

Ref: CERC/Ayana/DSM- 01/20211022

The Concerned officer
Central Electricity Regulatory Commission
3rd & 4th Floor, Chanderlok Building,
36, Janpath, New Delhi- 110001

Email: advisor-re@cercind.gov.in ; secy@cercind.gov.in

Subject: - Comments on CERC Draft Regulation (Terms and Conditions for Renewable Energy Certificates for Renewable Energy generation), 2022

Sir,

This is with reference to PUBLIC NOTICE dated 15th February 2022, where the Draft Regulation on Renewable Energy Certificates for Renewable Energy generation, 2022. was uploaded on the website of CERC. Pls find attached Comments on the Draft Regulation for your kind reference.

We are looking forward for your co-operation.

For M/s AYANA RENEWABLE POWER PRIVATE LIMITED



Authorized Signatory

Ayana Renewable Power Private Limited

Registered & Corporate Office:

S2904, World Trade Centre, Brigade Gateway Campus, 26/1, Dr. Rajkumar Road, Bangalore – 560055, Karnataka.

CIN: U40106KA2017PTC101000

Tel: +91 080-48511001 email: sharatranjan@ayanapower.com website: www.ayanapower.com

Suggestions / Terms and Conditions for Renewable Energy Certificates for Renewable Energy generation), 2022

Draft Clause	Comment/Suggestion
6. Grant of Accreditation for Certificates- Accreditation for Certificates to the eligible entities connected to intra-State transmission system shall be granted by the State Agency.	The state Agency should be directed to have an online portal like Central level registry to register the project for REC
9. Revocation of Registration The Central Agency, after making an enquiry and giving notice may revoke, recording reasons for such revocation, registration granted to an eligible entity referred to in clause (1) of Regulation 8 of these regulations in case the eligible entity breaches any of the terms and conditions of its registration, the breach of which is expressly declared by such registration to render it liable to revocation.	The notice period of at least 30 days should be defined in the Regulation so that the Generating company can demonstrate and give the suitable supporting documents in favor of its support
10(2) Issuance of Certificates Application for issuance of Certificates shall be made to the Central Agency within six months from the corresponding generation by the eligible entity:	The application period should be extended to 12 months instead of six months from the corresponding generation by the eligible entity. State agencies takes lot of time in processing the application
12 (2) Certificate Multiplier for Hydro as 1.5	Hon'ble commission is requested to clarify if it is applicable to all Hydro projects greater than 25 MW capacity.
8 (2) Provided that the registration for Certificates granted under the REC Regulations, 2010 and deemed to have been granted registration for Certificates under these regulations shall be valid for a period of 15 years from the date of deemed registration for such Certificate.	The validity of the certificate should be upto 25 years instead of 15 years as the Renewable Energy projects have life period of 25 years.

Ayana Renewable Power Private Limited

Registered & Corporate Office:

S2904, World Trade Centre, Brigade Gateway Campus, 26/1, Dr. Rajkumar Road, Bangalore – 560055, Karnataka.

CIN: U40106KA2017PTC101000

Tel: +91 080-48511001 email: sharatranjan@ayanapower.com website: www.ayanapower.com