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(भारत सरकार का उद्यम)
GRID CONTROLLER OF INDIA LIMITED
(A Government of India Enterprise)
CIN : U40105DL2009GOI188682 राष्ट्रीय भार प्रेषण केन्द्र / National Load Despatch Centre
कार्यालय : बी-9, प्रथम एवं द्वितीय तल, कुतुब इंस्टीट्यूशनल एरिया, कटवारिया सराय, नई दिल्ली - 110016
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Ref: GRID-INDIA/NLDC/IEGC/

Date: 02/11/2026

सेवा में,

सचिव, केन्द्रीय विद्युत विनियामक आयोग
6th, 7th एवं 8th फ्लोर, टावर बी, वर्ल्ड ट्रेड सेंटर
नौरोजी नगर, नयी दिल्ली - 110029

विषय/Subject: GRID-INDIA Comments/Suggestions on Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026– Reg.

महोदय/Sir,

The Hon'ble Commission has notified the Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026 dated 21.09.2026.

The Comments/Suggestions on behalf of the Regional Load Despatch Centres (RLDCs) and National Load Despatch Centre (NLDC), Grid Controller of India Limited (GRID-INDIA) on Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026 are enclosed herewith for kind perusal and consideration of the Hon'ble Commission.

सधन्यवाद,

भवदीय/Yours faithfully,

02/11/2026

(Manoj Kumar Agrawal)
Executive Director, NLDC

Copy for kind information:

1. Chairman & Managing Director, GRID-INDIA
2. Director (Market Operation), GRID-INDIA
3. Director (System Operation), GRID-INDIA

Comments / Suggestions of Grid Controller of India Limited (GRID-INDIA)

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

(Ref.: CERC Draft Notification No. L-1/265/2022/CERC dated 21.09.2026)

Sl. No.	Clause / Regulation No.	Proposed Text in the Draft	Comments / Suggestions of GRID-INDIA along with Suggested Clause (if any)	Rationale
1.	**Reg 3(1)** Definition 35a(ii) (Para 2 of Draft)	35a. 'Default trigger date' (i) In case of non-payment of dues, shall be 75 days after the issue of respective account by the Regional Power Committee, and; (ii) In case of non-maintenance of the payment security mechanism, shall be the next bank working day after the payment security mechanism is due to be replenished but is not replenished;	Sub-clause (ii) may also cover failure to open the Letter of Credit required under the DSM Regulations. **Suggested clause:** *(ii) In case of non-maintenance of the payment security mechanism, shall be the next bank working day after the payment security mechanism is due to be replenished but is not replenished, and in case of failure to establish the Letter of Credit as per Clause (2) of Regulation 10 of the DSM Regulations, the sixteenth (16th) day of the current financial year;*	A regional entity that failed to pay deviation charges on time in the previous financial year is required to open an LC within a fortnight from the start of the current financial year under Regulation 10(2) of the DSM Regulations. Sub-clause (ii) does not cover failure to open such LC. Regulation of access may start from the 16th day of the financial year where the LC has not been opened.
2.	**New Proposal** (Reg 3(1) – Definition of 'Partial Outage')	Not defined.	A definition of 'Partial Outage' may be added. **Suggested clause:** *'Partial Outage' means any unplanned outage of auxiliary equipment/ inverter block/ WTG of a generating station that necessitates reduction of generation of a generating unit;*	The term is relied upon in Regulation 45(8) (peak/off-peak DC) and Regulation 49(7-a) (revision of DC), but the reasons that may be treated as partial outage for each category of generating station are not listed in any document. A definition will ensure uniform understanding.
3.	**New Proposal** (Reg 3(1) – Definition of 'Regional entity bulk consumer')	Not defined.	A definition of 'Regional entity bulk consumer' may be added (may be aligned with the definition of bulk consumer under the GNA Regulations).	The draft places reserve obligations on regional entity bulk consumers (Regulation 30(11) and Annexure-3), but the term is not defined.

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			Suggested clause: *'Regional entity bulk consumer' means a regional entity, other than a distribution licensee, drawing power from the ISTS under GNA or T-GNA;*	
4.	**Reg 19(3)(a)(i)** (Para 3 of Draft)	(i) Concerned REGS or ESS (except Hydro PSP ESS) shall inform the detailed reasons for delay in achieving the COD along with the likely date by which it may make a request seeking extension of the period for injection of infirm power.	The wording may be harmonised with the first proviso and sub-clause (ii). **Suggested clause:** *(i) Concerned REGS or ESS (except Hydro PSP ESS) shall inform the detailed reasons for delay in achieving the COD along with the likely date by which it may make a request seeking extension of the period for inter-change of power.*	Sub-clause (i) still refers to "injection of infirm power", while the first proviso and sub-clause (ii) refer to "inter-change of power", which is relevant for ESS as it also draws power.
5.	**Reg 19(3)(a)** (new sub-clause (v))	(ii) The request seeking extension of the period for inter-change of power shall be made at least 10 days prior to the requested start date of interchange of power. (iii) RLDC may allow multiple extensions with a cumulative time extension for three months, after carefully examining the reasons for such extension. (iv) Concerned REGS or ESS (except Hydro PSP ESS) shall keep RLDC informed of the activities to be carried out on monthly basis due to which such extension has been sought by the entity.	A new sub-clause may be added to specify timelines and format through a procedure. **Suggested clause:** *(v) The timeline for furnishing the information under sub-clause (i), the format of the monthly report under sub-clause (iv) and the timeline for the decision of RLDC on the request for extension shall be as specified in the Detailed Procedure issued by NLDC.*	Sub-clause (i) does not specify by when the reasons for delay are to be furnished. There is no standard format for the monthly progress report under sub-clause (iv), and no timeline for RLDC to decide on the request for extension. Absence of objective criteria may lead to differing interpretation.
6.	**Reg 21(1)** (Para 4 of Draft)	The word and number "seven (7)" shall be substituted with the word and number "three (3)" in Clause (1) of Regulation 21 of the Principal Regulations.	Clause (1) may cover rescheduled trial runs, with an additional proviso. **Suggested clause:** *(1) The generating company proposing its generating station or a unit thereof for trial run or repeat of trial run or reschedule of its earlier proposed trial run shall give a notice of not less than*	Under the existing proviso, fresh notice is not required for a repeat trial run within 48 hours of a failed trial run. In many cases the generating station does not start the trial run on the notified date and

