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From: Member Secretary SRPC <mssrpc-ka@nic.in>
To: "Harpreet Singh Pruthi"<secy@cercind.gov.in>, "Awdhesh Kumar Yadav"<chiefengg@cercind.gov.in>, "Shilpa Agarwal"<shilpa@cercind.gov.in>
Date: Mon, 19 Oct 2026 11:28:51 +0530
Subject: SRPC secretariat comments on Draft IEGC 2nd A
========== Forwarded message ==========

महोदय /महोदया
Sir/Madam

Please find SRPC secretariat comments on Draft IEGC 2nd A for kind consideration.

भवदीय Regards
सदस्य सचिव Member Secretary

SRPC secretariat Comments on Draft IEGC 2023 second amendments

Serial No/ Page no/ Regulation No	As in draft	Suggested	Comment/Reason
2(1)/Page 1 Regulation 29a	29a. 'Congestion charge' means the supplementary charge levied on regional entity, when the net injection or net drawal of power in the inter-regional or intra-regional transmission links exceeds the Total Transfer Capability;	It is felt that concept of Regional Entity to resolve congestion issues may not work always in present scenario. States may be injecting at some nodes while overdrawing as a state. In addition node wise congestion should also be made applicable. These scenarios are not adequately covered in IEGC or Congestion Regulation/Procedure. Further the RTDA is done on Net Drawl (Total drawl – Total injection) therefore the Entity may be using ISTS to draw its power without adequately paying for it.	
2(1)/Page 1 Regulation 35a	35a. 'Default trigger date' (i) In case of non-payment of dues, shall be 75 days after the issue of respective account by the Regional Power Committee, and; (ii) In case of non-maintenance of the payment security mechanism, shall be the next bank working day after the payment security mechanism is due to be replenished but is not replenished;	35a. 'Default trigger date' (i) In case of non-payment of dues, shall be 75 days after the issue of respective account by the Regional Power Committee, and; (ii) In case of non-maintenance of the payment security mechanism, shall be the next bank working day after the payment security mechanism is to be established or due to be replenished but is not replenished;	Some cases PSM requirement may be new
3(2)/Page 2 Regulation 19(3) (a)	(i) Concerned REGS or ESS (except Hydro PSP ESS) shall inform the detailed reasons for delay in achieving the COD along with the likely date by which it	(i) Concerned REGS or ESS (except Hydro PSP ESS) shall inform the detailed reasons for delay in achieving the COD along with the likely date by which it may make a request seeking extension of	To avoid ambiguity

	may make a request seeking extension of the period for injection of infirm power.	the period for interchange of infirm power. ~~injection of infirm power.~~	
3(2)/Page 2 19(3)(a)(iv)	Concerned REGS or ESS (except Hydro PSP ESS) shall keep RLDC informed of the activities to be carried out on monthly basis due to which such extension has been sought by the entity.”	Concerned REGS or ESS (except Hydro PSP ESS) shall keep RLDC informed of the activities to be carried out on ~~monthly~~ 10 days basis due to which such extension has been sought by the entity.”	Total extension allowed by RLDC is 3 months so monthly report may not be sufficient and days/weekly report may be required.
4(1)/Page 2 Regulation 21(1)	The generating company proposing its generating station or a unit thereof for trial run or repeat of trial run shall give a notice of not less than ~~seven (7)~~ three (3) days to the concerned RLDC, and the beneficiaries of the generating stations, including intermediary procurers, wherever identified: Provided that in case the repeat trial run is to take place within forty eight (48) hours of the failed trial run, fresh notice shall not be required.	The generating company proposing its generating station or a unit thereof for trial run or repeat of trial run shall give a notice of not less than three (3) days (excluding the day of notice) to the concerned RLDC, and the beneficiaries of the generating stations, including intermediary procurers, wherever identified: Provided that in case the repeat trial run is to take place within forty eight (48) hours of the failed trial run, fresh notice shall not be required.	For clarity
5(8)/Page 3-4 Regulation 22(3)(f) & Regulation 27(b-i)	Successful trial run of a pumped storage plant shall mean one (1) cycle of turbo generator and pumping motor mode as per the	Is there a need to specify hours as an option, like 4 hours in pump and 4 hours in generation mode	

