

Sr. No.	Clause Ref.	Name of Stakeholder	Clause as per Procedure	Submission	Explanation / rationale by stakeholder	STU's Comments
1	1.1	Avaada Energy Private Limited	<p>Background</p> <p>1.1 This detailed procedure is issued in accordance with the various provisions of the Maharashtra Electricity Regulatory Commission (Transmission Open Access) Regulations, 2016 (hereinafter referred to as "MERC TOA Regulations"), the Government of Maharashtra, Renewable Energy Policy, 2020 along with prevailing methodology issued thereunder and considering the Maharashtra Electricity Regulatory Commission (MERC) Order dated 19 September 2019 in Case No. 235 of 2019. All applicants shall abide by the provisions of the MERC TOA Regulations.</p>	<p>Background</p> <p>1.1 This detailed procedure is issued in accordance with the various provisions of the Maharashtra Electricity Regulatory Commission (Transmission Open Access) Regulations, 2016 (hereinafter referred to as "MERC TOA Regulations"), and considering the Maharashtra Electricity Regulatory Commission (MERC) Order dated 19 September 2019 in Case No. 235 of 2019.</p> <p>In formulating this detailed procedure, due consideration has also been given to the provisions of the Government of Maharashtra, Renewable Energy Policy, 2020 along with prevailing methodology issued thereunder and considering the Maharashtra Electricity Regulatory Commission (MERC) Order dated 19 September 2019 in Case No. 235 of 2019. However, in case of any conflict between the provisions of this Methodology and the GoM Policy -2020 and/or the GoM Methodology-2022, the provisions of this Detailed Procedure shall prevail. All applicants shall abide by the provisions of the MERC TOA Regulations.</p>	<p>This draft aims to reform connectivity related procedures, with several provisions modified from the GoM Policy/Methodology. The proposed suggestions are essential to prevent any ambiguity in interpretation.</p>	<p>The clause in the present form is clear and self explanatory. The Procedure is prepared in line with GoM Policy and within the ambit of overall regulatory framework of the Hon'ble MERC. The Applicant seeking Grid connectivity is expected to apply as per stipulated Procedure only. Hence, suggestion is not accepted.</p>
2	3.1	Renew Private Limited	<p>3 Eligibility</p> <p>3.1 A Renewable Energy Power project having a capacity of 5 MW or more with or without storage based on any of the following: Category C - Renewable Energy power projects set up under "Maharashtra Green Hydrogen Policy -2023" issued by the Government of Maharashtra:</p> <p>a) For the co-located RE Generation Plant and Green Hydrogen Production Plant; b) For the co-located RE Generation & Green Hydrogen Derivative Production Plant; c) Any other renewable energy projects approved by the Competent Authority.</p>	<p>Ministry of Power ("MoP") vide its notification dated 21.08.2023 for Tariff based competitive bidding ("TBCB") guidelines for Wind Solar Hybrid Projects has already recognized Wind Solar Hybrid Projects at same and different location both. i.e., co-located and non- co- located Hybrid Projects.</p> <p><i>"3.1. These Guidelines are being issued under the provisions of Section 63 of the Electricity Act, 2003 for long term procurement of electricity through competitive bidding process, by Procurer(s), from Hybrid Power Projects having (a) bid capacity of 10 MW and above for projects connected to intra-state transmission system; and (b) bid capacity of 50 MW and above for projects connected to inter-state transmission system, subject to the condition that the rated power capacity of one resource (wind or solar) shall be at least 33% of the total contracted capacity."</i></p> <p><i>3.2. The solar and wind projects of the hybrid project may be located at same or different locations."</i></p> <p>In view of the above, we request the Ld. MSETCL to also allow non-co-located RE Generation Plants with Green Hydrogen Production Plant and Green Hydrogen Derivative Production Plant to be eligible under the aforesaid category. This will enable the promotion of Hybrid Generating Plants across the State and will help in achieve the national goal of 500 GW RE power by 2030.</p>		<p>As per Hon'ble MERC Regulations, Hybrid RE projects configured to operate at the same point of grid connection are allowed. Inclusion of 'non-co-located RE Generation Plant and Green Hydrogen Production Plant' and 'non-co-located RE Generation & Green Hydrogen Derivative Production Plant' in RE Procedure is subject to revision in the Regulations of the Hon'ble Commission. Hence, suggestion is not accepted.</p>
3	3.1	Tata Power		<p>There is no mention of BESS in clause a-c. Hence, these Hybrid combinations shall include Solar + BESS, Wind +BESS, Solar + Wind + BESS and Standalone BESS projects</p>		<p>The storage related projects are already mentioned in existing clause which is in line with MERC Regulations. The relevant extract is reproduced below: "3 Eligibility 3.1 A Renewable Energy Power project having a capacity of 5 MW or more with or without storage based on any of the following: Category A - Category B - Category C -"</p>

Sr. No.	Clause Ref.	Name of Stakeholder	Clause as per Procedure	Submission	Explanation / rationale by stakeholder	STU's Comments
4	3.1	Reliance		add new clauses after h) i) Solar + co-located BESS/ESS/any other Storage, where connectivity sought could be less than installed Solar capacity. j) Wind + co-located BESS/ESS/any other Storage, where connectivity sought could be less than installed Wind capacity. k) Wind-Solar hybrid + co-located BESS/ESS/any other Storage, where connectivity sought could be less than installed Wind + Solar capacity.	New clause	1. The storage related projects are already mentioned in existing clause which is in line with MERC Regulations. The relevant extract is reproduced below: <i>"3 Eligibility 3.1 A Renewable Energy Power project having a capacity of 5 MW or more with or without storage based on any of the following:...."</i> 2. Connectivity related suggestions are accepted and accordingly, following additional clause included in the Procedure: <i>"An Applicant, which are Renewable Energy Generating Stations shall apply for grant of Connectivity to the InSTS for the quantum equal to the installed capacity of the generating station: Provided that if such an applicant is a Hybrid Renewable Energy Project or Hybrid Renewable Energy Project with storage, it may apply for grant of Connectivity at least for the installed capacity of the wind or solar capacity, whichever is higher or upto the total installed capacity."</i>
5	3.1	Juniper Green Energy		A Renewable Energy Power project and Renewable Energy Park Developers having a capacity of 5 MW or more with or without storage based on any of the following: Category A - Renewable Energy Power Projects and Renewable Energy Park Developers (Excluding those projects covered under Category B & Category C below): a) Solar PV or Solar Thermal based on technologies approved by MNRE; b) Wind Power Project commissioned using new or re-powered wind turbine generators; c) Hybrid Renewable Energy project based on RE technologies such as Wind-Solar Hybrid, Solar-Biomass Hybrid, Solar-Co-Generation Hybrid, Solar Thermal Hybrid, and any other combination of RE technologies approved to be considered under this procedure; Note: 'Hybrid Renewable Energy Project' means a Renewable Energy Project that uses a combination of Renewable Energy technologies approved by MNRE for electricity generation, configured to operate at the same point of grid connection or at different point of grid connections as may be permitted under the relevant LOA/PPA entered with the discom/agency authorized on behalf of discoms: Provided that the rated capacity of one resource is at least 25% of the rated capacity of other resource;	It is essential that the regulations also extend to include renewable energy park developers as an eligible entity /route envisaged under the Clause 5.2 of the Regulations. Flexibility to be provided to the RE Developers to install separate component of hybrid project at multiple grid interconnection points as permitted under the relevant LOA/PPA entered with the discom/agency authorized on behalf of discoms. Our suggestion is in line with the practice adopted/followed in line with the CERC GNA Regulations.	1. The applicability of Procedure extended to Solar Park Developer, Wind Park Developer is already covered under Clause 3.3 of the Procedure. 2. As regards issue of grid connectivity for multi-located Hybrid Power Plant, STU comments are already provided below. Please refer STU comments against Clause 5.5. 3. Further, new provisos added under Clause 6.7.1 quoted below: 6.7.1 Grid connectivity is not transferrable. It is applicable only to the applicant. In case of Wind, Solar or Hybrid Power Projects, where there are multiple investors owning different generation capacities and connected to common evacuation infrastructure which is developed by the applicant, the Grid Connectivity will be applicable to the applicant and such investors, however, no separate grid connectivity shall be issued to the individual investor.

Sr. No.	Clause Ref.	Name of Stakeholder	Clause as per Procedure	Submission	Explanation / rationale by stakeholder	STU's Comments
5	3.1	Juniper Green Energy				<p>New proviso: <i>"Provided that where RE Park Developer (as declared in the application for connectivity) developing the infrastructure facilities for the RE Projects to be established in the RE Park obtains connectivity for evacuation of power from RE projects located in the RE Park, such arrangement between the RE Park Developer and the RE Projects shall not be in breach of the above and the connectivity so taken by the RE Park Developer shall be deemed to be on behalf of the RE Projects also for all intents and purposes. The RE Park Developer shall be required to declare the intent at the time of filing of the application for Connectivity.</i></p> <p><i>Provided further that where under any scheme duly declared in the application for connectivity, the RE Developer develops the RE Projects in aggregate, with Connectivity to the Grid taken by the RE Developer with intent to allocate, transfer and assign individual RE Projects to identified entities, such arrangement between the RE Developer and the RE Projects shall not be in breach of the above and the connectivity so taken by the RE Developer shall also be deemed to be on behalf of the RE Projects also "</i></p>
6	4.3	Avaada Energy Private Limited	4.3 STU shall share the updated available capacity of the InSTS substations for Renewable Energy integration on the STU website on the 1st day of every calendar Month.	<p>Nodal Agency and Coordination 4.3 The STU shall publish on its official website, on the first day of each calendar month: a) The updated available power evacuation capacity (in MW) of each InSTS substation; b) Substation-wise capacity specifically allocated for Renewable Energy integration; c) Any technical constraints or limitations affecting the available capacity; d) Details of all applications under consideration along with their status.</p>		<p>Stakeholder has not submitted any rationale for proposed modification.</p> <p>Based on feasibility of implementation, majority of suggestions are accepted with modified clause as under.</p> <p>Modified Clause: "4.3 The STU shall publish on its official website, on the first day of each calendar month: a) The updated available power evacuation capacity (in MW) of each InSTS sub-station; b) List of Planned InSTS sub-station (under STU plan) for Renewable Energy Evacuation ; c) Details of all applications . "</p>
7	4.3	Suzlon		New Point-5.7 to be added After -5.6 point is below, Online Status of RE Applicants should be available in public Domain/STU Website	RE Applicants can identify & plan in future grid connectives approvals accordingly	Suggestion is partially accepted. Please refer STU comments against Clause 5.5 above along with Modified clause.

Sr. No.	Clause Ref.	Name of Stakeholder	Clause as per Procedure	Submission	Explanation / rationale by stakeholder	STU's Comments
8	5.1	Avaada Energy Private Limited	<p>5 Application</p> <p>5.1 Application for grant of Grid Connectivity to the InSTS shall be made online as per the application form duly signed by an authorized person of Applicant as per Format - 2 of this Procedure. Person/Applicant has to select a substation from the list available on the STU/MEDA website as updated on the 1st of every calendar Month. Such a list shall depict the name, capacity in terms of MW available for Renewable Energy Grid Connectivity, geographical coordinates and other relevant details of existing as well as planned substations with a targeted date of commercial operationalization of such planned substations. The Application shall contain details such as the proposed geographical location of the applicant, quantum of power to be injected, unit-wise commissioning schedule, etc.</p>	<p>Application</p> <p>5.1 Application for grant of Grid Connectivity to the InSTS shall be made online as per the application form duly signed by an authorized person of Applicant as per Format - 2 of this Procedure.</p> <p>Person/Applicant has to may select a substation from the list available on the STU/MEDA website as updated on the 1st of every calendar Month. Such a list shall depict the name, capacity in terms of MW available for Renewable Energy Grid Connectivity, geographical coordinates and other relevant details of existing as well as planned substations with a targeted date of commercial operationalization of such planned substations.</p> <p>Alternatively, the Applicant may submit application without selecting a specific substation, and instead provide the geographical location of their proposed Renewable Energy Power Project with capacity of 100 MW or greater, for which the STU shall plan a new substation and grant Connectivity in accordance with Clause 7.8 of this Procedure, or plan grid connectivity to the project through Loop-in and Loop-out (LILo) in accordance with Clause 8.3.1 (c) of this Procedure.</p> <p>The Application shall contain details such as the proposed geographical location of the applicant, quantum of power to be injected, unit-wise commissioning schedule, etc.</p>	<p>Since STU is the nodal agency, therefore this list has to be as per the STU website only, and there should not be left any ambiguity about which agency's website has to be referred to.</p> <p>2. Applications should also be allowed to be filed beyond the list hosted on STU website, and STU can grant connectivity on planned/proposed substations or through LILo. This would result in the optimised utilization of the InSTS network.</p>	<p>1. Enabling Clause for applicant who intend to seek grid connectivity on proposed substation is included in line with Clause 7.8 of this Procedure. Further, such an application cannot be sole criteria for STU to propose a InSTS substation (Hence, Cl. 7.8 Note 2 - modified). Accordingly, suggestion is partially accepted.</p> <p>Modified Clause: <i>" 5.1 Application for grant of Grid Connectivity to the InSTS shall be made online as per the application form duly signed by an authorized person of Applicant as per Format - 2 of this Procedure. Person/Applicant has to select a substation from the list available on the STU/MEDA website as updated on the 1st of every calendar Month. Such a list shall depict the name, capacity in terms of MW available for Renewable Energy Grid Connectivity, geographical coordinates and other relevant details of existing as well as planned substations with a targeted date of commercial operationalization of such planned substations.</i> Alternatively, the applicant may submit application for grant of Grid Connectivity to the InSTS without selecting a specific substation and instead provide the geographical location of their proposed Renewable Energy Power Project in accordance with Clause 7.8 of this Procedure. The Application shall contain details such as the proposed geographical location of the applicant, quantum of power to be injected, unit-wise commissioning schedule, etc. "</p> <p>2. Additionally, Note 2 to Clause:7.8, modified with the term 'to be proposed' to be replaced by 'that may be proposed'. Pl. refer STU comments against Clause 7.8.</p>
9	5.2.4	Suzlon	<p>5.2 Documents to be submitted along with the Application:</p> <p>5.2.1 Notarized affidavit as per Format - 1</p> <p>5.2.2 Application shall be accompanied by a non-refundable fee as specified in Regulation 5.2 of the MERC TOA Regulations, as amended from time to time including applicable taxes.</p> <p>5.2.3 A non-refundable application fees are to be paid to STU (MSETCL) account through Bank Payment Gateway available on Online Application Portal.</p> <p>5.2.4 Board resolution for the proposed project.</p> <p>...</p>	<p>Most of the Companies are multinational and respective board meeting will be held once or twice in a year, hence it is not possible to submit project specific board resolution.</p>	<p>It is impossible to provide project specific Board resolution so request MSETCL to exempt this clause</p>	<p>In order to ensure genuineness of application, Board Resolution is required. Hence, suggestion is not accepted.</p>
10	5.2.5	Suzlon	<p>5.2 Documents to be submitted along with the Application:</p> <p>...</p> <p>5.2.4 Board resolution for the proposed project.</p> <p>5.2.5 Copy of Memorandum and Article of Association having provision to take up proposed business/ project.</p>	<p>Most of the Companies are multinational and respective board meeting will be held once or twice in a year, hence it is not possible to submit project specific MOA.</p> <p>Eg. If a company is Registered under company Act for any specific project, then it shall be utilized to only that project. In case, for any reasons if we wants to use this company for some other project we cannot use it to that company. If we did not get the tender award then i cannot use this company to so there project. Hence Project Specific MOA OR Board Resolution shall be removed and exempted.</p>	<p>It is impossible to provide project specific MOA so request MSETCL to exempt this clause</p>	<p>In order to ensure genuineness of application, copy of Memorandum and Article of Association having provision to take up proposed business/ project is required. Hence, suggestion is not accepted.</p>

