ALL INDIA DISCOMs ASSOCIATION

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Save Energy!
Save Nation!!

No. RA-11/AIDA-2026 Dated: June 1, 2026

To,

Secretary
Central Electricity Regulatory Commission (CERC)
8th Floor, Tower-B, World Trade Centre,
Nauroji Nagar
New Delhi – 110029

(Email: secy@cercind.gov.in)

Sub: All India Discoms Association (AIDA)'s comments on CERC Staff Paper on "Shortening the scheduling Timeline for Real Time Markets (RTM) in India"

Ref: No. RA-14026(12)/1/2026-CERC dated 6th May 2026

Dear Sir,

Greetings from All India Discoms Association (AIDA)!

2. We have carefully gone through the proposals contained in the communication issued by the Hon'ble Commission dated 6th May, 2026. AIDA submits the following submissions/ comments in this regard for consideration of the Hon'ble Commission:

Sr. No.	Order Para Reference	Issue / Observation	AIDA Comments/ Suggestions	Rationale
1	4.2	Automation and System Readiness (Reduction in RTM Bidding Window from 15 Minutes to 5 Minutes)	It is suggested that pilot implementation or shadow testing exercises may be conducted prior to nationwide implementation. Further, sector-wide readiness assessment may also be undertaken to evaluate the level of automation and operational preparedness of all stakeholders, including DISCOMs, SLDCs, RLDCs, generators, and market operators	Automation readiness presently varies significantly across utilities. Pilot implementation and readiness assessment would help identify operational gaps and facilitate smoother transition to shorter scheduling timelines. Uniform technological preparedness across all stakeholders would be essential to avoid operational disruptions, scheduling mismatches, and communication

			through extensive mock drills and trial operations.	failures under compressed timelines.
2	4.2	Phased Reduction in RTM Bidding Window	Instead of immediate reduction of the RTM bidding window from 15 minutes to 5 minutes, an intermediate transition to 10 minutes may initially be considered, followed by further reduction after stabilization of systems and operational processes.	A phased implementation approach would provide adequate time for utilities, exchanges, and system operators to undertake system upgrades, testing, and process stabilization before migration to a 5-minute bidding window.
3	5	Proposal for transition from half-hourly RTM to 15-minute block RTM market.	It is proposed to modify the RTM framework from the current structure of 48 sessions (each covering 15-minute bidding and half-hourly delivery) to 96 sessions per day (each covering 15-minute bidding and 15-minute delivery)	At present, although scheduling happens in 15-minute blocks, trading decisions are taken for 30 minutes (two blocks together), which limits flexibility. Moving to single-block trading will allow Discoms to bid closer to real-time for each block, improving demand & supply response. This will help reduce DSM exposure and provide better control over short-term variability such as increasing renewable penetration, sudden plant outages & unforeseen conditions (System Outages, Thunderstorms, Hailstorms, Gusty winds etc.)

Additional Suggestions:

1. It is suggested that Power Exchanges, SLDCs, and RLDCs may be encouraged to develop and provide integrated automated systems along with API-based interfaces to facilitate faster scheduling, bidding, and coordination activities under compressed timelines. It is observed that the existing scheduling optimization process still involves significant manual intervention and coordination among various stakeholders. Therefore, enhanced automation, seamless system integration, and real-time data exchange mechanisms would be critical for ensuring efficient, reliable, and error-free market participation under shorter RTM scheduling timelines.

2. It is suggested that suitable accountability and compensation mechanisms may be introduced for RTM session aborts and failures. In cases of aborted RTM sessions, Power Exchanges may be made accountable and affected participants may be provided appropriate relief, such as waiver or reduction of trading margin charges for cancelled bids.

   Further, it is observed that RTM sessions are getting aborted for durations ranging from 30 minutes up to 2 hours. In such session failures expose DISCOMs to DSM liabilities without any fault on their part, as they are left without any alternate market mechanism to manage shortfall or surplus. Since RTM has been operational for more than five years, robust automation systems, contingency mechanisms, and clear SOPs may now be developed to address such issues effectively.

3. It is suggested that Open Access consumers embedded within DISCOM systems may not be permitted to participate in RTM under reduced scheduling timelines. The uncertain and dynamic drawl pattern of such consumers creates scheduling uncertainty and imposes additional DSM burden on DISCOMs. Further, with compressed RTM timelines, DISCOMs may have very limited opportunity to revise schedules and effectively manage deviations arising from sudden changes in drawl by embedded Open Access consumers.

Yours sincerely,



(Satyendra Nath Kalita)
Director (Policy & Regulatory Affairs), AIDA