पावर ग्रिड कॉर्पोरेशन ऑफ इंडिया लिमिटेड
(भारत सरकार का उद्यम)
POWER GRID CORPORATION OF INDIA LIMITED
(A Government of India Enterprise)

सदंर्भ: CC/RC/ Grid Code 2nd amendment

दिनांक: 21/10/2026

To,

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

विषय - "Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026"

- Submission of comments/suggestions thereof.

महोदय,

This has reference to public notice no. L-1/265/2022/CERC dated 21st September, 2026 vide which comments were sought on the subject draft amendment.

In this regard, please find enclosed POWERGRID's comments/suggestions on the proposed "Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026" for consideration of Hon'ble Commission.

Thanking you,

Yours faithfully

21/10/26

(A Jagannath Rao)
Chief General Manager (Regulatory Cell)

Encl:

POWERGRID's comment on subject amendment

POWERGRID Comments on draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026

lS	Clause as proposed in draft 2nd amendment	POWERGRID Comments
1.	***21. NOTICE OF TRIAL RUN*** *(1) The generating company proposing its generating station or a unit thereof for trial run or repeat of trial run shall give a notice of not less than ~~seven (7)~~ three (3) days to the concerned RLDC, and the beneficiaries of the generating stations, including intermediary procurers, wherever identified:* *Provided that in case the repeat trial run is to take place within forty eight (48) hours of the failed trial run, fresh notice shall not be required.* *(2) The transmission licensee proposing its transmission system or an element thereof for trial run shall give a notice of not less than seven days to the concerned RLDC, CTU, distribution licensees of the region and the owner of the inter-connecting system.*	***21. NOTICE OF TRIAL RUN*** *(1) The generating company proposing its generating station or a unit thereof for trial run or repeat of trial run shall give a notice of not less than ~~seven (7)~~ three (3) days to the concerned RLDC, and the beneficiaries of the generating stations, including intermediary procurers, wherever identified:* *Provided that in case the repeat trial run is to take place within forty eight (48) hours of the failed trial run, fresh notice shall not be required.* *(2) The transmission licensee proposing its transmission system or an element thereof for trial run shall give a notice of not less than ~~seven (7)~~ three (3) days to the concerned RLDC, CTU, distribution licensees of the region and the owner of the inter-connecting system.* *Provided that in case the repeat trial run is to take place within forty eight (48) hours of the failed trial run or non-commencement of trial run on the date proposed under above notice, as the case may be, fresh notice shall not be required.*
	Rationale: **A. <u>3 days notice period for transmission licensee</u>** **1. Consistency with the Hon'ble Commission's rationale for generating stations**	

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	• In the Explanatory Memorandum, the Commission has observed that there is no reason to wait for seven days once a generating unit is ready for trial operation and has accordingly proposed a three-day notice period. • The same reasoning applies, with equal force, to transmission systems. Trial run of a transmission element is preceded by continuous coordination concerning energization, protection-system readiness, telemetry, communication, metering, interconnection availability and system configuration. Consequently, the RLDC, CTU and connected entities are already aware of the readiness and progressive commissioning status of the transmission element. Trial operation is generally not an isolated or unforeseen event requiring a mandatory seven-day lead time. • The formal notice under Regulation 21(2) is, therefore, primarily required for finalizing the date and time of the trial run and enabling the concerned entities to make arrangements for facilitating or witnessing it. A period of **three days is sufficient for this purpose** and once a transmission element has completed the prescribed commissioning tests and is ready for trial operation, continuation of a seven-day notice period does not provide any additional operational or regulatory benefit. • The trial operation of generation and transmission assets forms part of the same integrated commissioning framework under the IEGC. Retaining a seven-day notice period for transmission while reducing it to three days for generation may create an unintended regulatory asymmetry. A shorter notice period would provide operational flexibility to align trial operation with actual site readiness and outage availability. • Uniform treatment would provide greater certainty to generators, transmission licensees, CTU, RLDCs and beneficiaries. **2. Adequate safeguards remain available with RLDC** • Reduction of the notice period would not compromise grid security. Regulation 21(3) empowers the concerned RLDC to determine the actual date and time of commencement of the trial run, considering system constraints. The trial run would continue to be undertaken only as per RLDC's permission and operational instructions.	

POWERGRID Comments on draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026

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	• Accordingly, the proposed reduction would facilitate faster commissioning while preserving the RLDC's authority to defer or regulate trial operation wherever required for secure grid operation. B. **<u>Allowing Transmission Licensees a period of 48 hours in the event of failure of the initial trial run similar to generators:</u>** It is further submitted that the provision permitting a generating station to repeat the trial run after a period of **48 hours in the event of failure of the initial trial run** may also be extended to a transmission system or element thereof. Transmission element's trial runs may occasionally remain unsuccessful due to temporary or rectifiable issues relating to protection, telemetry, communication, metering, interconnecting-system availability or prevailing grid conditions. Once such issues are rectified, requiring the transmission licensee to serve a fresh notice of three days would unnecessarily delay commissioning and result in avoidable idling of the completed asset even though the concerned RLDC, CTUIL and the owner of the interconnecting system would already be aware of and associated with the initial trial run. Accordingly, a suitable provision may be incorporated under Regulation 21 to permit a transmission licensee, upon failure of the initial trial run, to undertake a repeat trial run within 48 hours.	
2.	**27. DECLARATION OF COMMERCIAL OPERATION (DOCO) AND COMMERCIAL OPERATION DATE (COD)** **…….** **(c) Transmission System** (i) The commercial operation date in the case of an Inter-State Transmission System or an element thereof shall be the date declared by the transmission licensee on which the Transmission System or an element thereof is in regular service at 0000 hours	**27. DECLARATION OF COMMERCIAL OPERATION (DOCO) AND COMMERCIAL OPERATION DATE (COD)** **…….** **(c) Transmission System** (i) The commercial operation date in the case of an Inter-State Transmission System or an element thereof shall be the date declared by the transmission licensee on which the Transmission System or an element thereof is in regular service at 0000 hours

