

To,  
Shri Sanoj Kumar Jha,  
Secretary, Central Electricity Regulatory commission,  
3<sup>rd</sup> & 4<sup>th</sup> Floor , Chanderlok Building  
36, Janpath, New Delhi –110001

Sub- Comments/Suggestions/Objections Draft Central Electricity Regulatory Commission (Terms and Conditions for Renewable Energy Certificates for Renewable Energy Generation) Regulations, 2022

Respected Sir,

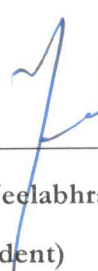
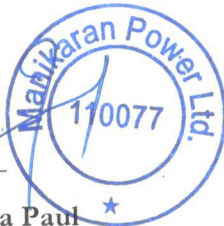
We, Manikaran Power Limited (“MPL”), are a Category 1 trading licensee under Central Electricity Regulatory Commission (Procedure, Terms and Conditions for grant of trading licensee and other related matters) Regulations, 2020.

This is in reference to the Hon’ble Commission Public Notice No RA-14026(11)/1/2022-CERC dated 15.02.2022 seeking comments/objections/suggestions on the Draft Central Electricity Regulatory Commission (Terms and Conditions for Renewable Energy Certificates for Renewable Energy Generation) Regulations, 2022. In view of the same, we hereby submit our comments and suggestions on the proposed Draft regulations.

We humbly request the Hon’ble Commission to kindly consider the same while approving the aforesaid regulations.

Thanking you,

For and behalf of Manikaran Power Limited,

  
  
Mr. Neelabhra Paul  
(President)

Proposed Regulation	MPL's Comments and Suggestions
<p><b>Regulation 8(2)- Grant of Registration for Certificates</b></p> <p>The registration for Certificates granted in terms of these regulations shall be valid for <b>15 years</b> from the date of registration for Certificates.</p>	<p>So should be the Accreditation validity extended for 15 years.</p>
<p><b>Regulation 11(7) Revocation of Accreditation</b></p> <p>The Certificates issued to captive generating stations based on renewable energy sources to the extent of self-consumption shall stand redeemed on compliance of RPO.</p> <p>Provided that the State Agency shall inform the Central Agency about such redemption of Certificates, upon which the Central Agency shall extinguish such Certificates and update its records.</p>	<p>If the Quantity of Certificates issued to CGPs based on self-consumption from Renewable Energy sources is more than the requirement for RPO compliance then, surplus Certificates in excess of RPO compliance must be allowed for sale.</p>
<p><b>Regulation 15- Fees and Charges</b></p> <p>The Commission may, based on the proposal from the Central Agency, determine the fees and charges payable by the eligible entities for accreditation, registration, issuance of Certificates and other matters connected therewith.</p>	<p>Since the value of RECs have been on a downfall trend, the associated expenses towards Accreditation/Registration and Issuance must also be amended appropriately so that adequate recovery is obtained by the RE generator.</p>

