



The Sirpur Paper Mills Limited

SIRPUR-KAGHAZNAGAR 504296

DIST. KOMARAMBHEEM ASIFABAD (T.S) INDIA

CIN: U21010TG1938PLC000591 GSTIN NO: 36AAACT7970R1ZG

BEFORE THE HON'BLE TELANGANA STATE ELECTRICITY
REGULATORY COMMISSION,
AT ITS OFFICE AT V FLOOR, SINGARENI BHAVAN, RED
HILLS, HYDERABAD.

O.P.NO. 9 OF 2024 (Suo-Moto)

In the matter of: SUO-MOTO DETERMINATION OF
COMPLIANCE OF RENEWABLE POWER
PURCHASE OBLIGATION OF OBLIGATED
ENTITIES FOR FY 2022-23.

Objector:

M/s. Sirpur Paper Mills Ltd.

...Objector

OBJECTIONS FILED BY THE OBJECTOR HEREIN

1. It is humbly submitted that the State Agency under Regulation No. 7 of 2022, SLDC, while determining compliance for the FY 2022-23, has stated in its Lr.No.CE/SLDC/REC/F.RPPO/D.No. 211/24 dt.04.06.2024 that it had issued an email dt.04.05.2024 to all the entities mentioned in the statement annexed thereto, however no such mail has been received by the Objector.
2. It appears that the SLDC has shown at Sl.No.3 therein, against the Objector's HT SC No.KMB-001, that it has consumed 1,33,569.30 MWH from a fossil fuel generator, and has shown RPPO thereof.
3. It is submitted that this Hon'ble Commission has framed Regulation No.7 of 2022 above with effect from 01.04.2022.

For The Sirpur Paper Mills Ltd.,



(K.N. Sesa Gopal)
Chief Manager (Legal)

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Clause 2(p)(ii) therein specifies an Obligated Entity to mean *inter-alia* a Captive User, i.e., any consumer who owns a grid connected CPP based on conventional fossil fuel with installed capacity of 1 MW or above, and consumes electricity generated from such plant for his own use.

4. The proviso thereto states that an obligated entity which consumes power in any year to the extent of total RPPO specified under Clause 3 from a fossil-fuel based cogeneration plant shall be exempted from RPPO.
5. The Objector herein manufactures pulp and paper in its manufacturing unit, and this process requires steam for coking of wood and drying the pulp to form paper.
6. The Objector operate two CPPs as follows:
 - a. Cogeneration Power Plant of 9.5 MW which uses by-products from the manufacturing process, i.e., black liquor obtained from the operation of the Pulp Mill.
 - b. Cogeneration Power Plant of 20 MW which operates on conventional fuel, i.e., coal.
 - c. These captive cogeneration plants generate electricity as well as useful thermal energy in the form of process steam. The process is therefore cogeneration within the definition in Section 2(12) of the Electricity Act, 2003, and the captive generating plants are captive cogeneration plants.

For The Sripur Paper Mills Ltd.,


(K.N. Seshu Gopal)
Chief Manager (Legal)

7. The 9.5 MW captive co-generation plant is fully exempt from RPPO compliance as it is based on black liquor, being a non-conventional fuel recognized by the MNRE.
8. The Objector consumes 100% of the power generated from our 20 MW captive co-generation plant, thereby fully meeting the exemption criteria from the RPP Obligations as outlined for FY 2022-23 under Clause 3 of Regulation No. 7 of 2022.
9. The Objector reserve its right to make further submissions at any stage of the proceedings and to respond by written submissions or otherwise to any oral or written submissions of the SLDC.
10. For the above reasons and for such other or further reasons as may be urged at any stage of the proceedings, it is prayed that this Hon'ble Commission may be pleased to determine that there is no requirement or obligation for the Objector herein to purchase any additional renewable energy or RECs for FY 2022-23.
11. The Objector requests to be heard in person through a representative or through its appointed counsel.

Place: Hyderabad
Date: 27.08.2024

For The Sirpur Paper Mills Ltd.,


(K.N. Seshu Gopal)
Chief **OBJECTOR**

BEFORE THE TELANGANA ELECTRICITY REGULATORY COMMISSION
AT HYDERABAD

O.P. No. 09 of 2024 (Suo-Moto)

Between:

Suo moto determination of compliance of renewable
power purchase obligation Entires By 2022-23

Plaintiff
Petitioner

Versus

M/S. Sirpur Paper Mills Ltd -- object

Defendant
Respondent

I/We

M/S Sirpur Paper Mills Ltd,

do hereby appoint and retain
CHALLA GUNARANJAN
M. SRIDHAR
DEEPAK CHOWDARY
Advocates

Advocate/s to appear for me/us in the above Suit/Case and to conduct and prosecute and defend the same and proceedings, that may be taken in the respect of any application for execution or any Decree or Order passed therein I/We empower my/our Advocate to appear in all miscellaneous proceedings in the above Suit matter ill all Decree or Orders are fully satisfied or adjusted to compromise and to obtain the return of Documents and draw any moneys that might be payable to me/us the said suit or of matter and notice I/We do further empower my/our Advocate to accept on my/our behalf, service of all or any appeals or petitions filed in any Court of appeal reference or revision with regard to said suit or matter before the disposal of the same in this Hon'ble Court.

For The Sirpur Paper Mills Ltd


(K.N. Sesa Gopal)
Chief Manager (Legal)

Certified that the executant who is well acquainted with English and this Vakalatnama and the contents of the Vakalatnama were read out and explained in Telugu/Urdu/Hindu to the executant or he/she/they being unacquainted with English who appeared to have perfectly understood the same and signed/put his/her/their name or mark in my presence.

Identified by: M. Sridhar Advocate.

Executed on this the 24th day of August 2024.

CHALLA GUNARANJAN
ADVOCATE
Advocate
Adj. to SBI Bank, Anandnagar,
Khairatabad, Hyderabad-500 004,
Cell : 9441219859

BEFORE THE TELANGANA
ELECTRICITY REGULATORY
COMMISSION AT HYDERABAD

O.P. No. 09 of 2024 (Suo-Moto)

Between:

Suo moto (RPPD) FY-2022-23 Petitioner

And

MIS. Sirpur Paper mills Ltd Respondent
-- Objector

VAKALAT

Advocates for: Objector

Filed on: 27-08-2024

Address for service of the said Advocate/s

CHALLA GUNARANJAN
Flat No.101 | Krishnaveni Pride |
H.No.8-3-833/204 |
Kamalapuri Colony | Hyderabad |
Telangana 500 073

Chief Manager (Legal)
(K. N. Srinivas Gobal)

For The Sirpur Paper Mills Ltd

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