

**BEFORE THE HONORABLE GUJARAT ELECTRICITY REGULATORY
COMMISSION AT GANDHINAGAR**

Case No.

Filing No.

IN THE MATTER OF Petition under GERC (Procurement of Energy from Renewable Sources) Regulations, 2010 and amendments thereto for revision in Renewable Power Purchase Obligation (RPO) in case of four subsidiary Distribution Companies of GUVNL for FY 2020-21.

PETITIONER Gujarat Urja Vikas Nigam Limited
Sardar Patel Vidyut Bhavan
Race Course
Vadodara - 390 007

AND

CO-PETITIONERS 1. Madhya Gujarat Vij Company Ltd (MGVCL) Vadodara
2. Uttar Gujarat Vij Company Ltd (UGVCL) Mehsana
3. Paschim Gujarat Vij Company Ltd (PGVCL) Rajkot
4. Dakshin Gujarat Vij Company Ltd (DGVCL) Surat

MOST RESPECTFULLY SHOWETH

1.0 PREAMBLE

1.1 The erstwhile Gujarat Electricity Board has been unbundled into seven functional entities under the Gujarat Electricity Industry Reorganization and Comprehensive Transfer Scheme, 2003 notified under the Gujarat Electricity Industry (Reorganization and Regulation) Act 2003. The activities of generation, transmission, distribution, bulk power purchase and supply undertaken by erstwhile Gujarat Electricity Board (GEB) has been entrusted to separate seven functional entities. The generation activity is assigned to Gujarat State Electricity Corporation Ltd (GSECL), the transmission activity is assigned to Gujarat Energy Transmission Corporation Ltd (GETCO) and



the distribution activity is assigned to four Distribution companies viz. Uttar Gujarat Vij Company Ltd (UGVCL), Madhya Gujarat Vij Company Ltd (MGVCL), Dakshin Gujarat Vij Company Ltd (DGVCL) and Paschim Gujarat Vij Company Ltd. (PGVCL). Further, the function of bulk purchase and bulk sale of power is assigned to Gujarat Urja Vikas Nigam Ltd (GUVNL) as per the re-organization scheme.

1.2 Accordingly, on behalf of its four subsidiary Distribution Companies, GUVNL is carrying the activity of bulk purchase & bulk sale of power.

1.3 The Electricity Act (EA) 2003, National Electricity Policy (NEP) 2005 and Tariff Policy 2016 envisages promotion of Renewable Energy Sources and Co-generation based generation.

1.4 The following provisions of EA 2003 provide enabling legal framework for promotion of Renewable Energy Sources by the State Electricity Regulatory Commission (SERC).

- **Section 3 (1) of the EA 2003** requires the Central Government to formulate, National Electricity Policy in consultation with CEA and State Governments for inter alia, development of renewable sources of energy.
- **Section 61 (h) of the EA 2003** mandates SERCs to specify the terms and conditions for the determination of tariff bearing in mind the promotion of co-generation and generation of electricity from renewable sources of energy.
- **Section 86 (1) (e) of the EA 2003** mandates SERCs to promote co-generation and generation of electricity from Renewable Energy Sources.

1.5 In compliance with the provisions u/s 3 of the EA 2003, the Central Government has notified NEP 2005 and Tariff Policy 2016 elaborating the role of Regulatory Commissions, mechanism for promotion and harnessing of renewable sources of energy, time-frame for implementation, etc.



- Para 5.12 of the NEP 2005 recognizes the urgent need for promotion of generation of electricity from non-conventional and renewable sources of energy, being the most environment friendly.
- Para 4 (e) of the Tariff Policy provide for promotion of generation of electricity from Renewable Energy Sources.
- Para 6.4 (1) of the Tariff Policy provides for various aspects associated with promotion & harnessing of renewable sources of energy including fixation of minimum purchase of energy from RE sources as a percentage of total consumption of electricity in the area of a Distribution Licensee taking into account availability of such resources and its impact on retail tariffs.

The aforesaid Para 6.4 of the Tariff Policy also provides that the SERCs shall also reserve a minimum percentage for purchase of solar energy such that it reaches 8% of ***total consumption of energy, excluding Hydro Power***, by March 2022 or as notified by the Central Government from time to time.

- Further, Para 6.4 (2) of the Tariff Policy provides that States shall endeavour to procure power from renewable energy sources through Competitive Bidding Process to keep the tariff low, except from the waste to energy plants.

1.6 In consideration of above aspects, Hon'ble GERC through Notification dated 17.04.2010 had notified GERC (Procurement of energy from Renewable Energy sources) Regulations 2010 and subsequent Amendments through Notifications dated 04.03.2014 (1st Amendment Regulations) and 21.04.2018 (2nd Amendment Regulations). All these Regulations shall be hereinafter collectively referred as RPO Regulations.

- As per Regulation 4.1 of the RPO Regulations, each Distribution Licensee is required to purchase minimum stipulated percentage of the total consumption of its consumers including T&D losses during a year from RE sources.



