



**BSES Rajdhani Power Limited**

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Ref: RA/2020-21/01/A/ 71

June 4, 2020

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

**Sub.: Petition No. 01 of 2020 - Truing up of Expenses up to FY 2018-19 and Aggregate Revenue Requirement for FY 2020-21 ("ARR Petition")**

**Ref.: Hon'ble Commission's letter dated 14.01.2020  
BRPL's letter dated 14.02.2020  
Hon'ble Commission's letter dated 20.05.2020  
BRPL's letter dated 29.05.2020  
Hon'ble Commission's letter dated 01.06.2020**

Sir,

We refer to the aforementioned subject matter.

We had filed our petition for truing up of expenses upto FY 2018-19 on 06.12.2019 and ARR for FY 2020-21 on 14.02.2020. Both the True-up petition and ARR Petition were admitted by the Hon'ble Commission vide its order dated 20.02.2020. Public Hearing was scheduled on 18.03.2020. However due to Covid-19 outbreak, the public hearing got postponed.

The Hon'ble Commission vide its letter dated 20.05.2020 had asked us to file our revised/amended petitions on account of the changed circumstances due to Covid-19. Vide our letter dated 29.05.2020, we had requested the Hon'ble Commission to grant 2 weeks' time to submit the revised petitions.

The Hon'ble Commission, however, vide its letter dated 01.06.2020 has asked us to file the revised petitions by 05.06.2020. We are therefore submitting our revised/amended petition, pertaining to the ARR of FY 2020-21. It is respectfully submitted that the principles of natural justice require that the present petition be listed for a hearing so that we are able to present our case before the Hon'ble

Commission with respect to each and every issue contained in the ARR Petition and to explain the legal, regulatory, commercial, financial, technical and accounting principles in relation thereto.

We further sincerely urge that apart from technical validation sessions that the Hon'ble Commission may hold in relation to the figures presented in the petition, the Hon'ble Commission may kindly grant us an opportunity to be heard in person on each and every issue contained in the ARR Petition and rationale supporting the same.

Kindly acknowledge receipt.

Thanking you,

Yours faithfully

***For BSES Rajdhani Power Ltd.***



**Ravi Shandilya**

Senior Manager – Regulatory

**Attachments:**

1. Revised/Amended Petition – ARR for FY 2020-21
2. Affidavit



**REVISED**  
**PETITION FOR**  
Aggregate Revenue Requirement  
for FY 2020-21

**BSES**  
BSES Rajdhani Power Limited

**BEFORE THE DELHI ELECTRICITY REGULATORY COMMISSION  
C BLOCK, SHIVALIK, MALVIYA NAGAR, NEW DELHI**

**PETITION NO. 01 OF 2020**

**IN THE MATTER OF:-**

**BSES Rajdhani Power Limited**

BSES Bhawan, Nehru Place

New Delhi-110 019

..... **PETITIONER**

**AND**

**IN THE MATTER OF:-** Annual Tariff Petition and Tariff for FY 2020-21 under Section 62 of the Electricity Act, 2003 read with Regulation 11 & 12 and other relevant provisions under DERC Tariff Regulations, 2017 and the Delhi Electricity Regulatory Commission Business Plan Regulations, 2019 (hereinafter referred to as “**Business Plan Regulations, 2019**”) and also under Sections 11 and 28 of Delhi Electricity Reforms Act 2000 to the extent applicable, the Delhi Electricity Regulatory Commission (Conduct of Business) Regulations, 2001 and Condition 24 of the License for Distribution and Retail Supply of Electricity issued by the Hon’ble Commission.

**AND**

**IN THE MATTER OF:-** The Hon’ble Commission’s letters dated 20.05.2020 and 01.06.2020 seeking revision/amendment in the ARR for FY 2020-2021.

**REVISED/AMENDED TARIFF PETITION FOR FY 2020-21**

**RESPECTFULLY SHEWETH:**

1. BSES Rajdhani Power Limited (hereinafter referred to as “**the Petitioner/ BRPL**”), a company incorporated under the Companies Act, 1956, and having its registered office at BSES Bhawan, Nehru Place, New Delhi – 110019, is a license holder for carrying on the business of Distribution and Retail Supply of electrical energy within the Area of Supply as specified in the “*License for Distribution and Retail Supply of Electricity*” issued by the Hon’ble Commission.



2. In accordance with the Electricity Act, 2003 (hereinafter referred to as “**the 2003 Act**”), the License conditions, DERC Business Plan Regulations, 2019, DERC Tariff Regulations, 2017, and DERC MYT Regulations 2011 and 2007, the Petitioner is required to file the Annual Tariff Petition for FY 2020-21 (hereinafter collectively referred to as the “**ARR/ ARR Petition**”). Since the DERC Business Plan Regulations, 2019 were notified by the Hon’ble Commission in December 2019, the Hon’ble Commission vide its letter dated 30.12.2019 directed the Petitioner to submit the ARR & Tariff Petition for FY 2020-2021 based on the DERC Business Plan Regulations, 2019. The Hon’ble Commission vide its letter dated 14.01.2020 stated that the timeline for submission of ARR and Tariff Petitions for FY 2020-21 is extended upto 15.02.2020.
3. The Petitioner filed its petition for ARR for FY 2020-21 on 14.02.2020. The Petition for true-up of expenses upto FY 2018-19 was filed earlier on 06.11.2019.
4. The Hon’ble Commission vide its order dated 20.02.2020 admitted both the True-up Petition and ARR Petition. A public hearing was scheduled on 18.03.2020. However, due to outbreak of the COVID-19 pandemic, the public hearing got postponed.
5. Thereafter, the Hon’ble Commission vide its letter dated 20.05.2020 asked the Petitioner to file its revised/amended petition on account of the changed circumstances due to COVID-19. The Petitioner vide its letter dated 29.05.2020 requested the Hon’ble Commission to grant 2 weeks’ time to submit its revised/amended petition. The Hon’ble Commission, however, vide its letter dated 01.06.2020 directed the Petitioner to file its revised/amended petition by 05.06.2020.
6. The Petitioner is therefore submitting its revised/amended petition pertaining to the ARR of FY 2020-21. It is respectfully submitted that the revised/amended Petition pertains only to Chapters 4 and 5. In other words, of the Petition filed earlier, only Chapters 4 and 5 have undergone a change and are being revised/amended as such. The remainder of the Petition remains the same as before except insofar as any consequential change that may have to be read in on account of the changes in Chapters 4 and 5.
7. It is respectfully submitted that the Hon’ble Commission is mandated in law, to decide the present revised ARR Petition in a manner ensuring timely recovery of

all costs so that ultimately the consumers do not have to bear the burden of avoidable carrying cost on those amounts and costs that are not passed through in the retail tariffs on a regular basis. Similarly, given the extraordinary circumstances, allowing the ARR on an urgent basis is pivotal for the Petitioner to, as far as possible: (a) meet its power purchase costs and other uncontrollable costs; (b) meet its performance standards, (c) comply with various directives specified by the Hon'ble Commission, which particularly entail expenditure.

