

**CENTRAL ELECTRICITY REGULATORY COMMISSION
NEW DELHI**

Petition No. 202/MP/2023

Subject : Petition under Section 79(1)(b) &(f) of the Electricity Act, 2003 read with Regulation 111 of the Central Electricity Regulatory Commission (Conduct of Business) Regulations, 1999 and Article 12 of Power Purchase Agreement dated 8.12.2021 seeking Working Group Report 2022 as Change in Law Event.

Petitioner : TP Saurya Limited (TPSL)

Respondents : Kerala State Electricity Board Limited (KSEBL) and Ors.

Petition No. 272/MP/2023

Subject : Petition under section 79(1)(a) & (f) of the Electricity Act, 2003, read with regulation 111 of the Central Electricity Regulatory Commission (Conduct of Business) Regulations, 1999 and article 12 of the power purchase agreement seeking Working Group Report, 2022 as a Change in Law event.

Petitioner : NTPC Limited (NTPC)

Respondents : Uttar Pradesh Power Corporation Limited (UPPCL) and Ors.

Petition No. 286/MP/2023

Subject : Petition under Section 79 of the Electricity Act, 2003 read with appropriate provisions of applicable law inter-alia seeking extension of time to comply with the directions of the Respondent No. 2 to install the required reactive power compensation device for the Petitioner's 300 MW solar power project situated at Village: Sonanda, Shekhasar, Bandhari, and Kesarpura, Tehsil Bap, District Jodhpur, Rajasthan; and consequently, restrain the Respondent No. 2 from taking coercive action against the Petitioner till such time.

Petitioner : Azure Power Maple Private Limited (APMPL)

Respondents : Northern Regional Load Despatch Centre (NRLDC) and Ors

Petition No. 335/MP/2023

Subject : Petition under section 79(1)(a) & (f) of the electricity act, 2003 read with regulation 111 of the Central Electricity Regulatory Commission (Conduct of Business) Regulations, 1999 and Article 10 of the Power Usage Agreements seeking Working Group Report, 2022 as Change in Law event.

Petitioner : NTPC Limited (NTPC)
Respondents : Southern Power Distribution Co. of Telangana Ltd. and Ors.

Petition No. 16/MP/2024

Subject : Petition under Section 79(1)(b) & (f) of the Electricity Act, 2003 read with Regulation 111 of the Central Electricity Regulatory Commission (Conduct of Business) Regulations, 1999 and Article 12 of the Power Purchase Agreement dated 30.10.2019 executed between the Petitioner and Solar Energy Corporation of India ("SECI"/Respondent No. 1") seeking declaration of the 'Report of the Working Group in respect of Data Submission Procedure and Verification of Compliance to CEA Regulation on Technical Standards for Connectivity to the Grid by RE Generators' ("Working Group Report, 2022") issued by the Central Electricity Authority as a Change in Law Event, and consequently devise an appropriate mechanism for compensation to the Petitioner along with carrying costs and interest on carrying cost.

Petitioner : Ostro Kannada Power Private Limited (OKPPL)
Respondents : Solar Energy Corporation of India Limited (SECI) and Ors

Petition No. 40/MP/2024

Subject : Petition under Section 79 of the Electricity Act, 2003 read with Article 12.2 (Change in Law) of the Power Purchase Agreements dated 21.07.2017 executed for the development of 50 MW ISTS connected wind project between Adani Wind Energy Kutchh One Limited [Formerly known as Adani Green Energy (MP) Limited] and PTC India Limited, seeking relief for the additional expenditure incurred due to occurrence of Change in Law event.

Petitioner : Adani Wind Energy Kutchh One Ltd. (AWEKOL)
Respondents : PTC India Limited (PTCIL) and Ors.

Petition No. 81/MP/2024

Subject : Petition under Section 79 of the Electricity Act, 2003 read with Article 12.2 of the Power Purchase Agreement dated 29.12.2017 for the development of 50 MW ISTS connected wind project between Adani Wind Energy Kutchh One Limited [Formerly known as Adani Green Energy (MP) Limited] and Solar Corporation of India Limited seeking reliefs for the additional expenditure incurred due to occurrence of Change in Law event.

