

82246 / 2024 / CAV-CERC

Df. 16-12-24



Date : 10-12-2024

To,
The Secretary
Central Electricity Regulatory Commission
6th, 7th & 8th Floors, Tower B, World Trade Centre,
Nauroji Nagar, New Delhi- 110029

D/STW
JC(DA)

Sub : Comments/Suggestions on Draft CERC (Terms & Conditions of Purchase & Sale of Carbon Credit Certificates) Regulations, 2024

ACCRA
DR

Ref : Public Notice on Draft Central Electricity Regulatory Commission (Terms & Conditions of Purchase & Sale of Carbon Credit Certificates) Regulations, 2024 dated 15th November 2024.

Respected Sir,

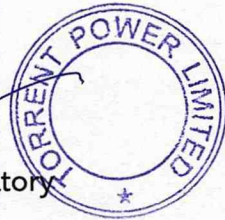
This is in reference to the public notice issued by this Hon'ble Commission on its website inviting comments/suggestions on the Draft Central Electricity Regulatory Commission (Terms & Conditions of Purchase & Sale of Carbon Credit Certificates) Regulations, 2024 dated 15th November 2024. We would like to thank Hon'ble Commission for coming up with these much-needed regulations to shape the Carbon Credit Market in India. Accordingly, we are hereby enclosing our comments and suggestions as 'Annexure-I' for your reference.

We request the Hon'ble Commission to kindly consider our comments/suggestions while finalizing the draft regulations.

Thanking you.

Yours Sincerely,

Authorized Signatory



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18-12-24
L-524/JC(RA)
18/12/2024

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TORRENT POWER LIMITED

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Torrent Power Comments on Draft Central Electricity Regulatory Commission (Terms & Conditions of Purchase & Sale of Carbon Credit Certificates) Regulations, 2024:

Sl.	Draft Regulation	Suggested Comments	Rationale
1.	9(2) - There shall be two separate market segments in the Power Exchanges for dealing in CCCs, namely, Compliance Market for the obligated entities and Offset Market for the non-obligated entities.	Instead of creating two different markets for different categories, the commission may consider creating a single market where all the carbon credit certificates can be traded.	Two separate markets will restrict the potential for market growth & players and it may also lead to two different price categories. Further, the Hon'ble Commission has also not clarified that in case of two different categories in the market, will the Carbon Credits be <u>inter tradable</u> between these two <u>markets?</u>
2.	9(4) - The frequency of transactions of CCCs through the Power Exchanges shall be on a monthly basis or in such periodicity for all registered entities as per the procedure approved by the Commission.	Instead of allowing trading once in a month, it is proposed to allow trading on daily basis (business days).	This will help better price discovery of the carbon Credits in the market.
3.	Clause 8 - (Issuance and Surrender of Carbon Credit Certificate) of the Detailed Procedure for Compliance Procedure under CCTS published by BEE in July 2024, sheds no light on the process/mechanism of issuing Carbon Credits to the Non-Obligated Entities. Hence there is an ambiguity about this process. Hon'ble Commission may enlighten on this.		