

CENTRAL ELECTRICITY REGULATORY COMMISSION

NEW DELHI

Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2026

No. L-1/261/2021/CERC

Dated: 16.06.2026

Explanatory Memorandum

Background

1. The Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2022 were notified on 7th June, 2022 and subsequently the first, second and third amendments were notified on 1st April 2023, on 19th June 2024 and on 31st August 2025, respectively (hereinafter collectively referred to as “GNA Regulations”).
2. The draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2026 (hereinafter ‘draft Fourth Amendment’) has been issued keeping in view various challenges and requirements raised by stakeholders, briefly noted as under:
 - a) Post notification of the third amendment to the GNA Regulations on 31.08.2025, some suggestions were received from the Ministry of New and Renewable Energy (MNRE), CTUIL, RE Developers and RE Associations to address certain concerns.
 - b) A Suo Motu Order dated 08.12.2025 in 14/SM/2025 was issued under the GNA Regulations in light of difficulties raised by CTUIL/ other stakeholders. Under the said Suo Motu Order, some issues were covered as one-time clarifications, and some clarifications are required on an ongoing basis under the GNA Regulations. Such ongoing points are included in the draft Fourth Amendment.
 - c) A few issues brought to our attention by way of Petitions filed by

stakeholders, are also covered under the draft Fourth Amendment.

3. The explanations for each of the proposed amendments are covered in detail in the subsequent paragraphs. However, the broad amendments proposed are as follows:
- a) Entity may seek withdrawal of its Connectivity application with return of all BGs, if the time period between the likely start date of connectivity intimated in the in-principle grant of Connectivity and start date of Connectivity intimated in the final grant of Connectivity (tentative or firm), is two years or more.
 - b) The Standalone ESS seeking Connectivity shall have a minimum storage discharge (in MWhr) of twice the Connectivity quantum.
 - c) Any generating station, including REGS or ESS, may seek connectivity for non-solar hour access on locations other than those covered under clause (a) of Regulation 4.5.
 - d) Installed capacity for meeting technical compliances at the Point of Injection (POI) shall not be counted under Installed capacity for the purpose of seeking Connectivity at ISTS (already covered under Order in 14/SM/2025).
 - e) Application applied under Regulation 5.2 shall also be liable for payment of the application fee.
 - f) LAND BG for the capacity under Regulation 5.2 may be furnished by the existing Connectivity grantee or the entity implementing such additional capacity.
 - g) ESS under Regulation 5.2 may install REGS only for charging the ESS with no compliance required towards the land requirement and FC achievement.
 - h) If the Connectivity granted to an entity covered under Regulation 4 is relinquished or revoked, the corresponding Connectivity for the additional capacity under Regulation 5.2 shall also be revoked.
 - i) In case additional capacity applied under Regulation 5.2 does not result in additional solar hour access or non solar hour access, there is no requirement to furnish documents in terms of clause (xi)(a) of Regulation 5, SCOD of such additional capacity and the provisions under Regulations 11A, 11B and 24.
 - j) Modification in Regulation 5.6 - Any generating station may seek connectivity at the switchyard of the generating station.
 - k) In case of a multi-location project specified under LoA/PPA, Connectivity can be sought at such locations on LoA/PPA based on such single LoA/PPA
 - l) Quantum of Land BG for ESS (excluding PSP) will be reduced to Rs. 5 lakh/MW in

place of the existing Rs. 10 lakh/MW.

- m) Closing of the Connectivity applications for which the Nodal Agency is not able to plan the required transmission system.
- n) For cases where augmentation is required for the grant of Connectivity, the in-principle grant of connectivity shall be issued only after approval of such augmentation.
- o) Modification in the timeline for seeking a change in the source. An entity can seek a change in source two times, with a payment of Rs. 50000/MW for seeking a change in source for the second time.
- p) The provision under Regulation 11A(1) shall also cover the entity which has been issued an in-principle grant of connectivity (already allowed vide Order dated 8.12.25 in 14/SM/2025).
- q) The entity covered under clause (a) of Regulation 5.8(xi) shall be required to furnish the land documents in terms of clause (b) of Regulation 5.8(xi).
- r) For all types of Connectivity grantee, Financial Closure documents along with the net worth and other details as per the Detailed Procedure shall be furnished within 15 days of the effective date of GNA.
- s) Conversion of Connectivity covered under clause (b) or (c) to clause (a) under Regulation 5.8(xi) shall be allowed only on the basis of PPA and not on the basis of LoA.
- t) Entity may seek conversion of connectivity from clause (b) or (c) to clause (a) under Regulation 5.8(xi) based on the PPA entered by its subsidiary or subsidiary of the same parent company.
- u) An entity which has only been issued an in-principle grant of Connectivity shall also be covered under Regulation 11A(6). Further, the Connectivity can be transferred after CoD in cases where the applicant's change in control takes place in terms of Reg 11A(6).
- v) Con-BG2 and Conn-BG3 shall be returned after one year of the declaration of COD of the generating stations.
- w) A drawee entity connected to an intra-State transmission system or a distribution system may seek to connect to ISTS directly as an applicant under Regulation 17.1(iii), and vice versa.
- x) One time GNA charges are to be furnished within 15 days of the effectiveness of the

GNA.

- y) In case where an element of augmentation, identified for grant of connectivity to an entity, which is under RTM, the Nodal Agency shall consider the date of issuance of the certificate of completion by CTU under the Grid Code for the purpose of the date of effectiveness of the GNA of such Connectivity grantee.
- z) Transfer of GNA- In case of selling out of the load from the original GNA grantee to another entity, after the effectiveness of the GNA, the corresponding GNA with the load can also be transferred to such new entity now owning the load.
- aa) In light of the Second Amendment to the CERC (Cross Border Trade of Electricity) Regulations, 2019 (hereinafter referred to as “Cross Border Regulations”), removing the provisions in respect of cross-border transactions from the GNA Regulations.
- bb) Transition provision in respect of the proposed draft Fourth Amendment
- cc) Where multiple applications are received at a substation in the same month, including applications for source change and applications under Regulations 5.2 and 5.11, the timeline for processing such applications shall be the maximum processing timeline of any of the applications.

Definition of Land BG at clause (w-i) of Regulation 2.1

- 4. Clause (vii)(c) and (xi)(c) of Regulation 5.8 provide that an applicant can seek connectivity based on the submission of a Bank Guarantee in lieu of the submission of a land document for 50% of the land required for the capacity for which Connectivity is sought. Further, such an entity is required to furnish the land document within the stipulated time as provided under clause (1) of Regulation 11A, and, subsequent to the furnishing of the land Document, the above-mentioned BG shall be returned to the entity. As this Bank Guarantee is submitted in lieu of the land document, it is proposed to be defined as “Land BG” for use under different provisions of the GNA Regulations, for easy reference. Accordingly, the definition of “Land BG” has been incorporated at clause (w-i) of Regulation 5.2 of the GNA Regulations.

New Regulation 3.10

- 5. An applicant vide its letter dated 01.05.2026 has submitted that one of its projects was granted in-principle connectivity in May 2025 with a scheduled commencement date of 1st January 2028 and based on this approval, Bank Guarantees of approximately 40
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Crore were submitted, however, it has now come to their attention that commercial operation date of the transmission system has recently been postponed to 31st March 2030 and the associated infrastructure is expected to be commissioned beyond 2030. These developments have materially altered the project's feasibility, making it unviable.

6. We have noted the issues flagged by the stakeholder. We have noted in various Petitions filed before the Commission that there is a significant delay in the issuance of the final grant of Connectivity to an applicant which has already been issued an in-principle grant of Connectivity. In some of the cases, CTUIL has submitted that for the cases where the augmentation to the ISTS is required for the grant of Connectivity, the firm start date of connectivity can be assessed by CTUIL only after the award of such augmentation. In other cases, there have been delays in the issuance of the final grant of Connectivity, even when the Connectivity was on an existing system. We note that an entity is required to be informed of the start date of Connectivity in a timely manner, and there should not be too much uncertainty in such cases where "likely start date of connectivity is 2028' whereas the firm start date conveyed is beyond 2030. CTUIL should also endeavour to issue the likely start date in in-principle Connectivity after due prudence, such that stakeholders do not raise issues as noted in Para 5 above.
7. Considering the above discussion, a new Regulation 3.10 has been proposed to be added:

"3.10 Notwithstanding anything contained in Regulations 3.7 to 3.9 of these Regulations, in case the time period between 'likely start date of connectivity' intimated in in-principle grant of Connectivity and start date of Connectivity intimated in final grant of Connectivity (tentative or firm), is two years or more, the entity shall be eligible to seek withdrawal of full Connectivity quantum with return of all BGs (Conn-BGs and Land BG, as applicable), subject to the condition that such request is made to the Nodal Agency within a period of 30 days from intimation of final grant of Connectivity.

Amendment to Regulations 6.3 and 7.2

8. CTUIL, in Petition No. 666/MP/2025, has flagged the difficulties in the planning the additional transmission system due to the Load Generation balance issue and the difficulty in issuing a final grant of connectivity for such cases. Commission referred the matter to CEA vide RoP of hearing dated 19.12.2025 and 25.02.2026 for CEA's input on the planning issue raised by the CTUIL. However, no input was received from the CEA. The relevant extract of the Commission Order dated 10.04.2026 in Petition

No. 666/MP/2025 is extracted below:

“..

“(h) In addition to above, applications to the extent of 60 GW have been received including the Petitioner’s application for grant of Connectivity and are at different stages of process. CTUIL is facing challenges/difficulties in identification of corresponding transmission system for above 60 GW applications towards integration/ evacuation and supply of power to load centres.

.....

(j) There is no regulatory provision of denial of the connectivity. Further, vide 3rd amendment, provisions have been made that too provides only closure of applications upon identification of transmission system and denial of approval by the competent authority to approve such transmission system. This puts onus on CTU to first identify the system, refer them to various forums for consultation/ recommendations and only on denial of approval by competent authority can close the applications.

(k) In the above circumstances, this Commission may issue necessary direction towards treatment of the similarly placed Applications at various proposed ISTS pooling stations i.e. Bikaner-V, Barmer-III, Barmer-IV, Bhadla-IV, Bhadla-V, Ramgarh-II, Ramgarh-III, Jalore, Sanchoe & Pali where In-Principle intimations have been issued, however, CTUIL is not in a position to issue the Final Grant of Connectivity due to above issues.

.....

40. However, upon careful consideration of the peculiar facts and circumstances of the present case, we find that CTUIL has raised a larger issue of transmission planning and its inability to issue final grant of Connectivity. The matter of load-generation balance has been referred to CEA for their inputs vide ROP for hearing dated 19.12.2025 and further vide letter dated 25.02.2026 on which no suggestions have been received on this planning aspect from CEA yet. In such circumstances of planning uncertainty, we are of the view that Petitioner’s difficulty may be considered under Regulation 42 of the GNA Regulations under ‘Power to remove difficulty’.

41. Considering the above, **we, in the exercise of our powers under Regulation 42 of the GNA Regulations, allow the Petitioner an option to withdraw its connectivity application within a period of three months from issuance of this Order with a condition that if the Petitioner exercises option to withdraw its connectivity application, the Land BG amounting to Rs. 40 crores as well as full Conn-BGs (Conn-BG1, Conn-BG2, Conn-BG3) shall be returned by CTUIL to the Petitioner within 15 days of such withdrawal, with forfeiture of 50% application fee. Balance 50% application fee shall be returned as per provision of Regulation 3.7.1 of the GNA Regulations. However, if Petitioner decides to continue with instant application, the Land BG and Conn-BGs shall continue to be retained by CTUIL in accordance with the applicable regulatory framework.”**

As per above, an option has been given to such entities where CTUIL is not able to plan a system with the return of all Conn-BGs.

9. The issue raised by the CTUIL in Petition No. 666/MP/2025 has also been raised by CTUIL in the MoP meeting held on 29.04.2026 with representatives of MoP, CEA and

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CTUIL, the relevant extract of the MoM of this meeting issued on 06.05.2026 quoted as under:

“2. Central Transmission Utility of India Limited (CTUIL) made a presentation (Annexure-II) on the issues being faced in identification of transmission systems and grant of Connectivity. It was explained that, in certain RE complexes in Rajasthan (NR) and Gujarat and Maharashtra (WR), in-principle Connectivity had been granted with tentative transmission systems and tentative start dates.

