

Manish K. Singh
Secretary General

To,

The Secretary,
Central Electricity Regulatory Commission (CERC)
3rd & 4th Floor, Chanderlok Building,
36, Janpath, New Delhi- 110001

Subject: Comments / Suggestions in the matter of Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025.

Dear Sir,

Indian Wind Energy Association (InWEA) is an association registered at New Delhi to represent the interest of various stakeholders in wind energy sector across various states in India.

2. This is with reference to the Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025, published on website of Hon'ble Commission inviting comments on the same. Our observations are mentioned in **Annexure I** enclosed herewith.

3. At the outset, we would like to compliment the Hon'ble Commission's all past endeavours for promoting renewable energy in India. Considering the same, it is humbly requested that our detailed comments and observations enclosed herewith, may please be taken on record and due consideration may be given to each of the suggestion presented herewith, while determining the wind tariff for the review period in consideration. Further, I would like to request you that we want to attend the Public hearing in the matter which is scheduled on April 9, 2025.

4. I, Manish K Singh, am duly authorised by Indian Wind Energy Association to file these comments/suggestions on its behalf. I would also request you to allow us to present our views to commission in person in the hearing on this matter.

Thanking you,

Yours truly,



(Manish K Singh)

Encl: Annexure I

Indian Wind Energy Association

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Principle regulation GNA (2022) & 1 st (2023), 2 nd (JUN 2024) & 3 rd Draft (JULY 2024)	4 th Amendment GNA (2025)	Modification Proposed by Indian Wind Energy Association	Justification/ Rationalize
<p>5. Application for Grant of Connectivity</p> <p>5.2 Notwithstanding anything contained in Regulation 5.1, a generating station or ESS, with prior approval of CTU, shall be eligible to add, within the quantum of Connectivity granted to it, additional generation capacity or ESS, including the capacity owned by any other entity:</p> <p>Provided that the generating station or the ESS being the existing Connectivity Grantee shall be responsible for compliance with the Grid Code and other regulations of the Central Commission for such additional generation capacity including ESS as 'Lead generator' or 'Lead ESS' in</p>	<p>A new Regulation added after 5,2</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</p>	<p>5.2</p> <p>(a) Connectivity Bank Guarantee/ Surety bonds from insurance companies OR Letter of Credit from REC, PFC and IREDA will be accepted for 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</p>	<p>Regulation 5.2: Addition of Generation Capacity</p> <p>We are supporting the proposal that to additional generation capacity cab be applied within their granted connectivity quantum, however, certain points need to be highlighted which are as follows: -</p> <p>Suggested Modifications</p> <p>Bank Guarantee Requirements</p> <ul style="list-style-type: none"> Expand acceptable financial instruments beyond Bank Guarantees to include: <ul style="list-style-type: none"> Surety bonds from insurance companies Letters of Credit from REC, PFC, and IREDA Eliminate the requirement for additional Conn-BG3 when adding generation

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terms of clause (y)(ii) or clause (x)(ii) of Regulation 2.1, as the case may be: 3 Provided further that net injection at any point of time shall not exceed the quantum of total Connectivity granted to the existing Connectivity grantee.”	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;	<p>such additional capacity should be 24 months from the date when the additional capacity is granted, if the principal generation capacity falls within 24 months of the additional capacity award; alternatively, within 6 months following the connectivity start date of the principal generation capacity to which the additional generation capacity will be added;</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</p>	<p>capacity within existing connectivity</p> <ul style="list-style-type: none"> ○ Rationale: No additional transmission infrastructure is being created ○ Current proposal amounts to double recovery of Bank Guarantees for the same system <p>Application Timeline Flexibility</p> <ul style="list-style-type: none"> • Remove the 18-month restriction period before SCOD for Regulation 5.2 applications • Allow applications at any time, provided the SCOD of additional generation capacity is on or after the connectivity start date of

