



SPDA/RV/2025/53

April 3rd, 2025

**The Secretary
Central Electricity Regulatory Commission
6th, 7th & 8th Floors, Tower B,
World Trade Centre, Nauroji Nagar,
New Delhi- 110029
Email: secy@cercind.gov.in**

Sub: Request for consideration of our comments on the draft CERC (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025.

Respected Sir,

Greetings from SPDA!

SPDA is an independent industry association; committed towards promoting energy transition in India. We provide a neutral platform for policy advocacy, discussions and consensus building on issues critical to the development of the renewable and green fuel sector.

SPDA represents about 50-member companies across the gamut of renewables and green fuel industry including solar, wind, hybrid, BESS, green hydrogen and green ammonia sectors, providing assistance in policy evolution and healthier investment climate for renewable energy and green fuel projects and services. The member companies of SPDA include all the large players who have actively contributed with more than 75% of total renewable capacity under operation in India. Most of the members are developing an active pipeline of green hydrogen and green ammonia projects in the country.

With reference to the draft CERC (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025 uploaded on the Hon'ble Commission's website, we have analyzed the draft proposal and based on the feedback received from our members, would like to submit our suggestions (placed as Annexure-1) for the kind consideration of the Hon'ble Commission.

We request that the aforesaid suggestions shall be favorably considered.

Thanking You

Yours sincerely

**Ravi Verma
Member – Governing Council**

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**SPDA comments on Draft CERC (Connectivity and General Network Access to the Inter-State Transmission System)
(Fourth Amendment) Regulations, 2025**



Sl. No.	Existing Regulation Number	Existing Regulation clause	Proposed Changes by SPDA	SPDA Rationale / Justifications
1.	Regulation 2.3	<p>Following new Clauses, namely, Clause (ak-i), Clause (ak-ii) shall be added after Clause (ak) of Regulation 2.1 of the Principal Regulations as under:</p> <p>“</p> <p>(ak-i) “Solar hours” means the time blocks of the day as declared by NLDC on each Saturday for the subsequent week starting from Monday to Sunday every week for each State based on anticipated solar insolation;</p> <p>(ak-ii) “Non-Solar hours” means the time blocks other than ‘Solar hours’ of the same day;</p>	<p>Following new Clauses, namely, Clause (ak-i), Clause (ak-ii) shall be added after Clause (ak) of Regulation 2.1 of the Principal Regulations as under:</p> <p>“</p> <p>(ak-i) “Solar hours” means the time blocks of the day as declared by NLDC on each Saturday Friday for the subsequent week starting from Monday to Sunday every week for each State based on anticipated solar insolation;</p> <p>(ak-ii) “Non-Solar hours” means the time blocks other than ‘Solar hours’ of the same day;</p>	<p>Declaration of the solar hours on Friday will provide enough room for the forecasting and scheduling team to engage and submit the day ahead forecasts for upcoming Monday of the subsequent week duly accounting in the changes in the hours if any. IN case these hours are declared on Saturday late business hours, the effective time to take a note of any changes may get lowered thus affecting the submission of day ahead schedules.</p> <p>It may also be noted that there may be cases or locations where the solar generation may start early or till late but the solar hours declared may not include the early /late generation hours leading to developers losing the revenue for the limited generation during such hours.</p> <p>Further, the declaration of such solar and non-solar hours must be made after due consultation with the project developers. A methodology or</p>

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				<p>mechanism of fortnightly or monthly discussions may be institutionalised so as to ensure the developers interests are protected.</p> <p>It is requested that the solar hours may be declared by the NLDC on each Friday for the subsequent week starting from Monday to Sunday and a mechanism may be developed for discussion with project developers prior to declaration of solar hours.</p>
2.	New Regulation 5.2a	<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>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>It may be kindly be noted that the Conn BG-1 and Conn BG-3 were not the requirements enunciated in the Principal Regulations and the two amendments thereafter.</p> <p>The additional generation capacity is being added under the same connectivity quantum for which the required Conn-BGs have been duly submitted by the Connectivity Grantees. The other compliances including intimation of scheduled date</p>

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				<p>of commercial operation as well furnishing of documents under Regulation 5/8 (xi) as applicable will be met.</p> <p>It is to submit that additional Conn-BGs does not make a valid case for seeking connectivity for additional generation capacity under the existing connectivity quantum.</p> <p>We request that the requirement of Conn-BGs for additional capacity may be removed.</p>
3.	New Regulation 5.2a	(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;	(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; be at least 24 months or as per the PPA	It is to submit that in accordance within the bidding guidelines for solar, wind, solar-wind hybrid as well as FDRE projects notified by the Ministry of Power, the minimum timeline for commencement of supply of power is 24 months. Relevant extracts from the TBCB Guidelines for Solar projects is quoted as under:

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			or the firm date of connectivity whichever is later	<p>“13.2. Commencement of Supply Schedule</p> <p><i>(a). The Developer / Solar Power Generator shall generally commence supply of power, within a period of:</i></p> <p><i>(i). 24 (twenty-four) months from the date of execution of the Power Purchase Agreement, where the quantum allotted to the Developer / Solar Power Generator is not more than 1000 MW;</i></p> <p><i>(ii). 30 (thirty) months from the date of execution of the Power Purchase Agreement, where the quantum allotted to the Developer / Solar Power Generator is more than 1000 MW.”</i></p> <p>Thus, it is requested that generators/connectivity applicants may be allowed to provide the scheduled date of commercial operation of atleast 24 months extending upto 30 months (depending upon the project</p>

