

---

**Fwd: Fwd: Regarding suggestions /Comments on GNA Draft 2nd Amendment**

1 message

---

**Mukesh Kumar** <mukeshkr.cea@gov.in>  
To: uralsharma1995 <uralsharma1995@gmail.com>

Sat, Mar 9, 2024 at 7:32 PM

With Best Regards Mukesh Kumar Assistant Chief (Engg.) Central Electricity Regulatory Commission New Delhi - 110001 Contact- 23353503

----- Forwarded Message -----

From: Shilpa Agarwal <shilpa@cercind.gov.in>  
To: Mukesh Kumar <mukeshkr.cea@gov.in>, ramakant ece <ramakant.ece@gmail.com>, Awdhesh Kumar Yadav <awdhesh@nic.in>  
Sent: Sat, 09 Mar 2024 07:50:10 +0530 (IST)  
Subject: Fwd: Regarding suggestions /Comments on GNA Draft 2nd Amendment

----- Forwarded Message -----

From: Deepak Mathur <Deepak.Mathur@skeiron.com>  
To: Harpreet Singh Pruthi <secy@cercind.gov.in>  
Cc: Shilpa Agarwal <shilpa@cercind.gov.in>  
Sent: Fri, 08 Mar 2024 20:22:25 +0530 (IST)  
Subject: Regarding suggestions /Comments on GNA Draft 2nd Amendment

Dear Sir/ Madam,

With reference to the Public Notice of CERC inviting comments and suggestions on draft CERC (Connectivity and GNA) ISTS (2nd Amendment) Regulations, 2024, our comments / Suggestions are attached herewith for consideration please.

SL No.

Provision

Description

1

Proposed changes in 5.5 provision of GNA principal regulation

5.5 An Applicant, which is a Renewable Power Park Developer, shall apply for grant of Connectivity up to the quantum either in parts or full for which it has been authorized by the Central Government or a State Government as a Renewable Power Park developer.

Rationale

As you are aware, renewable power parks is critical for development of renewable energy projects and provides RE developers an area that is well characterized, with proper infrastructure and access to amenities and where the risk of the projects can be minimized.

You may appreciate the fact that cumulative capacity of park cannot be developed at once and would be done in phase manner. Further, Renewable energy park developer cannot apply for grant of connectivity for full quantum of park capacity without any upfront visibility of the timelines of completion of RE power projects to be developed inside the park. Hence, whenever there is a visibility towards the completion of RE power projects to be developed in the park, Renewable energy park developer needs to apply for connectivity.

Regulation 5.5 does not specifically provide that the connectivity by the Renewable Power Park Developer has to be sought for the entire allocated quantum at one go. Hence, in case Renewable energy park developer required to apply full connectivity application upfront at once go without any visibility on readiness of renewable energy power projects for which such connectivity applied, there would be chances of stranded capacity on account of mismatch between availability of transmission evacuation system and commissioning of power project.

Also, there could be instances wherein utilizing hybridization of solar/ wind components or installing ESS with solar/ wind components, the park developer may not need entire quantum of connectivity for the quantum allocated to park developer and in that case instructing park developer to apply connectivity for full quantum should not be recommended.

Considering above, it is requested to provide clarification order regarding submission of connectivity applications by park developer in a phased manner up to the capacity allocated to solar park.

2

Proposed changes in 15.3 provision of GNA principal regulation

Any person which acquires 51% or more shareholding of the company or its subsidiary or affiliate company owning REGS or part thereof in terms of Regulation 15.2, may after COD of such split part, apply to the Nodal Agency for transfer of Connectivity. The Nodal Agency shall issue revised grant of Connectivity on submission of applicable Conn-BG2 and Conn-BG3 by such person. The original grantee may substitute its Conn-BG2 and Conn-BG3 with revised Conn-BG2 and Conn-BG3, to be intimated by CTU. On issue of revised grant of Connectivity, such person shall enter into a fresh Connectivity Agreement and be responsible for compliance with all applicable regulations.

Provide that in case of revision in the corporate structure of any connectivity grantee company owning REGS or Renewable Park developer either in part or full, connectivity as well as the GNA along with corresponding liability equivalent to such asset under such revision in corporate structure, shall also be allowed to transfer same to the resultant entity which is a subsidiary of the Connectivity Grantee....

Rationale

In case of renewable energy park developers, there may be instances that park developers having connectivity may revise the corporate structure of the entity housing the existing RE park business into a different entity owing to business requirement or for any other corporate actions including entering in to IPP business viz. setting up of RE generating stations or other business which had not been envisaged at the time of conceiving the park business. Under such a scenario, there is an imperative need of allowing transfer of connectivity/GNA granted to renewable park developer to its own subsidiary.

