JINDAL INDIA
RENEWABLE ENERGY
Promoted by BC Jindal Group

JINDAL INDIA RENEWABLE ENERGY LIMITED
REGD. OFF: HABITAT INDIA, C-3, QUTAB INSTITUTIONAL AREA,
KATWARIA SARAI, NEW DELHI- 110016
CIN NO. U74110DL2015PLC276224

Ref: JIREL/RA/Secretary/CERC/12SM2025/FY 26/01
Date: 21.11.2025

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

Sub: Comments on Determination of the Buyout Price as an alternate compliance mechanism towards fulfilment of Renewable Consumption Obligation (RCO).

Ref:

1. CERC's proposal under Petition No. 12 / SM/2025 (Suo-Motu) dated 22.10.2025.

Respected Sir,

We would like to introduce 'Jindal India Renewable Energy Limited' (JIREL), Renewable energy arm of B.C. Jindal Group. JIREL is an Independent Power Producer (IPP) primarily focusing on investment in developing the generating capacities based on new technologies and methods involving combined generation of wind and solar power and other emerging technologies like Battery storage system.

CERC vide above referred proposal dated 22.10.2025 has invited comments from stakeholders on proposal on Determination of the Buyout Price as an alternate compliance mechanism towards fulfilment of Renewable Consumption Obligation (RCO).

India's Renewable Consumption Obligation (RCO) framework is a critical regulatory mechanism designed to drive demand for renewable energy capacity and underpin the country's 500 GW RE target by 2030.

In view of above, the comments/suggestions/objections on the draft order are detailed hereunder as Annexure-I.

We humbly request the Hon'ble Commission to take into consideration the below comments/suggestions/objections while finalising the order.

Yours faithfully,
For Jindal India Renewable Energy Limited

Authorised Signatory

Jindal India Renewable Energy Limited

Email – info@jirel.com

Phone : 011-40841950

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Annexure-I

Suggestion	Justification
The MOP vide notification dated 27.09.2025 has stipulated three options to fulfil RCO obligation. • *consumption of renewable electricity, either directly or through an energy storage system.* • *purchased or self-generated Renewable Energy Certificates issued in accordance with regulations notified by the Central Electricity Regulatory Commission including Renewable Energy Certificates acquired under Virtual Power Purchase Agreements.* • *payment of the buyout price specified by the Central Electricity Regulatory Commission.* The order is silent about hierarchy of above alternatives, it treats all three as equal choice hence any of the obligated entity will tend to go for the third option as it is simplest and emancipate an obligated entity from risk related to development of project.	Although the order mentions It is only when either of these two options (direct consumption of RE and purchased or self-generated REC's) is exhausted then the Designated Consumers should lean on the third option for RCO Compliance. In view of above there is regulatory intent to prioritize direct green energy procurement and REC compliance, there must be robust checks establishing that: • The entity made reasonable, genuine attempts to source renewable energy directly or via REC markets. • The buyout option is used strictly as a last resort only after demonstrating inability to fulfil RCO through first two options. (direct consumption of RE and purchased or self-generated REC's) We request honrable commission to develop and notify such a procedure which is both, policy-consistent and aligned with market best practices. which ensures fairness and accelerates the RE capacity addition by ensuring the integrity of the RCO framework.

Email – info@jirel.com
Phone : 011-40841950