



**Mytrah Energy (India) Private Limited**  
(Formerly known as Mytrah Energy (India) Limited)  
(CIN : U40108TG2009PTC065904)  
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**To**  
**The Central Electricity Regulatory Commission**  
**3<sup>rd</sup> & 4<sup>th</sup> Floor, Chanderlok Building,**  
**36, Janpath, New Delhi- 110001.**

**Date: 24- March- 2022**

**Subject: Suggestions/Comments on “Draft Central Electricity Regulatory Commission (Terms and Conditions for Renewable Energy Certificates for Renewable Energy Generation) Regulations, 2022”- Reg.**

Dear Sir,

At the onset, we would like to introduce ourselves as Mytrah Energy (India) Pvt Ltd, a company based in Hyderabad and is one of the largest Independent Power Producers ('IPP') in renewable energy in India. We already have presence in Andhra Pradesh, Gujarat, Karnataka, Rajasthan, Maharashtra, Madhya Pradesh, Telangana and Tamil Nadu with commissioned wind capacity of 1329 MW. We also extended business segment into solar by winning 422MW of solar in three states Telangana, Punjab and Karnataka, PPA signed, and the entire capacity is successfully commissioned.

We would like to thank CERC, for providing opportunity to submit our suggestions on “**Draft Central Electricity Regulatory Commission (Terms and Conditions for Renewable Energy Certificates for Renewable Energy Generation ) Regulations, 2022**”.

We hereby submitting our views for your kind consideration

**Yours sincerely,**

  


**For Mytrah Energy (India) Private Limited**

**Mytrah’s Suggestions/Comments on “Draft Central Electricity Regulatory Commission (Terms and Conditions for Renewable Energy Certificates for Renewable Energy Generation) Regulations, 2022”.**



**Mytrah’s Suggestions/ Comments on “Draft Central Electricity Regulatory Commission (Terms and Conditions for Renewable Energy Certificates for Renewable Energy Generation) Regulations, 2022” are as follows:**

| Sr. No. | Clause No.       | Existing Clause  | Suggestion/Comment /Modified Clause   | Rationale  |
|---------|------------------|--|---|--|
| 1       | <b>Clause 4:</b> | <p><b>4. Eligibility for Issuance of Certificates</b></p> <p>2(b) such renewable energy generating station has not availed any (iii) facility of banking of electricity.</p> | <p>RE facility which avails banking shall be considered to apply for REC.</p> | <p>It should be noted that most RE projects have significant intra-day and seasonal variation in generation. For example, solar projects generate only for 8-10 hours a day and high during Summer season and wind projects generate 60-80% of annual generation during the “high-wind” seasons only.</p> <p>For these reasons, banking facilities are essential for RE projects to be viable.</p> |

|   |           |                         |   |   |
|---|-----------|-------------------------|---|---|
| 2 | Clause 13 | Pricing of Certificates | Commission to set a Floor Price for REC | <p>As The National Tariff Policy, 2016 lays emphasis on the statutory principle that while determining tariff, safeguarding of consumers' interests alongside recovery of the cost of electricity in a reasonable manner shall be ensured.</p> <p>It is undoubtedly clear that the generation from RE sources, in its all forms, being environment friendly, is required to be promoted to their fullest potential.</p> <p>It is also to be noted that the tariff to be recovered by REC mechanism is part of the project cost.</p> <p>So, it is thus duty of the Regulator to ensure the recovery of tariff for the projects who have participated in the REC scheme.</p> <p>Hence, we request the commission to determine the floor price of REC to protect the RE projects and make them financially viable.</p> |
|---|-----------|-------------------------|---|---|

In view of the above cited suggestions, we request your good selves to ensure that the interest of the renewable industry is protected, and Generation of clean energy continues. We look forward to rendering our services with best of our abilities in the renewable sector for all times to come.

Thanking you




For Mytrah Energy (India) Private Limited