In view of the above, it is requested to allow transfer of connectivity/GNA granted to renewable energy park developer to its subsidiary company getting onward control of the park business after any change in corporate structure.

With Warm Regards,

Deepak Mathur  
9810148062  
For Sarjan Realities Private Limited.

Ethics Helpline: For any concerns relating to Ethics and Compliance, contact our independent helpline at [skeiron@EthicalView.com](mailto:skeiron@EthicalView.com) or call us on 1800 210 6000 between 9.30 AM to 6.30 PM, Monday to Friday.

Disclaimer: This message and its attachments contain confidential information and may also contain legally privileged

information. This message is intended solely for the named addressee. If you are not the addressee indicated in this message (or authorized to receive for addressee), you may not copy or deliver any part of this message or its attachments to anyone or use any part of this message or its attachments. Rather, you should permanently delete this message and its attachments (and all copies) from your system and kindly notify the sender by reply e-mail. Any content of this message and its attachments that does not relate to the official business of the organization must not be construed that the same is sent or endorsed by the organization. No warranty is made that e-mail communications are free from computer virus or other defects.



**Suggestions\_omments on GNA Draft 2nd Amendment .docx**

26K

**SRPL comments and suggestions on draft CERC (Connectivity and GNA) ISTS (2nd Amendment) Regulations, 2024:**

SL No.	Provision	Description
1	<p>Proposed changes in 5.5 provision of GNA principal regulation</p> <p>Rationale</p>	<p>5.5 An Applicant, which is a Renewable Power Park Developer, shall apply for grant of Connectivity <b><u>up to the quantum</u></b> either in parts or full for which it has been authorized by the Central Government or a State Government as a Renewable Power Park developer.</p> <p>As you are aware, renewable power parks is critical for development of renewable energy projects and provides RE developers an area that is well characterized, with proper infrastructure and access to amenities and where the risk of the projects can be minimized.</p> <p>You may appreciate the fact that cumulative capacity of park cannot be developed at once and would be done in phase manner. Further, Renewable energy park developer cannot apply for grant of connectivity for full quantum of park capacity without any upfront visibility of the timelines of completion of RE power projects to be developed inside the park. Hence, whenever there is a visibility towards the completion of RE power projects to be developed in the park, Renewable energy park developer needs to apply for connectivity.</p> <p>Regulation 5.5 does not specifically provide that the connectivity by the Renewable Power Park Developer has to be sought for the entire allocated quantum at one go. Hence, in case Renewable energy park developer required to apply full connectivity application upfront at once go without any visibility on readiness of renewable energy power projects for which such connectivity applied, there would be chances of stranded capacity on account of mismatch between availability of transmission evacuation system and commissioning of power project.</p> <p>Also, there could be instances wherein utilizing hybridization of solar/ wind components or installing ESS with solar/ wind components, the park developer may not need entire quantum of connectivity for the quantum allocated to park developer and in that case instructing park developer to apply connectivity for full quantum should not be recommended.</p> <p>Considering above, it is requested to provide clarification order regarding submission of connectivity applications by park developer in a phased manner up to the capacity allocated to solar park.</p>
2	Proposed changes in 15.3 provision of GNA principal regulation	<p>Any person which acquires 51% or more shareholding of the company or its subsidiary or affiliate company owning REGS or part thereof in terms of Regulation 15.2, may after COD of such split part, apply to the Nodal Agency for transfer of Connectivity. The Nodal Agency shall issue revised grant of Connectivity on submission of applicable Conn-BG2 and Conn-BG3 by such person. The original grantee may substitute its Conn-BG2 and Conn-BG3 with revised Conn-BG2 and Conn-BG3, to be intimated by CTU. On issue of revised grant of Connectivity, such person shall enter into a fresh Connectivity Agreement and be responsible for compliance with all applicable regulations.</p>

		<p><b><u>Provide that in case of revision in the corporate structure of any connectivity grantee company owning REGS or Renewable Park developer either in part or full, connectivity as well as the GNA along with corresponding liability equivalent to such asset under such revision in corporate structure, shall also be allowed to transfer same to the resultant entity which is a subsidiary of the Connectivity Grantee....</u></b></p>
	Rationale	<p>In case of renewable energy park developers, there may be instances that park developers having connectivity may revise the corporate structure of the entity housing the existing RE park business into a different entity owing to business requirement or for any other corporate actions including entering in to IPP business viz. setting up of RE generating stations or other business which had not been envisaged at the time of conceiving the park business. Under such a scenario, there is an imperative need of allowing transfer of connectivity/GNA granted to renewable park developer to its own subsidiary.</p> <p>In view of the above, it is requested to allow transfer of connectivity/GNA granted to renewable energy park developer to its subsidiary company getting onward control of the park business after any change in corporate structure.</p>