



सेंट्रल ट्रांसमिशन यूटिलिटी ऑफ इंडिया लिमिटेड

(पावर ग्रिड कॉर्पोरेशन ऑफ इंडिया लिमिटेड के स्वामित्व में)

(भारत सरकार का उद्यम)

CENTRAL TRANSMISSION UTILITY OF INDIA LTD.

(A wholly owned subsidiary of Power Grid Corporation of India Limited)

(A Government of India Enterprise)

Ref: CTU/GNA/4th amend/

Date: 03.04.2025

To

Secretary,

Central Electricity Regulatory Commission (CERC)

3rd & 4th Floor, Chanderlok Bhawan,

36, Janpath, New Delhi-110001

Sub: Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025: Submission of comments/suggestions-Reg.

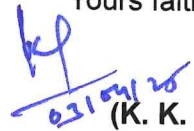
Sir,

CERC vide notification No. L-1/261/2021/CERC dated 03.03.2025 has issued draft notification for Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025 for stake holders' suggestions/comments.

In this regard, please find enclosed CTUIL's Comments/suggestions on proposed Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025 for consideration of Hon'ble commission.

Thanking you,

Yours faithfully,



(K. K. Jain)

Sr. GM (Legal& Reg.), CTUIL

Encl: CTUIL's Comments on subject amendment.

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

Sl. No.	Clause No	Clause as per existing regulation	Changes proposed in draft Amendment	CTUIL proposed changes	Remarks
1	2.1	New	“(q-i)” Entities with Restricted Access” means REGS or ESS whose injection scheduling rights are restricted for solar hours or non-solar hours in accordance with Regulation 5.11 and Annexure-IV of these regulations;”	“(q-i)” Entities with Restricted Access” means REGS or ESS whose injection scheduling rights are restricted for solar hours, non-peak solar hours or non-solar hours in accordance with Regulation 5.11 and Annexure-IV of these regulations;”	Non-Peak solar hours need to be defined for restricted access of injection of power in case of standalone ESS.
2	2.1	New	“(ai-i)” Restricted Access” means restricted scheduling rights for solar hours or non-solar hours of the day for entities covered under Regulation 5.11 of these Regulations;”	“(ai-i)” Restricted Access” means restricted scheduling rights for solar hours, non-peak solar hours or non-solar hours of the day for entities covered under Regulation 5.11 of these Regulations;”	
3	2.1	New	(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 everyweek 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;	(ak-i) “Peak 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-Peak-Solar hours ” means thetime blocks of the day other than peak solar hours 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;	Modified “Solar Hours” as “Peak Solar Hours” as the same is not defined whereas “Solar Hours” definition not required with this consideration.

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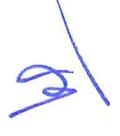
				(ak-ii) 'Non-Solar hours' means the time blocks other than 'Solar hours' or 'Peak-Solar hours' of the same day;	
4	5.2a	New	The additional generation capacity under Regulation 5.2 of these regulations shall be subject to the following conditions: (a) Connectivity Bank Guarantee Conn-BG1 and Conn-BG3 under Regulation 8 of these regulations shall be furnished by the existing grantee for such additional generation capacity; (b) The existing grantee shall intimate the scheduled date of commercial operation for such additional capacity;	The additional generation capacity under Regulation 5.2 of these regulations shall be subject to the following conditions: (a1) Applicant shall submit application fees of Rs 5 lakhs along with applicable taxes for each application for addition of generation capacity. (a2) 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; (b) The existing grantee shall intimate the scheduled date of commercial operation for such additional capacity;	At present application fee is not taken for application under 5.2.
5	5.2a	New	(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	(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 21 months from date of	SCOD has to be provided by the applicant at the time of application. accordingly, 21 months is proposed considering 03 months of application processing time.

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			be later than 18 months from date of approval by the Nodal Agency; (d) The applicant shall furnish documents required under Regulation 5.8.(xi) of these Regulations, as applicable, for such additional capacity, and shall also be subject to other Regulations including Regulation 11A, 11B, 24, 24.6 of these Regulations.	application. approval by the Nodal Agency (d) The applicant shall furnish documents required under Regulation 5.8.(xi) of these Regulations, as applicable, for such additional capacity, and shall also be subject to other Regulations including Regulation 3, 11A, 11B, 24, 24.6 of these Regulations.	
6	5.2a	New	(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: 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 21 months from date of application.	(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: 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 21 months from date of application.	SCOD has to be provided by the applicant at the time of application . accordingly 21 months is proposed considering 03 months of application processing time.

