

WIND POWER PROJECT AT RAJKOT, GUJARAT



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Contact Information (optional)

Project Title	Wind Power Project at Rajkot, Gujarat
Version	001
Date of Issue	01/05/2013
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1 PROJECT DETAILS

1.1 Summary Description of the Project

Introduction:

ReNew Wind Energy (Rajkot) Private Limited (RNWERPL), the Project Proponent (PP), is setting up wind power project of 25.2 MW capacity at Villages: Godladha, Madhavipur, Kalasar, Devpara of Rajkot district of Gujarat. The project consists of installation of 12 Suzlon make wind turbines of 2.1 MW capacity each.

Purpose of the Project activity:

The purpose of the project activity is to generate electricity using wind as renewable energy source and helping in reducing usage of fossil fuels which are used for electricity generation. This would reduce the dependency on fossil fuels and reduce the Green House Gas (GHG) emissions.

Baseline Scenario¹:

The Project activity would use wind energy to generate electricity from the project and export it to NEWNE (Northern, Eastern, Western and North-Eastern) grid of India. Hence, it reduces the dependency on fossils fuels which are pre-dominantly used for electricity generation in India and helps reduction of climate change impacts.

Contribution to Sustainable Development:

National CDM Authority (Indian DNA), Ministry of Environment & Forests, Government of India has stipulated the following indicators for sustainable development in the interim approval guidelines for CDM projects²:

Social well-being:

Since, the project activity is in a rural area of Gujarat, it will help in the overall development of the region. The project activity will result in generation of direct and indirect employment opportunities for the local people residing nearby villages in Rajkot, both during construction and operation phases of the project activity.

Economic well-being:

The project will create a business opportunity for local stakeholders such as suppliers, manufacturers, contractors etc in Rajkot region of Gujarat.

Environmental well-being:

Since, the project uses wind as renewable source for power generation; it does not lead to any green house gas emission. It will avoid the fossil fuel consumption in the NEWNE grid and in turn it will result in SO_x, NO_x particulate matter emission reduction.

Technological well-being:

The technology that is being used in the project activity is environmentally safe and sound. The project demonstrates harnessing wind power potential in Gujarat and encourages setting up such projects in near future.

¹ Similar to the scenario existing prior to the prior to implementation of project activity

² http://www.cdmindia.gov.in/approval_process.php

Proposed action plan for Action Plan for Sustainable Development:

RNWERPL plans to use 2% of the net revenues accrued from the sale of Certified Emission Reductions (CERs) of this Project activity post its accrual in areas related to sustainable development. Detailed Credible Monitorable action plan is described in Annex 5 of this CDM PDD.

1.2 Sectoral Scope and Project Type

Sectoral Scope : 1, Energy industries (renewable / non renewable sources)

Type and Category : ACM 0002 "Consolidated baseline methodology for grid-connected electricity generation from renewable sources" (Version 12.3.0).

1.3 Project Proponent

ReNew Wind Energy (Rajkot) Private Limited (RNWERPL), is the Project Proponent (PP) & RNWERPL is also responsible for operation and maintenance of the Wind Turbine Generators (WTG's).

Organization name	ReNew Wind Energy (Rajkot) Private Limited
Street/P.O. Box	MG Road
Building	601-604 6 th Floor DLF Corporate Park
City	Gurgaon
State/Region	Haryana
Postcode	122001
Country	India
Telephone	+91- 124 – 4896670/80
Fax	-
E-mail	parag@renewpower.in
Website	http://renewpower.in/
Contact person	
Title	Chief Operating Officer
Salutation	Mr.
Last name	Sharma
Middle name	-
First name	Parag
Department	-
Mobile	-
Direct fax	+91- 124 – 4896670/80
Direct tel.	-
Personal e-mail	parag@renewpower.in

1.4 Other Entities Involved in the Project

Beside the Project Proponent as described in the section 1.3 of this Project Description, there is no other entity involved directly in the project

1.5 Project Start Date

As per VCS Standard: VCS Version3 (v 3.3), the project start date is the date on which the Project began generating GHG emission reductions or removals.

Therefore, the project start date for the project activity concerned is the earliest date of Commissioning amongst the WTGs in the project activity, i.e. **29th March 2012**.

Start Date: 29/03/2012

1.6 Project Crediting Period

Crediting Period Start Date: **29/03/2012**,

Crediting Period End Date: **28/03/2022**.

Total number of years: **10**

Possible renewal: **2 times**

1.7 Project Scale and Estimated GHG Emission Reductions or Removals

Project	Yes
Large project	No
Years	Estimated GHG emission reductions or removals (tCO ₂ e)
2012-2013	48.338
2013-2014	48.338
2014-2015	48.338
2015-2016	48.338
2016-2017	48.338
2017-2018	48.338
2018-2019	48.338
2019-2020	48.338
2020-2021	48.338
2021-2022	48.338
Total estimated ERs	483,380
Total number of crediting years	10
Average annual ERs	48,338

1.8 Description of the Project Activity

ReNew Wind Energy (Rajkot) Private Limited (RNWERPL), the Project Proponent (PP), is setting up wind power project of 25.2 MW capacities at Villages: Godladha, Madhavipur, Kalasar, Devpara of Rajkot district of Gujarat. The project consists of installation of 12 Suzlon make wind turbines of 2.1 MW capacity each.

1.9 Project Location

Project involves setting up wind power project of 25.2 MW capacities at Villages: Godladha, Madhavipur, Kalasar, Devpara of Rajkot district of Gujarat. The project consists of installation of 12 Suzlon make wind turbines of 2.1 MW capacity each. Detailed location of project WTG's are as bellows-

Location No.	Village/Taluka/District/State	Geographical Coordinates
G 034	Godladhar/Jasdan/Rajkot/Gujarat	N22 02 39.2 E71 18 58.5
G 036	Godladhar/Jasdan/Rajkot/Gujarat	N22 03 01.8, E71 18 08.2
G 037	Madhavipur/Jasdan/Rajkot/Gujarat	N22 03 33.6 , E71 18 01.5
G 038	Godladhar/Jasdan/Rajkot/Gujarat	N22 02 52.1 E71 18 58.9
G 039	Godladhar/Jasdan/Rajkot/Gujarat	N22 03 14.8 E71 18 45.6
G 041	Madhavipur/Jasdan/Rajkot/Gujarat	N22 03 47.3, E71 17 49.0
G 042	Madhavipur/Jasdan/Rajkot/Gujarat	N22 03 45.5, E71 18 10.6
G 046	Kalasar /Jasdan/Rajkot/Gujarat	N22 05 06.0, E71 16 42.6
G 055	Devpara /Jasdan/Rajkot/Gujarat	N22 06 04.6, E71 14 19.7
G 056	Devpara /Jasdan/Rajkot/Gujarat	N22 06 18.1, E71 14 15.1
G 068	Madava /Jasdan/Rajkot/Gujarat	N22 08 36.6, E71 14 06.0
G 112	Kalasar/Jasdan/Rajkot/Gujarat	N22 04 54.0, E71 16 18.0

1.10 Conditions Prior to Project Initiation

Project Activity is a Greenfield Project activity.