Sr. No.	Clause Ref.	Name of Stakeholder	Clause as per Procedure	Submission	Explanation / rationale by stakeholder	STU's Comments
11	5.2.6	Tata Power	5.2.6 In case of Solar/Wind Park Developer, the documents shall be submitted in combination of clauses (a) and (b) or combination of clauses (a) and (c) as stipulated hereunder: (b) Registered Title Deed as a proof of Ownership or lease rights or land use rights for 50% of the land required for the capacity for which Grid Connectivity is sought: Provided that where State Government issues Government Order for allotment of Land to the Nodal-Agency identified for development of Renewable Energy in the State, which in turn issues Advance Possession of land to the project developer, such Government Order allotting land to the Nodal Agency accompanied with Advance Possession letter issued in the name of Applicant of Grid Connectivity, shall be considered as a valid document towards Land Use Rights subject to the condition that the said documents shall be submitted for at least 50% of the land required for the capacity for which Grid Connectivity is sought;	50% of the land required for the capacity for which Grid Connectivity is sought Clarification required- Quantum of land (acres) to be considered for Solar, Wind & BESS		Quantum of land for different type of RE projects shall be as mentioned in the CERC updated 'Undertaking towards submission of Land documents'. The CERC adopted existing Format for such undertaking has been incorporated in mandatory Formats to be submitted by applicant along with Procedure. This format shall be updated from time to time as per CERC. Accordingly, suggestion is accepted.
12	5.2.6	Reliance		There should be flexibility for replacing the (c) with (b) within specified time of 6 months from connectivity intimation so that BG can be returned back to applicant.		As regards suggestion to offer flexibility to replace, such changes have not been envisaged by CERC in case of Renewable Power Park Developer. Hence, suggestion is not accepted.
13	5.2.6	Avaada Energy Private Limited	5.2.6 In case of Solar/Wind Park Developer, the documents shall be submitted in combination of clauses (a) and (b) or combination of clauses (a) and (c) as stipulated hereunder: (a) Authorization (b) Registered Title Deed as a proof of Ownership or lease rights or land use rights for 50% of the land required for the capacity for which Grid Connectivity is sought: Provided that where State Government issues Government Order for allotment of Land to the Nodal-Agency identified for development of Renewable Energy in the State, which in turn issues Advance Possession of land to the project developer, such Government Order allotting land to the Nodal Agency accompanied with Advance Possession letter issued in the name of Applicant of Grid Connectivity, shall be considered as a valid document towards Land Use Rights subject to the condition that the said documents shall be submitted for at least 50% of the land required for the capacity for which Grid Connectivity is sought; c)	5.2.6 In case of Solar/Wind Park Developer, the documents shall be submitted in combination of clauses (a) and (b) or combination of clauses (a) and (c) as stipulated hereunder: ...; Registered Title Deed as a proof of Ownership or lease rights or land use rights for 50% of the land required for the capacity for which Grid Connectivity is sought: Provided that these documents in the name of Parent, subsidiary, or affiliate of the applicant shall also be acceptable. Provided further that where State Government issues Government Order for allotment of Land to the Nodal-Agency identified for development of Renewable Energy in the State, which in turn issues Advance Possession of land to the project developer, such Government Order allotting land to the Nodal Agency accompanied with Advance Possession letter issued in the name of Applicant of Grid Connectivity, shall be considered as a valid document towards Land Use Rights subject to the condition that the said documents shall be submitted for at least 50% of the land required for the capacity for which Grid Connectivity is sought;		Stakeholder has not submitted any rationale for proposed modification. However, Suggestion partially accepted subject to condition that the applicant shall not be eligible to seek another Grid connectivity using the same land documents based on which Grid Connectivity is sought. Modified Clause: Following proviso is inserted before the existing proviso: "Provided that these documents in the name of a parent company or subsidiary company(ies) of the applicant shall also be acceptable subject to condition that the applicant shall not be eligible to seek another Grid connectivity using the same land documents based on which Grid Connectivity is sought. Provided further that"

Sr. No.	Clause Ref.	Name of Stakeholder	Clause as per Procedure	Submission	Explanation / rationale by stakeholder	STU's Comments
14	5.2.6	Juniper Green Energy		<p>In case of Solar/Wind/ Renewable Energy Park Developer, the documents shall be submitted in combination of clauses (a) and (b) or combination of clauses (a) and (c) as stipulated hereunder:</p> <p>(a)...</p> <p>(b) Registered Title Deed as a proof of Ownership or lease rights or land use rights for 50% of the land required for the capacity for which Grid Connectivity is sought, in the name of RPPD or investors along with copy of MOU/Right to Use agreement with such investor.</p> <p>...</p> <p>(c)...</p>	<p>1. As per provisions of CERC GNA Regulations, for the applications based on RE Park Developer mode, investors/ generation project developers decide the technology of project in the park, therefore, the park-based applications are treated as RE Park Developer (RPPD) based applications. Further, in view of the intent of the clause 5.2.6, we request that RE Park Developer (RPPD) may also be considered as an eligible entity.</p> <p>2. With reference to the requirement of submission of land documents along with connectivity application, we request that in case of park-based application, land should NOT necessarily be in the name of RPPD (i.e. applicant). Further, in case of park-based application, land in the name of investor or project developer should be acceptable, with whom the RPPD has signed MOU/right to use agreement for connectivity. Above suggestion/request is in line with the current practice being followed by STU.</p>	<p>1. Suggestion is partially accepted by including the term Renewable Power Park Developer.</p> <p>2. As regards suggestion to allow land in the name of investors based on MoU basis, such changes have not been adopted in CERC Regulations.</p>
15	5.2.6 (a)	Tata Power	5.2.6 In case of Solar/Wind Park Developer, the documents shall be submitted in combination of clauses (a) and (b) or combination of clauses (a) and (c) as stipulated hereunder: (a) Authorization by the Central Government or the State Government, as applicable, to undertake infrastructural activities including arrangement for Grid Connectivity on behalf of solar power generators or wind power generators;	Authorization by the Central Government or the State Government, as applicable, to undertake infrastructural activities including arrangement for Grid Connectivity on behalf of solar power generators or wind power generators; Which State Level agency shall provide Authorization MEDA or MSETCL or MERC		The proposed Clause is as per CERC Regulations and GoM RE Policy. Authorization cannot be clarified under Procedure. Hence, suggestion is not accepted.
16	5.2.6 (c)	Renew Private Limited	“(c) For a capacity up to 1000MW - Bank Guarantee of Rs. 10 lakh/ MW and for a capacity more than 1000MW- Bank Guarantee of Rs. 100 Crore plus Rs. 5 lakh/ MW for capacity over and above 1000MW, in lieu of ownership or lease rights or land use rights of land for 50% of the land required for the capacity for which Connectivity is sought subject to provisions of clause 9.4, 9.5 and 9.6 of this Procedure.	<p>We request the Ld. MSETCL to review the BG charges in case of Solar/Wind Park Developer and RE Power Projects (excluding Hydro Generating stations) or Energy Storage System (“ESS”) (excluding Pumped Storage Plant (PSP) seeking grant of Grid Connectivity into the InSTS.</p> <p>The aforesaid provisions are completely aligned with the CERC Connectivity and GNA Regulations, 2024. However, it is prudent to mention that 50 MW is the minimum quantum required for Grid Connectivity to Inter State Transmission System (“ISTS”) whereas 5 MW is the minimum quantum required for Grid Connectivity to InSTS which comes out to 1/10th of the ISTS system. Therefore, in view of the above and in order to promote RE Generation across the state, we request the Ld. MSETCL to reduce the Bank Guarantee charges proportion to the minimum quantum of Grid Connectivity for the aforesaid provisions as below:</p> <p>“(c) For a capacity up to 100MW - Bank Guarantee of Rs. 1 lakh/ MW and for a capacity more than 100MW - Bank Guarantee of Rs. 10 Crore plus Rs. 0.5 lakh/ MW for capacity over and above 100MW, in lieu of ownership or lease rights or”</p>		The proposed clause ensures the genuineness of applicant towards development of RE projects and is in line with the CERC Regulations. Applicant have been also been with provided other options. Hence, suggestion is not accepted.

Sr. No.	Clause Ref.	Name of Stakeholder	Clause as per Procedure	Submission	Explanation / rationale by stakeholder	STU's Comments
17	5.2.7	JSW	5.2.7 In case of Applicants which are Renewable Energy Power Projects (other than Hydro generating station) or ESS (excluding Pumped Storage Plant (PSP)) the following documents shall be submitted: (a) Letter of Award (LOA) by, or Power Purchase Agreement (PPA) 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, as the case may be;	In case of Applicants which are Renewable Energy Power Projects (other than Hydro generating station) or ESS (excluding Pumped Storage Plant (PSP)) the following documents shall be submitted: Letter of Award (LOA) by, or Power Purchase Agreement (PPA) 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 with Third Party or Captive consumer , as the case may be;		Stakeholder has not submitted any rationale for proposed modification. The clause is in line with CERC Regulations. The proposed suggestion is also not adopted by CERC Regulations. Hence, suggestion is not accepted.
18	5.2.7	Reliance	In case of Solar/Wind Energy power projects, if applied connectivity under (c) it can be considered back under (a) or (b) in a specified time duration.	There should be flexibility for replacing the (c) with (a) or (b) within specified time of 6 months from connectivity intimation so that BG can be returned back to applicant.		Suggestion is accepted and accordingly, new clause __ added in the Procedure.
19	5.2.7	Avaada Energy Private Limited	5.2.7 In case of Applicants which are Renewable Energy Power Projects (other than Hydro generating station) or ESS (excluding Pumped Storage Plant (PSP)) the following documents shall be submitted: (a) Letter of Award (LOA) by, or Power Purchase Agreement (PPA) 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, as the case may be; Or (b) Registered Title Deed as a proof of Ownership or lease rights or land use rights for 50% of the land required for the capacity for which Grid Connectivity is sought: Provided that where State Government issues Government Order for allotment of Land to the Nodal-Agency identified for development of Renewable Energy in the State, which in turn issues Advance Possession of land to the project developer, such Government Order allotting land to the Nodal Agency accompanied with Advance Possession letter issued in the name of Applicant of Grid Connectivity, shall be considered as a valid document towards Land Use Rights subject to the condition that the said documents shall be submitted for at least 50% of the land required for the capacity for which Grid Connectivity is sought; Or (c) For a capacity up to 1000 MW	5.2.7 In case of Applicants which are Renewable Energy Power Projects (other than Hydro generating station) or ESS (excluding Pumped Storage Plant (PSP)) the following documents shall be submitted: a) Letter of Intent (LOI) or Letter of Award (LOA) by, or Power Purchase Agreement (PPA) 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, as the case may be; Or (a) Registered Title Deed as a proof of Ownership or lease rights or land use rights for 50% of the land required for the capacity for which Grid Connectivity is sought: Provided that these documents in the name of Parent, subsidiary, or affiliate of the applicant shall also be acceptable. Provided further that where State Government issues Government Order for allotment of Land to the Nodal-Agency identified for development of Renewable Energy in the State, which in turn issues Advance Possession of land to the project developer, such Government Order allotting land to the Nodal Agency accompanied with Advance Possession letter issued in the name of Applicant of Grid Connectivity, shall be considered as a valid document towards Land Use Rights subject to the condition that the said documents shall be submitted for at least 50% of the land required for the capacity for which Grid Connectivity is sought;		1. Stakeholder has not submitted any rationale for proposed modification for inclusion of Letter of Intent (LOI). The same is also not adopted by CERC Regulations. Hence, suggestion is not accepted. 2. As regards suggestion of parent or subsidiary, Stakeholder has not submitted any rationale for proposed modification. However, Suggestion partially accepted subject to condition that the applicant shall not be eligible to seek another Grid connectivity using the same land documents based on which Grid Connectivity is sought. Modified Clause: Following proviso is inserted before the existing proviso: <i>" Provided that these documents in the name of a parent company or subsidiary company(ies) of the applicant shall also be acceptable subject to condition that the applicant shall not be eligible to seek another Grid connectivity using the same land documents based on which Grid Connectivity is sought.</i> <i>Provided further that"</i>
20	5.4	Juniper Green Energy		A generating station or RE Park Developer which is authorised as Lead Generator or Energy Storage System (ESS) by one or more generating station(s) or ESS(s) for applying for Grid Connectivity to the InSTS at a single connection point, is required to submit an agreement (model agreement as per Format - 3) duly signed between the Applicant and the other Generating Station(s) or ESS(s), as applicable.	1.It is essential that the regulations also extend to include renewable energy park developers as an eligible entity /route envisaged under Clause 5.2 of the Regulations.	1. The applicability of Procedure is already extended to Solar Park Developer, Wind Park Developer. The same is covered under Cl. 3.3 of Procedure. Further, the CERC has not adopted this provision hence, suggestion is not accepted. 2. Further, a new proviso added under Clause 6.7.1. (Please refer STU comments against Clause 3.1 above.)

