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From: PM&C COMMERCIAL <nhdc.commercial@gmail.com>
To: <secy@cercind.gov.in>, <shilpa@cercind.gov.in>
Date: Wed, 21 Oct 2026 17:45:34 +0530
Subject: NHDC - Comments of NHDC on Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026
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Sir,
Please find attached herewith comments of NHDC in the subject draft regulations for kind consideration of Hon'ble Commission.
Thanks & Regards

General Manager (Comml.),
NHDC Ltd., Bhopal

Comments of NHDC on Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026

Hon'ble Commission has issued draft amendment in Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026 vide public notice dated 21.09.2026 and invited comments/suggestions/objections from the stakeholders by 21.10.2026. Accordingly, comments/suggestions/objections of NHDC on the relevant regulations are as under:

12. Amendment of Regulation 45 the Principal Regulation:

Ref. Clause No. of existing Regulation	Existing Provision	Proposed Amendment	Comments of NHDC
Clause 8(a) of Regulation 45	"…… *Provided further that the hydro generating stations may declare ex-bus Declared Capacity more than 100% MCR less auxiliary power consumption limited to overload capability in terms of sub-clause (a) of clause (10) of this Regulation during high inflow periods:* *Provided further that a high inflow period for this purpose shall be notified by the respective RPC".*	Hon'ble Commission in the instant draft amendment has proposed to include the following in the above existing provision: "including revision of the already declared high inflow period, as required."	It is submitted that methodology for calculation of high inflow period as adopted by the RPC may also be made applicable to all SLDC's so that they can also declare high inflow period well in advance before start of monsoon period, and all hydro generator can issue Declared Capacity more than 100% MCR less auxiliary power consumption limited to overload capability, for maximum utilization of water in power generation so as to avoid spillage of water from Dam.

			NHDC being CPSU, its tariff is determined by the Hon'ble CERC, however MPPMCL (GoMP) being 100% beneficiary, its scheduling & accounting is being done by MPSLDC. Further, MPSLDC issue notification of high inflow period in the state when reservoirs are almost full/spillage condition arises. **Therefore, Hon'ble CERC is requested to add following wordings in the clause :** **"....including revision of already declared high inflow period well in advance before start of monsoon period, as required, alongwith methodology for adoption by RPC/States".**