No. IEX/RA/049/25-26 Date: 17.10.2025

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

Sub: IEX suggestions on the Draft proposal in 09/SM/2025 for "Determination of value of "X" for computation of the deviation (in %) for Wind and Solar (WS) Sellers from 01.04.2026 onwards under the provisions of the Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) Regulations, 2024."

Dear Sir,

This has reference to Public Notice dated 10.09.2025 inviting suggestions and comments from stakeholders on the subject draft proposal of "Determination of value of "X" for computation of the deviation (in %) for Wind and Solar (WS) Sellers from 01.04.2026 onwards under the provisions of the Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) Regulations, 2024".

We understand that the proposed changes to the value of X for computation of DSM for WS sellers seek to ensure that such RE sellers do not deviate from and adhere to their schedule of drawal and injection of electricity in the interest of security and stability of the grid. Alongside the reduction in the 'revenue-neutral' tolerance band for Solar/ Wind-Solar Hybrid Generating Stations from the existing +/- 10% to +/- 5% and for Wind Generating Stations from the existing +/- 15% to +/- 10% from 01.04.2026 onwards which is already part of the DSM Regulations 2024, the Hon'ble Commission has proposed a phased transition to use 'Scheduled Generation' in the formula for computing deviation (%) for such sellers. The

above changes may also lead to volume/commercial loss for these Sellers as has been depicted in the simulations done by the Hon'ble Commission.

In this context, we bring to your kind attention the Petition No. 277/MP/2024 filed before the Hon'ble Commission on 12.07.2024 by IEX requesting approval of the Green Real Time Market (G-RTM) at IEX platform. Through the said Petition and based on stakeholders' consultations, we have highlighted the need to have G-RTM to provide alternate avenues closer to delivery for buy/sale of RE power. Since the proposed tightening of deviation bands would require RE participants to use market optimally, it is requested that G-RTM, which will help them to manage their variations, be kindly approved by the Hon'ble Commission. There is a need of an avenue to provide real time dispatch of RE power to reduce the impact of forecasting errors or fulfil the obligations of RE Sellers.

Considering the subject proposal of the Hon'ble Commission, it is requested that the proposed product be considered to facilitate management of RE variations through market while retaining the green attributes for the same. We request to consider the suggestions while finalising the proposal.

Thanking You

Yours Sincerely,

Gaurav Maheshwari
Vice President (Regulatory Affairs)