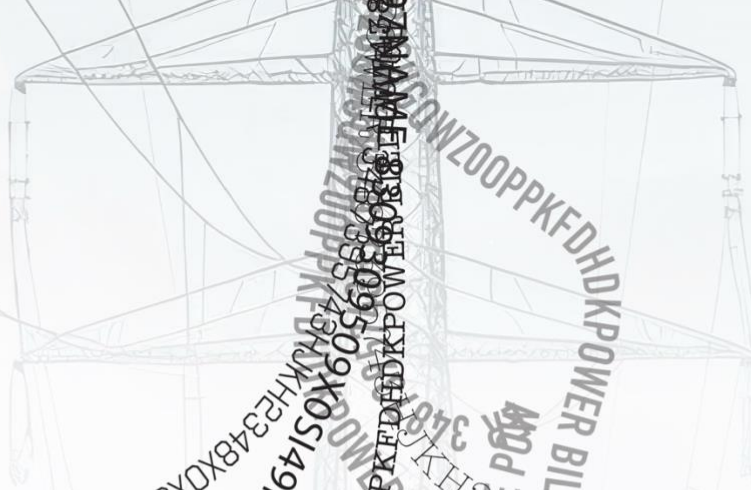
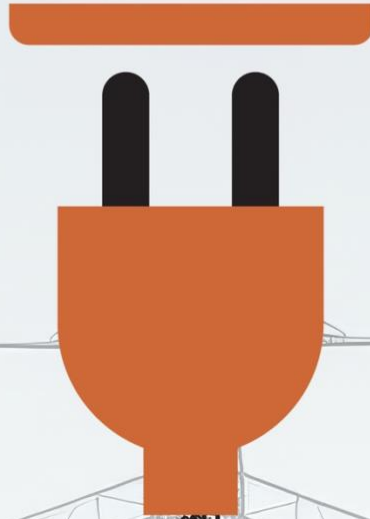


Submission to Ministry of Power | July 2026

SUBMISSION ON MOP'S DRAFT NATIONAL ELECTRICITY DATA SHARING FRAMEWORK, 2026



CENTRE FOR ENERGY, ENVIRONMENT & PEOPLE

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1. Introduction

The Ministry of Power issued a notice on 22nd June 2026, wherein it published the Draft National Electricity Data Sharing Framework, 2026, which provides broad principles and institutional structures to enable structured, secure, and transparent data sharing in the electricity sector. The Ministry had also invited comments and/or suggestions on the Framework.

This is a submission from the Centre for Energy, Environment and People (Jaipur, Rajasthan) in response to the Ministry's invitation. The submissions have been structured as follows:

- a. General Comments
- b. Section-wise Comments

We therefore request that these submissions be taken on record. We further request the opportunity to make our submissions at any public hearing held by the Ministry on this proposed framework.

2. General Comments Power Sector Reforms

2.1. Rationale for the need for a new portal was not provided

The Preamble of the draft framework accurately observes that electricity sector data in India remains fragmented, lacks standardised formatting, and lacks a unified access architecture. To remedy this, the framework proposes a completely new institutional layer consisting of the National Electricity Data Centre (NEDC) and the National Electricity Data Portal (NEDP).

India's power sector is already supported by several highly sophisticated, federally integrated, and operational data systems. Prominent existing platforms include:

- **National Power Portal (NPP):** A centralised, daily operational reporting platform acting as the single point of interface for generation, transmission, and distribution data across India, anchored by the CEA.
- **India Climate & Energy Dashboard (ICED):** Developed by NITI Aayog, which already synthesises complex, multi-sector energy metrics into public-facing datasets.
- **CEA's Data:** Various monthly/annual statistical reporting mechanisms (usually in PDF formats)
- **Other platforms,** such as Vidyut Pravah, MERIT India, and PRAAPTI.

Section 10 of the draft framework acknowledges that implementing this infrastructure will require significant expenditure from regulated utilities/data issuers, proposing that State Electricity Regulatory Commissions (SERCs) allow these costs as a "passthrough in Annual Revenue Requirement (ARR) after prudence checks."

Mandating or incentivising duplicate infrastructure at both the central and utility levels will ultimately burden the end-consumer through inflated ARR. Rather than addressing fragmentation, introducing a separate NEDC/NEDP framework alongside active statutory

pipelines (such as the NPP) risks creating a parallel data silo, which may lead to conflicting data versions and duplicate reporting requirements for utilities.

