



एनएचपीसी लिमिटेड  
(भारत सरकार का एक नवरातन उद्यम)  
**NHPC Limited**  
(A Government of India Navratna Enterprise)



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NH/Commercial/GNA/2025/409

03.04.2025

**The Secretary**  
**Central Electricity Regulatory Commission,**  
**7<sup>th</sup> Floor, Tower-B, World Trade Centre**  
**Block-F, Nauroji Nagar, Safdurjung Enclave,**  
**New Delhi- 110 029**  
**Fax: 011-23753923**

**Sub:-Comments on draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025- Reg.**

**Ref:- Public Notice No L-1/261/2020/CERC dated 03.03.2025**

Sir,

In reference to above public notice dated 03.03.2025, the comments / suggestions / objections of NHPC on the draft CERC (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025 are enclosed for further necessary action. The comments / suggestions / objections have been uploaded through SAUDAMINI portal under 'e-Regulation'.

Thanking You,  
Encl: As above

Yours Sincerely,

  
(Ajay Shrivastava)  
General Manager -HOD Commercial

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**COMMENTS O NHPC ON DRAFT CENTRAL ELECTRICITY REGULATORY COMMISSION (CONNECTIVITY AND GENERAL NETWORK  
ACCESS TO THE INTER-STATE TRANSMISSION SYSTEM) (FOURTH AMENDMENT) REGULATIONS, 2025**

SI No.	Clause No.	Provision in the Draft Amendment	NHPC Suggestions/ Comments
1	3.1 (a)	<p>“.....5.2 a The additional generation capacity under Regulation 5.2 of these regulations shall be subject to the following conditions: (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>In the proposed amendment, it has been mentioned that if there is any additional generation capacity by the existing grantee, under Regulation 5.2 of the ibid Regulations, then Conn-BG1 and Conn-BG3 are to be furnished by the existing grantee for the additional generation capacity.</p> <p><b>Comments of NHPC:</b></p> <p>NHPC would like to submit that there can be a situation, that the existing grantee installs additional generation capacity within the quantum of Connectivity granted to it i.e. no additional quantum of connectivity is sought for such proposed additional generation capacity by the existing grantee. In that case, submission of Bank Guarantee Conn-BG1 and Conn-BG3 under Regulation for additional Connectivity does not seem reasonable. Therefore, it is proposed that Clause a of Regulation 5.2a may be modified as under:</p> <p><i>“.....5.2 a The additional generation capacity under Regulation 5.2 of these regulations shall be subject to the following conditions: (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, <b>if the existing grantee apply for additional quantum of connectivity; ...”</b></i></p>

**COMMENTS O NHPC ON DRAFT CENTRAL ELECTRICITY REGULATORY COMMISSION (CONNECTIVITY AND GENERAL NETWORK  
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2	5.1	<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) 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>In the proposed amendment, it is proposed that 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 and 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</p> <p><b>Comments of NHPC:</b></p> <p>NHPC would like to submit that “First right of Utilization” needs to be provided to existing grantees currently having connectivity with unrestricted access. Therefore, the proposed regulation may be modified as under:</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><b><i>Provided further that while considering the application for additional capacity under Regulation 5.2 or Regulation 5.11(a) of these regulations, shall give first preference to the application made by the existing grantee</i></b></p>
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			<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>
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