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		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. Provided also that such additional generation capacity shall also comply with	Nodal Agency whichever is later. Provided also that such additional generation capacity shall also comply with	
		the date of effectiveness of these amendments or date of approval by the Nodal Agency, whichever is later. Provided also that such additional generation capacity shall also comply with	Clauses (a), (b) and 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.”	
		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.”	“(d) The Renewable Power Park Developer shall furnish the scheduled date of commercial operation of the generating stations under the Park prior to grant-of final grant of connectivity for the purpose of compliance under Regulation 24.6 only.” Provided that if SCOD of the generation projects is are not submitted prior to issuance of final grant of connectivity, Start date of connectivity shall be considered as the SCOD of the corresponding capacity .	
7	5.8 (vii) (d)	New	“(d) The Renewable Power Park Developer shall furnish the scheduled date of commercial operation of the generating station under the Park prior to grant of final connectivity.”	Further the SCODs should be within six months from the start date of connectivity requested by the RPPD to avoid squatting of the connectivity and idling of the transmission system.



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				Provided further that, SCOD of an individual generator shall not be beyond six months of start date of connectivity.	
8	5.8 (xii)	New	(xii) The details of promoters and their shareholding pattern in the Company.”		
9	5.11(a)	New	Entities with Restricted Access (a) An REGS (with or without ESS) based on Wind source or ESS may seek Connectivity with restricted access (non-solar hours) at a terminal bay of an ISTS substation: (i) Through a separate dedicated transmission system, or (ii) Which is already allocated to another REGS or Renewable Power Park, with restricted access (solar hours), Example: An REGS (Wind - 400 MW, ESS - 200 MW) may seek Connectivity of 600 MW with restricted access rights, where injection scheduling rights during solar hours shall be Nil and injection scheduling	Entities with Restricted Access (a) An REGS (with or without ESS) or RPPD based on Wind source with or without ESS may seek Connectivity with Restricted Access (non-solar hours) at a terminal bay of an ISTS substation: (i) Through a separate dedicated transmission system, or (ii) Which is already allocated to another REGS or Renewable Power Park, with restricted access (solar hours), Example: An REGS (Wind - 400 MW, ESS - 200 MW) may seek Connectivity of 600 MW with restricted access rights, where injection scheduling rights during solar hours shall be Nil and injection scheduling rights during non-solar hours shall be 600 MW.	

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10	5.11(b)	New	rights during non-solar hours shall be 600 MW. 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: 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 a period of three months from effectiveness of this Regulation:	The In principle or final grant of Connectivity intimated to Standalone ESS or an REGS (with or without ESS) or RPPD based on solar source with or without ESS 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 (Solar hours) corresponding to solar capacity and Restricted access other than peak Solar hours corresponding to ESS capacity—(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: 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 this Regulation 5.11(a) of these regulations, within a period of three months from effectiveness of this Regulation:	Example covering all type of combination of RE sources their granted connectivity capacity and injection entitlement rights during solar, peak solar and non solar hours is tabulated at end.
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			Provided further that if the quantum of Connectivity that can be made available for non-solar hours is less than 50 MW, such RES or RHGS shall not be considered for conversion as to an entity with restricted access. Examples: (i) If an REGS based on a Solar source has been granted Connectivity of 1000 MW, such entity shall have restricted injection scheduling rights for 1000 MW in Solar hours and shall have no injection scheduling rights during Non-Solar hours. (ii) If an RHGS (Solar - 700 MW, Wind - 400 MW, ESS - 200 MW) having Connectivity of 1000 MW shall have restricted access rights, where injection scheduling rights during solar hours shall be for 1000 MW and injection scheduling rights during non-solar hours shall be 600MW (400 MW Wind + 200 MW ESS). (iii) If an RHGS (Solar - 600 MW, Wind - 500 MW, ESS - 160 MW) has Connectivity of 700 MW, if converted under restricted access, injection scheduling rights during non-solar hours shall be for 660 MW (500+160	Provided further that if the quantum of Connectivity that can be made available for non-solar hours is less than 50 MW, such capacity RES-or RHGS shall not be considered for conversion as to an entity with restricted access. Examples: (i) If an REGS based on a Solar source has been granted Connectivity of 1000 MW, such entity shall have restricted injection scheduling rights for 1000 MW in Solar hours and shall have no injection scheduling rights during Non-Solar hours. (ii) If an RHGS (Solar - 700 MW, Wind - 400 MW, ESS - 200 MW) having Connectivity of 1000 MW shall have restricted access rights, where injection scheduling rights during solar hours shall be for 1000 MW and injection scheduling rights during non-solar hours shall be 600MW (400 MW Wind + 200 MW ESS). (iii) If an RHGS (Solar - 600 MW, Wind - 500 MW, ESS - 160 MW) has Connectivity of 700 MW, if converted under restricted access, injection scheduling rights during non-solar hours shall be for 660 MW (500+160
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11	5.11(c)	New	200 MW ESS). (iii) If an RHGS (Solar - 600 MW, Wind - 500 MW, ESS - 160 MW) has Connectivity of 700 MW, if converted under restricted access, injection scheduling rights during non-solar hours shall be for 660 MW (500+160 MW) leaving 40 MW (700-(500+160)) for conversion under restricted access and the same shall not be considered for such conversion since it is less than 50 MW.	MW) leaving 40 MW (700-(500+160)) for conversion under restricted access and the same shall not be considered for such conversion since it is less than 50 MW.	
			REGS (with or without ESS) based on a solar source or an RHGS with a combination of solar source with another source, including ESS seeking Connectivity under Regulation 4.1 of these regulations, shall be considered for grant of Connectivity as an entity with restricted access: Provided that if the quantum of Connectivity that can be made available for non-solar hours is less than 50 MW, such REGS or RHGS shall not be considered as an entity with restricted access.	REGS (with or without ESS) based on a solar source or an RHGS with a combination of solar source with another source, including ESS seeking Connectivity under Regulation 4.1 of these regulations, shall be considered for grant of Connectivity as an entity with restricted access: Provided that if the quantum of Connectivity that can be made available for non-solar hours is less than 50 MW, such REGS or RHGS shall not be considered as an entity with restricted access.	