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			three (3) days to the concerned RLDC, and the beneficiaries of the generating stations, including intermediary procurers, wherever identified: *Provided that in case the repeat trial run is to take place within forty eight (48) hours of the failed trial run, fresh notice shall not be required:* *Provided further that where the trial run is not commenced on the date first proposed in the notice, for whatsoever reason, it shall be treated as a failed trial run for the purpose of the first proviso; such treatment shall be available only once.*	reschedules it due to technical issues, low wind speed or solar irradiation, inclement weather, unexpected tripping or right-of-way issues. It is not clear whether such a case is a rescheduled trial run requiring fresh notice, or a repeat trial run.
7.	**Reg 21(1) and 21(2)**	The word and number "seven (7)" shall be substituted with the word and number "three (3)" in Clause (1) of Regulation 21 of the Principal Regulations.	The notice period for trial run of transmission systems may also be reduced to three days. **Suggested clause:** *The word and number "seven (7)" shall be substituted with the word and number "three (3)" in Clauses (1) and (2) of Regulation 21 of the Principal Regulations.*	To harmonise the notice period for trial runs of generating stations and transmission systems.
8.	**Reg 22(3)(a)** (Para 5(1)–(3) of Draft)	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.	A proviso may be added for the last balance capacity. **Suggested clause:** *Provided also that where the balance capacity of a solar, wind, ESS or hybrid generating station is less than the minimum capacity specified for an instalment, the trial run for such balance capacity may be performed in one instalment.*	Where the last balance capacity of a solar, wind, storage or hybrid generating station is less than the minimum quantum specified for an instalment, the trial run for the complete balance capacity may be allowed in one instalment.
9.	**Reg 22(3)(a)**	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.	A proviso may be added for cases where CON-TD-4 limits the permissible capacity. **Suggested clause:** *Provided also that in case CTU has granted Connectivity for a capacity of 50 MW or more to a Wind/Solar/ESS/Hybrid Generating Station, but the maximum permissible import/export capacity*	There are cases where CTU has granted Connectivity of 50 MW or more, but the maximum permissible import/export capacity in the applicable CON-TD-4 limits injection or drawal to below 50 MW due to technical

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			specified in the applicable CON-TD-4 restricts the injection or drawal to less than 50 MW due to technical compliance requirements or any other reasons, the trial run may be permitted for the entire capacity allowed under the prevailing CON-TD-4 in one go. The trial run for the complete capacity may be undertaken subsequently, upon issuance of a revised CON-TD-4 by CTU permitting the corresponding increase in maximum permissible import/export capacity, subject to compliance with the applicable regulatory and technical requirements.	compliance requirements. Such entities cannot meet the 50 MW minimum.
10.	**Reg 22(3)(c)** (Para 5(4) of Draft)	The words "clause (e) of Regulation 4.1" shall be substituted with the words "clause (e) or clause (f) of Regulation 4.1 or Regulation 4.4" in the second proviso of sub-clause (c) of Clause (3) of Regulation 22 of the Principal Regulations.	The first proviso to sub-clause (c) may be substituted to specify a minimum instalment size for wind projects. **Suggested clause:** *The first proviso to sub-clause (c) shall be substituted as under:* *"Provided that in the case of a wind power project having a capacity of more than 50 MW and less than 250 MW, the trial run for the balance capacity shall be performed with a minimum capacity of 20 MW:"*	Unlike solar under sub-clause (a), there is no limit on the number of instalments for wind projects under sub-clause (c). On multiple occasions, developers are applying for trial runs of only 2 or 3 WTGs at a time.
11.	**Reg 22(3)(e)** (Para 5(5)–(6) of Draft)	"Provided that the trial run of a standalone ESS 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:	• **Standalone:** The word "standalone" may be deleted from sub-clause (e) and the provisos. • **Number of instalments:** Uniform treatment of four instalments (as for solar) is suggested for trial run of balance capacity of ESS. Each instalment should demonstrate one full cycle at rated power and rated energy. • **Connectivity references:** BESS coming under Clause (a) of Regulation 4.1 (REGS of 50 MW and above where the co-located ESS is below 50 MW) and Regulation 5.2 (addition of capacity, such as	The provisos should apply to all ESS, including ESS forming part of hybrid systems with REGS/RHGS. The draft allows three instalments for ESS against four for solar. The draft does not address the case where an ESS cannot demonstrate full rated capacity

