



Verified Carbon Standard

Bundled Solar Power Project by Mahindra Susten Private Limited



Document Prepared by EKI Energy Services Limited

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1 PROJECT DETAILS

1.1 Summary Description of the Implementation Status of the Project

The main purpose of this project activity is to generate clean form of electricity through renewable solar energy source. The project is a bundled project activity which involves installation of 205 MW solar project in different states of India through SPVs.

Over the 10 years of first crediting period, the project will replace anthropogenic emissions of greenhouse gases (GHG's) estimated to be approximately 329,360 tCO_{2e} per year, thereon displacing 341,202 MWh/year amount of electricity from the generation-mix of power plants connected to the Indian grid, which is mainly dominated by thermal/fossil fuel based power plant.

The details of the SPVs for the project and their location of installation are mentioned in the table below:-

Name of SPVs	Capacity in MW		COD	Connection with Grid	State	Usage
	AC	DC				
Cleansolar Renewable Energy Private Limited	30 MW	36.6 MW	29/06/2016	Indian Grid	Telangana	Sale to State Discom
Divine Solren Private Limited	50 MW	59.8 MW	22/07/2017	Indian Grid	Telangana	Sale to State Discom
Astra Solren Private Limited	40 MW	52 MW	31/03/2017	Indian Grid	Gujarat	Sale to State Discom
	25 MW	32.49 MW	23/05/2017	Indian Grid	Gujarat	Sale to State Discom
Mahindra Susten Private Limited	60 MW	78.01 MW	31/03/2017	Indian Grid	Rajasthan	Sale to State Discom

These are the SPVs of Mahindra Susten Private Limited and the project is promoted by Mahindra Susten Private Limited.

Total emission reductions achieved in this monitoring period:

During the Current Monitoring Period from 24/05/2018 to 23/12/2019 (First and last date included) the project activity has supplied 633629.62 MWh of electricity, and thus contributing to the GHG reductions 611,586 tCO_{2e}.

1.2 Sectoral Scope and Project Type

The project activity falls under the following Sectoral scope and Project Type:

Sectoral Scope: 01 - Energy industries (renewable / non-renewable sources)

Project Type: I - Renewable Energy Projects

Methodology: ACM0002: Grid-connected electricity generation from renewable sources- Version 18.0¹

The project is not a grouped project activity.

1.3 Project Proponent

Organization name	Mahindra Susten Private Limited
Contact person	-
Title	-
Address	6th Floor AFL House, Lok Bharati Complex, Marol Maroshi Road, Mumbai, Maharashtra- 400059
Telephone	-
Email	-

1.4 Other Entities Involved in the Project

Organization name	EKI Energy Services Limited
Role in the Project	Project Consultancy
Contact person	Mr. Kingshuk Das
Title	Project manager
Address	Office No 201, Plot No 48, Scheme 78, Part 2, Vijay Nagar, Indore-452010, Madhya Pradesh, India
Telephone	+91-9589899649
Email	kingshuk@enikingint.org

1.5 Project Start Date

Project Start Date: 29-June-2016. This is the date of commissioning of 30 MW solar PV project activity by Cleansolar Renewable Energy Private Limited (CREPL).

