

Ref: HFE/CERC/GNA&C25/R&C/FY25-26/01

03 April 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

Subject: Suggestions/comments on draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2024.

Dear Sir,

At the outset, we extend our gratitude to the Hon'ble Central Electricity Regulatory Commission for issuing the draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2024 and seeking stakeholder's comments on the same.

We would like to introduce 'Hero Future Energies Private Limited' (HFEPL), the renewable energy arm of Hero group and an Independent Power Producer (IPP) primarily focusing on investment in developing the generating capacities based on solar and wind resources across the country. The HFEPL portfolio is having around 1.8 GW of commissioned capacity and around 2.6 GW under various stages of development.

Hero Future Energies Private Limited hereby submits its suggestions/comments on 'Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2024' and same are attached as **Annexure-I** to this letter. We humbly request CERC to consider our suggestions while finalising the amendments to the mentioned Regulations.

This letter is signed digitally, we request you to consider this communication as formally signed and submitted.

Thanking you.

For Hero Future Energies Pvt. Ltd.



Authorised Signatory

Enclosure: As above.

HERO FUTURE ENERGIES PVT. LTD.

CIN: U40101DL2012PTC243852

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Annexure I

Clause wise suggestions/ comments are mentioned in table below

Clause No.	Draft Amended Regulation	Change suggested	Rationale
Regulation (ak-i)	(ak-i) "Solar hours" 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>(ak-i) "Solar hours" 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><u>Provided that the nodal agency will take inputs from the existing developers before declaration of "Solar hours",</u></p>	<p>Solar projects are designed based on expected operating hours. If NLDC declares fewer solar hours than anticipated, projects could lose generation time, leading to financial losses. Seeking inputs from developers before finalizing these hours would ensure stability in project planning.</p> <p>Alternatively, the Commission could introduce a compensation mechanism for revenue loss during non-solar hours, especially when penalties arise due to PPA obligations.</p>
Regulation 5.2 a (a)	5.2 a The additional generation capacity under Regulation 5.2 of these regulations shall be subject to the following conditions:	5.2 a The additional generation capacity under Regulation 5.2 of these regulations shall be subject to the following conditions:	Conn-BG3 is meant for surplus capacity allocation in the transmission system. Since the additional capacity under this amendment utilizes the same connectivity without requiring new transmission infrastructure, mandating

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	(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;	(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;	another Conn-BG3 leads to unnecessary financial and administrative burdens for developers. Removing this requirement prevents redundant bank guarantee submissions for the same system.
Regulation 5.2 a (e)	<p>(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</p>	<p>(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 3 months 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 firm date of</p>	<p>There might be a case where the existing connectivity grantee is willing to add new element within the existing connectivity but with a separate agreement and offtaker. In that case fixing an SCOD of 18 months may not align with contractual commitments. Hon'ble Commission is requested to consider the contractual terms also.</p> <p>Providing flexibility will enhance transmission system utilization and allow developers to participate in auctions more effectively.</p>

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	effectiveness of these amendments or date of approval by the Nodal Agency, whichever is later.	connectivity plus 60 days date of approval by the Nodal Agency , or SCD date as mentioned in the PPA whichever is later.	
Regulation 5.11 (b)	<p>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:</p> <p>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)</p>	<p>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 Three month after the expiry of three months 1 year from date of effectiveness of this Regulation:</p> <p>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</p>	<p>Developers need sufficient time to decide whether to utilize connectivity during non-solar hours. A one-year transition period will allow proper planning, technical evaluation, and commercial negotiations, ensuring an efficient transition without abrupt changes.</p> <p>Hon'ble Commission is requested to allow at least 1 year time to developers to decide in case they wish to utilise their respective connectivity for non-solar hours.</p>

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	<p>of these regulations, within a 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>5.11(a) of these regulations, within a period of three months 1 year 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>	
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