

**CENTRAL ELECTRICITY REGULATORY COMMISSION  
NEW DELHI**

**Petition No.519/MP/2024**

Subject : Petition under Section 79(1)(b) and 79(1)(f) of the Electricity Act, 2003 read with CERC (Conduct of Business) Regulations, 2023 and Article 12 of the PPA dated 14.6.2022 seeking in principle declaration that the Working Group Report, 2022 is a change in law event.

Petitioner : ReNew Surya Vihaan Private Limited (RSVPL).

Respondents : Solar Energy Corporation of India Limited & Ors.

**Petition (Dy.) No. 1300/2024**

Subject : Petition under Section 79(1)(b) and 79(1)(f) read with Section 29 of the Electricity Act, 2003; read with the applicable provisions of Power Purchase Agreement dated 19.4.2022 executed between the Petitioner and the Respondent No. 1 and the relevant provisions of the applicable laws inter alia seeking Change in Law claims with respect to the requirements to comply with the various new parameters and changes introduced by way of the Working Group Report, 2022 read with various Minutes of Meeting(s); and the Central Electricity Authority (Technical Standards for Construction of Electric Plants and Electric Lines) Regulations, 2022, inter alia for the Petitioner's 300 MW Solar Power Project in Bikaner, Rajasthan and reliefs for seeking extension of time inter alia to comply with the aforesaid requirements.

Petitioner : Ayana Renewable Power Three Private Limited (ARPTPL).

Respondents : Solar Energy Corporation of India Limited & Ors.

**Petition (Dy.) No. 40/2025**

Subject : Petition under Sections 79(1)(b) and 79(1)(f) read with Section 29 of the Electricity Act, 2003; read with the applicable provisions of Power Purchase Agreements both dated 7.12.2018 executed between the ACME Dhaulpur Powertech Private Limited and ACME Deoghar Solar Power Private Limited, and Solar Energy Corporation of India Limited, respectively, and the relevant provisions of the applicable laws inter alia seeking Change in Law reliefs with respect to the requirements to comply with the various new parameters and changes introduced by way of the Working Group Report, 2022 read with various Minutes of Meeting(s).

Petitioner : ACME Dhaulpur Powertech Private Limited & Anr (ADPPL).

Respondents : Solar Energy Corporation of India Limited & Ors.

**Petition (Dy.) No. 33/2025**

Subject : Petition under Sections 79(1)(b) and 79(1)(f) read with Section 29 of the Electricity Act, 2003; read with the applicable provisions of Power Purchase Agreements dated 06.12.2018 executed between ACME Raisar Solar Energy Private Limited and Solar Energy Corporation of India Limited, and ACME Phalodi Solar Energy Private Limited and Solar Energy Corporation of India Limited, along with the relevant provisions of the applicable laws inter alia seeking Change in Law reliefs with respect to the requirements to comply with the various new parameters and changes introduced by way of the Working Group Report, 2022 read with various Minutes of Meeting(s).

Petitioner : ACME Raisar Solar Energy Private Limited and Anr (ARSEPL).

Respondents : Solar Energy Corporation of India Limited & Ors.

**Petition (Dy.) No. 29/2025**

Subject : Petition under section 79(l)(b) & (f) of the Electricity Act, 2003 read with Regulation 65 of the CERC (Conduct of Business) Regulation, 2023 and Article 17 of the Power Purchase Agreements dated 17.04.2017 seeking declaration of working group committee report, issued by the central electricity authority, as a change in law event as well as other consequential reliefs.

Petitioner : Megasolis Renewables Private Limited (MRPL).

Respondents : Rewa Ultra Mega Solar (RUMS) Limited & Ors.

**Petition (Dy.) No. 25/2025**

Subject : Petition under Sections 79(1)(b) and (f) the Electricity Act, 2003 read with the regulation 65 of the CERC (Conduct of Business) Regulation, 2023 and article 12 of the 'EPA dated 28.12.2018 read seeking declaration of working group committee report, issued by the CEA, as a change 'in law event as well as other consequential reliefs.

Petitioner : Megasolis Renewables Private Limited (MRPL).

Respondents : Solar Energy Corporation of India Limited & Ors.

**Petition (Dy.) No. 22/2025**

Subject : Petition under Sections 79(1)(b) and (f) the Electricity Act, 2003 read with the regulation 65 of the CERC (Conduct of Business) Regulation, 2023 and article 12 of the PPA dated 31.5.2020 read with amendment-01 dated 10.12.2021 read seeking declaration of working group committee report, issued by the CEA, as a change in law event as well as other consequential reliefs.

Petitioner : Mega Suryaurja Private Limited (MSPL).

Respondents : Solar Energy Corporation of India Limited & Ors.