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		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."	BESS below 50 MW, within connectivity already granted) of the GNA Regulations may also be covered. • **Partial demonstration:** Certification may be allowed for the capacity actually demonstrated, with a time-bound requirement to demonstrate the balance. Both MW and MWh/energy-duration should be verified. • **Re-rating:** A re-rating provision, similar to that for thermal generating stations, may be included for ESS. • **Trial run window for a lot:** It may be clarified that all blocks of a lot can complete their trial run within a window of 48 hours. The same may apply to solar and wind.	because of a technical issue in one or more blocks or containers. Many ESS developers have requested de-rated certification after failure of some components. Sub-clause (h) of Regulation 22(3) already permits de-rating, but there is no provision for re-rating once failed blocks or components are restored. Blocks within the same lot often start the trial run at different times, sometimes on different days.
12.	**Reg 22(3)(f)** (Para 5(7)–(8) of Draft)	"Provided that (i) short interruption or load reduction shall be permissible with the corresponding increase in duration of the test; (ii) interruption or partial loading may be allowed with the condition that the average load during the duration of the trial run shall not be less than MCR, excluding the period of interruption but including the corresponding extended period; (iii) cumulative interruption of more than four (4) hours (including both pumping and turbo-generator mode) shall call for a repeat of the trial run; (iv) If it is not possible to demonstrate the design capabilities at rated water drawing level due to insufficient reservoir levels, the COD may be declared, subject to the condition that same shall be demonstrated	The following may be specified and suitable clauses added: • the test duration in each of generating and pumping modes, and whether the demonstration is required for each unit in both modes; • the meaning of "MCR" in pumping mode for fixed-speed units, whose pumping input is set by head; • that variable-speed units shall demonstrate their rated pumping range.	The proviso specifies interruption and average-load criteria, but not the minimum continuous run time in each mode. Without it, the "average load not less than MCR" and "four hours cumulative interruption" tests are difficult to apply. In practice, the turbine-mode and pumping-mode runs are often hours or even days apart.

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		immediately when sufficient reservoir level is available after COD. Provided further that … the pumped storage plant shall have the option to either go for a repeat trial run or de-rate the capacity. …"		
13.	**Reg 22(3)(j)** (Para 5(9) of Draft)	"(j) it is not possible to demonstrate the rated capacity of the plant within one year from the date of COD due to transmission constraints, such plant may demonstrate the rated capacity of the plant within one year from the date of effectiveness of the GNA or one year from the date of COD, whichever is later."	**Suggested clause:** *"(j) it is not possible to demonstrate the rated capacity of the plant/inverter block/WTG within one year from the date of COD due to transmission constraints, such plant/inverter block/WTG may demonstrate the rated capacity for one time block (15 minutes) within one year from the date of effectiveness of the GNA or one year from the date of COD, whichever is later."* The plant may also be required to demonstrate reactive power capability at rated capacity whenever sufficient irradiance or wind speed is available and intimate the same to the concerned RLDC.	The duration of rated-capacity demonstration for solar and wind is not specified. At present, RLDCs verify it from block-wise SCADA data or meter data, as available
14.	**Reg 24(2)** (Para 6(1) of Draft)	The words ", pumped storage plants having a capacity of more than 25 MW and ESS (excluding Pumped Storage Plant) having a capacity of 25 MW and above," shall be added after the words "hydro generating stations having a capacity of more than 25 MW" in Clause (2) of Regulation 24 of the Principal Regulations.	a) ESS should be AGC-capable in both charging/pumping and discharging/generating mode. Fixed speed PSP units may be exempted in pumping mode. b) The Commission may either (a) retain 25 MW and recommend that CEA lower its equipment threshold, or (b) apply 25 MW to ESS commissioned after a specified date. c) A cooling-off period (other than a demonstrated safety or protection limit declared at qualification) should not be a ground for non-availability under AGC. The change between charging and discharging should be seamless under AGC.	Storage spends long periods charging or pumping, particularly in solar hours, when downward regulation is most needed. Limiting AGC to the generating/discharging mode leaves this flexibility unused. The CEA Construction Standards (Amendment) 2026 (in force from 01.04.2027) and the draft CEA Connectivity Standards 2026 require AGC capability for BESS of 50 MW and above; Option (b) ensures that ESS of 25–50 MW built to

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			Suggested clause: *", pumped storage plants and ESS (excluding Pumped Storage Plant) having a capacity of 25 MW and above, in generating/discharging mode, and also in pumping/charging mode in the case of ESS (excluding Pumped Storage Plant) and variable speed units of Pumped Storage Plant,"*	CEA standards are not found non-compliant at commissioning. GRID-INDIA's letter dated 29.09.2026 noted that operational restrictions, including a cooling-off period between charging and discharging, should not impede flexible operation of BESS. The full range from maximum charge to maximum discharge should be available as regulating range.
15.	**New Proposal** (Reg 24(2) – Mandatory SRAS-Down through AGC for REGS)	—	New provisos may be added in Regulation 24(2). **Suggested clause:** *"Provided that REGS and renewable hybrid generating stations having an installed capacity of 100 MW and above, connected to the inter-State transmission system, shall be AGC-enabled and shall provide secondary reserve in the downward direction through AGC, when so instructed by NLDC, in accordance with the Detailed Procedure.* *Provided further that the triggering criteria, technical requirements, performance assessment and timeline for compliance by existing stations shall be as specified in the Detailed Procedure issued by NLDC."*	In Petition 2/SM/2025, the Commission directed NLDC to run AGC pilots with REGS and submit modalities and a commercial framework. GRID-INDIA published a Consultation Paper dated 31.12.2025, submitted stakeholder feedback on 24.07.2026 and specific proposals on 29.09.2026. TRAS-Emergency-Down has applied to inter-State REGS of 100 MW and above since May 2025 through a manual step change in set point. AGC revises set points every four seconds based on regional ACE, giving smoother, finer, near real-time regulation. SRAS-Down through AGC from REGS of 100 MW and above would mainly cover the shortfall of down reserve in solar hours,

