

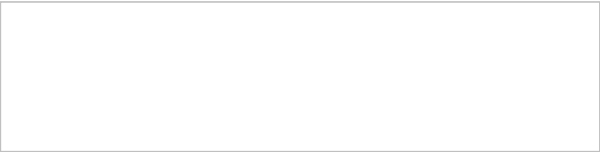
===== Forwarded message =====  
From: <tejas.shinde@egreenpower.co>  
To: "Suvijit Suvijit" <ecourtastt101@cercind.gov.in>, "Shilpa Agarwal" <shilpa@cercind.gov.in>  
Cc: <kapil.sharma@egreenpower.co>  
Date: Mon, 07 Apr 2025 16:56:25 +0530  
Subject: Request for invitation for the GNA 4th Amendment Meeting.  
===== Forwarded message =====

Dear Sir/Madam,

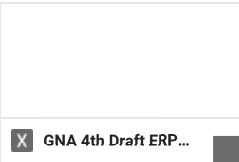
We M/s. Evergreen Renewables Pvt Ltd want to participate in the CERC hearing for the GNA 4<sup>th</sup> Amendment. We request to please share the virtual link for the same.

Also please find attached the comments for your kind consideration.

Best Regards,  
**Tejas Shinde** | Assistant Manager - Business Development and Regulatory Affairs  
+91-7798712370  
Evergreen Renewables Private Limited  
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One attachment • Scanned by Gmail



ERPL comments on Draft CERC (Connectivity and General Network Access to the Inter-State Transmission System) (Fourth Amendment) Regulations, 2025				
Sl No	Existing Regulation No	Existing Regulation clause	Proposed Changes/Suggestions by ERPL	Justifications
1	Regulation 2.3	(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.	Provided inputs from existing Solar developers may be taken before declaration by NLDC.	<p>1. In case a solar project is set up to sell power for ~10 hours daily, but later NLDC declares solar hours to 8, then such project losing 2hrs of power sale. This directly impacts revenue and cause financial loss. The framework for defining these hrs must ensure that there is no generation loss for existing solar projects.</p> <p>2. The methodology for determining solar hours should incorporate project-specific factors, such as geographical location and technology type, to prevent unnecessary curtailment.</p>
2	Regulation 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;	Both these BG's has to be removed	<p>The additional generation capacity is being added under the same connectivity quantum for which the required Conn-BGs have been duly submitted by the Connectivity Grantees.</p> <p>Conn-BG3 is submitted for allocation of surplus capacity in existing transmission system. As per proposed amendment, new capacity is added during solar/non-solar hours within same connectivity. Therefore, it is suggested that the requirement of additional Conn-BG3 and CON BG1 to be deleted, since no additional transmission system is being created or required for accommodating additional generation capacity which is being added within the connectivity already granted.</p>
3	Regulation 5.2 a (c)	(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;	(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 be <b>24 months</b> from date of approval by the Nodal Agency <b>or SCD date as mentioned in the PPA or 60 days plus firm date of connectivity whichever is later.</b>	SCD date shall also be linked with firm date of connectivity

4	Regulation 11A	(a) The promoters of the Connectivity grantee shall not cede control (where 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.	Any change in shareholding within same group of companies shall not amount to change in shareholding under these regulations	It is possible that there may be change in shareholding of connectivity grantee within the same group company having the same ultimate parent company with an objective of internal restructuring etc, then there should not be any restrictions as proposed in the draft given that the same ultimate parent company still holds the controlling shareholding of grantee either directly or indirectly
5	Annexure - IV	9.1 (1) (d) The scheduled date of commercial operation shall not be more than 18 months from the date of intimation of the in-principle grant of connectivity.	9.1 (1) (d) The scheduled date of commercial operation shall not be more than <b>24 months</b> from the date of intimation of the in-principle grant of connectivity.	SCD date shall also be linked with firm date of connectivity