

**CENTRAL ELECTRICITY REGULATORY COMMISSION
NEW DELHI**

Petition No. 202/MP/2023

Subject : Petition under Section 79(1)(b) &(f) of the Electricity Act, 2003 read with Regulation 111 of the Central Electricity Regulatory Commission (Conduct of Business) Regulations, 1999 and Article 12 of Power Purchase Agreement dated 8.12.2021 seeking Working Group Report 2022 as Change in Law Event.

Petitioner : TP Saurya Limited (TPSL)

Respondents : Kerala State Electricity Board Limited (KSEBL) and Ors.

Petition No. 272/MP/2023

Subject : Petition under section 79(1)(a) & (f) of the Electricity Act, 2003, read with regulation 111 of the Central Electricity Regulatory Commission (Conduct of Business) Regulations, 1999 and article 12 of the power purchase agreement seeking Working Group Report, 2022 as a Change in Law event.

Petitioner : NTPC Limited (NTPC)

Respondents : Uttar Pradesh Power Corporation Limited (UPPCL) and Ors.

Petition No. 236/MP/2023

Subject : Petition under Section 79 of the Electricity Act, 2003 read with Articles 12.2 of the Power Purchase Agreement dated 16.12.2019 for supply of 324.4 MW wind energy-based power entered between Adani Wind Energy MP One Pvt. Ltd. and Solar Energy Corporation of India Ltd. seeking Change in Law compensation along with Carrying Cost.

Petitioner : Adani Wind Energy MP One Private Limited (AWEMOPL)

Respondents : Solar Energy Corporation of India Ltd. & Ors.

Petition No. 286/MP/2023

Subject : Petition under Section 79 of the Electricity Act, 2003 read with appropriate provisions of applicable law inter-alia seeking extension of time to comply with the directions of the Respondent No. 2 to install the required reactive power compensation device for the Petitioner's 300 MW solar power project situated at Village: Sonanda, Shekhasar, Bandhari, and Kesarpura, Tehsil Bap, District Jodhpur, Rajasthan; and consequently, restrain the Respondent No. 2 from taking coercive action against the Petitioner till such time.

Petitioner : Azure Power Maple Private Limited (APMPL)
Respondents : Northern Regional Load Despatch Centre (NRLDC) and Ors

Petition No. 335/MP/2023

Subject : Petition under section 79(1)(a) & (f) of the electricity act, 2003 read with regulation 111 of the Central Electricity Regulatory Commission (Conduct of Business) Regulations, 1999 and Article 10 of the Power Usage Agreements seeking Working Group Report, 2022 as Change in Law event.

Petitioner : NTPC Limited (NTPC)
Respondents : Southern Power Distribution Co. of Telangana Ltd. and Ors.

Petition No. 16/MP/2024

Subject : Petition under Section 79(1)(b) & (f) of the Electricity Act, 2003 read with Regulation 111 of the Central Electricity Regulatory Commission (Conduct of Business) Regulations, 1999 and Article 12 of the Power Purchase Agreement dated 30.10.2019 executed between the Petitioner and Solar Energy Corporation of India ("SECI"/Respondent No. 1") seeking declaration of the 'Report of the Working Group in respect of Data Submission Procedure and Verification of Compliance to CEA Regulation on Technical Standards for Connectivity to the Grid by RE Generators' ("Working Group Report, 2022") issued by the Central Electricity Authority as a Change in Law Event, and consequently devise an appropriate mechanism for compensation to the Petitioner along with carrying costs and interest on carrying cost.

Petitioner : Ostro Kannada Power Private Limited (OKPPL)
Respondents : Solar Energy Corporation of India Limited (SECI) and Ors

Petition No. 40/MP/2024

Subject : Petition under Section 79 of the Electricity Act, 2003 read with Article 12.2 (Change in Law) of the Power Purchase Agreements dated 21.07.2017 executed for the development of 50 MW ISTS connected wind project between Adani Wind Energy Kutchh One Limited [Formerly known as Adani Green Energy (MP) Limited] and PTC India Limited, seeking relief for the additional expenditure incurred due to occurrence of Change in Law event.