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				triggered when ACE crosses a threshold set by NLDC (say 2000 MW). The CEA Construction Standards (Amendment) 2026 require RE plants to have power plant controllers and segregated communication, and the draft CEA Connectivity Standards 2026 require generating stations of 100 MW and above to receive remote active and reactive power instructions from load despatch centres. The 100 MW threshold matches the CEA threshold, so no new hardware obligation is created.
16.	**New Proposal** (Reg 24 – new Clauses (10), (11) and (12): Secondary reserve from ESS)	—	New clauses may be added in Regulation 24 to reflect State of Charge. **Suggested clause:** *"(10) An ESS (excluding Pumped Storage Plant) participating in AGC shall telemeter to the concerned RLDC and NLDC, in real time, its State of Charge and State of Health (as defined in the CEA Technical Standards for Construction of Electrical Plants and Electric Lines), its operating mode and its available upward and downward secondary reserve capability, determined with due regard to its State of Charge and operating limits.* *(11) The minimum duration for which secondary reserve capability is to be sustained, the methodology for determining available capability and the performance assessment in charging and discharging modes shall be as specified in the Detailed Procedure.*	For BESS, reserve is limited by energy as well as power. A BESS rated at 100 MW may not sustain 100 MW of AGC-up or AGC-down if its State of Charge is near its upper or lower limit. Assessing reserve on MW rating alone may overstate available secondary reserve. The CEA Construction Standards (Amendment) 2026 define State of Charge, State of Health, Depth of Discharge, C-rate and plant controller, and require real-time BMS monitoring and data logging. The IEGC should use the same definitions.

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			(12) NLDC may reserve a specified part of the capacity and energy of an ESS for secondary reserve on day-ahead or longer basis, as per the Detailed Procedure; the commercial treatment shall be as specified in the Ancillary Services Regulations."	GRID-INDIA has also proposed (letter dated 29.09.2026) that NLDC may reserve a part of BESS capacity (say ±5% of MW capacity and energy) exclusively for SRAS for 24 hours, against an availability premium. Such reservation needs SoC-based verification.
17.	**Reg 25A(1)** (Para 7 of Draft)	(1) The scheduling of infirm power shall be allowed only post issuance of a certificate of successful trial run as per Regulation 25 of these Regulations.	**Suggested clause:** *(1) The scheduling of infirm power shall be permitted only after issuance of a certificate of successful trial run in accordance with Regulation 25 of these Regulations and upon fulfilment of the documentary requirements specified under Clause (5)(a) of Regulation 45 of these Regulations.*	Scheduling of infirm power should also be subject to the documentary requirements under Regulation 45(5)(a), including documents supporting the grant of GNA or Connectivity, the effective date of GNA and deemed T-GNA, and copies of valid contracts between sellers and buyers.
18.	**Reg 25A(3) and 25A(3)(c)**	(3) In the absence of any specific provisions of treatment of sale of power prior to achieving commercial operation under the contract: (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.	Cases of disagreement on the contract may be expressly treated as deemed refusal. **Suggested clause:** *(3) In the absence of any specific provisions of treatment of sale of power prior to achieving commercial operation under the contract, or in case of disagreement between the buyer and seller on any provision of the contract regarding the offer of infirm power:* *(c) If the buyer(s) or the REIA or intermediary procurer do not respond within such notice period, or if the buyer do not agree on the offer of infirm power as per the provisions of the contract, it shall be considered as a deemed refusal of the buyer(s) or REIA or intermediary procurer and in such a case*	The draft does not address cases where the buyer and seller interpret the PPA differently and cannot agree. RLDC can only verify the notice-period communication; it cannot adjudicate contractual disputes.

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			the generating station shall be free to sell such power to any of the third party outside the Contract.	
19.	**Reg 25A** (new Clause (4))	No provision.	A new Clause (4) may be added on the start of scheduling of infirm power. **Suggested clause:** *(4) The scheduling of infirm power shall commence from 0000 hours of D+2, where D is the date on which the generating station intimates its intent to commence scheduling of infirm power to the concerned RLDC, along with:* *(a) the consent of the REIA or PPA buyer(s), as applicable, for procurement of such infirm power, including for third-party sale; or* *(b) a declaration by the generating station that either no PPA exists or that the applicable PPA(s) permits sale of infirm power prior to achieving commercial operation, along with the relevant clause of the PPA(s).*	Regulation 25A does not specify when scheduling of infirm power starts, or what RLDC should receive before scheduling it. RLDCs need time to complete registration on NOAR, WBES, REMC and the forecasting modules, and to issue standing clearance for market participation. Scheduling from D+2, as in the case of COD, is suggested.
20.	**Reg 27(1)(e)(i)** (Para 9(4)–(5) of Draft)	": Provided that in case the contract entered into by such generating station or ESS provides conditions other than provided for in these regulations, as prerequisite for achieving commercial operation of such generating station or ESS, the entity shall meet those conditions in terms of the contract prior to power supply under such contract, however such generating station or ESS shall declare commercial operation for the purpose of these regulations after successful trial run in terms of these Regulations."	The treatment of power from the date of COD till the contract conditions are met may be clarified and a necessary framework devised.	At present, COD is declared after the trial-run certificate from RLDC and fulfilment of the contract conditions, such as a compliance certificate from the buyer or REIA. Once COD is de-linked from the PPA, a station may declare COD before meeting those conditions. The draft does not say how its power is to be scheduled in the meantime: as infirm power under Regulation 25A, or as firm power to a third party.