1.6 Project Crediting Period

Crediting Period Start date: 29-June-2016

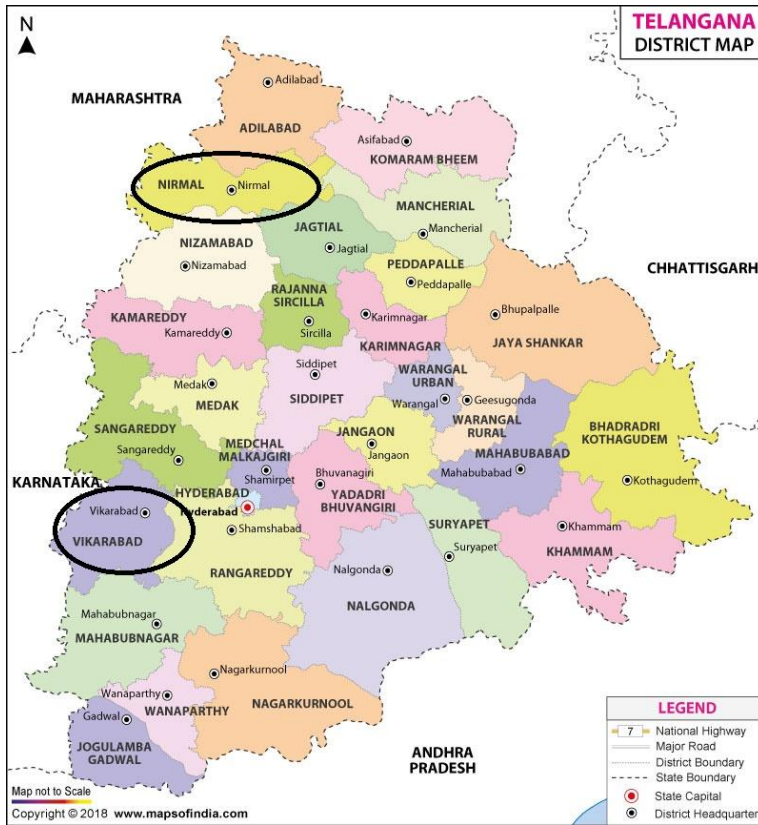
Crediting Period End date: 28-June-2026

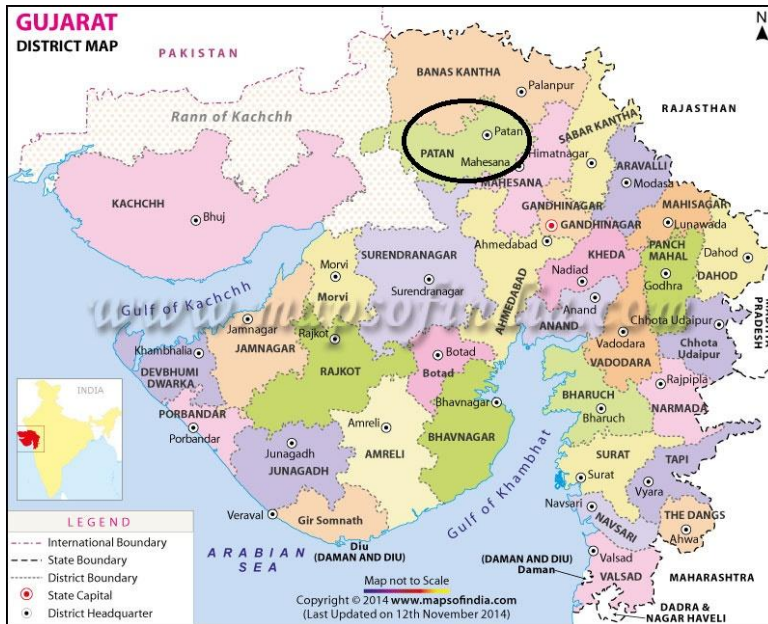
The project activity adopts renewable crediting period of 10 years period which can be renewed for maximum 2 times.

¹<http://cdm.unfccc.int/methodologies/DB/5725LCHYPYM4I1V8OD9SFYVAMFFWNP>

1.7 Project Location

The project location has been highlighted in the geographical map shown below





The Geo Coordinates of the project location has been mentioned in the table below:

Name of SPVs	Village / Site	Tehsil / Mandal	District	State	Latitude (N)	Longitude (E)
Cleansolar Renewable Energy Private Limited	Gingurthi	Tandur	Vikarabad	Telangana	17° 21' 36.0"	77° 31' 48.0"
Divine Solren Private Limited	Mallapur, Mujgi	Nirmal, Dilawarpur	Nirmal	Telangana	19° 02' 24.0"	78° 16' 48.0"
Astra Solren Private Limited	Charanka	Santalpur	Patan	Gujarat	23° 54' 00.0"	71° 12' 00.0"
	Charanka	Santalpur	Patan	Gujarat	23° 54' 00.0"	71° 12' 00.0"
Mahindra Susten Private Limited	Goyalri / Gajner	Kolayat	Bikaner	Rajasthan	27° 54' 00.0"	73° 00' 00.0"