It was further highlighted that the CERC Connectivity and General Network Access Regulations, 2022 mandate grant of in-principle Connectivity within 60 days (in case of existing ISTS) and 90 days (where augmentation is required). However, the in-principle Connectivity granted during the past 1-2 years could not be converted into final Connectivity, as CTU has been unable to finalize the transmission systems due to the absence of corresponding load centres /suitable landing points. The Regulation mandated timelines for grant of connectivity could not be adhered to due to the issue as mentioned above.

On one hand, CTU is presently not in a position to issue final grant of connectivity; on the other hand, connectivity applications continue to be received on a regular basis, resulting in a backlog of approximately 128 GW of connectivity applications. A significant proportion of these applications are concentrated in major RE complexes such as Khavda, Kutch in Gujarat and Bhadla, Bikaner, Fatehgarh/Ramgarh, and Barmer in Rajasthan. CTUIL stated that there is a need to amend the CERC Connectivity Regulations so as to enable CTUIL to close the connectivity applications where the transmission system could not be identified.

3. Planning of the transmission system is done by CTUIL through internal studies, deliberation in the regional Consultation Meeting for Evolving Transmission Schemes (CMETS), and accordingly in-principle grant of Connectivity was given. With this approach, about 53 GW of in-principle Connectivity was granted in Rajasthan/Gujarat/Maharashtra; out of which Transmission Systems corresponding to about 20 GW were conceptualised and put up for finalisation/approval in RPC/NCT. However, CTU is facing difficulties in finalisation of the Transmission Systems for the remaining 33 GW due to various factors i.e., limited load growth & all India absolute generation surplus in Solar hours, uncertainty in bulk loads like Green Hydrogen / Green Ammonia & Data centres, no enhancement in GNA by States, technical minimum of thermal units etc. As per CTUIL, the transmission system required for integration & evacuation of power from these additional RE generations is only feasible through long-distance HVDC systems (subject to the identification of landing points) and is cost-intensive.

4. CTU informed that the final grant of Connectivity is issued only upon SPV transfer to the successful Transmission Service Provider (TSP) and indicating the firm start date of Connectivity. Presently, CTU is not issuing any in-principle grant of connectivity until the proposed transmission system is identified and approved by the competent authority. In view of the said procedure for the grant of connectivity, CTU requested the requisite amendments to the CERC Regulations.

5. After detailed deliberations following Action Points were emerged:

.....

(iii) Matter raised by CTUIL for amendment to CERC Connectivity and General Network Access Regulations, 2022, to be referred to CERC for necessary amendment for:- - Rationalizing the timelines for the grant of connectivity -

Enabling CTUIL to close the connectivity applications where the transmission system could not be identified due to technical constraints.

.....”

10. Subsequently, MoP requested CERC to consider the discussions between CEA, CTUIL and MoP held on 29.4.2026 and the suggested way forward for incorporation in the GNA Regulations.
11. We note that transmission planning is carried out by CTUIL in consultation with CEA and other stakeholders in accordance with Section 38 of the Act, read with Electricity (Transmission System Planning, Development and Recovery of Inter-State Transmission Charges) Rules, 2021 issued on 1.10.2021 by MoP. The Rules are provided as under:

“(3) The Central Transmission Utility shall draw up plan for Inter-State Transmission System for upto next five years on rolling basis every year identifying specific transmission projects which are required to be taken up along with their implementation time lines, after considering the plans made by Central Electricity Authority and studying the progress in generation capacity and demand in different parts of the country as well as taking note of General Network Access requests made by Designated Inter-state Customers, any signals of any congestion in any part of the Inter-State Transmission System and difficulties in obtaining right of way for development of transmission corridors. For preparing this plan, Central Transmission Utility shall consult with State Transmission Utilities, Central Government, State Governments, generating companies, Regional Power Committees, Central Electricity Authority, System Operators, licensees and any other person notified by the Central Government in this behalf.

(4) The principle for planning of the Inter-State Transmission System shall be to ensure that it is available as per the requirements of the States and the generators, as reflected by their General Network Access requests and the planning should be such that the lack of availability of the transmission system does not act as a brake on the growth of different regions. The transmission system shall, be planned and developed matching with growth of generation and load, as far as possible and while doing the planning, care shall be taken that there is no wasteful investment.

(5) The Inter-State Transmission System projects drawn up by Central Transmission Utility shall be placed before the National Committee on Transmission constituted by the Central Government and the National Committee on Transmission shall also include a nominee of each Regional Power Committee. The projects along with their timeline for implementation shall be approved by the Central Government after considering the recommendations of the National Committee on Transmission:

Provided that the Central Government may approve any transmission project as deemed necessary from the system or strategic point of view, without waiting for the recommendation of the National Committee on Transmission.

Provided further that the Central Government may delegate powers to the National Committee on Transmission and Central Transmission Utility for approving Inter-State Transmission System projects subject to the cost limits specified by the Central Government from time to time.”

As per the above, transmission projects, along with their timelines, are required to be approved by the Central Government or, as delegated by it.

12. Considering that the transmission augmentation is planned as per the abovesaid Rules, and that augmentation is to be approved by the Central Government or its delegated entity, issues raised by CTUIL and discussed in MOP along with CEA, where it has been suggested to close the application where the transmission system could not be identified due to technical constraints it is proposed that for the cases where the Nodal Agency is not able to plan the transmission system the associated connectivity applications may be closed.

13. We note that Regulation 6.3 and Regulation 7.2 of the GNA Regulations provide as follows:

“6.3. In case identified augmentation (with or without ATS) is not approved by the authority competent to approve such augmentation, the associated application(s) shall be closed by the Nodal Agency and all the bank guarantees furnished, if any, shall be returned. The detailed modalities shall be in terms of a detailed Procedure to be published by the Nodal Agency after public consultation.

..

7.2 In case the Nodal Agency, after the interconnection study undertaken in accordance with Regulation 6.1 of these regulations, determines that augmentation (with ATS or without ATS) is required, the Nodal Agency shall intimate in-principle grant of Connectivity to the Applicant within 90 days from the last day of the month in which the application had been received.”

As per the above, for cases where augmentation (with or without ATS) is required, the Nodal Agency is required to issue the intimation of in-principle grant of Connectivity within 90 days from the last day of the month in which the application was received. For the cases where augmentation is not approved by the competent authority, CTUIL shall close such applications.

14. It is proposed that for the cases where augmentation (with ATS or without ATS) is required for the grant of Connectivity, the intimation of in-principle grant of connectivity may be issued after the approval of the identified augmentation by the competent authority.

15. Further considering the issue raised by stakeholder and the operational challenges highlighted by CTUIL, for the cases where in-principle grant has already been issued and either the final grant of connectivity has been issued with significant delay or is yet to be issued, there may be a situation where project planned by entity based on the tentative start date of connectivity intimated under the in-principle grant of Connectivity, may not be viable or convenient for the start date of Connectivity (which is significantly later than the earlier tentative start date) mentioned under final grant of Connectivity.

The entity may not be interested in implementing the project anymore and intends to seek the withdrawal of the Connectivity application.

16. Considering the above issue, we are of view that in case where such difference in the tentative start date of connectivity mentioned in the in-principle grant of Connectivity and the start date of Connectivity mentioned under the final grant of Connectivity is two years or more, the concerned entity should be given an option to withdraw the application without any financial implications, i.e. the total Conn-BGs will be returned. However, such flexibility should be availed by the concerned entity within a limited time period, i.e. within 30 days of intimation of final grant, so that the same capacity can be utilized to grant Connectivity to some other applicant to ensure the timely utilization of the transmission system.
17. Considering the above discussion, a new Regulation 3.10 has been proposed to be added, and the necessary amendment has been proposed to be incorporated in Regulations 6.3 and 7.2, as under:

“3.10 Notwithstanding anything contained in Regulations 3.7 to 3.9 of these Regulations, in case the time period between ‘likely start date of connectivity’ intimated in in-principle grant of Connectivity and start date of Connectivity intimated in final grant of Connectivity (tentative or firm), is two years or more, the entity shall be eligible to seek withdrawal of full Connectivity quantum with return of all BGs (Conn-BGs and Land BG, as applicable), subject to the condition that such request is made to the Nodal Agency within a period of 30 days from intimation of final grant of Connectivity.

.....

6.3 In case the Nodal Agency is unable to carry out the interconnection study to identify the requirement of augmentation to the existing ISTS, if any, for enabling transfer of power over ISTS under General Network Access (within the timeline provided in Regulation 7.2 of these regulations) or the identified augmentation (with or without ATS) is not approved by the authority competent to approve such augmentation, the associated application(s) shall be closed by the Nodal Agency and all the bank guarantees furnished, if any, shall be returned. The detailed modalities shall be in terms of a detailed Procedure to be published by the Nodal Agency after public consultation.

.....

7.2. In case the Nodal Agency, after the interconnection study undertaken in accordance with Regulation 6.1 of these regulations, determines that augmentation (with ATS or without ATS) is required, the Nodal Agency shall intimate in-principle grant of Connectivity to the Applicant within 90 days from the last day of the month in which the application had been received, or approval of the identified augmentation by the authority competent to approve such augmentation, whichever is later:

.....”

Amendment to Regulation 4.1, Regulation 5.2, and Regulation 5.4 (Minimum discharge for the ESS seeking Connectivity for full day access or for non-solar hour access)

18. For optimal utilization of the transmission system, the Commission has enabled the provisions of solar hour access and non-solar hour access vide the third amendment to the GNA Regulations. Non-solar hour access, inter alia, can be sought by an ESS. Since non-solar hours may be more than 10 hours in a day, an ESS with a maximum injection requirement equal to the connectivity quantum may utilize the transmission system for a limited duration in case the MWhr for such ESS is limited. Therefore, it is proposed that, if the ESS seeks the Connectivity for non-solar hours under Regulation 5.11, it shall have a minimum discharge (in MWhr) of twice the connectivity quantum, i.e. at least having 2 hours of discharge capacity. A similar provision is introduced for ESS under Regulation 5.2 or under Regulation 4.1 with full-day access.
19. Accordingly, necessary amendments have been proposed in clause (c) of Regulation 4.1, in the main Paragraph of Regulation 5.2. and a new proviso to Regulation 5.4 proposing that ESS shall have a minimum discharge (in MWhr) of twice the quantum of Connectivity sought

New Regulation 4.7

20. Regulation 4.5 of the GNA Regulations provides as under:

“4.5. A REGS based on a Wind source or ESS with an installed capacity of 50 MW and above individually or with an aggregate installed capacity of 50 MW and above through a Lead Generator or a Lead ESS, as the case may be, may seek Connectivity:

(a) for non-solar hour access under Regulation 5.11(a) of these regulations read with Regulation 4.1 of these regulations, on the substations identified under Annexure-IV to these regulations. Or

(b) full day access under Regulation 4.1 of these regulations.”

As per the above, a REGS based on a Wind source or ESS can seek Connectivity for non solar hour access only at the substations identified under Annexure-IV to the GNA Regulations.

21. Clause (3) of Annexure-IV provides as under:

“(3) The Nodal Agency, within 30 days of notification of these amendments, shall publish the following list and shall update the same on a monthly basis:

(a) Substation-wise details of entities who have been intimated in- principle grant of connectivity, final grant of connectivity, whose GNA is effective under clause (a) to (c) of Regulation 5.11 of these Regulations, including quantum of Connectivity granted and their source wise configuration.

- (b) *the vacant bay(s), if any, available at the substations covered under sub-clause (a) of this clause, where Connectivity can be granted to an Applicant covered under Regulation 5.11(a) of these regulations.*
- (c) *Substation wise and bay-wise details of non-solar hours Connectivity quantum available for the grant under Regulation 5.11(a) of these regulations.*

As per the above, the Nodal agency shall publish the details of the substation for which non-solar-hours Connectivity quantum is available for grant under Regulation 5.11(a).

22. A REGS based on a Wind source or ESS may wish to seek Connectivity at the substation other than the substations identified under Annexure-IV of the GNA Regulations, such as behind a conventional generating station. The CERC Tariff Regulations include a provision where ESS can be installed in a thermal generating station. Such substations/switchyards are not covered under Regulation 5.11(a), where specifically non-solar access has been released due to the transition of solar-based Connectivity. An ESS may wish to seek full day access or only non-solar hour access where it wishes to inject power during non-solar hours. Accordingly, REGS based on Wind or ESS which wish to seek Connectivity only for non solar hour access at a substation not in the list of the substation identified in terms of Annexure-IV of the GNA Regulations, can seek Connectivity with non solar hour access at such substation. It is also proposed that CTUIL will process such an application under the provisions applicable for the entity covered under clause (c) of Regulation 5.11, except that such application shall be processed for non solar hour access in place of solar hour access. Accordingly, the addition of a new Regulation 4.7 has been proposed under the draft Fourth Amendment, as under:

“4.7 Any generating station including REGS or ESS who wishes to seek only non-solar hour access on location other than covered under clause (a) of Regulation 4.5 of these regulations, but not full day access, shall be eligible to seek such non-solar hour access which shall be processed as per clause (c) of Regulation 5.11 of these regulations except the difference that it shall be processed for non-solar hour access in place of solar hour access.”