1.11 Compliance with Laws, Statutes and Other Regulatory Frameworks

Project activity has complied with all statutory requirements as per State regulations & received commissioning certificate form state regulatory authorities.

1.12 Ownership and Other Programs

1.12.1 Right of Use

The ownership of the Project and its right to use is completely entrusted to ReNew Wind Energy (Rajkot) Private Limited. The same can be verified by the following evidences:

- I. Commissioning certificates as issued by Gujarat Energy Development Agency (GEDA), vide Letter No. GEDA/PWF/SGWPL-RWEPL/Jasdan/12-13/255, dated 26/04/2012
- II. Commissioning certificates as issued by Gujarat Energy Development Agency (GEDA), vide Letter No. GEDA/PWF/SGWPL-RWEPL/Jasdan/12-13/1013, dated 11/06/2012
- III. Host Country Approval by National CDM Authority, Government of India, vide Letter No. 4/12/2012-CCC, dated 10/10/2012

1.12.2 Emissions Trading Programs and Other Binding Limits

The requirements of the VCS Project Description pertaining to this section have been addressed as follows:

“Where projects reduce GHG emissions from activities that are included in an emissions trading program or any other mechanism that includes GHG allowance trading, evidence shall be provided that the GHG emission reductions or removals generated by the project have not and will not be otherwise counted or used under the program or mechanism. Such evidence may include:

- 1) A letter from the program operator designated national authority or other relevant regulatory authority that emissions allowances (or other GHG credits used in the program) equivalent to the reductions or removals generated by the project have been cancelled from the program or national cap, as applicable.
- 2) Evidence of the purchase and cancellation of GHG allowances equivalent to the GHG emissions reductions or removals generated by the project related to the program or national cap.
- 3) Evidence from the program operator, designated national authority or other relevant regulatory authority stating that the specific GHG emission reductions or removals generated by the project or type of project are not within the scope of the program or national cap.” The host country of the project activity under consideration, i.e., India is a non Annex-I, or, a developing nation as recognised by the Kyoto Protocol. Hence, there are no GHG emission reduction targets or commitments for India and it does not fall under the purview of any compliance driven Emission Trading Programs.

Furthermore, there are also no such voluntary emission trading Programs similar to the VCS existent in the country. This confirms there are no emissions trading programs prevalent in the host country of the project activity under consideration, i.e., India at the time of preparation of the VCS PD. The host country of the project activity, India, being a non Annex-I nation under the Kyoto Protocol, India does not have GHG emission reduction targets or commitments. This confirms there are no national caps on GHG emissions prevalent in India at the time of preparation of the VCS PD. Therefore, it is not applicable for the project activity.

1.12.3 Participation under Other GHG Programs

The project has been successfully registered as CDM project with CDM Executive Board of United Nation Framework Convention on Climate Change (UNFCCC).

CDM Project ID: 8095

Registration Date: 9th November 2012

1.12.4 Other Forms of Environmental Credit

We herewith confirm that Project has registered under CDM program of UNFCCC dated 9th November 2012 & will avail benefits under CDM from 9th November 2012 onwards. Pre-CDM Generation will be claimed under VCS programs & we will take all precautions to avoid double counting of emission offsets.

The project neither has nor intended to generate any other form of GHG related environmental credit for the GHG emission reduction or removal claimed under the VCS programme. A declaration from the project proponent has been provided to the Validator.

1.12.5 Projects Rejected by Other GHG Programs

Project has not rejected from any other GHG programs.

1.13 Additional Information Relevant to the Project

Eligibility Criteria

Project activity is a single project owned by single Project Proponent.

Leakage Management

Not Applicable.

Commercially Sensitive Information

Not applicable.

Further Information

Not Applicable.

2 APPLICATION OF METHODOLOGY

2.1 Title and Reference of Methodology

Title: "Consolidated baseline methodology for grid-connected electricity generation from renewable sources" ACM0002 (Version 12.3.0)

Reference:

ACM0002 (Version 12.3.0) draws upon the following tools which have been used in the PDD:

1. Tool to calculate the emission factor for an electricity system (Version 02.2.1)
2. Tool for demonstration and assessment of additionality (Version 6.0.0)

2.2 Applicability of Methodology

Sr. No	Applicability criterion	Justification
1	This methodology is applicable to grid-connected renewable power generation project activities that : (a) install a new power plant at a site where no renewable power plant was operated prior to the implementation of the project activity (greenfield plant); (b) involve a capacity addition; (c) involve a retrofit of (an) existing plant(s); or (d) involve a replacement of (an) existing plant(s).	The project activity is a greenfield plant grid-connected renewable power generation project. Hence, it meets the applicability criteria
2	The methodology is applicable under the following conditions: - The project activity is the installation, capacity addition, retrofit or replacement of a power plant/unit of one of the following types: hydro power plant/unit (either with a run-of-river reservoir or an accumulation reservoir), wind power plant/unit, geothermal power plant/unit, solar power plant/unit, wave power plant/unit or tidal power plant/unit; - In the case of capacity additions, retrofits or replacements (except for capacity addition projects for which the electricity generation of the existing power plant(s) or unit(s) is not affected): the existing plant started commercial operation prior to the start of a minimum historical reference period of five years, used for the calculation of baseline emissions and defined in the baseline emission section, and no capacity addition or retrofit of the plant has been undertaken between the start of this minimum historical reference period and the implementation of the project activity;	The Project activity involves installation of a new power plant at a site where no renewable power plant was operated prior to the implementation of the project activity (Greenfield plant). Hence, it meets the requirement.
3	In case of hydro power plants: At least one of the following conditions must apply: - The project activity is implemented in an existing single or multiple reservoirs, with no change in the volume of any of the reservoirs; or - The project activity is implemented in an existing single or multiple reservoirs, where the volume of any of reservoirs is increased and the power density of each reservoir, as per the definitions given in the Project Emissions section, is greater than 4 W/m² after the implementation of the project activity; or - The project activity results in new single or multiple reservoirs and the power density of each reservoir, as	Not applicable to the Project activity as the Project activity involves installation of a wind power plant.

