

Date:-03rd April 2025

To
The Hon'ble Secretary,
Central Electricity Regulatory Commission,
Chanderlok Building, 3rd & 4th Floors,
West Wing, 36, Janpath,
New Delhi - 110 001
India

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

Dear Sir,

With reference to the invitation for comments/suggestions on the Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025, we would like to extend our sincere appreciation to the Government of India and CERC for their unwavering commitment to strengthening the regulatory framework in the energy sector.

The proposed amendment represents a progressive step towards optimizing the inter-State transmission system, fostering seamless connectivity, and promoting the integration of renewable energy projects. We commend the comprehensive approach taken to address industry challenges while maintaining the vision of a sustainable and resilient energy future.

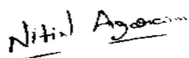
We are grateful for the opportunity to present our views and suggestions on the proposed amendments. Our inputs, detailed in the attached document, are aimed at enhancing the effectiveness and practicality of the regulations while ensuring a balanced approach to connectivity and network access. We firmly believe that these suggestions will help streamline the implementation process and contribute to the overarching goal of maximizing renewable energy integration.

The consistent support from CERC in addressing industry concerns through previous amendments has significantly propelled the growth of renewable energy deployment across the country. We remain confident that the proposed Fourth Amendment will further strengthen the transmission network and facilitate the smooth execution of large-scale renewable projects.

We highly value the opportunity to contribute to this important regulatory process and sincerely thank the Hon'ble Commission for its continued efforts to build a robust and sustainable energy infrastructure.

Thanking you for your understanding and consideration.

Yours sincerely,



Nitin Agawal
CEO
Rajasthan Solar Association

S. No	Existing Clause as per 4th Amendment - Draft	Proposed Clause	Rationale
1	<p>A new Regulation, namely Regulation 5.2a. shall be added after Regulation 5.2 of the Principal Regulations, as under: " 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) The existing grantee shall intimate the scheduled date of commercial operation for such additional capacity; (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; (d) The applicant shall furnish documents required under Regulation 5.8.(xi) of these Regulations, as applicable, for such additional capacity, and shall also be subject to other Regulations including Regulation 11A, 11B, 24, 24.6 of these Regulations. (e) The entity which has already made an application or has been granted approval by the Nodal Agency under Regulation</p>	<p>• Remove the requirement of submitting additional Connectivity Bank Guarantee (Conn-BG3) for additional generation capacity within the existing connectivity quantum, as this constitutes duplication since no new transmission infrastructure is involved.</p> <p>• The period granted to existing connectivity holders to seek approval for additional generation capacity should be increased from three months to twelve months from the effective date of these regulations.</p> <p>Rationale: The submission of Conn-BG3 for additional generation capacity within an existing granted connectivity quantum results in unnecessary duplication, as no new transmission infrastructure is required.</p> <p>Additionally, the current three-month timeframe is insufficient for completing critical tasks such as land acquisition and necessary documentation. Extending this period to twelve months ensures that project developers can adequately prepare and fulfill regulatory requirements effectively.</p> <p>Additional Comment:</p> <p>• It is suggested that solar energy associated with Energy Storage Systems (ESS) designated for use during non-solar hours should be</p>	<p>This clarification would prevent potential ambiguity regarding connectivity status and streamline regulatory compliance for hybrid energy projects incorporating storage solutions.</p>