Sr. No.	Clause Ref.	Name of Stakeholder	Clause as per Procedure	Submission	Explanation / rationale by stakeholder	STU's Comments
21	5.5	Avaada Energy Private Limited	<p>5.5 The Applicant implementing the Hybrid Renewable Energy Project including the Round the Clock Hybrid Project, shall be eligible to apply for the Grid Connectivity at one location only in view of the Eligibility criteria for such Hybrid Renewable Energy Project as specified in the Regulations of the Commission:</p> <p>Provided that, the Applicants implementing the Hybrid Renewable Energy Project(s)/Renewable Hybrid Generating Station(s) including Round-The-Clock (RTC) Hybrid Project complemented with power from Coal Based Thermal Power Projects, shall be eligible to apply for separate Grid Connectivity for each location based on the same LOA/LOI or PPA, for the capacity of the project not exceeding the quantum of power for which LOA/LOI has been awarded or PPA has been signed, as and when such Hybrid RE Project are allowed at different location through relevant Regulations and/or Orders of the Commission. For this purpose, the locations and capacity at each such location, duly certified by the Renewable Energy Implementing Agency notified by the Government or the distribution licensee, as the case may be, shall be submitted along with the Grid Connectivity applications.</p>	<p>5.5 The Applicant implementing the Hybrid Renewable Energy Project including the Round the Clock Hybrid Project, shall be eligible to apply for the Grid Connectivity at one location only in view of the Eligibility criteria for such Hybrid Renewable Energy Project as specified in the Regulations of the Commission:</p> <p>Provided that, the Applicants implementing the Hybrid Renewable Energy Project(s)/Renewable Hybrid Generating Station(s) including Round-The-Clock (RTC) Hybrid Project complemented with power from Coal Based Thermal Power Projects, shall be eligible to apply for separate Grid Connectivity for each location based on the same LOA/LOI or PPA, or on the basis of fulfilling the criterion under clause 5.2.6(b)/ 5.2.6(c)/ 5.2.7(b)/ 5.2.7(c) for the capacity of the project quantum of power to be interchanged with the InSTS, not exceeding the quantum of power for which LOA/LOI has been awarded or PPA has been signed, as and when such Hybrid RE Project are allowed at different location through relevant Regulations and/or Orders of the Commission. For this purpose, the locations and capacity at each such location, duly certified by the Renewable Energy Implementing Agency notified by the Government or the distribution licensee, as the case may be, shall be submitted along with the Grid Connectivity applications.</p>	<ol style="list-style-type: none"> The provision allowing multi location project should not be restricted to RE + Coal alone. Similarly, allowing multi-location project only for projects under LOA/LOI/PPA (that is, the projects covered under clause 5.2.6(a) or 5.2.7(a)), while not allowing for projects covered under 5.2.6(b)/ 5.2.6(c)/ 5.2.7(b)/ 5.2.7(c), would be discriminatory, and therefore not justified. For Hybrid projects, the relevant parameter is the power to be interchanged with InSTS, which is not the same as the installed capacity. There is no rationale in seeking certification from REIA or distribution licensee about the location of the project LOA/LOI/PPA with utility need not be the only mode of offtake for Hybrid projects. Developers may set-up hybrid projects for sale under various modes of Open Access as well. 	<ol style="list-style-type: none"> The clause in the present form is in line with the approved RE Grid connectivity Procedure for Gujarat. The rationale in seeking certification in case of multi-located RE projects from REIA or distribution licensee about the location of the project is in line with CERC Regulations. The proposed clause in the present form is forward looking and subject to approval of such arrangement by the Hon'ble MERC through relevant regulations and/or Orders. By including term 'with storage' scope of multi-location is increased. Also, while LOI based applicability is removed from modified clause but applicability based on PSA is also included. Further, Connectivity related suggestions are addressed by including following additional clause separately in the Procedure: <i>"An Applicant, which are Renewable Energy Generating Stations shall apply for grant of Connectivity to the InSTS for the quantum equal to the installed capacity of the generating station: Provided that if such an applicant is a Hybrid Renewable Energy Project or Hybrid Renewable Energy Project with storage, it may apply for grant of Connectivity at least for the installed capacity of the wind or solar capacity, whichever is higher or upto the total installed capacity.."</i> Accordingly, Suggestions are partially accepted. Modified clause 5.5. is as under.
22	5.5	Avaada Energy Private Limited				<p>Modified Clause:</p> <p>5.5 The Applicant implementing the Hybrid Renewable Energy Project with storage including the Round the Clock Hybrid Project with storage, shall be eligible to apply for the Grid Connectivity at one location only in view of the Eligibility criteria for such Hybrid Renewable Energy Project as specified in the Regulations of the Commission:</p> <p>Provided that, the Applicants implementing the Hybrid Renewable Energy Project(s) with storage /Renewable Hybrid Generating Station(s) including Round-The-Clock (RTC) Hybrid Project complemented with power from Coal Based Thermal Power Projects with storage, shall be eligible to apply for separate Grid Connectivity for each location based on the same LOA /LOI or PPA or PSA, for the capacity of the project not exceeding the quantum of power for which LOA /LOI has been awarded or PPA or PSA has been signed, as and when such Hybrid RE Project are allowed at different location through relevant Regulations and/or Orders of the Commission. For this purpose, the locations and capacity at each such location, duly certified by the Renewable Energy Implementing Agency notified by the Government or the distribution licensee, as the case may be, shall be submitted along with the Grid Connectivity applications.</p>

Sr. No.	Clause Ref.	Name of Stakeholder	Clause as per Procedure	Submission	Explanation / rationale by stakeholder	STU's Comments
23	5.5	Renew Private Limited	Pl. refer clause above	We request the Ld. MSETCL to kindly clarify that under the category of hybrid generating plants, RE resources such as Wind turbine generators (WTG) and Solar PV systems and any other RE based generating plants with PSPs and/or BESS or any commercially viable storage technology shall be configured to operate at the same point of grid connection or they are allowed to operate at different point of grid connection for Hybrid RE projects at different locations. Further, we request the Ld. MSETCL to please elaborate the detail provisions with examples for Hybrid RE projects at different locations so that there is no confusion within the stakeholders.		Please refer STU comments against Clause 5.5 along with modified Clause.
24	5.5	Tata Power	Pl. refer clause above	Hybrid / RTC applicants should be allowed for multi locational plants and connectivity		Please refer STU comments against Clause 5.5 along with modified Clause.
25	5.5	Reliance	Pl. refer clause above	Leverage needs to be provided for Hybrid RE projects including RTC for which application to be considered in different location at least 2 locations as the Wind and Solar potential geographically varies across the state.		Please refer STU comments against Clause 5.5 along with modified Clause.
26	6.3	Avaada Energy Private Limited	6.3 In cases once an application has been submitted and thereafter there has been any material change in the location of the applicant or change, by more than ten percent (10%) in the quantum of power to be interchanged with the InSTS and or change in the installed capacity, the applicant shall make a fresh application, which shall be considered in accordance with these Regulations and procedures.	6.3 In cases once an application has been submitted and thereafter there has been any material change in the location of the applicant, in such a way that the it leads to a change in the proposed location of Transmission Licensee's substation , or change, by more than ten percent (10%) in the quantum of power to be interchanged with the InSTS and or change in the installed capacity , the applicant shall make a fresh application, which shall be considered in accordance with these Regulations and procedures.	1. It has been rightly mentioned as "material change", and accordingly the suggested phrase would bring more clarity. So long as the substation is not changed, but only the location of RE project is shifted within the same vicinity, such change is not a material change. 2. So long as the quantum of power to be interchanged with the InSTS remains unchanged, it should not amount to change in Connectivity. Due to various technical/ implementation challenges, or even terms & conditions of off-taker, the project configuration might get changed w/o changing the ultimate quantum of power to be interchanged with the InSTS.	Suggestion partially accepted by removing the words 'and or change in the installed capacity' and by aligning it with the MERC (Transmission Open Access) Regulations, 2016. Modified Clause 6.3: "6.3 In cases once an application has been submitted and thereafter there has been any material change in the location of the applicant or change, by more than ten percent (10%) in the quantum of power to be interchanged with the InSTS and or change in the installed capacity , the applicant shall make a fresh application, which shall be considered in accordance with these Regulations and procedure s."
27	6.3	Juniper Green Energy	6.3 In cases once an application has been submitted and thereafter there has been any material change in the location of the applicant or change, by more than ten percent (10%) in the quantum of power to be interchanged with the InSTS and or change in the installed capacity, the applicant shall make a fresh application, which shall be considered in accordance with these Regulations and procedures.	6.3 In cases once an application has been submitted and thereafter there has been any material change in the location of the applicant, or change, by more than ten percent (10%) in the quantum of power to be interchanged with the InSTS and or change in the installed capacity , the applicant shall make a fresh application, which shall be considered in accordance with these Regulations and procedures.	We suggest removing the limitation prescribed in this procedure, which is not in line with the MERC TOA Regulations. It is submitted that project developers should be allowed to install additional capacity keeping the grid connectivity quantum same. This helps in optimal utilization of connectivity and transmission infrastructure.	Suggestion is accepted by removing the words 'and or change in the installed capacity' and by aligning it with the MERC (Transmission Open Access) Regulations, 2016.

Sr. No.	Clause Ref.	Name of Stakeholder	Clause as per Procedure	Submission	Explanation / rationale by stakeholder	STU's Comments
28	6.4	Reliance	6.4 In cases where once an application for Grid Connectivity is Submitted and thereafter there is a change in the location of the RE project and change of not more than 10% in the quantum of power to be interchanged with InSTS keeping the proposed location of Transmission Licensee substation unchanged, the same shall be informed by person/applicant within seven (7) days of application. Such intimation by the person/ applicant shall not be construed as material change. The STU shall grant Grid Connectivity to such person/ applicant within thirty (30) days from the date of receipt of such application from the person/ applicant. In such a situation, the grant of Grid Connectivity shall be construed from the original date of application of Grid Connectivity.	Since the clause deals with the non-material changes and such non-material changes could occur at any point of time before grant of connectivity, the 7 days limits from date of application should be done away with.		<p>1. As the specified timeline for grant of Grid Connectivity is within 30 days therefore timely intimation is necessary, so that the same can be taken into consideration. Further, it is mere intimation and not necessarily submission of any information. Hence, suggestion is not accepted.</p> <p>2. The clause is slightly modified to as produced below. It is to note that Non-material change means change in location of the project keeping the proposed location of Transmission Licensee substation unchanged.</p> <p>Clause 6.4 slightly modified: <i>" 6.4 In cases where once an application for Grid Connectivity is submitted and thereafter there is a non-material change in the location of the RE project and change of not more than 10% in the quantum of power to be interchanged with InSTS keeping the proposed location of Transmission Licensee substation unchanged, the same shall be informed by person/applicant within seven (7) days of application. Such intimation by the person/ applicant shall not be construed as material change...."</i></p>
29	6.4	Juniper Green Energy	6.4 In cases where once an application for Grid Connectivity is Submitted and thereafter there is a change in the location of the RE project and change of not more than 10% in the quantum of power to be interchanged with InSTS keeping the proposed location of Transmission Licensee substation unchanged, the same shall be informed by person/applicant within seven (7) days of application. Such intimation by the person/applicant shall not be construed as material change. The STU shall grant Grid Connectivity to such person/ applicant within thirty (30) days from the date of receipt of such application from the person/ applicant. In such a situation, the grant of Grid Connectivity shall be construed from the original date of application of Grid Connectivity.	In cases where once an application for Grid Connectivity is Submitted and thereafter there is a change in the location of the RE project and change of not more than 10% in the quantum of power to be interchanged with InSTS keeping the proposed location of Transmission Licensee substation unchanged, the same shall be informed by person/applicant within Thirty (30) days of application. Such intimation by the person/applicant shall not be construed as material change. The STU shall grant Grid Connectivity to such person/ applicant within thirty (30) days from the date of receipt of such application from the person/ applicant. In such a situation, the grant of Grid Connectivity shall be construed from the original date of application of Grid Connectivity.	The timelines to be relaxed to Thirty Days of application as it will give appropriate and reasonable time to the applicant for the same.	<p>1. As the specified timeline for grant of Grid Connectivity is within 30 days therefore timely intimation is necessary, so that the same can be taken into consideration. Further, it is mere intimation and not necessarily submission of any information. Hence, suggestion is not accepted.</p> <p>2. The clause is slightly modified to as produced below. It is to note that Non-material change means change in location of the project keeping the proposed location of Transmission Licensee substation unchanged.</p> <p>Clause 6.4 slightly modified: <i>" 6.4 In cases where once an application for Grid Connectivity is submitted and thereafter there is a non-material change in the location of the RE project and change of not more than 10% in the quantum of power to be interchanged with InSTS keeping the proposed location of Transmission Licensee substation unchanged, the same shall be informed by person/applicant within seven (7) days of application. Such intimation by the person/ applicant shall not be construed as material change...."</i></p>
30	6.5	Avaada Energy Private Limited	6.5 The Applicants who have been granted Grid Connectivity to InSTS for the generation capacity based on particular renewable energy source(s) may, for the same generation capacity, change to another renewable energy source(s) in part or full, subject to the approval of STU, keeping in view of the outcome of system studies. In such cases, the persons/applicants shall submit the No Objection Certificate from MEDA, Technical Data for changed renewable energy source(s) and STU/MSETCL shall incorporate the necessary change in the Connection Agreement.	6.5 The Applicants who have been granted Grid Connectivity to InSTS for the generation capacity based on particular renewable energy source(s) may, for the same generation capacity, change to another renewable energy source(s) in part or full, subject to the approval of STU, keeping in view of the outcome of system studies. In such cases, the persons/applicants shall submit the No Objection Certificate from MEDA, Technical Data for changed renewable energy source(s) and STU/MSETCL shall incorporate the necessary change in the Connection Agreement. Provided that this provision shall also be applicable for the applicants already granted Grid Connectivity.		<p>The new clause for applicants undertaking 'Wind Re-Powering and/ or Conversion to Hybrid Renewable Energy Project beyond Final Grant of Grid Connectivity' have been incorporated separately. Hence, suggestion is accepted.</p>

