Ref No.: IEX/RA/040/26-27

6th November, 2026

To,
The Secretary,
Central Electricity Regulatory Commission,
3rd & 4th Floor, Chanderlok Building, 36 Janpath,
New Delhi – 110001

Sub: Comments of Proposal in Petition No. 13/SM/2026 for inclusion of Pumped Storage Plants (PSPs) as an eligible category in the High Price Day Ahead Market (HP-DAM)

Dear Sir,

This has reference to the Hon'ble Commission's Order dated 28.10.2026 in Petition No. 13/SM/2026 seeking comments on the subject matter. At the outset, IEX welcomes the proposal to include Pumped Storage Plants (PSPs) as an eligible category in the High Price Day Ahead Market (HP-DAM). The proposed inclusion is consistent with Paragraph 3.4(iii) of the Ministry of Power's Guidelines dated 10.04.2023, which provides for participation of PSPs in all market segments, including HP-DAM.

It is submitted that enabling PSPs to participate in HP-DAM would broaden the eligible supply base and could enhance market liquidity in the HP-DAM. Such participation would also provide PSPs with an additional avenue to sell power thereby supporting their despatch. Further, PSPs can absorb surplus energy available during solar hours and supply power during supply-constrained evening hours. Their participation would, therefore, support system flexibility and help alleviate supply constraints during periods of high demand.

In view of the foregoing, it is requested that the Hon'ble Commission may consider favourably the proposed inclusion of PSPs as an eligible entity in HP-DAM.

Thanking you,

Yours Sincerely

Gaurav Maheshwari
Vice President – Regulatory Affairs