

**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 : **20.1.2026**

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 Manav Saluja, Advocate, MRPL, MSPL
Shri Harshvardhan, Advocate, MRPL, MSPL
Shri Hemant Sahai, Advocate, MRPL, MSPL
Shri Jafar Alam, Advocate, RSEKPL
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 Saunak Rajguru, Advocate, AWEMOPL
Ms. Anushree Bardha, Advocate, SGEL
Ms. Ritika Singh, Advocate, SGEL
Ms. Somya Sahni, Advocate, SGEL
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
Shri Udit Gupta, Advocate, MSEDCL & APSPDCL
Shri Nitin Gaur, Advocate, MPPMCL
Shri Anshul Singh, Advocate, MPPMCL
Shri Ravi Sharma, Advocate, CSPDCL
Shri Aryan Chanda, CSPDCL
Shri Tarun Johri, Advocate, DMRC
Shri Ankur Gupta, Advocate, DMRC
Shri Nikhil Anand, Advocate, CESC
Ms. Shikha Ohri, Advocate, SECI
Shri Kartik Sharma, Advocate, SECI
Shri Rahul Ranjan, Advocate, SECI
Ms. Mandakini Gosh, Advocate, SECI
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
Shri Utkarsh Singh, Advocate, GUVNL
Shri Robin Singh, Advocate, GUVNL
Ms. Devyani Prasad, Advocate, PSPCL, RUVITL
Shri Amal Nair, Advocate, PSPCL, RUVITL
Shri Hitendra Nath Rath, Advocate, GRIDCO
Ms. Laxmi, Advocate, GRIDCO
Shri M G Ramachandran, Sr. Advocate, CTUIL
Shri Shubham Arya, Advocate, CTUIL, PSPCL & HPPC
Ms. Pallavi Saigal, Advocate, CTUIL
Shri Rishabh Saxena, Advocate, CTUIL

Ms. Reeha Singh, Advocate, PSPCL & HPPC
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 Ashok Rajan, POSOCO
Shri Alok Mishra, POSOCO
Shri Gajendra Sinh Vasava, POSOCO
Ms. Priyanka Meena, POSOCO
Shri Arijit Maitra, Advocate, BYPL
Shri Hasan Murtaza, Advocate, BRPL
Shri Sameer Sharma, Advocate, BRPL
Shri Ankit Kumar Sinha, Advocate, BRPL
Shri Prashant Garg, NRLDC
Shri Ajit Kumar Yadav, NRLDC
Ms. Shreya Jad, NPCL

Record of Proceedings

During the course of the hearing, the learned counsels for the Respondents in these batch Petitions made detailed submissions with respect to the Working Group Report 2022 (WGR) not constituting a Change in Law event and concluded their respective arguments in these matters.

2. Learned counsel for the Respondent, UP Discoms, in Petition Nos. 40/MP/2024, 82/MP/ 2024, and 43/MP/2024 submitted as under:

(a) The condition prescribed under the CEA (Technical Standards for Connectivity to the Grid) Regulations (Amendment), 2013, which has been relied upon by the parties, ought not to be read in isolation and the regulations must be construed as a whole. The learned counsel, while referring to Regulation 4 of the CEA (Technical Standards for Connectivity to the Grid) Regulations, 2007, submitted that the objective of these regulations is to ensure safe operation, integrity, and reliability of the grid. Any new connection shall not cause any adverse effect on the grid, and the grid shall continue to meet the specified reliability, security, and quality standards in accordance with the CEA Grid Regulations, 2010.

(b) Clause (2) of Regulation 6 of the CEA (Technical Standards for Connectivity to the Grid) Regulations, 2007 provides that the requester and the user shall furnish the data as required by the Appropriate Transmission Utility or by the licensee or the generating station with whose system the inter-connection is proposed. Emphasis was placed on the term "*inter-connection*".

(c) With regard to the arguments as to whether the requirements are to be complied with at the point of interconnection or at the switchyard, the learned Counsel submitted that the regulation which prescribes these conditions envisages the conditions to be met at the interconnection point.

(d) The provisions referred to in the working group report are already contained in the aforesaid CEA Regulations, 2007,

(e) The expression “*dynamically varying*” has been intentionally used as the grid is dynamic in nature and, therefore, there cannot be a single fixed operating point at which the generator is required to meet the prescribed requirement. For this reason, a band of 0.95 lagging to 0.95 leading has been prescribed.

(f) The intent and legislative objective of the regulation is to ensure the safety of the grid, and that the grid would not remain safe if a generator, at its own discretion, were to choose a single operating point within the prescribed band and limit compliance to that point, while the grid conditions and corresponding requirements for ensuring grid safety continue to vary dynamically.

(g) The working group report merely prescribes the manner of testing that the generating station is capable of meeting the requirements at the extreme ends of the band. For this purpose, the generator must demonstrate compliance at both extreme ends of the curve.

(h) There was no requirement for the Petitioners to install any additional equipment to meet the requirements of the CEA (Technical Standards for Connectivity to the Grid) (Amendment) Regulations, 2013, and that the requirement to install additional equipment has arisen only on account of the issuance of the WGR. In this regard, the Petitioners in their undertakings not only sought time to comply with the applicable CEA regulations but also expressly undertook to comply with the stipulated conditions. If there had been no requirement under the 2013 Regulations to install any equipment to meet the prescribed standards, there would have been no need for the Petitioners to furnish such undertakings at that stage.