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		non-solar hours is less than 50 MW, such REGS or RHS shall not be considered as an entity with restricted access. Example: An RHGS (Solar - 700 MW, Wind - 400 MW, ESS - 200 MW) seeking Connectivity for 1000 MW shall be granted Connectivity with restricted access right, where injection scheduling rights during solar hours shall be for 1000 MW and injection scheduling rights during non-solar hours shall be 600MW (400 MW Wind + 200 MW ESS).	Example: An RHGS (Solar - 700 MW, Wind - 400 MW, ESS - 200 MW) seeking Connectivity for 1000 MW shall be granted Connectivity with restricted access right, where injection scheduling rights during solar hours shall be for 1000 MW and injection scheduling rights during non-solar hours shall be 600MW (400 MW Wind + 200 MW ESS).	
12	5.11(d)	The Detailed modalities for entities with restricted access shall be as per Annexure-IV of these Regulations.		
13	11A(6)	“(6) Any changes in shareholding pattern of the Connectivity grantee upto CoD of the project shall be subject to the following: (a) The promoters of the Connectivity grantee shall not cede control (where	“(6) Any changes in shareholding pattern of the Connectivity grantee from the date of application upto CoD of the project shall be subject to the following: (a) The promoters of the Connectivity grantee shall not cede control (where	Any change in the promoter shareholding or change in the controlling stake from date of application upto the date of COD of the project shall not be allowed without prior approval of the commission. In case of default,

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		control shall mean the ownership, directly or indirectly, of more than 50% of the voting shares of such Company or right to appoint majority Directors) of the Company. (b) In case the Connectivity grantee has multiple promoters (but none of the shareholders have more than 50% of voting rights and paid-up share capital), the shareholding pattern shall be maintained and cannot be changed upto COD of the project. (c) Any change in shareholding pattern other than covered in sub-clauses (a) and (b) shall require prior approval of the nodal agency and shall be filed for information of commission within 45 days of such approval. Nodal Agency may allow such application considering the practical Statutory requirement for change in shareholding. (d) In case any change in control or shareholding pattern of the Connectivity grantee is carried out in contravention to sub-clauses (a) to (c) of this Clause, the Connectivity shall be revoked, Bank Guarantee submitted under subclause	connectivity shall be revoked and all available BG shall be encashed. Practical requirement" is subjective and is difficult to judge and accordingly change in share holdings patten may be allowed only for the cases arising out of statutory requirement
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14	19.2	Provided that such additional GNA quantum to be added in each of the next three financial years shall be applicable from a	(d) In case any change in control or shareholding pattern of the Connectivity grantee is carried out in contravention to sub-clauses (a) to (c) of this Clause, the Connectivity shall be revoked, Bank Guarantee submitted under subclause (c) of Clause (vii) or sub-clause (c) of Clause (xi) of Regulation 5.8 of these regulations shall be encashed, and Conn-BG1, Conn-BG2 and Conn-BG3 shall be treated in terms of Regulation 24.2 or Regulation 24.3 of these regulations, as applicable.”		
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		specified date of the respective financial year.			
15	24.6 (d)	Connectivity granted to a Renewable Power Park developer shall be revoked for the corresponding capacity, if the Renewable Power Park developer has been made effective in terms of Clause (a) of Regulation 22.4 of these regulations and generating station(s) within the Power Park fails to achieve COD on or before, “	Connectivity granted to a Renewable Power Park developer shall be revoked for the corresponding capacity, if the Renewable Power Park developer has been made effective in terms of Clause (a) of Regulation 22.4 of these regulations and generating station(s) within the Power Park fails to achieve COD on or before, “		
	Annexure-IV Modalities				
16	1(d)		The scheduled date of commercial operation shall not be more than 18 months from the date of intimation	The scheduled date of commercial operation shall not be more than 18 21 months from the date of intimation of	

