CAPTIVE POWER PRODUCERS ASSOCIATION
(Registered U/sec. 25 of Company Act 1956 & Certificate of IT 12AA
CIN: U91990MH2003GAP141611)

Secretariat Office
Technocraft Industries (India) Ltd.
Technocrat House A-25 MIDC, Marol Andheri (East),
Mumbai 400093
Contact: Nitin Ghorpade, Director
Email: nitinghorpade4243@gmail.com
Contact No. 9967013135

Vikas Patangia
PRESIDENT

Date: 03rd April 2025

To,
Secretary
Central Electricity Regulatory Commission
3rd & 4th Floor, Chanderlok Building,
36, Janpath, New Delhi-110001
Email: secy@cercind.gov.in; shilpa@cercind.gov.in.

Subject: Suggestions /Comments on proposed CERC (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025.

Dear Sir,

In response to your public notice dated 03rd March 2025 inviting suggestions and comments from the stakeholders on **'Suggestions /Comments on proposed CERC (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025'**, we would like to submit our comments as per the enclosed Annexure-I for your kind consideration.

Thanking you.
For CAPTIVE POWER PRODUCERS' ASSOCIATION

Nitin S. Ghorpade
Director (CPPA)

Annexure-I: - Suggestions /Comments on CERC (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025

Sr. No.	Regula9ation	Proposed Amendment	Suggestion / Comment	Rationale
1.	**5.2 (a) (a)**	*5.2 (a) The additional generation capacity under Regulation 5.2 of these regulations shall be subject to the following conditions:* *(a) 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;*	We request that the applicants should be allowed to seek connectivity for additional capacity with scheduled date beyond duration of 18 months.	The time required for construction and commissioning of additional capacity for which approval is being sought depends on type of RE -wind, solar, with or without ESS.
2.	**5.8 (vii) (d)**	*….* *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*	Provided that connectivity grantee may seek to revise the scheduled commercial operation date with prior notice to nodal agency prior to 180 days from the scheduled commercial operation date.	Request the proposed date extension shall help the generating station to consider delay in project completion due to unforeseen and beyond control reasons.
3.	**5.11**	*5.11 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:*	We understand that entity seeking connectivity with restricted access (non-solar hours) can also seek or may already have connectivity for solar hours as well.	An REGS (with or without ESS) based on Wind source or ESS should be allowed to seek connectivity for solar hours, restricted access (non-solar) or both simultaneously.

Sr. No.	Regula9ation	Proposed Amendment	Suggestion / Comment	Rationale
		(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.*	Request to clarify by providing additional proviso as below *Provided that the entity may seek for connectivity for solar hours as well as non-solar hours simultaneously*	
4.	**Regulation 15**	New Proposal One Time permanent Transfer of Connectivity / GNA among group companies.	The current regulation allows that connectivity (and GNA of a bulk consumers) may be utilized in part or full by its subsidiaries or vice versa when they are connected to same connection point of ISTS. We request the Hounarable commission that the new proviso to this regulation may be added so that connectivity / GNA of bulk consumers can be allowed to be transferred entirely to its subsidiary, parent company or subsidiary of same parent company, with all the obligations and responsibilities being shifted	Such provision if implemented would greatly benefit bigger organisations having multiple subsidiary or parent with multiple subsidiary companies, may require changing the entity for the business need. If not provided entity needs to first surrender the already granted GNA and then again make a fresh application for the same quantum and for the same period though other entity.

Sr. No.	Regula9ation	Proposed Amendment	Suggestion / Comment	Rationale
			to new grantee. Such transfer may be allowed during the span of connectivity/ GNA.	
5.	**Regulation 19**	New Proposal 1. GNA grantee shall be granted additional GNA through an application and suitable changes/amend the existing documents. 2. GNA grantee shall be permitted to seek extension of part or full quantum of approved GNA.	We request the honourable commission to amend regulation so that existing GNA grantees are allowed to seek additional GNA or extend the GNA end date without having to execute fresh documents such as signing of connection agreements.	In case an existing GNA grantee which is a bulk consumer, seeking to increase its GNA quantum or to extend (part or full) the end date of GNA granted the entity must apply for fresh GNA application and fresh documentation needs to be completed. The current regulation does not have provision to seek additional GNA or extend end date of the existing GNA quantum, hence same shall be permitted through an application may be at least six months prior to end date of GNA. Connectivity bank guarantees for such additional GNA granted shall be provided by such grantee as applicable under the regulation.
6.	**Regulation 23**	New Proposal Use of GNA by other GNA grantee - Timelines and responsibilities.	The current regulation 23 allows, with prior approval of nodal agency, an existing GNA grantee to transfer its GNA in full or in part to other GNA grantee for their use To facilitate a quicker transfer of GNA, we propose simplifying the process in the following manner:	The regulator has included this provision for optimal and efficient use of transmissions capacity among the users. However, currently processing time for GNA transfer applications adds up to 6 to 7 months. The current procedure and corresponding timeframes for GNA transfer are summarized as follows:

