

NLC INDIA LTD

Presentation on

CERC (Indian Electricity Grid Code) (Second Amendment) Regulations, 2026 - DRAFT











CERC PUBLIC HEARING ON 4TH NOVEMBER 2026

Comment – 1 (Provision for USD)

(3) A new sub-clause (b-i) shall be inserted after sub-clause (b) of Clause (4) of Regulation 46 of the Principal Regulations as under:

"(b-i) The generating station may declare units under USD by 1600 Hrs of 'D-1' day if the schedule of at least 50% of MCR in all time blocks is not achieved."

Station-Specific MTL Threshold: 50% MCR threshold for USD may be linked to the applicable MTL of each station. Uniform threshold for both coal & lignite imposes a significant challenge for lignite fired stations.

MTL Protection through willing Beneficiaries: Wherever the aggregate requisition based on original entitlement falls below the prescribed USD threshold, Units may be permitted to remain on-bar with MTL schedule protection, with requisitions from willing beneficiary being uplifted to the applicable MTL level,.

Peak-Hour Priority: In this case, Peak-hour power allocation needs to be prioritized to beneficiaries supporting MTL schedules during off-peak periods. **This will provide higher grid reserve during peak hours.**

Fixed Cost Liability: FC liability may be retained with the original beneficiary alone when power is availed by any other beneficiary beyond any their entitlement, **enabling merit-order procurement based on ECR alone.**

Post-USD Revival Protection: MTL schedule protection may be provided for a minimum of **three days** after revival from USD to avoid frequent shutdowns and uneconomic operation.

Operational Benefits: This will reduce start-up/shutdown cycles, thermal stress & secondary fuel oil consumption, while improving plant reliability.

Comment – 2 (Multiple USD Declarations)

Amendment to Regulation 46 & 47 the Principal Regulations

*46(4a-i) The generating station shall, by **1430 Hrs** of 'D-1' day, inform the RLDC and beneficiaries of the proposed unit(s) to be taken under USD*
*46(4b-i) The generating station may declare units under USD by **1600 Hrs** of 'D-1' day if the schedule of at least 50% of MCR in all time blocks is not achieved.*
*47(2a) The generating station shall, by **1800 Hrs** of 'D-1' day, inform the RLDC and beneficiaries of the unit(s) to be taken under USD.*

Minimize USD declarations: The existing 18:00 and 20:00 hrs intimation framework may be retained or timelines may be rationalized to reduce multiple daily declarations and operational burden. **If USD declaration is kept before publication of SCUC list, all central generating stations will declare for USD on each day.**

Scheduling Portal: Direct submission and updation of USD declarations for Generators may be enabled through the scheduling portal, replacing the current ineffective email-based process.

Mandatory Beneficiary Requisition: Prescribe a minimum requisition level for beneficiaries of Central Thermal Generating Stations**, in line with CEA Committee recommendations** to mitigate frequent Schedule below MTL.

MTL Protection for Lignite Stations: Ensure mandatory beneficiary requisitions to protect MTL schedules, considering linked-mine economics and the operational and safety risks of below-MTL operation. Alternately, allow only upward SCUC scheduling for lignite-fired stations with linked mines to maintain peak-demand reserves and **improve mine utilisation, reducing lignite costs.**

Comment – 3 (Shortening RTM Bidding Window)

No. 3. Amendment to Regulations 48 and 49 to facilitate shortening of timeline between revisions:
(B) Second phase of implementation : (2) The time "22.45" shall be substituted with time "23.15" and time "23.00" shall be substituted with time "23.20" in sub-clause (q)(ii) of Clause (1) of Regulation 49 of the Principal Regulations.

NLCIL welcomes the draft proposal for shortening the scheduling timeline for Real Time Market (RTM) but **truncation in bidding time period for each RTM session from 15min to 5min is found to be challenging** with certain operational constraints. Hence following are suggested :

- **SLDC Technical Readiness:** API-based automation, real-time data exchange and a uniform WBES platform across RLDCs/SLDCs may be ensured before reducing the RTM bidding window from 15 to 5 minutes.
- **Final DC & Schedule Availability:** Timely availability of final Declared Capability (DC) and schedule data may be ensured at the starting of bidding window without any further time delay.
- **Real-Time NOC Synchronization:** Availability of final NOAR NOC data at Power Exchanges may be ensured at the starting of bidding window to prevent bid rejections due to delayed updates.

Under MoP LPS rule to avoid any penalty in fixed cost recovery for URS power, **a defined tolerance mechanism for generator/trader-side technical glitches resulting in missed URS bids may be provided**, in line with the existing protection for NOAR and Power Exchange failures.

Above prerequisites may be ensured before implementing the shortened RTM bidding window to safeguard market liquidity, fair price discovery and avoid penalty in fixed cost recovery for URS power as per MoP LPS Rule.

Comment – 4 (RTM Bid Clearance Timeline)

Amendment to Regulations 48 and 49 to facilitate shortening of timeline between revisions:
(B) Second phase of implementation
*(3) The **time "23.00" shall be substituted with time "23.20"** in sub-clause (q)(iv) of Clause (1) of Regulation 49 of the Principal Regulations.*

sub-clause (q)(iv) of Clause (1) of Regulation 49 of the Principal Regulations is reproduced below:

*"The power exchanges shall clear the real-time bids from **23.00 hrs till 23.15 hrs** of "D-1" day based on the available transmission corridor and the buy and sell bids for the real time market (RTM) for the specified duration and intimate the cleared bids to NLDC by 23.15 hrs, for scheduling."*

While the start time of RTM bid clearance in Regulation 49(1)(q)(iv) is proposed to be changed from 23.00 hrs to 23.20 hrs, the end time remains unchanged at 23.15 hrs. This results in an inconsistent timeline.

It is requested to clarify the same and suitably amend/correct the end time to ensure consistency with the proposed Phase-II RTM scheduling timeline, if needed.



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