JSW Energy Comments on Discussion Paper on Shortening RTM Scheduling Timelines

We appreciate Hon'ble CERC's initiative to improve market efficiency, grid balancing, and renewable energy (RE) integration through optimization of Real-Time Market (RTM) timelines. The RTM has been instrumental in real-time balancing since its introduction in June 2020, and the proposed changes are timely given increasing RE penetration.

We broadly support the objective of reducing RTM scheduling timelines to enhance responsiveness and reduce DSM exposure, particularly for RE generators. However, ***the proposed reduction in scheduling lead time may impact participation from thermal generators due to limited ramping flexibility within shorter decision windows***.

Currently, RTM schedules are received at T-45 (X-3 block). The proposed shift to T-27 (X-2 block) reduces available response time, potentially constraining thermal generators' ability to offer un-requisitioned surplus, thereby affecting market liquidity.

Our key suggestions are:

1. **Separate Green RTM Segment**

   Introduce a dedicated **"Green RTM"** segment with reduced timelines for RE integration, while retaining existing RTM timelines for other generators, similar to DAM and G-DAM structure. This will improve RE forecasting efficiency without impacting thermal participation.

2. **Alternate Approach (if separate segment is not feasible):**

   a. Retain existing X-2 and X-3 timelines without reduction.
   b. Reduce RTM clearing phase (X-4) from 15 minutes to 5 minutes.
   c. Maintain a 10-minute bidding window (instead of 5 minutes) considering operational constraints and NOAR coordination. Possibility may be explored for fetching the NOC details immediately after gate closure for schedule revision.
   d. Ensure missed bids are not penalized over a full 30-minute block; consider aligning settlement to 15-minute delivery periods.

Implementation considerations:

- **Operational Readiness**: Adequate operational readiness across SLDCs/RLDCs and market participants may be required before implementation.
- **Technology & Automation:** Strong automation and integration with platforms such as NOAR, WBES, and SCED/SCUC.
- **Phased Implementation:** A phased rollout with pilot testing may help stakeholders adapt operationally and technically while minimizing system risks.
- **Market Liquidity:** Continuous monitoring may be required during the initial phase to assess the impact on liquidity and participation levels in RTM.

We support the objective of enhancing RTM efficiency and request Hon'ble CERC to consider these suggestions to ensure balanced participation of both RE and thermal generators while maintaining market liquidity and grid reliability.