GSECL

GUJARAT STATE ELECTRICITY CORPORATION LIMITED

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Ref.: GSECL/GM(F&A)/Comm./CERC/IEGC/ 1259 **Date:** 19 **.10.2026**

To,
Secretary,
Central Electricity Regulatory Commission (CERC),
6th, 7th & 8th Floor, Tower-B, World Trade Centre,
Nauroji Nagar,
New Delhi - 110029.

Sub: - Comments/suggestions of Gujarat State Electricity Corporation Limited (GSECL) on the Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026.

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

Respected Sir,

This has reference to the above Draft Notification of the Hon'ble Commission dt. 21.09.2026 inviting comments on the Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026.

GSECL is a Government of Gujarat undertaking and a State GENCO operating thermal, gas and hydro generating stations with an aggregate installed capacity of over 7,000 MW. GSECL thanks the Commission for the opportunity and submits its comments and suggestions.

GSECL supports implementation of Phase-1 of RTM bidding timelines (Para 16(A)) as proposed. For Phase-2 (Para 16(B), effective 01.04.2027), GSECL requests the Commission to kindly keep the RTM bidding window at the existing 15 minutes. The reasons are explained below. This request is limited to the bidding window.

Request: Under Phase-2 (Para 16(B)), the RTM bidding window may be kept at 15 minutes. Phase-1 (Para 16(A)) may go ahead as proposed.

The reasons for this request are as follows:

1. Large number of portfolios: GSECL runs thermal, gas and hydro stations and manages 19 separate portfolios on the Power Exchanges. Bids have to be entered portfolio by portfolio, because the ECR of each unit is different and bulk or single consolidated entry is not possible. Multiple bids have to be placed in the same window of 5 minutes. With a shorter window, it will be very difficult to enter all bids accurately in the time available.
2. No automated bidding system: GSECL does not have any automated or algorithmic bidding software linked to the Power Exchange platform. All bids are entered manually by designated officials. Though, GSECL is in process of implementing API based automated bidding, even after automation, bidding will rely on availability of

schedule data from SLDC portal, exchange platform, internet connectivity, disturbance in any of these will have a financial implication on the bidders.

3. Commercial impact: A missed or wrong entry can lead to non-offering of URS power. Under the LPSC rules, this results in deduction of fixed cost of the generator. An incorrect bid may also lead to DSM liability. It may also reduce market participation as the GENCOs with no automation wouldn't be able to place bids in time. This may work against the Commission's aim to increase participation and better liquidity in the market.

GSECL requests the Commission to kindly consider the above while finalising the Regulations, and to allow GSECL an opportunity of being heard, if a public hearing is held on the Draft Amendment.

GSECL is willing to provide any further information or clarification that the Commission may require.

With Regards,

For Gujarat State Electricity Corporation Ltd.,

Shubhadeep Sen
General Manager (F & A) & CFO

Copy f.w.c.s. to: -
MD, GSECL.