BEFORE THE DELHI ELECTRICITY REGULATORY COMMISSION
NEW DELHI

CASE NO.....OF 20
PETITION NO.....OF 20

IN THE MATTER OF:
Elephant Energy Private Limited
A-1/136, Third Floor,
Safdarjung Enclave,
New Delhi-110029
India

Petitioner

Versus

New Delhi Municipal Council
Palika Kendra
Parliament Street, New Delhi-110001

Respondents

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PETITIONER

Elephant Energy Private Limited
A-1/136, Third Floor,
Safdarjung Enclave,
New Delhi-110029
India

Place: NEW DELHI
Dated: 30/11/2015

Before The Delhi Electricity Regulatory Commission

New Delhi

FILING NO.:

CASE NO.:

(To be filled by the Office)

IN THE MATTER OF:

Section 86 (1) (e) read with Sections 61, 62, 64 and other applicable provisions of the Electricity Act, 2003.

AND

IN THE MATTER OF:

The Petitioner is seeking the determination of a feed in tariff by the Hon'ble Commission for sale of power from Municipal Solid Waste to the New Delhi Municipal Council as per the notice of award of by the NDMC.

AND

IN THE MATTER OF:

Elephant Energy Private Limited
A-1/136, Third Floor,
Safdarjung Enclave,
New Delhi-110029
India

AND

New Delhi Municipal Council
Palika Kendra
Parliament Street, New Delhi-110001

MOST RESPECTFULLY SHOWETH:

1. By this petition, the Petitioner is seeking the determination of a feed in tariff and generic tariff by the Hon'ble Commission for sale of power from Municipal Solid Waste to Electricity and for directions to the Respondents to purchase such electricity generated at the promotional tariff in fulfillment of the Renewable Purchase Obligation as envisaged under Section 86 (1) (e) read with other applicable provisions of the Electricity Act, 2003.

2. The Petitioner is a Generating Company as defined under Section 2 (28) of the Electricity Act, 2003. The Petitioner is engaged in the business of municipal solid waste management and operating a generating plant for treatment of Municipal Solid Waste and generation of renewable power there from, a Non-Conventional/Renewable Energy Project falling under Section 86(1) (e) of the Electricity Act, 2003 and recognised under the Central Electricity Regulatory Commission (Terms and Conditions for Tariff Determination from Renewable Energy Sources) Regulations, 2012 notified by the Central Commission and the Delhi Electricity Regulatory Commission (Renewable Purchase Obligation and Renewable Energy Certificate Framework Implementation) Regulations, 2011 notified by the Hon'ble Commission. The Petitioner would crave leave to refer to the said Regulations at the time of the hearing. The Petitioner has set-up a 70 MT per day Municipal Solid Waste to power (1.7 MW) project by installing plant and equipment having installed capacity capable of exporting minimum 1.4 MW of power, situated at Raj Nagar, New Delhi, based on Municipal Solid Waste (herein after referred to as this Project) is able to operate as a decentralized model, enabling further environmental and costs savings from the reduced transport requirements of the Municipal Solid Waste.

3. The Project had been developed by the petitioner in the capital city of the country at a time when there has been a trail of unsuccessful/ failed waste to energy projects in the country viz, Okhla Project and Shimla Project.

4. Indian Municipal Solid Waste can be tackled with appropriate selection of technology and careful planning and execution. The NDMC will save significant money from reduced waste disposal, reduced transportation costs and reduced electricity network charges. Society is gaining enormous benefits on account of the following:

   Environment Benefits of the project:

   - Reducing greenhouse gas emissions
     - Avoids a nominal one ton of CO2 equivalent for each ton of waste processed
   - Provides sustainable waste disposal practices as part of an integrated waste management system
     - Global community recognizes Waste to energy (WtE) as a preferred disposal alternative to landfills
   - WtE compliments recycling and recovers metals and energy from residual waste
   - Reduces volume of waste by 90%
   - Reduces long haul trucking of waste to distant landfills
   - Doesn't shift the waste burden to distant communities or future generations

   Social Benefits of the project:

   - Reduced toxicity in the system
   - Less land requirement compare to any other waste management technology.

