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January 17, 2023

To,
The Secretary,
Maharashtra Electricity Regulatory Commission
World Trade Centre, Centre No. 1
13th Floor, Cuffe Parade, Mumbai- 400005

Sub: Email dated 12th January, 2023 in the matter of Hon'ble MERC clarifications/queries

Ref: TPL Application for Grant of License vide Case No. 1 of 2023

Dear Sir,

This has reference to the aforementioned subject matter regarding clarifications/queries. In this regard, TPL's pointwise response is as under:

1. Sub-rule (2) of Rule 3 of Distribution of Electricity Licence (Additional Requirements of Capital Adequacy, Creditworthiness and Code of Conduct) Rules, 2005 specify that requirement of Capital Adequacy to be considered by excluding the other 'committed investments'. Accordingly, the Petitioner to submit the details of other 'committed investments' with supporting documents.

TPL's Response:

The aggregate Capital Investment considered by TPL for its license applications before Hon'ble MERC is Rs. 15,007 Crs. In addition to same, TPL has Committed Investments of Rs. 11,900 Crs.

In respect of supporting documents of Committed Investments, the Petitioner would like to submit that same is not shared due to commercial sensitivity. The Petitioner trust that same will meet with your requirements.

2. The Petitioner has proposed 'area of supply' which also includes surrounding areas to the Municipal Corporation (which has clear demarcated boundaries). The Petitioner to submit the details of boundaries of such surrounding areas to clearly demarcate (i.e. with identified landmark, such as road, lake, ward boundaries etc. along with GPS coordinates to the extent feasible) the proposed area of supply.

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OFFICE OF THE
MAHARASHTRA ELECTRICITY
REGULATORY COMMISSION
WTC, CUFFE PARADE, MUMBAI - 400 005.
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TORRENT POWER LIMITED

CIN : L31200GJ2004PLC044068

Regd. Office : "Samanvay", 600, Tapovan, Ambawadi, Ahmedabad - 380015, Gujarat, India Phone: 079-26628300 www.torrentpower.com

TPL's Response:

The details of co-ordinates of landmarks at boundaries of the proposed area of supply along with Map is enclosed herewith at Annexure – 1.

3. The Petitioner to submit its Power procurement plan for first five years of operations with projected demand, projected sales, long term procurement, short term procurement, proposed mix of power, RPO fulfilment, power purchase cost and mode of procurement etc.

TPL's Response:

Sales and Demand Projection: The Petitioner has estimated the sales and demand as under for the proposed license area.

Particulars	Year 1	Year 2	Year 3	Year 4	Year 5
Peak Demand (MW)	19	170	333	564	795
Sales (Mus)	67	614	1,201	2,035	2,871

Procurement Plan (incl. RPO)

The Petitioner has considered following assumptions for projection of power purchase quantum:

- Distribution Loss:

Particulars	Year 1	Year 2	Year 3	Year 4	Year 5
Distribution Loss	9.50%	9.25%	9.00%	8.75%	8.50%

- Transmission Losses: Intra-State Transmission Losses @ 3.18%.

Basis above, overall power procurement requirement is as under:

Particulars	Year 1	Year 2	Year 3	Year 4	Year 5
Power Purchase Quantum (MU)	76	699	1,363	2,303	3,241

Since the sales volume is uncertain and will take some time to achieve critical volume, the Petitioner proposes to source power through short term sources including G-TAM/G-DAM or other avenues available, initially. This will also help the Petitioner to fulfill its RPO. It is estimated that RE Power will be available at competitive rates of around Rs. 3.50 per unit whereas conventional power at Rs. 5.50 per unit at State Periphery. Based on above, the estimated Power Procurement Cost is as under:

Particulars	Year 1	Year 2	Year 3	Year 4	Year 5
Power Purchase Cost (Rs. Crs)	41	385	770	1,338	1,936

It may kindly be noted that upon stabilization of demand, the Petitioner will tie up power on long term basis in accordance with the prevailing regulatory framework.

4. It is observed that network rollout is preferred in mostly industrial/ commercial dominated area in the initial years. The Petitioner to submit the criteria for prioritising the specific area in network rollout and also explain in detail as to how its proposed network development would ensure that the issues such as cherry picking of cross subsidizing consumers and selective network laying would be avoided in the network rollout plan in prioritising the area as well as within the area.

