

Financial Incentive for Setting Up Coal/Lignite Gasification Projects in India

Responses to Queries/Suggestions on Request for Proposals (RFPs) dated 30.09.2025

October 22nd, 2025

CCT Section
Ministry of Coal, Government of India
622-A, Shastri Bhawan, New Delhi 110001

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A pre-bid conference with industry stakeholders was held on 10 October 2025 regarding the RFPs published on 30 September 2025 for providing financial support to coal/lignite gasification projects in India. The clarifications sought have been addressed, and responses submitted are as follows:

Sno.	Clause Reference	Queries/Suggestions	Revised Clause/Remarks
1.	Clause 1.1.4	Definition of "Indigenous Technology": Kindly clarify the exact definition or parameters that constitute "indigenous technology" for the purpose of determining eligibility under the "commercially scalable demonstration project" category. Specifically, we request guidance on whether: a. Indigenous technology refers to technology developed and owned within India (including patents/IP), or b. It includes technology adapted or customized in India through technical collaboration or technology transfer.	For the purpose of determining eligibility under the "commercially scalable demonstration project" category, "indigenous technology" refers to technology that has been developed, owned, and substantially proven within India, including any associated patents or intellectual property rights. However, technology that is adapted, customized, or further developed in India through technical collaboration or technology transfer may also be considered indigenous, provided that: a) Significant development, adaptation, or innovation occurs within India, and b) Resulting technology is demonstrably capable of independent commercialization under Indian conditions.
2.	Clause 1.1.4	Interchange between Demonstration and Small-Scale Projects:	Such inter-category change from Demonstration to Small-Scale Project, or vice versa, may be allowed, provided that
		In case an applicant initially applies under the Commercially Scalable Demonstration Project category (with indigenous technology) or Small-Scale	the applicant continues to satisfy all relevant qualification and eligibility criteria applicable to the new category.

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		Project category, but subsequently, based on technical or economic viability assessment, finds it necessary to	
		shift from one category to the other—	
		kindly confirm whether such inter-category change	
		(from Demonstration to Small-Scale or vice versa) is permissible, provided all other qualification criteria,	
		including minimum CAPEX and syngas production	
		parameters, continue to be met.	
3.	Clause 1.1.4	Under Category-III, for a demonstration project	Please refer Clause 1.1.4 of the RFP
		involving Underground Coal Gasification (UCG) at	The requirement for the technology to be indigenous and
		pilot scale, it is noted that no indigenous technology	proven at the pilot scale applies to all commercially
		exists in India with proven pilot-scale reference.	scalable demonstration projects other than Underground
		Example for small scale plants, the exament requirement	Coal Gasification (UCG).
		Further, for small-scale plants, the current requirement specifies that the technology should be in commercial	In the case of a commercially scalable demonstration project involving UCG, the technology must be proven at
		operation anywhere in the world. However, for UCG,	the pilot scale, and the capex on the proposed coal
		most projects globally are still at the pilot scale.	gasification unit must be at least ₹100 crore.
		In view of this, we propose that the requirement for	
		proven indigenous or commercially operational	
		technology may be dropped or relaxed for UCG pilot-	
		scale projects to enable early-stage technology	
1	Clause 1 1 7	demonstration and adoption in India.	The same shall be as you clouded 1.1.7 of the DED
4.	Clause 1.1.7	The requirement to secure debt financing from banks or financial institutions for the projects may be waived	The same shall be as per clause 1.1.7 of the RFP
		or removed.	

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5.	Clause 2.2.2,	The Financial Eligibility for Category-II specifies that	The qualification criteria shall be as per the RFP.
	Clause 1.1.7	the bidder must have a minimum Net Worth of 30% of	
		the total equity commitment for the project, as pe the	
		Board-approved PFR/DPR and the latest audited	
		financial statements and that this requirement is to be	
		evaluated based on a Debt:Equity ratio of 70:30 for	
		financing the project, regardless of the actual means of	
		finance, with Net Worth computed as defined under	
		clause (57) of section 2 of the Companies Act, 2013.	
		Upon preliminary review of our financials, we note	
		that we might not fully meet the Net Worth	
		requirement as outlined. This is primarily due to	
		legacy accumulated losses, as we had acquired M/s	
		GR Krishna under the NCLT process, where	
		operations had ceased. Since acquisition, we have	
		restarted operations from the ground up, and are	
		currently in the improvement phase. Our net worth is	
		being progressively rebuilt, and we are confident that	
		it will develop steadily over the coming financial	
		periods as operations stabilize and capacity utilization	
		improves. We respectfully submit that this transitional	
		financial position does not reflect our true potential,	
		promoter strength, or long-term viability. As a group,	
		we bring over two decades of experience in DRI	
		production and integrated steelmaking, backed by	
		proven technical, operational, and managerial	

