JHABUA
POWER

Ref No. JPL/BD/CERC/2026/02 **30.10.2026**

To,
The Secretary
6th, 7th & 8th Floors, Tower B, World Trade Centre,
Nauroji Nagar, New Delhi- 110029

Sub: Jhabua Power Ltd's comments on Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026.

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Dear Sir,

Please find attached comments on Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026. for kind consideration of Hon'ble Commission.

Thanking You,
Yours faithfully,

30.X.26

Vinod Kumar Jain
GM-Commercial
Jhabua Power Ltd- JV of NTPC Ltd

Jhabua Power Ltd (JPL)
Comments on Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026

Please find herewith Jhabua Power Ltd's (JPL) comments on Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026:

Sl no	Clause no	Remarks
1	Regulation 47 Clause (2) (c) of IEGC, 2nd Amendment	**Proposed Clause:** (*c) In the special case of a generating station where the only running machine is going under USD, the beneficiaries who have requisitioned power will not get any power from that generating station."* **Modified Clause**: (*c) In the special case of a generating station where the only running machine is going under USD,* ***the generating station may be allowed to serve the beneficiaries by purchasing power from alternate source mechanism including Power market for contracts under Section-63 (Medium Term/Short Term).*** **Rationale***:* • The provision for serving beneficiaries through the power market during Unit Shut Down (USD) is intended to ensure declaration of availability for recovery of fixed cost, continuity of electricity supply and to preserve the contractual and regulatory rights of beneficiaries who had requisitioned power prior to the generating unit being placed under USD. • Since the shutdown of a generating unit does not, by itself, absolve the generating company of its obligation to honour such requisitions, the generating company is required to arrange the requisite power through market-based contracts or from another generating station, in accordance with the applicable regulatory framework. • Accordingly, market-based procurement during USD may be viewed as an alternative mechanism for discharging the existing supply obligation, rather than as a dilution or extinguishment of the generating company's obligation towards its beneficiaries.
2	Regulation 48(3)(f) - Replacement of Thermal Power with REGS	**Draft Amendment proposed**: In case of a generating station other than whose tariff is determined by the Commission under Section 62 of the Act, supply of power by such generating station to its buyer from an alternate source in terms of sub-clauses (a) to (d) of this clause shall be in accordance with the contract with the buyer and in the absence of a specific provision in the contract, **with the express consent of the buyer (which may be in form of a**

		standing consent) and in terms of mutual agreement on sharing of net savings between the generating station and the buyer. **Requested Modification:** In case of a generating station other than whose tariff is determined by the Commission under Section 62 of the Act, supply of power by such generating station to its buyer from an alternate source in terms of sub-clauses (a) to (d) of this clause shall be in accordance with the contract with the buyer and in the absence of a specific provision in the contract, **with prior intimation to the buyer and in line with the guidelines of Ministry of Power, GoI on sharing of net savings between the generating station and the buyer**. **Additional Comment** Further a suitable methodology for calculation of sharing of net savings between the generating station and the buyer may please be incorporated in Regulation by the Hon'ble Commission. **Rationale**: • Making replacement dependent on a "mutual agreement on sharing of net savings" can effectively defeat the objective of facilitating renewable substitution. In several long-term Section 62 PPAs, beneficiaries may withhold consent or delay negotiations on gain sharing even where the replacement is economically beneficial to all stakeholders. • Further, neither IEGC nor Tariff Regulations presently prescribe a methodology for determination or sharing of net savings arising from such replacement under Section 62 arrangements. Hon'ble CERC is requested specify the gain sharing framework to avoid any ambiguity and facilitate blending of RE power upto the maximum extent.
3	**Regulation 49(4)(b)(ii)**	**Existing Clause**: The proviso under sub-clause (b)(ii) of Clause (4) of Regulation 49 of the Principal Regulations, introduced vide the First Amendment, states as: *"Provided that downward revision of schedules by the buyers for 'D' day, after 1430 hrs on 'D-1' day in the generating station is permissible only for beneficiaries which have scheduled above their respective share of minimum turndown level in the generating station."* **Requested Modification:** *"Provided that downward revision of schedules by the buyers for 'D' day, even during 'D-1' day, in the generating station is permissible only for beneficiaries which have scheduled above their respective share of minimum turndown level in the generating station, such that the minimum turndown level of the station is maintained."*

