NOTIFICATION NO. L-1/261/2021/CERC DATED 11.11.2026

CERC Notifies Fourth Amendment To The GNA Regulations

Background

The CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2022 ("**GNA Regulations**") were published on 19.07.2022 and have been amended three times since. On 11.11.2026, CERC notified the CERC (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2026 ("**Fourth Amendment**"), which come into force from the date of their publication in the Official Gazette. **[Cl. 1 @Pg. 1]**

The Fourth Amendment is a substantial revision. Among other things, it gives grantees facing long delays a way out, ties the land and financial closure milestones to the effective date of GNA, eases route conversion and group-company compliance, sets a minimum storage duration for ESS, and brings forward the return of Conn-BGs. Each of these is covered below.

Key Changes

1. **One-time exit from Connectivity (new Regulation 3.10)**

   Notwithstanding Regulations 3.7 to 3.9, an entity can now withdraw its Connectivity in full where there has been a delay of two years or more, either (i) between the in-principle grant and the final grant, or (ii) between the 'likely start date' in the in-principle grant and the start date in the final grant. The request has to be made within 45 days of the final grant. Where no final grant has been issued two years after the in-principle grant, the request can be made within 45 days of the end of those two years. Partial withdrawal is not allowed.

   CTUIL must process the request within 15 days. Once an entity withdraws, all Conn-BGs and the Land BG are returned, and only the application fee is forfeited. Entities whose 45-day window has already lapsed can still apply within 30 days of the Fourth Amendment coming into force. **[Cl. 3 @Pg. 2; Reg. 37.11(a) @Pg. 16]**

2. **Land and financial closure milestones (Regulations 11A and 11B)**

   Financial closure: Under the substituted Regulation 11A(2), REGS (other than hydro), ESS (other than PSP) and Renewable Power Park Developers must submit their financial closure documents within 30 days of the effective date of GNA. Acceptable documents are a loan sanction letter, proof of first disbursement, or a Board resolution where the project is to be fully funded internally, together with net worth details. Earlier, financial closure was required at least 6 months before SCOD. The requirement does not apply where the full capacity has already achieved COD. **[Cl. 16.3 @Pg. 9-10]**

© 2026 SKV LAW OFFICES · ALL RIGHTS RESERVED

As a transitional relief, an LoA/PPA-route project gets an additional two months if its new financial closure deadline falls within two months of the Fourth Amendment but its earlier deadline fell later. **[Reg. 37.11(f) @Pg. 17]**

Land documents: New Regulation 11A(1A) requires REGS (other than hydro) and ESS (other than PSP) granted Connectivity under the LoA/PPA route to submit land documents within 60 days of the effective date of GNA, unless they have already done so. Failure to comply is now a ground for action under Regulation 11B(1). The first proviso to Regulation 11A(1) has also been extended to cases where only an in-principle grant has been intimated at an ISTS substation. **[Cl. 16.1, 16.2, 16.9 @Pg. 9-11]**

3. Routes, conversion and group companies

The Fourth Amendment now formally defines the three routes for seeking Connectivity: the "LoA route"/"PPA route" under Regulation 5.8(xi)(a), the "Land route" under Regulation 5.8(xi)(b) and the "Land BG route" under Regulation 5.8(xi)(c). **[Cl. 2 @Pg. 1-2]**

Multi-location projects: Where a single LoA/PPA covers projects at different locations (including in different States), Connectivity can be sought at each location, up to the lower of the LoA/PPA quantum and the installed capacity at that location. If a location relies partly on the LoA/PPA and partly on land or Land BG, the LoA/PPA quantum is used first and the balance can be used elsewhere. **[Cl. 10.2 @Pg. 5-6]**

Conversion: A grantee under the land or Land BG route may convert to the PPA route, in part or in full, on the basis of a PPA executed by itself or by its parent, subsidiary or group company. The reference to an LoA has been deleted, so conversion is now possible only against a PPA. Multiple applications at the same bay or substation can be converted together. If the quantum left under the land route after conversion is below 50 MW, it is treated as relinquished, and the Conn-BG3 and Land BG for that quantum are returned. Conn-BG1 and Conn-BG2 remain in place against the converted quantum. **[Cl. 16.4-16.7 @Pg. 10]**

Group companies and sub-lease: Conditions subsequent and COD can now be met through a parent, subsidiary or group company. Responsibility still rests with the grantee, which must file an authorisation from that entity. Sub-lease deeds are also accepted as land documents where the lease permits it, but only between a parent and its subsidiaries (or among subsidiaries of the same parent), or where Government land is sub-leased under Government policy. **[Cl. 10.1, 10.3, 16.8 @Pg. 5-11]**

4. ESS, non-solar hour access and additional capacity

Minimum storage duration: An ESS seeking Connectivity must have an energy capacity (MWh) of at least twice its power capacity (MW), unless CEA notifies otherwise. Where REGS is installed with an ESS under Regulation 5.11 and that ESS does not meet this requirement, the REGS will have no injection scheduling rights under the ESS's GNA during non-solar hours. **[Cl. 4.1, 12 @Pg. 3, 7]**

