



Vikas Potil

191/6

5th December, 2017
CREG/MUM/MERC/2017/279

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

MERC		
Inward No: 9080	Date: 6/12/17	
Chairman	Member	Member
Secretary	Executive Director	
Director (EE)	Director (T)	

A
7/12/17

Dear Sir,

Subject: Compliance to Renewable Purchase Obligation of Tata Power-D for FY 2016-17

Ref to your letter: MERC/RE CELL//RPO/2016-17/4745 dated 21st November, 2017

This has reference to the above mentioned letter regarding Verification and Compliance of the Renewable Purchase Obligation (RPO) targets of Tata Power-D for FY 2016-17, as specified under MERC (Renewable Purchase Obligation, its compliance and Implementation of REC framework) Regulations, 2016, wherein responses have been sought to the various queries raised.

We have enclosed our point wise Response on the same as **Appendix** to this letter.

We trust this satisfies your requirement.

Yours Faithfully,

Bhaskar Sarkar
Head - Regulatory

Encl - **Appendix**

TATA POWER

The Tata Power Company Limited

Backbay Receiving station, Regulation Department 148 Lt Gen J Bhosale Marg Nariman Point Mumbai - 400 021

Tel 91 22 6717 2903

Registered Office Bombay House 24 Homi Mody Street Mumbai - 400 001

CIN : L28920MH1919PLC000567 Website : www.tatapower Email : tatapower@tatapower.com

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Appendix

Verification and Compliance of Renewable Purchase Obligation targets of Tata Power -D for FY 2016-17

Our point wise response to the queries raised by the Hon'ble Commission regarding RPO Compliance is as follows:

- a) TPC-D should verify the RPO settlement details for FY 2016-17, as submitted by MEDA (copy attached as Annexure with this letter) and highlight discrepancies, if any, along with proper justification.

Response

We have verified the data submitted by MEDA regarding RPO for FY 2016-17 and brought out the discrepancies in a comparison table provided below:

Table 1: Discrepancy in the RPO data for FY 2016-17

Particulars		Requirement @ InSTS	Non- Solar Target	Mini / Micro Hydro target	Solar Target	Non- Solar Achieved	Mini / Micro Hydro Achieved	Solar Achieved
FY 2016-17								
% obligation			10.00%	0.02%	1.00%			
Data submitted by MEDA	1	4,641.2680	464.1268	0.9283	46.4126	469.29	2.48	50.98
As per Tata Power-D	2	4,638.5739	463.8574	0.9277	46.3857	469.41	2.48	50.98
Discrepancy	3=1-2	2.6941	0.2694	0.0005	0.0269	-0.12	0.00	0.00

As seen from Table 1, there are minor discrepancies between the data submitted by MEDA and that of Tata Power-D. The discrepancies are explained further below:

- i) The difference in Energy Requirement of Tata Power-D at InSTS in FY 2016-17 as compared to MEDA is on account of the fact that
- Changeover Sales have been revised based on the monthly settlement of energy between Tata Power-D and RInfra-D
 - Transmission loss figures have been revised based on the revision from MSLDC.

Further, we wish to submit that the energy requirement will be finalized once the final FBSM bills will be issued by MSLDC.

Keeping this in mind, the revised provisional Energy Requirement of Tata Power-D at InSTS in FY 2016-17 is 4638.57 MUs.

ii) The discrepancy in the RPO targets is primarily arising out of discrepancy in the InSTS requirement of Tata Power-D as explained above.

iii) The discrepancy in the RPO Achievement for Non-Solar can be attributed to the change in Non-Solar achievement due to receipt of final wind credit notes which were pending at the time of submission of audited RPO achievement data to MEDA (i.e. on 15th May, 2017). We have now received all the final wind credit notes except for Sadawaghapur wind farm for the month of February and March 2017 and hence, we request the Hon'ble Commission to consider the Non-Solar RPO achievement as mentioned in this submission as the final figures. Further, we wish to submit that once the pending credit notes are received, we will re-submit the updated Non-Solar RPO achievement status.

b) *TPC-D should submit the status of its Solar, non-Solar RPO compliance including Mini-Micro Hydro RPO compliance, as per the directives of the Commission vide Orders in Case No. 182 of 2013, Case No. 192 of 2014 and Case No. 18 of 2016 and Case No. 171 of 2016 along with detailed statement for project wise energy procurement in MUs from all RE generating projects and project wise contracted Solar, non-Solar RE power capacity in MW including Mini-Micro Hydro projects, capacity in MW during FY 2010-11 to FY 2016-17.*