Date of Hearing : **16.1.2025**

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

Parties Present : Ms. Mannat Waraich, Advocate, RSVPL  
Shri Mridul Gupta, Advocate, RSVPL  
Ms. Ashabari Thakur, Advocate, RSVPL  
Ms. Poorva Saigal, Advocate, CTUIL  
Shri Shubham Arya, Advocate, CTUIL  
Ms. Pallavi Saigal, Advocate, CTUIL  
Shri Harshvardhan Singh, Advocate, CTUIL  
Shri Rishabh Saxena, Advocate, CTUIL  
Shri Aniket Prasoon, Advocate, ARPTPL, ADPPL & ARSEPL  
Ms. Archita Kashyap, Advocate, ARPTPL, ADPPL & ARSEPL  
Shri Adarsh Bhardwaj, Advocate, ARPTPL, ADPPL & ARSEPL  
Shri Nitish Gupta, Advocate, MRPL & MSPL  
Shri Nipun Sharma, Advocate, MRPL & MSPL  
Shri Deepak Thakur, Advocate, MRPL & MSPL  
Shri Anuj Bhawe, Advocate, WRLDC

### **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 counsels for the Petitioners submitted that these Petitions have been filed *inter alia* seeking a declaration that the “*Report of Working Group in respect of the Data Submission Procedure and Verification of Compliance to the CEA Regulations on Technical Standards for Connectivity to the Grid by RE Generators*” (‘Working Group Report, 2022’) issued by the Central Electricity Authority (CEA) constitutes a Change in Law event and the consequent reliefs qua allowance of the additional expenditure incurred towards such Change in Law event. Learned counsel for the parties also submitted that the parties may be permitted to complete the pleadings in these cases.

3. Considering the submissions made by the learned counsels for the parties, the Commission directed as under:

- (a) Admit and issue notice to the Respondents, subject to just exceptions;
- (b) The Petitioners to file the following details/ information, on affidavit, within four weeks:
  - (i) How does the "Report of the working group" referred to in the instant petitions constitute a Change in Law?
  - (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					
<b>Design Parameters</b>						
<b>RE plant Particulars</b>			<b>As per CEA Regulations 2007 &amp; Amendments</b>	<b>Considered while bidding</b>	<b>Parameters after Working Group Report, 2022</b>	<b>Corresponding clause of applicable CEA regulation and WGR</b>
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 planned to be installed before the Working Group Report, 20220 and additional equipments installed/ planned to be installed after the working group report, and the financial impact thereof.						
# Detailed Study Report to be submitted						

(iii) Whether the Petitioners have given any undertaking to Grid-India for compliance with the CEA Regulations/ working group report. If yes, the copy of the same if not filed with the Petition.

(iv) A copy of the relevant technical standards (IEC/IS standards) specifying the criteria for the design of the WTG/ solar inverters as applicable including reactive power capability.

(v) The details of the additional equipment 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 cutoff 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 the change in law claim is raised

(vi) The Petitioners 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, Design of the generating station considering  $\pm 1$  degree margin, and rated reactive power at rated output and capability to operate at least up to 'V Curve'. Furnish the increase in reactive power capability (in MVAR) 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 working group report
1	Point of Interconnection (PoI) 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'		

(c) Grid-India to file the following information on an affidavit, within three weeks:

(i) Information as per the below table:

Project Details	Capacity (in MW)	Compliance status of the CEA Regulations before issuance of Working Group Report	Changes, if any, after issuance of the Working Group Report for compliance	Corresponding CEA Regulation
	COD			
<b>Project Particulars</b>				
Temperature for compliance of Dynamic Reactive Power capability (in °C)				
Reactive Power Compensation device installed (in MVAR)	Dynamic			
	Static			
Date of submission of Reactive Power compliance report				
Status of Compliance of Reactive Power Capability. *				

\*Enclose the Action taken report in case of non-compliance

(ii) Furnish the following information as per the below table:

<b>Category of the RE Generator*</b>	
<b>Particulars</b>	
Compliance requirement being considered by the Grid-India /RLDCs for meeting the requirement of required reactive power capability (dynamic/ Static/ Hybrid)	
Basis of adoption of above criteria for being compliant (letter, MoM, Regulations, working group report or any other document)	
Petitions covered under such 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 (iii) the generators who are at connectivity approval/ processing stage etc.*

(iii) 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 undertaking given by the respective petitioners and the copy of undertakings may be submitted.

(d) The Petitioner in Petition No. 519/MP/2024 is directed as under:

(i) To implead the end procurers of the generating station as a party to the Petition and file the revised memo of parties within a week.

(ii) Submit a copy of the CTUIL letter dated 2.2.2023 within three weeks.

(e) The Petitioner in Petition (Dy.) Nos. 22/2025, 29/2025, and 25/2025 are directed to clarify on an affidavit within three weeks how the CEA letter dated 12.5.2023 qualifies as a Change in Law. What are the new requirements in terms of above said letter and what additional equipments has been installed by the Petitioner to comply with the said requirement?

(f) The Petitioner in Petition (Dy.) No. 1300/2024 is directed to clarify on an affidavit within three weeks how the CEA minutes of the meeting dated 10.1.2023 and 13.4.2023 and Central Electricity Authority (Technical Standards for Construction of Electric Plants and Electric Lines) Regulations, 2022 qualify as Change in Law. What are the new requirements in terms of the above said minutes and what additional equipments have been installed by the Petitioner to comply with the said requirement?

(g) The Petitioner in Petition (Dy.) Nos. 40/2025 and 33/2025 are directed to clarify how the CEA minutes of the meeting dated 10.1.2023, 13.4.2023, and 13.9.2023

qualify as Change in Law. What are the new requirements in terms of above-said minutes, and what additional equipments have been installed by the Petitioner to comply with the said requirement?

(h) The Respondents to file their respective reply to the Petition as well as the information asked and the details to be furnished by the Petitioners as above, within four weeks with a copy to the Petitioners, who may file their rejoinder(s), if any, within three weeks thereafter.

3. These Petitions will be listed for the hearing along with Petition Nos. 202/MP/2023 and batch on **21.3.2025**.

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