		Rationale: The proviso was introduced vide the First Amendment to protect the generating station from a schedule falling below its technical minimum. It allows a beneficiary to revise its schedule downward after 1430 hrs on D-1 only to the extent that the beneficiary is scheduled above its share of the station's MTL. The station can then run at or above MTL, and the schedule remains technically feasible. However, it is observed that some beneficiaries are circumventing this intent in the following manner. • Full requisition at 0800 hrs on D-1. The beneficiary provides its full requisition at 0800 hrs on D-1 (or as per the applicable timeline). No un-requisitioned surplus (URS) then remains with the generating station to offer in the Day-Ahead Market (DAM). • At 1400 hrs, when revision is permitted, the beneficiary revises its schedule to zero. • The MTL restriction in the proviso applies only to revisions made after 1430 hrs, so a revision to zero made before 1430 hrs is not covered by it. Such scheduling behaviour may result in avoidable loss of market participation for the generating station and may also result in the station being scheduled below a technically sustainable operating level. Accordingly, the Commission may consider providing appropriate safeguards so that downward revision of requisition by beneficiaries on D-1 does not result in the generating station being scheduled below its minimum turndown level after expiry of the relevant market-offering opportunity.
4	Regulation 45 (16) (iv) of IEGC, 2nd Amendment Regulation of access to defaulting entities:	The following new clause may please be added after clause 16 (a) (iii) of Draft Amendment to Regulation 45: **Proposed Addition**: (iv) *In case of curtailment of drawl schedule of defaulting entities by RLDC, the defaulting entities shall be additionally obligated to pay to the applicable compensation as per the PPAs in case of deviation by more than permissible limits in scheduled off-take quantum..* **Rationale**: Short Term Tenders allows the 15% deviation in schedule on either party i.e. Generator/Utility. In case of deviation more than permissible limits i.e. 15% , Compensation is applicable @ 20% of the tariff. In TAM contracts, 100% penalty is

		leviable in case of any default in supply obligations. Therefore, deviation due to curtailment shall also be applicable for compensation in case of deviation more than permitted deviation.
5	Clause 48 & 49 of IEGC, 2023- (B) Second Phase Implementation	**<u>Proposed Amendment in Implementation in Phase-II</u>** Under the proposed RTM timeline, all entities would be given 5 minutes for bidding in implementation of Second Phase, as it is felt that with automation, bidding operations can be performed more quickly and precisely, and a 5-minute window would be sufficient to complete the tasks. The window for trade shall open from 23.15 hrs to 23.20 hrs of (D-1, considering D as the delivery day), for the delivery of power for the first two time blocks of 1st hour of day (D), i.e., 00.00 hrs to 00.30 hrs, and will be repeated thereafter **<u>Modified Change</u>** It is suggested not to change the RTM Bidding timeline and maintain the 15 minute window as is currently existing and applicable for Phase-1 implementation . The relevant clause to be revised as follows: "……..Under the proposed RTM timeline, all entities would be given **<u>15 minutes</u>** for bidding……." **<u>Rationale</u>***:* **Multiple beneficiaries and non-automated systems**: Many generating stations have combination of power tie-ups under Sec-62 as well as Sec-63 with multiple beneficiaries. Shortening of RTM timeline will result into following issues: (a) Each beneficiary has independent right to revise and punch schedules on the web-based scheduling portal. Consequently, beneficiaries generally submit revised schedules at the last minute and post such revision, same shall be reflected at WBES Portal. Further, any quantum not requisitioned by beneficiaries has to be placed in DAM/RTM as per LPS rules, 2024. (b) In such situations, generator gets very limited time (only approx. 2 minutes after gate closure and SG updation on WBES portal) to assess the available Un-Requisitioned Surplus (URS) power and place bids on the Power Exchange in the RTM segment. Kindly, refer the following scenario wherein impact of reducing the timeline is reflected:

RTM Auction Start Time	RTM Auction EndTime	RTM clearing Interval and publication on the website	Final schedule Preparation & Communication of schedule to NRLDC/RLDC/SLDC	Final schedule Preparation	Preparation time for despatch	Delivery Period
22:45	23:00	23:00-23:15	23:15 - 23:30	23:35 -23:45	23:45 - 24:00	00:00 - 00:30

Current Timeline of RTM

Gate Closure for schedule revision takes place at 22:45.