1.8 Title and Reference of Methodology

Methodology: ACM0002: Grid-connected electricity generation from renewable sources - Version 18.0²

Sectoral Scope: 01

Type I: Energy industries (renewable / non-renewable sources)

Category: Approved Consolidated Methodology (ACM0002)

Tools referred with above methodology and applicable for project activity are:

- Tool to calculate the emission factor for an electricity system³- Version 06.0 (EB 97, Annex 07)

²<http://cdm.unfccc.int/methodologies/DB/5725LCHYPYM411V8OD9SFYVAMFFWNP>

- Methodological Tool- Tool for the demonstration and assessment of additionality⁴- Version 07.0.0 (EB 70, Annex 08)

1.9 Participation under other GHG Programs

The project has neither been registered nor seeking registration under any other GHG programs. The project is seeking registration only in VCS program.

1.10 Other Forms of Credit

Emission Trading Programs and Other Binding Limits:

Net GHG emission reductions or removals generated by the Project will not be used for compliance with an emissions trading program or to meet binding limits on GHG emissions in any Emission Trading program or other binding limits.

Other Forms of Environmental Credit:

Not applicable, as the project is not registered in any other GHG mechanism other than VCS. Also, the project activity is not availing any REC benefits and the same can be confirmed from publically available link of REC generators.

Web-link:https://www.recregistryindia.nic.in/index.php/general/publics/registered_regens

1.11 Sustainable Development

Contribution to sustainable development:

Ministry of Environment and Forests, has stipulated economic, social, environment and technological well-being as the four indicators of sustainable development. The project contributes to sustainable development using the following ways.

Social well-being: The project would help in generating employment opportunities during the construction and operation phases. The project activity will lead to development in infrastructure in the region like development of roads and also may promote business with improved power generation.

Economic well-being: The project is a clean technology investment in the region, which would not have been taken place in the absence of the VCS benefits the project activity will also help to reduce the demand supply gap in the state.

Technological well-being: The successful operation of project activity would lead to promotion of solar based power generation and would encourage other entrepreneurs to participate in similar projects.

³<http://cdm.unfccc.int/methodologies/PAMethodologies/tools/am-tool-07-v6.pdf>

⁴<http://cdm.unfccc.int/methodologies/PAMethodologies/tools/am-tool-01-v7.0.0.pdf>

Environmental well-being: Solar being a renewable source of energy, it reduces the dependence on fossil fuels and conserves natural resources which are on the verge of depletion. Due to its zero emission the Project activity also helps in avoiding significant amount of GHG emissions and specific pollutants like SO_x, NO_x, and SPM associated with the conventional thermal power generation facilities.

2 SAFEGUARDS

2.1 No Net Harm

The project activity does not involve any major construction activity. It primarily requires the installation of the solar PV panels, interfacing the generators with the State Electricity Board by setting up HT transmission lines and installation of other accessories.

The report on “Developmental Impacts and Sustainable Governance Aspects of Renewable Energy Projects” prepared by MNRE dated September 2013. This report clearly mentioned that solar PV project activity operations do not result in direct air pollution, noise pollution. Please refer below web link for the same⁵.

Thus there are no any significant impacts due to implementation of project activity on air, water, soil quality and ambience are envisaged due to the project activity.

2.2 Local Stakeholder Consultation

The local stakeholder meeting was carried out for the project activity and the details of the same can be referred from the registered VCS PD.

As a part of continuous feedback from stakeholders, the PP also placed a grievance register onsite where-in, the stakeholders can put down their complaint and the same if found genuine are addressed immediately.

