Ref. No: JGEL/CERC/BD/2026-27/02 **Date: 21-10-2026**

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

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 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.

With reference to the **CERC Draft Notification No. L-1/265/2022/CERC dated 21.09.2026** inviting comments/suggestions on the **Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026**, we have examined the draft Regulations and wish to thank the Hon'ble Commission for the opportunity to submit our comments/suggestions. Our detailed clause-wise comments are enclosed herewith as **Annexure-A.**

We request the Hon'ble Commission to kindly consider our comments/suggestions 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

Juniper Green Energy Limited

Pavan Kumar Gupta
Authorized Signatory

Encl: As above

Annexure-A

Juniper's Suggestions on Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026

Sr. No.	Page No and Regulations	Existing Clause as per Draft	Juniper's Proposed Suggestions	Rationale
1	Page no 50 of the Principal Regulation	**Sub-clause (c) of Clause (3) of Regulation 22 of the Principal Regulations:** Trial run of a wind turbine(s) shall be performed for a minimum capacity aggregating to 50 MW: Provided that in the case of a project having a capacity of more than 50 MW, the trial run for wind turbine(s) above the capacity of 50 MW shall be performed in batch sizes of not less than 5 MW: Provided further that the trial run for wind turbine(s) aggregating to less than 50 MW for entities covered under clause (e) of Regulation 4.1 of the GNA Regulations, shall be allowed for the capacity for which Connectivity has been granted to such an entity	Trial run of a wind turbine(s) shall be performed for a minimum capacity aggregating to **25 MW**: Provided that in the case of a project having a capacity of more than **25 MW**, the trial run for wind turbine(s) above the capacity of **25 MW** shall be performed in batch sizes of not less than 5 MW: Provided further that the trial run for wind turbine(s) aggregating to less than **25 MW** for entities covered under clause (e) of Regulation 4.1 of the GNA Regulations, shall be allowed for the capacity for which Connectivity has been granted to such an entity.**:**	**1. Practical challenges:** WTGs (3 to 5 MW each) are installed one by one across dispersed sites, with frequent delays due to land, RoW, crane and logistics constraints. Waiting for 50 MW keeps completed turbines idle for months, causing generation loss, higher project cost and SCOD penalties. **2. MoP recommendation:** MoP have also recommended permitting trial run of wind projects below 50 MW (minimum 25 MW) based on the buyer's / DISCOM's consent, without a formal PPA amendment **3. No impact on grid security:** All requirements of Regulation 22(3)(d) continue to apply; 5 MW batches are already permitted beyond the first batch. **4. Buyer's consent suffices:** PPA amendments involve multiple parties and take months; the buyer's written consent adequately protects its interest.
2	Page no 3 of the Draft Regulations (2nd	**Four provisos shall be added in sub-Clause (e) of Clause (3) of Regulation 22 of the Principal Regulations:**	**Provided that the trial run of a ESS may be conducted in a single instalment or multiple instalments, with each instalment**	BESS are at a nascent stage of development and deployment in India, and enabling their timely integration into the power system is essential to meet the

Sr. No.	Page No and Regulations	Existing Clause as per Draft	Juniper's Proposed Suggestions	Rationale
	amendment)	"Provided that the trial run of a standalone ESS shall be performed for a minimum capacity aggregating to 50 MW: Provided further that in the case of a standalone ESS having a capacity of more than 50 MW and less than 250 MW, the trial run for the balance capacity shall be performed in a maximum of three instalments with a minimum capacity of 5 MW: Provided also that the trial run for a standalone ESS aggregating to less than 50 MW covered under clause (e) or clause(f) of Regulation 4.1 or Regulation 4.4 of the GNA Regulations, shall be allowed for the capacity for which Connectivity has been granted to such an entity: Provided also that in the case of a project having a capacity of 250 MW or more, the trial run may be performed in instalments, with a minimum capacity of 50 MW without any limit on the number of instalments."	**having a minimum capacity of 25 MW, up to the total capacity of the ESS.** **Provided further that the final instalment of the trial run may be conducted for the remaining balance capacity, even where such capacity is less than 25 MW, to enable completion of the trial run for the entire capacity of the ESS.** Provided also that the trial run for a standalone ESS having a capacity of less than 50 MW, covered under clause (e) or clause (f) of Regulation 4.1 or Regulation 4.4 of the GNA Regulations, shall be permitted for the capacity for which Connectivity has been granted to such entity."	country's growing electricity demand, particularly during peak-demand periods. BESS offers a dispatchable energy solution that can store electricity during periods of surplus availability and discharge it during periods of high demand, thereby supporting peak-load management, grid flexibility and reliability. We propose that the minimum capacity for conducting a trial run should be reduced from 50 MW to 25 MW to facilitate the phased commissioning of ESS projects. ESS projects typically comprise multiple DC containers, PCS and associated electrical infrastructure, which may be commissioned in phases depending on equipment availability, site readiness, testing requirements and grid connectivity arrangements. The proposed reduction would provide greater operational flexibility, enable the progressive commissioning and faster operationalization of available capacity, and avoid delays in the declaration of commercial operation solely due to the minimum trial-run threshold. This would improve the utilization of available energy storage infrastructure and facilitate the timely availability of ESS

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				capacity to support grid operations and renewable energy integration, without compromising grid security or reliability.
3	Page no 1 of the First Amendment	**Sub-Clause (c) of Clause (2) of Regulation 19 of the Principal Regulations:** Injection of infirm power shall not exceed 45 (forty-five) days from the date of firsttime energization and integration (FTC) approval for REGS and ESS (except Hydro PSP ESS).	Injection of infirm power shall not exceed 45 (forty-five) days from the date of first-time energization and integration (FTC) ~~approval~~ for REGS and ESS (except Hydro PSP ESS).	There have been instances where First Time Charging (FTC) approval was obtained, but the developer subsequently faced severe Right of Way (RoW) issues, delaying the actual FTC with the Grid. However, the 45-day period is calculated from the date of FTC approval. It may be noted that the interchange of power begins from the date of first time charging with the Grid, not from the date of approval. It is therefore suggested that the 45-day period be calculated from the date of actual FTC. This would avoid multiple requests to the RLDC and the filing of petitions before the CERC seeking extension of FTC validity for the interchange of power.
4	Page no 7 of the Draft Regulations (2nd amendment)	**Sub-clause (e)(i) of Clause (1) of Regulation 27 of the Principal Regulations:** Provided that in case the contract entered into by such generating station or ESS provides conditions other than provided for in these regulations , as prerequisite for achieving commercial operation of such generating station or ESS , the entity shall meet those conditions in terms of the	Requesting for the clarification that the generator shall be eligible for declaration of COD after undergoing the successful Trial run. **For example**: In case the Trial Run is conducted on 18.10.2026 during 14:00 to 18:00 hours and RLDC issues the letter for successful trial run on 20.10.2026. Whether the developer be eligible for declaration of COD from 18:01 hours of 18.10.2026, even	Request for clarification whether the COD to be declared after the date of issuance of TRC approval or after undergoing the successful trial run.

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		contract prior to power supply under such contract, however such generating station or ESS shall declare commercial operation for the purpose of these regulations after successful trial run in terms of these Regulations	though the scheduling may be done after 20.10.2026 after contract mappings in the RLDC system.	
5	Page no 2 of the Draft Regulations (2nd amendment)	**Amendment to Regulation 21 of the Principal Regulations:** The word and number "seven (7)" shall be substituted with the word and number "three (3)" in Clause (1) of Regulation 21 of the Principal Regulations	No change.	We thank the Hon'ble Commission for this amendment. This was much needed for the industry.