



Northern Power Distribution Company of Telangana Limited

Corporate Office, # 2-5-31/2, Vidyut Bhavan, Nakkalagutta, Hanamkonda, Warangal – 506 001

From

Chief Engineer,
IPC & RAC,
TG NPDCL/Warangal.

To

The Commission Secretary, TGERC,
#11-4-660, 5th Floor, Singareni Bhavan,
Red Hills, Hyderabad – 500 004.

Lr.No.CE/IPC&RAC/GM(IPC&RAC)/DE(IPC)/AAO/F.RPPO/D.No.292/24,Dt:21.08.2024

Sir,

Sub:-TSNPDCL/IPC Wing – Determination of compliance of RPPO of obligated entities for the period FY 2022-23 under O.P.No. 09 of 2024 Suo-Moto by the Commission – Submission of suggestions/objections/ comments of the NPDCL - Regarding.

Ref:- Public Notice issued by the Hon'ble TGERC Dt:03.08.2024..

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With reference to the cited above, TG NPDCL's suggestions/ objections/ comments on the **Suo-Moto** proceedings for determination of compliance of RPPO of obligated entities in O.P. No. 09 of 2024 are submitted hereunder.

A. The Status of compliance of RPPO of TG NPDCL for FY-2022-23.

Details	Total Energy Consumption	ERC Target		Achieved		(-)Shortfall /Excess Energy	
	MWh	%	MWh	%	MWh	%	MWh
Solar	16688045	7.50%	1251603	15.04%	2510558	7.54%	1258955
Non-Solar		1.00%	166880	0.80%	133204	-0.20%	-33676
Total	16688045	8.50%	1418484	15.84%	2643762	7.34%	1225278

B. TG NPDCL has met the total RE obligation (Solar + Non-solar) of **15.84% (2643762 MWh)** against the TGERC specified total RPPO target of **8.50% (1418484 MWh)** during 2022-23. Thus TG NPDCL excess complied by **1225278MWh** over and above the target by the Hon'ble TSERC for 2022-23.

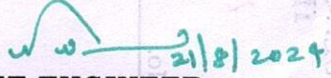
C. It is to submit that CERC has issued Order dated 08.10.2023 in which Forum of Regulator (FOR) deliberated on the issue of "Fungibility of RPO" and unanimously agreed to allow fungibility of RECs to fulfill any RPO specified by the state ERCs and also stated that the obligated entities may approach their respective SERC for appropriate approval in this regard. Forum of Regulator (FOR) also

TSERC HYDERABAD
 INWARD
 27 AUG 2024
 Sign
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requested State ERCs to allow procurement of RECs to fulfill RPO across any RE technology source.

- D.** Further, Andhra Pradesh ERC has already issued Regulation No 5 of 2022, Dt:29.09.2022 duly mentioning the total RPO target to be met as 19% in whole for FY 2023-24 instead of solar and non solar separately.
- E.** In view of request of TGDISCOMs to combine Solar and Non-solar categories into single RPPO obligation to comply with RPPO for the FY 2023-24 and also for further upcoming years, the Hon'ble Commission has approved to allow RECs to meet the requirement of RPPO across any RE technology vide proceeding dated 27.03.2024.
- F.** Further the Hon'ble Commission has also issued the ELEGIBILITY CERTIFICATE to TGNPDCL as per the format 3.5 of the CERC REC Regulations, 2022 for application for obtaining REC's for FY 2023-24 duly considering the combine of Solar and Non-solar categories into single RPPO obligation to comply with RPPO.
- G.** In view of the above, TGNPDCL earnestly request the Hon'ble Commission to combine Solar and Non-solar categories into single RPPO obligation to comply with RPPO for the FY 2022-23 in line with the FY 2023-24 as the both years are covered in same TGERC's RPPO Regulation 7 of 2022.
- H.** Otherwise, the Hon'ble Commission is requested to allow shortfall of 33676 MWh in Non-solar RPPO for the FY 2022-23 set off with the RECs available with TGNPDCL at present.

Yours faithfully,


CHIEF ENGINEER
IPC & RAC/TGNPDCL/WGL

Copy Communicated to:

The Chief Engineer/TGSLDC/TGTRANSCO/VS/Hyderabad – for information please.

Copy Submitted to:

The Director/Grid Operation/ TGTRANSCO/VS/Hyderabad – for favour of information please.