Comments: Grid connected bundled small-scale wind project at Satara, Maharashtra, India

1. The project seems to be little to old with first installation commissioned in the year 2000 itself. The DOE may please confirm the start date eligibility, and also the reasons for such a long silence for applying CDM registration.
2. The DOE may please check the benefits available to the investor. This would mainly include – Sales tax benefits and Accelerated Depreciation Benefits. There exists a previous case law of misrepresentation of facts by Bajaj Auto where Sales Tax Benefits were not disclosed to the consultant writing the PDD on behalf of PP. This could be a repetition.
3. The project argues on the post implementation scenarios including the tariff policy of the state regulatory commission, which is absurd / not relevant to the investment decision.
4. The tariff policy of the state of Maharashtra is one of the best policies in country. The major features are:
   - Maharashtra is the only state offering highest tariff of INR 3.50/kWh
   - Maharashtra is the only state offering annual escalation of INR 0.15/kWh
   - Maharashtra is the only state offering longest energy purchase agreement of 13 years
   - Maharashtra is the only state offering options of sale of generated electricity to MSEDCL (Maharashtra State Electricity Distribution Company Limited – state owned utility), Reliance Energy (BSES) and Tata Power (private distribution companies of the state) along with option of sale to direct third parties running industrial establishments.
   - The utilities in Maharashtra are bound to procure electricity from RE sources under the present RPO (renewable purchase obligation)

Thus if the previous policy ends in 2008, the regulatory commission will at-least comply to the cost plus model for the project or else the PP can exercise other available options.

It is urged through the DOE that the project should present the facts relevant to the project at the time of implementation.