Manish K. Singh
Secretary General

InWEA/62/2025-26 October17, 2025

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

Subject: Comments / Suggestions on Draft **Suo-Motu Order by** Central Electricity Regulatory Commission in the matter of **Petition No. 9/ SM/2025 (Suo-Motu) for** CERC (Deviation Settlement Mechanism and Related Matters) Regulations, 2024 - regarding

Dear Sir,

This is with reference to the publication of the Draft Suo-Motu Order in matter of Petition No 9/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 CERC (Deviation Settlement Mechanism and Related Matters) Regulations, 2024, published on website of Hon'ble Commission on 10th September 2025 for inviting comments on the same.

2. Indian Wind Energy Association (InWEA) is an association registered at New Delhi to represent the interest of various stakeholders in wind energy sector across various states in India. At the outset, we would like to compliment the Hon'ble Commission for its continuing endeavour for promoting renewable energy in India.

3. However, the provisions of proposed draft Suo-motu Order outlining provisions for X for Renewable Energy project in general and Wind Energy in particular, would have grave implications for business operations and future revenue potential for wind energy projects in India. **It would have grave implications on investment opportunity in wind sector by potential investors.** We have undertaken comprehensive analysis of some of the provisions and also suggested course correction in our comments, for kind consideration and perusal of the Hon'ble Commission. Our detailed observations, comments and suggestions are mentioned in **Annexure I** as enclosed herewith.

I, Manish K. Singh, am duly authorised by Indian Wind Energy Association to file these comments/suggestions on its behalf.

Thanking you,

Yours truly,
S/d

(Manish K. Singh)

Comments on CERC Petition No. 9/SM/2025 vide Proposal dated 10th September 2025

1.1 The Central Commission has notified the **CERC (Deviation Settlement Mechanism and Related Matters) Regulations, 2024 on 5th August 2024** where the Commission has highlighted the deviation settlement mechanism for Wind, Solar and Hybrid Sellers. The Regulations include the formulae for computation of deviation, volume limits, tolerance bands, linking of deviation rates to contract (PPA) rates and the role of QCAs in scheduling of solar and wind generators.

1.2 As per clause 2(b) of Regulation 6, the Commission has incorporated the **"X" factor,** based on scheduled generation, into the formula for calculating deviations for Wind and Solar (WS) Sellers, and specified that its value will be determined through a separate order following public consultation. Subsequently, on 10th September 2025, through **Petition No. 9/SM/2025 (Suo Motu)**, the Commission proposed the determination of the "X" factor for computing deviation (in %) for **WS sellers, effective from 1st April 2026**, in line with the provisions of these Regulations, and invited stakeholders to submit their comments and suggestions on the proposal.

1.3 In response to the above, we have submitted our comments on the Commission's proposal for **determination of "X" Factor** for computation of deviation (in %) for WS Sellers are as follows:

<table>
<tr><th>#</th><th>Provisions in CERC DSM Regulations, 2024</th><th>CERC Proposal 9/SM/2025</th><th>Stakeholder's Comments</th></tr>
<tr><td>1</td><td colspan="3">Regulation 6(2): Computation of Deviation for WS Sellers</td></tr>
<tr><td>1.1</td><td>Clause 2(a) of Regulation 6
"6 (2) ….
a) For the period from the date of commencement of these regulations to 31.03.2026
Deviation-WS seller (DWS) (in MWh) = [(Actual Injection in MWh) – (Scheduled generation in MWh)];
Deviation-WS seller (DWS) (in %) = 100 x [(Actual Injection in MWh) – (Scheduled generation in MWh)] / [(Available Capacity)];"</td><td rowspan="2">• The Commission has discussed the importance of shifting the deviation formula from available capacity to schedule generation.
• The Commission's analysis has shown the impact of DSM on the revenue of 6 wind plants under different values from X =100% to X=0%.
• However, the detailed analysis showed that the Wind plants showed a higher revenue loss range as follows:
For X=100%: 2.8% to 9.4%
For X=0%: 17% to 48.2%
• Further, the Commission has proposed the trajectory in reduction of "X" Factor for existing RE projects (WS sellers) as follows:
<table><tr><th>With Effect From</th><th>Value of "X"</th></tr></table></td><td rowspan="2">• The Commission's Analysis indicates that the highest impact was seen in case of existing wind power plants, where the percentage revenue loss was significantly increased from 2.8% to 48.2% with the decrease in value of "X".
• Further, we have carried out an analysis to study the impact of prevailing DSM Regulations and CERC's proposal on existing wind project plants. The study covered the three wind project sites. It has been observed that with the decrease in value of "X", the mean</td></tr>
<tr><td>1.2</td><td>Clause 2(b) of Regulation 6
"6(2) ……
b) For the period from 01.04.2026 onwards</td></tr>
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<table>
<tr><th>#</th><th>Provisions in CERC DSM Regulations, 2024</th><th>CERC Proposal 9/SM/2025</th><th>Stakeholder's Comments</th></tr>
<tr>
<td></td>
<td>Deviation-WS seller (DWS) (in MWh) = [(Actual Injection in MWh) – (Scheduled generation in MWh)];

