



**BEFORE THE  
HON'BLE GUJARAT ELECTRICITY REGULATORY COMMISSION  
GANDHINAGAR**

Filing No. \_\_\_\_\_

Case No. \_\_\_\_\_

**IN THE MATTER OF**

Filing of Petition in accordance with the GERC (Conduct of Business) Regulations, 2004 for approval and necessary direction of Hon'ble Gujarat Electricity Regulatory Commission regarding the Status of RPO Compliance for FY 2023-24 by GIFT Power Company Limited as per the provisions of Regulation 4.1 and 4.2 of GERC (Procurement of Energy from Renewable Sources) Regulation, 2010 and its amendments thereof.

**AND**

**IN THE MATTER OF**

**GIFT Power Company Limited**

EPS - Building no. 49A, Block 49, Zone 04,

Gyan Marg, GIFT City, Gandhinagar - 382050.

..... **PETITIONER**

**THE PETITIONER RESPECTFULLY SUBMITS AS UNDER:**

"GIFT Power Company Limited" (hereinafter referred to as "GIFT PCL" or "Petitioner"), files the present Petition regarding RPO Compliance for FY 2023-24.



1. GIFT Power Company Limited (GIFT PCL) is a 100% subsidiary company of Gujarat International Finance Tec-city Company Limited (GIFT CL) incorporated under the provisions of the Companies Act 1956 and having its registered office at EPS - Building no. 49A, Block 49, Zone 04, Gyan Marg, GIFT City, Gandhinagar. GIFT PCL is a distribution licensee for the supply of electricity in the GIFT City area. The Hon'ble Gujarat Electricity Regulatory Commission (hereinafter referred as "Commission" or "GERC") granted the license for distribution of electricity vide its Order dated 6<sup>th</sup> March, 2013 as per License Application No 1/2012 to GIFT Power Company Limited, for catering the power requirement of GIFT City which includes both Domestic Tariff Area (DTA) and Special Economic Zone (SEZ) Area.
2. The Hon'ble Commission in exercise of the powers conferred under Sections 61, 66, 86 (1) (e) and 181 of the Electricity Act-2003 (36 of 2003), has framed the GERC (Procurement of Energy from Renewable Sources) Regulations, 2010 for promoting sale of power from renewable energy sources and for procurement of energy from renewable sources by distribution licensee within the State of Gujarat vide its Notification No. 03 of 2010 dated 17<sup>th</sup> April, 2010 (hereinafter referred to as RPO Regulations). In RPO Regulations, the Hon'ble Commission has specified the minimum percentage for procurement of power from Wind, Solar, Hydro and Other Sources. Subsequently, the Hon'ble Commission issued the First Amendment in March-2014 and Second Amendment in April-2018 for Gujarat Electricity Regulatory Commission (Procurement of Energy from Renewable Sources) Regulations, 2010. Consequently, the Hon'ble Commission has also notified the Third Amendment vide Notification No. 1 of 2022 and dated 8<sup>th</sup> April-2022 for Gujarat Electricity Regulatory Commission (Procurement of Energy from Renewable Sources) Regulations, 2010.
3. As per the aforesaid Regulation, the RPO target specified by the Hon'ble Commission to be fulfilled by the obligated entities during FY 2023-24 is furnished below:

Year	Minimum Quantum of purchase (in %) from renewable energy sources (in terms of energy in KWh)				
	Wind	Solar	Hydro	Others (Biomass, MSW etc.)	Total RPO
2023-24	8.40%	9.50%	0.05%	0.75%	18.70%





