

**CENTRAL ELECTRICITY REGULATORY COMMISSION
NEW DELHI**

Petition No. 202/MP/2023

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

Petitioner : TP Saurya Limited (TPSL).

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

Petition No. 272/MP/2023

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

Petitioner : NTPC Limited (NTPC).

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

Petition No. 236/MP/2023

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

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

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

Petition No. 286/MP/2023

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

Respondent No. 2 from taking coercive action against the Petitioner till such time.

Petitioner : Azure Power Maple Private Limited (APMPL).

Respondent : Northern Regional Load Despatch Centre (NRLDC) and Ors.

Petition No. 335/MP/2023

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

Petitioner : NTPC Limited (NTPC).

Respondent : Southern Power Distribution Co. of Telangana Ltd. and Ors.

Petition No. 16/MP/2024

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

Petitioner : Ostro Kannada Power Private Limited (OKPPL).

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

Petition No. 40/MP/2024

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

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

Respondent : PTC India Limited (PTCIL) and Ors.

Petition No. 81/MP/2024

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

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

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

Petition No. 82/MP/2024

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

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

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

Petition No. 25/MP/2024

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

Petitioner : NTPC Green Energy Limited (NGEL).

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

Petition No. 43/MP/2024

Subject : Petition under Section 79 of the Electricity Act, 2003 read with Article 12.2 of the Power Purchase Agreement dated 19.11.2019 entered between Adani Wind Energy Kutchh Five Limited (formerly known as Adani Green Energy Five Limited) and Solar

Energy Corporation of India Ltd. seeking reliefs for the additional expenditure incurred due to occurrence of Change in Law event.

Petitioner : Adani Wind Energy Kutchh Five Limited (AWEKFL).

Respondent : Solar Energy Corporation of India Limited and Ors.

Petition No. 49/MP/2024

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

Petitioner : Ayana Renewable Power Six Private Limited (ARPSPL).

Respondent : Solar Energy Corporation of India Limited and Ors.

Petition No. 57/MP/2024

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

Petitioner : Tata Power Renewable Energy Limited (TPREL).

Respondent : Solar Energy Corporation of India Limited and Ors.

Petition No. 139/MP/2024

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

Petitioner : Talettutayi Solar Projects Nine Private Limited (TSPNPL).

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



Petition No. 334/MP/2024

Subject : Petition under Section 79(1)(b) and 79(1)(f) of the Electricity Act, 2003 read with the Central Electricity Regulatory Commission (Conduct of Business) Regulations, 2023 and Article 12 of the Power Purchase Agreement dated 14.6.2022 seeking in-principle declaration that the Working Group Report, 2022 is a Change in Law event and grant of consequential reliefs thereto.

Petitioner : ReNew Surya Aayan Private Limited (RSAPL).

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

Petition No.121/MP/2024

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

Petitioner : Solar Energy Jaisalmer Two Private Limited (SEJTPL).

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

Petition No. 124/MP/2024

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

Petitioner : TP Saurya Limited (TPSL).

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

Petition No. 142/MP/2024

Subject : Petition under Section 79(1)(b) and (f) of the Electricity Act, 2003 read with Regulation 65 of the Central Electricity Regulatory Commission (Conduct of Business) Regulations, 2023 and Article 12 of Power Purchase Agreements dated 28.6.2016 and 4.11.2017 seeking in principle approval of occurrence of Change in Law event i.e. Issuance of Central Electricity Authority (Technical Standards for Connectivity to the Grid) (Amendment) Regulations, 2019 and the Working Group Report, 2022.

Petitioner : Tata Power Renewable Energy Limited (TPREL).

Respondent : NTPC Limited (SECI) and Ors.

Petition No. 195/MP/2024

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

Petitioner : TP Saurya Limited (TPSL).

Respondent : Rewa Ultra Mega Solar Limited and Ors.

Petition No. 98/MP/2024

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

Petitioner : Adani Wind Energy Kutchh Six Limited (AWEKSL).

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

Petition No. 519/MP/2024

Subject : Petition under Section 79(1)(b) and 79(1)(f) of the Electricity Act, 2003 read with CERC (Conduct of Business) Regulations, 2023 and Article 12 of the PPA dated 14.6.2022 seeking in principle declaration that the Working Group Report, 2022 is a change in law event.

