

Suggestions on Draft RERC (Renewable Energy Obligation) (Seventh Amendment) Regulations, 2021



Rajasthan Electricity Regulatory Commission (RERC) has invited comments/suggestions on “Draft RERC (Renewable Energy Obligation) (Seventh Amendment) Regulations, 2021”. The present submission is in response to the notice published on the commission's website. We request the Commission to accept this submission on record.

GENERAL COMMENTS

While RPOs are playing a key role in creating markets for renewable energy, the business case for integration and adoption of RE also needs to be evaluated. The cost impact for scenarios wherein the adoption of RE beyond RPO limits is undertaken needs to be understood. This may aid accelerated adoption of RE beyond the RPO targets. The Commission may mandate the Discoms to undertake necessary studies and modelling to prepare such scenarios to aid the evolution of RPO targets in the future.

SECTION WISE COMMENTS

Section 2, Clause 1

2. Amendment in Regulation 4 of the Principal Regulations:

(1) The entries at s.no. 4, 5 & 6 for the FY 2021-22, 2022-23 & 2023-24 shall be substituted in the existing Table appearing under the heading (A) of sub-regulation (2):

S. No.	Year	Obligation expressed as a percentage of energy consumption (%) excluding consumption met from hydro sources of power.		
		Non-solar	Solar	Total
1	2021-22	9.98%	8.50%	18.48%
2	2022-23	10.45%	9.50%	19.95%
3	2023-24	11.16%	10.50%	21.66%

Our Submission:

The status of RPO compliance by Discoms is provided below:

Financial Year	RPO Target	Achievement
2017-18	14.25%	10.62%
2018-19	13.35%	12.26%
2019-20	15.00%	13.75%
2020-21 (upto Oct 20)	16.65%	14.91%

Source: *Suo-moto RERC Order 1891/2021 dated 25/03/21*

It can be seen that even though the Discoms have not been able to comply with the RPO targets, the shortfall witnessed is not huge. Therefore, we agree with the proposed RPO targets and would request the Hon'ble Commission to enforce stricter compliance with the targets. The commission may also take suitable penal action in case of any further non-compliance in this matter such as disallowing a percentage of the RPO target shortfall.

Section 2, Clause 1 (a)

a) Hydropower Purchase Obligation (HPO) shall be met from the power procured from eligible large hydropower projects including pump storage projects having a capacity of more than 25 MW (LHPs) commissioned on and after 08.03.2019 and up to 31.03.2030 in respect of 70% of the total generated capacity for a period of 12-years from the date of commissioning. Free power to be provided as per the agreement with the State Government and that provided for Local Area Development Fund (LADF), shall not be included within this limit of 70% of the total generating capacity.

Our Submission

It is hereby submitted that the term 'Total Generated Capacity' and the statement 'in respect of 70% of the total generated capacity for a period of 12-years from the date of commissioning' is not clear and requires more deliberation. Therefore, it is requested to provide a clear explanation of the statement made herein.