serentica

To
The Secretary
Central Electricity Regulatory Commission
World Trade Centre, 6th, 7th and 8th Floor,
Tower-B, Nauroji Nagar, New Delhi – 110029

Date: 28.05.2026

Subject: Comments/ Suggestions on the CERC's Discussion Paper on Shortening the scheduling Timeline for Real Time Markets in India, dated 06.05.2026.

Dear Sir,

At the outset, we would like to express our sincere appreciation to the Hon'ble Commission for initiating the discussion on shortening the scheduling timeline for Real Time Markets (RTM) in India through the Discussion Paper dated 06.05.2026. The proposed reduction in scheduling timelines is a welcome step towards enhancing grid efficiency and reliability. A shorter scheduling horizon will help reduce the deviation between forecasted and actual generation, thereby contributing significantly to grid stability while also reducing the financial burden on Renewable Energy (RE) developers arising from forecast inaccuracies.

In this regard, we would like to submit the following comments and suggestions for the Commission's kind consideration:

1. **Shortening of bilateral scheduling timeline**

Under the existing framework for bilateral transactions, revisions in schedules are implemented in the 7th/8th time block prior to the delivery of power. With the proposed reduction of one time block in the RTM schedule implementation timeline, it is imperative that the bilateral scheduling timeline is also correspondingly reduced by one time block, i.e., revisions should be implemented in the 6th/7th time block prior to delivery.

Such a change should be implemented immediately, as it would substantially improve forecasting accuracy and reduce the mismatch between forecasted and actual generation. This will ultimately support more efficient grid operations and lower deviation-related liabilities for market participants, particularly RE generators.

2. **Progressive reduction in RTM scheduling timeline to 15 minutes**

While we appreciate the Hon'ble Commission's proposal to reduce the RTM scheduling timeline from 75 minutes to 50 minutes, we respectfully submit that the scheduling timeline may be further reduced in a phased manner to 15 minutes.

We suggest the following phased approach:

75 minutes → 50 minutes → 30 minutes → 15 minutes

A shorter scheduling timeline will enable generators and system operators to more effectively respond to sudden weather variations and other real-time changes affecting generation and demand. This would be a progressive step towards strengthening grid stability and improving the integration of renewable energy into the grid.

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Further, RE generators are presently facing significant financial implications due to longer schedule implementation timelines, which limit their ability to align schedules with actual generation. A reduced timeline would help mitigate such losses and create a more efficient and responsive market framework.

3. **Allow RE Generators to buy power from RTM Market**

Clause no. 6.(3) of the Central Electricity Regulatory Commission (Power Market) Regulations, 2021 states as follows:

"In the event of a forced outage of a generating station or unit thereof, or any other event as may be notified by the Commission, wherein the obligation of the generating station to supply electricity continues under an existing contract, such generating station may fulfil its obligation under the said contract by entering into a contract(s) covered under clause (1) or (2) or (3) of Regulation 5 of these regulations."

As per the above provision, RE generators are currently permitted to procure power from the power market only in cases of forced outage or other events specifically notified by the Commission. However, we respectfully submit that RE generators should also be permitted to participate in the power market for procurement of power in situations where they are unable to meet their committed schedules due to unforeseen weather fluctuations.

Weather variability is inherent to renewable energy generation and remains beyond the control of RE developers. Penalising generators for such uncontrollable events imposes an undue financial burden on the sector. Allowing RE generators to procure power from the RTM market would enable them to better fulfil their PPA obligations while maintaining overall grid discipline.

Further, similar mechanisms are already being adopted in renewable energy-intensive countries such as Germany to effectively manage supply-demand imbalances arising from renewable energy variability.

We request the Hon'ble Commission to kindly consider the above suggestions favourably while finalising the framework for shortening the scheduling timeline for Real Time Markets in India.

Thanking you.

Yours faithfully,
For Serentica Renewables India Pvt. Ltd.



Kunal L Kaistha
Vice President – Regulatory & Policy