

Ref: CERC/Comments/Draft GNA Regulation/01

Date: 03-04-2025

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

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

Ref:- CERC notification No. L-1/261/2021/CERC dated 03-03-2025

Dear Sir,

Blupine Energy private Ltd (www.blupineenergy.com) is the third cleantech platform of ACTIS (<https://www.act.is>), a UK based global investment firm focused on the private equity, energy, infrastructure, and real estate asset classes. ACTIS' energy infrastructure team has invested in over 70 renewable energy projects worldwide, to date generating approximately 11GW of power globally. This makes ACTIS one of the world's largest owner-operator of renewable power assets. In India, ACTIS has already developed their first and second platforms Ostro and Sprng energy successfully (over 3 GW renewable capacity) and has a proven track record of executing and commissioning renewable projects over the last 10 years.

This is in context of the CERC notification dated 03-03-2025, wherein CERC has sought comments on the Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations,2025.

We hereby submit our Comments on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations,2025 as Annexure 1 for kind consideration of the Hon'ble Commission.

Thanking You

For Blupine Energy Pvt Ltd



Authorised Signatory

Enclosures:

Annexure 1: Blupine comments on the Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System)) (Fourth Amendment) Regulations,2025



Annexure 1

S.No	Clause	Provision in Draft	Comments/Suggestions	Explanation
1	5.2 a (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;”	Existing grantees should not be required to submit additional BGs.	<p>CONN BGs linked with connectivity quantum should not be prescribed for capacity enhancement under 5.2, since the injection quantum under Regulation 5.2 does not exceed the connectivity already granted, for which the relevant CONN BGs have been already submitted by the connectivity grantee.</p> <p>Further, this is also in contradiction to the requirement of sharing of CONN BGs prescribed for connectivity applications being made under Regulation 5.11. Under this clause, the CONN BGs will be shared proportionately between the connectivity grantees having connectivity for solar and non-solar hours, In case of shared transmission system/pooling station.</p> <p>As per Annexure IV, under Clause 1 (h) i.e cases covered Clause 1(e) the Bank guarantees submitted by entity under Regulation 5.11(b) or 5.11(c) has to be shared with an entity which applies connectivity under Regulation 5.11 (a).</p> <p>Through above, if additional generation capacity is installed for usage during non-solar hours under Regulation 5.2 by an existing grantee, additional BGs are required to be submitted under 5.2 a (a).</p> <p>However, if the same grantee seeks night hour connectivity</p>

				under Regulation 5.11 (a) the already submitted BG are required to be shared.
2.	5.2 a (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;”	<p>Projects commissioning timelines should be revised to at least 24 months from approval date by the Nodal Agency or from the effective date of GNA, whichever is later.</p> <p>Further, in case of conversion of land based connectivity to LOA based connectivity, the SCOD date should be aligned with the SCOD under such LOA/PPA</p>	<p>The prevailing norm for completion of RE project under the competitive bidding guidelines is 24 months from the relevant effective date under the PPA .</p> <p>Further, Project commissioning is linked to securing a PPA under relevant tenders, which can take time. Extending the timeline ensures practical implementation.</p> <p>For existing connectivity grantees having start date of connectivity in future, the SCOD timelines for additional capacity applied under Regulation 5.2 should be aligned with start date of GNA.</p> <p>Also, it appears that the start date of connectivity would remain unchanged in cases involving conversion from land based connectivity to LOA based connectivity. We request that in such cases maximum timeline for completion of such project must be aligned with the SCOD as provided under such LOA/PPA.</p>
3.	5.2 a (e)	“The entity which has already made an application or has been granted approval by the Nodal Agency under Regulation 5.2 of these Regulations prior to the date of effectiveness of these amendments, shall furnish the scheduled date of commercial operation for such additional capacity, within a period of two weeks from effectiveness of these regulations:	<p>At least three months (from effective date of these Regulations) should be provided to existing connectivity grantees to inform SCOD for application under 5.2.</p> <p>Projects commissioning timelines should be revised to at least 24 months from approval date by the Nodal Agency.</p>	<p>Two weeks timelines appears to be to short for existing applicants under Regulation 5.2. At least 3 months should be provided to such connectivity grantees to plan their project execution timelines.</p> <p>Kindly refer S.No 2 explanation for justification for increasing SCOD timelines to 24 months.</p> <p>Kindly refer explanation against S.No 1 for justification of</p>



		<p>Provided that, in case such additional generation capacity is REGS (with or without ESS) or ESS (other than PSP), the scheduled date of commercial operation for such additional capacity shall not be later than 18 months from the date of effectiveness of these amendments or date of approval by the Nodal Agency, whichever is later.</p> <p>Provided also that such additional generation capacity shall also comply with Clauses (a) to (d) of this Regulation, within a period of one month from the date of effectiveness of this Regulation, failing which approval for such additional generation capacity shall be revoked.”</p>	<p>In case of conversion of land based connectivity to LOA based connectivity, the SCOD date should be aligned with the SCOD under such LOA/PPA</p> <p>Applications under 5.2 should be exempted from BG requirement.</p> <p>The timelines to comply with clauses (a) to (d) of these Regulations, should be revised to at least 6 months.</p>	<p>exemption of BGs for application under Regulation 5.2.</p> <p>The timelines to submit documents under clause 5.2 a (d) i.e which requires documents to be submitted as per Regulation 5.2 (xi) within one month should be increased.</p> <p>It is pertinent to note that producing land documents in one month time frame is not feasible. Accordingly, the time lines should be revised to a minimum of 6 months to comply with clause (d) of the proposed Regulation.</p>
4.	5.11 (b)	<p>“The In principle or final grant of Connectivity intimated to an REGS (with or without ESS) based on solar source or an RHGS with a combination of solar source with another source including ESS (including cases where GNA is effective) shall be converted as an entity with restricted access (corresponding to non-solar capacity during non-solar hours) within a period of one week after the expiry of three months from date of effectiveness of this Regulation:</p> <p>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 or Regulation 5.11(a) of these regulations, within</p>	<p>At least 10-12 months period should be provided to existing connectivity holders to firm up project capacity by participating in relevant tenders for offtake during non-solar hours.</p>	<p>The three-month timeline provided to existing grantees for submitting applications to secure non-solar hour connectivity appears to be to short and onerous. The development of such project is primarily dependent upon issuance of such tenders by REIA for supply of power during non-solar hours. Currently there is no visibility on upcoming tenders having such requirements.</p> <p>Further, since this is a new concept, the offtake of power from C&I consumers for such a project, which supplies power during non-solar hours, is expected to take time.</p>



		a period of three months from effectiveness of this Regulation:		
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