========== Forwarded message ==========
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To: <secy@cercind.gov.in>, <shilpa@cercind.gov.in>
Date: Tue, 27 Oct 2026 15:25:08 +0530
Subject: Technical suggestions on Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026
========== Forwarded message ==========

Respected Sir/Madam,

The Department of Electrical Engineering, CSPIT, CHARUSAT, submits the following technical suggestions for consideration while finalising the proposed amendment to the Indian Electricity Grid Code. These recommendations aim to support grid reliability, transparent regulation, renewable energy integration and efficient electricity utilisation.

**1. Transparent congestion-charge assessment (Proposed Regulation 30A)**

It is suggested that congestion charges be determined using a clearly published and technically verifiable methodology that considers the direction and magnitude of deviations, relevant transmission constraints and actual contribution to congestion. NLDC/RLDC may publish the affected corridor, applicable limits, time blocks and charge-calculation basis. Deviations that demonstrably relieve congestion should be distinguished from those that aggravate it.

**2. Proportionate trial-run testing for energy storage systems (Regulation 22)**

It is suggested that the trial-run framework explicitly support modular commissioning of independently controllable battery blocks, while retaining mandatory plant-level verification of grid protection, controls and safety. Standardised performance assessment may include charge/discharge capability, response time, reactive power support and round-trip efficiency. Existing provisions for smaller projects should be retained.

**3. Flexible scheduling of renewable energy during commissioning (Proposed Regulation 25A)**

It is suggested that the seven-day advance notice to buyers, where applicable to pre-commercial-operation electricity, be reviewed for variable solar and wind commissioning. A shorter notice option could be permitted with approval of the concerned Load Despatch Centre, with transparent energy accounting and full compliance with grid-security requirements. This may minimise avoidable renewable energy curtailment.

These suggestions are offered in the public interest for consideration by the Commission. We would appreciate their examination during finalisation of the draft regulations.

Yours faithfully,

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