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Date: Mon, 06 Apr 2026 12:43:26 +0530

Subject: Submission of Comments on Draft Order in Petition No. 1/SM/2026

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Dear Sir,

Greetings from Resolven!

Resolven (Formerly Zelestra) is a next-generation vertically integrated, multi-technology Indian renewable energy platform with a ~5.5 GW pipeline and a strategic ambition to deliver 10 GW of high-quality renewable assets by 2030. With a sharpened strategic focus on disciplined growth, operational excellence, digitalisation, and capital efficiency, the company is committed to accelerating India's clean energy transition while delivering long-term value to stakeholders. The company is led by an experienced and committed leadership team, built on the foundation established and strengthened under Zelestra. Resolven is powered by EQT, one of the world's largest private markets firms with EUR 270 billion in total assets under management.

CERC has issued Draft Order in Petition No. 1/SM/2026 on 'Rate of Congestion charge in real-time operation in inter-state transmission of Electricity' wherein Comments/ suggestions of the stakeholders are invited by 06.04.2026. I am writing to formally submit our comments and suggestions for the same. Please find the detailed comments and observations attached for your kind consideration.

Yours sincerely,
Sonika Hayaran
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Resolven Comments on CERC order in Rate of Congestion charge in real-time operation in inter-state transmission of electricity (1/SM/2026).

S.No	Existing Provision in Order in 1/SM/2026	Remarks	Request from Hon'ble Commission
1	10. 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,	Electricity generation from a renewable energy project hugely depends on prevailing weather conditions and beyond the control of the project developer. Hence, the Commission's observation that "RE sources cannot be exempted from the congestion charge" does not adequately account for the inherent operational challenges faced by the RE project developers. Unlike conventional generating stations, renewable energy plants require frequent control of electricity generation. During the situation of grid Congestion, frequent ramping-down of available capacity may be required to manage power exports near to the schedule. Any forced reduction in electricity generation results in irrevocable energy spillage, thereby leading to a permanent loss of available renewable energy. Hence, renewable energy projects	Already bid out RE Project may be exempted from levy of congestion charges. And New RE generator may be provided with a "grace period" of 4 time-blocks (1 hour) to respond to congestion warnings before charges apply conspiring invariability.

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	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.	shall be exempted from the levy Congestion charge	
2	12 (a) The rate of congestion charge shall be 1.5 times the 'Reference Charge Rate' (RR), 'Contract rate' or 'Normal Rate of Charges for Deviation' (NR), as applicable for such entity for such time block as per Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) Regulations, 2024 and subsequent amendments and re-enactments, with a minimum rate of Rs 3/unit and a maximum of Rs 10/unit	DSM-Linked Multiplier (1.5x) The proposal to set congestion charges at 1.5 times the DSM rate constitutes dual penalization. RE generators already pay deviation charges (DSM charges) for any deviation from the Schedule. this inherent variability makes it challenging to precisely match generation with real-time demand. 1.5 multiplier to DSM charges (subject to floor and ceiling charges) will have huge impact on the financial viability of the RE Projects.	Congestion charges should only apply to deviations beyond the existing DSM tolerance bands. Further, with respect to Minimum/Maximum price we humbly submit that the ceiling rate for congestion charge be set considering Weighted average RE tariff for past 3 years for respective RE category.

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		Objection to the Minimum and Maximum rate Renewable Energy projects enjoy Must Run Status. A floor rate of ₹3/kWh over and above the DSM rate is economically disconnected from the "Must-Run" status of RE. During peak solar hours, the Market Clearing Price (MCP) often drops below ₹0.5/kWh. Applying a ₹3/kWh congestion penalty for "over-injection" essentially forces RE generators to curtail power, leading to a national loss of green energy. RE projects developers operate their projects at very thin margins and a small penalty has potential to jeopardise its viability. Hence, while maintaining the grid security is aim for the Commission and all regional entities, it shall also be ensured that financial viability of power projects is not hampered.	
	Additional comments	To ensure grid security while allowing adequate opportunity to all power	In adequate transmission system due to delay in completion of

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		generating companies to evacuate full electricity generated from their project, it is essential that all transmission service providers complete their projects as per agreed schedule. Unlike conventional generation projects where dedicated transmission system is planned for standalone project; a single transmission scheme is planned to provide grid connectivity for several RE projects. These schemes have several transmission elements, and their huge size have inherent completion risks right from the day they are awarded. Currently, transmission service providers are unable to complete their projects as per agreed schedule. As against this RE projects to meet their commitments under PPA are commissioned as per schedule. This creates mismatch in the availability of generation capacity viz-a-viz transmission system potentially leading to congestion in transmission system	transmission projects by transmission system developers is beyond the control of the RE project developers. Hence, inadequate transmission grid leading to congestion system shall not result into an additional penalty on generation projects. Congestion charges should be waived for generators which are facing curtailment due delay in Inter State Transmission System

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		during peak generation hours.	
	Additional comments	Encouraging Storage as a Solution Instead of penalties, the Commission should incentivize relief.	Regional Entities may be encouraged to use Battery Energy Storage Systems (BESS) to mitigate congestion. Financial support may be provided in this regard.
	Additional comments	Electricity generation from Renewable energy projects is affected by the local weather pattern and highly intermittent. To avoid levy of congestion charges on the RE generators, they must maintain generation to the schedule. As per draft procedure issued by NLDC, in a congestion situation notice will be issued to all regional entities. If congestion is not relieved in next 2-time blocks, congestion charges are levied on the defaulting entities.	Hence, while congestion charges are made applicable on the RE generators, it is also requested to provide them opportunities to manage their generation and save penal congestion charges. It is suggested to allow RE generators to- 1) Over Injection – sell excess generation, if any, in Real Time Markets. 2) Under Injection - Buy deficit generation, if any, from Real Time Market, 3) Reduce gate closure to 4-time blocks for implementation of revised schedule, Above options will help RE generators to efficiently manage actual generation to the schedule and avoid congestion charge.