

Dhaval Talati

6 Sale of Renewable Energy Certificates are different from intangible goods & be classified as “Electrical Energy”. Facts of the Case The appellant, M/s Ujjas Energy Ltd., incorporated under the Companies Act, was engaged in manufacturing transformers, setting up solar plants, and generating/selling solar energy. It established solar plants in Rajgarh and Barod and sold electricity via open access to obligated entities (like DISCOMs and captive consumers). Apart from direct sale of electricity, it also obtained Renewable Energy Certificates (RECs) under the REC mechanism (regulated by the Central and State Electricity Regulatory Commissions) and sold them through the Indian Energy Exchange to obligated entities. The Assessing Officer classified the sale of RECs under Entry 3, Part-II, Schedule-I.....