

BEFORE THE HONORABLE GUJARAT ELECTRICITY REGULATORY
COMMISSION AT GANDHINAGAR

SUO MOTU PETITION NO. 1872 OF 2020

IN THE MATTER OF Monitoring of Compliance of Distribution Licensees for FY 2017-18 under the GERC (Procurement of Energy from Renewable Sources) Regulations, 2010 and subsequent amendments made in it.

RESPONDENT NO. 1 Gujarat Urja Vikas Nigam Limited
Sardar Patel Vidyut Bhavan
Race Course,
Vadodara - 390 007

Submission by Respondent No. 1 in Suo Motu Petition No. 1872 / 2020 in the matter of Monitoring of Compliance of Distribution Licensees for FY 2017-18 under the GERC (Procurement of Energy from Renewable Sources) Regulations, 2010 and subsequent amendments made in it.

- 1.0 It is most respectfully submitted that the Respondent No. 1 has gone through the Suo Motu Petition No. 1872 of 2020 initiated by Hon'ble Commission for verifying the compliance of RPO for FY 2017-18 by Distribution Licensees of the State in accordance with the provisions of GERC (Procurement of Energy from Renewable Sources) Regulations, 2010 and subsequent amendments made thereto.
- 2.0 It is to humbly submit that Hon'ble Commission from time to time has been determining tariff for procurement of power by Distribution Licensees from various Renewable Energy (RE) Sources for meeting of Renewable Power Purchase Obligation (RPO). In order to meet the RPO of its four Distribution Companies, GUVNL (Respondent No. 1) who is entrusted with the function of bulk purchase and bulk sale of



power, has been purchasing power from various RE Sources on behalf of its four Distribution Companies viz. PGVCL, UGVCL, MGVCL & DGVCL.

3.0 The contents mentioned in Suo Motu Petition No. 1872 of 2020 have been perused and response(s) thereto on behalf of Respondent No. 1 is detailed out hereunder:-

3.1 At the outset, it is to humbly submit before Hon'ble Commission that the Respondent No. 1 has successfully complied with the Renewable Power Purchase Obligation for FY 2017-18 by achieving the Total RPO of 10.03% against the Target RPO of 10%.

3.2 As regard to the RPO Status Report of Obligated Entities for FY 2017-18 as compiled by GEDA and as mentioned at Annexure-I referred at para 11 of the Suo Motu Petition, it is to mention that the RPO% achieved by Respondent No. 1 (on behalf of its four Distribution Companies) during FY 2017-18 is 10.03% and not 9.43% as mentioned in the instant Petition.

3.3 The Respondent No. 1 vide letter dated 23.07.2018 and email dated 24.07.2018 had forwarded the RPO Compliance Report (Final) for FY 2017-18 showing compliance of 10.03% to the Hon'ble Commission as well as GEDA. (Annexure A). It appears that GEDA has not updated the same in their records while compiling the RPO status of all Obligated Entities and conveyed the provisional RPO% of 9.43% of Respondent No. 1 in the status report of Obligated Entities for FY 2017-18 as intimated by Respondent No. 1 vide our earlier letter and email dated 11.05.2018. (Annexure B).

3.4 The RPO Compliance Report of Respondent No. 1 for FY 2017-18 as intimated to Hon'ble GERC vide our letter dated 23.07.2018 is reproduced in the table herein below:-



	Wind	Solar	Others	Total
RPO Required	7.75%	1.75%	0.50%	10.00%
MUs required	6563	1482	423	8468
RPO Compliance of GUVNL				
Qtr-I	2075	378	14	2467
%	2.45%	0.45%	0.02%	2.91%
Qtr-II	1891	212	19	2123
%	2.23%	0.25%	0.02%	2.51%
Qtr-III	1113	415	17	1545
%	1.31%	0.49%	0.02%	1.82%
Qtr-IV	1592	738	25	2355
%	1.88%	0.87%	0.03%	2.78%
Total	6671	1744	76	8491
%	7.88%	2.06%	0.09%	10.03%

3.5 In view of above, as regard to the para 6 & 7 in the Suo Motu Petition stating that upon completion of FY 2017-18, GUVNL on behalf of its four Distribution Companies viz. PGVCL, UGVCL, MGVCL & DGVCL has not filed any Petition before the Commission for compliance of their RPO for FY 2017-18, it is to humbly submit that by virtue of letter dated 23.07.2018, Respondent No. 1 had apprised Hon'ble Commission of having successfully achieved the RPO Compliance of 10.03% against the target RPO of 10% for FY 2017-18. Thus, there was no requirement of filing Petition before Hon'ble Commission.

3.6 It is also to hereby clarify that the letter dated 05.07.2018 referred at para 7 of the instant Petition has not been received by Respondent No. 1. Upon inquiry with other Distribution Licensees, it has come to our notice that the said letter was not marked to Respondent No. 1.