- Further, as per **Para 2 of Regulation 4.1 of the RPO Regulations**, if the prescribed minimum quantum of power purchase either from solar or Wind or Others (including Biomass, Bagasse, MSW, etc.) is not available in a particular year, then in such cases, additional renewable energy available from solar or wind or other energy sources over and above the prescribed % shall be utilized towards fulfilment of the Renewable Power Purchase Obligation (RPO) in accordance with the total RPO% prescribed during the particular year.
- Furthermore, as per **Regulation 7.2**, a Distribution Licensee is liable to pay compensation (in accordance with Regulation 9), if it defaults / does not fulfill its stipulated RPO, despite availability of RE Sources.
- As per **Regulation 9 - “Consequences of Default”**, Hon’ble Commission may direct the defaulting Distribution Licensees to procure RECs from Power Exchange or deposit into a separate fund, an amount towards regulatory charges equivalent to forbearance price of RECs, in cases where the Distribution Licensee have defaulted in RPO Compliance despite availability of RE sources and/or RECs in the Market.

1.7The minimum percentages as prescribed by the Hon’ble Commission in the RPO regulations (and subsequent amendments) are tabulated below:-

Particulars	Year	RPO%	Non Solar		Solar
			Wind	Others	
RPO regulations, 2010	2010-11	5.00%	4.50%	0.25%	0.25%
	2011-12	6.00%	5.00%	0.50%	0.50%
	2012-13	7.00%	5.50%	0.50%	1.00%
1 st Amendment Regulations, 2014	2013-14	7.00%	5.50%	0.50%	1.00%
	2014-15	8.00%	6.25%	0.50%	1.25%
	2015-16	9.00%	7.00%	0.50%	1.50%
	2016-17	10.00%	7.75%	0.50%	1.75%
2 nd Amendment	2017-18	10.00%	7.75%	0.50%	1.75%
	2018-19	12.70%	7.95%	0.50%	4.25%



Regulations, 2018	2019-20	14.30%	8.05%	0.75%	5.50%
	2020-21	15.65%	8.15%	0.75%	6.75%
	2021-22	17.00%	8.25%	0.75%	8.00%

1.8 It is evident from the table above that initially Hon'ble GERC vide stipulating RPO Regulations had been specifying yearly RPO% in a gradual incremental manner but there was a steep and abrupt rise in RPO% notified in 2nd Amendment Regulations, 2018 on 21.04.2018 especially solar RPO%.

1.9 It is noteworthy that after knowing the prescribed RPO%, the Obligated Entities need at least 6 - 8 months' time to plan their capacity tie-up arrangements and implement tendering process for procurement of power from Wind and/or Solar Projects by floating tender(s), conducting pre-bid meeting(s), technical bid opening, financial bid opening & e-reverse auction and thereafter issue letters of award (LoA) & execute Power Purchase Agreements (PPAs) with the Successful Bidders. Thereafter, the Successful Bidders require 18 - 24 months' period to set up the Projects awarded to them.

1.10 Thus, inspite of making efforts for aggressive capacity tie-up, such sudden increase in RPO% cannot be complied by any Distribution Licensees, since capacity and generation therefrom would only be available after the lapse of almost two - three years.

2.0 SUBMISSION

2.1 Hon'ble Commission had been determining preferential tariff for procurement of power by Distribution Licensees from various Renewable Energy (RE) Sources for meeting of Renewable Power Purchase Obligation (RPO) from time to time. In order to meet the RPO of its Distribution Companies, GUVNL had been purchasing power from various RE Sources by entering into PPAs at the tariff determined by Hon'ble Commission.



2.2 Pursuant to the directives of Hon'ble Commission vide letter dated 18.03.2017 for procurement of power from Wind and Solar projects only through Competitive Bidding, GUVNL started procuring power from Wind and Solar PV Projects by conducting Competitive Bidding and by obtaining approval of Hon'ble Commission for adoption of tariff discovered thereunder.

2.3 Hon'ble GERC vide letter dated 12.07.2021 has stated that since FY 2020-21 is already over, it is necessary to monitor and verify the RPO Compliances of Obligated Entities / Licensees for FY 2020-21 and directed the Distribution Licensees to file Petition with necessary details / documents for RPO Compliance for FY 2020-21 as per the GERC (Conduct of Business) Regulations, 2004 and pay the requisite fees as per GERC (Fees, Fines and Charges), Regulations 2005.

2.4 Accordingly, by way of this present Petition, the GUVNL / DISCOMs hereby submit the status of RPO compliance for FY 2020-21, which is tabulated as under:

RPO Compliance for FY 2020-21	Solar	Wind	Others	Total
Actual Total Consumption (MUs)				93408
Less: Hydro Power Purchase (MUs)				1452
Actual Consumption excl. hydro (MUs)				91956
Target RPO% notified by Commission	6.75%	8.15%	0.75%	15.65%
Target RPO (MUs)	6207	7494	690	14391
Actual RE Purchase (MUs)	4455	7006	244	11704
Achieved RPO%	4.84%	7.62%	0.27%	12.73%
Shortfall (-) / Excess (+) (MUs)	-1752	-488	-446	-2687
Shortfall (-) / Excess (+) (%)	-1.91%	-0.53%	-0.48%	-2.92%

2.5 As regard to the Non-Solar RPO of FY 2020-21, it is to humbly submit that GUVNL / DISCOMs have purchased 7250 MUs non-solar energy i.e. 7.88% as against the requirement of 8184 MUs i.e. 8.90% stipulated non-solar RPO%.



2.6 As regard to the Solar RPO of FY 2020-21, GUVNL / DISCOMs have purchased 4455 MUs solar energy i.e. 4.84% against requirement of 6207 MUs to meet the stipulated solar RPO of 6.75%.

