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# Suggestions on (Terms and Conditions for **Green Energy** Open Access) Regulations, 2024

Rajasthan Electricity Regulatory Commission

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CENTRE FOR ENERGY, ENVIRONMENT & PEOPLE

The Rajasthan Electricity Regulatory Commission has framed the Draft 'RERC (Terms and Conditions for Green Energy Open Access) Regulations, 2024' and invited suggestions/comments from interested parties before finalizing them.

This submission is made in response to the notice published on the Commission's website. We kindly request the Commission to accept this submission for the record.

#### **Section 11.4 | Additional Surcharge**

The regulations propose - Additional Surcharge shall not be applicable to the Green Energy Open Access consumer for the quantum of Green Energy Open Access availed if the fixed charge is being paid by such Green Energy Open Access consumer to the distribution licensee for the quantum of Green Energy Open Access availed up to contract demand / sanctioned load with the licensee.

We highlight that Discoms currently under-recover fixed costs through the fixed charges levied on consumers. The additional surcharge determined by the Commission compensates for excess contracted generation capacity and helps cover fixed costs. Since Open Access consumers already pay wheeling charges, this adds complexity to accounting. For transparency and sustainability in the distribution sector, we recommend revising the provision to state that Green Energy Open Access consumers shall pay either the fixed charges or the additional surcharge, whichever is higher.

#### **Section 22 | Expanded Use of Green Certificates**

The draft regulations introduce the concept of green certificates but they does not specify their application or use. We recommend making these certificates non-transferable to ensure that they are used only by the original open access consumer.

#### **Section 18 and 19| Transparency and Public Reporting**

The draft regulations provide for an information system and monthly reports by the SLDC. We recommend mandating public access to these reports and information on green energy open access, detailing capacity, energy flows, usage, transfer capability information (both total and available), and cost structures. The data should also be compulsorily updated periodically to ensure real-time information availability. This will enhance transparency and decision-making for consumers and stakeholders, and assist Distribution Licensees in medium- and long-term planning, as well as understanding trends in green open access consumption.