

Amravati Power Transmission Company Limited

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Tel.: - +91 124 3081930, Fax: - +91 124 3081948

Ref No: APTCL/MERC/LA/2014

Date: 14.04.2014

To,
The Secretary,
Maharashtra Electricity Regulatory Commission
World Trade Centre, Centre No. 1
13th Floor, Cuffe Parade,
Colaba, Mumbai 400 005

Subject: Submission of Reply to Data Gaps for Technical Validation Session in respect of Petition for amendment of Transmission License for Amravati Power Transmission Company Limited (APTCL)- Case No. 67 of 2014

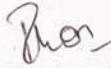
Dear Sir,

This is with respect to the Data Gaps received from Hon'ble Commission through Email dated 09.04.2014 for Technical Validation Session to be held on 15.04.2014, for APTCL petition for amendment of transmission license.

As compliance to above, we are herewith submitting six (6) copies of Response to Data Gaps identified for kind acceptance and approval by Honourable Commission.

Thanking you,

Yours faithfully,
For Amravati Power Transmission Company Ltd.



(Authorized Signatory)

Encl: As above

CC:

1. Director (Projects), MSETCL } - Along with enclosures
2. CE (STU), MSETCL }
3. Consumer Representatives - }
- Prayas Energy Group, Pune
 - Mumbai Grahak Panchayat Grahak Bhavan, Mumbai
 - Thane Belapur Industries Association, Navi Mumbai
 - Vidarbha Industries Association, Nagpur
 - Maharashtra Chamber of Commerce, Industry & Agriculture, Mumbai

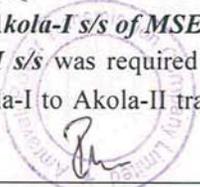
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Response of APTCL - Data Gaps/Deficiencies provided for Technical Validation Session (TVS)

S. No	Query raised by Hon'ble Commission	Clarification / Reply by Petitioner
1	Annexure – I: The applicant needs to support the rationale specified for requirement of amendment of the transmission licence with both hard and soft copies of all the references (letters) mentioned in the letter annexed at Annexure- I except for the MERC Orders.	In support of the rationale specified for requirement of amendment of transmission license with both hard copies and soft copies of all the following reference letters are enclosed at Appendix- 1 : <ol style="list-style-type: none">1. M/s. APTCL letter No. APTCL/400 KV /LILO & ML/11-12/061 dt. 15.10.112. CE STU's letter no. MSETCL/CO/STU/302B/15188 dt. 30.09.20103. CE STU's letter no. MSETCL/CO/STU/302B/3460 dt. 09.03.2010
2	Annexure – I: APTCL to submit the current status of the MoU referred in the Annexure-I and a copy of the same in case if it has been executed	MoU between STU, M/s. APTCL & M/s. MEGPTCL for shorting of APTCL's & MEGPTCL's 400 KV D/C Quad transmission lines outside 765/400 KV Akola –II S/s of MEGPTCL, since 765/400 KV Akola –II S/s of MEGPTCL was to be ready at later stage, was required to be taken up to avoid evacuation bottlenecks for Unit-1 of Amravati TPP of M/s. Indiabulls Power Ltd. at that time. However, considering fact that 400 KV LILO line of APTCL was at advanced stage of construction for facilitating necessary evacuation of power from Unit – 1 of Amravati TPP and the construction of 400 KV D/C Quad Moose transmission line of APTCL was ongoing, therefore, MoU was not felt necessary and hence was not taken up for signing.
3	Please submit the necessary correspondence received by APTCL for approval accorded by the STU for the revised connectivity i.e. termination of the 400kV Quad line at Akola-II substation instead of Akola-I substation and	Following correspondence was received by M/s. Indiabulls Power Ltd. from STU regarding revised connectivity: <ol style="list-style-type: none">1. CE STU's letter no. MSETCL/CO/STU/302B/3460 dt. 09.03.2010 Copy enclosed at Appendix – I