2.7 Thus, the net shortfall in compliance of total RPO compliance for FY 2020-21 is 2687 MUs i.e. 2.92%.

2.8 As regard to the shortfall in RPO Compliance during FY 2020-21, it is pertinent to submit the following before Hon'ble Commission:-

A. Constraints in availability of Renewable Energy / Inadequate capacity addition despite tie-up

- a) At the outset, it is to submit that GUVNL has undertaken Competitive Bidding Process through numerous Tenders for procurement of wind and solar power, since 2017. A detailed statement enlisting the Tenders invited by GUVNL for procurement of wind and solar power is enclosed herewith as **Annexure A**.

It is to humbly submit that GUVNL has been making consistent efforts towards promotion of RE and for meeting the increasing RPO targets by tying up RE Capacity through Competitive Bidding. However, there have been instances of delay in concluding tender(s) on account of reasons beyond control of GUVNL viz. extension in bid-deadlines based on Bidders requests, requirement of modifying Bid Security / Performance Bank Guarantees in the interest of Bidders' participation, etc. Besides, at certain times, GUVNL had to undergo scrapping of tenders and re-tendering process on account of reasons viz. discovery of higher tariffs, low participation / bid-submission by single bidder, requirement of modifying tender conditions in the interest of Bidders' participation & competition, etc. Of late, GUVNL had to undertake re-tendering for 700 MW Solar capacity to be set up at Dholera Solar Park and 100 MW at Raghanesda Solar Park. It is to submit that the aforesaid tendering process for procurement of 700 MW power has been challenged before APTEL and is stalled in wake of pendency of legal proceedings.



It is imperative to mention that a couple of Bidding Processes initiated by GUVNL have been deferred a number of times due to various reasons beyond control and factors not attributable to GUVNL. Had the same been concluded on time, GUVNL could have attained the benefit of additional generation from such procurement processes and helped mitigate RPO Compliance.

- b) It is to further highlight that MNRE vide its Office Memorandum had decided that a blanket extension of 5 months' time may be granted to all the RE Projects under implementation, on account of Force Majeure due to disruption in supply-chains and nationwide lockdown because of outbreak of Covid-19 pandemic. In light of the same, GUVNL had granted a time-extension of 5 month's period to several RE Projects under implementation viz. 15 no. of Solar Power Projects aggregating to 1900 MW capacity, 2 no. of Wind Projects aggregating to 140 MW capacity and 5 no. of MSW based Projects aggregating to 67.2 MW Projects. Resultantly, substantial capacity aggregating to **2107.2 MW** (1912.4 MW with SCoDs falling in FY 2020-21 and 194.8 MW in FY 2021-22) has been deferred. It is to highlight that the above mentioned Projects of 1912.4 MW capacity scheduled to get commissioned during FY 2020-21 could have entailed generation benefit of approx. **1586 MUs** (considering their contracted CUF% or normative CUF% as the case may be), which GUVNL was deprived of, in wake of the time-extension relief granted to abovementioned Projects on account of Force Majeure event of unforeseen outbreak of Covid-19 pandemic.
- c) Moreover, it is to further submit that inspite of tying up capacity with certain RE Projects as mentioned herein below, GUVNL could not avail the anticipated generation on account of factors solely attributable to such RE Generators.

→ GUVNL had signed PPAs with the Bagasse based Co-Generation Projects (viz. 60.2 MW Project with Nitash Co-Generation Pvt Ltd and 16.8 MW Project with Vasu Bioenergy Pvt) which were not set up by the Project Developers, which otherwise could have contributed to an additional generation of **472 MUs** (@



normative CUF of 70%) and helped in RPO Compliance of GUVNL / DISCOMs.

- The SCoD of M/s Cargo Power & Infrastructure Pvt Ltd's 25 MW Solar Thermal Project has been extended by Hon'ble Commission time and again. Timely execution of the Project could have entailed generation benefit of **42 MUs** (@ normative CUF of 19%) and helped in RPO Compliance of GUVNL / DISCOMs.
- Some of the PPAs executed by GUVNL for Waste to Energy (Municipal Solid Waste based) Projects have not been developed by the Project Developers and hence terminated by GUVNL on account of default on their part. Execution of 11.5 MW Project of RGE Surat Pvt Ltd could have entailed generation benefit of **86 MUs** (@ contracted PLF of 85%) and 4 MW Project of Junagadh WTE Pvt Ltd could have benefitted generation of **28 MUs** (@ normative PLF of 80%). Thus, these Projects could have attained generation of **114 MUs** and helped in RPO Compliance of GUVNL / DISCOMs.
- GUVNL was constrained to terminate a 30 MW Wind Project executed through Competitive Bidding (Phase-I) on account of default on part of the Wind Developer viz. M/s Evergreen Mahuva Windfarms Pvt Ltd, which could have otherwise added generation of **65 MUs** (@ normative CUF of 24.5%).
- There were also instances of delayed commissioning (even after giving 5 months' extension on account of Force Majeure of COVID-19). Had the same been commissioned as per their revised SCODs i.e. not been delayed by the Generators, GUVNL could have availed generation benefit from the same. It is to submit that GUVNL could have at least availed generation benefit aggregating to **63.4 MUs** (considering normative generation @ 65% PLF from the 14.9 capacity of M/s Goodwatts WTE Ahmedabad Pvt Ltd & 7.5 MW capacity of M/s Goodwatts WTE Jamnagar Pvt Ltd were delayed beyond their Revised SCoDs of 31.08.2020 & 30.11.2020 respectively) and



8.6 MUs from M/s Avaada Sunrise Energy Pvt Ltd (225 MW capacity was delayed beyond their Revised SCOD of 21.03.2021). Thus, GUVNL was deprived of aggregate generation of **72 MUs** which could have otherwise contributed in the RPO Compliance of GUVNL / DISCOMs.

