ALL INDIA DISCOMs ASSOCIATION

(Registered Society: S/ND/54/2024)

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Save Energy!
Save Nation!!

No. RA-11/AIDA-2025

Dated: October 3, 2025

To

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

(Email: secy@cercind.gov.in and advisor-re@cercind.gov.in)

Sub: AIDA Comments on determination of value of "X" for computation of the deviation (in %) for Wind and Solar (WS) Sellers and bringing the RE generation plants on parity with conventional generators in DSM Charges.

Ref: CERC Public Notice No. L-1/260/2021/CERC dated 10th September, 2025

Sir,

With reference to the subject mentioned above, please find below the comments of AIDA, for consideration of CERC:

Based on the responses/deliberations/discussions at different platforms and the interest of the member Discoms of AIDA, the responses are framed, as below:

1. The proposed trajectory for reduction of 'X' factor for 5 (five) years (w.e.f. 01.04.2026 to 31.03.2031) may be reduced to 3 (three) years (w. e. f 01.04.2026 to 31.3.2029). In view of the availability of improved forecasting techniques and increased maturity of WS renewable energy sources, a three-year transition period is considered adequate and reasonable for bringing down the value of 'X' to zero, thereby ensuring timely compliance and strengthening grid discipline. The tightening of control period will not involve significant capital expenditure. The period of next three years will be critical for severe grid operations during which grid scale storage is likely to be scaled up. As such, the new WS projects are also expected to demonstrate the same level of discipline and compliance as conventional generators from 2026, which is crucial for ensuring long-term grid reliability amidst the rising share of RE in the generation mix.

2. In view of the increasing challenges to grid stability, particularly with the rising share of renewable energy in the generation mix, it is suggested that the frequency limit be revised to 50.02 Hz instead of the proposed 50.05 Hz. This would enable stricter frequency discipline and contribute to enhanced reliability and security of grid operations.

Yours sincerely,

(Satyendra Nath Kalita)