Amendment to Regulation 5.1 and addition of new clause (n) in Regulation 5.2

23. Based on stakeholders' requirements, vide Order dated 08.12.2025 in 14/SM/2025 it was clarified that there shall not be any requirement of furnishing additional Conn-BGs and compliance of Regulation 5.8 of the GNA Regulations for the additional capacity to meet the reactive power compensation, internal losses (DTL loss), or any other technical compliance at the Point of Injection (POI), either applied under Regulation 5.1 or applied under Regulation 5.2. The relevant extract of the said Order is extracted as under:

“20. The RE Developers have submitted that they need to install additional inverters to meet the reactive power compensation at PoI and install additional capacity to meet the internal losses (DTL loss). It has been informed by CTU that such additional inverter capacity for reactive power compliance or losses is added at the time of taking Conn-4 approval. However, the same may need to be applied in application while seeking Connectivity under Regulation 5.1.

21. We are of the view that such additional capacity which has been installed to meet reactive power compliance or for meeting losses or any other technical compliance should not be considered as an additional capacity for purpose of seeking additional Conn-BGs, as capacity under Regulation 5.2 of the GNA Regulations.

22. Considering the above and in the interest of the sector, we relax the provision under Regulation 5.1 of the GNA Regulations only for the REGS and allow the RE Developers to install additional inverters, WTGs, or equivalent equipment for meeting technical compliances at the Point of Injection (POI). There shall not be any requirement of furnishing additional Conn-BGs and compliance of Regulation 5.8 of the GNA Regulations for such additional capacity to meet the reactive power compensation, internal losses (DTL loss), or any other technical compliance at the Point of Injection (POI), either applied under Regulation 5.1 or applied under Regulation 5.2.”

24. To incorporate the above directions, the following proviso has been proposed under Regulation 5.1:

“Provided also that installed capacity for meeting technical compliances at the Point of Injection (POI) shall not be counted under Installed capacity for purpose of seeking Connectivity at ISTS.”

A similar provision has also been proposed under Regulation 5.2.

25. Regulation 5.2 provides that an entity covered under Regulation 4 can seek approval for an additional capacity within the quantum of Connectivity granted. Since the addition of ESS or Wind under regulation 5.2 leads to additional rights to non-solar hours, strict compliance has been mandated to ensure commitment. However, there may be cases where such additional capacity is required, but does not result in additional rights to non-solar hours access or solar hour access. In such cases, strict compliance with the timelines of COD or land, PPA, Financial Closure, etc, is proposed to be done away with for ease of doing business. A new sub-clause (n) has been proposed to be added to Regulation 5.2 for covering this requirement.

Amendment to clause (a) of Regulation 5.2 -

26. CTUIL, as the implementing agency, had informed that entities making application for additional capacity under Regulation 5.2 have been furnishing the application fee in accordance with Regulation 3.2 of the GNA Regulations. The same is included in the detailed procedure issued by the CTUIL. For clarity on the application fee, it is

proposed to include a clear provision towards the requirement to pay the application fee under Regulation 5.2. Accordingly, the necessary modification has been proposed under clause (a) of Regulation 5.2.

Amendment to clause (h) of Regulation 5.2 -

27. The existing clause (e) of Regulation 5.2 provides as under:

*“(e) **Connectivity Bank Guarantee (Conn-BG1 and Conn-BG3) as per Regulation 8 of these regulations shall be furnished for such additional capacity (by the existing Connectivity grantee or the entity implementing the additional capacity)** within one month of intimation of in-principle grant of Connectivity, failing which the Nodal Agency shall revoke the in-principle approval for additional capacity:*

As per the above, Conn-BGs for capacity under Regulation 5.2 can be submitted either by the existing Connectivity grantee or the entity implementing the additional capacity. It was been suggested to the Commission that Land BG may also be furnished by the entity implementing the project on the same basis.

28. Considering the suggestions, it is proposed that the entity implementing the project may furnish the Land BG for Connectivity applied under Regulation 5.2. Accordingly, the necessary amendment has been incorporated in clause (h) of Regulation 5.2.

New clause (l) of Regulation 5.2 –

29. Sub-clause (l) of Clause (1) of Annexure-IV of the GNA Regulations provides as under:

*“(l) **In case, the entity seeking connectivity under Regulation 5.11(a) of these regulations, is an ESS, it may install REGS for the purpose of charging such ESS only. The Installed capacity of such REGS shall be indicated in the application and such REGS shall not be required to furnish documents of Land under Regulation 5.8 or Financial Closure under Regulation 11A of these regulations.**”*

As per the above, if an ESS seeks connectivity under Regulation 5.11(a) (for non solar hour access), it can install REGS for the purpose of charging the ESS only; such REGS shall not be required to furnish land documents, Financial Closure documents under Regulation 11A.

30. EDEN Renewable vide its letter 10.11.2025 and NSEFI vide letter dated 11.11.2025 & letter dated 01.12.2025 have submitted as under:

“As per Annexure IV, Point 1 (l) of the amendment, in accordance with Regulation 5.11(a), where an ESS applies for connectivity, it may establish a Renewable Energy Generating Station (REGS) solely for charging the ESS. The installed capacity of such REGS is to be declared in the application, and submission of land documents under Regulation 5.8 or financial closure details under Regulation 11 A

shall not be required. It is requested that this exemption be explicitly reflected so as to cover all similar cases, including applications under Regulation 5.2, to ensure uniform applicability across both co-located and standalone project configurations.”

As per the above, it has been requested to include enablement under Regulation 5.2 for connecting REGS solely for charging the ESS, as already introduced in sub-clause (l) of clause (1) of Annexure IV under the third amendment of the GNA Regulations.

31. Accordingly, a necessary provision in this regard has been proposed to be incorporated at clause (l) of Regulation 5.2.

New clause (m) of Regulation 5.2

32. Regulation 5.2 provides as under:

“5.2 Notwithstanding anything contained in Regulation 5.1, an entity covered under Regulation 4 of these regulations, with prior approval of the Nodal Agency, within the quantum of Connectivity granted to it, shall be eligible to install, additional generation capacity, or ESS, including the capacity owned by any other entity with the following conditions:

.....

(c) The net injection at any point in time shall not exceed the quantum of net injection allowed (within the quantum of Connectivity granted) to the existing Connectivity grantee.”

As per the above, an entity covered under Regulation 4 may seek approval of the Nodal Agency, within the quantum of Connectivity granted to it, for adding additional generation capacity or ESS. Further, net injection at any point in time shall not be allowed more than the existing connectivity granted.

33. Under Regulation 5.2, the scheduling rights are with the original Connectivity grantee for its own capacity as well as additional capacity under Regulation 5.2. Such an original grantee only applies to the Nodal Agency seeking approval for additional capacity. Hence, the additional capacity is not granted any Connectivity independent of the original grantee. Scheduling is performed by the original grantee in accordance with the agreement between the original grantee and the entity implementing the additional capacity.
34. On the effectiveness of the third amendment under which a huge number of entities have sought to add capacity under Regulation 5.2, have sought clarity on what will happen to the Connectivity of the capacity under Regulation 5.2, if the Connectivity of the original Connectivity grantee is revoked or relinquished. Since the additional capacity depends on the original grantee and does not have any independent rights of

its own, it is proposed that the capacity under Regulation 5.2 shall stand revoked or relinquished in case the original Connectivity grantee is revoked.

35. It may be argued that additional capacity should be given a chance to replace the original Connectivity grantee, which means it should be extended independent Connectivity rights in case of revocation or relinquishment of the original grantee. Such a proposition may lead to a situation where an entity can bypass the general process for the date and time stamp of the application for the grant of Connectivity. An entity may seek Connectivity under Regulation 5.2 and then get independent Connectivity, thereby jumping the queue to secure the Connectivity through this option.
36. Therefore, it is proposed that in case of revocation of Connectivity or relinquishment of Connectivity of the existing Connectivity grantee, the Connectivity of the capacity under Regulation 5.2 shall also stand revoked or relinquished. Accordingly, a provision in this regard has been proposed as a new clause (m) in Regulation 5.2.

Amendment to Regulation 5.6

37. NTPC vide letter dated 06.04.2026 has submitted as under:

“1. NTPC has submitted connectivity application ID: 200003012. dated 27.01.2026. seeking ISTS connectivity for its Darlipali Stage-II (1x800 MW) unit under Regulation 4.1(i) for a quantum of 400MW at the existing Darlipali Stage-1 (2x800 MW) generation switchyard. which is already connected to ISTS. Additionally. separate application for intra-state connectivity for the balance quantum of 400 MW has been applied to OPTCL (STU) as per provisions of the Grant of Connectivity & GNA to ISTS Regulations, 2022

2. During discussions in the 53rd CMETS-ER meeting held on 30.03.2026, CTUIL informed that. subsequent to the notification of the 3rd Amendment to the principal regulations and changes made in regulation 5.6, grant of connectivity at the switchyard of an existing generating station is applicable only for applicants covered under Regulation 4.1(e), i.e., Renewable Energy Generating Stations (REGS) or standalone Energy Storage Systems (ESS).

.....

5 Before the notification of the CERC Connectivity & GN A Regulations, 2022, and prior to the 3rd Amendment of the present Regulations. NTPC has been granted connectivity for its expansion next stage projects at existing generation switchyards connected to ISTS. In the 3rd Amendment, in Regulation 5.6, under clause (ii), the addition of the phrase “application under Regulation 4.1 (e)” provides a restrictive interpretation, resulting in ambiguity regarding the eligibility of thermal generating units to seek connectivity through the existing generation switchyard infrastructure.

6. Hence. suitable clarification or guidance may be provided to CTUTL in this context for grant of connectivity to expansion/next stage generating stations at existing generation switchyards. based on the margins available in the existing transmission system and within technical feasibility, thereby facilitating optimal utilization of existing assets without the need for separate switchyard and transmission infrastructure for evacuation of power from expansion projects.”

As per the above, NTPC has requested to allow the grant of Connectivity for the expansion/next stage generating stations at existing generation switchyards, based on the margins available in the existing transmission system to facilitate optimal utilization of existing assets without the need for separate switchyard and transmission infrastructure.

38. In light of the above-referred NTPC letter, we have perused clause (e) of Regulation 4.1 and Regulation 5.6, which provide as under:

Clause (e) of Regulation 4.1

“(e) REGS or standalone ESS with an installed capacity of 5 MW and above applying for grant of Connectivity to ISTS through the electrical system of a generating station already having Connectivity to ISTS:

.....”

Regulation 5.6

*“5.6. An Applicant may apply for grant of Connectivity at (i) a terminal bay of an ISTS sub-station already allocated to another entity which has been intimated in-principle or final grant of Connectivity under Regulation 4 of these regulations or **(ii) switchyard of a generating station having Connectivity to ISTS [application under Regulation 4.1 (e)]**, or (iii) a terminal bay of an ISTS sub-station already allocated to an entity covered under Regulation 17.1(iii) of these regulations, with an agreement duly signed between the Applicant and the said entity for sharing the terminal bay, switchyard, and dedicated transmission lines, as the case may be. The applicable Connectivity Bank Guarantee as per Regulation 8 of these regulations shall be submitted by such Applicant:*

.....”

As per the above, an applicant, covered under clause (e) of Regulation 4.1, which is a REGS or standalone ESS, may apply for the grant of Connectivity at the switchyard of a generating station having Connectivity to ISTS.

39. We have considered the submissions of NTPC. We note that CTUIL has been granting Connectivity to expansion projects at the existing switchyard; however, it has now raised issues with granting the same due to the insertion of a reference to Regulation 4.1(e) in Regulation 5.6. under the Third Amendment. The purpose of inserting a reference to Regulation 4.1 (e) in Regulation 5.6 was not to exclude certain categories but to bring more clarity to the submission of Conn-BG2 under Regulation 8.2 by multiple entities at the same terminal bay. The same is proposed for deletion under Regulation 5.6. Accordingly, it has been proposed to delete the words “[application under Regulation 4.1 (e)]” from Regulation 5.6 of the GNA Regulations.

