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To

Date: 03.11.2026

The Secretary,
Central Electricity Regulatory Commission (CERC),
World Trade Centre, 6th, 7th and 8th Floor,
Tower-B, Nauroji Nagar, New Delhi – 110029

Subject: Comments/ Suggestions on the Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026, dated 21.09.2026.

Dear Sir,

This is with reference to the notification seeking comments on the Draft CERC (Indian Electricity) (Second Amendment) Regulations, 2026, dated 21.09.2026.

We would like to thank you for providing an opportunity to the stakeholders to submit their comments and suggestions on the CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026, dated 21.09.2026.

We request the Hon'ble Commission to kindly consider our comments/ suggestions favourably while finalising the Indian Electricity Grid Code (Second Amendment) Regulations.

Thanking you.

Yours faithfully,
For Serentica Renewables India Pvt. Ltd.



Kunal L Kaistha
Vice President – Regulatory & Policy

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Comments/ Suggestions on Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026

Sl. No.	Clause No.	Clause in Draft Procedure	Revised/Suggested Clause (if any, in green fount)	Justification/ Rationale
1.	19.(3).(a).	*"19.(3).(a), as per the following:* *(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 the period for injection of infirm power.* *(ii) The request seeking extension of the period for inter-change of power shall be made at least 10 days prior to the requested start date of interchange of power.* *(iii) RLDC may allow multiple extensions with a cumulative time extension for three months, after carefully examining the reasons for such extension.* *(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."*	*19.(3).(a), as per the following:* *(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 the period for injection of infirm power.* *(ii) The request seeking extension of the period for inter-change of power shall be made at least 10 days prior to the requested start date of interchange of power.* *(iii) RLDC may allow multiple extensions with ~~a cumulative time extension for~~ upto three months per extension and till maximum of six months, after carefully examining the reasons for such extension.* *(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* ***(b) for a period beyond ~~three~~ six months, by the Commission on an application(s) made by such generating station or ESS (except Hydro PSP ESS) along with detailed reasons, at least 15 days in advance of the completion of the stipulated period".***	The IEGC 1st amendment dated 23.10.2024 had initially proposed an injection timeline of 45 days + 3 months by the respective RLDC for the commissioning of a REGS (or ESS), post which the REGS has to approach the CERC for further extension. In the explanatory memorandum to the 1st amendment, Grid India (vide letter dated 12.06.2024 at para 4, pg 4) pointed out that a strict limit must be placed on trial runs due to a tendency among RE generators to prolong infirm injection for selling the same in the exchange or bilateral market with no intent to commission. This concern was echoed by the Hon'ble Commission in para 5 of the memorandum, which stated, *"It cannot be the case that a generating station is continuing the injection of infirm power not for testing and pre-commissioning activities but as commercial injection without carrying out a trial run and declaring commercial operation"*. Consequently, while para 6 had provided that the RLDC extension may be given for an initial period of 6 months (beyond the initial 45 days), this period was abruptly reduced from 6 months to 3 months in the final notified 1st amendment. It is humbly stated that infirm power injection by an RE Developer is no longer sellable in either the bilateral market or the power exchanges. It is completely against the commercial interest of any RE generator to prolong testing when such generation fetches zero revenue. Since the incentive to delay commissioning for

				commercial advantage—by exploiting higher bilateral/exchange prices over the PPA contract price—has been entirely removed, the purported rationale of prolonging trial runs for commercial gain no longer exists. Instead, as observed in recent orders passed by this Hon'ble Commission, the actual reasons for RE Developers to seek extensions are purely technical or extraneous. This is evident from the Order dated 23.03.2026 in Petition No. 34/MP/2026 (*TEQ Green Power XI Private Limited v. WRLDC*), Order dated 02.06.2026 in Petition No. 178/MP/2026 (*JSW Renew Energy Ltd. v. SRLDC & Anr*), and Order dated 23.03.2026 in Petition No. 91/MP/2026 (*Ayana Renewable Power Four Private Limited vs. WRLDC*), where delays arose from technical glitches like the failure of imported sub-controllers or force majeure events like theft. In fact, M/s Serentica has similarly approached the Hon'ble Commission for an extension of the commissioning timeline for its wind project in Kallam due to severe theft and vandalism in its WTGs and 33 KV network. However, while acknowledging that the prolonged injection of infirm power is not in the interest of grid security, the rigid 3-month restriction forces genuine cases into avoidable litigation, thereby worsening the huge pendency of cases before the Hon'ble CERC. To balance grid security with practical ground realities, we suggest that the RLDC-level time period of 3 months be increased to 6 months. Under this mechanism, the respective RE Developer would be required to approach the Hon'ble CERC for a further extension only post the expiry of this 6-month window.
2.	**22.(3).(a)**	(3) A new proviso shall be inserted after the second proviso of sub-	*"Provided also that in the case of a project having a capacity of 250 MW or more, the trial run may be performed in*	The suggested amendment in clause 22.3.(a) of the IEGC is for solar PV plants. We would like to inform practical difficulty (outside