Petitioner : Adani Wind Energy Kutchh One Ltd. (AWEKOL)
Respondents : PTC India Limited (PTCIL) and Ors.

Petition No. 81/MP/2024

Subject : Petition under Section 79 of the Electricity Act, 2003 read with Article 12.2 of the Power Purchase Agreement dated 29.12.2017 for the development of 50 MW ISTS connected wind project between Adani Wind Energy Kutchh One Limited [Formerly known as Adani Green Energy (MP) Limited] and Solar Corporation of India Limited seeking reliefs for the additional expenditure incurred due to occurrence of Change in Law event.

Petitioner : Adani Wind Energy Kutchh One Ltd. (AWEKOL)

Respondents : Solar Energy Corporation of India Limited (SECI) and Ors.

Petition No. 82/MP/2024

Subject : Petition under Section 79 of the Electricity Act, 2003 read with Article 12.2 of the Power Purchase Agreements dated 25.10.2019 for the development of 250 MW ISTS connected wind project between Adani Wind Energy Kutchh Three Limited [Formerly known as Adani Green Energy Three Limited] and Solar Energy Corporation of India Ltd. seeking reliefs for the additional expenditure incurred due to occurrence of Change in Law event.

Petitioner : Adani Wind Energy Kutchh Three Ltd. (AWEKTL)

Respondents : Solar Energy Corporation of India Limited (SECI) and Ors.

Petition No. 25/MP/2024

Subject : Petition under section 79(1)(a) & (f) of the Electricity act, 2003 read with Regulation 111 of the Central Electricity Regulatory Commission (Conduct of Business) Regulations, 1999 and Article 10 of the Power Usage Agreements seeking Working Group Report, 2022 as Change in Law Event.

Petitioner : NTPC Green Energy Limited (NGEL)

Respondents : Southern Power Distribution Co. of Telangana Limited and Ors.

Petition No. 43/MP/2024

Subject : Petition under Section 79 of the Electricity Act, 2003 read with Article 12.2 of the Power Purchase Agreement dated 19.11.2019 entered between Adani Wind Energy Kutchh Five Limited (formerly known as Adani Green Energy Five Limited) and Solar Energy Corporation of India Ltd. seeking reliefs for the additional expenditure incurred due to occurrence of Change in Law event.

Petitioner : Adani Wind Energy Kutchh Five Limited (AWEKFL)

Respondents : Solar Energy Corporation of India Limited and Ors.

Petition No. 49/MP/2024

Subject : Petition under Section 79 of the Electricity Act, 2003; read with applicable provisions of Power Purchase Agreement dated 14.09.2021 executed between the Petitioner and the Respondent No. 1 and the relevant provisions of the applicable law inter alia seeking Change in Law claims with respect to the mandate of installing reactive power compensation devices for the Petitioner's 300 MW Wind Power Project in Gadag, Karnataka and reliefs for seeking extension of time to comply with the aforesaid requirements.

Petitioner : Ayana Renewable Power Six Private Limited (ARPSPL)

Respondents : Solar Energy Corporation of India Limited and Ors.

Petition No. 57/MP/2024

Subject : Petition under Section 79(1)(b) and (f) of the Electricity Act, 2003 read with Regulation 111 of the Central Electricity Regulatory Commission (Conduct of Business) Regulations, 1999 and Article 12 of Power Purchase Agreement dated 21.10.2016 seeking in-principle approval of the occurrence of Change in Law events, i.e., issuance of the Central Electricity Authority (Technical Standards for Connectivity to the Grid) (Amendment) Regulations, 2019 and the Working Group Report, 2022.

Petitioner : Tata Power Renewable Energy Limited (TPREL)

Respondents : Solar Energy Corporation of India Limited and Ors.

