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(A Govt. of Maharashtra Undertaking)
CIN: U40109MH2005SGC153645

Ref. No: CE/PM&T/CERC/ No 37240 **Date:** 02 NOV 2026

To,
The Secretary,
Central Electricity Regulatory Commission,
World Trade Centre,
6th, 7th and 8th Floor, Tower-B,
Nauroji Nagar, New Delhi – 110029.

Email: secy@cercind.gov.in; shilpa@cercind.gov.in

Subject: **Submission of Additional Comments on Draft CERC (IEGC) (Second Amendment) Regulations.**

Reference: **1.** Public Notice No. L-1/265/2022/CERC dated 21.09.2026.
2. MSEDCL Ltr. No. : CE/PM&T/IEGC/35809 dated 21.10.2026.
2. Public Notice No L-1/265/2022/CERC dated: 22.10.2026

Respected Sir,

With reference to the above subject, MSEDCL had already submitted its comments on the Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations vide Reference No. 2.

Subsequently, the Hon'ble Commission has extended the deadline for submission of comments vide the Public Notice referred to above.

In view of the extended timeline, please find attached herewith the additional comments of MSEDCL for your kind consideration.

Thanking you.

Yours faithfully,

Chief Engineer
(Power Management &Trading)
MSEDCL

Copy s.w.rs. to :
1. Director (Commercial), Prakashgad, MSEDCL
2. Executive Director, (Commercial)
3. Executive Director, (Power Purchase)

AIDA Comments on Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026.

Sr. No.	Clause Reference	Clause	MSEDCL Comments / Suggestions	Rationale
1	**Regulation 22 – Demonstration of rated capacity where transmission constraints exist**	**5. Amendment to Regulation 22 of the Principal Regulations:** (9) A new sub-clause (j) shall be added after sub-clause (i) of Clause (3) of Regulation 22 of the Principal Regulations as under: "(j) it is not possible to demonstrate the rated capacity of the plant within one year from the date of COD due to transmission constraints, such plant may demonstrate the rated capacity of the plant within one year from the date of effectiveness of the GNA or one year from the date of COD, whichever is later."	MSEDCL suggests that where a generating station is unable to demonstrate its rated capacity solely due to transmission constraints, the proposed provision may allow demonstration within the prescribed extended period. However, such extension and any consequential declaration of Commercial Operation Date (COD) should be subject to appropriate safeguards. The extension should not dilute the generator's contractual obligations under the PPA, nor should any additional cost, liability or financial implication arising from the delay be passed on to the procuring DISCOM.	A transmission constraint may prevent demonstration of capacity despite the readiness of the generating station. However, the resulting costs and commercial consequences should not automatically be borne by the DISCOM. The regulatory provision should clearly distinguish between grid-operational requirements and contractual obligations under the PPA.
2	**Regulation 27 – COD of hybrid generating stations**	**9. Amendment to Regulation 27 the Principal Regulations:**	MSEDCL suggests that the provisions relating to COD of hybrid projects should clearly distinguish between the	In hybrid projects involving different generation technologies, the delayed readiness of one

		(5) The words "and subject to fulfilment of other conditions, if any, as per PPA." in sub clause (e)(i) of Clause (1) of Regulation 27 of the Principal Regulations, shall be substituted with a Proviso as under: "Provided that in case the contract entered into by such generating station or ESS provides conditions other than provided for in these regulations , as prerequisite for achieving commercial operation of such generating station or ESS , the entity shall meet those conditions in terms of the contract prior to power supply under such contract, however such generating station or ESS shall declare commercial operation for the purpose of these regulations after successful trial run in terms of these Regulations."	requirements for grid operation and the conditions governing commencement of contracted power supply under the PPA. Where one component of a hybrid project is ready while the other component is delayed, injection of power from the available component should not automatically create a procurement or payment obligation on the DISCOM contrary to the PPA. Any interim supply of infirm power should be governed by the buyer's consent and the applicable contractual provisions.	component may affect the availability and time profile of the contracted power. The Grid Code should not override the agreed commercial terms or compel a DISCOM to procure power in a manner inconsistent with its PPA.