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Power

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To

Secretary,
Central Electricity Regulatory Commission,
World Trade Centre
New Delhi -110029

Sub.: Comments on Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026.

Dear Sir,

With reference to the comments invited by the Ld. CERC, on the above-mentioned Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026., we hereby submit our comments on the same with a request to kindly take the same on record.

Thanking You,
Yours Sincerely,
For **Adani Power Limited**

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APL Comments on
Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026.

Sr. No.	Draft Paragraph	Proposed Paragraph	Rationale
1	**7. Amendment to Regulation 25 of the Principal Regulations:** **"25A Scheduling of infirm Power** …… (3) In the absence of any specific provisions of treatment of sale of power prior to achieving commercial operation under the contract: (a) such power shall be first offered to the buyers with whom the generating station or ESS has entered into a contract either directly or through REIA or intermediary procurer, with an advance notice of at least seven (7) days. (b) If the buyer(s) give their consent to procure such power, the same shall be scheduled to the buyer(s) at a tariff mutually agreed between buyer(s) and the generating station. (c) If the buyer(s) or the REIA or intermediary procurer do not respond within such notice period, it shall be considered as a deemed refusal of the buyer(s) or REIA or intermediary procurer and in such a case the generating station shall be free to sell such power to any of the third party outside the Contract."	**7. Amendment to Regulation 25 of the Principal Regulations:** **"25A Scheduling of infirm Power** …….. (3) In the absence of any specific provisions of treatment of sale of power prior to achieving commercial operation under the contract: (a) such power shall be first offered to the buyers with whom the generating station or ESS has entered into a contract either directly or through REIA or intermediary procurer, with an advance notice of at least seven (7) days. (b) If the buyer(s) give their consent to procure such power, the same shall be scheduled to the buyer(s) at a tariff mutually agreed between buyer(s) and the generating station. (c) If the buyer(s) or the REIA or intermediary procurer do not respond/provide consent within such notice period, it shall be considered as a deemed refusal of the buyer(s) or REIA or intermediary procurer and in such a case the generating station shall be free to sell such power to any of the third party outside the Contract."	For better clarity and to avoid unnecessary disputes.

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2	**12. Amendment to Regulation 45 the Principal Regulations:** **(3)** The following new Clauses shall be added after Clause (15) of Regulation 45 of the Principal Regulations: **(16) Regulation of access to defaulting entities** …… (iii) The reduction or withdrawal of access for sale and purchase of electricity through contracts other than short-term contracts shall be in such a manner that the quantum of reduction in drawal or injection schedule increases progressively by five per cent (5%) for each month of default.	**A new Clause shall be added after clause 16 (iii)** (iv) In case of such reduction or withdrawal of access for sale and purchase of electricity, the liability for payment of capacity charges and/or transmission charges shall remain with the defaulting entity.	In case of default continue even after two months after regulation of T-GNA, entire short-term contracts and 5% of the other than short term contracts shall be regulated to put pressure on defaulting entity to cure the default at the earliest. Non-defaulting entities may not suffer due to defaulting entities.
3	**13. Amendment to Regulation 46 the Principal Regulations:** (1) New sub-clause (a-i) and (a-ii) shall be inserted after sub-clause (a) of Clause (4) of Regulation 46 of the Principal Regulations as under: "(a-i) The generating station shall, by 1430 Hrs of 'D-1' day, inform the RLDC and beneficiaries of the proposed unit(s) to be taken under USD.	**13. Amendment to Regulation 46 the Principal Regulations:** (1) New sub-clause (a-i) and (a-ii) shall be inserted after sub-clause (a) of Clause (4) of Regulation 46 of the Principal Regulations as under: "(a-i) The generating station shall, by 1430 Hrs of 'D-1' day, inform the RLDC and beneficiaries of the proposed unit(s) to be taken under USD.	The minimum turndown level for the generation should be 55% in line with current CEA Guidelines/ Regulations. Further, there is no rationale for keeping 50% as technical minimum and therefore, the generating station shall be permitted to take USD if the schedule or revised schedule is not above the minimum turndown level (55%).

