

# Resettlement Framework

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November 2021

## India: AJ Solar Power Project

Prepared by AEW India West One Private Limited with technical support from EQMS Global Pvt Ltd, Delhi, India, for the Asian Development Bank.

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## CURRENCY EQUIVALENTS

(as of November 2021)

Currency unit	–	Indian Rupee (Rs)
INR1.00	=	\$0.01343
\$1.00	=	INR 74.43

## ABBREVIATIONS

ADB	–	Asian Development Bank
AEW	–	AEW India West One Private Limited
DH	–	Displaced household
DP	–	Displaced person
EA	–	Executing Agency
GOI	–	Government of India
GRC	–	Grievance Redressal Committee
IA	–	Implementing Agency
IAY	–	Indira Awaas Yojana
LA	–	Land acquisition
L&LRO	–	Land and Land Revenue Office
RFCT inLARR Act 2013	–	The Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013
LVC	–	Land Valuation Committee
MoP	–	Ministry of Power
NGO	–	Nongovernment organization
NRRP	–	National Rehabilitation and Resettlement Policy, 2007
PD	–	Project Director
R&R	–	Resettlement and rehabilitation
RF	–	Resettlement framework
RO	–	Resettlement Officer
ROW	–	Right-of-way
RP	–	Resettlement plan
SC	–	Scheduled caste
SPS	–	Safeguard Policy Statement
ST	–	Scheduled tribe
TL	–	Transmission Line

## NOTE

- (i) In this report, "\$" refers to US dollars.

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## 1. INTRODUCTION AND PROJECT DESCRIPTION

### 1.1. Background

1. AEW India West One Private Limited (hereinafter referred as “AEW”) is developing a 80 MW solar power plant in Jhakan and Kataria Village, Limbdi Tehsil/Block of Surendranagar district Gujarat, India (hereinafter referred as the “project” or “proposed project”).
2. AEW won a project from Gujarat Urja Vikas Nigam Limited (GUVNL) of India for setting up of Grid Connected Solar PV Project in Gujrat of 80 MW capacity for supply of solar energy for 25 years. The proposed project is scheduled for commissioning in 30th July 2022.
3. AEW is seeking financing for the project from ADB and committed to comply with ADB Safeguard Policy Statement (ADB SPS, 2009), ADB Social Protection Strategy (2001), ADB Gender and Development Policy (1998) and ADB Access to Information Policy (2018).
4. AEW has negotiated a lease of 332 acres of land for setting up a solar plant. There are no encroachers or squatters on the land. However it is yet to acquire land for power evacuation transmission line of about 4-5 Km. This RF outlines the AEW guidelines and measures for acquiring land for TL.
5. **Table 1.1** and **Table 1.2** provide a snapshot of the proposed project and its implementation schedule. The location of the project is presented in **Figure 1.1**.

**Table 1.1.1: Project Overview**

Table Particulars	Description
Project Name	80 MW Solar Power Project
Project Capacity	80 MWac/120 MWp
Project Owner	AEW India West One Private Limited
Location of Site	Village: Jhakan and Kataria Village Tehsil/Block: Limbdi Surendranagar (Gujrat)
Geographical Coordinates	Latitude 22.58 °N Longitude 71.84 °E
Current Status	Grid connectivity obtained for the Project Bay allotment process completed for the Project. Land aggregator appointed Legal due diligence completed on Project land Land aggregator appointed and land procurement on lease started in Jan 2021
Nearest village Settlements	North: Village Mota Timbla South: NH 47 East: Village Katariya West: Village Bhalgamda
Site Surroundings	North: Narmada Minor Canal South: NH 47 East: Village Katariya West: Village Bhalgamda
Nearest Town Major Town	Surendranagar (35 km in West)
Nearest Railway Station	Nearest railway station District -Surendranagar (30 km in West)
Nearest Airport	Ahmadabad Airport, ~ 120km.
Nearest Sea Port	Mundra Port
Total Land Area	332 acres
Period of land Leasing	29 years 6 Months
Land holding type/ Classification of	Private agricultural land

Table Particulars	Description
land	
Type of Land use (5 km radius from site)	Agricultural land, open scrub, water body and settlement
Present status of the project/project phase	Planning phase.
<b>Power evacuation</b>	<b>Choraniya 220KV Substation. ~ 4-5 km (transmission line)</b>
Location of PSS	Within the solar plant
Mode of Implementation	EPC (Engineering, Procurement and Construction)
Project Life	29 years 6 month

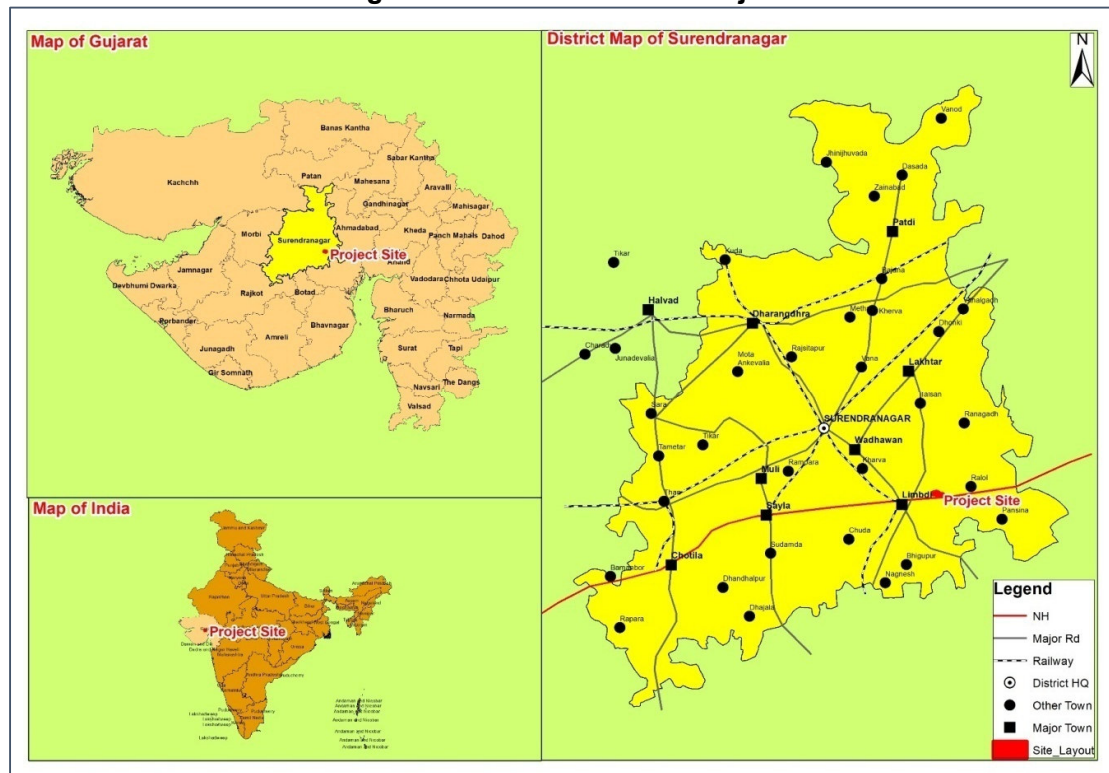
Source: AEW.