8. The Petitioner in the present revised ARR Petition has made certain assumptions in relevant sections, and has endeavoured to comply with the various applicable legal and regulatory directions of the Hon'ble Commission.
9. The Petitioner is filing the present Petition to ensure prompt determination of tariff as to seek the ARR and Tariff for FY 2020-21. Though the Petitioner has made all efforts and has tried diligently to ensure the filing of a comprehensive Petition, it may be possible that some aspects/components/claims have not been dealt in detail and/or may have been inadvertently omitted. It is submitted that such inadvertent omission/deficiency, if any, would not amount to any waiver of any entitlement/claim by the Petitioner. The Petitioner craves leave of this Hon'ble Commission and reserves its rights to supplement the present Petition with additional facts, additional affidavits, additional submissions and claims, if any.
10. The Licensee sincerely urges that apart from technical validation sessions that the Hon'ble Commission may hold in relation to the figures presented in the petition, the Hon'ble Commission may, in the interest of justice and keeping in mind the principles of natural justice, kindly grant full opportunity to be heard in person on each and every issue contained in the ARR Petition so as to explain the legal, regulatory, commercial, financial, technical and accounting principles in relation thereto.
11. The filing of the Petition should not be treated as curtailing any right or claim of the Petitioner, which it is permitted to recover in terms of its License and Orders of the Hon'ble Commission, Hon'ble Appellate Tribunal for Electricity (including the principle of parity / equality in treatment of Discoms) and or any other proceedings relevant to the entitlement of the Petitioner.



**PRAYERS:**

12. In view of the above, the Petitioner most respectfully prays that the Hon'ble Commission may be pleased to:
- A. Take the present revisions/amendments to the ARR Petition on record;
  - B. Consider these revisions/amendments as a part of present Petition, namely, Petition No. 01 of 2020 and allow Petition No. 01 of 2020 accordingly; and
  - C. Approve the ARR as submitted in Chapter- 4 and Tariff as submitted in Chapter- 5 for FY 2020-21; and
  - D. Approve the power purchase cost as per Para 4.95 in Chapter 4; and
  - E. Increase allocation from cheap stations i.e. Sasan, Rihand, Singrauli etc. to the Petitioner and decrease allocation from costly stations i.e. PPCL (Bawana), Dadri-I, Dadri-II, GT and APCPL-Jhajjar.
  - F. Approve amortization of the accumulated Revenue Gaps (Regulatory Asset) up to FY 2018-19 and carrying cost thereof through a surcharge as submitted in Chapter - 5; and
  - G. Allow the O&M Expenses and additional O&M expenses as sought in Chapter 4 of ARR for FY 2020-21.
  - H. Not hold the Petitioner liable for any penalty on account of variation in projected vis-a-vis trued up capitalization by more than 10% during the year considering the Covid-19 pandemic as Force majeure condition.
  - I. Give effect to the Hon'ble Commission's Order dated 13.12.2019 in Review Petition No. 30 of 2018; and
  - J. Allow additions / alterations / changes/ modifications to the petition and permit the Petitioner to place on record any developments/ facts/ documents that come to the knowledge of the Petitioner at a future date; and
  - K. Condone any inadvertent omissions/ errors/ rounding off difference/ shortcomings; and
  - L. Pass any order or further order/s and grant any other relief which this Hon'ble Commission may deem fit and proper in the facts and circumstances of the case.

Prayed accordingly



Petitioner

Through:

Ravi Shandilya

Senior Manager - Regulatory

Authorized Signatory

BSES Rajdhani Power Limited



## List of Abbreviations

Abbreviation	Full Form
AAD	Advance Against Depreciation
ABR	Average Billing Rate
AFC	Annual Fixed Charges
A & G	Administrative & General
AMR	Automated Meter Reading
APCPL/ APCL	Aravali Power Company Private Limited/ Aravali Power Corporation Limited
APTEL	Appellate Tribunal for Electricity
ARR	Aggregate Revenue Requirement
BRPL	M/s BSES - Rajdhani Power Limited
BTPS	Badarpur Thermal Power Station
CAPEX	Capital Expenditure
CEA	Central Electricity Authority
CERC	Central Electricity Regulatory Commission
CGHS	Co-operative Group Housing Societies
CGS	Central Generating Stations
ckt. km	Circuit kilometer
CMS	Central Monitoring System
COD	Commercial Operation Date
COVID-19	Coronavirus Disease of 2019
CPI	Consumer Price Index
CTPS	Chandrapura Thermal Power Station
DERC	Delhi Electricity Regulatory Commission
DIAL	M/s. Delhi International Airport Limited
DISCOM	Distribution Company
DJB	M/s. Delhi Jal Board
DMRC	M/s Delhi Metro Rail Corporation
DMS	Document Management System
DT	Distribution Transformer
DTC	Delhi Transport Corporation
DTL	M/s Delhi Transco Limited
DSM	Demand Side Management
DVC	M/s Damodar Valley Corporation
EV	Electric Vehicle
FY	Financial Year
GENCO	Generation Company
GFA	Gross Fixed Assets

## BSES RAJDHANI POWER LIMITED

Abbreviation	Full Form
GoNCTD	Government of National Capital Territory of Delhi
Grid S/s	Grid Sub-station
GST	Goods and Service Tax
GT	Gas Turbine
hrs	hours
HT	High Tension
IPGCL	M/s Indraprastha Power Generation Co. Ltd
ISGS	Inter-State Generating Stations
IT	Information Technology
Kms	Kilo Meters
kV	Kilo Volt
kVA	Kilo Volt Ampere
kW	Kilo Watt
kWh	Kilo Watt Hour
KYC	"Know Your Customer" details of consumers
Lockdown	Emergency protocol implemented by the authorities that prevents people from leaving a given area.
Lockdown 1	Nationwide Lockdown till March 14, 2020
Lockdown 2	Nationwide Lockdown from March 15, 2020 upto May 03, 2020
Lockdown 3	Nationwide Lockdown from May 04, 2020 upto May 17, 2020
Lockdown 4	Nationwide Lockdown from May 18, 2020 upto May 31, 2020
Lockdown 5	Nationwide Lockdown from June 01, 2020 upto June 30, 2020
LPSC	Late Payment Surcharge
LT	Low Tension
MCLR	Marginal Cost of Fund based Lending Rate
MOD	Merit Order Despatch
MoHA	Ministry of Home Affairs, Government of India
MoP	Ministry of Power
MSW	Municipal Solid Waste
MU	Million Units
MVA	Million Volt Ampere
MW	Mega Watt
NCT	National Capital Territory
NCTPS	National Capital Thermal Power Station
NHPC	M/s National Hydroelectric Power Corporation Ltd.
NPCIL	M/s Nuclear Power Corporation India Limited
NTI	Non-Tariff Income
NTPC	M/s National Thermal Power Company Ltd.
O&M	Operation and Maintenance
p.a.	per annum

