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Ref. No: RPIL/CERC/2025-26/01

Date: 03.04.2025

To,

The Secretary

Central Electricity Regulatory Commission

6th, 7th & 8th Floor, World Trade Centre, Tower B, Nauroji Nagar

New Delhi – 110029

Subject: Observations of RPIL on the ‘Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025’ issued on 03.03.2025

Reference: No. L-1/261/2021/CERC dt. 03/03/2025

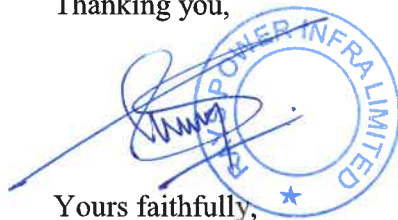
Sir,

With reference to your letter no. No. L-1/261/2021/CERC dated 3rd March, 2025 and letter no. L-1/261/2021/CERC, We, at Rays Power Infra Ltd., a prominent entity in the renewable energy EPC sector specializing in solar and wind parks as well as energy storage solutions, hereby submit our comments and suggestions on the aforementioned Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025 by Central Electricity Regulatory Commission published in March, 2025.

We remain grateful for your attention to our submission.

Please find enclosed our Comments and suggestions on the same enclosed as **Annexure-I**

Thanking you,



Yours faithfully,

Sudhanshu Vishwakarma
(Authorized Signatory)

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

Reg. No.	Proposed Fourth Amendment Draft Regulation	Comments/Suggestions
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.	<p><u>Clarification:</u></p> <ol style="list-style-type: none"> 1. For a specific project location, the generation hours determined by solar insolation may not align with the solar hours designated by NLDC. And this misalignment could lead to generation losses for that time which has not been declared as solar hours, resulting from the restricted scheduling of both solar and non-solar hours. Then how this issue shall be addressed in view of generation’s perspective? 2. Standalone wind generators or parks shall not be restricted under clause of solar and non-solar hours?
5.2.a (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;	<p><u>Issues:</u></p> <p>For additional generation expansion at the same connectivity point under Section 5.2 of the CERC GNA Regulation, the current project commissioning timeline of 18 months appears to be too short especially for Wind projects.</p> <p>The processes of land acquisition and WTG erection are challenging to complete within this timeframe.</p> <p><u>Suggestion:</u></p> <p>It is recommended to extend the timeline 18 month to 30-36 months to address for projects that involve complex infrastructure, permitting delays, or supply chain constraints.</p> <p align="center">Or</p> <p>Separate Timeline for ESS vs. REGS+ESS- Define different SCOD timelines for standalone ESS and REGS (Solar) with ESS, Standalone REGS (Wind) considering their unique development requirements.</p> <p>A slightly extended timeline can ensure smoother implementation without compromising quality.</p>
5.8. (vii). (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.	<p><u>Clarification:</u></p> <ol style="list-style-type: none"> 1. If the RPPD has obtained the final grant of connectivity before the notification issued, are they still required to resubmit same? <p><u>Suggestion:</u></p> <p><u>Under section 5.8 (vii).(d)</u></p> <ol style="list-style-type: none"> 1. Please allow a mechanism for revision of SCOD for RE park Developer, subject to valid justification and approval 2. Developer can propose SCOD as per the date regional transmission planning schedule.