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Ref: RA/2021-22/01/A/074

Date: 05.05.2021

To,
The Secretary
Delhi Electricity Regulatory Commission
Viniyamak Bhavan, Shivalik
Malviya Nagar, New Delhi-110017

Sub: Revision in Projections in ARR Petition No. 1 of 2021 for FY 2021-22 considering prevailing unprecedented situation of outbreak of the Second wave of the Covid-19 pandemic and imposition of Curfew in the NCT of Delhi by DDMA Order No. F.2/07/2020/PT file-III/381 dated 19th April'2021 and other restrictions.

Ref.:

- (a) BRPL Letter dated 15.12.2020 submitting ARR Petition of FY 2021-22.***
- (b) BRPL Letter dated 19.04.2021 requesting for recognition of Force Majeure conditions.***
- (c) This Hon'ble Commission's Order dated 27.04.2021 recognition of Force Majeure conditions.***

Dear Sir,

1. We write in continuation of our communication dated 15.12.2020, through which we had filed our Petition No. 1 of 2021 seeking Annual Revenue Requirement (ARR) for the FY 2021-2022. This Hon'ble Commission by its Order dated 19.02.2021 was pleased to admit the said Petition which was listed for public hearing held from 15.04.2020 to 20.04.2021 after taking into consideration the comments and suggestions from the stakeholders.

2. However, from the month of April 2021 there has been unprecedented and steep surge of the Second wave of the Novel Corona Virus 2019 (COVID-19) pandemic ("***Second Wave***"). The NCT of Delhi has been one of the worst affected States by the Second Wave. The rapid pace and deadly virulence at which the virus has spread in the Second Wave is an unprecedented and unforeseen situation. The situation has escalated and developed in the last 10-15 days only and

there has been a pervasive surge in the cases in April, 2021. Impact of this Second Wave is more widespread and severe which has created a situation more dismal and catastrophic from even last year. This is unlike anything that anyone has witnessed so far.

3. As per information available as on 23.04.2021, the total Corona positive cases reported in Delhi are 26,169 having 36.2% positivity rate which is the highest ever recorded, since the outbreak of the pandemic from March last year, in the NCT of Delhi. Owing to the surge in COVID-19 infections, the Hospitals and medical infrastructural facilities are overwhelmed with the situation and are struggling to meet the demand of beds, critical care, oxygen and medicines. In view of the above and in public interest and to contain the spread of the Second Wave, the Delhi Disaster Management Authority (“**DDMA**”) by its Orders dated: -

- (a) 06.04.2021 No. F/1.(571)/DDMA(HQ)/DDMA Orders/Misc. Matters/21/364 had imposed night curfew on the movement of the individuals (except a few categories of individuals who were exempted from the said restriction) till 30.04.2021 or further Order whichever was earlier.
- (b) 15.04.2021 No. F/1.(589)/DDMA(HQ)/Misc. Matters/COVID/21/ 373– imposed weekend curfew from 10:00 PM on 16.04.2021 till 5:00 AM on 19.04.2021 and imposed the following restrictions/conditions till 30.04.2021 or further Orders (whichever was earlier), and directed as under:
 - “i. All Shopping Malls, Gymnasiums, Spas, Auditoriums, Assembly Halls, Entertainment Parks and similar places will be closed.
 - ii. Cinemas/Theatres/Multiplexes will be permitted to open with 30% of their seating capacity.
 - iii. Only one weekly market per day per zone in all three Municipal Corporations/ New Delhi Municipal Council/ Delhi Containment Board shall be allowed subject to the strict compliance of enclosed SOP and all instructions / guidelines issued by Gol / GNCTD from time to time to contain the spread of COVID-19.”
 - iv. Bar & Restaurants shall not be allowed to operate. Restaurants may give only home delivery/take away.”
- (c) 19.04.2021 No. F.2/07/2020/pt file-III/381- imposed a curfew on movement of individuals within the NCT of Delhi with effect from 10 PM on 19.04.2021 to 5.00 AM on 26.04.2021. The commercial and industrial activity apart from essential activities/ services as listed in the said Order were closed till 30.04.2021 or further orders whichever was earlier.
- (d) 25.04.2021 No. F.2/07/2020/pt file/III/397 – the curfew was extended from 05.00.AM 26.04.2021 to 5.00 AM on 03.05.2021 and the essential activities/services as stipulated in the aforesaid Order dated 19.04.2021 are continued till 03.05.2021.

4. The containment measures taken by the DDMA have resulted in:

- (a) Closure of shopping malls, auditoriums, educational institutes like coaching centers, schools, colleges etc., gyms, spas, bars and dine-in services at restaurants etc.

- (b) Gradual reduction in demand and consumption of essential public utilities like DIAL, DMRC as well as the Industrial, Commercial and Public Utilities category of consumers.

5. Although the services relating to generation, transmission and distribution of electricity have although been exempted from the Orders, however, the impact of the Second Wave on the workforce in general and on the frontline field staff of BRPL in particular has been very grave. BRPL is only concentrating on maintaining supply of electricity esp. for essential services, medical establishments, hospitals, and essential public service utilities namely, DIAL and DMRC.

6. Taking cognizance of the Order dated 19.04.2021 passed by the DDMA, this Hon'ble Commission by its Order dated 27.04.2021 has been pleased to: -

- (a) recognize the outbreak of the Second wave of COVID-19 as a Force Majeure condition; and
- (b) Suspend the Standards of Performance under Regulation 83 and 85 of DERC (Supply Code and Performance Standards) Regulations, 2017 ("**Supply Code**") w.e.f. 19.04.2021, till further orders.

Pursuant to the same, BRPL has been taking proactive steps to mitigate and address the exigencies created on account of this unprecedented situation.

7. This Second Wave is more widespread and severe which has created a situation more dismal and catastrophic from even last year. This is unlike anything that anyone has witnessed so far. The rate of infections and the number of infected cases is showing an increasing trend. As of now, the continuance and duration of this unprecedented Second Wave cannot be ascertained by any reasonable or prudent means.