Some of the inputs about the project/grievances and their resolution dates are shown below:

Sl. No	Date of Complaint	Site	Topic	Date of Resolution	Remark from PP
1	10-05-2018	Telangana	Contribution required for organizing sports tournament	18-05-2018	Contribution was given for the sports tournament
2	04-08-2019	Telangana	Contribution required for organizing Independence Day celebration at Primary	10-08-2019	Contribution was given to primary school.

⁵ <http://mnre.gov.in/file-manager/UserFiles/report-on-developmental-impacts-of-RE.pdf>

			school		
3	20-10-2019	Gujarat	Repair the Road near the primary school	28-10-2019	The road was repaired
4	25-05-2019	Rajasthan	Contribution required for functioning of primary school library	08-06-2019	Contribution was given for the library

2.3 AFOLU-Specific Safeguards

Not Applicable, as this is not an AFOLU project.

3 IMPLEMENTATION STATUS

3.1 Implementation Status of the Project Activity

The project activity involves the installation of Solar PV project. The total installed capacity of the project is 205 MW of Solar PV plant located at different states in India. The project is promoted by Mahindra Susten Private Limited.

The Project activity is a new facility (Greenfield) and the electricity generated by the project will be exported to the Indian electricity grid. The project will therefore displace an equivalent amount of electricity which would have otherwise been generated by fossil fuel dominant electricity grid. The Project Proponent plans to avail the VCS benefits for the project.

In the Pre- project scenario the entire electricity, delivered to the grid by the project activity, would have otherwise been generated by the operation of grid-connected power plants and by the addition of new generation sources.

Solar PV Project Technology Details –

The project activity aims to harness solar energy through installation of Solar PV project with total installed capacity of 205 MW.

The technical specification of 30 MW plant interconnection with grid on 29-06-2016 by Cleansolar Renewable Energy Private Limited are as follows:

Sl. No.	Technical details of the equipment	Description
1	Technology Used	Multi-crystalline and Thin Film
2	Make of modules installed	Trina Solar and Solar Frontier
3	Model of the modules installed	Trina Solar TSM-310PC14; Solar Frontier SF170-S
4	Make & Model of Invertor	SMA - Sunny Central 2200
5	Number of Inverters	14

6	Make & Number of Transformers	Power transformer- 1, make-CGL ; Inverter duty transformers-14, make-Danish
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The technical specification of 50 MW plant interconnection with grid on 22-07-2016 by Divine Solren Private Limited are as follows:

Sl. No.	Technical details of the equipment	Description
1	Technology Used	Multi-crystalline
2	Make of modules installed	Hanwha Solar
3	Model of the modules installed	Hanwa Solar HSL 72 P6-PC-1-315/320
4	Make & Model of Invertor	SMA - Sunny Central 1000CP-XT
5	Number of Inverters	46
6	Make & Number of Transformers	Power transformer- 2, make-CGL ; Inverter duty transformers-12, make-Danish

The technical specification of 40 MW plant interconnection with grid on 31-03-2017 by Astra Solren Private Limited are as follows:

Sl. No.	Technical details of the equipment	Description
1	Technology Used	Multi-crystalline and Thin Film
2	Make of modules installed	Canadian Solar and First Solar
3	Model of the modules installed	Canadian Solar 320 P Mix, First Solar FS 4117A-3
4	Make & Model of Invertor	SMA - Sunny Central 1000CP-XT, GE Power - LV5 1000kW
5	Number of Inverters	40
6	Make & Number of Transformers	Power transformer- 2, make-CGL ; Inverter duty transformers-11, make-Danish

The technical specification of 25 MW plant interconnection with grid on 23-05-2017 by Astra Solren Private Limited are as follows:

Sl. No.	Technical details of the equipment	Description
1	Technology Used	Multi-crystalline
2	Make of modules installed	Hanwha Solar
3	Model of the modules installed	Hanwa Solar HSL 72 P6-PC-1-320
4	Make & Model of Invertor	SMA - Sunny Central 1000CP-XT
5	Number of Inverters	25
6	Make & Number of Transformers	Power transformer- 1, make-CGL ; Inverter duty transformers-7, make-Danish