Deviation-WS seller (DWS) (in %) = 100 x [(Actual Injection in MWh) – (Scheduled generation in MWh)] / [(X% of Available Capacity) + (100-X) % of Scheduled Generation):

Provided 'X' shall be stipulated by the Commission through separate order(s) after public consultation."</td>
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<table>
<tr><td>01.04.2026 to 31.03.2027</td><td>100%</td></tr>
<tr><td>01.04.2027 to 31.03.2028</td><td>80%</td></tr>
<tr><td>01.04.2028 to 31.03.2029</td><td>60%</td></tr>
<tr><td>01.04.2029 to 31.03.2030</td><td>40%</td></tr>
<tr><td>01.04.2030 to 31.03.2031</td><td>20%</td></tr>
<tr><td>01.04.2031 Onwards</td><td>0%</td></tr>
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<td>
absolute error (MAE) for the existing wind power projects significantly drops and is going to face higher DSM penalties, leading to reduced and more volatile revenue.

The increase in revenue loss corresponding to the decrease in value of "X" for three wind sites are as follows:
<table>
<tr><th>Value of "X"</th><th>Site 1</th><th>Site 2</th><th>Site 3</th></tr>
<tr><td>Existing Regulations</td><td>0.84%</td><td>0.00%</td><td>0.23%</td></tr>
<tr><td>X=100%</td><td>1.20%</td><td>0.71%</td><td>2.93%</td></tr>
<tr><td>X=90%</td><td>1.49%</td><td>0.86%</td><td>3.53%</td></tr>
<tr><td>X=80%</td><td>1.87%</td><td>1.06%</td><td>4.30%</td></tr>
<tr><td>X=70%</td><td>2.37%</td><td>1.33%</td><td>5.29%</td></tr>
<tr><td>X=60%</td><td>3.05%</td><td>1.72%</td><td>6.61%</td></tr>
<tr><td>X=50%</td><td>4.02%</td><td>2.30%</td><td>8.43%</td></tr>
<tr><td>X=40%</td><td>5.47%</td><td>3.21%</td><td>11.1%</td></tr>
<tr><td>X=30%</td><td>7.83%</td><td>4.80%</td><td>15.2%</td></tr>
<tr><td>X=20%</td><td>12.2%</td><td>7.98%</td><td>22.2%</td></tr>
<tr><td>X=10%</td><td>22.15%</td><td>15.89%</td><td>37.76%</td></tr>
</table>

It may be noted that 1% revenue loss for LCoE of INR 3.5-4 per unit for existing wind power projects amounts to direct revenue loss of Paise 3-4 per unit for each percentage of revenue loss. To put it in context, the RoE component of LCoE is around 30-40 paise per unit (or even lower considering recent trends under competitive bidding). which is 10-15% of total tariff/LCoE. Thus, revenue loss

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#	Provisions in CERC DSM Regulations, 2024	CERC Proposal 9/SM/2025	Stakeholder's Comments
			of 15% to 37% would completely wipe out RoE for the wind power project investor. Thus, with proposed dispensation of 'X' factor, the revenue loss on account of Deviation Charges would lead to no returns for wind project investor. • This will cause grave revenue implications for wind investors and wind developers would be vary of investing in Wind power projects in future and existing wind developers would suffer extensively. • Further, with the simultaneous introduction of "X" Factor and tightening of error bands results in the significant increase in deviation charges. • Although the current DSM charges are based on available capacity, a shift to 100% schedule-based deviation will significantly increase the impact on revenue. • **Hence, the Hon'ble Commission is requested to defer the introduction of proposed X factor by at least 5 years and may introduce phased wise implementation of "X" Factor for the new projects for the period from 01.04.2031 onwards and then successfully tighten the tolerance**

