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Date: 2 November 2026

To
The Secretary
Central Electricity Regulatory Commission
World Trade Centre, Tower B
Nauroji Nagar, New Delhi - 110029

Subject: Comments and suggestions on Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026

Reference: Notice No. L-1/265/2022/CERC dated 21 September 2026, read with the extension notice dated 22 October 2026.

Respected Sir/Madam,

Norexis Technologies Private Limited is an Indian energy technology company developing digital tools for consumer energy data, distributed energy resource visibility and demand-side participation.

We welcome the Commission's proposals to bring scheduling closer to real time and strengthen grid reliability. We respectfully submit the following four suggestions from an energy technology and demand-side participation perspective.

1 Readiness and standard interfaces for shorter scheduling timelines

Regulations 48 and 49; draft paragraph 16

We support the phased shortening of scheduling timelines. Ahead of Phase 2 commencing on 1 April 2027, with its five-minute bidding window, we request publication of standardised API specifications, a test environment and mock sessions for market participants. The implementation arrangements should cover timestamped schedule revisions, submission acknowledgements, communication failures and fallback procedures.

Building on the standardised API integration envisaged in paragraph 20.11 of the Explanatory Memorandum, we suggest that NLDC report demonstrated end-to-end readiness to the Commission before Phase 2 commences.

2 Clear and proportionate reserve obligations for bulk consumers

Regulation 30(11) and Annexure-3; draft paragraphs 10 and 18

The revised reserve procedure, when issued for stakeholder consultation, should explain how obligations are apportioned to regional entity bulk consumers, including consideration of their contribution to area control error or deviations. It should specify advance notification of the assessed quantum, compliance verification and the treatment and pricing of shortfalls.

The procedure should also clarify how eligible contracted storage and verifiable demand response may contribute towards these obligations, subject to technical qualification, appropriate measurement and verification standards, and safeguards against double counting.

3 Transparent congestion notices and charge calculation

Proposed Regulation 30A and Regulation 59; draft paragraphs 11 and 17

In addition to the notification channels specified in Regulation 30A(3) and (4), we request standard machine-readable notices for application and withdrawal of congestion charges. Each notice should identify the affected corridors, applicable entities and effective time blocks, with the withdrawal time stated in the withdrawal notice.

The detailed procedure under Regulation 30A(8) should include worked examples for simultaneous congestion on importing and exporting corridors, explaining charge calculation, overlapping events and safeguards against duplicate recovery. We also request the Commission to state the rationale for charging all deviations in a wheeling region under Regulation 30A(1)(b), in addition to deviation charges under Regulation 30A(1)(c), and to consider specifying a minimum deviation threshold. Any recognition of deviations that relieve congestion should account for their effect on all simultaneously congested corridors. This would help participants respond in support of grid security.

We further note that proposed Regulation 59(5) refers to the "Second Amendment, Regulations, 2025", which appears to be intended as 2026.

4 Coordinated development of aggregated distributed flexibility

Related area for future regulatory development

As a related area for future development, we request consideration of a coordinated consultation involving CEA, Grid-India, the Forum of Regulators, State Electricity Regulatory Commissions, distribution licensees and other relevant stakeholders on the treatment of aggregated distributed flexibility.

Such consultation could address dependable portfolio capacity, proportionate telemetry and interoperability, measurement and verification, dispatch accountability, consumer consent, cybersecurity and settlement. It should distinguish distribution-level services from inter-state market participation and clarify the respective responsibilities of aggregators, DISCOMs and load despatch centres.

We request the Commission to consider these suggestions in the final regulations and associated procedures, and to identify aggregated distributed flexibility as an area for further coordinated examination.

Yours faithfully,
For Norexis Technologies Private Limited



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