========== 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, 19 Oct 2026 13:14:58 +0530
Subject: Submission of THDCIL's comments/Inputs on the Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026.
========== Forwarded message ==========

महोदय,

In reference to the Public Notice No. No. L-1/265/2022/CERC dated 21.09.2026 issued by the Hon'ble CERC on the Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026, please find attached herewith the comments/Inputs of THDC India limited.

सादर धन्यवाद,

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

========== 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।

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
22. Trial Run of Generating Unit	The following proviso shall be added in sub-**clause (f) of Clause (3) of Regulation 22** of the Principal Regulations: "Provided that (i) short interruption or load reduction shall be permissible with the corresponding increase in duration of the test; (ii) interruption or partial loading may be allowed with the condition that the average load during the duration of the trial run shall not be less than MCR, excluding the period of interruption but including the corresponding extended period; (iii) cumulative interruption of more than four (4) hours (including both pumping and turbo-generator mode) shall call for a repeat of the trial run;	The following proviso shall be added in sub-**clause (f) of Clause (3) of Regulation 22** of the Principal Regulations: "Provided that (i) short interruption or load reduction shall be permissible with the corresponding increase in duration of the test; (ii) interruption or partial loading may be allowed with the condition that the average load during the duration of the trial run shall not be less than MCR, excluding the period of interruption but including the corresponding extended period; (iii) cumulative interruption of more than four (4) hours **(excluding the transition time i.e. switchover from pumping to generation)** (including both pumping and turbo-generator mode) shall call for a repeat of the trial run;	In PSPs, switching between pumping to generation modes involves planned operational activities, and the associated transition time which is an inherent operational requirement of the Pump Storage Plants. Exclusion of this time would prevent repetition of the trial run while maintaining the prescribed performance requirements.
30A. Congestion Charge	**"30A. CONGESTION CHARGE:** …… **(6) Payment of Congestion Charge.** The Regional Entity liable to pay congestion charge, shall deposit the amount in Pool	**"30A. CONGESTION CHARGE:** …….. **(6) Payment of Congestion Charge.** The Regional Entity liable to pay congestion charge, shall deposit the amount in Pool Account	The payment mechanism should ensure timely settlement by both the defaulting and paying

Regulation	Proposed Draft IEGC (2nd amendments) Regulations,2026	Comments/ Inputs Proposed by THDCIL	Remarks
	Account within 10 days of issue of statement by the Regional Power Committee Secretariat: Provided that when payment of congestion charge is delayed beyond the due date, the regional entity responsible for delay in depositing congestion charge amount shall be liable to pay interest at the rate of 0.04% per day. **(7) Release of Congestion Charge Amount.** The RLDCs shall, within 2 (two) working days of receipt of congestion charge, release the amount payable to the Regional Entity entitled to receive congestion charge, along with interest, if any, on account of delay in payment of congestion charge. ……	within 10 days of issue of statement by the Regional Power Committee Secretariat: Provided that when payment of congestion charge is delayed beyond the due date, the regional entity responsible for delay in depositing congestion charge amount shall be liable to pay **Simple** interest at the rate of 0.04% **for each day of delay.** **(7) Release of Congestion Charge Amount.** The RLDCs shall, within 2 (two) working days of receipt of congestion charge, release the amount payable to the Regional Entity entitled to receive congestion charge, along with **Simple interest at the rate of 0.04% for each day of delay,** if any, on account of delay in payment of congestion charge. ……	entities. Accordingly, delayed payment should attract simple interest at 0.04% per day for each day of delay in each case which is also in line with accounting and payment for Reactive energy as mention in IEGC 2023. The days of delay, if any, shall be calculated after 12 days of issue of statement by the Regional Power Committee Secretariat
Annexure-8 (Clause no. 4.6)	Once such free power share which is scheduled to SG ~~**is sold by the SG, the corresponding injection schedule**~~ will be reflected in the scheduled generation for the CHGS (s).	Once such free power share which is scheduled to SG will be reflected in the scheduled generation for the CHGS (s).	Once the free power scheduled to SG, it shall be reflected into the schedule of SG irrespective of power sale option utilized by the SG.

Regulation	Proposed Draft IEGC (2nd amendments) Regulations,2026	Comments/ Inputs Proposed by THDCIL	Remarks
Appendix-I of Annexure-8	A typical example of the scheduling of the free power quantum and computation of the deviation for a particular time block: • Total scheduled Generation for D day at Central Hydro Generating Station bus bar) (L= ~~**J+K**~~) • Deviation of Central Hydro Generating Station O= ~~**L- (I+M)**~~	A typical example of the scheduling of the free power quantum and computation of the deviation for a particular time block: • Total scheduled Generation for D day at Central Hydro Generating Station bus bar) (L=**I**+K) • Deviation of Central Hydro Generating Station O= **(M-L)**	Formulas (Column Name) may be revised as per the nomenclature.
Additional Comments/Suggestions			
Regulation 25 of IEGC 2023	In case any objection is raised by a beneficiary in writing to the concerned RLDC with a copy to all concerned regarding the trial run within ~~**two (2) days**~~ of completion of such trial run, the concerned RLDC shall, within ~~**five (5) days**~~ of receipt of such objection, in coordination with the concerned entity and the beneficiaries, decide if the trial run was successful or if there is a need for a repeat trial run	In case any objection is raised by a beneficiary in writing to the concerned RLDC with a copy to all concerned regarding the trial run within **one (1) day** of completion of such trial run, the concerned RLDC shall, within **two (2) days** of receipt of such objection, in coordination with the concerned entity and the beneficiaries, decide if the trial run was successful or if there is a need for a repeat trial run	The reduction in the notice period for the trial run in current draft (2nd amendment) necessitates a corresponding reduction in the timelines for raising objections by beneficiaries and their resolution by the concerned RLDC. Therefore, the proposed timelines may be aligned with the revised trial-run notice period while ensuring timely resolution of objections.

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.