Sr. No.	Clause Ref.	Name of Stakeholder	Clause as per Procedure	Submission	Explanation / rationale by stakeholder	STU's Comments
31	6.5	Juniper Green Energy	The Applicants who have been granted Grid Connectivity to InSTS for the generation capacity based on particular renewable energy source(s) may, for the same generation capacity, change to another renewable energy source(s) in part or full, subject to the approval of STU, keeping in view of the outcome of system studies. In such cases, the persons/applicants shall submit the No Objection Certificate from MEDA, Technical Data for changed renewable energy source(s) and STU/MSETCL shall incorporate the necessary change in the Connection Agreement.	The Applicants who have been granted Grid Connectivity to InSTS for the generation capacity based on particular renewable energy source(s) may, for the same generation capacity, change to another renewable energy source(s) in part or full, subject to the approval of STU, keeping in view of the outcome of system studies. In such cases, the persons/applicants shall submit the No Objection Certificate from MEDA , Technical Data for changed renewable energy source(s) and STU/MSETCL shall incorporate the necessary change in the Connection Agreement.	As per the current practice of MSETCL there is no requirement of NoC from MEDA for the energy source change. We request that the NoC requirement from MEDA to be done away with for the ease of business. The Technical Data requirements from generators for changed energy source to be clearly outlined in the procedure.	As per RE Policy - all Non-conventional projects required to be registered with MEDA. Hence, suggestion is not accepted.
32	6.7	Avaada Energy Private Limited	6.7 Change of Name and/ or Transfer of ownership of projects: 6.7.1 Grid connectivity is not transferrable. It is applicable only to the applicant. In case of Wind, Solar or Hybrid Power Projects, where there are multiple investors owning different generation capacities and connected to common evacuation infrastructure which is developed by the applicant, the Grid Connectivity will be applicable to the applicant and such investors, however, no separate grid connectivity shall be issued to the individual investor.	6.7 Change of Name and/ or Transfer of ownership of projects: 6.7.1 Grid connectivity is not transferrable. It is applicable only to the applicant. In case of Wind, Solar or Hybrid Power Projects, where there are multiple investors owning different generation capacities and connected to common evacuation infrastructure which is developed by the applicant, the Grid Connectivity will be applicable to the applicant and such investors, however, no separate grid connectivity shall be issued to the individual investor. Notwithstanding the above, grid connectivity granted to an entity may be transferred to its Subsidiary / Affiliate / Group Entity.	Similar provisions are there in the CERCs Regulations	1. CERC Regulations does not permit 'transfer of Connectivity' but only its utilisation by parent/subsidiary. 2. Hence, suggestion partially accepted and accordingly, modified clause is as under: Modified Clause 7.1: <i>"6.7.1 Grid Connectivity is not transferrable except as provided under Clause 6.7.3(b) . It is applicable only to the applicant. In case of Wind, Solar or Hybrid Power Projects, where there are multiple investors owning different generation capacities and connected to common evacuation infrastructure which is developed by the applicant, the Grid Connectivity will be applicable to the applicant and such investors, however, no separate grid connectivity shall be issued to the individual investor:</i> <i>Provided that Grid Connectivity granted to a parent company may be utilized by its subsidiary company(ies) and Grid Connectivity granted to a subsidiary may be utilized by its parent company:</i> <i>Provided further that where RE Park Developer (as declared in the application for connectivity) developing the infrastructure facilities for the RE Projects to be established in the RE Park obtains connectivity for evacuation of power from RE projects</i>
33	6.7	JSW	Grid connectivity is not transferrable. It is applicable only to the applicant. In case of Wind, Solar or Hybrid Power Projects , where there are multiple investors owning different generation capacities and connected to common evacuation infrastructure which is developed by the applicant, the Grid Connectivity will be applicable to the applicant and such investors, however, no separate grid connectivity shall be issued to the individual investor.	Permitting transfer and utilization of Connectivity by Subsidiary company(ies) as per CERC – Revised Procedure for “Grant of Connectivity to projects based on Renewable Sources to inter-State transmission system”		

Sr. No.	Clause Ref.	Name of Stakeholder	Clause as per Procedure	Submission	Explanation / rationale by stakeholder	STU's Comments
34	6.7.1	Tata Power	Grid connectivity is not transferrable. It is applicable only to the applicant. In case of Wind, Solar or Hybrid Power Projects, where there are multiple investors owning different generation capacities and connected to common evacuation infrastructure which is developed by the applicant, the Grid Connectivity will be applicable to the applicant and such investors, however, no separate grid connectivity shall be issued to the individual investor.	In case a developer needs to use the connectivity of Connectivity Applicant, suitable guidelines and format for using such connectivity to be provided		<p><i>located in the RE Park, such arrangement between the RE Park Developer and the RE Projects shall not be in breach of the above and the connectivity so taken by the RE Park Developer shall be deemed to be on behalf of the RE Projects also for all intents and purposes. The RE Park Developer shall be required to declare the intent at the time of filing of the application for Connectivity:</i></p> <p><i>Provided also that where under any scheme duly declared in the application for connectivity, the RE Developer develops the RE Projects in aggregate, with Connectivity to the Grid taken by the RE Developer with intent to allocate, transfer and assign individual RE Projects to identified entities, such arrangement between the RE Developer and the RE Projects shall not be in breach of the above and the connectivity so taken by the RE Developer shall also be deemed to be on behalf of the RE Projects also.</i></p>
35	6.7.2	Tata Power	6.7.2 As per the Government of Maharashtra, Renewable Energy Policy, 2020 in case of a Change of name/transfer of ownership/address change of RE power project etc., an applicant has to apply separately on MEDA Single Window Web Portal as per the procedure prescribed therein. The applicant may refer to following relevant extract: a) In case of projects set up under Competitive Bidding with MSEDCL/MSPGCL – Transfer of ownership/ Change of name can be done if permitted under the ambit of PPA. In such cases, No Objection Certificate from MSEDCL/MSPGCL shall be required.	The scope to also include other private Gencos and Discom Licensees within the state		<p>This Procedure has been aligned with GoM RE Policy. It is to note that changes in GoM RE Policy are not envisaged through this Procedure.</p> <p>Hence, suggestion is not accepted.</p>
36	6.7.3.b	Juniper Green Energy	6.7.3. Additionally, in case of a Change of name/transfer of ownership/address change of the RE power project of the Person/Applicant who has been granted Grid Connectivity to InSTS, an applicant shall apply to STU in the manner provided below: b) Transfer of ownership: i. After issuance of Intimation Letter or Grid Connectivity, if the Original applicant/ company/firm etc.is fully acquired by any other applicant/company/firm etc. then such other person applicant/company/firm etc. shall be the 2nd and new applicant who in terms of Renewable Energy Policy, 2020, shall be required to seek permission from STU towards utilization of the same Grid Connectivity. In such case, the 2nd and new applicant will have to make a fresh application, along with the documents in support of such acquisition of assets from the competent authorities, which shall be considered in accordance with these Regulations and procedures.	<p>Additionally, in case of a Change of name/transfer of ownership/address change of the RE power project of the Person/Applicant who has been granted Grid Connectivity to InSTS, an applicant shall apply to STU in the manner provided below:</p> <p>b) Transfer of ownership: i. After issuance of Intimation Letter or Grid Connectivity, if the Original applicant/ company/firm etc.is fully acquired by any other applicant/company/firm etc. then such new person applicant/company/firm etc. shall be permitted to utilise the 2nd and new applicant who in terms of Renewable Energy Policy, 2020, shall be required to seek permission from STU towards utilization of the same Grid Connectivity. In such case, the 2nd and new applicant will have to make a fresh application, along with the documents in support of such acquisition of assets from the competent authorities, which shall be considered in accordance with these Regulations and procedures.</p>	<p>We request that in case of Transfer of ownership where the original applicant is fully acquired by another applicant/company/firm etc., then the new person/applicant/company/firm, etc. should not require any additional/fresh application to be submitted to the authorities for the utilization of same grid connectivity since this does not involve any additional quantum of power to be interchanged. Our suggestion is in line with the practice being followed in case of CERC GNA regulations.</p>	<p>1. CERC Regulations does not permit 'transfer of Connectivity'. As per CERC Regulations, in case of acquisition, one has to apply for revised grant of connectivity.</p> <p>2. Further, the practice cannot be different for processing of Grid Connectivity application for conventional generators and RE i.e. non-conventional generators</p> <p>Hence, suggestion is not accepted.</p>

Sr. No.	Clause Ref.	Name of Stakeholder	Clause as per Procedure	Submission	Explanation / rationale by stakeholder	STU's Comments
37	6.7.3.b.i	Reliance	After issuance.....shall be the 2nd and new applicant..... In such cases, the 2nd and new applicant will have to make a fresh application.....with these Regulations and procedures.	As the clause deals with the Transfer of the ownership, same should be allowed without needing a fresh application. Since the transfer of ownership always results in transfer of rights and obligation, the new applicant will remain obligated to fulfil the conditions and comply the terms of this procedure for which the original applicant was obligated		1. CERC Regulations does not permit 'transfer of Connectivity'. As per CERC Regulations, in case of acquisition, one has to apply for revised grant of connectivity. 2. Further, the practice cannot be different for processing of Grid Connectivity application for conventional generators and RE i.e. non-conventional generators Hence, suggestion is not accepted.
38	6.8	Avaada Energy Private Limited	6.8 In all aforementioned cases, necessary actions in accordance with this Procedure shall be initiated by the person/applicant within seven (7) calendar days of such change. Failure to act upon such change shall be considered as non-compliance and in such cases, STU shall take appropriate actions, with the approval of the Competent Authority/Hon. Commission.	6.8 In all aforementioned cases, necessary actions in accordance with this Procedure shall be initiated by the person/applicant within seven (7) thirty (30) calendar days of such change. Failure to act upon such change shall be considered as non-compliance and in such cases, STU shall take appropriate actions, with the approval of the Competent Authority/Hon. Commission.	Seven days is too short a period, since this involves various government functionaries and related documentation which is very time consuming and not in control of the applicant.	The clause states that ' necessary actions in accordance with this Procedure shall be initiated by the person/ applicant within seven (7) calendar days of such change.' As the specified timeline for grant of Grid Connectivity is within 30 days therefore timely intimation is necessary, so that the same can be taken into consideration. Further, it is mere intimation and not submission of any information. Further, in view of suggestion received, this clause is shifted before Clause 6.5. Hence, suggestion is partially accepted.
39	7	Avaada Energy Private Limited	7. Processing of Application and grant of Grid Connectivity	It would be very helpful if a process flow-chart or table is included, duly indicating the agency responsible for the activity and timelines for completing the activity.		A Process flow-chart on similar lines with the one that was published for the existing Procedure shall be included. Hence, suggestion is accepted.
40	7.1	Aditya Birla Renewables	New clause after 7.1	In case of Wind-Solar Hybrid projects set up for Captive use or third party sale, configured to operate at the same point of grid connection, the RE Developer / consumer shall be required to seek grant of connectivity capacity of at least the installed capacity of the wind or solar capacity, whichever is higher. However, RE developer / consumer may seek higher grant of connectivity capacity, up to a maximum of combined installed capacity of wind and solar hybrid projects. Provided that such hybrid project(s) must give the common scheduling and forecasting for the Wind and Solar Project(s) and further at any point of time should not exceed the PE capacity allocated jointly between Wind and Solar Project(s). Provided that the sizing of the wind/solar capacity would be assessed by the developer on the basis of local resource characteristics. However, a wind solar power plant will be recognized as hybrid plant if the rated power capacity of one resource (wind/solar) is at least 25% of the rated power capacity of other resource (solar/wind).	This is in line with the intent of MNRE Wind – Solar Hybrid Policy. Many states like Gujarat, Rajasthan, Madhya Pradesh, Andhra Pradesh etc. are already allowing the connectivity to hybrid projects as per this mechanism, wherein the requirement of transmission capacity / connectivity is equal to installed capacity of wind or solar project, whichever is higher. There is no requirement of transmission capacity / connectivity as a sum of installed solar and wind capacity as it defeats the whole purpose and advantages which can be derived from hybrid projects highlighted as under: - For the same transmission infrastructure in terms of MW, more energy can be injected into the grid, as wind and solar is injecting at the same interconnection in the STU grid. Moreover, proper control system shall be installed such that maximum injected power does not exceed 50 MW (connectivity availed is less than total installed capacity of wind and solar) - This leads to better utilization of Transmission infrastructure. More transmission charges received by the STU as more energy (MU) shall be injected at the same point of grid connectivity - Enabling more MW of installed capacity for the same transmission infrastructure	1. Suggestion is partially accepted and accordingly, following additional clause included in the Procedure: <i>"An Applicant, which are Renewable Energy Generating Stations shall apply for grant of Connectivity to the INSTS for the quantum equal to the installed capacity of the generating station: Provided that if such an applicant is a Hybrid Renewable Energy Project or Hybrid Renewable Energy Project with storage, it may apply for grant of Connectivity at least for the installed capacity of the wind or solar capacity, whichever is higher or upto the total installed capacity."</i> 2. As regards suggestion on scheduling & forecasting, as mentioned in Clause 8.2 the same shall be governed by the relevant regulations. 3. As regards resource configuration for qualification as Hybrid, the same has already mentioned in the Clause 3.1 (c) in line with the Hon'ble MERC Regulations.

