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Date: Thu, 03 Apr 2025 21:33:30 +0530

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

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Dear sir,

The above draft regulation is proposed as per, under section 178 of EA 2003.

The proposed regulation proposes to amend certain existing regulations, keeping in view the imminent requirement to consider access during solar hours and non solar hours for optimum utilization of transmission system..

To restrict the non serious players and trading of connectivity, changes in ownership or share holding pattern of company of the connectivity grantee till COD of the project have been proposed to be restricted

Other issues raised by CTUIL regarding the revocation of Connectivity for renewable power park developer and the issue of multiple start dates in a year by STU -for additional GNA

Keeping in view intermittent power generation by RE source (Solar & Wind), strategically deployed ESS can minimize the need for new coal capacity by supplying power during these critical periods.. Co located ESS can also significantly improve the utilization of these valuable Transmission assets.

Keeping this in view amendments in clauses 5.2a, 5.8 sub clause inserted, with new clause 5.11 added. We fully support these amendments.

Our disagreement is in changes proposed in amendment regulation 11 A on following grounds, the apprehension of Hon'ble Commission is that the developer after seeking/ reserving GNA does not come up in time on account of changes in ownership/ share holdings and ceases control in company. As huge investment in procuring land and arranging deposits/Bank guarantee for connectivity, the Principal developer arranging network access from CTUIL, even if trades and surrenders company's share holding, should not be a point of wrong contention. It helps, otherwise, in many ways to company, who wish to set up solar/ wind generation plant and fulfills all conditions of GNA, be considered in positive aspects, considering execution of project in given time frame. as it will be fast execution of projects.

Hon'ble Commission has considered example of SECI, (it is a trading company itself) here the Grantee of connectivity is required to make whose investment in buying 50 percent of land requirements in project as per connectivity permitted, we consider that land and arranging connectivity is a big issue, as time consuming and investment incurred, important part of total project, we feel delay could be due to arranging balance 50 percent land for projects by new company. As per our market research, most of the investors foreign/ local are attracted, with provision of buying company having 50 percent land and connectivity arranged.

We there propose that a definite information be collected by Hon'ble commission, before allowing this amendment, as to how many projects failed to start, adopting this path and what is their percentage. We feel whose investment in RE will not be available in country, if this amendment is permitted.

As a further security, Grantee may be advised to have in possession more land, may be 75 percent.

We request Commission to reject this amendment proposed in 11A.

Regards,

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