## BSES RAJDHANI POWER LIMITED

Abbreviation	Full Form
PFC	M/s. Power Finance Corporation
PGCIL	M/s Power Grid Corporation of India Limited
PLF	Plant Load Factor
POSCO	Power System Operation Corporation Limited (National Load Dispatch Centre)
PPA	Power Purchase Agreement
PPCL	M/s Pragati Power Corporation Ltd.
PPE	Personal Protective Equipment
PTC	Power Trading Corporation
Q1FY	First Quarter of the Financial Year from 1 <sup>st</sup> April to 30 <sup>th</sup> June.
Q2FY	Second Quarter of the Financial Year from 1 <sup>st</sup> July to 30 <sup>th</sup> September
Q3FY	Third Quarter of the Financial Year from 1 <sup>st</sup> October to 31 <sup>st</sup> December
Q4FY	Fourth Quarter of the Financial Year from 1 <sup>st</sup> January to 31 <sup>st</sup> March
RAPP	Rajasthan Atomic Power Project
R & M	Repair and Maintenance
RE	Renewable Energy
REC	Renewable Energy Certificates
REC	Rural Electrification Corporation
RoCE	Return on Capital Employed
RPH	Rajghat Power House
RPO	Renewable Purchase Obligation
RRB	Regulated Rate Base
Rs.	Indian Rupees
Rs. Cr.	Indian Rupees in Crores
SBI	State Bank of India
SECI	Solar Energy Corporation of India Limited
SGS	State Generating Stations
SJVNL	M/s Satluj Jal Vidyut Nigam Limited
SLDC	State Load Despatch Centre
SMS	Short Message Service
SPA	Sanitas Per Aquam means "Health by or through water"
STPS	Super Thermal Power Station
THDC	Tehri Hydro Development Corporation Ltd.
TPS	Thermal Power Station
TOWMCL	Timarpur-Okhla Waste Management Company Ltd.
UMPP	Ultra Mega Power Project
VC	Variable Cost
WACC	Weighted Average Cost of Capital
WPI	Whole Sale Price Index

## Chapter – 4



**ARR FOR FY 2020-21**

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## ARR of FY 2020-21

### Background

4.1 On January 31, 2017, the Hon'ble Commission notified DERC (Terms and Conditions for determination of Tariff) Regulations, 2017 (hereinafter "**Tariff Regulations, 2017**").

4.2 Clause-3 and 4 of the Tariff Regulations, 2017 states as under:

"....

3. *The Commission shall notify Business Plan Regulations for each Control Period based on the Business Plan submitted by the Utility which shall be read as part of these Regulations.*
4. *The Business Plan Regulations shall contain the following parameters applicable for a Control Period:*
  1. *Rate of Return on Equity,*
  2. *Margin for rate of interest on loan,*
  3. *Operation and Maintenance Expenses,*
  4. *Capital Investment Plan,*
  5. *Mechanism for sharing of incentive-disincentive mechanism,*
  6. *Allocation of overhead expenses incurred on account of Administrative expenditure out of Operation and Maintenance Expenses for creation of Capital Assets,*
  7. *Generating Norms:*
    - a. *Gross Station Heat Rate,*
    - b. *Plant Availability Factor,*
    - c. *Secondary Fuel Oil Consumption,*
    - d. *Auxiliary Consumption and*
    - e. *Plant Load Factor,*
  8. *Transmission Norms:*
    - a. *Annual Transmission System Availability,*
    - b. *Annual Voltage wise Availability*
  9. *Distribution Norms:*
    - a. *Distribution Loss Target,*
    - b. *Collection Efficiency Target,*
    - c. *Targets for Solar and Non Solar RPO,*
    - d. *Contingency Limit for Sale through Deviation Settlement Mechanism (Unscheduled Interchange) Transactions,*
    - e. *The ratio of various ARR Components for segregation of ARR into Retail Supply and Wheeling Business.*

....."

4.3 On December 27, 2019, the Hon'ble Commission notified DERC (**Business Plan**) Regulations, 2019 (hereinafter "**Business Plan Regulations, 2019**") which are applicable for a period of 3 years, i.e., FY 2020-21, FY 2021-22 and FY 2022-23. Business Plan Regulations, 2019 contain the trajectory for various controllable parameters to be followed during FY 2020-21 to FY 2022-23.

4.4 Regulation-11 of Tariff Regulations, 2017 states as under:

*"11. The Distribution Licensee shall submit Annual Tariff Petition, at least, one hundred and fifty (150) days prior to the end of relevant financial year which shall contain:*

- 1. Sales forecast for the ensuing year and audited sales for previous year on monthly basis as prescribed in the Appendix-2;*
- 2. Expected revenue to be billed for the ensuing year and audited Revenue Billed and Realised for previous year as prescribed in Appendix-2;*
- 3. Power Procurement Quantum & Cost for ensuing Year and audited Power Purchase Quantum & Cost for previous Year on monthly basis indicating Long Term and Short Term, Renewable Energy Purchase and other applicable Charges as prescribed in the Appendix -2:  
Provided that the Distribution Licensee shall propose the indicative cost of power procurement taking into account revenues from Short term sale of Surplus Power and maximum normative rebate available from each entity;  
Provided that the Renewable Purchase Obligation of the Distribution Licensee as per the Delhi Electricity Regulatory Commission (Renewable Purchase Obligation and Renewable Energy Certificate Framework Implementation) Regulations, 2012 as amended from time to time shall be part of the Distribution Licensee's Power Procurement Cost;*
- 4. Actual and Expected intra- State & inter-State Transmission Loss & Charges including Load Dispatch Charges, Open Access Charge indicating maximum normative rebate available from each entity for the previous and ensuing Year respectively:  
Provided that the Distribution Licensee shall propose Wheeling Charges in case the distribution network of other Distribution Licensee is used for procurement of power for the Retail Supply Business;*
- 5. Actual and Expected amount on account of Cross-Subsidy Surcharge and Additional Surcharge to be received by the Licensee, as approved*

*by the Commission from time to time in accordance with the Delhi Electricity Regulatory Commission (Terms and Conditions of Open Access) Regulations 2005 as amended from time to time, shall be indicated separately against the consumer category by the Distribution Licensee;*

6. *Actual Voltage wise Distribution Loss and Collection Efficiency for the previous Year;*
7. *Energy Audit Report of distribution network of the Distribution Licensee for previous Year by certified energy auditor from Bureau of Energy Efficiency;*
8. *Monthly Energy Balance for the ensuing & previous Year;*
9. *Actual and Expected additional Expenses on account of O&M beyond the Control of Distribution Licensee for the ensuing & previous Year respectively;*
10. *Actual and Expected Capitalisation and Depreciation Schedule for the previous and ensuing Year respectively;*
11. *Actual and Expected Non-Tariff Income including Other Business Income for the previous and ensuing Year respectively;*
12. *Actual weighted average rate of interest on loan."*

4.5 The Hon'ble Commission has finalised the Business Plan Regulations, 2019 and uploaded the same on its website on December 27, 2019.

