Organization Name: Manikaran Power Limited

Comments and Suggestions on Staff Paper on shortening the Scheduling timeline for Real Time Market in India

Sl. No.	Issue / Topic	Comments	Suggestions / Recommendations
1	Compatibility of Proposed T-50 Timeline with Existing 7th/8th Block Revision Framework	The proposal to reduce the scheduling timeline from T-75 to T-50 shifts the revision deadline for the 00:00 hrs delivery block from 22:45 hrs to 23:10 hrs. However, under Regulation 49.4(c) of the Indian Electricity Grid Code (IEGC) Regulations, 2023, schedule revisions become effective based on the existing 7th/8th block methodology. A revision submitted at 23:10 hrs falls within the 23:00–23:15 block and may technically become effective only from 00:30 hrs instead of 00:00 hrs. This creates inconsistency with the current block-based scheduling architecture and may lead to ambiguity in schedule finalization, WBES processing, RTM alignment, DSM accounting, market settlement, and grid operation protocols.	Suitable amendments may be carried out in the relevant provisions of the IEGC Regulations, 2023 to align the proposed T-50 framework with the existing scheduling logic. Proper stakeholder consultation may also be conducted before implementation of the revised scheduling framework.
2	Automation-Driven Efficiency	The proposal to reduce the scheduling timeline from 75 minutes to 50 minutes is progressive considering the implementation of platforms such as the National Open Access Registry (NOAR) and increased automation in scheduling and market operations. However, successful implementation of a compressed operational timeline would require robust coordination and real-time data exchange among all stakeholders.	The Commission may consider mandating standardized API-based integration among Power Exchanges, NLDC, RLDCs, SLDCs, WBES platforms, and trading licensees. Uniform communication protocols, automated data exchange standards, real-time synchronization mechanisms, and adequate redundancy and cyber-security systems may also be implemented to avoid operational disruptions and manual bottlenecks.
3	Proposed Timeline and Operational Constraints	Under the proposed framework, the revision of schedule for the 00:00–00:30 delivery block closes at 23:10 hrs followed immediately by the RTM bidding window from 23:10 hrs to 23:15 hrs. Thereafter, NLDC is required to complete multiple sequential operational activities such as RTM clearing, congestion verification, SCUC/SCED optimization, Ancillary Services (TRAS) scheduling, and final schedule preparation within a highly compressed timeframe. The finalized schedules are then communicated to RLDCs, SLDCs, traders, generators, buyers, and other entities before delivery commences at 00:00 hrs. In such a compressed framework, any communication error, scheduling mismatch, WBES issue, transmission constraint mismatch, trader-level propagation error, or generator scheduling discrepancy may not be identified and rectified before commencement of delivery. This may create operational challenges for DISCOMs, Traders, Generators, and SLDC/RLDC scheduling teams, especially during	It is suggested that finalized schedules for the 00:00–00:30 delivery block should preferably be published by NLDC at 23:45 hrs instead of closer to the delivery time. This would provide stakeholders with a reasonable operational buffer to verify schedules, identify discrepancies, communicate errors, and take corrective action prior to commencement of delivery. Since the next RTM bidding window is scheduled between 23:40 hrs and 23:45 hrs, most processing activities related to the earlier cycle would already have been substantially completed, making publication of finalized schedules at 23:45 hrs operationally feasible.

4	Stakeholder Readiness and Transition Mechanism	While highly automated entities may be able to effectively participate within a 5-minute bidding window, several market participants, state utilities, and traders may face operational challenges during the initial implementation phase due to varying levels of automation and preparedness.	Before implementation of the revised framework, the Commission may direct Exchanges, NLDC, and Market Participants to conduct mock trial runs, shadow operations, and parallel simulation exercises for at least 2–3 months. Market participants such as Traders may also be allowed to test automated bidding systems and operational coordination mechanisms. A phased implementation approach would help identify technical bottlenecks, improve stakeholder preparedness, enhance operational confidence, and reduce implementation risks during live market