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Ref. No. CE/PP/ No 18544 **DATE:** 27 MAY 2026

To,
The Secretary,
Central Electricity Regulatory Commission,
World Trade Centre,
6th,7th and 8th Floor, Tower-B,
Nauroji Nagar, New Delhi-110029
Email: secy@cercind.gov.in, Mahesh.khichar@cercind.gov.in

Sub: Submission of comments on the Draft Staff Paper on "Shortening the Scheduling Timeline for Real Time Markets (RTM) in India" issued by the Hon'ble Commission

Ref: 1) RA-14026(12)/1/2026-CERC Dated: 06.05.2026

Respected Sir,

This has reference to the Draft Staff Paper on "Shortening the Scheduling Timeline for Real Time Markets (RTM) in India" issued by the Hon'ble Commission for stakeholder consultation, MSEDCL respectfully submits the following comments and concerns for kind consideration of the Hon'ble Commission.

At the outset, MSEDCL appreciates the efforts of the Hon'ble Commission towards improving real-time balancing efficiency, facilitating closer-to-delivery scheduling, enhancing renewable energy integration, reducing Renewable Energy (RE) curtailment, and minimizing DSM exposure through optimization of Real Time Market operations. The proposed framework is a progressive step towards strengthening the evolving power market ecosystem in India, particularly in view of increasing renewable energy penetration and growing operational complexity of grid management.

However, MSEDCL is of the view that the proposed reduction in the RTM bidding window from 15 minutes to 5 minutes and reduction in the overall scheduling timeline from 75 minutes to 50 minutes may create operational challenges considering the varying levels of automation readiness, system preparedness, and coordination requirements among stakeholders. The compressed timelines may adversely impact demand assessment, portfolio optimization, internal approvals, and bidding operations of DISCOMs, particularly during contingencies and rapidly changing demand conditions. In this regard, it is submitted that instead of reducing the RTM bidding window to 5 minutes, the existing bid clearing duration of 15 minutes may be reduced to 10 minutes after implementation of Market Coupling, as centralized bid aggregation, market clearing, and scheduling would be undertaken by Grid Controller of India Limited acting as the Market Coupling Operator (MCO).

Further, the framework would require robust automation systems and reliable contingency mechanisms to avoid operational risks, RTM session failures, and grid security concerns. MSEDCL therefore requests that the proposed framework may be implemented in a phased and gradual manner with adequate pilot testing, system readiness assessment, operational safeguards, and stakeholder preparedness before nationwide implementation. Detailed comments and suggestions are enclosed as Annexure-A separately for kind consideration.

MSEDCL respectfully requests the Hon'ble Commission to kindly consider the enclosed submissions while finalizing the revised RTM framework.

Thanking You.

Yours faithfully,

Chief Engineer (Power Purchase)
MSEDCL

Copy s.w.r.to,

1. **Director (Commercial), MSEDCL.**
2. **Executive Director (Commercial), MSEDCL.**

Annexure-A

Paper Para Ref.	Issue / Observation	Comments / Suggestions	Rationale
Para 4.1 & 4.2	Phased and Gradual Implementation of Reduced RTM Timeline	The proposed reduction in the RTM bidding window from 15 minutes to 5 minutes and reduction in overall scheduling timeline from 75 minutes to 50 minutes may be implemented in a phased manner through pilot implementation, shadow testing exercises, mock scheduling runs, and gradual migration before nationwide rollout. Further, instead of immediate reduction to a 5-minute bidding window, an intermediate transition to a 10-minute bidding window may initially be considered until systems and processes stabilize.	Automation readiness, digital infrastructure, and operational preparedness presently vary significantly across utilities and stakeholders. A phased approach would help utilities undertake system upgrades, testing, software integration, manpower training, and operational stabilization before migration to compressed timelines.
Para 4.2	Inadequate RTM Bidding Window for DISCOM Operations	The proposed reduction of the RTM bidding window from 15 minutes to 5 minutes may be reconsidered, and a minimum 10-minute bidding window may be retained for bid submission and operational assessment by market participants. Instead, the bid clearing time of 15 minutes may be reduced to 10 minutes after implementation of Market Coupling, as centralized bid aggregation, market clearing, and scheduling would be undertaken by Grid Controller of India Limited acting as the Market Coupling Operator (MCO).	DISCOMs require adequate time for demand assessment, portfolio optimization, internal approvals, market analysis, and bid strategy formulation. Electricity demand varies dynamically due to weather conditions, agricultural load, industrial demand, festivals, outages, and unforeseen contingencies. A very short bidding window may adversely affect prudent procurement decisions and increase operational and financial risks.
Para 5	RTM Session Aborts and Market Failures	Suitable accountability mechanisms, contingency procedures, compensation frameworks, and relief measures may be introduced for RTM session aborts and failures. Further, affected participants may be provided appropriate relief such as waiver/reduction of trading margin charges or DSM relaxation in case of aborted sessions.	DISCOMs have experienced RTM session failures and aborted sessions lasting from 30 minutes to 2 hours. In such situations, utilities are deprived of balancing opportunities and are exposed to DSM liabilities without any fault on their part. Under compressed timelines, the operational impact of such failures may become more severe.