एनएलसी इंडिया लिमिटेड
(भारत सरकार का 'नवरत्न' उद्यम)
135, ई.वी.आर.पेरियार हाई रोड,
कीलपॉक, चेन्नई- 600 010.

NLC INDIA LIMITED
('NAVRATNA' Govt. of India Enterprise)
135, EVR Periyar High Road,
Kilpauk, Chennai-600 010.

वाणिज्य विभाग / COMMERCIAL DEPARTMENT

सी.आई.एन / CIN : L93090TN1956GOI003507 जी.एस.टी.एन / GST No : 33AAACN1121C1ZG पी.ए.एन / PAN : AAACN1121C
दूरभाष / Phone : 044-28369112 फैक्स / Fax : 044-28360057 वेबसाइट / Website : www.nlcindia.in
ई–मेल / E-mail : commercial@nlcindia.in

Lr.No. NLCIL/Comml/F 1100/2026-56 Dt: 28.05.2026

To
The Secretary,
Central Electricity Regulatory Commission,
7th Floor, Tower B, World Trade Centre,
Nauroji Nagar, New Delhi-110029

Sir,

Sub: CERC Staff Paper on "Shortening the scheduling Timeline for Real Time Markets in India" - NLCIL comments - submission - Reg.

Ref: Public Notice No. RA-14026(12)/1/2026-CERC, Dated 06.05.2026

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Pursuant to the communication of CERC Staff Paper on "Shortening the scheduling Timeline for Real Time Markets in India" vide ref cited above, seeking comments of the stakeholders, NLCIL is hereby submitting its comments.

The comments have also been mailed to secy@cercind.gov.in and skchatterjee@cercind.gov.in.

Thanking you,

Yours faithfully,

for NLC India Limited

General Manager / Commercial

SURESH KUMAR R
General Manager / Commercial
NLC INDIA LIMITED
('Navratna' Govt. of India Enterprise)
No.135, EVR Periyar High Road,
Kilpauk, Chennai - 600 010.

Encl: As above

NLCIL's Comments on CERC Staff Paper on "Shortening the scheduling Timeline for Real Time Markets in India"

NLCIL welcomes the proactive initiative taken by the Central Electricity Regulatory Commission (CERC) through its staff paper for shortening the scheduling timeline for Real Time Market (RTM). Truncation in scheduling timeline will undoubtedly enhance grid stability, which is essential under the high integration of non-conventional Renewable Energy (RE) sources and the required flexibility support from conventional energy sources. Furthermore, this will effectively minimise Deviations in generations & corresponding Deviation Settlement Mechanism (DSM) penalties for both RE and thermal generators.

However, before proceeding with implementation, ensuring a baseline level of automation across all market participants and scheduling entities is critical. Insufficient technological readiness risks a severe reduction in RTM market liquidity and may inadvertently compromise grid security. In light of this, NLCIL respectfully submits the following comments and suggestions for kind consideration:

1. Technological readiness & Infrastructure synchronization across SLDCs:

The success of the proposed compressed timelines relies heavily on robust software automation, flawless real-time data exchange, and absolute communication reliability. Currently, operational and automation capabilities vary significantly across State Load Despatch Centres (SLDCs) in India.

Many SLDC scheduling portals lack API provisions to fetch the latest scheduling data or automatically update RTM-traded quantities within their scheduling systems. Such automated workflows are fundamental to execute RTM operations with compresses timelines.

Under the existing scheduling automation and communication systems across India's diverse SLDCs, a shortened timeline could result in sell or buy bids being entirely wiped out, leading to a reduction in the market liquidity and undermining fair price discovery.

Hence it is suggested that minimum technical readiness standards must be mandated and verified through regulatory frameworks before enforcing the new timelines. Additionally, operational system protocols must be strengthened with adequate redundancies to prevent single-point failures. A uniform Web-Based Energy Scheduling platform (WBES) across all Regional Load Despatch Centres (RLDCs) and State Load Despatch Centres (SLDCs) would solve many of the coordination and inter-operability issues that currently exist between regions and states.

2. Availability of Final DC and Schedule Data with the Generator or Trader for RTM Bidding:

Under the current RTM framework, although Declared Capability (DC) and Schedule data are theoretically available during the X-5 block (i.e., T-75 to T-60), practically, this data gets available only after T-72 (three minutes after gate closure for schedule revision).

Consequently, even with automated API-enabled portals, the actual 15-minute RTM window is compressed to just 12 minutes of active bidding time. The proposed framework shrinks the nominal RTM bidding window to just 5 minutes.

Therefore, it is observed that if there is any further delay in the reflection of final DC and Schedule data at the Bidding desk, the effective time available for RTM bidding may shrink to less than 5 min also. Such an extremely limited window could lead to significant operational stress, increase the likelihood of bidding errors and ultimately result in inefficient market participations & subsequent price discovery.

3. Streamlining Real-Time NOC Data Retrieval from NOAR for RTM bidding:

Currently, for a single RTM session, the Power Exchange fetches the real-time NOC quantum permissible for RTM bidding from the National Open Access Registry (NOAR) four times as below

- Before 13 mins of start of bidding window.
- Before 7 mins of start of bidding window.
- Before 1 min of start of bidding window.
- After 6 mins of start of bidding window.

Historical data shows that the final NOC quantum occasionally updates only during the final fetch (i.e. After 6 mins of start of bidding window). Consequently, any bids submitted within the first 6 mins are automatically rejected, whereas the exact same bids submitted after the 6th min are accepted once the correct NOC quantum updates at Power Exchange end.

In a truncated 5-minute bidding market, such synchronization delays will render compliant bids impossible to execute. So, it is suggested that at the starting of bidding window, instantaneous availability of final NOC quantum data at the Power Exchanges must be structurally guaranteed alongside final DC and schedule datasets.

4. Transitioning from half-hourly RTM (48 sessions in a day) to a fully granular 15 min time block wise RTM market (96 sessions in a day):

While the staff paper seeks to bring RTM closer to real-time delivery to balance the grid and eliminate fluctuations, the proposed mechanism still leaves the second block of each RTM session significantly lagged behind the gate closure compared to the first block.

To fully realize the core objective of the staff paper, it is humbly submitted that CERC should consider introducing 96 distinct RTM sessions per day (shifting from half-hourly to a fully granular 15-minute block-wise market). This evolution will allow market participants to fine-tune bids symmetrically, ensuring all delivery blocks receive an equal, optimal decision-making window to minimize DSM penalties.

5. Impact on Rule 9(1) of MoP LPS Amendment Rule 2024 on Fixed cost recovery for a generating company on account of URS power:

As per NLDC procedure for Ministry of Power, Government of India Electricity (Late Payment Surcharge and related matters) Rules 2022, and amendment thereof,

Under the Section F Sale of power not requisitioned by a Distribution Licensee - "In case generator cannot place the URS quantum in the Power Exchange due to any technical glitch in the NOAR or Power Exchange software, the same bid shall be considered as deemed offered for computation of availability of the generator."

The current provision protects the generator only against technical glitch or infrastructure failures at the central nodes (NOAR/Exchanges), remaining silent on any technical glitch at generator/ trader end while submitting bids.

Several instances were observed in past, where critical RTM bids were missed solely due to local network issues or localized software glitches during the limited RTM bidding timeframes.

As the staff paper proposes toward a highly compressed timeline, it is only equitable that similar regulatory protections be clearly extended to include technical glitches at the bidding end. We request that a reasonable "tolerance level" framework also may be established to determine and safeguard eligible fixed charges for generating companies in such instances.