

**CENTRAL ELECTRICITY REGULATORY COMMISSION
NEW DELHI**

Petition No.323/MP/2025

Subject : Petition under Section 79(1)(a) and (f) of the Electricity Act, 2003 and Article 9 of the Power Purchase Agreement dated 3.1.2022 seeking Working Group Report, 2022 as a Change in Law event.

Petitioner : SJVN Limited (SJVN)

Respondents : Gujarat Urja Vikas Nigam Limited (GUVNL) and Ors.

Petition No.333/MP/2025

Subject : Petition under Section 79 (1)(a) and Section 79(1)(f) of the Electricity Act, 2003 read with Regulation 65 of the CERC (Conduct of Business) Regulations, 2023 and Article 12 of Power Purchase Agreement dated 24.08.2023 seeking declaration of the working group report, 2022 as a Change in Law Event and Consequential Determination of quantum and Mechanism of Compensation on Account of Change in Law Event.

Petitioner : NTPC Limited (NTPC)

Respondents : Kerala State Electricity Board Limited and Ors.

Date of Hearing : **29.4.2025**

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

Parties Present : Ms. Anushree Bardhan, Advocate, SJVN
Ms. Ritika Singh, Advocate, SJVN
Shri Ajay Gupta, SJVN
Shri Venkatesh, Advocate, NTPC
Ms. Priya Dhankhar, Advocate, NTPC
Shri Abhishek Nangia, Advocate, NTPC
Shri Nikunj Bhatnagar, Advocate, NTPC
Ms. Drishti Rathi, Advocate, NTPC
Shri Anand Ganesan, Advocate, GUVNL
Shri Parth Bhalla, Advocate, GUVNL
Shri Utkarsh Singh, Advocate, GUVNL
Shri Shubham Arya, Advocate, CTUIL
Ms. Pallavi Saigal, Advocate, CTUIL
Shri Rishabh Saxena, Advocate, CTUIL
Shri Ranjeet Singh Rajput, CTUIL
Shri Lashit Sharma, CTUIL
Shri Gajendra Singh, NLDC
Shri Rahul Shukla, NLDC



Record of Proceedings

Learned counsel for the Petitioners submitted that the present Petitions have been filed *inter alia* seeking a declaration that the Working Group Report, 2022, constitutes a Change in Law event under the respective Power Purchase Agreements.

2. Considering the submissions made by the learned counsels for the Petitioners, the Commission directed as under:

(a) In Petition No. 323/MP/2025, the Petitioner is to implead Grid Controller of India Limited (GCIL) as a party to the Petition and file a revised memo of parties within a week.

(b) Admit and issue notice to the Respondents, subject to just exceptions;

(c) The Respondents to file their respective replies, if any, within three weeks with a copy to the Petitioner, who may file its rejoinder, if any, within three weeks thereafter.

(d) The Petitioners are directed to furnish the following information and/or clarification, on an affidavit, within three weeks, with a copy to the Respondents:

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

(ii) Information as per the table below with the relevant supporting documents:

| RE Plant Particulars | | | | | |
|-----------------------------|--|---------------------------------|--|--|--|
| Project Details | Project Name: | | | | |
| | Capacity (in MW): | | | | |
| | Bid Cut-Off Date: | | | | |
| | SCOD: | | | | |
| | COD (date-wise capacity declared COD): | | | | |
| | Technology (Solar/ Wind/ Hybrid): | | | | |
| | Project Location: | | | | |
| | Nearest IMD Station: | Name: | Distance from project (KMs): | | |
| | Design Parameters | | | | |
| Particulars | | Considered while bidding | Corresponding CEA Regulations 2007 & Amendments | Considered after the Working Group Report, 2022 | Corresponding clause of CEA Regulations and WGR |
| Point of Reference: | | | | | |