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		capabilities. We are also continuing to review the RFP	
		in detail and evaluating possible avenues for	
		alignment with the criteria.	
		Moreover, as per Clause 1.1.7 of the RFP dated 30	
		September 2025, the first instalment of the	
		Financial Incentive will be disbursed only after the	
		bank/financial institution has sanctioned and	
		disbursed the project loan, and after we have	
		contributed 30% equity in the form of paid-up	
		capital. This provision inherently implies that the	
		financial viability and credibility of the project will	
		already have been independently assessed and	
		validated by the lending institution. Banks do not	
		sanction loans without conducting rigorous due	
		diligence covering promoter credibility, financials,	
		business viability, risk profile, and repayment	
		capability. Therefore, a formal loan sanction is a	
		strong third-party validation of our financial	
		soundness and our ability to meet the equity	
		contribution and execute the project responsibly.	
		In addition to the above, we wish to inform you that	
		we are currently being considered for a parallel project	
		focused on the use of green hydrogen in the iron and	
		steelmaking process. In that initiative, we propose to	
		achieve up to 80% hydrogen utilisation through the	
		syngas route in our Vertical Shaft Furnace for DRI	

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	Reference	production. This future-forward approach further	
		underscores our commitment to cleaner technologies,	
		CO, reduction, and alignment with India's energy	
		transition objectives.	
		Given this context, we humbly request the Ministry	
		to reconsider or relax the strict Net Worth	
		criterion, or to provide flexibility for companies	
		undergoing financial recovery, particularly when	
		backed by formal bank sanction letters and equity	
		commitment. This will enable deserving and	
		experienced bidders, particularly from the secondary	
		steel sector, to meaningfully participate in this forward	
		-looking initiative.	
		We would be grateful for the Ministry's kind	
		consideration of our request to allow us to participate	
		under the Scheme, and we reiterate our full	
		commitment to making this a model project in the coal	
		gasification-driven steelmaking ecosystem	
		Note: Our project, estimated at approximately 900	
		crores, involves the establishment of a coal	
		gasification-based DRI (HBI) production facility using	
		advanced technology via an Air Separation Unit and	
		Vertical Shaft Furnace, with an expected capacity of	
		2.5 lakh TPA. We believe it is fully aligned with the	
		objectives and structure of Category-II and represents	
		a first-of-its-kind effort in the secondary steel sector.	

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6.	Clause 4.6.1 b)	For the purpose of this calculation, the denominator should reflect the highest investment proposed by any	Clause 4.6.1 b) may be read as: 4.6.1 b) Investment score: (Proposed investment by the
		bidder, which has been correctly illustrated in the example provided in the RFP.	Bidder ÷ Highest proposed investment received among all Bidders) × 35% (thirty five percent).
		4.6.1 b) Investment score: (Proposed investment by the Bidder ÷ Highest plant capacity received	
		among all Bidders) × 35% (thirty five percent).	
7.	Annexure I -	At any stage of the project, if it comes to light that a	Any termination of the project will result in penalties and
	Point 16	Category-III project, whether a demonstration project	1
		or a small-scale product-based plant, is no longer	Agreement.
		technically or financially viable, are there any	
		provisions that allow the applicant to cease the project without incurring penalties?	
8.	Annexure-VIII	Carbon Capture, Utilization, and Storage (CCUS)	Under Category III, CCUS technologies may be integrated
		technologies should be explicitly supported under	as part of the proposed demonstration projects or small-
		Category-III (pilot and small-scale projects) for	scale product-based plants.
		coal/lignite gasification.	