In present case, if LTA/MTOA Beneficiary revises schedule before Gate closure at 22:45 (for delivery 00:00-00:30Hrs), then updated Schedule on WBES is reflected at around 22:48 hrs. It has been observed that there is generally a lag of 3 minutes before revised schedule is reflected at WBES. In existing scenario, generator still has sufficient time available to assess such schedule revisions & place the bid accordingly.

Revised Timeline of RTM

RTM Auction Start Time	RTM Auction End Time	RTM clearing Interval and publication on the website	Schedule Preparation and Communication	Delivery Period
23:15	23:20	23:20 - 23:30	23:30 - 24:00	00:00 -00:30

Gate Closure for schedule revision takes place at 23:15.

In the revised scenario, if LTA/MTOA Beneficiary revises schedule before gate closure takes place at 23:15 (for delivery 00:00-00:30Hrs), then updated schedule on WBES is reflected at around 23:18 hrs. Thus, generators will get only 2 minutes to place the bid.

An illustration of 5 minute trading window is attached as Annexure-1.

Due to reduction in timeline, there can be situation(s) where bids are placed by generators before WBES Portal is updated and this can lead to placing of excess bids (where SG exceeds DC) and consequent levy of substantial DSM penalties. This will in-turn jeopardise the grid security as well.

(c) Further, not all generators are using automated software for placing the bids. Manual bid placing can be more time taking due to multiplicity of beneficiaries or due to technical glitches while placing the bids. Also, such URS power bids are required to be placed separately for each beneficiary under their respective portfolio created by the Power Exchanges. This arrangement is necessary to ensure that the URS power offered in the market correctly reflects the actual beneficiary-wise position and enables

		appropriate recovery of fixed charges at the billed rate. Reduction of RTM bid submission window can lead to situations where generators are often unable to complete the beneficiary-wise URS assessment and preparation/ submission of bids within the stipulated timeline. As a result, generators maybe unable to participate effectively in the RTM, leading to loss of opportunity for optimal sale of surplus power, inefficient market participation, and possible under-recovery of fixed charges. (d) **Further, as on date, for many IPPs having Merchant Capacity, even the station Ramp rate is not linked for each beneficiary and IPPs are managing under/Over-Injection by placing the bids through RTM to avoid such over/under injection.** Hon'ble Commission is requested to direct the system operator to align the scheduling software to cater to the requirement of all the combinations of contracts/Merchant plants before implementation of new timelines of RTM bidding proposed in the staff paper. (e) Also, different SLDCs are involved in the process for inter-regional power transfer/exchange and in the real time, significant time is lost whenever there is any Unit tripping/Emergency and in such situations, any further reduction in bidding timeline from present 15 min to 5 min may lead to increase in disputes and will result into financial loss to generators. The situation becomes complex for Merchant plants having multiple tie-up across various regions throughout the country.

