
NTPC R&R Colony, Darlipali


NTPC Bhadla


NTPC Kudgi

NTPC Submissions on Draft IEGC 2nd Amendment 2026

04.11.2026


NTPC Koldam


NTPC Kayamkulam


NTPC Rojmal

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Shortening of bidding window in Phase-II: (1/2)

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❑ RTM bidding window is proposed to be reduced from the existing 15 minutes to 5 minutes.

Difficulties being faced:

(i) Delay in availability of updated WBES/API data (generally updated data is available only after 5-6 min).

➢ **Rejection of bids due to exceeding NOC-limit:**

- NOC limit for a time block is DC minus schedule after right to recall ends for beneficiaries.
- Bids submitted based on URS at the starting of bidding window may exceed NOC-limit due delay in data updation in WBES.

(ii) Communication and processing time of RTM bidding requires communication across various nodes as shown in the figure below:



Hence the total processing time of around 8-9 minutes are required for RTM bidding.

In view of the above, either of the following proposals may be considered:

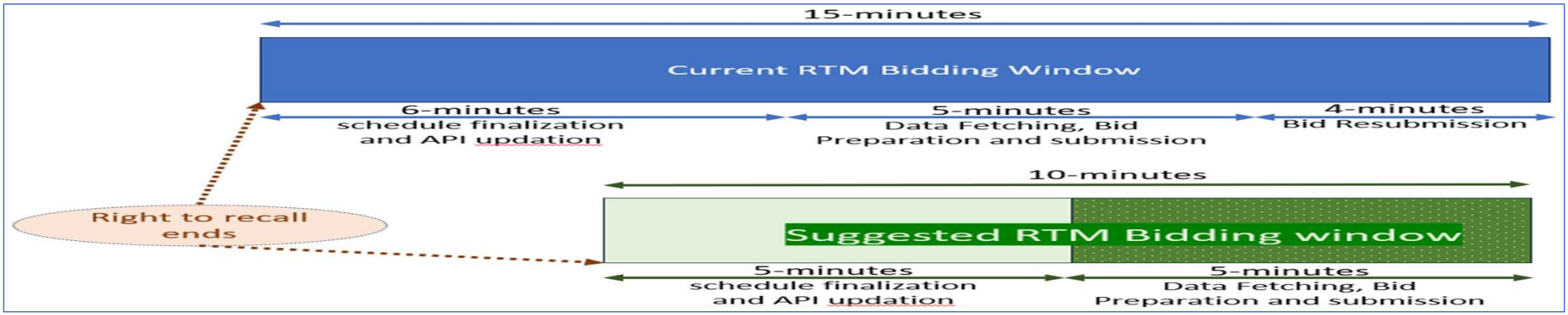
Proposal-1 : RTM bidding window time may please be continued to be kept at 15 Minutes.

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Shortening of bidding window in Phase-II: (2/2)

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Proposal-2: Provide RTM bidding window of 10 minutes (5 minutes as a buffer for data updatation and 5 minutes for bidding):



Proposal-3: No outright rejection of total bid quantum for exceeding NOC limit:

- Generators will bid from the start of Bidding Window for RTM.
- Bid quantum be accepted **minimum of available NOAR NOC or bid quantum received** while cross checking NOAR NOC quantum on IEX end as illustrated below:

Generator Bid quantum (MW) (A)	NOAR NOC Quantum (MW) (B)	IEX cleared Quantum (MW)	Remarks
100	99.5	0	**Complete Bid being rejected presently**
100	99.5	99.5	**Suggested for clearing MIN (A, B)**

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Adjustment of Schedule of energy cleared under DAM in case of USD

- Generators are required to offer the un-requisitioned power in day ahead market.(LPS rules-2022)
- If a unit is taken under USD, beneficiary schedules are reduced in the ratio of their requisitioned power.
- However, **Schedule from DAM sale remains unchanged and** total schedule of station may **exceed the on-bar DC.**
- It results is generation-demand imbalance and DSM implication on the generator due to under injection.
- Such under injection is beyond reasonable control of the Generator.

Illustrative example (SG exceeding on bar DC)

Station DC (MW)	1000			
	A	B		
ISGS Entitlement	500	500		
ISGS Schedule	400	400	Total Schedule	800
URS	100	100		
Total URS	200			
DAM sale	200			
New Entitlement after DAM sale				
Revised ISGS Entitlement	400	400		
ISGS Schedule	400	400	Total Schedule in including DAM	1000
New Entitlement and Schedule after USD				
Revised ISGS Entitlement	200	200	**On bar DC after USD**	**500**
Revised ISGS Schedule	200	200	**Total Schedule after USD**	**600**

If power scheduled through DAM cannot be supplied through other units in the same generating station on bar, such schedule may be reduced through SCUC Down /SCED-Down ensuring that total schedule does not exceed the on-bar DC of the generating station.