8. On account of the above, our financials and the ARR projections for FY 2021-2022 have been severely impacted / are likely to be further severely impacted in the future and there has been/ is also *inter-alia* an impact on:

- (a) Billing.
- (b) Bill Distribution
- (c) Collections
- (d) Power purchase
- (e) Collection efficiency.
- (f) Estimation and Projection of Revenue
- (g) T&D losses owing to reduction in demand at EHT and HT level.
- (h) Capex and Opex Projections.
- (i) Payment Obligations.
- (j) Payments and ad hoc expenditure to meet emerging exigencies and COVID protocols for workforce and processes.

A. Projection of Sales:

9. In Table 4-2 of our Tariff Petition for FY 2021-22 (Page 330), we had provided the Sales projections for all categories of consumers for FY 2021-22 based on a fair assumption that the situation would gradually improve with time. It was believed, based on reasonable assumptions at that time, that slowdown from the first wave would be minimal and commercial, industrial and public utilities such as DIAL, DMRC's etc. consumption will ramp up in full swing starting from April, 2021. However, the rapid and unprecedented surge in the infections in the Second Wave in April, 2021 again has had an adverse impact on these activities and is likely to have a cascading effect in the future months as well.

10. The measures by the GoNCTD and DDMA to contain the sudden surge of infections and mortality rate in this Second Wave, are more or less similar to the measures adopted during the first wave. Under the present circumstances and considering the trend in FY 2020-21 *it is estimated that energy sale to Non-Domestic / Commercial, Industrial, Public Utilities, (DIAL and DMRC) may be significantly less than the energy sales we achieved during FY 2020-21 and not the projected sales figures*. It is a reasonable assumption at this time, considering the severity and positivity rate of the current surge that the energy sales to these categories will be at least 10% less than the sales energy sales realized during FY 2020-21.

11. As seen from the last year's trend, among all Discoms in the NCT of Delhi, BRPL gets significantly affected as around 53% of our revenue comes from the said consumer categories. Since the tariff proceedings for FY 2021-22 are underway and have not been concluded, it is requested that the impact of the above un-controllable and unprecedented factors may be considered by this Hon'ble Commission. Accordingly, BRPL requests the Hon'ble Commission to consider energy sales projection for FY 2021-22 for the above-mentioned consumer categories as per the following:

Sl. No.	Tariff Categories	Revision	Comments
1.	Domestic	No revision	Original projection is retained as there is minimal impact on account of COVID as significant consumers are working from home due to closure of offices, schools, business entities
2.	Non-Domestic	10% reduction over actual of FY 2020-21	10% reduction is considered due to greater intensity of COVID-19 and consequent closure of businesses and commercial entities.
3.	Industrial	10% reduction over actual of FY 2020-21	10% reduction is considered due to greater intensity of COVID resulting in shutting

Sl. No.	Tariff Categories	Revision	Comments
			down of industrial units.
4.	DIAL	10% reduction over actual of FY 2020-21	10% reduction is considered due to greater intensity of COVID and as a result operations of Delhi Airport been curtailed significantly.
5.	DMRC	10% reduction over actual of FY 2020-21	10% reduction is considered due to reduced frequency of Delhi Metro operations.
6.	Temporary	10% reduction over original projection of FY 2021-22	10% reduction is considered due to greater intensity of COVID.
7.	EV Charging	10% reduction over original projection of FY 2021-22	10% reduction is considered due to greater intensity of COVID.
8.	Rest categories	Original projection is retained.	

12. For reference of the Hon'ble Commission, actual energy Sales during FY 2019-20 and FY 2020-21 is tabulated below:

Sl. No.	Category	Provisional FY 20-21 (MU)	Actual FY 19-20 (MU)
1	Domestic	7,667	7,694
2	Commercial	2,200	3,164
3	Industrial	420	535
4	Agriculture	23	21
5	Mushroom	-	-
6	Public Utilities (DJB & PL)	374	379
7	DIAL	15	146
8	DMRC	187	412
9	Advertisement	1	1
10	Temporary	109	108
11	Charging Stations	19	25
12	Self consumption	16	17
13	Enforcement	46	47
14	Net Metering		13
15	Total	11,077	12,563

13. In view of the aforementioned factors and emerging scenario given the exigencies of the situation, BRPL requests the Hon'ble Commission to consider the revised Energy sales projection for FY 2021-22 as tabulated below:

Sl. No.	Category	Original ARR Projection for FY 2021-22 (MU)	Revised Projection for FY 2021-22 (MU)
1	Domestic	8,626	8,626
2	Commercial	3,018	1,980
3	Industrial	528	378
4	Agriculture	24	24
5	Mushroom	-	-
6	Public Utilities (DJB & PL)	393	393
7	DIAL	36	14
8	DMRC	408	169
9	Advertisement	1	1
10	Temporary	108	97
11	Charging Stations	59	53
12	Self consumption	17	17
13	Enforcement		-
14	Net Metering		
15	Total	13,219	11,752

14. Accordingly, the Energy input at E2 level of BRPL is recalculated as tabulated below:

Sl. No.	Particulars	UoM	Quantity
1	Projected Energy Sales	MU	11,752
2	Distribution Loss	%	8%
3	Energy Requirement at E2	MU	12,774

B. Targets for Collection Efficiency and T&D losses:

15. As already explained hereinabove, there has been a drastic reduction in commercial and industrial activity in BRPL's area of supply. The impaired Commercial and Industrial activities would also have an adverse impact on the revenue collection including Enforcement drives of BRPL.

16. There are various other factors which will also adversely and gravely impact the collection efficiency and recovery of BRPL are being detailed below:

(a) Field visits for:

- (i) Recovery/collection has been temporarily stopped, and follow-ups on consumers / defaulters shall be done by phone calls.

