Comments on Staff Paper on "Shortening the scheduling Timeline for RTM in India

Sr. No.	Clause No. and Existing Provision	Suggested text for the amendment	Rationale for Clarifications / Amendment
1)	**Section 4.3,** 6th Line "Accordingly, it is proposed that the above revision period end **50 Minute** before the start of the Delivery time Block, rather than current 75 Minutes."	• Accordingly, it is proposed that the above revision period end **60 Minute** before the start of the Delivery time Block, rather than current 75 Minutes.	Post Gate Closure, the proposed schedule revision timeline of 5 minutes appears operationally challenging for effective participation by both Buyers and Sellers in the Real Time Market (RTM) particularly for updating schedule revisions and preparation of Bids. For Instance, a) **Generator's Perspective:** Suppose an inter-state generator supplying power to multiple beneficiaries.The generator is required to first download the revised schedules (upward or downward revisions) requisitioned by beneficiaries from WBES, which itself may consume around 2-3 minutes. Thereafter, preparation of various bids such as RTM bids (including multiple bids in view of Electricity LPS Rules), TRAS bids, etc. may require an additional 1-2 minutes. Further, submission of bids either directly or through a nominated Power Trader involves additional coordination and communication timelines, which may take another 3-4 minutes. Accordingly, the overall operational process generally requires 10-15 minutes under normal conditions. b) **Trader's Perspective:** The proposed 5-minute timeline post Gate Closure would pose significant operational challenges, as traders are required to collate bids from multiple Buyers and Sellers either through an internally developed web portal or in few cases, through manual coordination due to internet connectivity and communication constraints. Further, client confirmations and submission of bids within such a short duration may adversely affect effective participation in RTM/TRAS and overall market efficiency. In view of the above, the proposed additional 10-minute time for schedule revision by Generators and bid revision/collection by Sellers/Traders would help ensure proper updating of revised schedules and facilitate effective bid preparation and collection, while also accounting for risks associated with internet connectivity and communication constraints. Further Bid placing and other timelines remains same as proposed in Staff Paper.