CLEAN MAX FUSION POWER LLP

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Ref.: CMFPL/CERC/RTM/26-27 **Date: 28.05.2026**

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

Subject: Comments/Suggestions on the Staff Paper on "Shortening the Scheduling Timeline for Real Time Markets in India"

Dear Sir,

We, Clean Max Fusion Power LLP welcomes the initiative of the Hon'ble Commission in issuing the present Staff Paper on "Shortening the Scheduling Timeline for Real Time Markets in India". The introduction of the Real Time Market has significantly contributed towards improving grid balancing, facilitating better renewable energy integration, and enabling market participants to manage short-term power requirements more efficiently.

We the undersigned appreciate the Hon'ble Commission's objective of improving the efficiency and responsiveness of the Real Time Market, acknowledging the operational challenges arising from increasing penetration of variable renewable energy sources and the consequent need for a more dynamic and responsive scheduling framework. Such measures are expected to support more accurate scheduling, reduction in forecasting deviations, improved DSM management, and better integration of variable renewable energy generation, thereby benefiting generators as well as other market participants.

Clean Max Fusion respectfully submits the following comments for the Hon'ble Commission's consideration:

Our Submission:

1. **Submission on Reduction of Bidding Window**

While the objective of improving market responsiveness is appreciated, the proposed reduction of the RTM bidding window from 15 minutes to 5 minutes

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may pose practical challenges during implementation, particularly in situations involving technical disruptions or aborted market sessions.

In the event of system failure, session cancellation, communication delay, or technical disruption at the level of the Power Exchanges, NLDC, or RLDCs, market participants may be left with a highly compressed timeline to reassess positions and take market-related decisions, many of which still require manual intervention and commercial confirmation. Trading decisions in RTM are often dependent upon real-time operational inputs, generation availability, demand variations, and client-level confirmations.

2. Technical Readiness and Operational Preparedness

We further submit that thorough testing and validation of the technical infrastructure, software systems, and operational readiness of all concerned platforms and statutory authorities may be undertaken prior to implementation of the proposed framework. It is pertinent to note that even under the existing framework, instances of software delays, communication issues, and aborted sessions are occasionally experienced.

In such circumstances, uniform technological preparedness across all market participants cannot be presumed. Abrupt implementation of extremely compressed bidding timelines may disproportionately affect entities operating with semi-automated or manually supervised systems.

Suggestions

Therefore, it is humbly submitted that the proposed shortening of RTM timelines may preferably be implemented in a phased manner. The process may initially begin with mock sessions, and trial operations with stakeholders may be conducted to undertake proper system checks, operational testing, and accuracy prior to full-scale implementation. Such phased implementation and mock operations would help ensure operational stability and coordination amongst all stakeholders including SLDCs, RLDCs, NLDC, Power Exchanges, generators, traders, and distribution licensees.

Additionally, it is submitted that an appropriate contingency handling plan may be considered for situations involving delayed communication, API failures, exchange-level disruptions, or system downtime. Since the proposed 5-minute window leaves very limited operational buffer, robust backup communication systems and contingency procedures may be necessary to ensure smooth market functioning during such events. Adequate

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consideration may also be given to smaller market participants who may not presently have fully automated bidding and operational infrastructure.

We respectfully request the Hon'ble Commission to consider the above submissions while finalising the proposed framework. Further, kindly allow us an opportunity to participate in the public hearing for stakeholders.

Thanking you,

For and on behalf of M/s. Clean Max Fusion Power LLP



Authorised Signatory

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