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Incorporated under the Companies Act, 1956
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KSEBL/TRAC/ CG/ RTM Market/2026-27/ Dated: 27/05/2026

To
The Secretary,
Central Electricity Regulatory Commission
New Delhi

Sub: Comments of Kerala State Electricity Board Limited (KSEBL) on the Staff Paper titled "Shortening the Scheduling Timeline for Real Time Markets in India" – reg.

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

Sir,

Kerala State Electricity Board Limited (KSEBL) hereby submits its comments on the Staff Paper on "Shortening the Scheduling Timeline for Real Time Markets in India" issued by the Hon'ble Commission.

At the outset, KSEBL appreciates the initiative of the Hon'ble Commission in proposing reforms to the Real Time Market (RTM) framework considering the increasing renewable energy penetration and the evolving operational requirements of the Indian power system. The proposal to reduce the timeline between revision of schedule and actual delivery of power from 75 minutes to 50 minutes is a progressive step towards improving real-time balancing efficiency and enhancing market responsiveness.

KSEBL agrees with the observations made in the Staff Paper that the increasing share of variable renewable energy sources such as solar and wind necessitates scheduling and balancing mechanisms closer to real-time operation. The proposed framework is

expected to improve forecasting accuracy, facilitate better portfolio optimization by distribution utilities, reduce renewable energy curtailment and minimize DSM liabilities arising due to forecasting errors and rapid demand-supply variations.

The proposed reduction in scheduling timeline would particularly benefit utilities in managing sudden variations in demand and renewable generation, especially during peak load periods and changing weather conditions. The proposal is also expected to improve market efficiency by enabling participants to undertake balancing actions closer to the delivery period.

KSEBL further appreciates the efforts undertaken by the Hon'ble Commission and Grid-India in leveraging advancements in automation, National Open Access Registry (NOAR), scheduling platforms and real-time communication systems for enabling faster market operations and schedule processing. The successful operation of RTM over the last several years demonstrates the maturity and robustness of the Indian power market framework.

KSEBL supports the proposal to shorten the schedule revision timeline and RTM gate closure timeline, subject to ensuring adequate operational preparedness and system security. Since the proposed framework involves compression of several critical operational activities including RTM clearing, congestion assessment, SCUC, SCED and ancillary services optimization, it is essential that adequate testing and validation are undertaken prior to implementation.

In this regard, KSEBL submits that detailed mock exercises and pilot runs may be conducted by Grid-India in coordination with RLDCs, SLDCs, Power Exchanges and utilities to ensure seamless implementation of the revised framework. Adequate redundancy and cyber-security measures may also be ensured considering the increased dependence on automated scheduling and communication systems.

KSEBL further requests the Hon'ble Commission to issue detailed operational guidelines under the revised scheduling framework.

KSEBL also submits that harmonization of the proposed scheduling timeline with DSM Regulations, Ancillary Services Regulations and renewable forecasting and scheduling mechanisms would be essential for ensuring effective implementation and operational clarity.

Subject to the above observations, KSEBL supports the proposed framework for shortening the scheduling timeline for Real Time Markets in India and appreciates the efforts of the Hon'ble Commission towards strengthening grid flexibility, improving renewable integration and enhancing real-time market efficiency.

This is submitted for kind consideration of the Hon'ble Commission.

Yours faithfully,



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