Petition No. 139/MP/2024

Subject : Petition under Section 79(1)(b) and (f) of the Electricity Act, 2003 read with Regulation 65 of the CERC (Conduct of Business) Regulations, 2023 and Article 17 of Power Purchase Agreements dated 25.11.2021 seeking in-principle approval of the occurrence of Change in Law event, i.e., issuance of the Working Group Report, 2022.

Petitioner : Talettutayi Solar Projects Nine Private Limited (TSPNPL)

Respondents : M. P Power Management Co. Limited and Ors.

Petition No. 334/MP/2024

Subject : Petition under Section 79(1)(b) and 79(1)(f) of the Electricity Act, 2003 read with the Central Electricity Regulatory Commission (Conduct of Business) Regulations, 2023 and Article 12 of the Power Purchase

Agreement dated 14.6.2022 seeking in-principle declaration that the Working Group Report, 2022 is a Change in Law event and grant of consequential reliefs thereto.

Petitioner : ReNew Surya Aayan Private Limited (RSAPL)

Respondents : Solar Energy Corporation of India Limited (SECI) and Ors.

Petition No. 121/MP/2024

Subject : Petition under Section 79 of the Electricity Act, 2003 and Article 12.2 of the Power Purchase Agreement dated 20.08.2019 for the development of 300 MW (reduced to 150 MW) ISTS connected Solar power project entered between Adani Solar Energy Jaisalmer Two Private Limited (formerly known as SBSR Power Cleantech Eleven Private Limited) and Solar Energy Corporation of India Ltd., read with Electricity (Timely Recovery of Costs due to Change in Law) Rules, 2021, seeking a declaration that the Report of the Working Group issued in July, 2022 constitutes as a Change in Law event and consequent reliefs qua allowance of the additional expenditure incurred towards such Change in Law event.

Petitioner : Solar Energy Jaisalmer Two Private Limited (SEJTPL)

Respondents : Solar Energy Corporation of India Limited (SECI) and Ors.

Petition No. 124/MP/2024

Subject : Petition under Section 79(1)(b),(c) & (f) of the Electricity Act, 2003 read with Regulation 111 of the Central Electricity Regulatory Commission (Conduct of Business) Regulations, 1999, Clause 8.5.3 of the Competitive Bidding Guidelines, 2020 and Article 12 of Power Purchase Agreement dated 31.03.2023 seeking in principle approval of introduction of the Working Group Report, 2022 and the amendments brought to the Project Import Regulation, 1986 by the Notifications dated 19.10.2022 and 01.02.2023 as a Change in Law Event.

Petitioner : TP Saurya Limited (TPSL)

Respondents : Solar Energy Corporation of India Limited (SECI) and Ors.

Petition No. 142/MP/2024

Subject : Petition under Section 79(1)(b) and (f) of the Electricity Act, 2003 read with Regulation 65 of the Central Electricity Regulatory Commission (Conduct of Business) Regulations, 2023 and Article 12 of Power Purchase Agreements dated 28.6.2016 and 4.11.2017 seeking in principle approval of occurrence of Change in Law event i.e. Issuance of Central Electricity Authority (Technical Standards for Connectivity

to the Grid) (Amendment) Regulations, 2019 and the Working Group Report, 2022.

Petitioner : Tata Power Renewable Energy Limited (TPREL)

Respondents : NTPC Limited (SECI) and Ors

Petition No. 195/MP/2024

Subject : Petition under Section 79(1)(b) and (f) of the Electricity Act, 2003 read with Regulation 65 of the Central Electricity Regulatory Commission (Conduct of Business) Regulations, 2023 and Article 17 of Power Purchase Agreements seeking in principle approval of occurrence of Change in Law event i.e. Issuance of the Working Group Report, 2022.

Petitioner : TP Saurya Limited (TPSL)

Respondents : Rewa Ultra Mega Solar Limited and Ors.