Petitioner : ReNew Surya Vihaan Private Limited (RSVPL).

Respondent : Solar Energy Corporation of India Limited & Ors.

Petition No. 115/MP/2025

Subject : Petition under Section 79(1)(b) and 79(1)(f) read with Section 29 of the Electricity Act, 2003; read with the applicable provisions of Power Purchase Agreement dated 19.4.2022 executed between the Petitioner and the Respondent No. 1 and the relevant provisions of the applicable laws inter alia seeking Change in Law claims with respect to the requirements to comply with the various new parameters and changes introduced by way of the Working Group Report, 2022 read with various Minutes of Meeting(s); and the Central Electricity Authority (Technical Standards for Construction of Electric Plants and Electric Lines) Regulations, 2022, inter alia for the Petitioner's 300 MW Solar Power Project in Bikaner, Rajasthan and reliefs for seeking extension of time inter alia to comply with the aforesaid requirements.

Petitioner : Ayana Renewable Power Three Private Limited (ARPTPL).

Respondent : Solar Energy Corporation of India Limited & Ors.

Petition No. 117/MP/2025

Subject : Petition under Sections 79(1)(b) and 79(1)(f) read with Section 29 of the Electricity Act, 2003; read with the applicable provisions of Power Purchase Agreements both dated 7.12.2018 executed between the ACME Dhaulpur Powertech Private Limited and ACME Deoghar Solar Power Private Limited, and Solar Energy Corporation of India Limited, respectively, and the relevant provisions of the applicable laws inter alia seeking Change in Law reliefs with respect to the requirements to comply with the various new parameters and changes introduced by way of the Working Group Report, 2022 read with various Minutes of Meeting(s).

Petitioner : ACME Dhaulpur Powertech Private Limited & Anr (ADPPL).

Respondent : Solar Energy Corporation of India Limited & Ors.

Petition No. 146/MP/2025

Subject : Petition under Sections 79(1)(b) and 79(1)(f) read with Section 29 of the Electricity Act, 2003; read with the applicable provisions of Power Purchase Agreements dated 06.12.2018 executed between ACME Raisar Solar Energy Private Limited and Solar Energy Corporation of India Limited, and ACME Phalodi Solar Energy Private Limited and Solar Energy Corporation of India

Limited, along with the relevant provisions of the applicable laws inter alia seeking Change in Law reliefs with respect to the requirements to comply with the various new parameters and changes introduced by way of the Working Group Report, 2022 read with various Minutes of Meeting(s).

Petitioner : ACME Raisar Solar Energy Private Limited and Anr (ARSEPL).

Respondent : Solar Energy Corporation of India Limited & Ors.

Petition No. 145/MP/2025

Subject : Petition under section 79(l)(b) & (f) of the Electricity Act, 2003 read with Regulation 65 of the CERC (Conduct of Business) Regulation, 2023 and Article 17 of the Power Purchase Agreements dated 17.04.2017 seeking declaration of working group committee report, issued by the central electricity authority, as a change in law event as well as other consequential reliefs.

Petitioner : Megasolis Renewables Private Limited (MRPL).

Respondent : Rewa Ultra Mega Solar (RUMS) Limited & Ors.

Petition No. 144/MP/2025

Subject : Petition under Sections 79(1)(b) and (f) the Electricity Act, 2003 read with the regulation 65 of the CERC (Conduct of Business) Regulation, 2023 and article 12 of the 'EPA dated 28.12.2018 read seeking declaration of working group committee report, issued by the CEA, as a change 'in law event as well as other consequential reliefs.

Petitioner : Megasolis Renewables Private Limited (MRPL).

Respondent : Solar Energy Corporation of India Limited & Ors.

Petition No. 116/MP/2025

Subject : Petition under Sections 79(1)(b) and (f) the Electricity Act, 2003 read with the regulation 65 of the CERC (Conduct of Business) Regulation, 2023 and article 12 of the PPA dated 31.5.2020 read with amendment-01 dated 10.12.2021 read seeking declaration of working group committee report, issued by the CEA, as

Petitioner : Mega Suryaurja Private Limited (MSPL).

