

**BEFORE THE HON'BLE
MAHARASHTRA ELECTRICITY REGULATORY COMMISSION**

FILING NO.: _____

CASE NO.: 50 of 2021

1. IN THE MATTER OF: Verification and Compliance of RPO Targets of BEST Undertaking for FY 2018-19 and FY 2019-20 as specified under MERC (Renewable Purchase Obligation, its Compliance and Implementation of REC Framework) Regulations, 2016

And

IN THE MATTER OF : Brihanmumbai Electric Supply and Transport Undertaking, BEST Bhavan, BEST Marg, Colaba, Mumbai- 400 001.

2. *Affidavit verifying the application*

I, Netaji Namdeo Chougule aged 52 years, son of Namdeo Chougule, having my office at BEST Undertaking, Colaba, Mumbai 400 001 do solemnly affirm and say as follows:

- 2.1 I am the Chief Engineer (Regulatory) of Brihanmumbai Electric Supply and Transport Undertaking, the applicant in the above matter and am duly authorized to make this affidavit.
- 2.2 The statements made in the enclosed submissions are based on the information received from the concerned officers of the Undertaking and I believe them to be true.
- 2.3 I say that there are no proceedings pending in any Court of Law/Tribunal or Arbitrator or any other authority wherein the deponent is a party and where issues arising and/or reliefs sought are identical or similar to the issues arising in the matter pending before the Commission.

I solemnly affirm at Mumbai on this ~~14th~~ May 2021 that the contents of the above affidavit are true to my knowledge, no part of it is false and nothing material has been concealed therefrom.



Deponent

**BEFORE THE HON'BLE
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IN THE MATTER OF: Verification and Compliance of RPO Targets of BEST Undertaking for FY 2018-19 and FY 2019-20 as specified under MERC (Renewable Purchase Obligation, its Compliance and Implementation of REC Framework) Regulations, 2016
And

IN THE MATTER OF: Brihanmumbai Electric Supply and Transport Undertaking, BEST Bhavan, BEST Marg, Colaba, Mumbai- 400 001.

The petitioner named above respectfully sheweth under:

1. The Municipal Corporation of Greater Mumbai is a Municipal Corporation, duly constituted under the Mumbai Municipal Corporation Act, 1888. The Municipal Corporation of Greater Mumbai is also a local authority under Part IX A of the constitution of India. The Municipal Corporation of Greater Mumbai, under the provisions of the Mumbai Municipal Corporation Act, 1888, has an Undertaking known as the Brihanmumbai Electric Supply and Transport Undertaking (of the Municipal Corporation of Greater Mumbai) [hereinafter referred to; for sake of brevity, as "BEST"]. BEST, as such, is a statutory Undertaking of a local authority.

2. BEST is a Municipal/public utility, which has been and is providing two essential services in the City of Mumbai, namely, (i) mass public transportation in the City of Mumbai as well as its extended suburbs, and (ii) distribution or supply of electricity in the Island City of Mumbai (i.e. the area from Colaba up to Mahim and Sion).
3. (A) BEST is a "distribution licensee" under the present Electricity Act, 2003. BEST, under the Maharashtra Electricity Regulatory Commission (Specific Conditions of Distribution License applicable to Brihanmumbai Electric Supply & Transport Undertaking of the Municipal Corporation of Greater Mumbai) Regulations, 2007, is authorized and required to distribute or supply electricity in the area of supply specified therein, in accordance with the provisions of the Electricity Act, 2003.
- (B) BEST, being a statutory Undertaking of the Municipal Corporation of Greater Mumbai is also encompassed by the definition of a "Local Authority" under Section 2(41) of the Electricity Act, 2003.
4. Hon'ble Commission in its order dated 31.07.2018 in case no. 208 of 2017 in the matter of verification and compliance of Renewable Purchase Obligation targets of BEST for FY 2016-17 had approved the RPO settlement data of BEST for FY 2016-17 as follows:

Table A: RPO settlement data approved by Hon'ble Commission for BEST for FY 2016-17

RPO settlement data for BEST (Approved) for FY 2016-17				
Item	Cumulative RPO (Surplus)/ Short fall till end of earlier control period (FY 2010-11 to FY 2015-16)	FY 2016-17		Cumulative RPO (Surplus)/ Short fall till end of FY 2016-17
	MU	%	MU	MU
Gross Energy Consumption	0.00	100%	4830.270	4830.270
Solar RPO				
Target	110.563	1.00%	48.303	158.865
Achievement	110.510	1.01%	48.930	159.440
Shortfall/(Surplus)	0.053	-0.013%	-0.627	-0.575
Non-Solar RPO				
Target	2245.54	10.00%	483.027	2728.565
Achievement	2243.805	9.03%	436.232	2680.037
Shortfall/(Surplus)	1.733	0.97%	46.795	48.528
Mini-Micro RPO(Within Non-Solar)				

Target	3.504	0.20%	0.968	4.472
Achievement	18.01	0.51%	2.458	20.463
Shortfall/(Surplus)	-14.501	-0.31%	-1.491	-15.992

5. MEDA, vide its letter dated 21 September, 2018, submitted the RPO settlement data for FY 2017-18 in respect of BEST to the Hon'ble Commission. BEST's RPO compliance position for this period as submitted by MEDA was summarized below:

Table B: RPO settlement data of BEST for FY 2017-18 submitted by MEDA to the Hon'ble Commission

Item	Cumulative RPO (Surplus)/ Short fall till end of earlier control period (FY 2010- 11 to FY 2015-16)	FY 2016-17		FY 2017-18		Cumulative RPO (Surplus)/ Short fall till end of FY 2017-18
		MU	%	MU	%	
Gross Energy consumption			100%	4830.27	100%	4989.82
Solar RPO						
Target	110.563		1.00%	48.303	2.00%	99.796
Achievement	110.510		0.97%	47.040	0.68%	34.225
Shortfall/(Surplus)	0.053		0.026%	1.263	1.31%	65.571
Non-Solar RPO						
Target	2245.538		10.00%	483.03	10.5%	523.931
Achievement	2243.805		9.03%	436.232	11.37%	567.832
Shortfall/(Surplus)	1.733		0.97%	46.795	-0.87%	-43.90
Mini-Micro RPO (Within Non-Solar)						
Target	3.504		0.20%	0.966	0.20%*	1.047
Achievement	18.005		0.51%	2.458	0.079%	0.415
Shortfall/(Surplus)	-14.501		-0.31%	-1.491	0.192%	0.632

6. Hon'ble Commission asked BEST to submit its response to the data furnished by MEDA. In its response dated 4 December, 2018, BEST stated that the RPO settlement data for FY 2017-18 is verified and corrected statement is given below considering the RPO settlement data of FY 2016-17 as approved by Hon'ble Commission in case no. 208 of 2017 :

**Table C : Corrected statement for RPO settlement data of BEST for FY 2017-18
submitted by BEST to the Hon'ble Commission**