The technical specification of 60 MW plant interconnection with grid on 31-03-2017 by Mahindra Susten Private Limited are as follows:

Sl. No.	Technical details of the equipment	Description
1	Technology Used	Multi-crystalline and Thin Film
2	Make of modules installed	Canadian Solar and First Solar
3	Model of the modules installed	Canadian Solar 320 P Mix, First Solar FS 4117A-3
4	Make & Model of Invertor	SMA - Sunny Central 1000CP-XT, GE Power - LV5 1000kW
5	Number of Inverters	60
6	Make & Number of Transformers	Power transformer- 1, make-BharatBijlee ; Inverter duty transformers-18, make-Danish

During the Current Monitoring Period, all the solar plants were operational and the project activity has supplied 633,629.62 MWh of electricity, and thus contributing to 611,586 tCO₂e GHG reductions.

3.2 Deviations

2.3.1 Methodology Deviations

Not Applicable, as there are no methodological deviations.

2.3.2 Project Description Deviations

Not Applicable, as there are no project deviations.

3.3 Grouped Projects

Not Applicable, as this is not a grouped project activity.

4 DATA AND PARAMETERS

4.1 Data and Parameters Available at Validation

Data / Parameter	EF_{grid,OM,y}
Data unit	tCO ₂ /MWh
Description	Operating Margin CO ₂ emission factor in year y
Source of data	Calculated from CEA database, Version 12, May 2017 ⁶

⁶http://www.cea.nic.in/reports/others/thermal/tpece/cdm_co2/user_guide_ver12.pdf

Value applied	0.9843
Justification of choice of data or description of measurement methods and procedures applied	Calculated as per “Tool to calculate the emission factor for an electricity system, version 05” as 3-year generation weighted average using data for the years 2013-14, 2014-15 & 2015-16. The data are obtained from “CO ₂ Baseline Database for Indian Power Sector” version 12, published by the Central Electricity Authority, Ministry of Power, Government of India.
Purpose of Data	For the calculation of the baseline emission
Comments	This parameter is fixed ex-ante for the entire crediting period.

Data / Parameter	EF_{grid,BM,y}
Data unit	tCO ₂ /MWh
Description	Build Margin CO ₂ emission factor in year y
Source of data	Calculated from CEA database, Version 12, May 2017 ⁷
Value applied	0.9083
Justification of choice of data or description of measurement methods and procedures applied	Calculated as per “Tool to calculate the emission factor for an electricity system, version 05” as per the latest data available for the most recent year 2015-16. The data is obtained from “CO ₂ Baseline Database for Indian Power Sector” version 12, published by the Central Electricity Authority, Ministry of Power, Government of India.
Purpose of Data	For the calculation of the Baseline Emission
Comments	This parameter is fixed ex-ante for the entire crediting period.

Data / Parameter	EF_{grid,CM,y}
Data unit	tCO ₂ /MWh
Description	Combined Margin CO ₂ emission factor in year y
Source of data	Calculated from CEA database, Version 12, May 2017 ⁸
Value applied	0.9653
Justification of choice of data or description of measurement methods and procedures applied	<p>The combined margin emissions factor is calculated as follows:</p> $EF_{grid,CM,y} = EF_{grid,OM,y} * W_{OM} + EF_{grid,BM,y} * W_{BM}$ <p>Where:</p> <p>EF_{grid,BM,y}= Build margin CO₂ emission factor in year y (tCO₂/MWh)</p> <p>EF_{grid,OM,y}= Operating margin CO₂ emission factor in year y (tCO₂/MWh)</p> <p>W_{OM} = Weighting of operating margin emissions factor (%) = 75%</p> <p>W_{BM}= Weighting of build margin emissions factor (%) = 25%</p>

