========== Forwarded message ==========
From: India Energy Atlas (energymap.in) <deepali@energymap.in>
To: <secy@cercind.gov.in>, <shilpa@cercind.gov.in>
Date: Mon, 19 Oct 2026 10:07:18 +0530
Subject: Comments on draft CERC (IEGC) (Second Amendment) Regulations, 2026 - Public Notice No. L-1/265/2022/CERC - India Energy Atlas
========== Forwarded message ==========

To:

The Secretary
Central Electricity Regulatory Commission
New Delhi

Subject: Comments on draft CERC (IEGC) (Second Amendment) Regulations, 2026 - Public Notice No. L-1/265/2022/CERC - India Energy Atlas

Respected Sir/Madam,

Kindly find attached the comments of India Energy Atlas on the draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026, in response to the Public Notice dated 21 September 2026.

India Energy Atlas is a research programme of the Council for Independent Frontier Research (CIFR), a not-for-profit company registered under Section 8 of the Companies Act, 2013.

The submission contains seven suggestions for the Commission's kind consideration, in three groups:

1. drafting clarifications,
2. implementation safeguards, and
3. public data for the implementation procedures.

India Energy Atlas would be glad to assist the Commission and NLDC in any way considered useful.

We would be grateful for an acknowledgement of receipt.

With respectful regards,

Dr. Sayonsom Chanda
Co-Director,
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India Energy Atlas
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SUBMISSION TO CERC · OCTOBER 2026

Comments on the draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026

Submitted by India Energy Atlas, a research programme of the Council for Independent Frontier Research (CIFR), in response to Public Notice No. L-1/265/2022/CERC dated 21 September 2026

Summary

INDIA ENERGY ATLAS IS grateful to the Commission for the opportunity to comment on the draft Second Amendment. India Energy Atlas is a research programme of the Council for Independent Frontier Research (CIFR), a not-for-profit company registered under Section 8 of the Companies Act, 2013. The programme studies electricity data and forecasting for India.

India Energy Atlas supports the proposal to bring scheduling and the Real-Time Market closer to delivery. Seven suggestions are respectfully submitted for the Commission's kind consideration. They are arranged in three groups:

- Drafting clarifications (Suggestions 1 and 2)
- Implementation safeguards (Suggestions 3 to 5)
- Public data for the implementation procedures (Suggestions 6 and 7)

India Energy Atlas uses published grid data in its research and therefore has an interest in Suggestions 6 and 7. It does not seek preferential access, market participation, or access to confidential bids or control systems. These comments cover draft paragraphs 1, 10, 11, 16, 17 and 18 only.

EXHIBIT 1 **Summary of suggestions**

SUGGESTION	DRAFT REFERENCE	PURPOSE
1. Set out the full text of Regulations 48 and 49 for each phase	Para 16(A), 16(B); Regs 48, 49	One clear timetable per phase
2. Correct the year in Reg 59(5); publish congestion notices in structured form	Para 17(1), proposed Reg 59(5); para 11, proposed Reg 30A	Clear transition and traceable charges
3. Shadow testing and a readiness report before each phase	Para 1(2), 1(3), 16	Faults found before live operation
4. Publish the reserve method and aggregate results	Para 10(5)-(9), 18	Entities can check their allocations
5. Common timestamps and revision identifiers	Para 16; NLDC procedure	Records match across systems
6. A catalogue of non-confidential data, published on equal terms	Para 16; implementation procedures	Users can find approved data
7. Retain first-published and corrected versions	Para 16; implementation procedures	Forecasts can be evaluated fairly