Petitioner : Adani Wind Energy Kutchh One Ltd. (AWEKOL)
Respondents : Solar Energy Corporation of India Limited (SECI) and Ors.

Petition No. 82/MP/2024

Subject : Petition under Section 79 of the Electricity Act, 2003 read with Article 12.2 of the Power Purchase Agreements dated 25.10.2019 for the development of 250 MW ISTS connected wind project between Adani Wind Energy Kutchh Three Limited [Formerly known as Adani Green Energy Three Limited] and Solar Energy Corporation of India Ltd. seeking reliefs for the additional expenditure incurred due to occurrence of Change in Law event.

Petitioner : Adani Wind Energy Kutchh Three Ltd. (AWEKTL)

Respondents : Solar Energy Corporation of India Limited (SECI) and Ors.

Petition No. 25/MP/2024

Subject : Petition under section 79(1)(a) & (f) of the Electricity act, 2003 read with Regulation 111 of the Central Electricity Regulatory Commission (Conduct of Business) Regulations, 1999 and Article 10 of the Power Usage Agreements seeking Working Group Report, 2022 as Change in Law Event.

Petitioner : NTPC Green Energy Limited (NGEL)

Respondents : Southern Power Distribution Co. of Telangana Limited and Ors.

Petition No. 43/MP/2024

Subject : Petition under Section 79 of the Electricity Act, 2003 read with Article 12.2 of the Power Purchase Agreement dated 19.11.2019 entered between Adani Wind Energy Kutchh Five Limited (formerly known as Adani Green Energy Five Limited) and Solar Energy Corporation of India Ltd. seeking reliefs for the additional expenditure incurred due to occurrence of Change in Law event.

Petitioner : Adani Wind Energy Kutchh Five Limited (AWEKFL)

Respondents : Solar Energy Corporation of India Limited and Ors.

Petition No. 49/MP/2024

Subject : Petition under Section 79 of the Electricity Act, 2003; read with applicable provisions of Power Purchase Agreement dated 14.09.2021 executed between the Petitioner and the Respondent No. 1 and the relevant provisions of the applicable law inter alia seeking Change in Law claims with respect to the mandate of installing reactive power compensation devices for the Petitioner's 300 MW Wind Power Project in Gadag, Karnataka and reliefs for seeking extension of time to comply with the aforesaid requirements.

Petitioner : Ayana Renewable Power Six Private Limited (ARPSPL)
Respondents : Solar Energy Corporation of India Limited and Ors.

Petition No. 57/MP/2024

Subject : Petition under Section 79(1)(b) and (f) of the Electricity Act, 2003 read with Regulation 111 of the Central Electricity Regulatory Commission (Conduct of Business) Regulations, 1999 and Article 12 of Power Purchase Agreement dated 21.10.2016 seeking in-principle approval of the occurrence of Change in Law events, i.e., issuance of the Central Electricity Authority (Technical Standards for Connectivity to the Grid) (Amendment) Regulations, 2019 and the Working Group Report, 2022.

Petitioner : Tata Power Renewable Energy Limited (TPREL)
Respondents : Solar Energy Corporation of India Limited and Ors.

Petition No. 139/MP/2024

Subject : Petition under Section 79(1)(b) and (f) of the Electricity Act, 2003 read with Regulation 65 of the CERC (Conduct of Business) Regulations, 2023 and Article 17 of Power Purchase Agreements dated 25.11.2021 seeking in-principle approval of the occurrence of Change in Law event, i.e., issuance of the Working Group Report, 2022.

Petitioner : Talettutayi Solar Projects Nine Private Limited (TSPNPL)
Respondents : M. P Power Management Co. Limited and Ors.

