GSECL

GUJARAT STATE ELECTRICITY CORPORATION LIMITED

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CIN: U40100GJ1993SGC019988

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To,

The Secretary,

Central Electricity Regulatory Commission (CERC),

6th, 7th & 8th Floor, Tower-B, World Trade Centre,

Nauroji Nagar, New Delhi – 110029

Subject: Comments/Suggestions of Gujarat State Electricity Corporation Limited (GSECL) on the Discussion Paper on "Shortening the Scheduling Timeline for Real Time Markets in India" published by CERC in April 2026.

Respected Sir/Madam,

Gujarat State Electricity Corporation Limited (GSECL), a Government of Gujarat undertaking and a State GENCO operating thermal, gas, and hydro generating units with an aggregate installed capacity of over 7,000 MW, is pleased to submit its comments and suggestions on the above-referenced Discussion Paper published by the Central Electricity Regulatory Commission (CERC) in April 2026.

GSECL has carefully studied the Discussion Paper and appreciates CERC's endeavour to modernise and streamline the Real Time Market (RTM) framework in consonance with the growing penetration of Renewable Energy (RE) sources and the need for more responsive, near-real-time balancing of the grid. GSECL submits the following comments for consideration of the Commission:

1. WELCOME OF THE PROPOSED REDUCTION IN SCHEDULING TIMELINE

a) GSECL welcomes the proposal to reduce the overall scheduling timeline from the current 75 minutes to 50 minutes between the end of 'Revision of Schedule' and the commencement of the delivery time block. This is a significant and forward-looking reform that aligns India's electricity market operations with emerging international best practices.

b) The Discussion Paper correctly identifies that the 75-minute timeline was designed in 2020 to accommodate the then-existing operational and technological constraints. Over the past five years, the successful and uninterrupted operation of the RTM, the implementation of the National Open Access Registry (NOAR), and the progressive automation of market and dispatch operations have collectively created the enabling conditions for this compression of timelines.

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c) GSECL recognises and supports the following key benefits that the shortened scheduling timeline is expected to deliver:

- Improved accuracy of demand and supply forecasting: A shorter gate-closure window reduces the time horizon over which generators and DISCOMs must forecast load and generation, thereby minimising the impact of inherent forecasting errors, particularly for Variable Renewable Energy (VRE) sources such as solar and wind.
- Reduction in RE curtailment: A compressed timeline enables RE generators to better align their generation schedule with actual weather-driven output, reducing unnecessary curtailment arising from system security concerns related to high-frequency deviations.
- Minimisation of DSM penalties: Closer-to-real-time scheduling will significantly reduce the demand-supply mismatch that results in Deviation Settlement Mechanism (DSM) charges, reducing financial stress on both generators and DISCOMs. As highlighted in the Discussion Paper, multiple stakeholders have sought this relief in the context of Petition No. 9/SM/2025.
- Enhanced grid stability: A more responsive RTM will assist the system operator in maintaining the delicate real-time balance between generation and load, which is increasingly challenging given India's rapidly growing VRE penetration (installed solar and wind capacity of 140.60 GW and 54.65 GW respectively as of January 2026).
- Portfolio efficiency for generators and DISCOMs: The compressed timeline allows all market participants to adjust their positions in a manner that more accurately reflects prevailing grid conditions, improving overall portfolio efficiency.

d) GSECL also supports the proposal to reduce the RTM Gate Closure time (for the RTM auction end) to T-45 minutes before delivery (from the existing T-60 minutes), and concurs that the sequential activities of RTM clearing, SCUC/SCED optimisation, and TRAS dispatch can be accommodated within a 30-minute window given the automation now in place at Grid-India's systems.

2. CONCERN REGARDING THE PROPOSED REDUCTION IN RTM BIDDING WINDOW FROM 15 MINUTES TO 5 MINUTES

While GSECL is fully supportive of the overall objective of shortening the scheduling timeline, it has a significant operational concern with the specific proposal to reduce the RTM bidding window from the existing 15 minutes to 5 minutes. GSECL respectfully submits that a 5-minute bidding window is unduly stringent and operationally unworkable for a State GENCO of GSECL's scale and nature, for the following reasons:

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(a) Large number of individually managed portfolios on Power Exchanges

