

Ref: CMES/CERC/PH/GNA-4 /2024-25/02

Date: 03.04.2025

To,

The Secretary**Hon'ble Central Electricity Regulatory Commission**

6th, 7th, and 8th Floor, Tower B, World Trade Centre,
 Nauroji Nagar, New Delhi – 110029

Ref: Public Notice Vide Notice No: L-1/261/2021/CERC, dated: 03.03.2025

Sub: Comments / Suggestions in the matter of Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the Inter-State Transmission System) (Fourth Amendment) Regulations, 2025

Dear Sir,

This is in reference to the above-mentioned subject matter. The undersigned would like to submit the following comments and suggestions on various provisions of the “*Central Electricity Regulatory Commission (Connectivity and General Network Access to the Inter-State Transmission System) (Fourth Amendment) Regulations, 2025.*”

We hereby submit our comments for your kind consideration. We hope that the hon'ble Commission will find merits in the submissions made with respect to the comments and suggestions in the above matter.

Sl. No.	Regulation and Sub-Clause	Comments and Suggestions
1.	<p>2.3. Following new Clauses, namely, Clause (ak-i), Clause (ak-ii) shall be added after Clause (ak) of Regulation 2.1 of the Principal Regulations as under:</p> <p>(ak-i) “<i>Solar hours</i>” means the time blocks of the day as declared by NLDC on each Saturday for the subsequent week starting from Monday to Sunday every week for each State based on anticipated solar insolation;</p> <p>(ak-ii) “<i>Non-Solar hours</i>”</p>	<p>The proposed inclusion of Clause (ak-i) and Clause (ak-ii), defining “<i>Solar hours</i>” and “<i>Non-Solar hours</i>”, introduces an important classification for grid management. However, the following concerns require due consideration before finalisation:</p> <p>Need for a Defined Methodology for Solar Hours Calculation:</p> <p>The regulation currently lacks a clear methodology for determining “<i>Solar hours</i>” Since these hours directly impact power scheduling, pricing, and grid operations, the Commission should explicitly outline the</p>

Sl. No.	Regulation and Sub-Clause	Comments and Suggestions
	means the time blocks other than 'Solar hours' of the same day;	<p>methodology to be followed by NLDC.</p> <p>Avoidance of Curtailment and Backing Down of Units:</p> <p>The regulation should include safeguards to ensure that no generating unit is forced to back down due to curtailment arising from this classification.</p>
2.	<p>3. New Regulation 5.2a</p> <p>3.1. A new Regulation, namely Regulation 5.2a. shall be added after Regulation 5.2 of the Principal Regulations, as under:</p> <p>5.2 a The additional generation capacity under Regulation 5.2 of these regulations shall be subject to the following conditions:</p> <p>(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;</p> <p>(b) The existing grantee shall intimate the scheduled date of commercial operation for such additional capacity;</p> <p>(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</p>	<p>Demand of Con BGs are a welcome move to ensure serious players / developers participate in the capacity allocation.</p> <p>However, it is also submitted that in line with the advisory of ministry of finance and ministry of power (Government of India) towards surety, apart from bank guarantee, the Insurance Surety Bonds should also be made as an option towards the same.</p> <p>Implementation Timeline & Practical Constraints:</p> <p>The said Regulation is set to come into effect from its notification date, approximately one month from today. As per the current provision, a developer is granted three months to add non-solar hour generating technology, which must be commissioned within 18 months.</p> <p>However, it has been observed that the effectiveness of GNA (General Network Access) dates for new and upcoming substations is typically 3-5 years from the date of application. In such cases, the existing clause creates a practical challenge, as developers would be constrained to commission the additional capacity within 18 months, even though the necessary infrastructure (substations and transmission connectivity) may not be available. Furthermore, technical constraints such as</p>

Sl. No.	Regulation and Sub-Clause	Comments and Suggestions
	shall not be later than 18 months from date of approval by the Nodal Agency;	grid readiness, weather conditions, and supply chain issues (especially in the case of battery energy storage systems) further hinder compliance with the prescribed timeline. Therefore, it is requested that the timelines be linked to commissioning of substation/start date of connectivity.
5.	<p>5. New Regulation 5.11</p> <p>5.1. A new Regulation 5.11 shall be added after Regulation 5.10 of the Principal Regulations, as under:</p> <p>“5.11 Entities with Restricted Access</p> <p>(a) An REGS (with or without ESS) based on Wind source or ESS may seek Connectivity with restricted access (non-solar hours) at a terminal bay of an ISTS substation:</p> <p>(i) Through a separate dedicated transmission system, or</p> <p>(ii) Which is already allocated to another REGS or Renewable Power Park, with restricted access (solar hours),</p> <p><i>Example:</i> An REGS (Wind - 400 MW, ESS - 200 MW) may seek Connectivity of 600 MW with restricted access rights, where injection scheduling rights during solar hours shall be Nil and injection scheduling rights during non-solar hours shall be 600 MW.</p>	<p>Inclusion of Renewable Power Parks:</p> <ul style="list-style-type: none"> The provision should explicitly state that Renewable Energy Parks (including Hybrid Renewable Energy Parks) are eligible applicants under this regulation. This will ensure that large-scale renewable projects with different generation sources can also benefit from restricted access connectivity provisions. <p>Mandatory Adherence to Clause (ii) in Case of Infeasibility of Clause (i)</p> <ul style="list-style-type: none"> The regulation should clearly establish that if a separate dedicated transmission system (Clause (i)) is not feasible, adherence to Clause (ii) (utilization of an already allocated terminal bay) becomes mandatory. The modalities for enforcing this provision should be defined, including technical and regulatory compliance measures to ensure smooth implementation. <p>Categorisation of solar and wind as behind the meter / off-grid exclusively developed for charging / supply of power to ESS:</p> <p>If a Solar or Wind generating source is commissioned exclusively for charging an Energy Storage System (ESS), clarity is needed on whether it will be categorised as Off-Grid, Behind-the-Meter (BTM), or part of the ISTS framework.</p>

Additional Submission:

1. The wind Turbines are available in different capacities like 2.7 MW, 3.3 MW, 5.1 MW etc. which many a times do not lead to meeting the exact capacity of connectivity taken. This leads to shortfall or excess of capacity by +/- 5.
2. It is submitted that in such cases if the capacity installed is in range of +/- 5 % of the overall capacity granted under connectivity / GNA the developer shall be permitted to short close the same without being considered as defaulter or being penalized for such short capacity till such time it is in this range.
3. Levy of Intra-State Transmission Charges:
The levy of transmission charges for long term GNA is on per MW basis. When the connectivity is shared between solar and non solar hours the levy of transmission charges on per MW basis on both the capacities is double recovery of the same. It is submitted that when the connectivity is split in solar and non solar hours and used for the same overall capacity on a per MW in any of the time block the transmission charges shall also be divided accordingly.

We believe the Hon'ble Commission will find merits in the comments / suggestions and consider the same while issuing the final orders.

Thanks and Best Regards

For & on behalf of Cleanmax Enviro Energy Solutions Pvt. Ltd.



Vidisha Dubey Srivastava
General Manager – Regulatory & Government Relations.
Ph: +917200615824
Email: vidisha.dubey@cleanmax.com