TPL's Response:

- In the entire proposed license area, 87% of total consumers are of Residential category. Commercial & Industrial consumers comprises of only 12%. The Petitioner will supply electricity to all the category of consumers including Agriculture consumers without any discrimination.
 - Network rollout plan for the initial years is planned in prominent areas having moderately high residential density, such areas are considered for network rollout in the proposed license area. This has been explained in the Business Plan, the areas include Juchandra, Vasai, Safale, Aliyali, Dombivli East & West, Lodha, Palava, Ambernath, Badlapur, Vasant Vihar, Lokmanya Nagar, Kolshet etc. which are predominately residential areas including slums / villages. 87% of the total consumers in the said area are of Residential category and 0.44% are of Agriculture category.
 - Based on above and looking at geography of the proposed area, the consumers of all categories are spread in such a way that the proposed network rollout plan addresses the apprehension of discrimination or cherry picking of cross subsidizing consumers and selective network laying.
 - The network will be laid in such a manner that TPL will be in a position to supply electricity to any consumer within the proposed licence area who applies to TPL.
 - Upon completion of proposed Network roll out plan, any consumer who applies to TPL, supply shall be released as per prevailing MERC Regulations/protocols.
- 5. The Petitioner has proposed network rollout in certain areas for which licence is applied in 3rd, 4th, 5th year. The Petitioner to submit how it proposes to supply to the consumers in the said area after grant of licence if the application is received prior to the network roll out proposed by TPL.**

TPL's Response:

Once proposed Network roll out plan is completed for any area, any consumer who applies to TPL, supply shall be released irrespective of category within the timelines prescribed by the Hon'ble Commission in its Regulations. Further, if consumer approaches for supply of electricity before the completion of network roll out plan in any area, the Petitioner will consider such applications and release the supply of electricity to the consumers in accordance with the prevailing Rules & Regulations of the Hon'ble Commission.

We trust that the above meets with your requirements.

For, Torrent Power Limited



Chetan Bundela
Vice President (Corporate Affairs)

Encl: As above

Details of Latitude-Longitude for Thane-Palghar Area

Taluka	Landmark	Marks	Latitude	Longitude
Palghar	Near Vihang Vihar Resort	P1	19°30'22.07"N	72°45'35.68"E
	Near Paramhans Ashram	P2	19°40'40.88"N	72°42'22.78"E
	-	P3	19°51'29.03"N	72°38'48.07"E
	-	P4	19°51'55.00"N	72°42'52.89"E
	-	P5	19°51'28.40"N	72°50'54.40"E
	Near Somate Village	P6	19°50'43.29"N	72°58'27.00"E
	-	P7	19°44'35.10"N	72°58'4.98"E
Wada	Near Green Valley	W1	19°43'6.62"N	72°58'34.33"E
	Near Shubmann Villa	W2	19°40'44.18"N	73° 5'35.00"E
	-	W3	19°46'39.21"N	73°10'36.73"E
	-	W4	19°48'5.26"N	73°18'9.57"E
	-	W5	19°44'8.38"N	73°19'40.25"E
	Near Vaghya Dev	W6	19°41'19.30"N	73°17'2.32"E
	-	W7	19°37'24.50"N	73°16'56.69"E
	Near Nehal pada	W8	19°33'25.45"N	73°12'28.51"E
Bhiwandi Taluka	Ghotvade village	BH1	19°29'4.00"N	73°10'30.13"E
	Palakhane Village	BH2	19°25'14.63"N	73° 5'27.81"E
Vasai- Virar	-	VV1	19°23'55.93"N	72°57'37.27"E
	Sargam Water Park	VV2	19°18'53.93"N	72°56'42.15"E
	SHM Shipcare	VV3	19°17'32.29"N	72°54'12.25"E
	-	VV4	19°22'27.25"N	72°45'24.65"E
TMC	-	TM1	19°15'5.91"N	73° 0'2.93"E
	Gaimukh	TM2	19°15'39.30"N	72°52'44.57"E
	-	TM3	19°13'53.37"N	72°54'55.02"E
	Near Shree Ayyapa Mandir	TM4	19°11'26.61"N	72°56'34.74"E
	Wagle estate Post office	TM5	19°11'8.33"N	72°57'22.02"E
	Swami Samarth Math	TM6	19°10'28.62"N	72°58'58.50"E
	-	TM7	19°11'51.44"N	73° 4'2.11"E
	Palava City	TM8	19°10'8.10"N	73° 4'10.16"E
Ambernath	-	AM1	19° 8'25.86"N	73° 6'28.79"E
	-	AM2	19° 3'37.24"N	73°15'13.41"E
	-	AM3	19° 5'13.28"N	73°17'8.25"E
	-	AM4	19° 4'17.76"N	73°17'56.46"E
	-	AM5	19° 8'55.91"N	73°22'11.99"E
Kalyan	-	K1	19°13'43.35"N	73° 4'1.26"E
	-	K2	19°15'57.48"N	73° 8'26.10"E
	-	K3	19°20'13.76"N	73°11'25.02"E
	-	K4	19°23'18.30"N	73°14'20.45"E
	-	K5	19°24'11.36"N	73°16'21.41"E
	-	K6	19°19'57.50"N	73°16'35.87"E
	-	K7	19°19'18.51"N	73°17'39.56"E
	-	K8	19°14'56.58"N	73°18'30.09"E

PROPOSED LICENCE AREA vis-a-vis TOTAL AREA