- (ii) Enforcement activities including inspections and recovery has been temporarily suspended. This will have an adverse impact on Enforcement recoveries which will have impact on T&D.
 - (b) Cash counters will be allowed to operate only in a restricted manner in view of the restrictions in the public transport system.
 - (c) Various consumers (such as Shopping Malls, Movie Halls, other commercial establishments) have indicated their inability to make timely payments due to the prevailing situation.
17. The reduction in collection of revenue from the consumers will have an impact on the targets for Collection Efficiency and T&D loss level for the FY 2021-22, as stipulated under Regulation 26 of the Delhi Electricity Regulatory Commission (Business Plan) Regulations 2019. Presently, the measures relating to Loss Reduction and Enforcement activities have been stopped which shall also have an impact on the achievement of T&D losses and Collection Efficiency.
18. In view of the above, it is requested that Collection Efficiency for FY 2021-2022 be considered as per **Annexure 1** herein below. BRPL would also like to bring it to the notice of this Hon'ble Commission that the cumulative impact of reduction in collection efficiency, depressed cash flow in view of the prevailing situation will have an adverse bearing on the payment obligations towards salaries to employees, O&M expenses, A&G Expenses, Contractual Employees who are maintaining the supply of power, Banking obligations and dues of power suppliers.

C. O&M Expenses and Capital Expenses

19. Although the services relating to generation, transmission and distribution of electricity have been exempted from the Orders. However, the impact of the Second Wave on the workforce in general and on the frontline field staff of BRPL in particular has been very grave. The country had still not recovered from the impact of the First Wave, when the Second Wave hit. Our workforce has been performing its duties relentlessly and thanklessly since March 2020. Without caring for their own personal safety, our field staff have acted like front line workers and made all efforts to ensure continuity and reliability of supply in our area of supply.
20. Since the start of the pandemic till March 2021 around 316 nos. of our employees got infected and 2 nos. of our employees succumbed with the COVID-19 virus. However, since March 2021 till date, around 278 nos. of our employees got infected and 8 nos. of our employees succumbed with the COVID-19. Even the employees of our vendors/ contractors are suffering and have been severely infected with the virus. Owing to the surge in COVID-19 infections, the Hospitals and medical infrastructural facilities are overwhelmed with the situation and are struggling to meet the demand of beds, critical care, oxygen and medicines. The overall morale of all the employees is at an all-time low and there is an atmosphere of fear and uncertainty all across the organisation. The workforce, especially the skilled manpower and technically

proficient labour, is scarce and there are a lot of unforeseen and uncontrollable delays that are being caused and will for performing their day to day functions.

21. On account of the above, BRPL is facing substantial issues and is concentrating on maintaining supply of electricity especially for essential services as well as safety of its employees/ third party contractors, vendors and public at large. The workforce, especially the skilled manpower and technically proficient labour, is scarce and there are a lot of unforeseen and uncontrollable cost escalations that are being incurred and will be incurred by BRPL to maintain continuity and reliability of supply especially to essential services and for arranging for medical facilities for the existing workforce. It is submitted that we are: -

- (a) Considering all employees (whether retainers/ contractual/ contract labour/ temporary etc) that are suffering from COVID-19 on paid leave.
- (b) making all efforts to provide medical facilities/ oxygen/ beds/ medicines available to them. A plan for treatment of the employees infected with COVID-19 is being provided herewith as **Annexure 1**.
- (c) making all efforts to arrange for temporary replacements for the home isolated and/or infected employees. However, due to the current situation, there is a lot of migration of the labour from the NCT of Delhi.

22. On account of the above, it is submitted that: -

- (a) the cost of labour, especially temporary labour, has gone up to almost double the amount in the normal circumstances. Further, skilled labour is scarce and not available.
- (b) The remaining labour and employees that are left are extremely apprehensive about their personal safety and health in view of dire situation prevailing in the NCT of Delhi.
- (c) Accordingly, manpower cost may go up and thus the overall component of manpower cost would be beyond the norms determined by this Hon'ble Commission.
- (d) Further, to maintain supply and to execute critical schemes related to reliability of supply, a situation can arise, when material needs to be procured, on urgent basis. This may lead to a situation where the material has to be procured in accordance with the Competitive Guidelines approved by this Hon'ble Commission.

23. In view of the above, it is requested that: -

- (a) Additional Opex be allowed as additional manpower, vehicles, IT infrastructure would need to be further strengthened, further manpower, health and insurance expenses will go up.
- (b) Escalations in the Employee Costs and overall O&M FY 2021-2022 be allowed as projected in **Annexure 1**.

24. BRPL by subsequent communications shall apprise the Hon'ble Commission and duly place on record the necessary data, facts and figures and other developments to further substantiate its case as the situation develops at present as well as in the future months. The present unprecedented and unforeseen situation could not have been factored in at the time of finalising and filing of the ARR Petition for FY 2021-22 in the month of December 2020.

25. Substantial variations in view of the prevalent conditions have necessitated revisions to the assumptions and projections considered in the ARR Petition, which in its present form, and in view of the unprecedented circumstances, will not be indicative of the correct position. Therefore, we are constrained to submit revised Projections/Estimates for determination of ARR for FY 2020-21 based on the current situation which has been enclosed as **Annexure 1**.

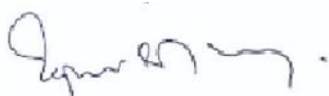
26. BRPL submits for the kind consideration of the Hon'ble Commission that as BRPL has sought revisions to the projected ARR in view of the emergent situation on account of resurgence of COVID-19. BRPL would be ready and willing to provide such data and figures to this Hon'ble Commission to substantiate the projections for FY 2021-2022, are more aligned to realistic, ground realities in the present adverse context.