**Table 1.1.2: Implementation Schedule**

Activity Name	Start	End
Notice To Proceed	Mar-22	Mar-22
Module Ordering	Mar-22	Jun-22
Civil and Mech works	Mar-22	Sept-22
Electrical works	Mar-22	Sept-22
Pre-commissioning	Sept-22	Sept-22
Commissioning and COD	Sept-22	Oct-22

Source: AEW.

**Figure 1.1: Location of the Project**



## 1.2. Purpose and Objective of the Resettlement Framework

6. This Resettlement Framework (RF) is formulated based on (i) ADB's Safeguard Policy Statement (SPS 2009), and government laws and policies as outlined in Section II. The proposed TL acquisition shall follow the policies, procedures, and guidelines of this RF. Land for the plant as well as the TL will be obtained through lease agreement with the landowners

on a voluntary basis. While the location of the plant site is firmed up and is known, the alignment of the evacuation route and exact location of the towers and transmission line RoW are not fully known at this stage. This RF will guide the project in case of any involuntary resettlement impacts resulting from the TL. The Resettlement Plan, if IR impacts are identified, for the TL shall be prepared and endorsed by AEW and submitted to ADB for review and approval prior to start of civil works. Compensation at replacement cost and other assistances will be paid to all affected persons per their entitlement prior to commencement of construction activities. The RF will be reviewed and updated from time to time to ensure relevance and consistency with applicable country legal frameworks and ADB's Safeguard Policy Statement, 2009 (SPS).

### **1.3. Scope and Limitations of the RF**

7. The RF is guided by the agreed lease arrangements for the plant<sup>1</sup>, MoP guidelines on compensation for TL RoW, Gujarat guidelines on compensation for TL RoW, ADB Safeguard Policy Statement 2009 (SPS). The RF identifies potential impacts and provides measures to mitigate losses likely to be caused by the TL. The RF is based on the general findings of field visits, preliminary assessments, and meetings with various project-affected persons in the project areas. The RF presents the introduction and project description; legal framework; entitlement, assistance and benefit; project impacts; information disclosure, consultation and participation; grievance redress mechanisms; budget; institutional arrangements; implementation schedule; monitoring and reporting.

8. The RF has been prepared based on the preliminary route investigation/ survey. The project is categorized as 'B'<sup>2</sup> for Involuntary Resettlement (IR) and 'C' for Indigenous Peoples (IP), as per ADB's safeguard categories. The anticipated impacts are temporary in nature in terms of loss of crops in the Right of Way. Loss of trees is not foreseen. Temporary impacts are foreseen during the implementation and construction. Once actual temporary impacts are known based on the detailed design and final survey, a resettlement plan (RP) will be prepared and submitted to ADB after AEW endorsement. Subsequently, upon ADB concurrence, the construction contractor is mobilized for implementation of the TL. Exact location of tower is known only after detail survey/check survey. Check survey is done progressively during the construction of the transmission line. Normally the work is done in off season when there is no standing crop. The compensation for damage is assessed in actual after construction activities of transmission lines in three stages i.e. after completion of foundation, tower erection and conductor stringing. The payment of compensation may also be paid in three instances, if there are different damages during above three activities. RP updating will be a continuous process during construction of line for which updated semi- annual RP monitoring report shall be submitted by AEW.

### **1.4. Measures to Minimize Impact**

9. The route of the transmission line will be finalized to avoid or to minimize impacts towards temporary damages on crops/ trees/ structures if any coming in the Right of Way (RoW) during construction. Further field visits and public consultations will be held in

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<sup>1</sup> Lease Agreements are for Plant Land only. TL ROW are through Right of Way/Easement Right/Right to Use Agreements with Land owners for 29 years 6 months. Farming is allowed under the TL. Land underneath the foundations of the TL will only be impacted. The TL ROW agreements will be executed in the standard format prescribed by Government of Gujarat.

<sup>2</sup> A proposed project is classified as category B if it includes involuntary resettlement impacts that are not deemed significant which means less than 200 persons will experience major impacts, which are defined as (i) being physically displaced from housing, or (ii) losing 10% or more of their productive assets (income generating). The level of detail and comprehensiveness of the resettlement plan are commensurate with the significance of the potential impacts and risks.

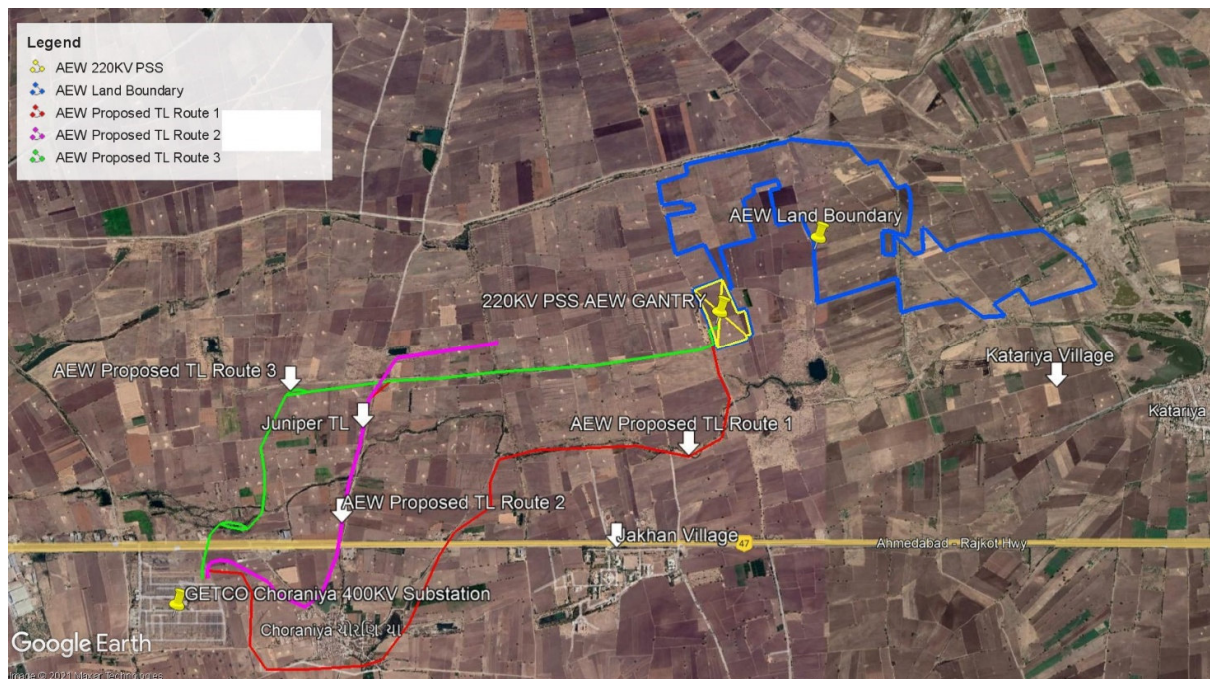
developing the measures towards minimizing negative social impacts, if any.