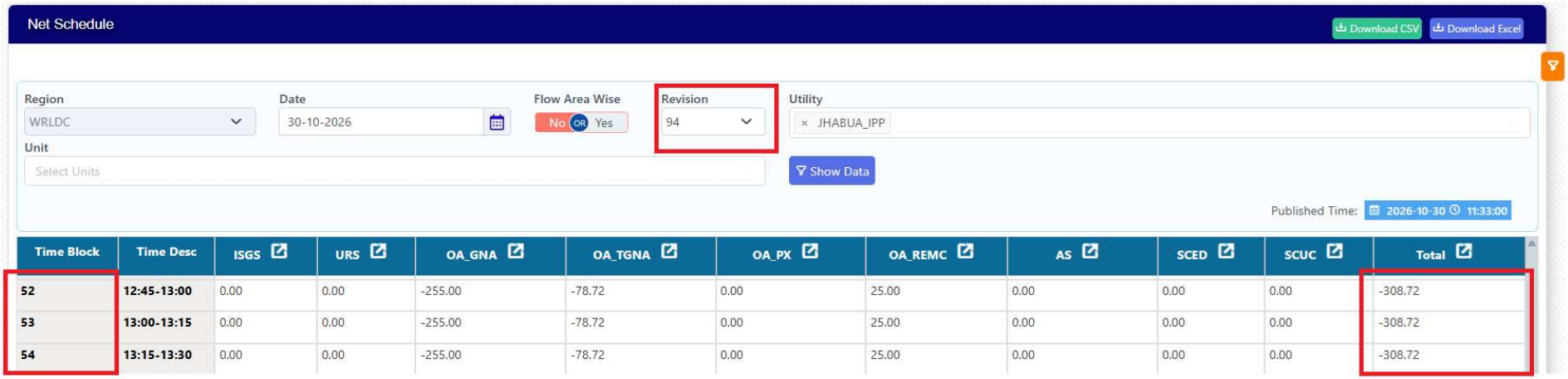
6	Clause 48 (1) (ii) of IEGC, 2023- Scheduling from Alternate Source of Power Additional Comment	**Existing Clause:** *(1) A generating station may supply power from alternate source in case of (i) USD in terms of clause (1) of Regulation 47 of these regulations or **(ii) forced outage of unit(s)** or (iii) a generating station other than REGS replacing its scheduled generation by power supplied from REGS irrespective of whether such identified sources are located within or outside the premises of the generating station or at a different location.* **Proposed changes**: *A generating station may supply power from alternate source in case of (i) USD in terms of clause (1) of Regulation 47 of these regulations or **(ii) forced outage / planned outage/ partial outage of unit(s)** or (iii) a generating station other than REGS replacing its scheduled generation by power supplied from REGS/**GDAM in all types of Contracts i.e. Long Term/Medium Term/Short term with prior intimation to beneficiaries** irrespective of whether such identified sources are located within or outside the premises of the generating station or at a different location.* **Rationale**: It has been observed that generating stations are allowed to procure power from alternate sources when the plant is under forced outage to meet their energy supply obligations. It may also be appreciated by the Hon'ble Commission that other than the Forced Outage, there are incidences of Planned Outages on account of Annual Overhauling (~45 days), low fuel stock etc as well during which the generating station is not able to fulfil their obligation to beneficiaries. Such outages severally impact availability of the plant especially in case of Section 63 PPAs wherein 85% availability is to be maintained on Monthly/Annual basis else damages at the rate of 25% of quoted fixed cost are levied on generators. Moreover, Sec-63 PPAs for Medium term power supply already allows supply from alternate power in case of Scheduled/Unscheduled maintenance. It is requested to align IEGC in line with the Model Sec-63 PPAs and allow supply from alternate sources during planned outages as well. The model Medium Term PPA is reproduced below for reference: **Quote** 10.3 Substitute Supply In the event the **Availability of the Power Station is reduced on account of scheduled maintenance, unscheduled maintenance, delay in commercial operation, shortage of Fuel or Force Majeure, the Supplier may, supply electricity from any alternative source**, and such supply shall, for payment of Fixed Charge and Variable Charge, be deemed to be supply under and in accordance with the provisions of this Agreement. Provided further that such supply of electricity from any alternative source shall be limited to 180(one eighty) days at a time and 365(three hundred and sixty five) days for the entire Contract Period.For the avoidance of doubt, the Parties agree that in the event the Utility rejects any supply of electricity offered hereunder from an alternative source, the Supplier shall be deemed to be in compliance with this Agreement for the purpose of determination of Availability and payment of Fixed Charge….. **Unquote**

