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Date: Thu, 03 Apr 2025 16:39:58 +0530

Subject: : Comments \_ Draft GNA Fourth Amendment Reg.

===== Forwarded message =====

Dear Sir/Madam ,

This is with reference to the comments invited by the Hon?ble Commission on Connectivity and General Network Access to the inter-State Transmission System (Fourth Amendment) Regulations, 2025.

In this regard, we Torrent Power Limited take this opportunity to express our gratitude for giving us an opportunity to submit our comments/ suggestions on the subject matter.

We earnestly request you to give due consideration to our comments/ suggestions attached herewith while finalizing the said notification.

Regards

**Manvesh Parekh**

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**1 Attachment(s)** Download as Zip

Comments Torrent Power Limited\_CE... .pdf  
297.5 KB

**Torrent Power Limited - Comments/ Suggestions on Draft Connectivity and General Network Access to the inter-State Transmission  
System Fourth Amendment Regulations, 2025.**

Sl. No.	Description	Suggestion	Rationale
	(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;	(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 & <b>considering inputs from developers. NLDC should develop a procedure for compensation against financial loss due to deviation in actual Solar hours and declared Solar hours by NLDC itself.</b>	In this regard we would like to submit that the solar & non solar hours are very crucial components for developers for calculating the project IRR and any changes in that may cause severe loss to the existing entities. Considering this we would like to humbly submit that Hon'ble Commission may consider modifying this clause as the Solar & Non-Solar hours will be declared by NLDC on prior consultation with developers and also direct NLDC to develop a procedure for compensation against financial loss due to deviation in actual Solar hours and declared Solar hours.
1.	5.2 a (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;	5.2 a (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 <del>not be later than 18 months from date of approval by the Nodal Agency;</del> <b>be as per the PPA/LOA of that additional capacity.</b>	In this regard we would like to submit that SCOD of the additional capacity shall be aligned with the SCOD mentioned in the PPA/LOA of the grantee i.e. 24 months or so and as extended or delayed commissioning due to Force Majeure events.
2.	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 entity with	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 entity with restricted access (corresponding to	We would like to humbly request Hon'ble commission that the period of 3 months is very short duration for taking the crucial decisions like viability of additional capacity and other related activities. Considering this we request that existing

	restricted access (corresponding to non-solar capacity during non-solar hours) <b>within a period of one week after the expiry of three months from date of effectiveness of this Regulation:</b>	non-solar capacity during non-solar hours) <b>within a period of one week after the expiry of three months <del>three months</del> six months</b> from date of effectiveness of this Regulation:	holders should be given the time at least six months before this conversion.
3.	<p>(6) Any changes in shareholding pattern of the Connectivity grantee upto CoD of the project shall be subject to the following:</p> <p>(a) The promoters of the Connectivity grantee shall not cede control (where control shall mean the ownership, directly or indirectly, of more than 50% of the voting shares of such Company or right to appoint majority Directors) of the Company.</p> <p>(b) In case the Connectivity grantee has multiple promoters (but none of the shareholders have more than 50% of voting rights and paid-up share capital), the shareholding pattern shall be maintained and cannot be changed upto COD of the project.</p> <p>(c) Any change in shareholding pattern other than covered in sub-clauses (a) and (b) shall require prior approval of the nodal agency and shall be filed for information of commission within 45 days of such approval. Nodal Agency may allow such application considering the practical requirement for change in shareholding.</p> <p>(d) In case any change in control or shareholding pattern of the Connectivity grantee is carried out in contravention to sub-clauses (a) to (c) of this Clause, the Connectivity shall be revoked, Bank Guarantee submitted under subclause (c) of Clause (vii) or sub-clause (c) of Clause (xi) of Regulation 5.8 of these regulations shall be</p>	<p>(6) Any changes in shareholding pattern of the Connectivity grantee upto CoD + 1 year of the project shall be subject to the following:</p> <p>(a) The promoters of the Connectivity grantee shall not cede control (where control shall mean the ownership, directly or indirectly, of more than 50% of the voting shares of such Company or right to appoint majority Directors) of the Company.</p> <p>(b) In case the Connectivity grantee has multiple promoters (but none of the shareholders have more than 50% of voting rights and paid-up share capital), the shareholding pattern shall be maintained and cannot be changed upto COD of the project.</p> <p>(c) Any change in shareholding pattern other than covered in sub-clauses (a) and (b) shall require prior approval of the nodal agency and shall be filed for information of commission within 45 days of such approval. Nodal Agency may allow such application considering the practical requirement for change in shareholding.</p> <p>(d) In case any change in control or shareholding pattern of the Connectivity grantee is carried out in contravention to sub-clauses (a) to (c) of this Clause, the Connectivity shall be revoked, Bank Guarantee submitted under subclause (c) of Clause (vii) or sub-clause (c) of Clause (xi) of Regulation 5.8 of these regulations shall be encashed, and Conn-BG1, Conn-BG2 and ConnBG3 shall be treated in</p>	In order to safeguard the interest of the serious committed, and sincere applicants it is requested that Hon'ble Commission may consider the suggested modification in this clause.

