

Comments and Suggestions on Procedure for Grant of Green Energy Open Access

By Prayas (Energy Group)

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In compliance with Ministry of Power's Electricity (Promoting Renewable Energy Through Green Energy Open Access) Rules, 2022, POSOCO has issued draft Procedure for Grant of Green Open Access.

The brief document provides details of the registration and processing for green open access and also details the roles and responsibilities of various entities. However, there is lack of clarity on many aspects. Prayas (Energy Groups)'s comments and suggestions in the matter and in this context and are detailed below:

1 Applicability of procedure on Distribution Open Access

Para 1.3 of the document specifies that the procedures are for applications for inter-state and intra-state transmission green open access.

With eligible consumers being at more than 100 kW for open access and considering that there no contract demand restrictions for captive, the ambit of the rules should ideally extend to many consumers who would need to avail distribution open access to benefit from green open access provisions. However, as the centralised nodal agency would only be hosting applications for transmission open access, the procedure for distribution open access applications would remain non-transparent and with low accountability for a vast majority of open access consumers.

In order to ease implementation process, it is suggested that the applicability of the procedure be changed to include distribution open access consumers. As they are eligible consumers under the rules, distribution open access consumers should also be allowed to register on the central portal, apply for open access on the portal and the timelines for processing applications should be relevant for these consumers.

2 Clarity on designated nodal agencies

Para 2.1 b) states specifies the nodal agencies which shall be operational "till such time" that nodal agencies are designated by the Appropriate Commission. As most states have identified nodal agencies for inter-state and intra-state transmission open access in their existing regulations, it is not clear if the specification as the existing state regulations would apply rather than those stipulated in 2.1 b).

3 Clarity on technical eligibility for captive consumers

Para 4.3 reiterates provisions of the Rules that there are no load limitations for captive consumers. However, it should be clarified that metering, connectivity and safety considerations for captive will be the same as that of open access consumers with contracted demand greater than 100 kW. This is to ensure that reliability, grid safety and crucial technical considerations are not compromised in order to grant open access.

4 Furnishing information by Nodal Agencies

Para 5.1 stipulates that all information pertaining to grant of open access are to be furnished to the CNA as per timelines. To ensure clarity and accountability, it is suggested that the information to be submitted as well as timelines for submission are detailed in Annexure to the procedure. This will ensure timely and uniform compliance by all nodal agencies across the country.

5 Periodic reporting

Para 5.2 states that the Green Open Access portal shall provide periodic reports of green open access related information submitted by nodal agencies. It is suggested that such reporting include daily, weekly, monthly and annual reports on:

5.1 Application processing statistics

- Number of applications submitted
- Average time taken to process applications by nodal agency
- Number of instances of delay for various processes vis a vis the stipulated time
- Number of instances where open access was denied by nodal agency along with number of appeals

5.2 Open access information

- Source wise (wind, solar etc.), state-wise, duration-wise, MW requisitioned by open access, captive consumers at inter-state and intra-state level
- Number of open access consumers with contract demand >1 MW, < 1 MW but >500 kW and > 100 kW but less than 0.5 MW.
- Number of captive consumers with contract demand >1 MW, < 1 MW but >500 kW, > 100 kW but less than 0.5 MW as well as <100 kW
- Number of inter-state and intra-state open access and captive consumers by duration (short-term, long-term and medium term), type (trader, consumer etc.) for each state.

6 Need for additional information in the formats

To reduce ambiguity in information provided, it is suggested that more clarity is provided as to what information is expected to be submitted in the forms. Some such instances are highlighted below:

6.1 Format A

- **Applicant type-** Should include whether the consumer is open access or captive. Right now it only asks if the consumer is open access. This is important as eligibility limits are not the same.
- **Eligibility-** From Point 1, 2, 12, it is unclear if those consumers which are not procuring from an RE generator already can apply. For example, if a consumer requires open access only to participate in G-DAM/G-TAM markets, the application could be deemed incomplete and rejected. Specific provisions for such cases should be present.
- **State:** State is required twice in the format (Point 7 and 13) but it is unclear if one refers to the consumer location and another to the generator or the applicants location.

6.2 Format B1

- **Application details:** Point 3 asks if the application is on behalf of another entity. Some examples of what should be filled in should be provided. This could include Name of entity, type of entity etc.

- **Details of entity:** Name of entity is requested in Point 5. If each entity requires to be registered, then the registration number should also be noted.

6.3 Format B2

- **Distribution licensee details:** Point 6 asks for Name of Distribution licensee as well as other sources. It is not clear if this refers to Distribution licensee from whom the applicant is availing standby services or the DISCOM with whom the applicant has contracted demand or the DISCOM with whom the licensee is obtaining supply services. This should be clarified. It would also be useful to detail what other sources could mean. It is not clear if these include behind the meter sources, grid interactive onsite renewables, diesel gen sets, standby contracts etc.
- **Other agencies:** Point 11 requests “Name and Details of other agencies involved, if any”. It is not clear what the applicant is expected to report here.

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