	design capabilities up to the rated water drawing levels with the requisite metering, telemetry and protection system being in service.		
7(1)/Page 5 Regulation 25A(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 to achieving commercial operation, the same shall be scheduled to the buyer(s) as per the provisions of such Contract.	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 to achieving commercial operation (Same clause will be applicable of part COD), the same shall be scheduled to the buyer(s) as per the provisions of such Contract.	It has been seen that few generators are declaring Part COD but not offering the power to original beneficiary citing that the clause is applicable after complete COD. Therefore there may be clarity that whatever clauses are applicable for complete COD will be applicable for Part COD and scheduling after successful Trial Run.
11(1)/Page 8-9 Regulation 30A	30A. CONGESTION CHARGE (1) Applicability of Congestion Charge. (3) Notice for application of congestion charge. (4) Notice for withdrawal of congestion charge.	It is felt that concept of Regional Entity to resolve congestion issues may not work always in present scenario. States may be injecting at some nodes while overdrawing as a state. In addition node wise congestion should also be made applicable. These scenarios are not adequately covered in IEGC or Congestion Regulation/Procedure. Further the RTDA is done on Net Drawl (Total drawl – Total injection) therefore the Entity may be using ISTS to draw its power without adequately paying for it.	
12(2)/Page 10-11 Proviso after the second proviso of sub-clause (a) of Clause (8) of Regulation 45	Provided also that regional entity thermal generating stations shall not declare the declared capacity in the Peak hours less than declared capacity in		Agree with the amendment as lot of issues were being faced in SR.

	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		
12(3)/Page 11 Regulation 45(16) (a)	In case of non-payment of dues of the statutory charges viz DSM charge, congestion charge, reactive energy charge payable under applicable Regulations	In case of non-payment of dues of the statutory charges viz DSM charge, congestion charge, reactive energy charge, etc payable under applicable Regulations	To cover all other Regulatory charges like Ancillary Charges etc
12(3)/Page 11 Regulation 45(16)		New clause (c) A detailed procedure for Regulation of access to defaulting entities shall be prepared by NLDC in consultation with stakeholders within 60 days of notification of this Regulation and approved by the Commission.	It is suggested that NLDC may come out with Procedure for different accounts, PSM, dates of uploading, default trigger dates, objection handling and resolution etc.
12(3)/Page 11 Regulation 45(17)	**Scheduling of Free Power share of State Government from bus bar of Central Hydro Generating Station** The State Government having free power share in Central Hydro Generating Station (CHGS) may sell their entitled share of free power directly from the bus bar	It is opined that there are revisions of DC by Generating Station and how to treat changes in DC are settled as per IEGC provisions. Further though there may be provisions for State Govt to bring down the deviations through market during change in DC, however the option may not be used passing on the deviation to the grid. However, the change in Deviation Settlement Mechanism to cater to specific requirement may require relook. The state government share can be shown under Discom as separate head without applicability of losses and not affecting the GNA of the Discom. There will be DSM in name of DISCOM only and the change in DC cases may be settled between State	

	of the such hydro generating station. The scheduling, accounting, and deviation settlement for the sale of free power share in the Central Hydro Generating Stations from the bus bar of Generating Station by the State Government shall be as per the Procedure at Annexure 8 of these regulations.	Government and Discom through Procedure. Else it is suggested that like State Government Free Power can be treated as a beneficiary and changes in DC can be settled by State government and the generator outside DSM and for that Procedure can be made. There may be request by other generators/ESS in future and it would become very cumbersome to treat such cases.	
14/Page 13 Regulation 47(2)	"(2) The generating station shall plan USD such that the maximum number of units remain on-bar keeping in view the economy and efficiency of the units of the generating station. When the machine is going under USD: (a) In case the total requisitioned power can be supplied through other units in the same generating station on bar, the generator shall be scheduled according to the requisitions received. (b In case total requisitioned power cannot be supplied through other units in the same generating station on bar, the requisition from the beneficiaries shall be reduced in the ratio of	"(2) The generating station shall plan USD such that the maximum number of units remain on-bar keeping in view the economy and efficiency of the units of the generating station. When the machine is going under USD: (a) ***In case the total requisitioned power can be supplied through other units in the same generating station on bar, the generator shall be scheduled according to the requisitions received. (b) In case total requisitioned power cannot be supplied through other units in the same generating station on bar, the requisition from the beneficiaries shall be reduced in the ratio of requisitioned***	In (a) & (b) it is not clear that requisition means requisition at 15:30 on D-1 or requisition on D Day. What will be entitlements in such case? What will happen to sharing of Part Load compensation? USD attributable to which entities. A Procedure by NLDC would be required.