4. Petitioner's licensee area is a green field developing area and power requirement has been increasing over past couple of years. During FY 2023-24, the base load of Petitioner was ~ 4 MW and the peak load was ~ 10 MW. The same is expected to be increased to ~ 6 MW & ~ 15 MW respectively by 2025-26.
5. The Volume of Power Purchase transacted by Petitioner is quite low when compared to other distribution licensees. Hence, it was difficult for Petitioner to source power through renewables at a competitive rate as Renewable Purchase Obligation quantum was very less.
6. As approved in the Tariff Order dated 31<sup>st</sup> March-2023 (Case No. 2170 of 2022), the Petitioner had purchased Renewable Energy from Power Exchanges under G-TAM and G-DAM segments. Also, the Petitioner had estimated partial compliance from Solar PV Plants installed in licensee area under Net-Metering Arrangement.
7. The Petitioner has fulfilled RPO Compliance partially during FY 2023-24, due to reasons beyond Petitioner's control and the same are mentioned below:
  - a) Based on the rates approved in Tariff Order, Petitioner has made efforts to purchase renewable energy from G-TAM/G-DAM segments of Power Exchanges but was unsuccessful to fully comply with RPO due to low trading volume and high clearing prices especially during peak hours.
  - b) The Renewable Generators are bidding on a premium rates w.r.to rates discovered at DAM segment based on market dynamics which sometimes became unviable to the Petitioner to source through G-TAM/G-DAM segments. The average price discovered during FY 2023-24 (April-2023 to March-2024) in DAM/G-DAM segments in Power Exchange (IEX) is furnished below:

Particulars	Average Market Clearing Price in FY 2023-24
Day-Ahead Market Segment (IEX)	Rs. 5.24/Unit
Green Day-Ahead Market Segment (IEX)	Rs. 5.81/Unit





8. Accordingly, the Petitioner has attempted to purchase renewable energy through G-TAM/G-DAM segments in IEX at a competitive rate whenever possible during FY 2023-24. The RE generators were selling power on premium basis or to a pre-decided buyer on a specific rate by spot trading. The Summary of category-wise and month-wise details of successful RE purchase are furnished below:

Months	RE Purchase Details in FY 2023-24			
	Solar Energy Purchased (in Units)	Non-Solar Energy Purchased (in Units)	Hydro Power Purchased (in Units)	Power Exchange Purchase Segment
Apr-23	22,170	63,700	360	G-DAM
May-23	0	0	0	N.A
Jun-23	61,410	109,960	21,190	G-DAM
Jul-23	94,380	2,431,020	48,770	G-DAM / G-TAM
Aug-23	69,630	230,910	27,080	G-DAM
Sep-23	41,870	355,510	4,470	G-DAM / G-TAM
Oct-23	74,800	152,470	36,180	G-DAM
Nov-23	65,930	191,570	33,820	G-DAM
Dec-23	60,330	236,640	12,000	G-DAM
Jan-24	63,820	190,800	4,980	G-DAM
Feb-24	90,520	177,960	10,230	G-DAM
Mar-24	745,430	668,540	69,840	G-DAM
<b>Total</b>	<b>1,390,290</b>	<b>4,809,080</b>	<b>268,920</b>	<b>G-DAM/G-TAM</b>
<b>Grand Total RE Purchase (in KWh)</b>		<b>6,468,290</b>		

9. Based on the above representation, Petitioner has considered renewable energy procurement of 6,468,290 Units while accounting RPO for FY 2023-24.
10. The Petitioner would like to submit that Distributed Solar PV Plants are operational in the licensee area and all of them were owned by Consumers under Net-Metering Arrangement in FY 2023-24. The Total Capacity of such Solar PV Plants installed in licensee area under Net-Metering Arrangement is furnished below:

Particulars	Capacity (in KW)
Total Capacity (in KW)	916.30



11. Accordingly, Petitioner submits the details of Solar Generation from the Solar PV Plants installed under Net-Metering Arrangement is tabulated below:

Solar Generation Details under Net-Metering Arrangement in FY 2023-24	
Months	Solar Generation Month-wise
Apr-23	60,761
May-23	64,389
Jun-23	48,764
Jul-23	41,090
Aug-23	40,676
Sep-23	47,043
Oct-23	53,397
Nov-23	45,877
Dec-23	76,633
Jan-24	83,711
Feb-24	80,697
Mar-24	107,068
<b>Grand Total</b>	<b>750,107</b>