Amendment to clause (xi)(a) of Regulation 5.8

40. NSEFI vide letter dated 05.02.2026 has raised the following issue regarding applying connectivity on LoA/PPA route at multi-locations as mentioned under such LoA/PPA:

“While the regulations acknowledge multi-located REGS projects. Regulation 5.8(xi)(a)(ii) presently restricts connectivity based on LOA/PPA to only one location.

Industry Issue:

Where a single LOA or PPA issued by an REI A explicitly provides for capacity deployment at multiple locations. the applicant should be allowed to seek connectivity at each of these locations directly based on the same LOA/PPA. without being compelled to adopt a land/land-BG route for the remaining locations.

.....

Misalignment of SCOD and Financial Closure Milestones

Under the current framework:

- *Connectivity for part capacity may be granted on an LOA/PPA basis, and*
- *Remaining capacity may be granted on a land/land-BG basis.*

Practical Concern:

This results in different SCOD and Financial Closure timelines (as per Regulation 11A) for different portions of the same PPA-backed project, even though:

- *All locations are obligated to supply power under the same PPA. and*
- *SCOD is contractually defined by the REIA.*

Such differential milestones create avoidable compliance challenges and operational complexity for developers, without any commensurate system benefit.

.....

In view of the above, we respectfully request the Hon’ble Commission to consider the following submissions:

1. Eligibility at All Locations:

For multi-located REGS projects covered under a single LOA/PPA issued by an REIA, connectivity should be permitted at all project locations directly on an LOA/PPA basis, to the extent of capacities specified in the LOA/PPA.

.....”

As per the above, NSEFI has requested permission to seek Connectivity at all the project locations mentioned under a single LoA/PPA issued by REIA for a multi- located REGS project.

41. Further, MNRE, vide its OM dated 31.03.2026, has forwarded an Agenda Note for discussion with CERC on 02.04.2026. One of the items therein discussed during the meeting on 02.04.2026, was the grant of Connectivity based on a single LoA/PPA at multiple locations as covered under such LoA/PPA. The relevant extract of this Agenda Note is as below:

“Agenda Item B3: Multi-Location RE Projects under Single PPA — Connectivity Restriction to a Single Location:

.....

Issue Detail

Regulation 5.8(xi)(a)(ii) restricts LOA/PPA-route connectivity to a single location. However, REIA tenders (SECI/NTPC) explicitly allow developers to set up projects across multiple locations under a single LOA/PPA.

Due to this restriction, developers are forced into a split approach: one location on the LOA/PPA route; remaining locations on the Land/Land-BG route. This results in misaligned

SCODs, separate financial closure requirements, and different connectivity grant and operational timelines for parts of the same project — all governed by a single PPA/PSA.

.....

Effects if Unresolved

Project delays, misaligned timelines, increased compliance burden, higher execution risk, and discouragement of geographically optimised RE deployment under single PPAs

.....

Solutions / Request from CERC

1) Allow LOA/PPA-based connectivity for ALL locations under a single REGS tied to the same LOA/PPA capacity — removing the single location restriction under Regulation 5.8(xi)(a)(ii).

2) Align SCOD, financial closure timelines, and connectivity start dates uniformly across all locations under the same PPA/PSA.

.....”

As per the above, MNRE requested that LOA/PPA-based connectivity be allowed at all the locations as mentioned under a single LOA/PPA for a multi-located REGS project.

42. The provision under clause (ii) and clause (iii) of the proviso to clause (xi)(a) of Regulation 5.8, as inserted vide the third amendment, provides as under:

“(ii) In case of the Applicant being multi-located REGS, where single LOA or PPA provides establishment of projects at multiple locations, the applicant shall be eligible to obtain the Connectivity based on such LoA or PPA, at any one location, upto the quantum for which LoA has been awarded or PPA has been executed or Installed capacity provided in the LOA or PPA at such location, whichever is lower. For balance capacity, if any, at this location and for capacity at other locations provided in the LOA or PPA, the applicant shall be eligible to seek the additional Connectivity under Regulation 5.8(xi)(b) or Regulation 5.8(xi)(c) of these regulations.

(iii) For an Applicant covered under sub-clauses (i) and (ii) of this clause, where LOA or PPA quantum is less than Installed capacity mentioned in the LoA at the location at which Connectivity has been sought based on such LoA and the entity wishes to seek Connectivity for a quantum more than LOA or PPA quantum at such location, it may apply through a single application with LOA or PPA for part quantum and with documents based on clause (b) or clause (c) of Regulation 5.8(xi) of these regulations for the balance quantum of Connectivity for such location. The Nodal Agency shall process the grant of such Connectivity treating the full quantum of Connectivity sought as a single project where SCOD for such project shall be considered based on LOA or PPA at such location. The compliance of the land documents under Regulation 11A shall be met for the quantum of Connectivity covered under clause (b) or (c) of Regulation 5.8(xi). The compliance of Financial Closure under Regulation 11A shall be met for the full quantum of Connectivity considering SCOD based on LOA or PPA. The SCOD for such a case, for the purpose of Regulation 24.6(1)(a) shall be that of LOA or PPA.

As per the above, in case of the Applicant being a multi-located REGS, where a single LOA or PPA provides establishment of projects at multiple locations, the applicant can seek Connectivity based on such LoA or PPA at one location only, and for the other locations, Connectivity can be applied based on Land or Land BG. The limit of eligibility

of Connectivity quantum using the LoA at one location was inserted based on comments received from the stakeholders that permitting same LoA to be used for seeking Connectivity at multi locations leads to a situation where total connectivity is granted more than LOA quantum e.g., If LoA is for 500 MW and an entity proposes solar project in Rajasthan for 500 MW and Wind project for 500 MW in Tamil Nadu and such entity would take total 1000 MW connectivity against the LoA of 500 MW. In this example of the same project, which is co-located, only 500 MW of Connectivity shall be considered against the installed capacity of 1000 MW (500 MW solar and 500 MW wind), thereby resulting in disproportionate treatment for collocated vs multi-located projects.

43. Subsequent to the issue of the third amendment, stakeholders have pointed out that where only part LoA quantum is utilised for seeking connectivity at one location, the balance quantum of LoA should be permitted for obtaining Connectivity at another location. For example, Juniper vide letter dated 10.9.2025 sought clarification stating the example as under:

“It is respectfully submitted that, for instance, LOA capacity is for 1000 MW and the capacity break up is mentioned as below:

a. REGS {Solar} – 500 MW at Location-A

*b. REGS (Solar) 300 MW at location-B. and
REGS (Wind)– 200 MW at location-C”*

In the above, if LoA is used to seek Connectivity at location A for 500 MW, the balance LoA of 500 MW cannot be utilized at Location B or location C, despite having a balance LoA quantum.

44. We have perused the sample data of hybrid LoAs with multi-located projects as under:

Sl. No.	Awarded Capacity (MW)			
	Project Capacity (MW)	Solar (MW)- Location ‘A’	Wind (MW)- Location ‘B’	ESS (MW) – Location ‘A’ or ‘B’
1	100	200	185	320
2	300	275	99	
3	88	110	162	
4	300	300	100	
5	150	200	100	154
6	100	150	190	90

45. As per the above, it is noted that in most of the LoAs, there would be no LoA quantum balance after seeking Connectivity at a particular location using such LoA. However,

keeping in view the examples as cited in Juniper letter dated 10.9.25 and representations of MNRE and NSEFI requesting to consider Connectivity for at least the LoA quantum even if at multi-locations, such that time to achieve milestones can be aligned with LoA/PPA, we have proposed to allow Connectivity at multi -locations using the same LoA maximum up to LoA quantum subject to certain conditions as under:

- (i) Connectivity at multiple locations based on a single LoA or PPA may lead to a situation where an entity may seek Connectivity at different locations utilizing only a portion of the LoA quantum and balance on Land or Land BG so as to obtain the extendable timeline to achieve COD. For example, in the table in Para 44 above, S. No. 1 seeks connectivity at location 'A' using 50 MW LoA and 150 MW Land BG, and at Location 'B' uses 50 MW LoA and 135 MW Land BG. Such an entity, if it wishes to take Connectivity of 100 MW or more at Location 'A' using LoA of 100 MW, the full LoA quantum shall be utilised at Location 'A' itself.

46. It is also noted that if an entity implements multiple projects at different locations under the same LoA, they may be part of the same project under the FDRE tender, but they are separate generating stations under the Act. To ensure that these generating stations are constructed in a timely manner and avoid stranding of transmission, extension of SCOD at one location should not automatically extend the SCOD of the 2nd location where there are no force majeure conditions. Hence, it is clarified that SCOD, based on the LoA or PPA for the purpose of Regulation 11A and Regulation 24.6, will only be applicable at the location at which Connectivity has been granted on the LoA/PPA route. For the capacity at a location where the full connectivity has been granted under clauses (xi)(b) or (xi)(c) of Regulation 5.8, the entity will be liable to meet the milestones within the timeline applicable for such routes.

47. The provisions discussed above are also explained under the following illustration:

Illustration: An entity got an LOA for 1000 MW contracted capacity with the following configuration:

Location Number	Installed Capacity and source	Location	Eligibility	Remarks
1.	600 MW Solar	Rajasthan	600 MW connectivity can be taken at location no. 1 using	The entity shall not be eligible to seek Connectivity for <600 MW using an LOA in case it wishes to seek connectivity for a total of 600 MW at this location using land or land BG for part quantum.

			LOA	SCOD for such a generating station shall be considered based on LOA or PPA at such location for the purpose of Regulation 11A and Regulation 24.6.
2	500 MW Wind	AP	400 MW connectivity can be taken using LOA, and for 100 MW, land or Land BG to be furnished	Entity shall not be eligible to seek Connectivity for <400 MW (LOA quantum – connectivity sought at Location No.1) using LOA in case it wishes to seek connectivity for a total of 400 MW or above at this location using land or land BG for part quantum SCOD for such a generating station shall be considered based on LOA or PPA at such location for the purpose of Regulation 11A and Regulation 24.6.
3.	200 MW Solar	Telangana	Land or Land BG	The entity shall be required to meet the milestones for such generating station within the timeline applicable for the connectivity granted on the Land or Land BG route.

48. Considering the above, necessary amendments have been proposed under clauses (ii) and (iii) of the proviso to clause (xi)(a) of Regulation 5.8 of the GNA Regulations.

Amendment to clause (xii) of Regulation 5.8

49. Clause (xii) of Regulation 5.8 provides as under:

“(xii) In case of Applicants which are REGS (other than Hydro generating station or ESS (excluding Pumped Storage Plant (PSP)) the following documents shall be submitted:

(a) The details of promoters and their shareholding pattern in the Company.

b) Tentative Generation and drawal profile for the capacity for which Connectivity has been sought.

As per the above, the applicants which are REGS are required to furnish (i) the details of promoters and their shareholding pattern in the Company, and (ii) the tentative generation and drawal profile for the capacity for which Connectivity has been sought.

50. Further, Regulation 11A(6) restricting the change in control is also applicable to the Renewable Power Park Developer (RPPD). Accordingly, the same which was inadvertently omitted under the above-quoted clause is proposed to be included.

Amendment to sub-clause (c) of clause (xi) of Regulation 5.8

51. Sub-clause (c) of clause (xi) Regulation 5.8 provides as under:

“(xi) In case of Applicants which are REGS (other than Hydro generating station or ESS (excluding Pumped Storage Plant (PSP)) the documents shall be submitted as per sub-clause(a) or sub-clause (b) or sub-clause (c) as specified hereunder:

.....

(c) For a capacity up to 1000 MW - Bank Guarantee of Rs. 10 lakh/ MW and for a capacity more than 1000 MW - Bank Guarantee of Rs. 100 Crore plus Rs. 5 lakh/MW for capacity over and above 1000 MW, in lieu of ownership or lease rights or land use rights of land for 50% of the land required for the capacity for which Connectivity is sought subject to provisions of Regulations 11A and 11B of these regulations.”