10. The TL route connecting the Plant side substation and grid substation is not finalized. The route will be selected keeping in mind the following factors:

- Transmission line route is planned to avoid any habitations along the route.
- No house or community structures are located under the transmission line.
- Areas requiring extensive clearing of vegetation will be avoided.
- Selection of the transmission route avoids any environmental sensitive site like schools, health centres, etc.
- Right of way/access roads will be shared with the common user of the grid substation.

11. The shortest possible route after considering the above factors will be selected for the transmission lines. Consideration of all the above factors will reduce the environmental, ecological, and social footprint of the transmission line. The following options were considered for laying Transmission line

- Option 1. AEW proposed independent TL Route 1, from 220KV PSS AEW to GETCO Choraniya 400KV Substation as shown in red colour.
- Option 2. AEW proposed TL Route 2 with existing other solar power developer, from 220KV PSS AEW till existing solar power developer independent line (green colour) and then with already constructed solar power developer line (Pink colour) to GETCO Choraniya 400KV Substation.
- Option 3. AEW proposed independent TL Route 3, from 220KV PSS AEW to GETCO Choraniya 400KV Substation as shown in Green colour.



### 1.5. Civil Works Scheduling

12. For construction of transmission line, AEW follows the law of the land and has developed a procedure which is designed to minimize impacts, during the preliminary survey/ investigation, thereafter during detailed survey (spot)/design followed by foundation work, tower erection and during the stringing of conductors.



**a) Towers foundations and footings**

13. All towers foundations and towers footings will be dug and laid, including transportation of material and land clearance, generally at the end of a crop season to avoid impacts on cultivations and need for compensation. The construction will be completed prior to LF mating season and prior to the onset of monsoon for the project area. After construction of transmission towers, farmers are allowed to continue agricultural activity below tower, where applicable.

**b) Towers erection**

14. Because the concrete needs time to dry and settle, all towers are erected normally three weeks later, after the end of the following crop season and before the following one.

**c) Stringing**

15. Given the limited time needed for the stringing, the latter can be done right after the tower construction, before the following crop season.

16. For this reason no household is expected to be significantly affected. Thus, productive loss due to construction is negligible. However, due care will be taken to avoid damages to crop/trees by taking up the construction activities during lean period or post-harvest season. As per the prevailing norms farming activity shall be allowed after the construction work is completed. All affected farmers will be compensated for all sorts of damages during construction as per the laid down procedure.

## **1.6. Route Selection**

17. Preliminary route selection is done by AEW based on the Topo sheets of Survey of India. No Forest areas are present in the project vicinity.

18. For selection of optimum route, the following points are taken into consideration:

- a) The route of the proposed transmission lines does not involve any human relocation/ rehabilitation;
- b) Any monument of cultural or historical importance is not affected by the route of the transmission line;
- c) The proposed route of transmission line does not create any threat to the survival of any community with special reference to Tribal Community;
- d) The proposed route of transmission line does not affect any public utility services like playgrounds, schools, other establishments etc.;
- e) The line route does not pass through any sanctuaries, National Park etc.;
- f) The line route does not infringe with areas of natural resources.

## **2. LEGAL FRAMEWORK**

### **2.1. Overview**

19. The RF is based on compensation for land acquisition (LA) and resettlement assistance for project affected persons/families as directed by the National law, "The Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013" (hereafter RFCT in LARR, 2013), effective from 1<sup>st</sup> January 2014. The scope of this RF being for the Transmission Line, the relevant national laws applicable for this project are (i) The Electricity Act, 2003 (ii) The Indian Telegraph Act, 1885, (iii) the MoP guidelines for compensation for RoW of TL and (iv) Gujarat order on compensation for RoW of TL. The compensation principles adopted for the project shall comply with applicable laws and

regulations of the Government of India/ State Govt.

## **2.2. ADB'S Safeguard Policy Statement (SPS), 2009**

20. ADB has adopted Safeguard Policy Statement (SPS) in 2009 including safeguard requirements for environment, involuntary resettlement and indigenous people. The objectives of the Involuntary Resettlement Safeguard policy is to avoid involuntary resettlement wherever possible; to minimize involuntary resettlement by exploring project and design alternatives; to enhance, or at least restore, the livelihoods of all displaced persons in real terms relative to pre-project levels; and to improve the standards of living of the displaced poor and other vulnerable groups.

21. The involuntary resettlement safeguards cover physical displacement (relocation, loss of residential land, or loss of shelter) and economic displacement (loss of land, assets, access to assets, income sources, or means of livelihoods) as a result of (i) involuntary acquisition of land, or (ii) involuntary restrictions on land use or on access to legally designated parks and protected areas. It covers them whether such losses and involuntary restrictions are full or partial, permanent or temporary. The three important elements of ADB's SPS (2009) are: (i) compensation at replacement cost for lost assets, livelihood, and income prior to displacement; (ii) assistance for relocation, including provision of relocation sites with appropriate facilities and services; and (iii) assistance for rehabilitation to achieve at least the same level of well-being with the project as without it. The SPS gives special attention to poor and vulnerable households to ensure their improved well-being as a result of project interventions.

## **2.3. Compensation**

22. The proposed transmission line route does not involve forest area (as such no forest within the project site vicinity and up to 5 kms). As per prevailing law, land below transmission line or for tower foundation is not acquired. AEW shall pay compensation for losses per the entitlements provided in this RF. Impacts on agriculture land are restricted mainly to the construction phase.

## **2.4. Statutory Requirements**

23. Transmission lines are constructed under the ambit of Electricity Act, 2003. The provisions stipulated in section 67-68 of the Electricity Act, 2003 read with section 10 & 16 of the Indian Telegraph Act, 1885 governs the compensation.

