========== Forwarded message ==========
From: DGM CGS APPCC <dgmcgsappcc@gmail.com>
To: <secy@cercind.gov.in>, "Shilpa Agarwal"<shilpa@cercind.gov.in>
Cc: "PARANDHAMAYYA MUGGALLA"<parandhamayya.m@aptransco.gov.in>, "sasibindu.s"<sasibindu.s@aptransco.gov.in>, "DARSHAN S L M"<darshan.slm@aptransco.gov.in>, "azmatulla.sk"<azmatulla.sk@aptransco.gov.in>
Date: Fri, 23 Oct 2026 16:20:29 +0530
Subject: comments/suggestions on Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026.
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Sir/Mam,
Please find the comments/views **of APDISCOMS** on Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026 attached for reference.
Kindly consider our views please.

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Regards,
O/o DGM/CGS & PGCIL/APPCC

COMMENTS / SUGGESTIONS OF APDISCOMs ON

Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026

Sl. No.	Clause / Draft Provision	Commercial concern from APDISCOMs' perspective	Suggested comments / modification for CERC
1	**Para 11 – New Regulation 30A and Para 2 – Definition of 'Congestion charge'**	The draft provides for levy of congestion charges in addition to DSM charges. **However, it is not clear how the embedded entities responsible for causing or increasing congestion will be identified**. Without a clear method for identifying responsibility and allocating the charges, states may face additional financial burdens, including in situations where congestion arises due to system contingencies or factors beyond their control.	It is suggested that the definition of congestion charge and Regulation 30A(1) be revised to **clearly identify the entities responsible for causing or increasing congestion and specify how the charges will be allocated**. The procedure should distinguish between deviations attributable to an entity and those arising from system constraints or other factors beyond its reasonable control.
2	**Regulation 30A(5)–(8) and Para 17 – Congestion-charge accounts, payment and transition**	The draft provides for weekly statements, payment within 10 days and interest at 0.04% per day for delayed payment. It also proposes repeal of the 2009 congestion regulations while continuing the existing rate/procedure until replacement arrangements are notified. Commercial certainty requires a clear transition and a verifiable statement of charge and beneficiary-wise allocation.	1. The RPC statement should include **entity wise corridor, time block, triggering flow, applicable threshold/rate, identified cause, calculation and entity-wise allocation**, with a defined period for raising and resolving disputes. This is to clearly demarcate embedded entities from States. 2. The reference to the Second Amendment Regulations, 2025 in proposed Regulation 59(5) may be corrected to 2026.
3	**Para 12(3) – New Regulation 45(16): Regulation of access for defaulting entities**	The draft permits complete regulation of T-GNA, followed by short-term contracts under GNA and progressive reduction of other access for defaults in DSM, congestion or reactive energy charges, or non-maintenance of payment security. It also permits NLDC to temporarily review T-GNA regulation in exceptional grid-security circumstances. The proposal does not expressly address disputed amounts, prior notice.	The regulation of TGNA followed by other GNA contracts as mentioned in draft regulation **shall not be applicable to disputed amounts** (whether full or partial) .
4	**Para 13(6) and Annexure-9 – SCUC decommitment and settlement**	The draft permits NLDC to run SCUC 'at any time of the day', whereas Annexure-9 appears to prescribe day-ahead/D-1 processes. It also provides for SCUC-Down and commensurate SCUC-Up, with startup costs, where applicable, paid from the Deviation and Ancillary Service Pool Account. The treatment of in-day decommitment, schedule revisions and ultimate cost incidence needs to be clear to avoid unintended pass-through to beneficiaries.	**Regulation 46(6) and Annexure-9 should be harmonized to specify the applicable timelines** and scheduling/accounting treatment for both day-ahead and in-day SCUC decisions.
5	**Para 16 – Shortening of schedule-revision timelines under Regulations 48 and 49**	While APDISCOMs acknowledge that moving RTM gate closures closer to real-time theoretically improves Renewable Energy (RE) forecasting accuracy, this benefit is heavily eclipsed by practical operational risks. A compressed 5-minute bidding window leaves virtually zero margin for software latencies or manual	The phased implementation may be retained subject to prior system testing, stakeholder consultation. The Phase1 implementation shall be treated as pilot project and subsequently, a stakeholder meeting may be organized to highlight the difficulties faced by various entities during implementation of Phase 1.

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		interventions within the Web-Based Energy Scheduling (WBES) portal.	
6	**Para 19 – Annexure-4: Replacement of the existing delay threshold with 'beyond due date'**	The draft proposes replacing the existing wording relating to delay beyond twelve days from issue of the RPC statement with 'beyond due date'. The amendment should be applied consistently with the relevant account, payment due date and dispute-resolution provisions to avoid ambiguity regarding when a default or related consequence arises.	CERC may clarify the precise due date applicable to each statement and ensure that the same is consistently reflected in the IEGC, RPC procedures and relevant payment provisions.