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				capacity) or the PPA or the firm date of connectivity whichever is later.
4.	New Regulation 5.2a	<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>(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 two months 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. be at least 24 months or as</p>	<p>It is to submit that two weeks is a very short period for the applicant or grantees to furnish the scheduled date of commercial operation. Adequate time is required for the entities to provide such details as these are linked to capital investments, land acquisition, production and shipping lead times and execution timeline.</p> <p>We request that atleast 2 months from the effective date of the Regulations must be provided to applicants/grantees to furnish the scheduled date of commercial operation for such additional capacity</p> <p>It is to submit that in accordance within the bidding guidelines for solar, wind, solar-wind hybrid as well as FDRE projects notified by the Ministry of Power, the minimum timeline for commencement of supply of power is</p>

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			per the PPA or the firm date of connectivity whichever is later	<p>24 months. Relevant extracts from the TBCB Guidelines for Solar projects is quoted as under:</p> <p>“13.2. Commencement of Supply Schedule</p> <p><i>(a). The Developer / Solar Power Generator shall generally commence supply of power, within a period of:</i></p> <p><i>(i). 24 (twenty-four) months from the date of execution of the Power Purchase Agreement, where the quantum allotted to the Developer / Solar Power Generator is not more than 1000 MW;</i></p> <p><i>(ii). 30 (thirty) months from the date of execution of the Power Purchase Agreement, where the quantum allotted to the Developer / Solar Power Generator is more than 1000 MW.”</i></p> <p>Thus, it is requested that generators/connectivity applicants may be allowed to provide the</p>

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				scheduled date of commercial operation of atleast 24 months extending upto 30 months (depending upon the project capacity) or the PPA or the firm date of connectivity whichever is later
5.	Amendment to Regulation 5.8	... “(d) The Renewable Power Park Developer shall furnish the scheduled date of commercial operation of the generating station under the Park prior to grant of final connectivity.”	... “(d) The Renewable Power Park Developer shall furnish the scheduled date of commercial operation of the generating station under the Park prior to within one month of grant of final connectivity.”	<p>Renewable Power Park comprises of several generation units which may have different date of commercial operation depending upon the agreed timelines with the Renewable Power Park Developer.</p> <p>There are cases where a Renewable Power Park Developer is unable to secure generators for the entire land parcels of the Park and subsequently engages with different developers for the remaining parcels.</p> <p>Thus, determination of scheduled date of commercial operation for various generating stations under the Park will be different.</p>

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				<p>Moreover, the period between intimation of in-principle grant of connectivity and final grant of connectivity is not sacrosanct by the CTUIL. There have been occasions where there have been a gap of several months between these two dates.</p> <p>Thus, we request that Renewable Power Park Developer must be allowed to furnish the scheduled date of commercial operation of the generating station under the Park within one month of grant of final connectivity</p>
6.	New Regulation 5.11	5.11 ... (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	5.11 ... (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	The conversion of in-principle or final grant of connectivity to entity with restricted access is a fairly new provision and has not been in-practice. Implementation of the same within 3 months appears to be a too short timeline wherein the generators, RLDC, NLDC must engage together to ensure the overall grid operations are not hampered. Further, such provisions

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		<p>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>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 one year 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 1 year from effectiveness of this Regulation:</p>	<p>need to be made aware to the project lenders who are used to the exclusive rights of connectivity secured by the project which is funded by them.</p> <p>Thus, we request that a timeline of at least one year wherein multiple workshops, stakeholder consultations and simulations must be provided to ensure smoother grid operations.</p> <p>Further, the decision of including additional generation capacity is a management decision based on the nature of capital investment required, offtaker, lender permissions, land acquisition, production and shipping lead times and execution timeline.</p> <p>A period of 3 months from the date of effectiveness of the Regulations is a short period for such a capital decision to make with firm commitments on scheduled date of commercial operation.</p>

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				Therefore, it is requested that Nodal Agency must consider applications made by entities within a period of 1 year from effectiveness of this Regulation
7.	Regulation 11A (6)	“(6) Any changes in shareholding pattern of the Connectivity grantee upto CoD of the project shall be subject to the following: ...	“(6) Any changes in shareholding pattern of the Connectivity grantee upto CoD of the project shall be subject to the following: ... Provided that the clauses (a) to (d) above shall not be applicable for connectivity applications submitted prior to the date of effectiveness of these Regulations. Notwithstanding the above, any changes in the shareholding pattern of connectivity grantee within the same Parent Group, upto CoD of the project shall be allowed.	The objective of these changes is to allow the changes in shareholding made within the same Parent Group to be recognised and allowed. Further, these provisions of the Regulations must be applicable on a prospective basis and must not affect the connectivity applications made before the date of effectiveness of the Regulations.

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8.	Annexure - IV	9.1 (1) (d) The scheduled date of commercial operation shall not be more than 18 months from the date of intimation of the in-principle grant of connectivity.	9.1 (1) (d) The scheduled date of commercial operation shall not be more than 18 months 24 months from the date of intimation of the in-principle grant of connectivity.	Similar to Pt 3 above