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Date: Thu, 03 Apr 2025 18:18:38 +0530

Subject: Comments to 4th GNA Amendments (Draft) from AMPIN Energy Transition Pvt Ltd

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Dear Sir/Ma'am,

Please find attached the comments on the draft 4th amendments to GNA Regulations from AMPIN Energy Transition Pvt Ltd.

Regards,
Rohit Sharma



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1 Attachment(s) [Download as Zip](#)

Comments to 4th GNA Amendments.xlsx

269.4 KB

S.No	Clause no.	Draft 4th mendment	Suggestion	Rationale
1	5.2 (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;	Please allow the application for additional capacity can also be filed by Group Company of the existing Connectivity Grantee in concurrence with Regulation 5.7 (i.e. Submission of Sharing Agreement between Group Company and existing Connectivity Grantee). In such case, CONN BGs should be submitted by the applicant company.	Group Company of existing Connectivity grantee should be allowed to file additional Connectivity for BESS within 6 months from the Effectiveness of these Regulations
2	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	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 24 months from date of approval by the Nodal Agency	To charge the ESS component, additional solar/wind component would be required to be installed along with installation of BESS component. Therefore, min. 24 months timeline should be allowed for completion.
3		One time GNA charges	To be deleted since One Time GNA Charges for the commissioned capacity is already paid to Nodal Agency/will be paid to Nodal Agency one month prior to Project COD for which Connectivity is already granted.	Please remove the requirement of One Time GNA Charges payable by the Applicant seeking Connectivity under Regulation 5.2 (a)
4	Annexure IV: Clause 4	<u>Modalities of Restricted Access for Solar Hours and Non-Solar Hours of the day:</u> As on effectiveness of this Regulation, the Applicant(s) for whom an application for grant of Connectivity is under process and in principle grant of Connectivity is yet to be intimated, shall also be given three months from the date of effectiveness of this Regulation to make an application under Regulation 5.11(b) of these regulations for non-solar hours.	As on effectiveness of this Regulation, the Applicant(s) for whom the In-Principle Grant of Connectivity/Final Grant of Connectivity/Deemed GNA grant/ an application for grant of Connectivity is under process and in principle grant of Connectivity is yet to be intimated, shall also be given Six months from the date of effectiveness of this Regulation to make an application under Regulation 5.11(b) of these regulations for non-solar hours.	Existing Connectivity Grantees should be given atleast 6 months from the Effectiveness of these Regulations to apply for additional Connectivity application under Regulation 5.11 (b) This would help in better utilization of existing Connectivity infrastrure of the Connectivity Grantee who are willing to add BESS to the existing system