Sr. No.	Regula9ation	Proposed Amendment	Suggestion / Comment	Rationale
			1. Allow applications for GNA and GNA transfer to be submitted simultaneously, enabling CTU to consider the applications together based on the NOC for both GNA and GNA transfer from STU. 2. Since the transfer of GNA is similar to T-GNA approval, which is granted based on Available Transfer Capability (ATC) and NOC from STU, we recommend reducing the minimum timeframe for granting transfer from 45 days to 15 days. 3. CTU should consider these applications in the separate stakeholder meetings rather than in the routine consultation meetings, which are convened every month or two. We request the honourable commission that suitable amendment be issued in this regard.	1. The transferee entity must first be a GNA grantee. 2. Despite the potential for a short transfer period (up to three years), the entity is required to apply for GNA (minimum of 1 MW) to become a GNA grantee solely for the purpose of utilizing GNA under Regulation 23.1. 3. The GNA approval application process includes: a) Application to STU for a No Objection Certificate (NOC) and approval: a minimum of 1 month. b) Application to CTU for GNA approval: approximately 2-3 months. c) Application to STU for NOC regarding GNA transfer: at least 1 month. d) Application to CTU for GNA transfer: a minimum of 45 days, with approval taking an additional 2 months. 4. As such, the entire process requires 6-7 months, which undermines the purpose of optimizing GNA usage and, by extension, the efficiency of the transmission network.

<table>
<tr><th>Sr. No.</th><th>Regula9ation</th><th>Proposed Amendment</th><th>Suggestion / Comment</th><th>Rationale</th></tr>
<tr><td>7.</td><td>New Proposal</td><td>New Proposal

GNA with restricted access</td><td>The draft fourth amendment proposes that an entity may seek connectivity with restricted access i.e. connectivity with solar only hours or connectivity with non - solar hours or both based on technology of RE generation and ESS capacity etc.

Similar provision may be introduced for GNA entities and GNA with restricted access may also be proposed</td><td>Large industries with captive generation, may have power requirement from the market during a particular hour during a day throughout the years.

This may be due to certain reason such as on nature of captive generation such as solar, soalr+wind, solar+wind+ESS or even thermal and gas-based generation.

Under current regulations such drawee with power requirement for selected hours shall have to pay the GNA charges for RTC capacity</td></tr>
<tr><td>8.</td><td>Additional</td><td>Clarification required</td><td colspan="2">In case BESS installed to supply power during evening peak (non-solar) hours, where a solar-based plant is specifically set up for charging the ESS, regulatory clarification is required regarding the classification and treatment of the solar plant. It should be explicitly clarified whether the solar plant, in this context, necessitates the connectivity during solar hours.

<u>Cases- 1</u> BESS for supply during non-solar hours only

<table>
<tr><td>Existing Connectivity – Tech.</td><td>Existing Connectivity</td><td>Connectivity – Quantum</td><td>Technology</td><td>Quantum to cater to</td></tr>
<tr><td>NA</td><td>NA</td><td>30 MW</td><td>BESS</td><td>Non-Solar Hours</td></tr>
</table>

For charging the BESS, a co-located solar capacity of about 85 MW is required. It is requested from the Hon’ble Commission to provide clarifications on the treatment of this solar capacity. Whether it will be considered as a separate generating entity and connectivity of 85 MW during Solar Hours will also be</td></tr>
</table>

<table>
<tr><th>Sr. No.</th><th>Regula9ation</th><th>Proposed Amendment</th><th>Suggestion / Comment</th><th>Rationale</th></tr>
<tr><td></td><td></td><td></td><td colspan="2">required? Will the CONN-BGs be required to submit for the total capacity (i.e., 30 MW (BESS) + 85 MW (Solar) = 115 MW) or only for the BESS capacity? For sake of ample clarity, it is reiterated that the energy will only be supplied by BESS during non-solar hours.
<u>Our suggestion is that in this scenario, connectivity of only 30MW of non-solar hours should be required with corresponding BGs.</u>

Case-2 Additional ESS for supply during non-solar hours

<table>
<tr><td>Existing Connectivity – Tech.</td><td>Existing Connectivity</td><td>Additional system – Quantum</td><td>Additional system – Technology</td><td>Additional Quantum to cater to</td></tr>
<tr><td>Solar – generating capacity – 100 MW</td><td>100</td><td>85 + 30</td><td>Solar + BESS</td><td>Non-Solar Hours</td></tr>
</table>
For charging the BESS, an additional co-located solar capacity of about 85 MW is required. It is requested from the Hon’ble Commission to provide clarifications on the treatment of this additional solar capacity, should this solar capacity be considered as a separate generating entity? And CONN-BGs will be required to submit for the total generating capacity (i.e., 30 MW (BESS) + 85 MW (Solar) = 115 MW) or only for the BESS capacity?

<u>Our suggestion is that in this scenario, the additional connectivity of only 30MW of non-solar hours should be required with corresponding BGs.</u></td></tr>
</table>