Petition No. 334/MP/2024

Subject : Petition under Section 79(1)(b) and 79(1)(f) of the Electricity Act, 2003 read with the Central Electricity Regulatory Commission (Conduct of Business) Regulations, 2023 and Article 12 of the Power Purchase Agreement dated 14.6.2022 seeking in-principle declaration that the Working Group Report, 2022 is a Change in Law event and grant of consequential reliefs thereto.

Petitioner : ReNew Surya Aayan Private Limited (RSAPL)
Respondents : Solar Energy Corporation of India Limited (SECI) and Ors.

Petition No. 121/MP/2024

Subject : Petition under Section 79 of the Electricity Act, 2003 and Article 12.2 of the Power Purchase Agreement dated 20.08.2019 for the development of 300 MW (reduced to 150 MW) ISTS connected Solar

power project entered between Adani Solar Energy Jaisalmer Two Private Limited (formerly known as SBSR Power Cleantech Eleven Private Limited) and Solar Energy Corporation of India Ltd., read with Electricity (Timely Recovery of Costs due to Change in Law) Rules, 2021, seeking a declaration that the Report of the Working Group issued in July, 2022 constitutes as a Change in Law event and consequent reliefs qua allowance of the additional expenditure incurred towards such Change in Law event.

Petitioner : Solar Energy Jaisalmer Two Private Limited (SEJTPL)

Respondents : Solar Energy Corporation of India Limited (SECI) and Ors.

Petition No. 124/MP/2024

Subject : Petition under Section 79(1)(b),(c) & (f) of the Electricity Act, 2003 read with Regulation 111 of the Central Electricity Regulatory Commission (Conduct of Business) Regulations, 1999, Clause 8.5.3 of the Competitive Bidding Guidelines, 2020 and Article 12 of Power Purchase Agreement dated 31.03.2023 seeking in principle approval of introduction of the Working Group Report, 2022 and the amendments brought to the Project Import Regulation, 1986 by the Notifications dated 19.10.2022 and 01.02.2023 as a Change in Law Event.

Petitioner : TP Saurya Limited (TPSL)

Respondents : Solar Energy Corporation of India Limited (SECI) and Ors.

Petition No. 142/MP/2024

Subject : Petition under Section 79(1)(b) and (f) of the Electricity Act, 2003 read with Regulation 65 of the Central Electricity Regulatory Commission (Conduct of Business) Regulations, 2023 and Article 12 of Power Purchase Agreements dated 28.6.2016 and 4.11.2017 seeking in principle approval of occurrence of Change in Law event i.e. Issuance of Central Electricity Authority (Technical Standards for Connectivity to the Grid) (Amendment) Regulations, 2019 and the Working Group Report, 2022.

Petitioner : Tata Power Renewable Energy Limited (TPREL)

Respondents : NTPC Limited (SECI) and Ors

Petition No. 195/MP/2024

Subject : Petition under Section 79(1)(b) and (f) of the Electricity Act, 2003 read with Regulation 65 of the Central Electricity Regulatory Commission (Conduct of Business) Regulations, 2023 and Article 17 of Power Purchase Agreements seeking in principle approval of occurrence of

Change in Law event i.e. Issuance of the Working Group Report, 2022.

Petitioner : TP Saurya Limited (TPSL)

Respondents : Rewa Ultra Mega Solar Limited and Ors.

Petition No.236/MP/2023

Subject : Petition under Section 79 of the Electricity Act, 2003 read with Articles 12.2 of the Power Purchase Agreement dated 16.12.2019 for supply of 324.4 MW wind energy-based power entered between Adani Wind Energy MP One Pvt. Ltd. and Solar Energy Corporation of India Ltd. seeking Change in Law compensation along with Carrying Cost.

Petitioner : Adani Wind Energy MP One Private Limited (AWEMOPL)

Respondents : Solar Energy Corporation of India Ltd. & Ors.

