



PUDUMJEE

PUDUMJEE INDUSTRIES LTD.
Registered Office

Ref:LKD:Engg:rrt: 101

Date: 14.07.2017

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

Sub: Suo-Motu proceedings for Verification and Compliance of Renewable Purchase Obligation targets for FY 2010-11 to FY 2013-14 by Obligated Entities (Other than Distribution Licensees)

Case No. 101 of 2017

Ref: Notice No. MERC/Case No. 101 of 2017/2017-18/3425 dated 23.06.2017 with Annexure-A related with RPO calculations

Hon'ble Sir,

Please find enclosed herewith the RPO Compliance, Comments and Suggestions of subject matter (1+5 copies), which may please be considered while disposing Case No. 101 of 2017.

Thanking you, we remain;

Yours faithfully
For Pudumjee Industries Limited

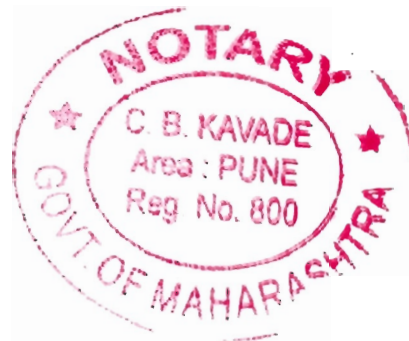
Ved P Leekha
Managing Director

ATTESTED

CHANDRAKANT B. KAVADE
ADVOCATE & NOTARY
GOVT. OF MAHARASHTRA
PUNE

Encl: A/a.

CC: The Director General, MEDA



Registered Office:

Thergaon, Chinchwad, Pune-411033 Tel: +91-20-40773333, Fax : +91-20-4077 3388
E-Mail : pune@pudumjee.com, sk@pudumjee.com.

Corporate Office:

Jatia Chambers, 60, Dr. V.B.Gandhi Marg, Kalaghoda. Mumbai-400001 India.
Tel: +91-22-30213333, 22674485, 66339300, Fax: +91-22-22658316.
E-Mail: pudumjee@pudumjee.com



Form I
[See Regulation 31]

**BEFORE THE MAHARASHTRA ELECTRICITY REGULATORY COMMISSION,
MUMBAI**

Petition No. 101/2017

In the matter of,

Suo-Motu proceedings for Verification and Compliance of Renewable Purchase Obligation targets for FY 2010-11 to FY 2013-14 by Obligated Entities (Other than discom)

Ref. Notice No. No. MERC/Case No. 101 of 2017/2017-18/3425 dated 23.06.2017 with Annexure-A related with RPO calculations

Pudumjee Industries Limited

Respondent

We, Pudumjee Industries Limited the Respondent above named do hereby nominate, appoint and constitute, **Mr. Lalji K Dwivedi** to act, plead and appear on our behalf in the aforesaid matter.

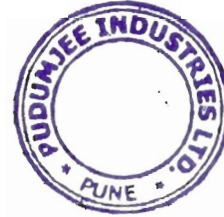
IN WITNESS WHEREOF we have set and subscribed our hands to this writing on 15th July 2017.

Place: Pune
Date: 15th July 2017



Signature

Ved P Leekha
Managing Director



Address:
Pudumjee Industries Limited,
Thergaon, Chinchwad,
Pune 411 033
Phone No.: 020-30613333 Fax No.: 020-30613388

ATTESTED

**CHANDRAKANT B. KAVADE
ADVOCATE & NOTARY
GOVT. OF MAHARASHTRA
PUNE**

I/We accept
Lalji K Dwivedi

Form II
[See Regulation 40]

**BEFORE THE MAHARASHTRA ELECTRICITY REGULATORY COMMISSION,
MUMBAI**

Petition No. 101/2017
(To be filled by the Office)

In the matter of,

Suo-Motu proceedings for Verification and Compliance of Renewable Purchase Obligation targets for FY 2010-11 to FY 2013-14 by Obligated Entities (Other than discom)

Ref. Notice No. No. MERC/Case No. 101 of 2017/2017-18/3425 dated 23.06.2017 with Annexure-A related with RPO calculations

Respondent - Pudumjee Industries Limited
Thergaon, Chinchwad,
Pune 411 033
Phone No.: 020-30613333 Fax No.: 020-30613388

Submission/Ground in support of the case.

