========== Forwarded message ==========
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Date: Wed, 21 Oct 2026 13:48:15 +0530
Subject: Comments on Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026
========== Forwarded message ==========

Dear Sir,

PFA, comments on cited subject above. Thank you.

Warm Regards,

Manit Brahmbhatt
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Torrent Green Energy Private. Ltd. - Comments on CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026.			
Sr. No	**Draft Clause**	**Proposed Clause**	**Rationale**
1.	**16. Amendment to Regulations 48 and 49 to facilitate shortening of timeline between revisions:** (B) Second phase of implementation (1) The words "7th" shall be substituted with words "5th" in the following: …… (2) The time "22.45" shall be substituted with time "23.15" and time "23.00" shall be substituted with time "23.20" in sub-clause (q)(ii) of Clause (1) of Regulation 49 of the Principal Regulations. (3) The time "23.00" shall be substituted with time "23.20" in sub-clause (q)(iv) of Clause (1) of Regulation 49 of the Principal Regulations.	**16. Amendment to Regulations 48 and 49 to facilitate shortening of timeline between revisions:** (B) Second phase of implementation (1) The words "7th" shall be substituted with words "5th" in the following: …… ~~(2) The time "22.45" shall be substituted with time "23.15" and time "23.00" shall be substituted with time "23.20" in sub-clause (q)(ii) of Clause (1) of Regulation 49 of the Principal Regulations.~~ ~~(3) The time "23.00" shall be substituted with time "23.20" in sub-clause (q)(iv) of Clause (1) of Regulation 49 of the Principal Regulations.~~	The proposed amendments would reduce the RTM bidding window from 15 minutes to only 5 minutes. This period is insufficient for a generating station to receive and validate plant data, assess updated generation, verify the existing schedule, determine surplus or shortfall, finalise bid quantity and submit the bid on the Power Exchange platform. The proposed timeline assumes complete automation and seamless API integration among generating stations, QCAs, Power Exchanges, NLDC, RLDCs, SLDCs and WBES. Such integration is not presently uniform across all market participants. A five-minute window may therefore lead to missed bids, erroneous submissions, reduced RTM participation and higher DSM exposure.
2.	**13. Amendment to Regulation 46 the Principal Regulations: SECURITY CONSTRAINED UNIT COMMITMENT (SCUC):** (1) New sub-clause (a-i) and (a-ii) shall be inserted after sub-clause (a) of Clause (4) of Regulation 46 of the Principal Regulations as under:	**13. Amendment to Regulation 46 the Principal Regulations: SECURITY CONSTRAINED UNIT COMMITMENT (SCUC):** (1) New sub-clause (a-i) and (a-ii) shall be inserted after sub-clause (a) of Clause (4) of Regulation 46 of the Principal Regulations as under:	The proposed minimum schedule of 50% MCR for retaining a generating unit on bar may be revised to 55% MCR. CEA's Standard Operating Procedure for thermal generating units recognises 55% as the Technical Minimum Load benchmark and prescribes detailed technical prerequisites

	"(a-i) The generating station shall, by 1430 Hrs of 'D-1' day, inform the RLDC and beneficiaries of the proposed unit(s) to be taken under USD. (a-ii) The beneficiaries may revise schedules by 1530 Hrs of 'D-1' day to retain such units on-bar by ensuring scheduling of at least 50% MCR for all time blocks." ……. (3) A new sub-clause (b-i) shall be inserted after sub-clause (b) of Clause (4) of Regulation 46 of the Principal Regulations as under: "(b-i) The generating station may declare units under USD by 1600 Hrs of 'D-1' day if the schedule of at least 50% of MCR in all time blocks is not achieved."	"(a-i) The generating station shall, by 1430 Hrs of 'D-1' day, inform the RLDC and beneficiaries of the proposed unit(s) to be taken under USD. (a-ii) The beneficiaries may revise schedules by 1530 Hrs of 'D-1' day to retain such units on-bar by ensuring scheduling of at least ***55 %*** ~~50%~~ MCR for all time blocks." ……. (3) A new sub-clause (b-i) shall be inserted after sub-clause (b) of Clause (4) of Regulation 46 of the Principal Regulations as under: "(b-i) The generating station may declare units under USD by 1600 Hrs of 'D-1' day if the schedule of at least ***55 %*** ~~50%~~ of MCR in all time blocks is not achieved."	and operating procedures for safe operation at that level.
3.	**15. Amendment to Regulation 48 the Principal Regulations:** (1) The words "in terms of mutual consent including on sharing of net savings between the generating station and buyer" shall be substituted with the words "with the express consent of the buyer (which may be in form of a standing consent) and in terms of mutual agreement on sharing of net savings between the generating station and the buyer" in sub-clause (f) of Clause (3) of Regulation 48 of the Principal Regulations.	**15. Amendment to Regulation 48 the Principal Regulations:** (1) The words "in terms of mutual consent including on sharing of net savings between the generating station and buyer" shall be substituted with the words "~~with the express consent of the buyer (which may be in form of a standing consent) and~~ in terms of mutual agreement on sharing of net savings between the generating station and the buyer" in sub-clause (f) of Clause (3) of Regulation 48 of the Principal Regulations.	The requirement of buyer's express consent may be deleted, as alternate supply may be required at short notice following Unit Shutdown, forced outage or partial outage. Obtaining consent and separately negotiating savings sharing may delay scheduling.