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From: Member Secretary SRPC <mssrpc-ka@nic.in>
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Date: Mon, 09 Nov 2026 15:24:09 +0530
Subject: Additional comments on IEGC 2nd Amendment of SRPC secretariat
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महोदय /महोदया
Sir/Madam

Further addittional comments to IEGC 2nd Amendment are attached for kind consideration.

भवदीय Regards
सदस्य सचिव Member Secretary

Additional Comments of SRPC Secretariat on Draft Second Amendment to IEGC Regulations, 2026

CERC (Indian Electricity Grid Code) Regulations, 2023	
Regulation	**Comments**
44. RESPONSIBILITIES OF LOAD DESPATCH CENTRES (c) Scheduling of electricity within the region which includes: (i) Injection and drawal schedules for regional entities, cross-border entities, in accordance with the contracts; **48. SCHEDULING FROM ALTERNATE SOURCE OF POWER BY A GENERATING STATION** (1) A generating station may supply power from alternate source in case of (i) USD in terms of clause (1) of Regulation 47 of these regulations or (ii) forced outage of unit(s) or (iii) a generating station other than REGS replacing its scheduled generation by power supplied from REGS irrespective of whether such identified sources are located within or outside the premises of the generating station or at a different location.	Simultaneous injection and drawl of power is not allowed, except in cases of forced outages of generating units, replacement with REGS, SCED and SCUC as per extant IEGC provisions. However, there are clear gain sharing mechanism between Generators and beneficiaries under SCED and SCUC. There is also gain sharing mechanism a generating station other than REGS replacing its scheduled generation by power supplied from REGS. Generally, in case of Forced Outages, the power arranged by generators is generally costlier than the replaced power and mostly the power is not arranged by the generators leaving it to be settled through DSM. With ESS coming into picture and whenever multiple contracts are there with ESS there are inevitable simultaneous injection and drawal schedules in same time block. It was also noted that presently the scheduling is based on physical delivery and such netting may lead to arbitrage or circular trading, therefore Regulatory Oversight is very much essential. With likely increase in Energy Storage Systems (PSPs / BESS and number of cycles increasing, a suitable regulated solution needs to be evolved to address such cases. Member Secretary, SRPC vide letters dated 15.01.2026 & 03.09.2026, had sought guidance for formulation of a procedure to facilitate simultaneous injection and drawal in the same time block. It may be noted that other generators will be not at par if only ESS is allowed simultaneous injection and schedule in the same time block. Further some units of PSP or some module of BESS run in Injection mode while other run-in drawl mode does not make sense and may not be technically viable also. There are likely gains with respect to Round Trip Efficiency and losses if simultaneous injection and schedules are allowed with respect to, if these transactions are to be taken place independently. It may be noted that these are not efficiency gains but are

	gains incidental to allowing simultaneous injection and schedules to fulfill the contractual obligations and the nature of Energy Storage Systems. Further, with respect to Round Trip Efficiency and losses gains, the Commission may consider permitting such netting and prescribe an appropriate mechanism for accounting and treatment of the resultant netting gains. It may further be noted that ESS may further gain by availing cheaper power/ selling costlier power to net off the schedules which are not being considered in the above. **<u>Suggestions:</u>** The net gains arising from simultaneous injection and drawal while scheduling may be recovered from the ESS and credited back to the Deviation and Ancillary Pool Account. Such gains may be settled at some suitable rate for the respective time block/or as a week as a whole. For example, 75% of Gains can be transferred to the Deviation and Ancillary Pool Account. NLDC may come out with a Procedure in this regard.

Illustration of Net Gains for Net Injection and Drawl scenario:

Sl.No.	ISTS Periphery			ESS Periphery (2% loss)			Net Gains				
	Generation Schedule (MW)	Drawl Schedule (MW)	Net Schedule (generation (+) & pump (-))	Generation Schedule (MW)	Drawl Schedule (MW)	Net Schedule (generation (+) & pump (-))	ISTS Net Schedule, generation/pump at ESS Periphery, after 2% loss applied, if simultaneous injection and drawl schedule is allowed	Generation Gains in MW (due to saving in internal Loss)	Round Trip Efficiency Gains (say 15%) in MW	Total Gain (MW)	Total Gains (Rs.) considering Rs.5/kWh
	A	B	C=A-B	D=A/0.98	E=B/0.98	F=D-E	G=C/0.98	H=G-C	I=0.15*Min(abs(D), abs(E))	J=H+I	K=J*5*250
1	500	130	370	510	128	382	377	5	19.2	24.2	30,250
2	470	810	-340	479	794	-314	-347	32	71.85	103.85	129,813
3	940	800	140	959	784	175	143	32	117.6	149.6	187,000
4	710	920	-210	724	902	-177	-214	37	108.6	145.6	182,000
5	500	500	0	510	490	20	0	20	73.5	93.5	116,875