CONTINUUM

CONTINUUM GREEN ENERGY LIMITED

(formerly known as Continuum Green Energy Private Limited and Continuum Green Energy (India) Private Limited)

To,
Shri. Harpreet Singh Pruthi,
Secretary, CERC, 6th, 7th & 8th Floors,
Tower B, World Trade Centre,
Nauroji Nagar, New Delhi- 110029.

Date:- 02.11.2026

Subject: Suggestions and Comments on the Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026

Respected Sir,

We are thankful to the Hon'ble Commission for providing an opportunity for us to share Suggestions and Comments on Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026.

In this regard, please find our comments provided in Annexure A, enclosed along with this letter.

We request Hon'ble Commission to kindly consider our submissions, as may be considered appropriate by them.

Yours Sincerely,

For Continuum Green Energy Limited.

CONTINUUM GREEN ENERGY LIMITED

Authorized Signatory

Registered Office: Survey No. 356 & 391, Periyakumarapalayam Village, Gudimangalam, Dharapuram Taluk, Tirupur District, Coimbatore – 642 201, Tamil Nadu, India
Corporate Office: 402, 404 & 504, Delphi, C Wing, Hiranandani Business Park, Orchard Avenue, Powai, Mumbai – 400 076, Maharashtra, India
+91 22 25701567 +91 22 25703360
CIN: U40102TZ2007PLC038605 Website : www.continuumenergy.in Email ID: info@continuumenergy.in

ANNEXURE A

Comments and Suggestions on Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026

S. No.	Clause No.	Existing Clause of Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026	Proposed Clause in Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026	Suggestions and Comments to the Hon'ble Commission
1	Regulation 30A	CONGESTION CHARGE, (1) Applicability of Congestion Charge	30A (1). *(existing text retained)* ***Provided that no congestion charge shall be levied for congestion in a transmission corridor if the power flow on the corridor is as per the schedule, but the congestion has been caused by forced outage of a line in the corridor occurring after the schedule has been fixed.***	In CERC Order dated 13.03.2026 in Petition No. 1/SM/2026 (para 12(b)), the Central Electricity Regulatory Commission (CERC) proposed that no congestion charge be levied where congestion arises from a forced line outage occurring after schedules are fixed. Draft Regulation 30A does not include this exemption. It is requested that the above proviso be added to Regulation 30A(1). We humbly submit to the Hon'ble Commission that a generator that has followed its schedule has not caused the congestion. A forced outage after the schedule is fixed is a grid contingency beyond its control. Levying the charge in that case would penalise a schedule-compliant generator.
2	Para 5(6): four new	"Provided that the trial run of a standalone ESS	***"Provided that the trial run of a standalone***	Once the trial run is allowed, there will be no

	provisos to Reg. 22(3)(e)	shall be performed for a minimum capacity aggregating to 50 MW: Provided further that in the case of a standalone ESS having a capacity of more than 50 MW and less than 250 MW, the trial run for the balance capacity shall be performed in a maximum of three instalments with a minimum capacity of 5 MW: Provided also that the trial run for a standalone ESS aggregating to less than 50 MW covered under clause (e) or clause(f) of Regulation 4.1 or Regulation 4.4 of the GNA Regulations, shall be allowed for the capacity for which Connectivity has been granted to such an entity: Provided also that in the case of a project having a capacity of 250 MW or more, the trial run may be performed in instalments, with a minimum capacity of 50 MW without any limit on the number of instalments."	***ESS, irrespective of its capacity and whether or not it has entered into a contract for sale of power, may be performed in instalments with a minimum capacity of 5 MW per instalment, without any limit on the number of instalments, for the capacity for which Connectivity has been granted to such an entity."***	implications on the grid, and the capacity of the ESS does not matter. It should be allowed in tranches of 5 MW. The number of instalments should not be restricted, as the capacity is ready and it should be allowed to be commissioned. If there is no contract, 5 MW commissioning should still be allowed, and where a contract exists, commissioning should also be allowed.