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S. No	Query raised by Hon'ble Commission	Clarification / Reply by Petitioner
	any other relevant correspondence.	
4	APTCL to submit the original and revised route map of the licensed transmission system, clearly highlighting the change in the scope.	Copy enclosed at Appendix – II
5	APTCL to submit the justification for terminating the 400 kV Quad Moose line from Amravati TPP to Akola-II instead of Akola-I. MEGPTCL was supposed to construct the Akola-II to Akola-I line instead of APTCL and hence, APTCL needs to provide reasons for changing the termination point for the proposed line.	<p>The Commission in its Order dated 30 December 2010 in Case No. 32 of 2010 for grant of Transmission License to APTCL under para no. 21 configured following scope of works for APTCL & MEGPTCL after considering the objections raised by MEGPTCL during grant of Transmission License to APTCL:</p> <p><i>a) APTCL's 400 KV Quad D/C line from Amravati to Akola will be connected to Akola-I substation of MSETCL initially and subsequently extended and connected to Akola-II substation of MEGPTCL.</i></p> <p><i>b) The 2 Nos. 400 KV line bays constructed by APTCL at Akola-I substation will be used to terminate MEGPTCL's 400 KV D/C transmission line from Akola-II to Akola-I.</i></p> <p><i>c) The 2 Nos. 400 KV line bays constructed by MEGPTCL at Akola-II substation will be used to terminate APTCL's 400 KV Quad D/C line from Amravati to Akola subsequently.</i></p> <p>As per above, as the 2 nos. 400 KV bays being constructed by APTCL at Akola-I substation were to be used for termination of 400 KV Quad D/C Akola-I to Akola-II transmission line of MEGPTCL, APTCL's 400 KV Quad D/C line from Amravati TPP to Akola which <i>was to be taken and connected at Akola-I s/s of MSETCL initially and subsequently extended and connected to Akola-II s/s</i> was required to be necessarily LILoed on one circuit of 400 KV D/C Quad Akola-I to Akola-II transmission line of MEGPTCL.</p> 

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		<p>Thus as per above methodology, APTCL was required to construct 400 KV Quad D/C transmission line from Amravati TPP to Akola-I substation of MSETCL firstly by making LILO arrangement for APTCL line on one circuit of 400 KV Akola-I to Akola-II line of MEGPTCL for facilitating evacuation of power from Amravati TPP and once 765/400 KV Akola-II S/s of MEGPTCL was ready then later dismantle the line from LILO end at Akola-I and extend this line till Akola-II s/s of MEGPTCL.</p> <p>Thus in consideration of above and considering fact that 400 KV LILO line of APTCL was at advanced stage of construction for facilitating necessary evacuation of power from Unit – 1 of Amravati TPP, APTCL opted for termination of 400 KV D/C Quad Moose transmission line at Akola-II instead of Akola-I.</p> <p>Accordingly APTCL proposed for termination point for its 400 KV Quad D/C transmission line at Akola-II, to which, MSETCL vide their letter dtd 20 October 2011, confirmed the feasibility for termination of 400 KV Quad transmission line of APTCL at 400 KV Akola-II sub-station of MEGPTCL while undertaking technical feasibility for evacuation of power from Amravati TPP.</p> <p>Accordingly, APTCL opted for termination of its 400 KV Quad transmission line at Akola-II instead of Akola-I.</p>
6	The draft Public Notice may be revised as suggested by the Commission especially regarding the issue of making the Petition and other necessary documentation available for inspection at the local office of APTCL within Maharashtra.	Draft Public Notice is revised as suggested is attached at Appendix-IV .