24. The provisions in the Electricity Act, 2003 and Indian Telegraph Act, 1885 regarding compensation for laying of transmission lines are as follows:

### **The Electricity Act, 2003, Part-VIII, Section 67 & 68**

#### **Section 67 (3-5):**

- (3) *A licensee shall, in exercise of any of the powers conferred by or under this section and the rules made thereunder, cause as little damage, detriment and inconvenience as may be, and shall make full compensation for any damage, detriment or inconvenience caused by him or by any one employed by him.*
- (4) *Where any difference or dispute [including amount of compensation under sub-section (3)] arises under this section, the matter shall be determined by the Appropriate Commission.*
- (5) *The Appropriate Commission, while determining any difference or dispute arising under this section in addition to any compensation under sub-section (3), may impose a penalty not exceeding the amount of compensation payable under that sub-section.*

**Section 68 (5 & 6):**

- (5) *Where any **tree standing or lying near an overhead line or where any structure or other object which has been placed or has fallen near an overhead line** subsequent to the placing of such line, interrupts or interferes with, or is likely to interrupt or interfere with, the conveyance or transmission of electricity or to interrupt or interfere with, the conveyance or transmission of electricity or the accessibility of any works, an Executive Magistrate or authority specified by the Appropriate Government may, on the application of the licensee, cause the tree, structure or object to be removed or otherwise dealt with as he or it thinks fit.*
- (6) *When disposing of an application under sub-section (5), an Executive Magistrate or authority specified under that sub-section shall, in the case of any tree in existence before the placing of the overhead line, **award to the person interested in the tree such compensation as he thinks reasonable, and such person may recover the same from the licensee.***

*Explanation. - For purposes of this section, the expression “tree” shall be deemed to include any shrub, hedge, jungle growth or other plant.*

**The Indian Telegraph Act, 1885, Part-III, Section 10 :**

**Section 10** – *The telegraph authority may, from time to time, place and maintain a telegraph line under, over, along, or across, and posts in or upon any immovable property, Provided that*

- a) *the telegraph authority shall not exercise the powers conferred by this section except for the purposes of a telegraph established or maintained by the [Central Government], or to be so established or maintained;*
- b) ***the [Central Government] shall not acquire any right other than that of user only** in the property under, over, along, across in or upon which the telegraph authority places any telegraph line or post; and*
- c) *except as hereinafter provided, the telegraph authority shall not exercise those powers in respect of any property vested in or under the control or management of any local authority, without the permission of that authority; and*
- d) *in the exercise of the powers conferred by this section, the telegraph **authority shall do as little damage as possible, and, when it has exercised those powers in respect of any property other than that referred to in clause (c), shall pay full compensation to all persons interested for any damage sustained by them by reason of the exercise of those powers.***

**Section 16 of the Indian Telegraph Act, 1885 which stipulates as under:**

**16. Exercise of powers conferred by section 10, and disputes as to compensation, in case of property other than that of a local authority:**

- (1) *If the exercise of the powers mentioned in Section 10 in respect of property referred to in clause (d) of that section is resisted or obstructed, the District Magistrate may, in his discretion, order that the telegraph authority shall be permitted to exercise them.*
- (2) *If, after the making of an order under sub section (1), any person resists the exercise of those powers, or, having control over the property, does not give all facilities for this being exercised, he shall be deemed to have committed an offence under section 188 of the Indian Penal Code (45 of 1860).*

25. Ministry of Power (MoP) vide its order No. 3/7/2015-Trans dated 15th April'15 constituted a Committee comprising of representatives of various State Govt., MoP, Central Electricity Authority (CEA) & POWERGRID under the chairmanship of Special Secretary, MoP to analyze the issues relating to Right of Way for laying of transmission lines in the country and to suggest a uniform methodology for payment of compensation on this account. Based on recommendation of the Committee, Ministry of Power, Govt. of India vide its notification dated 15th Oct'15 has issued guidelines for payment of compensation for damages in regard

to RoW (Annexure-1). The said guideline was adopted by Govt. of Gujarat vide order dated 23.06.16 for implementation (Annexure-2). AEW is proposing to make the land available through lease arrangements. However, in case the TL RoW and area for tower base shall be taken duly following MoP guidance, AEW shall pay compensation towards diminution of land value to all affected farmers/landowners. Thus, following compensation shall be paid in addition to normal tree and crop damage compensation:

- i) **Tower base:** Compensation @ 85% of land value as determined by District Magistrate (DM) or any other authority based on Circle rate/ Guideline value/ Stamp Act for tower base area (between four legs).
- ii) **Line corridor:** Diminution of land value in the RoW would be decided by States as per categorization/type of land in different places of State subject to maximum of 15% of land value as determined based on Circle rate/ Guideline value/ Stamp Act.

## 2.5. Basic Principles for the Project

26. The basic principles adopted for the Project are:

- (i) Avoid negative impacts of land acquisition and involuntary resettlement on persons affected by the Project to the extent possible.
- (ii) Where negative impacts cannot be avoided, assist affected persons (AP), in improving or at least regaining their standard of living and income.
- (iii) Carry out meaningful consultations with affected persons and inform all displaced persons of their entitlements and resettlement options. Ensure their participation in planning, implementation and monitoring of the Project
- (iv) Disclose all information related to, and ensure AP participation in, resettlement planning and implementation.
- (v) Provide compensation for acquired assets at replacement/market value in accordance with the RF/RP.
- (vi) Ensure that displaced persons without titles to land or any recognizable legal rights to land are eligible for resettlement assistance and compensation for loss of non-land assets.
- (vii) Provide resettlement assistance and income restoration to APs.
- (viii) Provide for APs not present during enumeration. However, anyone moving into the project area after will not be entitled to assistance.
- (ix) Develop procedures in a transparent, consistent, and equitable manner if land acquisition is through negotiated settlement to ensure that those people who enter into negotiated settlements will maintain the same or better income and livelihood status.
- (x) Provide compensation and resettlement assistance prior to taking possession of the acquired lands and properties.
- (xi) Establish grievance redress mechanisms to ensure speedy resolution of disputes.
- (xii) Ensure adequate budgetary support to cover implementation costs for RP.
- (xiii) Monitoring (if required) of the implementation of RP.

27. Additionally, the issues related to the Right of Way (RoW) for the transmission lines will be dealt with proper care especially for the temporary loss. For the loss of crops and trees due to construction of overhead lines, lease amount/ cash compensation payable by cheque/through online transfer will be provided during construction works. Further, cash compensation (by cheque/ online transfer) to the APs for the temporary loss of crop and loss of trees if occurred, during the time of maintenance and repair will be paid.

## 2.6. Cut-off- Date

28. The impacts are temporary in nature in terms of loss of crops etc., which will occur

during the construction. The lease amount/ compensation will be paid parallel with construction activities of transmission lines as per assessment of actual damage. A prior notice is served after the detailed/check survey and finalization of tower location during the construction to the land owners informing that the proposed transmission line is being routed through the property of the individual. The notice shall contain the particulars of the land, ownership details and the details of the trees/crops inevitability to be damaged during the course of the construction of the proposed transmission line. This serves as a record for identifying the actual APs and the date of issuance of this notice can be treated as cut-off-date for identification and assessment of damages.

