========== Forwarded message ==========
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Date: Wed, 21 Oct 2026 18:36:59 +0530
Subject: Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026 - Comments
========== Forwarded message ==========

Dear Sir,

PFA our comments on the draft amendments for kind consideration.

Regrads,

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Purvah comments on the draft CERC Indian Electricity Grid Code Second Amendment Regulations 2026

Purvah Green Power Private Limited

PGPPL submits the following comments for consideration, focusing on renewable generation and energy storage.

Existing clause in draft regulation	Suggested change in draft regulation	Remarks and reasoning
1 Extension of interchange permission ***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 those 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."	The advance intimation and monthly reporting requirements are supported. However, 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 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.

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