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21.	**Reg 30(10)(g)** (Para 10(1)–(3) of Draft)	(2) The words "and ESS (excluding Pumped Storage Plant)" shall be added after the words "WS Seller" in sub-clause (g) of Clause (10) of Regulation 30 of the Principal Regulations. (3) The words "and Pumped Storage Plant" shall be added after the words "(for hydro generating units" in sub-clause (g) of Clause (10) of Regulation 30 of the Principal Regulations.	The amendment at Para 10(2) may be omitted and Para 10(3) revised. **Suggested clause:** *The words "and ESS (including Pumped Storage Plant)" shall be added after the words "(for hydro generating units" in sub-clause (g) of Clause (10) of Regulation 30 of the Principal Regulations.*	The draft places ESS (excluding PSP) in the 3–6% droop band, on par with thermal units. Battery energy storage is capable of very fast response and is expected to provide fast-response ancillary services. A droop range of 0–10%, as for hydro units, may be considered for such ESS.
22.	**Reg 30(10)(h)** Table 4 (Para 10(4) of Draft)	Following news rows shall be added in Table 4, in sub-clause (h) of Clause (10) of Regulation 30 of the Principal Regulations as under: Pumped Storage Plant | 25 MW and above | As per CEA Technical Standards for Connectivity Energy Storage System (except Pumped Storage Plant) | 10 MW and connected at 33 kV and above | As per CEA Technical Standards for Connectivity	Typographical error: "news rows" may be read as "new rows". Following note may be added below Table 4: *Note: 1. ESS shall maintain state of charge such that the primary response as specified is available in both directions, and Pumped Storage Plants with variable speed units shall also provide primary response in pumping mode.* *2. Till the notification of the CEA (Technical Standards for Connectivity to the Grid) Regulations, 2026, the droop and response requirements for ESS and Pumped Storage Plant shall be as specified in the Detailed Procedure issued by NLDC.* *Every reference to CEA Technical Standards in these regulations shall be construed as a reference to such standards as amended or superseded from time to time.*	Primary response from ESS depends on its state of charge; it must be available in both directions. Variable speed PSP units can provide primary response in pumping mode as well. Response values for ESS and PSP in the existing CEA Connectivity Standards are not yet specified; an interim arrangement is required till the revised CEA standards are notified.
23.	**Reg 30(11)** (Para 10(5)–(10) of Draft)	(7) The words "and regional entity bulk consumer," shall be inserted after the words "State control area" occurring multiple times in sub-clause (q) of Clause 11 …	The words "and regional entity bulk consumer" may also be added with "State control area" in: • sub-clause (d) – auto-calculation of ACE; • sub-clause (n) – estimation of All India secondary reserve requirement;	The draft brings regional entity bulk consumers into sub-clauses (q) and (t) only. For the obligation to be workable, RLDC/NLDC must also compute ACE and the reserve requirement for them.

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		(9) The words "or regional entity bulk consumer, as the case may be," shall be inserted after the word "State" occurring multiple times in sub-clause (t) of Clause 11 …	• sub-clause (o) – allocation of secondary reserve capacity; • sub-clause (r) – re-assessment of secondary reserve requirement. Under sub-clause (e), the Frequency Bias Coefficient (Bf) may also be assessed for the regional entity bulk consumer control area.	
24.	**New Proposal** (Reg 30(12) – Tertiary reserve)	—	The obligation to maintain tertiary reserve may also be extended to regional entity bulk consumers. **Suggested clause:** *The words "and regional entity bulk consumer" shall be inserted after the words "State control area" wherever occurring in sub-clauses (a) to (f), and the words "or regional entity bulk consumer, as the case may be," shall be inserted after the word "State" in sub-clause (h) of Clause (12) of Regulation 30 of the Principal Regulations.*	For consistency with the secondary reserve obligation placed on regional entity bulk consumers in the draft.
25.	**New Proposal** (Reg 30 – new Clause (14): Double accounting of reserve)	—	A new Clause (14) may be added in Regulation 30. **Suggested clause:** *(14) "The capacity of a generating station or ESS committed towards primary reserve, secondary reserve, tertiary reserve and its injection or drawal schedule shall not overlap in the same time block. The methodology for accounting of reserve capacity across services, and the priority among concurrent instructions, shall be specified in the Detailed Procedure issued by NLDC."*	To prevent the same MW from being counted towards more than one reserve service, or towards both a reserve and a schedule, in the same time block.
27.	**Reg 30A(3)** (proviso)	Provided that notice of at least two clear time blocks shall be given by the RLDCs before congestion charge becomes	**Suggested clause:** *Provided that notice of at least two clear time blocks shall be given by the NLDC or RLDCs before congestion charge becomes applicable, not*	The main clause empowers both NLDC and RLDCs to apply congestion charge, and inter-

