

WNEL/2025/CERC/01

03.04.2025

To,

Mr. Harpreet Singh Pruthi,

Hon'ble Secretary

Central Electricity Regulatory Commission,

3rd & 4th Floor, Chaderlok Building,

36, Janpath, New Delhi- 110001

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

Dear Sir,

At the outset we are pleased to convey our regards and appreciation for your endeavors to encourage private sector participation across India through suitable regulatory/policy measures.

We wish to introduce Welspun New Energy Limited (hereafter referred as "WNEL"), a company incorporated under Company Act 1956 and a generating company within the meaning of Section 2(28) of the Electricity Act, 2003 and amendment thereof.

WNEL aims to be a global leader in deploying industry ready robust green energy solutions across India. WNEL actively pursuing large scale green hydrogen/ammonia and renewable projects and is aim to aid India in achieving its green energy targets.

We hereby submit our comments/suggestions as Annexure-1 on aforesaid Draft GNA Regulations as published on the website of Hon'ble CERC for your kind consideration and necessary action.

We sincerely request the Hon'ble Commission to consider these suggestions/comments while finalizing the aforesaid regulations.

We look forward for your support and guidance.

Yours Sincerely,

For Welspun New Energy Limited

(Anand Kumar)

HEAD – Regulatory & Cooperate Affairs

Welspun New Energy Limited

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Annexure-1

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

Sr.No.	Clause No. of Proposed Amended CERC GNA Reg	Suggestions/Observations
1	<p>Clause 2: Amendment to Regulation 2.1 of the Principal Regulations:</p> <p><i>2.3. 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:</i></p> <p>“</p> <p><i>(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;</i></p> <p><i>(ak-ii) “Non-Solar hours” means the time blocks other than ‘Solar hours’ of the same day;</i></p>	<p>It has been observed that as a precautionary measure for combating the issues which may arise due to intermittent electricity injection by various types of renewable generation sources covering Solar/Wind/Hybrid IPPs CERC with 4th amendment to prevailing GNA Regulations, has introduced the concept of ‘Restricted Access’.</p> <p>As per Clause 2.3 (ak-i) & (ak-ii) Solar & non-Solar hours will be defined by NLDC every week for each State of India.</p> <p>In regard to the newly introduced concepts of ‘restricted access’ & Solar/Non-Solar hours we would like to submit following observations/suggestions to Hon’ble CERC:</p> <ol style="list-style-type: none"> 1. Is Solar Hours & Non-Solar Hours which is to be declared by NLDC & corresponding restricted access for injection will also be applicable on existing projects or on projects which has been already granted GNA access in retrospective manner. If such is the case then it will risk the commercial viability of such projects as associated developers has already entered into long term agreements with suitable off-taker’s

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		<p>referring to earlier prevailing regulations where there are no such restrictions w.r.t to Solar & Non-Solar hours.</p> <p>We humbly request Hon'ble CERC to apply the changes as proposed with 4rth amendment to prevailing GNA regulations prospectively i.e. on new projects only which is planned to be commissioned after 18 to 20 months of the issue of these regulations or which applies for in-principal connectivity after 3months of issue of these regulations. Otherwise old projects contracts becomes obsolete.</p> <p>2. If in case renewable projects with restrictions w.r.t Solar or Non-Solar hours injected excess electricity in Non-Solar or Solar hours accidentally then in such case how such injections will be treated, what are the penal charges which may be imposed in such cases. Does such act results in forced outage instructions? We seek clarification on this from Hon'ble Commission.</p> <p>3. We seek clarification from Hon'ble CERC whether there is any restrictions on wind projects on scheduling their injections during solar or non-solar hours if applied for restricted connectivity at terminal bay on sharing basis.</p> <p>4. Does Solar or Non-Solar hours restrictions also applicable on reactive power injections into the GRID? It is to be highlighted that Solar & Wind Plants typically injects reactive power to improve GRID stability and to control voltage fluctuations. We seek clarification on this from Hon'ble Commission.</p> <p>5. Does developers are allowed to commission zero export devices or power controllers of any specifications which may help them in</p>
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		complying with restricted access principle, if not then we request Hon'ble commission to suggest the specifications of prescribed devices which may be commissioned to comply with such restricted access principle.
2	<p>Clause 5: New Regulation 5.11</p> <p><i>"5.11 Entities with Restricted Access</i></p> <p><i>(a) An REGS (with or without ESS) based on Wind source or ESS may seek Connectivity with restricted access (non-solar hours) at a terminal bay of an ISTS substation:</i></p> <p><i>(i) Through a separate dedicated transmission system,</i></p> <p><i>or</i></p> <p><i>(ii) Which is already allocated to another REGS or Renewable Power Park, with restricted access (solar hours),</i></p> <p><i>Example: An REGS (Wind - 400 MW, ESS - 200 MW) may seek Connectivity of 600 MW with restricted access rights, where injection scheduling rights during solar hours shall be Nil and injection scheduling rights during non-solar hours shall be 600 MW.</i></p> <p><i>(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</i></p>	<p>Suggestion-1:</p> <p>It has been observed that Clause 5.11 of 4rth amendment to CERC GNA Regulations defined "Entities with restricted access".</p> <p>Sub-Clause (a) of Clause 5.11 states the conditions of restrictions for REGS (with or without ESS) based on wind sources.</p> <p>In this regard we submit that typically wind power plant generates electricity during morning, evening & night hours, the generation intensity may vary based on locations of generation. It has been observed that during morning and evening hours there are few time blocks in which both solar & wind may generate electricity simultaneously, these time-blocks cannot be strictly categorized as Solar or Non-Solar time blocks. Similar principle is applicable in case of REGS based on Solar or RHGS also.</p> <p>Considering above reasoning we request Hon'ble CERC to direct NLDC to define overlapping hours (or time blocks) in which any wind, solar or ESS developers are allowed to inject scheduled power into the GRID if they are seeking separate restricted connectivity during solar or non-solar hours.</p> <p>Suggestion-2:</p> <p>It has been observed that Clause 5.11 (c) proviso puts restriction on MWs which may be allowed for connectivity during non-solar hours for REGS</p>