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		<p>such additional capacity shall not be later than 24 months from date of approval by the Nodal Agency;</p> <p>(d)</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 within three months of time after effectiveness of these regulations seek approval for additional generation capacity and shall furnish the scheduled date of commercial operation for</p>	<p>the principal generation capacity.</p> <p>SCOD Guidelines for Additional Capacity</p> <ul style="list-style-type: none"> • SCOD for additional generation capacity should be: <ul style="list-style-type: none"> ○ Minimum 24 months from the date of capacity grant (if principal generation capacity is within 24 months of award) ○ Within 6 months after the connectivity start date of the principal generation capacity. <p>Decoupling from Approval Dates</p> <ul style="list-style-type: none"> • SCOD should not be linked to the Nodal Agency approval date

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		such additional capacity, within a period of two weeks from effectiveness of these regulations.	<ul style="list-style-type: none"> Rationale: Application submission occurs before approval date is known <p>Illustrative Cases</p> <p>Case 1:</p> <ul style="list-style-type: none"> REGS granted final connectivity start date: September 2028 Application under Reg 5.2 submitted: April 2025 Expected approval: July 2025 Current calculation (18 months from approval): January 2027 Issue: SCOD falls before connectivity start date (September 2028) <p>Case 2:</p> <ul style="list-style-type: none"> If REGS granted final connectivity start date:

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			<p>March 2030 (linked to HVDC system)</p> <ul style="list-style-type: none"> Current regulation prevents application until 18 months prior to connectivity start date <p>Implementation for Existing Applicants</p> <ul style="list-style-type: none"> Include specific provision granting existing connectivity applicants at least a 3-month window after regulation amendment to seek approval for additional generation capacity This aligns with the intent expressed in the explanatory memorandum.
5.8...	5.8 (d) The Renewable Power Park Developer shall furnish the	5.8 (d) The Renewable Power Park Developer shall furnish the	Proposed Modification to Connectivity Requirements for

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(vii) In case of Renewable Power Park Developer, the documents shall be submitted in combination of clauses (a) and (b) or combination of clauses (a) and (c) as specified hereunder: (a) Authorisation by the Central Government or the State Government, as applicable, to undertake infrastructural activities including arrangement for Connectivity on behalf of solar power generators or wind power generators; (b) Registered Title Deed as a proof of Ownership or lease rights or land use rights for 50% of the land required for the capacity for which Connectivity is sought; (c) Bank Guarantee of Rs. 10 lakh/ MW in lieu of ownership or lease rights or land use rights of land for 50% of the land required	scheduled date of commercial operation of the generating station under the Park prior to grant of final connectivity.	scheduled date of commercial operation of the generating station under the Park prior to grant of final connectivity.	<p>Renewable Power Park Developers</p> <p>Challenge in the Proposal</p> <p>A Renewable Power Park Developer (RPPD) establishes infrastructure and secures grid connectivity for a park intended to host future renewable energy projects. However, at this development phase, specific RE developers have not yet been identified or finalized.</p> <p>Practical Limitation</p> <p>It is impractical to expect RPPDs to specify the Scheduled Commercial Operation Date (SCOD) of generating stations before final connectivity approval, as these details depend on future RE developers</p>

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for the capacity for which Connectivity is sought subject to provisions of Regulations 11A and 11B of these regulations			<p>who will construct projects within the park.</p> <p>Recommended Solution We suggest removing this requirement from the proposed draft regulation.</p> <p>Alternative Approach Instead, under Regulation 11A, RPPDs should be required to inform the Nodal Agency about details of upcoming generation stations and their respective SCODs at least six months before the connectivity start date.</p>
<p>11. Monitoring by the Nodal Agency</p> <p>11A</p> <p>(1) An applicantland use rights.</p>	A new Clause (6) shall be added after Clause (5) of Regulation 11A of the Principal Regulations, as under		<p>Shareholding Pattern Changes for Listed Connectivity Grantees</p> <p>Proposed Exemption Connectivity grantees that are publicly listed on stock</p>

