



Date: 3rd April 2025

Ref No: ABREL/General/GOI/2025040301

To

Sh. Harpreet Singh Pruthi

Secretary, CERC

6th, 7th and 8th Floor,

World Trade Centre, Nauroji Nagar,

Safdarjung Enclave, New Delhi 110029

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

Dear Sir,

This is with reference to comments/ suggestions/ objections solicited from the stakeholders on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025.

We thank you for providing this opportunity and are pleased to furnish comments and suggestions on the draft amendment as enclosed herewith. We hope that you would find them useful and would consider appropriately while finalising.

Thanking you,

Yours faithfully,

For **Aditya Birla Renewables Limited**

A handwritten signature in blue ink, appearing to read "Vaibhav Kapoor", is written over a circular stamp.

Vaibhav Kapoor

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Enclosure: a/a

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Sr. No.	Regulation No.	Proposed Clause	Comments with Justification
1	<p>New clause proposed as 5.2a</p> <p><i>5.2 a The additional generation capacity under Regulation 5.2 of these regulations shall be subject to the following conditions:</i></p> <p><i>(a) Connectivity Bank Guarantee Conn-BG1 and Conn-BG3 under Regulation 8 of these regulations shall be furnished by the existing grantee for such additional generation capacity;</i></p> <p><i>(b)...</i></p> <p><i>(c)...</i></p> <p><i>(d) The applicant shall furnish documents required under Regulation 5.8.(xi) of these Regulations, as applicable, for such additional capacity, and shall also be subject to other Regulations including Regulation 11A, 11B, 24, 24.6 of these Regulations.</i></p>	<p>May kindly consider following deletion as indicated in bold below:</p> <p><i>5.2 a The additional generation capacity under Regulation 5.2 of these regulations shall be subject to the following conditions</i></p> <p><i>(a) Connectivity Bank Guarantee Conn-BG1 and Conn-BG3 under Regulation 8 of these regulations shall be furnished by the existing grantee for such additional generation capacity;</i></p> <p><i>(b)...</i></p> <p><i>(c)...</i></p> <p><i>(d) The applicant shall furnish documents required under Regulation 5.8.(xi) of these Regulations, as applicable, for such additional capacity, and shall also be subject to other Regulations including Regulation 11A, 11B, 24, 24.6 of these Regulations.</i></p>	<p>(a) The deletion is requested as the same Connectivity grantee has already furnished Conn-BG1 and Conn-BG3 and Land Documents/ Land BG towards maximum capacity allowed for injection</p> <p>(b) The inclusion of additional capacity improves the utilisation of transmission infrastructure and thus shall be promoted by not levying additional charges or bank guarantees</p> <p>(c) In any case the deterrent for delaying the commissioning of additional capacity has been introduced by including clause 24.6 (revoke) in proposed clause 5.2a(d)</p> <p>(d) Thus, request to not equate application under 5.2 with new applicant seeking non-solar hour connectivity (under proposed regulation 5.11), who has not furnished any BG or made any commitment</p> <p>(e) Even if such clauses are introduced, clarity is sought on implementation of 11A and 11B, eg: If Land BG is furnished against application in 5.2, will timeline for 50% land demonstration, as specified in regulation 11A, start from original grant or from approval of additional capacity.</p>
2	<p>Amendment proposed in Clause 5.8 (vii) by addition of sub-clause (d)</p> <p><i>(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.</i></p>	<p>May kindly consider following addition as indicated in bold below:</p> <p><i>(d) The Renewable Power Park Developer shall furnish the scheduled date(s) of commercial operation of the generating station under the Park prior to grant of final connectivity, which can be modified by maximum period of 18 months from start date of Connectivity with such revision allowed within 12 months of final grant</i></p>	<p>(a) It may be noted that Renewable Power Parks are generally established to include several Generating Stations</p> <p>(b) As all Generating Stations have different time schedules under their respective PPA obligations, provision shall be made to allow furnishing segregated dates for such Generating Stations</p>

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			(c) Further, as schedule of all Generating Stations are not known in the beginning itself, flexibility shall be provided to RE Parks to modify the schedule, as suggested
3	Amendment proposed in sub-clause (d) of Clause (1) of Regulation 24.6 <i>(d) 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,</i>	May kindly consider following addition as indicated in bold below: <i>(d) Connectivity granted to a Renewable Power Park developer shall be revoked for the corresponding capacity, subject to modification in schedule allowed in sub-clause (d) of regulation 5.8(vii), 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,</i>	The addition is made to incorporate the suggested addition in S.No. 2 above, such that revocation action considers the modified schedule furnished by the RPPD.
4	New additional Regulation 5.11 (b) proposed in Principal Regulations <i>(b) The In principle or final grant of Connectivity intimated to an REGS (with or without ESS) based on solar source or an RHGS with a combination of solar source with another source including ESS (including cases where GNA is effective) shall be converted as an entity with restricted access (corresponding to non-solar capacity during non-solar hours) within a period of one week after the expiry of three months from date of effectiveness of this Regulation:</i> <i>Provided that while converting to restricted access, the Nodal Agency shall consider the application which such an entity may make</i>	May kindly consider following substitution and addition as indicated in bold below: <i>(b) The In principle or final grant of Connectivity intimated to an REGS (with or without ESS) based on solar source or an RHGS with a combination of solar source with another source including ESS (including cases where GNA is effective) shall be converted as an entity with restricted access (corresponding to non-solar capacity during non-solar hours) within a period of one week after the expiry of three twelve months from date of effectiveness of this Regulation:</i> <i>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 three twelve months from effectiveness of this Regulation..</i>	(a) The addition is requested to allow for reasonable time required for deciding the additional capacity (b) May appreciate that decision on additional capacity entails significant capex that requires carrying out detailed activities such as, but not limited to: <ul style="list-style-type: none"> • resource assessment • energy modelling • modification in existing scheme • techno-commercial analysis • assessment on land availability as well as • seeking approval from internal company boards and investors The above activities require a minimum 12 months period and accordingly, such period is