Item	Approved Cumulative RPO (Surplus)/ Short fall up to FY 2016-17		FY 2017-18		Cumulative RPO (Surplus)/ Short fall till end of FY 2017-18
			%	MU	MU
Gross Energy at G-T Interface	4830.27			4989.85	
Solar	Standalone	Cumulative			
RPO Target	48.30	158.865	2.00 %	99.797	
RPO Achieved	48.93	159.44	0.69 %	34.2252	
RPO (-Surplus / Shortfall)	- 0.627	- 0.575		65.5718	64.9968
Non-Solar	Standalone	Cumulative			
RPO Target	483.027	2728.565	10.50 %	523.9311	
Non-Solar RE	234.72			191.02	
Non-Solar REC	201.52			376.81	
Non-Solar RPO Achieved	436.232	2680.037		567.8324	
RPO (-Surplus / Shortfall)	46.795	48.528		- 43.90	4.63
Mini / Micro Hydro	Standalone	Cumulative			
RPO Target	0.968	4.472	0.2 % of Non- solar RPO	1.0457	
RPO Achieved	2.458	20.463		0.41544	
RPO (-Surplus / Shortfall)	- 1.491	- 15.992		0.63242	- 15.3595
Approved Cumulative RPO Short fall up to FY 2016-17 (MUs)		47.95			
Total RPO Target for FY 2017-18			12.50 %	623.73	
Total RPO Achieved in FY 2017-18			12.07 %	602.05	
Standalone shortfall of FY 2017-18				21.68	
Cumulative shortfall of FY 2017-18				69.63 (47.95 + 21.68)	

7. Hon'ble Commission issued the Order on 02.04.2019 in the matter of verification of compliance of Renewable Purchase Obligation targets of BEST for FY 2017-18 in Case No. 37 of 2019 and approved the RPO settlement data of BEST for FY 2017-18 as follows:

Table D: RPO settlement data of BEST for FY 2017-18 approved by Hon'ble Commission

Item	Cumulative RPO (Surplus)/ Short fall till end of earlier control period (FY 2010-11 to FY 2015-16)	FY 2016-17		FY 2017-18		Cumulative RPO (Surplus)/ Short fall till end of FY 2017-18
	MU	%	MU	%	MU	MU
Gross Energy consumption		100%	4830.27	100%	4989.82	
Solar RPO						
Target	110.563	1.00%	48.303	2.00%	99.796	258.662
Achievement	110.510	0.97%	47.040	0.68%	34.225	191.775
Shortfall / (Surplus)	0.053	0.026%	1.263	1.31%	65.571	66.887
Non-Solar RPO						
Target	2245.538	10.00%	483.03	10.5%	523.931	3252.499
Achievement	2243.805	9.03%	436.232	11.37%	567.832	3247.869
Shortfall / (Surplus)	1.733	0.97%	46.795	-0.87%	-43.90	4.628
Mini-Micro RPO (Within Non-Solar)						
Target	3.504	0.20%	0.966	0.20%*	1.047	5.517
Achievement	18.005	0.51%	2.458	0.079%	0.415	20.878
Shortfall / (Surplus)	-14.501	-0.31%	-1.491	0.192%	0.632	-15.36

8. In this regard, BEST had observed the following apparent error on the face of record of Hon'ble Commission's Order:

8.1 Gross Energy Consumption:

As per the order for FY 2017-18, Gross Energy Consumption considered by Hon'ble Commission is 4989.82 MUs whereas the actual Gross Energy Consumption submitted by BEST was 4989.85 MUs which was also approved by Hon'ble Commission in its MTR Order for BEST dated 12 September 2018 in Case no. 203 of 2017.

8.2 Solar RPO:

In our submission, BEST had standalone shortfall for Solar RPO of 65.571 MUs for FY 2017-18 and cumulative shortfall of 64.9968 MUs till FY 2017-18. However as per the order for FY 2017-18, Hon'ble Commission has considered standalone shortfall for Solar RPO of 65.571 MUs for FY 2017-18 and cumulative shortfall of

66.887 MUs till FY 2017-18 which was apparent error on the face of record and needs to review. Further Hon'ble Commission in its order dated 31.07.2018 in case no. 208 of 2017 in the matter of verification and compliance of RPO targets of BEST for FY 2016-17 had approved the standalone surplus of 0.627 MUs and cumulative surplus of 0.575 MUs. However Hon'ble Commission had considered solar RPO shortfall of 1.263 MUs for FY 2016-17 which was apparent error on the face of record and needs to review. Therefore cumulative shortfall of solar RPO till the end of FY 2017-18 should be 64.996 MUs instead of 66.887 MUs.

9. Since the issue did not require immediate rectification & was not of urgent nature, BEST vide its letter ref. No. CER/MERC/372019 dated 28.05.2019 brought the above discrepancies to the notice of Hon'ble Commission and informed that BEST intend to take up this matter at the time of RPO verification of BEST for year 2018-19. BEST shall target RPO fulfillment considering the correct figure and accordingly submit at the time of verification. Copy of letter dated 28.05.2019 forwarded by BEST Undertaking to the Hon'ble Commission is enclosed herewith as **Annexure A**.
10. Hon'ble Commission, vide its letter dated 27 April 2021, in the matter of Verification and Compliance of Renewable Purchase Obligation targets of BEST for FY 2018-19 and FY 2019-20 as specified under MERC (Renewable Purchase Obligation, its Compliance and Implementation of REC framework) Regulations, 2016 has directed BEST to submit its replies on affidavit within two weeks from the date of the letter
11. As directed by the Hon'ble Commission, BEST submits its point-wise replies as follows:
 - a) **Reconciliation statement along with rationale with regards to GEC data reported by MSLDC and audited data of BEST.**

GEC approved by Hon'ble Commission for FY 2017-18 and FY 2018-19:

- i. Hon'ble Commission issued the order on 30.03.2020 in Case No. 324 of 2019 in the matter of petition filed by BEST Undertaking for Truing up of ARR for FY 2017-18

& FY 2018-19, Provisional Truing up of ARR for FY 2019-20 and ARR & Tariff for the 4th Control Period from FY 2020-21 to FY 2024-25.

- ii. While approving the Energy Balance of BEST for FY 2017-18 and FY 2018-19, Hon'ble Commission has given following rulings:

"4.3.5 The Commission has noted the submission of BEST. The Commission has considered the actual InSTS Loss as 3.30% and 3.11% for FY 2017-18 and FY 2018-19 as per the InSTS Loss details provided by MSLDC."

"4.3.6 The Commission has observed that energy drawn at T<>D interface for FY 2017-18 submitted by BEST is 4,824.85 MU which is not matching with MSLDC certificate i.e. 4,802.90 MU. The Commission has considered energy drawn at T<>D interface for FY 2017-18 as per MSLDC certificate for calculation of Distribution losses..."

"4.3.8 Accordingly, for the purpose of truing-up, the Commission approves the target Distribution Loss as 5.39% as against 5.82% approved for FY 2017-18. For FY 2018-19, and also approves the Distribution Loss as 4.18% as against 5.70% approved by the Commission in the previous MTR Order."

4.3.9 Based on the above, the energy balance approved by the Commission for FY 2017-18 and FY 2018-19 is given in the following Table:

Table E: Energy Balance for FY 2017-18 and FY 2018-19, as approved by the Commission

Particulars	Unit	FY 2017-18			FY 2018-19		
		MTR Order	MYT Petition	Approved in this Order	MTR Order	MYT Petition	Approved in this Order
Sales	MU	4,544.20	4,544.19	4,544.19	4,692.38	4,572.01	4,572.01
Distribution Loss	%	5.82%	5.82%	5.39%	5.70%	4.18%	4.18%
Energy Requirement at T<>D interface	MU	4,824.85	4,824.85	4,802.90	4,976.02	4,771.21	4,771.21
Intra-state Transmission Loss	%	3.31%	3.31%	3.30%	3.30%	3.10%	3.11%
Energy Requirement at G<>T interface	MU	4,989.85	4,989.85	4,966.61	5,145.63	4,923.79	4,924.18

“4.3.10 The Commission approves energy requirement at G<>T interface of 4,966.61 MU and 4,924.18 MU for FY 2017-18 and FY 2018-19, respectively.”

