

STAKEHOLDER COMMENT

Regulation No. : L-1/3/2025/CERC

Reference No. : 2/2025

Regulation Details

Reference No.	2/2025	CERC File Number	No. L-1/261/2021/CERC
Regulation No.	L-1/3/2025/CERC	Regulation No. Generation Date	01/04/2025

Regulation Type : Amendment

Regulation Title : Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021

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

Comment Details

Type : Stakeholder Comment

Stakeholder Name : India Power Corporation Limited (IPCLD)

Order Date / Direction of Commission / Compliance Date : 03/03/2025

Brief of Comments/Objections/Suggestions : Comments on Draft (Connectivity and GNA to the ISTS) Regulation, Fourth Amendment, 2025

COMMENTS ON DRAFT (CONNECTIVITY AND GNA TO THE ISTS) REGULATION, FOURTH AMENDMENT, 2025

Regulations	Amended Provisions	Comments
Regulation 2.1 (ak-i) & (ak-ii)	<p><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;</i></p> <p><i>(ak-ii) "Non-Solar hours" means the time blocks other than 'Solar hours' of the same day;</i></p>	<p>We request the Hon'ble Commission to also include the provision of disclosure of available solar and non-solar hour connectivity margins for each ISTS substations to be published by NLDC or CTUIL while declaring the Solar & Non-Solar Hours for efficient use of available transmission capacity, particularly by spreading the load between solar and non-solar generation hours, which is expected to improve the overall stability and efficiency of the grid.</p> <p>Further, we request the Hon'ble Commission to kindly clarify the treatment of Restricted Access in case of the solar generation exceeds beyond the time frame defined by NLDC as there is a limitation that during the periods of cloud cover. As per Regulation 12 of CERC (Sharing of Inter-State Transmission Charges and Losses) Regulations, Transmission Deviation Charges is applicable in case of generation exceeds the GNA quantum of such entities for such time blocks.</p>
Regulation 2.1 (q-1)	<p><i>"(q-i)" Entities with Restricted Access" means REGS or ESS whose injection scheduling rights are restricted for solar hours or non-solar hours in accordance with Regulation 5.11 and Annexure-IV of these regulations;"</i></p>	<p>We request the Hon'ble Commission to include the suitable provisions for availing Restricted Access to the Buyers/Discom's in so far as they should also be considered as Connectivity Grantee or Deemed Connectivity entities to ISTS under Regulation 17.1 (iii) to be covered under Regulation 4.1 of the Principal Regulation.</p> <p>Further, we request the Hon'ble Commission to provide suitable provisions for time denominated and varying connectivity of the bulk consumers/Discom's quantum for meeting their variable load.</p>
Regulation 5.2 & 5.11 (b)	<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>.....</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>In our humble opinion we feel that the proposal of the Hon'ble Commission to introduce Solar Hour Connectivity and Non-Solar Hour Connectivity is an innovative and forward-thinking solution aimed at maximizing the utilization of the existing inter-state transmission system. This will allow more efficient use of available transmission capacity, particularly by spreading the load between solar and non-solar generation hours, which is expected to improve the overall stability and efficiency of the grid. However, we request the Hon'ble Commission to kindly consider the following suggestions:</p>

Regulations	Amended Provisions	Comments
	<p><i>(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;</i></p> <p><i>.....</i></p> <p><i>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.....”</i></p> <p><i>“5.11 (b) (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 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 months from effectiveness of this Regulation:</i></p> <p><i>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.....”</i></p>	<ul style="list-style-type: none"> • It is important to highlight that the existing entities already providing the required Bank guarantee against the quantum of connectivity granted to them. Therefore, we humbly request not to insist for separate bank guarantee for such additional generation capacity. Further, we humbly request to kindly review the proposed stipulation of Bank Guarantee amount for the existing entities with respect to the restricted access scenario. • The consequences of delay in COD of the additional capacity which is beyond the control of the developer are however, not specified. A suitable remedy is required to be provided in the regulations for delay in COD beyond the SCOD for reasons beyond the reasonable control of the developer. • It is strongly suggested that proposal should not be implemented for existing solar generators to install storage for utilization of connectivity/GNA during non-solar hours within three months and installing within a period of 18 months, failing which connectivity/GNA during non-solar hours may be utilized to grant another connectivity through the same transmission system as ‘non-solar hour connectivity’ to another applicant. • The grant of Solar hours Connectivity and Non-Solar hours Connectivity through the same Transmission system in a time bound manner should be applicable only to new generators applying for fresh connectivity moving forward. The introduction of such a significant change should be reserved for future projects to ensure that it does not disrupt the financial and operational planning of existing generators. • Existing solar generators have already made significant investments in their plants, evacuation systems, and related infrastructure based on the regulatory framework that was in place at the time of their project development. These investments were made with the expectation of

Regulations	Amended Provisions	Comments
		<p>using the available grid capacity under the existing terms of connectivity. Retrospectively imposing in a time bound manner on these projects could be detrimental for the existing solar generators.</p> <p>Given these concerns, we recommend that the proposed requirement for Solar Hour and Non-Solar Hour Connectivity not be implemented within 3 months for existing projects. This will allow sufficient time for the existing projects to assess and adjust to the new framework without facing undue pressure or disruption to their operations.</p>
Regulation 5.11	<p><i>“5.1. A new Regulation 5.11 shall be added after Regulation 5.10 of the Principal Regulations, as under:</i></p> <p><i>“5.11 Entities with Restricted Access</i></p> <p><i>(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:</i></p> <p><i>(i) Through a separate dedicated transmission system, or</i></p> <p><i>(ii) Which is already allocated to another REGS or Renewable Power Park, with restricted access (solar hours),</i></p> <p><i>.....”</i></p>	<p>The concept of non-solar connectivity is welcomed and is novel in its nature to meet stated objectives. We request the Hon’ble Commission to kindly look into the following suggestions and concerns before the draft regulations get finalized:</p> <ul style="list-style-type: none"> • We propose that existing solar generators shall be given the priority for utilization of connectivity/GNA during non-solar hours by applying to CTUIL within 1 year from COD of the solar generator and installing (BESS/wind) within a period of 24 months thereafter. • It is also requested to mention the billing calculation methodology in case of restricted access scenario with suitable example for more clarity to the stakeholders.
Regulation 6.2	<i>Additional Comments</i>	<p>‘Augmentation required for immediate evacuation of Power of the Applicant (s) and overhead line for ISTS connectivity, excluding terminal bay(s), shall be considered as the Associated Transmission System (ATS) for the Applicant(s).’</p>
Regulation 22.4 (b)	<i>Additional Comments</i>	<p>We humbly request Hon’ble Commission to consider the following changes – ‘For entities covered under Regulation 17.1, in case the effective date of GNA intimated in the grant of GNA is to be revised keeping in view COD of the augmentation identified at the time of grant of the GNA or overhead line for ISTS connectivity, the Nodal Agency shall, at least 3 (three) months prior to the revised effective date of GNA, give a notice to such entities, indicating the revised date from which the GNA shall be effective.’</p>
Regulation 37	<i>Additional Comments</i>	Entities whose connectivity has been granted in

Regulations	Amended Provisions	Comments
– Arrangement for Transition		accordance with the connectivity regulations 2009, we request for the following amendment of clause (g) - On alignment of existing agreements under clause (f) of this Regulation, the entity shall become Connectivity grantee for all purposes under these regulations or to be aligned under clause (f) of this regulation shall be treated as connectivity grantee for all purposes under these regulations.