27. It is submitted that no prejudice shall be caused in case the request of BRPL is allowed and the revised projections for FY 2021-22 as enclosed in **Annexure 1** are considered, as the Tariff determination process is still underway and not concluded. However, irreparable loss and prejudice will be caused to BRPL in case the request is not allowed as there is a substantial impact on the working capital and incidental costs.

Thanking You,

Yours faithfully

For BSES Rajdhani Power Limited



Rajeev Chowdhury
HoD (Regulatory Affairs)

CC:

Encl: Revised Tables sought to be replaced with Tables in Chapter 4 of ARR Petition for FY 2021-22.

Annexure 1

1. REVISION IN ENERGY SALES AND REVENUE

Under the circumstances detailed in this letter and considering the trend in FY 2020-21 *it is estimated that energy sale to Non-Domestic / Commercial, Industrial, Public Utilities, (DIAL and DMRC) may be significantly less than the energy sales we achieved during FY 2020-21 and not the projected sales figures*. It is a reasonable assumption at this time, considering the severity and positivity rate of the current surge that the energy sales to these categories will be at least 10% less than the sales energy sales realized during FY 2020-21.

As seen from the last year's trend, among all Discoms in the NCT of Delhi, BRPL gets significantly affected as around 53% of our revenue comes from the said consumer categories. Since the tariff proceedings for FY 2021-22 are underway and have not been concluded, it is requested that the impact of the above un-controllable and unprecedented factors may be considered by this Hon'ble Commission. Accordingly, BRPL requests the Hon'ble Commission to consider revised energy sales projection for FY 2021-22 for the above mentioned consumer categories as per the following logic:

- For Domestic - Original projection is retained as there is minimal impact on account of COVID as significant consumers are working from home due to closure of offices, schools, business entities.
- For Non Domestic - 10% reduction over actual of FY 2020-21. 10% reduction is considered due to greater intensity of COVID-19 and consequent closure of businesses and commercial entities.
- For Industrial- 10% reduction over actual of FY 2020-21. 10% reduction is considered due to greater intensity of COVID resulting in shutting down of industrial units.
- For DIAL - 10% reduction over actual of FY 2020-21. 10% reduction is considered due to greater intensity of COVID and as a result operations of Delhi Airport been curtailed significantly.
- For DMRC - 10% reduction over actual of FY 2020-21. 10% reduction is considered due to reduced frequency of Delhi Metro operations.
- For Temporary - 10% reduction over original projection of FY 2021-22. 10% reduction is considered due to greater intensity of COVID.
- For EV Charging - 10% reduction over original projection of FY 2021-22. 10% reduction is considered due to greater intensity of COVID.

For rest categories - Original projection is retained.

Since the base assumptions and criteria for estimation of energy sales stands revised, this revised energy sales would have a consequent revision in estimated revenue and energy requirement at E2.

The Petitioner therefore requests the Hon'ble Commission to kindly consider the revised tables tabulated hereunder and replace the corresponding tables in Chapter 4 of the ARR Petitioner filed by the Petitioner for FY 2021-22:

Table 4-2 on Page 326 to be replaced with the following Table:

Sales, Connected Load and Number of Consumers projected for FY 2021-22

Sl. No.	Category	FY 2021-22		
		Sanctioned Load (MW)	No. of Consumers (Nos.)	Sales (MU)
1	Domestic	6515	2475181	8626
2	Non Domestic	2543	347925	1980
3	Industrial	298	5384	378
4	Agriculture	42	5904	24
5	Mushroom Cultivation	0	14	0
6	Public utilities (DJB & PL)	190	9091	393
7	DIAL	51	1	14
8	DMRC	146	9	169
9	Advertisement/Hoarding	2	853	1
10	Temporary	0	0	98
11	Charging Stations E-Vehicle	40	1926	53
12	Self Consumption	11	320	17
13	Total	9838	2846607	11753

Table 4-3 on Page 327 to be replaced with the following Table:

Power Factor Considered for FY 2021-22

Sl. No.	Category	Value
1	Domestic	NA
2	Non Domestic	
	Non Domestic LT	0.95
	Non Domestic HT	0.97

3	Industrial	
	Industrial LT	0.94
	Industrial HT	0.98
4	Agriculture	NA
5	Mushroom Cultivation	NA
6	Public utilities (DJB & PL)	
	Public utilities (DJB & PL) LT	0.89
	Public utilities (DJB & PL) HT	0.92
7	DIAL	1.00
8	DMRC	1.00
9	Advertisement/Hoarding	0.96
11	Charging Stations E-Vehicle	1.00

Table 4-4 on Page 328 to be replaced with the following Table:

Revenue Billed estimated during FY 2021-22 (Rs. Crore)

S.No.	Category	Fixed Charges	Energy Charges	TOD Sur+Rebate	Total
		(Rs. Cr.)	(Rs. Cr.)	(Rs.Cr.)	(Rs. Cr.)
1	DOMESTIC	497	3845	0	4342
1.1	INDIVIDUAL CONNECTIONS	478	3729	0	4207
A	Up to 2 kW Sanctioned Load	61	1590	0	1650
	0-200 units	35	348	0	383
	201-400 units	18	532	0	550
	401 – 800 units	7	544	0	551
	801-1200 Units	1	112	0	112
	Above 1200 Units	0	54	0	54
B	Between 2kW and 5 kW Sanctioned Load	97	908	0	1005
	0-200 units	27	43	0	70
	201-400 units	35	172	0	207
	401-800 units	27	378	0	405
	801-1200 Units	7	214	0	220
	Above 1200 Units	2	100	0	102
C	5 kW - 15kW Sanctioned Load	229	957	0	1186