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Simplification of steps before SCUC and USD

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❑ The draft proposes multiple steps before USD. The sequence can be further simplified by removing repetitive steps as given below:

Draft Reg. timelines	Steps	Proposed Simplified Timelines
By 1400	**Tentative list of stations below MTL** by NLDC	By 1500
By 1430	**Information of proposed USD** by stations to RLDC/beneficiaries.	May be removed as beneficiaries are already aware of stations below MTL.
By 1530	**Upward revision** by beneficiaries to retain such units on-bar.	By 1630
By 1600	**USD declaration** if the schedule is <50% of MCR in any time block.	May be removed as final decision can be taken only after SCUC list publication.
By 1700	SCUC list Publication by NLDC.	By 1700
By 1800	**USD declaration** if the schedule is less than 50% of MCR in any time block.	By 1800

❑ **Restriction in Upward revisions by beneficiaries after publication of SCUC list :**

- To encourage more realistic schedules before SCUC exercise, a restriction may be imposed on upward revision in schedule from stations having below MTL schedules but not identified for SCUC except under exceptional circumstances.
- Allowing unrestricted upward revisions may alter the demand-supply position based on which the SCUC requirement was assessed.

Upward revision in schedule may be allowed only in exceptional circumstances to be recorded in writing.

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Minimum Off-Take obligation on Beneficiaries

- Many thermal stations receive below technical minimum or zero schedules during solar hours but are requisitioned fully during non-solar hours.
- Such stations are required to be on bar to meet demand during non solar hours.
- To remain on bar **largely dependent on the technical minimum support by NLDC** through SCUC and SCED.
- However, the capability of NLDC to provide MTL support is limited as only a few stations participate in SCUC/SCED.
- Presently there is no minimum offtake obligation on the beneficiaries to provide technically feasible schedule.
- The **CEA Committee Report** dated 30.06.2025 and **NLDC's Petition No. 713/MP/2025** have acknowledged that the responsibility for furnishing an operationally feasible schedule should also lie with the beneficiaries.

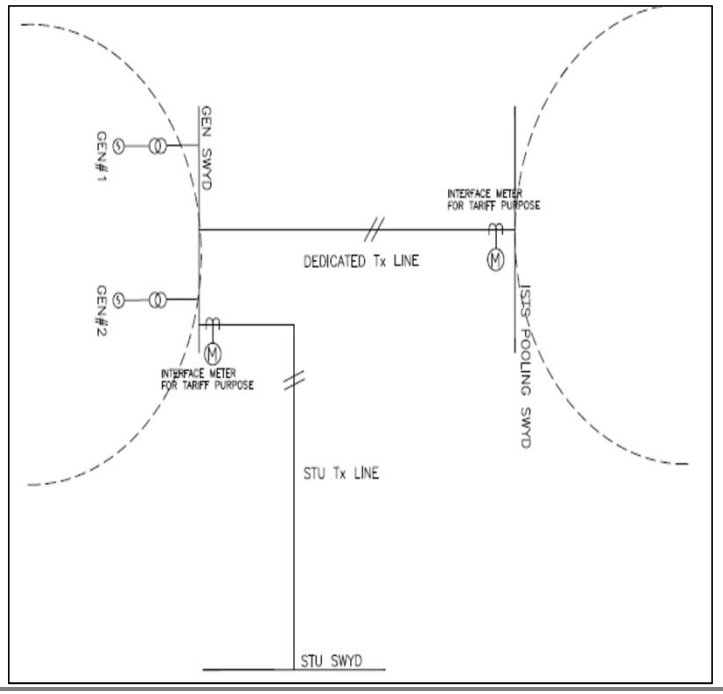
  Further, both have recommended the introduction of an offtake obligation on beneficiaries.

Minimum off-take obligation may be put on beneficiaries to provide technical minimum schedules during solar hours if availing power during non-solar hours.

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Metering issues in stations connected to ISTS through Dedicated Transmission Line

- IEGC-2023 provides for **computation of injection/drawal** based on the Interface Meters installed as per CEA Metering Regulations-2006.
- Many NTPC stations have been granted **connectivity to ISTS through DTL**.
- Transmission loss in DTL significantly vary with design and flow of power.
- **DTLs where a parallel STU Tx line exist,** The generation switchyard **virtually act as ISTS drawal point for the STU Network**.
- Power flow shall be as per network conditions/ even under Planned/forced outages.
- **Unambiguous Metering** of injection by the generator and DTL losses is not feasible if meters are installed at **ISTS end of DTL.**
- Loss in such DTL can't be determined and proportionally attributed to beneficiaries merely by applying a normative loss factor.



Computation of net injection/drawal may be based on meter installed at the generator's ex-bus, for stations connected to ISTS through a DTL.

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Refinements to the Unit Shut Down (USD) Framework for Thermal Stations (1/3)

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❑ **Eligibility Threshold for USD:**

- USD Eligibility if schedule below 50% of MCR.
- It renders units with schedules in the 50–55% range ineligible for USD.
- Operating at schedules below of 55% forces uncontrollable injection, thereby posing risks to grid stability and DSM implications for generators.