However as will be evident in the submissions of this Petition, the said Regulations were framed in a pre-Covid-19 scenario and may have to be relaxed or modulated by this Hon'ble Commission in the post Covid-19 pandemic scenario.

4.6 Accordingly, the Petitioner had submitted its Aggregate Revenue Requirement (ARR) and Tariff Petition for FY 2020-21 on February 14, 2020 and requested the Hon'ble Commission for determination of tariff for FY 2020-21.

4.7 The Hon'ble Commission on May 20, 2020, cognizant of the COVID-19 situation and its aftershocks, was pleased to grant the Petitioner the opportunity to file its revised Tariff Petitions for the ARR of FY 2020-2021 in view of the Force Majeure Conditions due to COVID-19 pandemic and its consequent impact including but not limited to the nationwide lockdown. Accordingly, the Petitioner is filing the present Petition keeping in mind the changes that have had to be made on

account of the COVID-19 situation. However, it must be borne in mind that the full extent of the implications of the COVID-19 pandemic are still not entirely known. While it is expected and hoped that in the coming months, the situation would improve and the situation would slowly move back to normal, the possibility of the pandemic getting worse requiring more stringent legal and administrative measures, cannot be completely ruled out. It is therefore prayed that the present Petition be read and understood with the following broad caveats:

- a) The full extent of the implications of COVID-19 are not yet known. There is a possibility that the assumptions made in the present Petition (or for that matter the tariffs determined on such basis) may have to be revisited again once things become clearer;
- b) The possibility of the situation worsening also cannot be ruled out, which would again require revisiting the assumptions made in the present Petition;
- c) The present situation being unprecedented in nature, there is no material or data available to the Petitioner in terms of basis or guidance upon which to base its projections. Therefore, the revisions made herein are done to the best of the Petitioner's ability keeping in mind the limited changes that have been witnessed since March 2020 till date.

### **Force Majeure Conditions due to COVID-19 Pandemic and its Consequent impact including but not limited to the nationwide Lockdown**

#### **Restriction imposed in the NCT of Delhi and Lockdown Orders:**

4.8 The outbreak and rapid spread of novel Corona Virus ("COVID-19") pandemic started affecting business as usual conditions from the second week of March 2020. In this regard several mandatory directives having the force of law were issued, both at the State and the Central level which have had a significant impact. Some of the key directives issued are as under:

- On March 12, 2020 Government of NCT of Delhi ("GoNCTD") in order to curb the COVID-19 pandemic, notified the Delhi Epidemic Diseases, COVID-19 Regulations, 2020 bearing No. F.51/DGHS/PH-IV/COVID-19/202-215. By the said Regulations, GoNCTD imposed various restrictions and framed Guidelines in its effort to contain the outbreak of COVID-19.
- Thereafter on March 16, 2020 GoNCTD by Notification F.51/DGHS/PH-IV/COVID-19/2020/M/PRSECYFW/2447-61 directed the closure of various establishments like Cinema Halls, Gyms, Spa Centres, Night Clubs, Schools, Colleges, Weekly Bazaars and severely restricted (if not completely prohibited) other conferences and mass gatherings.

- On March 22, 2020 GoNCTD by Order bearing No. F.51/DGHS/PH-IV/COVID-19/2020/M/PRSECYHFW/3064-3163 directed for a Lockdown in the NCT of Delhi, in terms of which GoNCTD:
  - (i) Notified a lockdown from March 23, 2020 (0600 hrs) till March 31, 2020 (Midnight) in the NCT of Delhi,
  - (ii) Stipulated various restrictions, inter alia, including (i) No public transport services including operation of private buses, taxi, rickshaws and e-rickshaws etc. shall be permitted. Only DTC buses shall operate at not more than 25% capacity to cater to personnel engaged in essential services, (ii) All Shops & commercial establishments, factories, workshops, offices, godowns, weekly bazaars, etc. shall close their operations, (iii) Borders to be sealed, (iv) Busses/metro to be suspended, (v) Domestic/ international flights to be suspended, (vi) Construction activity to be suspended, (vii) No congregation of more than 5 people.
  - (iii) Provided that Electricity services will be excluded from the purview of the Order. Various other essential services/ establishments are also excluded from the purview of the Order.
- On March 24, 2020 the Ministry of Home Affairs, Government of India (“**MoHA**”), by an Order directed nationwide Lockdown till April 14, 2020 (“**Lockdown 1**”).
- By Order dated April 15, 2020, **MoHA** further extended the Lockdown upto May 03, 2020 (“**Lockdown 2**”). Thereafter on May 01, 2020 **MoHA** by an Order issued new Guidelines for Lockdown till May 17, 2020 (“**Lockdown 3**”).
- On May 17, 2020 **MoHA** by an Order issued new Guidelines for Lockdown till May 31, 2020 (“**Lockdown 4**”). Thereafter on May 30, 2020 **MoHA** by an Order issued new Guidelines for Lockdown till June 30, 2020 (“**Lockdown 5/ Unlock-1**”).

#### Communications to Hon’ble Commission:

4.9 Meanwhile, the Petitioner on account of the spread of the pandemic and the steps taken by the GoNCTD and MHOA to prevent the spread of COVID -19, had issued communications dated March 18, 2020 and March 24, 2020 to the Hon’ble Commission inter alia requesting the Hon’ble Commission to:

- Declare the outbreak of COVID-19 Virus as a “**Force Majeure**” event, being not attributable to Petitioner and beyond the control of the Petitioner and issue necessary directions/ clarifications/ instructions so as to ensure and assist the Petitioner in providing continuous and reliable supply of electricity within Petitioner’s area of supply.
- Acknowledge and grant “**ex post facto**” approval of the steps already initiated and necessitated on account of outbreak of the COVID-19 Virus and attendant situation.
- Relax and / or revise the target for 99.5% Collection Efficiency for FY 2019-20.
- Relax and keep in abeyance the timeframe and the processes stipulated under the provisions of the Electricity Act, 2003, the Rules and Regulations framed thereunder, and other extant Directions issued by the Hon’ble Commission till the situation normalizes.