Response

Solar RPO Compliance

FY 2010-11 to FY 2015-16

In the case of Solar RPO obligation, Tata Power-D had already met the cumulative shortfall of FY 2010-11 to FY 2013-14 in the year FY 2015-16. Further, the standalone Solar RPO target for FY 2014-15 was already met in the same year. The same has been approved by the Hon'ble Commission in its Order dated 16th June, 2017 in Case No. 171 of 2016. The extract of the order is given below:

"17. The Commission notes that Tata Power-D has

- 1) fulfilled its stand-alone Solar RPO target for 2015-16, with a surplus of 44.05 MUs, and a cumulative surplus of 0.22 MUs for the period from FY 2010-11 to FY 2015-16;.."*

As seen from the above Tata Power-D has fulfilled the cumulative target upto FY 2015-16.

FY 2016-17

As mentioned previously, Tata Power-D has met the Solar RPO target for FY 2016-17 and has a standalone surplus of **4.60 MUs**. The detailed project wise summary of energy procurement in MUs from all Solar Generating Stations including energy procurement through REC is as given below:

Table 2: Source wise Solar Generation from FY 2010-11 to FY 2016-17

Resources	Contracted Capacity	FY 2010-11	FY 2011-12	FY 2012-13	FY 2013-14	FY 2014-15	FY 2015-16	FY 2016-17
UoM	MW	MUs	MUs	MUs	MUs	MUs	MUs	MUs
Mulshi Solar	3 MW	0.05	4.03	4.33	4.05	4.12	4.34	4.00
Solar Rooftop	60 kWp	-	0.09	0.07	0.06	0.07	0.07	0.04
Palaswadi Solar	25 MW	-	-	-	-	38.16	47.63	46.86
Net Metering								0.08
REC Certificate - Solar	-	-	-	0.31	1.57	9.00	22.10	0.00
Total		0.05	4.12	4.70	5.68	51.35	74.15	50.98

The standalone Solar RPO target for FY 2016-17 is 46.39 MUs and the standalone Solar RPO achievement is 50.98 MUs resulting in a standalone surplus of 4.60 MUs as shown below:

Table 3: Cumulative Shortfall/(Surplus) in Solar RPO

Particulars		Mus						
		FY 2010-11	FY 2011-12	FY 2012-13	FY 2013-14	FY 2014-15	FY 2015-16	FY 2016-17
Opening	a	0	11.50	22.69	35.36	63.91	43.83	-0.22
Solar Target	b	11.55	15.31	17.37	34.22	31.30	30.10	46.39
Solar RPO met	c	0.05	4.12	4.7	5.68	51.38	74.15	50.98
Standalone Shortfall/(Surplus)	d=b-c	11.50	11.19	12.67	28.54	-20.08	-44.05	-4.60
Cumulative Shortfall/(Surplus)	e=a+b-c	11.50	22.69	35.36	63.91	43.83	-0.22	-4.82

From the above table, it can be observed that Tata Power-D has met its cumulative shortfall for the previous years and is now having a cumulative surplus. We request the Hon'ble Commission to approve the same. We will separately approach the Hon'ble Commission for certification of this excess Solar RPO purchase of 4.60 MUs for issuance of RECs as per CERC REC (Third Amendment) Regulations, 2014.

Non-Solar RPO Compliance

FY 2010-11 to FY 2015-16

In case of Non Solar RPO obligation Tata Power-D had already met the cumulative shortfall in the year FY 2013-14 & standalone target for FY 2014-15. The same has been approved by the Hon'ble Commission through its Order in Case 192 of 2014 dated 27th April 2015 & in Case 18 of 2015 dated 31st August 2016. The extract of the two Orders are as given below:

Case 192 of 2014 dated 27th April 2015

"The Commission notes that TPC has fulfilled its Non-Solar RPO targets, but not its Solar RPO and Mini/Micro Hydro Power (within the Non-Solar) RPO targets, for FY 2013-14. TPC has also fulfilled its Non-Solar RPO target by 2013-14, and exceeded its Non-Solar RPO target for FY 2013-14 by 8.56 MUs."

