========== Forwarded message ==========
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Date: Mon, 02 Nov 2026 18:08:24 +0530
Subject: RE: Submission of Comments on Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026
========== Forwarded message ==========

Respected Sir,

With reference to our earlier submission of comments on the Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026, please find attached the updated file incorporating **one additional comment on Regulation 27**, ***concerning the procedure for issuance of CTU completion certificates where no-load charging is not possible for reasons beyond the control of the transmission licensee.***

The remaining comments are unchanged. Request you to kindly consider the updated file, incorporating this additional comment, as part of Resonia Limited's submission.
Thanking you.

Yours faithfully,
Aniket Singh
Asst. Manager – Policy & Regulatory
Resonia Ltd.

Comments of Resonia on Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026

Draft Provision- Regulation / Clause	What is proposed	Resonia's Comment	Rationale / Justification
Regulation 21 - Notice of Trial Run, Clause (1) and Clause (2)	Paragraph 4 of the Draft Amendment: **"The word and number 'seven (7)' shall be substituted with the word and number 'three (3)' in Clause (1) of Regulation 21 of the Principal Regulations."** The proposed amendment reduces the notice period for trial run/trial operation of generating stations under Regulation 21(1) from seven days to three days. However, no corresponding amendment has been proposed to Regulation 21(2), which applies to transmission systems and elements.	Resonia recommends that the proposed reduction in the notice period from seven days to three days also be extended to Regulation 21(2), so that the notice period applicable to trial operation of transmission systems and elements is aligned with that proposed for generating stations. Accordingly, the proposed amendment may be revised as follows: **"The word and number 'seven (7)' shall be substituted with the word and number 'three (3)' in Clauses (1) and (2) of Regulation 21 of the Principal Regulations."**	The Explanatory Memorandum states that there is no reason to wait seven days once a generating unit is ready for trial operation. The same rationale applies to transmission systems and elements, as reducing the notice period would facilitate timely trial operation and avoid procedural delays. Trial operation of transmission elements is dependent on several interrelated activities, including statutory energization approvals, protection and control testing, readiness of associated systems, availability of telemetry and communication facilities, shutdown approvals, prevailing grid conditions, and issuance of charging or switching codes by the concerned Load Dispatch Centre. Consequently, the actual trial-operation date may change due to circumstances beyond the transmission licensee's control. Retaining the seven-day notice requirement under **Regulation 21(2) may necessitate issuance of fresh notices and lead to avoidable delays in trial operation**, with consequential implications for the grant of the Transmission Operational Certificate (TOC), declaration of COD and

Draft Provision- Regulation / Clause	What is proposed	Resonia's Comment	Rationale / Justification
			commencement of transmission charges. Aligning the notice period under both clauses would provide greater operational flexibility while facilitating timely commissioning of transmission systems and elements.
Regulation 27 - Commercial Operation Date, Clause (1), sub-clause (e)(i), proposed proviso	A new proviso is proposed after Regulation **27(1)(e)(i).** It provides that where the contract of a generating station/ESS contains conditions other than those prescribed in the Grid Code as prerequisites for commercial operation, those conditions must be fulfilled before power is supplied under that contract; **however, the generating station/ESS may declare COD for the purposes of the Grid Code after successful trial run under the Grid Code.**	Resonia recommends that the provision expressly clarify that declaration of COD by a generating station/ESS for the purposes of the Grid Code **shall not, by itself, establish readiness or default of the associated transmission system.**	This provision creates a potentially important distinction between **Grid Code COD and contractual/commercial readiness**. Read with proposed Regulation 22(3)(j), a generator could obtain Grid Code relief/COD despite an evacuation constraint. **The Grid Code should ensure that such generator-side treatment does not automatically translate into an adverse finding against an associated transmission licensee.** The 11/SM/2024 order also demonstrates CERC's approach of treating trial-run certification and Grid Code compliance as **specific technical/system requirements rather than automatically equating them with every contractual consequence.**
Draft Paragraph 9(1) – Amendment to Regulation 27, read with Regulation 27(1)(c)(i), fifth	Paragraph 9(1) proposes insertion of the words **"Central Transmission Utility"** after the words "the concerned RLDC" in Clause (1) of Regulation 27, thereby including CTU among the entities to whom	Resonia supports the proposed amendment. Additionally, the Commission may consider providing further clarity on the scope and procedure for issuance of the CTU completion certificate under the fifth	The existing provision recognizes that no-load charging may not always be possible and accordingly requires an RLDC no-load charging certificate only where such charging is possible. Further, Paragraph 36.3.1 of the Statement of Reasons to the IEGC, 2023

