

**CENTRAL ELECTRICITY REGULATORY COMMISSION  
NEW DELHI**

**Petition No.233/MP/2025**

Subject : Petition under Sections 63, 79(1)(b) and 79(1)(f) of the Electricity Act, 2003 read with Article 12 of the Power Purchase Agreement dated 29.1.2019 entered between Sitac Kabini Renewables Private Limited and the Solar Energy Corporation of India Limited seeking compensation for Change in Law events.

Petitioner : Sitac Kabini Renewables Private Limited (SKRPL)

Respondents : Solar Energy Corporation of India Limited and Ors.

Date of Hearing : **25.3.2025**

Coram : Shri Jishnu Barua, Chairperson  
Shri Ramesh Babu V., Member  
Shri Harish Dudani, Member  
Shri Ravinder Singh Dhillon, Member

Parties Present : Shri Sitesh Mukherjee, Sr. Advocate, SKRPL

**Record of Proceedings**

Learned senior counsel for the Petitioner submitted that the present Petition has been filed seeking reliefs in respect of Change in Law events viz. (i) Change in Land Policy by Govt. of Gujarat, (ii) mandate to install Reactive Power Compensation System in terms of Working Group Report, 2022, and (iii) payment of one-time GNA Charges as per GNA Regulations, 2022, which have led to the additional expenditure required to be incurred by the Petitioner.

2. After considering the submissions made by the learned senior counsel for the Petitioner, the Commission ordered as under:

- (a) Admit and issue notice, subject to just exceptions.
- (b) The Petitioner to implead CTUIL and GRID India- WRLDC as parties to the Petition to file a revised memo of parties within a week.
- (c) The Respondents, including impleaded Respondents, to file their respective replies, if any, within six weeks with a copy to the Petitioner, who may file its rejoinder within six weeks thereafter.
- (d) The Petitioner to file the following information /clarification, on an affidavit, within four weeks:
  - (i) A Copy of English translation of GoG Circular dated 25.7.2018.

(ii) The Petitioner has submitted that the Revenue Department, Govt. of Gujarat, vide circular dated 25.07.2018. directed holding the applications for the grant of land for WPP that have not been approved by GUVNL. It is noted that the bid cut-off date for RfS was 29.08.2018 (the last date for bid submissions). Accordingly, clarify whether the impact of the same was factored in the bid.

(iii) Information as per the table below with the relevant supporting documents:

RE Plant Particulars					
Project Details	Project Name:				
	Capacity (in MW):				
	Bid Cut-Off Date:				
	SCOD:				
	COD (date-wise capacity declared COD):				
	Technology (Solar/ Wind/ Hybrid):				
	Project Location:				
	Nearest IMD Station:	Name:	Distance from project (KMs):		
Design Parameters					
Particulars		Considered while bidding	Corresponding CEA Regulations 2007 & Amendments	Considered after Working Group Report, 2022	Corresponding clause of CEA Regulations and WGR
Point of Reference:					
Point of Interconnection (POI)					
Ambient Temperature	Temperature (°C)				
	Basis for consideration of such temperature				
Temperature extreme considered	Temperature (°C)				
	Basis for consideration of such temperature				
Rated active power output	At ambient temperature				
	At extreme temperature				
Reactive power capability at Rated active output	At ambient temperature				
	At extreme temperature				
Reactive Power Capability at design temperature (...degrees)	Dynamic*	Capacity (MVar)			
		Equipments <sup>\$</sup>			
	Static	Capacity			
		Equipments <sup>\$</sup>			
Particulars		Considered while bidding	Post WGR Report 2022		
Financial implication against Reactive Power equipments (Copy of Purchase Orders to be enclosed, where placed) (in Rs crores)	Towards installation of Dynamic compensation devices				
	Towards installation of				

	Static compensation devices		
Date of submission of Reactive Power study report to CTUIL/ concerned RLDC#			
Status of Compliance to Reactive Power Capability (compliant/ noncompliant)			
<p>* Provide a supporting study report showing the required MVAr capability.</p> <p>\$ Reactive Power support equipment planned to be installed before the Working Group Report, 2022, and additional equipment installed/ planned to be installed after the Working Group Report, and the financial impact thereof.</p> <p># Detailed Study Report pre and post-WGR 2022 to be submitted</p>			

(iv) How installation of capacitor banks complies with the clause B.2(1) of the CEA (Technical Standards for Connectivity to the Grid) Regulations, 2013 for the capability of supplying dynamically varying reactive power.

(v) Whether the Petitioner has given any undertaking to Grid-India for compliance with the CEA Regulations/ Working Group Report? If yes, submit a copy of the same.

(vi) The details of the additional equipments installed for meeting the new requirements as per the Working Group Report 2022, which is being claimed by the Petitioners as Change in Law as per the below table:

Project Name	Plant Capacity (in MW)	Bid cut-off date	SCOD	Date of FTC approval by Grid-India	COD	The equipment installed / planned be installed prior to the issuance of working group report	Additional equipments installed / proposed to be installed after the issuance of the working group report for which change in law claim is raised

(vii) The Petitioner is seeking declaration of the Report of the Working Group in July 2022 as a Change in Law event on account of issues such as Point of Interconnection, design of the generating station, rated reactive power at rated active power output and capability to operate at least up to the 'V Curve'. Furnish the increase in reactive power capability (in MVAR) on each such parameter, prior to working group report vs. after working group report as per the below table:

Sl. No.	Parameter	Maximum Reactive Power Capability (in MVAR) prior to	Maximum Reactive Power Capability (in MVAR) after

		working group report	working group report
1	Point of Interconnection (PoI) will be the 'point of reference' for the assessment of compliance with CEA Regulations.		
2	Requirement to demonstrate dynamic reactive power capability to operate at least up to the 'V Curve' boundaries (0.95 lag/lead).		
3	Requirement of designing the generating station considering temperature extremes.		
4	Generating Station should be able to deliver rated Reactive Power at the 'rated output'		

(e) The Grid-India to file the following information on an affidavit within four weeks in respect of the Petitioner's project:

<b>Project Name:</b>	POI:			
	Capacity (in MW):			
	COD (date-wise capacity declared COD):			
	Technology (Solar/ Wind/ Hybrid):			
	Nearest IMD Station			
<b>Project Particulars</b>		<b>Compliance status of the CEA Regulations before issuance of Working Group Report</b>	<b>Changes, if any, after issuance of Working Group Report for compliance</b>	<b>Corresponding CEA Regulation/ MoM/ letters etc.</b>
Temperature for compliance of Dynamic Reactive Power capability (in °C)				
Reactive Power (MVar) required to be complied	Dynamic			
	Static			
Reactive Power Compensation devices installed (in MVar) for compliance	Dynamic			
	Static			
Date of submission of Reactive Power compliance report by the Petitioner				Latest revision date (if any):
Status of Compliance of Reactive Power Capability*				Pre and Post WGR compliance status

*ATR for non- compliance, if so.			and basis for declaring so.
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3. The Petition will be listed for the hearing **26.6.2025**.

**By order of the Commission**  
**Sd/-**  
**(T.D. Pant)**  
**Joint Chief (Law)**