



26th August, 2020

To,

Shri Vijaybhai Rupani
Hon'ble Chief Minister
Govt. of Gujarat
Gandhinagar-10

**Sub: Request to redefine the policy of Renewable Energy for
Waste Heat Recovery System**

Respected Sir,

Greetings from Gujarat Chamber of Commerce and Industry (GCCI).

Sir, it is to bring to your kind notice that we have received a copy of representation sent to Industries Department by our member Sanghi Industries Ltd. (Membership No. 29965) dated 6th July, 2020 requesting to redefine the policy for Renewable Energy. (Copy enclosed)

Sir, it is mentioned in the letter that Waste Heat Recovery System is a proven established technology for tapping waste energy for power generation and it is useful to save energy costs per unit production by using industrial process heat for generating electricity. It is further mentioned that installing Waste Heat Power System for captive power generation can cater up to 20-40% power consumption. Since, it does not add carbon dioxide or heat in the atmosphere, hence it is not harmful to environment also and can be useful for industry at the same time.

Presently, Waste Heat Power based power plants are mainly installed in cement plants throughout the country. Estimated Waste Heat Power potential in Gujarat is about 900 MW p.a. from cement sector alone. There is a huge potential from other industrial sectors too. Gujarat being a manufacturing hub, there is huge opportunity to install power plants in other industries too.

Sir, Energy & Petrochemical Department had issued a notification dated 22.03.2016 specifying various types of energy as non-conventional or renewable source of energy. However, WHRS is not included in the notification and is therefore not classified as non-conventional or renewable source of energy.

Durgesh V. Buch
President

Natubhai Patel
Sr. Vice President

Bhargav Thakkar
Vice President

Sanjeev Chhajer
Secretary

Dilip M. Padhya
Secretary (R)

Pathik S. Patwari
Treasurer



In view of the above we request you that WHRS should be added as a renewable source of energy and the following benefits should be allowed to them, as available in other neighboring states.

- (i) Power generated from WHRS can be exempted from Renewable Purchase Obligation (RPO)
- (ii) Power generated from WHRS should be allowed to meet RPO compliance of the obligated entity
- (iii) Electricity duty on power generated through WHRS should be waived off.

We look forward to your kind intervention in the matter.

With warm regards,

Yours sincerely,

Durgesh Buch
President

Durgesh V. Buch
President

Natubhai Patel
Sr. Vice President

Bhargav Thakkar
Vice President

Sanjeev Chhajer
Secretary

Dilip M. Padhya
Secretary (R)

Pathik S. Patwari
Treasurer

Copy to:

Shri Saurabhbhai Patel, Hon'ble Minister for Energy, Govt. of Gujarat, Gandhinagar

Encl: As mentioned above

dc

Sanghi Industries Limited

Corporate Office : 10th Floor, Katana Arcade
Off S. G. Highway Post: Makarba, Dist: Ahmedabad - 380016
Tel. : 079 - 26838300 Fax : 079 - 26838111
E-mail : sanghiindia@sanghiment.com



Turning Dreams into Concrete Reality

July 6, 2020

To,
Shri M. K. Das, IAS
Principal Secretary to Chief Minister
Sawarnim Sankul - 1
Sachivalaya, Gandhinagar

Sub : Waste Heat Recovery System – Need for Policy / Redefining Renewable Energy

Dear Sir,

We wish to apprise you that Globally, the Industry Sector accounts for over one third of Net Final Energy Use out of which upto 50% is wasted in the form of Heat Losses. This energy gets generated during the industrial process and is not put to any productive use as it get wasted into Environment.

Waste Heat Recovery System (WHRS) is a process of capturing waste heat losses during the industrial process and using that heat for productive purpose such as power generation through ancillary equipments. For energy intensive industries, such as Cement, Steel, Aluminium, Sugar Mills, Fertilizers, there is great potential of generating power during the industrial process.

WHRS is a proven established technology for tapping waste energy to generate power thereby protecting environment and improving efficiency of industries. WHRS ranks high amongst energy conservation measures using process heat. Thus, WHRS leads to reduction in GHG emissions, water consumption and Ambient Air Temperature.

Globally advanced economies such as United States (US), European Union (EU) and China have recognized potential of WHRS in mitigating Climate Change and are promoting use of WHRS through suitable policy measures and financial incentives.

The Ministry of New and Renewable Energy has also working to consider WHRS Wastes Heat Power Generation as Renewal Energy Source.

