भारत सरकार
Government of India
केन्द्रीय विद्युत प्राधिकरण
Central Electricity Authority
पश्चिम क्षेत्रीय विद्युत समिति
Western Regional Power Committee
एफ-3, एमआयडीसी क्षेत्र, अंधेरी पुर्व मुंबई
F-3, MIDC Area, Andheri (East), Mumbai – 400093

No. WRPC/Comml-1/Congestion/2026/ 03163 Dated: .10.2026

29 OCT 2026

To,

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

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

Sir,

The Draft CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026, proposes to insert a new Regulation 30A, titled "Congestion Charge", after Regulation 30 of the principal regulations. The Regulation 30A(1)(b) provides for applicability of Congestion charge to wheeling region in case of simultaneous congestion in import and export region.

2. The Regulation 30A(1)(b) provides that "Where a control area/region simultaneously acts as an importing control area (downstream) with respect to one congested corridor and an exporting control area (upstream) with respect to another congested corridor (i.e. the control area/region is wheeling power and both its incoming and outgoing corridors are congested at the same time), any deviation from schedule by regional entities in that control area/region shall attract congestion charge irrespective of the direction or nature of the deviation and irrespective of whether the deviation apparently relieves or aggravates the congestion on a particular corridor".

3. In this regard, the following is submitted for consideration:

(i) An instance of simultaneous congestion occurred on the SR–WR corridor (SR exporting to WR) from 12:46 hrs to 15:45 hrs and the WR–NR corridor (WR exporting to NR) from 12:46 hrs to 16:15 hrs. During the overlapping period, WR was an intervening/wheeling region, receiving power from SR and supplying NR. NLDC in its Notice No. NLDC/2025/08/19 dated 19.08.2025 indicated applicability of congestion charge to all WR entities deviating from schedules.

(ii) The matter regarding applicability of congestion charge to all WR entities deviating from schedules when WR is acting as wheeling region was subsequently deliberated in the CCM and TCC/WRPC meetings.

(iii) From the deliberations it transpired that the approach for application of congestion charges to all WR entities deviating from schedules, as mentioned in the notice of NLDC, may not be in consonance with the spirit of the Hon'ble CERC (Measures to relieve congestion in real-time operation) Regulations, 2009. The fundamental objective of congestion charge is to discourage entities aggravating congestion and compensate entities relieving it. Therefore, deviation from schedule, by itself, should not be the sole criterion for levying congestion charge. For simultaneous SR–WR and WR–NR congestion, a deviation by a WR entity could aggravate congestion on one corridor while relieving congestion on the other. It was also observed that imposing a blanket congestion penalty on all deviating entities was not in the spirit of the regulations, since maintaining absolutely zero deviation is impracticable and congestion charge should not be mechanically linked with DSM charges.

(iv) Accordingly, WRPC communicated its views to the Hon'ble CERC vide letter No. WRPC/Comml-1/Congestion/2025/3477-3478 dated 23.12.2025. A copy of the letter is enclosed for reference.

(v) Furthermore, it is respectfully submitted that maintaining zero deviation is practically unachievable due to inherent and unavoidable technical tolerances in instrumentation transformers (CTs/PTs) and metering equipments. However, maintaining deviation in particular direction is certainly possible but to keep it down to zero is certainly impossible. Therefore, it would not be appropriate to punish the entities falling in the wheeling region for any deviation irrespective of direction of deviation.

4. It is proposed that the Regulation 30A(1)(b) may be amended as ***"Where a control area/region simultaneously acts as an importing control area (downstream) with respect to one congested corridor and an exporting control area (upstream) with respect to another congested corridor (i.e. the control area/region is wheeling power and both its incoming and outgoing corridors are congested at the same time), any deviation from schedule by regional entities in that control area/region within the volume limit where Reference Rate/Contract Rate/Normal Rate are applicable shall not attract congestion charge and any deviation over & above the volume limit where Reference Rate/Contract Rate/Normal Rate are applicable shall attract congestion charge irrespective of the direction and irrespective of whether the deviation apparently relieves or aggravates the congestion on a particular corridor".***

5. In view of the above, it is requested that the proposed Regulation 30A(1)(b) may kindly be reviewed based on the above submissions. This would ensure that congestion charges serve their intended purpose of relieving actual network congestion without penalising entities in a wheeling region.

Encl.: As above

Yours faithfully,

P.D.Lone
Superintending Engineer (Comml.)

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Government of India
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Letter No.: WRPC/Comml-1/Congestion/2025/ 3477-3478

Date: .12.2025

23 DEC 2025

To,

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

Sub: Methodology for application of Congestion Charges under Simultaneous Southern Region (SR) - Western Region (WR) and Western Region (WR) - Northern Region (NR) Congestion- Reg.

Sir,

NLDC vide Notice No. NLDC/2025/08/19 dated 19.08.2025 (Copy enclosed as **Annexure-1**) has intimated that congestion occurred during the period from 12:46 hrs to 15:45 hrs (Block 64) from the Southern Region to the Western Region (import from the Southern Region), & during the period from 12:46 hrs to 16:15 hrs (Block 66) from the Western Region to the Northern Region (export to the Northern Region) on 19.08.2025 and the congestion charges would apply to all the WR entities deviating from schedules.