Respondent : Solar Energy Corporation of India Limited & Ors.

Date of Hearing : **16.7.2025**



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

Parties Present : Shri Venkatesh, Advocate, TPSL, NTPC, NGEL, TPREL, TSPNPL
Shri Suhael Buttan, Advocate, TPSL, NTPC, NGEL, TPREL, TSPNPL
Ms. Priya Dhankar, Advocate, TPSL, NTPC, NGEL, TPREL, TSPNPL
Shri N. Bhatnagar, Advocate, TPSL, NTPC, NGEL, TPREL, TSPNPL
Ms. Drishti Rathi, Advocate, TPSL, NTPC, NGEL, TPREL, TSPNPL
Shri Aniket Prasoon, Advocate, APMPL, ARPSPL, ARPTPL, ACME, ARSEPL
Shri Aman Sheikh, Advocate, APMPL, ARPSPL, ARPTPL, ACME, ARSEPL
Shri Adarsh Bhardwaj, Advocate, APMPL, ARPSPL, ARPTPL, ACME, ARSEPL
Ms. Archita Kashyap, Advocate, APMPL, ARPSPL, ARPTPL, ACME, ARSEPL
Ms. Tanya Bajaj, Advocate, APMPL, ARPTPL, ACME, ARSEPL
Shri Mridul Gupta, Advocate, OKPPL, RSAPL, RSVPL
Shri Ashabari Thakur, Advocate, OKPPL, RSAPL, RSVPL
Shri Amit Kapur, Advocate, AWEKOL, AGEMPL, AWEKTL, AWEKFL,
Shri P Sengupta, Advocate, AWEKOL, AGEMPL, AWEKTL, AWEKFL,
Shri Saunak Rajguru, Advocate, AWEKOL
Ms. Sakshi Kapoor, Advocate, AGEMPL, AWEKTL, AWEKFL,
Shri P Sharma, Advocate, AWEKOL, AGEMPL, AWEKTL, AWEKFL,
Shri Aditya K Singh, Advocate, UPPCL
Ms. Anukriti Jain, Advocate, UPPCL
Shri Divyansh Singh, Advocate, UPPCL
Shri Gaurav Dudeja, Advocate, UPPCL
Ms. Anumeha Smiti, Advocate, UPPCL
Shri Nishant Thakur, Advocate, UPPCL
Ms. Sneha Singh, Advocate, APSPDCL
Shri Vyom Chaturvedi, Advocate, APSPDCL
Shri Nitin Gaur, Advocate, MPPMCL
Shri Anshul Singh, Advocate, MPPMCL
Shri Avijeet Lala, Advocate, CESC
Ms. Neha Das, Advocate, CESC
Shri Ravi Sharma, Advocate, CSPDCL
Shri Aryan Chanda, CSPDCL
Shri Tarun Johri, Advocate, DMRC
Shri Ankur Gupta, Advocate, DMRC

Shri Ravi Kishore, Advocate, PTC
Shri Keshav Singh, Advocate, PTC
Shri Hemant Singh, Advocate, SBSRE
Shri Lakshyajit Singh, Advocate, SBSRE
Shri Harshit Singh, Advocate, SBSRE
Shri Hitendra, Advocate, GRIDCO
Shri Sourav Roy, Advocate, MOL
Shri Anand Ganesan, Advocate, RUVNL
Shri Amal Nair, Advocate, RUVNL
Shri M.G. Ramachandran, Sr. Advocate, CTUIL
Shri Shubham Arya, Advocate, CTUIL
Shri Rishabh Saxena, Advocate, CTUIL
Ms. Shree Dwivedi, Advocate, CTUIL
Shri Prabhas Bajaj, Advocate, KSEBL
Shri Rithvik Mathur, Advocate, KSEBL
Shri Rishabh Rai, Advocate, KSEBL
Ms. Shikha Ohri, Advocate, SECI
Shri Kartik Sharma, Advocate, SECI
Ms. Mandakini Ghosh, Advocate, SECI
Shri Rahul Ranjan, Advocate, SECI
Shri Sajan Poovayya, Senior Advocate, MRPL & MSPL
Ms. Nipun Sharma, Advocate, MRPL & MSPL
Shri Deepak Thakur, Advocate, MRPL & MSPL
Ms. Abiha Zaidi, Advocate, Grid India
Shri Anuj Manoj Bhavé, Advocate, Grid India
Shri Alok Mishra, Grid India
Ms. Himani Dutta, Grid India
Shri Anuj Bhavé, WRLDC
Shri Prashant Garg, NRLDC
Shri Kamaldeep, NRLDC
Shri Asif, NRLDC