As per the above, the requirement of LAND BG has been specified for an applicant, including ESS (other than PSP). We note that in the case of ESS (excluding PSP), the requirement of land as noted in the “Detailed Procedure for grant of Connectivity and GNA” issued by CTUIL on 10.042026 is as under:

“VIII. Minimum land requirement for different type of RE projects: Applicant shall submit the land documents considering the per MW land area requirement as per following: -

- Solar: The minimum land requirement for solar standalone projects/power parks shall be 3 Acres/MW.*
- Wind: The minimum land requirement for wind standalone project/ power parks shall be 0.25 Acre/MW. However, for wind projects, land parcels shall be suitable for development of Wind power project and contiguous land shall not be accepted. To substantiate the same, applicants shall provide capacity of the individual turbines considered for the project for calculation of the land requirement and placement of wind turbine generators (WTGs) on the land parcels indicating the inter-WTG distance in accordance with MNRE Guidelines. Applicant shall also submit the plotting of each WTG indicating the land parcel being utilized for the same. Further, applicant shall submit land parcels for minimum half the number of WTGs required for the project.*
- BESS : The minimum land requirement for BESS projects shall be 0.03 Acres/MWh.**
- Hybrid: The benchmark levels for Hybrid projects or with storage project shall be calculated as arithmetic sum of land requirement for each RE/ESS type.”*

As per the above, the land required for the BESS is comparatively less.

52. We are of the view that since the Land BG is being submitted in lieu of furnishing the land documents at the time of Connectivity application, and in case of BESS, the land requirement is much less, therefore, the required amount of Land BG for the ESS (excluding the PSP) may be reduced to facilitate integration of ESS.
53. Accordingly, it is proposed to reduce the amount of Land BG to Rs. 5 lakh/MW in case of Connectivity applied for ESS (excluding PSP).

Amendment to Regulation 9.3

54. Juniper vide letter dated 08.05.2026 has raised the following issue:

Explanatory Memorandum of Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2026

“2. Amendment in Regulation 9.3.5 - Change in Energy Source:

The restriction limiting change in renewable energy source(s) only once may kindly be revised to permit such changes up to two or three occasions, particularly where such changes are necessitated due to REIA bidding flexibility, hybrid project optimization, BESS integration or project implementation constraints.

3. Amendment in the deadline for change in energy source:

a. The current regulation stipulates that the deadline for change in the energy source within 18 months from the date of in-principle grant of connectivity, or 18 months prior to the firm start date of connectivity; whichever is earlier.

However, it is observed that the transmission system required for operationalization of connectivity is often delayed by approximately 1.5 to 2.5 years beyond its SCOD. In such cases, the existing provision—particularly the deadline linked to the firm start date of connectivity—does not serve its intended purpose in a practical manner.

b. In view of the above, it is proposed that the timeline for permitting a change in energy source be revised. Specifically, such change should be allowed up to 6 months prior to the Effective Date of Connectivity.

c. This proposed timeline is also aligned with the provisions under the REIA Power Purchase Agreements (PPAs), wherein the deadline for finalizing the energy source is typically set at 6 months prior to the SCOD, which is in turn linked to the Effective Date of Connectivity.

Accordingly, it is requested that the regulation be amended to permit change in energy source up to 6 months prior to the Effective Date of Connectivity, ensuring consistency with PPA provisions and addressing practical implementation challenges.”

As per the above, Juniper highlighted that under the REIA’s PPA, the deadline for finalising the energy source is typically set at 6 months prior to the SCOD. Accordingly, Juniper has requested to make a change of source up to two or three times and up to 6 months prior to the Effective Date of Connectivity.

55. We observe that a generating station should submit an application for connectivity after a preliminary assessment of the source. However, as pointed out in the above-quoted letter, there may be cases requiring a change of source due to the flexibility requirements of generating stations. Considering the requests, it is proposed that a change of source may be allowed up to two times, and the source change shall be permitted up to 6 months prior to the firm start date of Connectivity. However, to ensure that the source is applied for in the initial application with due deliberation and thought, the second change would attract a fee of Rs. 50000/MW.
56. Accordingly, the necessary modification has been proposed under sub-regulation 9.3.1 and 9.3.5 of Regulation 9.3 of the GNA Regulations.

Amendment to clause (1) of Regulation 11A

57. Regulation 11A(1) as amended vide third amendment provides as under :

“(1) *An applicant which is REGS (other than Hydro generating station) or ESS*

(excluding PSP) covered under sub-clause (c) of Clause (xi) of Regulation 5.8 or Renewable power park developer covered under sub-clause (c) of Clause (vii) of Regulation 5.8 shall submit documents for land in terms of sub-clause (b) of Clause (xi) or sub-clause (b) of Clause (vii) of Regulation 5.8 of these regulations, as the case may be, within 18 months of issuance of an in-principle grant of Connectivity or within 12 months of issuance of a final grant of Connectivity, whichever is earlier. The Bank Guarantee submitted under subclause (c) of Clause (vii) or under sub-clause (c) of Clause (xi) of Regulation 5.8 of these regulations shall be returned within 7 days of acceptance of the submitted land documents by the Nodal Agency,

Provided that, in case final grant of Connectivity has been intimated at an ISTS substation where neither the final coordinates nor the tentative coordinates are communicated along with final grant of Connectivity by the Nodal Agency, the applicant shall furnish the required land documents by the later date of subclause (a) or (b) specified below:

(a) within 18 months of issuance of an in-principle grant of Connectivity or within 12 months of issuance of a final grant of Connectivity, whichever is earlier, or

(b) within nine months from the date of communication of tentative coordinate of the substation at which Connectivity has been granted in terms of clause (b) of Regulation 10.5 of these regulations”

As per the above, the Proviso was inserted vide the third amendment, based on stakeholders' comments, to provide 9 months from the Nodal Agency's communication of coordinates to furnish land documents. As per above, the entity to whom the final grant of Connectivity has been issued, but whose coordinates have not been communicated, was eligible. Under the third amendment transition clause, Regulation 37.10, the Nodal Agency was required to issue a final grant of Connectivity to all entities within 15 days of the effectiveness of the third amendment, where all Conn-Gs were furnished. However, the Nodal agency brought to the Commission's notice in petition No. 666/MP/2025 that it was not able to issue the final grant to entities since it is not able to plan the system (for ~60 GW). For such entities, including entities under 666/MP/2025, the last date to furnish land documents was based on the in-principle grant and despite no communication of coordinates, the entity was required to furnish land documents.

58. To address the issue of immediate attention and to deal uniformly with similarly placed entities, the Commission vide order dated 08.12.2025 in Petition No. 14/SM/2025 directed as under:

“47. We note that Regulation 11A(1) as amended under the Third Amendment provides as under:

.....

48. As per above, for the cases where tentative or final coordinate have not been communicated, at least 9 months are permitted to furnish land documents from date of such communication of tentative coordinates. CTU has informed that the above shall be applicable only for cases where final grant of Connectivity has been issued. However, for cases where

final grant is not issued by CTU due to various reasons, the timeline of 18 months from in-principle grant shall be the governing timeline.

49. We are of the view that in case final grant of Connectivity is delayed by CTU, and no coordinate is furnished by CTU to such entity, such an entity should be permitted at least 9 months from the communication of tentative coordinate to furnish land documents. CTUIL is directed to permit the timeline for land documents accordingly.”

As per the above, the Proviso was made applicable to an entity that has been issued an in-principle grant of connectivity only and not the final grant of connectivity.

59. The directions issued under the above-said 14/SM/2025 are incorporated in the draft amendment by inserting the words “in-principle grant’ before the words ‘final grant’ in the proviso to Regulation 11A.

Submission of land documents by entities under the LoA/PPA route

60. It is observed that a number of entities have obtained Connectivity using the LoA route as early as 2019. However, many of these LoAs did not result into PPAs. The issue is under consideration in the Suo Motu case 11/SM/2026. However, such entities were not required to furnish land documents, which created a non-level playing field in comparison to entities with fixed timelines to furnish land documents, that too when such LoA-based projects could not be commissioned, since PPAs were not signed. We are of the view that once the Connectivity is granted, which is a scarce resource, there must be sufficient steps towards project implementation, and land is the primary requirement for project implementation. To address the above issue and to ensure the seriousness towards utilization of connectivity and to ensure the connectivity grantee to take adequate steps towards project implementation, it is proposed that the entity covered under sub-clause (a) of clause(xi) of the Regulation 5.8 should also furnish the land documents in terms of sub-clause (b) of clause (xi) of Regulation 5.8, 15 days after date of effectiveness of the GNA.
61. Accordingly, a new proviso (second proviso) to clause (1) of Regulation 11A has been proposed to be added.

Amendment to clause (2) of Regulation 11A

62. Avaada, vide its letter dated 06.02.2026, has raised the following concerns:

“

No time extension in FC timeline, even if TSP’s commissioning timeline is delayed Further, it is observed that delays in commissioning of the associated transmission systems by the Transmission Service Providers (TSPs) are not being reflected through issuance of revised GNA effectiveness dates or revised final grants. As a

result, developers are subjected to FC compliance timelines that are misaligned with actual transmission system readiness, exposing them to unintended non-compliance and potential regulatory consequences for factors beyond their control.”

As per the above, Avaada has highlighted the issue of achieving Financial Closure based on the firm start date of connectivity, even if the transmission system is delayed, leading to a delayed GNA effective date. Stakeholders have sought alignment on submitting Financial Closure 6 months prior to the likely effective date of GNA based on the anticipated COD of augmentation.

63. We have perused clause (2) of Regulation 11A, which provides as under:

“(2) An applicant which is REGS (other than Hydro generating station), ESS (excluding PSP) or Renewable power park developer to which an in-principle grant of connectivity has been issued, shall have to achieve the financial closure for the capacity of such Connectivity, latest by 6 months prior to the scheduled date of a commercial operation or firm start date of Connectivity of such applicant, whichever is later:

Provided that such an applicant shall submit proof of Financial Closure of the project (with copy of loan sanction letter or proof of first disbursement of loan amount) or copy of board resolution (if internal funding is planned for 100% of the project cost) to CTU within 15 days of achieving the financial closure:

Provided further that in case of REGS (other than Hydro generating station) or ESS (excluding PSP) which has been granted Connectivity under sub-clause (a) of Clause (xi) of Regulation 5.8, the scheduled date of commercial operation for the purpose of this Clause shall be considered as the SCOD, as extended by REIA or a distribution licensee or an authorized agency on behalf of distribution licensee from time to time, subject to the condition that any extension in the timeline to achieve the milestone of Financial Closure due to extension in SCOD shall not be allowed more than 12 months from the original timeline as per initial SCOD:

Provided also that entities which have been granted Connectivity under sub-clause (b) or (c) of Clause (xi) of Regulation 5.8 and are subsequently covered under sub-clause (a) of Clause (xi) of Regulation 5.8 shall be required to achieve financial closure for the capacity of such Connectivity, latest by 6 months prior to the firm start date of Connectivity of such applicant.”

As per the above, the entity shall have to achieve financial closure (FC) latest by 6 months prior to the SCOD or firm start date of Connectivity, whichever is later, and submit the FC documents within 15 days of achieving FC.

64. We note that CTUIL convenes a JCC meeting on a quarterly basis to assess the status of the implementation of the transmission system as well as the generation project. Based on JCC, we analysed data of the likely date of COD for a transmission line as under:

Khetri -Narela 765 kV Transmission Line, SCOD as per TSA - 10.11.2023				
Sl. No.	JCC Meeting	Meeting held on	MoM issued on	Status/Expected commissioning date
1	Project Review meeting for Transmission	31.03.2023	04.05.2023	Nov, 2023
2	Project Review meeting for Transmission	05.07.2023	25.07.2023	March, 2024

3	27th JCC	27/28. 09.2023	03.11.2023	March, 2024
4	28th JCC	05.01.2024	26.02.2024	31.03.2024
5	29th JCC	27.03.2024	16.05.2024	30.06.2024
6	30th JCC	26.06.2024	10.08.2024	31.12.2024
7	31st JCC	30.09.2024	17.11.2024	31.03.2025
8	32nd JCC	24.12.2024	06.03.2025	31.03.2025
9	33rd JCC	26.03.2025	15.05.2025	31.05.2025
10	34th JCC	25.06.2025	01.09.2025	30.09.2025
11	35th JCC	24.09.2025	19.11.2025	30.11.2025
12	36th JCC	29/30. 12.2025	05.02.2025	05.12.2025 (DOCO)

As per above, the likely date of COD was changed multiple times, and it was changed very close to the final likely date. For example, when the likely date was 31.3.2024, it was modified to June 2024 during a meeting on 27.3.2024. Hence, any milestone on the likely date lacks timely monitoring and may lead to disputes till the same is actually achieved. It is also noted from the above data that there is a gap between the firm start date (on the basis of the SCOD), which in the instant case is 30.11.23, and the actual COD on 5.12.25.