⁷http://www.cea.nic.in/reports/others/thermal/tpece/cdm_co2/user_guide_ver12.pdf

⁸http://www.cea.nic.in/reports/others/thermal/tpece/cdm_co2/user_guide_ver12.pdf

Purpose of Data	For the calculation of the Baseline Emission
Comments	This parameter is fixed ex-ante for the entire crediting period

4.2 Data and Parameters Monitored

Data / Parameter	EG_{PI, y}
Data unit	MWh/y
Description	Quantity of net electricity generation supplied by the project plant/unit to the grid in year y in MWh. (This value will be the sum of the net electricity generated from all 3 sites)
Source of data	Monthly joint meter reading reports
Description of measurement methods and procedures to be applied	The difference of final value of export and import is used for monthly values of net electricity supplied to the grid by the project activity and same value will be considered for ER calculations.
Frequency of monitoring/recording	Continuous measurement & monthly recording
Value monitored	633,629.62 MWh
Monitoring equipment	The electricity exported / supplied by the plant to pooling substation and further to substation. This meter also measures electricity imported by the plant from the grid.
QA/QC procedures to be applied	<p>The meters is approved, tested & sealed by the State Utility. The meters are in the custody of State Utility. The frequency of calibration is once in 5 years.⁹ The monthly electricity supplied/exported by the project activity in the JMR report is cross checked with the monthly invoices of sale. In the absence or delay in the meter calibration appropriate Guidelines will be applied appropriately to confirm the conservativeness of metering.</p> <p>The metering arrangement, accuracy class of meters, calibration frequency is under control of state electricity board and PP do not have any control on it. PP is getting value of net electricity supplied to grid and the same is considered the monitoring parameter.</p> <p>The billing is raised based on substation meters.</p>
Purpose of the data	Calculation of baseline emissions
Calculation method	Thus, Net electricity supplied to the grid by the project plant in a given month = Export, kWh – Import, kWh
Comments	Data will be archived in paper & electronic form for two years after the end of crediting period or of the last issuance of VCU

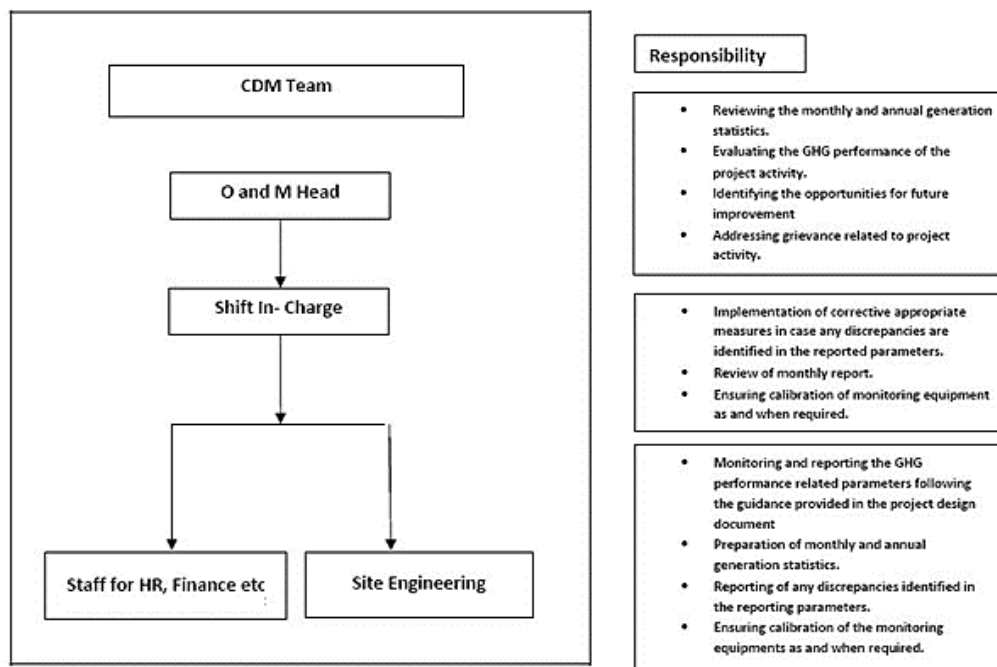
⁹ http://www.aegcl.co.in/Metering_Regulations_Of_CEA_17_03_2006.pdf

for this project activity, whichever occurs later.