	per the definitions given in the Project Emissions section, is greater than 4 W/m^2 after the implementation of the project activity.	
4	In case of hydro power plants using multiple reservoirs where the power density of any of the reservoirs is lower than 4 W/m^2 after the implementation of the project activity all of the following conditions must apply: • The power density calculated for the entire project activity using equation 5 is greater than 4 W/m^2; • All reservoirs and hydro power plants are located at the same river and were designed together to function as an integrated project that collectively constitutes the generation capacity of the combined power plant; • The water flow between the multiple reservoirs is not used by any other hydropower unit which is not a part of the project activity; • The total installed capacity of the power units, which are driven using water from the reservoirs with a power density lower than 4 W/m^2, is lower than 15 MW; • The total installed capacity of the power units, which are driven using water from reservoirs with a power density lower than 4 W/m^2, is less than 10% of the total installed capacity of the project activity from multiple reservoirs.	Not applicable to the Project activity as the Project activity involves installation of a wind power plant.
5	The methodology is not applicable to the following: Project activities that involve switching from fossil fuels to renewable energy sources at the site of the project activity, since in this case the baseline may be the continued use of fossil fuels at the site; Biomass fired power plants; A hydro power plant that results in the creation of a new single reservoir or in the increase in an existing single reservoir where the power density of the reservoir is less than 4 W/m^2	The Project activity is installation of a wind power plant and hence does not involve the following- • Switching from fossil fuels to renewable energy sources at the sites • Biomass fired power plants • Hydro power plants

2.3 Project Boundary

Source		GHGs	Included?	Justification/Explanation
Baseline scenario	CO ₂ emissions from electricity generation in fossil fuel fired power plants that are displaced due to the project activity	CO ₂	Yes	In the baseline scenario, electricity would be sourced from the NEWNE Grid which in turn would have been connected to fossil fuel fired power plants which emit CO ₂ .
		CH ₄	No	No methane emission is expected.
		N ₂ O	No	No nitrous oxide emission is expected.
Project scenario	Greenfield wind energy conversion system	CO ₂	No	The project activity does not emit carbon dioxide.
		CH ₄	No	No methane emission is expected.
		N ₂ O	No	No nitrous oxide emission is expected.

2.4 Baseline Scenario

The Project activity is the installation of a wind energy project which is a Greenfield project and does not involve any modifications or replacements and capacity additions.

ACM0002 version 12.3.0 clearly states that if the Project activity is the installation of a new grid-connected renewable power plant/ unit, the baseline scenario is the following:

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, as reflected in the combined margin (CM) calculations described in the "Tool to calculate the emission factor for an electricity system."

Electricity generated from the Project activity will be supplied to the NEWNE grid. In the absence of Project activity, quantity of the electricity that would be delivered by the Project activity to the NEWNE grid would be sourced from the existing grid-connected power plants and future capacity additions to meet the growing electricity requirements. Hence, generation mix of NEWNE grid is considered as the baseline scenario.

All data used to establish the baseline scenario are tabulated below³.

Particulars	2008-09	2009-10	2010-11
Simple Margin (tCO ₂ /MWh)	1.0066	0.9777	0.9707

³ As per CEA CO₂ baseline database Version 07 available at <http://www.cea.nic.in/>

Net Generation in OM (GWh)	421,803	458,043	476,987
Net electricity import from ER (GWh)	5,897	5341.1	5610
Net generation incl imports (GWh)	427,700	463,384	482,597
Weightage of operating margin emissions factor	0.75		
Weightage of build margin emissions factor	0.25		

2.5 Additionality

Please The demonstration of additionality for the proposed Project activity is being carried out in accordance with the additionality tool provided by the UNFCCC i.e. “*Tool for demonstration and assessment of Additionality*” Version 6.0.0. The tool provides a step-wise approach to demonstrate additionality which is displayed below:

Step 1: Identification of alternatives to the project activity consistent with current laws and regulations

Sub-step 1a: Define alternatives to the project activity:

Identify realistic and credible alternative(s) available to the project participants or similar project developers that provide outputs or services comparable with the proposed CDM project activity.

The project proponent is setting up wind power project of 25.2 MW capacity in Rajkot district of Gujarat. It consists of installation of 12 Suzlon make wind turbines of 2.1 MW capacity each. As the purpose of the Project activity is to generate electrical power to be fed to the grid, the following alternatives are considered:

Alternative 1: The proposed project activity not undertaken as a CDM project activity.

The project proponent could proceed with the implementation of the project without CDM benefits. The electricity produced from the renewable energy project would have been sold to the grid. This is in compliance with all applicable legal and regulatory requirements and can be a part of the baseline. However, the Project activity is not feasible without CDM revenues. This argument has been discussed in step 2 of the Additionality section.

Alternative 2: No proposed project activity and equivalent amount of energy would have been produced by the grid electricity system through its currently running power plants and by new capacity addition to the grid i.e. Continuation of the present situation.

The project proponent would have continued without investment in project activity with usual business activities. The grid would continue with the fossil fuel based power projects and this would result in GHG emissions. Hence, the new capacity add-on from a fossil fuel based power plant is appropriate, realistic & credible baseline alternative for the project activity.

Outcome of Sub-step 1a: All the realistic alternatives for the project activity have been enlisted above.

Sub-step 1b: Consistency with mandatory laws and regulations:

The alternative(s) shall be in compliance with all applicable legal and regulatory requirements, even if these laws and regulations have objectives other than GHG reductions, e.g. to mitigate local air pollution. (This sub-step does not consider national and local policies that do not have legally-binding status.).

The relevant national laws and regulations pertaining to generation of energy in India are:

- Electricity Act 2003
- National Electricity Policy 2005
- Tariff Policy 2006

The Project activity conforms to all the applicable laws and regulations in India:

- Power generation using wind energy is not a legal requirement or a mandatory option. There are state and sectoral policies, framed primarily to encourage wind power projects. These policies have also been drafted realizing the extent of risks involved in the projects and to attract private investments.
- The Indian Electricity Act, 2003 (May 2007 Amendment) does not influence the choice of fuel used for power generation.
- There is no legal requirement on the choice of a particular technology for power generation.