→ To sum up, it is to humbly submit that GUVNL has remained deprived from the generation benefit equivalent to **764 MUs** from the abovementioned Projects solely on account of reasons attributable to the RE Generators. The above generation could have otherwise helped mitigate RPO Compliance of GUVNL / DISCOMs.

- d) Thus from the above, it can be perceived that there was non-availability of about **2350 MUs** on account of inadequate capacity addition / supply constraints in availability of RE sources, on account of reasons beyond control of GUVNL.

B. Actual RE generation below normative generation

- a) It is to submit that the 3 Biomass Based Projects (aggregating to 30 MW capacity) have completely stopped generating power since Aug-2020, in wake of dispute / litigation with regard to non-operation of Projects as per Grid Code. It is to further submit that generation from these Projects during FY 2020-21 was hardly 52.7 MUs i.e. PLF of 20.07 % against the normative PLF of 80% which could have entailed generation of 210.24 MUs (shortfall of approx. **158 MUs**).
- b) It is to further submit that the overall wind generation during FY 2020-21 was significantly low, impacting the overall / yearly RPO Compliance. It is to point out that, the average CUF% attained during FY 2020-21 by the Wind Projects was **17.77%**.

Particulars	GUVNL PPAs	Wheeling Agreements / Others	Total
Capacity (MW) (as on 31.03.2021)	4221	2204	6425
Generation (MUs) (FY 2020-21)	6809	3192	10001
CUF%	18.41%	16.53%	17.77%

(Source: SLDC's SEAs & Wind Energy Certificates)



It is to highlight that there is substantially big difference between the actual CUF% and normative CUF% of 24.5% (as recognized by Hon'ble Commission in their Tariff Order), which has led to an overall wind deficit of **more than 2000 MUs** during the year FY 2020-21.

- c) From the above, it is clearly evident that there was substantial shortfall on account of under-operationalization of RE Projects.

C. Efforts made by GUVNL towards RPO Compliance

- a) GUVNL has been proactively promoting RE Sources since inception of the first Solar Power Policy notified by Govt. of Gujarat in 2009 when the concept of solar energy and solar technology was at nascent stage of development in India as a whole and was not considered to be a proven technology for power generation in comparison to other RE sources like Wind, Small Hydel, Biomass, etc. Since then, GUVNL has been making all-out efforts towards using non-conventional energy sources for surmounting the issues of carbon emissions and its related impacts on climatic change.
- b) Pursuant to the GoG Solar Power Policy 2009, GUVNL had tied up 886 MW capacity (out of which 861 MW capacity has been available to GUVNL since FY 2011-12 to meet the Solar RPO, while commissioning schedule of 25 MW capacity of M/s Cargo has been extended by Commission / delayed inordinately).
- c) Taking into consideration the increasing trend of Solar RPO during ensuing years, GUVNL tied up 250 MW capacity in 2017 under SECI's Competitive Bidding under Phase -II, Batch- IV of Jawaharlal Nehru National Solar Mission (JNNSM) of Government of India.
- d) Thereafter, since FY 2017-18, GUVNL has been persistently undertaking tendering processes and aggressively tying up RE Power to meet the increasing RPO targets. GUVNL tied up 4550 MW RE power - comprising of 700 MW Wind power and 3850 MW Solar



Power (2850 Non-Park based & 1000 MW Park based) through Competitive Bidding.

- e) Further, DISCOMs have recently tied-up about 949 MW capacity under the GoG’s Policy for development of Small Scale Distributed Solar Projects, generation benefit of which would be available in / after FY 2022-23.
- f) Moreover, GUVNL envisages procurement of solar power from GSECL under GoG’s policy for allocation of revenue wasteland on token rate in the vicinity of existing GETCO sub-stations.
- g) Furthermore, GUVNL envisages buying power from some of the Hybrid Projects to be developed at the Khavda RE Park.
- h) The present RE Capacity tied up by GUVNL is as under:-

Source	Capacity (MW) tied up as on 31.10.2021
Wind [#] (incl. REC PPAs)	4318
Solar [*]	4987
Biomass	30
Small Hydrel	21
Municipal Solid Waste	67
Total	9423

[#] Excludes capacity of 30 MW of a terminated Wind PPA
^{*}Another approx. 949 MW Solar capacity recently tied up by DISCOMs under GoG’s Policy for Small Scale Distributed Solar Projects.

- i) From the above, it is evident that GUVNL / DISCOMs have added substantial RE Capacity. Hon’ble Commission is therefore humbly requested to recognize that GUVNL / DISCOMs have been making all possible efforts exercising commercial prudence towards promotion of renewable energy and compliance of RPO Obligation of GUVNL / DISCOMs.

2.9 As enumerated hereinabove, it is to humbly submit that the cumulative effect of the following factors have severely affected the RPO Compliance of GUVNL / DISCOMs.



→ Constraints in availability of renewable energy / Inadequate capacity addition (Impacting RE purchase of 2350 MUs)

→ Under-Operation of RE Plants / Actual RE generation below normative generation (Impacting RE purchase of 2228 MUs)

It is to humbly submit that the above factors were beyond the control of GUVNL / Distribution Companies and there has been no willful default or failure on the part of GUVNL / Distribution Companies for shortfall in compliance of RPO for FY 2020-21.