### **3. SOCIO-ECONOMIC INFORMATION**

#### **3.1. Methodology**

29. Socio-economic data shall be collected, which is used as the basis for identifying, predicting, and assessing impacts during the project preparation and implementation, mainly during land acquisition and prior to commencement of civil works. Based on the project footprint area of 332 acres for the plant in two villages, primary and secondary data shall be collected. The TL will passthrough a narrow corridor and is not expected to impact existing land ownership, landuse or access to landuse. The affected persons shall be identified through the land records and ascertained by interactions with village officials, community and individuals. Historical details about the site shall be collected through secondary sources that include District Census, and other information available on websites, books, and journals. Primary data shall be collected through a structured questionnaire survey on standards of living, inventory of assets, sources of income, employment, level of indebtedness, housing characteristics, profile of household members, health and sanitation, access to services and facilities etc, leading to quantitative and qualitative data. Surveys, FGDs, interviews, and consultation sessions shall be held to obtain project data related to affected area, persons, livelihoods. Different types of groups shall be included in the primary data collection process that include - potential PAPs, officials, local leaders, agriculture workers including women workers. The collected data shall be analysed using statistical, narrative and descriptive techniques. This information along with the census survey data would facilitate the preparation of a resettlement plan to mitigate adverse impact(s). During the socio-economic survey, wide range of consultations with different impacted groups and other stakeholders shall be conducted to ascertain their views and expectations. Consultations shall focus on women, vulnerable section and their concerns to the project.

30. This gender disaggregated data establishes baseline socio economic characteristics which together with results/ outcomes of consultations will become the basis for carrying out design changes and preparing RP to mitigate the impacts and measuring impacts once the RP is implemented.

#### **3.2. Replacement Cost**

31. Valuation and determination of replacement cost: Private land in the project impacted area is predominantly used for agriculture. Large portion of the land remains dry in most part of the year. Land leasing will not result in any physical displacement, the land sourced for developing the project is unirrigated rainfed agriculture land. The agriculture is not extensively cultivated due to lack of irrigation. And as reported by during the consultation with the landowners, average earning of a good season from their land parcel leased for project was INR. 8000-12,000 /acre /annum. And by leasing the land to the project the landowners were able to make assured income through yearly lease rental of INR. 33,500/Acre/Annum for 29 years & 6 Months with 5% escalation for every three years. The agriculture workers reported to have reduced agriculture activities due to the development of solar project are not primarily dependent on the piece of project site land. Moreover, the project will generate number of

direct and indirect employment opportunities in the neighboring villages both during construction and operation phase, the work includes various construction works during the construction phase and during operation phase like grass cutting, module cleaning, panel tilting works, deployment of security staffs etc.

32. The assured lease rental to the landowners, trainings and capacity building measures leading to increased livelihood opportunities are assessed to be meeting the replacement cost provisions of SR2. The measures shall be further strengthened based on monitoring results, during the RP implementation.

33. With respect to proposed transmission line, Right of way and payment of compensation will be decided following due criteria as per the Guidelines issued by Ministry of Power on Right of Way for Transmission lines dated 15<sup>th</sup> Oct 2015. Transmission towers are proposed to be erected on the private land through negotiation on voluntary basis and as such no replacement cost provisions are applicable.

#### 4. ENTITLEMENTS, ASSISTANCE AND BENEFITS

##### 4.1. Entitlements

34. The land will be made available for the plant and for TL through lease arrangements and an amount of INR 33500 per acre per annum with a 5% increase every 3 years will be paid as lease amount. For TL, one time compensation for temporary damages shall be paid as per existing rates as mutually agreed with landowners and applicable laws.

35. APs will be entitled for compensation for temporary damages to crops/trees/structures etc. as per the Entitlement Matrix given in **Table 4.1**. The Land Acquisition Act (LAA) will be applicable for the compulsory acquisition of land. They will also receive 'rehabilitation assistance' if their land is permanently acquired, their income source is adversely affected, their homes are fully or partially affected, or other properties such as commercial structures or agricultural structures, crops, trees, and other facilities or access to properties are damaged or reduced because of the Project. In the instant case, there is no involuntary land acquisition involved, only temporary damage will occur during construction of transmission line for which compensation is paid as per relevant norms. Compensation towards temporary damages to all eligible APs is paid as per the assessment and Entitlement Matrix.

36. All APs are paid compensation for actual damages or losses irrespective of their religion, caste and their economic status. As an additional assistance, construction contractors are encouraged to hire local labour that has the necessary skills. One-time lump sum assistance to vulnerable households on recommendation of State Authority, if displaced and losing land will be offered.

37. No physical displacement is envisaged in the proposed project. Major damages in transmission line are not envisaged due to flexibility of routing of transmission line. Transmission line construction is done mainly in the lean period to reduce damages to crops. Displacement of structures is normally not envisaged in the transmission line projects. However, whenever it is necessary, compensation for structures as per entitlement matrix of RF shall be provided (**Table 4.1**). In the instant case, no structures likely to be encountered in the right of way of proposed transmission line. In case of any structure identified prior to implementation, a notice for damage is issued to APs and the joint measurement by AEW and APs is to be done and verified by revenue official for actual damages. Compensation is paid in parallel with the construction activity of transmission line.

## 4.2. Entitlement Matrix

38. An Entitlement Matrix for the project is given in **Table 4.1**.

**Table 4.1: Entitlement Matrix**

S.N	TYPE OF ISSUE/ IMPACT	BENEFICIARY	ENTITLEMENT OPTIONS
1.	Loss of crops and trees	Title Holder/	Compensation at market rate for crops and for fruit bearing trees. APs will be given advance notice to harvest their crops. Timber will be retained by the owner.
2.	Loss of crops and trees	Non-titleholder: Tenant/ sharecropper/ leaseholder	If the tenant/sharecropper/leaseholder is also the cultivator, will get compensation at market rate for crops or fruit bearing trees. APs will be given advance notice to harvest their crops.
3.	Loss of structure		
	a) House		
	Loss /Removal of House	Titleholders/ Non-titleholders	Cash compensation at replacement cost (without deduction for salvaged material) plus Rs. 25,000/- assistance (based on prevailing GOI norms for weaker section housing) for construction of house plus transition benefits as per category-5 below
	b) Shop/ Institutions		
	Loss /Removal of Shop	Titleholders/ Non-titleholders	Cash compensation plus Rs. 10,000/- for construction of working shed/shop plus rehabilitation assistance equivalent to 1 year income plus transition benefits as per category-5 below
4.	Losses during transition of displaced persons/ establishments/ Shifting / Transport	Family/unit	Provision of transport or equivalent cash for shifting of materials and/or livestock from existing place to alternate place
5.	Impacts on vulnerable APs	Vulnerable APs	One-time lumpsum cash assistance to vulnerable households on recommendation of State Authority. This will be paid over and above other assistance. Vulnerable APs to get priority under CSR activities.
6.	Land area below tower base	Owner	85% of land cost as decided by District Magistrate (#). The land will be leased for the life of the Project through Right to Use Agreement by payment of one-time compensation.
7.	Land coming in corridor of width of Right of Way	Owner	15% of land cost as decided by District Magistrate (#)
8.	Other damages including diminution of land value or lost assets or other improvements (if applicable)	All APs	Replacement cost as assessed by the concerned authority.

