

===== Forwarded message =====

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Date: Mon, 06 Apr 2026 23:27:19 +0530

Subject: Comments on CERC Order Dated 13.03.2026 in Petition No.

1/SM/2026_Congestion Charge Regulations

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Dear Sir/Madam,

This has reference to your Order Dated 13.03.2026 in Petition No. 1/SM/2026, wherein you had invited Comments/ suggestions of the stakeholders.

We extend our sincere thanks for providing this opportunity.

Please find attached our comments, both in Word and PDF format.

In case of any further clarifications/elaborations on the issues raised in our submission are required, please do advise us.

Yours Sincerely,

Ujjwal Surana

Ujjwal Surana

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2 Attachment(s)

CERC_Congestion-Charge-Regulation_2026-04-06_Sembcorps Comments on Petition 1-SM-2025.pdf

258.6 KB

CERC_Congestion-Charge-Regulation_2026-04-06_Sembcorps Comments on Petition 1-SM-2025.docx

38.6 KB

Sembcorp's Comments/suggestions on Order Dated 13-Mar-2026 in Petition No. 1/SM/2026

[In the matter of CERC (Measures to relieve congestion in real time operation) Regulations, 2009]



Sr.	Issues	Comments/suggestions
1.	Multiplicity of Regulations	The following three regulations - 1. DSM Regulations 2. Ancillary Services Regulation 3. Congestion Charge Regulations - although appear to serve different purposes but have profound commonalities and overlaps. • The modalities of following each of these regulations involves upward/downward movement of generation, with associated commercial advantage/disadvantages. • All of these ultimately serve the common purpose of grid discipline, Therefore, there is a strong case for harmonizing amongst these regulations. For example, whether Congestion Charges can be levied even when Ancillary Services have not been deployed. Similarly, is there a temporal hierarchy between various actions under these regulations or are they simultaneous. Such aspects need to be established, if not, and communicated to all stakeholders.
2.	Applicability of Congestion Charges on RE	Congestion charges should be applicable on the entities deliberately causing the congestion, including the transmission service providers. In case of RE generators, the generation is dependent on the forces of nature; the only tool available with the RE generators is “forecast”, which they try to bring as accurate as possible. However, unlike conventional generators, RE generators do-not have a control on the “generation” <i>per-se</i>, at any given instant. Therefore, it will be inappropriate to levy congestion charges on RE generators, when they have already taken all measures in their control, to minimise the deviation between the schedule and actual generation. Therefore, it is requested to exempt RE generators from the applicability of Congestion Charges.
3.	Schedule Revision only after 7-8 time-blocks v/s Applicability of Congestion Charges from 2 time-blocks.	RE generators are allowed to revise the schedule only after a gap of 7-8 time-blocks, whereas the Congestion charges become applicable after 2 time-blocks. This results in a contradictory proposition for RE generators: while on one hand they are not allowed to revise their schedules more promptly – and thereby support the grid, on the other hand, they are also penalized in form of congestion charges, in such intervening period. For this reason also, it is requested to exempt RE generators from the applicability of Congestion Charges.
4.	Congestion charges for under-injection	Congestion Charges are applicable for over-injection as well as under-injection. In case of RE generators, there is no control on the fuel, and it is just not possible to increase the generation at their own discretion. Therefore, notwithstanding our request to completely exempt RE from the very applicability of Congestion Charges, at least in the specific case of under-injection, the Congestion Charges should not be applicable to RE.
5.	Curtailment / TRAS-Down Emergency v/s Congestion	In case of RE generators that are facing curtailment due to delay in transmission infrastructure, simultaneous levy of congestion charges would amount to double penalty. Therefore, , notwithstanding our request to completely exempt RE from the very applicability of Congestion Charges, it is requested that Congestion Charges should not be applicable in case a RE generator is facing curtailment/TRAS-Down Emergency.