Comments on CERC Staff Paper on Shortening the Scheduling Timeline for Real Time Markets in India

- The intent of the draft proposal of CERC to reduce the scheduling timeline **from 75 minutes to 50 minutes** is based on aligning with evolving market dynamics, increasing renewable penetration & enhanced automation capabilities in the Indian power sector.

- The objective of improving grid responsiveness is appreciated, however, the implementation framework must adequately **consider operational realities faced by generating companies, DISCOMs, power traders & system operators to ensure smooth market functioning without compromising reliability & market efficiency. In this regard, we submit our concerns & suggestions as follows:**

  a. RTM Bidding Window of 5 Minutes may be Operationally Challenging

  - CERC has proposed reducing the **RTM bidding window from the existing 15 minutes to 5 minutes.** While automation has improved significantly, **a 5-minute window may be inadequate for practical operational requirements, especially for generators having multiple beneficiaries across different regions & control areas, which are as follows:**

    - Generators are **fully dependent on the revised schedules** received across different regions & control areas from different buyers/ beneficiaries for preparation of their final RTM strategy; **Henceforth, consolidation & reconciliation of schedules across RLDCs/SLDCs require sufficient operational time.**

    - **Moreover, Thermal generators need adequate assessment of technical constraints such as ramping capability, fuel optimization, reserve margins & unit loading before bid submission.**

  - The Honourable CERC is requested to re-consider the operational & technical constraints faced by generators while proposing the shortening of scheduling timelines for RTM in India & **should retain the bidding window of 15 minutes as it is as per the existing framework or should provide the bidding window framework for 10 minutes instead of restricting to 5 minutes**.

  b. NOC / Transmission Margin Availability should be finalized prior to opening of RTM Bidding Window

  - Successful placement & acceptance of RTM bids depend upon the availability of transmission corridor margins & NOC approvals.

MB Power (Madhya Pradesh) Limited

Comments on CERC Staff Paper on Shortening the Scheduling Timeline for Real Time Markets in India

- Under the current mechanism, the transmission margins or NOC availability are updated during the last few minutes of the bidding window, which poses significant risk of bid rejection & uncertainty in market participation resulting in in-efficient market outcomes.

- For mitigation of above such risks, CERC may direct Grid India & Power Exchanges to ensure stable & synchronized transmission margin visibility on upfront basis so that the NOC availability should be fetched & communicated before commencement of the RTM bidding window.

MB Power (Madhya Pradesh) Limited