Case 18 of 2015 dated 31st August 2016

"As will be seen from the above Table, TPC-D has fulfilled its stand-alone Solar and Non-Solar RPO targets for FY 2014-15, with a surplus of 20.08 MUs and 2.42 MUs respectively, but not the Mini /Micro Hydro Power target (within the Non- Solar RPO), with a stand-alone shortfall of 1.06 MUs. Including past years, at the end of FY 2014-15 TPC-D had a cumulative surplus of 12.18 MUs against its Non- Solar RPO targets, and a cumulative shortfall against its Solar and Mini /Micro Hydro targets of 43.83 MUs and 3.44 MUs, respectively."

In the case of FY 2015-16, Tata Power-D has already met the Non-Solar RPO target with standalone surplus of 1.89 MUs and the Hon'ble Commission has approved the same in its Order dated 16th June, 2017 in Case No. 171 of 2016. The extract of the Order is provided below:

"17. The Commission notes that Tata Power-D has

.....

3) fulfilled its stand-alone Non-Solar RPO target for FY 2015-16 , with a surplus of 1.89 MUs, and also has a cumulative surplus of 14.07 MUs

FY 2016-17

In case of FY 2016-17 the detailed project wise summary of energy procurement in MUs from all Wind Generating Stations including energy procurement through REC is as given below:

Table 4: Project Wise Summary of Energy Procurement from Wind Generating Stations including energy procurement through RECs

Resources	Contracted Capacity	FY 2010-11	FY 2011-12	FY 2012-13	FY 2013-14	FY 2014-15	FY 2015-16	FY 2016-17
UoM	MW	MUs	MUs	MUs	MUs	MUs	MUs	MUs
Supa	17	22.96	19.63	-	-	-	-	-
Nivede	20.95	-	-	30.41	23.71	-	-	-
Khandke	50.4	96.43	108.41	110.32	113.94	97.16	98.74	84.29
Bramhanvel	11.25	16.03	17.09	18.98	18.07	16.94	17.96	20.16
Sadawaghapur	17.5	26.18	32.14	31.36	29.31	26.00	25.74	32.16
Visapur 6 MW	6	-	12.75	11.94	13.06	11.65	10.89	11.82
Visapur 4 MW	4	7.42	7.59	7.47	7.39	6.17	6.45	7.10
Visapur (GSW) 24 MW	24	-	-	-	-	8.65	30.11	35.08
Visapur (GSW) 8 MW	8	-	-	-	-	1.65	10.10	10.45
Agaswadi	49.5	-	29.33	112.28	113.88	100.64	98.57	104.05
Bilateral	-	50.14	-	-	-	-	-	-
REC	-	-	188.39	261.00	271.00	264.56	215.08	164.28
Total		219.17	415.33	583.76	590.37	533.42	513.66	469.39

As seen from the above Tata Power-D has met the total requirement of Non Solar RE obligation for FY 2016-17 through procurement of RE power to the tune of 305.11 Mus & balance through 164.28 MUs through REC purchase.

305.11
164.28
469.39

Mini/Micro Hydro RPO Compliance

The status of cumulative compliance of Mini / Micro Hydro Plant is as given in the table below:

Table 5: Status of Mini/Micro Hydro RPO Compliance till FY 2016-17

Particulars	Mus							
	FY 2010-11	FY 2011-12	FY 2012-13	FY 2013-14	FY 2014-15	FY 2015-16	FY 2016-17	
Opening	a	0	0.27	0.68	1.22	2.38	3.45	1.55
Mini-Micro Hydro RPO Target	b	0.27	0.41	0.54	1.16	1.06	1.02	0.93
Mini-Micro Hydro RPO met	c	0	0	0	0	0	2.92	2.48
Standalone Shortfall/(Surplus)	d=b-c	0.27	0.41	0.54	1.16	1.06	-1.90	-1.55
Cumulative Shortfall/(Surplus)	e=a+b-c	0.27	0.68	1.22	2.38	3.45	1.55	0.00

Cumulative shortfall from FY 2010-11 to FY 2015-16 & FY 2016-17

As seen from the above table the opening balance for cumulative shortfall upto FY 2015-16 was 1.55 MUs. In this regard, we wish to submit that, the Hon'ble Commission has in its Order 171 of 2016, dated 16th June 2017 allowed Tata Power-D to purchase Non-Solar RECs in the FY 2016-17 to meet the cumulative shortfall of 1.55 MUs remaining for the period till FY 2015-16.