GSECL currently operates a diverse fleet of generating assets comprising thermal, gas-based, and hydro units distributed across multiple stations in the State of Gujarat. For the purposes of participation in Power Exchanges, GSECL is required to bid on each generating unit/portfolio separately. GSECL currently manages a total of 19 separate portfolios on the Power Exchange platform. Each portfolio requires individual entry of bid quantities and prices, and bids cannot be entered in bulk or through a single consolidated submission, as the ECR for each unit is different. In the existing 15-minute bidding window, GSECL's officials are able to complete this process, albeit with some effort. Compressing the bidding window to 5 minutes would make it practically impossible to enter bids for all 19 portfolios accurately within the stipulated time, leading to either missed bids or erroneous entries – both of which would adversely impact GSECL's commercial interests as well as grid balancing. This also becomes important for GENCOs due to implications of the LPSC rules, as non-offering of URS power due to missed timelines or erroneous entries will lead to deduction of fixed cost.

(b) Absence of automated bidding software at GSECL

The Discussion Paper, in paragraph 4.2, states that the 5-minute window is considered sufficient on the premise that most entities have automated bidding systems and that "with automation, bidding operations can be performed more quickly and precisely." GSECL submits that this assumption, while valid for large private sector generators and certain well-resourced DISCOMs, does not hold true uniformly across all market participants, and in particular does not apply to GSECL. GSECL currently does not possess any automated bidding software or algorithmic bidding tool that interfaces with the Power Exchange platform. All bids are entered manually by designated officials, portfolio by portfolio, based on real-time assessment of plant availability, declared capacity (DC), and market conditions. The procurement, development, integration, and testing of such automated bidding software is a time-consuming and resource-intensive exercise for a public sector undertaking, requiring compliance with procurement norms and IT security requirements. It cannot be implemented at short notice.

GSECL submits that the situation described above is likely to be shared by several other State GENCOs and smaller generators who participate in the RTM without automated systems. If the bidding window is reduced to 5 minutes, such entities would effectively be excluded from meaningful participation in the RTM, which would be contrary to the Commission's objective of deepening market participation and improving liquidity in the RTM.

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3. PRAYER AND SUGGESTIONS

In view of the above, GSECL respectfully urges the Commission to consider the following:

(a) Relax the RTM Bidding Window to 10 Minutes

GSECL requests that the RTM bidding window be set at 10 minutes (from T-50 to T-40 before delivery) instead of the proposed 5 minutes. A 10-minute window strikes a reasonable balance between the operational requirements of large multi-portfolio State GENCOs that lack automated bidding tools, and the objective of bringing gate closure closer to real time. This would allow GSECL and similarly situated entities to accurately bid all 19 portfolios manually, while still representing a significant improvement (reduction of 5 minutes) over the current 15-minute window.

(b) Transitional Arrangement and Market Readiness

GSECL requests that the Commission mandate Power Exchanges to provide technical solutions and/ or application programming interfaces (APIs) that facilitate automated bidding for State GENCOs at reasonable cost, and to provide adequate time and assistance for market participants to transition. GSECL also requests that the Commission consider whether the schedule for implementation of the shortened timeline should be phased, to allow State GENCOs sufficient time to upgrade their systems.

4. CONCLUSION

a) GSECL reiterates its full support for the Commission's initiative to shorten the scheduling timeline for Real Time Markets and acknowledges the careful and consultative approach adopted by the Commission in preparing this Discussion Paper. The proposed reforms, once implemented, will materially improve the responsiveness of India's power markets to real-time variations in demand and supply, reduce RE curtailment, and lower DSM charges for generators and DISCOMs alike.

b) However, GSECL respectfully submits that the proposed 5-minute bidding window is unduly restrictive for State GENCOs such as GSECL, which operated large multi-portfolio assets without automated bidding infrastructure. GSECL urges the Commission to set the RTM bidding window at 10 minutes, and to explore whether the overall timeline can be set at 45 minutes – contingent on Grid-India's confirmation that the downstream scheduling activities remain feasible – so as to preserve the intent of meaningful gate closure reduction.

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GSECL trusts that the Commission will give due consideration to the above submissions and is willing to provide any further information or clarifications that the Commission may require.

Thanking you,

With regards,

Yours Faithfully,

Shubhadeep Sen
General Manager (F&A) & CFO

Copy f.w.c.s.to:-

1. MD, GSECL