

Date: 20.01.2025

To
The Commission Secretary,
Telangana Electricity Regulatory Commission,
Vidyut Niyantran Bhavan, G.T.S. Colony,
Kalyan Nagar, Hyderabad, 500 045.

Subject: Comments on proposal by TGDISCOM (TGSPDCL & TGNPDCL) on Amendment of model Solar PPA

Reference: TSERC notice on OP 33 of 2024.

Dear Sir/ Madam,

Greetings from ReNew Pvt. Ltd.!

ReNew Pvt. Ltd. is one of the largest renewable power producers in India, having an aggregated portfolio of ~20 GW, including more than 10 GW of operational capacity. We have portfolio of solar, wind & hydro assets with presence across various states in the country. The company is also the first Indian renewable company to be listed on NASDAQ.

This is in reference to TGDISCOM (TGSPDCL & TGNPDCL) on Amendment of model Solar PPA inviting comments/ suggestions. We are herewith submitting our comments as per attachment.

We request your good office to kindly consider our comments/suggestions while finalizing the same.

Thanking you.

Yours Sincerely,



for ReNew Private Limited



ReNew Private Limited
(Formerly known as ReNew Power Private Limited)

CIN: U40300DL2011PTC291527

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Annexure:

S. No.	Article	Existing	Amended	Remarks/Objections/Comments
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>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</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 consumption as specified in Schedule 1 of this Agreement. 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</p>	<p>We would like to submit that the tariff is fixed for 25 years which is determined based on the provisions of the existing rules and regulations, which adjusts all imports from delivered energy at the quoted tariff. Consequently, the demand for payments for imported energy based on HT-1 billing (measured in KVAh) would impose an additional financial burden on the generator company, as this cost was not accounted for in the fixed tariff outlined in the PPA.</p> <p>The imported power is being utilized for the following purposes, all of which are beyond the control of the generator:</p> <ul style="list-style-type: none"> • Auxiliary Power Requirements During Nighttime: Auxiliary power is imported at night to ensure the continuous operation of essential plant systems, such as SLDC communication, SCADA systems, and plant protection mechanisms. • Increased Auxiliary Consumption in Winter Months: During winter, shorter daylight hours lead to reduced generation time, resulting in higher auxiliary power consumption to maintain necessary operations. • Grid-Induced Power Factor Variations and Reactive Power Issues: Fluctuations in power factor and reactive power are caused by grid-related issues. These are outside the control of the generator and are not attributable to the plant's operations. • Daytime Power Imports Due to Grid and Departmental Issues: At times, the generator is compelled to import power during the day due to grid-related challenges and restrictions, which are beyond the generator's control. • Limited Power Imports for Essential Systems and Force Majeure Events: Imported power is used solely for essential purposes, such as lighting and maintaining auxiliary and communication systems with the SLDC during nighttime. This

		<p>loads not exceeding the auxiliary consumption.</p>	<p>category consumers as notified by the TGERC for the relevant financial year. 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</p>	<p>also includes scenarios of plant shutdown caused by unavoidable grid faults, grid-induced breakdowns, and force majeure events. ABT meters have been installed to monitor and align with this limited consumption.</p> <ul style="list-style-type: none"> • SLDC’s Round-the-Clock Communication Mandate: The SLDC requires continuous communication to be maintained 24/7, necessitating a consistent power supply for the related systems. <p>Given the above, the TGSPDCL’s proposal to penalize the generator by imposing HT tariffs for issues related to power factor, reactive power, and KVAh-based billing cannot be justified. These issues are predominantly grid-induced and beyond the generator’s control.</p> <p>The generator has made consistent efforts to limit consumption within the permissible limits outlined in the PPA. Therefore, we humbly request that the proposed amendment to impose HT tariffs or alter billing methodologies not be applied to the existing PPAs, as this would unfairly burden the generator with unforeseen costs and operational challenges.</p> <p>We have been successful and trying our best in limiting our consumption within the permissible limits as per PPA.</p> <p>It is therefore a humble request that the proposed amendment must not be made applicable for the existing PPAs.</p>
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