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

Subject: Submissions/Comments on Discussion Paper on Shortening the Scheduling Timeline for Real Time Markets

1. Introduction and Overall Perspective

We sincerely appreciate the initiative taken by the Hon'ble Commission to revisit and rationalize the scheduling and Real Time Market (RTM) timelines. This is a progressive and much-needed step, especially in the context of increasing penetration of renewable energy (RE) in the Indian power system.

As highlighted in the discussion paper, the variability and intermittency associated with wind and solar generation necessitate market designs that enable balancing as close to real time as possible. In this regard, the proposal to reduce the timeline between schedule revision and delivery from **75 minutes to 50 minutes** is a welcome move and aligns well with the operational requirements of RE generators.

We strongly support the broader objective of bringing gate closure closer to the delivery time and humbly submit that such timelines may be **further reduced in a phased manner**.

2. Concern Regarding Compression of RTM Bidding Window

While we appreciate the intent to improve efficiency, we would like to draw attention to the proposed redistribution of timeline reductions.

As per the proposal:

- Total reduction: **25 minutes (75 to 50 minutes)**
- Reduction in:
    - **RTM bidding window:** from 15 minutes to 5 minutes
    - Remaining reduction from operational processes (schedule preparation, clearing, etc.)

From a RE generator (IPP) perspective, this compression presents **practical operational challenges**, particularly for projects operating under hybrid or PPA-linked arrangements.

2.1 Operational Challenge for PPA-backed RE Projects

In several cases, RE generators:

- Have long-term PPAs with beneficiaries,
- Are allowed to sell **only surplus or incidental power in RTM** after meeting primary contractual obligations.

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Under the proposed framework:

- Schedule revisions must be completed **50 minutes prior to delivery**,
- RTM bidding window opens immediately thereafter (only **5 minutes available**),

This creates the following sequential challenge:

1. Final schedule revisions must be completed,
2. Updated generation forecasts must be reassessed,
3. Surplus quantum (if any) must be identified,
4. Bids must be prepared across potentially multiple projects and time blocks,
5. Bids must be submitted within **5 minutes**.

For portfolios comprising multiple assets, even with automation, the available time is **extremely constrained**, increasing the risk of:

- Bid errors,
- Missed opportunities,
- Sub-optimal participation.

We submit that while such a window may be manageable for pure merchant generators**,** it is operationally restrictive for PPA-backed RE projects**.**

3. Request for Proportionate Reduction Across Activities

In light of the above, we respectfully request that:

- The reduction in total timeline may be implemented in a **more proportionate manner across all activities**, including:
    - RTM bidding window,
    - RTM clearing,
    - SCUC/SCED processes,
    - Schedule preparation and communication.

Instead of disproportionately reducing the bidding window, a **balanced compression** would:

- Preserve operational feasibility for generators,
- Ensure effective market participation,
- Avoid bid-missing instances,
- Support efficiency without unintended exclusion.

We suggest that the RTM bidding window may be retained at a reasonable duration (e.g., 10 minutes), while proportionately reducing the timelines for other activities, without altering the overall gate closure as proposed

4. Enabling RE Generators to Buy Power in RTM

We would also like to highlight an important market design aspect.

Currently, the ability of generators to **buy power in RTM is restricted**, typically limited to cases such as forced outages. Given the inherent variability of RE generation, we request the Commission to consider **allowing RE generators to procure power from RTM for deviation management.**

This would provide the following benefits:

- **Improved compliance with schedules**, reducing DSM exposure,
- **Better grid discipline** through reduced real-time imbalances,
- Alignment with international best practices where market-based balancing mechanisms are available,
- Enhanced overall system reliability.

Notably, similar suggestions have also been raised by stakeholders in prior consultations, highlighting the need for market-based deviation management tools for RE**.**

6. Conclusion

In conclusion, we reiterate our strong support for the Hon'ble Commission's initiative to enhance the efficiency of the Real Time Market and bring scheduling closer to delivery time. This is a critical reform in the context of India's evolving energy transition.

At the same time, we request that the implementation framework adequately considers the **operational realities of renewable energy generators**, particularly regarding:

- Bidding window sufficiency, and
- Flexibility for deviation management through RTM participation.

We remain committed to supporting the Commission in developing a robust, efficient, and RE-friendly power market framework.

Thanking You,

Yours sincerely

Agam Kumar

for ReNew Private Limited

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