	requisitioned power. (c) In the special case of a generating station where the only running machine is going under USD, the beneficiaries who have requisitioned power will not get any power from that generating station.	***power.*** (c) In the special case of a generating station where the only running machine is going under USD, the beneficiaries who have requisitioned power will not get any power from that generating station. (d) A detailed procedure for Entitlement and scheduling to entities during USD shall be prepared by NLDC in consultation with stakeholders within 60 days of notification of this Regulation and approved by the Commission.	
Annexure -8		It is opined that there are revisions of DC by Generating Station and how to treat changes in DC are settled as per IEGC provisions. Further though there may be provisions for State Govt to bring down the deviations through market during change in DC, however the option may not be used passing on the deviation to the grid. However, the change in Deviation Settlement Mechanism to cater to specific requirement may require relook. The state government share can be shown under Discom as separate head without applicability of losses and not affecting the GNA of the Discom. There will be DSM in name of DISCOM only and the change in DC cases may be settled between State Government and Discom through Procedure. Else it is suggested that like State Government Free Power can be treated as a beneficiary and changes in DC can be settled by State government and the generator outside DSM and for that Procedure can be made. There may be request by other generators/ESS in future and it would	

		become very cumbersome to treat such cases.	
Annexure -8 Appendix I 3rd row	20 MW under\draw al by the State Government	20 MW Over draw al by the State Government	Please may be checked
Annexure -8 Appendix I 6th row	60 MW underdrawa l by the State Government	60 MW Over drawal by the State Government	Please may be checked
Annexure -8 Appendix I 7th row	60 MW underdrawal by the State Government	60 MW Over drawal by the State Government	Please may be checked
Annexure -8 Appendix I 8th row	60 MW underdrawal by the State Government	60 MW Over drawal by the State Government	Please may be checked
Principal Regulation/Page No	**As in Principal Regulation**	**Suggestion**	**Comment/Reason**
3(1)(123)/Page 23	means the Central Electricity Regulatory Commission (Terms and Conditions of Tariff) Regulations, 2019;	means the Central Electricity Regulatory Commission (Terms and Conditions of Tariff) Regulations, 2019 & 2024 as applicable;	Many new provisions are added in 2024 Tariff Regulations
7(1)(k)/Page 32	Central Electricity Authority (Cyber Security in Power Sector) Guidelines, 2021.	Central Electricity Authority (Cyber Security in Power Sector) Guidelines, 2021 till Central **Electricity Authority (Cyber Security in Power Sector) Regulations, 2026 are implemented**	CEA has notified Cyber Security Regulations 2026
21(2)/Page 46	The transmission licensee proposing its transmission system or an element thereof for trial run shall give a notice of not less than seven days to	The transmission licensee proposing its transmission system or an element thereof for trial run shall give a notice of not less than ~~seven~~ three days to	In line with Generating Station proposed amendment in 21(1)

	the concerned RLDC, CTU, distribution licensees of the region and the owner of the inter-connecting system.	the concerned RLDC, CTU, distribution licensees of the region and the owner of the inter-connecting system.	
21/Page 46		ESS may be included	
24(8)(a)/Page 57	The transmission licensee shall submit technical particulars including	The transmission licensee or User shall submit technical particulars including……	Many Bulk Consumer and generators may be required to commission SVC or STATCOM. May include SynCon also.
26(4)(a)/Page 60	…… has complied with all relevant provisions of CEA Technical Standards for Connectivity, CEA Technical Standards for Communication, Central Electricity Authority (Measures relating to Safety and Electricity Supply) Regulations,2010 and these regulations	…… has complied with all relevant provisions of CEA Technical Standards for Construction, CEA Technical Standards for Connectivity, CEA Technical Standards for Communication, Central Electricity Authority (Measures relating to Safety and Electricity Supply) Regulations,2010 and these regulations	CEA has notified Technical Construction Standards for RE and BESS on 22.06.2026
27(2)/Page 64	On declaration of commercial operation date, scheduling of the generating station or unit thereof, shall start from 0000 hours of D+2 (where D is the date when a generating station intimates the commercial operation of the generating station or unit thereof) or the commercial operation date declared by the	"On declaration of commercial operation date, scheduling of the generating station or unit thereof, shall start from 0000 hours of D+2 (where D is the date when a generating station intimates the commercial operation of the generating station or unit thereof) or the commercial operation date declared by the generating station or	It has been seen that few generators are declaring Part COD but not offering the power to original beneficiary citing that the clause is applicable after complete COD. Therefore there may be clarity that whatever clauses are applicable for complete COD will be applicable for Part COD and scheduling after