Discrepancy in GEC uploaded on MEDA RPO Web Portal and GEC approved by the Hon'ble Commission:

- iii. It is observed that the monthly data updated on MEDA RPO Portal is on the basis of monthly Transmission Loss declared by SLDC for FY 2017-18 and considering monthly Transmission Loss, Total GEC comes to 4967.10 Mus which is updated on RPO Portal. However as per Hon'ble Commission's Order dated 30.03.2020 in the matter of MYT petition filed by BEST (Case No. 324 of 2019), Hon'ble Commission has approved the GEC for the FY 2017-18 is 4966.61 Mus which is calculated on the basis of average transmission loss (3.30 %) declared by SLDC for FY 2017-18. Therefore there is a difference of 0.49 Mus between the GEC updated on RPO web portal (4967.10 Mus) and GEC approved by Hon'ble Commission (4966.61 Mus).
- iv. The same issue is with FY 2018-19. Monthly data updated on RPO Portal is on the basis of monthly Transmission Loss declared by SLDC for FY 2018-19 and considering monthly Transmission Loss, Total GEC comes to 4923.79 Mus which is updated on RPO Portal. However as per Hon'ble Commission's Order dated 30.03.2020 in the matter of MYT petition filed by BEST (Case No. 324 of 2019), Hon'ble Commission has approved the GEC for the FY 2018-19 is 4924.18 Mus which is calculated on the basis of average transmission loss (3.11 %) declared by SLDC for FY 2018-19. Therefore there is a difference of 0.39 Mus between the GEC updated on RPO web portal (4923.79 Mus) and GEC approved by Hon'ble Commission (4924.18 Mus).
- v. As there is a provision of updating GEC on monthly basis on MEDA RPO web portal and Hon'ble Commission is considering the average transmission loss of the year while calculating the annual Gross Energy Consumption, there will be difference of GEC updated on RPO web portal and GEC approved by Hon'ble Commission for the next years also. Therefore while updating the RPO data of BEST Undertaking for FY 2017-18, FY 2018-19 and FY 2019-20 on MEDA RPO web Portal, we have informed these discrepancies to MEDA vide our email dated 21.01.2021.

Revised RPO settlement data of BEST Undertaking for FY 2017-18:

- vi. Considering the energy requirement at G<>T interface of 4,966.61 MU for FY 2017-18 as approved by Hon'ble Commission in its order dated 30.03.2020 in Case No. 324 of 2019, BEST has revised the RPO settlement data for FY 2017-18 as follows:

Table F : Revised RPO settlement data of BEST Undertaking for FY 2017-18

Item	Approved Cumulative RPO (Surplus)/ Short fall up to FY 2016-17	FY 2017-18		Net Short fall /Surplus for FY 2017-18
		%	MU	MU
Gross Energy at G-T Interface			4966.61	
Solar				
RPO Target		2.00 %	99.3322	
Solar RE			33.05	
Solar REC			0	
Units from Net Metered consumers			1.17	
RPO Achieved		0.69 %	34.2252	
RPO (-Surplus / Shortfall)	- 0.575		65.11	64.54
Non-Solar				
RPO Target		10.50 %	521.4940	
Non-Solar RE			191.02	
Non-Solar REC			376.81	
Non-Solar RPO Achieved		11.43 %	567.8324	
RPO (-Surplus / Shortfall)	48.528		- 46.34	2.19
Mini / Micro Hydro				
RPO Target		0.2 %	1.042988	
RPO Achieved			0.41544	
RPO (-Surplus / Shortfall)	- 15.992		0.627548	- 15.3644
Approved Cumulative RPO Short fall up to FY 2016-17 (MUs)	47.95			
Total RPO Target for FY 2017-18		12.50 %	620.83	
Total RPO Achieved in FY 2017-18		12.12 %	602.05	
Standalone shortfall of FY 2017-18			18.78	
Cumulative shortfall/ (surplus) of FY 2017-18				66.73 (47.95 + 18.78)

- vii. BEST request the Hon'ble Commission to consider the energy requirement at G<T interface of 4,966.61 MU for FY 2017-18 as approved by Hon'ble Commission in its MYT order dated 30.03.2020 in Case No. 324 of 2019 as against energy requirement at G<T interface of 4,989.82 MU approved by Hon'ble Commission in its order dated 02.04.2019 in Case No. 37 of 2019 in the matter of verification of compliance of RPO target by BEST Undertaking for FY 2017-18.
- viii. BEST also request the Hon'ble Commission to approve BEST's standalone shortfall of Solar RPO of 65.11 Mus for FY 2017-18 and cumulative shortfall of Solar RPO of 64.54 MUs up to FY 2017-18 as against standalone shortfall of 65.571 Mus for FY 2017-18 and cumulative shortfall of Solar RPO of 66.887 MUs up to FY 2017-18 approved by Hon'ble Commission in its order dated 02.04.2019 in Case No. 37 of 2019 in the matter of verification of compliance of RPO target by BEST Undertaking for FY 2017-18.
- ix. BEST further request the Hon'ble Commission to approve BEST's standalone surplus of Non solar RPO of 46.34 Mus and cumulative shortfall of Non solar RPO of 2.19 Mus for FY 2017-18 as against standalone surplus of Non solar RPO of 43.90 Mus and cumulative shortfall of 4.628 Mus as approved by Hon'ble Commission in its order dated 02.04.2019 in Case No. 37 of 2019 in the matter of verification of compliance of RPO target by BEST Undertaking for FY 2017-18.
- x. The table showing the RPO data approved by Hon'ble Commission for FY 2017-18 in Case No. 37 of 2019 and the revised RPO settlement data of BEST Undertaking for FY 2017-18 is shown below:

Table G: RPO Settlement data approved by Commission and Revised RPO settlement data of BEST Undertaking for FY 2017-18

RPO Settlement data approved by Commission for FY 2017-18 in Case No. 37 of 2019								
GEC (Mus)	Solar RPO				Non solar RPO			
	Target (Mus)	Met (Mus)	Standalone (Mus)	Cumulative (Mus)	Target (Mus)	Met (Mus)	Standalone (Mus)	Cumulative (Mus)
4989.82	99.80	34.23	65.57	66.887	523.93	567.83	-43.90	4.628

Revised RPO Settlement data for FY 2017-18								
GEC (Mus)	Solar RPO				Non solar RPO			
	Target (Mus)	Met (Mus)	Standalone (Mus)	Cumulative (Mus)	Target (Mus)	Met (Mus)	Standalone (Mus)	Cumulative (Mus)
4966.61	99.33	34.23	65.11	64.54	521.49	567.83	-46.34	2.19

