



Ref: PTC/CERC/2025/April-25

Date: April 3rd, 2025

To
Shri. Harpreet Singh Pruthi
Secretary
Central Electricity Regulatory Commission
7th Floor, World Trade Centre,
Tower B, Naurojinagar,
New Delhi-110029

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

Dear Sir,

This is with reference to your letter No. L-1/261/2021/CERC dated 3rd March 2025 regarding seeking comments on “**Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025**”.

You are requested to kindly consider the enclosed annexure (Annexure-A) of our comments for your kind reference and perusal. If deemed appropriate, we are also available for an in-person interaction to clarify any aspect.

Thanking you,

Yours faithfully,
For **PTC India Ltd.**

(Anand Kumar)
VP (IR & CS&P)

PTC India Limited

(Formerly known as Power Trading Corporation of India Limited)

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(Annexure-A)

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

The concept of “Restricted Access” introduced in the Draft Regulations marks a progressive shift from the existing RTC-based transmission booking framework. It offers renewable energy generating stations (REGS) with limited injection schedules a more tailored and efficient way to access the grid. By distinguishing injection rights across solar and non-solar hours, the amendment facilitates optimal utilization of transmission corridors in line with generation profiles. Additionally, the proposed framework enables various types of REGS to coordinate and share connectivity rights, thereby promoting better planning and utilization of transmission infrastructure while supporting the timely integration of renewable energy into the grid.

S. No.	Clauses	Comments/Suggestions
1.	New Clause (6) with Sub-clauses (a), (b), (c) of Regulation 11A of the Principal Regulations	The Draft Regulations specify provisions regarding changes in shareholding pattern for companies seeking Connectivity, ensuring that promoters maintain ownership stability until COD of the project. <i>“However, it is also proposed that the provisions may also be introduced for providing information regarding change of shareholding pattern to the beneficiaries involved.”</i>
2.	Clause (1) (e) of the New Annexure IV	To enhance clarity around the process of entering into agreements for sharing dedicated transmission systems, the following suggestions are proposed: “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 prior to availing connectivity through the pooling station , for sharing the dedicated transmission system, including the payment of charges for its use in proportion to the quantum of Connectivity granted to each entity, as mutually agreed upon by the parties.”