



OPG POWER GENERATION PVT. LTD.  
CIN : U40109TN2005PTC055442

Ref: OPGPG/CERC/CCC/31122024

Dated: 31.12.2024

To

The Secretary,  
Central Electricity Regulatory Commission,  
7th Floor, Tower-B, World Trade Centre,  
Nauroji Nagar,  
New Delhi 110029

**Subject-** Comments on Draft Central Electricity Regulatory Commission (Terms and Conditions for Purchase and Sale of Carbon Credit Certificates) Regulations, 2024

**Reference** – Public notice issued by Hon'ble CERC for comments on Draft Central Electricity Regulatory Commission (Terms and Conditions for Purchase and Sale of Carbon Credit Certificates) Regulations, 2024 dated 13<sup>th</sup> November 2024

Dear sir,

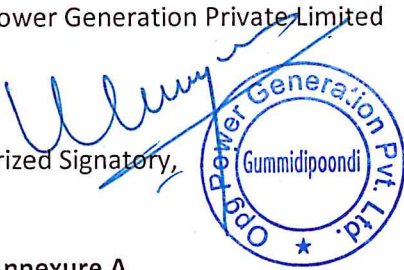
This is with reference to Hon'ble CERC public notice under reference with regard to seeking comments and suggestion of stakeholder on "Draft Central Electricity Regulatory Commission (Terms and Conditions for Purchase and Sale of Carbon Credit Certificates) Regulations, 2024".

In this regard, the detailed comments are enclosed as Annexure A. It is kindly requested that same may please be taken on record and considered while finalizing the regulation.

Thanking you.

Yours Faithfully,  
OPG Power Generation Private Limited

Authorized Signatory,



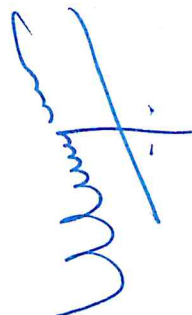
Encl: Annexure A

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S N o	Regulation Reference	Draft regulation	Comments/ Suggestions
1	2 (1) c)	Banking and Extinguishment of CCCs means banking and Extinguishment of CCC as provided in detailed Procedure for Compliance Mechanism developed under Section 12 of the Carbon Credit trading Scheme, 2023, as amended from time to time	The Detailed Procedure for Compliances Mechanism do not contain the work "Extinguishment". To avoid confusion, the same terms can be referred in the regulations
2	2 (1) m)	"Obligated Entities" shall have the same meaning as assigned to it in clause (l) of Section 2 of the Carbon Credit Trading Scheme, 2023, as amended from time to time;	<a href="https://beeindia.gov.in/en/programmes/carbon-market">https://beeindia.gov.in/en/programmes/carbon-market</a>  In the above link, Under Clause 4.3, Sub clause 7) "The nine sectors – Aluminium, Chlor Alkali, Cement, Fertiliser, Iron & Steel, Pulp & Paper, Petrochemicals, Petroleum refinery, and textile are to be considered for gradual transition and more sectors would be included in future". Commission may please clarify whether Thermal Power Plants are being covered at present in the CCTS Scheme, 2023. We request that the thermal power plants may be excluded due to its nature of operation.
3	2 (1) l)	"Non-Obligated Entities" shall have the same meaning as assigned to it in clause (k) of Section 2 of the Carbon Credit Trading Scheme, 2023, as amended from time to time;	Commission may please clarify that ,In case, in future, if any entity registered as " Non-Obligated Entity" gets changed to " Obligated entity" due to amendment to the Principal Act, can the CCCs in the entity Account will be considered in the Registry for treatment under "Obligated Entities"
4	9 3)	The CCCs issued to obligated or non-obligated entities by the Bureau on the approval of the Central Government and credited in the CCC Registry may be placed for dealing in any of the Power Exchanges by the CCCs holder, and such CCCs shall be available for dealing in accordance with the Rules, Business Rules and Bye-Laws of the Power Exchanges	The Commission may please clarify whether a CCC purchased by an Obligated entity can be resold at any of the Exchange.



Annexure A

5	11 (4) (a) (b) (c)	(a) Abnormal increase or decrease in prices of CCCs; (b) Sudden volatility in the prices of CCCs; and (c) Sudden high or low dealing of CCCs on a Power Exchange	The Commission may please clarify whether any volume limits will be imposed for each registered entity.
6			Sequestration benefits also to be included. For example, the bamboo plantation being done by both obligated and non-obligated entities which absorbs carbon, should be eligible for CCCs.
7			Can we get CCCs in case an entity decides to discontinue its operation by which carbon emission is avoided.