<table>
<tr><th>#</th><th>Provisions in CERC DSM Regulations, 2024</th><th>CERC Proposal 9/SM/2025</th><th>Stakeholder's Comments</th></tr>
<tr><td></td><td></td><td></td><td>bands to move on to schedule-based regime.</td></tr>
<tr><td>2</td><td colspan="3">Regulation 8(4): Volume Limits & Tolerance Bands for WS Sellers</td></tr>
<tr><td>2.1</td><td>For the period from the date of commencement of these Regulations to 31.03.2026
<table>
<tr><th>WS Seller</th><th>Till 31.03.2026</th></tr>
<tr><td>For Solar or Hybrid (wind solar) generating stations</td><td>VLwS (1) = Deviation up to 10% DWS
VLwS (2) = Deviation beyond 10% DWS and up to 15% DWS</td></tr>
<tr><td>For Wind Generating Stations</td><td>VLwS (1) = Deviation up to 15% DWS
VLwS (2) = Deviation beyond 15% DWS and up to 20% DWS</td></tr>
</table></td><td rowspan="2">The Commission has proposed a table of comparison of the percentage of time the RE generating stations remained within the revenue-neutral deviation tolerance band under both existing and the new DSM tolerance band proposed from 01.04.2026.
<table>
<tr><th rowspan="2">RE Generating Stations</th><th colspan="2">Till 31.03.2026</th><th colspan="2">From 01.04.2026 Onwards</th></tr>
<tr><th>Tolerance band</th><th>% Time within the band</th><th>Tolerance Band</th><th>% Time within the Band</th></tr>
<tr><td>Solar</td><td>+/-10%</td><td>74% - 84%</td><td>+/-5%</td><td>45% - 58%</td></tr>
<tr><td>Wind</td><td>+/-15%</td><td>73% - 93%</td><td>+/-10%</td><td>32% - 73%</td></tr>
<tr><td>Hybrid</td><td>+/-10%</td><td>72% - 87%</td><td>+/-5%</td><td>38% - 47%</td></tr>
</table></td><td rowspan="2">From the table, it is observed that the significant reduction in tolerance band from +/- 15% to +/- 10% is expected to impact the forecast accuracy of Wind generators. These results highlight the need for RE schedule aggregation and enhanced forecasting models.
Hence, the Hon'ble Commission is suggested to allow the tolerance bands can tightened incrementally over 3-5 years, allowing RE generators to adept to the changes without sudden financial burdens.
However, Simultaneous introduction of "X" factor and tightening of error band shall have very high adverse impact on the DSM charges of the RE generators.
The step-by-step approach would provide opportunity for RE Generators to take efforts to improve the scheduling accuracy over a period. Simultaneous introduction of "X" factor and tightening of error band would be perceived by the RE generators as punishment and the purpose of introduction of DSM regime</td></tr>
<tr><td>2.2</td><td>For the period for 01.04.2026 Onwards:
<table>
<tr><th>WS Seller</th><th>From 01.04.2026 Onwards</th></tr>
<tr><td>For Solar or Hybrid (wind solar) generating stations</td><td>VLwS (1) = Deviation up to 5% DWS
VLwS (2) = Deviation beyond 5% DWS and up to 10% DWS</td></tr>
<tr><td>For Wind Generating Stations</td><td>VLwS (1) = Deviation up to 10% DWS
VLwS (2) = Deviation beyond 10% DWS and up to 15% DWS</td></tr>
</table></td></tr>
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#	Provisions in CERC DSM Regulations, 2024	CERC Proposal 9/SM/2025	Stakeholder's Comments
			would be defeated. • It may be noted that for improving the deviation management two aspects are important. Viz (a) improving forecasting and scheduling discipline and (b) controlling the deviations. As regards VRE generators, these WS Generators do not have control over output to manage deviations and hence are treated as MUST RUN status under IEGC 2023. Only way, the VRE generators can control deviations is by way of improving F&S accuracy and revising the schedule generation. • For revision in schedules, the weather pattern and weather data from meteorological stations are not available with granularity & frequency and communication network also require strengthening. • Recently, the Central Electricity Authority (CEA) mandated the installation of Automatic Weather Stations (AWS) at every wind farm substation, with a requirement to share weather data with the National Centre for Medium Range Weather Forecasting (NCMRWF), New Delhi. This initiative aims to enhance the accuracy of weather forecasts by providing high-resolution, site-specific