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		applicable, not counting the time block in which the notice is issued.	*counting the time block in which the notice is issued.*	regional corridors are monitored by NLDC.
28.	**Reg 30A(4)**	(4) Notice for withdrawal of congestion charge. When in the opinion of the NLDC or RLDCs, flow of electricity on the affected transmission link or corridor has come down to the ATC, it may, after notice … withdraw the applicability of congestion charge from a particular time-block: Provided that notice of one time block shall be given by the Regional Load Despatch Centre before congestion charge is withdrawn, not counting the time block in which the notice is issued.	**Suggested clause:** *(4) Notice for withdrawal of congestion charge. When in the opinion of the NLDC or RLDCs, flow of electricity on the affected transmission link or corridor has come down to the ATC at least for two time blocks, it may, after notice through voice or e-mail message and through posting on its website and the common screen available on the Energy Management System, withdraw the applicability of congestion charge from a particular time-block:* *Provided that notice of one time block shall be given by the National Load Despatch Centre or Regional Load Despatch Centre before congestion charge is withdrawn, not counting the time block in which the notice is issued.*	The period for which the flow should remain within ATC before withdrawal is not specified. Under the existing CERC-approved procedure, congestion charge is applied when the TTC violation persists for two time blocks; a similar condition may apply for withdrawal. NLDC may also be covered in the proviso, as in the main clause.
29.	**Reg 30A(7)**	(7) Release of Congestion Charge Amount. The RLDCs shall, within two working days of receipt of congestion charge, release the amount payable to the Regional Entity entitled to receive congestion charge, along with interest, if any, on account of delay in payment of congestion charge.	The words “along with interest, if any, on account of delay in payment of congestion charge” may be deleted, and disbursement may follow the National Pool Account procedure. **Suggested clause:** *(7) Release of Congestion Charge Amount. The RLDCs shall release the amount payable to the Regional Entity entitled to receive congestion charge as per the Detailed Procedure for implementation, maintenance and operation of the National Deviation and Ancillary Services Pool Account.*	At present, no interest is paid out of the congestion, deviation, reactive energy or ancillary services pools; interest is levied only on entities that pay late. Payment of interest from the pool would depart from this practice. The treatment of interest may be reviewed uniformly across these pool accounts. Payment and disbursement timelines differ across pool accounts: deviation (10 days), reactive energy (10 + 2 days), congestion (10 days) and TRAS (7 working days). Settlement of all weekly statements through a

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				common mechanism would avoid circular flow of money. Since congestion charge is accounted for in the National Pool, disbursement need not depend on actual receipt from the paying entity.
30.	**Reg 45(8)(a)** (second proviso) (Para 12(1) of Draft)	The words "including revision of already declared high inflow period, as required:" shall be added after the words "shall be notified by the respective RPC" in second proviso of sub-clause (a) of Clause (8) of Regulation 45 of the Principal Regulations.	In addition, a new proviso may be added. **Suggested clause:** *Provided further that RLDCs shall allow the hydro generating stations to declare ex-bus Declared Capacity more than 100% MCR less auxiliary power consumption limited to overload capability during flash flood or on any other appropriate justification provided by the power station on real time basis, to avoid spillage of water, for the day which is outside the period notified or revised by the respective RPC. Such details shall be submitted by RLDCs to the concerned RPCs.*	Due to flash floods or sudden rise in reservoir level, there are occasions when hydro power stations are required to declare ex-bus DC more than 100% MCR less auxiliary consumption, limited to overload capability, to avoid spillage of water in real time or on the day of scheduling. Such a period may not be included in the period notified by the RPC. RLDCs may be allowed to permit additional high inflow days on real-time basis, to avoid spillage and for optimum utilisation of water.
31.	**Reg 45(8)(a)** (new proviso) (Para 12(2) of Draft)	"Provided also that regional entity thermal generating stations shall not declare the declared capacity in the Peak hours less than declared capacity in the off-peak hours, other than in case of forced outage or partial outage, failing which declared capacity for such generating station for the purpose of fixed charges shall be taken as the lower of the two."	• **Basis of comparison:** The average peak-hour DC may be compared with the average off-peak-hour DC. • **Peak and off-peak hours:** Peak and off-peak hours should be considered as declared by RLDCs. • **Verification of partial outage:** Modalities may be specified for identifying such cases, issuing notice, checking documents and computing the DC to be considered for fixed charges.	DC is declared block-wise; the proviso does not say which two values are to be compared. Fixed-charge recovery is based on the average DC for peak and off-peak hours. Peak and off-peak hours are not defined in the Grid Code. Cases have been observed where stations declare lower peak-hour DC citing partial

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				outage, but do not furnish supporting records when asked.
32.	**Reg 45(16)** (Para 12(3) of Draft)	"(16) Regulation of access to defaulting entities: (a) In case of non-payment of dues of the statutory charges viz DSM charge, congestion charge, reactive energy charge payable under applicable Regulations by the entities or in case of non-maintenance of payment security mechanism, after the default trigger date, the scheduling of electricity for the defaulting entity shall be regulated as follows: (i) T-GNA, including already approved T-GNA, for the sale and purchase of electricity through short term contracts, including in the power exchange, shall be regulated entirely: Provided further that the NLDC may, under exceptional circumstances for grid security, temporarily review the regulation of T-GNA and record the reasons for doing so in writing. (ii) If, even two months after the regulation of the T-GNA, the dues remain unpaid, apart from the regulation of the short term contracts under T-GNA in its entirety, the short term contracts under GNA shall be regulated entirely. (iii) The reduction or withdrawal of access … shall be in such a manner that the quantum of reduction in drawal or injection	**Suggested clause:** *"(16) Regulation of access to defaulting entities:* *(a) In case of non-payment of dues of the statutory charges payable into the Deviation and Ancillary Services Pool Account or the National Pool Account (SCED) under the applicable Regulations, or in case of non-maintenance of the payment security mechanism for such charges, after the default trigger date, the scheduling of electricity for the defaulting entity shall be regulated as follows:* *(i) Short-term contracts, including already approved short-term contracts, for the sale and purchase of electricity, including through the power exchange, scheduled under T-GNA, shall be regulated entirely:* *Provided that the NLDC may, under exceptional circumstances for grid security, temporarily review the regulation of access and record the reasons for doing so in writing.* *(ii) If, even two months after the commencement of regulation of access under sub-clause (i), the dues remain unpaid, apart from the regulation of the short-term contracts under T-GNA in its entirety, the short-term contracts under GNA shall be regulated entirely.* *(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.*	• **Scope of charges:** Statutory charges related to the Deviation and Ancillary Services Pool Account and the National Pool Account (SCED), viz. DSM charge, congestion charge, reactive energy charge, ancillary services charge, SCUC charges including compensation, deficit recovery charges or any other charges notified by the Commission, and non-maintenance of payment security mechanism for such charges, should be covered. • **Generating stations:** Transactions of a interstate generating station are scheduled under its injection GNA or deemed T-GNA, even where the buyer side uses T-GNA or GNA. Applicability to a defaulting generating station or injecting entity, and to transactions under its GNA/deemed T-GNA, needs clarity. • **Procedure:** A procedure for notifying defaulting entities and implementing regulation of access is required.