- No odour problem associated as storage and processing is in an enclosed environment.
- Prevent the ground water contamination problem associated with other technologies.
- Reuse of the residue. Ash can be used for Road pavement/Brick manufacturing or as Daily cover to Landfill.
- Enable waste destruction near source.

Economic Benefits of the project:

- Employment of approximately 60 people in the local economy
- WtE offers predictable waste disposal cost
- Exporting to distant landfills exposes communities to price uncertainty
- Local solutions for local waste management challenges
- Green jobs to construct, operate and maintain
- High paid permanent jobs for local workforce
- Employment of scavenger / waste pickers
- Goods and Services purchased locally
- Competitively priced as compared to other renewable energy source.

5. In May/ June 2014, the NDMC ran a global Request for Tender (RFT) to develop 3 x mini waste-to-energy projects in the NDMC region, with each project to process 70 tonnes of waste per day (combined total of 210 tonnes per day). Each plant is to produce a minimum of 1.4 MWh.

   On July 17th 2014, Elephant Energy Private Limited (Elephant Energy) was declared the winner of the three projects and was issued with a Letter of Award to start work as soon as possible on the first project - to be located at the Arjun Das Camp Waste Transfer Station, Raj Nagar, New Delhi.

   Elephant Energy is the Concessionaire and the project shall be completed on a Build Own Operate Basis (BOO Basis) whereby Elephant Energy is responsible for all aspects of funding the project. There have been no subsidies provided by any Government Department for the project's development. The Project is to be developed in three stages at three separate site locations.

   Elephant Energy accepted the project on July 2014.

   The site of the first project was identified and approved by the NDMC project department. De-markation of the site was conducted on 27 March 2015 and the land was handed over to Elephant Energy at this time.

   Commissioning of this Plant was completed on June 15th 2015 and is currently awaiting execution of the PPA, which is, as per the tender document, was due upon completion of the commissioning phase.

   Only upon completion of the PPA will the project be connected to the Grid. In the absence of a tipping fee, only when the plant is connected to the grid will Elephant Energy be able to earn income from the project.

6. The Plant utilizes gasification techniques that can destruct any carbon based waste streams and recover the energy contained within this waste. The harvested energy is then converted to electricity and sold into the electricity grid.

The emissions have been tested against strict EPA standard and technology has been rated environmentally sound with emissions comfortably exceeding these strict international standards. The emissions of the Plant predominately consist of water vapor and carbon dioxide, whilst the residual solid by-product of the process is non-toxic which can be safely disposed of in landfills or utilized in construction (e.g. as a road base, bricks or used as a concrete aggregate).

7. The total Capital Cost of a Plant is currently US$6.3million. This includes all equipment, freight, customs charges, **import duties and taxes**, buildings, civil works, miscellaneous local content and commissioning costs. Once the PPA is approved a duties/ tax rebate of approximately US$1.05 million will become available, reducing the Capital cost to approximately US$5.25 million.

   The plant shall have a minimum net electrical output of 1.7 MW per hour.

   A plant has total annual operational expenditure of circa US$700,000. This is inclusive of all business overheads, labour, repairs and maintenance costs.

   In addition to the above there are approximately US$50,000 per annum of local gas consumption charges (PNG, Nitrogen and Oxygen).

   The above costs are free of any debt servicing costs as these are project specific. The above costs are also free of any depreciation and other tax related expenses.

8. The petitioner is in a position to treat significant amount of Municipal Waste and produce power there from. The Petitioner is in a position to establish more Projects in the National Capital Territory of Delhi and to treat further quantum of Urban/Municipal Waste and generate power. The Waste to Electricity Projects are of significant importance and are, in fact, a much more significant Non-Conventional Energy as compared to Solar Power Generation or Wind Power Generation. In the case of Solar Projects or Wind Power Projects there is only a conversion of solar power or wind power without any treatment of waste etc. In the case of Waste to Power Project, it is environmentally friendly and will provide much needed treatment of Municipal Waste, which itself is an important social objective. Additionally power is generated.

   The Project Activity will make a substantial contribution to the sustainable development in the environment sector by providing long term solution to the increasing problem of processing municipal solid waste in most eco-friendly manner. The Project is being set up at a dumping site of the Municipality thereby utilizing the dumping site in the most efficient and environmentally friendly manner. The Project Activity reduces emissions of methane, a powerful contributor to climate change and any eliminates any leachate that would have been generated from landfills. Such Project Activity directly results into more cleaner and healthy environment thereby reducing the possible health hazards that would emerge from mere dumping of waste and thus lead to improved public health.

