========== Forwarded message ==========
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Date: Mon, 02 Nov 2026 17:00:49 +0530
Subject: Comments on the Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026
========== Forwarded message ==========

Respected Sir/Mam,

Greetings from Resolven!

Resolven (Formerly Zelestra) is a next-generation vertically integrated, multi-technology Indian renewable energy platform with a ~5.5 GW pipeline and a strategic ambition to deliver 10 GW of high-quality renewable assets by 2030. With a sharpened strategic focus on disciplined growth, operational excellence, digitalisation, and capital efficiency, the company is committed to accelerating India?s clean energy transition while delivering long-term value to stakeholders. The company is led by an experienced and committed leadership team, built on the foundation established and strengthened under Zelestra. Resolven is powered by EQT, one of the world?s largest private markets firms with EUR 270 billion in total assets under management.

Hon'ble Commission has issued the Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026 vide Public Notice No. L-1/265/2022/CERC dated 21.09.2026 and for inviting comments, suggestions, and objections from stakeholders. The last date to submit comments was 02.11.2025. I am writing to formally submit our comments and suggestions for the same. Please find the detailed comments/suggestions attached for your kind consideration.

Yours sincerely

Comments on Draft IEGC – Second Amendment

Resolven comments on the Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026

Clause No	Existing Provision Draft 2nd Amendment	Suggested Changes	Rationale
Para-4	**Para 4 – Regulation 21(1): Notice for trial run reduced from seven days to three days**	(a) We support the Hon'ble Commission's proposal on reduction of trail run notice from 7 days to 3 days. (b) Consequentially, amend Regulation 21(3) so that RLDC allows commencement of the trial run within three (3) days, rather than seven, of the proposed date in case of system constraints.	The benefit of a shorter notice is lost if the RLDC can still defer commencement by seven days.
Para 5 (1,2,3)	**Para 5(1)–(3) – Regulation 22(3)(a): Trial run of solar in instalments** Projects > 50 MW and < 250 MW: balance capacity in maximum four instalments with minimum 5 MW. Projects ≥ 250 MW: instalments of minimum 50 MW with no limit on number.	Hon'ble Commission is requested to allow for projects ≥ 250 MW, permit the last instalment to be of a capacity less than 50 MW, i.e., the balance capacity.	The installed capacity of large Solar projects is often not an exact multiple of 50 MW. A 270 MW project, for example, would leave a balance of 20 MW after five instalments of 50 MW. If the last instalment must also be at least 50 MW, this balance capacity cannot be declared under trial operation on its own. The developer would then have to hold back part of a capacity that is ready or wait to combine it with an earlier instalment. Either way, ready capacity sits idle, generation is lost, and the developer risks penalties for delayed commissioning under its PPA. Its small size has little effect on grid operation. Allowing the last instalment to be the balance capacity would therefore remove an avoidable barrier without any risk to grid security
Para 5(5&6)	**Para 5(5)&(6) – Regulation 22(3)(e): Trial run of standalone ESS** Minimum 50 MW; for ESS > 50 MW and < 250 MW, balance in maximum three instalments	Hon'ble Commission is requested the following:	The Explanatory Memorandum states that the provisions for ESS are proposed 'in line with' solar; the lower number of instalments is inconsistent with that intent. Charging energy availability and grid constraints may prevent

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	of minimum 5 MW; ≥ 250 MW in instalments of minimum 50 MW.	(a) Allow four instalments, rather than three, for ESS between 50 and 250 MW, in parity with solar. (b) Clarify how 'one cycle of charging and discharging' applies to an instalment: it should be demonstrated for the instalment capacity (MW/MWh) only. (c) For ESS co-located with RE (hybrid or FDRE), permit trial runs of ESS instalments aligned with the corresponding RE instalments. (d) If grid constraints prevent full-rated discharge, allow COD with demonstration within one year, as provided for solar and wind.	full-capacity cycles at the trial-run stage. Lack of a relaxation similar to solar/wind may unnecessarily delay COD of storage assets critical for RE integration.
Para 7	**7. Amendment to Regulation 25 of the Principal Regulations:** Regulations as under: **"25A Scheduling of infirm Power** (1) The scheduling of infirm power shall be allowed only post issuance of a certificate of successful trial run as per Regulation 25 of these Regulations. (2) If the generating station or ESS has entered into a contract either directly or through REIA or intermediary procurer for sale of power from such generating station or ESS, and such contract have specific provisions for treatment of sale of power prior	Hon'ble Commission is requested to Allow scheduling of infirm power from the date of successful completion of the trial run, pending issuance of the RLDC certificate	Regulation 19 allows interchange of infirm power from FTC approval, whereas the new Regulation 25A restricts scheduling to the post-trial-run stage. Without clarification, energy injected during testing may be treated as pure deviation. That exposes developers to DSM charges on energy that is unavoidable during commissioning. Linking scheduling to the date of the trial run (rather than the certificate) avoids loss of energy due to administrative timelines