		clause (a) of Clause (3) of Regulation 22 of the Principal Regulations as under: *"Provided also that in the case of a project having a capacity of 250 MW or more, the trial run may be performed in instalments, with a minimum capacity of 50 MW without any limit on the number of instalments."*	*instalments, with a first minimum capacity of 50 MW, followed by later trial runs without any limit on the number of instalments."*	Rajasthan) being faced by few solar plants, including that of M/s Serentica, business imperative of optimisation of connectivity utilisation and change in installed capacity due to technical losses. **<u>Difficulty of Contiguous Land</u>** For certain reasons, post covid, the price of real estate – especially land has sky rocketed across the country. In various projects across the country whether renewable or transmission, compensation for land has become a bone of contention between the developer and farmer/land owner significantly delaying project. Landowners/farmer that agree on selling land initially, back out during execution of sale/lease deeds. Exorbitant money is demanded amounting to as high as Rs. 30 lakhs/acre in remote locations of Gadag/Koppal where some of M/s Serentica's projects are being implemented. As a result, getting contiguous land becomes difficult. Further in rural areas, there is tendency to create ruckus in project site and vandalise project equipment once money paid against land is exhausted. Therefore, RE Developer implement project as soon as minimum 40%-50% land is acquired. The strategy is to fence and implement with each incremental addition of land, resulting in progressive but partial completion of project. Out of 250 MW, only say 214 MW is completed in different phases (76+39+26+38+35 = 214). Each phase once completed is commissioned. Now ideally a 250 MW project should get commissioned in maximum five trial runs of 50 MW each, but due to land paucity and project challenges, the incremental commissioning often tends to be less than 50 MW. **<u>Business Imperative</u>** Connectivity is scarce, especially connectivity with reasonable chances of evacuation. Hence, against the same 300

				MW connectivity, installed capacity is increased to improve its utilisation to the most feasible extent. Fundamentally, this results in hybridisation of renewable energy with progressive increase in installed capacity from initially provided in final connectivity approval. The project gets implemented in two phases with first phase having say 220 MW solar capacity and the second another 42 MW, resulting in total 262 MW solar installed capacity against 300 MW connectivity (remaining is wind to fully utilise 300 MW connectivity). 262 MW is higher than 250 MW, but minimum trial run of 50 MW is difficult as the last tranche of solar project is 42 MW (less than 50 MW). A minimum restriction of 50 MW hence will put pay to this flexibility which only improves connectivity utilisation. **<u>Technical Reason</u>** Acquisition of land is the biggest challenge in renewable projects including solar. If contiguous land is not available, non-contiguous land is acquired far away from the initial land thereby increasing the distance of 33 KV network connecting the two land parcels. This increases the $(I)^2R$ losses requiring addition in installed capacity and hence amendment in final connectivity approval. For RE projects the incremental $(I)^2R$ losses result in small (less than 50 MW) increase of installed capacity. As the trial run and commissioning is for installed capacity of project (not connectivity quantum), this capacity that comes during the fag end and being less than 50 MW, would face challenge of commissioning. Hence, the proposed amendment of doing away with minimum 50 MW requirement.
3.	**24.(7)**	The words "(excluding Pumped Storage Plant)" shall be added after the words "Energy Storage Systems" in Clause (7) of Regulation 24 of the	The words "(excluding Pumped Storage Plant)" shall be added after the words "Energy Storage Systems" in Clause (7) of Regulation 24 of the Principal Regulations. *REGS and BESS with capacity of 100*	With increasing renewable energy and storage integration, REGS and BESS can provide rapid frequency support through AGC, improving grid stability and balancing efficiency. Providing incentives for AGC participation would

		Principal Regulations.	*MW and above shall be equipped with the necessary control and communication infrastructure and shall remain ready to provide Automatic Generation Control (AGC) up and Down regulation whenever required by the system operator to maintain grid frequency within the IEGC band.* *If a REGS or BESS participates in AGC up and Down regulation for more than five minutes during a time block, the concerned developer shall be eligible for an incentive for that time block. The incentive mechanism and amount may be determined based on the prevailing IEX market price during the corresponding time block.*	compensate developers for supporting grid operations and encourage greater participation in ancillary and balancing services.
4.	**New Addition**		*When a Battery Energy Storage System (BESS), co-located with a solar or wind generating station, is charged exclusively from the associated RE generation, the charging or discharging operation should not be treated as that of a General Seller. Instead, the BESS should be accorded with the treatment applicable to a Wind-Solar (WS) Seller for the relevant period, subject to appropriate metering and energy accounting to establish the source of charging energy.*	Where a co-located BESS is charged solely from renewable generation, the discharged energy retains its renewable characteristics and should therefore be accorded the same treatment as a WS Seller. This would ensure an appropriate deviation settlement framework, avoid disproportionate penalties, and encourage greater integration of BESS with renewable energy projects while maintaining accurate energy accounting through suitable metering arrangements.
5.	**New Addition**		*RLDC/NLDC/RPC should publish the live characteristic grid frequency graph (24X7) on their respective portals as a reference to all sellers, buyers and stakeholders to understand the contingency of the grid behavior.*	With increasing integration of renewables, storage systems, and demand-side flexibility, public access to frequency data can support the development and provide market participants with better visibility into prevailing grid conditions.
6.	**New Addition**		*The duration of each time block shall be reduced from fifteen (15) minutes to five (5) minutes. Accordingly, scheduling, despatch, metering, energy accounting, and deviation settlement shall be implemented on a five-minute basis, with effect from the date notified by the Commission.*	Reducing the time block from 15 minutes to 5 minutes would better align scheduling, energy accounting, and DSM settlement with actual grid conditions, improving balancing efficiency and frequency management. It would also support higher renewable energy and storage integration by reducing forecasting errors and enabling more responsive grid operations.
7.	**New Addition**		*The Grid Code should include provisions requiring the CTU to coordinate closely with the respective RLDCs while conducting grid studies. The operational*	CTU plays a central role in connectivity approvals, transmission planning, and grid integration of new power system elements. Its inclusion would ensure better

			experience, real-time grid operating conditions and system-specific challenges faced by the RLDCs should be duly considered and incorporated into the studies to ensure to reflect actual grid operating challenges and enhance the reliability and security of the power system.	coordination between planning and system operations.