9. Moreover, the Project Activity will generate renewable electricity that will displace fossil-fuel based generation and assist in supplying the State's pressing and growing electricity demand.

10. The problems of unmanaged waste disposal in India are chronic. In many cities including Delhi, nearly 50% of waste remains unattended, resulting in unhygienic conditions and potential disease. The solution deals with unmanaged MSW and transforms a social liability into an economic opportunity.

11. It is necessary to encourage the developer with a tariff that is not only cost reflective but also provides sufficient additional incentives to induce necessary investment. This is also necessary to enable the lenders and other investors to support the project. The technology required for such project is also new and needs to be procured and used at significant cost. The project clearly comes into the provisions of Section 61(1)(h) read with Section 86(1))e) of the Act and is also a part of the declared policies of the Central Government and State Governments and the Central Electricity Regulatory

Commission and State Electricity Regulatory Commissions. Other Renewable Energy Technologies by the State Commission like wind, solar thermal, solar power, etc which have a higher impact on the cost of purchase to the final consumer are being given promotional tariffs. This Renewable Energy Technology is not only relatively cost effective but is also simultaneously solves the burgeoning problem of increasing Municipal Solid Waste. The NDMC had forsight in regards to these benefits and proposed a tariff of Rs. 8.00 per KW to be applied to this project, increasing with inflation.

12. In terms of the recent CERC draft tariff determination, rates for waste to energy processes have been determined at Rs.7.90 KW.

13. The Electricity Act, 2003 envisages promotion of generation of Electricity from Non-Conventional Sources. Section 3 of the Electricity Act, 2003 provides that the Central Government shall, from time to time, prepare the national electricity policy and tariff policy, in consultation with the State Governments and the Central Electricity Authority for development of the power system based on optimal utilisation of resources such as coal, natural gas, nuclear substances or materials, hydro and renewable sources of energy. Section 4 of the Electricity Act, 2003 further provides that the Central Government shall, after consultation with the State Governments, prepare and notify a national policy, permitting stand alone systems (including those based on renewable sources of energy and non-conventional sources of energy) for rural areas.

14. Further Section 61(h) and Section86(1)(e) of the Electricity Act, 2003 enjoin the Central Electricity Regulatory Commission and State Electricity Regulatory Commissions respectively to promote cogeneration and generation of electricity from renewable sources of energy by providing suitable measures for connectivity with the grid and sale of electricity to any person, and also specify, for purchase of electricity from such sources, a percentage of the total consumption of electricity in the area of a distribution license.

15. Section 86(4) of the Electricity Act 2003 provides that State Commission in discharge of its functions shall be guided by National Electricity Policy, National Electricity Plan and National Tariff Policy published under section 3. the National Electricity Policy as well as the Tariff Policy framed under Section 3 of the Electricity Act, 2003 provide for procurement of renewable power at preferential tariff. The relevant portions of both the National Electricity Policy as well as the Tariff Policy are being reproduced herein below for a ready reference of this Hon'ble Court:

"National Electricity Policy framed under Section 3 of the Electricity Act, 2003

"5.2.20 Feasible potential of non - conventional energy resource's, mainly small hydro, wind and bio-mass would also need to be exploited fully to create additional power generation capacity. With a view to increase the overall share of non - conventional energy sources in the electricity mix, efforts will be made to encourage private sector participation through suitable promotional measures."

"5.12 COGENERATION AND NON - CONVENTIONAL ENERGY SOURCES

5.12.1 Non - conventional sources of energy being the most environment friendly there is an urgent need to promote generation of electricity based on such sources of energy. For this purpose, efforts need to be made to reduce the capital cost of projects based on non - conventional and renewable sources of energy. Cost of energy can also be reduced by promoting competition within such projects. At the same time, adequate promotional measures would alsohave to be taken for development of technologies and a sustained growth of these sources.