Sr. No.	Clause Ref.	Name of Stakeholder	Clause as per Procedure	Submission	Explanation / rationale by stakeholder	STU's Comments
41	7.1	Suzlon	New Clause	MSETCL shall grant the connectivity based on the capacity (MW) of the injection at POI irrespective with the install capacity of various energy sources (solar & wind)	Developer will adhere the energy sources capacities as per procedure, but MSETCL shall not insist to obtain the connectivity as per the actual install capacity. MSETCL shall consider the actual energy injection capacity at the POI (point of interconnection i.e. Grid SS) Example: 50 MW of solar with 80 MW of wind (vice-versa) with a maximum injection of 100 MW at POI shall be permitted to grant the connectivity to help RE developer in decrease the transmission losses & increase the PLF for better techno commercial projects.	The grant of connectivity shall be based on based on the Installed capacity subject to following additional clause: <i>"An Applicant, which are Renewable Energy Generating Stations shall apply for grant of Connectivity to the InSTS for the quantum equal to the installed capacity of the generating station: Provided that if such an applicant is a Hybrid Renewable Energy Project or Hybrid Renewable Energy Project with storage, it may apply for grant of Connectivity at least for the installed capacity of the wind or solar capacity, whichever is higher or uptothe total installed capacity."</i>
42		Suzlon		MSETCL shall allow to convert the existing connection agreement of Wind or Solar projects to Hybrid grid connectivity by restricting to injection capacity (MW) MSETCL shall not insist to obtain connectivity on the Energy sources Installation capacity.	Example: 50 MW of solar with 80 MW of wind (vice-versa) with a maximum injection of 100 MW at POI shall be permitted to grant the connectivity to help RE developer in decrease the transmission losses & increase the PLF for better techno commercial projects.	The grant of connectivity shall be based on based on the Installed capacity subject to following additional clause: <i>"An Applicant, which are Renewable Energy Generating Stations shall apply for grant of Connectivity to the InSTS for the quantum equal to the installed capacity of the generating station: Provided that if such an applicant is a Hybrid Renewable Energy Project or Hybrid Renewable Energy Project with storage, it may apply for grant of Connectivity at least for the installed capacity of the wind or solar capacity, whichever is higher or uptothe total installed capacity."</i> Hence, Suggestion is not accepted.
43	7.2	Avaada Energy Private Limited	7.2 The priority for grant of Grid Connectivity to certain applications:	More clarity required, as explained.	The priority has been severally defined under 7.2.1, 7.2.2, 7.2.3, and 7.2.4, and all are based on separate criterion. It is essential to define the unified order of priority encompassing all criteria. Therefore, requesting to include a priority matrix in form of a list.	In order to bring clarity few minor changes incorporated in Procedure. Also, in order to reduce complexities, Clause 7.2.4 removed. (Further this clause is also not included in GoM Policy.) Hence, Suggestion is partially accepted.
44	7.2.3	Renew Private Limited		In exercise of the powers conferred by the Energy Conservation Act, 2001, in consultation with the Bureau of Energy Efficiency ("BEE"), MoP vide notification dated 20 October 2023 has specified targets for minimum share of source-wise consumption through Renewable Power by Designated consumers. These targets are to be complied by individual designated consumers on their own and DISCOM is not obligated to comply on designated consumers' behalf. Thus, such consumers are required to be put at par with DISCOMs since they are equally obligated entities despite being connected with DISCOM. In view of the above, we accordingly suggest the following amendments with regards to the priority for applying grant of Connectivity at one sub-station by more than one developer:		This Procedure has been aligned with GoM RE Policy. It is to note that changes in GoM RE Policy are not envisaged through this Procedure. Hence, suggestion is not accepted.

Sr. No.	Clause Ref.	Name of Stakeholder	Clause as per Procedure	Submission	Explanation / rationale by stakeholder	STU's Comments
45	7.2.3	Renew Private Limited	7.2.3 As per the Government of Maharashtra, Renewable Energy Policy, 2020, in case of more than one developer applying for a grant of Grid Connectivity at one sub-station priority shall be as follows: a. First priority: Projects having a Power Purchase Agreement (PPA) entered into with — electricity distribution companies in the State, Government/ semi-government implementation agencies and having 50% or more availability of land area required for the capacity of the project. b. Second Priority: Projects having PPA entered into with - electricity distribution companies in the State, power utilities companies, also projects of Central government/state government implementing agencies/ Maharashtra State Power Generation Company Ltd. (MSPGCL)/ NTPC Ltd., but with no availability of land area required for the capacity of project. c. Third Priority: Projects for self-use and projects having 50% or more availability of land area required for the capacity of the project. d. Fourth Priority: Projects for self-use and third-party sale of power but with no availability of land area required for the capacity of the project.	"7.2.3... a. First Priority: Projects having a Power Purchase Agreement (PPA) entered into with- electricity distribution companies in the State, Government/ Semi-Government implementation agencies/ designated consumers under Energy Conservation Amendment Act, 2022 for self-use or third-party sales and having 50% or more availability of land area required for the capacity of the project. b. Second Priority: Projects having a Power Purchase Agreement (PPA) entered into with- electricity distribution companies in the State, power utilities companies, also projects of Central Government/ State Government implementation agencies/ Maharashtra State Power Generation Company Ltd. (MSPGCL)/ NTPC Ltd. designated consumers under Energy Conservation Amendment Act, 2022 for self-use or third-party sales but with no availability of land area required for the capacity of the project. c. Third Priority: Other Projects for self-use and projects having 50% or more availability of land area required for the capacity of the project not falling under first and second priority. d. Fourth Priority: Other Projects for self-use and third party sale of power but with no availability of land area required for the capacity of the project not falling under first and second priority... "		This Procedure has been aligned with GoM RE Policy. It is to note that changes in GoM RE Policy are not envisaged through this Procedure. Hence, suggestion is not accepted.
46	7.2.3	Suzlon	Pl. refer clause above	1. Priority of Processing of application need to modified as first come first basis only. 2. And also point (c) shall be modified as "Third Priority: Projects for self-use and third party open access projects having 50% or more availability of land area required for the capacity of the project.	(a) As on date state RE tenders are getting cancelled even after letter of award (LOA) due to grid connectivity & PPA issues. (b) As per the current central grid connectivity procedures priority will be considered on first come first basic (online application with date & stamps to be considered. Justification for Point (C) modification: third party open access generators also fall under this category Eg. The above generators will also have land banks shall also to be considered in this priority	This Procedure has been aligned with GoM RE Policy. It is to note that changes in GoM RE Policy are not envisaged through this Procedure. Hence, suggestion is not accepted.
47	7.2.3	Suzlon	Pl. refer clause above	3. Additional connectivity priority / criteria - connectivity also be given to RE project Developer also	RE project developer shall be allowed to take the connectivity in the name of developer with multiple captive and third party open access customers to fulfil the RPO obligations of small capacity captive and third party open access generators with common	This Procedure has been aligned with GoM RE Policy. It is to note that changes in GoM RE Policy are not envisaged through this Procedure. Hence, suggestion is not accepted.
48	7.2.3	Tata Power	Pl. refer clause above	Priority of allocation to also include Open Access & Group Captive projects		This Procedure has been aligned with GoM RE Policy. It is to note that changes in GoM RE Policy are not envisaged through this Procedure. Hence, suggestion is not accepted.

Sr. No.	Clause Ref.	Name of Stakeholder	Clause as per Procedure	Submission	Explanation / rationale by stakeholder	STU's Comments
49	7.2.3	Avaada Energy Private Limited		7.2.3 As per the Government of Maharashtra, Renewable Energy Policy, 2020 ; In case of more than one developer applying for a grant of Grid Connectivity at one sub-station priority shall be as follows: a. First priority: Projects having a Power Purchase Agreement (PPA) entered into with – electricity distribution companies in the State, Government/ semi-government implementation agencies and having 50% or more availability of land area required for the capacity of the project. b. Second Priority: Projects having PPA entered into with - electricity distribution companies in the State, power utilities companies, also projects of Central government/State government implementing agencies/ Maharashtra State Power Generation Company Ltd. (MSPGCL)/ NTPC Ltd., but with no availability of land area required for the capacity of project c. Third Priority: Projects for self-use captive use, third-party sale, or merchant sale , and projects which are having 50% or more availability of land area required for the capacity of the project. d. Fourth Priority: Projects for self-use captive use, and third-party sale, or merchant-sale of power but with no availability of land area required for the capacity of the project.	1. Since this Procedure is now going to be approved by MERC, with a purpose to introduce suitable refinements. Therefore, keeping the provision of old Methodology in a verbatim manner, will defeat the very purpose of introducing new Procedure. 2. Language corrections suggested to bring more clarity	This Procedure has been aligned with GoM RE Policy. It is to note that changes in GoM RE Policy are not envisaged through this Procedure. Hence, suggestion is not accepted. However, as suggested, the term 'self-use' mentioned in the GoM Policy shall be construed as 'captive use' while processing the applications.
50	7.3	Avaada Energy Private Limited	7.3 On receipt of an application, the STU shall ask the applicant and the concerned transmission licensee in whose area the project is being proposed to carry out a joint survey and submit a Technical Feasibility Report towards possible schemes required for interconnection of the project with InSTS.	7.3 On receipt of an application, the STU shall carry out surveys, feasibility studies, load flow studies, or any other study as may be required, either on its own or with assistance of the concerned transmission licensee in whose area the project is being proposed, and finalize the tentative evacuation arrangement required for interconnection of the project with InSTS within a period of 30 days from the date of application.	Technical Feasibility Report and Load Flow Studies are matters internal to the STU/transmission licensee. The onus of carrying out TFR should not be upon the applicant. Also, there is no need for carrying out "Joint Surveys". Such practices do not exist under Connectivity Procedures of CERC and various other States.	1. The present practice adopted in the state is evolved based on experiences and state specific issues. 2. Joint visits/ present practice is required on account of following : a. Range/variety of grid connectivity applications are received such as Radial/LILO connectivity. In case of LILO connectivity, feasibility need to be verified at site. b. Site verification is required for checking bay availability at substation end, identifying any other issues such as Land, RoW issues, etc. c. Identification of above issues and ascertaining of the same can not be done solely at STU end. d. Further, Joint survey also help in ensuring transparency apart from reaching agreement on conditions/cause. e. Further, the practice cannot be different for processing of Grid Connectivity application for conventional generators and RE i.e. non-conventional generators Hence, suggestion is not accepted.
51	7.4	Avaada Energy Private Limited	7.4 If the applicant has made a delay towards arranging a joint site visit with STU representatives (for Technical Feasibility Report), the days lapsed for such delay shall not be considered within the target time limit of thirty (30) days for issuance of Grid Connectivity.			
52	7.5	Avaada Energy Private Limited	7.5 After receipt of the Technical Feasibility Report, the STU shall undertake a Load Flow Study and finalize the tentative evacuation arrangement which is to be constructed by the applicant and point of connection to InSTS.			
53	7.6	Tata Power		The system strengthening work beyond point of interconnection (POI) shall be carried out by the Transmission Utility and not to be asked to developer or Grid Connectivity applicant.		Stakeholder suggestion is already addressed in Clause 7.7 of the Procedure.