2.10 It is also to humbly submit that the Regulation 4.2 of RPO Regulations empower Hon'ble Commission for revising the RPO targets in case of supply constraints or factors beyond control of the concerned distribution licensee. Under the RPO Regulations, Hon'ble Commission has the inherent power to give relaxation as may be deemed necessary in the scenario of non-availability of RE Sources and/or RECs or non-compliance of RPO due to genuine difficulty and factors not attributable to the distribution licensee.

2.11 It is also to humbly submit that Hon'ble APTEL has made explicitly clear that State Commission can revise the RPO before or during a year or after passing of year under Regulation 4.2 of RPO Regulations ensuring that such revision does not defeat the object of the EA 2003 and the Regulations. Furthermore, Hon'ble APTEL has held that the State Commission is empowered to revise the RPO Targets specified under Regulations due to inadequate Renewable Capacity Addition in the State and reasons beyond control of Distribution Licensee irrespective of the fact that whether Renewable Energy Certificate (RECs) are available or not.

The relevant extract from APTEL's Judgment is reproduced herein below:-



51. We want to add that non-availability of REC may not always be a pre-condition for exercise of power to revise under Regulation 4.2. For Example, if the distribution licensees had tied up adequate capacity at preferential tariff but due to actual generation being lower than the normative generation due to reasons beyond the control of the distribution licensee or there is natural calamity in the State and energy consumption in the State has gone down or renewable energy generation in the State has been affected due to natural calamity then shortage of REC may not be a pre-condition to revise RPO targets set up under Regulation 4.1. Further, if in a resource rich State the State Commission has set up RPO targets keeping in view anticipation of capacity addition in the State, the State Commission may also revise the targets due to inadequate capacity addition in the State due to reasons beyond the control of the distribution licensee.

2.12 It is also to humbly submit that Hon'ble Commission in their various Orders have acknowledged the fact that purchase of RECs by Distribution Licensees / Obligated Entities needs to be considered keeping in view various factors and its impact on the consumer tariff. Hon'ble Commission has rightly acknowledged that unnecessary purchase of RECs results in increase in the cost of power purchase of the Obligated Entities without any increase in the physical component of electricity purchased and leads to financial burden on the end consumers of the State.

2.13 In view of above and as submitted in the foregoing paras, considering the genuine difficulty arising on account of constraints in availability of renewable energy / inadequate capacity addition / time-extension granted to various RE Projects due to unforeseen outbreak of Covid-19 pandemic / factors not attributable to GUVNL, Hon'ble Commission is humbly requested to kindly exercise their power under Regulation 4.2 and revise the RPO targets for FY 2020-21 as per actual RPO compliance of GUVNL / DISCOMs.



- 2.14 It is to further submit that as per Regulation 7.2, the Regulation 9 “Consequences of Default” can be invoked in case a Distribution Licensee fails to meet the RPO, despite availability of renewable energy sources. Thus, Regulation 7.2 which is the pre-condition for invocation of Regulation 9 is not applicable in the present case, in light of the constraints / non-availability of renewable energy as enumerated in foregoing para(s) hereinabove.
- 2.15 Furthermore, it is to humbly submit that invocation of Regulation 9 and levy of regulatory charge shall put unwarranted burden on GUVNL / Distribution Companies and eventually on the end-consumers of the State.
- 2.16 It is pertinent to mention that the preamble of EA 2003, NEP 2005 and Tariff Policy 2006 & Amendments thereto lay emphasis on both promotion of renewable energy as well as safeguarding the interest of the consumers. It is also to highlight that Section 61 (d) of the EA 2003 read with objectives of the EA 2003 and para 4 of the Tariff Policy mandates the Hon'ble Commission to safeguard consumers' interest. The para 6.4 (1) of the Tariff Policy expressly provides that RPO targets shall be fixed by an Appropriate Commissions *inter alia* considering its impact on retail tariff. Accordingly, it is imperative that RE cannot be promoted in disregard to the consumers' interests. It is a settled principle of law that while discharging its functions, the Hon'ble Commission is required to balance the interests of all stakeholders.
- 2.17 In the above background, Hon'ble Commission is humbly requested not to invoke Regulation 9 and exempt GUVNL / DISCOMs from consequences thereof by waiving off the shortfall in RPO Compliance of GUVNL / DISCOMs for FY 2020-21 and exercise their powers vested under Regulation 4.2 by revising the RPO Targets as per Actual RPO achieved by GUVNL / DISCOMs for FY 2020-21.



3.0 PRAYER:

The Petitioner hereby most respectfully submits and prays as under:-

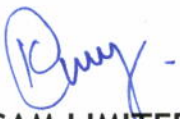
- i. Hon'ble Commission may kindly exercise their inherent power and give relaxation from the consequences of Regulation 9 by waiving-off the shortfall in RPO Compliance of GUVNL / DISCOMs for FY 2020-21, the same being due to genuine difficulty arising on account of non-availability of renewable energy, inadequate capacity addition, under-operationalization of RE Plants, time-extension granted to various RE Projects due to unforeseen outbreak of Covid-19 pandemic and factors not attributable to GUVNL / Distribution Companies.
- ii. Hon'ble Commission may kindly exercise their powers under Regulation 4.2 and revise the RPO percentage targets as per Actuals, in light of the constraints in renewable energy and other factors beyond control of GUVNL / Distribution Companies.
- iii. Pass any other order which Hon'ble Commission may deem fit.


