

## Agenda for monthly meeting of Solar Power Developers with Secretary, Ministry of New and Renewable Energy (MNRE), Govt. of India

Date	08 <sup>th</sup> Feb 2021
Time	3:00 - 4:00 pm

### Part-I: New Issues

S.No	Issue Description	Presenter
1.	<p><b>Reinstatement of Concessional Custom Duty for already bid projects.</b></p> <p>As per the Budget 2021-22 speech, exemption to all items of machinery, instruments, appliances, components, or auxiliary equipment for setting up of solar power generation projects is being rescinded. This impacts all the under-construction projects which are already struggling due to COVID-19.</p>	Manish Karna
2.	<p><b>Cancellation of Dholera 700 MW tender by Gujarat after LOI was issued.</b></p>	Parag Sharma
3.	<p><b>Request update on Production Linked Incentive announced by Hon'ble Finance Minister on 11.11.2020 and during Budget 2021-22 for Solar PV Modules (approved financial outlay of Rs 4500 Cr over a five-year period)</b></p>	Ranjit Gupta
4.	<p><b>KPTCL have directed concerned department to raise the demand for collection of "one-time non-refundable common infrastructure charges" upto INR 36 lakh+ taxes for each project.</b></p>	Sandeep Kashyap
5.	<p><b>Request for clarification order regarding blanket timeline extension in aligning Financial closure with Scheduled Commissioning Date of RE projects beyond 5 months considering disruption due to pending approval in tariff adoption and PSA approval with ERCs, non-functioning of CERC and COVID-19.</b></p> <p>Also, this extension should include bids, LOA, PPA signed in during this period.</p>	Deepak Gupta
6.	<p><b>Misalignment of LTA start date and extended SCD.</b></p> <p>a. Request Ministry to approach CERC to release an order/confirmation under Section 107 of EA Act 2003 to invoke "Power to remove difficulties." The MoP order issued on 15.01.2021 needs alignment by extending the same for Solar park projects and contracts between SPDs with Private Discoms. This will avoid the transfer of financial risk to SPDs due to inconsistency occurring in contracts from PPA, ISA, TSA, etc.</p> <p>b. SPD's also request the direct competent authority to provide an Extension of Stage II connectivity (24 months) timeline to complete Project's dedicated transmission line &amp; pooling substation to be aligned with extended PPA SCD by the intermediary/ end procurer.</p>	Sandeep Kashyap
7.	<p><b>Safeguard Duty claims rejected on additional DC capacity as per the Hon'ble KERC order to be reconsidered under Change in Law.</b></p> <p>As per the directions from the Hon'ble KERC to ESCOMs mentioned in the KERC order, SPDA would like to rectify the flaw in the methodology of payment calculation for tariff increment on Safeguard Duty.</p>	Kishor Nair

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8.	<p><b>Request to MNRE for issuing directive on deviation that are taken standard bidding guidelines by Private Discoms which make some developer uncompetitive.</b></p> <p>This is to bring uniformity for Private Discoms to adhere Centre's guideline and an order/ directive needs to be issued to reduce any future deviation.</p>	Gaurav Sood
9.	<p><b>Enable location-specific/ state-specific bids at intra-state level for better distribution of RE resource development.</b></p>	Naveen Singh
10.	<p><b>Update on 7.5 GW bundled (generation &amp; transmission) tender in Leh and Kargil released by SECI.</b></p> <p>This is currently on hold as CTU is carrying out a study to assess the potential in the region, post which, a revised RfP may be released.</p> <p>SPDA seeks information regarding-</p> <ol style="list-style-type: none"> <li>Progress status on the decision for unbundling, clarity on expected timelines and sequence planned to release tenders for generation &amp; transmission.</li> <li>Also, whether there will be amendments released in this regard or will it be a fresh tender issued for both generation and transmission?</li> </ol>	Naveen Singh
11.	<p><b>Understanding timelines of generation and transmission system envisaged for the regions of Koppal, Gadag &amp; Bidar in Karnataka.</b></p> <p>The transmission bids are underway although the LTA has not been granted in these regions. A tender of 2.5 GW is coming up in Koppal which has been currently delayed.</p> <p>SPDA seeks information from MNRE to understand the timelines in this regard.</p>	Naveen Singh
12.	<p><b>Regulatory &amp; Market preparedness for Standalone Storage projects by SECI discussed during the RE Connect.</b></p> <p>SPDA seeks clarity on potential business models and the possibility of value stacking related to Storage assets.</p>	Naveen Singh
13.	<p><b>Challenge in steel procurement for installation of solar plant for module mounting structure (MMS)</b></p> <p>SPDA would like to intimate MNRE for possible monopolization due to due to shortage of steel supply for domestic manufacturers &amp; high volatility in price fluctuation in the last six months.</p>	Ravinder Khanna
14.	<p><b>Suggestions on the guidelines and the bid documents for RE Thermal tender w.r.t. Escalation Indices and treatment of storage assets.</b></p> <p>SPDA seeks visibility on timelines from MNRE.</p>	Deepak Gupta

