

Date: 03.04.2025

The Secretary
Central Electricity Regulatory Commission
6th, 7th & 8th Floors, Tower B, World Trade Centre,
Nauroji Nagar, New Delhi- 110029

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

Ref: Notification ref No. L-1/261/2021/CERC Dated: 03.03.2025

Dear Sir,

This has reference to the proposed Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations 2025 published for stakeholder consultation vide notification no. Notification ref No. L-1/261/2021/CERC Dated: 03.03.2025.

Accordingly, on behalf of Adani Green Energy Ltd, we are pleased to submit input and suggestions on the aforesaid draft regulation, and enclose herewith as **Annexure-I**.

We look forward to necessary consideration please.

Thank you,

Yours faithfully,
For & Behalf of Adani Green Energy Limited



Ravi Sinha
Sr. Manager- Regulatory Affairs

Encl. As above

ANNEXURE-I

Sl No.	Proposed provisions under the draft 4 th amendment to GNA regulation	Suggested provisions on behalf of Adani Green Energy Ltd	Rationale/Justification
1	<p>Clause 5.2 (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;</p>	<p>5.2 (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 be as per time period mentioned in the PPA/PSA and for other projects 18 months for ESS and 24 month for Wind (With or without ESS) from date of approval by the Nodal Agency or final grant of connectivity whichever is later;</p>	<p>Mandating a stringent timeline of 18 months for date of approval is impractical due to multiple issues as highlighted below:</p> <ol style="list-style-type: none"> 1. The existing connectivity is yet to be operational 2. The additional capacity if developed by any other entity under a PPA may not agree with a fixed timeline of 18 months. 3. For developing wind projects, the timeline of 18 months is insufficient. 4. The timeline for modification in existing infrastructure to accommodate additional generation capacity may stretch the timeline beyond 18 months
2	<p>Clause 5.2 (e) The entity which has already made an application or has been granted approval by the Nodal Agency under Regulation 5.2 of these Regulations prior to the date of effectiveness of these amendments, shall furnish the scheduled date of commercial operation for such additional capacity, within a period of two weeks from effectiveness of these regulations:</p> <p>Provided that, in case such additional generation capacity is REGS (with or without ESS) or ESS (other than PSP), the scheduled date of commercial operation for such additional capacity shall not be later than 18 months from the date of effectiveness of these amendments or date of approval by the Nodal Agency, whichever is later.</p>	<p>The entity which has already made an application or has been granted approval by the Nodal Agency under Regulation 5.2 of these Regulations prior to the date of effectiveness of these amendments, shall furnish the scheduled date of commercial operation for such additional capacity, within a period of two weeks from effectiveness of these regulations:</p> <p>Provided that, in case such additional generation capacity is REGS (with or without ESS) or ESS (other than PSP), the scheduled date of commercial operation for such additional capacity shall be time period mentioned in PPA/PSA and for all other projects, it shall not be later than 18 months for ESS and 24 month for Wind (With or without ESS) from the date of effectiveness of these amendments or date of approval by the Nodal Agency or final grant of connectivity, whichever is later.</p>	<p>Additionally, it is suggested to consider the project timelines from the date of final grant of connectivity or any approval granted later in respect of enhancement of connectivity to avoid any mismatch of timeline as may be communicated through final grant of connectivity subsequent to in-principle grant.</p>

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3	<p>Clause 5.8(vii)(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>The Renewable Power Park Developer shall furnish the scheduled date of commercial operation of the generating station under the Park within 6 months of prior to grant of final connectivity or within 15 days of entering in to ISA with any generator, whichever is earlier.</p> <p>Provided the start date of connectivity may be shifted or revised in line with the timeline /SCOD of the generations station within the park.</p> <p>Provided further that shifting of start date of connectivity prior to the date of original grant, shall be subject to system availability/feasibility.</p>	<p>The primary objective of a Renewable Energy (RE) park is to provide essential infrastructure and streamline the development process. Any park developer must obtain connectivity approval and establish the necessary infrastructure to attract developers to utilize its facilities.</p> <p>Mandating the declaration of the Scheduled Commercial Operation Date (SCOD) of projects prior to granting connectivity for an RE park may not be an effective approach. It is quite difficult for any Park to have a identified generator at the time of connectivity application basis that system planning can be done.</p> <p>A prerequisite timeline of six months is necessary for the park developer to collaborate with potential project developers and advertise the progress on infrastructure development.</p> <p>In any case, the Connectivity start date is already provided under the application as well as in the grant which should be allowed to be adjusted/deferred in line with the generator's timeline.</p>
4	<p>5.11.(b) Provided that while converting to restricted access, the Nodal Agency shall consider the application which such an entity may make for additional capacity under this Regulation 5.2 or Regulation 5.11(a) of these regulations, within a</p>	<p>5.11.(b) Provided that while converting to restricted access, the Nodal Agency shall consider the application which such an entity may make for additional capacity under this Regulation 5.2 or Regulation 5.11(a) of these regulations, within a period of <u>Six months for operational Project and Twelve Months for the project under</u></p>	<p>The current timeline of three months for identification of Wind/ESS generator for enhancement of connectivity is unrealistic and not practical.</p> <p>To onboard any other entity and to develop a business cases, commercial understanding, terms sheet finalization and a firm project completion timeline etc. takes significant time to mature.</p>