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7	APTCL to submit the financial impact due to change in scope of work on the tariff of the Intra-State Transmission System of Maharashtra.	<p>APTCL submits that as the route length for 400 KV Quad D/C transmission line from Amravati TPP to Akola-II is same as that of 400 KV Quad D/C transmission line from Amravati TPP to Akola-I, i.e. 104 km., thus no significant financial impact would be applicable on account of change in scope of work on the tariff of the Intra-State Transmission System of Maharashtra</p> <p>However, the proposed transmission tariff of APTCL transmission system is already provided to the Hon'ble Commission in APTCL's ARR Petition no. 17 of 2014 which may be considered.</p>
8	APTCL to submit the impact of the change in its scope of work on other transmission Licensees in the State of Maharashtra.	<p>The termination of APTCL's 400 KV Quad D/C transmission line directly at Akola-II end instead of <i>taking and connecting at Akola-I s/s of MSETCL initially and subsequently extending and connecting to Akola-II s/s</i> was carried out in cognizance & co-ordination with MSETCL & MEGPTCL Thus no impact of the above change on other transmission Licensees in the State of Maharashtra is envisaged.</p>
9	APTCL to clarify whether the change in its scope of work due to revised connectivity has been considered in the five year plan prepared by the STU for the State of Maharashtra and support the same with copies of relevant documents.	<p>APTCL has submitted the Network diagram of its transmission system to CE (STU), MSETCL vide email dated 06.01.2014 for necessary incorporation in the STU five year plan for FY 2013-14 to 2017-18. Copy at Appendix-IV</p>
10	APTCL to submit their Capex proposal for in-principle approval of the Commission if there is increase in the project cost in comparison to the original cost approved by the Commission due to change in the scope of work because of	<p>APTCL submits that as the route length for 400 KV Quad D/C transmission line from Amravati TPP to Akola-II is same as that of 400 KV Quad D/C transmission line from Amravati TPP to Akola-I, i.e. 104 km., any significant increase in project cost in comparison to original cost approved by the Commission is not envisaged.</p> <p>However, the details of capital cost for APTCL transmission system are already provided to the Hon'ble Commission in APTCL's ARR Petition no. 17 of 2014 which</p>

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	revised plan of the transmission system.	may be considered.				
11	APTCL to submit the SWOT (Strength, Weakness, Opportunity, Threat) analysis for amendment of transmission Licence particularly in view of RoW and Environmental Clearances and related documents regarding approvals of various statutory authorities.	SWOT analysis for amendment in transmission license is submitted for consideration:				
			Strength	Weakness	Opportunity	Threat
		Transmission line route length	Route length for Quad D/C line remains same i.e. 104 km	Not applicable	No significant impact on project cost.	Not applicable
		RoW issues	No significant RoW issues	RoW encountered for the towers falling under PKV boundary	Not applicable	Not applicable at this stage.
		Environmental clearances	No forest zone encountered	Not applicable	By directly terminating 400 KV Quad D/C line to Akola-II, APTCL has avoided Bargaon reserve forest zone which otherwise might have encountered	Not applicable
		Related to approvals of various statutory authorities.	All necessary approvals sought from Airports authority, Railways, MSETCL/ MSEDCL/	Not applicable at this stage.	APTCL has captured the opportunity by seeking all necessary approvals from Airports authority, Railways, MSETCL/ MSEDCL/ PGCIL for power line	Not applicable at this stage.

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			PGCIL for power line crossing, etc		crossing, etc
12	Please confirm that the revised route of the transmission system proposed by APTCL is not in violation of any provisions of the Electricity Act, 2003 especially with the provisions under Section 18 of the Electricity Act, 2003 as amended from time to time.	APTCL confirms that revised route of the transmission system proposed by APTCL is not in violation of any provisions of the Electricity Act, 2003 especially with the provisions under Section 18 of the Electricity Act, 2003 as amended from time to time.			
13	APTCL to submit the present status of the execution of the transmission line proposed for the scope of the amendment under present Petition.	<p>Present status is as per following:</p> <ol style="list-style-type: none"> 1. LILO line: charged on 02.10.2012 & is in operating condition 2. 400 KV Bays at Akola-I sub-station: Completed & Bus-I charged on January 29, 2014, Bus-II charging by April 2014 after grant of shut-down by MSETCL. 3. 400 KV Quad Transmission line: <ul style="list-style-type: none"> Foundations completed: 279 nos. out of total 279 nos. (100%) Tower Erection completed: 277 nos. out of 279 nos. (99%) Stringing Works completed: 74.11 km out of 103.30 km (72%) 			

