Date: 03.04.2025

Ref: AESPL/CEA/01/04

To,

The Secretary
Central Electricity Regulatory Commission
7th Floor, World Trade Centre,
Tower B, Naurojinagar, New Delhi-110029

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

Respected Sir,

This is with reference to draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025, issued by Hon'ble Central Electricity Regulatory Commission (CERC) for inviting suggestions/ comments from stakeholders and public at large.

Amplus Solar is Asia's leading distributed energy company providing low-carbon clean energy solutions to commercial and industrial customers by setting up on-site solar projects (rooftop and ground-mounted) and off-site solar farms. Amplus Solar has also diversified into new avenues such as battery storage, residential solar, and electric vehicle-based logistics solutions.

Amplus Solar owns and manages a portfolio of around 2 GW of distributed solar assets and serves 250+ renowned Indian and multinational firms like Yamaha, Cisco, Amazon, Walmart, Reckitt Benckiser, Schlumberger, Carlsberg, ABB, TVs, Schneider, Qualcomm, Halliburton, GE, Honda among others, tripling its customer base from 2017 to 2023.

Amplus Solar's operational plants are expected to cumulatively generate 22 billion units of electricity over their lifetime. The carbon dioxide abatement over the lifetime of these projects amounts to 21 million metric Tonnes and the environmental impact can also be equated to 24 million mature trees absorbing carbon dioxide for 40 years.

Amplus Solar is a member of the Petroleum Nasional Berhad (PETRONAS) group, Malaysia and is headquartered in Gurugram, India with regional offices in Bangalore, Mumbai, Pune, Bangkok, Dubai, and Kuala Lumpur. PETRONAS recently established Gentari Sdn Bhd (GENTARI) to independently pursue and deliver integrated sustainable energy solutions, and to capture opportunities in the energy transition. GENTARI offers lower carbon solutions through three initial core pillars – Renewable Energy, Hydrogen and Green Mobility, forming a portfolio of solutions cutting across the electron value chain to help customers achieve net zero emissions.

We are submitting our comments under Annexure 1 for the Hon'ble CERC's kind consideration.

Thanking you,

For Amplus Energy Solutions Private Limited

Amplus Energy Solutions Private Limited

Nitesh

Nitesh Tyagi
AGM - Regulatory
Phone No.: 8979425587
Email Id: nitesh.tyagi@amplussolar.com

Annexure-1

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

S. No.	Clause No.	Proposed Provision in Draft Regulations	Comments
1.	Regulation 2.1 (ak-i) &(ak-ii)	**(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;** (ak-ii) "Non-Solar hours" means the time blocks other than 'Solar hours' of the same day;	With respect to the declaration of Solar Hours by NLDC, we respectfully submit that the framework for defining these hours must ensure that there is no generation loss for existing solar projects. Specifically, for projects whose grid access may be restricted to the declared solar hours, it is critical to establish a methodology that does not adversely impact their energy generation and financial viability. **Key Considerations:** **1. Variation in Insolation Levels** The level of solar insolation varies across different locations and projects. A uniform definition of solar hours, if not carefully designed, may not accurately reflect the actual generation potential at different sites. **2. Diversity in Technology** Solar projects utilize diverse technologies—some plants are equipped with solar trackers, which enable generation even at lower insolation levels. A rigid definition of solar hours that does not account for such advancements could lead to unnecessary generation restrictions. **3. Limitation of Fixed 8-Hour Solar Window**

Amplus Energy Solutions Private Limited.

S. No.	Clause No.	Proposed Provision in Draft Regulations	Comments
			It is important to highlight that the definition of Solar Hours under the Electricity (Rights of Consumers) Amendment Rules, 2023, which specifies an 8-hour duration, **should not be considered as a benchmark** for the declaration of solar hours by NLDC. Solar generation hours often extend beyond this fixed window, depending on geographical and seasonal variations. Restricting Solar Hours to a predefined 8-hour period could lead to avoidable generation losses. **4. Impact on Project Viability** Any loss of generation, even as low as 1%, directly affects the return on investment (ROI) of solar plants, which already operate on thin margins due to competitive tariffs. Therefore, restricting grid access without due consideration of site-specific factors could lead to financial strain on developers. **Request for Consideration:** • The methodology for determining solar hours should incorporate project-specific factors, such as geographical location and technology type, to prevent unnecessary curtailment. • A transparent consultative mechanism should be established, allowing stakeholders to provide input before finalizing the solar hours for different regions. • NLDC should ensure that solar hours are declared with flexibility, allowing adjustments based on real-time generation patterns and seasonal variations.

Amplus Energy Solutions Private Limited.

S. No.	Clause No.	Proposed Provision in Draft Regulations	Comments
			• The fixed 8-hour definition under the *Electricity (Rights of Consumers) Amendment Rules, 2023* should not be applied to the declaration of solar hours, as this does not reflect the actual solar generation potential at different sites. We request the Hon'ble Commission to provide clear guidelines on the declaration of solar hours, ensuring that the regulatory framework supports optimal utilization of solar energy without unintended generation losses.
2	Regulation 5.2(a)(c)	5.2 a The additional generation capacity under Regulation 5.2 of these regulations shall be subject to the following conditions: ..... (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;**	It is requested to the Hon'ble Commission to extend the schedule date of commercial operation to 24 months from the date of approval or date of firm connectivity date, whichever is later.
3	1st Proviso to Regulation 5.11(b)	5.11(b) .... 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	We request the Hon'ble Commission to grant a one year period for existing entities to submit applications under Regulation 5.2 or 5.11(a). This timeframe is essential to conduct due diligence on land availability and other relevant factors.

Amplus Energy Solutions Private Limited

S. No.	Clause No.	Proposed Provision in Draft Regulations	Comments
		or Regulation 5.11(a) of these regulations, **within a period of three months from effectiveness of this Regulation:**	
4	**Annexure-IV** Clause 1(g)(ii)	**Annexure-IV** 1(g)(ii) An entity covered under Regulation 5.11 (a) of these regulations shall be responsible for the implementation of any **modification in the dedicated transmission system and for compliance with the Grid Code and other regulations** of the Central Commission, at its own cost.	We request the Hon'ble Commission to clarify that any modification in Dedicated Transmission System including Dedicated transmission line, sub pooling substation, Pooling substation and installation to any equipment's to comply grid code or any other code be responsibility of entity under Regulation 5.11(a).
5	**Annexure-IV** Clause 1(h)	**Annexure-IV** 1(h) Connectivity Bank Guarantee: For cases covered under Clause (1)(e) of this Annexure, Connectivity Bank Guarantee viz Conn-BG2 and Conn-BG3, as the case may be, already furnished by an entity under Regulation 5.11(b) or 5.11(c) **shall be shared on prorate basis** between the entity under Regulation 5.11(b) or 5.11(c) and entity covered under Regulation 5.11 (a) of these regulations. Conn-BG1, as per Regulation 8 of these regulations shall be submitted separately by each entity.	We request the Hon'ble Commission to clarify the mechanism for the proposed sharing, considering that Conn-BG2 and Conn-BG3 are returned to existing developers in five equal instalments over five years. The return process of BG's is linked to the generation capacity declared under commercial operation or the effective date of GNA, whichever is later, which would be different for the entity under 5.11(a).

Amplus Energy Solutions Private Limited