Record of Proceedings

During the course of the hearing, the learned senior counsel representing the Petitioners in Petition Nos.145/MP/2025 & Ors. and the learned counsels representing the Petitioners in Petition Nos. 43/MP/2024 & Ors. (Adani) and Petition Nos. 117/MP/2025 & Ors. (ACME & Ayana) made elaborate submissions asserting that the Working Group Report, 2022, constitutes a Change in Law event under the respective Power Purchase Agreements.

2. After hearing the learned senior counsels and learned counsels for the parties, the Commission directed the Petitioners to file on an affidavit within three weeks the following information:

(a) The reactive power requirements specified in the respective Request for Selection ("RfS") /bidding documents/PPAs.

(b) The Petitioners in Petition Nos. 286/MP/2023, 16/MP/2024, 40/MP/2024, 81/MP/2024, 82/MP/2024, 43/MP/2024, 49/MP/2024, 334/MP/2024, 121/MP/2024,

236/MP/2023, 98/MP/2024, 519/MP/202, 116/MP/2025, 144/MP/2025, 145/MP/2025, 146/MP/2025, 117/MP/2025 and 115/MP/2025 to submit the information called for vide Record of Proceedings for the hearing dated 29.4.2025.

(c) The Petitioners have furnished design temperatures ranging from 35° C to 50° C. As per CEA standards, extreme temperatures were required to be considered. The Petitioners are to clarify the basis for considering such a design temperature, along with supporting documents, such as historical data on extreme temperatures at the location of the project or some other basis, as applicable. Petitioners to submit the change in design temperature, if any, post issuance of the Working Group Report, vis-à-vis the design temperature envisaged by the petitioner at the time of planning of the project.

(d) Petitioners in Petition No. 286/MP/2023, 49/MP/2024, 146/MP/2025, 117/MP/2025, and 115/MP/2025 may be directed to submit the information asked for vide RoP for hearing dated 16.1.2025.

3. The Respondents, Grid India-RLDCs, were directed to submit the following information on an affidavit within three weeks:

(a) Information called for vide RoP for the hearing dated 16.1.2025 in Petition Nos. 124/MP/2024, 98/MP/2024, 519/MP/2024, 146/MP/2025, 117/MP/2025, and 115/MP/2025.

(b) The following sample data for five instances (for both injection and absorption) in respect of each Petitioner, before and after the implementation of the working group report, when the Petitioners had provided the reactive power support to the grid:

| | Before WGR 2022 (if applicable based on COD of project) | | | | | | After WGR 2022 | | | | |
|------------|---|-------------------|----------------------|-----------------------------------|--|------------|---------------------|-------------------|----------------------|-----------------------------------|--|
| | Date and time block | Grid Voltage (kV) | Active Power (in MW) | Reactive Power requirement (MVar) | Reactive power support provided to the Grid (MVar) | | Date and time block | Grid Voltage (kV) | Active Power (in MW) | Reactive Power requirement (MVar) | Reactive power support provided to the Grid (MVar) |
| Instance 1 | | | | | | Instance 1 | | | | | |
| Instance 2 | | | | | | Instance 2 | | | | | |
| Instance 3 | | | | | | Instance 3 | | | | | |
| Instance 4 | | | | | | Instance 4 | | | | | |
| Instance 5 | | | | | | Instance 5 | | | | | |

4. The Parties were also directed to complete the pleadings and file their respective written submissions/note of arguments within three weeks.

5. The matters remain part-heard and will be listed for hearing **on 9.9.2025 at 2.30 P.M.**

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