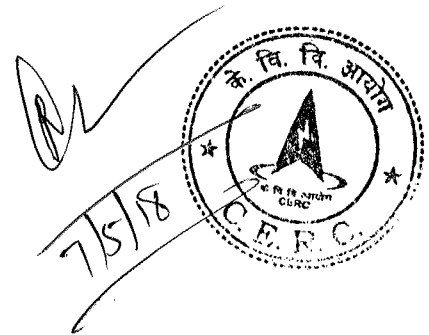
We would be happy to provide any further information/justification in person at a time convenient to you.

Yours Sincerely,
For Azure Power India Pvt. Ltd.

Authorised Signatory



Encl: Azure Power's suggestions on the draft procedure



Azure Power India Private Limited

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From: Sprng Energy Private Limited
Office 201, 2nd Floor,
Pentagon P-2, Magarpatta City,
Hadapsar,
Pune – 411013,
Maharashtra, India
Date: May 02, 2018

To,
Chairman & Managing Director,
NTPC Limited,
NTPC Bhawan, SCOPE Complex,
Institutional Area, Lodhi Road,
New Delhi - 110003

Subject: Request to keep on hold forthcoming non-park solar and wind power tenders till finalization of regulations and procedure on Connectivity by CERC.

Respected Sir,

Sprng Energy Private Limited (SEPL) is a renewable energy platform set up in India by ACTIS group, with a total commitment of US\$450mn of equity from ACTIS Energy Funds to set up 2GW of renewable energy capacity (solar and wind) in the next 4-5 years in India. In Feb 2017, we participated in the Rewa solar park auction and won a 250MW PPA, which is currently under execution. SEPL has won 197.5 MW Wind Power Project in Gujarat State based competitive bidding and has been selected as a successful bidder recently for setting up 300MW Wind Power Project under SECI Tranche 4 competitive bidding.

The Hon'ble Central Electricity Regulatory Commission (CERC) has issued draft procedure for grant of connectivity to projects based on RE sources to interstate transmission system seeking comments from the stakeholders by 23rd April, 2018. The Central Transmission Utility (CTU) is awaiting the finalization of this procedure to decide upon the applications filed for grant of connectivity and has not issued sanction of connectivity/LTA since last September, 2017.

In addition, identifying land parcels and initiating acquisition process with uncertainties on account of capacity availability for evacuation in respective CTU substations is very difficult. The CTU, as on date,

Sprng Energy Pvt. Ltd.

(Formerly known as "Arinsun Energy Pvt.Ltd")

does not display the updated status of allocation of bays at the existing or the proposed pooling substations. The issued tenders are of large size and bidders require comfort on this issue upfront.

We request you to please keep on hold all the non-park solar and wind power related tenders until finalization of the connectivity/LTA procedure by CERC and CTU issues updated status of allocation of bays at the existing or the proposed pooling substations based on the final issued procedure.

Submitted for your kind consideration please.

Thanking you,

For and on behalf of **Sprng Energy Private Limited**

(Gaurav Sood)
Chief Executive Officer
gauravsood@sprngenergy.com
+91 8805026730

Copy submitted w.r.t:

Hon'ble Secretary,
Ministry of Power,
Rafi Marg, Shram Shakti Bhavan,
New Delhi – 110001

Hon'ble Secretary,
Ministry of New and Renewable Energy,
Block-14, CGO Complex,
Lodhi Road,
New Delhi-110 003,

Sprng Energy Pvt. Ltd.



AVAADA POWER PRIVATE LIMITED

(Formerly known as Candor Power Private Limited)

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APPL/MNRE/CTUBIDS/2018-19/01

Date: 04/05/2018

To,
Shri. Anand Kumar (IAS)
Hon'ble Secretary,
Ministry of New and Renewable Energy,
Block - 14, CGO Complex,
Lodhi Road, New Delhi - 110 003

Sub.: Request to keep on hold forthcoming non- solar park CTU based solar bids till finalization of regulations and procedure on connectivity BY CERC

Respected Sir,

AVAADA POWER PRIVATE LIMITED one of the pioneers of solar power in India, through its associate companies has developed more than 1 GW solar and wind projects in India. We were the first Indian Independent Power Producer (IPP) to achieve the milestones of developing 1 GW renewable projects across the country. Along the way we were able to attract investors into our renewable portfolio from the likes of Asian Development Bank (ADB), GE and DEG as a testament to quality.

The Hon'ble Central Electricity Regulatory Commission (CERC) has issued draft procedure for grant of connectivity to projects based on RE sources to Intrastate Transmission System seeking comments from stakeholders by 23rd April 2018. The Central Transmission Utility (CTU) is awaiting the finalization of this procedure to decide upon the applications filed for grant of connectivity and has not issued sanction of connectivity/LTA since last September, 2017.

In additions, identifying land parcels and initiating acquisition process with uncertainties on account capacity availability for evacuation in respective CTU substations is very difficult. The CTU, as on date does not display the updated status of bays allocations at the existing or the proposed pooling substations.

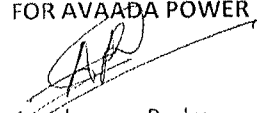
The solar bids issued by Solar Energy Corporation of India (SECI) and NTPC Ltd. (NTPC) are of large sizes and bidders require comfort on this issue upfront.

We request your kind office to please direct SECI and NTPC to hold all non-solar CTU based solar bids until finalization of the connectivity/LTA procedure by CERC and CTU issues updates status of all allocations of bays at the existing or the proposed pooling substation based on the final issued procedure.

Submitted for your kind consideration please.

Thanking You,

FOR AVAADA POWER PRIVATE LIMITED


Angshuman Rudra
Authorized Signatory