GUJARAT URJA VIKAS NIGAM LIMITED
- PETITIONER

DECLARATION



Declaration that the subject matter of present Petition has not been raised by the Petitioner before any other competent forum and that no other competent forum is currently seized of the matter or has passed any order in relation thereto.


GUJARAT URJA VIKAS NIGAM LIMITED
- PETITIONER



DATE : 24-12-2021

PLACE: VADODARA



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PETITIONER Gujarat Urja Vikas Nigam Limited
Sardar Patel Vidyut Bhavan
Race Course,
Vadodara - 390 007

AND

Others

Sr. No. 27337
Date 24/12/2021



AFFIDAVIT

I, Kandarp Mistry, son of Bhupeshkumar Mistry, aged about 34 years resident of Vadodara do hereby solemnly affirm and state as under:

1. I am the Deputy Engineer 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 the Petitioner, Gujarat Urja Vikas Nigam Limited have gone through the contents of the accompanying Petition and say that the contents stated therein are based on the records of the Petitioner maintained in the normal course of business and the same are true to the best of my knowledge.

VERIFICATION:

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

Identified before me.

Gujarat Urja Vikas Nigam Limited

PETITIONER

Date: 24-12-2021

Place: Vadodara

My Commission Expires
on 04/07/2023



Solemnly Affirmed/Declared
Sworn Before me by.....

H. J. ZALA
NOTARY (Govt. of India)

ANNEXURE - A

Details of tenders undertaken by GUVNL for procurement of power from wind and solar projects depicting efforts made by GUVNL

Sr. No.	Tender Advertised			Bids received		e-RA date	Tied-up Capacity (MW)	Details
	Particulars	Date of Tender	Tender Capacity (MW)	Nos. Received	Capacity (MW)			
1	Solar (Phase I)	15.06.2017	500	24	3675	19.09.2017	500	PPAs signed for 500 MW at Rs. 2.65 - 2.67 per unit
2	Wind (Phase I)	15.06.2017	500	18	2119.8	20.12.2017	500	PPAs signed for 500 MW at Rs. 2.43 - 2.45 per unit; 470 Commissioned; 30 MW Terminated
3	Solar (Phase II)	08.02.2018	500 + 500 G.S.	11	1590	28.03.2018	-	Tariffs in the range of Rs. 2.98 - 3.06 per unit; Scrapped & retendered in wake of high tariffs
4	Wind (Phase II)	23.02.2018	500 + 500 G.S.	Scrapped and re-tendered after incorporating modifications				
5	Solar (Phase II-R)	28.06.2018	500	13	1975	17.09.2018	500	PPAs signed for 500 MW at Rs. 2.44 per unit
6	Solar (Phase III) Raghnesda	28.09.2018	700	7	1750	21.12.2018	-	Tariffs in the range of Rs. 2.84 - 2.89 per unit; Scrapped & retendered
7	Solar (Phase IV)	29.12.2018	500	7	1045	14.02.2019	500	PPAs signed for 500 MW at Rs. 2.55 - 2.68 per unit
8	Solar (Phase III-R) Raghnesda	06.03.2019	700	4	600	13.05.2019	500	PPAs signed for 500 MW at Rs. 2.65 - 2.70 per unit; retendered for 200 MW
9	Solar (Phase V) Dholera	16.01.2019	1000	2	300	13.05.2019	250	PPAs signed for 250 MW at Rs. 2.75 per unit; retendered for 750 MW
10	Wind (Phase II-R)	01.03.2019	1000	8	931.4	13.05.2019	202.6	PPAs signed for 202.6 MW (190.6 MW at Rs. 2.80 per unit; and 12 MW CPSU at Rs. 2.43 per unit)
11	Solar (Phase VI) Raghnesda	24.06.2019	200	1	100	16.08.2019	100	PPA signed for 100 MW at Rs. 2.65 per unit
12	Solar (Phase VII) Dholera	24.06.2019	750	1	50	16.08.2019	50	PPAs signed for 50 MW at Rs. 2.75 per unit
13	Solar (Phase VIII)	07.02.2020	500	3	430	18.03.2020	350	PPAs signed for 350 MW at Rs. 2.61 - 2.64 per unit
14	Solar (Phase IX) Dholera	18.03.2020	700	7	700	13.08.2020	-	Tariffs in the range of Rs. 2.78 - 2.81 per unit; Retendered in wake of high tariffs (compared to Rs. 1.99)
15	Solar (Phase X) Raghnesda	15.07.2020	100	1	100	24.08.2020	-	Single Bid received; Scrapped & retendered (higher tariff compared to Rs. 1.99)
16	Solar (Phase XI)	28.09.2020	500	17	3455	19.12.2020	500	PPAs signed at Rs. 1.99 per unit
17	Solar (Phase XII)	23.01.2021	500	9	1010	22.03.2021	500	PPAs signed at Rs. 2.20 - 2.21 per unit
18	Solar (Phase X-R) Raghnesda	15.03.2021	100	1	300	07.05.2021	100	LoA issued at Rs. 2.64 per unit
19	Solar (Phase IX-R) Dholera	15.03.2021	700	Challenged before APTEL by some of the Solar Project Developers; Status-Quo Order by APTEL				
Total							4552.6	

**BEFORE THE HONORABLE GUJARAT ELECTRICITY REGULATORY COMMISSION
AT GANDHINAGAR**

Case No. Petition No. 2042 / 2022

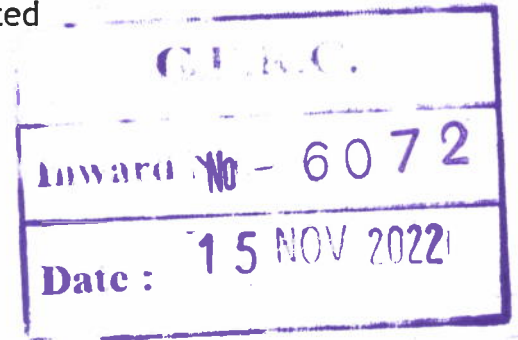
Filing No.