| | | | | | | |
|--|--|--------------------------|--------------------------|--|----------------------|--|
| Point of Interconnection (POI): | | | | | | |
| Ambient Temperature | Temperature (°C) | | | | | |
| | Basis for consideration of such temperature | | | | | |
| Temperature extreme considered | Temperature (°C) | | | | | |
| | Basis for consideration of such temperature | | | | | |
| Rated active power output | At ambient temperature | | | | | |
| | At extreme temperatures | | | | | |
| Reactive power capability at the Rated active output | At ambient temperature | | | | | |
| | At extreme temperatures | | | | | |
| Reactive Power Capability at design temperature (...degrees) | Dynamic* | Capacity (MVar) | | | | |
| | | Equipments ^{\$} | | | | |
| | Static | Capacity | | | | |
| | | Equipments ^{\$} | | | | |
| Particulars | | | Considered while bidding | | Post WGR Report 2022 | |
| Financial implication against Reactive Power equipments (Copy of Purchase Orders to be enclosed, where placed) (in Rs crores) | 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 a supporting study report, showing the required MVar capability. | | | | | | |
| \$ Reactive Power support equipment is planned to be installed before the Working Group Report, 2022, and additional equipment is installed/ planned to be installed after the working group report, and the financial impact thereof. | | | | | | |
| # Detailed Study Report pre and post WGR 2022 to be submitted | | | | | | |

(iii) 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 a Change in Law as per the table below:

| Project Name | 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 issuance of the working group report for which a change in law claim is raised |
|--------------|------------------------|------------------|------|------------------------------------|-----|--|---|
| | | | | | | | |

(iv) The Petitioner is seeking declaration of the Report of the Working Group in July 2022 as a Change in Law event on account of issues such as Point of Interconnection, design the generating station, rated reactive power at rated active power output and capability to operate at least up to 'V Curve'. Furnish the increase in reactive power capability (in MVAR) on each such parameter, prior to the working group report vs. after the working group report, as per the table below:

| Sl. No. | Parameter | Maximum Reactive Power Capability (in MVAR) prior to the working group report | Maximum Reactive Power Capability (in MVAR) after the working group report |
|---------|--|---|--|
| 1 | Point of Interconnection (PoI) will be the 'point of reference' for the assessment of compliance with 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 temperature extremes. | | |
| 4 | Generating Station should be able to deliver rated Reactive Power at 'rated output' | | |

(v) Present status of installation of additional reactive compensation devices and their compliance status as per the table below:

| Sl. No. | Petition No. | Project Capacity (in MW) | Detail of additional static/dynamic/ hybrid reactive devices installed along with their rating after the working group report | Date of installation of additional dynamic reactive compensation devices | Additional cost incurred towards installation of additional static/dynamic/ hybrid reactive compensation devices (In INR) | Present status of compliance to the CEA standards for connectivity (compliant/ non-compliant/) | If the Petitioner has installed the static/ hybrid reactive power compensation device, the Petitioner is to |
|---------|--------------|--------------------------|---|--|---|--|---|
| | | | | | | | |

| | | | | | | | |
|--|--|--|--|--|--|-----------------------------|--|
| | | | | | | partially compliant) | provide the details of the specific approval for the installation of such a device |
| | | | | | | | |

(e) The GCIL to file the following information on an affidavit within three weeks in respect of the Petitioner's project:

| | | | | |
|--|--|---|---|---|
| Project Name: | POI: | | | |
| | Capacity (in MW): | | | |
| | COD (date-wise capacity declared COD): | | | |
| | Technology (Solar/ Wind/ Hybrid): | | | |
| | Nearest IMD Station | | | |
| Project Particulars | | Compliance status of the CEA Regulations before issuance of the Working Group Report | Changes, if any, after issuance of the Working Group Report for compliance | Corresponding CEA Regulation/ MoM/ letters etc. |
| Temperature for compliance of Dynamic Reactive Power capability (in °C) | | | | |
| Reactive Power (MVar) required to be complied with | Dynamic | | | |
| | Static | | | |
| Reactive Power Compensation devices installed (in MVar) for compliance | Dynamic | | | |
| | Static | | | |
| Date of submission of the Reactive Power compliance report by the Petitioner | | | | Latest revision date (if any): |
| Status of Compliance of Reactive Power Capability* | | | | Pre- and Post-WGR compliance status and basis for declaring so. |
| *ATR for non- compliance, if so. | | | | |

3. The Petitions will be listed for hearing on **17.7.2025**.

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