========== Forwarded message ==========
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Date: Mon, 15 Dec 2025 21:29:28 +0530
Subject: Sembcorp Comment on Hon'ble CERC Staff Paper
========== Forwarded message ==========

SC-Restricted

Dear Sir/Ma?am

With reference to public notice dated 25.11.2025 regarding Hon?ble CERC Staff Paper on Proposal for allocation of Connectivity granted (on LOA route) where the signing of the PPA/PSA is getting delayed.

Please find enclosed Sembcorp comments for your kind consideration.

Thanks & regards
Abhishek Srivastava
Sembcorp

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15.12.2025

Sembcorp's Comments/Suggestions on Hon'ble CERC Staff Paper

Sr no.	Staff Paper	Suggested change	Rational/ Remarks
1	**Option – I: Exit from LoA route without surrendering Connectivity** i. Within one month, such an entity may seek to exit from the LoA route, along with the NoC regarding non-signing of the PPA from the concerned REIA. Such LoA, basis which the Connectivity was granted, shall become an invalid document to obtain any other Connectivity or the LOA may be terminated by REIA. ii. The Conn-BGs (Conn-BG1, Conn-BG2, Conn-BG3) as already furnished shall continue to remain valid. Such entity shall furnish a Performance Bank Guarantee for Rs 10 lacs/MW to avail this option, which shall be returned on achieving COD for the corresponding capacity.	**Option – I: Exit from LoA route without surrendering Connectivity** i. Within one month, such an entity may seek to exit from the LoA route, along with the NoC regarding non-signing of the PPA from the concerned REIA. Such LoA, basis which the Connectivity was granted, shall become an invalid document to obtain any other Connectivity or the LOA may be terminated by REIA. ii. The Conn-BGs (Conn-BG1, Conn-BG2, Conn-BG3) as already furnished shall continue to remain valid. Such entity, within three months from such conversion, shall furnish a Performance Bank Guarantee for Rs 10 lacs/MW ~~to avail this option, which shall be returned on achieving COD for the corresponding capacity~~ or land documents for 50% of the land required for capacity for which connectivity is to be retained. Further, the PBG may be returned in case land documents for 50% of the land required for the project are submitted with CTU.	The provision 11(A) 3 of GNA Regulation provides for conversion of LoA based connectivity. In case the LoA is terminated by REIA. The regulation then provides for conversion in Land BG or Land route within 3 months. The same provision may be retained under this option.
2	iii. The scheduled date of commercial operation (SCOD) of such entity from the date of conversion shall not be later than 18 months.	iii. The scheduled date of commercial operation (SCOD) of such entity from the date of conversion shall not be later than ~~18~~ **24** months.	The Scheduled Commercial Operation Date (SCOD) for such entities, calculated from the date of conversion, may be extended to **24 months instead of the**

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			current 18 months, as the originally prescribed 18-month period is insufficient for practical execution. Project developers typically encounter multiple on-ground challenges—such as, statutory clearances, construction lead times, procurement constraints, and logistical issues—which collectively make an 18-month completion timeline unrealistic. Allowing a 24-month SCOD provides a more practical and achievable timeframe, ensuring project viability without compromising regulatory intent.
3.	**Option-III – Exit from Connectivity** d. There shall be two windows for calling the auction of such surrendered Connectivity basis, whether the evacuation system exists or is under commissioning: i. In case the auction of the Connectivity is done at the substation which has achieved COD or is under construction with an anticipated date of commissioning within 12 months of the surrender of the Connectivity, the following modalities of auction shall be applicable. It is assumed that GNA would be effective upon commissioning such a substation.	**Option-III – Exit from Connectivity** d. There shall be two windows for calling the auction of such surrendered Connectivity basis, whether the evacuation system exists or is under commissioning: i. In case the auction of the Connectivity is done at the substation which has achieved COD or is under construction with an anticipated date of commissioning within 12 months of the surrender of the Connectivity, the following modalities of auction shall be applicable. It is assumed that GNA would be effective upon commissioning such a substation. • The commissioning timeline of the project for such awarded connectivity shall be up to 12 months, subject to any force majeure condition.	Force majeure protection is essential to ensure that developers are not penalized for delays arising from uncontrollable external events. It preserves fairness, supports bankability, aligns with sector-wide contractual norms, and encourages broader participation in the connectivity auction while maintaining orderly grid planning.

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	• The commissioning timeline of the project for such awarded connectivity shall be up to 12 months.		