Outcome of Sub-step 1b: Hence, both the alternatives enlisted above are found to comply with the mandatory laws and regulations taking into account the enforcement of the legislations in the region or country and EB decisions on national and/or sectoral policies and regulations. Alternative 2 has been selected as the appropriate baseline alternative.

Step 2: Investment analysis

Determine whether the proposed project activity is economically or financially less attractive than at least one other alternative, identified in step 1, without the revenue from the sale of certified emission reductions (CERs). To conduct the investment analysis, use the following sub-steps:

Sub-step 2a: Determine appropriate analysis method

The Project activity envisages generation of revenues by exporting the electricity to NEWNE grid. Thus, simple cost analysis cannot be used as the analysis method as the sale of the units of generated electricity shall result in a revenue stream during the operations of the Project activity.

After eliminating Option I, the use of Benchmark analysis (Option III) is the method of analysis that has been selected as the most suitable method. This method determines the attractiveness of the project activity for the investors, as well as provides a measure of the viability of the investment to generate revenues during its operation, as compared with other avenues and investment options. Hence, the Benchmark analysis method is to be employed for analysis of the said project.

Sub-step 2b (Option III): Apply benchmark analysis

The investment analysis using Benchmark analysis approach (Option III) has been chosen. Further, this method illustrates the evaluation of the Project by the PP before the decision to undertake the project was taken and management approval granted.

Choice of Financial Indicator: As allowed by the Guidance on the Assessment of Investment Analysis (Version 5.0)⁴, Equity Internal Rate of Return (IRR) was selected as the financial indicator to assess the attractiveness of the project.

Choice of Benchmark:

The Fisher equation⁵ in financial mathematics and economics estimates the relationship between nominal and real interest rates under inflation. It is named after Irving Fisher who was famous for his works on the theory of interest. In finance, the Fisher equation is primarily used in yield to maturity calculations of bonds or IRR calculations of investments. In economics, this equation is used to predict nominal and real interest rate behavior.

Letting i denote the nominal interest rate, R denote expected real rate of return, and let I denote the inflation rate, the Fisher equation is:

⁴ http://cdm.unfccc.int/Reference/Guidclarif/reg/reg_guid03.pdf

⁵ Aswath Damodaran, Book on Investment Valuation _2nd edition (Page 8 of Chapter 13)

$$r = (1 + I) * (1 + R) - 1$$

According to above discussion and as per Section IV Selection and Validation of Appropriate Benchmarks, Point 15 of Guidelines on the assessment of the investment analysis (Version 05, EB 62), the value for cost of equity is selected from Appendix. The value of Return on Equity for Group-1 projects in India is 11.75%.

As per paragraph 7 of Appendix of the above mentioned document,
In situations where an investment analysis is carried out in nominal terms, project participants can convert the real term values provided in the table below to nominal values by adding the inflation rate. The inflation rate shall be obtained from the inflation forecast of the central bank of the host country for the duration of the crediting period. If this information is not available, the target inflation rate of the central bank shall be used. If this information is also not available, then the average forecasted inflation rate for the host country published by the IMF (International Monetary Fund World Economic Outlook) or the World Bank for the next five years after the start of the project activity shall be used.

Thus, the inflation forecast value has been considered as 5.40%⁶ forecasted value for the crediting period chosen by the Central Bank (Reserve Bank of India) of the host country.

Therefore substituting I = 5.40% and R = 11.75% in the above equation, we get

$$r = (1 + 0.054) * (1 + 0.1175) - 1$$

i.e. $r = 17.7845\%$

Thus, the benchmark for the project activity has been estimated as **17.78%**.

The Project Proponent has conducted financial analysis taking the Equity IRR as the financial indicator to prove additionality. The Equity IRR has been calculated to be **7.26%**

Key assumptions used for Equity IRR calculations are listed below:

Particulars	Value	Unit	Source
No. of wind turbines	12	Nos	Suzlon Offer
Capacity of each wind turbine	2.1	MW	Suzlon Offer
Capacity of the project	25.2	MW	Calculated
Net Generation	50.73	Million kWh	Wind Assessment Study - AWS Truepower, LLC - Table 6 (Pg.19)
Net Generation	4.23	Million kWh per Machine	Calculated
Net PLF	23.0%	%	Calculated
No. of wind turbines opting for Pref. Tariff Model	7	Nos	Assumed at the time of decision making
No. of wind turbines opting for Open Access Model	5	Nos	Assumed at the time of decision making
Project cost	1,464.996	INR Million	Calculated
Debt	70%	INR Million	GERC Wind Power Tariff Order (dt. 31-01-2010), Page 15
Debt Contribution	1025.43	INR Million	Calculated

⁶ <http://rbi.org.in/scripts/PublicationsView.aspx?id=10294>

Equity Contribution	439.47	INR Million	Calculated
Operation and Maintenance Cost (first year)	0.65	INR Million Per MW	GERC Wind Power Tariff Order (dt. 31-01-2010), Page 14
Escalation in O & M	5%	%	GERC Wind Power Tariff Order (dt. 31-01-2010), Page 14
Service Tax on O&M	10.30%	%	Indian IT Act
Open Access Tariff	3.90	Rs/kWh	Assumed at the time of decision making
Preferential Tariff	3.56	Rs/kWh	http://www.gercin.org/renewablepdf/en_1303211765.pdf
Depreciation Rate (Companies Act) - Plant & Machinery	5.28%	%	The Companies Act,1956 - SCHEDULE XIV
IT Depreciation Rate - Plant & Machinery	7.69%	%	Indian IT Rules, Appendix IA
Income tax rate	33.22%	%	Indian IT Act for FY 2011-12
Interest rate	13.25%	%	SBI BPLR Minus 1% (as per GERC Tariff Order (dt. 31-01-2010)) Link: SBAR as on 11-July-2011 http://in.reuters.com/article/2012/01/09/india-plr-idINL3E8C962820120109
Debt repayment	10	Years	GERC Tariff Order (dt. 31-01-2010), Page 16
Salvage value	10%		GERC Tariff Order (dt. 31-01-2010), Page 22
MAT rate	19.93%		Indian IT Act for FY 2011-12
GBI	0.5	Rs/kWh	MNRE GBI Guidelines, Page 2
GBI cumulative cap	6.2	INR Million per MW	MNRE GBI Guidelines, Page 2
Max. GBI allowed in a year	1.55	INR Million per MW	MNRE GBI Guidelines, Page 2
Max. GBI allowed in a year	22.785	INR Million	Calculated
GBI cumulative cap	91.14	INR Million	Calculated
Max duration for GBI	10	Years	MNRE GBI Guidelines, Page 2

