

TGERC HYDERABAD INWARD

- 5 FEB 2025

No.

Sign



Mahabubnagar Solar Parks Private Limited
CIN: U40106HR2013PTC118850
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Ref: MSPPL/TGERC/10MW/PPA amndt./24-25/01

date: 05.02.2025

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

Sub: Comments on TGDISCOMs proposal before TGERC for amendment to the solar model PPA for billing of imported energy from the grid by solar power developers.

Ref:

1. Telangana Electricity Regulatory Commission Notice in O.P. No. 33 of 2024, Ref No. D.No.-843.
2. TGERC document, Ref No. 2817322/2024/COMMISSION SECRETARY-TGERC.
3. PPA No 0168/2014 dated 17th June 2014 between Southern Power Distribution Company of Telangana Limited (TGSPDCL) and Mahabubnagar Solar Parks Pvt Ltd and subsequent amendments

Dear Sir,

1. This is in reference to the above stated notice issued by Telangana Electricity Regulatory Commission ("TGERC") inviting suggestions, objections, and comments regarding the proposals submitted by TGDISCOMs, specifically Southern Power Distribution Company of Telangana Limited (TGSPDCL) and Northern Power Distribution Company of Telangana Limited (TGNPDCL). These proposals are unilateral in nature and seek TGERC's consent to amend the clause in the model PPA in respect of billing of imported energy from the grid by solar power developers to maintain their auxiliaries during the non-generation period.
2. It is hereby submitted that the comments/objections are being filed by Mahabubnagar Solar Parks Private Limited ("MSPPL"). MSPPL entered PPA with TSSPDCL on 17.06.2014 for supply of 10 MW solar power ("PPA") and has been supplying solar power to Southern Power Distribution Company of Telangana Limited (TGSPDCL).

With reference to your notice letter no. 843 cited in reference above, we herewith submit our difficulties and objections to the proposed amendment by TGSPDCL as below:

- a) We are importing power only for lighting and for maintaining DC and Communication system to SLDC during night and during plant shut down due to unavoidable faults by grid and grid induced breakdowns and force majeure condition beyond our control

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- b) SLDC has been asking to maintain communication on a round-the clock basis
- c) We have been successful and are trying our best to limit our consumption within the permissible limits as per PPA.
- d) We are compelled to import power during daytime sometimes due to problems from Grid and departmental restrictions beyond our control
- e) The Power factor variations and reactive power are due to grid issues and not attributable to us and beyond our control
- f) 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 KVA based billing. If the same is approved, it will have direct adverse commercial impact on the existing projects as the same was not anticipated at the time of bidding and not included in model PPA that was approved by the Commission.
- g) We have quoted fixed tariff for 20 years based on clause for adjusting all imports from delivered energy at quoted tariff only.
- h) It is the trite law that once the PPA has been approved and the same is not challenged, the same cannot be amended retrospectively.

It is therefore requested not to consider the amendment proposal of TGSPDCL for penalizing us with HT charges due to reasons not attributable to us as explained above and maintain status quo with present PPA as we have quoted our tariff for 20 years based on KWH based billing only and all imports are adjusted from delivered energy with quoted and we did not factor HT rates penalization in our tariff.

Yours faithfully

For **Mahabubnagar Solar Parks Private Limited**




Tanmay Saha

Authorised signatory