## Part-II: Status update on past issues

S. No	Issue Description
1.	<p><b>Delay in proceedings of SGD/GST matters.</b></p> <p>a. The matters are pending before regulators for close to 2 years in few cases from the time of filing.</p> <p>b. Request to push States/ERCs to prioritize hearings for SGD and GST matters.</p> <p><i>SPDs further requested MNRE to intervene to resolve disbursement of at least first installment stuck in this matter.</i></p>
2.	<p><b>a. Delay in PSA signing for auctioned projects.</b></p> <p>Auctioned projects of around 18 GW capacity currently do not have signed PPA due to delay in PSA signing. <i>SPDA requested MNRE to discuss this with State Discoms to expedite signing of PSAs.</i></p> <p><b>b. Indefinite delays in taking approvals for procurement of power, PSA, Trading margin by State Discoms (End Procurers) from their State Commissions.</b></p> <p><i>In this regard, SPDA had sent a representation letter to MNRE for project capacity more than 5000 MW where PSA/PPA signed but are facing delays due to pending power procurement and tariff approval from their State Commissions.</i></p>
3.	<p><b>Non-opening of LCs by State Discoms</b></p> <p>In August 2019, MNRE notified that power dispatch will not happen if LC is not opened. However, some state like Telangana, Tamil Nadu, Karnataka are to yet to open LC.</p> <p><i>SPDA has sent letter for MNRE's intervention to expedite the matter. Status is currently pending.</i></p>
4.	<p><b>Delay in signing of Lease Agreement of SPDs with Gujarat Power Corporation Limited (Solar Park Developers)</b></p> <p>a. SPDs are executing Solar power projects in Raghnesda Solar park, Gujarat under the auction conducted by GUVNL . Successful bidders signed PPA with GUVNL in Aug 2019 and implementation Support Agreement (ISA) with GPCL (the nominated solar park developer for the projects) Oct 2019. The land was handed over to SPDs by GPCL in Nov 2019 under the advance possession route.</p> <p>b. SPDA shared with MNRE that as a requirement for financial institutions, one of the major condition precedents is the signing of Lease Agreement with GPCL, which is pending as the lease agreement between GPCL and the Revenue Department of Govt. of Gujarat has not been signed yet.</p> <p><u>Current Status:</u> SPDs requested MNRE's intervention to expedite this process.</p>
5.	<p><b>NGT order on CTU substations in Fatehgarh area, Rajasthan will impact readiness of evacuation system and commissioning schedule.</b></p> <p>a. A petition was filed in the NGT Delhi, alleging that Fatehgarh-II ISRS substation and the transmission lines by PGCIL are being setup on a deemed forest land.</p> <p>b. In this regard, a representation letter was sent to MNRE for their intervention w.r.t the NGT order which is expected to impact a total of 5GW of proposed Solar projects.</p>

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	MNRE expected to intervene by issuing necessary advice to PGCIL and concerned authorities that any development in the NGT case may not jeopardize the planned solar capacity.
6.	<p><b>Minimum Land requirement to be reduced for New Technology to fulfil FC conditions.</b></p> <p>As per RfS the land requirement is 1.5 Hectare per MW but with advancement in technologies especially with Mono PERC the land requirement has come down significantly. Therefore, MNRE to advise SECI for lowering down land as a compliance condition at the time of financial closure.</p> <p><i>SPDA Representation letter has been sent to Sec MNRE and is currently being examined.</i></p>
7.	<p><b>Open access projects under group captive projects.</b></p> <p>Need for uniformity and streamlining of State Discoms to comply with policy guidelines.</p>
8.	<p><b>Request to MNRE for publishing schedule of future bids</b></p> <p>SECI / Intermediate Procurer must float tenders after considering the DISCOMs near term plans, in terms of requirement.</p> <ol style="list-style-type: none"> <li>a. Nature of requirement: Peak vs RTC vs Solar vs Wind vs Hybrid</li> <li>b. RPO compliance</li> <li>c. Demand growth</li> </ol>
9.	<p><b>Setting up of committee in CEA to investigate RE curtailment across the country.</b></p>
10.	<p><b>a. Amendment in the BOM approval procedure (last)</b></p> <p>Approval of BOM by MNRE for CCDC requires possession of 100% land. As SBG guideline have been relaxed for land documentation, BOM approval procedure should be changed.</p> <p><i>SPDA representation is being currently examined by MNRE to streamline the online portal process.</i></p> <p><b>b. Amendment in BOM Procedure to enable C&amp;I projects for RPO obligated entities to access ISTS connectivity.</b></p> <p>Connectivity Procedure allows only LOAs issued by SECI/NTPC/REIAs. PPAs signed with RPO obligated entities C&amp;I developers should be allowed.</p> <p><b>c. Revision of quantity of tracker for solar projects.</b></p> <p>Quantity of tracker for solar projects needs to be revised upwards as current norm of 43 MT/MW AC side is not enough and it should be 43 MT/MW on DC side.</p> <p><i>SPDA sent a representation letter along with a provisional list of items for quantity tracker to be reviewed by MNRE &amp; a committee to be setup in this process to expedite this matter.</i></p>