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17	1 (e)	of the in-principle grant of connectivity. In case an entity covered under Regulation 5.11 (a) of these regulations is granted Connectivity through a sub-pooling station of an entity under Regulation 5.11(b) or 5.11(c), an agreement shall be entered into between these entities for sharing of a dedicated transmission system including payment of charges towards using the dedicated transmission system in proportion to the quantum of Connectivity granted to each of such entities which shall be mutually agreed between the parties.	the in-principle grant of connectivity application. To be deleted.	The sharing agreement referred in 1(a)(e) of Annexure -IV shall be only for the commercial arrangement between Connectivity grantees. However, the grantees shall be bound to share the transmission infrastructure as decided by CTUIL in the stakeholder consultation meeting for evolution of transmission system. This is in line with the advisory upload on CTUIL website regarding sharing of dedicated infrastructure and bay between two applicants.
18	1 (f)	Nodal Agency shall publish, within 30 days of notification of this Regulations, the indicative Capital Cost of various configurations of the dedicated transmission system as a reference cost to enable cost sharing between entities. The Nodal Agency shall update such a list based on newer configurations and updated indicative capital cost.	To be deleted	
19	1(h)	For cases covered under Clause (1)(e) of this Annexure, Connectivity Bank	For cases covered under Clause (1)(e) of this Annexure, Connectivity Bank	Apportion and securing new BG for the sharing entities for the already submitted BG shall be a difficult and

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		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	Guarantee viz Conn-BG2 and Conn BG 1 and Conn-BG3 as per Regulation 8 of these Regulations shall be submitted separately by each entity. , 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	complex preposition . It is proposed that provision may be made for submission of Conn BG3 @ 2 lakhs /MW by new sharing entities also in addition to the BG submitted by the existing grantee.
20	1(i)	For cases covered under Clause (1)(e) of this Annexure, One time GNA charges already furnished by an entity under Regulation 5.11(b) or 5.11(c) shall be shared on a prorate basis (on the basis of quantum of Connectivity) between the entity under Regulation 5.11(b) or 5.11(c) and entity covered under Regulation 5.11 (a) of these regulations.	For cases covered under Clause (1)(e) of this Annexure, One time GNA charges shall be furnished separately by each entity in terms of Regulation 22.2(d) of these Regulations. already furnished by an entity under Regulation 5.11(b) or 5.11(c) shall be shared on a prorate basis (on the basis of quantum of Connectivity) between the entity under Regulation 5.11(b) or 5.11(c) and entity covered under Regulation 5.11 (a) of these regulations.	It is proposed that new entities may also be made liable to pay one time GNA charges @ 1 lakhs/MW in addition to the provision already made for one time GNA charges to be paid by the existing grantee.

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Illustrative examples for Injection entitlement for connectivity granted to various RE sources in combination with ESS

Source	Connectivity	Peak Solar (Solar+Wind) Scheduling of ESS injection prohibited	Non-peak Solar(Solar+Wind+ESS)	Non Solar(Wind+ESS) scheduling of Solar injection prohibited.	Remarks
Solar - 300	300	300	300	0	This entitlement is calculated considering that ESS shall have no injection entitlement during peak solar hour and solar capacity shall not inject during non- solar hours.
Wind-300	300	300	300	300	
Standalone ESS-100	100	0	100	100	
Solar-300, ESS - 100	400	300	400	100	
Wind-300, ESS - 100	400	300	400	400	
Solar-300, Wind - 200, ESS - 100	600	500	600	300	
Solar-300, Wind - 200, ESS - 100	500	500	500	300	
Solar - 700 MW, Wind - 400 MW, ESS - 200 MW)	1300	1100	1300	600	
Solar - 700 MW, Wind - 400 MW, ESS - 200 MW)	1000	1000	1000	600	