Sr. No.	Clause Ref.	Name of Stakeholder	Clause as per Procedure	Submission	Explanation / rationale by stakeholder	STU's Comments
54	7.6	Avaada Energy Private Limited	7.6 All applications received shall be treated in order of date of receipt of application. The STU will process and finalize the application within thirty (30) days after its receipt through conducting load flow studies for examining technical feasibility and to finalize other details like establishing the requirement of the bay, availability of space for construction for the bay, details of transmission lines, works required for system strengthening and then convey it to concerned Transmission/Distribution Licensee under intimation of the applicant:	7.6 All applications received shall be treated in order of date of receipt of application, and all the applications received shall be displayed on the portal of STU along with time-stamp of the application and all other details. The STU will process and finalize the application within thirty (30) days after its receipt through conducting load flow studies for examining technical feasibility and to finalize other details like establishing the requirement of the bay, availability of space for construction for the bay, details of transmission lines, works required for system strengthening and then convey it to concerned Transmission/Distribution Licensee under intimation of the applicant:	For bringing transparency. Such practice is also followed under CERC's Connectivity Procedure. In its Order dated 19 September 2019 in Case No. 235 of 2019, MERC has also directed STU to formulate procedures after considering CERC's procedures.	Suggestion is accepted and accordingly, the clause is modified as under: Modified clause: <i>"7.6 All applications received shall be treated in order of date of receipt of application. The STU shall publish on its official website, on the first day of each calendar month details of all applications received. The STU will process and finalize the application within thirty (30) days after its receipt through conducting load flow studies for examining technical feasibility and to finalize other details like establishing the requirement of the bay, availability of space for construction for the bay, details of transmission lines, works required for system strengthening and then convey it to concerned Transmission/ Distribution Licensee under intimation of the applicant:</i> ..."
55	7.6	Juniper Green Energy	All applications received shall be treated in order of date of receipt of application. The STU will process and finalize the application within thirty (30) days after its receipt through conducting load flow studies for examining technical feasibility and to finalize other details like establishing the requirement of the bay, availability of space for construction for the bay, details of transmission lines, works required for system strengthening and then convey it to concerned Transmission/Distribution Licensee under intimation of the applicant: Provided that before finalizing the application, on the last working day of the month STU shall review other received and open application(s) for their priority for grant of Grid Connectivity, such that the application under consideration shall be processed and finalized within thirty (30) days from the date of its receipt including completion of all activities such as load flow studies and finalization of other details	All applications received shall be treated in order of date of receipt of application. Priority for processing the applications received in the same month shall be decided, as per provisions under clause no. 7.2.4 for processing of the applications. Once the priority has been decided for the applications received in the same month, the STU will process and finalize the application within thirty (30) days after its receipt through conducting load flow studies for examining technical feasibility and to finalize other details like establishing the requirement of the bay, availability of space for construction for the bay, details of transmission lines, works required for system strengthening and then convey it to concerned Transmission/Distribution Licensee under intimation of the applicant: Provided that before finalizing the application, on the last working day of the month STU shall review other received and open application(s) for their priority for grant of Grid Connectivity, such that the application under consideration shall be processed and finalized within thirty (30) days from the date of its receipt including completion of all activities such as load flow studies and finalization of other details: ...	As per current provision, it appears that applications which have priority clause no. 7.2.4 (for instance - application based on PPA with MSEDCL) shall have priority over the application received in the preceding month which was received based on PPA with other distribution franchise of Maharashtra. We request that the priority for grant of approval shall be decided as per clause no. 7.2.4, for the applications received in the same month. This will provide equitable treatment to the applications in the given month. The above proposed methodology has also been followed in Gujarat STU Connectivity processing.	In order to bring clarity few minor changes incorporated in the Procedure. Also, in order to reduce complexities, Clause 7.2.4 removed. (Further this clause is also not included in GoM Policy.) Accordingly, Suggestion is partially accepted. Modified Clause: <i>"7.6 All applications received shall be treated in order of date of receipt of application. The STU will process and finalize the application within thirty (30) days after its receipt through conducting load flow studies for examining technical feasibility and to finalize other details like establishing the requirement of the bay, availability of space for construction for the bay, details of transmission lines, works required for system strengthening and then convey it to concerned Transmission/Distribution Licensee under intimation of the applicant: Provided that before finalizing the application, on the last working day of the month STU shall review other received and open application(s) for their priority for grant of Grid Connectivity, such that the application under consideration shall be processed and finalized within thirty (30) days from the date of its receipt including completion of all activities such as load flow studies and finalization of other details:"</i>

Sr. No.	Clause Ref.	Name of Stakeholder	Clause as per Procedure	Submission	Explanation / rationale by stakeholder	STU's Comments
56	7.7	Tata Power	7.7 During finalization of the evacuation arrangement which is to be constructed by the applicant and point of connection to the InSTS, in the event of work of system strengthening is required to be carried out on existing InSTS, then grant of Grid Connectivity is subject to submission of Grid Connectivity Bank Guarantee (BG) towards such system strengthening. In such cases, system strengthening work shall be carried out by the STU/Transmission Licensee: Provided that the applicant and Transmission Licensee shall endeavour to commission the generating station and the transmission system simultaneously as far as practicable and shall ensure the same through appropriate agreement in accordance with the Regulation 31.4.1 of the Maharashtra Electricity Regulatory Commission (State Grid Code) Regulations, 2019.	In case of delay by InSTS / STU in developing evacuation infrastructure, how will such issue be treated		Enabling provisions in Clause 7.7 and Clause 7.8 in line with existing regulatory framework approved by the Hon'ble MERC have already been incorporated in Procedure. Hence, suggestion is not acceptable.
57	7.7	Avaada Energy Private Limited		Please refer the comments/suggestions against Clause 7.9.3 herein below.		Nil. (Please refer STU comments against Clause 7.9.3)
58	7.8	Suzlon	Note: Planned InSTS sub-station means a sub-station included in the Transmission System Plan prepared by the STU. Proposed InSTS sub-station means a sub-station to be proposed in the Transmission System Plan prepared by the STU on the basis of the applications/potential area.	Need to allow for in principle grid connectivity until proposed scheme is approved. Post scheme approved final grid connectivity to be granted	Applicants can plan their in future grid connectivity's accordingly.	Suggestion is accepted and following new provision is incorporated under the Clause 7.13 of the Procedure: <i>"In case of grant of Grid Connectivity at a proposed InSTS sub-station, the start date of the 'Period for Work completion' shall be from the date of inclusion of such proposed InSTS sub-station in the Transmission System Plan prepared by STU or approval of such scheme by Hon'ble Commission, whichever is later. The STU shall intimate such start date to the applicant(s)."</i>

Sr. No.	Clause Ref.	Name of Stakeholder	Clause as per Procedure	Submission	Explanation / rationale by stakeholder	STU's Comments
59	7.8	Avaada Energy Private Limited	7.8 Based on application seeking grant of Grid Connectivity at a planned/ proposed InSTS sub-station, STU may grant such Grid Connectivity subject to submission of Grid Connectivity Bank Guarantee (BG) towards a planned/ proposed InSTS sub-station and terminal bay(s): Provided that capacity of renewable energy projects for which Grid connectivity is sought shall be at least 400 MW: Provided further that in accordance with the Regulation 31.4.1 of the Maharashtra Electricity Regulatory Commission (State Grid Code) Regulations, 2019, the applicant and Transmission Licensee shall endeavour to commission the generating station and the transmission system simultaneously as far as practicable and shall ensure the same through appropriate agreement: Provided also that the Developer/Applicant shall agree to indemnify and keep indemnified MSETCL/ STU at all times against any and all actions, claims, proceedings, suits and judgments, damages and losses, all costs, charges and expenses in case of delay in completion and commissioning of such planned/ proposed InSTS sub-station by MSETCL/Transmission Licensee. Note: 1. Planned InSTS sub-station means a sub-station included in the Transmission System Plan prepared by the STU.	7.8 Based on application seeking grant of Grid Connectivity at a planned/ proposed InSTS sub-station, STU may grant such Grid Connectivity subject to submission of Grid Connectivity Bank Guarantee (BG) towards a planned/ proposed InSTS sub-station and terminal bay(s): Provided that capacity of renewable energy projects for which Grid connectivity is sought shall be at least 400 100 MW : Provided further that in accordance with the Regulation 31.4.1 of the Maharashtra Electricity Regulatory Commission (State Grid Code) Regulations, 2019, the applicant and Transmission Licensee shall endeavour to commission the generating station and the transmission system simultaneously as far as practicable and shall ensure the same through appropriate agreement: Provided also that the Developer/Applicant shall agree to indemnify and keep indemnified MSETCL/ STU at all times against any and all actions, claims, proceedings, suits and judgments, damages and losses, all costs, charges and expenses in case of delay in completion and commissioning of such planned/ proposed InSTS sub-station by MSETCL/Transmission Licensee. Note: 1. Planned InSTS sub-station means a sub-station included in the Transmission System Plan prepared by the STU., and the exhaustive list of such Planned InSTS substations shall be displayed on STU's website and updated every month. 2. Proposed InSTS sub-station means a sub-station to be proposed in the Transmission System Plan prepared by the STU on the basis of the applications/potential area.	1. Please refer the comments/suggestions against Clause 7.9.3 herein below. 2. 400 MW is a very large capacity. Even in various bids of REIA/Discoms, the capacity awarded to a single developer is much lesser than 400 MW. Also, there will be cases of multiple applications of smaller capacity, say 100 MW, whereby the infrastructure of the transmission licensees will be getting utilized adequately.	1. In order to ensure serious participation minimum limit of 400 MW is set. Hence, suggestion is not accepted. 2. Suggestions to Note No. 1 accepted by addition of clauses as shown below. 3. An Application of applicant who intend to seek grid connectivity on proposed substation cannot be sole criteria for STU to propose a InSTS substation. Hence, in Note 2 of this clause, the term 'to be proposed' replaced by 'that may be proposed' as shown below: Modified Note to Clause 7.8: "Note: 1. <i>Planned InSTS sub-station means a sub-station included in the Transmission System Plan prepared by the STU, and list of such Planned InSTS sub-stations (i.e., included in the Transmission System Plan prepared by STU) for Renewable Energy evacuation shall be displayed on STU's website and updated every month.</i> 2. <i>Proposed InSTS sub-station means a sub-station that may be proposed in the Transmission System Plan prepared by the STU on the basis of the applications/ potential area.</i> "
60	7.8	Tata Power	Based on application seeking grant of Grid Connectivity at a planned/ proposed InSTS sub-station, STU may grant such Grid Connectivity subject to submission of Grid Connectivity Bank Guarantee (BG) towards a planned/ proposed InSTS sub-station and terminal bay(s):	Why minimum 400 MW limit is kept		In order to ensure serious participation minimum limit of 400 MW is set. Hence, suggestion is not accepted.
61	7.8	Reliance	Application seeking grant of grid connectivity at planned/proposed InSTS require to submit Grid connectivity Bank Guarantee (BG). As mentioned the capacity of renewable project for grid connectivity sought shall be at least 400MW.	The Capacity mentioned of at least 400MW is on higher side as the private land acquisition in MH is a challenge which shall delay the project and wont meet the time line of 24months at 220Kv in Table 1. Suggestion for revising the minimum capacity to 270MW at 220Kv with time line of 24months and 400MW at 400Kv where time line is 36 months.		In order to ensure serious participation minimum limit of 400 MW is set. Hence, suggestion is not accepted.
62	7.9	Avaada Energy Private Limited	7.9 After finalization of the evacuation arrangement and point of connection, as per the Renewable Energy Policy, 2020, wherever applicable, the STU shall intimate the applicant to deposit the prescribed Commitment Fee (Refundable basis) on a per MW basis with the MSETCL/Transmission Licensee and/or to furnish Grid Connectivity Bank Guarantee (BG) towards a planned/ proposed InSTS sub-station and terminal bay(s).	7.9 After finalization of the evacuation arrangement and point of connection, as per the Renewable Energy Policy, 2020, wherever applicable, the STU shall intimate the applicant to deposit the prescribed Commitment Fee (Refundable basis) on a per MW basis with the MSETCL/Transmission Licensee and or to furnish Grid Connectivity Bank Guarantee (BG) towards a planned/ proposed InSTS sub-station and terminal bay(s).	For the same capacity, there should not be a requirement to submit Commitment Fee as well as the BG.	The clause in the present form is clear and self explanatory and states that 'wherever applicable'. Hence, suggestion is not accepted.
63	7.9.1.e	Reliance	7.9.1 As per the Government of Maharashtra, Renewable Energy Policy, 2020: ... e) If the evacuation infrastructure is not completed within the stipulated time limit as per MSETCL prescribed procedure or there is no visible progress, the grid connectivity for the project shall stand cancelled and MSETCL shall seize the Commitment Fee deposited.	How the 'visible progress' is defined? And how it will be assessed?		The clause referred by the stakeholder is clause referred from GoM RE Policy. This Procedure has been aligned with GoM RE Policy. As regards progress review, the detailed Clause 9 'Progress Review' is already available in the Procedure. This clause also stipulates milestone based progress review. No further clarification required.

