

Brief of the Petition for Grant of Distribution License

(Submitted by Eleven Power Private Limited)

Submitted to: Haryana Electricity Regulatory Commission (HERC)
Proposed License Area: Gurugram and Nuh Revenue Districts, Haryana
Petitioner: Eleven Power Private Limited
Key Legislation: Sections 14 & 15, Electricity Act, 2003

1. Context

Eleven Power Private Limited (hereinafter "Eleven Power") has filed a petition before the Hon'ble Haryana Electricity Regulatory Commission (HERC) seeking the grant of a parallel Distribution License for the revenue districts of Nuh and Gurugram in the State of Haryana. The application is governed by Sections 14 and 15 of the Electricity Act, 2003, read in conjunction with the HERC (Transmission and Distribution Licensing) Regulations, 2004, and the Distribution of Electricity License (Additional Requirements of Capital Adequacy, Creditworthiness, and Code of Conduct) Rules, 2005, as amended in November 2022.

The Petition was heard on 26 May 2026, and the Hon'ble Commission directed Eleven Power to issue a Public Notice in compliance with Section 15(5) of the Electricity Act, 2003.

The overarching objective of Eleven Power is to introduce a modern, technology-driven, and renewable-energy-centric electricity distribution utility. Recognizing the rapid industrial and commercial growth, multifold rural load increase, and urban expansion in Gurugram, Manesar, Sohna, and Nuh, the Petitioner aims to meet growing demand by providing reliable, uninterrupted, and green power. These regions are currently served by a single State Utility, Dakshin Haryana Bijli Vitran Nigam (DHBVN). By introducing competition through a parallel license, Eleven Power aims to enhance the quality of supply, improve consumer service efficiency and responsiveness, optimize grievance redressal, strengthen distribution infrastructure, and facilitate the substantial integration of renewable energy.

2. Background of the Petitioner and Promoter Group

Eleven Power Private Limited was incorporated in 2025, with 99.99% of its equity share capital held by S A S Fininvest LLP. Eleven Power is part of the Eleven Group, a diversified Indian business conglomerate with extensive interests spanning financial services, healthcare, technology, and clean energy.

Mr. Sunil Sachdeva, Director of Eleven Power Private Limited and Chairman of Eleven Group, is a seasoned entrepreneur with over 40 years of experience across the power, healthcare, financial services, technology, and infrastructure sectors. He began his career in the power sector, leading the execution and commissioning of more than 100 substations. He also co-founded Medanta, one of India's leading multi-super specialty hospital chains, and SVCL, a financial services company serving over 19 lakh customers across 10 states. He has been recognized among the "Top 200 Self-Made Entrepreneurs of the Millennium" by IDFC (2026) and as "India's Most Respected Entrepreneur – Healthcare" by Hurun India (2024).

3. Strategic Consortium Partnerships

To ensure robust technical execution and maintain grid reliability, Eleven Power has allied with three experienced infrastructure partners. Each member of this strategic consortium brings specialized competencies covering the entire spectrum of distribution needs.

A. Vision India Services (VIS)

Vision India Services (VIS) assumes the role of the operational and retail distribution partner. Certified under ISO 9001:2015 and ISO 45001:2018, VIS manages complex urban grids and consumer interfacing.

- **Commercial Operations:** VIS provides end-to-end services in meter reading, bill distribution, door-to-door revenue collection, and comprehensive meter management, including installations, shifting, and replacements.
- **Proven Track Record:** VIS has executed turnkey meter installations and revenue operations for major Tata Power joint ventures in Odisha (TPCODL, TPNODL, etc.) and for State Utilities in Haryana, including UHBVN and DHBVN.

B. HEC Infra Projects Limited (HEC Infra)

HEC Infra Projects Limited (HEC Infra) provides the critical technical engineering required for the high-voltage backbone and advanced grid architecture.

- **Substation Mastery:** HEC Infra executes large-scale projects up to 220kV, including the 220kV Kawant AIS for GETCO and renewable evacuation substations for Juniper Green Energy.
- **Underground & Overhead Transmission:** HEC Infra has expertise in laying Extra High Voltage (EHV) underground cables, which are crucial for densely populated urban zones. The company holds an annual rate contract with GETCO for laying over 40 km of 66kV cable.
- **Smart Technologies:** HEC Infra successfully deployed South Asia's largest Battery Energy Storage System (BESS) project (360MWh for Indigrid) and integrates advanced SCADA and Battery Management Systems.

