

Date: 07.04.2025**To**

Central Electricity Regulatory Commission (CERC),
3rd & 4th Floor, Chanderlok Building,
36, Janpath, New Delhi – 110001

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

Dear Sir/Madam,

We sincerely appreciate the initiative taken by the Hon'ble Commission in proposing the Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025, and thank you for the opportunity to submit our comments.

The amendment's key proposal to divide the day into **solar and non-solar hours** and promote optimal utilization of ISTS infrastructure is highly progressive. This step will encourage greater integration of renewable energy, particularly hybrid and energy storage systems, and reduce grid fluctuations—an essential aspect of India's energy transition goals.

However, we seek a few clarifications to facilitate effective and unambiguous implementation of the regulations:

SN	Clause No.	Clarification needed
1.	5.11	If an applicant intends to apply under the Wind-Solar Hybrid (WSH) category, is it necessary to submit separate applications for solar and non-solar hours, or will a single application suffice?
2.	new	When a connectivity applicant is granted different capacities for solar and non-solar hours, how are ISTS charges and losses computed? Are the calculations done separately for solar and non-solar capacities or on a cumulative basis? If cumulative, which capacity (solar or non-solar) is considered for calculation purposes?

SN	Clause No.	Clarification needed
3.	new	If an applicant seeks non-solar hour connectivity through a pooling substation belonging to another solar power plant developer, how will energy measurement be carried out? Will CTUIL allocate the losses and charges, or must both developers mutually agree on a methodology?
4.	new	For an applicant under the WSH category, is there any penalty imposed if the developer fails to inject power during non-solar hours for a certain period?
5.	new	If an applicant is granted WSH category connectivity and wishes to transfer either the solar or non-solar hour connectivity to a third party, can CTUIL directly permit such a transfer, or is there a separate procedure that must be followed?

We request the Hon'ble Commission to kindly provide clarity on the above points, which will greatly aid stakeholders in ensuring seamless adoption of the proposed framework.

We would also like to confirm our participation in the public hearing scheduled on **09.04.2025 at 10:00 AM** via video conferencing. Kindly acknowledge and confirm our registration for the same. We may also provide a brief presentation if permitted.

Thank you once again for this commendable step toward a robust and inclusive grid access mechanism.

Warm regards,

Atul Parmar

CEO