Pudumjee Industries Limited is RE user under open access during FY 2010-11 to 2013-14. Hence we are not Obligated Entity for RPO Compliance. However, erroneously we have received Notice for compliance. Hence the enclosed submission.

Relief Clause in short:

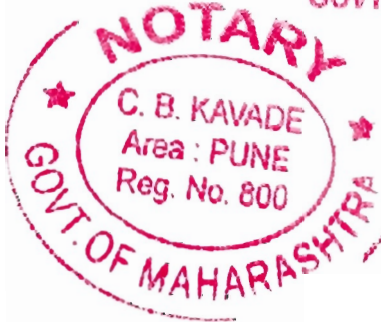
1. Kindly exempt Pudumjee Industries Limited which was RE user under Open Access during the period FY 2010-11 to 2013-14 as recommended by MEDA.
2. In case of Non Obligated generator/consumer kindly direct MEDA that instead of demanding new certification from concerned authorities every RPO year existing Certificates for Gen-set Registration, issued by Chief Engineer (Electrical) or NOC from MSEB (U/s. 44 of EA 1948) and/or Open Access permission, issued by Licensee shall be sufficient to exempt Off Grid CPP, Co-gen, Standby CPP, RE-CPP/OA consumers and OA consumers for Obligated Entity for RPO.

Enclosed Affidavit.

Place: Pune
Date: 15th July 2017

ATTESTED
[Signature]

CHANDRAKANT B. KAVADE
ADVOCATE & NOTARY
GOVT. OF MAHARASHTRA
PUNE



Signature

[Signature]

Ved P Leekha
Managing Director



Form III

**BEFORE THE MAHARASHTRA ELECTRICITY REGULATORY COMMISSION,
MUMBAI**

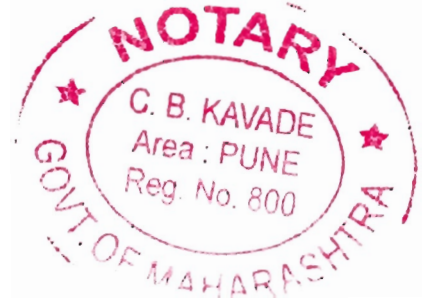
Petition No. 101/2017
(To be filled by the Office)

In the matter of,

Suo-Motu proceedings for Verification and Compliance of Renewable Purchase Obligation targets for FY 2010-11 to FY 2013-14 by Obligated Entities (Other than discom)

Ref. Notice No. No. MERC/Case No. 101 of 2017/2017-18/3425 dated 23.06.2017 with Annexure-A related with RPO calculations

Respondent - Pudumjee Industries Limited
Thergaon, Chinchwad,
Pune 411 033
Phone No.: 020-30613333 Fax No.: 020-30613388



Affidavit verifying the Petition

I, Ved P Leekha son of Mr. Nandlal aged 75 years residing at Pudumjee Industries Limited, Thergaon, Chinchwad, Pune 411033 do solemnly affirm and say as follows.

1. I am the respondent authorized representative of Pudumjee Industries Limited in the above matter and am duly authorized and competent to make this affidavit.
2. The statements made in enclosed affidavit are true to my knowledge and belief statements made in Petition Page No. 1 to 5 are based on information and I believe them to be true.
3. I say that there are no proceedings pending in any court of law/tribunal or arbitrator or any other authority, wherein the Petitioners are a party and where issues arising and/or relief

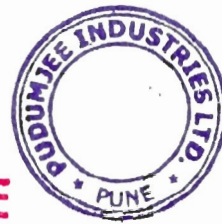
sought are identical or similar to the issued arising in the matter pending before the Commission.

Solemnly affirm at Pune on 15th July 2017 that the contents of the above affidavit are true to my knowledge, no part of it is false and nothing material has been concealed there form.

