Tata Power Comments on Discussion paper on Shortening the scheduling timeline for Real Time Markets in India, 2026

General Suggestion	
1	The discussion paper on compressing the scheduling timeline for RTM undoubtedly would help better integration of variable RE by reducing the exposure to the deviations occurring as a result of uncontrollable factors like weather. From the perspective of RE generation, we agree with the necessity of the changes and support the proposed framework; however, an aspect which we would like to draw your attention to is that the proposed reduction in the RTM scheduling timelines may impact the thermal generators. Under the present process, a thermal generator receives its RTM schedule in block X-3 (fig-3 of the discussion paper) at T-42 mins. However, under the proposed mechanism, this RTM schedule is received in X-2 (fig-4,) at T-27 mins. This reduction in lead time by 15 mins may result in the thermal generators being unable to offer the entire quantum of URS available because of limitation of ramp up/down rate. Accordingly, in order to protect the interest of both the RE and thermal generators, we propose the following: • A separate Green Real Time Market (G-RTM) segment with the reduced RTM timeline as proposed in the discussion paper. • Retain the existing RTM timelines for non-RE generators. This is being proposed analogous to the differentiation in products on offer in the DAM segment (GDAM for RE). In case the above is not feasible, the following suggestions may be considered:

S. No	Clause no and existing provision	Proposed changes/Suggestions	Rationale for clarification/amendment
2	**Table-2**: Revised Timeline for scheduling from the end of 'Revision in Schedule' till the 'delivery time block-X'	Proposed RTM Bidding time-line (X-4 of the figure- 4) to be increased from 5 mins to 10 mins and X-3 to be reduced from 15 mins to 10 mins along with the following modification: - **Block**: X-4 **Timeline**: (T-50) to (T-~~45~~40) **Phase**: Bidding window for RTM	After the gate closure for schedule revisions, revised schedules should first be reflected in WBES before start of RTM bidding window. This along with technical challenges such as internet latency, exchange portal slow down, API malfunction, internal server lag, etc. could result in missed bids, incorrect bids, partial bid submission, and failure to revise schedules.

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		• *Additional pre-requisite – Exchange platforms to ensure that correct NOC limit (updated after revision if any) should be available before RTM bid placement.* • Processing of DC and schedule revision requests received up to gate closure and preparation of injection and drawal schedules. • Processing of exigency T-GNA applications. • *NLDC to share corridor-wise ATC margins with Exchange.* • Bidding by market participants in Power Exchange platform for RTM and RTM-AS segments – to be finalized by T- ***40*** ~~60.~~	Further, a 5-minute bidding window may not be sufficient for coordination with an electricity trader wherever involved. Hence, the suggestion to increase the RTM bidding window from 5 mins to 10 mins. In view of the above, it is requested that adequate bidding timelines may be provided to ensure operational feasibility, compliance with regulatory provisions, and avoidance of unintended commercial implications arising out of technical or procedural constraints.
3	**Table-2:** Revised Timeline for Scheduling from the end of 'Revision in Schedule' till the 'delivery time block-X'	**Following modifications may be considered for inclusion in the revised timeline for scheduling:** **Block**: X-3 **Timeline**: (T-~~45~~ 40) to (T-30) **Phase**: RTM Clearing **Activities**: • Matching of buy / sell bids by power exchanges to obtain ~~provisional / unconstrained~~ solution ~~and its transmission to NLDC~~. based on available ATC margins shared by NLDC to the power exchanges in block X-4.	In order to increase timeline for RTM bidding window from 5 mins to 10 mins as well as remove duplicity in the processes, the need of provisional / unconstrained solution can be removed considering the facts that no more revision shall take place as well as NLDC can share corridor-wise ATC margins allocation in earlier step. Further, the future advent of market coupling between power exchanges, whenever it is operationalised, would also justify the reduction of block X-3 from 15 mins to 10 mins.

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		• ~~Verification of combined trade volumes against corridor-wise ATC margins and exchange-wise margin allocation~~. • ~~Fetching of ATC margins by power exchanges, r~~Running ~~constrained~~ final solution and transmission of ~~final~~ results to NLDC. • Verification of traded volumes against margins and trade acceptance.	
4	Clause no. 4	Adequate testing and mock sessions should be conducted.	Reducing the RTM bidding window may create challenges for smaller market participants, Entities with limited automation. Therefore, to ensure that market liquidity and participation are not adversely affected a brief period should be provided for mock sessions so that challenges can be identified and addressed before implementation.