- 4.10 The Hon'ble Commission by a communique' dated March 25, 2020 (via. Whatsapp), suspended the DERC (Supply Code and Performance Standards) Regulations, 2017 during the Force Majeure conditions as per applicable Orders of GoNCTD and/or the Central Government.
- 4.11 On April 03, 2020 another communication was issued by the Petitioner requesting the Hon'ble Commission to issue various directions and recognise the steps being taken by the Petitioner to mitigate the losses and ensure uninterrupted and reliable power supply.
- 4.12 On April 07, 2020, the Hon'ble Commission by a Suo-Moto Order:
- Acknowledged that the prevalent situation due to outbreak of COVID-19 has led to complete shutdown of a number of commercial and industrial establishments on account of the lockdown declared and enforced by the Government (except essential services). Due to this the cash flow in the value chain may be temporarily impeded.
  - Considering the submissions of the Delhi Distribution Licensees and recognizing the gravity and unprecedented nature of the current situation, in exercise its powers to address the hardships being faced by electricity stakeholders at this juncture and in exercise of its power conferred under Regulations 168 & 172 of the DERC Tariff Regulations, 2017 and Regulations 84 & 85 of the DERC (Supply Code and Performance Standards) Regulations, 2017 had issued certain directions to the utilities including:
    - (ii) Payments made by the Delhi Distribution Licensees to Delhi GENCOs viz. IPGCL & PPCL and Delhi Transco Ltd beyond 60 days from the date of the presentation of the bills falling between 24.03.2020 and 30.06.2020, the concerned DISCOMs shall make the payment with LPSC at the reduced rate of 12% per annum that translates into 1% per month. Such LPSC shall not be pass through in ARR. **[Para 10(a)]**
    - (iii) The beneficiaries of Delhi GENCOs and Delhi Transco Ltd. shall avail rebate under Regulation 138 of DERC Tariff Regulations, 2017. **[Para 10(b)]**
    - (iv) Restricted LPSC lower of actual cost of working capital loan or 12% p.a., for the bills raised during the period 24.03.2020 till 30.06.2020. LPSC in any case not to be more than 12% p.a. and be charged for the number of days of delay in receiving payment from the consumer. **[Para 10 (c)]**
    - (v) Due date extended for bills raised during the period 24.03.2020 till 30.06.2020, by further two weeks over and above the scheduled due date without any LPSC. Bills raised for this purpose shall have last date of the extended period 30.06.2020 **[Para 10(d)]**.
    - (vi) Moratorium on Fixed Charges for next three billing cycles from 24.03.2020, to Public utilities, Industrial and Non-Domestic Tariff Categories. Fixed Charges accumulated over the said period be spread over next three billing cycles after 30.06.2020 without any LPSC. Further, consumers of these categories, who



desire so, may pay Fixed Charges for the bills raised during the period starting from 24.03.2020 to 30.06.2020. [Para 10 (e)]

- (vii) DISCOMs shall defer annual review of Sanctioned Load/ Contract Demand and submit self-certified quarterly forms/statements as directed in the Commission's Tariff Order dated 31/07/2019 for the quarters – Q4FY20 & Q1FY21. [Para 10 (f)]
- (viii) Approve a Rebate Scheme for all consumers for the actual/provisional bills raised during the period of March 24, 2020 till June 30, 2020: **[Para 10 (g)]**
  - Payment in Day 1-7 of the Billing Date: 1.0% of the Bill amount (excluding arrears if any) or Rs 200 (whichever is lower)
  - Payment in Day 8-14 of the Billing Date: 0.5% of the Bill amount (excluding arrears if any) or Rs 150 (whichever is lower)
  - No rebate /if the consumer is making part payment
  - Additional rebate of Rs 20 per bill shall be provided to the consumer if the consumer furnishes the meter reading(s) himself
- (ix) The above-mentioned Rebate Scheme shall be applicable on the net amount to be paid by the consumer.
- (x) The DISCOMs to bear all expenses of banking charges/processing fee/convenience fee, if any, for all modes of digital payments up-to Rs. 10,000/- against the bills raised during the period of March 24, 2020 till June 30, 2020. **[Para 10 (h)]**
- (xi) Electricity Bills may be raised on provisional basis in respect of consumers not covered under Smart Meters and Automatic Meter Reading. **[Para 10 (i)]**
- (xii) In addition to physical copy, the Electricity Bills, actual or provisional, shall also be sent to consumers through electronic mode viz. E-mail, SMS and WhatsApp etc. **[Para 10 (j)]**

4.13 On April 15, 2020, the Petitioner issued a communication to the Hon'ble Commission detailing its concerns, comments and observations on the Suo -moto Order dated April 07, 2020 and requested the Hon'ble Commission to reconsider its Suo- moto Order and:

- Advise GoNCTD, to release Subsidy directly to the Petitioner instead of being adjusted in favour of the Delhi Power Utilities (IPGCL, PPCL and DTL) to meet the Petitioner's operating expenses and prioritizing payments;
- Allow moratorium for the bills presented by Delhi Utilities after March 24, 2020 for a period of three months after the due date (i.e., credit period of 60 days) without any levy of any LPSC;
- Grant a moratorium for the payment of the capacity charges of the Delhi Generation Utilities for a period of 3 months, i.e. till June 30, 2020.
- The provision for considering the normative rebate as part of Non-Tariff Income in accordance with Regulation 138 of DERC Tariff Regulations, 2017 be relaxed during the present Force Majeure conditions and Para 10(b) of the Order dated April 07, 2020 may be suitably modified to that extent;

- Charges on digital payments upto Rs.10000/- may be allowed as an additional O & M expense while truing up the financials of the Petitioner for FY19-20 and for the relevant/ subsequent FY. Further, if there are any savings that would accrue to the Petitioner on this account, then the Petitioner would pass on the benefit of such savings to consumers.

4.14 On May 04, 2020, the Hon'ble Commission had issued "*Delhi Electricity Supply Code and Performance Standards (Relaxation) Third Order, 2020*" ("**Relaxation Order**"). The Relaxation Order dated April 07, 2020 was made applicable from March 24, 2020. By the said Relaxation Order, Hon'ble Commission had directed as under:

"...

*(1) For industrial and non-domestic category of electricity consumers the provisional billing shall be resorted to only in those cases where the meter of the consumer could not be read/ recorded by the distribution licensee during the billing cycle, otherwise the distribution licensee shall raise the bill based on actual consumption of electricity recorded by the meter.*

*(2) The distribution licensee shall raise such provisional bill for the fixed charges and associated applicable charges only, considering the energy consumption as nil.*

*(3) Where the provisional bill for such category of electricity consumers from 24.03.2020 has not been raised by distribution licensee as per para (2) above, the distribution licensee shall revise the bill in accordance with para (2) above.*

*(4) In case the consumer furnishes the meter reading(s) himself along with the picture of the meter indicating the meter reading and date of meter reading through registered mobile or through e-mail, the billing for that billing cycles(s) shall be done based on that/those reading(s) subject to adjustment when meter is actually read/recorded by the distribution licensee.*

*(5) The other terms and conditions of Order dated 07.04.2020 shall remain the same...."*

**Impact of the Force Majeure Conditions including the consequent Lockdown and Orders passed by the Hon'ble Commission:**

4.15 Admittedly, since March 23, 2020 Lockdown has been imposed across the license area of the Petitioner as well as the whole country. The lockdown has since then been successively extended by the MoHA and GoNCTD and continues till date. This lockdown scenario has been unprecedented for all concerned stakeholders

including the Petitioner and its implications are not yet fully known or realised. As such, the impact of the lockdown on the business of the Petitioner is ongoing with the Petitioner being uncertain at this time, as to the extent and duration of the present pandemic and lockdown conditions. However, it is pertinent to highlight that since the commencement of the lockdown, there has been an unprecedented change in the nature of the power distribution business for the Petitioner due to a variety of reasons, but not limited to:

