



ITC Limited
PAPERBOARDS & SPECIALTY PAPERS DIVISION
Divisional Headquarters : ITC Bhadrachalam House
106, Sardar Patel Road,
Secunderabad - 500 003, Telangana, India.
Telephone : 91 - 40 - 27846566 - 73
Fax : 91 - 40 27842997, Expts : 27810034
27849509, 27896048

To,
The Commission Secretary [FAC],
Telangana State Electricity Regulatory Commission,
5 th Floor, Singareni Bhavan, Red Hills,
Lakdi-ka-pul, Hyderabad 500004.
E-mail id: secy@tserc.gov.in,

Date: 24/12/2020.

Lr. No.: TSERC/BCM/RPPO/Objections/01.

Respected Sir,

Sub.: SUO-MOTO Determination of Compliance of Renewable Power Purchase Obligation of obligated entities for FY 2018-19, O.P. No. 31 of 2020 (Suo-Moto) - Reg.

This is with reference to above cited subject, we are herewith attaching our objections for the proposed determination of compliance of RPPO of Obligated Entities for FY 2018-19.

Thanking You,
For ITC Limited - Paperboards & Specialty Papers Division.

(Lakshmi Kumar V)
Manager – Energy.

Encl.: Above cited objections.

**BEFORE THE TELANGANA STATE ELECTRICITY REGULATORY
COMMISSION
AT HYDERABAD**

O.P. No. 31 / 2020 (Suo Motu)

In the Matter of :

Report of TSSLDC on compliance status of RPPO target for 2018-19

MEMORANDUM OF OBJECTIONS

filed on behalf of

ITC Ltd

Address: Attn:Mr.V.L.Kumar, Manager,
ITC Ltd,PSPD, Bhadrachalam House,
106,S.P.Road, Secunderabad.500003

May it please the Hon'ble Commission :-

1. The Objector herein is engaged in the manufacture of paper and paperboards at Sarapaka Village, Bhadrachalam District, Telangana. The generation of electricity at the plant is by co-generation process whereby heat energy used for pulp cooking, humidification and drying is produced along with electricity. The captive generating plant is therefore a co-generation plant. The Consumer Service No with TSNPDCL is BKM 011(KMM 036).
2. The Objector has not received any specific and individual notice from the Commission with respect to these proceedings insofar as non compliance with any purported obligation is alleged against the Objector. Neither a purported Public Notice on a website, nor a mere statement without necessary explanation is a due or proper notice in law for such proceedings. The Objector only incidentally noticed the notice on the Commission's website and was left with insufficient time to respond. To the extent possible in the limited time available, the Objector is setting out the objections briefly



reserving the right to make such further submissions as may be necessary at the oral hearings and thereafter during the course of the proceedings.

3. The TSSLDC report purports to show, at Sl. No. 7 of the tabular report, a purported non-compliance of Solar RPPO obligation of 26014.131 MWh with respect to an amount of 488070 MWh of self consumption from fossil fuel generator. The Objector reserves the right to respond further if and when the TSSDCL explains the manner in which the quantification has been done.
4. It is not known how the TSSLDC has arrived at the figure of 488070 MWh of self consumption from fossil fuel generation which is contrary to the information given to the TSSLDC in the formats required by them which aggregates only to 291799 MWh self consumption from fossil fuel generation during 2018-19.
5. Being co-generation, such energy is not subject to any RPPO obligation. The Appellate Tribunal has considered the scope of RPPO in terms of section 86(1)(e) of the Act with reference to co-generation. It has been held that co-generation cannot be fastened with RPPO at all irrespective of the fuel used. The Judgements of the Appellate Tribunal on the law and the interpretation of the provisions of the Act are binding on this Hon'ble Commission. Accordingly, no RPPO obligation can be imposed or enforced upon co-generation at all.
6. The Objector herein requests to be heard at the hearing through our counsel, Sri K. Gopal Choudary, Advocate, Mobile No 9246366259, E-mail gopalch.k@gmail.com; and due intimation of the link for the meeting may be communicated to him and to us at Mobile No. 9000080461 and e-mail vl.kumar@itc.in

2020 December 24



On behalf of the Objector