	0-200 units	49	10	0	59
	201-400 units	48	47	0	95
	401-800 units	66	204	0	270
	801-1200 Units	34	233	0	267
	Above 1200 Units	32	462	0	494
D	15 kW - 25kW Sanctioned Load	41	120	0	161
	0-200 units	4	0	0	4
	201-400 units	2	0	0	3
	401-800 units	6	3	0	9
	801-1200 Units	6	8	0	14
	Above 1200 Units	23	108	0	131
E	Above 25kW Sanctioned Load	49	155	0	204
	0-200 units	2	0	0	2
	201-400 units	1	0	0	1
	401-800 units	2	0	0	2
	801-1200 Units	2	1	0	3
	Above 1200 Units	42	154	0	196
1.2	Single Delivery Point on 11 KV for GHS	16	91	0	107
1.3	Hospital (11KV)	3	14	0	16
1.4	Worship (11KV)	0	2	0	2
1.5	DVB Staff	0	9	0	10
2	NON-DOMESTIC	763	1686	10	2459
	Upto 3kVA	110	130	0	240
	Above 3kVA	653	1556	10	2219
3	INDUSTRIAL	89	303	3	395
4	AGRICULTURE	6	4	0	10
5	MUSHROOM CULTIVATION	0	0	0	0
6	PUBLIC UTILITIES (DJB & PL)	57	268	-1	325
7	DIAL	15	10	0	26

8	DMRC	44	101	4	149
9	ADVERTISEMENT & HOARDINGS	1	1	0	2
10	TEMPORARY SUPPLY	0	57	0	57
11	CHARGING STATIONS E VEHICLE	0	24	0	24
	Supply at LT	0	24	0	24
	Supply at HT	0	0	0	0
12	SELF CONSUMPTION	0	0	0	0
13	Total Billed	1,472	6,299	16	7,788
14	Total Revenue Collection @ 83.2%				6,478

Table 4-5 on Page 332 to be replaced with the following Table:

Energy Requirement for FY 2021-22

S.No.	Particulars	Unit	Quantity	Remarks
A	Energy Sales	MU	11,753	Cross Reference of Table
B	Distribution Loss	%	8.00%	As per BPR 2017, 24(4)
C	Energy Requirement	MU	12,775	$C = A/(1-B)$
D	Distribution Loss	MU	1,022	$D = C-A$

2. REVISION IN POWER PURCHASE QUANTUM & COST

In view of the emerging scenario given the exigencies of the situation and considering various arrangements as per summer preparedness of FY 2021-22, BRPL has backed down costly station i.e. Dadri-2.

BRPL requests the Hon'ble Commission to consider the revised Power Purchase projection for FY 2021-22.

Table 4-15 on Page 349 to be replaced with the following Table:

Particulars	Projections for FY 2021-22					
	Energy Purchase	AFC	Energy Charges	Other Charges	Total PPC	Total PPC
	MU	Rs. Crore	Rs. Crore	Rs. Crore	Rs. Crore	Rs./kWh
Existing Sources						
NTPC Ltd.	3,919	901	1,018	0	1919	4.90
NHPC Ltd.	1,042	148	137	0	285	2.73
Nuclear Power Corp. of India Ltd.	430	0	147	0	147	3.41
SatlujJalVidyut Nigam Ltd.	275	41	35	0	76	2.75
Tehri Hydro Development Corp. Ltd.	201	50	48	0	98	4.87
PTC	190	0	61	0	61	3.21
Damodar Valley Corporation	1,128	217	299	0	516	4.57
Power stations in Delhi	1,948	500	580	0	1080	5.54
Aravali Power Corporation Ltd .	26	12	9	0	22	8.38
UMPP	490	8	63	0	71	1.45
SECI	43	0	24	0	24	5.50
Past Arrears		621			621	
New Sources	1,524	6	408	0	414	2.72
Total	11,215	2,505	2,827	0	5,332	4.75
Short-term Purchase	3,212		1,084		1084	3.37
Short-term sale	1,078		321		321	2.98
Transmission Charges	-576				1,381	
REC Purchases					1	
Rebate					106	
Grand-Total	12,774				7,372	5.77

BRPL without prejudice to its rights and contentions has considered and included Anta Gas, Unchahar-1, Farakka, Kahalgaon – 1, Dadri Gas and Auraiya Gas plants as part of its power purchase projections for FY 2021-22, and is simultaneously in the process of taking necessary steps to be excused from the rigours of the existing contractual terms with respect to the above 6

Stations of NTPC, BRPL will apprise the Hon'ble Commission as and when the situation crystallizes. Accordingly, BRPL craves leave to reserve its rights to seek appropriate allowances/relief from the Hon'ble Commission at the appropriate stage.

3. EXPENSES RELATED TO COVID-19 TO SAFEGUARD THE EMPLOYEES

At BSES Rajdhani Power Ltd. welfare of employees has always remained at top priority. Management has always believed that employees are the most precious assets of an organization. During this Pandemic time of great uncertainty management is trying its level best for the safety and well-being of its workers. On advice of our CEO and CHRO and under their guidance, with a motive of extending every possible help to our workers in the Pandemic crises, an **Employee Relation Cell** was created last year itself.

- **Medical Facilities**

Employee Relation Cell Control Room with contact No.011-49209993 has been established which is working 24 hours to assist our employee in emergency situation round the clock. Control Room guides and helps our employees in hospital admission and provides emergency number of hospitals, Labs etc. Two doctors of our medical team Dr. Dhiraj Gandhi and Dr. Neeleshwar Tripathi remain in constant contact with this Control Room even in late night hours for providing any medical assistance and to guide the paramedical staff /home quarantine employees. We are also planning to run ambulances for our employees. Ambulance facilities will be provided to workers getting admitted in hospitals etc.

All the six dispensaries being run by the company have been kept on high alert right from the time when Corona virus started infecting people in India. Every employee, whether on roll or out sourced has been informed about the locations, working hours and doctors on duty with their contact numbers through circulars. Stock of all the essential medicines has been provided to each such dispensary.