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	(a-ii) The beneficiaries may revise schedules by 1530 Hrs of 'D-1' day to retain such units on-bar by ensuring scheduling of at least **50% MCR** for all time blocks." (2) Sub-clause (b) of Clause (4) of Regulation 46 of the Principal Regulations shall be substituted as under: "(b) The revised requisition from the said generating stations, once confirmed by the beneficiaries by 1530 Hrs of D-1 day, shall be final and binding after 1530 Hrs of D-1 day and further reduction in drawal schedule shall not be allowed from such stations except in cases when the generating stations remain **above minimum turn-down level**." (3) A new sub-clause (b-i) shall be inserted after sub-clause (b) of Clause (4) of Regulation 46 of the Principal Regulations as under: **"**(b-i) The generating station may declare units under USD by 1600 Hrs of 'D-1' day if the schedule of at least **50% of MCR** in all time blocks is not achieved.**"**	(a-ii) The beneficiaries may revise schedules by 1530 Hrs of 'D-1' day to retain such units on-bar by ensuring scheduling of at least ~~50%~~ **55% MCR** for all time blocks." (2) Sub-clause (b) of Clause (4) of Regulation 46 of the Principal Regulations shall be substituted as under: "(b) The revised requisition from the said generating stations, once confirmed by the beneficiaries by 1530 Hrs of D-1 day, shall be final and binding after 1530 Hrs of D-1 day and further reduction in drawal schedule shall not be allowed from such stations except in cases when the generating stations remain **above minimum turn-down level**." (3) A new sub-clause (b-i) shall be inserted after sub-clause (b) of Clause (4) of Regulation 46 of the Principal Regulations as under: **"**(b-i) The generating station may declare units under USD by 1600 Hrs of 'D-1' day if the schedule of at least ~~50%~~ **55% of MCR** in all time blocks is not achieved.**"**	The USD threshold should ideally be aligned with the prescribed technical minimum. Otherwise, if technical minimum is maintained at 55% while USD is permitted only below 50%, a unit receiving a schedule between 50% and 55% of MCR may be required to operate below its technical minimum without having the corresponding flexibility to opt for USD. Accordingly, 55% of MCR may be proposed as the USD threshold to maintain consistency between technical minimum requirements and the USD framework.

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4	**16. Amendment to Regulations 48 and 49 to facilitate shortening of timeline between revisions:** …….(B) Second phase of implementation…… (2) The time "22.45" shall be substituted with time "23.15" and time "23.00" shall be substituted with time "23.20" in sub-clause (q)(ii) of Clause (1) of Regulation 49 of the Principal Regulations. (3) The time "23.00" shall be substituted with time "23.20" in sub-clause (q)(iv) of Clause (1) of Regulation 49 of the Principal Regulations.	**16. Amendment to Regulations 48 and 49 to facilitate shortening of timeline between revisions:** …….(B) Second phase of implementation…… ~~(2) The time "22.45" shall be substituted with time "23.15" and time "23.00" shall be~~ ~~substituted with time "23.20" in sub-clause (q)(ii) of Clause (1) of Regulation 49 of~~ ~~the Principal Regulations.~~ ~~(3) The time "23.00" shall be substituted with time "23.20" in sub-clause (q)(iv) of Clause~~ ~~(1) of Regulation 49 of the Principal Regulations.~~	The bidding window should remain 15 minutes under the proposed arrangement from ph-2 effective 01.4.2027, as generators need adequate time to submit RTM bids, including multiple bids under the Electricity LPS Rules, as well as TRAS bids. Since bidding relies on systems such as WBES, internet connectivity, and exchange software, any disruption could cause participants to miss the opportunity to place bids on the exchange. While the reduction in RTM gate closure from 75 minutes to 45 minutes before delivery under Phase-II has brought the market closer to real-time operation, making forecasting more practical and helping generators reduce DSM exposure, it has also significantly reduced the bidding window from 15 minutes to only 5 minutes. In situations where backdown instructions are issued close to the gate closure timeline, generators are left with a very limited time to receive the revised schedules, verify the backed-down quantum, and place bids in the RTM. This makes timely

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			compliance under the LPSC provisions operationally challenging, even when the generator intends to comply with the prescribed requirements for recovery of fixed charges. Accordingly, considering the practical difficulties arising from the shortened bidding window and system-related delays in availability of scheduling data, it is requested that the requirement of mandatory RTM bid submission under the LPSC framework for recovery of fixed charges be delinked. Fixed charge recovery may instead be allowed, without making it contingent upon successful bid placement within a highly constrained bidding window.