SPDA/RV/2026/378 **May 27,2026**

To
Shri Harpreet Singh Pruthi
The Secretary
Central Electricity Regulatory Commission
6th,7th & 4th Floors, Tower B, World Trade Centre
Nauroji Nagar, New Delhi – 110029

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

Reference: Public Notice No.RA-14026(12)/1/2026-CERC dated 06.05.2026

Respected Sir,

Greetings from the Sustainable Projects Developers Association (SPDA).

At the outset, we would like to extend our warmest greetings and express our sincere appreciation for your time and our gratitude for your dedicated efforts in promoting the development of renewable energy projects in the country. Your consistent encouragement towards green power and unwavering support in facilitating the project developers has been a beacon of hope and inspiration.

In reference to the subject cited above, we would like to extend our sincere appreciation towards the initiative taken by this Hon'ble Commission regarding the shortening of the scheduling timeline for Real Time Market (RTM), which is expected to improve balancing efficiency, reduce forecasting errors, and facilitate better integration of renewable energy resources. In regard to the Staff paper issued vide above referred notice, we would like to submit our comments as follows:

S. No.	Issue / Proposal	SPDA Comments / Suggestions	Rationale
1	Increase in RTM Sessions	As the market ecosystem is becoming increasingly automated with implementation of NOAR and API-based bidding systems, the Commission may consider increasing the number of RTM sessions from the existing 48 sessions to 96 sessions per day.	Increasing the RTM sessions would enable market participants to undertake closer-to-real-time balancing and improve demand-supply matching, particularly for variable renewable energy generation. This would also support efficient portfolio optimization and reduction in DSM exposure.

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2	Validation Mechanism for Standing Clearance Quantum	At present, exchanges accept bids prior to opening of the bidding window; however, when the bidding window opens, the system validates the bid quantum against the standing clearance quantum. In cases where the bid exceeds the standing clearance quantum, the entire bid gets rejected. SPDA submits that an appropriate validation mechanism should be implemented at the time of bid placement itself. Alternatively, exchanges may provide an option to automatically restrict the bid quantum up to the standing clearance limit instead of rejecting the entire bid.	Such validation or auto-adjustment mechanism would improve market efficiency, avoid unnecessary bid rejections, reduce operational challenges for participants, and ensure better utilization of available transmission clearance.
3	DSM Relaxation in Case of RTM Session Aborts	Appropriate DSM relaxation should be provided to market participants in cases where RTM sessions are aborted due to system or operational constraints beyond the control of generators/discoms.	Since market participants rely on RTM for balancing their positions closer to delivery, any aborting of RTM sessions may adversely impact their ability to manage deviations. Providing DSM relaxation in such cases would ensure fairness and avoid penalization for circumstances beyond participants' control.
4	Automatic Reduction of Bid Quantum up to Standing Clearance Limit	Power Exchanges may provide an option for automatic reduction of bid quantum up to the permissible standing clearance limit instead of rejecting the complete bid.	Such a provision would improve bid acceptance efficiency, reduce operational risk, and avoid complete loss of market participation due to minor quantity mismatches.
5	Relief Mechanism for Technical Failures During RTM Window	Since the RTM bidding window is proposed for only 5 minutes, suitable compensation or relief mechanism may be considered where technical failure at exchange/system operator end prevents valid market participation.	This will ensure continuity of market operations and avoid unintended exclusion of participants, while also avoiding unnecessary burden of DSM on generators/buyers due to factors beyond their control.

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6	Further Reduction in Gate Closure Timeline	It may be considered to gradually reduce the gate closure timeline further to 30 minutes or lower in a phased manner based on operational experience and system readiness.	Further reduction in gate closure timelines would enable more accurate forecasting, improved balancing closer to delivery, and better integration of variable renewable energy resources.
7	Procurement of Power by WS Generators through RTM/DAM/GDAM	Wind and Solar (WS) generators may be allowed to procure power through RTM/DAM/GDAM for management of deviations and reduction of DSM exposure, considering that generation from such plants is largely dependent on weather conditions rather than controllable fuel-based generation.	Such a provision would provide flexibility to renewable energy generators for balancing deviations arising from weather variability, improve grid discipline, and reduce punitive DSM implications.

SPDA once again appreciates the efforts of the Commission in enhancing the efficiency and responsiveness of the power market framework and requests the Commission to kindly consider the above suggestions while finalizing the proposed framework.

We also humbly request this Hon'ble Commission to provide us an opportunity to present our detailed analysis on the subject matter alongwith our subject matter experts.

Thanking you,

Yours Sincerely,



Ravi Verma

Member, Governing Council

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