

From

Sri Anil Kumar Singhal, I.A.S.,
Executive Officer

Office of the
Executive Officer

T.T.Devasthanams :: Tirupati

File No. TTD-57021(31)/12/2018-DEE-ELE-II-TTD Date: **05/03/2020**

To

THE SECRETARY,

Andhra Pradesh Electricity Regulating Commission,

D.No.11-4-660, 4th floor,

Singareni Bhavan, Red Hills,

HYDERABAD - 500 004.

 09/03
Sir,

Sub: TTD- Exemption of wheeling charges for 10 MW captive Solar Power plant established as per AP Solar Power Policy 2015 - Reg.

Ref: 1. Public notice dated 17-02-2020 on Draft Regulation to amend the "APERC (Terms and Conditions of Open Access) Regulation, 2005".



2. AP Solar Policy 2015 Vide G.O.Ms. No.8 dt. 12-02-2015 issued by Energy, Infrastructure & Investment (PR-II) Dept., Govt. of AP.

3. AP Solar Policy 2018 Vide G.O.Ms. No.1 dt.03-01-2019 issued by Energy Infrastructure & Investment (PR-II) Dept., Govt. of AP.

4. G.O. Ms. No.35 dt. 18-11-2019 issued by Energy (Power-II) Department, Govt. of AP.

5. Approval letter from CE, APSLDC, AP TRANSCO, Vijayawada vide approval No.APSLDC / 72 / 2019-20 Dt:28-01-2020.

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With reference to the public notice issued in reference (1), our objection on levying of wheeling charges to 10MW solar power plant for captive use, is proposed to be brought to your kind notice and consideration.

TTD has established a 10 MW Solar Power plant at Kosuvaripalli near Madanapalli, Chittoor District on Build, Own, Operate and Transfer (BOOT) basis through M/s. Vikram Solar Pvt. Ltd., Kolkata on payment of Rs. 4.49 per unit towards electrical energy generation for captive utilization of electrical energy to TTD 11 KV HT service connections. The Solar Plant was put into Commercial Operation w.e.f. 01.04.2017. The said 10 MW Solar Power Plant of TTD was established under AP Solar Policy 2015 as per G.O.Ms. No.8 dt. 12.02.2015 issued by the Energy, Infrastructure & Investment (PR-II) Dept., Govt. of AP. As per the Solar Policy 2015, as an incentive to Solar Power Project developers, payment of wheeling charges are exempted for a period of 10 years within an operative period of 5 years from the date of issuance of the G.O.

As per AP Solar Policy 2018, vide G.O.Ms.No.1, dated 03.01.2019 issued by Energy, Infrastructure & Investment (PR-II) Dept., Govt. of AP, the incentives to the Solar Project developers such as wheeling charges for intrastate were withdrawn and the incentives such as transmission and distribution of wheeling of power for interstate and energy banking, open access etc., were extended within the operating period of 5 years from the date of issuance of the G.O.

As per G.O.Ms.No. 35, Dt. 18.11.2019 issued by Energy (Power II) Department, Govt. of AP, an amendment to the AP Solar Policy 2018 was issued by deleting / amending all provisions in the Solar Policy 2015. While issuing approval to enter into short term open access agreement from 01.02.2020 to 31.07.2020, the Chief Engineer APSLDC, APTRANSCO has issued payment schedules for wheeling charges at 11 kV side at Rs. 432.38 per KW per Month. With these charges, for 10 MW Solar Power Plant, TTD has to pay Rs.43,23,800/- per Month and it works out to Rs. 5,18,85,600/- per annum.

For 10 MW Solar Power Plant, the expected annual electrical energy generation will be about 155 lakh units. The cost of electrical energy generated for captive adjustment for 11 KV HT service connections at Rs.7.30 per unit (APSPDCL Tariff) will be Rs. 1131.50 lakhs. The charges to be paid to the developer M/s. Vikram Solar towards electrical energy generation is Rs.695.95 lakh per annum and the annual wheeling charges payable to APSPDCL will be Rs. 518.85 lakhs. The total expenditure for electrical energy generation and wheeling charges will be Rs. 1214.80 lakhs, whereas the cost of electrical energy generation for captive

adjustment is Rs. 1131.50 lakhs. With the tariff of wheeling charges at 11 KV, solar project developers for open access at 11 KV side for captive use are not sustainable.

As per the AP Solar policy 2015 , the exemption of wheeling charge will be in force for 10 years from the date of issuance of the GO. Since our Captive Power plant is established under AP solar power policy 2015, we are entitled to avail exemption of wheeling charges till 31-03-2027.

As per the recent GO issued, the Govt of AP has withdrawn exemption of wheeling charge for solar power projects established as per AP Solar Power Policy 2018 Vide GO.Ms.No. 1, dated 03-01-2019 and the levy of wheeling charge would be in force prospectively and it is applicable to Solar plants that come into existence after 03-01-2019.

In this regard, it is requested to consider our objection on levy of wheeling charges to us and it is also requested to direct APTRANSCO/ APSPDCL not to levy wheeling charges on our Solar Power Plant, as the plant was established during 2017 and it comes under the AP Solar Power Policy, 2015 wherein payment of wheeling charges, cross subsidy charges etc., are exempted for a period of 10 years .

In the Service of Lord Venkateswara,

EXECUTIVE OFFICER

T.T.D :: Tirupati

Signature valid

Digitally signed by Anil Kumar
Singhal
Date: 2020.03.05 09:46:37 IST
Reason: Approved