65. Accordingly, the timeline to furnish the FC documents is proposed to be linked to GNA effectiveness, i.e., within the 15 days of the effectiveness of the GNA. It is also noted that there are two timeline requirements for FC documents: one to achieve FC, and a second timeline to furnish the FC documents. It is proposed that only a single timeline of furnishing the FC documents would suffice in place of two timelines, one to achieve FC, and a second timeline to furnish the FC documents.
66. Further, clause (2) of Regulation 11A also provides the timeline to achieve the FC linked with SCOD or extended SCOD in case of an entity covered under sub-clause (a) of clause (xi) of Regulation 5.8. There may be cases where extended SCOD is beyond the GNA effective date, and once GNA becomes effective, it implies that the transmission system is standing idle since that generating station could not achieve its COD. Hence, to show the commitment towards the project, at least FC should be furnished once GNA is effective by all entities, including entities that have connectivity based on LoA/PPA. Accordingly, clause (2) of Regulation 11A has been proposed to be amended as under:

“(2)An applicant which is REGS (other than Hydro generating station), ESS (excluding PSP) or Renewable power park developer shall furnish the financial closure documents (copy of loan sanction letter or proof of first disbursement of loan amount or copy of Board resolution, if internal funding is planned for 100% of the project cost, along with networth and other details as per Detailed Procedure) for

the capacity of such Connectivity, within 15 days of effective date of GNA.”

Amendment to clauses (4) and (5) of Regulation 11A

67. ACME vide its letter dated 27.03.2026 has submitted as under:

“Regulation 11A(4) permits conversion of connectivity route from Bank Guarantee (BG) / Land-based connectivity to LOA route only where the connectivity grantee itself holds a valid LOA/PPA.

However, in cases where:

- the LOA/PPA is held by a subsidiary of the connectivity grantee,*
- or*
- the LOA/PPA is held by a parent of the connectivity grantee, or*
- the LOA/PPA is held by another subsidiary having the common parent company,*

the entity holding the LOA/PPA is not the connectivity grantee and is either subsidiary or parent or sister company having common parent of the connectivity grantee. As per current reg 11(a)(4), it is not permitted to exercise route conversion from land or land BG to LOA/PPA.

As a result, subsidiaries or group entities—even with valid LOA/PPA— are unable to convert the route, despite being part of the same corporate structure.

This restriction is inconsistent with Regulation 15(1) of the GNA Regulations, which explicitly allows that:

“connectivity granted to an entity may be utilised by its parent company, its subsidiary, or any other subsidiary having the same parent company.”

While Regulation 15(1) recognizes group-level flexibility in utilisation of connectivity, Regulation 11A(4) restricts route conversion only to the original connectivity grantee, thereby defeating the intent of group- level project execution flexibility.

Accordingly, it is requested that 11(A)(4) be amended as follows:

An entity, which has applied for Connectivity under clause (xi)(b) or clause (xi)(c) of Regulation 5.8 and has been issued final grant of Connectivity, is issued LOA or enters into a PPA either through itself or its subsidiary company or its parent company or other subsidiaries having the same parent, as eligible under clause (xi)(a) of Regulation 5.8, either for part capacity or full capacity, may apply to the Nodal Agency for conversion of its Connectivity under clause (xi)(b) or clause (xi)(c) of Regulation 5.8 to clause (xi)(a) of Regulation 5.8, subject to the following....

The above would harmonises Regulation 11A(4) with Regulation 15(1) and aligns route conversion rights with Connectivity utilisation rights already recognised under the Regulation.

As per the above, ACME is requesting to allow the conversion of the Connectivity from the Land or Land BG route to the LoA/PPA route based on the LoA/PPA issued to either subsidiary, parent or sister company having a common parent of the connectivity grantee.

68. In this regard, we have perused the Regulation provisions under Regulation 11A of the GNA Regulations. Clause (4) of Regulation 11A provides as under:

“(4) An entity, which has applied for Connectivity under clause (xi)(b) or clause (xi)(c) of Regulation 5.8 and has been issued final grant of Connectivity, is issued LOA or enters into a PPA, as eligible under clause (xi)(a) of Regulation 5.8, either for part capacity or full capacity, may apply to the Nodal Agency for conversion of its Connectivity under clause (xi)(b) or clause (xi)(c) of Regulation 5.8 to clause (xi)(a) of Regulation 5.8, subject to the following:

.....”

As per the above, an entity covered under clauses (xi)(b) or (xi)(c) of Regulation 5.8 and has been issued a final grant of connectivity, after issuance of LoA or entering into a PPA, may seek conversion of its connectivity under clause (xi)(a) of Regulation 5.8. However, this provision does not provide for such conversion based on the LoA issued to or PPA entered into by the parent company or subsidiary company or subsidiary company of the same Parent company of the entity that has been issued the final grant of connectivity.

69. We also perused clause (5) of Regulation 11A, which provides as under:

“(5) The conditions subsequent to the grant of Connectivity required to be completed under Regulation 11A and achieving COD shall be met as under:

(a) Where Connectivity has been granted to a Parent Company and the Project is being executed by the subsidiary company(ies), the conditions subsequent to the grant of Connectivity required to be completed under Regulation 11A and achieving COD may be met by the subsidiary Company(ies) executing the project.

(b) Where Connectivity has been granted to the subsidiary company, and the Project is being executed by other subsidiary company(ies) of the same Parent company, the conditions subsequent to the grant of Connectivity required to be completed under Regulation 11A and achieving COD may be met by the subsidiary company(ies) executing the project.

(c) Where Connectivity has been granted to the subsidiary company, and the Project is being executed by the Parent company, the conditions subsequent to the grant of Connectivity required to be completed under Regulation 11A and achieving COD may be met by the Parent Company executing the project.”

As per the above, the condition subsequent to grant of Connectivity, as required under Regulation 11A, may be met by the subsidiary company (executing the project) of the Parent company which has been granted connectivity or vice versa, or by the subsidiary company (executing the project) of the same Parent company of the subsidiary that has been granted the connectivity.

70. The issue raised by ACME has recently been decided in the Order dated 27.3.2026 in IA. No. 17/2026 in Petition No. 75/MP/2026, where conversion from the Land BG route to LoA route was denied, where LoA was issued to an entity other than the entity that was a grantee, as per the extant Regulations. However, considering the issues raised in the said Petition, that there are situations where a subsidiary may enter into a PPA, the same is proposed to be inserted in Regulation 11A(4).

71. However, we note that entities obtain the Connectivity on the Land or Land BG route and later seek conversion to the LoA route so that they do not need to furnish Land documents. We have also noted a change in the location of projects that have been obtained as late as 1.5-2 years after issuance of LoA, so that these LoAs becomes eligible to be utilized for connectivity under Land BG. An entity that has made an application under LAND BG should be prepared to furnish land documents, as per the regulations, when the entity made such an application. We have also noted in 11/SM/2026 that a number of LoAs actually did not convert into PPA. Such an entity securing connectivity first on Land BG with an underlying assurance that it will furnish land documents, later converts to the LoA route, does not furnish the land documents and keeps the Connectivity without any milestone, PPA or certainty to develop the project.
72. In light of these discussions, it is proposed that conversion of connectivity from clauses (xi)(b) or (xi)(c) to clause (xi)(a) of Regulation 5.8 should only be allowed based on the PPA and not on the basis of LoA.
73. Considering the above, the amendment has been proposed under clause (4) and sub-clause (d) of clause (5) of Regulation 11A, where an entity may seek conversion from clauses (xi)(b) or (xi)(c) to clause (xi)(a) of Regulation 5.8 on the basis of PPA, where the PPA may have been entered into by the entity which has been issued final grant of Connectivity or by its Parent company or vice versa, or the subsidiary of the same parent company of the entity who has been issued final grant of connectivity.

Amendment to clause (6) of Regulation 11A

74. Regulation 10.1 and clause (6) of Regulation 11A provide as under:

Regulation 10.1

“10.1 Within 30 days of the intimation of the final grant of Connectivity by the Nodal Agency under Regulation 9.1 of these regulations, a Connectivity Agreement (Cat-1) shall be signed between the Nodal Agency and the entity which has been intimated the final grant of Connectivity. Upon signing of the Connectivity Agreement, such entity shall become the Connectivity grantee.

Clause (6) of Regulation 11A

“(6) Control of the Connectivity Grantee which is REGS (excluding hydro generating station) or ESS (excluding PSP) or Renewable power park developer, for the period from the date of Connectivity application up to the COD of the project:

(a) In case the Connectivity Grantee is a single company, the promoters or shareholders, as applicable, of the Connectivity Grantee, shall retain control of such Connectivity Grantee.

(b) In case the Connectivity Grantee is a consortium, the consortium members collectively shall retain control of the Connectivity Grantee.

(c) Any deviation from the requirement of Control as specified under sub-clauses (a) and (b) of this clause, shall require prior approval of the Nodal Agency. The Nodal Agency shall publish, within 60 days of the date of effect of these amendments after public consultation, a detailed procedure specifying the modalities for such approval, including the timeline for approval and the indicative grounds on which the application for approval shall be considered.

.....”

As per the above, only the Connectivity grantee is covered under clause (6) of Regulation 11A for seeking prior approval of the Nodal Agency for allowing deviation in change in control. In terms of Regulation 10.1, an entity becomes a connectivity grantee only after signing the Connectivity agreement.

75. Thus, an entity which has been issued only an in-principle grant of connectivity is not eligible for seeking approval under clause (6) of Regulation 11. The provision under regulation 11A(6) was introduced in the third amendment, along with a transition clause under regulation 37.10, under which all entities were required to be issued the final grant of Connectivity within 15 days of the effectiveness of the third amendment, where all Conn-BGs were furnished. To the fresh in-principle grantees, the issue of final connectivity is envisaged within 15 days of BG submission, even when the firm start date of Connectivity is not available. The said provisions have been included in the third amendment at the request of the Nodal Agency, as noted in the Explanatory memorandum to the draft third amendment. However, the Nodal agency has brought to the Commission’s attention an issue in petition No. 666/MP/2025 that it was not able to issue the final grant to entities since it was not able to plan the system itself (for ~60 GW). For other cases also, such as in 1015/MP/2025, it was brought to the Commission’s notice that the Nodal Agency has not issued the final grant to entities even after submission of Conn-BGs and that there are no difficulties in planning for such entities.
76. The above discussion leads to the conclusion that there may be cases where only an in-principle grant has been issued, the Nodal agency has not issued a final grant as required under the third amendment, and such entities are required to undergo a change of control for conditions applicable under the Detailed Procedure issued by the Nodal Agency.
77. Accordingly, a suitable amendment has been proposed in clause (6) of Regulation 11A to cover the entity which has only been issued an in-principle grant of connectivity and the term “Connectivity grantee” has been replaced with the word “entity”.

78. When an entity that had furnished Land document or FC in its name subsequently underwent a change in control (after due approval of the Nodal Agency) it is proposed that Regulation 15 would become applicable to such entity which underwent a change in control. Accordingly, a new Regulation 15.4 has been proposed to be added under the GNA Regulations as under:

“15.4 The Regulations 15.1 to 15.3 shall be subject to the permitted change in control under clause (6) of Regulation 11A(6) of these regulations.”

Amendment to Regulation 16.2 and New Regulation 37.11

79. NSEFI vide its letter dated 11.11.2025 has requested to return the Conn-BG2 and Conn-BG3 within 60 days from the date of declaration of commercial operation of the project. The relevant extract of said letter is as under:

“Retaining Bank Guarantees (BGs) for a period of five years would significantly constrain developers' access to substantial financial resources. Consequently, developers would be compelled to deplete their existing bank limits in order to secure funding for future projects. Considering the aggressive bidding strategy outlined by the Central Government to meet the nation's climate targets, it is imperative that developers have unimpeded access to the necessary capital to advance the RE projects in the country. The unnecessary retention of BGs would, therefore, have severe implications for the timely commissioning of renewable energy (RE) projects. This delay could hinder the achievement of the country's climate goals. To avoid such detrimental outcomes, it is requested that the Bank Guarantees be returned within 60 days from the date of the declaration of commercial operation.”

80. MNRE, vide its OM dated 31.03.2026, has sent an Agenda Note for the meeting with CERC on 02.04.2026. One of the Agendas under the Note, which was discussed during the meeting on 02.04.2026, was about the return of the Conn-BGs, as extracted below:

“Issue No.2 - Disproportionately long post-COD BG retention:

.....