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<p>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>....</p> <p>Examples:</p> <p>(i) If an REGS based on a Solar source has been granted Connectivity of 1000 MW, such entity shall have restricted injection scheduling rights for 100 MW in Solar hours and shall have no injection scheduling rights during Non-Solar hours. However, it may draw power during non-solar hours.</p> <p>...</p> <p>(c) REGS (with or without ESS) based on a solar source or an RHGS with a combination of solar source with another source, including ESS seeking Connectivity under Regulation 4.1 of these regulations, shall be considered for grant of Connectivity as an entity with restricted access:</p> <p>Provided further that <u>if the quantum of Connectivity that can be made available for non-solar hours is less than 50 MW</u>, such RES or</p>	<p>(with or without ESS) projects based on solar sources or on RHGS projects which is reproduced as under for reference:</p> <p><u>“Provided further that if the quantum of Connectivity that can be made available for non-solar hours is less than 50 MW</u>, such RES or RHGS shall not be considered for conversion as an entity with restricted access.”</p> <p>In this regard we submit Hon’ble CERC to remove the minimum restriction criteria of 50MW for renewable developers for availing connectivity & GNA access. Because if ‘restricted access’ principle applied on RE projects which are already given GNA access or connectivity then in such case there are high chances that multiple RE developers may be left with stranded capacities (MWs) which in quantum terms are less than 50 MW (say for ex 45 or 35 MWs), for which such developers would have already incurred CAPEX for planning such capacities, if due to restricted access principle whole planned capacities are not allowed for GRID connectivity or for planned GNA access then it will result in huge commercial risks to such projects, and ultimately force such projects to shut down.</p> <p>Considering above reasoning we request Hon’ble CERC to amend above highlighted proviso inline of suggestion as under:</p> <p><u>“Provided further that if the quantum of Connectivity that can be made available for non-solar hours is less than 5 MW</u>, such RES or RHGS shall not be considered for conversion as an entity with restricted access.”</p> <p>Also by reducing the restrictions from 50MW to 5MW will ensure maximum renewable capacity additions with complementary profiles through RHGS or REGS projects.</p>
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	<p><i>RHGS shall not be considered for conversion as an entity with restricted access.</i></p> <p><i>....”</i></p>	<p>Suggestion-3:</p> <p>Clause 5.11 (b) example (i). Annexure-IV point 1(b) and Annexure-IV point 2(b) confirms that any REGS may be allowed to draw injected power from the GRID throughout the day subject to transmission constraints.</p> <p>In this regard we would like to highlight that typically during non-generation hours renewable projects rely upon banking facility. Banked renewable power they plan to draw during non-generation hours, in case of solar it is done during non-solar hours and in case of wind it is done during non-windy hours typically.</p> <p>If proposed ‘restricted access’ principle levied on renewable developers then in such case all excess renewable electricity will be banked with local DISCOM with intension to draw back the same whenever required to offset the electricity requirements of associated off-takers.</p> <p>However as practised by most states in India there is restriction on electricity quantum which may be banked w.r.t generated RE power (around 20-30% of generated power) or w.r.t power consumed from local DISCOM (around 20-30% of power consumed) with the DISCOM, such restrictions will result in major loss of excess power generated by renewable developers.</p> <p>Considering above reasoning we request Hon’ble CERC that if ‘restricted access’ principle are proposed to be levied on all renewable projects, then in such case restrictions on renewable electricity quantum which may be banked with local DISCOM may be removed or may be relaxed to reasonable level (say up to 40-50%), this will help RE developers to utilize their planned capacities optimally in efficient manner.</p>
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		Restricting renewable developers to inject power during Solar or Non-Solar hours and at the same time putting restrictions on renewable developers on excess power which may be banked with local DISCOM, will act as double faced sword which results in underutilization of their planned RE capacities with ensured commercial loss.
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