Sr. No.	Clause Ref.	Name of Stakeholder	Clause as per Procedure	Submission	Explanation / rationale by stakeholder	STU's Comments
64	7.9.2	Avaada Energy Private Limited	7.9.2 Hybrid Renewable Energy project based on RE technologies shall be required to deposit the prescribed Renewable Energy technology-wise Commitment Fee (Refundable basis) on a per MW basis with the MSETCL	7.9.2 Hybrid Renewable Energy project based on RE technologies shall be required to deposit the prescribed Renewable Energy technology-wise Commitment Fee (Refundable basis) on a per MW basis with the MSETCL, as per the quantum of power to be interchanged with InSTS.	As explained in earlier clauses related to Hybrid projects, against Clause 5.5 herein above.	GoM RE Policy stipulates payment of Commitment fees for Solar and Wind projects on per MW basis. This Procedure has been aligned with GoM RE Policy. It is to note that changes in GoM RE Policy are not envisaged through this Procedure. In case of Hybrid projects then such fees as stipulated by GoM shall be applicable Hence, suggestion is not accepted.
65	7.9.3.a	Avaada Energy Private Limited	7.9.3 Grid Connectivity Bank Guarantee (BG): a) For cases covered under Clause 7.7 of this procedure, STU shall intimate (i) amount of Grid Connectivity BG towards system strengthening work required to be carried out on existing InSTS, which shall not exceed estimated cost towards such works, (ii) the timeline for completion of such works, and (iii) firm date of start of Grid Connectivity: Provided that if such system strengthening works are planned for more than one applicant, Grid Connectivity BG shall be furnished in proportion to the quantum of Grid Connectivity applied for by such applicant;	1st Suggestion: There should be no requirement of such BG, since the applicant is already providing commitment fee, PBGs to the REIA/Distribution Companies, or investing in land or providing BG in lieu of land in terms of clause 5.2.6 / 5.2.7 2nd Suggestion: However, if somehow the 1st Suggestion as above is not accepted, then STU should atleast consider the following corrections: 7.9.3 Grid Connectivity Bank Guarantee (BG): a) For cases covered under Clause 7.7 of this procedure, STU shall intimate (i) amount of Grid Connectivity BG towards system strengthening work required to be carried out on existing InSTS, which shall not exceed estimated cost towards such works, or Rs Fifty Thousand per MW, whichever is lower (ii) the timeline for completion of such works, and (iii) firm date of start of Grid Connectivity: Provided that if such system strengthening works are planned for more than one applicant, Grid Connectivity BG shall be furnished in proportion to the quantum of Grid Connectivity applied for by such applicant; Provided further that, if more applicants are granted Grid Connectivity at a later stage, and accordingly the applicable BG amount gets reduced, the excess BG of the earlier applicant shall be released within thirty (30) days of receipt of BG from the later applicant.		1. In order to ensure genuineness of applicant towards development of RE project. 2. The approach adopted by CERC is incorporated in line with the Hon'ble MERC directions. Hence, suggestion is not acceptable.
66	7.9.3.b	Avaada Energy Private Limited	7.9.3 Grid Connectivity Bank Guarantee (BG): b) For cases covered under Clause 7.8 of this Procedure, STU shall intimate (i) amount of Grid Connectivity BG towards a planned/ proposed InSTS sub-station and terminal bay(s), which shall not exceed estimated cost towards such works and (ii) firm date of start of Grid Connectivity: Provided that if such a planned InSTS sub-station and terminal bay(s) are planned for more than one applicant, Grid Connectivity BG shall be furnished in proportion to the quantum of Grid Connectivity applied for by such applicant;	1st Suggestion: There should be no requirement of such BG, since the applicant is already providing commitment fee, PBGs to the REIA/Distribution Companies, or investing in land or providing BG in lieu of land in terms of clause 5.2.6 / 5.2.7		Please refer STU comments against Clause 7.9.3a above.
67				2nd Suggestion: However, if somehow the 1st Suggestion as above is not accepted, then STU should atleast consider the following corrections: b) For cases covered under Clause 7.8 of this Procedure, STU shall intimate (i) amount of Grid Connectivity BG towards a planned /proposed InSTS sub-station and terminal bay(s), which shall not exceed estimated cost towards such works, or Rs One Lakh per MW, whichever is lower and (ii) firm date of start of Grid Connectivity: Provided that if such a planned InSTS sub-station and terminal bay(s) are planned for more than one applicant, Grid Connectivity BG shall be furnished in proportion to the quantum of Grid Connectivity applied for by such applicant; Provided further that, if more applicants are granted Grid Connectivity at a later stage, and accordingly the applicable BG amount gets reduced, the excess BG of the earlier applicant shall be released within thirty (30) days of receipt of BG from the later applicant		Please refer STU comments against Clause 7.9.3a above.
68				3rd Suggestion: Even if the 2nd Suggestion as above is accepted, still the following correction should be considered: ...Grid Connectivity BG towards a planned /proposed InSTS substation..	The requirement of BG should only be applicable when there is no planned s/s, and STU proposes for a new s/s based upon the application received. When the s/s is already planned, there is no rationale for BG.	Please refer STU comments against Clause 7.9.3a above.

Sr. No.	Clause Ref.	Name of Stakeholder	Clause as per Procedure	Submission	Explanation / rationale by stakeholder	STU's Comments
69	7.9.3.c	Avaada Energy Private Limited	7.9.3 Grid Connectivity Bank Guarantee (BG): c) The amount of Grid Connectivity BG covered under Clause 7.9.3(b), shall be equal to cost of a planned/ proposed InSTS substation and terminal bay(s).	C) The amount of Grid Connectivity BG covered under Clause 7.9.3(b), shall be equal to cost of a planned/ proposed InSTS substation and terminal bay(s), subject to a maximum limit of Rs One Lakh Per MW of Connectivity Application.		Please refer STU comments against Clause 7.9.3a above.
70	7.9.3.e	Avaada Energy Private Limited	7.9.3 Grid Connectivity Bank Guarantee (BG): e) The Applicant shall furnish Grid Connectivity BG within fifteen (15) calendar days of such intimation by STU under Clause 7.9.3(a) and Clause 7.9.3.(b), failing which the grid connectivity application shall be Cancelled: Provided that a fifteen (15) calendar days' period for furnishing Grid Connectivity BG shall not be considered within the target time limit of thirty (30) days for issuance of Grid Connectivity.	e) The Applicant shall furnish Grid Connectivity BG within fifteen (15) thirty (30) calendar days of such intimation by STU under Clause 7.9.3(a) and Clause 7.9.3.(b), failing which the grid connectivity application shall be Cancelled: Provided that a fifteen (15) thirty (30) calendar days' period for furnishing Grid Connectivity BG shall not be considered within the target time limit of thirty (30) days for issuance of Grid Connectivity.		Stakeholder has not submitted any rationale for proposed modification. Hence, suggestion is not accepted.
71	7.9.4	Avaada Energy Private Limited	Additional clause	7.9.4 For cases covered under clause 7.7 and 7.8, in case there is delay in the augmentation or new infrastructure, and the application has been filed under clause 5.2.7 (a), then the SCOD of the project shall be correspondingly extended by the respective Renewable Energy Implementing Agency or a distribution licensee or an authorized agency on behalf of distribution licensee consequent to tariff based competitive bidding, as the case may be .	Similar provisions are available in case of projects granted connectivity by CTU.	Enabling provisions in Clause 7.7 and Clause 7.8 in line with existing regulatory framework approved by the Hon'ble MERC have already been incorporated in Procedure. Hence, suggestion is not acceptable.
72	7.15	Suzlon	STU shall indicate to the Grid Connectivity grantee, the voltage level for the purpose of Grid Connectivity of the Dedicated Transmission Line. Table 1: Voltage level for inter-connection and period for work completion Fresh Application Sr. No. Voltage level for Inter-connection Period for Work Completion* 1. Upto 33 kV level-12 months 2. At 66 kV/ 100kV/ 110 kV/ 132 kV level-18 months 3. At 220 kV level-24 months 4. At 400 kV level-36 months	Request to be modify the work for wind projects as below A) Fresh Application Sr. No. Voltage level for Inter-connection Period for Work Completion* 1. Upto 33 kV level-15 months 2. At 66 kV/ 100kV/ 110 kV/ 132 kV level-24 months 3. At 220 kV level-30 months 4. At 400 kV level-42 months	Normally wind projects will take more time compared to solar projects due to wind WTG's locations are scattered.	Stakeholder has not submitted any justification for proposed modification. Further, no other stakeholder has raised this concern. Based on past experience, suggestion is not accepted.
73	7.17	Tata Power	Final Grant	If evacuation system as per grid connectivity application is ready, even though generation will take time to step up to connectivity quantum, Final Grant of Connectivity to be issued. Finalising customers in GC/OA schemes takes time. Consequently registering in MEDA / STU for specific capacity will happen only after finalising customer. Hence, Final Grant of connectivity should be issued by MEDA / STU certificate based on completion of evacuation infrastructure as per drawing. In case a project is being set up for Merchant sale wherein no MOU / PPA is available, in such case based on submission of short term application for of Exchange, Final Grant to be provided.		As per existing as well as per revised grid connectivity procedure, irrespective of date of commissioning of generation, Final grid connectivity is issued based on the completion of evacuation arrangement.

Sr. No.	Clause Ref.	Name of Stakeholder	Clause as per Procedure	Submission	Explanation / rationale by stakeholder	STU's Comments
74	7.17	Avaada Energy Private Limited	7.17 After completion of all the works related to the commissioning of evacuation infrastructure and scope of works as mentioned in the Grid Connectivity Letter, the Applicant shall submit the online application for final grant of Grid Connectivity as per Format – 6 of this Procedure. After scrutinizing the documents, STU shall issue Final Grid Connectivity to the applicant. After receipt of the Final Grid Connectivity, the applicant shall seek permission for Synchronization from the concerned SLDC. The documents to be submitted for availing Final grant of Grid Connectivity are listed below: Work Completion Report as per the Scope of Works mentioned in the Grid Connectivity Letter from concerned Superintending Engineer, EHV (O&M) Circle. ABT Meters Work Completion/installation Report from concerned Superintending Engineer, PAC. SCADA/RTU-DC installation & commissioning report from concerned Superintending Engineer, PAC. Connection Agreement executed with STU and Applicant / Tripartite Agreement / Connection Agreement executed with the concerned Chief Engineer EHV CC O&M Zone, MSETCL. Site Responsibility Schedule along with equipment details executed with MSETCL. Approved Copy of Single Line Diagram and layout. Approved copy of Metering Arrangement Scheme (if applicable).	7.17 After completion of all the works related to the commissioning of evacuation infrastructure and scope of works as mentioned in the Grid Connectivity Letter, the Applicant shall submit the online application for final grant of Grid Connectivity as per Format – 6 of this Procedure. After scrutinizing the documents, STU shall issue Final Grid Connectivity to the applicant. After receipt of the Final Grid Connectivity, the applicant shall seek permission for Synchronization from the concerned SLDC. The documents to be submitted for availing Final grant of Grid Connectivity are listed below: a) Work Completion Report as per the Scope of Works mentioned in the Grid Connectivity Letter from concerned Superintending Engineer, EHV (O&M) Circle. b) ABT Meters Work Completion/installation Report from concerned Superintending Engineer, PAC. c) SCADA/RTU-DC installation & commissioning report from concerned Superintending Engineer, PAC. d) Connection Agreement executed with STU and Applicant / Tripartite Agreement / Connection Agreement executed with the concerned Chief Engineer EHV CC O&M Zone, MSETCL. e) Site Responsibility Schedule along with equipment details executed with MSETCL. f) Approved Copy of Single Line Diagram and layout, approved from _____ . g) Approved copy of Metering Arrangement Scheme (if applicable), approved from _____ . h) Approved copy of Synchronization Scheme (if applicable), approved from _____ . i) Confirmation of AMR facility integration control center at MSLDC.	Wherever, there is an activity which has to be completed by an agency other than the Applicant itself, the name/designation/office of such agency, along with timelines for such agency, should be clearly specified in these Procedures.	Suggestion is accepted and accordingly following changes incorporated in the clause. Modified Clause: "a) e) Site Responsibility Schedule along with equipment details executed with MSETCL. f) Approved Copy of Single Line Diagram and layout, from concerned Chief Engineer, EHV PC O&M Zone, MSETCL . g) Approved copy of Metering Arrangement Scheme (if applicable), from Chief Engineer (AC&I), MSETCL . h) Approved copy of Synchronization Scheme (if applicable), from Chief Engineer (AC&I), MSETCL and Chief Engineer (MSLDC) ."
75	7.19	Suzlon	Add new clause	Request to add new point - 7.19 as, RE applicants shall be allowed to participate in STU Meetings	RE applicants shall be allowed to participate in Maharashtra Transmission Committee, Grid coordination Committee (quarterly) so that RE potential sites can be identified as per wind studies and discussed in such meeting	Grid Coordination Committee (GCC) already have following representation specific to Renewable energy: 1) Representative of Maharashtra Energy Development Agency in the capacity of Member of the core group 2) RE generator representative as a member of grid-coordination conference Participation of specific RE applicant(s) in GCC/MTC is outside scope of this Procedure. Hence, suggestion is not accepted.
76	8.1	Tata Power		The clause indicates various applicable regulations which refer to both SERC & CEA / CERC regulations. In case of difference between SERC & CEA/ CERC requirements, which clause in the regulation has precedence		No clarification required. Stakeholder need to comply relevant/applicable regulations.
77	8.3.1	Suzlon	Pooling station of the renewable energy generating stations: c) The total capacity of the power transformers of the generator pooling station and the rating of associated equipment like Circuit Breaker, Current Transformer, Capacitive Voltage Transformer, bus duct, etc. shall not be less than the planned capacity of the generator pooling station in case the entire power from the renewable energy generating station is being aggregated at the lower voltage side of the generator pooling station.	RE developers shall be allow to install more than the connectivity grant subject to restrict to injection as per the capacity of connectivity granted	In general normally wind plant will have long 33 kV lines due to the scattered locations of WTG's. Hence it is essential for developer to install more capacity than connectivity granted to mitigate the losses due to lengthy EHV transmission line & 33 kV Lines	The grant of connectivity shall be based on based on the Installed capacity subject to following additional clause. Accordingly, Suggestion is partially accepted: "An Applicant, which are Renewable Energy Generating Stations shall apply for grant of Connectivity to the InSTS for the quantum equal to the installed capacity of the generating station: Provided that if such an applicant is a Hybrid Renewable Energy Project or Hybrid Renewable Energy Project with storage, it may apply for grant of Connectivity at least for the installed capacity of the wind or solar capacity, whichever is higher or upto the total installed capacity."

