



To,  
The Secretary,  
Central Electricity Regulatory Commission (CERC),  
3<sup>rd</sup> & 4<sup>th</sup> Floor, Chanderlok Building, 36, Janpath, New Delhi – 110 001

05<sup>th</sup> September 2019

**Subject: Submission of comments/suggestions on proposed framework for Real Time Market (“RTM”) for Electricity.**

Dear Sir,

This is with reference to the public notice bearing no. RSS-14026(11)/2/2018/CERC captioned “**Proposed framework for Real Time Market for Electricity**” issued by Hon’ble CERC seeking comments and suggestion.

Accordingly, we are hereby enclosing comments and suggestions on the captioned amendment as Annexure I. We request the Honourable Commission to kindly consider the same while finalizing the Draft Amendment to the Principle Regulation.

Lastly, should there be any requirement, it would be a privilege for us to support the Honourable Commission by providing information/data relevant to the matter.

Yours truly,

**For ReNew Power Limited**

A handwritten signature in blue ink, appearing to read "Parag Sharma", written over a horizontal line.

**Parag Sharma**  
Chief Operating Officer  
ReNew Power Limited

**Central Electricity Regulatory Commission (Indian Electricity Grid Code) Regulation 2010**

S.No.	Description	Observation /Suggestion
1-	<p><b><u>Clause 5, Part 6 Regulation 6.5 (To be Added)</u></b></p> <p>“(aa) Scheduling of Real-time collective transaction: NLDC shall indicate to Power Exchange(s), margin available in each of the transmission corridors before the gate closure, i.e. before the window for trade closes for a specified duration. Power Exchange(s) shall clear the buy and sell bids for the said duration under consideration on various interfaces or control areas or regional transmission systems as intimated by NLDC. The limit for scheduling of collective transaction during real time for respective Power Exchanges shall be worked out in accordance with the directives of the Commission. NLDC shall furnish the available transmission corridors to the Power Exchange(s) before the trading for real time market or a specified duration closes. Based on the information furnished by NLDC, Power Exchange shall clear the RTM bids and announce the Market Clearing price and volume. Based on the volume cleared by the Power Exchanges, NLDC shall communicate the schedules to the respective RLDCs. After getting confirmation from RLDCs, NLDC shall convey the acceptance of scheduling of collective transaction to Power Exchange(s). RLDCs shall schedule the Collective Transaction at the respective periphery of the Regional Entities.”</p>	<p>We request the commission to please mandate publishing the real time corridor availability data public so that buyer/seller will be to make better decision before participating to Market.</p>
2-	<p><b><u>Clause (18) of Regulation 6.5 of Part 6 of the Principal Regulations</u></b></p> <p>“18. Revision of declared capability by the ISGS(s) having two-part tariff with capacity charge and energy charge and requisition by beneficiary (ies) for the remaining period of the day shall also be permitted with advance notice. Any revision in schedule made in odd time blocks shall become effective</p>	<p>We request this commission to amend the regulations to give effect to following:</p> <ol style="list-style-type: none"> <li>1. Such timeline for implementation/revision of schedule shall gradually decrease in</li> </ol>

**ReNew Power Limited**

(Formerly Known as ReNew Power Private Limited and ReNew Power Ventures Private Limited)

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	<p>from 7<sup>th</sup> time block and any revision in schedule made in even time blocks shall become effective from 8th time block, counting the time block in which the request for revision has been received by the RLDCs to be the first one</p>	<p>future to make the market more closer to real time and facilitate grid management.</p> <p>2. Wind and solar based projects shall also be treated at similar footing, as at present revision of wind and solar based generators need more time blocks.</p>
3-	<p><b><u>Regulation 6.5(A) of part 6 of the Principal Regulations</u></b></p> <p><i>Clause (c) shall be substituted as under:</i></p> <p><i>“(c) An ISGS may sell power from the share of its original beneficiaries in the day-ahead Market with the consent of such beneficiaries; and in the real-time market without the requirement of consent from the beneficiaries, before the trading for the real time market for a specified duration commences. In both the cases, the realized gains shall be shared between the ISGS and the concerned beneficiary in the ratio of 50:50 or as mutually agreed between the ISGS and concerned beneficiary in the billing of the following month. This gain shall be calculated as the difference between selling price of such power and fuel charge including incidental expenses.</i></p> <p><i>Provided that such sale of power by ISGS shall not result in any adverse impact on the original beneficiary (ies) including in the form of higher average energy charge vis-à-vis the energy charge payable without such sale:</i></p> <p><i>Provided further that there shall be no sharing of loss between the ISGS and the beneficiary (ies):</i></p> <p><i>Provided also that, the liability of fixed charge in such cases shall remain with original beneficiary (ies) as determined in accordance with the Tariff Regulations notified by the Commission from time to time.”</i></p>	<p>We request this commission to amend the regulations to give effect to following:</p> <ul style="list-style-type: none"> <li>- Any revenue made over and above the energy charges incurred by the generators shall be shared with DISCOMs in ratio of 50:50.</li> </ul>

