From: Rajneesh Kumar Kaushal <Rajneesh.Kaushal@vedanta.co.in>
To: "'secy@cercind.gov.in'"<secy@cercind.gov.in>,
"shilpa@cercind.gov.in"<shilpa@cercind.gov.in>
Cc: "Prashant Kumar"<Kumar.Prashant@vedanta.co.in>, "Hitesh Chhugani"<Hitesh.Chhugani2@vedanta.co.in>,
"Balco.Power.Sales"<Balco.Power.Sales@vedanta.co.in>
Date: Wed, 21 Oct 2026 14:31:28 +0530
Subject: BALCO's Comments on Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026
========== Forwarded message ==========

Respected Madam,/Sir,

In reference to the proposed amendment to **Regulation 30(11), read with Annexure-3, of the Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026**, BALCO submits that the reserve framework should also recognise Regional Entity Bulk Consumers that substantially meet their electricity demand through conventional and renewable Captive Power Plants, connected through the dedicated transmission lines or grid, and rely on the grid mainly during outages, generation shortfalls, start-up requirements and other contingencies.

Accordingly, BALCO requests the Hon'ble Commission to clarify that:

1. The reserve requirement of a Bulk Consumer shall be determined based on its **net and measurable contribution to Area Control Error ("ACE")/deviation**, after appropriately considering its conventional and renewable captive generation and normal dependence on the grid.
2. Temporary grid drawal during outages, generation shortfalls or other contingencies of Captive Power Plants shall not, by itself, result in a disproportionate reserve obligation.
3. Forecasting errors and deviations of renewable generation, where already attributed to and settled against the responsible generator, Qualified Coordinating Agency ("QCA") or Bulk Consumer under the applicable forecasting, scheduling and deviation-settlement framework, shall not be counted again while determining the reserve obligation of the Bulk Consumer.
4. Bulk Consumers shall be permitted to fulfil their reserve obligations through their own eligible resources, demand response, energy storage systems, procurement from the ancillary-services market or any other mechanism approved by the Commission.

BALCO therefore requests the Hon'ble Commission to provide suitable clarity in the final Regulations or the detailed procedure issued thereunder, so as to avoid duplication of obligations and ensure fair allocation of reserve requirements based on the Bulk Consumer's actual and measurable impact on the grid.

Regards,
Rajneesh Kumar Kaushal
Bharat Aluminium Company Ltd. (BALCO)
Balco Nagar, Korba – 495684, Chhattisgarh
M: +91-9589098002 | www.balcoindia.com