Petition No. 98/MP/2024

Subject : Petition under Section 79 of the Electricity Act, 2003 read with Article 9.2 of the Power Purchase Agreements dated 17.07.2018 for the development of 75 MW ISTS connected wind project between Adani Wind Energy Kutchh Six Limited [Formerly known as Adani Renewable Energy (GJ) Limited] and Maharashtra State Electricity Distribution Company Limited seeking reliefs for the additional expenditure incurred due to occurrence of Change in Law event.

Petitioner : Adani Wind Energy Kutchh Six Limited (AWEKSL)

Respondents : Maharashtra State Electricity Distribution Co. Ltd. (MSEDCL)

Date of Hearing : **16.1.2025**

Coram : Shri Jishnu Barua, Chairperson
Shri Ramesh Babu V., Member
Shri Harish Dudani, Member

Parties Present : Shri Venkatesh, Advocate, TPSL, NTPC, NGEL, TPREL, TSPNPL
Shri Suhael Buttan, Advocate, TPSL, NTPC, NGEL, TPREL, TSPNPL
Ms. Priya Dhankar, Advocate, TPSL, NTPC, NGEL, TPREL, TSPNPL
Shri N. Bhatnagar, Advocate, TPSL, NTPC, NGEL, TPREL, TSPNPL
Ms. Drishti Rathi, Advocate, TPSL, NTPC, NGEL, TPREL, TSPNPL
Shri Aniket Prasoon, Advocate, APMPL, ARPSPL
Shri Adarsh Bhardwaj, Advocate, APMPL, ARPSPL
Ms. Archita Kashyap, Advocate, APMPL, ARPSPL
Ms. Mannat Waraich, Advocate, OKPPL, RSAPL

Shri Mridul Gupta, Advocate, OKPPL, RSAPL
Shri Ashabari Thakur, Advocate, OKPPL, RSAPL
Shri Amit Kapur, Advocate, AWEKOL, AWEKFL, AWEMOPL
Shri Poonam Sengupta, Advocate, AWEKOL, AWEKFL, AWEMOPL
Ms. Sakshi Kapoor, Advocate, AWEKOL, AWEKFL, AWEMOPL
Shri Pradyumn Sharma, Advocate, AWEKOL, AWEKFL, AWEMOPL
Shri Saunak Rajguru, Advocate, AWEMOPL
Shri Hemant Singh, Advocate, SEJTPL
Shri Lakshyajit, Advocate, SEJTPL
Shri Harshit Singh, Advocate, SEJTPL
Shri Arijit Maitra, Advocate, BYPL
Shri Prabhas Bajaj, Advocate, KSEBL
Shri Rithvik Mathur, Advocate, KSEBL
Shri Aditya Singh, Advocate, UPPCL
Shri Divyansh Singh, Advocate, UPPCL
Shri Gaurav Dudeja, Advocate, UPPCL
Ms. Anumeha Smiti, Advocate, UPPCL
Shri Nishant Thakur, Advocate, UPPCL
Shri Ravi Kishore, Advocate, PTC
Shri Keshav Singh, Advocate, PTC
Shri Hitendra, Advocate, GRIDCO
Ms. Laxmi, Advocate, GRIDCO
Shri D. Abhinav Rao, Advocate, Telangana Discoms
Shri Rahul Jajoo, Advocate, Telangana Discoms
Ms. Pragya Gupta, Advocate, AP Discoms
Ms. Nishtha Goel, Advocate, AP Discoms
Shri Anand Ganesan, Advocate, RUVITL
Shri Amal Nair, Advocate, RUVITL
Ms. Shivani Verma, Advocate, RUVITL
Shri M.G. Ramachandran, Sr. Advocate, CTUIL
Shri Shubham Arya, Advocate, CTUIL
Ms. Poorva Saigal, Advocate, CTUIL
Ms. Pallavi Saigal, Advocate, CTUIL
Shri Rishabh Saxena, Advocate, CTUIL
Shri Harshvardhan, Advocate, CTUIL
Ms. Shikha Ohri, Advocate, SECI
Shri Kartik Sharma, Advocate, SECI
Ms. Mandakini Ghosh, Advocate, SECI
Shri Rahul Ranjan, Advocate, SECI
Shri Nitin Gaur, Advocate, MPPMCL
Shri Sagar, Advocate, MPPMCL
Shri Swapnil Verma, CTUIL
Shri Ranjeet Rajput, CTUIL
Shri Rahul Shukla, NLDC
Shri Gajendra Sinh, NLDC
Shri Alok Mishra, NLDC
Shri Prashant Garg, NLDC
Shri Asif, NLDC
Shri Anuj Bhave, WRLDC
Ms. Shreya Jad, NPCL

