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Date: Mon, 06 Apr 2026 20:32:00 +0530
Subject: Comment on 1/SM/2026_Rate of Congestion charge
===== Forwarded message =====

Dear Sir,

Please find attached comments on rate of congestion charge invited under order 1/SM/2026.

Regards
Jaibardhan
Torrent Green Power Ltd.

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Comments on Congestion charges.pdf
46.3 KB

Comments on Congestion charges(1/SM/2026)

-Presently Power market has grown and there are charges applicable to maintain grid discipline like DSM charges, RTDA charges. In case of over drawal / under drawal by DISCOM/buyer and over injection/ Under Injection in VRE generator is being penalized by DSM and RTDA charges, applicability of congestion charges is punishing for the same event twice.

Comments on methodology Provided in (1/SM/2026) for congestion Charges

Sl. No.	Description	Suggestion	Rationale
1	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..	The rate of congestion charge shall be 0.5 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 1.5 /unit and a maximum of Rs 5/unit.	-In case the over injection by VRE within its permissible range as per DSM regulation, even in this case congestion charges may be applicable. Thus under DSM regulation VRE is incentivised to maintain grid discipline where as in Congestion charges calculation VRE is penalised for the same instance.
2	Clarification	NA	We understand that Auxiliary Power consumption is not scheduled therefore there will be no congestion charges on auxiliary Power drawal.

3	Clarification	NA	We understand that congestion charges will be receivable by the regional entities supporting the transmission corridor to relive from congestion pressure.
4	Clarification	NA	We understand that congestion charges shall be levied at regional periphery i.e., PSS level.
4	A proviso shall be added in 12. b.	Provided in case of curtailment of RE power during peak Solar / Wind period by SLDC/RLDC resulting in revenue losses should be compensated from Congestion charges account @ DSM rate.	RE generation face curtailment during peak Solar / Wind period by SLDC/RLDC resulting in revenue losses. Hence this loss should be compensated from Congestion charges account @ DSM rate.
5	A new provision 12. C. shall be added	The change in rate of congestion charges will be considered as Change in Law event.	Applicability of congestion charges due to scarce availability of Transmission corridor will lead to unaccounted charges before finalising contract. Thus, Congestion charges shall be reckoned as Change in law event.