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<p>(2) An applicantstart date of Connectivity of such applicant.</p> <p>(3) In case of Applicants Regulation 24.6 of these regulations.</p> <p>11.3a The Nodal Agency shallthe project by such entity.</p> <p>11.4. For optimal utilisationof the same ISTS sub[1]station.</p> <p>11.5. The Nodal Agencyon monthly basis.</p>	<p>(6) Any changes in shareholding pattern of the Connectivity grantee up to COD of the project shall be subject to the following:</p> <p>(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.</p> <p>(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.</p> <p>(c) Any change in shareholding pattern other than covered in sub-</p>	<p>(6) Any changes in shareholding pattern of the Connectivity grantee on or before COD of the project shall be subject to the following:</p> <p>a)</p> <p>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. This condition shall not be applicable for connectivity grantee which is a listed entity.</p> <p>(c) Any change in shareholding pattern of non-listed entities,</p>	<p>exchanges should be permitted to undergo changes in their shareholding pattern without requiring prior approval from the nodal agency.</p> <p>Alignment with Industry Standards</p> <p>This proposed exemption aligns with the Request for Selection (RfS) guidelines already established by Renewable Energy Implementing Agencies (REIAs).</p> <p>Regulatory Simplification</p> <p>This change would streamline regulatory compliance for publicly traded entities while maintaining appropriate oversight for non-listed companies.</p>

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	<p>clauses (a) and (b) shall require prior approval of the nodal agency and shall be filed for information of commission within 45 days of such approval. Nodal Agency may allow such application considering the practical requirement for change in shareholding.</p> <p>(d) In case any change in control or shareholding pattern of the Connectivity grantee is carried out in contravention to sub-clauses (a) to (c) of this Clause, the Connectivity shall be revoked, Bank Guarantee submitted under subclause (c) of Clause (vii) or sub-clause (c) of Clause (xi) of Regulation 5.8 of these regulations shall be encashed, and Conn-BG1, Conn-BG2 and Conn-BG3 shall be treated in terms of Regulation 24.2 or Regulation 24.3</p>	<p>other than covered in sub-clauses (a) and (b) shall require prior approval of the nodal agency and shall be filed for information of commission within 45 days of such approval. Nodal Agency may allow such application considering the practical requirement for change in shareholding.</p>	

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	of these regulations, as applicable.”		
	<p>Annexure-IV 1.....</p> <p>h) Connectivity Bank Guarantee: For cases covered under Clause (1)(e) of this Annexure, Connectivity Bank Guarantee viz Conn-BG2 and Conn-BG3, as the case may be, already furnished by an entity under Regulation 5.11(b) or 5.11(c) shall be shared on prorate basis between the entity under Regulation 5.11(b) or 5.11(c) and entity covered under Regulation 5.11 (a) of these regulations. Conn-BG1, as per Regulation 8 of these regulations shall be submitted separately by each entity.</p>	<p>Annexure-IV 1.....</p> <p>h) Connectivity Bank Guarantee: For cases covered under Clause (1)(e) of this Annexure, Connectivity Bank Guarantee/ Surety bonds from insurance companies OR Letter of Credit from REC, PFC and IREDA viz Conn-BG2 and Conn-BG3, as the case may be, already furnished by an entity under Regulation 5.11(b) or 5.11(c) shall be shared on prorate basis between the entity under Regulation 5.11(b) or 5.11(c) and entity covered under Regulation 5.11 (a) of these regulations. Conn-BG1, as per Regulation 8 of these regulations</p>	<p>Suggested Modifications Bank Guarantee Requirements</p> <ul style="list-style-type: none"> Expand acceptable financial instruments beyond Bank Guarantees to include: <ul style="list-style-type: none"> Surety bonds from insurance companies Letters of Credit from REC, PFC, and IREDA Eliminate the requirement for additional Conn-BG3 when adding generation capacity within existing connectivity <ul style="list-style-type: none"> Rationale: No additional transmission infrastructure is being created Current proposal amounts to double recovery of Bank

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		shall be submitted separately by each entity.	Guarantees for the same system