PUNJAB STATE POWER CORPORATION LIMITED



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То

Secretary, Punjab State Electricity Regulatory Commission, Site No.-3, Block-B, Sector 18-A, Madhya Marg, Chandigarh.

Memo No. 397 /ARR/DY.CAO/256/ Deficiencies/Vol-2. Dated. 25|2|2020

Subject: Petition for True-up for FY 2018-19, Annual Performance Review (APR) for FY 2019-2J and MYT for the 2nd Control Period from FY 2020-21 to FY 2022-23-Updated Annexures related to Renewable projects (Reply to Deficiencies dated 13.01.2020).

In continuation to this office Memo No. 385/ARR/DY.CAO/256/ Deficiencies dated 20.02.2020, vide which subject cited information revised as per updated Annexures L, M, N1 to N5, O1,O2 & P were sent to your office as received from the O/o Dy.CE/IPC, (CE/Thermal Design)PSPCL, it is requested to consider the revised updated data regarding RE Power submitted by IPC office instead of data regarding RE Power shown in Format D3 which contains RE Power data projections based on PPAs signed upto July-2019.

Some Key points regarding mismatching of data are as under:-

- a) Data regarding RE Power projects (which are depicted in Format-D3) submitted to this office by the office CE/PPR are based on projections after considering PPAs signed upto July-2019 whereas data through deficiencies has sought in the month of December-2019 from IPC office and in the meantime more PPAs comes into picture for projections.
- b) As IPC cell of PSPCL considers the total energy Exports from RE Power Projects for the purpose of RPO Compliance whereas data given in Format D3 considers Net Energy (energy Export to PSPCL – Energy import by NRSE Project) for billing purpose. For example in FY 2018-19 Total Solar Interstate export energy is 1319.75 MUs (as in annexure N1) and net energy is 1310.65 MUs (as in format D3). It is further clarified that Export energy data has been considered for calculations of RPO purpose which is also approved by PSERC vide its order passed in the petition No. 6 of 2019.

- c) Amount in crores mentioned in annexure N1 to N5 & Annexure L only shows the variable cost whereas variable cost, fixed and other charges, etc. have been shown in Format D3 w.r.t. data regarding RE Power Projects.
- d) Generation data from Solar Rooftop Net metering is not considered in format D3, whereas same has been considered and shown in Annexure-L and N1 to N5 for RPO purpose by IPC office.
- e) Data shown in Format G32 does not match with data shown in Annexure-M (submitted as annexure-B2 received from IPC office). Data of G-32 may be considered final in place data of Annexure-M.
- f) Funds required for the purchase of RECs now shown in Annexure-L & N1 to N5. In this regard, it is submitted that funds required for the purchase of RECs from FY 2019-20 to 20-22-23 may be taken as per Format D-3. However, for FY 2018-19 the amount of Rs. 85.339 crores spent by PSPCL on the purchase of RECs and same may be considered as shown in Annexure-L and N1.

Apart from above, page no. 179 to 183 sent to your office vide this office Memo No. 75/ARR/Dy.CAO/256/Deficiencies dated 13.01.2020 may not be considered, please.

This is for your information, please.

SLover Chief Engineer/ARR & TR, **PSPCL**, Patiala