3.7 As regard to the Commission's directives at para 12 seeking details of actions taken for fulfillment of obligations by Respondent No. 1, the following is humbly submitted:-



3.7.1 The Respondent No. 1 had tied up wind capacity of 1038 MW during FY 2016-17 which was its all-time high record of executing PPAs with Wind Power Projects during a particular year. Generation benefit from such huge capacity tie-up helped Respondent No. 1 to fulfil the RPO Compliance for FY 2017-18.

3.7.2 Immediately upon receipt of directives of Hon'ble Commission vide letter dated 18.03.2017 for procurement of RE power only through Competitive Bidding, the Respondent No. 1 initiated Competitive Bidding Processes for procurement of power from Wind and Solar Projects by inviting tender(s) on 15.06.2017 and successfully tied up 500 MW wind and 500 MW solar capacity in FY 2017-18 at the most competitive tariffs. Thereafter, during FY 2018-19, the Respondent No. 1 tied up another 1000 MW Solar capacity (Non-Park based). Subsequently in FY 2019-20, the Respondent No. 1 concluded Raghnesda & Dholera Solar Park Based Tenders & tied up additional solar capacity (Park based) to the tune of 900 MW and 202.6 MW wind capacity. Besides, the Respondent No. 1 has recently tied up another 350 MW solar capacity (Non-Park based).

3.7.3 To sum up, it is to highlight that the Respondent No. 1 has tied up about 3400 MW wind and solar capacity through Competitive Bidding, out of which 565 MW solar capacity and 482 MW wind capacity has already been commissioned and the Respondent No. 1 has started reaping generation benefit therefrom. The remaining wind and solar projects are likely to be commissioned during FY 2020-21 & FY 2021-22 which shall be helpful in fulfilment of RPO compliance.

3.7.4 A detailed statement of tendering processes undertaken by the Respondent No. 1 for procurement



of wind and solar power demonstrating the efforts made by the Respondent No. 1 towards renewable capacity addition is enclosed herewith as **Annexure C**.

3.7.5 Thus, the Respondent No. 1 has been making all possible efforts exercising commercial prudence towards compliance of Renewable Power Purchase Obligation.

3.8 In view of the above, it is humbly submitted that Hon'ble Commission and GEDA may kindly update the "RPO Status Report of Obligated Entities for FY 2017-18" as already submitted by the Respondent No. 1 through letter dated 23.07.2018 and email dated 24.07.2018 and consider the RPO Compliance of Respondent No. 1 for FY 2017-18 as 10.03% against the target RPO of 10%.

4.0 In the above background, it is humbly submitted that Hon'ble Commission may kindly take note of the above submission and consider the RPO Compliance of Respondent No. 1 for FY 2017-18 as 10.03% against the target RPO of 10%.



RESPONDENT NO. 1

GUJARAT URJA VIKAS NIGAM LIMITED

Regd. No.: 485
Date: 15-7-2020

BEFORE THE GUJARAT ELECTRICITY REGULATORY COMMISSION
AHMEDABAD



SUO MOTU PETITION NO. 1872 OF 2020

IN THE MATTER OF Monitoring of Compliance of Distribution Licensees for FY 2017-18 under the GERC (Procurement of Energy from Renewable Sources) Regulations, 2010 and subsequent amendments made in it.

RESPONDENT NO. 1 Gujarat Urja Vikas Nigam Limited
Sardar Patel Vidyut Bhavan
Race Course,
Vadodara - 390 007



AFFIDAVIT

I, Girija Dave, daughter of Jagdish Dave aged about 34 years resident of Vadodara do hereby solemnly affirm and state as under:

1. I am the Deputy Chief Accounts Officer working in Gujarat Urja Vikas Nigam Limited and am well conversant with the facts of the case and able to swear to the present Affidavit.
2. I, on behalf of Respondent No. 1, Gujarat Urja Vikas Nigam Limited have gone through the contents of the accompanying Reply / Submission on behalf of Respondent No. 1 and say that the contents stated therein are based on the records of the Respondent No. 1 maintained in the normal course of business.

VERIFICATION:

I, the Respondent No. 1 above named do hereby verify that the contents of my above Affidavit are true to my knowledge, no part of it is false and nothing material has been concealed there from.

Identified before me.



Girija Dave

RESPONDENT NO. 1
GUJARAT URJA VIKAS NIGAM LIMITED

DATE : 15/7/2020
PLACE: VADODARA

Solemnly Affirmed / Declared
Sworn Before me by... *Girija Dave*

Bhavesh C. Vyas

BHAVESH C. VYAS
NOTARY (Govt. of Gujarat)

15-7-2020