		• Allowing the generators to procure power from alternate sources (including power exchanges- DAM, G-DAM, TAM, G-TAM & RTM) during Planned Outage will help in bridging Demand Supply gap as the beneficiaries won't have to purchase expensive power from other sources. Moreover, through proper planning and timely arrangement of alternate source, the generators will also be able to meet their supply obligations and thus be entitled to recover their fixed costs and further minimise the levy of any penalty etc as per PPAs. • Also, it has been observed that most of the tender documents that are released through DEEP Portal, has a specific clause wherein it is mentioned that buyer's consent is required before procuring alternate power. It is requested that in case such alternate power is being supplied through alternate sources, there should be no requirement to seek Buyer's consent. A prior intimation can be given to them if considered feasible by the Hon'ble Commission.
7	Clause 48 (3) (a) of IEGC, 2023- Methodology for scheduling power from REGS Additional Comment	**Existing Clause:** *The methodology for scheduling of power from alternate sources covered under sub - clause (iii) of clause (1) of this regulation, shall be as per the following steps:* *(a)* ***The generating station shall enter into contract with REGS for supply of power from alternate sources****.* **Proposed Clause**: *The generating station shall enter into contract with REGS for supply of power from* ***any alternate sources including GDAM. Further, appropriate mechanism to be put into place for smooth execution of such transactions.*** *Also, like Real Time Market for Conventional Energy, Green RTM Segment is also need of the hour and Hon'ble Commission is requested to issue the necessary directions to Power Exchanges for implementation of Real Time basis on Green Energy* **Rationale**: • The underlying objective of Regulation 48 is to facilitate replacement of thermal generation with renewable sources while maximizing gains to beneficiaries and consumers. Restricting procurement only through bilateral contracts with REGS may limit available options and reduce competitive price discovery. • Allowing procurement through GDAM would enable generators to access the most economical source available at a given time, thereby increasing the probability of achieving a larger net gain for sharing with beneficiaries. • Further, in case the thermal power is being replaced with Green power, then it has been observed that there is frequent revision in availability due to solar dependency. Hence, it is proposed to introduce G-RTM market that would facilitate buying of any curtailed quantum from open market in real time in case of any curtailment. This would

		also ensure effective utilisation of precious renewable energy where sellers are able to sell any surplus available with them on real-time basis. • Further, generators face lot of operational issues while executing such transactions. Most frequent of them being that respective RLDCs punch the contracted quantum after deducting ISTS losses and then generators have to constantly follow-up with exchanges, traders and RLDCs to resolve the issues. It is suggested that clear cut guideline as well as the automation process should be put in place for successful execution of such transactions with minimum human intervention and there is an urgent need of REMC scheduling software integration with WBES interface being maintained by RLDCs in a definite timeframe.

Annexure-1

WBES Revision No. 94 (11:33 hrs.), our total Scheduled Generation (SG) was as per the available schedule i.e. 308.72 MW.



Net Schedule

Download CSV | Download Excel

Region: WRLDC | Date: 30-10-2026 | Flow Area Wise: No OR Yes | Revision: 94 | Utility: JHABUA_IPP

Unit: Select Units | Show Data

Published Time: 2026-10-30 11:33:00

Time Block	Time Desc	ISGS	URS	OA_GNA	OA_TGNA	OA_PX	OA_REMC	AS	SCED	SCUC	Total
52	12:45-13:00	0.00	0.00	-255.00	-78.72	0.00	25.00	0.00	0.00	0.00	-308.72
53	13:00-13:15	0.00	0.00	-255.00	-78.72	0.00	25.00	0.00	0.00	0.00	-308.72
54	13:15-13:30	0.00	0.00	-255.00	-78.72	0.00	25.00	0.00	0.00	0.00	-308.72

Annexure-1

Beneficiary has revised its schedule for 13:00–13:30 hrs delivery ,the revised SG was reflected only at 11:48 hrs. under WBES Revision No. 95, as follows:

Net Schedule

Download CSV | Download Excel

Region: WRLDC | Date: 30-10-2026 | Flow Area Wise: No OR Yes | Revision: 95 | Utility: JHABUA_IPP

Unit: Select Units | Show Data

Published Time: 2026-10-30 11:48:00

Time Block	Time Desc	ISGS	URS	OA_GNA	OA_TGNA	OA_PX	OA_REMC	AS	SCED	SCUC	Total
52	12:45-13:00	0.00	0.00	-255.00	-78.72	0.00	25.00	0.00	0.00	0.00	-308.72
53	13:00-13:15	0.00	0.00	-335.00	-78.72	0.00	25.00	0.00	0.00	0.00	-388.72
54	13:15-13:30	0.00	0.00	-419.55	-78.72	0.00	25.00	0.00	0.00	0.00	-473.27

At the same time, Bid was placed in RTM Market for 50 MW for delivery in 13:00 to 13:15 block. So the total schedule in Block No. 53 is 438.72 MW

SO, in trading window of 5 Minute , the final schedule in Block No 53 is 438.72 MW and 2 minutes will be insufficient to revise/withdraw the RTM Bid. Because of that ramp-up of 130 MW is required from Block No. 52 to 53 which is not feasible.