

No. SECI/PS/CERC/48103

Date: 15.03.2022

To,

Sh. Sanoj Kumar Jha,
Secretary,
Central Electricity Regulatory Commission
3 rd & 4 th Floor, Chanderlok Building,
36, Janpath,
New Delhi- 110001

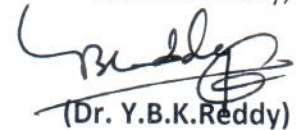
Sub: Comments on Draft Central Electricity Regulatory Commission (Terms and Conditions for Renewable Energy Certificates for Renewable Energy Generation) Regulations, 2022

Dear Sir,

This has reference to the Draft Central Electricity Regulatory Commission (Terms and Conditions for Renewable Energy Certificates for Renewable Energy Generation) Regulations, 2022, issued by CERC vide notification dated 15.02.2022. In line with the directions as per the Public Notice issued on 15.02.2022 on the above regulations, the comments from Solar Energy Corporation of India Ltd. (SECI) on the same, are enclosed herewith for your perusal.

Thanking you,

Yours faithfully,


(Dr. Y.B.K.Reddy)

Addl. General Manager (PS)

**SOLAR ENERGY CORPORATION OF INDIA LIMITED
NEW DELHI**

Comments on the draft REC Regulations

Sl. No.	Regulation No.	Existing provisions	Proposed Modifications	Remarks
1.	2.(1)	(o) ‘renewable energy sources’ means sources of renewable energy such as hydro, wind, solar including its integration with combined cycle, biomass, bio fuel cogeneration, urban or municipal waste and such other sources as recognized or approved by the Central Government;	(o) ‘renewable energy sources’ means sources of renewable energy such as hydro, wind, off-shore wind , solar including its integration with, battery energy storage system (BESS), combined cycle, biomass, bio fuel cogeneration, urban or municipal waste and such other sources as recognized or approved by the Central Government;	Added to remove ambiguity and inclusion of BESS and off-shore wind.
2.	4.(1)	Following entities shall be eligible for issuance of Certificates: (a) Renewable energy generating station, (b) Captive generating station based on renewable energy sources, (c) Distribution licensee, and (d) Open access consumer	Following entities shall be eligible for issuance of Certificates: (a) Renewable energy generating station, (b) Captive generating station based on renewable energy sources, (c) stand-alone BESS project (c) Distribution licensee, and (d) Open access consumer	Bringing Standalone BESS into the multiplier mechanism will boost financial viability of these projects, as the current tariffs for capacity procurement from these systems are high.
3.	4.	Additional clause	(5) Irrespective of 4.2 above the captive generating station/distribution licensee will be eligible for Renewable Energy Certificates either within or excess of RPO limit, will get Renewable energy certificates for RE projects with BESS, Standalone BESS and off-shore wind projects.	Standalone BESS projects are envisaged to be setup under Section 63 in a large capacity through bidding by SECI, to bring rapid reduction in procurement costs. ISTS-waiver has also been extended to BESS Projects for a specified duration, to enable achieving the initial targets. REC Multiplier mechanism would be another boost to storage capacity addition. Thus, BESS projects need to be exempted from the list of projects ineligible for the multiplier mechanism. Also the high cost off-shore wind projects to be promoted initially.

4.	12.(2)	Renewable Energy Technologies	Certificate Multiplier	Renewable Energy Technologies	Tariff	Certificate Multiplier	In line with the above. <i>(Table in Appendix-1 also to be modified suitably)</i>
		On-Shore Wind and Solar	1	On-Shore	<=4	1	
		Hydro	1.5	Wind and Solar			
		MSW and non-fossil fuel-based cogeneration	2	Off-shore Wind	6-8	2	
				Hydro	4-6	1.5	
				Biomass and biofuel	2.5	MSW and non-fossil fuel-based cogeneration	
		Biomass and biofuel	8-10			2.5	
		RE Projects along with Energy Storage Systems	4-6			1.5	
		Standalone BESS	6-8			2.0	