



Open Access PPA Approval Timelines in India 2026: Process, Delays and Strategy

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A practical 2026 guide to open access approval timelines, SLDC workflows, charges, delays and contracting strategy for C&I buyers.

Open-access PPAs in India live or die on execution speed as much as on tariff. A project that looks viable at Rs 4.35/kWh landed cost can slip above Rs 5.00/kWh if commissioning and approvals drift, temporary utility supply continues longer than planned, or banking and scheduling rights start later than expected. In 2026, this timing risk is no longer a side issue. It is central to procurement strategy for C&I consumers, developers, lenders and advisors.

Many recent discussions have focused on banking, captive compliance, change-in-law, site selection and third-party versus group captive structures. A less discussed but equally material issue is approval timeline risk: the gap between PPA signing and the date on which power can actually flow under long-term open access. In practice, that gap can be 45 days in a streamlined case or 180-plus days when state workflows are fragmented, substation capacity is constrained, or metering and connectivity milestones are not aligned.

This article looks at open access approval timelines in India in 2026: what the process usually involves, where delays arise, how those delays affect landed cost and financing, and what developers and C&I buyers should build into transaction documents and project plans.

Why approval timeline risk matters in 2026

For a corporate buyer, the business case is typically evaluated on three numbers:

- PPA tariff at project busbar or injection point
- Open access charges and losses
- Expected annual energy drawdown versus contracted generation

But the realised business case depends on a fourth variable: when supply starts in a stable, billable form.

Consider a 20 MW solar open access transaction for a manufacturing customer consuming 3.2 million units per month. If the buyer expects supply from July 2026 but open access starts only in October 2026, the buyer may continue to procure from DISCOM at, say, Rs 7.20 to Rs 8.80/kWh effective industrial tariff for three extra months. Even if the PPA saves Rs 1.80/kWh versus grid power once operational, the delayed savings can materially weaken first-year economics.

For developers, a similar mismatch creates:

- Merchant exposure if the plant is ready but long-term offtake cannot commence
- Working capital stress if receivables are delayed
- EPC completion and liquidated-damages disputes if evacuation and approvals are outside direct control
- Refinancing risk if lenders require stable operational evidence before full disbursement or term conversion

In 2026, these issues are magnified by tighter C&I procurement scrutiny. Corporate energy teams are no longer looking only at headline tariff. They are asking about:



- Approval lead time by state
- Synchronisation between connectivity, metering and SLDC permissions
- Temporary versus final OA treatment
- Curtailment and scheduling rights before final LTOA/MTOA/STOA activation
- Cost of pre-COD and post-COD delays

The typical open access approval chain

The exact process varies by state and by whether the transaction is intra-state or inter-state, but most long-term C&I open access deals involve some version of the following sequence:

- Land control and project development readiness
- Connectivity application to DISCOM/STU/CTU as applicable
- Evacuation approval and bay/substation feasibility confirmation
- Metering scheme approval
- Execution of connection agreement and allied transmission documents
- Open access application to SLDC or nodal agency
- No-objection inputs from DISCOM, STU and transmission utility entities
- Energy scheduling and communication system readiness
- Synchronisation and commissioning approvals
- Registration of consumer end for drawal under OA framework
- Final commencement of billing under the PPA and network-use framework

In a group captive structure, there may also be parallel workstreams around shareholding, shareholder agreements, board approvals and proof of captive compliance architecture before drawal begins. In a third-party transaction, supply agreements and utility coordination are often simpler in ownership terms, but not necessarily faster in network and scheduling terms.

A practical 2026 timeline for a well-managed intra-state solar open access project might look like this:

- 2 to 4 weeks for application package readiness after commercial closure
- 4 to 8 weeks for connectivity and technical review where capacity is available
- 2 to 6 weeks for metering, protection and communication approvals
- 2 to 6 weeks for OA application review and issue of permission
- 1 to 3 weeks for final operational integration and scheduling start

That suggests 10 to 27 weeks in a realistic range, even before allowing for state-specific friction. For wind, wind-solar hybrid or projects with substation augmentation needs, timelines can be longer.

Where delays usually occur

Approval delays rarely arise from one dramatic issue. They typically come from small sequencing failures across multiple agencies.