5.12.2 The Electricity Act 2003 provides that co-generation and generation of electricity from non-conventional sources would be promoted by the SERCs by providing suitable measures for connectivity with grid and sale of electricity to any person and also by

specifying. For purchase of electricity from such sources, a percentage of the total consumption of electricity in the area of a distribution licensee. Such percentage for purchase of power from non - conventional sources should be made applicable for the tariffs to be determined by the SERCs at the earliest. Progressively the share of electricity from non- conventional sources would need to be increased as prescribed by State Electricity Regulatory Commissions. Such purchase by distribution companies shall be through competitive bidding process. Considering the fact that it will take some time before non - conventional technologies compete, in terms of cost, with conventional sources, the Commission may determine an appropriate differential in prices to promote these technologies.

5.12.3 Industries in which both process heat and electricity are needed are well suited for cogeneration of electricity. A significant potential for cogeneration exists in the country, particularly in the sugar industry. SERCs may promote arrangements between the co -generator and the concerned distribution licensee for purchase of surplus power from such plants. Cogeneration system also needs to be encouraged in the overall interest of energy efficiency and also grid stability."

16. National Tariff Policy issued by the Central Government in terms of Section 3 of the Electricity Act, 2003:

" 6.4 Non-conventional sources of energy generation including Co-generation:

(1) Pursuant to provisions of section 86(1)(e) of the Act, the Appropriate Commission shall fix a minimum percentage for purchase of energy from such sources taking into account availability of such resources in the region and its impact on retail tariffs. Such percentage for purchase of energy should be made applicable for the tariffs to be determined by the SERCs latest by April 1, 2006.

It will take some time before non-conventional technologies can compete with conventional sources in terms of cost of electricity. Therefore, procurement by distribution companies shall be done at preferential tariffs determined by the Appropriate Commission,

(2) Such procurement by Distribution Licensees for future requirements shall be done, as far as possible, through competitive bidding process under Section 63 of the Act within suppliers offering energy from same type of nonconventional sources. In the long-term, these technologies would need to compete with other sources in terms of full costs.

(3) The Central Commission should lay down guidelines within three months for pricing non-firm power, especially from non-conventional sources, to be followed in cases where such procurement is not through competitive bidding.

Ministry of Power has amended the National Tariff Policy on 20 January, 2011, the relevant part of the said amendment is reproduced below:

6.4 Non-conventional and Renewable sources of energy generation including Co-generation:-

(1) Pursuant to provisions of section 86(1)(e) of the Act, the Appropriate Commission shall fix a minimum percentage of the total consumption of electricity in the area of distribution licensee for purchase of energy from such sources, taking into account availability of such resources in the region and its impact on retail tariffs.

Such percentage for purchase of energy should be made applicable for the tariffs to be determined by the SERCs latest by April 1, 2006.

(i) Within the percentage so made applicable, to start with, the SERCs shall also reserve a minimum percentage for purchase of solar energy from the date of notification in the official gazette which will go up to 0.25% by the end of 2012-13 and further up to 3% by 2022.

(ii) It is desirable that the purchase of energy from nonconventional sources of energy takes place more or less in the same proportion in different states. To achieve this objective in the current scenario of large availability of such resources only in certain parts of the country, and appropriate mechanism such as renewable energy certificates (REC) would need to be evolved. Through such a mechanism, the renewable energy based generation companies can sell the electricity to local distribution licensees at the rates for conventional power and can recover- the balance cost by selling such certificates to other distribution companies and obligated entities enabling later to meet their renewable power purchase obligation. In view of the comparatively higher cost of the electricity from solar energy currently, the REC mechanism should also have a solar specific REC.

(iii) It will take some time before non – conventional technologies can compete with conventional sources in terms of cost of electricity. Therefore, procurement 4 distribution companies shall be done at preferential tariff determined by the Appropriate Commission."

17. The National Electricity Policy and the National Tariff Policy as quoted above provide for two modes for determination of tariff in case of procurement of renewable energy - (i) at a preferential tariff as determined by the Appropriate Commission under Section 62 or (ii) at a tariff adopted by the Appropriate Commission under Section 63 when such tariff has been determined through a transparent process of competitive bidding as per the guidelines framed by the Central Government.

