



**RP - Sanjiv Goenka
Group**
Growing Legacies



CORP:SERV : 2620

16 April 2025

The Secretary
Central Electricity Regulatory Commission
6th, 7th & 8th Floors
Tower B, World Trade Centre
Nauroji Nagar
New Delhi – 110 029

Sir,

**Subject: Submissions on the Draft Central Electricity
Regulatory Commission (Connectivity and General Network
Access to the inter-State Transmission System)
(Third Amendment) Regulations, 2024 and Central Electricity
Regulatory Commission (Connectivity and General Network
Access to the inter-State Transmission System)
(Fourth Amendment) Regulations, 2025**

With reference to the public notice No. L-1/261/2021/CERC dated 03.03.2025, we are submitting our suggestions / comments in Attachment on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025, which were published on 03.03.2025. We humbly submit that due to some unforeseen exigencies we could not submit the comments within the stipulated timeline. We regret the delay and pray for condonation of the same.

Also, since the Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Third Amendment) Regulations, 2024 is still in draft stage, we are taking liberty to submit our comments for your kind consideration also on the Draft Third Amendment in the Attachment.

We sincerely hope that our submissions will be accepted for the finalization process.

Assuring you of our best attention.

Yours faithfully,

A handwritten signature in blue ink, appearing to read "L. L. Ali".

Sr. Vice President (Regulatory Affairs)

Encl.

Submissions - Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Third Amendment) Regulations, 2024

Sl. No.	Draft Regulation	Remarks
1.	Treatment of bank guarantee in case of withdrawal of GNA application in various stages of application	This will reduce procedural complications and therefore is a welcome step.
2.	Applicants who have been issued an in-principle or final grant of Connectivity to ISTS, based on particular RE source in part or full, can change to another RE source for the same connectivity quantum within 18 months from the in-principle grant of Connectivity.	This is favourable for Renewable plants and therefore is a welcome step.
3.	The Nodal Agency, with the consent of the concerned Connectivity grantee(s), may reallocate the Connectivity granted at an ISTS sub-station to another ISTS sub-station where any terminal bay has fallen vacant due to surrender or revocation.	This is favourable for Renewable plants and therefore is a welcome step.
4.	Distribution licensee or bulk consumer may apply for a grant of GNA, by seeking interconnection at (i) a terminal bay of an ISTS sub-station already allocated to such entity, or (ii) a terminal bay of an ISTS sub-station already allocated to another entity (injecting entities), or (iii) switchyard of a generating station having Connectivity to ISTS, with an agreement duly signed between the Applicant and the said entity for sharing the terminal bay or the switchyard and the dedicated transmission lines, if any:	Bulk consumers should not be permitted to seek interconnection through terminal bays allocated to injecting entities or switchyard of generating station. It will affect network planning and may jeopardize the grid operation. Allowing GNA to bulk consumers will also affect GNA for distribution licensees, who are responsible for universal supply obligation and whose consumer base typically has million of consumers with low end consumptions.

Sl. No.	Draft Regulation	Remarks
5.	An injecting entity connected to intra-State transmission system or distribution system is eligible for seeking T-GNA for the purpose of injection into ISTS.	It will favour injecting entity to get T-GNA and therefore is a welcome step.

Submissions - Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025

Sl. No.	Draft Regulation	Remarks
1.	Restricting Non-Serious Players & Connectivity Trading To prevent speculative trading of connectivity, introduces restrictions on ownership or shareholding changes for Connectivity grantees till COD	Considering the investments which are already in pipeline, the change may be brought at a future date, providing adequate time to all the stakeholders to get aligned with the changed regime.
2.	Revocation of Connectivity for Renewable Power Park Developers (RPPDs) RE Park developers need to provide CODs for each of the generating stations in the park	This will help in better network planning and grid management.
3.	Addressing Multiple Start Date Issues for STUs Allows STUs to provide multiple start dates and connectivity quantum (4 times) while applying for additional GNA, resolving concerns raised in a petition by an STU	This will help in optimization of costs and therefore is a welcome step.