RPO settlement data of BEST for FY 2018-19

- x. BEST vide its letter ref. no. PP/RPS/MEDA/79/2019 dated 11.06.2019, has submitted audited data of RPO achievement report of BEST for FY 2018-19 in the prescribed format I,II and III to MEDA. While submitting the data to MEDA, BEST has considered the GEC of 4923.79 MUs. Subsequently BEST vide its letter ref.no. PP/RPS/MEDA/111/2019 dated 05.08.2019 has submitted the revised RPO achievement data of BEST for FY 2018-19.
- xi. Further Hon'ble Commission in its order dated 30.03.2020 in Case No. 324 of 2019, approved energy requirement at G<>T interface of 4,924.18 MU for FY 2018-19. Therefore RPO settlement data of BEST for FY 2018-19 considering the energy requirement at G<>T interface of 4,924.18 MU for FY 2018-19 is given below:

Table H: RPO settlement data of BEST for FY 2018-19

Item	Cumulative RPO (Surplus)/ Short fall up to FY 2017-18	FY 2018-19		Net Short fall /Surplus for FY 2018-19
		%	MU	
Gross Energy at G-T Interface			4924.18	
Solar				
RPO Target		2.75 %	135.41	
Solar RE			32.40	
Solar REC			167.96	
Units from Net Metered consumers			3.36	
RPO Achieved		4.14 %	203.72	
RPO (-Surplus / Shortfall)	64.54		- 68.31	- 3.77
Non-Solar				
RPO Target		11.00 %	541.6598	

Non-Solar RE			68.22	
Non-Solar REC			480.24	
Non-Solar RPO Achieved			548.46	
RPO (-Surplus / Shortfall)	2.19		- 6.80	- 4.61

Mini / Micro Hydro				
RPO Target		0.2 %	1.08	
RPO Achieved			0.00	
RPO (-Surplus / Shortfall)	- 15.3644		1.08	- 14.2844

Cumulative RPO Short fall up to FY 2017-18 (MUs)	66.73			
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Total RPO Target for FY 2018-19		13.75 %	677.07	
Total RPO Achieved in FY 2018-19		15.27 %	752.18	
Standalone shortfall of FY 2018-19			- 75.11	
Cumulative shortfall/ (surplus) of FY 2018-19				- 8.38 (66.73 - 75.11)

RPO settlement data of BEST for FY 2019-20:

- xii. BEST vide its letter ref. no. PP/RPS/MEDA/59/2020 dated 24.06.2020 has submitted audited data of RPO achievement report of BEST for FY 2019-20 in the prescribed format I,II and III to MEDA. While submitting the data to MEDA, BEST has considered the GEC of 4948.73 MUs. Subsequently BEST vide its letter ref.no. PP/RPO 2019-20/MEDA/115/2020 dated 28.12.2020 has submitted the revised RPO achievement data of BEST for FY 2019-20.
- xiii. As per the methodology adopted by the Hon'ble Commission for FY 2017-18 and FY 2018-19, BEST has considered the annual InSTS Loss as 3.17% for FY 2019-20 declared by MSLDC on its website. Therefore the energy requirement of BEST at G<>T interface for FY 2019-20 is works out to be 4948.94 MUs. Accordingly BEST has calculated RPO achievement data for FY 2019-20 as follows:

Table I: RPO compliance of BEST for FY 2019-20:

Item	Cumulative RPO (Surplus)/ Short fall up to FY 2018-19	FY 2019-20		Net Short fall /Surplus for FY 2019-20
		%	MU	MU
Gross Energy at G-T Interface			4948.94	
Solar				
RPO Target		3.50 %	173.21	
Solar RE			32.24	
Solar REC			136.69	
Units from Net Metered consumers			3.43	
RPO Achieved		3.48 %	172.36	
RPO (-Surplus / Shortfall)	- 3.77		0.85	- 2.91
Non-Solar				
RPO Target		11.50 %	569.13	
Non-Solar RE			58.95	
Non-Solar REC			513.00	
Non-Solar RPO Achieved		11.56%	571.95	
RPO (-Surplus / Shortfall)	- 4.61		- 2.82	- 7.43
Mini / Micro Hydro				
RPO Target		0.2 %	1.14	
RPO Achieved			0.00	
RPO (-Surplus / Shortfall)	- 14.2844		1.14	- 13.144
Cumulative RPO Short fall up to FY 2019-20 (MUs)		- 8.38		
Total RPO Target for FY 2019-20		15.00 %	742.34	
Total RPO Achieved in FY 2019-20		15.04 %	744.31	
Standalone shortfall of FY 2019-20			- 1.97	
Cumulative shortfall/ (surplus) of FY 2019-20				- 10.35 (8.38+ 1.97)

b) BEST should verify the RPO settlement details for FY 2018-19 and FY 2019-20, as submitted by MEDA (copy attached as Annexures to this letter) and highlight the discrepancies, if any, along with proper justification

Discrepancies in RPO settlement details of FY 2018-19:

i) Discrepancies in Gross Energy consumption:

Gross Energy consumption submitted by MEDA for FY 2018-19 is 4923.79 MUs. However Hon'ble Commission has approved the Gross Energy consumption of 4,924.18 MU for FY 2018-19 as per its order dated 30.03.2020 in Case No. 324 of 2019 in the matter of petition filed by BEST Undertaking for Truing up of ARR for FY 2017-18 & FY 2018-19, Provisional Truing up of ARR for FY 2019-20 and ARR & Tariff for the 4th Control Period from FY 2020-21 to FY 2024-25. BEST has considered the same while revising the RPO settlement data of BEST for FY 2018-19.

ii) Discrepancies in Solar and Non solar RPO target:

As the Gross Energy consumption of BEST for FY 2018-19 is revised from 4923.79 Mus to 4,924.18 MU, Solar and Non solar RPO target are revised from 135.40 MUs and 541.62 MUs to 135.41 MUs and 541.66 MUs respectively.

iii) Discrepancies in surplus of Non solar and total RPO:

As the Gross Energy consumption of BEST for FY 2018-19 is revised from 4923.79 Mus to 4,924.18 MU, the surplus of Non solar and total RPO are revised from 6.84MUs and 75.16 MUs to 6.80 MUs and 75.11 MUs respectively.

Discrepancies in RPO settlement details of FY 2019-20:

i) Discrepancies in Gross Energy consumption:

Gross Energy consumption submitted by MEDA for FY 2019-20 is 4948.73 MUs. However as per the methodology adopted by the Hon'ble Commission for FY 2017-18 and FY 2018-19, BEST has considered the annual InSTS Loss as 3.17% for FY 2019-20 declared by MSLDC on its website and accordingly the energy requirement of BEST at G<>T interface for FY 2019-20 is works out to be 4948.94 MUs. BEST has considered the same while revising the RPO settlement data of BEST for FY 2018-19.

ii) Discrepancies in shortfall of Solar RPO and surplus of Non solar RPO:

As the Gross Energy consumption of BEST for FY 2019-20 is revised from 4948.73 Mus to 4,948.94 MU, the shortfall of Solar RPO is revised from 1.59 MUs to 0.85 MUs and surplus of Non solar RPO is revised from 2.85 Mus to 2.82 Mus.

c) *BEST should submit the status of Solar, Non-Solar RPO compliance including Mini/Micro Hydro RPO compliance, as per the directives of the Commission vide Orders in Case No.181 of 2013, Case No.191 of 2014, Case No. 17 of 2016, Case No. 170 of 2016, Case No.208 of 2017 and Case No. 37 of 2019 along with detailed statement for project wise energy procurement in MUs from all Solar & Non-Solar generating projects including Mini/Micro Hydro projects and project wise contracted Solar and Non-Solar power capacity in MW during FY 2010-11 to FY 2019-20.*