**Consumption Pattern:**

- Due to the lockdown, various restrictions have been imposed on private, public and governmental offices, requiring a substantial section of employees to work from home as such. As such substantial majority of the population has remained at home and has even worked from home, due to which consumption pattern for the Domestic category has been on the increase.
- The Lockdown restrictions have caused a substantial surge and variation in load requirements of Domestic Consumers during the day as compared to business as usual conditions. The Load and Demand pattern for Domestic consumers is typically high during early morning and late night hours. However, at present there is higher than usual demand throughout the day (instead of the usual morning and night hours).
- Commercial Operations and Units, big or small have been shut during successive Lockdowns resulting in a massive drop in consumption under non-domestic category.
- Industrial units have been shut from the very first Lockdown 1.0 and most of them continue to remain shut as of today, resulting in an unprecedented drop in consumption under Industrial category.
- Public utilities and enterprises such as DIAL and Delhi Metro Rail Corporation have also been shut since Lockdown 1.0. DIAL w.e.f. May 25, 2020 have started operation from one terminal and the other two terminals are still under closure. Delhi Metro Rail Corporation continues to remain inoperative.
- Chart detailing the shift and variation in demand of all consumers during the months of April 2020 and May, 2020 as compared to the corresponding period last year is shown below:

## BSES RAJDHANI POWER LIMITED

Figure 1 : Consumer Demand April 2020 vs. April 2019 (in MW and MU)

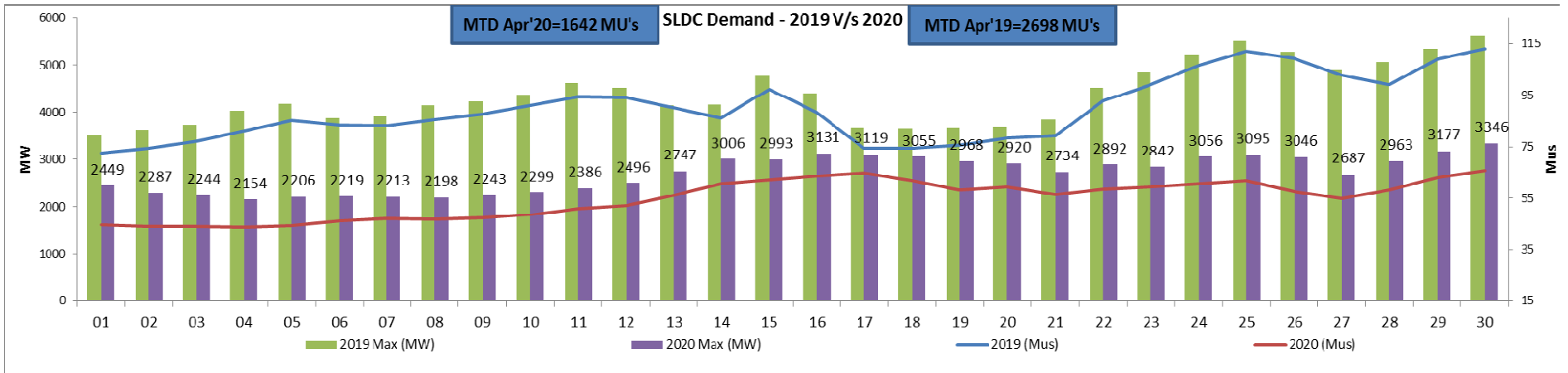
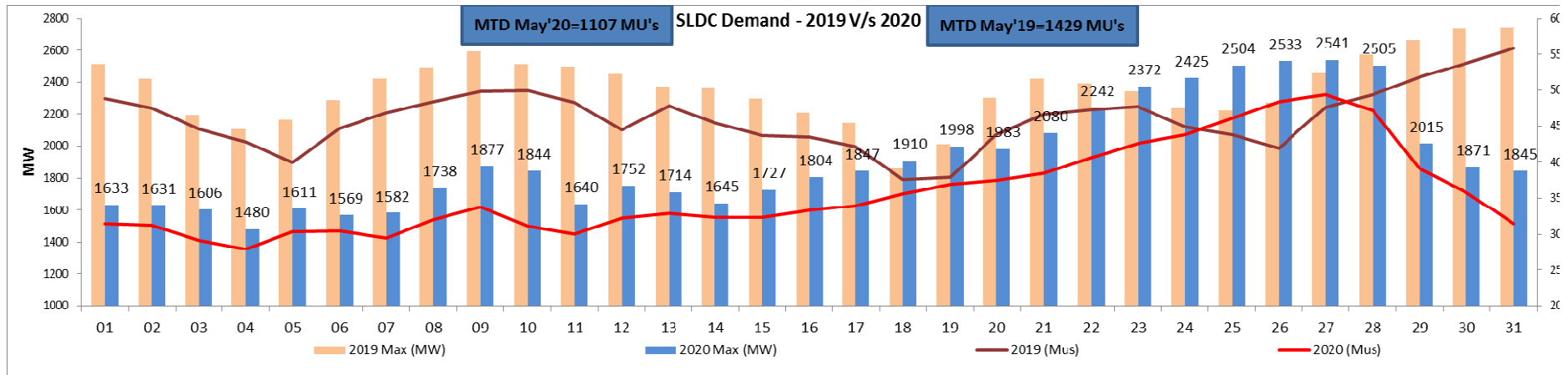


Figure 2 : Consumer Demand May 2020 vs. May 2019 (in MW and MU)



**Cashflow and Average Billing Rate:**

- In addition to the above, the Petitioner's cash flow and Average Billing Rate has been adversely impacted in an unprecedented manner which has also been acknowledged by the Hon'ble Commission in its Order dated April 07, 2020, largely due to: (i) overall lower consumption of electricity from subsidising categories like Non-Domestic and Industrial (ii) significant reduction in paying capacity of consumers due to loss of income / employment, (iii) due to certain regulatory steps taken by this Hon'ble Commission such as allowing three months moratorium for payment of fixed charges.

**Standards of Performance:**

- Apart from the above, the Petitioner's ability to adhere to the Standards of Performance stipulated in the DERC Supply Code and Performance Standards Regulations, 2017 has also been affected, which was also acknowledged by Hon'ble Commission in its communique dated March 25, 2020 and Order dated April 07, 2020. As stated hereinabove the Petitioner had submitted several representations to this Hon'ble Commission seeking certain relaxations and regulatory interventions in this regard.