18. The Petitioner submits that the Respondent has committed to purchase power from the Petitioner from August 2015 at Rs. 8.00 KW. The Respondent is required to fulfill the Renewable Purchase Obligation specified by the Hon'ble Commission by agreeing to pay the promotional tariff to be determined by the Hon'ble Commission. If Respondent is desirous of treating such power as purchase towards Renewable Purchase Obligation, Respondent No. 1 should be directed to pay appropriate tariff as determined by the Hon'ble Commission.

19. In the circumstances mentioned above, the Petitioner submits that the following are required to be undertaken in the matter relating to promotion of Non - Conventional Energy of Waste to Power Projects:

(a) the Hon'ble Commission may initiate a proceeding for determination of tariff for Waste to Energy Projects consistent with the provisions of Section 86 (1) (e) and Section 61 (h) of the Electricity Act, 2003 and also the aforementioned Regulations of the Central Commission and the Hori'ble Commission and determine the tariff applicable as promotional tariff for the Project Developers to sell electricity to the Distribution Licensees;

(b) direct Respondent to fulfil the Letter of Award for the waste to energy tender by the purchase of electricity generated from Waste to Power Projects such as the one established by the Petitioner;

20. The Elephant Energy operations are consistent with a recent push by the Indian Government to make dramatic changes to the cleanliness of India. The Indian Prime Minister late in 2014 gave a call for 'Swachh Bharat Abhiyan' (Clean India Mission) as a mass movement to realise Mahatma Gandhi's dream of a clean India by 2019, when the country will celebrate 150th birth anniversary of the 'Father of the Nation'.

Swachh Bharat calls for investment, behavioural changes, expertise and scientific knowledge. Swachh Bharat primarily looks at sanitation and solid waste. Waste management is therefore one of the most pressing of issues.

21. It is, therefore, respectfully prayed that this Hon'ble Commission may be pleased:

I. to initiate a proceeding for determination of tariff for Waste to Energy Projects consistent with the provisions of Section 86 (1) (e) and Section 61 (h) of the Electricity Act, 2003; and

II. to determine or adopt a generic tariff applicable for future MSW waste to energy gasification projects.

Place: NEW DELHI

Date: 30/11/2015

CEO

Signature & Designation

Before The Delhi Electricity Regulatory Commission

Petition NO.:

IN THE MATTER OF:

Elephant Energy Private Limited (Petitioner) V/s

New Delhi Municiapal Council (Respondent(s))

Memo of Appearance

I, James Maurice Newman working as Chief Executive Officer, having been authorised by Elephant Energy Private Limited, hereby enter appearance on behalf of Elephant Energy Private Limited and undertake to plead and act for it in all matters in the aforesaid case.

Place: NEW DELHI

Date: 30/11/2015

CEO

Signature & Designation

Address for correspondence:

A-1/136
3rd Floor
Safdarjung Enclave
New Delhi 110029

Annex A

INDIA NON JUDICIAL

Government of National Capital Territory of Delhi

e-Stamp

सत्यमेव जयते

Certificate No.	:	IN-DL87063924725240N
Certificate Issued Date	:	28-Nov-2015 04:21 PM
Account Reference	:	IMPACC (IV)/ dl708203/ DELHI/ DL-DLH
Unique Doc. Reference	:	SUBIN-DLDL70820372164144233021N
Purchased by	:	ELEPHANT ENERGY PRIVATE LIMITED
Description of Document	:	Article 4 Affidavit
Property Description	:	Not Applicable
Consideration Price (Rs.)	:	0 (Zero)
First Party	:	ELEPHANT ENERGY PRIVATE LIMITED
Second Party	:	Not Applicable
Stamp Duty Paid By	:	ELEPHANT ENERGY PRIVATE LIMITED
Stamp Duty Amount(Rs.)	:	10 (Ten only)

SH/28/11/2015

Please write or type below this line

NOTARY SH/28/11/2015 GOVT. OF INDIA

Before The Delhi Electricity Regulatory Commission

New Delhi

FILING NO.:

CASE NO.:

(To be filled by the Office)

IN THE MATTER OF:

Section 86 (1) (e) read with Sections 61, 62, 64 and other applicable provisions of the Electricity Act, 2003.

AND

IN THE MATTER OF:

The Petitioner is seeking the determination of a feed in tariff by the Hon'ble Commission for sale of power from Municipal Solid Waste to the New Delhi Municipal Council as per the notice of award of by the NDMC.

