JHABUA POWER

Ref No. JPL/BD/CERC/2026/01

27.05.2026

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

Sub: Jhabua Power Ltd's comments on Staff Paper on Shortening the scheduling Timeline for Real Time Markets in India.

Ref: Staff Paper on Shortening the scheduling Timeline for Real Time Markets in India.

Dear Sir,

Please find attached comments on Staff Paper on Shortening the scheduling Timeline for Real Time Markets in India for kind consideration of Hon'ble Commission.

Thanking You,
Yours faithfully,

27/5/26

Vinod Kumar Jain
AGM-Commercial
Jhabua Power Ltd- JV of NTPC Ltd

JHABUA POWER

Jhabua Power Ltd (JPL)
Comments on Discussion Paper on Shortening the scheduling Timeline for Real Time Markets in India

Please find herewith Jhabua Power Ltd's (JPL) comments on Discussion Paper on Shortening the scheduling Timeline for Real Time Markets in India:

Clause No	Proposed Amendment by Commission	Proposed changes/ Suggestions/ observations	Rationale
5.1 (i) Block X-4 (T-50 to T-45)- bidding window for RTM	Under the proposed RTM timeline, all entities would be given 5 minutes for bidding, as it is felt that with automation, bidding operations can be performed more quickly and precisely, and a 5-minute window would be sufficient to complete the tasks. The window for trade shall open from 23.10 hrs to 23.15 hrs of (D-1, considering D as the delivery day), for the delivery of power for the first two time blocks of 1st hour of day (D), i.e., 00.00 hrs to 00.30 hrs, and will be repeated thereafter	It is suggested not to change the RTM Bidding timeline and maintain the 15 minute window as is currently existing. The relevant clause to be revised as follows: ".....Under the proposed RTM timeline, all entities would be given **15 minutes** for bidding....."	Explained below

Rationale for not reducing RTM Bidding window timeline:

Multiple beneficiaries and non-automated systems:

Many generating stations have combination of power tie-ups under Sec-62 as well as Sec-63 with multiple beneficiaries. Shortening of RTM timeline will result into following issues:

(a) Each beneficiary has independent right to revise and punch schedules on the web-based scheduling portal. Consequently, beneficiaries may submit revised schedules at the last minute and post such revision, same shall be reflected at WBES Portal. Further, any quantum not requisitioned by beneficiaries has to be placed in DAM/RTM as per LPS rules, 2024. In such situations, the generator gets very limited time (only approx. 2 minutes after gate closure and SG updation on WBES portal) to assess the available Un-Requisitioned Surplus (URS) power and place bids on the Power Exchange in the RTM segment. Kindly, refer the following scenario wherein impact of reducing the timeline is reflected:

Jhabua Power Limited
(A Joint Venture of NTPC Limited)
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Corporate Office : EOC Building, 3rd Floor, Plot No. A-8A, Sector 24, Block A, Noida Uttar Pradesh 201301
Registered Office: Infinity IT Lagoon, 10th Floor, Block: EP & GP Office No: 1001 & 1002, Sector-V, Salt Lake Kolkata WB 700091
Site Office : Village Barela, Post Office-Attaria, Tehsil-Ghansore, District Seoni-480997, Madhya Pradesh

	RTM auctions start time	RTM Auction end time	RTM clearing Interval and publication on the website	Final schedule Preparation & Communication of schedule to NRLDC/RLDC/SLDC	Final schedule Preparation	Preparation time for despatch	Delivery Period
Current Timeline for RTM	22:45	23:00	23:00-23:15	23:15 - 23:30	23:30 - 23:45	23:45 - 24:00	00:00 - 00:30

Gate Closure for schedule revision takes place at 22:45.

In present case, if LTA/MTOA Beneficiary revises schedule before Gate closure at 22:45 (for delivery 00:00-00:30Hrs), then updated Schedule on WBES is reflected at around 22:48 hrs. It has been observed that there is generally a lag of 3 minutes before revised schedule is reflected at WBES. In existing scenario, generator still has sufficient time available to assess such schedule revisions & place the bid accordingly.

Proposed Timeline for RTM scheduling	23:10	23:15	23:15-23:30	23:30 - 23:45	23:45 to 24:00	00:00 - 00:30

Gate Closure for schedule revision takes place at 23:10.

In the revised scenario, if LTA/MTOA Beneficiary revises schedule before gate closure takes place at 23:10 (for delivery 00:00-00:30Hrs), then updated schedule on WBES is reflected at around 23:13 hrs. Thus, generators will get only 2 minutes to place the bid.

Due to reduction in timeline, there can be situation(s) where bids are placed by generators before WBES Portal is updated and this can lead to placing of excess bids (where SG exceeds DC) and consequent levy of substantial DSM penalties. This will in-turn jeopardise the grid security as well.

(b) Further, not all generators are using automated software for placing the bids. Manual bid placing can be more time taking due to multiplicity of beneficiaries or due to technical glitches while placing the bids. Also, such URS power bids are required to be placed separately for each beneficiary under their respective portfolio created by the Power Exchanges. This arrangement is necessary to ensure that the URS power offered in the market correctly reflects the actual beneficiary-wise position and enables appropriate recovery of fixed charges at the billed rate. **Reduction of RTM bid submission window can lead to situations where generators are often unable to complete the beneficiary-wise URS assessment and preparation/ submission of bids within the stipulated timeline. As a result, generators maybe unable to participate effectively in the RTM, leading to loss of opportunity for optimal sale of surplus power, inefficient market participation, and possible under-recovery of fixed charges.**

(c) Further, as on date, for many IPPs having Merchant Capacity, even the station Ramp rate is not linked for each beneficiary and IPPs are managing under/Over-Injection by placing the bids through RTM to avoid such over/under injection. Hon'ble Commission is requested to direct the system operator to align the scheduling software to cater to the requirement of all the combinations of contracts/Merchant plants before implementation of new timelines of RTM bidding proposed in the staff paper.

(d) Also, different SLDCs are involved in the process for inter-regional power transfer/exchange and in the real time, significant time is lost whenever there is any Unit tripping/Emergency and in such situations, any further reduction in bidding timeline from present 15 min to 5 min may lead to increase in disputes and will result into financial loss to generators. The situation becomes complex for Merchant plants having multiple tie-up across various regions throughout the country.

Keeping all of the above in view and time required to resolve the said issues, it is proposed to maintain the 15 minute window for placing the bids.

