



Cyber Village Solutions Private Limited

Ref No. CVS/2019-20/001

Date: 7th March 2020

Subject: Comments/suggestions on "APERC amendment (Terms & conditions of open access) draft Regulation No.2 of 2005"

We are writing on behalf of M/S Cyber Village Solutions Pvt. Ltd. 2 Mw Third Party Solar power plant in Andhra Pradesh. As the honourable Commission has proposed an amendment to the regulation no 2 of 2005 with respect to G.O Ms. No.35 dated 18th November 2019.

We understand the proposed draft regulation shall be applicable only for the projects commissioned under Solar policy 2018 and its amendment wind policy 2019. The commission may amend the regulation w.r.t Solar policies 2018 & its amendment in 2019.

We would like to submit below our views & suggestions to the hon'ble commission.

The draft regulation published in the web site speaks only about the wind power projects commissioned under the Solar power policy G.O.Ms.No.2 dated 03-01-2019. The government has also mentioned in the Solar policy 2018 that the GO Ms no 2 is super seeding the Solar policy 2015.

There are several Solar projects who have commissioned the projects in the operative period of 2015 Solar policy by seeking the necessary approvals from NREDCAP & APTRANSCO.

Many IPP's have come forward and setup their Solar power plants in AP by looking at the incentives given by the state government through its Solar policy in 2015. And as per the policy these incentives shall be given for a period of 10 years from the date of commissioning of the project.

Therefore, the regulation shall be amended w.r.t the projects commissioned on or after 18-11-2019. The proposed amendment para 17.1 of principal regulation shall be made applicable only for the projects commissioned on or after 18-11-2019.

This proposed amendment by APERC speaks about the incentives such as exemption of wheeling & Transmission charges to Solar power projects.

Withdrawal of all applicable incentives for the plants commissioned prior to the date of issue of GO may not meet natural justice.

And regarding the proposed charges on RE plants commissioned on or after 18-11-2019 we would suggest the hon'ble commission to review the charges levied on Re transactions in AP. The wheeling & Transmission charges are very high when compared to a conventional generator. It is 4 times higher charges paid by a RE developer in terms of wheeling & Transmission charges.

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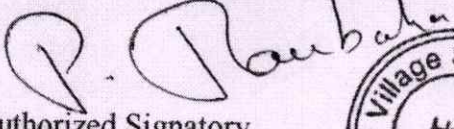
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The PLF of the plants is 25% on average for wind & solar developers and the commission has to consider the wheeling & Transmission charges per unit basis or as per the actual energy flown in to the grid but not on the total installed capacity.

Hence we request the Hon'ble Commission to review on the subject before releasing any amendment to the Hon'ble Commission's open access regulation 2 of 2005.

We also request Hon'ble Commission to consider above cited facts, and issue an amendment (If necessary) to open access regulation 2 of 2005 addressing the Solar power projects which were commissioned before the prior to GOMs. No. 35 dated 18-11-2019.

For Cyber Village Solutions Pvt. Ltd.


Authorized Signatory