AND

IN THE MATTER OF:

Elephant Energy Private Limited
A-1/136, Third Floor,
Safdarjung Enclave,
New Delhi-110029
India

AND

New Delhi Municipal Council
Palika Kendra
Parliament Street, New Delhi-110001

AFFIDAVIT

I, Mr James Maurice Newman son of Mr Maurice Lionel Newman, aged 46 residing at 7, Taunton Street Pymble New South Wales Australia do solemnly affirm and say as follows:

1. I am a Director of Elephant Energy private Limited the petitioner in the above matter and am duly authorised by the said petitioner to make this affidavit.

2. I state the accompanying Petition has been drafted under my instructions and the contents of the same are true to my knowledge derived from records kept by petitioner company. I state that I have not supressed any material facts.

3. The annexure to the instant petition are true copies of the respective originals

Verification

I Solemnly affirm at Delhi on this day of Saturday, 28 Novemebr 2015 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.

Witness:

Deponent:

JAMES MAURICE NEWMAN

NOTARY SH/29/11/2015 DELHI

ATTESTED

BHIM SINGH INDORA
NOTARY GOVT OF INDIA

28 NOV 2015

Dinesh Kumar
IDENTIFY THE DEPONENT/EXECUTANT
WHO HAS SIGNED IN MY PRESENCE
A-136 3rd Floor Safdarjung Enclave
New Delhi -1100 29

Annex B

OFFICE OF THE DIRECTOR (PROJECT)
NEW DELHI MUNICIPAL COUNCIL
PALIKA KENDRA : NEW DELHI

No.D/ 688 /Dir(Projects)/2014 Dated:- 17/7/14.

Sh. Andrew Skidmore,
Group Founder & CEO
G20 Environmental Solutions Group,
Sydney, NWS, Australia,

SUB: Mini Waste to Energy Plant in NDMC area.

Sir,

Kindly refer to your offer dated 27.6.2014 for setting up of Mini Waste to Energy Plant in NDMC area. In principal approval for three plants as envisaged in your offer, has been approved. The site for the first plant is ready and we would request you to start construction at this site immediately.

Yours faithfully,

(O.P. Mishra)
Director (Project)

Annex C

NAGAR GOEL & CHAWLA

Chartered Accountants

To,

Delhi Electricity Regulatory Commission

ViniyamakBhavan, C - Block,
Maharishi Dayanand Marg,
Jahanpanah Monument, Malviya Nagar,
New Delhi, Delhi 110016

Subject: Certification of capital cost to be incurred by Elephant Energy Private Limited for their Municipal Solid Waste (MSW) located atNDMC Khtta, Arjun Das Camp, Raj Nagar, New Delhi - 110023

We have examined the purchase agreement in between supplier of the equipment and Elephant Energy Private Limited, D-605, Satisar, Plot - 6, Sector - 7, Dwarka, Delhi - 110075 ("the Company") (vide Contract reference : EEPL(India)_00001Rev1.0)

On the basis of agreement, we hereby certify that the Capital cost to be incurred by the Company would be as under:

S.No.	Component of Capital Cost	Amount in USD
1	Energy Generation Plant	1,113,000
2	Gasifier	1,735,000
3	RDF Plant	433,125
4	Building, office and workshop	341,500
5	Freight	79,850
6	Duties and taxes	999,668
7	Custom clearing charges	30,000
8	Local Content	158,000
9	Engineering, Integration and Commission	1,338,988
	Total	**6,229,131**

Above figures are based on extracts of the aforesaid contract.

This certificate has been issued on request of management of the Company to be submitted to Delhi Electricity Regulatory Commission and not meant for general circulation.

For Nagar Goel & Chawla
Chartered Accountants
Firm Regn. No. - 009933N

NAGAR GOEL & CHAWLA New Delhi Chartered Accountants

Raman Chawla
Partner
M. No. 088805

Place: New Delhi
Date: 12.09.2015

C-23,Usha Niketan, Safdarjung Development Area, New Delhi - 110016, India
Tel : 011 - 41435260-61 Fax : 011 - 41435262
E-mail : ngcca@ngcca.com, web . www.ngcca.com