========== Forwarded message ==========
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Date: Wed, 21 Oct 2026 22:54:12 +0530
Subject: Comments and Suggestions on the Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026
========== Forwarded message ==========

Dear Sir/Madam,
Please find attached Comments and Suggestions on the Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026, for your kind consideration.

With best regards
Milind Nigudkar
Vice President (Commercial), SEIL Energy India Ltd.
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# Comments on Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations by SEIL Energy India Ltd.

SEIL appreciates the proposed amendments to the IEGC and submits the following comments on provisions having operational, commercial, or implementation implications for thermal generating stations.

**Regulation 30A – Congestion Charge**

The amendment expands congestion charge applicability to entities in the wheeling region.

**SEIL Submission:** Detailed methodology, computation, settlement mechanism, and liability allocation for congestion charges should be specified before implementation. Stakeholder consultation may be undertaken prior to finalisation of the detailed procedure. Any congestion charge framework should be transparent, predictable, and non-discriminatory in its application.

**Regulation 45 – Declared Capacity During Peak Hours and Regulation of Access**

The amendment introduces regional entity thermal generating stations shall not declare the declared capacity in the Peak hours less than declared capacity in the off-peak hours, other than in case of forced outage or partial outage, failing which declared capacity for such generating station for the purpose of fixed charges shall be taken as the lower of the two and provisions relating to access restrictions for defaulting entities.

**SEIL Submission:** The proposed provision creates ambiguity regarding fixed charge recovery where lower DC is declared during peak hours. A detailed implementation methodology should be developed in consultation with stakeholders. Further, adequate safeguards should be incorporated before restricting grid access, including prior notice and opportunity for representation.

**Regulation 48 – Alternate Power Supply**

The amendment further clarifies alternate power supply provisions and introduces express consent and sharing arrangements.

**SEIL Submission:** The Commission may retain the existing regulatory position. In alternate power procurement arrangements, all costs and commercial risks are borne by the generator and beneficiary concurrence is obtained as per contractual provisions. Therefore, mandatory profit-sharing or savings-sharing with the buyer may not be appropriate.

**Regulation 48 & 49 (Phase-I)**

Scheduling revision timelines are proposed to be reduced and aligned with RTM scheduling, 8$^{th}$ block will be substituted with 6$^{th}$ block.

**SEIL Submission: SEIL requests to provide** adequate transition time for implementation. Comprehensive testing, trial runs, and stakeholder awareness programmes should be undertaken before the revised timelines become effective.

**Regulation 48 & 49 (Phase-II)**

Further reduction in scheduling revision timelines is proposed 7th block will be substituted with 5th block.

**SEIL Submission:** Phase-II implementation may be considered after successful stabilization of Phase-I and completion of impact assessment in consultation with stakeholders. System readiness should be demonstrated prior to migration.

SEIL also submits that:

• The existing 15-minute RTM bidding window should be retained until operational ecosystems mature adequately.

• Alternatively, differentiated timelines may be considered for generators having multiple contracts and complex scheduling portfolios.

• Compression of bidding windows should only be considered after implementation of robust automated contract-wise URS allocation and scheduling tools across all stakeholders.

• A detailed pilot study involving multi-beneficiary thermal generators should be conducted before sector-wide implementation.