Retaining Conn-BG2 and Conn-BG3 for 5 years post-COD blocks developer credit limits, reduces liquidity, constrains investment in new projects, and creates unnecessary administrative burden for CTU — without serving any additional compliance or performance purpose.

.....

Solutions / Request from CERC

1) Amend GNA Regulations to allow full release of Conn-BG2 and Conn-BG3 within 6 months of COD (sufficient window to cover settlement of any liquidated damages) — replacing the current 5-year phased release.

.....”

As per the above, MNRE requested that CERC allow the full release of Conn-BG2 and Conn-BG3 within 6 months of the project's COD.

81. The return of Conn-BG2 and Conn-BG3 over five years under the extant GNA Regulations addressed the event of relinquishment by a generating station after COD with encashment of subsisting BGs.
82. Considering the suggestions of stakeholders, including MNRE, and that a generating station is unlikely to relinquish Connectivity after COD and that they establish their credentials on operating for one year after COD, it is proposed that Conn-BG2 and Conn-BG3 may be returned after one year of the COD of the project.
83. Accordingly, the suitable amendment has been proposed in Regulation 16.2 of the GNA Regulations.
84. Further, to cover the cases where the time period of one year after CoD of the project has elapsed as on effectiveness of the fourth amendment, a transition provision has been incorporated at Regulation 37.11, wherein it is proposed that Conn-BG2 and Conn-BG3 to such entity shall be returned within one month of effectiveness of the fourth amendment to the GNA Regulation, subject to clearing the dues of transmission charges, if any.

New Regulation 17.5 (Dual Connectivity to an entity covered under Regulation 17.1(iii))

85. The issues of allowing the dual connectivity to the Bulk Consumer, i.e., simultaneous connection with intra-State transmission system as well as with the ISTS for the same load were discussed under the Staff Paper published on 9.10.2024, and the stakeholders were requested to provide their comments/suggestions on the proposed discussion issue. The relevant extract of this Staff Paper is as under:

“4 Issue No. 3: Dual Connectivity to the Bulk Consumer for the same load capacity

4.1 CTUIL vide letter dated 24.01.2024 has submitted as under:

“1. Dual Connectivity for Bulk Consumers: In our earlier letter dated 12.07.23, it was pointed out that unlike generators, Dual Connectivity for Bulk Consumers i.e. connection to both ISTS and Intra-state systems is not provided in GNA Regulations. Dual Connectivity is provided to generators, however, not for the same capacity (i.e. part to ISTS and part to Intra-state). Representations have been received from various Bulk Consumers regarding the requirement of Dual Connectivity for same load capacity to both ISTS and Intra-state transmission system. One of the primary reasons for this requirement is to enable the Bulk Consumers to avail RTC green power, i.e. from ISTS during availability of RE power and banked power from intra-state entities such as DISCOMs through STU network during non/low RE hours.”

As per the above, CTUIL has received representations from various Bulk Consumers regarding the requirement of Dual Connectivity for the same load capacity to both ISTS and Intra-state transmission system to enable the Bulk Consumers to avail of RTC green power, i.e., from ISTS during the availability of RE power and banked power from intra-state entities such as DISCOMs through STU network during non/low RE hours.

.....

4.3 Thus, at present, GNA Regulations do not have any provision to grant GNA to bulk consumers through dual connectivity, i.e., the entity is connected with the intra-State network as well as ISTS for the same load capacity or for enhanced capacity.

4.4 The following issues need consideration:

- i. Such provision of dual connectivity may facilitate the bulk consumer to avail of RTC green power.
- ii. There may be a question of redundant capacity in the intra-State network and ISTS due to such dual connectivity for the same load capacity and on whom should such liability fall to pay the transmission charges for such stranded capacity.
- iii. There may be the possibility that such Bulk Consumers may seek GNARE from ISTS and avail of full ISTS transmission charges waiver; however, on the other side, they draw non-RE Power from the intra-State network. In such a situation, redundant capacity may be developed in the system for an entity that is not actually paying the transmission charges for such a transmission system.
- iv. The inter-se flows between ISTS and intra-State transmission network would need coordinated planning between CTU and STU.

4.5 Considering the above, Comments and suggestions are sought from stakeholders on the following issues:

- i. Whether such grant of GNA to Bulk Consumer through dual connectivity, i.e., for the same load capacity should be allowed or not?
- ii. If such a grant of GNA to Bulk Consumer through dual connectivity is allowed, can it be coupled with the following conditions:
 - a. NOC of the STU based on the commitment of bulk consumers to pay the applicable charges of the intra-State network if the applicant is already connected with the intra-State network and seeking GNA through direct connectivity with ISTS?
 - b. Commitment of bulk consumer to pay the applicable charges of ISTS if the applicant is already connected with the ISTS and seeking connectivity to the intra-State network.
 - c. Should only those Bulk Consumers be granted GNARE from ISTS, which is drawing only RE power through the intra-State network also. Further, after the granting of GNARE, if the user starts drawing non-RE power through the intra-State network, its GNARE may be converted into GNA with a waiver of the ISTS charges as applicable for GNA in terms of the Sharing Regulations, 2020.”

86. The following are the key comments/suggestions provided by the stakeholders on the issue:

Comments of the generating entity

- (i) Connectivity to both intra and inter- state networks for the same load capacity should be allowed with NOC from the STU and upon payment of applicable transmission charges for the contracted capacity reserved in each respective network.
- (ii) Some stakeholders suggested that both the GNA and GNARE options should be allowed.
- (iii) It will result in the blocking of double open access quantum, which is against the

principle of optimizing existing transmission infrastructure. Unless effectively coordinated, and monitored redundant network investments could lead to stranded assets

- (iv) Bi-directional Power Flow: Fluctuations in real-time load may lead to critical overload interconnection points between ISTS and intra-state networks
- (v) Any ambiguities in scheduling, metering, and energy accounting responsibilities amongst ISTS and STU constituents may cause inefficiencies.

Comments of Bulk Consumer

- (vi) Dual connectivity to the Bulk Consumer for the same load capacity may be allowed. Further, both GNA and GNA_{RE} should be allowed as options.

Comments of DISCOMs

- (vii) Dual connectivity for bulk consumers may be allowed subject to conditions of submission of NOC from the STU and committing to pay all the applicable Transmission charges for both the intra-state as well as ISTS network.
- (viii) Such provision has the potential of entities indulging in gaming of the system, as entities may enjoy full transmission charge waiver if they have obtained GNA_{RE} from ISTS and they are drawing non-RE power from the InSTS system. Measures to prevent any misuse of this flexibility are also required to be kept.
- (ix) Only bulk consumers committed to drawing renewable energy through both networks should be eligible for waivers under GNA_{RE}. If non-RE power is drawn through the intra-State network, the GNA_{RE} should convert to GNA.
- (x) Power drawn from the CTU system may flow through the STU system and vice-versa. Hence, appropriate metering arrangements should be made along with an appropriate energy accounting and deviation settlement mechanism.
- (xi) The redundancy in Capacity due to dual Connectivity could increase transmission charges for DISCOMs and other consumers connected to these networks. To mitigate this, consumers should be made liable for the fixed transmission charges of both networks, as applicable, regardless of whether they are fully utilizing the capacity in each system.
- (xii) Demonstration of optimal utilization of both networks is mandatory to justify dual connectivity. In the event of transmission corridor constraints, priority must be given to STUs and DISCOMS.

- (xiii) Consumers should be allowed to exercise their rights as provided under the Act, in its true spirit, and give them the freedom to choose both connectivity options that ensure reliable and efficient power supply. From a business perspective, restricting bulk consumers to the Inter-State Transmission System (ISTS) only could cause intra-state transmission licensees to lose business opportunities. On the other hand, if most consumers opt for the ISTS network, intra-state transmission licensees may face challenges. Hence, the Commission should allow consumers to choose their connection. From an operational standpoint, the Load Dispatch Centre (LDC) 's jurisdiction over control areas must be clearly defined for consumers, as is the case for generators, in accordance with Regulation 43 of the IEGC-2023.
- (xiv) Some entities have expressed the view that dual connectivity should not be allowed.

Comments of Grid India

- (xv) Dual connectivity to any Bulk Consumer or DISCOM should not be allowed to ensure jurisdictional sanctity & operational control of respective Load Despatch Centre (be it SLDC or RLDC). However, for DISCOMS, such dual connectivity becomes inevitable to ensure supply reliability, then the control area jurisdiction of such dually connected DISCOMs must remain with the state.
- (xvi) The following are the difficulties in allowing a Bulk Consumer or DISCOM in dual connectivity:
- i. Modality of control Area jurisdiction issues
 - ii. Tagging of Schedules through different paths (ISTS, STU, ISTS through STU, STU through ISTS, etc.)
 - iii. Application of Losses and Charges Calculation of DSM/RTDA
 - iv. Computation of TGNA Collective Charges

Comments of CTUIL

- (xvii) Dual Connectivity to bulk consumers may be allowed, and unlike generation projects, bulk consumers pay transmission charges corresponding to GNA quantum in ISTS and open access in the intra-state system. The same should be with the mandatory requirement of STU NOC and the commitment of the bulk consumer to pay the transmission charges for ISTS
- (xviii) With Dual connection, Bulk Consumer can source/schedule RE power from ISTS

and RE/non-RE from intra-state. Waiver in ISTS for GNA_{RE} can be calculated on scheduled/drawn RE power from ISTS, as both ISTS and intra-state feeders shall be metered. Accordingly, a bulk consumer having a connection with STU may also be allowed for the grant of GNA_{RE} from ISTS

Comments of CEA

(xix) Dual connectivity to bulk consumers may not be allowed as it would lead to a suboptimal transmission system. If bulk consumers wish to use the ISTS network for green power, they can do so while remaining connected to the STU system by paying applicable transmission charges. On the other hand, if they wish to connect to ISTS but also wish to conduct banking with Discoms, they can do so through the ISTS network by paying appropriate transmission charges.

87. From the above, the views of the stakeholders appear mixed; however, the majority of comments are in favour of allowing dual connectivity to Bulk consumers but with STU's NOC and payment commitment for both transmission systems by such drawee entity. Some stakeholders also raised the technical issue in granting dual connectivity to bulk consumers, control area issue and misuse of the provision of the waiver of the transmission charges if it is allowed to seek GNA_{RE} from ISTS.
88. We observe that with upcoming diversity in the drawee entities, where Data Centre, Green Hydrogen/Ammonia plant, iron/aluminium/smelter industry may require dual connectivity with availability of round-the-clock and economical power supply. However, we have consciously considered the comments of stakeholders, especially Discoms, which suggested that such connectivity would lead to a double transmission system and hence such entities should not be permitted to use GNA_{RE} , and the transmission charges due from them would fall upon the Discoms. CEA also suggested not allowing dual connectivity as it would lead to a sub-optimal transmission system. To address these concerns, it is proposed that such an entity seeking dual connectivity will be eligible to apply for GNA, not GNA_{RE} . However, the waiver of transmission charges for drawing RE Power under GNA, as applicable, shall remain available to such entity in terms of the Sharing Regulations, 2020.
89. Further, the technical issues of system planning, bi-directional power flow and overloading the intra-State or ISTS, as the case may be, the Nodal Agency will grant GNA to such entity only after carrying out the technical studies.
90. The control area jurisdiction shall be as per the Grid Code. Considering the above discussions, a new Regulation 17.5 has been proposed to be added under the GNA

Regulations, as under:

“17.5 Connection to ISTS and intra-state transmission system or distribution system by drawee entities

- (1) A drawee entity connected to an intra-State transmission system or distribution system may seek to connect to ISTS directly as an applicant under Regulation 17.1(iii), for such drawl capacity for which it is already connected to intra-state transmission system or distribution system along with consent of the concerned STU clearly specifying the quantum of Connectivity to STU or Distribution system, as the case may be. Such an entity shall continue to pay the applicable charges under the Act and regulations framed therein.*
- (2) A GNA grantee covered under Regulation 17.1(iii) of these regulations may get connected to the intra-state transmission system or the distribution system of the State as allowed as per the concerned State Regulations after obtaining consent of the Nodal Agency that such a connection is technically feasible and subject to payment of applicable charges under the Act and regulations framed therein. Such entity shall confirm quantum of Connectivity to STU or Distribution system, as the case may be, to the nodal agency.*
- (3) The Applicants under Clauses (1) and (2) of this Regulation shall not be applicable to entities having GNARE unless GNARE is converted to GNA.”*

Amendment to clause (d) of Regulation 22.2 (Payment of One-time GNA Charge)

91. Clause (d) of Regulation 22.2 provides as under:

“(d) Entities covered under Regulation 4.1 and clause (iii) of Regulation 17.1 of these regulations shall furnish one-time GNA charge for Rs. one lakh per MW for the quantum of GNA one month prior to the effective date of GNA. In case, such charges are not furnished by the entity within the specified timeline, the same shall be recovered by encashment of Conn-BG1, Conn-BG2 and Conn-BG3 as required. The proceeds of such one-time GNA charge shall be used for reducing Monthly Transmission Charges under the Sharing Regulations;

As per the above, the entity covered under Regulation 4.1 and clause (iii) of Regulation 17.1 shall furnish a one time GNA charge one month prior to the effective date of GNA.

