========== Forwarded message ==========
From: वाणिज्यिक विभाग | Commercial Department <thdccomml@thdc.co.in>
To: "Sanoj Kumar Jha"<secy@cercind.gov.in>,
"shilpa@cercind.gov.in"<shilpa@cercind.gov.in>
Date: Mon, 26 Oct 2026 16:08:34 +0530
Subject: Fw: Submission of THDCIL's comments/Inputs on the Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026.
========== Forwarded message ==========

महोदय/महोदया,

In reference to the trailing mail, please find attached herewith the **additional** comment/Input of THDC India limited on subject matter.

सादर धन्यवाद,

नीरज कुमार
अपर महाप्रबंधक (वित्त)-वाणिज्यिक
टीएचडीसी इंडिया लिमिटेड,ऋषिकेश।

Additional Comments/Suggestions/Objections of THDCIL on Draft CERC (IEGC) (2nd Amendment) Regulations,2026

Regulation	Proposed Draft IEGC (2nd amendments) Regulations,2026	Comments/ Inputs Proposed by THDCIL	Remarks
Additional Comments/Suggestions			
Regulation 49(3)(b): Procedure for Scheduling and Despatch for Inter-State Transactions	"**(b):** In the event of a bottleneck in evacuation of power due to outage, failure or limitation in the transmission system or any other constraint necessitating reduction in generation, the RLDC shall revise the schedules, subject to the provision that the revised generation and drawal schedules shall become effective from the 7th or 6th time block, depending upon the time block in which the schedule has been revised as the first time block."	"**(b):** In the event of a bottleneck in evacuation of power due to outage, failure or limitation in the transmission system or any other constraint necessitating reduction in generation, the RLDC shall revise the schedules, subject to the provision that the revised generation and drawal schedules shall become effective from the 7th or 6th time block, depending upon the time block in which the schedule has been revised as the first time block." "Provided further that, in the case of Pumped Storage Plants (PSPs), the RLDC shall revise the generation and drawal schedules, as applicable, with immediate effect."	Tariff recovery for PSPs under the prevailing CERC Tariff Regulations is linked to Annual Fixed Charges and cycle efficiency, with no provision for recovery of variable/energy charges linked to scheduled generation, unlike conventional generating stations. In the event of sudden transmission outages, grid disturbances, or other events beyond the control of PSP's, delayed schedule revision, effective only from the 7th or 6th time block, may result in a mismatch between actual operation and the prevailing schedule, thereby penalising PSP through Deviation Settlement Mechanism (DSM) implications.