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proviso of the Principal Regulations	COD declarations are to be communicated. The existing fifth proviso to Regulation 27(1)(c)(i) also provides for issuance of a CTU completion certificate and an RLDC no-load charging certificate, wherever no-load charging is possible, for declaration of deemed COD by TBCB transmission licensees.	proviso to Regulation 27(1)(c)(i), particularly in circumstances where no-load charging is not possible for reasons not attributable to the transmission licensee. The provision may specify the circumstances under which no-load charging shall be considered not possible, the nature of explanation and supporting documents to be furnished by the transmission licensee, and the parameters for verification of completion of the transmission element. It may also clarify that, in such circumstances, the CTU completion certificate may be processed on the basis of verification of completion against the applicable bidding specifications, TSA scope and CEA Standards, read with the explanation and supporting documents furnished by the transmission licensee. Accordingly, Resonia proposes insertion of an additional proviso and Explanation after the existing fifth proviso to Regulation 27(1)(c)(i).	explains that the CTU certificate is intended to provide an additional verification of the completion of the transmission element in accordance with its scope of work. However, the circumstances in which no-load charging may be treated as not possible, together with the corresponding documentary requirements and assessment parameters, are not expressly specified in the Regulations. CTUIL's SOP (Revision 2) dated 18.07.2025 also provides for submission of an explanation by the transmission licensee where no-load charging has not taken place due to any reason. In this context, prescribing an indicative list of qualifying circumstances and a uniform documentary framework would facilitate consistent implementation of the existing provision. Such circumstances may include non-availability of upstream/downstream transmission systems, non-approval or deferment of shutdowns due to grid-security requirements, prevailing voltage/loading conditions, system-operation instructions, and approvals or clearances pending with other agencies despite compliance by the transmission licensee. This would provide greater regulatory certainty regarding the certification process and ensure that

Draft Provision- Regulation / Clause	What is proposed	Resonia's Comment	Rationale / Justification
			transmission elements which are otherwise complete and ready for charging are assessed objectively for declaration of deemed COD in accordance with the applicable TSA provisions.
Regulation 30A - Congestion Charge, Clause (1)(a) & (b)	New Regulation 30A(1)(a) provides that the congestion charge shall be payable by a **Regional entity or entities causing congestion** in an inter-regional or intra-regional link and receivable by Regional entity/entities relieving congestion. It further identifies over-drawal/under-injection in the importing control area and under-drawal/over-injection in the exporting control area as situations for levy of the congestion charge.	Resonia recommends that the Commission **clarify the scope of the expression "Regional entity or entities causing congestion" and the criteria for attribution of congestion charges.** In particular, the mere ownership or operation of a transmission element on which congestion occurs, or the occurrence of a transmission outage or network constraint, should not, by itself, render the concerned transmission licensee liable for congestion charges. The detailed procedure should identify the Regional entity whose deviation falls within the specified charging criteria and establish its contribution to the congestion, taking into account relevant network conditions and operational constraints. **Any liability arising from the non-availability or outage of a transmission element**	The proposed expression is **"entity/entities causing congestion"**, but the draft does not set out a specific causation test for transmission licensees. A transmission corridor may become constrained because of another network element, N-1 security requirements, an upstream/downstream constraint, system-operator directions, planned/forced outages or third-party circumstances. Therefore, the **location of congestion should not be equated with its legal causation**.

Draft Provision- Regulation / Clause	What is proposed	Resonia's Comment	Rationale / Justification
		should be determined under the applicable regulatory and contractual framework, rather than presumed solely from the location of congestion. The above clarification should apply equally to Regulation 30A(1)(b), so that the application of congestion charges in a wheeling region does not create any additional or independent liability for a transmission licensee merely because its transmission system forms part of an affected import or export corridor.	