Date: 29.05.2026

To
The Secretary
Central Electricity Regulatory Commission
6th, 7th & 8th Floor, Tower B,
World Trade Centre, Nauroji Nagar,
New Delhi – 110029
Email: secy@cercind.gov.in; skchatterjee@cercind.gov.in

Sub: Comments of Hindustan Power Exchange Limited ("HPX") on the CERC Staff Paper titled "Shortening the Scheduling Timeline for Real Time Markets in India"

Dear Sir,

This has reference to the Public Notice dated 06.05.2026 issued by the Hon'ble Commission inviting comments and suggestions from stakeholders on the Staff Paper titled "Shortening the Scheduling Timeline for Real Time Markets in India".

Accordingly, the detailed comments of HPX are enclosed herewith as **Annexure-I**.

HPX remains committed to support the Hon'ble Commission and all stakeholders contributing towards power market framework in India.

Yours sincerely,

For Hindustan Power Exchange Limited

(Harish Saran)

Managing Director

Enclosure: A/a

Annexure-I

HPX Comments on the CERC Staff Paper on

"Shortening the scheduling Timeline for Real Time Markets in India"

1. With reference to public notice dated 06.05.2026, the CERC, through its staff paper on "Shortening the scheduling Timeline for Real Time Markets in India", proposed to reduce the timeline between the end of 'Revision of Schedule' and actual delivery of power from the existing 75 minutes to 50 minutes. It will be certainly useful in matching the electricity demand and supply more accurately, minimizing the forecasting errors in the real-time market and reducing renewable energy curtailment. The CERC proposed the new timeline for Real Time Market (RTM) providing the justification as under:

    a. The existing framework provides a 15-minute window for bidding in the RTM market. Operational experience shows that the five-minute window is sufficient to place bids in the RTM. Accordingly, CERC proposed to reduce the RTM bidding window from the existing 15 minutes to 5 minutes.

    b. In the existing framework, the system operator has 45 minutes after RTM clearing time block to perform various activities before power delivery commences. With the successful implementation of NOAR and the required automation in place for running SCUC, SCED, and AS clearing, Grid-India performing these activities effectively with minimal manual intervention. It seems feasible to complete these activities within 30 minutes by merging the activities. Accordingly, CERC proposed to reduce timeline from 45 minutes to 30 minutes to perform various activities by the system operator.

2. HPX highly appreciates the CERC proposal on shortening the scheduling timeline for RTM. This will certainly enable better forecasting/scheduling of intermittent sources such as wind and solar and would be beneficial for managing discoms' portfolios to avoid DSM charges in the long run.

3. HPX has no issues with the new bidding timelines for RTM, however, the market participants (particularly trading members with limited staff) who are bidding on power exchanges for number of contracts may be having issues with the new bidding timelines for RTM.