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			meteorological data. Concurrently, the wind energy sector is actively leveraging advanced technologies such as Artificial Intelligence (AI) and Deep Learning (DL) to improve forecasting models. These efforts are expected to significantly enhance the precision of wind power forecasting over the next five years. • Hence, until these infrastructure and ecosystem issues are addressed, expecting dramatic improvements in F&S accuracy through tightening of Error Bands is not desirable and counter-productive. The RE developers would tend to over-schedule to avoid losses in over-injections and system operators would need to invest in reserves to cater to shortfall in generation. • **Hence, we urge the Hon'ble Commission to defer the tightening of Error Band by at least 5 years and may introduce phased wise tightening for Existing and New Wind projects for the period from 01.04.2031 onwards.**
3	**Regulation 8(4): Charges of Deviation for WS Sellers**		
3.1	"*8*	• All existing wind and solar projects shall be treated at par with General Sellers from 01.04.2031 onwards.	• In accordance with clause 4 of Regulation 8, the Hon'ble Commission has linked the **charges of deviation**

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<td>(4) Charges for Deviation, in respect of a WS Seller, including such generating stations aggregated at a pooling station through QCA shall be without any linkage to grid frequency, as under:
<table>
<tr><th>Deviation by way of Over injection (Receivable by the Seller)</th><th>Deviation by way of Under Injection (Payable by the Seller)</th></tr>
<tr><td>(i) for VLwS (1) @ contract rate;</td><td>iv) for VLwS (1) @ contract rate;</td></tr>
<tr><td>(ii) for VLwS (2) @ 90% of contract rate</td><td>(v) for VLwS (2) @ 110% of contract rate;</td></tr>
<tr><td>(iii) beyond VLwS (2) @ Zero;</td><td>(vi) beyond VLwS(2) @ 200% of contract rate'</td></tr>
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All new wind and solar projects, with tendering or bid submission dates on or after 01.04.2026, shall be treated at par with General Sellers.
Further, to address the growing concerns regarding grid stability, no payment shall be made applicable to the existing wind and solar sellers for any over-injections during periods when the system frequency is at or above 50.05 Hz.

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with the PPA rate or Contract rate for new as well as existing wind and solar projects. However, in petition No. 9/SM/2025, the Hon'ble Commission has proposed that all existing wind and solar projects shall be treated at par with General Sellers from 01.04.2031 Onwards and new projects on or after 01.04.2026.

It is pertinent to note that if the WS sellers shall be treated at par with general sellers, the deviation settlement would no longer be based on the project specific PPA rate but on the prevailing DSM rate applicable to the conventional generators.
At the outset, treating WS sellers on par with General Sellers (like thermal generators) is not fair and technically inappropriate on following grounds: (a) VRE generator output is linked to nature dependent factors such as wind speed/direction/elevation and insolation/cloud cover, etc. unlike thermal generators where output is controllable through governor control actions. (b) the tariff structure for thermal generators is two part with fixed part secured through availability declarations whereas for RE generators entire tariff is single part and entire revenue stream is linked to generation

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#	Provisions in CERC DSM Regulations, 2024	CERC Proposal 9/SM/2025	Stakeholder's Comments
			yield. • **Thus, impact of deviation charges on revenue stream for thermal generators and that for VRE generators is vastly different. Hence, treating WS sellers on par with General Sellers is not only unfair but discriminatory.** • As RE sources specifically wind and solar are inherently variable in nature because their output depends on weather pattern or seasonal variations, making them less predictable and less controllable than conventional sources like coal, gas, etc. This variability leads to several challenges for grid operators, including frequent forecast errors and sudden changes in RE generation output, which can significantly impact grid reliability, if not managed with the appropriate reserves and flexible resources. • Hence, accurate forecasting and scheduling for RE generation is difficult because of this variability and uncertainty. Even with advanced forecasting tools, deviations from the forecasted schedule can be significant. The forecasting error are common in wind and solar projects, arising from sudden changes in weather pattern such

