RENEWABLE ENERGY SOCIETY OF INDIA (RESI)

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No. RESI/CERC/2026/10 15 Oct 2026

To

**The Secretary,**
Central Electricity Regulatory Commission,
New Delhi

**Subject:** Comments/Suggestions of Renewable Energy Society of India (RESI) on the Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026 issued vide dated 21.09.2026, along with the Explanatory Memorandum.

Sir/Madam,

The Renewable Energy Society of India (RESI) expresses its sincere appreciation to the Hon'ble Commission for initiating the Second Amendment to the Indian Electricity Grid Code, 2023. The proposals reflect a constructive response to stakeholder feedback, Suo-motu Orders, and operational experience, and will support the orderly integration of renewable energy, energy storage systems (ESS), and hybrid projects that are critical for India's 500 GW non-fossil capacity target and the National Green Hydrogen Mission.

RESI welcomes several progressive changes, particularly the reduction of the trial-run notice period, greater flexibility for large-capacity trial runs, alignment of ESS trial-run requirements, delinking of Grid Code COD from PPA conditions, structured treatment of infirm power, and inclusion of ESS/PSP in primary response obligations. These measures will reduce delays, improve bankability, and facilitate faster commercialisation of RE and storage assets.

After careful examination of the Draft Regulations and Explanatory Memorandum, RESI submits the following focused, practical suggestions. The comments are limited to provisions where intervention or clarification will materially improve implementation.

**1. Regulation 19 – Extension of period of interchange of power (REGS and ESS except Hydro PSP ESS)**

| Observation | Suggestion |
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| The structured process (advance intimation of reasons and likely | It may be clarified that the cumulative three-month extension by RLDC is without prejudice to the Commission's power under the main clause to grant further extensions in exceptional cases (e.g., |

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| date, request at least 10 days prior, cumulative RLDC extension of three months, and monthly status updates) is welcome and addresses observed delays. | prolonged transmission constraints beyond the control of the entity).<br>A non-exhaustive illustrative list of valid reasons (transmission system delay, force majeure, system-operator curtailment, extreme weather, or connectivity-related issues) may be provided in the detailed procedure or through a clarifying note, so that RLDC examination remains consistent and timely.<br>Where a timely request is pending, continuation of interchange on the existing terms may be permitted until the RLDC decision, to avoid abrupt stoppage that creates further system imbalance. |

**2. Regulation 22 – Trial-run provisions for solar, wind, ESS and large projects**

| Observation | Suggestion |
|---|---|
| Provisions for NER/Sikkim and BBMB lower capacities, unlimited instalments (minimum 50 MW) for projects ≥250 MW, unit-wise trial for PSP, and the new sub-clause (j) for transmission-constrained demonstration of rated capacity are positive and practical. | For standalone ESS, the 50 MW minimum (with flexibility for <50 MW under relevant GNA clauses and instalments for larger projects) is aligned with solar/wind and is acceptable. It is requested that the same flexibility be expressly extended to co-located or hybrid ESS that is part of a REGS+ESS or green-hydrogen project, so that the ESS component can be trialled independently or in stages once the associated RE capacity is available.<br>Sub-clause (j) may be broadened slightly to cover other uncontrollable factors that prevent demonstration of rated capacity within one year (e.g., sustained system-operator curtailment, ROW issues, or extreme weather), either by allowing an application to the Commission or by treating the later of GNA effectiveness or COD + one year as the outer limit in all such documented cases.<br>A short clarification that hybrid projects may declare trial-run success and COD of individual components (solar/wind/ESS) independently would prevent the delays currently observed when one component of a multi-location hybrid is ready while another is not. |

**3. New Regulation 25A – Scheduling of infirm power**

| Observation | Suggestion |
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| Allowing scheduling only after a successful trial-run certificate, prioritising contracted buyers (with a seven-day notice), and permitting third-party sale upon deemed refusal is a | The advance notice period for offering power to contracted buyers may be reduced from seven days to three days, consistent with the reduced trial-run notice period under Regulation 21. This will enable faster monetisation of infirm power without compromising the buyer's opportunity to respond. It may also be clarified that, for REGS and ESS, such infirm power continues to be settled under the applicable |

