Prashant Verma
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No. 405 **/RAU/Regulation** **Dated:** 31 **October, 2025**

Secretary,
Central Electricity Regulatory Commission,
World Trade Centre, 6th, 7th & 8th Floor,
Tower-B, Nauroji Nagar, New Delhi-110029
Mail: secy@cercind.gov.in

Subject: Regarding comments/suggestions on draft order dated 10.09.2025 of Petition 9/ SM/2025 (Suo-Moto) of Central Electricity Regulatory Commission in the matter of determination of the value of "X" to be applied in the formula for computing deviation (%) of Wind and Solar (WS) Sellers from 01.04.2026 onwards.

Sir,

Please refer to the draft order dated 10.09.2025 of Petition 9/SM/2025 (Suo-Moto) of Central Electricity Regulatory Commission, New Delhi on the above subject. The desired comments of U.P. Power Corporation Ltd. on the subject matter are enclosed herewith.

Thanking You.

Yours faithfully,

31/10/2025

(Prashant Verma)
Director (Comm.)

Comments/suggestions on draft order dated 10.09.2025 of Petition 9/ SM/2025 (Suo-Motu) of Central Electricity Regulatory Commission.

Clause / Para	Existing Proposal (as per Draft)	UPPCL Comment / Suggestion	Rationale / Justification
Para 22	CERC has proposed a **5-year trajectory** for reduction of 'X': • 2026–27 → 100% • 2027–28 → 80% • 2028–29 → 60% • 2029–30 → 40% • 2030–31 → 20% • 2031 onwards → 0%	The proposed **5-year trajectory** may be **compressed to 3 years**: • 2026–27 → 100% • 2027–28 → 50% • 2028–29 → 0%	➤ Forecasting and scheduling of WS projects have improved significantly; 3 years are adequate for transition. ➤ Earlier shift to **Scheduled Generation-based deviation** will enhance **grid discipline**. ➤ Aligns RE generators with conventional generators ahead of large-scale storage integration.
Para 24(b)	All new WS projects with **tendering or bid submission date on or after 01.04.2026** shall be treated at par with **General Sellers (X=0)**.	**UPPCL strongly supports the tighter tolerance bands.**	➤ Ensures **uniform treatment** for new WS projects. ➤ Promotes **accurate forecasting** and **responsible scheduling** from inception. ➤ Avoids continuation of relaxation regime for new projects.
Para 2 (Reg. 8)	**Tolerance Band tightening** w.e.f 01.04.2026: • Solar ±10% → ±5% • Wind ±15% → ±10%	**UPPCL strongly supports the tighter tolerance bands.**	➤ **Discom perspective:** Improved WS forecasting accuracy enables **better schedule optimisation** and **DSM cost reduction.** ➤ Encourages adoption of **advanced forecasting tools** by WS Sellers. ➤ Supports **grid reliability** and efficient RE integration.

Prateek

(Prateek Kushwaha)
Executive Engineer (RAU)