

No.SBPIL/2021-22/ 2633

14th March, 2022

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

Sub: Regarding Comment/Suggestion on Draft Central Electricity Regulatory Commission (Terms and Conditions for Renewable Energy Certificates for Renewable Energy Generation) Regulations, 2022.

Dear Sir,

On the above cited subject matter we would like to Submit our following Comments/Suggestion for your kind consideration:

- 1) **Eligibility of Issuance of Certificates:** With referance to the draft REC Regulation 2022 the eligibility for issuance of certificate mentioned as Under:
 - a) **(Clause No. 4 (2) (b)) such renewable energy generating station has not availed any (i) waiver or concessional transmission charges or (ii) waiver or concessional wheeling charges or (iii) facility of banking of electricity.**

Our Comment/Suggestion:

As per the above clause no (b), waiver or concessional transmission charges and wheeling charges as well as facility of banking is being offered by State Government time to time so as to promote renewable energy generation within the states, Therefore it should not be the basis of eligibility of REC or else this whole purpose will get defeated, therefore the RE project who are availing the benefit waiver of transmission charge, wheeling charges as well as banking facility should also be eligible for REC.

- b) **(Clause No. 4 (3)) Captive generating stations based on renewable energy sources and meeting the conditions as specified under clause (2) of this Regulation in respect of renewable energy generating stations shall be eligible for issuance of Certificates:**

Provided that the Certificates issued to such captive generating stations to the extent of self consumption, shall not be eligible for sale.

Our Comment/Suggestion:

If any captive power generating station which is exempted for RPO obligation then in that case it must be eligible to sale REC in the market.

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Though by exemption from RPO, captive power generating station is not obliged to generate RE power but since generating station is generating renewable energy thus it should always be promoted otherwise goal of achieving 40% RE power generation will not be achieved.

The captive consumption by RE generation should also be allowed to avail benefits of REC

- 2) **Issuance of Certificates (Clause No. 10 (2)):** Application for issuance of Certificates shall be made to the Central Agency within six months from the corresponding generation by the eligible entity:

Provided that no Certificate shall be issued for applications made beyond the period of Six months from corresponding generation.

Our Comment/Suggestion: There should not be any limit for apply for issuance of Certificate or else it should be minimum 5 Years from the corresponding generation.

Prayer:

- 1) Kindly remove the clause no. 4 (2) (b), and those RE project who are availing the benefit of waiver of transmission charges/wheeling charges and banking of electricity may also be eligible for REC.
- 2) The self consumption in captive power generating station which is exempted for RPO obligation (By concern state SERC) then in that case it must be eligible to sale REC in the market.
- 3) There should no be limits for applying issuance of certificate or else it should be minimum 5 Years from the corresponding generation.

We shall be grateful if you would kindly consider our Comment/suggestion to incorporate the above on Draft Central Electricity Regulatory Commission (Terms and Conditions for Renewable Energy Certificates for Renewable Energy Generation) Regulations, 2022.

Thanking you,

Yours faithfully
For **Shri Bajrang Power and Ispat Ltd**



(S. K. GOYAL)
DIRECTOR

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