#	Provisions in CERC DSM Regulations, 2024	CERC Proposal 9/SM/2025	Stakeholder's Comments
			as wind speed variations or cloud cover. • This will allow the RE generator to deviate from its schedule and significantly lead to increase in the deviation quantum. However, If WS sellers shall be treated similarly to the conventional generators, their financial risk increases. • They may face higher DSM penalties due to their less generation output, greater deviation quantum and prevailing DSM rates applicable to general sellers. Since RE generators cannot quickly respond or adjust their output like conventional generators, this leads to significant revenue loss and potentially discourages the investment for new RE projects. • Accordingly, this will not serve the purpose of the IEGC 2023 and CERC DSM Regulations, 2024 which state that all entities adhere strictly to their schedule. • **Hence, the Hon'ble Commission is requested to reconsider the proposal that WS sellers shall be treated at par with the General Sellers.** • Further, based on the sample calculations for few wind project sites, it has been observed that the expected

#	Provisions in CERC DSM Regulations, 2024	CERC Proposal 9/SM/2025	Stakeholder's Comments
			DSM charges can **increase approximately by 0.5% due to proposed no-payment against over-injection** during the period when frequency is above 50.05 Hz**.** • **Hence, the Hon'ble Commission is requested to reconsider the same.**
4	**Regulation 8(4): Aggregation of WS Sellers at Pooling Station Through QCAs**		
4.1	**Clause (4) of Regulation 8** ***"8*** ***(4) ……..*** *Note-2: In case of aggregation of WS sellers at a pooling station through QCA,* *(a) the contract rate for the purpose of deviation shall be equal to the weighted average of the contract rates of all individual WS seller(s) opting for aggregation at the pooling station;* *(b) Available Capacity shall be equal to the cumulative capacity rating of wind turbines or solar inverters that are capable of generating power in a given time block;* *(c) de-pooling of deviation charges for WS seller(s) connected to the pooling station shall be as per the methodology mutually agreed upon between the QCA and such individual WS seller(s)."*	• The Commission has carried out the analysis by assuming aggregation of WS sellers at a pooling station through Qualified Coordinating Agency (QCA) with different values of X%. • The Commission has observed with aggregation of WS sellers at a pooling station, the impact of DSM charges reduces significantly. • **For Wind Projects aggregated at a pooling station in the Northern Region** (For the period of 16.09.24 to 29.06.25), the reduction in DSM charges payable by WS sellers at a pool account is significantly reduced by 19.95% when X=100% to 8.30%, when X=0%. • Hence, the study assessed when the schedules and actual injection of multiple RE generators are combined, the overall deviation is reduced, leading to a lower revenue impact and helps to offset the individual generation fluctuations. • Further, the Commission has reflected on the need for improving the forecasting techniques, which could be deployed in the larger interest of grid security. This is because a large tolerance band, coupled with a relaxed error/deviation formula for WS sellers, would have a	• The analysis carried out by the Commission, assuming aggregation of WS sellers at one pooling station through Qualified Coordinating Agency (QCA), clearly demonstrates a substantial reduction in DSM charges. • By combining actual injection and schedule across multiple RE projects, the aggregation smooths out fluctuations caused by unpredictable weather patterns and enhances the scheduling accuracy, which ultimately leads to lower deviation charges and reduction in revenue loss. This will encourage the RE developers for further investments and improves the overall feasibility of the RE projects. • Hence, the Hon'ble commission is requested to facilitate the aggregation through QCAs as a best practice within the DSM Framework. • Further, there is no risk reward sharing