1. Connectivity capacity assumptions are wrong

A site may look attractive on land and irradiation or wind resource, but available evacuation margin at the chosen substation can be overstated. If bay availability, transformer loading or line constraints are



unresolved, the file can stall for weeks.

This is why site selection and network diligence must be integrated. A tariff that is Rs 0.15/kWh lower at one site can be economically inferior if it adds 90 days to energisation.

2. Metering and communication readiness is treated as an afterthought

Special energy meters, ABT-compliant configurations, telemetry and communication links often become the last-mile bottleneck. Plants may be physically ready, but commercial energy accounting cannot begin because meter installation, testing or data integration is incomplete.

3. Consumer-side readiness is not aligned

The generator may be commissioned, but the C&I buyer's receiving infrastructure, feeder mapping, sanctioned demand alignment or utility-side tagging for open access may lag. This is common where the buyer is adding a new plant line, changing contract demand, or restructuring multiple service connections into one procurement plan.

4. Documentation quality is weak

Missing annexures, inconsistent single-line diagrams, unsigned undertakings, mismatch in contracted capacity figures, or outdated board resolutions can each trigger re-submission cycles. In some states, a 7-day clarification delay can quickly become 21 to 30 days in practice.

5. The PPA start date is disconnected from approval reality

Some transactions still define supply start using aggressive scheduled COD assumptions without enough protection for approval slippage. That can force renegotiation, create deemed-generation arguments, or push both parties into avoidable disputes.

Cost impact of timeline slippage

Approval delays are often discussed operationally, but they should be quantified financially.

Take a 15 MW solar project supplying around 26 million units annually to a commercial and industrial portfolio. Assume:

- PPA tariff: Rs 3.40/kWh ex-bus
- Total OA charges and losses equivalent: Rs 1.10/kWh landed adjustment
- Delivered landed cost: about Rs 4.50/kWh
- Alternative DISCOM power cost: Rs 6.60/kWh average effective rate
- Net expected savings: Rs 2.10/kWh

If supply start is delayed by 60 days and monthly energy draw would have been about 2.15 million units, missed savings are roughly:

- 2.15 million units x 2 months x Rs 2.10/kWh
- Approximately Rs 90 lakh

That excludes:

- Additional demand charges or fixed charges under utility supply
- Possible backing-down of generation if plant is commissioned but offtake is not active
- Interest during delay or working-capital carry



- Internal transaction-management cost

For a 25 MW wind-solar hybrid deal with landed savings of Rs 1.50 to Rs 2.50/kWh and more complex scheduling, the cost of a quarter's delay can easily cross Rs 1.5 crore to Rs 3 crore depending on utilisation and substitution profile.

This is why timeline diligence belongs in investment committee papers and board approvals, not just in the operations tracker.

What should be built into the PPA and project documents

The contracting package should recognise that approvals are not binary. They progress in stages, and rights and obligations should follow that reality.

Key drafting themes in 2026 include:

- Clear definition of Scheduled COD, Actual COD and Supply Commencement Date
- Separate treatment of plant readiness versus OA approval readiness
- Long-stop dates linked to specific approvals, not generic delay language
- Allocation of responsibility for generator-side and consumer-side approvals
- Backstop treatment if temporary open access is available before long-term access
- Curtailment and must-run treatment during interim operation
- Change in metering or scheduling protocol as a pass-through only where objectively evidenced
- Exit, capacity reduction or phased commencement rights if approvals are materially delayed

For group captive deals, documentation should also align approval timing with capital contribution and share allotment milestones. If consumption begins before captive structure formalities are stable, future compliance arguments can become messy.

Well-structured transactions also connect approval milestones to payment mechanics. For example:

- Security deposit release only after operational milestones
- Delayed-commissioning LDs adjusted for approval dependencies outside EPC control
- Payment start tied to actual scheduled energy delivery rather than nominal commissioning

This is where disciplined [PPA structuring & negotiation]([coreservices/greenenergyppa/ppastructuringandnegotiation]) can preserve value far more effectively than chasing a few paise lower headline tariff.

State process strategy: do not treat India as one market

Open access in India remains state-shaped. Even in 2026, process quality differs significantly across jurisdictions in terms of portal maturity, nodal clarity, responsiveness, technical scrutiny and precedent stability.