For Pudumjee Industries Limited



Ved P Leekha
Managing Director



BEFORE ME

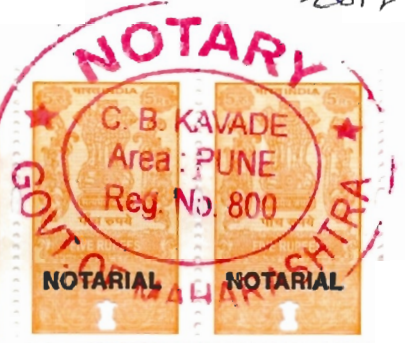


CHANDRAKANT B. KAVADE
ADVOCATE & NOTARY
GOVT OF MAHARASHTRA
PUNE

15th JUL 2017

Noted and Registered
at Serial No.. 1173

2017



**Submitted before
Maharashtra Electricity Regulatory Commission, Mumbai**

Sub: Suo-Motu proceedings for Verification and Compliance of Renewable Purchase Obligation targets for FY 2010-11 to FY 2013-14 by Obligated Entities (Other than Distribution Licensees)
Case No. 101 of 2017

Ref. Notice No. No. MERC/Case No. 101 of 2017/2017-18/3425 dated 23.06.2017 with Annexure-A related with RPO calculations

Response to 'Annexure-A' of notice under reference

We, Pudumjee Industries Limited hereafter called as "PIL" are HT Consumer manufacturing specialty grades of paper and has 4.95 MVA Contract Demand sanctioned from MSEDCL. PIL has no CPP facility to generate its own power and consume.

From the beginning, 2010-11 to 2013-14 wind energy was purchased from Third Party Sale and wheeled under Open Access permitted by GOM/Hon'ble Commission. During said period PIL has used Renewable Energy along with MSEDCL's supply and **has never procured energy from any other supplier based on fossil fuel generation under Open Access**. Hence, it is our submission that as per Regulations 5.1(b) of the RPO Regulations 2010, PIL is not an obligated entity to meet the Renewable Purchase Obligation.

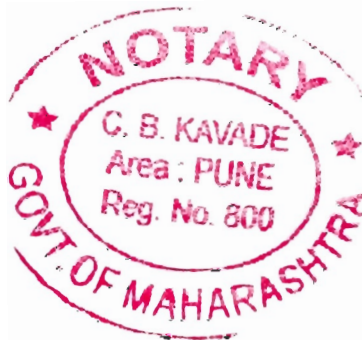
We received a reminder letter No. BP/RPO-STATUS/2012/2716 dated 01.06.2012 from Maharashtra Energy Development Agency (MEDA) enclosed as **Annexure-1** asking for submission of RPO data for the year 2010-11 and 2011-12. Accordingly, we submitted that we are not Obligated Entity for fulfillment of RPO.

We explained in detail to Nodal Agency during the meeting of CPP/OA Consumers on 22.08.2013 in MEDA Office. We gave the reference of MERC Order in Case No. 49 of 2013 dated 22.07.2013 wherein Hon'ble Commission has reproduced its original condition in Clause No. 5.1 (a) & (b) of Regulations 2010 that the RPO is applicable only for the consumers who consume fossil fuel based power through Open Access from this generator other than Discom. In our case we were not user of power from fossil fuel generator hence we are not eligible to comply RPO.

We again submitted a letter No. LKD:Engg:rrt:911 dated 01.09.2013 as enclosed **Annexure-2** that the PIL is not Obligated Entity for following reasons.

1. PIL have not installed any captive power plant for power generation.
2. PIL didn't consume electricity procured from conventional fossil fuel based generation through Open Access during the subject RPO period.

As directed by Hon'ble Commission we enclose herewith corrected **Annexure-A**.