Sub-step 2c: Sensitivity Analysis:

As per guidance provided in the latest version of “Tool for the demonstration and assessment of additionality”, the variables, including the initial investment cost, that constitute more than 20% of total project costs or total project revenues have been identified and subjected to a reasonable variation and the results of this variation have been presented below:

Change in net generation	+10.00%	0.00%	-10.00%	Break-Even Point	51%
Equity IRR	9.43%	7.26%	4.75%		17.93%
Change in Power Sale tariff	+10.00%	0.00%	-10.00%	Break-Even Point	52%
Equity IRR	9.41%	7.26%	4.76%		17.96%
Change in O&M Cost	+10.00%	0.00%	-10.00%	Break-Even Point	-394%
Equity IRR	6.93%	7.26%	7.58%		17.72%
Change in Total Project Cost	+10.00%	0.00%	-10.00%	Break-Even Point	-36%
Equity IRR	5.21%	7.26%	9.40%		17.94%

The purpose of the sensitivity analysis is to demonstrate the sensitivity of the returns from the Project activity due to uncertainty in plant load factor, capital cost and O&M costs. This is an assessment of the impact of variations in above parameters from the assumed/design values, and represents magnitude of effects of these variations on the returns from the Project activity.

It can be observed from above table that in various scenarios wherein there are changes in tariff and REC prices, O&M cost, net saleable units and project's capital cost, the Equity IRR does not cross the benchmark. Thus, it can be concluded that revenue from sale of CERs is important to alleviate this gap and hence the project has been considered to be additional.

Step 4 – Common practice Analysis

In the context of the present project activity, the following parameters are defined in line with paragraphs 5 – 10 of this approved methodological tool:

Measure: As per paragraph 6, the project activity falls under the following measure:

“(b) Switch of technology with or without change of energy source (including energy efficiency improvement as well as use of renewable energies);”

Output: As per paragraph 7, “power generation” may be considered to be the output in the context of the project activity. Further as per Step 1 of paragraph 47 of the same tool, the applicable output range will be 12.6 MW to 37.8 MW, i.e. $\pm 50\%$ of installed capacity of the project activity (25.2MW)

As per paragraph 47 of the approved methodological tool, the following Stepwise approach has been followed by the project activity to demonstrate that it is not a Common Practice in the applicable geographical area:

Step 1: Calculate applicable output range as $\pm 50\%$ of the design output or capacity of the proposed project activity

The capacity of the project activity is 25.2 MW. The project capacity has been subject to the variation in the range of $\pm 50\%$, the following table depicts the outcome of the variation applied. Hence, the applicable output range will be 12.6 MW to 37.8 MW, i.e. $\pm 50\%$ of installed capacity of the project activity

Step 2: In the applicable geographical area, identify all plants that deliver the same output or capacity, within the applicable output range calculated in Step 1, as the proposed project activity and have started commercial operation before the start date of the project. Note their number N_{all} . Registered CDM project activities shall not be included in this step.

India has been considered applicable geographical area as a default, for the common practice analysis of project activity. All power plants generating electricity within the capacity range of 12.6 MW to 37.8 MW and having commercial operations date before project activity start date have been considered in this analysis. The power generation plants identified in this step are hydro, thermal, nuclear, biomass based, solar and wind power projects. The total number of power plants in the applicable output range = 320.

Category of Power plants	No. of Projects
Thermal	94
Hydro	209
Wind*	32
Nuclear	0
Solar	0
Biomass	123
Total (Nall)	458

Therefore $N_{all} = 458$

Note: Registered/under validation CDM project activities have been excluded in this step. The spreadsheet containing the list of the plants identified has been provided separately to the DOE.

Step 3: Within plants identified in Step 2, identify those that apply technologies different that the technology applied in the proposed project activity. Note their number N_{diff} .

In accordance with Guidelines on Common practice following criterion has been used to arrive at the number of different technology power plants;

Different technologies in the context of the project activity:

Energy Source / Fuel

The project activity involves electricity generation from wind. The other project activities using water (Hydro, Biomass, Solar), conventional fuels (Coal, Lignite, Natural Gas & Liquid Fuel based – i.e. Thermal) as energy sources for the generation of electricity respectively are considered as plants with different technologies and included under N_{diff} .

The N_{diff} value is thus arrived at as tabulated below:

Category of Power plants	No. of Projects
Thermal	94
Hydro	209
Wind	0
Nuclear	0
Solar	0
Biomass	123
Total (Ndiff)	426

Step 4: Calculate factor $F=1-N_{diff}/N_{all}$ representing the share of plants using technology similar to the technology used in the proposed project activity in all plants that deliver the same output or capacity as the proposed project activity

Nall	458
Ndiff	426
Nall - Ndiff	32
$F = 1-N_{diff}/N_{all}$	0.0699

The factor F and Nall-Ndiff is calculated and following values are arrived at;

$$F = 0.0699$$

$$N_{all}-N_{diff} = 32$$

As value of F is less than 0.2 so it can be concluded that the project activity is not a common practice in the applicable geographical area.

The above discussions show that wind power development is not a common practice in the applicable geographical area and the Project activity is not financially attractive; hence the Project activity is additional.

In view of the above, the PP had considered CDM as a source of additional revenue to improve financial viability of the project while deciding to make invest in the Project activity.

The chronology of events related to the Project activity and the efforts of the PP to secure CDM funding for the Project activity are summarized below:

Sr. No.	Event	Date
1.	Board Decision making to invest in the project activity	10/08/2011
2.	Purchase order for wind turbines placed (Start date)	26/08/2011
3.	CDM Prior consideration notification to UNFCCC & DNA (MoEF)	07/11/2011
4.	Stakeholders meeting	23/11/2011
5.	Appointment of DoE	17/02/2012
6.	Commissioning date of the project	29/03/2012

2.6 Methodology Deviations

N/A

3 QUANTIFICATION OF GHG EMISSION REDUCTIONS AND REMOVALS

3.1 Baseline Emissions

Baseline Emissions

As per the equation 6 of the methodology ACM 0002 (Version 12.3.0),

$$BE_y = EG_{PJ,y} \cdot EF_{grid,CM,y} \quad (1)$$

Where:

BE_y Baseline emissions in year y (tCO_2e/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 CDM project activity in year y (MWh/yr)

$EF_{grid,CM,y}$ Combined margin CO_2 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" (tCO_2e/MWh)

Calculation of $EG_{PJ,y}$

The methodology ACM 0002 (Version 12.3.0) has procedures for calculation of $EG_{PJ,y}$ for the following cases:

- (a) Greenfield plants,
- (b) Retrofits and replacements, and
- (c) Capacity additions.