Shri Shantanu Singh, Tata Power
Record of Proceedings

Since all these Petitions involved a common issue, *i.e.*, whether the Working Group Report 2022 constitutes a Change in Law event under the Power Purchase Agreement(s), they were taken up together for the hearing.

2. Learned counsel for the Petitioners submitted that the Petitioners therein have filed the compliance affidavit with respect to the Record of Proceedings for the hearings dated 28.10.2024 and 6.11.2024. They further submitted that the common issue involved in these Petitions is whether the Working Group Report 2022 constitutes a Change in Law event under the Power Purchase Agreement(s) or not.

3. The Commission observed that out of total of 28 Petitions related to the declaration of the Working Group Report as a Change in Law, four Petitions (*i.e.*, Petition Nos. 124/MP/2024, 153/MP/2024, 40/MP/2024 and 236/MP/2023) are relating to declaration of the Ministry of Finance's notifications regarding GST and Custom Duty as a Change in Law. The Commission further observed that in the first instance, the Commission should deal with the common issue, *i.e.*, the declaration of Working Group Report as Change in Law, and thereafter, other issues shall be dealt with, and accordingly, all the Petitions, which have been taken up in today's hearing, shall be clubbed together. The learned counsel for the Petitioner in Petition No. 153/MP/2023 specifically requested not to club Petition No. 153/MP/2023 with the other matters. Accordingly, the Commission directed to list the Petition No. 153/MP/2023 separately. The learned counsels for the Petitioners suggested that once a common issue is decided in batch Petitions, Orders in Petitions involving other issues, such as GST and Custom duty, etc. may be issued considering all the issues.

4. The representative of the Grid Controller of India Limited (GCIL) submitted that GCIL has also filed its affidavit dated 2.12.2024 indicating the Project-wise compliance status of the Reactive Power Compensation devices. He mainly further submitted as under:

(i) Regulation B2(1) of the CEA (Technical Standards for Connectivity to the Grid) Regulations, 2007, as introduced by the First Amendment dated 15.10.2013, clearly provided that the generating station shall be capable of supplying dynamically varying reactive power support so as to maintain the power factor within limits of the 0.95 lagging to 0.95 leading.

(ii) Since the capacitor banks are only static reactive compensation devices, the generating stations will not be able to supply the dynamically varying reactive power support by merely installing the capacitor banks. For providing the dynamically varying reactive power support, the generators have to install the dynamic reactive compensation devices such as the additional inverters, SVG, etc.

(iii) Inverters are also a source of dynamic reactive power. Inverters have the inherent capability to provide dynamic reactive support. If the inverters are not capable due to some constraints, such as the current limiting constraint, they can supply the dynamic reactive support via other dynamic devices like SVGs, STATCOMS, etc.

(iv) However, based on the representations made by certain developers, the CEA had directed that the hybrid reactive compensation can be permitted on a case-to-case basis for issuance of the connection offer to the applicants who made their CON-4 application till 30th April 2023, after which the dynamic compensation shall only be permitted. Based on the approval of the CEA on a case-to-case basis, certain developers have been permitted to allow the commissioning of their Projects with the installation of capacitor banks also.

(v) The CEA (Technical Standards for Connectivity to the Grid) Regulations, 2007 also required the developers to take into the effect the temperature extremes in the design of their machines.

(vi) The Working Group Report, 2022, did not provide any new requirements and merely provided the clarifications to the CEA's Technical Standards for the connectivity to the Grid Regulations to facilitate the RE generators to comply with the said Regulations.

