Ref No.: IEX/RA/034/26-27 **21st October 2026**

To,

The Secretary,
Central Electricity Regulatory Commission,
7th Floor, Tower B, World Trade Centre,
Nauroji Nagar, New Delhi- 110029

Sub: Comments and suggestions of Indian Energy Exchange Limited on the Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026

Dear Sir,

This is in reference to Public Notice No. L-1/265/2022/CERC dated 21.09.2026, inviting comments on the Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026 ("Draft Amendment Regulations"). Indian Energy Exchange Limited ("IEX") respectfully welcomes the proposal to shorten the timelines with respect to Real Time Market (RTM) scheduling and dispatch under Regulations 48 and 49 of the IEGC. The proposed phased reduction would enable scheduling closer to delivery, strengthen the RTM as a balancing mechanism and support secure integration of renewable energy.

Further, it is submitted that the Draft amendments provides for introduction of Regulation of access to defaulting entities wherein it is proposed that in case of non-payment of dues of the statutory charges viz DSM charge, congestion charge, reactive energy charge etc., the scheduling of electricity for the defaulting entity shall be regulated including already approved T-GNA, for the sale and purchase of electricity through short term contracts, including in the power exchange. While this provision will bring discipline, however this is to bring to your kind attention that the Hon'ble commission vide order dated 07th June 2022 in Petition No. 219/MP/2021 hold that the Power exchanges to strictly abide by the conditions of the non-transferable specific delivery (NTSD) contracts executed on its platform and the contracts executed on the Power Exchanges can only be annulled or curtailed, without any transfer of positions, due to constraints in the transmission system or due to force majeure; subject to the validation by system operator and default mechanism of the Exchange.

Therefore, it is humbly requested that the Hon'ble Commission may consider the above submission while finalizing the draft regulation regarding regulation of the Power Exchange contracts.

Yours Sincerely

Gaurav Maheshwari
Vice President – Regulatory Affairs