

For your kind consideration

The Hon'ble Commission vide its Email dated 11th May 2021 and subsequent email dated 28th May 2021 sought details on weekly & category wise sales for the month of April and May months of FY 19-20, FY 20-21 and FY 21-22.

The details as sought by the Hon'ble Commission on weekly and category wise sales for the month of April and May for last 3 years are enclosed at **Annexure 1**. As per our understanding, the above details are sought to assess the impact of lockdown/ second wave of COVID-19 on Energy Sales of the distribution licensee. The details submitted in Annexure 1 are summarized below in Table 1.

Table 1 – Summary of Weekly Energy Sales (MU)

Energy Sales (MU)	April			May		
Day of the month	FY 20	FY 21	FY 22	FY 20	FY 21	FY 22
1st- 7th day	7	0	0	27	-34	12
8th - 14th day	361	270	9	413	150	38
15th - 21st day	135	140	141	278	192	146
22nd - 28th day	222	156	401	272	177	438
29th - 30/31st day	108	140	244	172	189	254
Total	832	706	794	1,162	674	888

The above data depicts that no trend is established on the energy sales if compared on weekly basis. The major reasons of no specific trend on the weekly data are submitted below: -

1. **Impact of DERC Order** – During FY 2020-21, The Hon'ble Commission passed order dated 07.04.2020 and 04.05.2020 due to which energy sales were reduced in FY 2020-21. This has also directly affected the Billing cycle, Provisional bills and its reversals. The impact of the DERC order dated 07.04.2020 and 04.05.2020 is not limited to FY 2020-21 but also have direct and indirect impact on next year 2021 (as explained in detail in S.No. 4 & 5 below).
2. **Delay in subsidy order in the month of April** – Due to the delay in subsidy order and guidance from the GoNCTD on the extension of subsidy for the current year, the billing in April 2021 was deferred. This had a cascading effect on energy sales in rest of April 2021 due to which the energy sales are showing an increasing trend in balance period of April 2021 as compared to the previous financial years.
3. **Impact of Pre-Lockdown period due to fear of second wave of Pandemic**. – During the first wave of COVID-19, the peak of new confirmed cases was observed on 11th November 2020 having around 8500 cases. From 11th April 2021 onwards, Delhi reported more than 10000 on daily basis. This has created a sense of fear among the consumers and the energy consumption started declining due to voluntary restriction in hours of operation by the consumer and in many cases voluntary closure of commercial and industrial activities by the consumers.
4. **Provisional Bills** - The Provisional bills are served to consumers in case the DISCOM is not able to download the meter reading in a particular billing cycle. As per Supply Code 2017, the provisional

bills are served to the consumers on the consumption recorded during the corresponding period of previous year. In case the consumption during the corresponding period in the previous year is not available, the average consumption recorded during the preceding 3 billing cycle or lesser period is considered. In April and May 2020, due to the lockdown the distribution licensee served provisional bills to the consumers. Hence, during April 2021 and May 2021, the provisional bills served on the basis of average of last 3 billing cycle, where consumption is lesser as compared to the consumption done in April and May month in normal course of business.

5. **Provisional Bill Reversal** – In case provisional bills are served to the consumer during the preceding billing cycle(s) and in the current billing cycle meter reading was done. Energy billed in previous Provisional bill(s) served is deducted from the energy billed from the actual meter reading of the current month to arrive at the net energy billed for the month. In April 2020 and May 2020, no provisional reversal was passed and BRPL was not able to get the meter reading due to the lockdown. In FY 2020-21, the lockdown was imposed w.e.f. 19th April 2021, Hence, provisional reversal was passed to the consumers whose meter reading is recorded till 18th April 2021. It is also important to mention that the energy sales are on higher side due to serving of provisional bills and the same would be actualized when we are able to get the meter reading by passing the provisional reversal in the coming months.
6. **Gap between Bill date and consumption period** – The bill served on a particular date have consumption period of previous 35 to 40 days from the bill date in normal course of business. In year 2021, the lockdown was announced from 19th April 2021. Therefore, the impact of adverse impact on Energy Sales due to the lockdown would be visible from 22nd May 2021 onwards. However, the provisional bills are being served to the consumer(s) due to which the adverse impact in energy sales would be visible in the month where the actual meter reading was done.
7. **AMR actual reading** – The energy sales include the data corresponding actual consumption recorded through Automated meter reading (AMRs) as well as provisional bills where the meter reading is not available.
8. **Addition and deletion of consumer in due course** - New connection and disconnection of consumers also are one of the major factors in no specific trend on weekly energy sales. For example, consumers billed in second week of previous year might have disconnected which resulted into reduction in energy sales in second week in the current year. Similarly, it is possible that new consumers are added during the previous year which is billed in fourth week of current year due to which the energy sales in fourth week are increased.

Net Consumer growth as on 30 April of each FY is tabulated below

S. No.	Date	No. of Consumers
1	30 Apr 2019	25,62,247
2	30 Apr 2020	26,51,261
3	30 Apr 2021	27,33,339

We request the Hon'ble Commission to kindly consider the observations while arriving at any impact of lockdown and COVID-19 during FY 2021-22.

Further, we would like to bring to the kind notice of the Hon'ble Commission that even after the lockdown restriction were lifted by the Govt. of NCT of Delhi, the adverse impact of COVID-19 pandemic on energy sales would be evident for a long time. The Hon'ble Commission in its tariff order dated 28.08.2020 did not appreciate this fact and considered energy sales on the higher side based on assumption that things would normalise in H2 of FY 2020-21. The comparison of energy sales projected by the BRPL in ARR for FY 2020-21, Energy Sales approved by Hon'ble Commission and Actual Energy Sales for FY 2020-21 is tabulated below in Table 2.

Table 2 – Comparison of energy sales ARR Petition vs DERC Approved vs actual for FY 2020-21

FY 20-21	UOM	Energy Sales
As per revised ARR petition dated 04.06.2020	MU	11178
As per Tariff Order dated 28.08.2020	MU	11833
Actual sales as on 31.03.2021	MU	11077

In view of the above, BRPL would like to request the Hon'ble Commission to kindly consider Energy sales as per revised ARR projections considering impact of COVID-19 pandemic (second wave) for FY 2021-22 submitted vide its letter no. Ref: RA/2021-22/01/A/074 dated 06.05.2021.