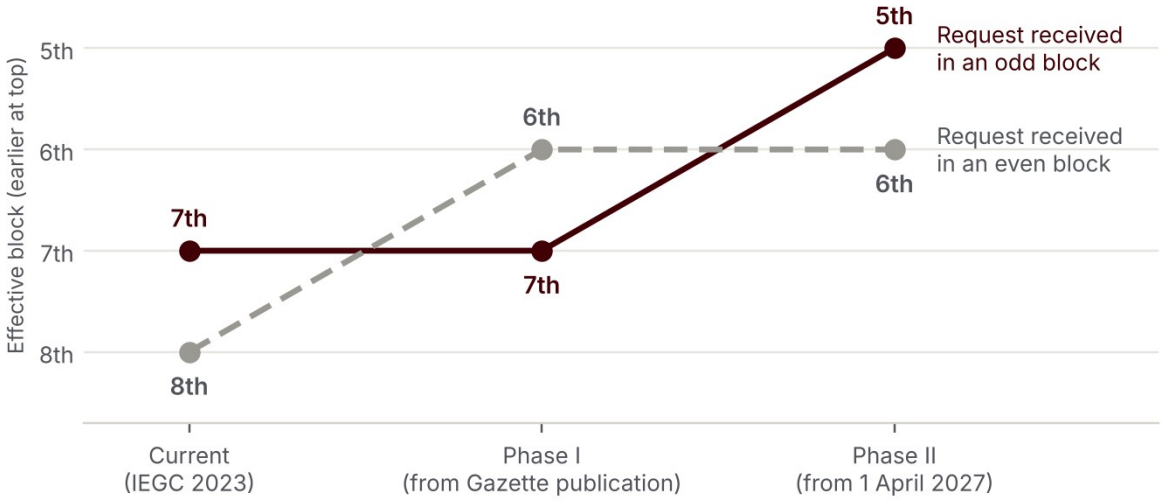
Source: India Energy Atlas, based on the draft Second Amendment Regulations, 2026.

Drafting clarifications

Suggestion 1: One complete timetable for each phase

DRAFT PARAGRAPH 16(A)(1) replaces references to the eighth time block with the sixth. Draft paragraph 16(B)(1) replaces references to the seventh time block with the fifth. The receipt block is counted as the first block. Exhibit 2 shows the result as described in EM section 20.16.

EXHIBIT 2 **Time block from which a revision takes effect, counting the receipt block as block 1**



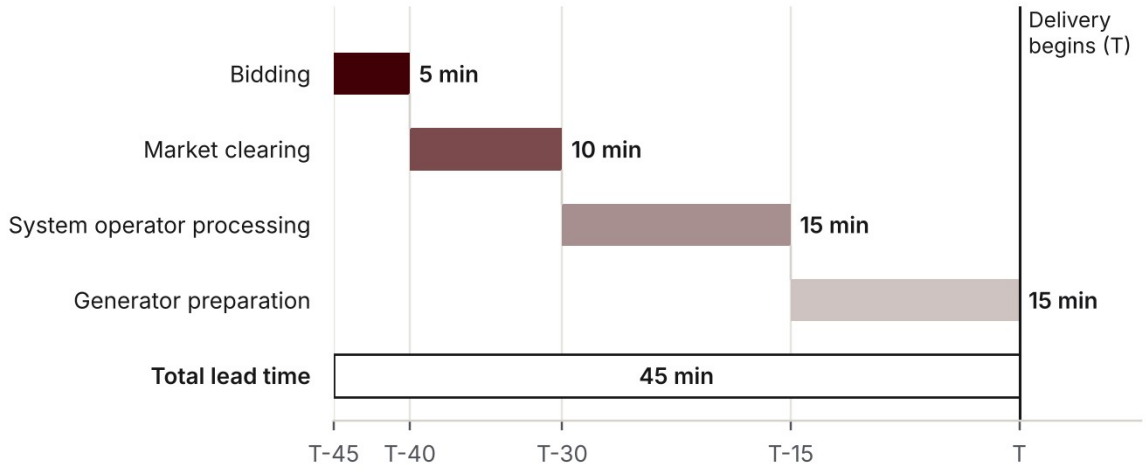
Source: IEGC 2023, Regulation 49(4)(c); draft paragraphs 16(A)(1) and 16(B)(1); Explanatory Memorandum, section 20.16.

The clock-time changes also interact. Draft paragraph 16(A)(2) changes 22.45 to 23.00 in Regulation 49(1)(q)(ii). Draft paragraph 16(B)(2) then seeks to replace 22.45 again. Draft paragraph 16(B)(3) targets 23.00 in Regulation 49(1)(q)(iv) after Phase I has changed that text.

The Commission may kindly consider setting out the full applicable text of Regulations 48 and 49 for each phase, with Phase II expressly replacing Phase I. Worked examples for odd blocks, even blocks, midnight and outages would help all users apply the same deadlines.

Exhibit 3 shows the Phase II Real-Time Market sequence described in EM section 20.11. It may kindly be clarified that the five-minute window applies to bidding only. EM Table 2 labels delivery as blocks X and X+1 but shows T to T+15. Kindly reconcile this with the half-hour delivery period in Regulation 49(1)(q)(ii).