4.3 Monitoring Plan

The monitoring plan is developed in accordance with the modalities and procedures for CDM project activities and is proposed for grid-connected solar power project being implemented. The monitoring plan, which will be implemented by the project participant describes about the monitoring organisation, parameters to be monitored, monitoring practices, quality assurance, quality control procedures, data storage and archiving.

The authority and responsibility for registration, monitoring, measurement, reporting and reviewing of the data rests with the project participant. PP proposed the following structure for data monitoring, collection, data archiving and calibration of equipments for this project activity. The team comprises of the following members:



Data Measurement

The export and import energy will be measured continuously using above mentioned Main and Check meters located at the substations. Readings of meters shall be taken on monthly basis by authorized officer of SEB in the presence of PP or representative of PP. Based on the Meter Reading Statement to PP, invoices will be raised. These invoices can be used for cross checking the meter readings taken for the respective project activity.

Data collection and archiving

Readings from meters will be collected in the presence of the plant in-charge. Export and Import data would be recorded and stored in logs as well as in electronic form on a daily basis. The records are

checked periodically by the Plant Manager and discussed thoroughly with the plant supervisor. The period of storage of the monitored data will be 2 years after the end of crediting period or till the last issuance of VERs for the project activity whichever occurs later.

Emergency Preparedness:

The project activity will not result in any unidentified activity that can result in substantial emissions from the project activity. No need for emergency preparedness in data monitoring is visualized.

Personnel training

In order to ensure a proper functioning of the project activity and a properly monitoring of emission reductions, the staff will be trained. The plant helpers will be trained in equipment operation, data recording, reports writing, operation and maintenance and emergency procedures in compliance with the monitoring plan.

5 QUANTIFICATION OF GHG EMISSION REDUCTIONS AND REMOVALS

5.1 Baseline Emissions

$$BE_y = EG_{PJ, y} * EF_{grid, CM, y}$$

Where:

BE_y : Baseline emissions in year y (tCO₂e/yr)

$EG_{PJ, y}$: Quantity of net electricity generation that is produced and fed into the grid as a result of the implementation of the VCS project activity in year y (MWh/yr)

$EF_{grid, CM, y}$: Combined margin CO₂ emission factor for grid connected power generation in year y calculated using the latest version of the “Tool to calculate the emission factor for an electricity system” (tCO₂e/MWh)

Parameter	Unit	Value
$EG_{PJ, y}$	MWh	633,629.62
$EF_{grid, CM, y}$	tCO ₂ /MWh	0.9653
BE_y	=	633,629.62 * 0.9653
	tCO ₂ e	611,586 (Round down value)

5.2 Project Emissions

Not Applicable, since emissions from the project activity is zero as per ACM0002 methodology. Hence, $PE_{FF, y} = 0$.

5.3 Leakage

Not Applicable, since leakage emissions from the project activity is zero as per ACM0002 methodology. Hence, $LE_y = 0$.

5.4 Net GHG Emission Reductions and Removals

Year	Baseline emissions or removals (tCO _{2e})	Project emissions or removals (tCO _{2e})	Leakage emissions (tCO _{2e})	Net GHG emission reductions or removals (tCO _{2e})
2018	219,193	0	0	219,193
2019	392,393	0	0	392,393
Total	611,586	0	0	611,586

It is to be noted here that as per the estimated emission reduction to be achieved from the project activity for the current monitoring period is 522,464 tCO_{2e}, whereas actual emission reductions achieved are 611,586 tCO_{2e}, which is approximately 17% higher than the estimated emission reductions. The generation of electricity depends upon many other climatic conditions, which are not within the control of the project participant. The higher generation during the current verification period is due to certain natural conditions. Hence, it is acceptable. Due to higher generation, the impact on additionality for each SPV was also checked and is summarized in the table below.

