



**Shell Energy India Private Limited**

SEIPL/MoP/REC/2022/06

15 March 2022

**Shri Sanoj Kumar Jha,**  
Secretary,  
Central Electricity Regulatory Commission,  
3<sup>rd</sup> & 4<sup>th</sup> Floor, Chanderlok Building, 36, Janpath,  
New Delhi – 110 001

BG House, Lake Boulevard  
Hiranandani Business Park, Powai  
Mumbai - 400 076  
India

Website: [www.shell.in](http://www.shell.in)  
Tel: +91 22 40325321  
Fax: +91 22 40058931

**Subject: Comments on the Draft CERC (Terms and Conditions for Renewable Energy Certificates for Renewable Energy Generation) Regulations, 2022 (the “Draft Regulations”)**

Dear Sir,

This has reference to the public notification No. RA-14026(11)/1/2022-CERC soliciting comments on the Draft Regulations.

Shell is one of the most diversified international energy companies in India with over 9,000 employees and presence across upstream, integrated gas, downstream, renewable energy, and deep capabilities in R&D, digitalization and business operations. Shell Energy India owns and operates an LNG re-gasification terminal at Hazira since 2005 and is a leading gas marketer offering competitive and reliable gas supply to end consumers. Shell also operates fuel retail outlets across eight states - Andhra Pradesh, Assam, Gujarat, Karnataka, Maharashtra, Meghalaya, Tamil Nadu and Telangana. In the renewable energy sector, Shell has investments in renewable companies through Cleantech Solar, Husk Power and Orb Energy.

We welcome the various steps taken by the Ministry in reforming and liberalising the electricity sector over the years including the Draft Regulations. We support the Draft Regulations especially sub regulation 11(2) allowing exchange of renewable energy certificates through electricity traders. The trade of Certificates in bilateral market will allow further innovation to take place in the market such as virtual PPAs, thereby encouraging merchant capacity in the renewable sector and enhancing the role of renewable energy in the electricity mix through market mechanisms.

We would also be available for any open house that the Ministry may conduct on the matter.

Yours sincerely,

**For Shell Energy India Private Limited**

**Nakul Raheja,**  
Director

CIN: U40100GJ2000PTC038780

Registered Office: Office No. 2008, The Address, Westgate - D Block, S. G. Highway, Makarba, Ahmedabad- 380051, India Tel: +91 79 47554100