

**BEFORE THE HON'BLE TELANGANA STATE ELECTRICITY
REGULATORY COMMISSION,
AT ITS OFFICE AT V FLOOR, SINGARENI BHAVAN, RED HILLS,
HYDERABAD.**

O.P.NO. 9 of 2024 (Suo-Moto)

In the matter of: Suo-Moto Determination of Compliance of Renewable Power Purchase Obligation ("RPPO") of Obligated Entities for FY 2022-23.

Objector:

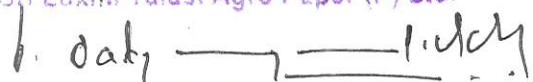
M/s. Sri Luxmi Tulasi Agor Paper Ltd.,

...Objector

OBJECTIONS FILED BY THE OBJECTOR HEREIN

1. It is humbly submitted that the State Agency under Regulation No.7 of 2022, SLDC, while determining compliance for the FY 2022-23, has stated in its Lr.No. CE/SLDC/REC/F.RPPO/D.No.211/24 dt.04.06.2024 that it had issued an email dt.04.05.2024 to all the entities mentioned in the statement annexed thereto, however no such mail has been received by the Objector.
2. It appears that the SLDC has shown at Sl.No.4 therein, against the Objector's HT SC No.BKM-049 that it has consumed 42991.80 MWH from a fossil fuel generator, and has shown RPPO thereof.
3. It is submitted that this Hon'ble Commission has framed Regulation No.7 of 2022 above with effect from 01.04.2022. Clause 2(p)(ii) therein specifies an Obligated Entity to mean *inter-alia* a Captive User, i.e., any consumer who owns a grid connected CPP based on conventional fossil fuel with installed capacity of 1 MW or above, and consumes electricity generated from such plant for his own use.
4. The proviso thereto states that an obligated entity which consumes power in any year to the extent of total RPPO specified under Clause 3 from a fossil-fuel based co-generation plant, the same shall be exempted from RPPO.
5. The Objector herein manufactures pulp and paper in its manufacturing unit, and this process requires steam for drying the pulp to form paper.

Sri Luxmi Tulasi Agor Paper (P) Ltd.



(P.SATYANARAYANA REDDY)
Chairman & Managing Director

6. The Objector operates two CPPs as follows:
 - a. Cogeneration Power Plant of 4.0 MW which operates on conventional fuel, i.e., 70% coal & 30% bio-mass,
 - b. Cogeneration Power Plant of 12 MW which operates on conventional fuel, i.e., 70% coal & 25% bio-mass.
7. These captive cogeneration plants generate electricity as well as useful thermal energy in the form of process steam. The process is therefore cogeneration within the definition in Section 2(12) of the Electricity Act, 2003, and the captive generating plants are captive cogeneration plants.
8. The Objector consumes 100% of the power generated from its 4.0 MW & 12 MW captive co-generation plants, i.e., more than 8.5% as specified for FY 2022-23 under Clause 3, as such it is fully exempted from the RPP Obligations.
9. It is submitted that the Objector has already intimated these facts to the SLDC, when it had sought quarterly details of consumption from the Captive Cogeneration Plants.
10. The Objector reserves its right to make further submissions at any stage of the proceedings and to respond by written submissions or otherwise to any oral or written submissions of the SLDC.
11. For the above reasons and for such other or further reasons as may be urged at any stage of the proceedings, it is prayed that this Hon'ble Commission may be pleased to determine that there is no requirement or obligation for the Objector herein to purchase any additional renewable energy or RECs for FY 2022-23.
12. The Objector requests to be heard in person through a representative or through its appointed counsel.

Place: Hyderabad
Date: 27.08.2024

Sri Luxmi Tulasi Agro Paper (P) Ltd.
P. Satyanarayana Reddy
(P.SATYANARAYANA REDDY)
Chairman & Managing Director

OBJECTOR

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(P.SATYANARAYANA REDDY)
Chairman & Managing Director
OBJECTOR

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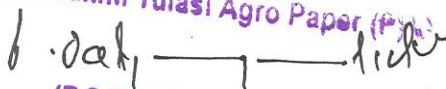
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Date: 27.08.2024

Sri Luxmi Tulasi Agro Paper (P) Ltd.
/ . 0 a t y ————— l i n d y
(P.SATYANARAYANA REDDY)
Chairman & Managing Director
OBJECTOR

BEFORE THE TELANGANA ELECTRICITY REGULATORY COMMISSION
AT HYDERABAD

O.P. No. 09 of 2024 (Suo-Moto)

Between:

Plaintiff
Petitioner

Suo moto (RPPo) Fy 2022-2023

Versus

M/S. Sri Luxmi Tulasi Agro Paper Ltd.

Defendant
Respondent

I/We

M/S. Sri Luxmi Tulasi Agro paper Ltd

do hereby appoint and retain
CHALLA GUNARANJAN
M. SRIDHAR
DEEPAK CHOWDARY
Advocates

Advocate/s to appear for me/us in the above Suit/Case and to conduct and prosecute and defend the same and proceedings, that may be taken in the respect of any application for execution or any Decree or Order passed therein I/We empower my/our Advocate to appear in all miscellaneous proceedings in the above Suit matter till all Decree or Orders are fully satisfied or adjusted to compromise and to obtain the return of Documents and draw any moneys that might be payable to me/us the said suit or of matter and notice I/We do further empower my/our Advocate to accept on my/our behalf, service of all or any appeals or petitions filed in any Court of appeal reference or revision with regard to said suit or matter before the disposal of the same in this Hon'ble Court.

Sri Luxmi Tulasi Agro Paper (P) Ltd.

P. Satyanarayana Reddy

(P. SATYANARAYANA REDDY)

Chairman & Managing Director

Certified that the executant who is well acquainted with English and the Vakalatnama and the contents of the Vakalatnama were read out and explained in Telugu/Urdu/Hindu to the executant or he/she/they being unacquainted with English who appeared to have perfectly understood the same and signed/put his/her/their name or mark in my presence.

Identified by: M. Sridhar Advocate.

Executed on this the 2nd day of August 2024.

S. CHAKRAPANI
Advocate.
ADVOCATE
F-6-60-110/1, Prasant Avenue,
Adj. to BRTS, Hyderabad,
Khyabrat, Hyderabad-500 004,
Call: 9741219009

BEFORE THE TELANGANA
ELECTRICITY REGULATORY
COMMISSION AT HYDERABAD

O.P. No. 09 of 2024 (Suo-Moto)

Between:

Petitioner

And

~~M/S Sri Chaitanya Tulaji~~ Respondent
Agro paper (12
-- Objecy.

VAKALAT

Advocates for: Objector

Filed on: 27-08-24

Address for service of the said Advocate/s

CHALLA GUNARANJAN
Flat No.101 | Krishnaveni Pride |
H.No.8-3-833/204 |
Kamalapuri Colony | Hyderabad |
Telangana 500 073