



Ref: 2025/ 03/03-04

Date:03-04-2025

To,
The Secretary,
Central Electricity Regulatory Commission
7th Floor, World Trade Centre,
Tower B, Naurojinagar,
New Delhi-110029

Sub.: Suggestions/Comments on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025 issued dt 03-03-25

Dear Sir

Greetings from Radiance Renewables Pvt Ltd!!!

With reference to the above-mentioned subject, we hereby submit our Comments/Suggestions on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025.

Sl. No	CERC draft regulations	Radiance Renewables Pvt Ltd comments /suggestions/clarifications
1	<p>5.2 a The additional generation capacity under Regulation 5.2 of these regulations shall be subject to the following conditions:</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 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>	<p>The timeline being provided for commercial operation for additional generation capacity appears to be too stringent considering the following realities:</p> <ol style="list-style-type: none">1. The approval from the Nodal Agency gets delayed due to the factors beyond the control of developers.2. Even though the approval from Nodal Agency is secured within the prescribed time limit in actual, the execution of project may get delayed owing to the severe ROW issues.3. On time availability of the Solar PV panels either through import or Indian market is a matter of great uncertainty.4. The levy of taxes on the import Solar PV panels is another challenge and volatile due

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	<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 effectiveness of these amendments or date of approval by the Nodal Agency, whichever is later.</p> <p>Provided also that such additional generation capacity shall also comply with Clauses (a) to (d) of this Regulation, within a period of one month from the date of effectiveness of this Regulation, failing which approval for such additional generation capacity shall be revoked."</p>	<p>to many international issues.</p> <p>5. The forfeiture of Conn-BG1 and Conn-BG3 in case of commercial operation is not achieved within 18 months from the date of approval of Nodal Agency will lead to a heavy penalty.</p> <p>Considering all above facts, we request CERC to reconsider the connectivity validity to at least 24 months and later if the project is not completed within this stipulated period due to valid reason, then consider for a time extension in two stages for 6 months each.</p> <p>Therefore, reasonable time limit extension for the execution of the projects be granted as a force majeure event.</p>
2	<p>5.11 Entities with Restricted Access</p> <p>(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 period of 01 week after the expiry of 03 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) 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 entity with restricted access.</p>	<p>Considering the various practical challenges being faced by the project developers, the conversion of entity with restricted access within a week period is too short.</p> <p>Also, the procedure of conversion of entity with restricted access has not been laid down in the proposed amendment. More clarification on this aspect is needed to check the adequacy of timeline mentioned.</p> <p>Request CERC to reconsider the timeline and provide appropriate and reasonable timeline for conversion.</p>

3	<p>5.11 Entities with Restricted Access</p> <p>(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:</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) 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>For Eg: RHGS (Solar-800MW, ESS-200MW) having connectivity of 1000MW have injection rights of 1000MW during solar hours. Since ESS of 200 MW is capable of injecting power during non solar hrs.</p> <p>In this case, do existing grantee have any injection rights or it has to apply for separate connectivity for non-solar hrs.</p> <p>Or</p> <p>Will Energy Storage Systems (ESS) be classified as Ancillary Services under the CERC Ancillary Services Regulations, 2022, or will the same be treated as a Renewable Energy Generating Station (REGS)?</p> <p>If ESS is classified as Ancillary Services, what would be the process for scheduling these services as per these regulations</p>
4	<p>5.11 Entities with Restricted Access</p> <p>(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:</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) 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 all the examples, for calculating the injection scheduling rights during solar & non-solar hours, ESS capacity is considered in addition to wind capacity. Since, ESS capacity is totally controllable source of energy and the working philosophy of ESS is varying case to case, the terms “injection scheduling rights during solar hours” and “injection scheduling rights during non-solar hours” shall be renamed as “maximum injection scheduling rights during solar hours” and “maximum injection scheduling rights during non-solar hours” so that developer is flexible in choosing the injection limits as required based on the working philosophy of ESS.</p> <p>Also, the developer shall be made liable to pay the applicable BGs based on the injection limits required during solar & non-solar</p>



	<p>Examples:</p> <p>(ii) If an RHGS (Solar - 700 MW, Wind - 400 MW, ESS – 200 MW) having Connectivity of 1000 MW shall have restricted access rights, where injection scheduling rights during solar hours shall be for 1000 MW and injection scheduling rights during non-solar hours shall be 600MW (400 MW Wind + 200 MW ESS).</p>	<p>hours. Developer shall be allowed to choose any limit within the maximum injection limits as described above.</p>
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With Thanks & Regards,

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