ATTESTED

CHANDRAKANT B. KAVADE
ADVOCATE & NOTARY
GOVT. OF MAHARASHTRA
PUNE

Page 1

Prayer:

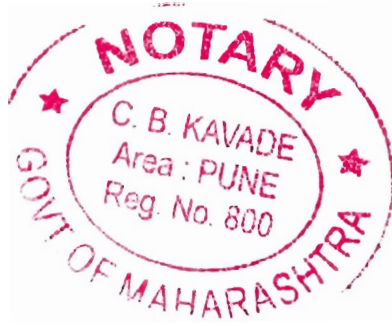
We therefore pray that;

1. Kindly consider our submission and direct MEDA that Pudumjee Industries Limited is not an Obligated Entity to meet RPO for the period from FY 2010-11 to FY 2013-14.
2. In case of Non Obligated generator/consumer kindly direct MEDA that instead of demanding new certification from concerned authorities every RPO year existing Certificates for Gen-set Registration, issued by Chief Engineer (Electrical) or NOC from MSEB (U/s. 44 of EA 1948) and/or Open Access permission, issued by Licensee shall be sufficient to exempt Off Grid CPP, Co-gen, Standby CPP, RE-CPP/OA consumers and OA consumers for Obligated Entity for RPO.

Thanking you,

Yours faithfully,


Ved P Leekha
Managing Director



ATTESTED


CHANDRAKANT B. KAVADE
ADVOCATE & NOTARY
GOVT. OF MAHARASHTRA
PUNE

Name of the Company/Organization : Pudumjee Industries Ltd.

Obligated Entities: (tick the appropriate option): Captive user (CPP): () or Open Access (OA) Consumer: (✓) or Exempted Captive User/Open Access Consumer (✓)

Name of the Distribution Licensee's Area: Maharashtra State Electricity Distribution Company Limited (MSEDCL)

For CPP: Plant Installed Capacity (in MW): Not Applicable (Captive Use form power plant in MW: Not Applicable, Sale outside/third party (in MW): Not Applicable)

For OA Consumer: Power Demand (in MVA): Not Applicable (Source: Wind, Consumption location: Thergaon, Pune 411033)

Year	Contract Demand	Total Energy Consumption	Solar RPO			Non-Solar RPO Target for respective years	Non-Solar RPO			Total energy to be procured as per RPO	Total RE procurement (Solar + Non-Solar) (A+B)	Shortfall	Cumulative Shortfall	
			Solar RPO Target	Energy actually procured against target (A)			Non-Solar REC	Non-Solar RE	Non-Solar REC					Non-Solar RE
				MU										
				Solar RE										
F.Y 2010-11	4.95	7.5400	0	0	0	0	0	0	0	MU	MU	MU		
F.Y 2011-12	4.95	8.3230	0	0	0	0	0	0	0					
F.Y 2012-13	4.95	5.0579	0	0	0	0	0	0	0					
F.Y 2013-14	4.95	7.5760	0	0	0	0	0	0	0					

The OA Consumer / CPP user may refer the total year wise target for RPO is specified in Regulations 7.1 of RPO Regulations, 2010 for reconciliation

CHANDRAKANT B. KAVADE
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PUNE



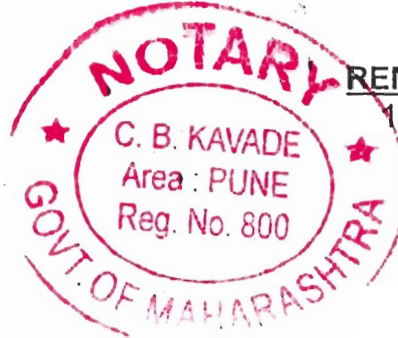
MAHARASHTRA ENERGY DEVELOPMENT AGENCY (MEDA)

(A Government of Maharashtra Undertaking)

Annexure-1

Ref: BP/ RPO-STATUS/2012/ 2716

To,
M/s Pudumji Agro Ind. Ltd.
Thergaon, Chinchwad,
Pune, Maharashtra - 411 033



REMINDER

1st June 2012

Sub: - Submission of RPO Data for the year 2010-2011 & 2011-2012.

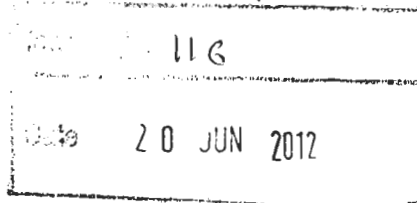
- Ref: - 1. MERC's "Renewable Purchase Obligation, Its compliance & Implementation of REC framework" Regulation 2010.
2. Our letter no. BP/ RPO-STATUS/2012/1118 dated 5.03.2012
3. Our letter no. BP/ RPO-STATUS/2012/2079 dated 21.04.2012

Sir,

Please refer this office letters mentioned above regarding subject under caption. In this regard this is to inform you that, the requisite data is yet to be received from your end. Since financial year 2011-12 has already been passed the compilation of RPO data is delayed due to non submission of information from your end.