In view of this Tata Power-D has met the cumulative short fall in its Mini/Micro Hydro RPO compliance shortfall till FY 2015-16 through purchase on Non-Solar RECs during the year FY 2016-17. The extract of the Order 171 of 2016 is reproduced below:

"18. In its earlier Order in Case No 18 of 2016 dated 31 August, 2016 (on RPO compliance verification for FY 2014-15), the Commission had allowed Tata Power-D to compensate for the shortfall against its Mini/Micro Hydro RPO targets by purchase of Non-Solar RECs to that extent in FY 2016-17 to meet any shortfall still remaining for the period upto FY 2014-15. The Commission notes that Tata Power-D has made efforts to procure energy from Mini/Micro Hydro Projects prior to and during FY 2015-16 by floating tenders three times, lastly in November, 2016 but has not received any response. By purchasing additional Non-Solar RECs equivalent to 2.92 MUs, it has fulfilled its stand-alone Mini/Micro Hydro RPO target for FY 2015-16 with a surplus of 1.90 MUs. However, it still has cumulative shortfall of 1.55 MUs which can be met in FY 2016-17."

- c) TPC-D should submit detailed list of actions and efforts undertaken by it prior to and during FY 2016-17 to ensure compliance of its RPO targets in respect of Solar RPO, Non-solar RPO and Mini/Micro hydro RPO for FY 2016-17.
- d) TPC-D should submit the details for long term RE procurement plan for meeting the RPO targets for FY 2017-18.

Response

Solar RPO

With respect to Solar RPO, we wish to submit that, Tata Power-D has met the standalone target of FY 2016-17 of 46.39 MUs. Further, Tata Power-D has certain contracted capacity which will be used to meet Solar RPO for FY 2017-18 as shown in Table 6 below.

Table 6: Long Term Power Purchase Agreements from Solar Renewable Sources

Sources	Contracted Capacity (MW)
Solar	
Mulshi	3.00
Carnac Roof Top	0.06
Palaswadi	25.00
Total	28.06

Further, as explained earlier till the sale of Tata Power-D has not stabilized any expected shortfall shall be met by purchase of Solar RECs, which are abundant and available at a low cost, on the Exchange.

The Hon'ble Commission is also aware that the sales of Tata power-D is inclusive of sales from changeover consumer which is depend on tariff differential of another parallel licensee. Hence, additional tie up is depend upon the actual realization of sales post MYT Tariff Order. Tata Power-D will tie up additional long term capacity to meet its Solar requirement considering the above aspect.

In addition to the above, the Hon'ble Commission in its Order dated 16th June, 2017 in Case No 171 of 2016, has allowed Tata Power-D to explore the option of obtaining tradeable RECs against excess over the RPO target by applying to the Central Agency. The extract of the Order is as given below:

"19. As regards the stand-alone and cumulative surplus against the Solar and Non-Solar RPO as at the end of FY 2015-16, the Commission notes that the Central Electricity Regulatory Commission (CERC) REC Regulations (Third Amendment) dated 30 December, 2014 provides the 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. In pursuance of its Order dated 11 January, 2016 in Case No 39 of 2015, the Secretariat of the Commission has issued certificates in the prescribed format to enable Reliance Infrastructure Ltd. to approach the Central Agency accordingly in respect of the excess over its Solar and Non-Solar RPO targets in FY 2013-14 and FY 2014-15. Tata Power-D may explore this option in the first instance."

With regards to this, Tata Power-D has requested the Hon'ble Commission to certify the excess Solar purchase of 0.22 MUs for issuance of REC's as per the CERC REC (Third Amendment) Regulations, 2014. Tata Power-D will follow the process as per the CERC REC (Third Amendment) Regulations, 2014 and will utilize these RECs in FY 2017-18 or in future years as required.

Non Solar RPO

Tata Power-D has met the Non-Solar obligation for FY 2016-17. Further, Tata Power-D has sufficient contracted capacity already tied up to meet Non-Solar RPO for FY 2017-18 as shown in Table 7 below. Further, as explained earlier till the sales of Tata Power-D has not stabilized any expected shortfall shall be met by procuring Non-Solar RECs on the Exchange.

Table 7: Long Term Power Purchase Agreements from Non-Solar Renewable Sources

Sources	Contracted Capacity (MW)
Khandke	50.4
Bramhanvel	11.25
Sadawaghapur	17.5
Visapur 6 MW	6
Visapur 4 MW	4
Visapur (GSW) 24 MW	24
Visapur (GSW) 8 MW	8
Agaswadi	49.5
Total	170.65

Further, the Hon'ble Commission in its Order dated 16th June, 2017 in Case No 171 of 2016, has allowed Tata Power-D to explore the option of obtaining tradeable RECs against excess over the RPO target by applying to the Central Agency.