Petition No. 98/MP/2024

Subject : Petition under Section 79 of the Electricity Act, 2003 read with Article 9.2 of the Power Purchase Agreements dated 17.07.2018 for the development of 75 MW ISTS connected wind project between Adani Wind Energy Kutchh Six Limited [Formerly known as Adani Renewable Energy (GJ) Limited] and Maharashtra State Electricity Distribution Company Limited seeking reliefs for the additional expenditure incurred due to occurrence of Change in Law event.

Petitioner : Adani Wind Energy Kutchh Six Limited (AWEKSL)

Respondents : Maharashtra State Electricity Distribution Co. Ltd. (MSEDCL)

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 No. 115/MP/2025

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 No. 117/MP/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 No. 146/MP/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 No. 145/MP/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 No. 144/MP/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 No. 116/MP/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

Petitioner : Mega Suryaurja Private Limited (MSPL).

Respondents : Solar Energy Corporation of India Limited & Ors.

Petition No. 585/MP/2025

Subject : Petition under Section 79(1)(b) and (f) of the Electricity Act, 2003 read with Article 12 of the Power Purchase Agreement dated 30.3.2021 seeking relief on account of Change in Law by way of the "Report of Working Group in respect of Data Submission Procedure and Verification of Compliance to CEA Regulations on Technical Standards for Connectivity to the Grid by RE Generators".

Petitioner : Rising Sun Energy (K) Private Limited (RSEKPL)

Respondents : NTPC Limited and Ors.

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 Green Energy Limited (SGEL)

Respondents : Gujarat Urja Vikas Nigam Limited 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 Central Electricity Regulatory Commission (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 : **11.3.2026**

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

Parties Present : Shri Sajan Poovayya, Sr. Advocate, MRPL, MSPL
Shri Nitish Gupta, Advocate, MRPL, MSPL
Ms. Nipun Sharma, Advocate, MRPL, MSPL
Ms. Raksha Agrawal, Advocate, MRPL, MSPL
Shri Harshvardhan, Advocate, MRPL, MSPL
Shri Venkatesh, Advocate, TPSL, NTPC, NGEL, TPREL, TSPNPL
Shri S. Buttan, Advocate, TPSL, NTPC, NGEL, TPREL, TSPNPL
Ms. P. Dhankar, Advocate, TPSL, NTPC, NGEL, TPREL, TSPNPL
Shri N Bhatnagar, Advocate, TPSL, NTPC, NGEL, TPREL, TSPNPL
Ms. Drishti Rathi, Advocate, TPSL, NTPC, NGEL, TPREL, TSPNPL
Shri Aniket Prasoon, Advocate, APMPL, ARPSPL, ARPTPL, ACME, ARSEPL
Shri Aman Sheikh, Advocate, APMPL, ARPSPL, ARPTPL, ACME, ARSEPL
Shri Adarsh Bhardwaj, Advocate, APMPL, ARPSPL, ARPTPL, ACME, ARSEPL
Ms. Archita Kashap, Advocate, APMPL, ARPSPL, ARPTPL, ACME, ARSEPL
Ms. Tanya Bajaj, Advocate, APMPL, ARPSPL, ARPTPL, ACME,