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		schedule increases progressively by five per cent (5%) for each month of default. (b) Upon payment of outstanding dues or maintaining adequate Payment Security Mechanism, as the case may be, the regulation of access shall cease to operate, and access shall be restored at the earliest, but not later than one day, excluding the day on which payment is made.	*(b) Upon payment of outstanding dues or maintaining adequate Payment Security Mechanism, as the case may be, the regulation of access shall cease to operate, and access shall be restored at the earliest, but not later than one day, excluding the day on which payment is made.* *(c) In case of part payment by a Qualified Coordinating Agency, only those generating stations against which payments remain outstanding beyond the default trigger date, as confirmed by the concerned Qualified Coordinating Agency, shall be considered for regulation of access.* *(d) NLDC, in coordination with RLDCs, shall issue a Detailed Procedure on the implementation modalities for regulation of access, including notification of defaulting entities and its applicability to generating stations and injecting entities.*	• The first proviso is wrongly worded as "Provided further".
33.	**Regs 48 and 49 – RTM timelines** (Para 16(A) of Draft)	(A) First Phase of implementation: (1) The words "8th" shall be substituted with words "6th" in … Regulations 48 and 49 … (2)–(4) Revised RTM bid window 23.00–23.15 hrs; clearing till 23.30 hrs; NLDC finalisation by 23.40 hrs and RLDC by 23.45 hrs. [Para 1(2): effective from the date of publication in the Official Gazette]	The Hon'ble Commission may kindly allow a period of two months from the date of notification of the Second Amendment for implementation of Phase-I. **Suggested clause:** *In Clause (2) of Para 1, it may be provided that amendments under Para 16(A) shall come into force two months from the date of publication in the Official Gazette.*	GRID-INDIA appreciates the intent of the Hon'ble Commission to reduce the RTM timeline to bring it closer to actual delivery. Implementation involves operational, technical and system-level challenges; time is needed for system modifications, testing and coordination with stakeholders to ensure smooth implementation.
34.	**Reg 59(5)** (Para 17 of Draft)	"(5) The Central Electricity Regulatory Commission (Measures to relieve congestion in real time operation) Regulations, 2009 and all subsequent amendments, rate of congestion charge	**Suggested clause:** *… from the date of effectiveness of the CERC (Indian Electricity Grid Code) (Second Amendment), Regulations, 2026.*	Typographical error: the year of the amending regulations is given as 2025; it should read 2026.

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		and Procedures made thereunder shall stand repealed from the date of effectiveness of the CERC (Indian Electricity Grid Code) (Second Amendment), Regulations, 2025.		
35.	**Annexure-8** Appendix-I (Para 20 of Draft)	Column headings: L = J + K; O = L − (I + M); P = J − (I + N), with illustrative values for seven cases.	The formulae in the column headings and the figures in the table may be corrected.	• Column L (L = J + K) gives 120 + 440 = 560 MW, whereas the table shows 500 MW, which corresponds to I + K. • Column P (P = J − (I + N)) gives +20 MW in row 2 and +60 MW in row 5, whereas the table shows −20 MW and −60 MW (under-drawal). Either the formula should read P = (I + N) − J, or the signs in the table should be corrected. • The figures shown in Column O correspond to M − L, not to the formula printed in the heading. • In row 6, “880 W” should read “880 MW”.
36.	**Annexure-9** Para 3	3. For the time blocks in which generating station is required to be off-bar due to decomit, the schedules from such generating station as finalised up to Regulation 49(1)(k) of the Grid Code … shall be allowed to be revised by beneficiaries/buyers downwards only. No upward revision shall be permitted for such time blocks in which generating units are off-bar.	The clause may be clarified by specifying the reference schedule, or deleted.	Beneficiaries fill fresh requisitions every D-1 day based on the DC declared by the station. Since no minimum or maximum requisition is pre-filled, there is no reference value against which a “downward only” revision can be checked.

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37.	**Annexure-9** Para 4 and 4(a)	4. The schedule for the generating station(s) as finalized on day ahead basis for the time blocks during which the generating station is decided to be off-bar shall be adjusted through SCUC in the real-time prior to running SCED under Regulation 49(2)(a)(iv) as per following (a) SCUC-Down will be provided for the stations in the time blocks in which generating station is required to be off-bar	**Suggested clause:** *"(4) The schedule for the generating station(s) as finalized on day ahead basis for the time blocks during which the generating station is decided to be off-bar shall be adjusted through SCUC in real time prior to running SCED under Regulation 49(2)(a)(iv). SCED shall be run on the schedules so adjusted, while maintaining the reserve requirement assessed by NLDC.* *(a) SCUC-Down will be provided for the stations decommitted by NLDC in the time blocks in which such generating station is required to be off-bar."*	It should be explicit that commitment decisions and feasibility corrections (SCUC) come first, economic redispatch (SCED) follows, TRAS is despatched as necessary and AGC balances in real time around the SCED base point. SCED should preserve the reserves cleared and the earmarked requirement assessed by NLDC, so that economic redispatch does not use up headroom needed for AGC. SCUC-Down should be available only to stations decommitted by NLDC, so that other stations do not request it.
38.	**New Proposal** (Reg 19(2)(c) – Inter-change of power for REGS and ESS)	—	**Suggested clause:** *(c) Inter-change of power shall not exceed 45 (forty-five) days from the date of first time energization and integration (FTC) approval for REGS and ESS (except Hydro PSP ESS).*	Clause (2)(c) of Regulation 19 (as amended by the First Amendment) limits "injection of infirm power" for REGS and ESS to 45 days from FTC approval. ESS also draws power during this period. For consistency with Clause (3) as now amended, the words may be substituted with "inter-change of power".
39.	**New Proposal** (Reg 22 – Trial run of nuclear generating units)	—	A new sub-clause may be added in Regulation 22.	The Principal Regulations do not specify trial run requirements for nuclear generating units.