A practical state process screen should include:

- Historical time from application filing to OA permission
- Whether online filing actually reduces turnaround or simply digitises manual review
- Typical interval for metering approval and testing
- Frequency of curtailment or scheduling disputes after approval



- Clarity of banking and energy-accounting procedures
- Track record of monthly billing reconciliation
- Consumer-category specific treatment for HT industrial loads

For cross-state deals, add:

- CTU/STU coordination complexity
- Inter-state scheduling readiness
- Additional communication-system and registration steps
- Alignment of project COD with drawal-state permissions

One recurring market mistake is evaluating states only on headline charge exemptions or lower wheeling cost. A state with nominally better charges but repeated approval lag can produce worse first-year IRR than a state with slightly higher charges but faster and more predictable start-up.

This is why good [Sourcing strategy](/coreservices/greenenergyppa/sourcingstrategy) for C&I buyers should compare not just tariff and charges, but time-to-power and probability-weighted delay cost.

How buyers and developers can shorten the timeline

The best-performing transactions in 2026 tend to follow a few common practices.

Build an approvals critical path before signing

Before executing the final PPA, prepare a milestone map covering:

- Land and connectivity status
- Substation and bay availability
- Metering architecture
- OA application dates
- Consumer-end readiness
- Target synchronisation date
- Earliest realistic supply date

This should be reviewed jointly by commercial, technical and regulatory teams.

Use a single source of truth for project data

Capacity, injection voltage, delivery point, consumer account details, sanctioned demand and single-line diagrams should be identical across PPA, application forms, metering notes and utility submissions.

Do consumer-end diligence early

For multi-plant buyers, open access success often depends on the drawal side. Feeder constraints, billing-circle practices, contract demand issues and metering arrangements should be checked before financial close.

Create fallback operational plans

If long-term OA is delayed, parties should know whether short-term access, temporary merchant sale, intra-group balancing or staggered consumer onboarding is feasible.

Integrate economics with approvals planning



A strong [Demand & ToD analysis](/coreservices/greenenergyppa/demandandtodanalysis) helps determine whether delayed start in a given quarter meaningfully affects value. For example, if the buyer's high-tariff peak load season is July to September, a post-monsoon start may destroy a large portion of Year 1 savings even if annual generation assumptions remain unchanged.

Use active approvals management, not passive filing

Open access files rarely move optimally if they are simply submitted and awaited. The process requires follow-up, clarification management, coordination between generator and consumer entities, and rapid closure of technical comments. This is where disciplined Open-access approvals support can materially reduce slippage.

What lenders, utilities and policymakers should note

Lenders should increasingly underwrite approval risk explicitly. That means stress-testing:

- Delay between mechanical completion and commercial supply start
- Interim sale assumptions if offtake activation slips
- Counterparty exposure during transition phase
- State-specific process precedent rather than generic India assumptions

Utilities and policymakers, for their part, should recognise that approval opacity acts like an economic surcharge. Even where formal charges are competitive, unpredictable process timing raises risk premium, weakens bankability and slows industrial decarbonisation.

Three policy improvements would have immediate market impact:

- Standardised application checklists with deemed-complete acknowledgement timelines
- Transparent portal-based status visibility across connectivity, metering and OA steps
- Defined escalation and deemed-approval principles for non-discretionary milestones

These changes would not eliminate legitimate network scrutiny. But they would reduce avoidable commercial uncertainty.

The 2026 takeaway

In open access, tariff is only the visible part of the value equation. The hidden variable is approval time. A project with a compelling ex-bus tariff can still underperform if connectivity, metering, SLDC processing and consumer-side readiness are not aligned from day one.

For C&I buyers, the right question is not only, what is my landed tariff, but when does the first billable unit realistically flow and what is the cost if that date slips by 30, 60 or 90 days?

For developers, approvals planning should sit alongside land, resource and EPC in core project execution. For lenders, it belongs in disbursement logic and downside cases. For policymakers, process certainty is now a competitiveness issue.

If your organisation is evaluating an open access or corporate PPA transaction, contact Growthifye's advisory desk for support on transaction planning, approvals pathway, landed-cost assessment and execution strategy.

Explore Growthifye's related capabilities



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