EXHIBIT 3 **Phase II lead time before delivery, by stage (minutes)**



Source: Explanatory Memorandum, section 20.11 and Table 2.

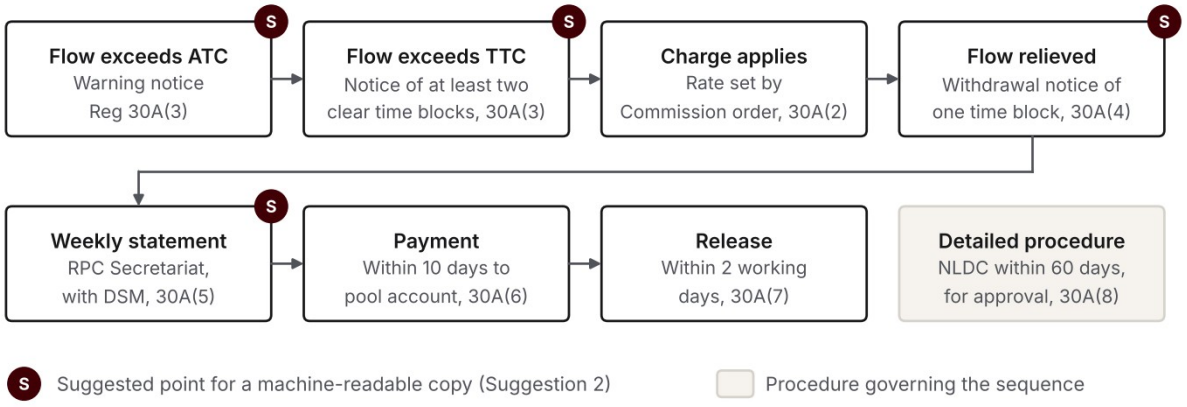
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Suggestion 2: Regulation 59(5) and congestion notices

IN DRAFT PARAGRAPH 17(1), proposed Regulation 59(5) refers to the "Second Amendment, Regulations, 2025". Kindly consider correcting the year to 2026. The repeal may also be made expressly subject to the savings in proposed Regulations 59(6) and 59(7).

Under proposed Regulation 30A, notices of application and withdrawal of congestion charges will be issued in real time (Exhibit 4). It is respectfully suggested that the procedure under Regulation 30A(8) may also provide for a machine-readable copy of each notice. Each copy could carry a notice identifier, issue time, corridor and direction, control area, rate reference, effective time block and supersession status. The structured copy would supplement the operational notice and would not delay it. Worked examples for simultaneous import and export congestion would assist entities.

EXHIBIT 4 **Congestion charge sequence under proposed Regulation 30A**



Source: Draft paragraph 11(1), proposed Regulation 30A(3) to 30A(8).

Implementation safeguards

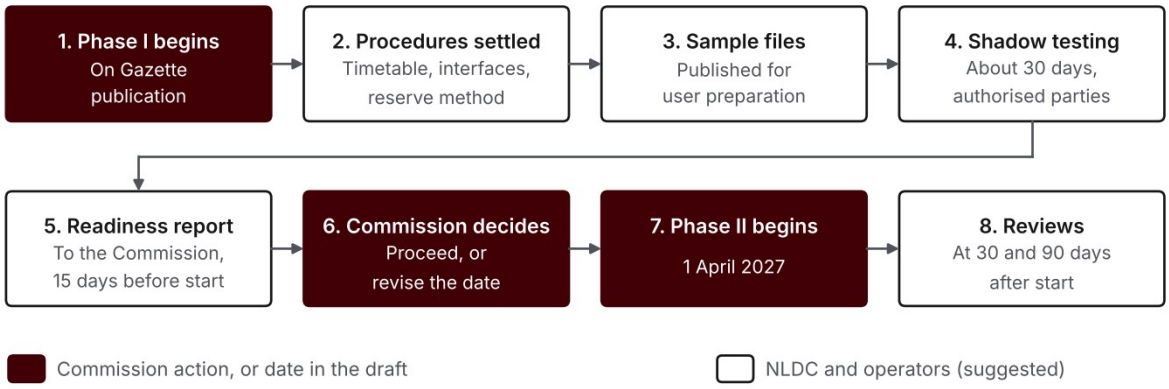
Suggestion 3: Readiness before each phase

DRAFT PARAGRAPH 1(2) provides for Phase I to begin on publication in the Official Gazette. Draft paragraph 1(3) sets 1 April 2027 for Phase II. India Energy Atlas supports the 1 April 2027 date as a common planning target.