2. The Regulation (4) of Hon'ble CERC (Measures to relieve congestion in real-time operation) Regulations, 2009 is reproduced below:

1) *To relieve congestion in the real time, a congestion charge shall be applied as a commercial measure. The congestion charge will be payable by a Regional entity or entities causing congestion in the inter-regional link or intra-regional link and receivable by a Regional entity or entities relieving congestion.*

2) *Congestion charge may be imposed on any Regional entity or entities in any Region or Regions for causing congestion and paid to any Regional entity or entities in any Region or Regions for relieving congestion as per the detailed procedure under these regulations formulated by NLDC and approved by the Commission.*

3. Further, as per the Detailed Procedure for Relieving Congestion in Real-Time Operation dated 22nd April 2013 issued under Regulation 4(2) of the CERC (Measures to Relieve Congestion in Real-Time Operation) Regulations, 2009, the relevant provision of application of congestion charges as given below:

6.2. Congestion charge would be levied for
a) over drawal or under-injection in the importing control area and
b) under drawal or over-injection in the exporting control area

4. As can be seen from the notice of NLDC dated 19.08.2025, a simultaneous congestion between SR-WR (WR as importing region) and WR-NR (WR as exporting region) occurred on 19.08.2025 during the period 12:46 hrs to 15:45 hrs, and there was heavy export from SR & heavy import by NR through WR (wheeling region). The methodology for the application of congestion charges under such a scenario has not been dealt with in the regulations & procedures given under para 2 & para 3, respectively.

5. The matter was discussed in the 95th Commercial sub-Committee Meeting of WRPC held on 21.11.2025 in which it transpired that the approach for application of congestion charges to all WR entities deviating from schedules, as mentioned in the notice of NLDC, may not be in consonance with the spirit of the Regulations. It was decided that the congestion statements shall be issued by treating the congestion on the SR–WR corridor and the WR–

NR corridor as two separate congestion cases, until a specific order is issued by the Hon'ble CERC prescribing the methodology for computation of congestion charges of wheeling region (WR in this case) under such scenario.

This is submitted for kind information and further directions.

Encl.: As above

Yours faithfully,

22/12/25

Manoj Reddy
Assistant Director (Comml.)

Copy to: ED, NLDC, Grid-India, New Delhi

Annexure-I

Format V

National Load Despatch Centre

007

Notice Number: NLDC/2025/ 08 / 19

Date: 19 / 08 /2025

Time of Issue: 15 : 46

To, SRLDC, WRLDC, NRLDC.

NOTICE FOR WITHDRAWAL OF CONGESTION CHARGE Removal in SR-WR and SR Export only. Congestion charge would be continued in WR-NR and NR-Import.

Congestion charge on Unscheduled Interchange (UI) energy that was applicable w.e.f 13 : 30 hrs of 19 / 08 / 2025 vide Notice Number NLDC/2025/08/19 issued at 12 : 46 hrs of 19 / 08 / 2025 would be lifted w.e.f time block no. 64 (15 : 45 hrs of 19 / 08 / 2025).

Shift Charge Manager

Issued in accordance with the Central Electricity Regulatory Commission (Measures to relieve congestion in real time operation) Regulations, 2009

National Load Despatch Centre

008

Notice Number: NLDC/2025/08/19

Date: 19/08/2025
Time of Issue: 16:07

To, WRLDC, NRLDC

NOTICE FOR WITHDRAWAL OF CONGESTION CHARGE

Congestion charge on Unscheduled Interchange (UI) energy that was applicable w.e.f 13 : 30 hrs of 19 / 08 / 2025 vide Notice Number NLDC/2025/08/19 issued at 12 : 46 hrs of 19 / 08 / 2025 would be lifted w.e.f time block no. 66 (16 : 15 hrs of 19 / 08 / 2025).

Shift Charge Manager

Issued in accordance with the Central Electricity Regulatory Commission (Measures to relieve congestion in real time operation) Regulations, 2009

Format-IV

009

National Load Despatch Centre

Notice Number: NLDC/2025/ 08 / 19

Date: 19 / 08 /2025
Time of Issue: 12 : 46

To,
SRLDC, WRLDC, NRLDC

NOTICE FOR APPLICATION OF CONGESTION CHARGE

Congestion charge for Unscheduled Interchange (UI) energy as per CERC (Measures for relieving congestion) Regulations, 2009 dated 22nd December 2009 would be applicable w.e.f time block no. 55th (13 : 30 hrs of 19 / 08 / 2025).

Corridor/Control Area	TTC (MW)	Actual Flow (MW)
SR-WR	8500	9783
SR-Export	7700	10015
WR-NR	15520	15767
NR-Import	15800	16121

Congestion charge would be applicable on the following regional entities, which are downstream of the congested corridor:

1. All the entities of NR which are Overdrawing/Underinjecting.
2. All the entities of WR which are deviating from Schedule.

Congestion charge would be applicable on the following regional entities, which are upstream of the congested corridor:

1. All the entities of SR which are Underdrawing/Overinjecting.
2. All the entities of WR which are deviating from schedule.

Shift Charge Manager

S. Machal.
19-08-2025

Issued in accordance with the Central Electricity Regulatory Commission (Measures to relieve congestion in real time operation) Regulations, 2009