Status of Solar RPO compliance:

- i. Hon'ble Commission, vide its order dated 17th April 2013 in Case no. 30 of 2013 has relaxed/waived the Solar RPO targets as stipulated under Regulation 7.1 of the MERC (RPO-REC) Regulation 2010 for BEST for FY 2010-11 and FY 2011-12 and directed BEST to fulfil the solar target on a cumulative basis by FY 2015-16.
- ii. Hon'ble Commission, vide its Order dated 24th April 2015 in Case no. 191 of 2014 in the matter of Verification and Compliance of Renewable Purchase Obligation targets by BEST Undertaking for FY 2013-14 as specified under MERC (Renewable Purchase Obligation, its compliance and Implementation of REC framework) Regulations, 2010 directed BEST to make up for past shortfalls, including the shortfall in FY 2013-14, by fulfilling its Solar RPO target on a cumulative basis by the end of FY 2015-16. If BEST is unable to procure sufficient Solar power for the purpose, it should meet the shortfall by purchase of Solar RECs to that extent before 31 March, 2016.
- iii. BEST's standalone Solar RPO target for FY 2015-16 was 25.29 MUs only. However BEST had procured total 32.88 MUs (additional 7.59 MUs) in FY 2015-16 to fulfill the solar RPO target on a cumulative basis from FY 2010-11 to FY 2015-16 as directed by Hon'ble Commission.
- iv. BEST's total Solar RPO target from FY 2010-11 to FY 2015-16 was 110.56 MUs and BEST has achieved cumulative Solar RPO target of 110.51 MUs up to FY 2015-16 with a shortfall of 0.05 MUs. Hon'ble Commission vide its order dated 30 May 2017

in Case no. 170 of 2016, had directed BEST to fulfill cumulative shortfall of 0.05 MUs in FY 2016-17.

- v. BEST's standalone Solar RPO target for FY 2016-17 was 48.30 MUs only. However BEST had procured total 48.93 MUs in FY 2016-17 to fulfill the solar RPO target of FY 2016-17 and cumulative shortfall of 0.05 MUs from FY 2010-11 to FY 2015-16 as directed by Hon'ble Commission vide its order dated 30 May 2017 in Case no. 170 of 2016. Out of total 48.93 MUs, BEST has purchased 33.39 MUs on long term basis from M/s Welspun Energy Maharashtra Pvt. Ltd and 15.54 MUs RECs from Power Exchanges. BEST has achieved Solar RPO target of FY 2016-17 with a surplus of 0.57 MUs.
- vi. Hon'ble Commission issued the Order on 02.04.2019 in the matter of verification of compliance of Renewable Purchase Obligation targets of BEST for FY 2017-18 in Case No. 37 of 2019 and approved Gross Energy Consumption of 4989.82 MUs, approved the standalone shortfall of solar RPO of 65.571 Mus for FY 2017-18 and cumulative shortfall of solar RPO of 66.887 Mus upto FY 2017-18. BEST vide its letter ref. No. CER/MERC/372019 dated 28.05.2019 informed Hon'ble Commission that the actual Gross Energy Consumption submitted by BEST was 4989.85 MUs which was also approved by Hon'ble Commission in its MTR Order for BEST dated 12 September 2018 in Case no. 203 of 2017 and cumulative shortfall of solar RPO till the end of FY 2017-18 should be 64.996 MUs instead of 66.887 MUs. BEST also informed that BEST intend to take up this matter at the time of RPO verification of BEST for year 2018-19. BEST shall target RPO fulfillment considering the correct figure and accordingly submit at the time of verification.
- vii. Thereafter Hon'ble Commission vide its order on 30.03.2020 in Case No. 324 of 2019 in the matter of MYT petition filed by BEST Undertaking, approved the energy requirement at G<=>T interface of 4,966.61 MU for FY 2017-18. Accordingly BEST's standalone Solar RPO target for FY 2017-18 was revised to 99.3322 MUs only. To fulfill the solar RPO target of FY 2017-18, BEST had procured total 34.2252 MUs. Out of this, BEST had purchased 33.05 MUs on long term basis from M/s Welspun Energy Maharashtra Pvt. Ltd and purchased 1.17 Mus of solar energy from Net Metering consumers. Therefore BEST's standalone shortfall and cumulative shortfall

of solar RPO was revised to 65.11 Mus and 64.54 Mus respectively for FY 2017-18 as against standalone shortfall and cumulative shortfall of solar RPO of 65.571 Mus and 66.887 Mus respectively approved by Hon'ble Commission in its order dated 02.04.2019 in Case No. 37 of 2019 in the matter of verification of compliance of RPO target by BEST Undertaking for FY 2017-18. Solar RPO settlement data of BEST upto FY 2017-18 is indicated in table below:

FY	Gross Energy in MUs (Actual/Projected)	% Solar RPO	RPO Target MUs	RPO Achieved (MUs)	Surplus / Shortfall in MUs	Cumulative Surplus / Shortfall in MUs
2010-11	4847.79	0.25	12.12	0.00	12.12	12.12
2011-12	4849.11	0.25	12.12	0.00	12.12	24.24
2012-13	4914.10	0.25	12.29	0.00	12.29	36.53
2013-14	4830.04	0.5	24.15	24.60	-0.45	36.08
2014-15	4919.00	0.5	24.60	53.03	- 28.44	7.64
2015-16	5057.81	0.5	25.29	32.88	- 7.59	0.05
2016-17	4830.27	1.0	48.30	48.93	- 0.63	- 0.57
2017-18	4966.61	2.0	99.33	34.22	65.11	64.54

- viii. BEST's standalone Solar RPO target for FY 2018-19 was 135.41 MUs (2.75 %) only. However BEST had procured total 203.720 MUs in FY 2018-19 to fulfill the solar RPO target of FY 2018-19. Out of total 203.720 MUs, BEST had purchased 32.40 MUs on long term basis from M/s Welspun Energy Maharashtra Pvt. Ltd, purchased 3.36 Mus of solar energy from Net Metering consumers and purchased solar RECs of 167. 96 Mus. BEST has achieved Solar RPO target of FY 2018-19 with a standalone surplus of 68.31 MUs and cumulative surplus of 3.77 Mus.
- ix. BEST's standalone Solar RPO target for FY 2019-20 was 173.21 MUs (3.50 %) only. However BEST had procured total 172.36 MUs in FY 2019-20 to fulfill the solar RPO target of FY 2019-20. Out of total 172.36 MUs, BEST had purchased 32.24MUs on long term basis from M/s Welspun Energy Maharashtra Pvt. Ltd, purchased 3.43 Mus of solar energy from Net Metering consumers and purchased solar RECs of 136.69 Mus. BEST has achieved Solar RPO target of FY 2019-20 with a standalone shortfall of 0.85 MUs and cumulative surplus of 2.91 Mus.
- x. The details of Solar RPO target achieved by BEST Undertaking for FY 2018-19 and FY 2019-20 are indicated in table below:

FY	Gross Energy in MUs (Actual/Projected)	% Solar RPO	RPO Target MUs	RPO Achieved (MUs)	Surplus / Shortfall in MUs	Cumulative Surplus / Shortfall in MUs
2018-19	4924.18	2.75	135.41	203.720	-68.31	- 3.77
2019-20	4948.94	3.50	173.21	172.36	0.85	- 2.91

- xi. Detailed statement of project wise energy procurement from various solar RE sources from FY 2010-11 to FY 2019-20 are enclosed herewith as **Annexure B**. Detailed statement of project wise contracted solar RE power from FY 2010-11 to FY 2019-20 are enclosed herewith as **Annexure C**.