With regards to this, Tata Power-D has requested the Hon'ble Commission to certify the excess Non-Solar purchase of 1.89 MUs for issuance of REC's as per the CERC REC (Third Amendment) Regulations, 2014. Tata Power-D will follow the process as per the CERC REC (Third Amendment) Regulations, 2014 and will utilize these RECs in FY 2017-18 or in future years as required.

Mini/Micro Hydro RPO

In line with the directives of the Hon'ble Commission, Tata Power-D has taken significant efforts to procure energy from Mini/Micro Hydro projects in FY 2016-17, which have been elaborated further below:

- a) Tata Power-D had floated a tender on 24th November 2016 (**Annexure I**) for procurement of Mini/Micro Hydro power for which it has received no responses.
- b) Meanwhile, Tata Power-Generation (Tata Power-G) is exploring the development of Mini/Micro Hydro projects at its Hydro Generating Plants. As and when these projects

fructify, Tata Power-D proposes to tie up these capacities for meeting the Mini/Micro Hydro RPO.

- c) Any shortfall in Mini/Micro Hydro RPO achievement in FY 2017-18 will be met through purchase of Non-Solar RECs.



EOI No. PP- 02/ Tata Power/ 2016-17

Dated: 24.11.2016

**Expression of Interest for Procurement of Mini/ Micro Hydro
Renewable Power for FY- 17**

The Tata Power Company Ltd. (Herein after referred as 'Tata Power') , a distribution licensee supplying electricity in the Mumbai City, intends to procure power from Mini/ Micro Hydro Renewable Energy Sources to meet their Renewable Purchase Obligation as per MERC regulation 2016 on Renewable Purchase Obligation, its compliance and implementation of REC framework dated 30th March, 2016.

Tata Power intends to procure up to 1.02 Million Units from Mini / Micro Hydro renewable energy sources for meeting the Renewable Power Obligation, for the financial year 2016-17. Offers are invited from Mini / Micro Hydro RE developers or Traders or any utility or industry to supply power generated through Mini / Micro Hydro Renewable Energy Sources, at a rate as approved by MERC order dated 29th April 2016, under case no-45 of 2016 or the relevant orders of MERC .

The offers with details as per Annexure "B" with acceptance of terms and conditions of Tata Power as given in Annexure "A" shall be submitted in a sealed envelope to the following address on or before 1400 hrs on 15.12.2016.

Head,
Power System Control Center,
The Tata Power Company Ltd
Trombay Thermal Power Station 'A'
Mahul Road, Chembur,
Mumbai - 400 074.
Phone No: 022 - 67175377
Fax: 022 - 67175385

Head - PSCC

TATA POWER

The Tata Power Company Limited

Power System Control Center Trombay Thermal Power Station Mahul Road Chembur Mumbai 400 074

Tel 91 22 6668 7091 2554 3331 Fax 91 22 2554 1908

Registered Office : Bombay House 24 Homi Mody Street Mumbai 400 001



ANNEXURE "A"

Terms and conditions

- 1) Only Grid connected RE generation projects are eligible to meet RPS Obligation of distribution licensees. The responsibility of metering and certified meter reading shall be of supplier and would be as per relevant Regulation of the Commission as applicable.
- 2) As per MERC (Terms and Conditions for determination of RE Tariff) Regulations, 2015 dated 10th Nov 2015, 'Mini/Micro Hydro' means Hydro Power projects with a station capacity up to and including 1 MW. Hence offers from such eligible projects only will be accepted.
- 3) The rate offered shall be as per the Tariff approved in MERC order dated 29th April 2016, under case no-45 of 2016, determining the tariff for various RE sources or the relevant order of MERC depending on the year of commissioning of the plant. In case of revision in tariff by MERC same shall be applicable as per relevant MERC order.
- 4) Tata Power reserves the right to reject any or all the offers without assigning any reasons what so ever. It is also not binding on Tata Power to disclose any analysis report on offers. Once the acceptance of the offer is conveyed, the Trader(s)/Supplier would be bound to supply the power as per the contract. Tata Power reserves the right to enter into letter of agreement with one or more of the supplier and decide the quantum of power.

ANNEXURE "B"

Details of information to be included in the offer for Purchase of Mini/ Micro Hydro Renewable Power .