92. It has been brought to our notice through various Petitions and the representations received from the RE developers and JCC minutes that the effective date of GNA keeps shifting depending on the delay of the transmission licensee. In such circumstances, there are cases where CTUIL sought one time GNA charges one month prior to the likely effective date of GNA, but the actual effectiveness date shifted since the transmission element could not achieve COD by the likely date.
93. Considering the above issue, it is proposed that one-time GNA charges may be furnished within 15 days of the date of effectiveness of the GNA.
94. We note that there are cases where a generating station achieves COD before GNA effectiveness also. In such a case, Conn-BGs might have been returned after one year of achieving COD as proposed in this amendment. Hence, to recover one-time GNA

charges, in case Conn-BGs are not subsisting and the entity fails to furnish the one-time GNA charge within the stipulated time, such entity should not be allowed to do transactions with the Grid until it pays the one time GNA charges.

95. Accordingly, the main paragraph of clause (d) of Regulation 22.2 has been proposed to be amended as under:

*“(d) Entities covered under Regulation 4.1 and clause (iii) of Regulation 17.1 of these regulations shall furnish one-time GNA charge for Rs. one lakh per MW for the quantum of GNA **within 15 days of the effective date of the GNA**. In case, such charges are not furnished by the entity within the specified timeline, the same shall be recovered by encashment of Conn-BG1, Conn-BG2 and Conn-BG3 as required. **In case no Conn-BGs are subsisting and entity does not furnish the required charges, such entity shall not be eligible for carrying out any transactions with the Grid**. The proceeds of such one-time GNA charge shall be used for reducing Monthly Transmission Charges under the Sharing Regulations;”*

Amendment to Regulation 22.4 of the GNA Regulations

96. CTUIL has raised an issue about difficulties in implementing Regulation 24.6 due to transmission elements being implemented under the RTM mechanism. When such an element is proposed under deemed COD, the Commission approves this deemed COD. In such cases, the Transmission Licensee proposing the deemed COD files a petition seeking approval, but the adjudication process may take time to complete. Until the Commission approves the deemed COD, CTUIL may be unable to make the GNA effective, since the GNA can only become effective when all elements identified for that GNA achieve COD (including deemed COD). Consequently, CTUIL may not be able to take any action under Regulation 24.6 of the GNA Regulations due to the absence of a GNA effectiveness date. The issue raised is generic. Given that numerous elements are being implemented under RTM, clarification is required on how to treat the GNA's effective date in such cases.

97. In this regard, we have perused clause (1)(c) of Regulation 27 of the Grid Code, as under:

“27. DECLARATION OF COMMERCIAL OPERATION (DOCO) AND COMMERCIAL OPERATION DATE (COD)

- (1) A generating station or unit thereof or a transmission system or an element thereof or ESS may declare commercial operation as follows and inform CEA, the concerned RLDC, the concerned RPC and its beneficiaries:*

.....

(c) Transmission System

.....

Provided also that in case a transmission system or an element thereof executed under regulated tariff mechanism is prevented from regular service on or after the scheduled COD for reasons not attributable to the transmission licensee or its supplier or its contractors but is on account of the delay in commissioning of the concerned generating station or in

commissioning of the upstream or downstream transmission system of other transmission licensee, the transmission licensee shall approach the Commission through an appropriate petition along with a certificate from the CTU to the effect that the transmission system is complete as per the applicable CEA Standards, for approval of the commercial operation date of such transmission system or an element thereof:

.....”

As per the above, if a transmission system or an element thereof executed under a regulated tariff mechanism is prevented from regular service under specified conditions, the transmission licensee is required to obtain a CTU completion certificate.

98. It is proposed that CTUIL issue a completion certificate in such cases, and such a certificate can be utilized for the purpose of making the GNA effective.
99. Considering the above, the following new proviso has been proposed to be added in clause (a) of Regulation 22.4 of the GNA Regulations:

“Provided also that in case an element of augmentation or terminal bay is under Regulated Tariff Mechanism, and the licensee implementing such element have approached CTU for completion certificate under Regulation 27(1)(c) of the Grid Code, for purpose of deemed COD, the Nodal Agency shall consider the date of issuance of certificate of completion by CTU under the Grid Code for such element for purpose of date of effectiveness of the GNA, which shall be subject to revision as decided while approving such deemed COD by the Commission.”

New Regulation 23A (Transfer of GNA)

100. CTUIL, vide letter dated 09.03.2026, raised the issue of the transfer of GNA from one entity to another entity. The relevant extract of this letter is as under:

“In this regard, it may be noted that Tata Steel Limited was granted 68 MW General Network Access Renewable Energy (GNA-RE) under Regulation 17.1 (ii) of the CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2022 vide intimation dated 16.11.2023 as drawee entity connected to Intra State transmission system at 220kV level at 400/220 kV New Duburi Grid Substation of OPTCL. The GNA RE became effective on 01-10.2025 and is valid until May 31, 2050.

Subsequently, TATA has intimated that it is presently in the process of selling its drawee entity to Indian Metals & Ferro Alloys Limited (IMFA) and that IMFA Limited intends to use the same 68 MW GNA-RE at the same location from 1st June 2026. Further, TATA has requested CTU to approve the handover of the existing 68MW GNA-RE from TATA in favour of the new owner i.e. IMFA Limited.

In this regard, it may be noted that under the prevailing GNA Regulations, there is no explicit provision permitting transfer of GNA from one entity to another. GNA Regulations only recognize utilization of GNA by another entity subject to the latter entity also being a GNA grantee (Regulation 23.1). Further, it may also be noted that transfer is recognized for “Connectivity” under Regulation 15 in a limited and restricted manner i.e. inter se Parent and subsidiary company(ies) only. Therefore, the pari materia provision also cannot be extended to permit the transfer as requested by TATA. In this regard, a letter dated 25.02.2026 has been addressed to TATA clarifying this position.

However, considering that similar requests may be received by CTU, the regulatory provisions may kindly be reviewed to explicitly provide for such cases.

As per the above, CTUIL requested that regulatory provisions regarding the transfer of GNA may be explicitly provided.

101. Regulation 15.3 of the GNA Regulations provides as under:

“On achieving COD of full capacity or such split part in terms of Regulation 15.2 of these regulations, Connectivity shall be transferred to the entity implementing the REGS (whose documents were furnished by the Connectivity Grantee for meeting compliance of Financial Closure and COD under Regulation 11A(5) of these regulations, on an application made by the REGS to the Nodal Agency for transfer of Connectivity for the full capacity or the split capacity, as the case may be”

As per the above, Connectivity can be transferred to the entity implementing the project upon achieving the CoD of the project.

102. We note that the issue raised by CTUIL is that there may be genuine requirements where the entity seeks GNA for drawal at a specific drawal point (may be for a specific load) and sells such load to another entity. As the GNA in the said case has been obtained for an identified load, a provision is proposed to transfer the specific GNA taken for that load to the new entity buying such load. However, such a transfer would be permitted only after the GNA has become effective, akin to a permitted transfer in the case of a generating station. Liabilities, if any, of the original grantee must be cleared prior to effecting the transfer. Considering the above, a new Regulation 23A has been proposed as under:

“23A Transfer of GNA

An entity which has been granted GNA under clauses (i) to (vi) of Regulation 17.1 of these Regulations, for drawal at a single point for identified load, where such load is connected to intrastate transmission system or distribution system or ISTS and where such load is itself sold to another entity, the GNA shall also be transferred to such new entity owning the load, subject to the condition that such transfer shall be permitted after GNA is effective. Such transfer shall be processed after clearing all dues, if any, by the entity to whom GNA was granted.”

Amendment under the GNA Regulations subsequent to the Second Amendment to the CERC Cross Border Regulations

103. The Commission has notified the Central Electricity Regulatory Commission (Cross Border Trade of Electricity) (Second Amendment) Regulations, 2025, which include the necessary provisions for applying for the grant of GNA/ T-GNA in the course of Cross-Border transactions. Accordingly, the provisions pertaining to Cross-Border transactions under the GNA Regulations need to be deleted. The same was proposed in the EM to the draft second amendment to the Cross-Border Regulation, which is extracted below:

*“6. Further, in order to consolidate the applications for connectivity, GNA or T-GNA in the course of Cross border trade in electricity, the trading licensee of India shall also make separate applications for injection into or drawl from the Indian grid under Cross Border regulations. **On finalization of this amendment, the provisions related to cross border trade shall be deleted from the GNA Regulations.** If any electricity trading licensee of India has been granted GNA or T-GNA under the GNA Regulations, the same shall be transitioned under the CBTE Regulations. For such transition, the Conn-BGs submitted by such trading licensee under the GNA Regulations shall be considered under the CBTE Regulations.”*

104. Accordingly, clause (iv) under Regulation 17.1, Regulation 20.2, clause (c) of Regulation 22.2, clause (b) of Regulation 26.1 and sub-clause (iv) of clause (a) of Regulation 28.5 of the GNA Regulations have been proposed to be deleted.

Amendment to clause (1) of Annexure (IV) to the GNA Regulations

105. Sub Regulation 9.3.2 of Regulation 9.3 provides as under:

“9.3 Change of Source(s):

.....

*9.3.2 **On receipt of a request for a change of source, the Nodal Agency may carry out system studies, as required, and approve or reject the change of renewable energy source(s), within 30 days of application by the Applicant.** Upon approval of such a change in renewable energy source(s), the entity shall submit the technical connection data for the changed renewable energy source(s) and the Nodal Agency shall then incorporate the necessary change in the connectivity agreement, if already signed.”*

As per the above, upon receipt of a request to change of source, the Nodal Agency shall process the application within 30 days of receipt.

106. CTUIL has raised the issue of processing multiple applications under Regulation 5.2 or Regulation 5.11, along with a change in source at the same location with a different processing timeline, but keeping the order of date and time stamp. The applications under Regulation 5.2 or Regulation 5.11 are processed by the CTUIL as per the timeframe under Regulation 7.1 and 7.2, i.e, within 60 days and 90 days, respectively, from the last day of the month in which the application has been received, whereas applications under Regulation 9.3 are to be processed within 30 days.

107. The principle of processing the applications under the GNA Regulations is in terms of date and time stamp of the application. Further, the application under Regulation 9.3 leading to change in non solar hour access rights at the concerned pooling station within 30 days may lead to a situation where application received under Regulation 5.2 and 5.11 at the same pooling station in the same month, on a date earlier than the date of application under Regulation 9.3, is not able to get such non solar hour access at such ISTS location. Therefore, it is proposed that for cases where applications have

been received under Regulation 5.2, 5.11 and 9.3 in the same month at a single location, the change in source application under Regulation 9.3 should be processed along with the processing of the application received under Regulation 5.2 and 5.11 in terms of their date and time stamping. However, where no such application under Regulations 5.2 or under Regulation 5.11 has been received in the same month, at the same location where an application under Regulation 9.3 has been received, the change in source application can be processed in terms of the time under Regulation 9.3.

108. Accordingly, the necessary provision has been incorporated at clause (e) of the illustration under clause (1) of Annexure-IV of the GNA Regulations as under:

“e) For cases covered under sub-clause (c) or (d) where multiple applications of source change, 5.2 and 5.11 have to be processed, the timeline of processing each application shall be subject to the condition of the maximum permitted processing timeline of any of the applications.”

Amendment to Regulation 39.1

109. As several modifications have been proposed under the Draft Fourth Amendment to the GNA Regulations, changes to the Detailed Procedure for Connectivity and GNA may be required to be incorporated by the Nodal Agency after stakeholders' consultation. Accordingly, the necessary provision has been incorporated in Regulation 39.1.

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