

March 8<sup>th</sup>, 2024

Ref: EG/CERC/GNA/01/24

To,  
The Secretary,  
Central Electricity Regulatory Commission  
3rd & 4th Floor, Chanderlok Building,  
36, Janpath, New Delhi – 110 001  
E-mail: [secy@cercind.gov.in](mailto:secy@cercind.gov.in) / [ashutosh.sharma@nic.in](mailto:ashutosh.sharma@nic.in)

**Subject: Comments on the draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Second Amendment) Regulations, 2024.**

Dear Sir,

We are thankful and appreciate the Hon'ble Central Electricity Regulatory Commission (CERC) efforts to notify the draft *Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Second Amendment) Regulations, 2024*. The draft has provisioned progressive clauses in order to streamline Connectivity and General Network Access. However, there are a few concerns on a few of the clauses and more clarity is required. In this regard, we are submitting our comments on the draft regulations attached here as Annexure- A.

**About the Company:** Enfinity Global is a global sustainability platform focused on developing, financing, building, operating and owning renewable energy assets including energy storage and alternative fuels. As on date, Enfinity Global has a committed pipeline of over 17.2 GW of renewable energy projects across the regions of the United States of America, Europe, United Kingdom, Japan, and India, with approximately 190 management employees spread across 7 offices around the world. Enfinity Global, is one of the fastest growing sustainability organizations in the world.

We are setting up 3,000 MW Solar, Wind, Hybrid power plants and 1 MMTPA Green Hydrogen and Ammonia Production plant across India.

**Our Request:**

In lieu of the aforesaid, we request to consider our comments on the draft regulations while finalization of the regulations.

Thank You for your consideration,  
Yours sincerely,

A handwritten signature in blue ink, appearing to read "Antriksh Singh Bisht", with a horizontal line underneath.

Antriksh Singh Bisht  
For **Enfinity Global**

Encloser: Annexure - A

## Enfinity Global comments on the draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Second Amendment) Regulations, 2024

#	Clause No.	Existing Clause	Proposed Modifications/ Suggestions	Rationale/Remarks
1	3	<b>Amendment to Regulation 3.5 of the Principal Regulations</b>		
1.1	3.5	After scrutiny, the Nodal Agency shall intimate the deficiencies, if any, in the application for grant of Connectivity or grant of GNA, to the Applicant within Eighteen (18) days of the receipt of application, in order of date and time of receipt of application. The Applicant shall rectify the deficiency within one week thereafter, failing which the application shall be closed and 20% of the application fee shall be forfeited. Balance 80% of the application fee shall be refunded by the Nodal Agency to the Applicant within 15 days of closure of the application.	After scrutiny, the Nodal Agency shall intimate the deficiencies, if any, in the application for grant of Connectivity or grant of GNA, to the Applicant within Eighteen (18) days of the receipt of application, in order of date and time of receipt of application. The Applicant shall rectify the deficiency within <b>Eighteen (18) days</b> thereafter, failing which the application shall be closed and 20% of the application fee shall be forfeited. Balance 80% of the application fee shall be refunded by the Nodal Agency to the Applicant within 15 days of closure of the application.	For rectifying the deficiencies intimated by the Nodal Agency, developers also required to obtain data/records from various government agencies, adhering to specific procedures established by the respective departments. Considering these factors, the current 7-day timeframe allocated for rectifying deficiencies may not be adequate. Hence, we request an extension of the timeframe to 18 days for applicants to rectify application deficiencies without changing the time stamp in line with the timelines given to the nodal agency.
2	5	<b>Amendment to Regulation 5.8 of the Principal Regulations</b>		
2.1	5.8 (vii) (c)	For a capacity up to 1000MW - Bank Guarantee of Rs. 10 lakh/ MW and for a capacity more than 1000MW - Bank Guarantee of Rs. 100 Crore plus Rs. 5 lakh/ MW for capacity over and above 1000MW, in lieu of ownership or lease rights or land use rights of land for 50% of the land required for the capacity for which Connectivity is sought subject to provisions of Regulations 11A and 11B of these regulations;	<b>Bank Guarantee of Rs. 5 lakh/ MW</b> , in lieu of ownership or lease rights or land use rights of land for 50% of the land required for the capacity for which Connectivity is sought subject to provisions of Regulations 11A and 11B of these regulations;	Developers are required to submit huge Performance Bank Guarantees in order to satisfy the financial requirements of the bids. This leads to a blockage of huge amount of capital of the developers which they may use in development of project. Hence to minimize the financial burden on the developers and to speedup the RE capacity addition in the country, it is requested to reduce the Land route BG.
2.2	5.8 (vii) (d)	Government Order issued by the concerned Government for allotment of the land along with possession documents for 100% of the land required for the capacity for which Connectivity is sought."	Government Order issued by the concerned Government for allotment of the land along with <b>land details</b> for 100% of the land required for the capacity for which Connectivity is sought."	To obtain the possession documents from the revenue departments/Government is a time-consuming process and it may take upto one year. Also if a developer have 50% of land is in possession, the developer can apply for connectivity under land route instead of GO route. Since the GOs issued by the State Governments is a credible proof for the land allotment, the requirement of land possession at the time of application may not be required. Further as the connectivity is granted on a first -cum- first serve basis, by the time the developers receive the possession documents, there is a likely chance that connectivity may not be available in developers preferred substation and all the efforts taken by the developer to get the possession documents will become redundant. In this regard, it is requested to consider only the GOs issued by the concerned Governments and not make the possession documents for the land allotted as a mandatory requirement at the time of application for grant of connectivity.
2.3	5.8 (xi) (c)	For a capacity up to 1000MW - Bank Guarantee of Rs. 10 lakh/ MW and for a capacity more than 1000MW - Bank Guarantee of Rs. 100 Crore plus Rs. 5 lakh/ MW for capacity over and above 1000MW, in lieu of ownership or lease rights or land use rights of land for 50% of the land required for the capacity for which Connectivity is sought subject to provisions of Regulations 11A and 11B of these regulations; or	<b>Bank Guarantee of Rs. 5 lakh/ MW</b> , in lieu of ownership or lease rights or land use rights of land for 50% of the land required for the capacity for which Connectivity is sought subject to provisions of Regulations 11A and 11B of these regulations; or	Developers are required to submit huge Performance Bank Guarantees in order to satisfy the financial requirements of the bids. This leads to a blockage of huge amount of capital of the developers which they may use in development of project. Hence to minimize the financial burden on the developers and to speedup the RE capacity addition in the country, it is requested to reduce the Land route BG.