As all the three projects included in the proposed CDM project activity are Greenfield plants, option (a) as provided in the methodology ACM 0002 (Version 12.3.0) shall be applicable and is described below:

"If the project activity is the installation of a new grid-connected renewable power plant/unit at a site where no renewable power plant was operated prior to the implementation of the project activity, then:

$$EG_{PJ,y} = EG_{facility,y} \quad (2)$$

Where:

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

$EG_{facility, y}$ Quantity of net electricity generation supplied by the project plant/unit to the grid in year y (MWh/yr)"

Calculation of $EF_{grid, CM, y}$

The methodology ACM 0002 (Version 12.3.0) requires that the combined margin for the grid be calculated in accordance with the procedure provided in the "Tool to calculate the emission factor for an electricity system".

As per version 02.2.1 of Tool to calculate emission factor for an electricity system, following steps are included in the calculation of the emission factor for the baseline scenario:

- STEP 1: Identify the relevant electricity systems.
- STEP 2: Choose whether to include off-grid power plants in the project electricity system (optional).
- STEP 3: Select a method to determine the operating margin (OM).
- STEP 4: Calculate the operating margin emission factor according to the selected method.
- STEP 5: Calculate the build margin (BM) emission factor
- STEP 6: Calculate the combined margin (CM) emissions factor.

The Central Electricity Authority (CEA) has published CO₂ baseline database in its version 7.0 (January, 2012). The values for OM, BM, CM are given excluding and including imports. For the present project activity, including imports are considered.

Step 1: Identifying the relevant electricity system

Grid/project electricity system is defined by the spatial extent of the power plants that are physically connected through transmission and distribution lines to the project activity (e.g. the renewable power plant location or the consumers where electricity is being saved) and that can be dispatched without significant transmission constraints.

The Southern grid and the NEWNE Grid form the two independent regional grids of India. As the project activity comprises the project activity located in the state of Gujarat, the NEWNE grid is applicable to the proposed CDM project.

Each state in a regional grid meets its own demand with its own generation facilities and also with allocation from power plants owned by the central sector. Depending on the demand and generation, there are electricity exports and imports between states in the regional grid. The volume of the net transfers between the regions in India is relatively small and electricity is largely produced and consumed within the same states. Consequently, it is appropriate to assume that the impacts of the project activity will be confined to the regional grid in which it is located. Hence for the purpose of estimation of the baseline emission factor, the NEWNE grid has been chosen as the relevant electricity system.

Step 2: Choose whether to include off-grid power plants in the project electricity system (optional).

Off-grid power plants have not been included in the project electricity system

Step 3: Selection of an Operating Margin method

The project proponent wishes to use the Simple Operating Margin (OM) method for the estimation of the baseline. The use of the Simple OM method is justified as the share of the low cost/ run resources constitute less than 50% of the total grid generation.

The data pertaining to the total grid generation and the low/cost must run resources have been included in Annex 3.

	2006-07	2007-08	2008-09	2009-10	2010-11
NEWNE	18.5%	19.0%	17.4%	15.9%	17.6%
South	28.3%	27.1%	22.8%	20.6%	21.0%
India	20.9%	21.0%	18.7%	17.1%	18.4%

Note: As per the above information, it can be clearly established that the share of the low cost/ run resources constitute to less than 50% of the total grid generation.

With regards to data vintage, the project participant wishes to use the ex-ante option wherein the project proponent wishes to use the ex ante option wherein the emission factor is determined once at the validation stage, thus no monitoring and recalculation of the emissions factor during the crediting period is required.

Step 4: Calculation of the OM according to the Simple OM method

The simple OM emission factor is calculated as the generation-weighted average CO₂ emissions per unit net electricity generation (tCO₂e/MWh) of all generating power plants serving the system, not including low-cost / must-run power plants / units.

The data provided by the Central Electricity Authority (CEA), an official data source has been relied upon for the calculation of the OM. The same has been detailed in Annex 3. The latest version of the database, Version 7 (January, 2012) has been used. The OM calculations have been based upon generation data, fuel consumption and the Gross Calorific value (GCV) of the fuel.

Option A has been chosen for calculating Operating Margin emission factor for the project. OM has been determined based on fuel consumption and net efficiency generation of each power plant/ unit, since fuel consumption data for each power plant/ unit is available.

Assumptions

The following assumptions have been made in case of unavailability of data at station level:

Net generation: In case of stations where only gross generation is available, CEA standard values for auxiliary consumption have been applied to calculate the net generation data.

GCV: Default GCV values for some thermal power stations have been used for cases where station specific data was unavailable.

The following assumptions have been in case of unavailability of data at unit level:

Net generation: The data is not monitored at a unit level and hence the following assumptions have been made:

1. The auxiliary consumption (in % of gross generation) of the unit was assumed to be equal to that of the respective stations in the following cases:

- All units of a station fall into the build margin; or
- All units of a station have the same installed capacity; or
- The units in the station have different capacities but do not differ with respect the applicable standard auxiliary consumption.

2. In all other cases, standard values for auxiliary consumption adopted by CEA were applied.

Fuel consumption and GCV: Fuel consumption and GCV are generally not measured at unit level. Instead, the specific CO₂ emissions of the relevant units were directly calculated based on heat rates.

Calculation Approach

The Simple OM has been calculated using the following formula:

$$EF_{grid,OMsimple,y} = \frac{\sum_i (FC_{i,y} \times NCV_{i,y} \times EF_{CO_2,i,y})}{EG_y} \quad (3)$$

Where:

$EF_{grid, OM simple, y}$	Simple operating margin CO ₂ emission factor in year y (tCO ₂ e/MWh)
$FC_{i, y}$	Amount of fossil fuel type i consumed in the project electricity system in year y (mass or volume unit)
$NCV_{i, y}$	Net calorific value (energy content) of fossil fuel type i in year y (GJ/mass or volume unit)
$EF_{CO_2, i, y}$	CO ₂ emission factor of fossil fuel type i in year y (tCO ₂ e/GJ)
EG_y	Net electricity generated and delivered to the grid by all power sources serving the system, not including low-cost/must-run power plants/units, in year y (MWh)
i	All fossil fuel types combusted in power sources in the project electricity system in year y
y	The relevant year as per the data vintage chosen in Step 3

As per Annex 3, the last 3 year generation values are 1.0066, 0.9777 and 0.9707.

