Comments on Draft IEGC (Second Amendment),2026

By

Jhabua Power Limited
(JV of NTPC Ltd.)

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Executive summary

Seven proposed changes to improve supply continuity, market access and operational feasibility

1. Supply During USD of the Unit in Single Unit Configuration

2. Replace Buyer Consent with Prior Intimation in case of Replacement of RE Power and also Methodology need to be formulated for sharing of net saving gains

3. Protect Station Technical Minimum Load across all revisions during D-1 day

4. Applicability of PPA Compensation Clauses in case of RLDC Curtailment of defaulting entities

5. Retain the existing time bidding window of 15 minute of RTM Market

6. Allowing alternate supply arrangement in case of Planned Outage/ Partial Outage also

7. Procurement of Alternate Power through GDAM also and implementation of G-RTM Segment for buy/sell of Green Energy on Real Time basis.

1. Unit Shut Down: preserve supply obligations

Proposed Clause: **Regulation 47(2)(c)**

(c) In the special case of a generating station where the only running machine is going under USD, the beneficiaries who have requisitioned power will not get any power from that generating station."

Proposed Modification

(*c) In the special case of a generating station where the only running machine is going under USD,* ***the generating station may be allowed to serve the beneficiaries by purchasing power from alternate source mechanism including Power market for contracts under Section-63 (Medium Term/Short Term).***

JPL's rationale

Maintain continuity of supply for beneficiaries who requisitioned power before USD.

Preserve declaration of availability and recovery of fixed cost, subject to the applicable framework.

Treat market procurement as a way to discharge the existing supply obligation—not extinguish it.

Also, Shutdown may be caused due to lesser schedule provided by beneficiaries not obeying the Technical minimum obligations and considering the safety of the unit.

Core message: shutdown of a unit should not, by itself, end the obligation to honour prior requisitions.

2. Renewable replacement: make the process workable

Regulation 48(3)(f) — alternate-source supply and savings

Requested modification

In case of a generating station other than whose tariff is determined by the Commission under Section 62 of the Act, supply of power by such generating station to its buyer from an alternate source in terms of sub-clauses (a) to (d) of this clause shall be in accordance with the contract with the buyer and in the absence of a specific provision in the contract, ***with prior intimation to the buyer and in line with the guidelines of Ministry of Power, GoI on sharing of net savings between the generating station and the buyer.***

Additional Comment

Further a suitable methodology for calculation of sharing of net savings between the generating station and the buyer may please be incorporated in Regulation by the Hon'ble Commission.

Why JPL proposes this

A requirement for mutual agreement on savings may delay or prevent economically beneficial renewable substitution.

The comments state that IEGC and Tariff Regulations do not currently prescribe a methodology for Section 62 arrangements.

A defined framework can reduce ambiguity and support renewable blending to the maximum extent.

Decision requested: prior intimation + defined net savings methodology.

3. Retain the 15-minute RTM bidding window

Clauses 48 and 49 — Phase-II implementation

Current / JPL recommendation

15-minute bidding window

More time to assess revised beneficiary schedules and place beneficiary-wise URS bids.

Proposed Phase-II timeline

5-minute bidding window

JPL considers this insufficient where portal updates, manual bidding and multiple beneficiaries are involved.

Illustrative sequence for the first 00:00–00:30 delivery period

Current	22:45 gate closure	22:48 WBES update	15-minute auction window
Proposed	23:15 gate closure	23:18 WBES update	5-minute auction window

Risk: bids placed before WBES updates may exceed scheduled generation and trigger DSM exposure.

Annexure: JPL's RTM illustration

Scenario described in the comments

WBES Revision No. 94 showed scheduled generation of 308.72 MW.

A beneficiary's revised schedule for 13:00–13:30 was reflected only at 11:48 under Revision No. 95.

An RTM bid of 50 MW was placed for the 13:00–13:15 block.

Operational consequence stated by JPL

Final schedule in Block 53 became 438.72 MW.

JPL states that a 5-minute window, with only 2 minutes to revise or withdraw the bid, would be insufficient.