#	Provisions in CERC DSM Regulations, 2024	CERC Proposal 9/SM/2025	Stakeholder's Comments
		serious impact on grid management.	mechanisms with QCAs as of now. Financial risks are totally shifted to RE Developers. **Hence, it is suggested to the Hon'ble Commission that the contract of RE Developers with QCA should include performance-based risk-reward sharing mechanisms.**
5	**Revision of Schedule by WS Sellers**		
5.1	No Provision	Not Specified	• The RE generation is highly sensitive to weather pattern changes, but in particular, wind power generation is facing significant challenges due to highly variable and unpredictable nature of wind patterns, which leads to abrupt and substantial change in predicted generation output. These fluctuations, often occurring within minutes, result in deviations from scheduled generation and consequently attract heavy penalties under the current DSM framework. • It must be noted that although regulations allow up to 16 schedule revisions per day, each revision only becomes effective after a delay of 45 minutes, which is way too high to counter the impact of change in wind patterns. Further as per Regulation 49 (4) (c) of IEGC, 2023 any revision in schedule made in odd time blocks shall become effective from 7th time block

#	Provisions in CERC DSM Regulations, 2024	CERC Proposal 9/SM/2025	Stakeholder's Comments
			and any revision in schedule made in even time blocks shall become effective from 8th time block. • There is sufficient lead time taken for the submission of the revision in schedule. This delay means that real time changes in wind output due to sudden change in wind speed cannot be immediately reflected in the schedule. Even with good forecasting tools, sudden changes in wind patterns are hard to predict. Since revisions take time to apply, the generator may continue to be penalized for under-generation during this window. **This renders generators practically helpless in managing deviations despite the availability of forecasting tools and operational readiness.** • Further, as per Regulation 49 (4) (c) of IEGC, 2023, the revisions in schedule are reflected only after 6 subsequent time blocks, because of which wind generators can't immediately adjust their schedules when sudden changes in wind pattern reduces their output. • As a result, generators may still face penalties, even if the forecast is accurate. Furthermore, many State regulations only allow schedule changes up to 1.5 hours in advance

#	Provisions in CERC DSM Regulations, 2024	CERC Proposal 9/SM/2025	Stakeholder's Comments
			(equivalent to 6-time blocks), which isn't enough to respond to sudden changes in weather pattern. This leaves generators with little control over managing deviations, even if they have accurate forecasting tools and are operationally prepared. • **Thus, the Hon'ble Commission is suggested to allow wind generators to revise their schedule within a 15-minute window from a weather event trigger (e.g., sudden wind speed change, wind direction change), subject to validation by telemetry/Satellite/Radiation Data by SLDC/RLDC.**
6	**Role of REMCs in Forecasting & Scheduling of WS Sellers**		
6.1	No Provision	Not Specified	• Currently, there is no coordinating agency between the RE generators / QCAs and NLDC/RLDCs/SLDCs who can manage the actual RE generation data & predict the abrupt changes in weather pattern such as changes in wind speed, cloud cover etc. • **Renewable Energy Management Centers (REMCs)** can fulfill this critical role by providing centralized forecasting, scheduling, and continuous monitoring of wind and solar generation. Co-located SLDCs and RLDCs, these centers leverage

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			advanced Artificial Intelligence-based forecasting tools to provide highly accurate short-term (15-minute intervals), day-ahead, intraday, and week-ahead predictions of renewable generation at the pooling station, state, and national levels. • REMCs enhance grid reliability by real-time tracking of renewable generation through SCADA systems and integrating data from multiple forecasting service providers and weather information. This enables RLDCs and NLDC to optimize scheduling and grid operations, minimizing deviations and improving the stability of the power system. By acting as a centralized coordination and information repository, REMCs address the uncertainty and variability issues inherent in renewable energy sources, such as abrupt changes in wind speed or cloud cover. • **Hence, the Hon'ble Commission is requested to take efforts such that the effectiveness of REMCs be further strengthened to support RLDCs and NLDC in developing optimized schedules and robust forecasts.** • Additionally, NLDC/RLDCs should

#	Provisions in CERC DSM Regulations, 2024	CERC Proposal 9/SM/2025	Stakeholder's Comments
			analyze and validate the accuracy of forecasting data supplied by REMCs to ensure reliable scheduling for state and regional grids. **This validation process is essential as it establishes a benchmark for forecasting accuracy and highlights whether RE developers and QCAs can realistically exceed the predictive capabilities of REMCs.** Improving REMC capabilities and leveraging their insights will be crucial for better integration of renewable energy, minimizing DSM penalties and enhancing overall grid reliability.