

Ref:JRPL/CERC/GNA_4/04042025

Dated: 04-04-2025

Shri Harpreet Singh Pruthi
Secretary
Central Electricity Regulatory Commission
3rd & 4th Floor, Chanderlok Building,
36, Janpath, New Delhi-110001

Subject: - JRPL Comments/suggestions on Draft 4th Amendment to CERC Connectivity and GNA Regulations, 2025

Respected Sir,

Jindal Renewable Private Ltd. (JRPL), a part of the Naveen Jindal Group, aspires to emerge as a leading player in India's clean energy sector, emphasizing both renewable generation and energy storage projects (RE projects). With a vision to align with India's decarbonization goals and lead in the clean energy sector, JRPL aims to develop around 15 GW of RE projects by 2030 contributing to India's clean energy transition.

This is with reference to the CERC notification on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025 dated 3 March 2025. We are submitting our comments as Annexure-I for your reference.

We request CERC to kindly consider our comments/suggestions while finalizing the Draft 4th Amendment to CERC Connectivity and GNA Regulations, 2025.

Sincerely

For **Jindal Renewable Private Limited**



Manish Tyagi

Authorized Signatory

Encl: Annexure I

JINDAL RENEWABLE PRIVATE LIMITED

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Annexure I

JRPL Comments in Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2024

Clause No.	Draft Amended Regulation	Changed Proposed	Rationale
Regulation (ak-i)	(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.	(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. <u>Provided inputs from existing Solar developers may be taken before declaration by NLDC.</u>	For projects whose grid access is restricted to the declared solar hours, it is essential to establish a methodology that safeguards their energy generation and financial viability. We request the Hon'ble Commission to consider developer inputs before finalizing the classification of solar and non-solar hours and issue clear guidelines on the declaration of solar hours, ensuring that the regulatory framework supports optimal utilization of solar energy without causing unintended generation losses.
Regulation 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) Connectivity Bank Guarantee Conn-BG1 and Conn-BG3	5.2 a 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	Conn-BG1 and Conn-BG3 are sought for the allocation of surplus capacity in the existing transmission system. As per the proposed amendment, new capacity is added during solar/non-solar

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	under Regulation 8 of these regulations shall be furnished by the existing grantee for such additional generation capacity;	Regulation 8 of these regulations shall be furnished by the existing grantee for such additional generation capacity;	hours within the same granted connectivity. Therefore, we suggest removing the requirement for additional Conn-BG1 and Conn-BG3, as no new transmission infrastructure is being developed or needed to accommodate the additional generation capacity within the already granted connectivity. The proposed provision results in the submission of multiple Conn-BG1 and Conn-BG3 for the same system is not necessary.
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 18-24 months from date of approval by the Nodal Agency or SCD date as mentioned in the PPA or 60 days plus firm date of connectivity whichever is later.	Additional capacity should be given time of atleast 24 months. Further, SCD date must be aligned as per provisions mentioned under the bid documents (including PPA) and should also be linked with firm date of connectivity.
Regulation 5.8 (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.	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.	A RPPD develops a park with the objective of offering the infrastructure and connectivity to prospective RE developers for developing a RE project within the park. At the time of development of the park and securing the connectivity, the RE developer is not

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			<p>finalised. It would not be possible for a RPPD to furnish the SCOD of the generating station, that too prior to grant of final connectivity. It is hence suggested that this proposed draft be removed.</p> <p>RPPD should be required under Regulation 11A to intimate the Nodal Agency before six months from start date of connectivity, the details of the generation station(s) coming up within the park along with their SCOD(s).</p>
Regulation 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</p>	<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 three months after the expiry of three months one year 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</p>	<p>We respectfully request the Hon'ble Commission to grant developers a minimum of one year to decide whether to utilize their existing connectivity for non-solar hours.</p> <p>This additional time is essential to allow for a well-informed decision regarding the expansion of capacity</p> <p>Determining additional capacity requires significant capital investment and involves a series of critical activities, including but not limited to:</p> <ul style="list-style-type: none"> • Resource assessment • Energy modeling • Modifications to the existing scheme

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	<p>Regulation 5.2 or Regulation 5.11(a) of these regulations, within a period of three months from effectiveness of this Regulation:</p> <p>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 an entity with restricted access.</p>	<p>Regulation 5.11(a) of these regulations, within a period of three months 1 year from effectiveness of this Regulation:</p> <p>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 an entity with restricted access.</p>	<ul style="list-style-type: none"> • Techno-commercial analysis • Land availability assessment and necessary approvals from internal company boards and investors • Securing project funding <p>Given the complexity and time required for these activities, a minimum period of one year is necessary for existing connectivity grantees to assess and apply for additional capacity effectively.</p>
Regulation 11 A (6)	<p>(6) Any changes in shareholding pattern of the Connectivity grantee upto CoD of the project shall be subject to the following:</p> <p>(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.</p> <p>(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</p>	<p>(6) Any changes in shareholding pattern of the Connectivity grantee upto CoD of the project shall be subject to the following:</p> <p>(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.</p> <p>(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</p>	<p>The Hon'ble Commission has introduced shareholding restrictions to prevent the trading of connectivity. However, we request that changes in shareholding within group companies be permitted, provided that an intimation is given to CTUIL and the concerned Discoms/Nodal agency, as applicable. Additionally, this regulation should apply only prospectively to connectivity applications submitted to CTUIL after its effective date. It should not be enforced retrospectively on applications submitted before the regulation comes into effect.</p>

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	cannot be changed upto COD of the project.	COD of the project. Provided, any change in shareholding within same group of companies shall not amount to change in shareholding under these regulations Provided further, the provisions of this regulation (Regulation 11 A (6)) shall apply only to those applications for connectivity which have been made after the date of effectiveness of these regulations.	
Regulation 11 A (6)	(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 requirement for change in shareholding.	(c) Any change in shareholding pattern other than covered in sub-clauses (a) and (b) shall be required to provide an intimation to the nodal agency by no later than 30 days from the date of such change and shall be filed for information of commission within 45 days of such intimation . Nodal Agency may allow such application considering the practical requirement for change in shareholding.	

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