POWERGRID Comments on draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026

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	after successful trial operation for transmitting electricity and communication signals from the sending end to the receiving end as per Regulation 23 and submission of a declaration as per clause (3) of Regulation 26 of these regulations : …… Provided also that in case a transmission system or an element thereof executed under regulated tariff mechanism is prevented from regular service on or after the scheduled COD for reasons not attributable to the transmission licensee or its supplier or its contractors but is on account of the delay in commissioning of the concerned generating station or in commissioning of the upstream or downstream transmission system of other transmission licensee, the transmission licensee shall approach the Commission through an appropriate petition along with a certificate from the CTU to the effect that the transmission system is complete as per the applicable CEA Standards, for approval of the commercial operation date of such transmission system or an element thereof: Provided also that in the case of inter-State Transmission System executed through Tariff Based Competitive Bidding, the transmission licensee may declare deemed COD of the ISTS in accordance with the provisions of the Transmission Service Agreement after obtaining (a)a certificate from the CTU to the effect that the transmission system is complete as per the	after successful trial operation for transmitting electricity and communication signals from the sending end to the receiving end as per Regulation 23 and submission of a declaration as per clause (3) of Regulation 26 of these regulations : …… Provided also that in case a transmission system or an element thereof executed under regulated tariff mechanism is prevented from regular service on or after the scheduled COD for reasons not attributable to the transmission licensee or its supplier or its contractors but is on account of the delay in commissioning of the concerned generating station or in commissioning of the upstream or downstream transmission system of other transmission licensee, the transmission licensee shall ~~approach the Commission through an appropriate petition~~ declare the deemed DOCO in terms of above provisions after obtaining (a)a certificate from the CTU to the effect that the transmission system is complete as per the applicable CEA Standards, only in cases where no load charging is not possible and (b) no load charging certificate from the respective RLDC, where no load charging is possible. ~~along with a certificate from the CTU to the effect that the transmission system is complete as per the applicable CEA Standards, for approval of the commercial operation date of such transmission system or an element thereof:~~

POWERGRID Comments on draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026

<table>
<tr><th>1S</th><th>Clause as proposed in draft 2nd amendment</th><th>POWERGRID Comments</th></tr>
<tr><td></td><td>specifications of the bidding guidelines and applicable CEA Standards and (b) no load charging certificate from the respective RLDC, where no load charging is possible.</td><td>Provided also that in the case of inter-State Transmission System executed through Tariff Based Competitive Bidding, the transmission licensee may declare deemed COD of the ISTS in accordance with the provisions of the Transmission Service Agreement after obtaining (a)a certificate from the CTU to the effect that the transmission system is complete as per the specifications of the bidding guidelines and applicable CEA Standards, only in cases where no load charging is not possible and (b) no load charging certificate from the respective RLDC, where no load charging is possible.</td></tr>
<tr><td></td><td colspan="2">Rationale:
1. Dispensation of CTUIL Completion Certificate in cases where transmission element is charged at rated voltage from one end

• Regulation 27 of the Grid Code Regulations, 2023 requires submission of a completion certificate from CTUIL in cases where a transmission system, though complete, is unable to be put into regular service on account of delay in commissioning of associated upstream/downstream elements.

• The Statement of Reasons issued along with the Grid Code Regulations clarifies that certification by CTUIL has been prescribed to ensure that an element which is not carrying power has nevertheless been completed as per the approved scope of work.

• However, in cases where the transmission element has already been successfully charged at rated voltage from one end and trial operation at no load has been completed, the successful charging itself establishes that the asset has been fully constructed, tested, energised and is technically complete as per the approved scope and applicable standards.</td></tr>
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	• Accordingly, the requirement of obtaining a separate CTUIL completion certificate, in cases where element is charged from one end, does not serve any useful purpose. **It is therefore requested that Regulation 27 may be suitably amended to dispense with the requirement of CTUIL completion certificate where a transmission line/substation element has been successfully charged at rated voltage from one end and has completed the prescribed trial run operation at No-load.** **2. Enabling declaration of deemed COD by transmission licensee for RTM projects in mismatch scenarios at par with TBCB projects** • At present, in respect of Regulated Tariff Mechanism (RTM) projects, where the transmission system is complete but regular service is prevented due to delay in associated generating stations or upstream/downstream transmission systems, the transmission licensee is required to approach the Hon'ble Commission for approval of COD. • This process often results in significant time gaps between physical completion of the asset and approval of COD, leading to deferment of revenue recognition despite the asset being available for service. • In contrast, TBCB transmission licensees are permitted to declare deemed COD in accordance with the provisions of TSA, subject to fulfilment of prescribed conditions. • In view of the above, it is requested that the Grid Code Regulations, 2023 may be suitably amended to permit transmission licensees implementing RTM projects to declare deemed COD in mismatch scenarios. Further, adequate regulatory oversight would continue to remain available with the Hon'ble Commission during tariff proceedings	

POWERGRID Comments on draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026

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	• The above amendment would help ensure equitable treatment across RTM and TBCB projects, eliminate avoidable procedural delays, facilitate timely recognition of revenue of completed transmission assets, and better align commercial operation provisions with actual physical completion and readiness of the transmission system.	

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