Name of the person/entity proposing comments	Indian Association of Investment Professionals (CFA Society India) Key Contributors : Satpal Saini, Anil Ghelani, Manish Jha, Digant Mittal, Namit Arora, Ashish Kela, Biswarup Mohapatra
Category (Listed Entity / MII / Market Intermediary / Professional / Investor /	Association of Investment Professionals
Email id	advocacy@iaipirc.org
Contact no.	91 8080565484 Shreenivas Kunte, CFA, CIPM, PHD

Sr. No.	Proposal	Confirmity to Proposal	Comments	Rationale
1	Whether Option 1 (Blended VWAP - Para 3.4) is the preferred methodology for determining the settlement price of both index and stock derivatives contractson the expiry day?	Strongly Agree	**We support Option 1 – Blended VWAP:**	Rationale: We support Option 1 – Blended VWAP as the preferred methodology for determining the settlement price of both index and stock derivatives on the expiry day. The proposed approach provides a broader and more representative measure of price discovery by incorporating actual transactions executed during both the last 30 minutes of the Continuous Trading Session (CTS) and the 10-minute Closing Auction Session (CAS).
			1. More representative price discovery: Option 1 incorporates actual transactions from both the last 30 minutes of the Continuous Trading Session (CTS) and the 10-minute Closing Auction Session (CAS), thereby providing a broader representation of market activity on expiry day.	A key advantage of the proposed methodology is that it does not prescribe a fixed or predetermined weight to CTS or CAS. Instead, the relative contribution of each session is determined by the actual traded value during the respective periods. This allows the settlement price to dynamically reflect the level of trading activity in each session and avoids an arbitrary allocation of weight between CTS and CAS.
			2. Market-driven rather than predetermined weighting: The relative contribution of CTS and CAS is determined by the actual traded value during the respective periods, without assigning any fixed or predetermined weight. This allows the settlement price to reflect the actual distribution of trading activity on each expiry day.	Further, incorporating CAS transactions ensures that price discovery occurring during the closing auction is appropriately reflected in the derivatives settlement price. This is particularly relevant as the market structure now includes CAS as an integral part of the closing process. Excluding CAS transactions entirely from the settlement methodology could result in the settlement price being based only on the preceding continuous trading period, despite meaningful price discovery potentially occurring during the closing auction.
			3. Avoids over-reliance on either session: By incorporating both CTS and CAS transactions, the methodology avoids relying exclusively on one price-discovery mechanism. The impact of each session naturally varies depending on the actual trading activity during that period.	At the same time, retaining CTS transactions ensures that the settlement price is not determined solely by the outcome of the closing auction. The blended approach therefore provides a balance between continuous and auction-based price discovery and captures a wider set of actual market transactions during the closing period.
			4. Better captures the transition to CAS: Since CAS has been introduced as part of the closing market structure, including CAS transactions in the derivatives settlement methodology helps maintain consistency between cash-market price discovery and the settlement methodology for derivatives.	The methodology also provides greater flexibility across different expiry days, as the contribution of CTS and CAS will vary according to actual traded value rather than remaining fixed. This makes the settlement methodology responsive to prevailing market activity and avoids the need to determine an appropriate fixed CTS-CAS weighting in advance.
			5. Particularly relevant given the concentration of trading activity near expiry: Significant derivatives activity has historically been concentrated toward the end of the trading day. A methodology that considers both CTS and CAS can therefore capture price discovery across this closing period rather than restricting settlement exclusively to one segment of the closing process.	Accordingly, we believe Option 1 offers a more comprehensive, objective and market-driven basis for settlement. It captures price discovery across both CTS and CAS, allows the relative contribution of each session to be determined by actual market activity, and provides better alignment between the cash-market closing mechanism and derivatives settlement. We therefore recommend adoption of Option 1 as the preferred methodology for both index and stock derivatives.
			6. Dynamic weighting provides flexibility: Unlike a fixed CTS/CAS allocation, the proposed approach allows the relative contribution of the two sessions to change based on actual traded value. This makes the methodology responsive to the market activity prevailing on a particular expiry day. recognised this as an important feature of the proposal.	-
			7. **Option 1 is preferable to Option 2 as the long-term methodology:** While Option 2 provides a simpler CTS-only approach, Option 1 offers a more comprehensive framework by incorporating both CTS and CAS. The consultation discussion broadly converged on Option 1 as the preferred methodology.	-
			8.**Particularly important on index rebalancing days:** On days involving significant index rebalancing, closing-period activity can be substantial and prices may reflect large institutional flows. Incorporating CAS transactions allows such genuine closing-period price discovery to be captured in the settlement price.	-
2	Whether Option 2 (CTS VWAP - Para 3.5) is the preferred methodology for determining the settlement price of both index and stock derivatives contracts on the expiry day, before ultimately transitioning to Option 1 in the long term?	Not Agree	-	-
3	Do you agree with the proposal that IEP - derived Indicative Index Value during CAS should not be disseminated, while continuing to disseminate individual security-level IEPS?	Strongly Agree	We support the proposal to discontinue dissemination of the IEP-derived Indicative Index Value (IIV) during CAS while continuing to disseminate security-level IEPs. Since the IIV is derived from evolving, unexecuted IEPs of constituent securities, it may be interpreted as an actual index level despite not representing executed transactions. This could potentially lead to misinterpretation and inappropriate trading or risk-management decisions. **Retaining security-level IEPs would continue to provide useful information on the auction price discovery process, while avoiding the potential confusion associated with an indicative index-level value.**	The IEP-derived IIV is an indicative and evolving value, calculated from the IEPs of constituent securities, and does not represent an actual traded index level. Its continuous dissemination may therefore create a misleading impression of actual price discovery and potentially influence trading or hedging decisions based on a level that has not been executed. At the same time, retaining security-level IEPs ensures that participants continue to receive relevant information on the ongoing auction price discovery process.
4	Whether Option A - CTS for CAS Stocks till 3:30 and F&O till 3:45 is the preferred market timing?	Strongly Agree	We support Proposal 4 – CTS for CAS stocks till 3:30 PM and F&O trading till 3:45 PM. The proposed sequencing provides a clear transition from continuous trading to CAS-based price discovery, with CTS ending at 3:30 PM, CAS concluding at approximately 3:40 PM, and a further five-minute window for derivatives trading until 3:45 PM. This post-CAS window provides participants an opportunity to manage, hedge or square off positions after the underlying price discovery is completed. The 3:30 PM CTS close also aligns with the proposed settlement methodology based on the last 30 minutes of CTS. Overall, the proposed timing provides a more orderly linkage between CTS, CAS price discovery and subsequent derivatives position management.	Proposal 4 provides better alignment between CTS, CAS and derivatives trading, while retaining the 30-minute CTS window relevant for the proposed settlement methodology. The five-minute post-CAS F&O window also provides participants sufficient time to manage, hedge or square off positions following completion of underlying price discovery.
5	Whether Option B - CTS for CAS Stocks till 3:15 and F&O till 3:30 is the preffered market timing?	Not Agree	-	-
6	Do you agree with the proposal to prohibit cancellation of limit orders placed beyond +_1% of the Reference Price during CAS, while permitting only price-improving modifications to such orders?	Strongly Agree	-	-
7	Do you agree with the proposal that the pending quantity of an unexecuted Iceberg order at the end of CTS, should be converted into a normal limit order for participation in CAS, with the entire pending quantity disclosed in CAS order book?	Strongly Agree	-	-