

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

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Date: Tue, 08 Apr 2025 16:11:51 +0530

Subject: Request for Consideration of Comments on 4th Amendment to GNA & Connectivity Regulation

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Respected Sir,

Greetings from UPC Renewables India Private Limited.

We are writing to respectfully request your consideration of our comments on the 4th Amendment to the General Network Access (GNA) & Connectivity Regulation, specifically regarding the provision that allows Battery Energy Storage System (BESS) enhancement for Renewable Power Parks under Clause 5.2(a).

Clause No.	Draft Amended Regulation	Change suggested	Rationale
<b>Regulation 5.2</b>	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;	Currently, under Regulation 5.2, only generators are permitted to enhance their capacity beyond the existing limits. However, we propose extending this flexibility to Renewable Park developers as well. By providing this option to Renewable Park developers, they would be able to enhance their capacity in line with the growing demand and expansion of renewable energy projects, thereby contributing more effectively to the nation's renewable energy goals. We believe that granting this leverage will not only support the growth of the renewable energy sector but also help in optimizing the utilization of existing transmission infrastructure, ensuring a more sustainable and efficient energy system.	?Power Park developers should be treated at parity with generators in terms of allowing capacity enhancement as well as BESS addition. Currently there is no provision that allows BESS addition in renewables power parks?

We kindly request to consider our comment while reviewing the amendment.

Regards

**Shubham Kothari**

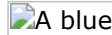
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