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	<p>period of three months from effectiveness of this Regulation:</p> <p>Provided further that if the quantum of Connectivity that can be made available for non-solar hours is less than 50 MW, such RES or RHGS shall not be considered for conversion as an entity with restricted access.</p>	<p>construction, from effectiveness of this Regulation:</p> <p>Provided further that if the quantum of Connectivity that can be made available for non-solar hours is less than 50 MW, such RES or RHGS shall not be considered for conversion as an entity with restricted access, however, same may be allowed for enhancement for self-use.</p> <p>Provided further that while converting the connectivity w.r.t. REHS or Solar with ESS into restricted access, access for respective Wind and ESS components to be allowed for 24 Hrs.</p>	<p>Thus, allowing an additional 6 months' timeline for operational projects and 12 months for under construction projects will make it more appealing and realistic for the developer to make an application for additional capacity.</p> <p>It is also submitted that in the case of conversion of connectivity w.r.t. Hybrid or Solar with ESS into restricted access, it must be ensured that access for respective Wind and ESS components may not be restricted during non-solar hours rather to be allowed for 24 Hrs.</p> <p>Further, any spare capacity less than 50 MW may be allowed for enhancement for self-use.</p>
5	<p>24.6 (i) (d)</p> <p>Connectivity granted to a Renewable Power Park developer shall be revoked for the corresponding capacity, if the Connectivity and corresponding GNA has been made effective in terms of Clause (a) of Regulation 22.4 of these regulations and generating station(s) within the Power Park fails to achieve COD on or before</p> <p><i>i. Scheduled date of commercial operation of the generation project as per LOA or PPA as extended or delayed</i></p>	<p>Connectivity granted to a Renewable Power Park developer shall be revoked for the corresponding capacity, if the Connectivity and corresponding GNA has been made effective in terms of Clause (a) of Regulation 22.4 of these regulations and generating station(s) within the Power Park fails to achieve COD on or before</p> <p><i>i. Expiry of Six month from Scheduled date of commercial operation or Long Stop Date of the generation project as per LOA or PPA as extended or delayed commissioning permitted by the Renewable Energy Implementing Agency or the distribution licensee or the authorized agency on behalf of distribution</i></p>	<p>Generators' timeline or the execution activities remain beyond the control of the park, and it can't even interfere with the project execution progress except for providing land and connectivity access as agreed under respective ISA. In such case, Park should not suffer for the generator's failure to achieve commissioning with their stipulated timeline rather park should be allowed exercise alternate option to utilize the connecting through any other generator by substituting the existing generator who got delayed. And for that some additional grace period may be allowed as proposed herein.</p>

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	<p><i>commissioning permitted by the Renewable Energy Implementing Agency or the distribution licensee or the authorized agency on behalf of distribution licensee, as the case may be.</i></p> <p><i>ii. Six months after the scheduled date of commercial operation for generating station(s) being set up without LOA or PPA."</i></p>	<p><i>licensee, as the case may be.</i></p> <p><i>ii. Twelve months after the scheduled date of commercial operation for generating station(s) being set up without LOA or PPA provided if the project is not impacted by any force majeure event or by any other event which is beyond reasonable control of the generator/Park."</i></p> <p><i>Provided during the grace period provided above Park may choose to substitute the exiting generator who are delayed by any other generator and submit such information to CTUIL before the expiry of such grace period to retain its connectivity corresponding to such delayed capacity.</i></p>	
6	Annexure IV (1)(d) (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.	(d) The scheduled date of commercial operation shall be as per their respective schedule as agreed under their respective PPA/PSA and for other projects it shall not be later than 18 months for ESS and 24 months for Wind (With or without ESS) from the date of intimation of the final grant of connectivity.	Same as above at Sr No (1)
7	<p>Modalities of Restricted Access for Solar Hours and Non-Solar Hours of the day</p> <p>1.(a). 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</p>	<p>Modalities of Restricted Access for Solar Hours and Non-Solar Hours of the day</p> <p>1.(a). Provided, such an entity under Regulation 5.11(a) may enter into an agreement with one or more entities which are eligible for connectivity under Regulation 5.11(b) or 5.11(c) may appoint a lead generator or a QCA (in terms of Grid Code), to utilize</p>	<p>This provision enables one or more entities to aggregate their available margins even during solar hours, which can be utilized by another fellow grantee entity having restricted access during solar hours.</p> <p>To fully optimize the transmission infrastructure and minimize generation losses due to injection restrictions up to the connectivity</p>

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	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.	the access/ margin available for the purpose of injection during solar hours	quantum, pooling of capacities at any CTU substation will facilitate the feasible integration of new wind projects with solar projects. The lead generator or the Qualified Coordinating Agency (QCA) will ensure that the cumulative capacity at the CTU substation does not exceed the total connectivity quantum.