(#): As per MoP guidelines dated 15.10.15 and subsequent order issued by Govt of Gujarat on 23.06.16 regarding payment of compensation for damages in respect to RoW for transmission line

## 5. INFORMATION DISCLOSURE, CONSULTATION, AND PARTICIPATION

### 5.1. Consultations and Community Participation during Project Implementation

39. The process of consultation is to be continued during project implementation and even during O&M stage. The progress and proposed plan for Public consultation is described in **Table 5.1**;

**Table 5.1: Plan for Future Consultations**

S. No	Activity	Technique	Schedule
1.	<b>Detailed/ Check survey</b>	Formal/Informal Meeting at different places - en- route final route alignment of line	Public meeting during Dec 2021 to Dec 2022
2.	<b>Construction Phase</b>	Localized group meeting, Pamphlet/Information brochures, Public display etc.	During entire construction period.
3.	<b>O&amp;M Phase</b>	Information brochures, Operating field offices, Response to public enquiries, Press release etc.	Continuous process as and when required.

### 5.2. Information Disclosure

40. The draft/summary RF and RP will be disclosed by the AEW to the affected households and other stakeholders by placing it on website of AEW. In addition, hardcopies of the report in English and Gujarati, will be made available at site and village offices. A notice is also issued to APs after the detailed/ check survey and finalization of tower location during the construction. Affected persons also visit site/construction offices of AEW to know about the compensation norms and policies and to discuss their grievances. The executive summary of the RP and Entitlement Matrix will also be made available to public through AEW's construction offices in Gujarati & English. The collection of comments will take place after two weeks of the disclosure of the RP, followed by the compilation of the comments and responses received. Subsequently, the AEW will organize further public consultation meetings with the stakeholders to share the views of public on the Plan for all possible clarifications. The feedback from the consultation will be reviewed and incorporated in the revised and final RP. The consultation process will continue throughout the project implementation period. AEW will disclose revisions of the RP and updates if any, on its website and provide relevant information of monitoring reports to affected people and other stakeholders. This is to be done in a timely manner and in English and Gujarati.

## 6. GRIEVANCE REDRESS MECHANISM

41. A project-specific grievance redress mechanism (GRM) will be established to receive, evaluate and facilitate the resolution of affected people's concerns, complaints and grievances related to social performance of the project, more specifically related to compensations (lease amounts), IR entitlements and livelihood support activities – if applicable. Grievance redressal is inbuilt in lease payment or crop/tree compensation process (where applicable) as affected persons are given the opportunity to express their grievances concerning assessment of damages. The GRM will aim to provide a time-bound and transparent mechanism to voice and resolve social concerns linked to the project. The project-specific GRM is proportional to the risks and impacts of the project and as such, is not intended to bypass the government's own redress process, rather it is intended to address affected people's concerns and complaints promptly, making it readily accessible to all segments of the affected people. The GRM does not impede access to the country's judicial or administrative remedies. The GRC will continue to function, for the benefit of the affected persons, during the entire life of the project including the maintenance period.



42. Steps for grievance redress are as follows:

**Step 1: Filing of grievance** - Grievances, including those filed anonymously can be submitted to the Project through the following channels:

- Grievance boxes located in the village office and at the project site office
- Via telephone hotline
- Via text messages
- Directly to any member of the GRC

**Step 2: Recording of grievances** - All grievances received will be recorded immediately in the project grievance register. Grievances related to the project but submitted directly to the village office will also be considered and captured into the project grievance register. Grievance boxes will be checked weekly by members of the GRC and there will be weekly coordination with the village head to see if there are any complaints regarding the project. Grievances received via phone and those directly received by GRC members will be immediately recorded.

**Step 3: Acknowledgement of the grievance** – Within three working days upon receipt of the grievance, the GRC will contact the grievance sender to acknowledge receipt of the grievance and provide information on the proposed steps to resolve the grievance, including timelines.

**Step 4: Consultation and investigation** - The GRC will conduct consultation and investigation activities to determine the merits and extent of the grievance and will be completed within 30 days upon receipt of the grievance. The grievance sender will be interviewed to get additional information about the complaint. The GRC will conduct ocular inspections and interview relevant stakeholders. If needed, coordination with village officials will be done to facilitate resolution of the grievance. Available documents necessary for the investigation will also be reviewed. All information gathered will be properly documented.

**Step 5: Resolution and feedback** - All efforts shall be made to provide redress on the complaints within 45 days from receipt of the grievance. The GRC will work closely with the grievance sender to reach an agreement on a mutually acceptable solution. Where mediation is desired, local institutions will be requested to mediate between the project and grievance sender and other concerned stakeholders. Agreed resolution will be provided in writing to the grievance sender within the prescribed duration. For anonymous grievances, responses will be posted at the project site bulletin board and at the village office.

**Step 6: Appeal or Elevation of Grievance** - In case complainant/appellant is not satisfied with the decision of project level GRC they can make an appeal to corporate GRC for review. The outcome of the GRC process is binding, unless vacated by the court of law.

**Step 7: Follow-up Activities** – Monitoring activities based on the agreed resolution will be conducted to ensure that all committed actions are carried out, and that no remaining issues are unsettled. Grievance senders will be asked for their feedback on the resolution upon completion of agreed actions.

**Step 8: Documentation and reporting** – All actions taken and agreed upon resolution will be recorded in the grievance register. This will include observations and actions during follow-up activities. The GRC will be responsible for preparing regular reports to be submitted to the corporate level and to ADB. The report will include the resolution and closure process.

## Process Flow



43. Implementation arrangements at the site level – The GRC will be composed of the Construction Manager, Site Admin Manager, and the E&S Expert at the site. The Construction Manager will head the GRC. Meanwhile, the E&S Expert will be in-charge of the grievance register, conduct monitoring activities, and prepare grievance reports.

44. Information dissemination - During project preparation, information regarding the formation and functioning of project level GRC will be disclosed as part of the public consultation process. Villagers will be provided with handouts with key information on the GRM, including hotline numbers that they can access. GRM posters with contact numbers will be put in prominent places such as village halls, construction site and other places where stakeholders gather.

