JINDAL INDIA
RENEWABLE ENERGY
Promoted by BC Jindal Group

JINDAL INDIA RENEWABLE ENERGY LIMITED
REGD. OFF: HABITAT INDIA, C-3, QUTAB INSTITUTIONAL AREA,
KATWARIA SARAI, NEW DELHI- 110016
CIN NO. U74110DL2015PLC276224

Ref: JIREL/RA/Secretary/CERC/DSM/FY 26/01
Date: 07.10.2025

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

Sub: comments on Determination of value of "X" for computation of the deviation (in %) for Wind and Solar (WS) Sellers from 01.04.2026 onwards.

Ref:

1. CERC's public notice no L-1/260/2021/CERC dated 10.09.2025.
2. CERC's proposal under Petition No. 9/ SM/2025 (Suo-Motu) dated 10.09.2025.

Respected Sir,

We would like to introduce 'Jindal India Renewable Energy Limited' (JIREL), Renewable energy arm of B.C. Jindal Group. JIREL is an Independent Power Producer (IPP) primarily focusing on investment in developing the generating capacities based on new technologies and methods involving combined generation of wind and solar power and other emerging technologies like Battery storage system.

CERC vide above referred notice dated 10.09.2025 has invited comments from stakeholders on proposal dated 10.09.2025 regarding 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.

India's renewable energy (RE) sector is rapidly expanding, and with higher RE penetration, deviations from scheduled generation become a critical issue for grid stability and market efficiency. With increasing RE penetration, the band for deviation in renewable energy is being made more stringent and the CERC DSM regulation 2024 has factored scheduled energy as a determinant of deviation error calculation. The CERC vide draft order dated 10.09.2025 has proposed the migration from Available capacity to scheduled generation, in denominator of formula calculating deviation percentage.

In view of above, the comments/suggestions/objections on the draft order are detailed hereunder. We humbly request the Hon'ble Commission to take into consideration the below comments/suggestions/objections while finalising the order.

Yours faithfully,
For Jindal India Renewable Energy Limited

Authorised Signatory

Jindal India Renewable Energy Limited

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Comments on CERC order dated 10.09.2025 pertaining to Determination of value of "X" for computation of the deviation (in %) for Wind and Solar (WS) Sellers.

A. **The Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) Regulations, 2024 (DSM Regulation 2024) has been challenged before Delhi High court and same is sub judice.**

The Sustainable Projects Development Association (SPDA) has challenged The DSM regulations 2024 before Delhi High court vide Writ Petition no 14783/2024, subsequently other associations Wind Independent Power producer Association (WIPPA) and Indian Wind Power Association (IWPA) Impleaded in same matter.

The High Court of Delhi Wide order dated 20.11.2024 directed that no coercive steps, pursuant to the impugned Regulation, shall be taken against the petitioners till the next date of hearing. The relevant portion of order is reproduced below.

The learned senior counsel for the petitioners has drawn our attention to the order dated 12.01.2023 passed by this Court in WP(C) No.270/2023 titled National Solar Energy Federation of India & Ors. v. Union of India & Ors., to contend that similar impugned Regulation dated 14.03.2022 is challenged by the petitioner in the said petition and by the abovementioned Order, this Court has directed that no coercive steps be taken against the petitioners till the next date of hearing. He submits that the said interim order continues till date and the petition is now listed for hearing on 08.01.2025. He submits that similar challenge is raised in the present petition as well.

In view of the submissions made, it is directed that no coercive steps, pursuant to the impugned Regulation, shall be taken against the petitioners till the next date of hearing

Further the Delhi high court vide order dated 31.07.2025 directed to post this matter on 09.12.2025.

The DSM regulations 2024 is sub-judice hence issuance of order dated 10.09.2025 by CERC, in view of DSM Regulation 2024 is in contravention to the direction of Delhi High court.

We therefore respectfully submit that the Commission to suspend operational enforcement of the Order dated 10.09.2025 till the matter concerning the DSM Regulations, 2024 is finally decided by the Hon'ble High Court. This will ensure consistency with judicial directives and avoid any potential contempt or conflict with ongoing proceedings.

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B. Aggregation at pooling station

The commission has allowed aggregation of schedules of solar and wind generators at pooling station. This would result in reducing the overall deviation of such generators by giving an aggregate schedule. However, there is no clarity if all generators connected to a particular pooling station must mandatorily go in for aggregation.

The aggregation of schedules will lead to a reduction in DSM charges but to harness the best impact of aggregation the aggregation of all schedules at a given pooling substations is a must. The "Tamil Nadu Electricity Regulatory Commission (Forecasting, Scheduling and Deviation Settlement and related matters for Wind and Solar Generation) Regulations, 2024" has stipulate for mandatory aggregation of schedule at a given substation'

The Relevant portion of recent TNERC DSM Regulation 2024 is reproduced below

"6. Principles of appointment of QCA

6.1. The Generators connected to each Pooling Sub-Station shall appoint a person/entity as a (i) Single QCA for whole State or (ii) QCA for the particular PSS to which the generators are connected or (iii) Opt SLDC for adopting their forecast as stipulated in Regulation 5.1. Provided that the QCA appointed by the majority of the Generators for a particular Pooling Sub-Station shall be a Deemed QCA for all generators of that Pooling Sub Station. Provided further that the same QCA can be appointed for any number of Pooling substations, whereas multiple QCAs for single Pooling sub-station will not be permitted."

In view of the above we request CERC to issue a clarification to mandate pooling substation wise aggregation ensuring same QCA at one pooling substation.

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