4.16 The Hon'ble Commission by its Relaxation Order dated May 04, 2020 had granted substantial reliefs to the consumers falling under the Non-Domestic and Industrial Tariff category which constitutes about 13% of the consumer base, 32% of the total sanctioned load, 50% of billed revenue & 50% of monthly collections of the Petitioner. The said directions of this Hon'ble Commission have adversely affected the billing, collections, cash flow & commercial operations of the Petitioner. It is pertinent to note that a comparison of the projections (actuals wherever available) for the period from April to May for the years FY 2019 and FY 2020 suggests that:-

- a. There has been constriction of the Energy demand by about 23% which has resulted in reduction of the billed amounts by 28%.
- b. The revenue collection has drastically fallen by 52%.
- c. The aforesaid impact is even after the fact that the Petitioner has taken various consumer awareness initiatives and has requested its consumers to make timely payment of the electricity bills.

4.17 The aforementioned Relaxation Order dated 4 May'2020 passed by this Hon'ble Commission has further extended additional reliefs to the Industrial and Non-domestic consumers which has inter-alia resulted in following:

- a. Reversal of already raised provisional bills from 24<sup>th</sup> March'2020 to till 30th April'2020.
- b. Fresh bills to be raised with only Fixed Charges (which again cannot be realized since there is a Moratorium of 3 months' as per this Hon'ble Commission's Order dated April 7, 2020, unless a consumer itself wants to pay upfront).

- c. Thus, the total collections potential is reduced, thereby severely affecting Petitioner's cash flows.

- 4.18 In view of the above, the Petitioner urges the Hon'ble Commission to appreciate that while preparing the ARR prior to the COVID-19 pandemic, the assumptions considered by the Petitioner under various heads would have been valid under business-as-usual scenario. However, as evident from the aforesaid submissions, the ongoing pandemic has inter-alia drastically altered the energy consumption behaviour across all categories and all assumptions considered earlier, no longer stand valid. Needless to add that these changes are what are presently discernible by the Petitioner. The full extent of the impact which the pandemic has or would have, is perhaps still not known.
- 4.19 On May 20, 2020, Hon'ble Commission by its communication bearing F.3(615)/Tariff/DERC/2019-20/6772/002 had graciously considered the fact that pursuant to the lockdown imposed throughout the country the projections of major parameters as submitted in the Tariff Petition of ARR of FY 2020-21 would have undergone changes. In view of the changed circumstances due to COVID -19, had granted opportunity to submit a revised Tariff Petition for ARR of 2020-21.
- 4.20 Accordingly, the Petitioner herewith submits revised Aggregate Revenue Requirement for FY 2020-21 for the kind consideration of the Hon'ble Commission.

## **Sales and Revenue**

### **Energy Sales**

- 4.21 The Petitioner in its ARR filed in February 2020 had considered the Adjusted Trend Analysis Method for the purpose of accurate projection of Sales.
- 4.22 However, as it has been highlighted above, the ongoing Force Majeure Conditions have drastically altered consumption behaviour. Also, impact of the pandemic and the resultant restrictions, precautions and limitations imposed by Lockdown varies significantly across different tariff categories of consumers. Accordingly, the impact on each of the tariff categories are being considered and analysed individually to revise the estimate total sales for FY 2020-21.
- 4.23 During the period of Lockdown, given the unprecedented nature of crisis, the Petitioner has no option but to rely on the following to estimate sales for FY 2020-21 to the best of its abilities:
- Actual sales for months of April and May 2020.
  - Various orders passed by central Govt. and GoNCTD which had impact on various categories of consumers in the Petitioner's license area.

- Various inputs received from the field with regard to consumer's consumption behaviour, etc.

4.24 It is further submitted that while formulating the revised energy sales for FY 2020-21, the Petitioner has considered the following:

- That the lock-down will be in full force till June 30, 2020
- After June 30, 2020 there shall be a gradual easing of the lockdown which will have an increasing trend on energy sales starting from July 1, 2020
- The energy consumption will not recover fully immediately on release of the lockdown. The Petitioner expects that such recovery will very extremely gradual and may not fully recover even as on March 31, 2021.
- The Petitioner is therefore considering an increasing recovery (in terms of % of sales which would have been expected under business-as-usual scenario) every subsequent quarter as tabulated below:

*Table 4- 1 : Revised sales expected during FY 2020-21 vis-à-vis earlier estimates (in %)*

S.No	Tariff Category	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20
1	Domestic	100%	85%	85%	100%	100%	100%
2	Non Domestic (Less than 3 KVA)	67%	40%	45%	50%	55%	60%
2	Non Domestic (above 3 KVA)	67%	40%	45%	50%	55%	60%
3	Industrial	67%	40%	50%	60%	70%	80%
4	Agriculture	100%	100%	100%	100%	100%	100%
5	Mushroom Cultivation	100%	100%	100%	100%	100%	100%
6	Public Utilities (Public Lighting & DJB)	100%	100%	100%	100%	100%	100%
7	Delhi International Airport Limited (DIAL)	67%	4%	35%	40%	45%	50%
8	DMRC supply at 66 KV and 220KV	67%	17%	35%	40%	45%	50%
9	Temporary Supply	67%	40%	45%	50%	55%	60%
10	Advertisement and Hoardings	67%	40%	45%	50%	55%	60%
11	Charging Stations for E-Vehicle	67%	40%	45%	50%	55%	60%
12	Self-Consumption	100%	100%	100%	100%	100%	100%

S.No	Tariff Category	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21
1	Domestic	100%	100%	100%	100%	100%	100%
2	Non Domestic (Less than 3 KVA)	65%	70%	75%	80%	85%	90%
2	Non Domestic (above 3 KVA)	65%	70%	75%	80%	85%	90%
3	Industrial	90%	90%	90%	90%	90%	90%
4	Agriculture	100%	100%	100%	100%	100%	100%
5	Mushroom Cultivation	100%	100%	100%	100%	100%	100%



S.No	Tariff Category	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21
6	Public Utilities (Public Lighting & DJB)	100%	100%	100%	100%	100%	100%
7	Delhi International Airport Limited (DIAL)	55%	60%	65%	70%	75%	80%
8	DMRC supply at 66 KV and 220KV	60%	65%	70%	75%	80%	85%
9	Temporary Supply	65%	70%	75%	80%	85%	90%
10	Advertisement and Hoardings	65%	70%	75%	80%	85%	90%
11	Charging Stations for E-Vehicle	65%	70%	75%	80%	85%	90%
12	Self-Consumption	100%	100%	100%	100%	100%	100%

4.25 The Petitioner, while revising the above percentages, has taken in to account the following category-wise considerations (business as usual vis-à-vis ongoing Force Majeure situation):

