



**KERALA STATE ELECTRICITY BOARD LIMITED**

*Incorporated under the Companies Act, 1956*

*Corporate identity Number: U40100KL201 ISGC0272424*

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KSEB/TRAC/CG/Draft Regulations/CERC Regulations/2021-22/791

18 -3-2022

**To**  
**The Bench Officer,**  
**Central Electricity Regulatory Commission,**  
**Chanderlok Building, Janpath Marg,**  
**New Delhi.**

Sir,

Sub: Central Electricity Regulatory Commission (Terms and Conditions for Renewable Energy Certificates for Renewable Energy Generation) Regulations, 2022– Comments –reg:

Ref: Notification No. RA-14026(11)/1/2022-CERC Dated: 15-2-2022 of CERC.

Kind attention of the Hon'ble Commission is invited to the draft Central Electricity Regulatory Commission (Terms and Conditions for Renewable Energy Certificates for Renewable Energy Generation) Regulations, 2022. KSEBL comments are submitted below for kind consideration. It is requested that the comments may kindly be considered while issuing final regulation.

**1. Regulation 4: Eligibility for Issuance of Certificates**

**4.2(a)** : As per the draft Regulations, a renewable energy generating station shall be eligible for issuance of Certificates, if (a) the tariff of such renewable energy generating station has not been either determined or adopted under section 62 or section 63 of the Act, or the electricity generated is not sold either through an electricity trader or in the Power Exchange, for RPO compliance by an obligated entity;

**Comments:**

It is requested that the draft Regulation may be modified such that renewable energy generators entering into contracts with obligated entities for meeting the RPO shall not be eligible for REC.

2. **Regulation 7: Revocation of Accreditation** :The draft Regulations has provision for revocation by RLDC, which is applicable for entities connected to ISTS.

**Comments: Provision for revocation of accreditation of intrastate entities may also be included.**

3. **Regulation 11 & 13: Exchange and redemption of certificates**

In addition to the trading at Power Exchanges, the Draft Regulations have proposed to allow trading of RECs through traders. Regulation 13 stipulates that the price of Certificate shall be as discovered in the Power Exchange(s) or as mutually agreed between eligible entities and the electricity traders:

**Comments: It is apprehended that this may affect the competitive price discovery of RECs in Power Exchanges. It is also requested that 'forbearance' price may be specified for REC trading in Power Exchanges.**

Yours faithfully,

  
Chief Engineer (Commercial & Tariff)  
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