Employee Relation Cell is providing the Safety Kit (Mask, gloves, Sanitizer PPE Kit etc.) to the employees of BRPL. For this purpose, managing stock of safety kit in advance to avoid any delay or lack of in our fight against COVID-19. Employee Relation Cell is also providing at the door step of employees who are home quarantined a special COVID Protection & Medical Kit prepared under guidance of our senior doctors. Officials of this cell remain in constant touch with the infected employees through telephone to get their feedback to know and monitor their health status and in case any help is needed same is provided them without wasting precious time.

- **Vaccination Drive for company's employees**

Electricity worker comes under the category of front-line workers hence many of our employees have been vaccinated on priority basis. Govt. of NCT of Delhi had organized a

Vaccination at Office Drive in Delhi. Our employees could avail this facility; we had established two centers for the Drive in our company. Many of our employees above the age of 45 years availed this facility in these centers. Thereafter we have tied-up with Escort-Fortis hospital to provide vaccination facility for our employees. But at present employees over 45 years can avail this facility.

We have planned to vaccinate remaining employees, who are in the age group of 18 to 45 as per govt. norms starting from 1st May, 2021. To facilitate our employees in getting vaccination we are trying to tie-up with few reputed hospitals. For the employees who have vaccinated themselves through private hospitals of their own we have adopted a very short and simple procedure for the reimbursement of the vaccination cost.

- **Distribution of COVID Protection Kits**

Every office/work station is religiously following each and every instructions/precaution issued by Union Home Ministry or by Govt. of NCTD. At entry gate of every building/premises security guards with proper protection are doing thermal scanning of each and every employee who enters the building.

Attendance of our employees is being done through mobile app and we have stopped biometric attendance to reduce the danger of spreading the virus through physical contact.

Employees have been provided with, masks, gloves, face shields, sanitizer etc. for their personal protection and we are doing sanitization of all our building and offices on regular basis.

In order to reduce gathering in the office premises and practically follow the social distancing guidelines we have allowed considerable number of our employee to Work from Home. In this way we have reduced the risk of spreading of virus to our employees.

- **Establishment of Quarantine facility**

Self-isolation/quarantine is required for an individual who gets infected from Corona virus. Many of our workers lives in small houses where they do not have enough room to undergo proper quarantine. To resolve this difficulty of our workers we have establish 4 different centers with all the facilities for a worker to peacefully quarantine him/herself. We have established total 14 such room for undergoing self-isolation/quarantine.

- **Insurance Facility**

Every worker whether on roll employee or out sourced a special COVID life cover of minimum Rs.10 lakh has been provided to all.

An emergency fund has been created to provide immediate financial help to an employee for treatment of COVID-19. Through this Company created a **BRPL Corporate Social Responsibility Trust** is bearing major portion of expenses incurred by an employee for his/her COVID treatment. In the event of hospitalization an employee can get financial help up to Rs. 3 lakh through this trust subject to his/her entitlement and norms.

Company is leaving no stone unturned in providing up to the mark safety and security of its employees and will keep improving with the time as per the instructions and suggestions from government and medical fraternity, but in order to deal with the present crises we need little help/favours from DERC and the Government.

- **Incentive Schemes for the Workers**

In an attempt to boost the morale of our employees and to motivate them to keep performing their duties of providing essential service to the citizens of NCT of Delhi, we have launched special incentive scheme for our employees. Under this scheme we provide extra remuneration to those employees who actually work in field and come under direct contact of consumers.

- **Immediate vaccination of the remaining employees**

Significant number of our workers has been vaccinated on priority basis under government scheme, being the front-line workers but still many workers have not been vaccinated specially employees under the age of 45 years. We request that Govt. provide facility to vaccinate these remaining workers under the same scheme at the earliest.

- **Extension of Ex-gratia Scheme for BRPL employees**

Govt. of NCT of Delhi has passed orders to pay Ex-gratia amount of Rs. 1 crore to those persons who expires by contracting the disease during the discharge of his duties, his/her family will be paid an e-gratia of amount One Crore, posthumously.

BRPL workers are performing their duty of providing uninterrupted supply of electricity of the resident of Delhi, with full dedication. Supply of non-stop electricity is not at all easy thing to do in the dangerous Pandemic atmosphere, but our employees are performing their duties diligently as they know that electricity supply has become more important during the present crisis.

Hence it is requested that Govt. should extend this facility of Ex-gratia payment of Rs. 50lakhs to BRPL employees as well, as electricity workers definitely comes under the category of front-line workers and we are playing our part in the fight against the Corona Virus with full commitment and enthusiasm.

Requirement of Additional amount for the expenses

As explained above BRPL is continuously providing every possible facility to its worker for their personnel safety and wellbeing. Company is expending crores of rupees in these facilities. Company had to arrange finance on urgency basis for providing these facilities as no one had fore-thought that. It is requested that Govt. should bring some incentives schemes for the electricity companies to ease their financial burden. DERC must also give some relives to DISCOMS in ARR.

- **Additional facilities for our employees**

Many of our employee's lives in NCR satellite towns like NOIDA, Faridabad, and Gurgaon etc. As these employees are serving Delhi residents, they must be allowed to get treatment in various Medical hospitals and centers of Delhi.

- **Permission to hire additional man power on temporary basis**

Many of our workers are getting infected from the Corona virus and are either undergoing quarantine or has been hospitalized for the treatment. At present we are facing shortage of workers specially for performing field jobs. It is therefore requested that special permission for hiring workers on short terms basis to overcome the sudden shortfall of manpower in the company, be granted. In the event of hiring additional man power on temporary basis company will have to bear additional cost as salaries of workers who are not in a condition to work due to Corona infection cannot be stopped and salaries of temporary workers will enhance salary expenses of the company. At the same time expenses towards Corona Protection equipment will also get increase due to increase in total workforce.

