CONTINUUM

CONTINUUM GREEN ENERGY LIMITED

(formerly known as Continuum Green Energy Private Limited and Continuum Green Energy (India) Private Limited)

To,
Shri. Harpreet Singh Pruthi,
Secretary,
CERC, 6th, 7th & 8th Floors, Tower B,
World Trade Centre, Nauroji Nagar,
New Delhi- 110029.

Date:- 28.05.2026

Subject: Suggestions and Comments on the Discussion Paper titled - Shortening the Scheduling Timeline for Real Time Markets in India

Respected Sir,

We are thankful to the Hon'ble Ministry for providing an opportunity for us to share suggestions and comments on Discussion Paper titled - Shortening the Scheduling Timeline for Real Time Markets in India.

In this regard, please find our comments provided in Annexure A, enclosed along with this letter.

We request Hon'ble Ministry to kindly consider our submissions, as may be considered appropriate by them.

Yours Sincerely,

For Continuum Green Energy Limited.

CONTINUUM GREEN ENERGY LIMITED

Authorized Signatory

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ANNEXURE A –
Suggestions and Comments on Discussion Paper by CERC on Shortening the Scheduling Timeline for Real Time Markets in India

Sr.	Para / Section	Relevant Provision in Discussion Paper	Observation/Comments	Rationale for Observation/ Comments
1	**Para 4.2 Section 5 (Table 2)**	The existing 15-minute RTM bidding window is proposed to be reduced to 5 minutes, on the basis that bidding operations can be performed quickly with automation in place.	Wind and solar generators rely on near-real-time weather forecasts to finalise their generation estimates before placing RTM bids. A 5-minute window may not provide sufficient time for RE generators to factor in last-minute weather changes, compute revised generation estimates, and submit accurate bids. This may inadvertently increase - rather than reduce - DSM exposure for RE generators, potentially leading to adverse financial implications if bids are not submitted accurately due to the limited time window provided.	**Request Regarding the Proposed 5-Minute Bidding Window** We humbly submit the following for the Hon'ble Commission's kind consideration: • Wind and solar generation estimates are highly sensitive to weather conditions in the 15-30 minutes preceding delivery. A compressed 5-minute window leaves very little time for RE generators to incorporate updated forecast data before bidding, potentially resulting in inaccurate bids and higher DSM penalties. • We respectfully request the Hon'ble Commission to consider an interim bidding window of 10 minutes for RE generators, which may be reviewed and reduced further once the Hon'ble Commission is satisfied with the operational experience gathered.
2	**Para 4.3 Para 3.5 Para 2.2**	Para 4.3 proposes reducing the schedule revision gate closure from T-75 to T-50 minutes before delivery. Para 3.5 records multiple stakeholders - including Avaada, NGEL, Tata Power, InWEA, Greenko, Juniper, and NSEFI - requesting the revision	Wind generation can change materially within 15-30 minutes due to sudden weather ramp events. A schedule locked at T-50 may still not accurately reflect the generator's resource availability at the time of actual delivery, leaving a window of unavoidable deviation and DSM exposure. Several	**T-50 is Gratefully Welcomed; We Humbly Request Exploration of a Roadmap to T-30** We are deeply grateful to the Hon'ble Commission for taking the important step of moving from T-75 to T-50. We respectfully submit the following additional requests: • We humbly request the Hon'ble Commission to

		window be shortened further to T-30 or as few as 2-3 time blocks before delivery.	stakeholders have highlighted this concern and specifically requested a further reduction to T-30 or closer.	consider presenting the T-50 framework as an interim step, with a committed roadmap to explore a further reduction to T-30 - or even 2-3 time blocks before delivery - within 18 to 24 months, consistent with the requests of multiple stakeholders recorded at Para 3.5 of the discussion paper. • We respectfully request the Hon'ble Commission to consider conducting a supervised trial run of the T-50 framework for a defined period before it is made mandatory, so that any operational gaps may be identified and addressed in advance. • We draw the Hon'ble Commission's kind attention to the fact that wind generation in particular can shift significantly within a 15-minute window due to sudden changes in wind speed and direction. A gate closure at T-30 would therefore be materially more beneficial to RE generators than T-50, and we humbly request the Hon'ble Commission to examine, in detail, the option of a gate closure at T-30, along with a clear implementation roadmap. We further request that the roadmap for the proposed T-30 time block may also consider providing sufficient time, say, a 10-minute window for bidding, to ensure accurate and informed participation by RE generators.

3	**Para 1.2 Para 3.1 Para 5.3**	Para 1.2 of the discussion paper acknowledges that RE curtailment is rising, largely due to system security concerns and high-frequency fluctuations. Para 3.1 and 5.3 suggest that shortening the RTM timeline will help reduce RE curtailment and manage DSM charges.	It is a welcome step to address the issue of RE curtailment rising due to systemic concerns by compressing the RTM timeline. But, RE curtailment in India arises from multiple structural causes - including transmission congestion, technical minimum floors of thermal plants, and over-frequency during peak solar hours - that are not addressed by shortening the gate closure alone. When an SLDC issues a curtailment instruction to an RE generator, the generator's actual injection falls below its schedule through no fault of its own. Under the current DSM framework, this deviation is penalised regardless of the cause, which is a deeply inequitable outcome for RE generators and their C&I customers.	**Request to Address Curtailment-Driven DSM Charges and Compliance with the Direction of the Hon'ble APTEL** We respectfully draw the Hon'ble Commission's kind attention to the following: • We humbly submit that the RTM timeline compression, while very welcome, addresses only forecast-mismatch-driven curtailment. We would be grateful if the Hon'ble Commission could simultaneously direct that curtailment data be reported quarterly by cause - distinguishing forecast error, transmission congestion, technical minimum constraints, and system security - so that the true impact of the proposed reform may be transparently measured. • Provided further that, the directions of the Hon'ble Appellate Tribunal for Electricity (APTEL) in Appeal No. 197 of 2019 need to be duly implemented while issuing the present Staff Paper, particularly in cases where curtailment has been carried out for reasons other than grid security. The Hon'ble APTEL has, inter alia, directed that: (i) curtailment of Renewable Energy for reasons other than grid security shall be compensated at the applicable PPA tariff, with the compensation methodology based on the

				POSOCO report; and (ii) the SLDC shall submit a monthly report to the State Commission detailing the reasons for any backing-down instructions issued to solar power plants. Also, The Electricity (Promotion of Generation of Electricity from Must-Run Power Plant) Rules, 2021 grant must-run status to RE power plants, preventing curtailment on commercial grounds. Curtailment is allowed only for grid security or technical constraints, with compensation payable to the generator as per the applicable agreement. In view of the above, we humbly request the Hon'ble Commission to ensure that the revised RTM framework is consistent with, and effectively gives due consideration to and effect of, these important directions of the Hon'ble APTEL.