West Bengal State Electricity Distribution Company Limited
(A Government of West Bengal Enterprise)
Office of the Chief Engineer : Regulation Cell
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Memo No. REG/CERC/72 **Dated:** 26.05.2026

To
The Secretary, CERC,
6th ,7th & 8th Floors, Tower B, World Trade Centre,
Nauroji Nagar,
New Delhi-110029

Sub: Comments/suggestions of WBSEDCL on the Central Electricity Regulatory Commission Staff Paper on "Shortening the scheduling Timeline for Real Time Markets in India".

Ref: Public Notice under Memo No. RA-14026(12)/1/2026-CERC dated 06.05.2026 of CERC.

Sir,

With reference to above comments/suggestions of WBSEDCL on the Central Electricity Regulatory Commission Staff Paper on "Shortening the scheduling Timeline for Real Time Markets in India" is attached for your consideration, please.

Enclo: As stated

for 26.5.26.

Chief Engineer (Regulation)

Comments/Suggestions of WBSEDCL on CERC Staff Paper on "Shortening the scheduling Timeline for Real Time Markets in India"

Ref: No. RA-14026(12)/1/2026-CERC Dated: 06.05.2026

With reference to the above Discussion Paper, WBSEDCL submit the following comments for consideration of the Commission.

The proposal to compress the Revision of Schedule timeline to T−50 is acknowledged and may be accepted as an immediate procedural measure. However, the consequential reduction of the RTM bidding window to only five minutes, namely from T−50 to T−45, presents significant operational limitations and may not be practically workable under prevailing scheduling arrangements.

RTM participation is not a standalone activity but the final stage of a mandatory sequential process. Prior to bid placement, revised schedules are first issued by the RLDC (through WBES system), followed by intrastate schedule redistribution by the SLDC (through SAMAST system), after which the DISCOM assesses the prevailing surplus or deficit position and formulates the bidding requirement. Since each stage is dependent on completion of the preceding activity, the process is inherently sequential and cannot be compressed beyond certain operational limits. Based on practical experience, publication of revised schedules in the WBES system of RLDC itself occurs only a few minutes after schedule closure. **Consequently, a five-minute bidding window leaves negligible usable time for meaningful assessment and informed bid placement by the DISCOMs. Even a minor delay at any intermediate stage may substantially impair participation in the RTM session and expose the buying entity to avoidable DSM liability arising from circumstances beyond its operational control.**

In view of the above, it is proposed that, as an immediate measure, the RTM bidding window be retained from T−50 to T−40, with gate closure at T−40. Such an arrangement would still materially advance the present timeline while preserving sufficient operational headroom for the mandatory RLDC→SLDC→DISCOM scheduling cascade to be completed within practical latency constraints. Importantly, this approach can be implemented without requiring major technological intervention or process redesign.

Further, attention is invited to the reference to "T−60" appearing in Table-2 (Block X-4) of the Discussion Paper, which appears inconsistent with the proposed T−45 gate closure discussed in Sections 4.2 and 5.1(i), as well as illustrated in Figure-4 and Figure-5. The same may kindly be reviewed and corrected for consistency.

Subir Roy
Addl. Chief Engineer
Regulation Department
W.B.S.E.D.C.L