

**The Secretary,  
Central Electricity Regulatory Commission,  
3rd & 4th Floor, Chanderlok Building,  
36, Janpath, New Delhi -110001**

Your office correspondence : No. RA-14026(11)/1/2023-CERC dated 17.02.2024

**Sub: Draft Central Electricity Regulatory Commission (Terms and Conditions for Tariff determination from Renewable Energy Sources) Regulations, 2024**

Respected Sir,

We are submitting our plea against the draft regulation which is up for discussion on 19<sup>th</sup> March 2024;

We request you to please consider our submission for discussion as well given at the end of this email for your kind consideration and discussion on the proposed date;

The following executives from our organisation shall attend either ONLINE else attend in person to have discussion regarding the same

1. Shridhar Nambi, Director and CEO
2. S Hari Prakash, Sr. Vice President
3. A Srinivas Rao, Vice President

Thanking you,

Yours' sincerely,

For Greenesol Power Systems Pvt. Ltd.,

**S Hari Prakash**

**Sr. Vice President**

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**Submission by Greenesol Power, Bangalore**

<b>Parameter</b>	<b>Proposed Change</b>	<b>Remarks</b>
Capital Cost	About 25 Cr / MW	The cost of Processing of MSW is not included in this rate proposed;
O & M Cost	8.50%	Slagging , Erosion, Corrosion cause O&M issues considering the heterogenous nature of the Waste. Further skilled manpower is required;
Aux Consumption	10-12%	Considering the additional requirement of Grate technology and esp. advanced Flue Gas Cleaning system being additional over other regular RE plant, this must be considered
PLF	80%	7500 hours of working is a norm followed in this sector. However, all working hours do not translate to capacity generation , because Waste is heterogenous and seasonal;
Refurbishment Cost	20% of Grate & Boiler cost	6th Year
	20% of Grate & Boiler cost	10th Year
	5% of Turbine Cost	
	25% of the Grate & Boiler Cost	15th Year
	25% of the Grate & Boiler cost	20th Year
Project Life	25 years	
Interest Rate	Simple Line of credit with concessional interest and 15 years of repayment commencing 2 years after COD to be extended at Concessional Rate of Interest as like in China , Vietnam etc;	
More significant roles by Funding agencies such	In the initial journey of RE sector in India, agencies such as IREDA and similar funding agencies has played a vital role in giving PRIORITY of FUNDING for such RE Projects, now similar priority must be given to WTE	

as IREDA, Large PSU Bank, PFC etc	<p>Plant set up with concessional rate of interest compared to commercial rates and also better moratorium period, incentives in case of early commissioning of such WtE plant like was offered before for RE sector during the initial period.</p> <p><b>We request the respectable office of CERC to take up with the concerned Govt. department to provide this support</b></p>
Tariff	<p>A uniform, consistent PAN India Tariff , on the lines of PR China is the need of the hour. Such PAN India Tariff is proposed as Rs 8 /kwh on a levelized basis for min. 10 years after COD</p>
	<p>Considering conservation of water used by such RE Power Plant, all developers are proposing and setting up the WtE plants considering Condensate Cooling arrangement using Air Cooled Condenser. This involved additional civil foundation cost and ACC system is much bigger and more elaborate compared to the earlier used simple “Water Cooled Condensing System” and hence an additional price of 25 paise per KWHr to be provided</p>
MSW Vs RDF	<p>There is no such distinction abroad. The only aim is “<b>Scientific disposal of large-scale Waste and in controlled environment</b>” and there is only categorisation which is “<b>Energy from Waste</b>”. Only aspect to be taken care, is compliance of the Plant with Norms of Emission as given in SWM Rules 2016;</p>
Import taxes and duties and local levies	<p>In the recent year, GST applicable for such WtE Plant has been increased from 5% to 12%, which has increased the burden on the Developers; Rather for such capital intensive plants, GST applicable must be made even “ZERO” like was offered very initially for RE Projects against Project Authority certificate; This really helped in the boom of RE Plants in India and hence the same benefit is now required in the context of WtE Plants as well;</p> <p>Even Basic Customs Duty currently being charged is 5.5% (including cess) can be reduced to “ZERO” against CCD certificate such as issued by MNRE; This is to be considered when considering that Import Duties and GST applicable is a cost to the project for the developer and indirectly stressing the sector esp. at this nascent stage of the WtE Plants coming up in India;</p> <p><b>We request the respectable office of CERC to take up with the concerned Govt. department to provide this support</b></p>