As per information received from MSEDCL your CPP/OA plant is grid connected on MSEDCL network and hence, submission of RPO data for year 2010-11 & 2011-12 in MERC approved data collection format is mandatory to you. In case your plant falls under co-generation category you may submit necessary proof/certification from concern MSEDCL authority to that effect.

Please note that, above mentioned RPO data/information should be submitted to this office by 15th June 2012 positively. Failure of which your RPO achievement shall be treated as nil & your project will be liable for penalty as per RPO-REC Regulation 2010.



Yours Sincerely,

General Manager (REC, R & D)

CC: The Secretary,
Maharashtra Electricity Regulatory Commission,
World Trade Centre, Centre no.1,
13th Floor, Cuff Parade, Mumbai-400 005.

ATTESTED

**CHANDRAKANT B. KAVADE
ADVOCATE & NOTARY
GOVT. OF MAHARASHTRA
PUNE**

Z:\YEAR 2011-12\Provisional RPO 2011-12\CPP\cpp plant for pro.docx

MHADA Commercial Complex, 2nd Floor, Opp. Tridal Nagar, Yerwada, Pune- 411 006.

Tel No.: 020-26614393, 26614403, Fax No. 020-26615031. E-mail : meda@mahaurja.com. Web-site : http://www.mahaurja.com

Page 4



PUDUMJEE

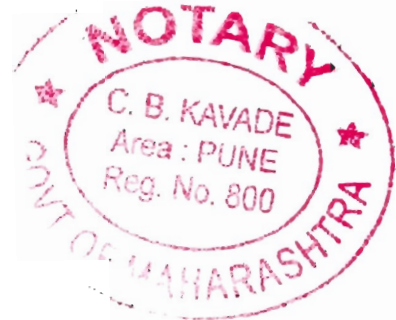
PUDUMJEE INDUSTRIES LTD.
Registered Office

Annexure-2

LKD:Engg:rrt: 9 / /

Date: 01.09.2013

To,
The General Manager (REC, R&D)
Maharashtra Energy Development Agency (MEDA)
MHADA Commercial Complex,
2nd Floor, Opp. Tridal Nagar,
Yerwada, Pune – 411 006



Sub: Eligibility criteria for RPO

Ref: 1. Our letter No. LKD:Engg:rrt:2039 dated 25.03.2013
2. Our letter No. LKD:Engg:rrt:465 dated 10.06.2013
3. Meeting on RPO Obligation of CPP/OA Consumers on 22.08.2013 at MEDA, Pune

Dear Sir,

With reference to the clause 5.1 of MERC RPO-REC Regulations, 2010 dated 7th June, 2010 and recent MERC order in Case No. 49 of 2013 dated 22.07.2013 we would like to submit as follows.

1. We have not installed any captive power plant for power generation.
2. We don't consume electricity procured from conventional fossil fuel based generation through open access.

Hon'ble Commission has reproduced its original condition 5.1 (a) and (b) of Regulation 2010 in recent order in Case No. 49 of 2013 dated 22.07.2013 which is very clear and we reiterate that M/s. Pudumjee Industries Limited is not obligated entity.

May we request you now to remove our name from your record under "Obligated entity to meet RPO".

Thanking you, we remain,

Yours faithfully,
For Pudumjee Industries Limited

L. K. Dwivedi
Lalji K Dwivedi
Authorized Signatory



3/9/13

[Signature]

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

Registered Office:
Thergaon, Chinchwad, Pune-411033 Tel: +91-20-30613333
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E-Mail: parte.ashok@pudumjee.com , Web Site : www.pudumjee.com

ATTESTED

[Signature]

CHANDRAKANT B. KAVADE
ADVOCATE & NOTARY
GOVT. OF MAHARASHTRA
PUNE

Page 5