The Commission may kindly consider directing NLDC to coordinate end-to-end testing with RLDCs, SLDCs and Power Exchanges before each phase, and to submit a readiness report. A non-sensitive summary of the report could be published. Testing could cover peak load, renewable ramps, delayed and duplicate messages, clock drift and communication outages. The duration of shadow testing may be set by NLDC; a period of about thirty days before Phase II is suggested for consideration. Any change to a

commencement date would be made by the Commission. Exhibit 5 sets out one possible sequence.

EXHIBIT 5 **Possible sequence for the Phase II transition**



Source: India Energy Atlas suggestion. Periods shown are illustrative and for the Commission's consideration.

Suggestion 4: Reserve estimation and allocation

DRAFT PARAGRAPH 10(5) permits a methodology using a percentile other than the 99th. Draft paragraph 10(6) adds quarter-ahead assessment. Draft paragraphs 10(7) to 10(9) and 18 extend provisions to regional entity bulk consumers.

The Commission may kindly consider requiring the approved methodology to state its data windows, quality screening, percentile selection, treatment of exceptional events and allocation formula. NLDC could publish aggregate quarter-ahead estimates and explain material changes. Each obligated entity could receive the calculation for its own allocation, with a process for correction. Forecast error, ramp needs and reserve adequacy may be reviewed separately before any percentile is changed.

Suggestion 5: Timestamps and interfaces

THE IMPLEMENTATION PROCEDURE may kindly specify common formats, units, identifiers and clock synchronisation. Each record could show the delivery block, session, issue time, publication time, revision identifier and the record it replaces. Public interfaces would remain separate from operational control systems. Failure of a public feed would not affect dispatch.

Public data for the implementation procedures

THESE TWO SUGGESTIONS MAY fall outside the direct scope of the present amendment. They are submitted for consideration in the implementation procedures or other instruments, as the Commission considers appropriate. They are consistent with the Ministry of Power's India Energy Stack initiative, which aims at

interoperable data exchange in the power sector. Suggestions concerning Power Exchange data may be more suitable under the CERC (Power Market) Regulations, 2021.

Suggestion 6: A catalogue of approved public data

NLDC, IN CONSULTATION WITH stakeholders, could prepare a catalogue of non-confidential scheduling and market data for the Commission's approval. The catalogue could state the publisher, fields, granularity, publication time, permitted uses and retention period of each dataset. A modest start is suggested, using data already approved for publication: market clearing prices and volumes, transmission margins, aggregate demand and renewable generation, and congestion notices. Approved data could be available as documented downloads on equal terms to all users. Confidential bids, commercial terms, personal data and protected telemetry would remain excluded.

Suggestion 7: Retention of published versions

PUBLISHERS COULD RETAIN each public record as first published, together with any corrections. Each version would show its issue time and the version it replaces. This would allow forecasts to be evaluated against the information available at the time. Retention periods could be set after consultation on cost and feasibility.

Offer of assistance

INDIA ENERGY ATLAS WOULD be glad to assist the Commission and NLDC in any way considered useful, including through stakeholder consultation on the Regulation 30A(8) procedure, the data catalogue and the testing plan. It could also share its forecast evaluation method and prepare sample files for testing.

We thank the Commission for its consideration and remain at its disposal for any clarification.

Submitted by

RESPECTFULLY SUBMITTED ON behalf of India Energy Atlas by its co-directors.

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Dr. Deepali Jain, Co-Director, Council for Independent Frontier Research and India Energy Atlas Programme. Email: deepali@energymap.in

India Energy Atlas, a research programme of CIFR (Section 8 company, registered as CIFR Frontier Research Council). hello@energymap.in, +91 87928 77432, energymap.in

References

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2. Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026. https://www.cercind.gov.in/2026/draft_reg/DR_IEGC-2ndAmnd.pdf
3. Explanatory Memorandum to the draft. https://www.cercind.gov.in/2026/draft_reg/EM_IEGC-2ndAmnd.pdf
4. CERC (Indian Electricity Grid Code) Regulations, 2023. https://www.cercind.gov.in/Regulations/180-Regulations.pdf
5. CERC (Indian Electricity Grid Code) (First Amendment) Regulations, 2024. https://www.cercind.gov.in/regulations/193.pdf