## 7. BUDGET

45. This RF is for the 4-5 km transmission line RoW and the Implementation cost estimate includes eligible compensation as per RoW agreements for making available the RoW. As such no transfer of title takes place and the asset ownership remains with the original owner. However, to guide preparation of budgets for RP, the following provisions of this RF are to be

followed: Budgets shall cover costs only for loss of crops, trees, huts and support cost for implementation of RP, monitoring, other administrative cost etc. A budget provision shall be made for compensation for Tower Base (85% of the land cost) and RoW Corridor (15% of the land cost) as per MoP guidelines and State Govt. order. Accordingly the cost shall be estimated in the budget by including these provisions. However, this is a tentative budget which may change during the original course of implementation. The unit cost for the loss of crop shall be derived through rapid field appraisal and based on AEW's experience of similar project implementation. Contingency provision equivalent to 1% of the total cost shall be made to accommodate any variations from this estimate. Sufficient Budget shall be provided to cover all compensation towards crops losses, other damages etc., Structures will be avoided to the extent possible. However, if any structure is affected, budget provisions shall be made available to cover all damages as per entitlement matrix. In any case no residential structure shall be affected. Therefore, provisions of budget expenditure for implementation of RP for the TL considering corridor of 4-5 km maximum with a width of 6 m shall be made. Actual updating of the estimated cost shall be made during execution.

## **8. INSTITUTIONAL ARRANGEMENTS**

46. The institutional framework and the roles and responsibilities of various institutions to be involved in the R&R activities of the project and implementation of RP are described below.

47. AEW together with its Consultants is responsible for the overall execution of the project. The PD of AEW will be responsible for ensuring preparation of RP in accordance with this RF and smooth implementation of RP, including coordination with relevant stakeholders, making available required budgets, appointment and facilitating services of specialists for undertaking RP activities.

48. The AEW and Its Consultants will maintain all databases and work closely with Affected persons /PAPs and other stakeholders.

49. The following staff with are responsible for RF implementation: The organization structure is also presented as Annexure – 3.

- At AEW Head Office –
  - Project In-Charge (Head – Renewable Energy) responsible for allocation of resources, SPOC for ADB, Head of Grievance Panel for the project, compensation payments
  - Project HR (Manager Accounts): ensure availability of requisite personal, arrange E&S training and awareness program, participate in GRM
  - Project Technical Design In-charge (Director - Technical): ensure adoption of EMP measures related to design in project design and procurement, inclusion of Environmental and social measures as per ESIA, LRP, RP in the contract and ensure its implementation, participate in GRM, reporting to ADB
  - Technical E&S advisory and management team from - EQMS Global Pvt Ltd: ensure compliance of EMP and Social management plan at site, help in periodic E&S reporting to ABD, Participate in GRM,
- At Site –
  - Project & Contract Manager at site (Construction Manager): Ensure compliance to Environment and social management requirement by every vendor at site as per ESIA, RF, LRP, and other committed documents, resolve Grievances and forward unresolved grievances at Site level to Head office and manage the engagement of the E&S Expert. Ensure effective implementation for EHS requirements by contractors, participate in GRM

- Administration Manager at site (Site Admin Manager): Reporting to the Construction Manager, ensure compliance to ESIA, RF, LRP requirements - including coordinating with affected persons for conduct of trainings, awareness sessions, assist in post training support in LRP measures, in coordination with the E&S Expert.
- E&S Expert at site (Third Party Outsource Agency – EQMS Global Pvt Ltd): Reporting to the Construction Manager, regular surveillance and ensure implementation of E&S requirements (including health and safety) at site as per ESIA, LRP, RF. Undertake assessment as per RF, LRP for transmission line, prepare periodic compliance report, participate in missions, receive, analyze grievance and help resolve. They will also ensure the following:
  - conduct of community consultations
  - review of land transaction activities
  - compensation to affected persons
  - monitoring and reporting

50. The team will undergo an orientation and training in IR, livelihoods management at the beginning of the project. The capacity development training inputs would include ADB resettlement policy and principles. The training activities will focus on issues concerning - principles and procedures of land acquisition; public consultation and participation; entitlements and compensation disbursement mechanisms; grievance redressal; and monitoring of resettlement operation. The training would specifically focus on the differences between provisions of ADB policy and the relevant country laws. The awareness of these differences and the need to follow the provisions of the ADB policy are critical for successful implementation of the RP.

## **9. IMPLEMENTATION SCHEDULE**

51. The project implementation will consist of the three major phases, namely project preparation, land acquisition, and rehabilitation of Affected persons. In line with the principles laid down in this RF, AEW will ensure that project activities are synchronized between the resettlement plan implementation activities as well as the project implementation. The AEW will ensure that – (i) land/ RoW possession is taken up only after signing of firm Lease Agreements as per agreed terms, and (ii) If any IR impacts are triggered for TL, construction at Transmission line is taken up only after approval of RP for TL by ADB. Also, in this scenario, AEW will ensure that there shall be no physical or economic displacement of displaced households will occur until: (i) compensation at full replacement cost has been paid to each displaced person for project components or sections that are ready to be constructed; (ii) other entitlements listed in the resettlement plan are provided to the displaced persons; and (iii) a comprehensive income and livelihood rehabilitation program, supported by adequate budget, is in place to help displaced persons, improve, or at least restore, their incomes and livelihoods. Furthermore, all RPs will be revised during detailed design, and the updated RPs will be approved by ADB and disclosed prior to implementation. This process for TL will be completed within three months period.

## **10. MONITORING AND REPORTING**

52. Monitoring will be the responsibility of AEW and EQMS Global Pvt Limited (qualified EHS&S Consultants, engaged by AEW). AEW will disclose semi-annual monitoring reports on their safeguards implementation performance on AEW's website and submit the reports to ADB for information and disclosure.

53. Internal monitoring of AEW will include: (i) administrative monitoring: daily planning, implementation, feedback and troubleshooting, and progress reports; (ii) socio-economic

monitoring: payment of lease amounts annually, compensation of crops/trees or any other damages, demolition if any, salvaging materials, dates for consultations, and number of appeals placed; and (iii) post- implementation monitoring of the APs. Semi-annual monitoring reports documenting progress on implementation of RP and grievance redressal will be provided by AEW to ADB.

54. Since project is unlikely to have significant adverse impacts, no external monitoring is proposed.

## ANNEXURE – 1: MOP GUIDELINES FOR PAYMENT OF COMPENSATION FOR TRANSMISSION LINE

No.3/7/2015-Trans  
Government of India  
Ministry of Power  
Shram Shakti Bhawan  
Rafi Marg, New Delhi – 110001

Dated, 15<sup>th</sup> October, 2015

To

1. Chief Secretaries/Administrators of all the States/UTs  
(As per list attached)
2. Chairperson, CEA, New Delhi with the request to disseminate the above guidelines to all the stakeholders.
3. CMD, PGCIL, Gurgaon.
4. CEO, POSOCO, New Delhi.
5. Secretary, CERC, New Delhi.
6. CMD of State Power Utilities/SEBs

Subject: Guidelines for payment of compensation towards damages in regard to Right of Way for transmission lines.