Benefits of WHRS

Installation of WHRS in energy intensive industries can lead to major benefits as stated below:-

- WHRS can save energy costs per unit production by using industrial process heat for generating electricity and variety of other process applications such as preheating combustion air, generating hot water / steam in boiler etc.
- Installation of waste heat power systems for captive power generation can cater up to 20-40% of power consumption for a given industry.
- Electricity generated from waste heat power can displace power from sources that generated emission i.e. coal based thermal power plants.

CIN No. L18209TG1985PLC006531

Registered Office : P.O. Sanghinagar, Hayatnagar, Mandla, R.R. District, Telangana - 501511

Tel. : 08415 - 242240 E-mail : companysecretary@sanghiment.com

Website : www.sanghiment.com

Sanghi Industries Limited

Corporate Office : 10th Floor, Kararia Arcade,
Off S. G. Highway, Post : Makarba, Dist : Ahmedabad - 380051
Tel. : 079 - 26638000 Fax : 079 - 26638111
E-mail : sanghicmo@sanghiment.com



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- Installation Process heat is an important source of power which provides the efficient utilization of resources / fossil fuels and also reduce carbon emissions. Waste heat power plant reduces its consumer's reliance on fossil fuel based power generation. Cement Plant need power source from fossil fuel which need – **1 kg of fossil fuel** for every 1 kWh generation. There is reduction of – **1.2 kg per KWH of CO₂ emission** when power is generated using Waste Heat Gases as compared to power generated from Thermal Power Plant. WHRS is the biggest driver of CO₂ load reduction in Cement Industry across the world and is the biggest source of alternate (Green) energy.
- Generation of electricity from WHRS does not add any carbon dioxide or heat in the atmosphere. Emission / temperature levels remains almost same even with increased generation capacity of electricity without using fossil fuels.

Currently Waste Heat Power based power plants are mainly installed in cement plant throughout India. Estimated Waste Heat Power potential in Gujarat it is about 900 MW per annum from Cement Sector alone. There is huge potential from other industrial sectors viz. Iron & Steel, Glass, Aluminium, Breweries / Food Industries, caustic Soda, Petroleum Refining etc.

The Energy & Petrochemical Department, Government of Gujarat has issued a notification dated 22.03.2016 declaring some kind of energy as non conventional or renewable source of energy. Copy attached. WHRS source of energy to be included in the said notification.

We further wish to apprise that 4 (four) States viz. Rajasthan, Chhatisgarh , Madhya Pradesh and Karnataka allows WHRS to meet Renewable Purchase Obligation (RPO) compliance. 3 (Three) States viz. Andhra Pradesh, Uttar Pradesh and Maharashtra (only Vidharbha and Marathwada) allow exemption on Electricity Duty on WHRS Power.

In view of the above facts and advantages of WHRS, it is submitted that Gujarat being most industrially advanced and pro-industry State in the Country having business friendly environment, should frame the policy for power generated from WHRS to be (1) exempted from RPO Obligation (2) allowed to meet RPO Compliance of the obligated entity (3) Waiving of Electricity Duty on power generated through WHRS.

Thanking you,

Yours faithfully,
for Sanghi Industries Limited

Gaurang Bhatt
Sr. Vice President

Encl: As above

CIN No. : L18209TG1985PLC005581

Registered Office : P O Sanghinagar, Hayatnagar Mandal, R R District, Telangana - 501511
Tel. : 08415 - 242240 E-mail : companysecretary@sanghiment.com
Website : www.sanghiment.com



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Separate paging is given to this Part in order that it may be filed as a Separate Compilation.

PART IV-B

Rules and Orders (Other than those published in Part I, I-A and I-L) made
by the Government of Gujarat under the Gujarat Acts.

ENERGY & PETROCHEMICALS DEPARTMENT

Notification

Sachivalaya, Gandhinagar, 22nd March, 2016.

Bombay Electricity Duty Act, 1958.

No. GHU/2016/(31)/ELD/12-2015/3208/E : In exercise of the powers conferred by clause (v-a) of sub section (2) of section 3 of the Gujarat Electricity Duty Act, 1958, the Government of Gujarat hereby specifies the following energy as the non conventional or renewable sources of energy, namely :-

1. Solar
2. Wind
3. Biomass
4. Tidal
5. Wave
6. Geo-thermal
7. Small-hydro plant (Capacity up-to 25 MW)
8. Energy from Waste

By order and in the name of the Governor of Gujarat

SHOBHANA DESAI,
Additional Secretary to Government.