The 3-year generation-weighted average was taken and the same has been derived as $EF_{grid,OM,y} = 0.9842$

Step 5: Calculate the build margin emission factor

The build margin emissions factor is the generation-weighted average emission factor (tCO₂e/MWh) of all power units m during the most recent year y for which power generation data is available and will be calculated as follows:

$$EF_{grid,BM,y} = \frac{\sum_m EG_{m,y} \times EF_{EL,m,y}}{\sum_m EG_{m,y}} \quad (4)$$

Where:

$EF_{grid, BM, y}$	Build margin CO ₂ emission factor in year y (tCO ₂ e/MWh)
$EG_{m, y}$	Net quantity of electricity generated and delivered to the grid by power unit m in year y (MWh)
$EF_{EL, m, y}$	CO ₂ emission factor of power unit m in year y (tCO ₂ e/MWh)
m	Power units included in the build margin
y	Most recent historical year for which power generation data is available

As described above, the Build Margin would be calculated annually during the entire crediting period. For the purpose of ex-ante emission reduction calculations the most recent data available (from CEA for 2010-11) has been used and the build margin thus calculated is 0.8588

Therefore, $EF_{grid,BM,y} = 0.8588$

Step 6: Calculation of the combined Build Margin emission factor

The combined margin emission factor will be calculated as follows:

$$EF_{grid,CM,y} = EF_{grid,OM,y} \times W_{OM} + EF_{grid,BM,y} \times W_{BM} \quad (5)$$

Where,

$EF_{grid, BM, y}$ = Build margin CO₂ emission factor in year y (tCO₂e/MWh)
 $EF_{grid, OM, y}$ = Operating margin CO₂ emission factor in year y (tCO₂e/MWh)
 W_{OM} = Weightage of operating margin emissions factor (%)
 W_{BM} = Weightage of build margin emissions factor (%)

As per the 'Tool to calculate the Emission Factor for an electricity system' version 02.2.1, the default values for w_{OM} and w_{BM} are taken as 0.75 and 0.25 respectively as per the guidance provided for wind project activities for the first crediting period and subsequent crediting periods.

Hence, the Baseline Emission Factor is calculated using the formula stated below:

$$EF_{grid, CM, y} = W_{OM} * EF_{grid, OM, y} + W_{BM} * EF_{grid, BM, y}$$

Project Emissions

As per the guidance provided in the methodology ACM 0002 (Version 12.3.0), "For most renewable power generation project activities, $PE_y = 0$. However, some project activities may involve project emissions that can be significant. These emissions shall be accounted for as project emissions by using the following equation:

$$PE_y = PE_{FF,y} + PE_{GP,y} + PE_{HP,y} \quad (6)$$

Where:

PE_y Project emissions in year y (tCO₂e/yr)
 $PE_{FF,y}$ Project emissions from fossil fuel consumption in year y (tCO₂e/yr)
 $PE_{GP,y}$ Project emissions from the operation of geothermal power plants due to the release of non-condensable gases in year y (tCO₂e/yr)
 $PE_{HP,y}$ Project emissions from water reservoirs of hydro power plants in year y (tCO₂e/yr)

Leakage Emissions

The methodology ACM 0002 (Version 12.3.0) does not consider any leakage emissions.

Emission reductions

Emission reductions are calculated as follows:

$$ER_y = BE_y - PE_y \quad (7)$$

Where:

ER_y Emission reductions in year y (tCO₂e/yr)
 BE_y Baseline emissions in year y (tCO₂e/yr)
 PE_y Project emissions in year y (tCO₂e/yr)

3.2 Project Emissions

Nil

3.3 Leakage

Nil

3.4 Summary of GHG Emission Reductions and Removals:

Years	Estimated baseline emissions or removals (tCO ₂ e)	Estimated project emissions or removals (tCO ₂ e)	Estimated leakage emissions (tCO ₂ e)	Estimated net GHG emission reductions or removals (tCO ₂ e)
Year 1	48,338	0	0	48,338
Year 2	48,338	0	0	48,338
Year 3	48,338	0	0	48,338
Year 4	48,338	0	0	48,338
Year 5	48,338	0	0	48,338
Year 6	48,338	0	0	48,338
Year 7	48,338	0	0	48,338
Total	3,38,366	0	0	3,38,366

4 MONITORING

4.1 Data and Parameters Available at Validation

Data / Parameter	EF_{grid,OM,y}
Unit	tCO ₂ e/MWh
Description	Simple operating margin for NEWNE grid
Source of data	CO ₂ baseline database (Version 7.0) published by CEA in January 2012 ⁷
Value(s) applied	0.9842
Choice of data or Measurement methods and procedures	This value is calculated by taking weighted average of 3 years values for Simple Operating Margin of NEWNE grid viz. 2008-09 , 2009-10 and 2010-11
Purpose of data	Calculation of baseline emissions
Additional comment	Fixed ex-ante for entire crediting period

⁷ http://www.cea.nic.in/reports/planning/cdm_co2/cdm_co2.htm

Data / Parameter	EF_{grid,BM,y}
Unit	tCO ₂ e/MWh
Description	Build margin for NEWNE grid
Source of data	CO ₂ baseline database (Version 7.0) published by CEA in January 2012 ⁸
Value(s) applied	0.8588
Choice of data or Measurement methods and procedures	This value is taken from the latest value for Build Margin of NEWNE grid available at the time of web hosting of the PDD viz. 2010-11
Purpose of data	Calculation of baseline emissions
Additional comment	Fixed ex-ante for entire crediting period

Data / Parameter	W_{OM}
Unit	%
Description	Weightage of operating margin emissions factor
Source of data	Latest version of the “Tool to calculate the emission factor for an electricity system” (Version 02.2.1)
Value(s) applied	0.75
Choice of data or Measurement methods and procedures	Default values used as per the “Tool to calculate the emission factor for an electricity system” Version 02.2.1
Purpose of data	Calculation of baseline emissions
Additional comment	-

