



Ref No: TPREL/TERC/15MW/FY-25/111

Date: 5th February 2025

To,
The Commission Secretary,
Telangana Electricity Regulatory Commission,
Vidyut Niyantran Bhavan, G.T.S. Colony,
Kalyan Nagar, Hyderabad, 500 045.
Email: secy@tserc.gov.in

Subject: Submission of comments, objections and suggestions on the proposal of amendment of PPA to the billing of imported energy from grid by the Solar Power Developers under PPA

Reference:

1. Telangana Electricity Regulatory Commission Notice in O.P. No. 33 of 2024

Dear Sir/ Madam,

This is in reference to the above stated notice issued by Telangana Electricity Regulatory Commission ("TGERC") inviting suggestions, objections, and comments on the proposals submitted by Telangana DISCOMs for amending the existing PPA clauses in respect of the billing of imported energy from the grid by Solar Generators to maintain auxiliary consumption.

TPREL entered into a PPA with TSNPDCL on 23.02.2016 for the supply of 15 MW of solar power ("PPA"). We would like to submit the following objections:

TPREL would like to submit the following preliminary analysis in relation to the above:

1. Finality of the PPA:

- a. The PPA was duly approved by this Hon'ble Commission, and the approval has never been challenged or disputed by any party. As a result, the approval and the PPA signed between the parties has attained finality.
- b. Once contracts have been concluded, approved by the Commission, and not challenged, they cannot be amended retrospectively.

2. Utilization of Imported Power:

- a. The imported power is being utilized for the following purposes, all of which are beyond the control of the generator:
 - i. Auxiliary Power Requirements During Night-time
 - ii. Increased Auxiliary Consumption in Winter Months
 - iii. Grid-Induced Power Factor Variations and Reactive Power Issues

TATA POWER RENEWABLE ENERGY

Tata Power Renewable Energy Limited

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- iv. Daytime Power Imports Due to Grid and Departmental Issues
- v. Limited Power Imports for Essential Systems and Force Majeure Events.

3. Fixed Tariff

- a. TPREL had quoted the fixed tariff for 25 years based on the existing PPA clause for adjusting imports from delivered energy at the quoted tariff.

The amendment sought by the DISCOMs to penalize the Generators 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.

Therefore, if any changes are implemented at this stage, this would have a direct commercial impact on the existing projects, which was not anticipated at the time of bidding. This will lead to an adverse financial impact.

As a Generator, we have made consistent efforts to limit consumption within the permissible limits outlined in the PPA.

4. Conclusion

In light of the above, it is submitted that the proposed amendment is not acceptable to us. Accordingly, we request that the proposed amendment to impose HT tariffs or alter billing methodologies should not be applied to the existing PPAs. However, should this Hon'ble Commission decide to proceed with this matter, we request to reserve the right to submit further submissions on this issue.

Yours faithfully,

For Tata Power Renewable Energy Limited,


Sumit Goel

Head-Commercial, PPA



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