ARSEPL

Ms. Ashabari Thakur, Advocate, OKPPL, RSAPL, RSVPL

Ms. Mannat Waraich, Advocate, OKPPL, RSAPL, RSVPL

Shri Amit Kapur, Advocate, AWEMOPL, AWEKOL, AWEKTL, AWEKFL, AWEKSL

Ms. Poonam Sengupta, Advocate, AWEMOPL, AWEKOL, AWEKFL, AWEKTL, AWEKSL

Ms. S. Kapoor, Advocate, AWEMOPL, AWEKOL, AWEKFL, AWEKTL, AWEKSL

Shri Pradyumn Sharma, Advocate, AWEKFL, AWEKOL, AWEKTL, AWEKSL, AWEMOPL

Shri Harshit Singh, Advocate, ASEJTPL

Shri Hemant Singh, Advocate, ASEJTPL

Shri Lakshyajit Singh Bagdwal, Advocate, ASEJTPL

Shri Aditya K Singh, Advocate, UPPCL, RSDCL, HPPC

Shri Gaurav Dudeja, Advocate, UPPCL

Shri Dhruval Singh, Advocate, UPPCL

Ms. Mandakini Ghosh, Advocate, SECI

Shri Rahul Ranjan, Advocate, SECI

Ms. Shikha Ohri, Advocate, SECI

Shri Kartik Sharma, Advocate, SECI

Shri Nitin Gaur, Advocate, MPPMCL

Shri Anshul Singh, Advocate, MPPMCL

Shri Ravi Sharma, Advocate, CSPDCL

Shri Aryan Chanda, CSPDCL

Ms. Ayushi, Advocate, SCPDCL

Shri Nikhil Anand, Advocate, CESC

Shri Avijeet Lala, Advocate, CESC

Shri Ravi Kishore, Advocate, PTC

Shri Prabhas Bajaj, Advocate, KSEBL

Shri Rithvik Mathur, Advocate, KSEBL

Ms. Pragya Gupta, Advocate, MSEDCL & APSPDCL

Shri Vyom Chaturvedi, Advocate, MSEDCL

Shri Anand Ganesan, Advocate, GUVNL, RUVITL & PSPCL

Ms. Harsha V Rao, Advocate, GUVNL

Shri Robin Singh, Advocate, GUVNL

Ms. Devyani Prasad, Advocate, PSPCL

Shri Amal Nair, Advocate, PSPCL, RUVITL

Ms. Khyati Chhabra, Advocate, RUVITL

Shri Hitendra Nath Rath, Advocate, GRIDCO

Shri D. Abhinav Rao, Advocate, TSSPDCL

Shri Abishek Das, Advocate, TSSPDCL

Ms. Abiha Zaidi, Advocate, POSOCO

Ms. Suriti Chowdhary, Advocate, POSOCO

Shri Pritam Raman Giriya, Advocate, POSOCO

Ms. Bhumitra Dubey, Advocate, POSOCO

Ms. Tanya Sharma, Advocate, POSOCO

Ms. Arushi, Advocate, POSOCO

Shri Ashish Bainsala, POSOCO

Shri Gajendra Sinh Vasava, POSOCO

Record of Proceedings

During the hearing, the learned counsels for the Petitioners in these batch Petitions made detailed submissions with respect to the Working Group Report 2022 (WGR, 2022) being a Change in Law event and concluded their respective arguments in rejoinders in these matters.

2. Learned counsel for the Petitioner, in Petition Nos. 43/MP/2024, 236/MP/2023, 40/MP/2024, 81/MP/2024, 82/MP/2024, 98/MP/2024, and 121/MP/2024 submitted that WGR, 2022 changed the interpretation and compliance obligation under Regulation B.B2(1) of The CEA Regulations, 2013. Learned counsel further submitted that the change in language from “within the limits of the V-curve” in Regulation B.B2(1) of the CEA Regulations, 2013, to “at least up to the V-curve boundaries” in CEA’s Working Group Report is a conscious and substantive departure from the original regulatory requirement and cannot be treated as a ‘mere clarification’. Learned counsel further added that the WGR report, along with the WRLDC enforcement directions issued, *vide* letter dated 3.3.2023, qualifies as a Change in Law as both CEA and WRLDC come under the ambit of Indian Government Instrumentalities. He further submitted that pursuant to the fresh compliance obligations introduced by the WGR and the WRLDC enforcement directions of March 2023, the Petitioners were compelled to install reactive power compensation devices incurring additional expenditure, which were not factored in at the bid cut-off date. Learned senior counsel also sought liberty to file the written submissions in the matter.