- **Appointment of Nodal Officer for Electricity Company**

Due to sudden increase in number of persons getting infected from Corona virus it has become very difficult to get admitted in hospital. Our doctors are advising employees to not to rush to hospitals in panic and remain in home quarantine until and unless hospitalization becomes necessary. Condition of many workers becomes so critical that hospitalization becomes unavoidable. To get our seriously ill workers hospitalized without delay Govt. must appoint one Nodal officer for the purpose who could help us in saving precious life of front-line workers.

- **Transit Treatment Facility**

At BRPL we are planning to develop a "Transit Treatment Facility" for our front-line workers, this Transit Treatment Facility centers may be declared as Camp Hospital by the authorities so that immediate medical care is provided to a needy till he/she is shifted to a designated COVID hospital. To establish this facility, we will need the following facilities urgently along with the permission to develop these Transit Treatment Facility,

1. Oxygen cylinder 20 No duly filled with permission of refilling them.
2. Oxygen Concentrator Unit- 3 nos.

3. Permission for our doctors to administer Remdesiver and other lifesaving vaccine and medicine in our “Transit Treatment Facility” treating this facility as Camp hospital.
4. Permission to operate ambulances for our front-line workers.

Accordingly the expenses for next 6 months are estimated as under:

S. No	Category	Numbers	Cost / Unit	Amount (Rs. Lakh) per month basis	Amount (Rs. Cr.) for next 6 months
1	Incentive for Front Line workers	5100	3500	178.50	10.71
2	Additional Manpower of 10% of front line workers Per Month	510	25500	130.05	7.80
3	Term Insurance for Rs 20 Lacs for all contractual employees	11600	1700	197.20	11.83
4	Arranging of Covid Centers of 10 Beds Each, in South and West				
	Cost of Oxygen Concentrator	20	60000	12.00	0.72
	Cost of Oxygen Cylinder	20	450000	90.00	5.40
	2 Doctors	2	125000	2.50	0.15
	6 Nurses	6	25500	1.53	0.09
5	Medicines			10.00	0.60
6	Sanitizer (Lts)	4000	60	2.40	0.14
7	Masks	16000	15	2.40	0.14
8	PPE Kits	4000	300	12	0.72
9	Nitrile Hand Gloves (Pairs)	50000	13	6.50	0.39
10	Face Shield	4000	50	2	0.12
11	Tie up with Nursing Home with 14 Beds with all medication & Oxygen Supply South & West	28	450000	126.00	7.56
Total				~ 773.08	46.38

Note: 1. The above expenses are exclusive of applicable taxes. Details of actual expenses would be furnished at the time of true-up.

2. Expenses may increase based on the duration of COVID pandemic.

4. COLLECTION EFFICIENCY

- The **Business Plan Regulations, 2019** provides for a Collection Efficiency Target of 99.5%. However, the **Business Plan Regulations, 2019** was formalised in December 2019 pursuant to petitions filed for that purpose in October 21, 2019 much prior to the Covid-19 situation in India in general and Delhi in particular.

- Subsequent thereto, starting from March 2020, the entire country and more particularly Delhi have been in the midst of the Covid-19 pandemic which has been acknowledged far and wide as a force majeure event. This Hon'ble Commission has also been graciously pleased to recognise the same as a force majeure event.
- During this pandemic, the Central Government and the various State Governments have implemented a state-wide (and countrywide) lockdown in different phases with varying parameters.
- Further, in order to alleviate the problems of the Delhi consumers, this Hon'ble Commission was pleased to pass various directives and Orders. The resultant of the ongoing pandemic as also the Orders of this Hon'ble Commission, is that the Discoms' revenues and collections have fallen drastically. By reason of the aforesaid pandemic and the various Orders passed, the actual collection for the Petitioner was 63.1% in the months of April and May 2020.
- Delhi has continued the lockdown till 10th May 2021. However, it is impossible to predict and project whether the lockdown will be further extended, or curtailed or even perhaps depending upon the Covid-19 situation, even tightened once again.
- In this unprecedented situation it is also not possible to model what the economic scenario would be in the rest of the Financial Year.
- In case the lockdown is released or lifted on 10th May 2021, it is expected that the Collection Efficiency would return to levels closer to normal, even though not fully normal. However, if the lockdown is further tightened or re-introduced, the Collection Efficiency would drastically reduce again, for no fault of the Petitioner. Much would also depend upon the economic scenario post the resumption of normal business operations of the consumers. For example, it is expected that even if shopping malls etc. do open, their consumption etc. as also payments of electricity bills might not be at normal levels. During the continuance of such embargo there is absolutely no way of ensuring payment of electricity bills.
- Therefore, in this situation of extreme uncertainty, it is proposed that for the purpose of projecting the ARR, the Collection Efficiency across various categories of consumers are analysed discreetly as opposed to considering a unified collection efficiency applied globally for the entire consumer base of the Petitioner. This is particularly important now in the light of the economic slowdown caused by the resurgence of the COVID-19 pandemic. Accordingly, the Petitioner has considered the following Collection Efficiency across various consumer categories for FY 2021-22:
 - Domestic - 90%
 - Non Domestic - 70%
 - Industrial - 70%
 - Public Utilities - 90%

- Other categories – 99.5%

The above collection efficiencies are justified on account of the following reasons:

- 2nd COVID wave is unprecedented and cannot be linked with past performance
 - Substantially reduced paying capacity for all categories of consumers.
 - Significant closure of non-domestic and commercial units due to the ongoing curfew / lock-down in the NCT of Delhi.
 - Overall economic slowdown due to the pandemic
 - Financial hardship to small domestic and non-domestic consumers due to financial burden on account of cost of COVID-19 treatment.
 - Reduced frequency of operation for Public Utilities such as DIAL and DMRC.
 - Govt. utilities would have exhausted all their budget allocation for COVID and will have lesser amount for paying Electricity dues.
- It is also prayed that upon true up, the Collection Efficiency may be trued up on the basis of actual collection efficiency rather than on a normative level for this FY 2020-21 due to the current situation.
 - Taking the above into account, the weighted average Collection Efficiency is calculated to be 83.2% while revenue available towards ARR for FY 2021-22 is coming to Rs.6477.95 Cr.
 - It is also submitted that the Hon'ble Commission may be pleased to use its regulatory powers including but not limited to its power of relaxation available under the Regulations in this unprecedented and fluid situation to relax the rigour of the **Business Plan Regulations 2019** to the above extent.