The resulting ramp-up requirement of 130 MW from Block 52 to 53 was stated to be infeasible.

The example is presented as support for retaining the existing 15-minute RTM bidding window.

4. Minimum turndown: close a D-1 scheduling gap

Regulation 49(4)(b)(ii) — Proposed Addition

Proposed Addition

"*Provided that downward revision of schedules by the buyers for 'D' day, even during 'D-1' day, in the generating station is permissible* ***only for beneficiaries which have scheduled above their respective share of minimum turndown level in the generating station, such that the minimum turndown level of the station is maintained."***

Requested safeguard

Apply the MTL condition to downward revisions during D-1, not only after 14:30.

Permit downward revision only where the beneficiary is scheduled above its share of MTL.

Ensure the station's minimum turndown level is maintained.

To prevent avoidable loss of market-offering opportunities and technically unsustainable schedules.

5. Defaulting entities: clarify compensation

Regulation 45(16)(iv) — Proposed addition

Proposed addition after Clause 16 (a)(iii)

(iv) In case of curtailment of drawl schedule of defaulting entities by RLDC, the defaulting entities shall be additionally obligated to pay to the applicable compensation as per the PPAs in case of deviation by more than permissible limits in scheduled offtake quantum..

Rationale stated by JPL

The comments refer to a 15% permissible deviation under short-term tenders.

They state that compensation of 20% of tariff applies beyond the permitted deviation.

They also note that TAM contracts may impose a 100% penalty for default in supply obligations.

Clarify the treatment of deviations arising when RLDC curtails a defaulting entity's schedule which further leads to the deviation in Schedule Off-Take

6. Permit alternate-source supply during planned outages

Regulation 48(1)(ii) — Proposed Addition

Proposed Addition

*A generating station may supply power from alternate source in case of (i) USD in terms of clause (1) of Regulation 47 of these regulations or (ii) forced outage / **planned outage/ partial outage of unit(s) or** (iii) a generating station other than REGS replacing its scheduled generation by power supplied from REGS/**GDAM in all types of Contracts i.e. Long Term/Medium Term/Short term with prior intimation to beneficiaries** irrespective of whether such identified sources are located within or outside the premises of the generating station or at a different location.*

Rationale in the comments

Planned maintenance, annual overhauling and low fuel stock can affect supply capability.

Section 63 PPAs may require 85% availability and can impose damages for shortfall.

The cited model medium-term PPA permits substitute supply in specified circumstances.

JPL's further request: prior intimation should be sufficient; buyer consent should not be mandatory for alternate-source supply.

7. Expand renewable procurement options

Regulation 48(3)(a) — GDAM access and Implementation of G-RTM on Real Time basis –Proposed Addition

Proposed Change

The generating station shall enter into contract with REGS for supply of power from any alternate sources ***including GDAM. Further, appropriate mechanism to be put into place for smooth execution of such transactions.***

Also, like Real Time Market for Conventional Energy, Green RTM Segment is also need of the hour and Hon'ble Commission is requested to issue the necessary directions to Power Exchanges for implementation of **Real Time Market of Green Energy**

Expected benefits / enabling measures

Broader market access can improve competitive price discovery and net gains.

G-RTM can help replace curtailed renewable quantum in real time and use surplus renewable energy.

Issue clear execution guidelines; automate processes and integrate REMC scheduling software with RLDC WBES interfaces within a defined timeframe.

Implementation focus: market access + Implementation of G-RTM+ system integration.

Summary of the Comments before Hon'ble Commission

1. Allow alternate-source procurement during USD to honour existing requisitions.
2. Replace buyer consent / mutual agreement barriers with prior intimation where proposed, and prescribe net-savings methodology.
3. Apply the minimum-turndown safeguard to downward schedule revisions throughout D-1.
4. Clarify compensation for deviations beyond permissible limits following RLDC curtailment of defaulting entities.
5. Retain the 15-minute RTM bidding window and ensure scheduling systems are ready before any change.
6. Extend alternate-source supply to planned / partial outages and relevant contract tenures.
7. Inclusion of GDAM and implementation of Green RTM with clear procedures and automated system integration.

Thank You