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			Suggested clause: *Trial Run of Nuclear Generating Unit: Trial run of a nuclear generating unit shall be carried out in accordance with the following provisions:* *(a) A nuclear generating unit shall be in continuous operation at MCR for seventy-two (72) hours on designated fuel:* *Provided that:* *(i) short interruption or load reduction shall be permissible with the corresponding increase in duration of the test;* *(ii) interruption or partial loading may be allowed with the condition that the average load during the duration of the trial run shall not be less than MCR, excluding the period of interruption but including the corresponding extended period;* *(iii) cumulative interruption of more than four (4) hours shall call for a repeat of trial run.* *(b) Where, on the basis of the trial run, a nuclear generating unit fails to demonstrate the unit capacity corresponding to MCR, the requester has the option to de-rate the capacity of the generating unit or to go for a repeat trial run. If the requester decides to de-rate the unit capacity, the de-rated capacity in such cases shall not be more than 95% of the demonstrated capacity, to cater for primary response.*	New nuclear plants, such as Small Modular Reactors (SMRs), can vary their output within their reactor design and approved operating limits. To begin with, a minimum requirement of continuous operation at MCR may be specified, with de-rating on the lines of thermal units. Where the reactor design permits, the capability to vary output may also be demonstrated through controlled changes in active power in response to set-point instructions, within safety constraints and approved operating procedures.
40.	**New Proposal** (Annexure-4 – Accounting and settlement of reactive energy charges)	—	The provision of Clause 14 of the IEGC 2010 on proportionate reduction of pay-outs may be restored. **Suggested clause:** *"In case the voltage profile of a regional grid improves to an extent that the total pay-out from the regional VAr charges account for a week exceeds the total amount being paid in for that week, and if*	Under the IEGC 2023, deviation and ancillary services, reactive energy exchanges and congestion charge are accounted in the Deviation and Ancillary Services Pool Account.

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			the regional reactive account has no balance to meet the deficit, the pay-outs shall be proportionately reduced according to the total money available in the above account." All weekly statements may also be settled through a common mechanism as per the Detailed Procedure for the National Deviation and Ancillary Services Pool Account submitted to the Hon'ble Commission.	The payment timeline for reactive energy (12 days) differs from other weekly statements (10 days), leading to circular flow of money between beneficiaries and pool. Under the IEGC 2010, in case of deficit in the regional reactive energy account, only the pay-in amount was distributed among pay-out entities on a pro-rata basis. This clause has been omitted in the IEGC 2023; the weekly deficit is being carried forward, contributing to significant deficit in the Pool Account. GRID-INDIA apprised the Hon'ble Commission of this vide letter dated 24.04.2026.
41.	**New Proposal** (Pumped storage plants – primary response assessment and availability)	—	**Suggested clause:** *"The primary response of Pumped Storage Plants shall be assessed through the Beta Factor in the manner applicable to other generating stations, as per the Detailed Procedure.* *The capacity of a Pumped Storage Plant deployed towards primary response and secondary reserve ancillary service shall be deemed to be available for assessing its availability for recovery of fixed charges."* A consequential amendment to the Tariff Regulations may be needed.	The draft adds PSP to droop and primary response provisions but does not extend the Beta Factor to PSP or address the effect of reserve provision on PSP availability. AGC has run at the 4 × 250 MW Tehri PSP since 12.03.2026; in under eight weeks the plant earned about ₹50 lakh through AGC incentives while providing only ±5% of its installed capacity (letter dated 29.09.2026). The draft CEA Connectivity Standards 2026 bring PSP within

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				their scope; PSP response values in the IEGC should be consistent with them once notified.
42.	**New Proposal** (Reg 49(4)(a) – Revision of T-GNA schedules)	— Existing proviso: "… Provided that scheduled transactions under T-GNA once scheduled cannot be revised other than in case of forced outage as per clause (7) of this Regulation or partial outage as per clause (7-a) of this Regulation."	Under Regulation 49 of the IEGC, 2023, a generating station or ESS selling power under bilateral transactions may revise its Declared Capacity in the following cases:(a) Forced outage – under Clause (7); and (b) Partial outage of a unit, change in fuel quality, water availability, gas supply, or any other recorded technical reason – under Clause (7-a), as introduced vide the First Amendment. However, while an entity drawing power from such a generating station under T-GNA can have its drawal schedule revised when the generating station has a forced outage, no such revision is permitted when the generating station has a partial outage. This creates a disparity between the revision of Declared Capacity by the generating station and the revision of the corresponding injection/drawal schedule under T-GNA. The Hon'ble Commission may, therefore, consider making the necessary regulatory changes to permit the corresponding revision of injection/drawal schedules under T-GNA in case of partial outage of the generating station.	

Note: Suggested clauses are shown in italics. "New Proposal" denotes suggestions on provisions not covered in the Draft Second Amendment.