Status of Non-Solar RPO compliance:

- i BEST's standalone Non - Solar RPO target for FY 2015-16 was 429.91 MUs and BEST has achieved the target of 423.70 MUs by the way of purchasing Non-solar energy and Non-solar RECs. BEST had a standalone shortfall of Non-solar RPO by 6.21 MUs for FY 2015-16.
- ii Hon'ble Commission was requested to consider the cumulative Non-solar RPO surplus of 4.48 MUs from FY 2010-11 to FY 2014-15 towards Non-solar RPO compliance for FY 2015-16 in case no. 17 of 2016 in the matter of Verification and Compliance of Renewable Purchase Obligation Cumulative targets for FY 2014-15.
- iii Hon'ble Commission has issued the order in this matter vide case No. 17 of 2016 dated 20.04.2016 and given the ruling as follows:

"BEST has sought to carry forward and set off the Non-Solar RPO surplus achieved in FY 2014-15 and earlier years against its target for subsequent years. The Commission notes that, as pointed out by IWPA, the CERC REC Regulations (Third Amendment) dated 30 December, 2014 provides Distribution Licensees the option to obtain tradeable RECs against the excess over the RPO target by applying to the Central Agency for issue of RECs provided certain conditions are met. The Commission notes that, in pursuance of its Order dated 11 January, 2016 in Case No 39 of 2015, the Secretariat of the Commission has issued a certificate in the prescribed format to enable Reliance Infrastructure Ltd. to approach the Central Agency in respect of the excess over its Solar and Non-Solar RPO targets in FY 2013-14. BEST should explore this option in the first instance."

- iv BEST in its letter Ref.No. CER/129/2016 dated 3rd August 2016 submitted to Hon'ble Commission, BEST has stated that BEST has procured RECs and not RE power in excess of its RPO for FY 2014-15. BEST had purchased Non-Solar RECs in the last trading session i.e. in March 2014 and March 2015 to overcome the shortfall up to March and fulfilled the RPO of respective years. Therefore BEST requested Hon'ble Commission to allow BEST to carry forward the cumulative surplus of Non-solar RPO up to FY 2014-15 to FY 2015-16 to enable BEST to reduce Non-solar RPO for FY 2015-16 to that extent.
- v CERC in its draft order dated 28.02.2017, had proposed a downward revision of Floor price of Rs. 1.00 per unit for solar and Non solar RECs from 1st April 2017. In view of above CERC draft order, RInfra-D filed a petition before Hon'ble Commission vide Case No 35 of 2017 to allow RInfra-D to defer the purchase of balance requirement of RECs of FY 2016-17 and allow cumulative fulfillment of RPO for FY 2016-17 and FY 2017-18.
- vi Hon'ble Commission issued Daily Order dated 16.03.2017 in Case No 35 of 2017 which allowed all Distribution Licensees to purchase RECs in FY 2017-18 to the extent of any shortfall in RPO compliance as on date, and to consider such purchase towards compliance of their RPO targets up to FY 2016-17.
- vii Since Hon'ble Commission had already approved in Daily Order for cumulative fulfillment of RPO for FY 2016-17 and FY 2017-18, BEST had not purchased the balance solar RECs and Non solar RECs during the trading sessions of RECs on 29.03.2017 to fulfill the RPO of FY 2016-17 and decided to purchase balance RECs of FY 2016-17 in FY 2017-18.
- viii Hon'ble Commission issued the Order on 02.04.2019 in the matter of verification of compliance of Renewable Purchase Obligation targets of BEST for FY 2017-18 in Case No. 37 of 2019 and approved Gross Energy Consumption of 4989.82 MUs, approved the standalone surplus of Non solar RPO of 43.90 Mus for FY 2017-18 and cumulative shortfall of Non solar RPO of 4.628 Mus upto FY 2017-18.
- ix. Thereafter Hon'ble Commission vide its order on 30.03.2020 in Case No. 324 of 2019 in the matter of MYT petition filed by BEST Undertaking, approved the energy requirement at G<>T interface of 4,966.61 MU for FY 2017-18. Accordingly BEST's

standalone Non Solar RPO target for FY 2017-18 was revised to 521.49 MUs only. To fulfill the Non solar RPO target of FY 2017-18, BEST had procured total 567.83 MUs. Out of this, BEST had purchased Non solar energy of 191.02 MUs on short term basis and purchased 376.81 Mus of Non solar RECs. Therefore BEST's standalone surplus and cumulative shortfall of Non solar RPO was revised to 46.34 Mus and 2.19 Mus respectively for FY 2017-18 as against standalone surplus and cumulative shortfall of Non solar RPO of 43.90 Mus and 4.628 Mus respectively approved by Hon'ble Commission in its order dated 02.04.2019 in Case No. 37 of 2019 in the matter of verification of compliance of RPO target by BEST Undertaking for FY 2017-18. Non solar RPO settlement data of BEST upto FY 2017-18 is indicated in table below:

FY	Gross Energy in MUs (Actual/Projected)	% Non-Solar RPO	RPO Target MUs	RPO Achieved (MUs)	Surplus / Shortfall in MUs	Cumulative Surplus / Shortfall in MUs
2010-11	4847.79	5.75	278.75	219.06	59.69	59.69
2011-12	4849.11	6.75	327.31	219.07	108.24	167.93
2012-13	4914.10	7.75	380.84	544.54	- 163.70	4.23
2013-14	4830.04	8.50	410.55	418.82	- 8.27	- 4.04
2014-15	4919.00	8.50	418.17	418.62	- 0.44	- 4.48
2015-16	5057.81	8.50	429.91	423.70	6.21	1.73
2016-17	4830.27	10.00	483.30	436.23	46.79	48.52
2017-18	4966.61	10.50	521.49	567.83	- 46.34	2.19

- x BEST's standalone Non Solar RPO target for FY 2018-19 was 541.66 MUs (11.00 %) only. However BEST had procured total 548.46 MUs in FY 2018-19 to fulfill the Non solar RPO target of FY 2018-19. Out of this, BEST had purchased 68.22 MUs of Non solar energy on short term basis and 480.24 MUs of Non solar RECs from Power Exchange. BEST has achieved Non Solar RPO target of FY 2018-19 with a standalone surplus of 6.80 MUs and cumulative surplus of 4.61 Mus.
- xi. BEST's standalone Non Solar RPO target for FY 2019-20 was 569.13 MUs (11.50 %) only. However BEST had procured total 571.95 MUs in FY 2019-20 to fulfill the Non solar RPO target of FY 2019-20. Out of this, BEST had purchased 58.95 MUs of Non solar energy on short term basis and 513 MUs of Non solar RECs from Power

Exchange. BEST has achieved Non Solar RPO target of FY 2019-20 with a standalone surplus of 2.82 MUs and cumulative surplus of 7.43 Mus.