Name of the SPVs	Actual PLF obtained during the current monitoring period	Equity IRR as per registered VCS PD	Equity IRR the with actual PLF	Benchmark
Cleansolar Renewable Energy Private Limited	20%	9.87%	12.2%	15.17%
Divine Solren Private Limited	21%	8.37%	12.38%	15.17%
Astra Solren Private Limited	24%	4.34%	11.62%	15.39%
	24%	4.34%	11.62%	15.39%
Mahindra Susten Private Limited	23%	4.48%	10.58%	15.39%

From the table above, it can be observed that, the equity IRR values are still below the benchmark value. Hence, it is concluded that due to higher generation during the current monitoring period, there is no impact on the additionality.

APPENDIX 1: CALIBRATION DETAILS

The Energy Meters details for the project activity is as below.

Calibration and Meter Details of 30 MW solar project by Cleansolar Renewable Energy Private Limited

Meter Details	Main Meter	Check Meter
Meter Serial No	APX00619	APX00620
Meter Make	SECURE	SECURE
Accuracy Class	0.2 s	0.2 s
Date of Calibration ¹⁰	28-05-16	28-05-16
Due date of Calibration	27-05-2021	27-05-2021

Calibration and Meter Details of 50 MW solar project by Divine Solren Private Limited

Meter Details	Main Meter	Check Meter	Standby Meter
Meter Serial No	APZ00292	APZ00293	APZ00294
Meter Make	SECURE	SECURE	SECURE
Accuracy Class	0.2 s	0.2 s	0.2 s
Date of Calibration ¹¹	01-06-17	01-06-17	01-06-17
Due date of Calibration	31-05-2022	31-05-2022	31-05-2022

Calibration and Meter Details of 40 MW solar project by Astra Solren Private Limited

Meter Details				
Meter Serial No	GJ 3830 A	GJ 3831 A	GJ 3832 A	GJ 3833 A
Meter Make	SECURE	SECURE	SECURE	SECURE
Accuracy Class	0.2 s	0.2 s	0.2 s	0.2 s
Date of Calibration	24-03-17	24-03-17	24-03-17	24-03-17
Due date of Calibration ¹²	23-03-2022	23-03-2022	23-03-2022	23-03-2022

¹⁰ The Calibration frequency of the energy meter is once in five year. Hence, the calibration is valid till 27-05-2021. Hence, during the current monitoring period, delay in calibration is not applicable.

¹¹ The Calibration frequency of the energy meter is once in five year. Hence, the calibration is valid till 27-05-2021. Hence, during the current monitoring period, delay in calibration is not applicable.

¹² The Calibration frequency of the energy meter is once in five year. Hence, the calibration is valid till 27-05-2021. Hence, during the current monitoring period, delay in calibration is not applicable.

Calibration and Meter Details of 25 MW solar project by Astra Solren Private Limited

Meter Details		
Meter Serial No	Y0319340	Y0319341
Meter Make	SECURE	SECURE
Accuracy Class	0.2 s	0.2 s
Date of Calibration	24-03-17	24-03-17
Due date of Calibration ¹³	23-03-2022	23-03-2022

Calibration and Meter Details of 60 MW solar project by Mahindra Susten Private Limited

Meter Details	Main Meter	Check Meter
Meter Serial No	15624818	15624819
Meter Make	L & T	L & T
Accuracy Class	0.2 s	0.2 s
Date of Calibration	21-12-2016 to 23-12-2016	
Due date of Calibration ¹⁴	22-12-2021	

¹³ The Calibration frequency of the energy meter is once in five year. Hence, the calibration is valid till 27-05-2021. Hence, during the current monitoring period, delay in calibration is not applicable.

¹⁴ The Calibration frequency of the energy meter is once in five year. Hence, the calibration is valid till 27-05-2021. Hence, during the current monitoring period, delay in calibration is not applicable.