(vii) In fact, CEA has also submitted that the Working Group Report, 2022 merely facilitates the RE developers to understand the procedure for the Data Submissions & Verification of Compliance of CEA's Technical Standard Regulations and should not be treated as any change/amendment to the said Regulations.

5. In response to the query of the Commission regarding compliances carried out before the issuance of the Working Group Report, 2022, the representative of GCIL submitted that only after 2019 did the ISTS-connected RE Generators start coming up. Further, on 14.7.2021, a meeting was also held to discuss the reactive power requirement from the RE Generation Sources in accordance with CEA's Regulations wherein it was decided that the grant of the connectivity and FTC be allowed subject to confirmation by the generator to comply with the CEA Regulations. Accordingly, these RE generators have also given an undertaking to comply with the CEA's Regulations.

6. *Per contra*, the learned counsel for the Petitioner in Petition No. 202/MP/2023 submitted that perusal of the Minutes of Meeting held on 28.5.2021 itself indicates that there was a lack of common understanding among CEA, CTUIL, and POSOCO for the implementation of the CEA Technical Regulations vis-à-vis RE generators. Learned counsel further submitted that as per Regulation B2(1), the generating stations must be capable of supplying dynamically varying reactive power support so as to maintain the power factor "within" the limits of 0.95, lagging to 0.95 leading. Thus, the generating company was mandated to operate within the V-curve boundaries or limits. However, in terms of the Working Group Report, 2022, the generating company is mandated to operate at least up to V-curve boundaries. He added that Regulation B2(1) did not provide that the generating station's capability to supply the dynamically varying reactive power is to be measured 'at the rated output'.

7. In response, the representative of GCIL submitted that since the year 2013, CEA standards have been very clear that the generating station shall be capable of supplying dynamically varying reactive power support. However, the generating stations started asking for detailed clarifications time and again from the year 2019, when GCIL published its first-time charging procedure and started asking for the compliance thereof.

8. In response to the Commission's query as to how many plants are non-compliant as per the details filed by GCIL, the representative of GCIL sought time to furnish the details and submitted that the generating Station covered under Petition No. 286/MP/2023 is non-compliant. The response to the Commission's further query whether GCIL has restricted the scheduling of the generator (in Petition No. 286/MP/2023) of 300 MW to 276 MW, the representative of GCIL submitted that the CEA has specified in the minutes that only that capacity, which is compliant with, shall be allowed FTC. Right now, the generator is compliant with for 276 MW only. Accordingly, its schedule is restricted to 276 MW.

9. In response to the another specific query of the Commission regarding supply of reactive power by reducing the rated active power, the representative of GCIL submitted that

it cannot be said to be compliant with the requirement of Regulation B2(1) of the CEA (Technical Standards for Connectivity to the Grid) Regulations, 2013 which states that the generating station shall be capable of supplying the dynamically varying reactive power support so as to maintain the power factor within the limits of .95 lagging to .95 leading. If some plants are getting connected with the grid, i.e., 300 MW capacity, and at certain points of time, such plants say that it will reduce the active power immediately to provide the reactive support that may not be helpful because in such cases, GCIL needs to be sure about the generation resources which are on bar so as to meet the load generation balance.

10. On the query of the Commission as to whether it is technically enough to install only the static reactive power compensation devices such as capacitor bank, the representative of the GCIL submitted that technically that is not enough. CEA, vide its letter dated 12.5.2023 clearly mentioned that the RE developers who have applied connectivity till 30th April 2023, have must comply with the requirements stipulated in the CEA technical standards for connectivity to the Grid Regulations by 30th September 2023. The said letter was issued after giving some relaxations earlier.