1. Name and address of the Mini/Micro Hydro RE source :
2. Contact details :
3. Date of commissioning :
4. Location of the project :
5. Installed capacity (MW):
6. Capacity intended for sale(MW)under this offer :
7. Whether the firm is availing accelerated depreciation benefit?:
8. Period of supply :
9. Point of Injection:
10. Voltage level at injection point :
11. MUs offered under this EOI :
12. Offer price and break up if any :

Seal and signature of Bidder

Affidavit on behalf of The Tata Power Company Ltd

In the matter of: Verification and Compliance of Renewable Purchase Obligation targets of Tata Power -D for FY 2016-17 as specified under MERC (RPO-REC) Regulations, 2016.

I, Mr. Bhaskar Sarkar, son of Mr. Arup Kumar Sarkar, aged 52 years, Head - Regulatory of The Tata Power Company Limited ("Tata Power"), having my office at Backbay Receiving Station, 148, Lt. Gen. J. Bhonsle Marg, Nariman Point, Mumbai 400 021, Maharashtra, India, do hereby state on solemn affirmation as under:-

1. I state that I am the authorized signatory of Tata Power and as such I am fully conversant with the facts and circumstances of the present case and I am duly authorized and competent on behalf of Tata Power to swear and affirm this Affidavit.

2. I state that, I have read and understood the accompanying Submissions and the same has been drafted under my instructions and after carefully going through the same, I state that the content of the same are true and correct to my knowledge and belief and it is stated that no part of it is false and nothing material has been concealed there from.

3. I state that, the Annexures along with the accompanying Submissions, if any, are true copies of their respective originals.

Ms. ROSHAN M. MASTER
NOTARY, GREATER BOMBAY
2403, ORCHID TOWER A
BELLASIS ROAD,
MUMBAI - 400 008.

DEPONENT



17/11/20

Affidavit on behalf of Tata Power Company Ltd

In the matter of Verification and Compliance of Renewable Purchase Obligation targets of Tata Power - B for FY 2019-20 as specified under MREC (RPO-RSC) Regulation 2016.

I, Mr. Roshan Master, son of Mr. Anup Kumar Master, aged 32 years, Head - Regulatory of Tata Power Company Limited ("Tata Power"), having my office at Backbay Receiving Station, 148, Lt. Senapati Bhabha Road, Mumbai-400 011, Maharashtra, India, do hereby state on solemn affirmation that:

I state that I am duly authorized and empowered by the Board of Directors of Tata Power and as such I am fully conversant with the facts and circumstances of the present case and I am duly authorized and empowered by the Board of Directors of Tata Power to swear and affirm this Affidavit.

Ms. ROSHAN M. MASTER
NOTARY, GREATER BOMBAY
2403, ORCHID TOWER A
BELLASIS ROAD,
MUMBAI-400 008.

I state that I have read and understand the contents of the Affidavit and the same has been drafted under my hand and seal through the same. I state that the content of the Affidavit is true to my knowledge and belief and it is stated that no part of it is false and nothing material has been concealed there from.

I state that the Affidavit along with the accompanying Subsection, if any, are true copies of their respective originals.



[Signature]

DEPONENT

Ms. ROSHAN M. MASTER
NOTARY, GREATER BOMBAY
2403, ORCHID TOWER A
BELLASIS ROAD,
MUMBAI-400 008.

VERIFICATION

I, the deponent above named, do hereby verify that the contents of my above Affidavit are true and correct, no part of it is false and nothing material has been concealed therefrom.

Verified at Mumbai on this 5th day of December, 2017.



[Handwritten signature]

DEPONENT

Before me

R. M. Master

**Ms. ROSHAN M. MASTER
NOTARY, GREATER BOMBAY
2403, ORCHID TOWER A
BELLASING ROAD,
MUMBAI - 400 008.**

Reg. No. 404

**Commission Expires
on 30.11.2021**

*S. no 10/2205 of
5.12.2017
E19-217*



17219

VERIFICATION

I the deponent above named do hereby verify that the contents of my above Affidavit are true and correct, no part of it is false and nothing material has been concealed therefrom. Verified at Mumbai on this 2nd day of December, 2021.



[Handwritten signature]

DEPONENT

Before me

[Handwritten signature]

MR. ROSHAN M. MASTER
NOTARY, GREATER BOMBAY
2403 ORCHID TOWER A
BELLASIS ROAD,
MUMBAI - 400 008.
Reg. No. 404

Commission Expires
on 30.11.2021

2. no 10/22027
2.12.21



Ms. ROSHAN M. MASTER
NOTARY, GREATER BOMBAY
2403, ORCHID TOWER A
BELLASIS ROAD,
MUMBAI - 400 008.