Threshold for USD eligibility be revised to a schedule below 55% of unit capacity for units not committed under SCUC.

❑ **Minimum off-bar and on-bar duration for USD:**

- The absence of a minimum off-bar/on-bar duration for USD units subjects thermal units to frequent start-stop cycles, leading to accelerated thermal and mechanical fatigue.

Minimum off-bar duration for USD and minimum on-bar duration on revival may be provided.

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Refinements to the Unit Shut Down (USD) Framework for Thermal Stations (2/3)

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❑ **Recovery of costs associated with USD:**

- During a USD, generators incur costs to run auxiliaries, transmission charges for drawing APC, secondary fuel oil costs for start-up.
- Instances of USD have increased considerably, leading to substantial increase in the expenses related to USD.

The recovery of APC costs, associated transmission charges, and start-up oil costs as a separate system service cost irrespective of the existing 7 start-up threshold may be provided.

❑ **Avoiding repetitive USD of same thermal units:**

- Some units are repeatedly left out from SCUC support and taken under USD thereby causing disproportionate stress on specific units.

The selection of units for USD (not considered for SCUC support) may be done in consultation with the generator, thereby preventing disproportionate stress on specific units.

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Refinements to the Unit Shut Down (USD) Framework for Thermal Stations (3/3)

❑ **Revision in startup timelines for supercritical units:**

- SCUC procedure dated 16.04.2024 provides revival times of 4, 8, and 12 hours for hot, warm, and cold start-ups respectively.
- Supercritical units require longer start-up durations compared to subcritical units due to stringent chemical parameter requirements.
- Cold clean-up of condensate and feedwater of around 12 hours prior to boiler light-up, followed by a hot clean-up of 12 hours, resulting in an additional 24 hours for cold start-up, while warm start-up requires an additional 7–8 hours.

The norms for start-up time for super-critical thermal units be revised to 15 hours for warm start-up and 36 hours for cold start-up.

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Incorporation of Payment security clause for Generators

- The draft Regulations provides for **regulation of access** to entities in the event of default in payment of statutory charges (viz DSM/congestion/reactive energy charge) or non-maintenance of the payment security mechanism.
- However, similar regulatory treatment is not mentioned where a buyer defaults in payment of dues to a Generator.
- The annual fixed charges/Energy charges being recovered by the generating stations are also statutory in nature, as they are governed by Regulations similar to those governing various statutory charges (viz. DSM, congestion, and reactive energy charges).
- To ensure parity in treatment of payment defaults arising between Generators and Buyers, the following provision may also be provided in the draft Regulations:

Electricity shall be scheduled or dispatched only if timely payment is made and adequate Payment Security Mechanism is maintained as per the contracts or the Rules prescribed by the Central Government or by the Commission.

Provided further that non-maintenance of Payment Security Mechanism or default in payment of outstanding dues, such defaulting entities shall be subject to Regulation of Power Supply & Transmission Access as per the contracts or the Rules prescribed by the Central Government or by the Commission.

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Other Submissions: (1/2)

❑ **Consent of beneficiaries for scheduling of infirm power after Successful trail run:**

- Draft proposes notice of **at least 7 days** to the contracted buyers for infirm power, prior to selling to any third party.
- The generating station may effectively have to wait for up to seven days after successful trial run.
- This may result in loss of opportunity for sale and avoidable non-utilisation of available generation.
- As contracted buyers are already aware of trial run (**48-hour prior notice)**, 1-day notice provides reasonable opportunity to buyer.

Notice period may be reduced to 1 day from the proposed 7 days for offering infirm power to the contracted buyers.

❑ **Ramp rate of Gas stations in Combined Cycle mode:**

- Gas Stations are mandated to declare a ramp up/down rate of **not less than 3%** per min **.**
- Gas Stations stations are capable of achieving ramp rate of up to 3% per min **in open cycle mode.**
- However, **ramping capability in combined cycle** is limited to 1% per minute due to inherent response time of the Waste Heat Recovery Boiler, which has characteristics similar to coal-based generating units.

The ramp rate requirement for Gas Stations may be modified as 1% per minute in combined cycle mode.

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Other Submissions : (2/2)

❑ **Signing authority of certificate of compliance before declaration of COD:**

- As per extant provisions, authorized signatory not below the rank of CMD or CEO or MD of the generating company.
- In large generating companies different functional areas are entrusted to respective Board-level Directors.

For administrative and operational flexibility, a Director on the Board of the company, duly authorized by the Board, may be permitted to sign the certificate of technical compliance prior to CoD.

❑ **Provision of Off-bar DC in case of Decommitment of unit:**

- Draft has provided that NLDC may run SCUC at any time of the day to commit or decommit a unit.
- The off-bar DC and treatment of capacity charges in such cases has not been expressly specified.
- To avoid any ambiguity, the following may be incorporated:

Once unit(s) of a generating station is decommitted, such generating station shall revise the On-bar DC and off-bar DC. The beneficiaries shall continue to bear the capacity charge corresponding to Total DC, including off-bar DC.

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Thanks