

are to be borne by the farmers for first five years and for rest of the period, the charges have been taken as per the neighboring State of Rajasthan where RERC has already determined the feed in tariff for KUSUM Scheme Component C.

D) It is further submitted that the Petition was drafted and submitted in the last quarter of the year 2019-20 and parameters relating to Interest on Debt, Repayment period of Debt, ROE, Discount factor, yearly escalation rate in Operation & Maintenance Charges etc. are based on the CERC RE Tariff Regulations for the control period 2017-20 and suo-motu order for determination of tariff for the year 2019-20, which are already adopted by the Hon'ble Commission and generic parameters like Debt Equity Ratio, Interest on Debt, Debt repayment period, ROE, Income Tax Rates and useful life/Tariff period have been adopted accordingly.

E) It is further submitted that CERC has notified the RE tariff Regulations for the Control Period 2020-23 on 23.06.2020 as per which some parameters provided in the Petition will change. Further, CERC has also notified the parameters for the year 2020-21 in the Petition No. 13/SM/2020(Suo-motu) for determination of Generic Tariff vide order dtd. 21.07.2020.

F) It is further submitted that as per past practice, it is expected that the RE Tariff Regulations for the period 2017-20 and SuoMotu Order for determination of Generic tariff for 2020-21 will be adopted by this Hon'ble Commission in due course of time. The comparison of such parameters as applicable to this Petition are brought out in paras below.

G) It is further submitted that in Component -C, Hon'ble Commission is requested to determine Feed-in-Tariff which will be applicable for sale/purchase of surplus power without any discount/reduction.

6 That in response to Para 6 of the reply filed by PSPCL it is submitted that the Petitioner's counter reply on the points raised for CUF,

Depreciation and Income tax areas given in paras below, which may kindly be read as part and parcel of the instant para.

- 7 That in response to Para. 7 of the reply filed by PSPCL it is submitted that PSPCL has not disputed the CUF of 17.14% being achieved from existing operating 43 numbers smaller solar power plants in Punjab (Based on net power exported to state grid) from which PSPCL is procuring power under the PPAs already signed.
- 8 That in response to Para 8 of the reply filed by PSPCL it is submitted that The Petitioner is not in agreement with the proposal of PSPCL to consider higher CUF based on different orders as discussed below:-

A) The Respondent PSPCL has extracted the provisions of CERC RE Tariff Regulations 2020-23 which provide that the minimum CUF for a Solar PV Plant will be 21%. The Explanatory Memorandum for adopting 21% CUF gives the justification which is based on analysis of such plants funded during last 3 years and the CUF is as under:-

| Capacity of plant | No. of Projects analyzed | Min CUF | Max CUF |
|---|--------------------------|--------------------------|---------|
| Up to 10000 KW | 17 | 16% | 27% |
| 10000 to 50000 KW | 32 | 17% | 28% |
| 50000 to 100000 KW | 17 | 18% | 29% |
| 100000 to 150000 KW | 3 | 23% | 29% |
| More than 150000 KW | 9 | 19% | 28% |
| Capacity of plants proposed under the Petition i.e. Component C | | | |
| Capacity 4, 7 and 10 KW | Pumps covered : 3900 | Proposed CUF : 17.14% | |

- B) As against the above analysis based on which CERC has decided the minimum CUF as 21%, the capacity of individual solar panels for each tube-well is only 4 to 10 KW i.e. the plants under consideration are 100 to 2500 times smaller and thus cannot be compared.
- C) Further, the Minimum CUF for up to 10000 KW projects has indeed been worked out as 16% in the analysis which may be

certainly of the smaller capacity projects i.e up to 4000Kw. Therefore average CUF for 4 to 10 KW projects as 17.14% being actual of power projects of capacity 1000 to 4000 KW is fully justified.

D) It is also a known fact that projects considered by CERC are mostly from solar parks of Rajasthan and Gujarat where irradiation is highest. Where-as in Punjab the irradiation is lower and CUF in Punjab is bound to be low.

E) The higher capacity projects are generally being installed with solar tracker facility which have higher CUF whereas the solar panels under consideration will be fixed tilt arrangement where the CUF will be lower.

F) Further, the orders dated 20.12.2019 of HERC referred to in this para of reply is on the Petition filed for deciding the generic tariff for projects of 500 KW to 2000 KW under Component A of the PM-KUSUM scheme and is not relevant to this Petition.

9 That in response to Para 9 of the reply filed by PSPCL it is submitted that these being of small capacity projects, technological advancements and material up-gradation cannot have material difference in the CUF. Moreover, the outages of these projects are likely to be higher as these are to be operated by farmer itself having limited technical knowledge.

10 That in response to Para 10 of the reply filed by PSPCL it is reiterated that the petition was prepared and filed much before the notification of RE Tariff Regulations 2020.

11 That in response to Para 11 of the reply filed by PSPCL, it is submitted that section 61 of the Act provides that State Commission shall be GUIDED by CERC Regulations. Thus the same are not mandatory.

12 That in response to Para 12 of the reply filed by PSPCL it is submitted that the Petition is not for seeking Project Specific tariff but levellised feed in tariff as is evident from the subject and prayer contained in the Petition.