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| balanced and welcome framework. | DSM Regulations and does not attract additional charges merely because of the sale route chosen. |

**4. Regulations 24 and 30 – Automatic operation and primary response for PSP and ESS**

| Observation | Suggestion |
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| Extending AGC enablement and primary-response obligations to PSP >25 MW and ESS (excluding PSP) of appropriate size, with capability linked to CEA Technical Standards, is essential for system security as RE penetration rises. | A clear prospective effective date (or phased applicability for projects achieving COD after a specified date) may be provided so that existing and under-construction projects are not unexpectedly burdened.<br>Since CEA has issued draft Connectivity Standards covering BESS and PSP droop/dead-band requirements, the final Grid Code may cross-reference the notified CEA standards and confirm that compensation for primary response from ESS will be governed by the Ancillary Services Regulations. This will encourage investment in grid-supportive storage (including storage co-located with green-hydrogen facilities for electrolyser stability).<br>Technical guidelines specific to inverter-based BESS (as distinct from synchronous PSP) may be issued promptly by NLDC/CEA to ensure uniform compliance testing during FTC and trial run. |

**5. Regulation 27 – Delinking of COD from PPA conditions**

| Observation | Suggestion |
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| The proposed proviso that Grid Code COD is declared after successful trial run, while contractual conditions under the PPA must still be met before supply under the contract, is a significant and necessary reform. It correctly addresses the practice of delaying COD of ready components in hybrid or multi-location projects. | RESI fully supports this change and requests only a minor clarification that the declaration of Grid Code COD for an individual unit/component shall not be withheld solely because other units or the overall project have not yet met PPA conditions. This will improve cash-flow certainty for developers and lenders without affecting buyer rights under the contract. |

**6. New Regulation 30A – Congestion charge**

| Observation | Suggestion |
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| Incorporating congestion-charge provisions into the Grid Code, including the treatment of simultaneous congestion in a wheeling region, and | In the detailed procedure, it may be expressly provided that under-injection by a REGS caused by resource variability within forecast tolerance, or by instructions of the system operator, shall not attract congestion charges in an exporting control area. RE remains a must-run resource; commercial signals should not inadvertently penalise legitimate variability or system-operator-directed curtailment. A reasonable threshold |

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| providing for a detailed procedure by NLDC is logical. | (or exemption window) consistent with forecasting accuracy norms would maintain the deterrent effect against deliberate deviations while protecting genuine RE operations. |

**7. Regulation 45(16) – Regulation of access to defaulting entities**

| Observation | Suggestion |
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| The progressive regulation of access for non-payment of DSM, congestion and reactive charges is understandable for pool-account discipline. | For REGS and ESS, temporary or modest DSM shortfalls arising from inherent variability should not immediately trigger the strictest access restrictions. A short cure period or a higher progressive threshold before T-GNA/GNA regulation is applied would prevent disproportionate impact on renewable projects while still ensuring recovery of statutory dues. Restoration upon payment should remain prompt, as already proposed. |

**8. Cross-cutting considerations for green hydrogen and hybrid systems**

While the Draft does not contain dedicated green-hydrogen provisions, several changes will directly affect NGHM projects that rely on captive or co-located RE and ESS for electrolyser operation. RESI requests that:

- Co-located ESS used primarily for electrolyser stability or firming of RE for green hydrogen be treated under the hybrid/ESS trial-run and COD rules with the same flexibility as standalone ESS.
- Scheduling and infirm-power provisions under Regulation 25A be applied uniformly so that green-hydrogen projects can monetise power during the pre-COD phase without unnecessary procedural hurdles.
- Any future detailed procedures on primary response, congestion and reserves take into account the operational characteristics of hybrid RE+ESS systems supporting hydrogen production.

