एनटीपीसी विद्युत व्यापार निगम लिमिटेड
(एनटीपीसी लिमिटेड की पूर्ण स्वामित्व वाली सहायक कम्पनी)
NTPC Vidyut Vyapar Nigam Limited
(A Wholly Owned Subsidiary of NTPC Limited)

केन्द्रीय कार्यालय/Corporate Centre

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

Date: 2nd Nov 2026

Subject: NVVN's comment/submission on Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026

Sir

Hon'ble Commission has published Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations 2026 on 21.09.2026 and has invited comments from the stakeholders on the Draft Regulations.
In this regard, please find enclosed submissions of NVVN on the Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations 2026.

Thanking you,

With kind regards,

P. B. Venkatesh

P.B. Venkatesh

Chief General Manager
Mob:9650990226

पी. बी. वेंकटेश/P. B. VENKATESH
मुख्य महाप्रबन्धक (एन वी वी एन)
Chief General Manager (NVVN)
एन टी पी सी विद्युत व्यापार निगम लिमिटेड
NTPC Vidyut Vyapar Nigam Limited
EOC, A-8A, Sector-24, Noida (UP)

Comments/Suggestions on Regulation 48 – Scheduling from Alternate Source of Power

1. Recognition of Trading Licensees

It is submitted that Regulation 48 may be suitably amended to explicitly recognise Trading Licensees as distinct entity as per Electricity Act 2003 for arranging and scheduling power from alternate sources to fulfil their contractual obligations towards buyers/beneficiaries with whom they have contract.

At present, the provisions primarily envisage a generating station arranging alternate power in specified circumstances. However, Trading Licensees also enter into long-term, medium-term and short-term power supply arrangements with distribution licensees and other buyers/consumers, and may be required to arrange alternate power to ensure continuity of supply and fulfilment of their contractual commitments.

2. Proposed insertion of an independent sub-regulation

It is proposed that a separate sub-regulation may be inserted after Regulation 48(3), as follows:

"(4) Scheduling of Power from Alternate Sources by Trading Licensees

(a) A Trading Licensee may arrange and supply power from an alternate source to fulfil its contractual obligations under an existing power supply agreement with a buyer discom/consumer, subject to the terms and conditions of the contract between the Trading Licensee and the buyer.

(b) For the purpose of such alternate supply, the Trading Licensee shall be permitted to enter into bilateral or collective transactions with alternate generators, sellers or other eligible entities and may apply for and seek allocation of the required Open Access corridor/transmission access in its capacity as an applicant, in accordance with the applicable Connectivity and General Network Access Regulations and IEGC-2023 and subsequent amendments.

(c) The prior consent of the buyer/Distribution Licensee shall not be required for arranging and scheduling alternate power to buyer(s), provided that such substitution is within the scope of the original contractual arrangement and does not result in any inconsistency with the agreed contractual terms and conditions.

3. Rationale and expected benefits



The proposed amendment would:

i. **Enable contractual fulfilment:** Allow Trading Licensees to meet their contractual supply commitments through alternate sources without being constrained by the availability of the originally identified source.
ii. **Improve supply flexibility:** Facilitate substitution of power during generation outages, fuel constraints, source unavailability etc.
iii. **Avoid unnecessary consent requirements:** Prevent delays in arranging alternate supply where the substitution is already permissible under the original contract and does not alter the buyer's contractual rights or obligations.
iv. **Improve market efficiency:** Promote efficient utilisation of available generation and transmission capacity while strengthening the role of Trading Licensees in power portfolio management.

Submission: In view of the above, Hon'ble CERC is requested to consider insertion of a separate provision under Regulation 48 to expressly enable Trading Licensees to arrange, seek transmission access for, and schedule power from alternate sources for fulfilment of their existing contractual obligations.

