NATIONAL SOLAR ENERGY FEDERATION OF INDIA
Regd. No. 362 / IV of 8 May, 2013

Ref.: NSEFI/SECI/01/2020
Date: 21st February 2020

To

Shri Jatindra Nath Swain, *IAS*
Chairman & Managing Director
Solar Energy Corporation of India Limited
(A Govt. of India Enterprise)
1st Floor, D-3, A Wing, Prius Platinum Building District Centre,
Saket, New Delhi – 110017

Subject: RfS for Selection of RE Power Developer for "Round-the-Clock" supply of 400 MW RE Power to NDMC, New Delhi, and Dadra & Nagar Haveli (RTC-I) – Regarding request for amendment in RfS/PPA documents mandating *generation and ESS, should be co-located, instead of allowing to be located at different locations*

Ref.:
1. SECI RfS No. ECI/C&P/RPD/RTC-I/RfS/400MW /102019 dated: 18.10.2019
2. First Amendment to the RfS/PPA: *No. SECI/C&P/RPD/RTC I/102019/Amendment-01 dated 29.01.2020*

Dear Sir,

With reference to the subject matter, NSEFI submits that the Ministry of New & Renewable Energy (MNRE) has vide notification No. 238/78/2017-Wind dated 14th May, 2018 issued "National Wind-Solar Hybrid Policy" with objective to provide a framework for promotion of large grid connected wind solar PV hybrid system for optimal and efficient utilization of transmission infrastructure and land, reducing the variability in renewable power generation and achieving better grid stability. The relevant portion of the said hybrid policy dated 14th May, 2018 is reproduced as under:

> ***"2. AIMS AND OBJECTIVE***
> *2.1 The main objective of the Policy is to provide a framework for promotion of large grid connected wind-solar PV hybrid system for optimal and efficient utilization of transmission infrastructure and land, reducing the variability in renewable power generation and achieving better grid stability."*
> ***"4. WIND-SOLAR HYBRID SYSTEMS***
> *4.1 Under the category of wind-solar hybrid power plants, Wind Turbine Generators (WTGs) and Solar PV systems will be configured to operate at the same point of grid connection. There can be different approaches towards integrating wind and solar*

depending upon the size of each of the source integrated and the technology type."

……..

***"4.3 The second important aspect would be related to the sizing** – which would depend on the resource characteristics. In order to achieve the benefits of hybrid plant in terms of optimal and efficient utilization of transmission infrastructure and better grid stability by reducing the variability in renewable power generation, in the locations where the wind power density is quite good, the size of the solar PVs capacity to be added as the solar-hybrid component could be relatively smaller. On the other hand, in case of the sites where the wind power density is relatively lower or moderate, the component of the solar PV capacity could be relatively on a higher side. However, a wind-solar plant will be recognized as hybrid plant if the rated power capacity of one resource is at least 25% of the rated power capacity of other resource. ……."*

From the above, it clearly appears that the aim and objective of the "National Wind-Solar Hybrid Policy" is for promotion of large grid connected and co-located wind-solar PV hybrid system for optimal and efficient utilization of transmission infrastructure.

Under the National Wind-Solar Hybrid Policy, SECI has brought out RfS for Selection of RE Power Developer for "Round-the-Clock" supply of 400 MW RE Power (RTC-I), referred at Ref. No.1. Subsequently, SECI also brought out an amendment to the said RfS / PPA documents (referred at Ref. No.2), wherein, *inter alia*, following clauses were amended:

Amended Clauses

Section I, Cl. 1.38

"….. It may be noted that the sources of generation and ESS, if any, may be co-located, or may be located at different locations, to be considered a single Project;"

Section III, Cl. 4.0

"The Project can be located anywhere in India. The RE generation components, along with ESS installed, if any, may either be co-located, or may be located at different locations. In case of co-location of Project components, hybridization of power, if any, shall be done prior to or at the Delivery Point."

Amendments in the PPA document

Amended Clause

"1.1 "Power Project" or "Project"

….. It may be noted that the sources of generation and ESS, if any, may be colocated, or may be located at different locations, to be considered a single Project;"

(Emphasis added)

NSEFI is of the view that in the above referred amendment in the bid, allowing sources of generation and ESS, to be located at different locations, is against the aims objective of the National Wind-Solar Hybrid Policy.

NSEFI is firmly believe that allowing RE generation and ESS at different location would result into inefficient and sub-optimal utilization of transmission infrastructure.

NSEFI further submits by allowing injection of wind generation, solar generation and storage at different location, there will be a need to create transmission infrastructure at all these locations. It means that for a same end product, we are duplicating the transmission infrastructure and also sub-optimal utilizing of such Transmission asset. Though there is ISTS transmission Charges and losses waiver till December, 2022, but there would also be unnecessary additional investment in power evacuation.

It may be appreciated that while forming the National Wind-Solar Hybrid Policy and subsequently the draft bidding guidelines, for optimal utilization of transmission asset, wind/ solar and storage assets to be located considered at same location. Considering the same, the NSEFI request to reinstate the original provisions of RfS and PPA and issue an amendment accordingly.

21/02/2020

National Solar Energy Federation of India
New Delhi
110019

Subrahmanyam Pulipaka
Chief Executive Officer
National Solar Energy federation of India

Copy to :

1. **Secretary, Ministry of New and Renewables**
2. **Secretary, Central Electricity Regulatory Commission**
3. **Dr. Subir Sen, Chief Operating Officer, Central Transmission Utility**
4. **Shri S. K. Mishra, Director (PS), Solar Energy Corporation of India Limited**
5. **Shri C. Kannan, Director (Finance), Solar Energy Corporation of India Limited**