C. Advait Energy Transitions Limited (AETL)

Advait Energy Transitions Limited (AETL) is tasked with managing large-scale capital expenditures and multi-district infrastructure deployments.

- **Infrastructure Scale:** AETL possesses over 15 years of industry leadership in power transmission and specializes in upgrading existing 11kV bare conductors to 55mm² Medium Voltage Covered Conductors (MVCC).
- **Mega Project Execution:** AETL has successfully executed major turnkey projects under government schemes, including a Rs. 100 Crore KSY project and a newly secured Rs. 50 Crore VKY-2 turnkey order.
- **RDSS Deployments:** AETL has secured over Rs. 200 Crores in cumulative Revamped Distribution Sector Scheme (RDSS) projects across various districts (Morbi, Bhavnagar, Rajkot, and Amreli) for PGVCL.

4. Fulfilment of Statutory Eligibility Criteria

4.1. Criteria 1: Minimum Area of Supply

The Ministry of Power amended the Distribution License Rules on 28 November 2022, stipulating that a parallel license must cover "the entire area covering either a Municipal Corporation, or three adjoining revenue districts, or a smaller area as may be notified." Eleven Power has proposed its area of supply to include the entire revenue districts of Nuh and Gurugram, Haryana. This includes the Gurugram Municipal Corporation, Manesar Municipal Corporation, Municipal Council of Sohna, Municipal Council of Pataudi Mandi, and Municipal Committee of Farrukh Nagar under the Gurugram revenue district, as well as Municipal Committee Nuh, Municipal Committee Punhana, Municipal Committee Firozpur Jhirka, and Municipal Committee Tauru under the Nuh Revenue District. This fully complies with the geographic scale mandated by the revised Rules.

4.2. Criteria 2: Capital Adequacy

As per the Rules, an applicant must demonstrate the capacity to fund a minimum of 30% of the total capital investment through internal resources and equity.

- **Projected Capital Outlay:** The total capital investment envisioned for the proposed licensed area is Rs. 4,717 Crores.
- **Equity Requirement:** 30% of this proposed investment amounts to Rs. 1,415 Crores.
- **Financial Backing:** The Promoter Shareholder, S A S Fininvest LLP, possesses a certified net worth of Rs. 4,085.60 Crores as of 30 October 2025. This net worth is primarily held in liquid or semi-liquid assets, easily exceeding the Rs. 1,415 Crore equity threshold, thereby establishing unquestionable capital adequacy.

4.3. Criteria 3: Creditworthiness

The Petitioner relies on precedents established by the Hon'ble Appellate Tribunal for Electricity (APTEL), which holds that creditworthiness is assessed by the availability of external borrowings from financial institutions based on capital adequacy norms. Eleven Power has provided Solvency Certificates for S A S Fininvest LLP for Rs. 1,000 Crores from 360 One Prime Limited and Rs. 1,000 Crores from IndusInd Bank, alongside a formal undertaking from its partners confirming their commitment to provide the necessary support to Eleven Power for arranging the required capital and securing external loan arrangements for the utility's execution and operations.

4.4. Criteria 4: Code of Conduct

The Applicant is required to prove that it has not been found guilty of or disqualified under specific sections of the Companies Act, the Income Tax Act, the SEBI Act, the Excise Act, or the Customs Act over the preceding three years. Eleven Power confirms its strict adherence to Rule 4 by submitting the necessary formal undertakings declaring that it faces no winding-up petitions, revocations, or legal disqualifications.

5. Executive Leadership and Technical Expertise

The operational success of a new distribution utility depends heavily on the experience of its management cadre. Eleven Power has engaged and is led by a team of industry veterans renowned for deploying advanced Operational Technology (OT) and Information Technology (IT), and for driving power sector reforms.

5.1 Visionaries and Strategists

- **Mr. Sunil Sachdeva (Director):** Director of Eleven Power Private Limited and Chairman of Eleven Group. A seasoned entrepreneur with over 40 years of experience across the power, healthcare, financial services, technology, and infrastructure sectors, he began his career in the power sector, leading the execution and commissioning of more than 100 substations. He also

co-founded Medanta, one of India's leading multi-specialty hospital chains, and SVCL, a financial services company serving over 19 lakh customers across 10 states. He has been recognized among the "Top 200 Self-Made Entrepreneurs of the Millennium" by IDFC (2026) and as "India's Most Respected Entrepreneur – Healthcare" by Hurun India (2024).

