



ELLORA TIME LTD.

ORPAT INDUSTRIAL ESTATE, RAJKOT HIGHWAY,
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Monday, 10th December 2007

The Secretariat,
CDM Executive Board,
United Nations Framework Convention on Climate Change (UNFCCC),
Bonn, Germany.

Dear Sir,

Sub: Project under 'Request for Review' – "15.4 MW wind farm at Satara District, Maharashtra" (Ref. No: 0593) – Clarifications on Issues Associated with Verification requirements – sent reg.

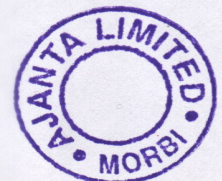
With reference to the communication received from the CDM Executive Board for "15.4 MW wind farm at Satara District, Maharashtra" (Ref. No: 0593), we, herewith furnish our response for your kind review.

The issues raised in the 'Request for Review' and our clarifications are as follows:

1. The monitoring plan and the approved methodology require double check of electricity supplied by the project activity with the receipt of sales. However, neither the monitoring report nor the verification report mentioned this double check. Further information is required on how the DOE verified the electricity generation of the project.

The project activity was undertaken to generate electricity through wind as the source of energy and then selling it to the third party. Surplus electricity at the end of the year would be purchased by the Maharashtra State Electricity Board (MSEB) as per the MERC Order dated 18th September 2003. The primary recording of the electricity fed to the state utility grid will be carried out jointly at the incoming feeder of the MSEB (state power utility). The joint measurement is being carried out once in a month in presence of both parties (the developer's representative and officials of the state power utility). This reading is then translated into a monthly generation report which is forwarded by MSEB to the project participant. In the monthly generation report, units for credit have been calculated after deduction of 5 % transmission losses and 2% wheeling losses from the net generation, which is export minus the import. This can be double checked, against the amount of electricity sold to the third party and the State electricity board (MSEB). The invoices raised by us towards the third party and MSEB have been submitted to the DOE for verification.

A sample of the monthly generation report issued by MSEB for the Month of November 2006, sample debit notes raised by us towards the third party for the months of August 2002 and March 2006 and the invoices raised by us towards MSEB for the purchase of surplus power have been attached for reference.



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2. The monitoring report stated that accuracy class for the meters is 0.5, while the verification report stated that the meter accuracy class is 0.2. Further clarification is required.

The main meter is installed and owned by MSEB, whereas the check meters are owned by us and the metering equipments is maintained in accordance with electricity standards. Although, the ownership of the check meter is with us, the responsibility of calibration for both main & check meters is with the state government electricity utility (MSEB). The calibration and other maintenance of the meters is done by MSEB as per the standard procedures.

For the current monitoring period, meters of 0.5 accuracy class were in position. The class of the meters to be installed in the project was not specified earlier in any document such as power purchase agreement. However, change of meters from class 0.5 to 0.2 have been recommended by Maharashtra State Electricity Distribution Company Limited (MSEDCL) as per their letter dated 28th December 2005 for the entire state of Maharashtra and this is just a step to upgrade the technology used to measure generation. The implementation of the new class meters was to be done by MSEB in a phased manner and hence, the meters for the project were not changed in the current monitoring period. However, one of the meters got replaced by a 0.2 class meter in September 2007 (proof for the same has been attached for reference). The readings taken by 0.5 class meters are acceptable by MSEB and this is proved by the fact that MSEB is giving credit for the generation based on these readings.

Further, a letter from MSEDCL clearly mentions that the variation in the accuracy class of meters does not have any effect on the amount of generation from the turbines. Hence, the quantity of CERs also does not get affected.

Documentary proofs for the above mentioned facts are furnished as Annexure 1, 2, 3, 4, 5, 6 & 7.

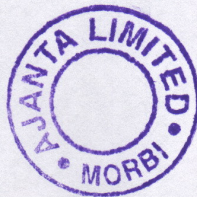
We have furnished all the facts in a transparent manner and hope that the explanation provided above is satisfactory and acceptable.

We kindly request you to issue the CERs generated by the project.

Thanking you,

Yours truly,
For Ellora Time Limited,

(Signature and Stamp)
ANIL MANIAR





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Annexures

1. Monthly generation report issued by MSEB for the Month of November 2006
2. Debit notes raised by Ellora Times Private Limited towards DGP Hinoday Industries Limited, Pune for the months of August 2002 and March 2006
3. Invoice raised by Ellora Time Limited towards MSEB
4. MSEDCL Letter dated 28th December 2005, stating the change of meters
5. MSEDCL Letter stating that the change of meter class does not affect the generation from the turbines.
6. MERC Order dated September 2003
7. Proof of change of one of the meters in the project from class 0.5 to 0.2