11. The Commission enquired regarding the difference in cost of the capacitors vs. some dynamic compensation device. In response, the learned counsel for the Petitioner in Petition No. 202/MP/2023 submitted that based on the quantum of generation of each project, the compensation device would vary for 50 MW is much less as compared to a 750 MW project. The Regulation provides that it is a requirement to operate within the V curve. Now up to 2021, each generator could reduce their active generation to be within the V curve. The question, which occurred in May of 2021, was when you say 'within' whether it is to be inside the V curve or at the top of the V curve. The Committee finally deliberated on this point and said that the grid would be best supported if the reactive power is provided at the top of the V curve. At the rated output this is the change.

12. The representative of GCIL submitted that standards are made in the spirit of making grid operation reliable. The standards were so prescribed that the devices should have dynamically varying reactive power support to maintain power factor. Regulations do not provide for the installation of any static devices. For example, it will provide only 50 MVAR support or only 20 MVAR support. GCIL needs dynamically varying reactive power support devices. There is an operational requirement for dynamic compensation.

13. Learned senior counsel for CTUIL submitted that CTUIL has also filed its compliance affidavit in Petition No.202/MP/2023.

14. Also, during the course of hearing, it was also pointed out that GCIL and CTUIL have filed their respective affidavits only in Petition No. 202/MP/2023, and the Petitioners and the Respondents in the other cases are not privy to the Pleadings of the said case. In response, learned counsel for the Petitioner in Petition No. 202/MP/2023 assured that the pleadings of the said case, particularly the replies of CEA, CTUIL, and GCIL, will be provided to the parties in the other cases. The learned senior counsel for CTUIL also submitted that CTUIL will share the affidavit in all other cases.

15. The learned counsels for the Respondents sought liberty to file their respective replies to the Petition(s) as well as the additional information furnished by the Petitioners therein.

16. Considering the submissions of the parties, the Commission directed the parties to furnish the following details/information on an affidavit within three weeks:

(A) The Petitioners to submit the following information in an affidavit:

(i) How does the “Report of the working group” constitute a Change in Law?

(ii) The details of the additional equipments installed for meeting the new requirements as per the Working Group Report 2022, which is being claimed by the Petitioners as Change in Law as per the below table:

Sl. No.	Petition No.	Plant Capacity (in MW)	Bid cut off date	SCOD	Date of FTC approval by Grid-India	COD	The equipment installed / planned be installed prior to the issuance of the working group report	Additional equipments installed/ proposed to be installed after the effectiveness of the working group report for which the change in law claim is raised

(iii) The Petitioner(s) are seeking a declaration of the Report of the Working Group in the month of July 2022 as a Change in Law event on account of issues such as Point of Interconnection, Designing considering ± 1 degree, rated reactive power at rated output, and capability to operate at least up to ‘V Curve.’ The Petitioners to furnish the increase in reactive power capabilities on each such parameters prior to the working group report vs. after the working group report as per the below table:

Sl. No.	Parameter	Maximum Reactive Power Capability (in MVar) prior to working group report	Maximum Reactive Power Capability (in MVar) after to working group report
1	Point of Interconnection (Pol) will be the ‘point of reference’ for the assessment of compliance to CEA Regulations.		
2	Requirement to demonstrate dynamic reactive power capability to operate at least up to ‘V Curve’ boundaries (0.95 lag/lead).		
3	Requirement of designing the generating station considering 1°C margin over the maximum and minimum possible ambient temperature		
4	Generating Station should be able to deliver rated Reactive Power at ‘rated output’		

(iv) Whether the Petitioners have given any undertaking to the GCIL for compliance with the CEA Regulations. If yes, a copy of the same may be submitted, if not filed with the Petition.

(B) GCIL to file the following information on an affidavit with a copy to the other side:

(i) Detail of all the RE generators who have declared COD and were also complying with the requirements as per the CEA (Technical Standards for Connectivity to the Grid) Regulations, 2007, even before the issuance of the working group report 2022.