- Samarjit Mohanty (CEO – Distribution): An industry pioneer with 25 years of distribution experience who conceptualized India's first-ever Distribution Franchisee model.
- Manoj Kumar Singh (Advisor): Former COO of TPCODL and CGM of CESU, bringing extensive experience in managing large electrical divisions and pioneering unbundling strategies.
- Manoj Kumar Vats (Independent Director – Technology): Served as Director (Technical) at HVPNL, providing leadership over state-wide transmission networks for over 35 years.

5.2 Grid Modernization, IT, and Loss Control Experts

The technical deployment roadmap is heavily focused on smart grid architecture to curb losses and improve reliability. The core team includes:

- Maruthi Mallepalli (Advisor): Directed the installation of over 300,000 smart meters in Nigeria and specializes in integrated web and mobile billing suites.
- Gaurav Kapoor (VP – Smart Grid): Expert in ADMS, DERMS, and OMS systems, with a track record of increasing utility revenues by 30% through digital transformation.
- Rajesh Kumar Bhoi & Suryakanta Maharana: Operations and maintenance specialists focused on revenue cycle management and improving reliability indices such as SAIDI and SAIFI.

6. Strategy for Power Procurement and Renewable Integration

One of the key factors supporting the grant of the proposed license is Eleven Power's forward-looking energy procurement strategy. With Gurugram and Manesar experiencing significant industrial and infrastructure expansion, several sensitive and energy-intensive Commercial and Industrial (C&I) consumers continue to depend on highly polluting diesel generators due to concerns regarding the reliability and quality of power supply.

Eleven Power seeks to address this challenge through a transformative approach to energy sourcing. Rather than relying predominantly on conventional thermal power generation, the company proposes to procure a substantial portion of its power from Renewable Energy (RE) sources. This will be achieved through the utilization of Firm and Dispatchable Renewable Energy (FDRE) solutions and participation in the Green Day Ahead Market (GDAM), thereby ensuring that the power supplied is not only environmentally sustainable but also reliable and continuously available. The proposed strategy is closely aligned with the carbon neutrality objectives of the State of Haryana and supports the increasingly stringent Environmental, Social, and Governance (ESG) compliance requirements of global industries operating in the region.

7. Business Plan and Network Rollout Plan

Eleven Power has submitted a Business Plan and Network Rollout Plan as part of its application for a distribution license covering the entire Gurugram and Nuh revenue districts in Haryana. The business plan outlines projected load growth, energy sales, network development strategy, capital expenditure programme, and revenue requirements for a five-year period. The proposal is based on existing consumer and energy data available from DHBVN and the BEE Energy Audit Reports for FY 2023–24 and FY 2024–25.

7.1. Existing Consumer Base and Opportunity Assessment

The proposed license area presently comprises a large and diversified consumer base across residential, commercial, industrial, and agricultural categories. As per FY 2024–25 data, the area includes approximately 8.36 lakh consumers with a connected load exceeding 7,488 MW and billed energy of over 12,220 MU.

Eleven Power has positioned its proposal as a reliability-driven and technology-oriented alternative electricity distribution service provider, aimed at:

- improving the quality and continuity of supply;
- reducing dependence on diesel generation;
- deploying modern and resilient infrastructure;
- implementing advanced metering and billing systems; and
- supporting future urban and industrial expansion in the region.

7.2. Sales and Demand Projections

The sales projections have been prepared using the category-wise Compound Annual Growth Rate (CAGR) approved by HERC in the DHBVN Business Plan Order for FY 2025–26 to FY 2029–30. The projections assume growth in domestic, industrial, and commercial demand arising from ongoing urbanization, industrialization, and infrastructure development in Nuh, Gurugram–Manesar, and adjoining areas.

Total energy sales in the license area are projected to increase from approximately 12,220 MU in FY 2024–25 to approximately 18,224 MU by FY 2030–31. The residential and industrial categories constitute the major share of projected demand growth.

Eleven Power has proposed a phased market penetration strategy. Initially, Eleven Power intends to serve consumers located near its receiving stations and network corridors. Over time, as the network expands and operational reliability is demonstrated, the company expects a gradual migration of consumers from the incumbent distribution licensee (DHBVN) and the acquisition of new consumers in developing growth centres.

The proposal assumes that:

- Eleven Power's share of incremental new sales will rise from 25% in FY 2027–28 to 50% by FY 2031–32; and
- Sales assumed to switch Eleven Power's network from DHBVN will increase from 2.5% in FY 2027–28 to 5% by FY 2031–32.

