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(A Government of West Bengal Enterprise)
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Regulation Cell

Memo No: REG/CERC/ 164 **Dated:** 14.10.2026

To
The Secretary, CERC,
7th Floor, Tower B, World Trade Centre,
Nauroji Nagar,
New Delhi-110029

Sub: Comments/suggestion of WBSEDCL on the Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026.

Ref: Public Notice under Memo No. L-1/265/2022/CERC dated 21.09.2026 of CERC.

Sir,

With reference to above comments/suggestion of WBSEDCL on the Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026 is attached for your consideration, please.

Enclo: As Stated

Yours faithfully,

14/10/26.
(Shyamal Kanti Das)
Chief Engineer (Regulation)

Comments of WBSEDCL on Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026

Ref No:. L-1/265/2022/CERC Dated: 21.09.2026

1. Concern to the Introduction of Congestion Charges

WBSEDCL strongly opposes the introduction of a separate congestion-charge mechanism under proposed Regulation 30A. Utilities and Distribution Licensees already face substantial financial liabilities under the Deviation Settlement Mechanism (DSM) and applicable Transmission Deviation Account (TDA) provisions. Since proposed Regulation 30A(1)(c) expressly provides for congestion charges in addition to applicable DSM charges, the same underlying deviation may attract cumulative financial penalties, imposing an undue burden on DISCOMs and ultimately consumers.

Congestion management should primarily rely on effective ancillary-service deployment, adequate reserve availability and demand management, rather than additional penalties without adequately distinguishing between deviations that aggravate congestion and those that help relieve it.

2. Concern on the Congestion Event Cited in the Explanatory Memorandum

The Explanatory Memorandum cites the congestion event of 19 August 2025, when the Southern Region–Western Region (SR–WR) corridor experienced congestion from 12:46 hrs to 15:45 hrs and the Western Region–Northern Region (WR–NR) corridor from 12:46 hrs to 16:15 hrs. The Western Region acted as a wheeling region, simultaneously importing power from the Southern Region and exporting it towards the Northern Region.

(i) Deployment of ancillary services and demand management

The congestion could potentially have been mitigated through timely deployment of upward ancillary services in NRLDC to reduce dependence on imports through the Western Region. If sufficient upward reserves were unavailable, an effective Automatic Demand Management Scheme (ADMS) in the importing or sink region could have reduced drawal. Similarly, downward ancillary services in SRLDC could have reduced exports and potentially relieved congestion on the SR–WR corridor.

The event should therefore be assessed in terms of reserve availability, deployment, response time and the effectiveness of demand-management measures, rather than solely through deviations by regional entities.

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(ii) Potential conflict between congestion charges and frequency support followed by unnecessary power interruption through ADMS.

Consider a hypothetical situation in which system frequency falls to around 49.4 Hz while power is being transferred from SR to NR through WR. A utility in SR or WR injecting above its schedule, while remaining within the applicable DSM benchmark, may nevertheless back down generation to avoid congestion charges.

If frequency subsequently recovers towards 49.8 Hz and frequency-sensitive demand returns, ADMS may operate if its configured conditions are met. Consumers in SR and WR could then face load shedding despite generation having already been backed down. This illustrates how congestion-related financial incentives, if not coordinated with frequency response and system-security requirements, may conflict with operational needs.

The concern is particularly significant for DISCOMs, whose DSM exposure is market-driven, whereas generator-side deviation settlement follows the applicable methodology, including ECR-linked rates where prescribed. This may result in asymmetric financial exposure for DISCOMs and increase the burden passed on to consumers.

WBSEDCL therefore emphasises the need for a robust ADMS framework, rapid deployment of ancillary reserves in the sink region, adequate reserve availability, and transparent disclosure of reserve availability and actual utilisation in the cited congestion event.

(iii) Adequate advance notice of congestion charges

Proposed Regulation 30A(3) provides for at least two clear time blocks' notice before congestion charges become applicable. WBSEDCL requests that this be increased to **at least four clear time blocks**, wherever operationally practicable, with suitable provisions for unforeseen emergencies. Thermal generating stations may be unable to ramp up or down adequately within two time blocks owing to ramp-rate constraints and minimum stable generation requirements.

The notice should identify the affected corridor, relevant time blocks, congestion conditions, commencement and withdrawal of charges, and the basis of calculation, enabling utilities to take corrective action wherever feasible.

3. Appreciation of Revised RTM Gate-Closure Timelines and Phased Implementation of the Five-Minute Bidding Window

WBSEDCL appreciates the Commission's initiative to bring Real-Time Market (RTM) gate closure and associated scheduling processes closer to real time. This will help DISCOMs refine procurement decisions closer to delivery and adhere more closely to

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schedules, particularly with increasing renewable-energy integration and associated demand and generation uncertainty.

However, the proposed **five-minute RTM bidding window under Phase II (w.e.f. 01.04.2027)** may be challenging unless the required automation and system integration are fully operational. The sequential processes involving Power Exchanges, NLDC, RLDCs, SLDCs and the WBES portal require adequate time for bid submission, schedule updates, market clearance and communication of final schedules.

WBSEDCL therefore requests **a phased transition to the five-minute bidding window, with a 10-minute bidding window adopted as an interim measure**. The five-minute window may be implemented once standardised API-based integration, end-to-end automation and system readiness across all stakeholders have been adequately established and tested.

Comprehensive, phase-wise implementation guidelines should clearly specify timelines for RTM bidding and clearance, schedule finalisation by NLDC, integration with SCED, SCUC and ancillary services, and publication of final schedules by RLDCs. Adequate time should also be provided for system modification, automation, testing and operational validation by beneficiaries.

4. Transparency in Ancillary Services, SCUC, SCED and Related Settlements

WBSEDCL requests mandatory, time-stamped and time-block-wise publication of technical and financial information concerning ancillary services, Security-Constrained Unit Commitment (SCUC), Security-Constrained Economic Dispatch (SCED), congestion management and other system-operator interventions affecting beneficiaries.

Published data should include the rationale for interventions, schedules and revisions, generation commitment or decommitment, incremental and decremental dispatch, ancillary-service quantities and rates, associated costs, corridor conditions, congestion-charge calculations and beneficiary-wise allocation of liabilities. This information should be available through a common, accessible and downloadable platform with an adequate audit trail.

Final settlement statements alone may not provide sufficient visibility into the operational decisions underlying financial liabilities. Transparent disclosure would enable DISCOMs to reconcile schedules, verify charges, improve procurement and scheduling decisions, and help prevent unjustified costs from being passed on to consumers.

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