(i) The lack of enforcement by the enforcing authority does not confer any right upon the Petitioners. Even if the provisions were not actively enforced earlier, the statutory requirement always existed in law.

3. The learned counsel for the Respondent, DMRC, in Petition No. 145/MP/2025, submitted that the case put forth by the Petitioner is premised solely on a change in interpretation. He referred to the Minutes of Meeting dated 28.05.2021, convened to discuss the request made by Adani Wind Energy Kutchh Three Limited regarding difficulties in implementing the provisions relating to reactive power requirements for renewable energy generation sources, and submitted that the Working Group Report came into existence only because developers and IPPs had difficulties in complying with the existing regulations. He added that the Working Group Report merely provides clarification and lays down procedures for the demonstration of compliance. It does not amount to an amendment, modification, or interpretation of the regulations.

4. Learned counsel for the Respondent, CESC, in Petition No. 124/MP/2024, adopted the submissions made by the Respondent, MUL, therein during the last hearing dated 18.11.2025. However, the learned counsel reserved its right to make submissions in respect of the Change in Law claims raised by the Petitioner at an appropriate stage.

5. The learned counsel for the Punjab, Gujarat & Rajasthan Discoms submitted that the working group report does not amount to a Change in Law and it is merely a clarificatory order. The learned counsel further adopted the submissions made by the other Respondents on the issue of Change in Law.

6. Learned counsel for the Respondent, CTUIL, in Petition No. 286/MP/2023, submitted that the Petitioner therein has also raised an argument with respect to the CEA's authority to issue the WGR, 2022. Learned counsel sought liberty to address the same, if at all, the Petitioner still wishes to pursue the said argument. In response, learned counsel for the Petitioner submitted that, unlike the other Petitions, this Petition does not raise a Change in Law claim in respect of WGR and has been filed challenging the disconnection notice on the basis of working group report and seeking extension of time to install the dynamically varying reactive power compensation device, and as the disconnection notice issued by SRLDC has been withdrawn, accordingly, no further cause of action survives in that regard. The Petitioner *per se* is not challenging or impugning the WGR. In response, the learned counsel for the Respondent, CTUIL, submitted that, in view of the clarification provided, and since the Petitioners do not appear to be pursuing the challenge to the constitution of the Working Group or the preparation of the report by the CEA, CTUIL has nothing further to add at this stage.

7. Learned counsel for the Respondent, GRIDCO, in Petition No. 82/MP/2024, adopted the submissions of other Respondents. Similarly, the learned counsel for the Respondent, MPPMCL, in Petition Nos. 139/MP/2024 and 145/MP/2025 adopted the submissions of co-Respondents in the matter.

8. Learned counsel for the Petitioner in Petition No. 124/MP/2024 pointed out that apart from the WGR issue, the Petition also raises certain other Change in Law claims, which may be considered by the Commission at an appropriate stage.

9. Learned senior counsel for the Petitioners in Petition Nos. 116/MP/2025 and 2 Ors. requested the opening of the e-filing portal for filing the compliance affidavits in these matters in terms of the directions issued *vide* Record of Proceedings dated 18.11.2025. The learned senior counsel also sought liberty to file a note of arguments/submissions in the matters to assist the Commission in the adjudication of the batch matters.

10. Learned counsel for the Petitioners in Petition Nos. 49/MP/2024, 115/MP/2025, 117/MP/2025 and 146/MP/2025 submitted that a consolidated compliance affidavit has been filed in these cases in compliance with the directions issued *vide* RoP dated 18.11.2025. The learned counsel also submitted that Clause A1(5) of Part II of the Schedule to the CEA (Technical Standards for Connectivity to the Grid) (Amendment) Regulations, 2013 is applicable to generating stations other than wind generating stations and generating stations using inverters. The term "*at rated output*" has been expressly used in the said clause. Further, Clause B2(1) of Part II of the Schedule to the CEA (Technical Standards for Connectivity to the Grid) (Amendment) Regulations, 2013 applies to wind generating stations and generating stations using inverters. In this clause, the term "*rated output*" is not mentioned. He also submitted that, under this framework, the generator, dynamically varies active power at all points of time in order to maintain the requisite reactive power support. Accordingly, when generators stated that they were not considering anything specific, it implied that the inverters or wind turbine generators (WTGs), *per se*, were capable of providing the required reactive power by reducing active power generation. He added that the concept of "*rated power*" has now been introduced, which, according to the Petitioners, has changed the operating dynamics.

11. Learned counsel for the Petitioners in Petition Nos. 236/MP/2023 and Ors. sought liberty to make oral submissions in their rejoinder in these matters on the next date of hearing. Learned counsel further sought liberty to file a brief note of arguments in these matters. The learned counsel for the Petitioner in Petition No. 585/MP/2025 also made a similar request seeking liberty to make brief oral submissions on the next date of hearing.

12. After hearing the learned senior counsel and learned counsels for the parties, the Commission directed the Petitioners and Respondents in the captioned matters to file their respective compliance affidavits in terms of directions issued vide RoP for hearing dated 18.11.2025, if not already done so, within three weeks. The Parties were also permitted to file their respective brief note of submissions/arguments (not exceeding three pages) within three weeks.

13. The matters remained part-heard and will be listed for the rejoinder submissions of the Petitioners on **17.3.2026 at 2.30 P.M.**

By order of the Commission

**Sd/-
(T.D. Pant)
Joint Chief (Law)**