Based on these assumptions, Eleven Power's sales are projected to grow from approximately 558 MU in FY 2027–28 to approximately 2,772 MU by FY 2030–31, representing approximately 3.75% of total license area sales in FY 2027–28 and approximately 15.2% by FY 2030–31. The corresponding demand to be served through Eleven Power's own network is projected to increase from approximately 212 MW in FY 2027–28 to approximately 1,067 MW by FY 2030–31.

7.3. Network Rollout Strategy

The network rollout plan forms the core of the proposal and is aimed at creating a modern, reliable, and scalable electricity distribution system. The plan is designed to ensure uninterrupted supply, redundancy, operational safety, and compliance with HERC's standards and universal service obligations.

The infrastructure planning framework is based on several key technical principles:

- maximum asset loading capped at 80%;
- adoption of N-1 reliability criteria;
- SCADA and Distribution Management System (DMS) enabled HT network;
- ring main configuration for network resilience;
- underground cable systems in Gurugram district and mixed underground-overhead systems in Nuh district;
- deployment of smart prepaid meters;
- standardized metering cubicles and communication infrastructure; and
- robust protection, isolation, and reactive power compensation systems.

7.4. Proposed Network Infrastructure

The proposed network architecture includes:

- 6 nos. of 220/33 kV bay extensions connected to HVPN substations;
- 17 nos. of 66/33 kV and 14 nos. of 66/11 kV bay extensions;
- 36 nos. of 33/11 kV distribution substations (DSS) with 105 nos. of 33/11 kV transformers;
- a 33 kV sub-transmission network of approximately 205 km;
- an 11 kV feeder network of approximately 1,020 km with approximately 340 nos. of 11 kV feeders;
- extensive LT distribution infrastructure of approximately 4,080 km in length with 13,600 nos. of distribution transformer centres (DTCs).

The infrastructure rollout is geographically distributed across the Gurugram Suburban, Gurugram City, Manesar, Sohna, and Nuh divisions. The 33/11 kV substations are proposed with varying transformer capacities such as 2×12.5 MVA, 3×12.5 MVA, and 4×12.5 MVA configurations, depending on local load density and demand characteristics.

The LT network rollout is based on a standardized feeder design comprising:

- 40 distribution transformers per feeder;
- 100 kVA transformer capacity at 80% loading;
- an average service line length of 30 metres per connection; and
- approximately 400 consumer connections per feeder.

7.5. Phasing of Network Development

The network rollout is proposed in a phased manner from FY 2026–27 to FY 2030–31. The rollout strategy is intended to support progressive consumer migration and future load growth while maintaining high standards of reliability and service quality.

7.6. Capital Investment Plan

The proposal estimates significant capital expenditure for both the wires business and supply business infrastructure. The total proposed capital investment for the wires business is estimated at approximately Rs. 4,650 Crores over the five-year rollout period.

In addition, the supply business capital expenditure of approximately Rs. 66 Crores covers:

- smart meters;
- customer relationship centres;
- automation systems; and
- bill collection infrastructure.

The business plan submitted by Eleven Power proposes the establishment of a parallel and technologically advanced electricity distribution network in the Gurugram and Nuh revenue districts. The proposal is centred around improving supply reliability, reducing outages and losses, enabling consumer choice, and supporting the rapidly growing industrial and urban demand in the region. The network rollout strategy emphasizes modern infrastructure, smart grid technologies, underground cabling, SCADA-enabled operations, and phased capacity augmentation. The plan also envisages substantial capital investment to create a resilient and future-ready distribution system capable of catering to the evolving energy requirements of the proposed license area.

7.7. Aggregate Revenue Requirement (ARR)

The ARR for FY 2027–28 to FY 2030–31 has been estimated based on the provisions of the HERC Multi-Year Tariff (MYT) Regulations, 2024. The Average Cost of Supply (ACoS) for FY 2027–28 to FY 2030–31 is projected to vary from Rs. 7.72/kWh to Rs. 8.16/kWh, compared to the projected ACoS of Rs. 7.77/kWh to Rs. 8.49/kWh for DHBVN, considering the average increase in ACoS over recent years.

8. Prayers to the Commission

The Petition establishes that Eleven Power intrinsically fulfils all statutory prerequisites for the grant of a distribution license. The robust financial foundation of the Promoter entity, paired with strategic EPC and operational partnerships, mitigates the inherent risks of launching a new utility. The following prayers are made in the Petition:

- Grant a parallel Distribution License for a period of 25 years covering the Nuh and Gurugram revenue districts, pursuant to Section 14 of the Electricity Act, 2003.
- Pass any other orders deemed appropriate to facilitate consumer choice and systemic efficiency.
- Condone any procedural delays or omissions and permit further evidentiary submissions as required.