

To
The Secretary,
Central Electricity Regulatory Commission,
6th, 7th & 8th Floor, tower B, World Trade Centre,
Nauroji Nagar, New Delhi-110029

Subject: CERC Draft Order dated 04.10.2024 in Petition No.: 8/SM/2024 in the matter of Directions by the Commission to the Power Exchanges registered under the Central Electricity Regulatory Commission (Power Market) Regulations, 2021.

Reference: CERC Draft Order dated 04.10.2024 in Petition No.: 8/SM/2024.

Dear Sir,

Greetings from ReNew Private Limited!

ReNew Pvt. Ltd. is one of the largest renewable power producers in India, having an aggregated portfolio of ~20 GW, including more than 10 GW of operational capacity. We have portfolio of solar, wind & hydro assets with presence over ten states in the country. The company is also the first Indian renewable company to be listed on NASDAQ.

This is in reference to Draft Order dated 04.10.2024 in Petition No.: 8/SM/2024 inviting comments/suggestions in the matter of Directions by the Commission to the Power Exchanges registered under the Central Electricity Regulatory Commission (Power Market) Regulations, 2021. We are herewith submitting our comment as per **Annexure-1**.

We request your good office to kindly consider our comment while finalizing the same.

Thanking you.

Yours Sincerely,



for ReNew Private Limited



ReNew Private Limited
(Formerly known as ReNew Power Private Limited)

CIN: U40300DL2011PTC291527

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ANNEXURE-1

Clause No. in Draft CERC Order	Segment	CERC Proposal	Our Submission
Clause No. 24 (c)	Intraday Contract	In view of the very low liquidity in Intra Day Contracts since its introduction, the availability of the alternative Real-Time Market, and to avoid market fragmentation, it is proposed to withdraw Intra-Day Contracts in all the Power Exchanges from a pre-specified date, in terms of Regulation 25(3) of PMR 2021.	<p>1. Intraday Contracts with Continuous matching methodology provides an optional platform (other than RTM) for participants to meet their exigency requirements and ensuring 100% bid clearance, unlike RTM where partial clearance is also possible due to auction based methodology.</p> <p>2. RE Generators do not have RE Specific Contracts in RTM market at present. However, Intraday Market has Green Products which enables RE Generators to submit their surplus generation bids, thus managing RE Intermittency.</p> <p>3. Multiple contracts of different matching mechanism (Intraday & RTM) enables power market to be more vibrant and competitive. Merely due to its low liquidity should not be a reason for withdrawing it from market.</p> <p>4. In Case of Intraday GTAM Contract, Minimum Bid Qty. is 0.22 MW at present (having resolution upto 2 decimal points). However, RTM market provides resolution of only 1 decimal point, with min. bid Qty of 0.1 MW. Since RE Generation forecasting is done upto 2 decimal points, accuracy of RE Bid Qty. is better in Intraday GTAM than in RTM market.</p> <p>5. Unlike Intraday, there is risk of session getting abort in RTM and hence it is not a reliable market for must run generators like wind and solar.</p> <p>Keeping in view of above mentioned points and to promote RE Generation, we propose to retain Intraday Product in exchange.</p>
Clause No. 24 (d)	Day-Ahead Contingency Contract	It is proposed to modify the price discovery mechanism in the case of Contingency Contracts to Uniform Price Step Auction from the existing Continuous matching . The Commission proposes to issue amendment(s) in PMR 2021 to this effect.	<p>1. Objective of DAC Contracts is to address the unexpected changes or contingencies that occur after closing of Day Ahead Market (DAM). To ensure these contingencies are met, continuous matching allows 100% clearance of Buy and Sell Bids (subject to availability of transmission corridor), unlike auction based matching where pro-rata clearance may occur during the period of less liquidity in market.</p> <p>2. Continuous Matching ensures serious participation:- Once the bid qty. and bid price gets matched, trade is executed and delivery takes place as per schedule. Unlike auction, participants cannot withdraw their bids, once matching is done.</p> <p>3. Continuous Matching ensures transparency and competitiveness:- Both Seller and Buyer are able to see all offers (Bid Qty. and Bid Price) submitted in the market. Once the best buy and sell offer gets matched, trade is executed.</p> <p>4. It is pointed out in Clause no. 15 of Draft CERC Order that from October 2023 onwards, there has been significant variation in the prices, with prices in DAC remaining consistently higher than DAM. However, this observation is based upon weighted average price of transactions in DAM and DAC. Since TAM Bids reflect only the uncleared qty./unmet demand from DAM market which mostly consist of morning and evening peak hours when prices in both DAM & DAC are higher than off-peak hours, weighted average price of DAC segment will be higher than DAM segment (which consists of volume during off-peak hours too). So the comparison of weighted average price in DAC & DAM segments is not justified.</p> <p>Keeping in view of above mentioned points, we propose to retain Continuous Matching methodology in DAC Contracts of exchange.</p>
Clause No. 24 (a)	Daily/Weekly/Monthly Contracts	All Power Exchanges shall allow only the established pre-specified slots on the exchange platform for TAM contracts (including HP-TAM). These pre-specified slots shall include Base/RTC, Peak, Off-Peak (other than peak), and Night, wherein the peak period would be as defined by the NLDC. In the case of G-TAM, Power Exchanges shall have the liberty to pre-specify slots based on the generation profile of different technologies, as provided by the sellers. Exchanges should submit the pre-specified contracts for approval of the commission.	<p>1. We agree with the proposal that in G-TAM, Power Exchanges shall have the liberty to pre-specify slots based on the generation profile of different technologies, as provided by the sellers.</p> <p>2. In addition to above, RE-Generators should also have an option of energy based contracts :- Due to variation in Solar & Wind Generation, RE Generators find it difficult to oblige RTC/Peak/Off-Peak Contracts in which block-wise qty. is to be met. Instead, there should be an option of energy based contracts, in which total energy to be supplied shall be kept fixed, irrespective of block-wise qty.</p>

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Clause No. in Draft CERC Order	Segment	CERC Proposal	Our Submission
Clause No. 24 (b)	Any-Day Single-Sided Contracts (ADSS)	<p>All Power Exchanges shall follow the timelines for different stages of ADSS contracts, including the bid receiving window/submission of interest quantity by sellers, IPO auction, Reverse Auction, and Bid acceptance window as follows:-</p> <p>Bid Receiving Window :-Max. 2 days (48 hours)</p> <p>IPO Auction :- Max. 2 hours (120 mins)</p> <p>Reverse Auction:- Min. 2 hours (120 mins) with an extension up to 24:00 Hrs of auction day</p> <p>Acceptance Window :-Max. 2 days (48 hours)</p>	We agree with the proposal
Clause No. 24 (e)(i)	Day-Ahead Contingency Contract	Power Exchanges to make changes in the software/market watch so that all the parties are able to see all the buy and sell offers for 10 minutes before the order gets transferred to the order book; after the expiry of this period, best buy and sell bids get cleared.	<p>This could be implemented for weekly or other longer duration contracts, but shouldnot be implemented for Intra-day and Day Ahead Contingency (DAC) contracts because these contracts are closer to delivery and any such delay/extension in time is not advisable.</p> <p>Also it is not clear that whether session will be extended once for 10 mins, or will keep on extending unless there is no new best bid for 10 mins.</p>
Clause No. 24 (e)(ii)	Day-Ahead Contingency Contract	Power Exchanges to display information regarding the number and volume of bids received (both buy and sell) on their website, in addition to the data on traded volume.	We agree with the proposal