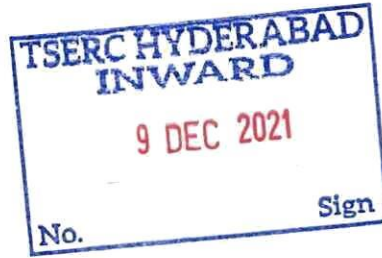


# Argo Solar Private Limited

#102, Sai Balaji Towers, Plot No: 109,  
Patrika Nagar, Hitech City,  
Madhapur, Hyderabad - 500 081  
Telangana, INDIA  
Ph: +91 40 3290 2344



ASPL/TSERC/21-22/001

Date: 07 Dec 2021

To,  
The Commission Secretary,  
Telangana State Electricity Regulatory Commission,  
5<sup>th</sup> Floor, Singareni Bhavan,  
Red Hills, Lakdi-ka-pul,  
Hyderabad 500 004  
Email: [secy@tserc.gov.in](mailto:secy@tserc.gov.in)

Ref: Your public notice in the matter of approval of Model Connection Agreement, dated 17/11/21

Dear Sir,

In the subject matter referenced above, we Argo Solar Private Limited, a leading EPC company in the distributed solar solutions sector, would hereby submit our suggestions/ comments/ objections for the kind consideration of Hon'ble commission from the perspective of bulk consumers, vide Annexure attached herewith.

Submitted your perusal please.

Thanking you, Sir,

Yours sincerely,  
For Argo Solar Private Limited

Rajesh Peddu  
Director



## ANNEXURE

### Suggestions/ Objections/ Comments against Model Connection Agreement

Sl	Reference from Model Connection Agreement/ Grid Code/ Electricity Act 2003 and relevant statutory guidelines	Suggestions/ Objections/ Comments
1)	<p><u>Telangana State Electricity Grid Code, 2018:</u>  <u>Clause 13.1:</u> Provided that the standard format of application mentioned in the Clause 13.1 shall be prepared by STU shall be made available on its website within two (2) months of notification of this regulation</p> <p><u>Proposed Connection Agreement:</u>  <u>Page 2: Applicability:</u>                      In case of bulk consumers who intend to utilize the entire captive generation and not supply power to the grid, those consumers can enter the agreement applicable to bulk consumers.</p>	<p>Is there an application format notified by concerned authority for bulk consumers who intend to set up captive generating plants without option to sell surplus power to grid? Current TSTRANSCO website provides application formats only for Open Access Consumers or Generators, and the format for bulk consumers willing to set up captive power generation stations is not available.</p> <p>Request Hon'ble Commission to kindly clarify the procedure to be followed by such bulk consumers willing to set up captive plants with details of the application format, authority to be approached, timelines for signature by respective authorities, designated signatories to connectivity agreement on behalf of TRANSCO/DISCOM, and metering infrastructure to be adopted.</p> <p>Also kindly clarify the captive generation capacity limits for bulk consumers who intend to set up captive power plants with or without option to sell surplus power to grid.</p>
2)	<p><u>Electricity Act 2003:</u>  <u>Section 9 (1):</u>                      Notwithstanding anything contained in this Act, a person may construct, maintain or operate a captive generating plant and dedicated transmission lines.</p> <p>Provided further that no licence shall be required under this Act for supply of electricity generated from a captive generating plant to any licensee...</p> <p><u>Proposed Connection Agreement:</u>  <u>Page 3: Applicability:</u>                      2) For new generator connection, the connection agreement is to be concluded before synchronization of the Generator.</p>	<p>With reference to provisions given in Electricity Act 9 (1) towards the rights of bulk consumers to install and operate captive generating plants, kindly elaborate the role/responsibility of TRANSCO/ DISCOM in the process of a bulk consumer's setting up a captive generating plant with or without option to sell excess power to Grid.</p> <p>Should the bulk consumer take any feasibility approval from TRANSCO/DISCOM prior to planning the setting up of captive generating plant? If so please list out the timelines for approval and any grounds for refusal of permission or deemed permission in case of delay in response from TRANSCO/ DISCOM.</p> <p>Currently there is no clarity on when the bulk consumer should approach TRANSCO/ DISCOM with the intention to sign the Connection Agreement.</p> <p>Hence, kindly clarify the total process flow till the signing of the proposed connection agreement for bulk consumers who intend to set up new captive generating stations.</p>
3)	<p><u>Proposed Connection Agreement:</u>  <u>Clause 2.15: SCADA and Communication Facilities</u> (Page 33)                      ..... agrees to maintain reliable and efficient speech and data communication systems to facilitate necessary communication and data exchange as prescribed by the SLDC...</p>	<p>1) Is SCADA or any such Data Communication System (DCS) required to be provided by all bulk consumers, with or without existing captive generating plants? If yes, kindly specify the timeline for existing bulk consumer with or without captive generating systems to install such SCADA/ DCS from the date of signing connection agreement.</p> <p>2) If no, then kindly specify whether bulk consumers, intending to set up new captive generating plants without sale of surplus power to DISCOMs, should</p>



SI	Reference from Model Connection Agreement/ Grid Code/ Electricity Act 2003 and relevant statutory guidelines	Suggestions/ Objections/ Comments
		<p>install SCADA/ DCS, and if there is any threshold MW capacity limited beyond which it is mandatory.</p> <p>3) Since SCADA/ DCS systems are costly to procure, install and maintain, we request the Hon'ble Commission to kindly exempt bulk consumers with captive generating stations having less than 5 MW capacity from the requirement of SCADA/ DCS connectivity with SLDC.</p>
4)	<p><u>Electricity Act 2003:</u> <u>Section 9 (1):</u> Notwithstanding anything contained in this Act, a person may construct, maintain or operate a captive generating plant and dedicated transmission lines.</p>	<p>The Solar Rooftop Net Metering guidelines notified by Hon'ble Commission provide option for sale of surplus power to Grid under Net Metering mechanism, only for Solar Rooftop Plants.</p> <p>However, if a LT or 11 kV consumer intends to set up Captive Power Plant based on Solar or Wind or other RE sources or any fossil fuel sources, and with or without option to sell power to grid, then there is no clarity on the regulatory framework, capacity limits, approval process and connectivity requirements for setting up such captive generating plants.</p> <p>Hence, in view of Section 9(1) of Electricity Act, 2003, giving rights to consumers to set up captive generating plants, we request the Hon'ble Commission to clarify the procedure, process flow and connection agreements to be entered by Consumers who are connected to DISCOMs at voltage levels below 33 kV, to set up captive generating plants without option to sell surplus power to Grid.</p>