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Date: Wed, 21 Oct 2026 23:12:29 +0530
Subject: Suggestions on proposed amendment under Regulation 22(3)(e) regarding minimum 50 MW capacity requirement for trial run of Energy Storage Systems (ESS) excluding Pumped Storage Plants
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Respected Sir/Madam,

We would like to submit our observations and suggestions on the Draft **Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026**, wherein a provision has been proposed under Regulation 22(3)(e) requiring a standalone ESS to undertake trial run for a minimum capacity aggregating to 50 MW.

We respectfully submit that while the intent of ensuring adequate demonstration of system performance is appreciated, the proposed minimum capacity of 50 MW may create practical challenges for Battery Energy Storage System (BESS) projects being commissioned across the country.

The following points are submitted for kind consideration:

1. **Commercial commissioning strategy of BESS projects**
   Presently, most utility-scale BESS projects are designed and commissioned in modular blocks. The industry practice adopted by major OEMs, system integrators, and developers is to commission and validate BESS in smaller increments, typically around **15-20 MW blocks**, based on inverter, transformer, and battery container configurations. Requiring a minimum 50 MW aggregation before trial run may delay progressive commissioning and energization activities.
2. **Need for accelerated deployment of energy storage**
   India is witnessing rapid growth in renewable energy capacity, resulting in increasing requirements for balancing resources and energy shifting during non-solar hours. Battery Energy Storage Systems are expected to play a critical role in meeting peak demand, supporting renewable integration, and enhancing grid flexibility. Allowing commissioning and trial run in smaller blocks would facilitate earlier availability of storage capacity to the grid and support national energy transition objectives.
3. **Avoidance of avoidable commissioning delays**
   BESS projects often face staggered delivery schedules of batteries, PCS units, transformers, and associated balance-of-plant equipment. If trial run is restricted until 50 MW capacity is available, commissioned assets may remain idle despite being technically ready for operation, resulting in inefficient utilization of infrastructure and delays in achieving commercial operation.
4. **Minimal grid impact of smaller trial run blocks**
   Unlike conventional generating stations, BESS projects are highly controllable resources with fast response capabilities and sophisticated protection systems. Trial runs conducted at 15-20 MW or similar capacities can adequately demonstrate performance while maintaining operational safety and grid reliability.

5. **Consistency with modular architecture of BESS**
   BESS projects are inherently modular in nature. A requirement permitting trial run at individual operational blocks would align the regulatory framework with actual project design and deployment practices.

In view of the above, it is respectfully proposed that Regulation 22(3)(e) may be modified as follows:

"Provided that the trial run of a standalone ESS shall be permitted for a minimum capacity aggregating to 15-20 MW or the commissioned block capacity, whichever is lower."

Alternatively:

"Provided that trial run of standalone ESS may be carried out in modular blocks of not less than 15-20 MW, subject to meeting all technical and operational requirements specified by the RLDC."

This relaxation would enable faster commissioning of BESS projects, facilitate earlier availability of storage resources for grid support during peak and non-solar hours, encourage timely project execution, and support India's renewable energy integration targets without adversely impacting grid security.

We request the Hon'ble Commission to kindly consider the above suggestion while finalizing the amendment regulations.

Thanking You.

Thanks & Regards
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