MP POWER MANAGEMENT COMPANY LIMITED
C.I.N.: U40109MP2006SGC018637 (MP GOVT. UNDERTAKING)
Regd. Office : Shakti Bhawan, Rampur, Jabalpur (M.P.)-482008
Tel.: 0761-2661111, 2660500, Fax : 0761-2661696, Website: www.mppmcl.com E-mail : md@mppmcl.com

No. CGM (Regulatory)/ 478 Jabalpur, Dated: 21.10.26

To,

The Secretary,
Central Electricity Regulatory Commission,
6th, 7th & 8th Floors, Tower B, World Trade Centre,
Nauroji Nagar,
New Delhi- 110029.

Sub: Regarding comments on Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026.

Ref:- Public Notice No. L-1/265/2022/CERC Dated: 21.09.2026.

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With reference to above, MP Power Management Company Limited (MPPMCL) has made its comments/ suggestions/ objections, which are enclosed herewith for kind consideration of Hon'ble Commission.

Encl: As above

General Manager (Regulatory)
MPPMCL, Jabalpur.

General Manager (Regulatory)
M.P.Power Management Co. Ltd. JBP.

Chief General Manager (Regulatory), MPPMCL, Block No.11, Shakti Bhawan, Rampur, Jabalpur (MP) 482008.
Tel. 0761-2702402, 0761-2667511, email:akhilesh.agrawal@mppmcl.com

6. Response and reserves — Regulation 30	Inclusion of ESS/PSP, revised reserve methodologies, quarter-ahead assessment and bulk-consumer obligations.	Storage contribution should reflect available MW, MWh and duration. Bulk-consumer obligations should not be counted again against DISCOM obligations.
7. Congestion charge — New Regulation 30A	Applicability, notices, rates, weekly accounts, payment and disbursement.	Charges should be based on an auditable assessment of adverse contribution. Blanket charging of every deviation in a simultaneously congested wheeling region should be replaced by a multi-corridor attribution methodology. Publish ATC/TTC, rates and block-wise calculations; provide timely alerts and correction procedures; prevent duplicate recovery and inappropriate liability for operator-directed actions.
8. Scheduling and defaults — Regulation 45	Revision of high-inflow periods, peak/off-peak DC safeguard, access restrictions and State free-hydro-power sales.	Revision should be evidence-based, prospective revision of high-inflow periods and prevention of strategic peak-hour under-declaration. Access restrictions should follow notice, reconciliation and proportionate escalation, with clear entity-wise liability.
9. USD/SCUC — Regulation 46	Revised shutdown timelines, binding requisitions and SCUC at any time.	Replace the uniform 50% MCR criterion with applicable certified minimum turndown level (MTL).
10. Shutdown and revival — Regulation 47	On-bar unit planning, revised schedules, off-bar DC charges and revival obligations.	Optimise the number of running units on least-cost secure-operation principles. Off-bar capacity charges should remain subject to applicable tariff/PPA provisions, verified availability and timely revival. Define restart timelines and remove DC credit when the required revival fails.
11. New Annexures 8 and 9	State free-hydro-power transactions and scheduling of decommitted units.	The procedures should preserve existing DISCOM entitlements and contractual rights, provide for beneficiary participation/consultation, and specify transparent scheduling, accounting and replacement-energy settlement before financial implementation.

General Manager (Regulatory)
M.P.Power Management Co. Ltd. JBP.

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

Clause-wise comments and suggestions

S. No. / Draft amendment	Proposed amendment	Comments / suggestions of MPPMCL
1. Interchange before COD — Regulation 19	Extension of interchange permission for REGS/ESS, aggregating to three months, with reporting requirements.	Supported, subject to the generating entity disclosing the reasons for delay and the revised commissioning schedule to contracted buyers at the same time as the request to RLDC. RLDC approval should not, by itself, extend contractual SCOD, waive delay damages or create entitlement to additional charges; those matters should remain governed by the applicable PPA and law.
2. Trial-run notice — Regulation 21	Notice reduced from seven days to three days.	Generating entity shall serve complete test information to buyer before start of trial run period who inter turn may witness remotely. Where physical witnessing is contractually required, sufficient notice should be retained unless otherwise agreed. Non-attendance should not constitute waiver of contractual rights.
3. Trial runs — Regulation 22	Phased trial runs for solar/ESS; revised PSP testing; additional capacity-demonstration period for transmission constraints.	Phased commissioning may be permitted without altering contractual commissioning deadlines. ESS tests should establish MW, usable MWh, duration and efficiency. Conditional PSP COD should not create payment entitlement for undemonstrated capability. Any derating should entail consequential payment reconciliation.
4. Infirm power — New Regulation 25A	Scheduling after successful trial-run certification; contractual treatment or first offer to buyers with seven-day notice.	Offers should specify quantum, profile, tariff, delivery point and settlement responsibility, and be sent simultaneously to intermediaries and authorised ultimate procurers. Procurement should require express acceptance. Third-party sale should not prejudice contracted supply, SCOD or applicable contractual revenue adjustments.
5. Commercial operation — Regulation 27	Separate PSP COD provisions; regulatory COD distinguished from contractual conditions.	Regulatory COD should not automatically constitute contractual COD, trigger contractual payments or waive performance obligations. Unit-wise PSP COD should not establish full plant-level storage capability or entitlement to full contracted charges.

General Manager (Regulatory)
M.P.Power Management Co. Ltd. JBP.