	generating station or unit thereof, whichever is later	unit thereof, whichever is later. For RE and ESS in respect of scheduling the clauses applicable for COD will be applicable for Part CoD and scheduling after successful Trial Run.	successful Trial Run.
Chapter 5/Page 43-64	There may be need to have Trial Run and COD declaration requirement for Bulk Consumers especially Data Centers and Green Hydrogen and derivatives.		
31(2)(d)/Page 90	Each SLDC shall submit node-wise morning peak, evening peak, day shoulder and night off-peak estimated demand in MW and MVA on a monthly and quarterly basis for the nodes 110 kV and above for the preparation of scenarios for computation of TTC and ATC by the concerned RLDC and NLDC.	Each SLDC shall submit node-wise morning peak, evening peak, solar peak, day shoulder and night off-peak estimated demand in MW and MVA on a monthly and quarterly basis for the nodes 110 kV and above for the preparation of scenarios for computation of TTC and ATC by the concerned RLDC and NLDC.	Resource adequacy at Solar Peak is also becoming critical. Plus adequacy of down reserves and USD decisions also it is required. It has impact on import and export TTC.
31(2)(f)/Page 91	The entities such as bulk consumers or distribution licensees that are directly connected to ISTS shall estimate and furnish such a demand estimate to the concerned RLDC.	The entities such as bulk consumers or distribution licensees that are directly connected to ISTS shall estimate and furnish such a demand estimate with time block granularity to the concerned RLDC.	For Data Centres Time Block granularity is important.
32(3)(d)/Page 95	Submission of LGBR of the control area to RPC for both peak and off-peak scenarios	Submission of LGBR of the control area to RPC for both Solar peak, Off Solar Peak and off-peak scenarios	

38(3)(iv)/Page 111	Demand met (peak, off-peak and average);	Demand met (Solar peak, off-solar peak, off-peak and average);	Solar peak is becoming very important.
45(15)/Page 131	Provided that where the generating station including a renewable energy generating station is unable to enter into a contract for the drawal of power during non generation hours, it may draw power from ISTS on payment of deviation charges as per the DSM Regulations.	Provided that where the generating station including a renewable energy generating station is unable to enter into a contract for the drawal of power during non generation hours, it may draw power from ISTS on payment of deviation charges as per the DSM Regulations. It may be noted that ESS will not draw power from grid for charging/pumping without schedules. Provide quantum of drawl or infirm injection is high RLDC in discussion with RPC may direct the entity to go for scheduled transaction.	For clarity ESS for auxiliary may draw from the grid but not for charging and pumping operation. Many a times during high frequency large infirm injection are seen, it would be better if they go through as scheduled transactions. Further during low frequency there may be significant drawls.
46(4)(e)/Page 133	The NLDC shall indicate the quantum of URS power to be kept as reserves, in the generation station or unit thereof brought under SCUC, and such quantum of power identified as reserves shall not be available for scheduling by the beneficiary or for sale by the generating station through the energy market. The quantum of power over and above the	This clause not implemented fully and may be putting constraint on D&A Pool Account.	

	identified quantum of reserves may be rescheduled by the beneficiary(ies) or scheduled by way of selling in the market.		
46(4)(j)/Page 133	The generating stations other than those whose tariffs are determined under Section 62 of the Act may opt to participate in SCUC as per the Detailed Procedure to be prepared by NLDC and approved by the Commission.	The generating stations other than those whose tariffs are determined under Section 62 of the Act ~~may opt~~ to participate in SCUC as per the Detailed Procedure to be prepared by NLDC and approved by the Commission.	They should participate unless with justifiable technical reasons.
49(3)(c)(iii)/Page 154	Switching on/off pump storage plants operating in pumping mode;	Switching on/off ~~pump storage plants operating in pumping mode~~ ESS;	BESS also increasing
50(2)/Page 162	All users, NLDC, RLDCs, SLDCs, CTU and STUs, power exchanges, QCAs, SNAs, shall have in place, a cyber security framework in accordance with Information Technology Act, 2000; CEA (Technical Standards for Connectivity) Regulations, 2007; CEA (Cyber Security in Power Sector) Guidelines, 2021 and any such regulations issued from time to time, by an appropriate authority, so as to support reliable operation of the grid.	All users, NLDC, RLDCs, SLDCs, CTU and STUs, power exchanges, QCAs, SNAs, shall have in place, a cyber security framework in accordance with Information Technology Act, 2000; CEA (Technical Standards for Connectivity) Regulations, 2007; CEA (Cyber Security in Power Sector) Guidelines, 2021 [Till CEA Cyber Security Regulations 2026 are implemented] and any such regulations issued from time to time, by an appropriate authority, so as to support reliable operation of the grid.	Most of the provisions of CEA Cyber Security Regulations 2026 are implemented from 01.04.2027.

Chapter 7	It may be noted that Nuclear Stations do not fall under DSM. However, it may be noted that they can be covered under DSM with no scheduling rights to beneficiaries- whatever is the entitlement of beneficiary shall be the schedule of beneficiary like being done for RE. The deviations caused by Nuclear affect the grid in real time operation and post facto corrections are to be made in commercial accounting. With the huge target of nuclear generation, it may be imperative that the deviations are settled by nuclear stations only.		