- xii. The details of Non Solar RPO target achieved by BEST Undertaking for FY 2018-19 and FY 2019-20 are indicated in table below:

FY	Gross Energy in MUs (Actual/ Projected)	% Solar RPO	RPO Target MUs	RPO Achieved (MUs)	Surplus / Shortfall in MUs	Cumulative Surplus / Shortfall in MUs
2018-19	4924.18	11.00	541.66	548.46	- 6.80	- 4.61
2019-20	4948.94	11.50	569.13	571.95	- 2.82	- 7.43

- xi Detailed statement of project wise energy procurement from various Non-solar RE sources from FY 2010-11 to FY 2019-20 are enclosed herewith as **Annexure D**. Detailed statement of project wise contracted Non-solar RE power from FY 2010-11 to FY 2019-20 are enclosed herewith as **Annexure E**.

Status of Min-Micro Hydro RPO compliance:

- i. BEST confirms that BEST's standalone Mini/micro Hydro RPO target for FY 2018-19 was 1.08 MUs. BEST has standalone shortfall of Mini/micro Hydro RPO of 1.08 MUs with a cumulative surplus of 14.2844 MUs.
- ii. BEST confirms that BEST's standalone Mini/micro Hydro RPO target for FY 2019-20 was 1.14 MUs. BEST has standalone shortfall of Mini/micro Hydro RPO of 1.14 MUs with a cumulative surplus of 13.144 MUs.
- iii. Detailed statement of project wise energy procurement from various Mini/micro Hydro power sources from FY 2010-11 to FY 2019-20 is enclosed herewith as **Annexure F**. Detailed statement of project wise contracted Mini/micro Hydro power sources FY 2010-11 to FY 2019-20 is enclosed herewith as **Annexure G**.

Status of Total Cumulative RPO (including Solar, Non - Solar and Mini/micro Hydro):

- i. BEST confirms that BEST's standalone RPO target including Solar, Non - Solar and Mini/micro Hydro for FY 2018-19 was 677.07 MUs and BEST has achieved RPO

target of 752.18 MUs with a standalone surplus of 75.11 MUs and cumulative surplus of 8.38 Mus as shown in Table H above.

- ii. BEST confirms that BEST's standalone RPO target including Solar, Non - Solar and Mini/micro Hydro for FY 2019-20 was 742.34 MUs and BEST has achieved RPO target of 744.31 MUs with a standalone surplus of 1.97 MUs and cumulative surplus of 10.35 Mus as shown in Table I above.

d) BEST should submit detailed list of action and efforts undertaken by it prior to and during FY 2018-19 and FY 2019-20 to ensure compliance of RPO targets in respect of Solar RPO, Non-Solar RPO and Mini/Micro Hydro RPO.

The detailed list of actions and efforts undertaken by BEST prior to and during FY 2018-19 to ensure compliance of RPO targets in respect of Solar, Non-solar and Mini/micro hydro power are as follows:

- i. On 30.04.2008, BEST filed Case No.45 of 2008 before Hon'ble Commission, for approval of methodology of the EOI advertised on 03.09.2007, as a competitive bidding method for long term procurement of RE. The Hon'ble Commission, by Order dated 21.11.2008 passed in said Case No.45 of 2008, rejected the Petition filed by BEST on the ground of various infirmities making it not maintainable. The relevant Para 22 of said Order dated 21.11.2008 held, as follows:
"As is evident, there are infirmities in the Petition submitted by BEST, which cannot be covered by citing paucity of time. In view of this, the Petition filed by BEST is not maintainable and therefore stands rejected. However, the Commission grants liberty to BEST to file an appropriate Petition to seek the Commission's prior approval on the deviations contained in the bidding documents in accordance with the procedure prescribed by the "Guidelines for Determination of Tariff by Bidding Process for Procurement of Power by Distribution Licensees". Moreover, BEST can always procure renewable energy as per rates and other terms approved by the Commission in its respective Orders as detailed in the table below, which are applicable for all licensees in the State of Maharashtra, and meet its RPS obligation."

- ii. On 20.03.2009, BEST appointed a consultant for preparation of competitive bidding document for long term power procurement from RE sources, to implement aforesaid Order dated 21.11.2008 passed by the Hon'ble Commission in Case No. 45 of 2008 filed by BEST. Thereafter, on 20.01.2010, BEST submitted vide Case No. 101 of 2009 to the Hon'ble Commission, competitive bidding documents for long term power procurement from RE sources for approval. The Hon'ble Commission, by Order dated 30th November 2012 granted liberty to BEST to file an appropriate Petition for any deviation, after the Ministry of Power has notified the final Standard Bidding Guidelines for procurement of power from Renewable Energy Sources.
- iii. In the meantime, BEST had been and was procuring RE by duly and publicly inviting Expression of Interest from RE generators to meet its RPS Obligations. Following table indicates the details regarding various Expression of Interest (EoIs) advertised by BEST since FY 2007-08:

EoI Summary					
Sr. No.	Expression Of Interest Advt. on	No of offers	Suitable offer	Not-Suitable	MU offered
1	3 rd Sept'2007	2	2	0	300 MUs from Spark Green
2	30 th Nov'2007	1	1	0	31
3	26th June, 2008	23	9	14	6
4	16th Jan 2009	11	6	5	21
5	4th Aug'2009	5	5	0	93
6	15.May.2010	13	3	10	4
7	01 Sep. 2010	31	18	13	134
8	15. Feb-2011	49	12	37	220
9	15.Dec-2011	4	0	4	0
10	13. April-2012	10	6	4	345
11	08.Oct-2012	9	3	6	474
12	01Jan-2013	8	2	6	499

- iv. Based on the responses to the EoIs, BEST issued Letter of Intent (LoIs) to all the eligible RE generators/traders by adhering to the MERC (RPO-REC) Regulations, 2010 and procured RE during FY 2010-11 to FY 2013-14. To meet RPO target from FY 2014-15 to FY 2019-20, BEST continued some of the short term contracts by issuing Letter of Intent (LoIs).

- v. Hon'ble Commission, vide Order dated 26th December 2012 in Case no. 100 of 2012 in the matter of Verification and Compliance of Renewable Purchase Obligation targets by BEST Undertaking for FY 2010-11 and FY 2011-12 as specified under MERC (Renewable Purchase Obligation, its compliance and Implementation of REC framework) Regulations, 2010 directed BEST to fulfill the shortfall in RPO targets for both Solar and Non-Solar (including mini/micro hydro targets) for FY 2010-11 and FY 2011-12 and RPO targets for FY 2012-13 cumulatively before 31 March, 2013. Hon'ble Commission further directed BEST to consider availability of Non-Solar RECs, as one of the options amongst various available options, for fulfillment of its cumulative shortfall in Non-Solar RPO targets for FY 2010-11 and FY 2011-12.
- vi. BEST started procuring Non-solar RECs as early as FY 2010-11 by procuring 148 RECs (0.148 MU). During FY 2011-12, BEST procured 1000 RECs (1 MU of REC). Further to order of Hon'ble Commission in Case no. 100 of 2012, BEST procured 4,39,884 RECs (439.884 MUs) during FY 2012-13 for fulfillment of cumulative Non-solar RPO for FY 2010-11 to FY 2012-13. Continuing this, BEST procured 2, 20,000 Non-solar RECs (220 MUs) during FY 2013-14, 1,76,000 Non-solar RECs (176 MUs) during FY 2014-15, 1,25,000 Non-solar RECs (125 MUs) during FY 2015-16, 201520 Non-solar RECs (201.52 MUs) during FY 2016-17, Non-solar RECs (376.81 MUs) during FY 2017-18, Non-solar RECs of 480.24 MUs during FY 2018-19 and Non-solar RECs of 513 MUs during FY 2019-20.
- vii. Hon'ble Commission issued Daily Order in Case No 35 of 2017 which allowed all Distribution Licensees to purchase RECs in FY 2017-18 to the extent of any shortfall in RPO compliance as on date, and to consider such purchase towards compliance of their RPO targets up to FY 2016-17. Therefore BEST had not purchased the balance solar RECs and Non solar RECs during the trading sessions of RECs on 29.03.2017 to fulfill the RPO of FY 2016-17 and decided to purchase balance RECs of FY 2016-17 in FY 2017-18. Accordingly BEST had purchased 376.81 MUs of Non solar RECs from Power Exchange to fulfill the Non solar RPO target of FY 2017-18 and to overcome the shortfall of 48.52 MUs of FY 2016-17.
- viii. To fulfill solar and Non solar RPO of BEST for FY 2018-19, BEST had purchased solar energy of 32.40 Mus from Welspun Solar Energy Maharashtra Ltd., purchased