(ii) GCIL, during the course of the hearing, submitted that it had considered reactive power compliance with capacitor bank, hybrid, and dynamic compensation for the RE generators during the different time periods. GCIL to clarify the details of considering each type of compliance, its time period, and the basis of consideration of such compliance (letter, MoM, Regulations, or any other document)

(iii) Furnish the information as per the below table:

Category of the RE Generator*	
Particulars	
Compliance requirements being considered by the Grid-India /RLDCs for meeting the reactive power compensation (Dynamic/ Static/ Hybrid)	
Basis of adoption of above criteria for being compliant (Regulations/ WGR 2022/ any MoM/ Letters etc.)	
Petitions covered under the above category (Petition No. and Petitioner)	

*The broad category of the generator can be (i) the generators who declared COD before the working group report (ii) the generators who declared COD after the working group report, and (iii) the generators who are at connectivity approval/ processing stage, etc.

(iv) The Petitioners, in their submissions, stated that before the effectiveness of the working group report, they were complying with the reactive power capability requirement as per the relevant CEA Regulations by way of changing the active power output. GCIL to clarify whether meeting the requirement of reactive power capability requirement in such a way was permissible as per the CEA Regulations.

(v) How many Petitioners have submitted the undertaking for compliance with the CEA (Technical Standards for Connectivity to the Grid) Regulations, 2007 working group report? The details of the Petitioners, along with the compliance status of the undertaking given by the respective petitioners and a copy of the undertakings, may be submitted.

(C) The Petitioner in Petition No. 286/MP/2023 is directed to submit the following:

- (i) The information sought vide RoP for the hearing dated 28.10.2024.
- (ii) The following information, along with the relevant supporting documents:

RE Plant Particulars						
Project Details	Project Name					
	Capacity (in MW)					
	Bid Cut-Off Date					
	SCOD					
	COD (date-wise with capacity declared COD)					
	Technology (Solar/Wind/Hybrid)					
	Project Location					
Nearest IMD Station						
Design Parameters						
RE plant Particulars			As per CEA Regulations 2007 & Amendments	Considered while bidding	Parameters after Working Group Report, 2022	Corresponding clause of applicable CEA regulation and WGR
Point of Reference						
Point of Interconnection (POI)						
Ambient Temperature considered	Temperature (°C)					
	Basis for consideration of such temperature					
Temperature extreme considered	Temperature (°C)					
	Basis for consideration of such temperature					
Rated active power at ambient and at extreme temperature						
Reactive power capability at Rated active output at ambient and at extreme temperature						
Reactive Power Capability* at temperature	Dynamic*	Capacity (MVar)				
		Equipments\$				
	Static	Capacity				
		Equipments\$				
Particular			Considered while bidding	Post WGR Report 2022		
Financial implication against Reactive Power equipments (Copy of Purchase Orders to be enclosed, where placed) in Rs crore	Towards installation of Dynamic compensation devices					
	Towards installation of Static compensation devices					
Date of submission of Reactive Power study report to CTUIL/ concerned RLDC #						
Status of Compliance to Reactive Power Capability (compliant/ noncompliant)						
* Provide supporting study report, showing required MVar capability.						
\$ Reactive Power support equipment's planned to be installed before Working Group Report, 20220 and additional equipment's installed/ planned to be installed after the working group report, and financial impact thereof.						

Detailed Study Report to be submitted

(D) The Petitioners in Petition Nos. 121/MP/2024 and 334/MP/2024 are directed to file on an affidavit the information sought at Para No. 3(a) to 3(c) of RoP for the hearing dated 28.10.2024.

(E) The Petitioners in Petition Nos. 272/MP/2023 and 335/MP/2023 are directed to implead the GCIL and CTUIL as a party to the present Petition and to file the revised memo of parties.

(F) The Respondents to file their respective replies to the Petition and the additional information furnished / to be furnished by the Petitioners as above within three weeks with a copy to the Petitioners, who may file their rejoinder(s), within three weeks thereafter.

(g) As noted above, the Petitioner in Petition No. 202/MP/2023 will ensure that a copy of their Pleadings is provided to all the relevant concerned parties.

17. The Petitions will be listed for the hearing on **21.3.2025**.

By order of the Commission
Sd/-
(T.D. Pant)
Joint Chief (Law)