

Ref: ABC CT/CERC/Comments draft GNA (4th Amendment)/2025-26

Date:03/04/2025

To,
Shri Harpreet Singh Pruthi,
Secretary,
Central Electricity Regulatory Commission
6th, 7th & 8th Floors, Tower B, World Trade Centre,
Nauroji Nagar, New Delhi- 110029

Sub: Submission of comments on draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025

Respected Sir,

I am writing on behalf of ABC Cleantech Private Limited to submit our comments on the draft regulation titled Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State transmission System) (Fourth Amendment) Regulations, 2025.

We appreciate the opportunity to contribute our perspectives towards the development of this regulation. Our comments aim to highlight practical issues in regulations & bring more uniformity/ clarity for the benefit of all stakeholders.

We trust that our submission will receive your positive consideration. We are available to provide any further clarification or information.

Yours sincerely
For **ABC Cleantech Pvt. Ltd.**

Prashant Kanaujia
Authorized Signatory

Comments on Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025

Sl. No.	Draft Clause as per 4th Amendment	Proposed Clause	Rationale
1	2. Amendment to Regulation 2.1 of the Principal Regulations: A new Clause (q-i) shall be inserted after Clause (q) of Regulation 2.1 of the Principal Regulations as under: “(q-i)” Entities with Restricted Access” means REGS or ESS whose injection scheduling rights are restricted for solar hours or non-solar hours in accordance with Regulation 5.11 and Annexure-IV of these regulations;”	2. Amendment to Regulation 2.1 of the Principal Regulations: A new Clause (q-i) shall be inserted after Clause (q) of Regulation 2.1 of the Principal Regulations as under: “(q-i)” Entities with Restricted Access” means REGS, RPPD or ESS whose injection scheduling rights are restricted for solar hours or non-solar hours in accordance with Regulation 5.11 and Annexure-IV of these regulations;”	Since the Renewable Power Park Developer (RPPD) is also a connectivity grantee and has generation projects operating during both solar and non-solar hours, it is essential to ensure optimal utilization of the transmission capacity. The transmission system should be made available not only for Renewable Energy Generating Stations (REGS) and Energy Storage Systems (ESS) but also to accommodate the power generated by the RPPD across different time periods.
2	5.2 a The additional generation capacity under Regulation 5.2 of these regulations shall be subject to the following conditions: c) In case additional capacity for which approval is sought under Regulation 5.2 of these regulations is REGS (with or without ESS) or ESS (except PSP), the scheduled date of commercial operation for such additional capacity shall not be later than 18 months from date of approval by the Nodal Agency;	5.2 a The additional generation capacity under Regulation 5.2 of these regulations shall be subject to the following conditions: c) In case additional capacity for which approval is sought under Regulation 5.2 of these regulations is REGS (with or without ESS), RPPD or ESS (except PSP), the scheduled date of commercial operation for such additional capacity shall not be later than 24 months from date of approval by the Nodal Agency;	RPPD should be added in addition to REGS (with or without ESS) or ESS (except PSP), as RPPDs are responsible for developing large-scale renewable energy parks that host multiple REGS and hybrid projects. While an 18-month commissioning period is reasonable for solar and ESS, wind power projects require at least 24 months due to their complex development and installation requirements.
2	Annexure-IV Modalities of Restricted Access for Solar Hours and Non-Solar Hours of the day (1) Grant of Connectivity with restricted access to an entity covered under Regulation 5.11 (a) of these regulations: (a) Such entity	Annexure-IV Modalities of Restricted Access for Solar Hours and Non-Solar Hours of the day (1) Grant of Connectivity with restricted access to an entity covered under Regulation 5.11 (a) of these regulations: (a) Such entity shall be granted Connectivity with restricted access where:	During non-solar hours, it is possible that the connectivity system may have more transmission capacity available than what has been granted to the second grantee for use during those hours. This situation can arise when the first grantee, such as a REGS, ESS or RPPD, is not utilizing its full granted connectivity due to lower generation

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	<p>shall be granted Connectivity with restricted access where:</p> <p>i. during non-solar hours, it shall be allowed to inject upto the Connectivity quantum, subject to availability in the transmission system,</p> <p>ii. during the solar hours, the injection rights shall be vested with the entity covered under Regulation 5.11(b) or (c) of these regulations;</p> <p>Provided, such entity under Regulation 5.11(a) may enter into an agreement with an entity under Regulation 5.11(b) or 5.11(c) with either of them as a lead generator or appoint a QCA (in terms of Grid Code), to utilize the access of an entity under Regulation 5.11(b) or 5.11(c) for the purpose of injection during solar hours.</p> <p>(d) The scheduled date of commercial operation shall not be more than 18 months from the date of intimation of the in-principle grant of connectivity.</p>	<p>i. during non-solar hours, it shall be allowed to inject upto the available transmission capacity, subject to availability in the transmission system,</p> <p>ii. during the solar hours, the injection rights shall be vested with the entity covered under Regulation 5.11(b) or (c) of these regulations;</p> <p>Provided, such entity under Regulation 5.11(a) may enter into an agreement with an entity under Regulation 5.11(b) or 5.11(c) with either of them as a lead generator or appoint a QCA (in terms of Grid Code), to utilize the access of an entity under Regulation 5.11(b) or 5.11(c) for the purpose of injection during solar and non-solar hours.</p> <p>(d) The scheduled date of commercial operation shall not be more than 24 months from the date of intimation of the in-principle grant of connectivity</p>	<p>from renewable sources like solar. In such cases, it is logical to allow the second grantee to inject additional power into the grid, provided that the available transmission capacity permits it.</p> <p>This scenario is particularly relevant in the case of hybrid renewable energy projects, where the installed generation capacity—comprising a mix of solar, wind, and energy storage—may exceed the granted connectivity capacity. Since hybrid projects can optimize generation based on resource availability (e.g., higher wind generation during non-solar hours), allowing them to use any surplus transmission capacity can enhance grid efficiency and renewable energy integration.</p> <p>d) Wind power projects typically require a minimum of 24 months for commissioning due to several critical factors, including site selection, resource assessment, permitting, procurement of specialized equipment (such as wind turbines and towers), logistics, and installation challenges. In contrast, solar power projects and energy storage systems (ESS) generally have shorter development cycles, and an 18-month commissioning timeline is usually sufficient for these technologies</p>
3	<p>5.8 (d) The Renewable Power Park Developer shall furnish the scheduled date of commercial operation of the generating station under the Park prior to grant of final connectivity.</p>	<p>5.8 (d) The Renewable Power Park Developer shall furnish the scheduled date of commercial operation of the generating station under the Park prior to grant of final connectivity.</p>	<p>A RPPD develops a park with the objective of offering the infrastructure and connectivity to prospective RE developers for developing a RE project within the park. At the time of development of the park and securing the connectivity, the RE developer is not finalised. It</p>

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			<p>would not be possible for a RPPD to furnish the SCOD of the generating station, that too prior to grant of final connectivity. It is hence suggested that this proposed draft be removed.</p> <p>RPPD should required under Regulation 11A to intimate the Nodal Agency before six months from start date of connectivity, the details of the generation station(s) coming up within the park along with their SCOD(s).</p>
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