solar RECs of 167.96 MUs from Power Exchange, purchased solar energy of 3.36 Mus from Net Metering consumers, purchased non solar energy of 68.22 Mus on short term basis and purchased Non solar RECs of 480.24 Mus.

- ix. Further to fulfill solar and Non solar RPO of BEST for FY 2019-20, BEST had purchased solar energy of 32.24 Mus from Welspun Solar Energy Maharashtra Ltd., purchased solar RECs of 136.69 MUs from Power Exchange, purchased solar energy of 3.43Mus from Net Metering consumers, purchased non solar energy of 58.95 Mus on short term basis and purchased Non solar RECs of 513 Mus.
- x. Following table summarizes BEST's REC procurement during the period from FY 2010-11 to FY 2019-20:

FY	No of Non-solar RECs procured	Non-solar RECs in MUs
2010-11	148	0.148
2011-12	1,000	1.00
2012-13	439,884	439.884
2013-14	220,000	220
2014-15	176000	176
2015-16	125000	125
2016-17	201520	201.52
2017-18	376810	376.81
2018-19	480240	480.24
2019-20	513000	513

e) BEST should submit the details for long term RE procurement plan (in MUs and corresponding MW) for meeting the future RPO targets

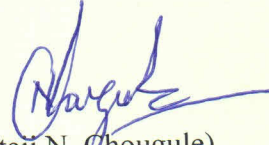
- i. BEST has entered into long term PPA with M/s Welspun Energy Maharashtra Pvt. Ltd. in the year 2013 to procure 20 MW Solar energy on long term basis for fulfillment of Solar RPO. The project has been commissioned in October 2013 and is supplying 31.5 MUs of Solar energy per annum to BEST.

- ii. SECI has offered 600 MW Solar Wind Hybrid Power to BEST for 25 years from the proposed 1110 MW Wind Solar Hybrid project. The projects are likely to commission in FY 2023-24. The Effective tariff for signing of PSA is Rs 2.48 per unit including SECI's Trading Margin of Rs 0.07 per unit. In this regard, BEST has filed the petition on 25.02.2021 for approval of Hon'ble Commission for procurement of 400 MW Solar Wind Hybrid power at rate of Rs 2.48 per unit for a period of 25 years. Hon'ble Commission vide its order dated 26.04.2021 in Case No. 16 of 2021 accorded its approval to the BEST Undertaking's procurement of 400 MW wind-solar hybrid power from Solar Energy Corporation of India Limited at tariff of Rs. 2.41/unit discovered through competitive bidding plus its trading margin of 7 paise/unit for 25 years.
- iii. By tying up 400 MW Wind Solar Hybrid power, BEST will receive 948.73 Mus of solar energy and 420.58 MUs of wind energy from FY 2023-24 onwards considering generation at declared CUF from the projects. As directed by Hon'ble Commission in Case No. 324 of 2019, BEST propose to meet its solar and Non solar RPO for FY 2020-21 and FY 2021-22 by procuring Solar and Non solar RECs. Wind Solar Hybrid power of 400 MW will be sufficient to meet the Solar and Non solar RPO of BEST from FY 2023-24 up to FY 2028-29.
7. In view of above, BEST respectfully prays that the Hon'ble Commission may be pleased to:
- i) Take into consideration the earnest efforts taken by BEST in meeting the RPO target and approve the total RPO target achieved by BEST up to FY 2019-20.
- ii) Consider the energy requirement of BEST at G<>T interface of 4,966.61 MU for FY 2017-18 as approved by Hon'ble Commission in its MYT order dated 30.03.2020 in Case No. 324 of 2019.
- iii) Approve BEST's standalone shortfall of 65.11 Mus for FY 2017-18 and cumulative shortfall of Solar RPO of 64.54 MUs up to FY 2017-18 as against standalone shortfall of 65.571 Mus for FY 2017-18 and cumulative shortfall of Solar RPO of 66.887 MUs up to FY 2017-18 approved by Hon'ble Commission in its order dated

02.04.2019 in Case No. 37 of 2019 in the matter of verification of compliance of RPO target by BEST Undertaking for FY 2017-18 and allow BEST to carry forward the same to FY 2018-19.

- iv) Approve BEST's standalone surplus and cumulative shortfall of Non solar RPO of 46.34 Mus and 2.19 Mus respectively for FY 2017-18 as against standalone surplus and cumulative shortfall of Non solar RPO of 43.90 Mus and 4.628 Mus respectively approved by Hon'ble Commission in its order dated 02.04.2019 in Case No. 37 of 2019 in the matter of verification of compliance of RPO target by BEST Undertaking for FY 2017-18 and allow BEST to carry forward the same to FY 2018-19.
- v) Approve BEST's standalone surplus of solar RPO of 68.31 Mus for FY 2018-19 and cumulative surplus of solar RPO of 3.77 Mus up to FY 2018-19 and allow BEST to carry forward the same to FY 2019-20.
- vi) Approve BEST's standalone surplus of Non solar RPO of 6.80 Mus for FY 2018-19 and cumulative surplus of Non solar RPO of 4.61 Mus up to FY 2018-19 and allow BEST to carry forward the same to FY 2019-20.
- vii) Allow BEST to fulfill the shortfall of Mini-Micro Hydro RPO of 1.08 MUs in FY 2018-19 cumulatively.
- viii) Approve BEST's standalone shortfall of solar RPO of 0.85 Mus for FY 2019-20 and cumulative surplus of solar RPO of 2.91 Mus up to FY 2019-20 and allow BEST to carry forward the same to FY 2020-21.
- ix) Approve BEST's standalone surplus of Non solar RPO of 2.82 Mus for FY 2019-20 and cumulative surplus of Non solar RPO of 7.43 Mus up to FY 2019-20 and allow BEST to carry forward the same to FY 2020-21.
- x) Allow BEST to fulfill the shortfall of Mini-Micro Hydro RPO of 1.14 MUs in FY 2019-20 cumulatively.

- xi) Grant the liberty to BEST Undertaking to add/change/modify/alter this affidavit and make further submissions as may be required at future date.
- xii) Pass such further and other orders as the Hon'ble Commission may deem fit and proper keeping in view of the facts and circumstances of the case.



(Netaji N. Chougule)
Chief Engineer (Regulatory)
For Brihanmumbai Electric Supply and Transport Undertaking