

# Comments and Suggestions on Draft 4<sup>th</sup> Amendment in CGNA Regulations

Reference No- Public Notice No. L-1/250/2019/CERC dated 3<sup>rd</sup> March 2025

Apraava Energy Private Limited

Date of Public Hearing: 9<sup>th</sup> April 2025



# Comments/Suggestions on Draft 4th Amendment in CGNA Regulations

## Connectivity BG for Additional Generation Capacity (Regulation 5.2a(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;

## Our Submission:

Modified Clause:

**5.2a (a) No Additional** 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;

Provided that if the existing grantee is not seeking non-solar hour connectivity, then the proportionate Conn-BG should be returned to the existing grantee

## Rationale:

Enhanced capacity to be allowed within the existing Connectivity.

If the existing grantee is not seeking connectivity during non-solar hour then the proportionate Conn-BG should be returned to the existing grantee.



# Comments/Suggestions on Draft 4th Amendment in CGNA Regulations

## Timeline for commissioning the Additional Generation Capacity (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;

## Our Submission:

24 months of commissioning timeline for additional capacity may be allowed.

**Rationale:** Similar to new project 24 months of time should be allowed so that developers can get sufficient time to execute the project. Shorter time may attract penalties for delay.



# Comments/Suggestions on Draft 4th Amendment in CGNA Regulations

**Treatment of connectivity quantum made available for non-solar hours is less than 50 MW (2nd Proviso of Reg 5.11(b)):**

## **Proposed proviso**

Provided further that if the quantum of Connectivity that can be made available for non-solar hours is less than 50 MW, such RES or RHGS shall not be considered for conversion as an entity with restricted access.

**Our submission:** 2<sup>nd</sup> Proviso of Regulation 5.11(b) may be deleted.

## **➤ Rationale:**

Any connectivity left in the system should be aggregated and can be allotted to applicant of connectivity for the better utilization of transmission network.



# Comments/Suggestions on Draft 4th Amendment in CGNA Regulations

## Changes in Shareholding Pattern (2nd 11A(6)):

### Proposed Regulation

11A(6)(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.

### Our submission:

11A(6)(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 **cumulative** shareholding pattern **shall not fall below 50%**~~be maintained and cannot be changed~~ upto COD of the project.

### ➤ Rationale:

Similar to sub clause (a) of clause 6 of Regulation 11 A this should also be allowed in case of multiple promoters. Further, similar provision has been allowed for the successful bidder (in case project is being executed through SPVs) in the SECI projects.

Further Regulation 11 A(6) should not be implemented in a retrospective basis mainly for the case where shareholding pattern has already got changed before commissioning



# Thank You