	encashed, and Conn-BG1, Conn-BG2 and ConnBG3 shall be treated in terms of Regulation 24.2 or Regulation 24.3 of these regulations, as applicable.”	terms of Regulation 24.2 or Regulation 24.3 of these regulations, as applicable.”	
4.	<p>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.”</p> <p><b>And</b></p> <p>24.6“(d) Connectivity granted to a Renewable Power Park developer shall be revoked for the corresponding capacity, if the Connectivity and corresponding GNA has been made effective in terms of Clause (a) of Regulation 22.4 of these regulations and generating station(s) within the Power park fails to achieve COD on or before, “</p>	<b><i>Should be deleted</i></b>	Similar to a Renewable energy implementing agency which acts as a facilitator between renewable energy generators and distribution companies, a Renewable Power Park developer is also responsible for developing a designated area focused on developing amenities required for renewable energy generation projects, providing developers with facilities like infrastructure, and streamlined approvals to facilitate the rapid deployment of clean energy technologies. However, if such restrictions are applied it will severely discourage the RE park developers. Therefore, we humbly request Hon’ble commission to kindly consider deletion of the proposed clause.
5.	Annexure-IV.5. Entities with restricted Access to whom Connectivity has been granted for the same ISTS transmission capacity, either through a separate dedicated transmission system or through sharing of the dedicated transmission system, shall make one of the entities from them a ‘Lead generator’ in terms of Regulation 2.1 (y)(ii) of these regulations or may appoint a QCA in terms of the Clause (11)(a) of Regulation 45 of the Grid Code, on their behalf to coordinate and facilitate scheduling under the provisions of the Grid Code; Provided that if such Applicants appoint a lead generator or QCA, scheduling of the power of an entity covered under Regulation 5.11(a) of these	Annexure-IV.5. Entities with restricted Access to whom Connectivity has been granted for the same ISTS transmission capacity, either through a separate dedicated transmission system or through sharing of the dedicated transmission system, shall make one of the entities from them a ‘Lead generator’ in terms of Regulation 2.1 (y)(ii) of these regulations or may appoint a QCA in terms of the Clause (11)(a) of Regulation 45 of the Grid Code, on their behalf to coordinate and facilitate scheduling under the provisions of the Grid Code; Provided that if such Applicants appoint a lead generator or QCA, scheduling of the power of an entity covered under Regulation 5.11(a) of these	The regulation remains silent about the methodology of schedule of power scheduling of the power of an entity covered under Regulation 5.11(a) during the Solar hours it may lead to disputes in real time. Therefore, we humbly request Hon’ble commission to kindly direct the scheduling authority to formulate the procedure.

	regulations may be permitted during solar hours by such lead generator or QCA;	regulations may be permitted during solar hours by such lead generator or QCA; NLDC should formulate procedure for scheduling of power during Solar hours of an entity covered under regulation 5.11(a) of these regulations.	
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