*AD (Legal) / Ex (Legal)
Put in relevant files
15/11/2022*

IN THE MATTER OF Petition under GERC (Procurement of Energy from Renewable Sources) Regulations, 2010 and amendments thereto for revision in Renewable Power Purchase Obligation (RPO) in case of four subsidiary Distribution Companies of GUVNL for FY 2020-21.

PETITIONER

Gujarat Urja Vikas Nigam Limited
Sardar Patel Vidyut Bhavan
Race Course
Vadodara - 390 007



AND

CO-PETITIONERS

1. Madhya Gujarat Vij Company Ltd (MGVCL) Vadodara
2. Uttar Gujarat Vij Company Ltd (UGVCL) Mehsana
3. Paschim Gujarat Vij Company Ltd (PGVCL) Rajkot
4. Dakshin Gujarat Vij Company Ltd (DGVCL) Surat

Submission in Compliance of Hon'ble Commission's directives vide Oral Order dated 21.10.2022:

- 1) In pursuance with Hon'ble Commission's directives vide Oral Order dated 21.10.2022, the Petitioner has issued Public Notices in two daily Gujarati Newspapers and one English Newspaper having wide circulation in the State / National level stating that GUVNL has filed Petition No. 2042 / 2022 before GERC for revision in Renewable Power Purchase Obligation (RPO) in case of four subsidiary Distribution companies of GUVNL for FY 2020-21 and that stakeholders are required to file their comments / suggestions in the Petition to the Secretary of the Commission in five copies alongwith affidavit in support of their submissions within 30 days from the date of issuance of the Public Notice.



- 2) A copy of Public Notice(s) published in two daily Gujarati Newspapers viz. Gujarat Samachar and Divya Bhaskar and one English Newspaper viz. Indian Express on 04.11.2022 is annexed herewith as Annexure A.
- 3) Further, the Petitioner has also uploaded the present Petition in the Notice Section of its website www.guvnl.com to enable the interested Stakeholders to download it and file their comments / suggestions to the Petition, if any.



Kub
12-11-22

GUJARAT URJA VIKAS NIGAM LIMITED

- PETITIONER

DATE : 12.11.2022

PLACE: VADODARA



**BEFORE THE GUJARAT ELECTRICITY REGULATORY COMMISSION
AT GANDHINAGAR**

PETITION NO. 2042 / 2022

IN THE MATTER OF:

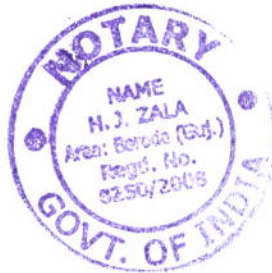
Petition under GERC (Procurement of Energy from Renewable Sources) Regulations, 2010 and amendments thereto for revision in Renewable Power Purchase Obligation (RPO) in case of four subsidiary Distribution Companies of GUVNL for FY 2020-21.

AFFIDAVIT

Sr. No. 22126
Date: 12/11/2022

I, Kishor Lakhani, aged about 34 years, resident of Vadodara, do hereby solemnly affirm and state as under:

1. I say that I am Junior Engineer in GUVNL and am competent to swear the present affidavit.
2. I say that I have read the contents of the above compliances and I have understood the contents of the same.
3. I say that the above contents of compliance are based on the information available with the Company of Respondent in the normal course of business and believed by me to be true.



DEPONENT

VERIFICATION

I, the deponent above-named, do hereby verify the contents of the above affidavit to be true to the best of my knowledge, no part of it is false and nothing material has been concealed therefrom.

Verified at Vadodara on this 12th day of November, 2022



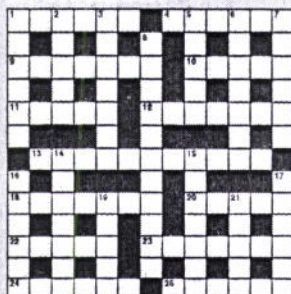
DEPONENT

My Commission Expires
on 04/07/2023

Solemnly Affirmed/Declared
Sworn Before me by Kishor Lakhani
H. J. ZALA
NOTARY (Govt. of India)