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	to achieving commercial operation, the same shall be scheduled to the buyer(s) as per the provisions of such Contract. (3) In the absence of any specific provisions of treatment of sale of power prior to achieving commercial operation under the contract ….		
Para 16	Amendment to Regulations 48 and 49 to facilitate shortening of timeline between revisions: … The Regulation proposes reduction in revision timelines 6th-7th time block until 31 March 2027 and 5th-6th time block from 1 April 2027	We request the Hon'ble Commission to consider reducing the revision timeline to the 4th–5th time block from the date of notification of the amendment, in place of the proposed two-phase approach	The Staff Paper titled "Shortening the Scheduling Timeline for Real Time Market in India" was published on 06.05.2026. It proposed reducing the interval between the right to revision and actual delivery of power from 75 minutes to 50 minutes, by shortening the RTM bidding window from 15 to 5 minutes and the time between RTM clearing and delivery from 45 to 30 minutes. A revision timeline of the 4th–5th time block, about 45–60 minutes, matches this 50-minute target. The proposed 6th–7th and 5th–6th timelines, about 75–90 and 60–75 minutes, would leave schedule revisions behind the RTM timeline the Commission is already considering. Both the phased reduction in the draft and the Staff Paper show that a shorter timeline is technically feasible, and scheduling at NLDC and RLDCs is largely automated. An interim phase until 31.03.2027 would therefore only postpone benefits that are already within reach. Shifting to a 4th–5th time block regime would allow more accurate demand forecasting, because schedules could be revised closer to real time. This would reduce demand–supply mismatches and exposure to deviation charges under the DSM. Electricity demand changes constantly with weather, public holidays, social events, festivals and supply disruptions, and much of this can be predicted reliably only close to

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			delivery. RE generators would similarly be able to forecast generation more accurately, and RE curtailment caused by grid constraints could be reduced through quicker schedule corrections. DISCOMs and RE generators could correct their schedules using more current information, which would lower deviations and DSM costs. Fewer large imbalances would reach the system operator, supporting grid stability. The Hon'ble Commission is therefore requested to adopt the 4th–5th time block revision timeline from the date of notification of the amendment.
New Comment	Regulation 49(11)(b) of the Principle IEGC, 2023 Regulation required NLDC to submit a procedure for aggregation of pooling stations by November 2023. It has not been issued, and CERC's Draft Second Amendment is silent on it.	The Hon'ble Commission is requested to direct Grid-India (NLDC) to finalise and issue the procedure for aggregation of pooling stations under Regulation 49(11)(b) of the Principal Regulations, after stakeholder consultation. This should be done at the earliest, and in any case within 60 days of notification of the Second Amendment Regulations.	The Indian power system has operated as a single synchronous grid since December 2013 under "One Nation – One Grid – One Frequency". Grid-India operates the system against a single all-India frequency. Frequency and grid security are affected by the net deviation of the grid as a whole, not by the deviation of any one generating station or pooling station. Wind and solar stations are spread across different pooling stations and regions, so their deviations are not fully correlated and tend to offset one another. Assessing each station or pooling station separately penalises generators for deviations that, taken together, have little or no effect on grid frequency. This raises the cost of renewable energy without a corresponding benefit to the grid. Issuing the aggregation procedure would bring DSM liability in line with the actual impact on the grid and give RE generators regulatory certainty

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