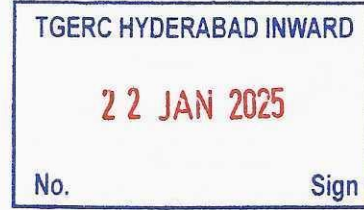


Letter No. ISPL/TGSPDCL/2025-01-001
20.01.2025

date:

To
Commission Secretary
Telangana Electricity Regulatory Commission,
Vidyut Niyantaran Bhavan, GTS colony
Kalyan Nagar
Hyderabad-500045



Subject: Submission of objections regarding proposed Amendment to Solar PPAs sought by Southern Power Distribution Company of Telangana Limited

Ref: Your notice D. No 843 received on 03-01-2025 addressed to International Solar Corporation Private Limited ("Notice")

Dear Sir,

With reference to your Notice, we herewith submit our objections to the amendment proposed by TGSPDCL as detailed below:

S. No.	Article	Existing	Amended	Remarks/Objections
1.	2.6	<p>The Solar Power Developer is entitled to draw the power from the DISCOM for its auxiliary consumption, subject to limit as specified in Schedule-1. The energy supplied by the DISCOM to the Solar Power Developer through a bilateral arrangement, to maintain the Auxiliaries of the power plant in situations of non-generation of power, in any billing month shall be adjusted from the delivered energy, as indicated below:</p> <p>Net Energy= Delivered energy by the developer at interconnection point Energy drawl from DISCOM for auxiliaries.</p>	<p>The Solar Power Developer is entitled to draw the power from the DISCOM for its auxiliary consumption, subject to limit as specified in Schedule-1. The energy supplied by the DISCOM to the Solar Power Developer through a bilateral arrangement, to maintain the auxiliaries of the power plant in situations of non-generation of power, shall be adjusted as indicated below:</p> <p>Net Energy = Delivered energy by the project at interconnection point-Energy drawl from DISCOM for auxiliaries*</p> <p>*Here, Energy drawl from DISCOM for Auxiliary</p>	<p>Given fixed tariff for 25 years was calculated based on the existing PPA clause for adjusting all imports from delivered energy at quoted tariff.</p> <p>Hence, demanding payments for imported energy on the basis HT-1 billing i.e on KVAh would lead to extra cost on the generator company as the same was not accounted for in the fixed PPA tariff.</p> <p>The imported power is being utilized for the following reasons which are beyond the control of the generator:</p>

INTERNATIONAL SOLAR CORPORATION PRIVATE LIMITED

Registered Address: 605, Sixth Floor Manjusha Building 57 Nehru Place Delhi 110019 IN|
Communication Address: 8-2-610/68/1, 2, 3, 5th Floor, Accord Blu, Road No. 10, Banjara Hills, Hyderabad – 500034 |
CIN: U40300DL2010PTC207399 | Ph: 91-40-41205300 | Email: infoindia@enfinity.global |

		<p>Provided that where there is NO Delivered Energy by the SPD at the Interconnection Point in any month, then Energy drawl from the DISCOM shall be billed at the applicable tariff of HT-1 category consumers.</p> <p>Provided further that the Solar plants during the plant shut down or non-generation periods shall draw the energy from the DISCOM only for the essential loads not exceeding the auxiliary consumption.</p>	<p>consumption as specified in Schedule 1 of this Agreement.</p> <p>Provided that where the consumption drawn from the DISCOM is over and above the auxiliary limit specified in Schedule 1 of this Agreement, such excess consumption shall be billed on KVAh basis at the applicable tariff of HT-1 category consumers as notified by the TGERC for the relevant financial year.</p> <p>Provided further that during the plant shut down or non-generation periods, the project shall draw the energy from the DISCOM only for the essential loads not exceeding the auxiliary consumption limit as specified in Schedule 1 of this Agreement.</p> <p>Provided that where there is NO Delivery Energy by the SPD at the Interconnection Point in any month, then Energy drawl from the DISCOM shall be billed on KVAh basis at the applicable tariff of HT-1 category consumers as notified by the TGERC for the relevant financial year.</p>	<ul style="list-style-type: none"> • We import Auxiliary power during night to meet our plant auxiliary loads like Keeping up SLDC communication, SCADA, plant protection system. • During Winter months the auxiliary consumption generally goes up due to low generation hours as the daytime is shorter than the night time. • The Power factor variations and reactive power are due to grid issues and not attributable to us and beyond our control. • We are compelled to import power during daytime sometimes due to problems from Grid and departmental restrictions beyond our control. • We are importing power only for lighting and for maintaining Auxiliary and Communication system to SLDC during night and during plant shut down due to unavoidable like faults by grid and grid induced breakdowns and force majeure condition beyond our control.
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				<ul style="list-style-type: none">• SLDC has been asking to maintain communication on round the clock basis <p>We do not agree with TGSPDCL proposal for penalizing us by imposing HT tariffs for grid induced issues of power factor and reactive power and KVAh based billing.</p> <p>We have been successful and trying our best in limiting our consumption within the permissible limits as per PPA.</p>
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Thanking you

Yours Sincerely,

For **International Solar Corporation Private Limited**


Authorised Signatory



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