Data / Parameter	W_{BM}
Unit	%
Description	Weightage of operating margin emissions factor
Source of data	Latest version of the “Tool to calculate the emission factor for an electricity system” (Version 02.2.1)
Value(s) applied	0.25
Choice of data or Measurement methods and procedures	Default values used as per the “Tool to calculate the emission factor for an electricity system” Version 02.2.1
Purpose of data	Calculation of baseline emissions
Additional comment	-

⁸ http://www.cea.nic.in/reports/planning/cdm_co2/cdm_co2.htm

Data / Parameter	EF_{grid, CM, y}
Unit	tCO ₂ e/MWh
Description	Emission factor for NEWNE grid
Source of data	Calculated as per the procedure described in PDD section B.6.1
Value(s) applied	0.9528
Choice of data or Measurement methods and procedures	This value is calculated using EF _{grid,OM,y} and EF _{grid,BM,y} values as per Version 02.2.1 of methodological tool to calculate the emission factor for an electricity system
Purpose of data	Calculation of baseline emissions
Additional comment	-

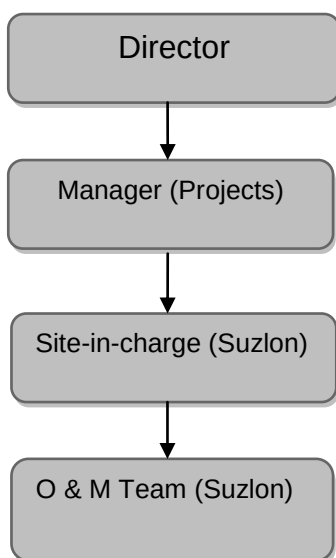
4.2 Data and Parameters Monitored

Data / Parameter	EG_{facility,y}
Unit	MWh/ year
Description	Quantity of net electricity generation supplied by the project plant/unit to the grid in year y
Source of data	Certificate for share of electricity generated by Wind farm provided by GETCO
Value(s) applied	50,733 MWh
Measurement methods and procedures	The electricity generated and fed into the grid shall be monitored using energy meters which are electronic tri-vector meters. <u>Monitoring</u>: Continuous measurement and at least monthly recording. <u>Archiving</u>: Electronic and Paper <u>Data type</u>: Measured & Calculated <u>Recording Frequency</u>: Continuous monitoring and monthly recording <u>Responsibility</u>: The O&M site-in-charge shall be responsible for the regular recording of data. <u>Calibration Frequency</u>: once in 3 years Accuracy Class: 0.2S (Active) and 0.5S (Reactive)
Monitoring frequency	Continuous measurement and at least monthly recording
QA/QC procedures	The Quantity of net electricity generation from the certificate for share of electricity will be cross-checked with the invoices for the sale of power by the project proponent. The meter(s) shall be calibrated and maintained by the state utility as per their own schedule and this frequency of meter calibration is not within the control of the Project Proponent.
Purpose of data	Calculation of baseline emissions
Additional comment	The data will be kept for two years after the end of the crediting period or the last issuance of CERs for this project activity, whichever occurs later.

4.3 Description of the Monitoring Plan

In Monitoring & Verification protocol, the objective is to have clear, credible and accurate monitoring, evaluation and verification procedures. This involves recording, data collection of all wind turbines, metering of electricity generated at substation, on daily basis as well as on monthly basis. The general conditions for metering, recording, meter readings, meter inspections, Test & Checking and communication shall be as per the Power Purchase Agreement with the state utility.

The project proponent proposes following arrangements in order to carry out metering and O & M activities for all wind turbines:



At 33 kV/66 kV Parveda substation (Currently managed by Suzlon), there are two feeders; Feeder 1 to which 7 wind turbines and Feeder 2 to which 5 wind turbines are connected. Main meter, check meter and ABT meters are located at the substation.

The detailed monitoring, recording and apportioning procedure has been described in appendix 3 of the CDM PDD. The meter readings will be reported to the site-in-charge and the compiled reports will be sent to the Manager (Projects) and Director. The Manager will monitor overall activity of the project and report to the Director. As per O & M schedule, the operation and maintenance activities will be carried out by trained and qualified technical staff of Suzlon. Each party shall maintain complete and accurate records and all other data required by each of them for the purposes of proper administration and the operation of the project.

5 ENVIRONMENTAL IMPACT

As per the Schedule 1 of the EIA notification dated 1/12/2009⁹, given by the Ministry of Environment and Forests under the Environment (Protection) Act 1986, the proposed Project activity does not fall under the list of activities requiring EIA as the environmental impacts for such project are not considered as significant by the host Party or Project Proponent.

⁹ <http://moef.nic.in/downloads/rules-and-regulations/3067.pdf>

Not applicable as the environmental impacts for such project are not considered as significant by the host Party or Project Proponent.

6 STAKEHOLDER COMMENTS

RNWERPL had identified stakeholders for their wind power project in Rajkot district of Gujarat. The meeting was conducted on 23/11/2011 at Jasdhan, Rajkot.

The PP had identified the local stakeholders who may be impacted by the project activity and invited them via invitation letters. The category of stakeholders invited is listed below:

1. Representatives from Suzlon
2. Employees of RNWERPL
3. Contractors and Vendors
4. Villagers from nearby villages in Rajkot

6.1. Summary of comments received

Meeting started with introductory speech by a local social leader. He introduced all attendees and the meeting agenda. The Project Proponent mentioned the meeting agenda then explained about Technical aspects of Project to stakeholders. He also explained about social, environmental & economical benefits of the Project. He also elaborated about CDM & its requirement. After detailed elaboration on Project, the meeting was open for discussion and feedback from stakeholders.

The villagers raised query that whether local villages would get electricity generated from the project. The Project Proponent answered that electricity generated would be exported to the grid of the State and the same cannot be distributed to the local villages due to technical difficulties. Then, villagers asked about any other benefits that local villages would receive. The project proponent replied that the project would help the local villagers in terms of direct and indirect employment generation. The project would also bring infrastructure facilities viz. Road in nearby villages.

To sum up the local villagers have given very positive response. They are one of the direct as well as indirect beneficiaries of the project. The construction and continuous operation of the project is providing employment opportunities for them. They have also express their support to project as it does not require any major displacement nor create any inconvenience to the local population. Wind being clean technology this will help in bridging the gap of power demand & generation with no pollution.

6.2. Report on consideration of comments received

There was no negative feedback from any of the stakeholders who attended the meeting. They in fact supported the initiative taken by the project proponent for carrying out such an activity in the region. Hence, there is no need to take due account of the comments.