



JINDAL INDIA RENEWABLE ENERGY

Promoted by BC Jindal Group

JINDAL INDIA RENEWABLE ENERGY LIMITED

REGD. OFF: HABITAT INDIA, C-3, QUTAB INSTITUTIONAL AREA,

KATWARIA SARAI, NEW DELHI- 110016

CIN NO. U74110DL2015PLC276224

Ref: JIREL/BD&RA/Secretary/CERC/1SM26/FY 27/01

Date: 06.04.2026

To,
Secretary,
Central Electricity Regulatory Commission
6th, 7th & 8th Floors, Tower B, World Trade Centre,
Nauroji Nagar, New Delhi- 110029.

Sub: comments on CERC petition no 1/SM/2026 for determination of Rate of Congestion charge in real-time operation in inter-state transmission of electricity.

Ref:

1. CERC's proposal under petition no 1/SM/2026 dated 13.03.2026.

Respected Sir,

We would like to introduce 'Jindal India Renewable Energy Limited' (JIREL), Renewable energy arm of B.C. Jindal Group. JIREL is an Independent Power Producer (IPP) primarily focusing on investment in developing the generating capacities based on new technologies and methods involving combined generation of wind and solar power and other emerging technologies like Battery storage system.

CERC vide above referred order dated 13.03.2026 has invited comments from stakeholders on proposal of determination of Rate of Congestion charge in real-time operation in inter-state transmission of electricity under Central Electricity Regulatory Commission (Measures to relieve congestion in real time operation) Regulations, 2009.

India's renewable energy (RE) sector is rapidly expanding, and with higher RE penetration, deviations from scheduled generation become a critical issue for grid stability and market efficiency.

In view of above, the comments/suggestions/objections on the draft order are detailed hereunder. We humbly request the Hon'ble Commission to take into consideration the below comments/suggestions/objections while finalising the order.

Yours faithfully,
For Jindal India Renewable Energy Limited



Authorised Signatory

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Comments on CERC order dated 13.03.2026 on determination of Rate of Congestion charge in real-time operation in inter-state transmission of electricity.

S. No	Existing Provision in Order in 1/SM/2026	Remarks	Request from Hon'ble Commission
1	We have considered the representations received from the ASOCHAM and NGEL, praying to exempt RE sources from the congestion charge. We are of the view that congestion is an issue of grid security, and all entities must act to reduce it. With largescale RE integration, RE sources cannot be exempted from the congestion charge. The Congestion Charge mechanism, as prescribed under the CERC (Measures to Relieve Congestion in Real Time Operation) Regulations, 2009, is designed to ensure equitable and efficient use of the transmission network under constrained conditions. Congestion charges are a system operation tool aimed at maintaining grid reliability, and security and discouraging injection or drawal beyond the available transmission capability. The applicability of such charges to all entities, including RE generators, ensures non-discriminatory treatment and uniform accountability for actions that contribute to congestion, regardless of the source of generation.	The Commission's observation that "RE sources cannot be exempted from the congestion charge" does not adequately account for the inherent operational characteristics of RE generation. Unlike conventional generating stations, renewable energy plants do not possess instantaneous ramp-down capability for congestion mitigation. The deviation from schedule is beyond the reasonable control of the RE generators because of limited availability of whether data based on which forecast of generation is being done. At present whether data is being collected from stations of India Metrological Department which are less in numbers hence accuracy of generation forecast is limited. The CEA wide 07.07.2025 has issued Guidelines for Automatic Weather Stations (AWS) for Solar and Wind Power Plants with objective of Measurement of critical meteorological parameters for accurate, real-time	The Applicability of rate congestion charges shall be deferred for 3-4 years, till the time accuracy of whether data improved.



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		measurement of weather to enable optimization of RE generation. This guideline stipulates for one AWS at each RE generating station of 50 MW and above, this guideline will increase data collection points leading to accurate weather forecast for optimised and grid resilient generation from RE plants. The CEA guideline is in implementation phase and the effective and efficient implementation of this will take at least 3-4 years.	
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