CAPTIVE POWER PRODUCERS ASSOCIATION
(Registered U/sec. 25 of Company Act 1956 & Certificate of IT 12AA
CIN: U91990MH2003GAP141611)

Secretariat Office
Technocraft Industries (India) Ltd.
Technocrat House A-25 MIDC, Marol Andheri (East),
Mumbai 400093
Contact: Nitin Ghorpade, Director
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Contact No. 9967013135

Vikas Patangia
PRESIDENT

Date: 26th December 2025

To, Secretary

Central Electricity Regulatory Commission

6th-8th Floor, World Trade Centre,

Tower B, Naurojinagar, New Delhi-110029

Email: secy@cercind.gov.in; shilpa@cercind.gov.in.

Subject: Suggestions /Comments on Staff Paper on Proposal for allocation of Connectivity granted (on LOA route) where the signing of the PPA/PSA is getting delayed

Dear Sir/ Ma'am,

We welcome the CERC inviting suggestions and comments from the stakeholders on **'Staff Paper on Proposal for allocation of Connectivity granted (on LOA route) where the signing of the PPA/PSA is getting delayed'**

We have gone through the staff paper and understand that the basic premises and objectives with which the staff paper is presented are:

1. Connectivity has become scarce resources and is becoming bottleneck in further RE growth.
2. The situation has emerged where project which have been granted connectivity are not in a position to even start the project while there may be some serious developers who already have land and ready to implement the project very quickly, but are not getting the connectivity, partly because of connectivity is blocked by generators who are not able to start the project because of lack of PPA or any other reasons.

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The staff paper trying to address these issues.

Considering the main objective of the staff paper, any option, other than revocation of the connectivity will not yield the desired results and the current cycle of non-utilization will be repeated. For example, it is suggested that the connectivity grantee can use the connectivity under Land BG route with condition that land documents to be submitted within 12 months. Again, the connectivity will be blocked for at least 12 months.

To address the current issues related to Connectivity and align with broader objectives and provisions of the CERC Connectivity and GNA Regulation, we suggest to :

1. Allow transfer of connectivity granted based on LOA1 to the developer if PPA is already signed under another LOA2 subject to conditions that : (i) The connectivity granted under that PPA (LOA2) is not meeting the PPA timeline requirements and (ii) available connectivity under LOA1 meets the requirement of PPA (LOA2)(such as solar hour / non- solar hour connectivity) (iii) Submission of security BG of Rs 10 lakh/MW.
2. In all other cases, where PPA is not signed for more than six months, connectivity shall be revoked. There is no reason why LOA route should be treated differently than the Land / Land BG route. If the connectivity grantee is serious to develop the project, he should participate in the subsequent auction of the relinquished connectivity. Such a provision will provide equitable rights to all developers, more so will provide an opportunity to serious developers.
3. No extension whatso ever to be granted for meeting milestones for land documents / FC / COD etc.

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4. Suggestions for the auction method:
    a. Developers who have land in possession should only be allowed to participate in the auction.
    b. One of the main objectives is to have grid security and optimum utilization of scarce transmission assets. Considering this objective, preference should be provided to project who proposes higher CUF. The auction method should build this preference. For example, 50% weightage to be given to CUF and 50% weightage to be given to premium.
5. All future connectivity to be granted based on auction method only.
6. Submission of land documents timeline to be reduced to six months.

Thanking you.

For CAPTIVE POWER PRODUCERS' ASSOCIATION



Nitin S. Ghorpade

Director (CPPA)