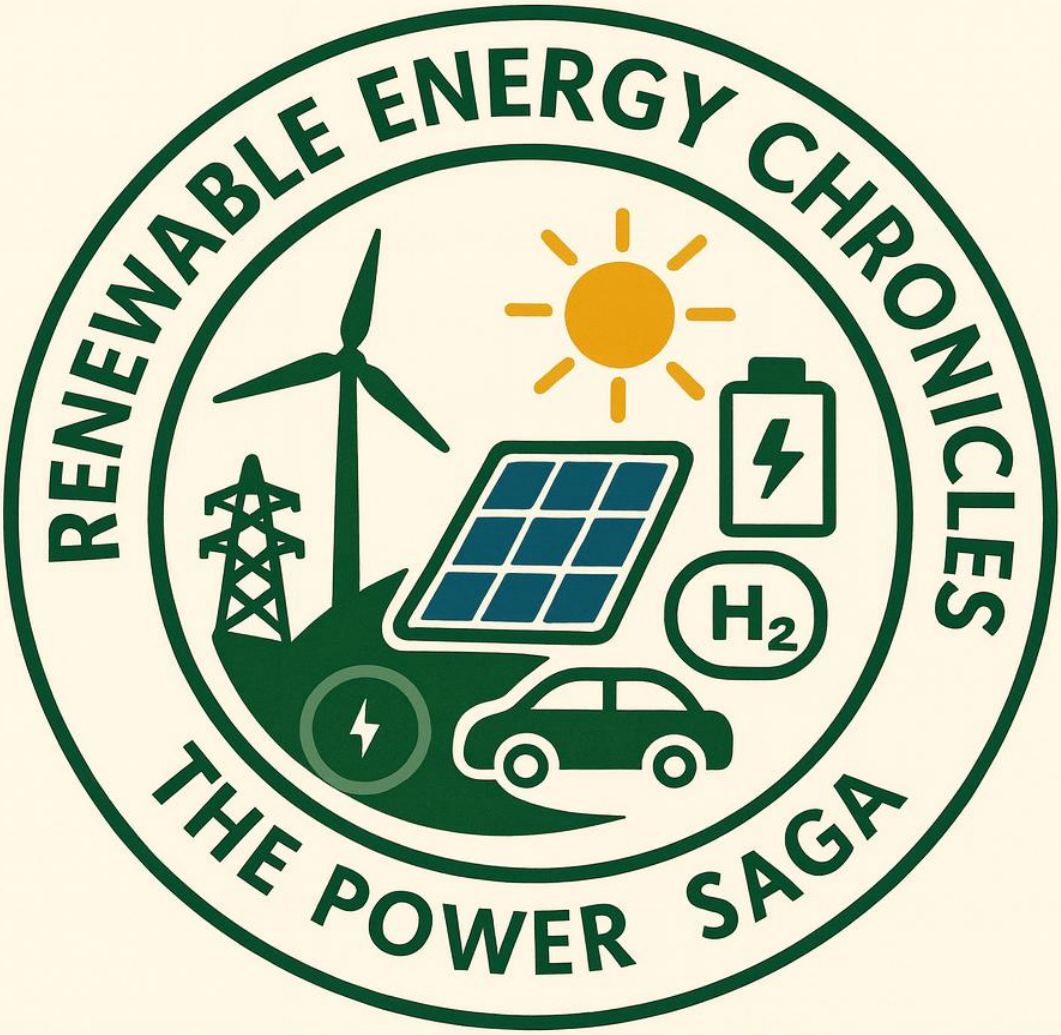
RESI believes that the Draft Second Amendment, with the limited clarifications and refinements suggested above, will materially accelerate the commissioning and grid integration of renewable and storage capacity. We remain available for any further discussion or clarification the Hon'ble Commission may require.

Sincerely,



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# RENEWABLE ENERGY SOCIETY OF INDIA




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## Brief of Renewable Energy Society of India

The Renewable Energy Society of India (RESI) is a premier, not-for-profit national institution committed to advancing India's clean energy transition through policy advocacy, technical research, and capacity building. Established by a consortium of experts from government, academia, regulatory bodies, and the renewable energy industry, RESI serves as a neutral platform to facilitate informed dialogue and evidence-based policymaking in the power sector.

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