3. Learned senior counsel for the Petitioners in Petition Nos. 144/MP/2025, 145/MP/2025, and 116/MP/2025 submitted that WGR 2022 has been issued by an Indian Government Instrumentality having the force of law, and as it mandates the Petitioner to comply with additional requirements, it qualifies as a change in law. Learned senior counsel further submitted that WGR is not merely a clarification but represents a change in interpretation of the erstwhile CEA Technical Standards, as evident from the Minutes of Meetings held between the representatives of the CEA, CTUIL, POSOCO, and SECI on 28.05.2021, 14.07.2021, and 23.09.2021. Learned senior counsel further apprised that Grid India, in its response, has submitted that only the project in Petition No. 145/MP/2025 is compliant with, while for projects in Petition Nos. 144/MP/2025 and 116/MP/2025, Grid India has mistakenly stated that these are non-compliant. In this regard, the learned senior counsel submitted that the said issue is being taken up with Grid India. Learned senior counsel also sought liberty to file the written submissions in these matters.

4. Learned counsel for the Petitioners in Petition Nos. 202/MP/2023, 272/MP/2023, 335/MP/2023, 25/MP/2024, 57/MP/2024, 139/MP/2024, 124/MP/2024, 142/MP/2024, and 195/MP/2024 while relying on the minutes of meetings dated 14.07.2021 and 23.09.2021 held between CEA, CTUIL, and POSOCO, submitted that there was no clarity in the meeting regarding compliance with dynamically varying reactive power requirements and V-Curve boundaries under the CEA Regulations. It was then that the WGR 2022 was issued, which changed the interpretation of the previous CEA’s technical standards.

5. Learned counsel for the Petitioner in Petition No. 585/MP/2025, while submitting that WGR is a Change in Law, also made detailed submissions in its rejoinder to the matter. He submitted that the RE plants have an inherent capacity to generate reactive power without installation of any additional reactive equipment. In addition to their inherent capacity, they also have the flexibility to switch their active power generation to reactive power. Until the WGR, this inherent capacity to generate sufficient reactive support for the grid was regarded as sufficient and compliant with the CEA technical standards. Further, if any change enhances the burden on the parties affected, then it is a change in law because it is a burden that is mandatorily inflicted by an authority that has the force of law on account of Section 73, etc. and also on account of the condition that unless they satisfy the technical standards as per the authority that implements them, the same would lead to disconnection from Grid.

6. Learned counsel for the Respondent, while objecting to the arguments made by the Petitioner in Petition No. 585/MP/2025, submitted that the arguments made by the Petitioner are placing new facts on record and this cannot be the rejoinder. To the above apprehensions, the Petitioner's counsel submitted that these are all from the pleadings made in Petition No. 202/MP/2023. In response, the learned counsel for the Respondent submitted that the rejoinder can only be made on the instant Petition's facts, and the Petitioner cannot rely on submissions made in another Petition in the instant matter.

7. The learned counsel for the Petitioner in Petition Nos.49/MP/2024 and 115/MP/2025, submitted that in the CEA's response dated 23rd April 2024, it is mentioned that the report of the working group was finalized in the meeting held on 27.07.2022 and after approval of Chairperson CEA, the report was communicated to all members of the working group. In the context of Petition No. 49/MP/2024 and Petition No. 115/MP/2025, there were clear directions from RLDCs to follow the requirements set out in the WGR report, which constitutes a Change in Law.

8. The learned counsel for the Petitioner in Petition No 286/MP/2023 sought liberty to de-tag the instant Petition from the batch matters because there is no prayer asking for a change in law, and the Petition was clubbed with the batch at a very early stage.

9. Learned counsels for the Respondents in Petition No.(s) 57/MP/2024 and 98/MP/2024, submitted that they have already completed their respective sets of arguments in these matters during the last date of the hearing.

10. After hearing the learned senior counsels and learned counsels for the parties, the Commission noted that several parties have not complied with the earlier directions issued by the Commission. Therefore, the Commission once again directed the parties in the captioned matters to file their respective compliance affidavits in terms of previous directions, if not already done so, before the next date of hearing in these matters. The Parties were also permitted to file their respective brief notes of submissions/arguments (not exceeding four pages) before the next date of hearing.

11. These Petitions, except for Petition No. 286/MP/2023, will be listed for compliance as above, on **16.4.2026 at 2.30 P.M.**

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

Joint Chief (Law)

