

To The Secretary,
APERC
4th Floor Singareni Bhawan,
Red Hills,
Hyderabad 500 004



Subject: O.P.No.3 Of 2020 - Objections Submitted By Sri Subramanya Solar Power Projects L L P To The Draft Regulation Proposed By A.P.E.R.C To Amend Paragraph 17.1 Of The Andhra Pradesh Electricity Regulatory Commission (Terms And Conditions Of Open Access) Regulation, 2005

Respected Sir,

We have established Sri Subramanya Solar Power Projects LLP in February 2017 to install a 2 MW Solar Power Plant. Established as a captive generator for Sri Chakra Cement Ltd., which holds the required equity in the entity and consumes 100% of the power generated, hence qualifying as a captive power plant. The basis of establishing the viability of the project is the benefits extended by the AP Government as per the APERC Terms and Conditions of Open Access Regulation of 2005 and Amendment 1 of 2016.

With the proposed Second Amendment to delete provisions of paragraph 17.1 of the above regulation, we at Subramanya Solar Power are facing the threat of a financial crisis.

Being a first time entrepreneur, I was hopeful of contributing to the renewable energy movement by harnessing solar energy. The National and State level policies promoting Renewable Energy have given me confidence to go ahead and establish this power project by going as far as mortgaging personal assets to fund this project. With the imposing of Transmission and Distribution Charges, Wheeling Charges and Cross Subsidy surcharge, the project is no longer viable financially.

The Draft Regulation impairs our vested rights retroactively and is violative of the principles of legitimate expectation and promissory estoppel. We request you to protect us from the crisis that we may face as proposed by the Second amendment and support us in our mission to contribute to clean energy.

Yours Faithfully,

K. Sriram

Sriram Kapilavai

CEO

Sri Subramanya Solar Power Projects LLP