We therefore recommend, instead of building a new digital architecture from the ground up, that the Ministry of Power evaluate and adopt an "Integration-First" approach. The core objectives of the framework, namely metadata standardisation, de-identification protocols (Clause 6.3), and API interoperability, can be seamlessly achieved by upgrading, expanding, and legally empowering the existing infrastructure. This avoids gold-plating utility assets, prevents administrative duplication, and shields end-consumers from avoidable costs.

2.2. Overlapping features of the framework with existing data-sharing mandates

While the thought of unifying the entire electricity sector data is a welcome step, the framework for the portal must be carefully harmonised with existing statutory disclosure mandates to prevent regulatory duplication or unintentional restrictions on data that is already legally public.

Currently, the sector operates under disclosure rules where operational data is governed by *Sections 28 and 32 of the Electricity Act, 2003* and the *CERC (Indian Electricity Grid Code) Regulations, 2023*, which mandate real-time operational data architectures via LDCs. On similar lines, commercial data disclosures are governed by *SERC Multi-Year Tariff (MYT) Regulations*, requiring granular financial and asset disclosures via public-domain petitions.

To ensure the framework succeeds, it must explicitly state that its data classification tiers (Public vs. Access Controlled) "cannot be used to override or restrict" data disclosures that are already mandated as public by Central or State Commissions. For instance, if a dataset is classified as *Access Controlled (Tier 2)* under the new framework, but is already mandated as *Publicly Accessible* under existing SERC Tariff filing or Grid Code regulations, it could create compliance contradictions. The framework should serve as a convergent portal to discover these existing data streams, rather than an independent gatekeeping layer that inadvertently overrides established regulatory transparency.

2.3. Ambiguity in public accessibility for viewing purposes

Clause 5.1.3 (a) states that the public classified data may be available free of cost for "viewing purposes". The proposed clause creates ambiguity and leaves a significant grey area for citizens who need to download public data for analysis and use in the public interest, rather than merely viewing it. An open data framework is intended to promote innovation, research, and informed analysis, ultimately serving the public interest by enabling greater transparency and fostering accountability initiatives. To achieve the true machine-readability intended by the framework, the public must have the right to download these datasets (e.g., in XLSX, CSV, JSON, or PDF formats) without financial barriers.

It is therefore recommended that *Clause 5.1.3(a)* be amended to explicitly state that all datasets classified as Tier 1: Public shall be available for "both viewing and downloading free of cost" in standardised, machine-readable formats.

3. Section-wise Comments on the Draft Framework

3.1. Machine-readable data not included as a data issue (2.2)

Under the proposed *Section 2.2*, the draft framework defines various *Data Issues Today*, comprising four major issues in data sharing currently faced across the sector: inconsistent metadata, differing definitions, no standard dataset classification, and limited visibility for stakeholders. While these points highlight most of the issues in data sharing and transparency, they don't effectively mention data format issues that most stakeholders face due to the negligence on the part of the utilities. The utilities still provide portions of data in scanned PDF format, which is machine-unreadable, often user-unreadable, and sometimes totally smudged and blurred. This not only violates existing compliance mandates but also impedes the user's ability to read, let alone study and analyse the dataset for any meaningful purposes.

Although the framework discusses the format and machine-readability in *Sections 7.2, clause (e)*, and *7.6, clause (b)*, the repercussions of this problem are so detrimental that they warrant inclusion as a main highlight of issues at the beginning, in the *Issues and Objectives* section.

A few samples:

Figure 1: Rajasthan ARR FY26 Formats provided in scanned, unreadable format

3.2. Grievance Redressal Mechanism

Under the proposed *Section 5, Clause 5.3, Grievance Redressal Mechanism*, the draft outlines a two-step process to address grievances and ensure transparency and fairness in data access governance. The prescribed framework comprises two levels of authority. The grievances will initially be handled and reviewed at level 1 by the Data Governance Officer (DGO). If the data requester is unsatisfied with the decision, they can escalate the matter to level 2, which is one level above DGO and is called appellate review in clause 5.3. After a decision at level 2, if the data requester is dissatisfied, they have the right to approach any court of competent jurisdiction or a statutory authority.

The electricity sector already has well-established institutional mechanisms and Regulatory Commissions that possess the technical and sector-specific expertise necessary to adjudicate complex disputes relating to data access and sharing. Explicitly allowing data requesters to approach the appropriate existing mechanism for unresolved grievances would enable disputes to be resolved in a timely, efficient, and informed manner. Also, explicitly mentioning the role of the commission in the oversight of the grievance redressal mechanism would ensure institutional consistency and leverage the existing regulatory architecture. Accordingly, it is recommended that the framework explicitly provide for recourse before the existing institutional mechanism, prior to requiring parties to escalate disputes to civil courts.