Sr. No.	Clause Ref.	Name of Stakeholder	Clause as per Procedure	Submission	Explanation / rationale by stakeholder	STU's Comments
78	8.3.1	Avaada Energy Private Limited	8.3.1. Dedicated Transmission Line (DTL): The power transfer capability (MW) of the Dedicated Transmission Line from the generator pooling station of the renewable energy generating station to the InSTS shall not be less than the quantum as per this Procedure or as stipulated by STU in the intimation for grant of Grid Connectivity.	8.3.1. Dedicated Transmission Line (DTL): a) The power transfer capability (MW) of the Dedicated Transmission Line from the generator pooling station of the renewable energy generating station to the InSTS shall not be less than the quantum as per this Procedure of power to be interchanged with the InSTS, or as stipulated by STU in the intimation for grant of Grid Connectivity		Stakeholder has not submitted any rationale for proposed modification. The Clause is in line with the CERC Regulations and with the approved RE Grid connectivity Procedure for Gujarat. Hence, suggestion is not accepted.
79	8.3.2	Avaada Energy Private Limited	8.3.2 Pooling station of the renewable energy generating stations: a) The planned capacity of the generator pooling station shall be not less than the capacity of the Dedicated Transmission Line required to be provided as per the grant of Grid Connectivity.	8.3.2 Pooling station of the renewable energy generating stations: The planned capacity of the generator pooling station shall be not less than the capacity of the Dedicated Transmission Line required to be provided quantum of power to be interchanged with the InSTS as per the grant of Grid Connectivity.		Stakeholder has not submitted any rationale for proposed modification. The Clause is in line with the CERC Regulations and with the approved RE Grid connectivity Procedure for Gujarat. Hence, suggestion is not accepted.
80	8.3.2	Tata Power	b) The Dedicated Transmission Line shall be terminated at the high-voltage side of the generator pooling station. The bus switching scheme should be in line with the requirement specified in the CEA Manual on Transmission Planning Criteria, 2023 as amended from time to time.	This clause is referring CEA transmission planning criteria-2023 for bus switching scheme, etc. As per this in clause 4.4.5 for RE project with storage should have to comply N-1 redundancy in TL/PTR. Then in such cases we have to build redundancy or not ?		No clarification required. (Stakeholder need to comply relevant/applicable regulations.)
81	9.4	JSW	An applicant which is Renewable Energy Power Projects (other than Hydro generating station) or ESS (excluding PSP) covered under clause 5.2.7(c) or Solar/Wind Park Developer covered under clause 5.2.7(c) of this Procedure shall have to achieve the financial closure for the capacity of such Grid Connectivity, within six (6) months from the date of issue of Grid Connectivity Letter: Provided that such an applicant shall submit proof of financial closure of the project (with a copy of the loan sanction letter or proof of first disbursement of the loan amount) or a copy of board resolution (if internal funding is planned for 100% of the project cost) to STU within fifteen (15) days of achieving the financial closure.	An applicant which is Renewable Energy Power Projects (other than Hydro generating station) or ESS (excluding PSP) covered under clause 5.2.7(c) or Solar/Wind Park Developer covered under clause 5.2.7(c) of this Procedure shall have to achieve the financial closure for the capacity of such Grid Connectivity, within fifteen (15) months from the date of issue of Grid Connectivity Letter: Provided that such an applicant shall submit proof of financial closure of the project (with a copy of the loan sanction letter or proof of first disbursement of the loan amount) or a copy of board resolution (if internal funding is planned for 100% of the project cost) to STU within thirty (30) days of achieving the financial closure.		Suggestion is partially accepted and accordingly, the clause is modified as under: Modified clause: "9.4 An applicant which is Renewable Energy Power Projects (other than Hydro generating station) or ESS (excluding PSP) covered under clause 5.2.7(c) or Solar/Wind/ Renewable Power Park Developer covered under clause 5.2.7(c) of this Procedure shall have to achieve the financial closure for the capacity of such Grid Connectivity, within twelve (12) months six (6) months from the date of issue of Grid Connectivity Letter: Provided that in case of an applicant whose voltage level for interconnection is upto 33 kV level shall have to achieve the financial closure for the capacity of such Grid Connectivity, within six (6) months from the date of issue of Grid Connectivity Letter: <i>Provided further that such an applicant shall submit proof of financial closure of the project (with a copy of the loan sanction letter or proof of first disbursement of the loan amount) or a copy of board resolution (if internal funding is planned for 100% of the project cost) to STU within fifteen (15) days of achieving the financial closure."</i>
82	9.4	Avaada Energy Private Limited	Progress Review 9.4 An applicant which is Renewable Energy Power Projects (other than Hydro generating station) or ESS (excluding PSP) covered under clause 5.2.7(c) or Solar/Wind Park Developer covered under clause 5.2.7(c) of this Procedure shall have to achieve the financial closure for the capacity of such Grid Connectivity, within six (6) months from the date of issue of Grid Connectivity Letter:	Progress Review 9.4 An applicant which is Renewable Energy Power Projects (other than Hydro generating station) or ESS (excluding PSP) covered under clause 5.2.7(c) or Solar/Wind Park Developer covered under clause 5.2.7(c) of this Procedure shall have to achieve the financial closure for the capacity of such Grid Connectivity, within six (6) months from the date of issue of Grid Connectivity Letter: before the Period of Work Completion as provided under clause 7, or the extended time limits as per clause 10, whichever is later.		Please refer STU comments against Clause 9.4 above along with modified Clause.

Sr. No.	Clause Ref.	Name of Stakeholder	Clause as per Procedure	Submission	Explanation / rationale by stakeholder	STU's Comments
83	9.4	Avaada Energy Private Limited	Pl. refer clause above	An applicant which is Renewable Energy Power Projects (other than Hydro generating station) or ESS (excluding PSP) covered under clause 5.2.7(c) or Solar/Wind Park Developer covered under clause 5.2.7(e) 5.2.6(c) of this Procedure shall have to achieve the financial closure for the capacity of such Grid Connectivity, within six (6) months from the date of issue of Grid Connectivity Letter:		Please refer STU comments against Clause 9.4 above along with modified Clause.
84	9.4	Reliance	An applicant..... the Solar/Wind Park Developer covered under clause 5.2.7 c..... Connectivity letter	The clause should read An applicant..... the Solar/Wind Park Developer covered under clause 5.2.6 c..... Connectivity letter		Please refer STU comments against Clause 9.4 above along with modified Clause.
85	9.5	JSW	An applicant which is Renewable Energy Power Projects (other than Hydro generating station) or ESS (excluding PSP) covered under clause 5.2.6(c) or Solar/Wind Park Developer covered under clause 5.2.7(c) of this Procedure shall submit documents for land in terms of clause 5.2.7(b) or clause 5.2.6(b) of this Procedure, as the case may be, within twelve (12) months from the date of issue of Grid Connectivity Letter.	An applicant which is Renewable Energy Power Projects (other than Hydro generating station) or ESS (excluding PSP) covered under clause 5.2.6(c) or Solar/Wind Park Developer covered under clause 5.2.7(c) of this Procedure shall submit documents for 50% of land in terms of clause 5.2.7(b) or clause 5.2.6(b) of this Procedure, as the case may be, within eighteen (18) months from the date of issue of Grid Connectivity Letter.		Suggestion is not accepted , however, the clause is modified as under: Modified Clause: <i>"9.5 An applicant which is Renewable Energy Power Projects (other than Hydro generating station) or ESS (excluding PSP) covered under clause 5.2.6(c) or Solar/Wind/ Renewable Power Park Developer covered under clause 5.2.7(c) of this Procedure shall submit documents for land in terms of clause 5.2.7(b) or clause 5.2.6(b) of this Procedure, as the case may be, within twelve (12) months from the date of issue of Grid Connectivity Letter. The Bank Guarantee shall be returned within seven (7) days of submission of stipulated documents as a proof of Ownership or lease rights or land use rights: Provided that in case of an applicant whose voltage level for interconnection is upto 33 kV level shall submit documents for land in terms of clause 5.2.7(b) or clause 5.2.6(b) of this Procedure, as the case may be, within six (6) months from the date of issue of Grid Connectivity Letter."</i>
86	9.5	Juniper Green Energy	An applicant which is Renewable Energy Power Projects (other than Hydro generating station) or ESS (excluding PSP) covered under clause 5.2.6(c) or Solar/Wind Park Developer covered under clause 5.2.7(c) of this Procedure shall submit documents for land in terms of clause 5.2.7(b) or clause 5.2.6(b) of this Procedure, as the case may be, within twelve (12) months from the date of issue of Grid Connectivity Letter. The Bank Guarantee shall be returned within seven (7) days of submission of stipulated documents as a proof of Ownership or lease rights or land use rights.	An applicant which is Renewable Energy Power Projects (other than Hydro generating station) or ESS (excluding PSP) covered under clause 5.2.7(c) or Solar/Wind Park Developer covered under clause 5.2.6(c) of this Procedure shall submit documents for land in terms of clause 5.2.7(b) or clause 5.2.6(b) of this Procedure, as the case may be, within twelve (12) months from the date of issue of Grid Connectivity Letter. The Bank Guarantee shall be returned within seven (7) days of submission of stipulated documents as a proof of Ownership or lease rights or land use rights.		Please refer STU comments against Clause 9.5 above along with modified Clause.
87	9.5	Reliance	An applicant which is Renewable Energy Power Project...covered under 5.2.6.c or Solar/Wind Park developer covered under clause 5.2.7. c..... land use right	The clause should read: An applicant which is Renewable Energy Power Project...covered under 5.2.7.c or Solar/Wind Park developer covered under clause 5.2.6.c..... land use right		Please refer STU comments against Clause 9.5 above along with modified Clause.

Sr. No.	Clause Ref.	Name of Stakeholder	Clause as per Procedure	Submission	Explanation / rationale by stakeholder	STU's Comments
88	9.6	Juniper Green Energy	In case of all renewable energy projects who have been granted grid connectivity to InSTS prior to date of approval of this Procedure and the same are yet to be granted Final Grid Connectivity, shall be reviewed as per Clause No. 9.4 & 9.5 after Six Months after date of approval of this procedure.	In case of all renewable energy projects who have been granted grid connectivity to InSTS prior to date of approval of this Procedure and the same are yet to be granted Final Grid Connectivity, shall be reviewed as per Clause No. 9.4 & 9.5 after Six Months after date of approval of this procedure.	<p>1. We understand that this provision is applicable only for the RE Projects connectivity approvals (i.e. not applicable for RE Park Developer mode), kindly confirm.</p> <p>2. Given that clause no. 9.5 deals with the provisions for submission of 50% land documents within 12 months from grant of connectivity for land BG based application. Since there was no land BG based applications in the earlier process and land lease documents were not required to be submitted, we request that this provision should NOT be applicable for the old connectivity approvals.</p> <p>3. In case this provision is made applicable to the RPPD then such RPPD should be allowed to comply with the requirement prescribed under clause no. 9.4 by the investor with whom the connectivity sharing right agreement has been signed.</p>	<p>Suggestion is partially accepted. The modified clause is provided below: Modified Clause: <i>"9.6 In case of all renewable energy projects who have been granted grid connectivity to InSTS prior to date of approval of this Procedure and the same are yet to be granted Final Grid Connectivity and who are yet to complete six (6) months from the date of issue of Grid Connectivity Letter upto the date of coming into effect of this Procedure, shall be reviewed as per revised timelines applicable starting from the date of coming into effect of this Procedure i.e., as per timelines stipulated Clause No. 9.4 & 9.5 of this Procedure after Six Months after date of approval of this procedure : Provided further that in case of all renewable energy projects who have been granted grid connectivity to InSTS prior to date of approval of this Procedure and the same are yet to be granted Final Grid Connectivity and who have completed six (6) months from the date of issue of Grid Connectivity Letter upto the date of coming into effect of this Procedure, shall be reviewed as per revised timelines of six-month grace period applicable starting from the date of coming into effect of this Procedure for fulfilment of milestone stipulated in the Clause No. 9.4 & 9.5 of this Procedure."</i></p>
89	10.2	Aditya Birla Renewables	Only two three time extensions of six (6) months each...	These projects require huge investment and further there are many challenges in executing the project such Right of Way for transmission line and others and hence Incase substantial progress in construction of PSS and transmission line has been done than three extension of six (6) months each may be given		<p>The present practice adopted in the state is evolved based on experiences and state specific issues. Further, the practice cannot be different for processing of Grid Connectivity application for conventional generators and RE i.e. non-conventional generators</p> <p>Hence, suggestion is not accepted.</p>
90	10.3	Avaada Energy Private Limited	10.3 MSEDCL, MSPGCL and MEDA are required to take various permissions from the government and it may require time, therefore, time extension fees shall not be applicable for such companies.	10.3 MSEDCL, MSPGCL and MEDA are required to take various permissions from the government and it may require time, therefore, time extension fees shall not be applicable for such companies.		<p>This Procedure has been aligned with GoM RE Policy. It is to note that changes in GoM RE Policy are not envisaged through this Procedure.</p> <p>Hence, suggestion is not accepted.</p>
91	11.1	Avaada Energy Private Limited	Treatment of Grid Connectivity Bank Guarantee (BG) 11.1 Grid Connectivity Bank Guarantee shall be returned in five equal parts over five years corresponding to the generation capacity which has been declared under commercial operation by the Grid Connectivity grantee: Provided that in case of declaration of commercial operation of part capacity by the Grid Connectivity grantee in a financial year, total quantum of such capacity declared under commercial operation within a financial year shall be considered while returning the Grid Connectivity Bank Guarantee at the end of the financial year.	Treatment of Grid Connectivity Bank Guarantee (BG) 11.1 Grid Connectivity Bank Guarantee shall be returned in five equal parts over five years after the commercial operation of the project , corresponding to the generation capacity which has been declared under commercial operation by the Grid Connectivity grantee: Provided that in case of declaration of commercial operation of part capacity by the Grid Connectivity grantee in a financial year, total quantum of such capacity declared under commercial operation within a financial year shall be considered while returning the Grid Connectivity Bank Guarantee at the end of the financial year.	Once the COD has been achieved, there is no rationale behind holding the BG for five years.	<p>The provision is incorporated to ensure capacity properly being taken into service. Also, the clause is in line with CERC Regulations.</p> <p>Hence, suggestion is not accepted.</p>