

Ref: IGL/CERC/25-26/292

Date: 03.04.2025

To,  
The Secretary  
6th, 7th & 8th Floors  
Tower B, World Trade Centre  
Nauroji Nagar, New Delhi- 110029

**Sub: Indigrid Comments/suggestion on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations 2025**

**Ref: No. L-1/261/2021/CERC      Dated: 03.03.2025**

Dear Sir,

Please find attached Indigrid comments on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations 2025 for kind consideration of Hon'ble Commission.

Thanking you,  
Yours sincerely,



Lokendra Singh Ranawat  
Head Regulatory  
Indigrid Limited

Indigrid Limited

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

Clause	Clause as per regulation	Proposed Suggestive Changes by Indigrid	Rationale
Regulation 5.8(xi)	<p>In case of Applicants which are REGS (other than Hydro generating station) or ESS (excluding Pumped Storage Plant (PSP)) the following documents shall be submitted :</p> <p>(a) Letter of Award (LOA) by, or Power Purchase Agreement (PPA) entered into with, a <b>Renewable Energy Implementing Agency</b> or a distribution licensee or an authorized agency on behalf of distribution licensee consequent to tariff based competitive bidding, as the case may be</p>	<p>In case of Applicants which are REGS (other than Hydro generating station) or ESS (excluding Pumped Storage Plant (PSP)) the following documents shall be submitted :</p> <p>(a) Letter of Award (LOA) by, or Power Purchase Agreement (PPA) entered into with, a Renewable Energy Implementing Agency or a <b>BESS Implementing Agency (BIA)</b> or a distribution licensee or an authorized agency on behalf of distribution licensee consequent to tariff based competitive bidding, as the case may be.</p> <p>Additionally, A new Clause, namely, Clause (ag-ii), shall be added after Clause (ag-i) of Regulation 2.1 of the Principal Regulations as under:</p> <p>(ag-ii) "BESS Implementing Agency" or 'BIA' includes:</p> <p>(i) an organization designated by the Ministry of Power to implement the Viability Gap Funding (VGF) scheme for BESS development, initiating the bidding process and signing Battery Energy</p>	<p>To reduce carbon emission intensity and meet the INDC target by 2030, the Ministry of Power has established a framework for the development of Battery Energy Storage Systems. As part of this framework, the Viability Gap Funding (VGF) scheme has been proposed to incentivize energy storage systems and will be implemented through an <b>implementing agency</b>. The VGF scheme outlines the following capacity for a three-year period:</p> <ul style="list-style-type: none"> <li>State component: 5000 MWh</li> <li>CPSU component: 5000 MWh</li> </ul> <p>Further, as per the CEA report on optimal generation capacity mix for 2029-30, the installed capacity of battery energy storage is projected at the end of the year 2029-30 is ~27,000 MW/108,000 MWh.</p> <p>Additionally, the implementing agency appointed by the Ministry will follow the procedure for awarding contracts in accordance with the <b>guidelines set by the Ministry of Power for the tariff-based competitive bidding process</b>. A similar procedure followed by the renewable implementing agency (REIA).</p>

		Storage Purchase Agreements (BESPA).	Therefore, it is requested that the Hon'ble Commission may please amend the regulation to allow applicants to apply for connectivity by submitting the Lol/PPA entered into with a BESS Implementing Agency (BIA). This amendment will enable developers to obtain connectivity in a timely manner without incurring additional financial burden by applying through land route/land BG route.
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