Thus **Table-4-21 of Chapter-4 on Page 359** given in Petition for True-up of FY 2019-20 and ARR and Tariff of FY 2021-22 shall change as under:

Sl. No	Particulars	Amount (Rs. Cr.)
1	Additional O&M Expenses projected in Table-4-21	328
2	COVID related expenses	46
3	Total	374

5. WORKING CAPITAL AND ROCE:

Based on the above discussion, taking into account the revised Sales (MU), Revenue Billed (Rs. Cr.) and Power Purchase Cost (Rs. Cr.) figures, the following tables from **Chapter 4** of the Petition for True-up of FY 2019-20 and ARR and Tariff of FY 2021-22 shall change as under:

- a) **Table-4-25 of Chapter 4 on Page 363** i.e. Working Capital for FY 2021-22 to be replaced as below –

Sl. No.	Particulars	FY 2021-22 (Rs. Cr.)	Remarks
1	2	3	4
A	Receivables from sales of electricity	10,055	
B	Receivables equivalent to 2 months of revenue from wheeling charges and sale of electricity	1,676	(A)/ 12 X 2
C	Less: Net purchase expenses (incl. Transmission Charges)	7,372	
D	Less: One month power purchase expenses (incl. Transmission Charges)	614	(C)/12
E	Total Working Capital	1,062	(B-D)
F	Less: Opening Working Capital	805	TO dated 28.08.2020
G	Change in Working Capital	257	(E-F)

- b) **Table-4-26 of Chapter 4 on Page 363** i.e RRB for FY 2021-22 to be replaced as below –

Sl. No.	Particulars	FY 2021-22 (Rs. Cr.)	Remarks
A	Opening RRB (RRB _o)	5,062	
B	Change in RRB	250	(C-D-E)
C	Investment capitalised during the year (INV _i)	686	
D	Depreciation during the year (D _i)	355	
E	Consumer contribution during the year (CC _i)	81	
F	Change in working capital during the year (ΔWC _i)	257	Table 4-25
G	RRB Closing	5,569	A+B+F
H	RRB_i	5,444	A+B/2+F

- c) **Table-4-27 of Chapter 4 on Page 364** i.e. Equity & Debt for FY 2021-22 to be replaced as below –

Sl. No.	Particulars	FY 2021-22 (Rs. Cr.)	Remarks
1	2	3	4
A	Equity		
i.	Opening Equity	2,372	

Sl. No.	Particulars	FY 2021-22 (Rs. Cr.)	Remarks
1	2	3	4
ii.	Additions during the year	182	
iii.	Closing Equity	2,553	i+ii
iv.	Average Equity	2,462	iv=(i+iii)/2
B	Debt		
v.	Opening Debt	2,756	
vi.	Additions during the year	423.5	
vii.	Working Capital	257	Table 4-25
viii.	Repayment during the year	275.6	viii=v/10
ix.	Closing Debt	3,161	v+vi+vii-viii
x.	Average Debt	2,959	x=(v+ix)/2

- d) **Table-4-30 of Chapter 4 on Page 367** i.e WACC for FY 2021-22 to be replaced as below –

Sl. No.	Particulars	FY 2021-22 (Rs. Cr.)	Remarks
1	2	3	4
A	Avg. Equity	2,462	Table 4-27
B	Avg. Debt	2,959	
C	Total	5,421	(A+B)
D	Cost of Debt	12.27%	Table 4-29
E	Return on Equity	16%	
F	MAT Rate	17.47%	
G	Rate of RoE (pre-tax)	19%	E/(1-F)
F	Weighted Average Cost of Capital (WACC)	15.50%	((B/C)*D)+((A/C)*G)

- e) **Table-4-31 of Chapter 4 on Page 367** i.e. RoCE for FY 2021-22 to be replaced as below –

Sl. No.	Particulars	FY 2021-22 (Rs. Cr.)	Remarks
1	2	3	4
A	RRB (i)	5,444	Table 4-26
B	WACC	15.50%	Table 4-30
C	RoCE	844	(A*B)

- f) **Table-4-33 of Chapter 4 on Page 368** i.e. ARR for FY 2021-22 to be replaced as below –

Sl. No.	Particulars	FY 2021-22 (Rs. Cr.)	Remarks
1	2	3	4
A	Net Power Purchase Cost including Transmission and SLDC Charges	7,372	Table 4-15
B	O&M Expenses	1,240	Table 4-19
C	Additional O&M Expenses	374	Table 4-21
E	Depreciation	355	Table 4-23
F	Return on Capital Employed (RoCE)	844	Table 4-31
G	Sub-total	10,184	G= Sum (A to F)
H	Less: NTI	129	Table 4-32
I	Aggregate Revenue Requirement	10,055	I=G-H

- g) **Table-4-34 of Chapter 4 on Page 368** i.e. Revenue towards ARR for FY 2021-22 to be replaced as below –

Sl. No.	Particulars	FY 2021-22 (Rs. Cr.)
1	Revenue Billed	7,788
2	Collection Efficiency	83.18%
3	Revenue available towards ARR	6,478

- h) **Table-4-35 of Chapter 4 on Page 369** i.e. Revenue (Gap) for FY 2021-22 to be replaced as below –

Sl. No.	Particulars	FY 2021-22 (Rs. Cr.)	Remarks
A	ARR for FY 2021-22	10,055	Table 4-33
B	Revenue available towards ARR	6,478	Table 4-34
D	Revenue (Gap)/ Surplus	(3,577)	C=B-A