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**Central Electricity Regulatory Commission (Open Access in inter-State Transmission) Regulations, 2008**

S.No.	Description	Observation /Suggestion
1-	<p>These regulations may be called the Central Electricity Regulatory Commission (Open Access in inter-State Transmission) (Sixth Amendment) Regulations, 2019.</p> <p><b><u>Amendment to Regulation 13 of the Principal Regulations</u></b></p> <p><i>All the entities participating in the real-time market for a specified duration may place their bids and offers on the Power Exchanges for purchase and sale of power. The window for trade in real-time market for day (Do) shall open from 22.45 hrs to 23.00 hrs of (D-1) for the delivery of power for the first two time blocks of 1st hour of (Do) i.e., 00.00 hrs to 00.30 hrs, and will be repeated every half an hour hereafter. The bidding mechanism for the real-time market shall be double-side closed bid auction for delivery of power in each time block of that hour. The Nodal Agency shall indicate to the Power Exchange(s) the available margin on each of the transmission corridors before the gate closure, i.e. before the window for trade closes for specified duration. The power exchanges shall clear the real-time market from 23.00 hrs till 23.15 hrs based on the available transmission corridor and the buy and sell bids for the RTM for the specified duration. Then the cleared bids shall be submitted by the Power Exchanges to the Nodal Agency for scheduling. The Nodal agency in accordance with the detailed procedure shall announce the final schedule by 23.45 hrs of (D-1) and communicate to the RLDCs to prepare the schedule for dispatch.</i></p>	<p><i>We request the commission to incorporate following:</i></p> <ol style="list-style-type: none"> <li><i>1. NLDC to publish the real time corridor availability data public so that buyer/seller will be in better position to decide before participating in Market</i></li> <li><i>2. NOC for collective should be self-sufficient so that unnecessary delay from SLDC for consent can be avoided</i></li> <li><i>3. NOAR should be in place before implementation of Real Time Market.</i></li> </ol>

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## Real-Time Markets for Electricity

S.No.	Description	Observation /Suggestion
1	<b>Proposed Real-Time Market (RTM) for Electricity</b>	<p>The presently proposed Deviation settlement Mechanisms (“DSM”) links the magnitude to DSM charges with the Market Clearing Price (“MCP”) determined under Day Ahead Market (“DAM) segment of power exchanges for the previous days. The intent of such amendment is to make DSM charges reflective of real time market price thereby creating a commercial arrangement making electricity drawal from DSM account costly and promote efficient planning by grid participant.</p> <p>At present the DSM charges are linked with the daily average MCP for previous day. Which still is unable to manage deviations during the peak hours when the price of electricity is high as compared to daily average prices. To deal with the situation and to create more liquidity in the market there is a need to link the DSM charges with the time block wise MCP which will ensure the following:</p> <ol style="list-style-type: none"> <li>1. Better resource planning by the grid participants.</li> <li>2. Cost reflective RTM market with adequate liquidity.</li> </ol>
2	<b>Real time NOC processing by system operator for Real-Time Market</b>	<p>There is need to develop real time NOC issuance system at state and regional level for implementation of Real Time market.</p> <p>A central agency needs to be created for issuance of real time permission for transaction of power. Such agency should be linked to all State Load Despatch Centre through a robust IT system. The agency should be authorise to interact with system operators at various level on behalf of participants seeking approvals.</p>

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