Ref. No: JGEL/CERC/BD/2026-27/03 **Date: 28-10-2026**

To,
The Secretary,
Central Electricity Regulatory Commission,
6th, 7th & 8th Floor, Tower B, World Trade Centre,
Nauroji Nagar, New Delhi-110 029

Subject: Submission of additional comments / suggestions on the Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026

References:

1. CERC public notice no. L-1/265/2022/CERC dated 21.09.2026 inviting comments on the Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026.
2. JGEL letter Ref. No. JGEL/CERC/BD/2026-27/02 dated 21.10.2026 submitting comments / suggestions on the Draft Regulations.
3. CERC public notice no. L-1/265/2022/CERC dated 22.10.2026 extending the last date for submission of comments to 02.11.2026.
4. JGEL representation Ref. No. JGEL/CERC/BD/2026-27/03 dated 29.07.2026 requesting permission for trial run of wind projects for capacity less than 50 MW based on Buyer's / DISCOM's consent, without the requirement of formal PPA amendment.
5. Ministry of Power letter F.No. 48-6/16/2024-NRE-Part(1) dated 01.10.2026 addressed to the Hon'ble Commission on the same subject.

Dear Sir,

We, **Juniper Green Energy Limited** (formerly Juniper Green Energy Private Limited), a renewable energy platform of **AT Capital Group**, wish to introduce ourselves as a developer and operator of solar, wind, and hybrid renewable energy assets.

Juniper Green Energy Ltd ("**JGEL**") is a renewable energy developer and operator with approximately **2.9 GW of RE and 600 MWh of operational BESS projects, ~3.5 GW under construction, and more than 4 GW under development**. The Group also has a strong track record, including development of Orange Renewable, a 1 GW platform in India. Since our establishment in October 2018 and headquarters in NCR, we have focused on supporting India's clean energy transition through timely execution of renewable projects.

This is in furtherance of our letter dated 21.10.2026 (Reference no 2), vide which JGEL submitted its clause-wise comments / suggestions on the Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026 ("Draft Second Amendment"), published vide public notice dated 21.09.2026 (Reference no 1).

We thank the Hon'ble Commission for extending the last date for submission of comments / suggestions / objections to 02.11.2026 vide public notice dated 22.10.2026 (Reference no 3). Availing this opportunity, JGEL respectfully submits its additional comments on the Draft Second Amendment. These may kindly be read together with Annexure-A of our letter dated 21.10.2026, which JGEL continues to rely upon.

A. JGEL's representation dated 29.07.2026:

JGEL had, vide its representation dated 29.07.2026 (Reference no 4), requested the Hon'ble Commission to clarify / amend proviso (i) to Regulation 22(3) of the CERC (Indian Electricity Grid Code) Regulations, 2023 ("Grid Code"). The request was that the written consent of the buying entity / procurer to off-take a specified capacity lower than 50 MW may, by itself, be treated as sufficient compliance with the requirement that the "Power Purchase Agreement provides for a specific capacity", without requiring a formal amendment of the PPA.

The rationale and justification set out in that representation (copy enclosed as **Annexure-1**) are reiterated and may kindly be treated as part of this submission. In brief:

1. **Regulatory position:** Regulation 22(3)(c) of the Grid Code mandates a minimum block of 50 MW for the first trial run of a wind generating station. In a recent order, the Hon'ble Commission held that where the PPA specified 50 MW as the minimum threshold for the first part, the buying entity's (UP DISCOM's) written consent to off-take a lower capacity was not sufficient, and a formal amendment to the PPA was required.

2. **Practical difficulty:** Completion of the first 50 MW block is frequently delayed by factors beyond the developer's control, most notably Right-of-Way (RoW) issues affecting the 33 kV evacuation infrastructure connecting dispersed WTG locations to the Pooling Sub-Station. A substantial part of the block (e.g. 20–25 MW) may be ready for trial run while only the balance is held up.

3. **PPA amendment route is ineffective:** A PPA amendment requires approval of the relevant SERC / CERC and typically takes a minimum of 3–4 months. Proviso (i) therefore does not serve its intended purpose in such cases.

4. **Benefit to the buying utility:** Wind power under PPAs is typically scheduled at about Rs. 3–4/unit, whereas peak and shortage requirements are otherwise met through short-term / exchange purchases at around Rs. 10/unit. Early off-take of commissioned wind capacity therefore benefits the buying utility and its consumers.

B. Recommendation of the Ministry of Power:

Subsequently, the Ministry of Power ("MoP"), vide its letter dated 01.10.2026 (Reference no 5), forwarded to the Hon'ble Commission the representation of NSEFI dated 31.07.2026 on the same issue. Having examined the matter, MoP observed that:

> *"…to facilitate faster capacity addition and utilization of the capacity ready to generate electricity, particularly from wind projects, the suggestion for permitting trial runs based on the written consent of the buyer/DISCOM, in lieu of a formal amendment to the PPA, may be considered for wind projects of capacity, say minimum 25 MW. Such a threshold may also ensure easing the procedural requirements at CTU/Grid-India."*

MoP has accordingly requested the Hon'ble Commission to consider incorporating suitable regulatory provisions / providing clarifications for permitting trial run of wind projects for capacity less than 50 MW

based on the Buyer's / DISCOM's consent. A copy of the MoP letter is enclosed as **Annexure-2** for ready reference.

C. <u>Need to address the issue in the present amendment:</u>

The MoP letter was issued after the Draft Second Amendment was published on 21.09.2026, and the Draft, as published, does not propose any amendment to Regulation 22(3)(c) or proviso (i) to Regulation 22(3) on this aspect. JGEL respectfully submits that the present consultation, with its extended timeline, offers the most appropriate and timely opportunity to give effect to the MoP's recommendation and industry requirement, without the need for a separate amendment exercise.

D. <u>Request:</u>

In view of the above, JGEL respectfully requests the Hon'ble Commission to consider reducing the minimum capacity for the trial run of wind turbine(s) from 50 MW to 25 MW, as proposed at Sr. No. 1 of Annexure-A to our letter dated 21.10.2026, and to kindly consider these additional comments along with our earlier comments dated 21.10.2026 while finalising the CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026.

Submitted for your kind consideration.

Thanking you,

Yours faithfully,
For Juniper Green Energy Limited

PAVAN KUMAR GUPTA
Digitally signed by PAVAN KUMAR GUPTA
Date: 2026.10.28 19:02:08 +05'30'

Pavan Kumar Gupta
Authorized Signatory

Encl: As above