JINDAL INDIA POWER LIMITED

Regd. off: Habitat India, C-3, Qutab Institutional Area,

Katwaria Sarai, New Delhi- 110016, Phone: 011-40841950

Website: www.jitpl.com.

Ref: JIPL/CERC/Oct'26/16/160 **Date: 16.10.2026**

To
The Secretary
Central Electricity Regulatory Commission
Tower B, 6,7,8 Floor, World Trade Centre,
Nauroji Nagar Market, Block G, Nauroji Nagar, Safdarjung Enclave,
New Delhi, Delhi 110029

Subject: Comments/Suggestions on Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026

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

Respected Sir,

With reference to the above draft regulations, we would like to submit the following comments and suggestions on behalf of Jindal India Power Limited (JIPL) for your kind consideration.

1. Para 12(2) – Declared Capacity (DC) During Peak and Off-Peak Hours

As per the proposed amendment, thermal generating stations shall not declare lower DC during peak hours compared to off-peak hours, except in cases of forced outage or partial outage.

In this regard, we would like to highlight the following concerns:

a) Applicability of Peak and Off-Peak Hours for Multiple PPAs

A generating station may have multiple PPAs with beneficiaries located in different regions.

For example, a generating station located in the Eastern Region may supply power to beneficiaries in the Northern, Southern and Western Regions, where peak and off-peak hours may be different.

In such cases, it is not clear which region's peak and off-peak hours shall be considered for DC declaration.

We therefore request the Hon'ble Commission to kindly clarify whether the peak and off-peak hours of the generating station's region or those of the beneficiaries' respective regions shall be applicable.

2. Para 16 – Reduction in Scheduling and Revision Timelines

Under Para 16, the Hon'ble Commission has proposed reducing the timelines for schedule revisions in a phased manner.

While we appreciate the objective of improving scheduling efficiency, the proposed reduction may create practical difficulties for generating stations, as many scheduling activities are currently being carried out manually.

Generating stations need sufficient time to check available capacity, verify beneficiary schedules, coordinate with plant operation teams, prepare market bids and submit necessary schedule revisions.

Further, sudden changes in plant operating conditions, communication delays and technical issues may make it difficult to complete these activities within the proposed timelines.

The reduced timelines may also increase the chances of scheduling errors and affect participation in the Real-Time Market (RTM) and ancillary services markets.

Therefore, we request the Hon'ble Commission to kindly consider the following:

1. Adequate automation systems should be developed for scheduling and market bidding activities across generating stations, power exchanges, trading licensees and system operators.
2. Proper integration of scheduling platforms should be ensured so that DC, beneficiary schedules and market obligations can be exchanged automatically without manual intervention.
3. Sufficient time should be provided to all stakeholders for developing, testing and implementing the required automation systems.
4. The proposed reduced timelines should be implemented only after ensuring that the automation systems are fully operational and reliable.

Accordingly, we request the Hon'ble Commission to kindly **continue with the existing scheduling and revision timelines until the necessary automation systems are developed, tested and implemented across all concerned stakeholders.**

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We also request the Hon'ble Commission to kindly arrange a stakeholder meeting to discuss the above operational concerns before finalising the proposed amendments.

We request the Hon'ble Commission to kindly consider our comments and suggestions while finalising the regulations.

Thanking you,

Yours faithfully,
For Jindal India Power Limited

JINDAL INDIA POWER LIMITED

Authorized Signatory

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