Ref no: NSEFI/CERC/2026-27/0112
Date: 21.10.2026

To,

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

Subject: **Submission of comments on Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026**

Respected Sir,

Greetings from **NSEFI Sustainable Energy Federation of Industry**!

NSEFI Sustainable Energy Federation of Industry is a not-for-profit industry platform established under the aegis of the National Solar Energy Federation of India (NSEFI) to advance India's transition towards a sustainable, low-carbon, and net-zero economy. Building upon NSEFI's legacy since 2013, the Federation serves as an umbrella organization representing stakeholders across the clean energy value chain, including RE Independent Power Producers (RE IPPs), Solar, Wind and Energy Storage Manufacturers, Green Hydrogen IPPs, Manufacturers & Technology providers and other allied stakeholders. Through policy advocacy, industry collaboration, capacity building, and knowledge dissemination, the Federation works across the pillars of electricity, agriculture, industry, and mobility to accelerate investment, innovation, and sustainable growth in support of India's vision of *Viksit Bharat 2047* and its *Net Zero 2070* commitments.

This is with reference to the **Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026**, issued by the Hon'ble Commission for stakeholder comments.

In this regard, NSEFI is pleased to submit the consolidated comments received from our member developers for the kind consideration of the Hon'ble Commission. The consolidated comments are enclosed as an **Annexure** for ease of reference.

We would also like to submit that several of our member developers have been unable to share their comments on the draft regulations within the present timeline due to the ongoing festive season. In view of the same, NSEFI would like to inform the Hon'ble Commission that any additional comments received from our members will be compiled and submitted as an addendum to this letter.

We respectfully request the Hon'ble Commission to kindly take such additional comments into consideration, along with the comments submitted herein, while finalising the draft Regulations.

With Best Regards,



Subrahmanyam Pulipaka
Chief Executive Officer
NSEFI Sustainable Energy Federation of Industry

Copy To:

1. **Shilpa Agarwal, Joint Chief, Central Electricity Regulatory Commission,** 6th, 7th & 8th Floors, Tower B, World Trade Centre, Nauroji Nagar, New Delhi- 110029

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

S.no	Clause	Comments/Suggestions	Rational
1	**Regulation 19(3), first proviso (a)(ii) and (iii)** "(ii) The request seeking extension of the period for inter-change of power shall be made at least 10 days prior to the requested start date of interchange of power." "(iii) RLDC may allow multiple extensions with a cumulative time extension for three months, after carefully examining the reasons for such extension."	**Add the following provisos:** "Provided that RLDC may accept a shorter notice where the need for extension arises from an unforeseen event beyond the control of the REGS or ESS, for reasons recorded in writing. Provided further that periods during which interchange is prevented solely by non-availability of the transmission system, as certified by RLDC in consultation with CTU or the concerned transmission licensee, shall be excluded when computing the cumulative three-month extension. Monthly progress reporting shall continue during such periods."	An unforeseen grid outage may make ten days' notice impracticable. Counting periods when the grid cannot permit interchange exhausts the testing window without providing a testing opportunity. The proposed exclusion is limited to certified transmission non-availability; it does not excuse developer delay or permit interchange without RLDC approval.
2	New sub-clause (j) added after sub-clause (i) of Clause (3) of Regulation 22 of the Principal Regulations "(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."	In addition to the given clause the following should also be considered. Increase the period available for demonstration of rated capacity, presently permitted within one year from the date of effectiveness of GNA or one year from the date of COD, whichever is later, by empowering the Grid Operator to grant an extension of up to six months on a case-by-case basis in the event of force majeure or other circumstances beyond the control of the generator.	

3	**Flexibility in phased trial runs** ***Regulations 22(3)(a) and 22(3)(e)*** For solar projects of 250 MW or more: "Provided also that in the case of a project having a capacity of 250 MW or more, the trial run may be performed in instalments, with a minimum capacity of 50 MW without any limit on the number of instalments." The same proviso is proposed for standalone ESS. For standalone ESS above 50 MW and below 250 MW, the balance is restricted to "a maximum of three instalments with a minimum capacity of 5 MW". The corresponding solar limit of four balance instalments is retained below 250 MW.	**Replace the balance-instalment restrictions for solar projects and standalone ESS with:** "After the first trial run of at least 50 MW, the balance capacity may undergo trial run in instalments of at least 5 MW, without a limit on the number of instalments, irrespective of whether the total project capacity is below or above 250 MW. Provided that the final residual capacity below 5 MW may be tested as one instalment corresponding to the installed inverter or PCS configuration. Each instalment shall independently meet the applicable trial-run requirements." Retain the existing exceptions for entities whose eligible connectivity capacity is below 50 MW.	Inverter and PCS blocks, feeder readiness and equipment deliveries may not align with 50 MW increments. A fixed number of instalments can hold back otherwise ready capacity. Smaller subsequent blocks allow progressive commissioning without relaxing metering, protection, telemetry or performance tests. This also follows the principle of smaller subsequent batches already available to wind projects.
4	Clause (3) of Regulation 22 of the Principal Regulations	De-rating provision should not be applicable in case the project is unable to demonstrate active power injection (equivalent to installed capacity) solely due to transmission line losses. The project should be permitted to declare COD for the sum of installed rated capacity of generating equipment.	
5	Regulation 24(2): All thermal generating stations having a capacity of more than 200 MW and hydro generating stations having a capacity of more than 25	All thermal generating stations having a capacity of more than 200 MW and hydro generating stations having a capacity of more than 25 MW, **pumped storage plants**	• ESS should not be directly controlled by RLDC bypassing the RE Plant. RLDC should provide the desired operation command

	MW, **pumped storage plants having a capacity of more than 25 MW and ESS (excluding Pumped Storage Plant) having a capacity of 25 MW and above**, shall submit documents confirming the enablement of automatic operation of the plant from the appropriate load despatch centre by integrating the controls and tele-metering features of their system into the automatic generation control in accordance with the CEA Technical Standards for Construction and the CEA Technical Standards for Connectivity.	**having a capacity of more than 25 MW ~~and ESS (excluding Pumped Storage Plant) having a capacity of 25 MW and above~~**, shall submit documents confirming the enablement of automatic operation of the plant from the appropriate load despatch centre by integrating the controls and tele-metering features of their system into the automatic generation control in accordance with the CEA Technical Standards for Construction and the CEA Technical Standards for Connectivity.	to IPP for execution and same will be executed by IPP through PPC. This provision for RLDC instructing for desired operations would also be applicable for ESS which are co-located with a RE Plant. • The provision should explicitly exclude ESS which are already contracted under RE with storage / RTC/FDRE projects.
6	Regulation 27 (5): The words "and subject to fulfilment of other conditions, if any, as per PPA." in subclause (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."	Please clarify weather "power supply under such contract" in the Reg 27 proviso does not restrict sale of power before COD where the contract itself provides for it, for example part-commissioning or early commissioning, and that such power is scheduled under Reg 25A(2).	

7	Regulation 30A.: CONGESTION CHARGE (1) Applicability of Congestion Charge.	In its Order dated 13.03.2026 in Petition No. 1/SM/2026 (para 12(b)), the Commission proposed that no congestion charge be levied where congestion arises from a forced line outage occurring after schedules are fixed. Draft Regulation 30A does not include this exemption. It is requested that the following proviso be added to Regulation 30A(1): "Provided that no congestion charge shall be levied for congestion in a transmission corridor if the power flow on the corridor is as per the schedule, but the congestion has been caused by forced outage of a line in the corridor occurring after the schedule has been fixed."	