During the Power Ministers Conference held on April 9-10, 2015 at Guwahati with States/UTs, it has, *inter alia*, been decided to constitute a Committee under the chairmanship of Special Secretary, Ministry of Power to analyse the issues related to Right of Way for laying of transmission lines in the country and to suggest a uniform methodology for payment of compensation on this count. Subsequently, this Ministry had constituted a Committee with representatives from various State Governments and others. The Committee held several meetings to obtain the views of State Governments on the issue and submitted its Report along with the recommendations (copy of the Report is at **Annex-1**).

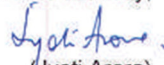
2. The Recommendations made by the Committee are hereby formulated in the form of following guidelines for determining the compensation towards "damages" as stipulated in section 67 and 68 of the Electricity Act, 2003 read with Section 10 and 16 of Indian Telegraph Act, 1885 which will be in addition to the compensation towards normal crop and tree damages. This amount will be payable only for transmission lines supported by a tower base of 66 KV and above, and not for sub-transmission and distribution lines below 66 KV:-

- (i) Compensation @ 85% of land value as determined by District Magistrate or any other authority based on Circle rate/ Guideline value/ Stamp Act rates for tower base area (between four legs) impacted severely due to installation of tower/pylon structure;

-/-

- (ii) Compensation towards diminution of land value in the width of Right of Way (RoW) Corridor due to laying of transmission line and imposing certain restriction would be decided by the States as per categorization/type of land in different places of States, subject to a maximum of 15% of land value as determined based on Circle rate/ Guideline value/ Stamp Act rates;
  - (iii) In areas where land owner/owners have been offered/ accepted alternate mode of compensation by concerned corporation/ Municipality under Transfer Development Rights (TDR) policy of State, the licensee /Utility shall deposit compensation amount as per (i) & (ii) above with the concerned Corporation/ Municipality/ Local Body or the State Government.
  - (iv) For this purpose, the width of RoW corridor shall not be more than that prescribed in the table at **Annex-2** and shall not be less than the width directly below the conductors.
3. Necessary action may kindly be taken accordingly. These guidelines may not only facilitate an early resolution of RoW issues and also facilitate completion of the vital transmission lines through active support of State/ UT administration.
4. All the States/UTs etc. are requested to take suitable decision regarding adoption of the guidelines considering that acquisition of land is a State subject.

Yours faithfully,

  
(Jyoti Arora)  
Joint Secretary (Trans.)  
Tele: 011-2371 0389

Copy, along with enclosure, forwarded to the following:

- 1. Secretaries of Government of India (Infrastructure Ministries/Deptt including MoEF - As per attached list)
- 2. Prime Minister's Office (Kind Attn: Shri Nripendra Mishra, Principal Secretary to PM).
- 3. Technical Director, NIC, Ministry of Power with the request to host on the website of Ministry of Power.

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Copy to PS to Hon'ble MoSP (IC) / Secretary (Power) / AS (BNS) / AS (BPP) / All Joint Secretaries/EA/ All Directors/DSs, Ministry of Power.

**ANNEXURE – 2: GOVT OF GUJURAT ORDER DATED 23.06.16 FOR PAYMENT OF  
COMPENSATION FOR TRANSMISSIONLINE**

→ Original Orders

પત્ર નં.: પર-૨૧૬-૯૧૩-૪

મહેસૂલ વિભાગ,

સચિવાલય, ગાંધીનગર

તા. ૨૩ જુન ૨૦૧૬

પ્રતિ,  
સર્વે,  
કલેક્ટરશ્રી,

(વિષય:- ટ્રાન્સમીશન લાઇન ના નિર્માણ કાર્યની કાર્યવાહી સમયે  
વળતર નકકી કરવા બાબત.)

શ્રીમાન,

ઉપરોક્ત વિષય પરત્વે તા.૧૫/૧૦/૨૦૧૫ ના કેન્દ્રીય ઉર્જા મંત્રાલય, ભારત સરકારના  
કસવ નં.૩૪/૨૦૧૫-ટ્રાન્સ ની નકલ આ સાથે આપેલ રાખેલ છે. જેની વિગતે તા.૦૯-  
૧૦/૦૪/૨૦૧૫ ના રોજ કેન્દ્રીય ઉર્જા મંત્રાલય, ભારત સરકાર દ્વારા ડેબીટેડ પાવર ડિસ્ક્રિપ્શન  
ચોક્કસ, જે અન્વયે થયેલ કસવ મુજબ વીજ લાઇનના નિર્માણ સમયે વળતર બાબતે નિર્ણય  
લેવામાં આવેલ તથા તે ધર્મે ચોક્કસ ગાઠડ લાઇન તૈયાર કરી દેશના તમામ સ્થળોમાં આ ગાઠડ  
લાઇન મુજબ ખેડૂતોને કે જમીન માલીકોને વળતર ચુકવવા બાબત. કરવા કરેલ છે. જે ધ્યાને લઈ  
આપની કક્ષાએથી નિયમાનુસારની કાર્યવાહી હાથ ધરવા વિનંતી છે.

૨૫/૬/૨૦૧૬  
૧૫/૬/૨૦૧૬  
૧૫/૬/૨૦૧૬

આપનો વિશ્વાસ

(કે.ડી.ઉદાપાયા)

નાયબ સચિવ

મહેસૂલ વિભાગ, ગુજરાત સરકાર

Copy To:- General Manager (Projects-II),  
WR-II, Vadodra.

— For kind information Please.

૨૫/૬/૨૦૧૬  
૨૫/૬/૨૦૧૬  
૨૫/૬/૨૦૧૬



## → Translation of Gujarati Orders

LETTER NO.PRCH-216-9-13-GH  
Revenue Department  
SACHIVALAYA, GANDHINAGAR

DATED 23<sup>rd</sup> June 2016

To,  
The all Collectors of Gujarat State.

SUB : GUIDELINES FOR COMPENSATION TO BE PAID DURING THE CONSTRUCTION OF TRANSMISSION LINE

Sir,

With reference to the subject matter in line with **Resolution No.3/7/2015** dated **15/10/2015** (copy enclosed) issued by **Ministry of Power, Government of India**. Cabinet Power Conference was held on 10/04/2015 by Ministry of Power, Government of India, the Resolution / guideline has prepared and decided to implement in each states of this Country. According to this guidelines, the compensation shall pay to the concerned farmers / land owners at the time of construction of Transmission Lines. It is to be noted and further necessary action may be taken at your end, please.

Yours faithfully,

S/d ✓  
(K.D. UPADHYAY)  
Dy. Secretary,  
(Govt. of Gujarat)

### ANNEXURE – 3: Organization Structure

