========== Forwarded message ==========
From: Vikram Singh <vikrams@evrenenergy.com>
To: "secy@cercind.gov.in"<secy@cercind.gov.in>,
"shilpa@cercind.gov.in"<shilpa@cercind.gov.in>
Cc: "Rahula Kashyapa"<rkashyapa@evrenenergy.com>, "Prashant
Kanaujia"<pkanaujia@evrenenergy.com>
Date: Mon, 19 Oct 2026 10:29:27 +0530
Subject: EVREN's Comments and Suggestions on Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026
========== Forwarded message ==========

Dear Sir/Madam,

Greetings from Evren.

We are a renewable energy development platform launched by Brookfield in India, with a portfolio of over 11 GW, including approximately 7 GW of solar, wind, and battery energy storage projects which are in advanced stages of implementation. At the outset, we sincerely appreciate the efforts of the Hon'ble Commission in developing a progressive and enabling regulatory framework for the power sector and in promoting the efficient integration of renewable energy into the grid.

With reference to the Public Notice inviting comments, suggestions, and objections on the Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026, please find attached our comments and suggestions for kind consideration of the Hon’ble Commission.

We respectfully request the Hon'ble Commission to consider the enclosed submissions while finalizing the proposed amendments.

Regards,
Vikram Singh
BD & Regulatory | Evren
Equinox Business Park, Tower 3
LBS Marg, Kurla (West), Mumbai – 400070
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Date **16-10-2026**

EVREN's comments on Central Electricity Regulatory Commission(Indian Electricity Grid Code) (Second Amendment) Regulations, 2026.

S.no	Clause	Comments/Suggestions
1	*New sub-clause (j) added after sub-clause (i) of Clause (3) of Regulation 22 of the Principal Regulations* *"(j) it is not possible to demonstrate the rated capacity of the plant within one year from the date of COD due to transmission constraints, such plant may demonstrate the rated capacity of the plant within one year from the date of effectiveness of the GNA or one year from the date of COD, whichever is later."*	In addition to the given clause the following should also be considered. *Increase the period available for demonstration of rated capacity, presently permitted within one year from the date of effectiveness of GNA or one year from the date of COD, whichever is later, by empowering the Grid Operator to grant an extension of up to six months on a case-by-case basis in the event of force majeure or other circumstances beyond the control of the generator.*
2	Clause (3) of Regulation 22 of the Principal Regulations	*De-rating provision should not be applicable in case the project is unable to demonstrate active power injection (equivalent to installed capacity) solely due to transmission line losses. The project should be permitted to declare COD for the sum of installed rated capacity of generating equipment.*