Non-solar hour Connectivity: REGS/ESS of 50 MW and above can now seek non-solar hour Connectivity at substations other than those notified under Regulation 4.5(a). CTUIL must publish a monthly list of such substations and their available margins. Grants will be made only within existing margins and without any ISTS augmentation, and the applicant must enter into an agreement with the original bay holder within 6 months to share the dedicated transmission system and its costs. Applicants may also, with written consent, switch between full-day, solar-hour and non-solar-hour access, based on the margins declared at the consultation meeting. **[Cl. 6 @Pg. 3;**

© 2026 SKV LAW OFFICES · ALL RIGHTS RESERVED

Cl. 33 @Pg. 17-18]

Additional capacity: Capacity installed only to meet technical requirements at the injection point is excluded from installed capacity for Connectivity. For additional capacity under Regulation 5.2, the application fee is Rs. 5 lakh (50 MW and above) or Rs. 1 lakh (below 50 MW), and the Land BG may be furnished either by the existing grantee or by the entity setting up the additional capacity. An ESS may set up REGS purely for charging, and no land or financial closure requirements apply to such REGS. Connectivity for additional capacity stands relinquished or revoked along with the original Connectivity. The Land BG for ESS (other than PSP) is fixed at Rs. 5 lakh/MW. **[Cl. 7, 8, 10.4 @Pg. 3-7]**

5. Change of source and closure of applications

An application for change of source can now be made up to 6 months before the firm start date, instead of 18 months. A second change of source is also permitted, on payment of Rs. 20,000/MW of the gross change, or Rs. 25,000/MW where land parcels also change, subject to a minimum of Rs. 10 lakh per application. The fee must be paid within 15 days, failing which the permission stands revoked. A second change of land parcels is likewise allowed. **[Cl. 11, 15 @Pg. 7-9]**

Under the substituted Regulation 6.3, CTUIL will close an application and refund the application fee and all BGs in full where (a) it cannot carry out the interconnection study because of load-generation balance or related issues, or (b) the competent authority does not approve the identified augmentation. Pending applications and existing grants that fall in these categories will be dealt with under the Detailed Procedure. **[Cl. 13-14 @Pg. 7-8; Reg. 37.11(d)-(e) @Pg. 16]**

6. Return of Conn-BGs (Regulations 16.2 and 37.6)

Earlier, Conn-BG2 and Conn-BG3 were released in five equal instalments over five years from COD (or from the effectiveness of additional GNA under Regulation 37.6). They will now be returned in full within one week after one year from COD or GNA effectiveness. Where that year has already passed, the BGs must be returned within one month of the Fourth Amendment coming into force, subject to clearance of transmission charge dues. **[Cl. 20, 29 @Pg. 12, 15; Reg. 37.11(b)-(c) @Pg. 16]**

7. GNA-related changes

One-time GNA charge: Entities under Regulations 4.1 and 17.1(iii) must pay a one-time GNA charge of Rs. 1 lakh/MW within 15 days of the effective date of GNA. If the charge is not paid, CTUIL may encash the Conn-BGs, and where there are no Conn-BGs, the entity cannot transact on the grid until it pays. **[Cl. 24.3 @Pg. 13]**

Effective date for RTM elements: Where a transmission licensee has approached CTU for a completion certificate for the deemed COD of an RTM element under Regulation 27(1)(c) of the Grid Code, GNA will take effect from the date of that completion certificate, subject to revision once CERC approves the deemed COD. **[Cl. 25 @Pg. 14]**

Dual connection: A drawee entity connected to the intra-State network may also connect directly to the ISTS for part (at least 50 MW) or all of its drawal, with the consent of the STU/distribution licensee. An entity holding GNA under Regulation 17.1(iii) may similarly connect to the intra-State network. In both cases, charges are payable on both networks, including cross-subsidy surcharge, additional surcharge, transmission, wheeling and standby charges. This does not apply to GNA(RE) holders unless they convert to GNA. **[Cl. 22 @Pg. 12-13]**

© 2026 SKV LAW OFFICES · ALL RIGHTS RESERVED

Transfer: Connectivity of a generating station or ESS that has achieved COD will now pass to the transferee when the asset is sold or acquired, with the Conn-BGs substituted and the Connectivity Agreement amended. Under new Regulation 23A, GNA may also be transferred along with an identified load, or along with a generating station/ESS after COD, subject to clearance of dues. **[Cl. 17-19, 26 @Pg. 11-15]**

Other changes: T-GNA under Regulation 26.1 now extends to injecting entities and ESS connected to the intra-State network, including through trading licensees. Regulations 17.1(iv), 20.2 and 22.2(c), and the proviso to Regulation 28.5(a)(iv), have been deleted. **[Cl. 21, 23, 24, 27, 28 @Pg. 12-15]**

8. Detailed Procedure

CTUIL has 60 days from notification, i.e., by about 10.01.2027, to (i) submit for CERC's approval a Detailed Procedure under Regulation 24.6, and (ii) revise the existing Detailed Procedure, in each case after stakeholder consultation. **[Cl. 32 @Pg. 17]**

FOR FURTHER INFORMATION PLEASE CONTACT

Kanika Chugh
MANAGING PARTNER
Kanika.chugh@skvlawoffices.com

© 2026 SKV LAW OFFICES · ALL RIGHTS RESERVED