12. The energy generated from the Solar Plants installed by Consumers in the Petitioner's licensee area under net metering arrangement i.e., 7,50,107 Units is being taken into consideration while submitting the details of RPO Compliance during FY 2023-24.
13. The Petitioner has considered RE Attributes from Waste to Energy Plant under 'Others RPO Target'. For Waste to Energy projects, the Hon'ble Commission has issued Order on Determination of Generic Tariff and other terms and conditions for Procurement of Power by Distribution Licensees from Municipal Solid Waste to Energy Projects in the State of Gujarat (Order No. 02 of 2024). In the said order the tariff sharing mechanism with cost apportionment or payment of tariff has been outlined in the Gujarat Waste to Energy Policy-2016. Accordingly, the Petitioner has received a bill from GUVNL regarding payment for waste to energy RE Attributes for FY 2023-24. The bill received from GUVNL provides that during FY 2023-24, 8,458 Units have been allocated to GIFT PCL towards RE Attributes from 7.5 MW Waste to Energy (WTE) Project of Goodwatts WTE Jamnagar Pvt. Ltd.

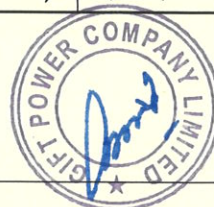
14. Accordingly, Petitioner has considered Waste to Energy Attributes of 8,458 Units while accounting the RPO for FY 2023-24.

15. The Source-Wise and Month-Wise RPO Accounting for FY 2023-24 is furnished below:

Months	RPO Accounting for FY 2023-24				
	Solar Energy (incl. Net Metering Consumers)	Wind Energy	Hydro Power	Other Energy (MSW)	Total RE Accounted
Apr-23	82,931	63,700	360	0	146,991
May-23	64,389	0	0	0	64,389
Jun-23	110,174	109,960	21,190	0	241,324
Jul-23	135,470	2,431,020	48,770	0	2,615,260
Aug-23	110,306	230,910	27,080	0	368,296
Sep-23	88,913	355,510	4,470	0	448,893
Oct-23	128,197	152,470	36,180	0	316,847
Nov-23	111,807	191,570	33,820	0	337,197
Dec-23	136,963	236,640	12,000	0	385,603
Jan-24	147,531	190,800	4,980	0	343,311
Feb-24	171,217	177,960	10,230	0	359,407
Mar-24	852,498	668,540	69,840	8,458	1,599,336
<b>Grand Total</b>	<b>2,140,397</b>	<b>4,809,080</b>	<b>268,920</b>	<b>8,458</b>	<b>7,226,855</b>

16. The Status of RPO Compliance during FY 2023-24 is tabulated below:

Compliance Year	Total Consumption	Particulars	RPO Target	RPO Achieved	RPO % Achieved
FY 2023-24	45,551,134	Solar RPO (9%)	4,327,358	2,140,397	4.70%
		Wind RPO (8.40%)	3,826,295	4,809,080	10.56%
		Hydro RPO (0.05%)	22,776	268,920	0.59%
		Other RPO (0.75%)	341,634	8,458	0.02%
		<b>Total RPO (18.70%)</b>	<b>8,518,062</b>	<b>7,226,855</b>	<b>15.87%</b>





17. Based on the aforementioned backdrop, it is observed that the Petitioner had made sincere efforts to source maximum renewable energy from G-TAM/G-DAM segments whenever the rate is competitive but was un-successful in May-2023 due to high price discovery in Power Exchanges as there was RE supply constraints.
18. As per the GERC Principal Regulations on Procurement of Energy from Renewable Sources-2010, the Petitioner requests Hon'ble Commission to kindly revise the RPO target for compliance in FY 2023-24 due to supply constraints in G-TAM/G-DAM segments and through PPA arrangement. This request is being prayed in accordance with the Regulation 4.2 of the Principal RPO Regulations. The excerpt from the clauses reads as follows:
- "4.2 The Commission may, suo-motu or at the request of a licensee, revise the percentage targets for a year as per clause 4.1 of these Regulations keeping in view supply constraints or other factors beyond the control of the licensee."*
19. The RPO regulations confers the power to Hon'ble Commission for revising the RPO target based on the request of the licensee on account of supply constraints or due to other factors beyond the control of the licensee.
20. Accordingly, keeping in view of the above-mentioned points the Petitioner humbly requests the Hon'ble Commission to revise the RPO targets and kindly exempt us from RPO Compliance of FY 2023-24 due to low RPO quantum and considering the factors of supply constraints / high price discovery in G-TAM/G-DAM segments of Power Exchanges.