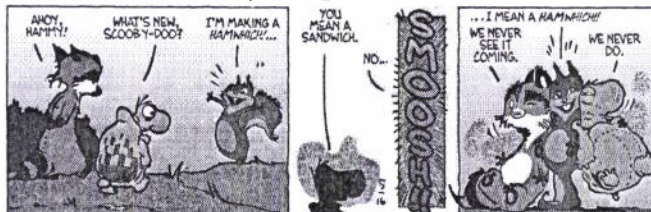
CROSSWORD 489D



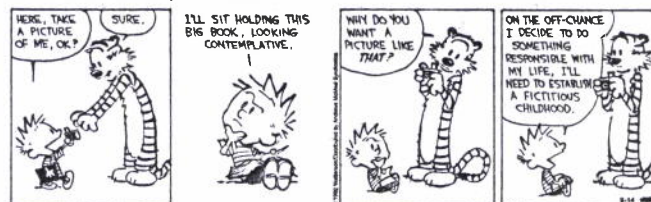
- ACROSS**
- Show the flag (16)
 - Bargain has nothing on (8)
 - Person who is under the law (7)
 - One free medical attention (7)
 - Incited on the last day (5)
 - Mad rage can lead to slaughter (7)
 - Competent crew driving golfers' behaviour (4,7)
 - Letters to be mailed to a person's address (11)
 - Plaster doing a job that could be worse (13)
 - Doctor visits treating eyes (10)
 - As a learner of the law (5)
 - Knock out some facts about an animal (6)
 - Their function is to secure quiet in class (6)
- DOWN**
- Thing can be very difficult (6)
 - Decline to meet a companion (5)
 - Went round to put a name on the seal (7)
 - Take put to very good use (5)
 - Outdoor writer bursting into love song (4,3)
 - Little Margaret is after fruit and spices (8)
 - It's clear-cut as a decisive trial (7,4)
 - Determined to see what the future holds (7)
 - It's a job anchor for a brother (10)
 - Being wealthy was charged (6)
 - New deserters are not charged (6)
 - A charge on collection (5)
 - Expresses respect in a little gesture (5)

Solutions Crossword 489D: Across: (1) India, (2) Bargain, (3) Person, (4) One, (5) Mad, (6) Slaughter, (7) Competent, (8) Letters, (9) Plaster, (10) Doctor, (11) As, (12) Knock, (13) Their, (14) Quiet, (15) Show, (16) Flag, (17) Incited, (18) Letters, (19) Plaster, (20) Doctor, (21) As.

OVER THE HEDGE by Michael Fry & T Lewis



CALVIN & HOBBS by Bill Watterson



MARVIN by Tom Armstrong



JUMBLED WORDS

Given below are four jumbled words. Solve the jumble to make proper words and move them to the answer line given below. Select the letter in the shaded squares and jumble them together to form the new words.

If you are struggling, look at the answer line given below.

DFAR **OWBWW**
ETOR **CEOPKK**

SUDOKU 5008

Difficulty Level 2s

To solve a Sudoku puzzle, every digit from 1 to 9 must appear in each of the nine vertical columns, in each of the nine horizontal rows, and in each of the nine 3x3 sub-grids.

Difficulty Level 1s

1s to 2s: 2s to 3s: 3s to 4s: 4s to 5s: 5s to 6s: 6s to 7s: 7s to 8s: 8s to 9s: 9s to 10s: 10s to 11s: 11s to 12s: 12s to 13s: 13s to 14s: 14s to 15s: 15s to 16s: 16s to 17s: 17s to 18s: 18s to 19s: 19s to 20s: 20s to 21s: 21s to 22s: 22s to 23s: 23s to 24s: 24s to 25s: 25s to 26s: 26s to 27s: 27s to 28s: 28s to 29s: 29s to 30s: 30s to 31s: 31s to 32s: 32s to 33s: 33s to 34s: 34s to 35s: 35s to 36s: 36s to 37s: 37s to 38s: 38s to 39s: 39s to 40s: 40s to 41s: 41s to 42s: 42s to 43s: 43s to 44s: 44s to 45s: 45s to 46s: 46s to 47s: 47s to 48s: 48s to 49s: 49s to 50s: 50s to 51s: 51s to 52s: 52s to 53s: 53s to 54s: 54s to 55s: 55s to 56s: 56s to 57s: 57s to 58s: 58s to 59s: 59s to 60s: 60s to 61s: 61s to 62s: 62s to 63s: 63s to 64s: 64s to 65s: 65s to 66s: 66s to 67s: 67s to 68s: 68s to 69s: 69s to 70s: 70s to 71s: 71s to 72s: 72s to 73s: 73s to 74s: 74s to 75s: 75s to 76s: 76s to 77s: 77s to 78s: 78s to 79s: 79s to 80s: 80s to 81s: 81s to 82s: 82s to 83s: 83s to 84s: 84s to 85s: 85s to 86s: 86s to 87s: 87s to 88s: 88s to 89s: 89s to 90s: 90s to 91s: 91s to 92s: 92s to 93s: 93s to 94s: 94s to 95s: 95s to 96s: 96s to 97s: 97s to 98s: 98s to 99s: 99s to 100s: 100s to 101s: 101s to 102s: 102s to 103s: 103s to 104s: 104s to 105s: 105s to 106s: 106s to 107s: 107s to 108s: 108s to 109s: 109s to 110s: 110s to 111s: 111s to 112s: 112s to 113s: 113s to 114s: 114s to 115s: 115s to 116s: 116s to 117s: 117s to 118s: 118s to 119s: 119s to 120s: 120s to 121s: 121s to 122s: 122s to 123s: 123s to 124s: 124s to 125s: 125s to 126s: 126s to 127s: 127s to 128s: 128s to 129s: 129s to 130s: 130s to 131s: 131s to 132s: 132s to 133s: 133s to 134s: 134s to 135s: 135s to 136s: 136s to 137s: 137s to 138s: 138s to 139s: 139s to 140s: 140s to 141s: 141s to 142s: 142s to 143s: 143s to 144s: 144s to 145s: 145s to 146s: 146s to 147s: 147s to 148s: 148s to 149s: 149s to 150s: 150s to 151s: 151s to 152s: 152s to 153s: 153s to 154s: 154s to 155s: 155s to 156s: 156s to 157s: 157s to 158s: 158s to 159s: 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