3.3. Classification Matrix and criteria

3.3.1. Individual access to access-controlled data

Section 6 of the proposed framework focuses on data classification, which classifies data into two tiers: Public and Access Controlled. *Clause 6.1, Classification Matrix* provides insights into both the tier, entailing description of data, accessibility and indicative examples. Although the matrix highlights different aspects of classification, it does not mention whether access-controlled data can be requested by the general public/individual. Furthermore, the second matrix table clearly admits “Any registered Indian entity” as the only eligible data requester for access-controlled data. In the subsequent lines, the public has no API/Secure data environment access, as clearly stated in the second table of the classification matrix. Similarly, in *Clause 7.5 (b)*, the draft proposes that any individual affiliated with any institution/organisation can register on portal for access-controlled data, which again reaffirms the unavailability of access-controlled data to public/individuals who are not affiliated with any institution/organisation.

Hence, it is recommended that the matrix be reviewed and refined to ensure that access rights and enabling mechanisms are available to any individual seeking to obtain data, regardless of whether they are affiliated with an organisation.

3.3.2. Classification criteria decision

Clause 6.2, Criteria for Classification, proposes that principles for data classification criteria will be given by National Electricity Data Centre (NEDC), which data issuers may use to classify all datasets. At the same time, in clause 8, *Electricity Data Reference Model and Format*, the

draft proposes that Central Electricity Authority (CEA) will be responsible for formulating the data structure and format of the datasets. NEDC, as defined in section 5, is the centre for maintaining the National Electricity Data Portal for public dataset publication and discovery. Whereas CEA is a statutory body operating under the MoP that formulates power development plans and enforces technical and safety standards for the nation's grid. Accordingly, this puts CEA in a better position to draft classification principles, which already has all the required data access and is better informed. This will simplify and streamline the entire process and structure.

We hereby recommend appointing CEA to draft the classification criteria and principles, along with its already-proposed function of formulating the data structure and formats of the datasets, to keep the process simple and effective.

3.3.3. Data issuer's accountability

Section 6 clearly states that the classification framework applies only to data designated as shareable by the data issuer. This is a critical function of the data issuer, along with other responsibilities mentioned separately in clause 5.1. This clause specifically gives the data issuer the power to identify shareable data and designate data that the data issuer considers unshareable. The proposed framework also discusses how the classification of data into public and access-controlled categories can be determined based on the principles of classification criteria set by NEDC, as we highlighted in our preceding comment.

This implies that *Section 6* limits the entire classification framework only to data that has already been “*designated as shareable by the data issuer.*” Allowing data issuers unrestricted discretion to designate data as non-shareable may result in significant inconsistencies across utilities and reduce transparency in the classification process. This shall allow utilities to circumvent the framework entirely by withholding high-utility datasets without any regulatory recourse. The primary objective of this framework is to foster a transparent, non-discriminatory data-sharing ecosystem. Allowing unilateral, unguided pre-seclusion of data defeats this purpose and risks preserving the very data fragmentation the preamble seeks to resolve.

The unilateral power of the data issuer under *Section 6 and Clause 5.1* to designate datasets as non-shareable should be subjected to mandatory oversight. To ensure accountability, any decision by a data issuer to withhold data or designate it as non-shareable must be approved by the appropriate State Electricity Regulatory Commission through a formal petition process, featuring a mandatory period for public notice and stakeholder comments. The Commission may also specify certain categories of data that shall be made publicly available on a mandatory basis to ensure consistency in data disclosure practices.

3.4. No rationale for classification

The proposed draft lists five elements as metadata requirements in clause 7.3, which every data issuer must discover and publish for each dataset on the digital portal. The last element (*e*) *classification* must be provided by the data issuer to indicate whether the dataset is public

or access-controlled, in accordance with the approved data classification framework. While this is an important element, and the draft rightfully mentions including it in the metadata list, it does not require the data issuer to provide a rationale for excluding data from public classification or for classifying the data as access controlled.

Requiring a written rationale for access control prevents arbitrary classifications and fosters transparency. It reassures stakeholders that data is restricted only when strictly necessary (e.g., due to privacy, commercial confidentiality, or grid security concerns). When data requesters understand *why* a dataset is access-controlled, they can better align their registration, KYC, and security protocols to satisfy the data issuer's specific compliance concerns, leading to smoother data-sharing workflows.

It is recommended that *Clause 7.3(e) Classification* be amended to require the data issuer to provide a brief, clear rationale or justification whenever a dataset is classified as Tier 2: Access Controlled (or excluded from the Tier 1: Public domain).