========== Forwarded message ==========
From: Secretary General - IWPA <secretary.general@windpro.org>
To: "Shri Sanoj Kumar Jha"<secy@cercind.gov.in>, <shilpa@cercind.gov.in>
Cc: "Secretary General - IWPA (Mohankumar)"<secretary.general@windpro.org>
Date: Wed, 21 Oct 2026 17:55:39 +0530
Subject: Submission of IWPA Comments on the Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026
========== Forwarded message ==========

Dear Sir,

We refer to your Public Notice No. L-1/265/2022/CERC dated 21.09.2026, inviting comments on the Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026.

The Indian Wind Power Association (IWPA) is pleased to submit its comments on the above draft regulations. The comments are attached herewith in PDF format for your kind perusal and consideration.

We request the Commission to kindly consider our comments favourably.

Best Regards,
M.Mohankumar,
Secretary General

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IWPA Comments on Draft CERC (IEGC) (Second Amendment) Regulations, 2026

Sl. No	Draft Regulation	Suggestions
1	**Regulation 19: Extension of Interchange of Power for REGS** **Proposed Amendment** RLDC may grant multiple extensions within an aggregate ceiling of three months beyond the initial 45-day interchange period.	**Suggested Comment** The proposed amendment is welcome. However, the cumulative cap of three months may be insufficient in cases where delay in commissioning arises from factors beyond the control of the generator such as: • Delay in readiness of ISTS evacuation system. • Transmission constraints. • Force majeure events. • Delay in approvals by statutory authorities. • Curtailment or restrictions imposed by RLDCs. **Suggested Modification** Add the following proviso: "Provided that where delay is attributable to transmission system unavailability, force majeure or any reason beyond the control of the generating station, the Commission or RLDC may grant further extension on case-to-case basis." **Rationale** This would avoid loss of connectivity rights and unnecessary hardship to RE projects.
2	**Regulation 22: Trial Run in Instalments** **Proposed Amendment** Projects of 250 MW and above may undertake trial runs in unlimited instalments with minimum 50 MW blocks.	**Suggested Comment** This is a positive amendment and should be extended to projects above 100 MW also. **Reason** Modern RE projects are commissioned in phased manner due to: • module supply schedules,

		• inverter block commissioning, • pooling station readiness, • transmission corridor availability. Restricting unlimited instalments only to projects above 250 MW creates unnecessary distinction. **Suggested Modification** Replace: "250 MW or more" with "100 MW or more".
3	**Demonstration of Rated Capacity Due to Transmission Constraints** **Proposed Amendment** One year from GNA effectiveness or COD, whichever later	**Suggested Comment** The amendment addresses a genuine issue but remains incomplete. **Concern** The explanatory memorandum itself recognizes several factors beyond the control of generators: • RLDC curtailment, • insufficient transmission availability, • outage of transmission elements, • ROW issues, • weather abnormalities. However only transmission constraints are covered. **Suggested Modification** Expand Regulation 22(3)(j): "...due to transmission constraints, curtailment instructions, force majeure, grid security restrictions or any other reasons beyond the control of the generating station..."
4	**Separate COD Declaration from PPA**	**Suggested Comment**

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	Conditions **Proposed Amendment** COD under Grid Code may be declared independent of PPA conditions	The intent is appreciated. However, clarification is needed that: Declaration of COD for Grid Code purposes shall not prejudice contractual rights under the PPA concerning SCOD, delay damages, capacity utilization or commissioning milestones. Without such clarification disputes may arise between developers and procurers.
5	**Regulation 25A: Treatment of Infirm Power** **Proposed Amendment** Generator shall first offer infirm power to contracted buyers; only after refusal may it sell outside the contract.	**Concern** This provision could delay monetization of infirm power. For RE projects: • infirm energy windows are often short, • resource availability is uncertain, • buyer response may not be immediate. Seven-day notice may effectively destroy market opportunities. **Suggested Modification** Reduce notice period from: 7 days to 2 days for REGS. Alternatively: Deemed refusal after 48 hours. **Rationale** RE energy is weather dependent and cannot always be forecast a week in advance
6	**Primary Frequency**	**Suggested Comment**

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	Response Requirement **Proposed Amendment** PRAS/Frequency controller requirements extended to ESS and PSP. WS sellers continue to be governed by CEA standards	Any future application of Primary Frequency Response obligations to wind and solar generators should remain aligned strictly with CEA Connectivity Standards. **Additional Recommendation** The Commission may clarify that: **No additional hardware retrofitting requirement shall be imposed on commissioned wind and solar plants unless supported by compensation framework.**
7	**Regulation 30A: Congestion Charge** **Major Area of Concern** The new congestion charge is proposed in addition to DSM charges.	**Concern** Wind and solar generators frequently face: • transmission constraints, • corridor congestion, • curtailment instructions. At times a deviation may arise because: • evacuation path is unavailable, • RLDC curtailment instructions are issued, • schedules are affected due to transmission outages. Imposing both: • DSM charge, and • congestion charge could amount to double commercial exposure. **Suggested Amendment** Add proviso: "Congestion charges shall not be applicable where deviation arises due to transmission constraints, RLDC instructions, grid security curtailment or force majeure."

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		Additional Comment RE generators should not be treated as entities "causing congestion" merely because actual generation differs from forecast under variable weather conditions
8	**Reserve Estimation Methodology and Bulk Consumer Obligations** **Proposal** Reserve obligations expanded and methodology made more dynamic.	**Suggested Comment** The revised reserve methodology should recognize contribution of: • Wind Forecasting, • Solar Forecasting, • BESS, • Hybrid projects. **Recommendation** A portion of reserve requirement may be offset by: • collocated storage, • hybrid flexibility, • qualified forecasting performance. This would incentivize investment in storage-backed renewable projects
9	**RTM Timeline Compression** **Proposal** Revision effectiveness reduced from 7th/8th block to 6th/7th block and eventually 5th/6th block	**Suggested Comment** While shorter timelines improve market efficiency, RE generators require: • high quality weather forecasts, • forecasting software integration, • automated scheduling tools. The proposed Phase-II should be implemented only after certification of: • WBES readiness, • NOAR integration, • API interoperability.

		Suggested Addition "Phase-II implementation shall be subject to review of operational experience under Phase-I."
10	**Regulation 45(16): Restriction on Access for Payment Defaults**	**Concern** Reduction in injection schedule for payment defaults could unintentionally affect contracted renewable generation. **Suggested Modification** The following may be added: "No reduction in generation schedule shall be imposed where such reduction would adversely impact renewable purchase obligations or must-run renewable generation, except where grid security considerations so require."