## Prayers

**Based on the facts and circumstances mentioned in this Petition, the Petitioner humbly prays this Hon'ble Commission:**

- a. To admit the present Petition for further necessary process.
- b. To revise the RPO targets and exempt the Petitioner for RPO Compliance during FY 2023-24.









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# INDIA NON JUDICIAL Government of Gujarat



सत्यमेव जयते

Book No. 3  
Sr. No. 19  
Date 12/2/2025  
VISHNU S. PATEL  
NOTARY  
GOVT. OF GUJARAT

Rs.  
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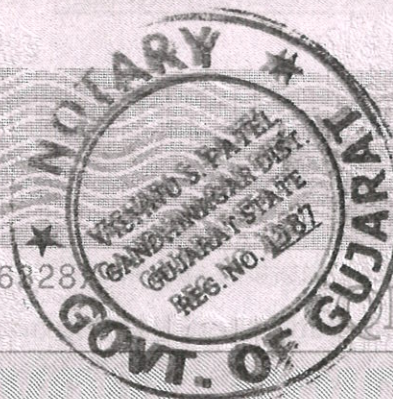
## 12 FEB 2025 Certificate of Stamp Duty

Certificate No. : IN-GJ55460757166328X  
Certificate Issued Date : 12-Feb-2025 12:16 PM  
Account Reference : IMPACC (SV)/ gj13251104/ GANDHINAGAR01/ GJ-GN  
Unique Doc. Reference : SUBIN-GJGJ1325110422475258062394X  
Purchased by : JAY MORE  
Description of Document : Article 4 Affidavit  
Description : AS PER GERC REGULATIONS  
Consideration Price (Rs.) : 0  
(Zero)  
First Party : GIFT POWER COMPANY LIMITED  
Second Party : Not Applicable  
Stamp Duty Paid By : GIFT POWER COMPANY LIMITED  
Stamp Duty Amount(Rs.) : 50  
(Fifty only)



₹50

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### Statutory Alert:

1. The authenticity of this Stamp certificate should be verified at 'www.shcilestamp.com' or using e-Stamp Mobile App of Stock Holding. Any discrepancy in the details on this Certificate and as available on the website / Mobile App renders it invalid.
2. The onus of checking the legitimacy is on the users of the certificate.
3. In case of any discrepancy please inform the Competent Authority.



Affidavit as per Form II of the GERC (Code of Business) Regulation, 2004

BEFORE THE  
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AND

IN THE MATTER OF:

**GIFT Power Company Limited**

EPS - Building no. 49A, Block 49, Zone 04, Gyan Marg,  
GIFT City, Gandhinagar - 382050.



..... PETITIONER



## AFFIDAVIT

I, Arvind Kumar Rajput, son of Shri Ramphersingh Rajput (Late) aged about 57 years residing at Ahmedabad, do solemnly affirm and say as follows:

1. I am working as a Chief Operating Officer in GIFT Power Company Limited, the Petitioner in the above matter and I am duly authorised by the said Petitioner to make this Affidavit.
2. The statements made in paragraphs 1 to 20 of the Petition are herein now shown to me are true to my knowledge and the statements made in paragraphs 7 to 16 are based on information and I believe them to be true.

I hereby solemnly affirm at GIFT City, Gandhinagar on this day of 12<sup>th</sup> February-2025 that the contents of the above Affidavit are true to my knowledge, no part of it is false and nothing material has been concealed therefrom.

For, M/s GIFT Power Company Limited

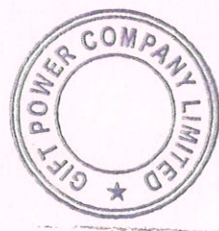
Place: Gandhinagar

Dated: 12<sup>th</sup> February-2025



Arvind Kumar Rajput

Chief Operating Officer



SOLEMNLY AFFIRMED  
BEFORE ME

VISHNU S. PATEL  
NOTARY  
GOVT. OF GUJARAT

12 FEB 2025

IDENTIFIED BY ME

Advocate / Person  
Name :   
Address :

12 FEB 2025