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	<i>for additional capacity under this Regulation 5.2 or Regulation 5.11(a) of these regulations, within a period of three months from effectiveness of this Regulation..</i>		requested to decide in applying for additional capacity by existing Connectivity grantee.
5	<p>New additional Regulation 5.11 (b) proposed in Principal Regulations</p> <p><i>(b) The In principle or final grant of Connectivity intimated to an REGS (with or without ESS) based on solar source or an RHGS with a combination of solar source with another source including ESS (including cases where GNA is effective) shall be converted as an entity with restricted access (corresponding to non-solar capacity during non-solar hours) within a period of one week after the expiry of three months from date of effectiveness of this Regulation:</i></p>	<p>May kindly consider following addition as indicated in bold below, before the first proviso of sub-clause (b) of proposed Regulation 5.11:</p> <p><i>(b) The In principle or final grant of Connectivity intimated to an REGS (with or without ESS) based on solar source or an RHGS with a combination of solar source with another source including ESS (including cases where GNA is effective) shall be converted as an entity with restricted access (corresponding to non-solar capacity during non-solar hours) within a period of one week after the expiry of three months from date of effectiveness of this Regulation:</i></p> <p><i>Provided further that where In Principle or final grant of Connectivity intimated to an RHGS with a combination of solar source with wind source (including cases where GNA is effective) shall be converted as an entity with restricted access corresponding to 110% of non-solar capacity during non-solar hours for peak wind seasons</i></p>	<p>(a) May please note that Wind Turbines, during peak wind season, are capable of generating upto 10% additional energy, which in a typical RHGS gets injected owing to such energy generally getting generated in evening to morning period, ie when solar energy is not at its peak.</p> <p>(b) Such additional generation is one of the highlights of hybrid Projects, making such projects viable and capable of maximising the utilisation of both natural as well as transmission resources.</p> <p>(c) Thus, to not allow for such additional generation being wasted which would cause financial loss to RHGS Developers as well energy loss to the nation, a margin of 10% should be left for Wind Generation, especially in peak wind season which Grid India can declare for each state, as in the case of solar hours.</p> <p>(d) The above must be considered while allocating the connectivity freed up from solar hours to a new applicant for non-solar hours.</p>

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			The examples and annexure-4 may be suitably modified
6	<p>Amendment to Regulation 11A by introducing Clause (6)</p> <p><i>(6) Any changes in shareholding pattern of the Connectivity grantee upto CoD of the project shall be subject to the following:</i></p> <p><i>(a) The promoters of the Connectivity grantee shall not cede control (where control shall mean the ownership, directly or indirectly, of more than 50% of the voting shares of such Company or right to appoint majority Directors) of the Company.</i></p> <p><i>(b) In case the Connectivity grantee has multiple promoters (but none of the shareholders have more than 50% of voting rights and paid-up share capital), the shareholding pattern shall be maintained and cannot be changed upto COD of the project.</i></p>	<p>May kindly consider following addition as indicated in bold below:</p> <p><i>(6) Any changes in shareholding pattern of the Connectivity grantee (including in principle grant) upto CoD of the project shall be subject to the following:</i></p> <p><i>(a) The promoters of the Connectivity grantee (including in principle grant) shall not cede control (where control shall mean the ownership, directly or indirectly (through multiple subsidiaries structured in a parent-child hierarchy), of more than 50% of the voting shares of such Company or right to appoint majority Directors) of the Company.</i></p> <p><i>(b) In case the Connectivity grantee (including in principle grant) has multiple promoters (but none of the shareholders have more than 50% of voting rights and paid-up share capital), the shareholding pattern shall be maintained and cannot be changed upto COD of the project.</i></p>	<p>(a) The addition of in-principle grant has been suggested to disallow for trading of connectivity in the period from in-principle grant to final grant, in view of uncontrollable factors that can prolong the final grant of connectivity.</p> <p>(b) Additionally, suggest putting increased controls such that shareholding of ultimate promoters shall remain greater than 51% or be maintained same as time of application, as the case may be in subclause (b) / (c).</p> <p>(c) This shall address the apprehensions of multi-layered entities being formed where immediate promoter may remain the same, however ultimate promoter may change hands.</p> <p>Eg: An Ultimate Promoter A may form subsidiary B under which a subsidiary C may be formed to seek apply connectivity. Promoter A may then cede control of subsidiary B to Promoter D, while not disturbing shareholding pattern of subsidiary C since it is controlled by Subsidiary B.</p> <p>Above should also be controlled.</p>