

To,

Date: 13/10/2023

The Secretary,
CERC, 3rd & 4th Floor,
Chanderlok Building,
36, Janpath, New Delhi-110001

Sub: Staff Paper on "Market Coupling"-Comments of SAPL

Ref.: Public Notice No. Eco-14/1/2023-CERC dated 21.08.2023

Sir,

Please find enclosed herewith comments on Staff Paper on "Market Coupling" published by CERC at its website on dated 21.08.2023 for your kind consideration.

1. Timing of the Market Coupling Proposition: With trading percentage ranging between 8% to 11% of all India generation, the objective of coupling as stated in the paper, shall hardly be met. The volume is minuscule to lead to any desired result. Hon'ble commission should re-assess the scheme after quantitative and sensitive analysis based on the actual volumes being transacted in the market.
2. Role of Power Exchange post market coupling: As proposed in the paper, the role of Power Exchanges, especially in the DAM market shall only restrict to compliance of procedural part. The existing exchanges and proposed OTC shall have no incentive to get deeper into the market and may lead them to cost cutting measures including but not limited to technology platforms.
3. With current products in the market (DAM/TAM/LDC/BANKING), the stakeholders are completely aligned to cover the surplus and deficit scenario and complements each other. Thus, coupling shall not serve the intended purpose in near future.

Thanking you,

For SHUBHEKSHA ADVISORS PRIVATE LIMITED



Niraj Kumar
Director

