RP - Sanjiv Goenka Group
Growing Legacies

CESC LIMITED
Energising Lives · Since 1899

CORP:SERV : 2679

28 May 2026

The Secretary,
Central Electricity Regulatory Commission
6th, 7th & 8th Floors, Tower B
World Trade Centre
Nauroji Nagar
New Delhi – 110029

Sir,

Subject: Comments on CERC Staff Paper on "Shortening the scheduling Timeline for Real Time Markets in India"

We write in reference to the notice No RA-14026(12)/1/2026-CERC dated 06.05.2026 in the matter relating to the Staff Paper on "Shortening the scheduling Timeline for Real Time Markets in India". At the outset we appreciate the initiative of the Hon'ble Commission towards reducing the scheduling timeline for the Real Time Market (RTM) and bringing market operations closer to actual delivery. The proposed framework is expected to improve demand-supply balancing, facilitate better renewable energy integration, and reduce DSM exposure over the long term.

The company supports the broader objective of enabling DISCOMs and generators to fine-tune their power procurement/sale portfolio closer to real time. However, the following concerns and suggestions may kindly be considered before implementation of the proposed framework.

1. Reduction of RTM Bidding Window from 15 Minutes to 5 Minutes

The Discussion Paper proposes reduction of the RTM bidding window from the existing 15 minutes to 5 minutes, considering the advancement in automation and operational systems.

While automation has certainly improved market operations, the proposed reduction may pose operational challenges for several market participants, particularly

distribution licensees who undertake multiple internal validation and approval processes before bid placement. In practical scenarios, the bidding process involves assessment of demand forecast revisions, generation availability, transmission constraints, market price signals, and DSM implications, all within a very limited timeframe.

Further, any bid failure, communication issue, system latency, or last-minute data mismatch within a compressed 5-minute window may expose DISCOMs to avoidable DSM risks and operational inefficiencies.

Accordingly, it is suggested that the Commission may consider a phased approach towards reduction of the bidding window. As an intermediate step, the bidding window may initially be reduced from 15 minutes to 10 minutes instead of directly reducing it to 5 minutes. This would provide sufficient transition time for DISCOMs and generators to streamline their internal operational processes and strengthen automation systems for seamless participation in the RTM.

A gradual reduction would also minimise the probability of bid failures and associated DSM exposure during the transition phase, while still achieving the objective of shortening the scheduling timeline.

2. Delivery Period in RTM to be Aligned with 15-Minute Time Blocks

At present, RTM transactions are effectively scheduled for a 30-minute delivery period, requiring the same bid quantity to be maintained for two consecutive 15-minute time blocks.

Considering the increasing variability in demand patterns and renewable energy generation, particularly over shorter intervals, it is desirable that market participants be provided flexibility to place bids separately for each 15-minute time block, similar to the framework already available in DAM/GDAM/HPDAM segments.

Allowing distinct bids for each 15-minute delivery block would enable DISCOMs and generators to optimise their power procurement and sale portfolio more accurately in line with actual system requirements. Such flexibility would improve real-time

balancing efficiency, reduce dependence on deviations, and help minimise DSM exposure.

The proposed change would also be aligned with the broader objective of bringing market operations closer to real-time system conditions and facilitating better integration of variable renewable energy sources.

Accordingly, it is requested that the Commission may consider enabling separate bidding and scheduling for each 15-minute delivery block in RTM instead of maintaining a common bid for a 30-minute delivery period.

We again appreciate the efforts of the Hon'ble Commission towards improving operational efficiency and responsiveness of the real-time electricity market framework. The above suggestions are submitted for kind consideration to ensure smooth implementation, operational reliability, and effective participation of all stakeholders in the evolving market framework.

Yours faithfully

Head – Regulatory