- **Domestic Including CGHS:** Connections under this category includes mainly residential consumers and a few Government Institutions. Largely during Lockdown these are 100% operational except for the Government Institutions which have not remained fully operational. Therefore in the month of May & June when Government Institutions are largely closed, 85% operations has been taken and thereafter 100%.
- **Non Domestic (<3KVA):** Connections under this category includes small shops, private offices, coaching centres, gyms, spas, saloons etc. During the lockdown phase 1 to phase 3, only the shops selling essential items were allowed to operate in a restricted manner. During the lockdown 4 some other activities like markets and private offices are allowed to operate with some restrictions like odd/even or with limited number of personal presence. It is expected that overall this category would be operational 40% during lockdown and then gradually it will increase to 90% by March '21.
- **Non Domestic (>3KVA):** There are a large number of big shopping malls, cinemas and hotels in the Petitioner's area, which are still closed during lockdown 4.0. Even after the lockdown norms are further relaxed, it is not anticipated that these large malls, cinemas and hotels would not be fully operational or attain their COVID-19 footfall anytime soon. Even when these are allowed to open, public at large would hesitate visiting these crowded places due to social distancing and personal safety. For large star rated hotels the occupancy will depend to a great extent on opening of international flights to and from Delhi. This category also included Government establishments which were operational during the lockdown. It is expected that overall this category would be operational 40% during lockdown and then gradually it will increase to 90% by March '21.
- **Industrial:** Connections under this category include small and medium industries and hospitals. The industries, except manufacturing essential commodities were not allowed to operate during the lockdown and only lighting load would be applicable for these categories of consumers. Hospitals also come under this category they were operational 50% to 100% depending whether they were catering to Covid-19

patients or not. However, in lockdown 4.0 such activities are permitted with some restrictions. Even after the lockdown is lifted, these small & medium industries will take time to come to full production cycle mainly due to migrant labour unavailability and stabilization of chain of supply of raw materials. This category also includes, private hospitals which during the phases of lockdown were allowed to operate but footfall of patients was very low and only the emergency cases were approaching. It has been observed the demand in the big private hospitals was down to 68% compared to the corresponding month of the previous year. It is expected that overall this category would be operational at 40% during lockdown and then gradually it will increase to 90% by March '21.

- **Agriculture, Public Lighting & DJB:** These categories are allowed to operate on 100% basis during and post lockdown and hence no reduction in consumption is assumed.
- **DMRC:** Only lighting load would be billed during the lockdown and post lockdown also this category would not be able to start full operation due to social distancing norms. People will be using their personal vehicles and therefore it is assumed that number of trips will be low. Hence, it is expected that this category would be operational 17% during lockdown (based on actual data) and then gradually it will increase to 85% by March '21.
- **DIAL:** Only cargo and essential services flights are allowed during lockdown. From 25th May'2020 only skeletal domestic flights services are allowed. Despite opening up of domestic sector only needy and essential travellers will be there thus leading to very less number of flights to and from Delhi in the initial months. The domestic operations will gradually pick up and even after opening of the international flights, the airport would not be able to start full operations. We apprehend that excursion trips, family travelling and other leisurely trips will be significantly restricted during FY 20-21. Hence, it is expected that this category would be operational 4% (based on actual data) during lockdown and then gradually it will increase to 80% by March '21.
- **Temporary Supply, Advertisement & Hoardings and E-rickshaw:** The trend of consumption of such consumers has been estimated similar to the Tariff Category of Non-domestic <3KVA.

4.26 In view of the above, the revised energy sales for FY 2020-21 is tabulated below:

**Table 4- 2 : Revised Energy Sales (MU)**

S.No	Tariff Category	Energy Sales in ARR (MU)	Change due to Covid-19	Energy Sales Revised (MU)
1	Domestic	8,136	-3.1%	7,884
2.1	Non Domestic (Less than 3 KVA)	300	-38.2%	185
2.2	Non Domestic (above 3 KVA)	3,035	-37.7%	1,889
3	Industrial	529	-25.6%	394
4	Agriculture	21	0.0%	21
5	Mushroom Cultivation	0	0.0%	0
6	Public Utilities (Public Lighting & DJB)	382	0.0%	382

S.No	Tariff Category	Energy Sales in ARR (MU)	Change due to Covid-19	Energy Sales Revised (MU)
7	Delhi International Airport Limited (DIAL)	250	-54.5%	114
8	DMRC supply at 66 KV and 220KV	369	-43.1%	210
9	Temporary Supply	100	-36.4%	64
10	Advertisement and Hoardings	1	-33.2%	1
11	Charging Stations for E-Vehicle	28	-33.7%	18
12	Own Consumption	16	0.0%	16
	<b>Energy Sales (Total)</b>	<b>13,167</b>	<b>-15.1%</b>	<b>11,178</b>

### Revenue Projection for FY 2020-21 at Existing Tariff

4.27 **Revenue from Fixed Charges:** The revenue calculation from Fixed Charges requires the category/sub-category wise consumers (for Domestic category) and connected load for other categories. The Hon'ble Commission has revised fixed charges vide Tariff Order dated July 31, 2019. The revised Fixed Charges have been considered for estimation of Fixed Charges for FY 2020-21.

4.28 **Revenue from Energy Charges:** For projection of revenue for each category, actual sales trends observed in respective category/ sub-categories have been considered based on the data available for last complete financial year as captured in Form 2.1 (a). In each category the actual proportion of each sub-category/ slab has been considered based on the trends observed and accordingly the sub category/slab wise revenue projection of energy charges has been done. While revising the energy charges, the Petitioner has now considered the revised energy sales, which have been submitted hereinabove.

### Power Factor

4.29 Power factor considered for projection of sales for FY 2020-21 is tabulated below:

*Table 4- 3: Power factor considered*

S. No	Consumer Category	Value
1	<b>Domestic</b>	<b>NA</b>
2	<b>Non Domestic</b>	<b>0.96</b>
3	<b>Industrial</b>	<b>0.97</b>
4	<b>Public Utilities</b>	
a	Public Lighting	1.00
b	DJB (LT)	0.97
c	DJB (HT)	0.97
d	Railway Traction	1.00

S. No	Consumer Category	Value
e	DMRC	1.00
5	DIAL	0.99
6	Advertisement/Hoarding	1.00

4.30 The Petitioner has not made any changes to Power Factor considered in its Tariff Petition No. 1 of 2020, submitted earlier with the Hon'ble Commission, as there is no change in Power Factor due to the lock-down.

#### Revenue estimated for FY 2020-21

4.31 The Revised amount billed on account of above sales to various consumer categories for FY 2020-21 at existing tariff is tabulated below:

*Table 4- 4 : Revenue Billed at Existing Tariff*

S.No	Tariff Category	Revised ARR (MU)	FC Billed (Rs. Cr.)	EC Billed (Rs. Cr.)	TOD Impact (Rs. Cr.)	Amount Billed (Rs. Cr.)
1	Domestic	7,884	496	3,275	-	3,771
2.1	Non Domestic (Less than 3 KVA)	185	112	111	1	224
2.2	Non Domestic (above 3 KVA)	1,889	690	1,673	13	2,375
3	Industrial	394	94	315	3	412
4	Agriculture	21	4	3	-	8
5	Mushroom Cultivation	0	0	0	-	0
6	Public Utilities (Public Lighting & DJB)	382	56	241	-1	296
7	Delhi International Airport Limited (DIAL)	114	15	89	0	105
8	DMRC supply at 66 KV and 220KV	210	16	133	5	153
9	Temporary Supply	64	-	70	0	70
10	Advertisement and Hoardings	1	1	1	-	1
11	Charging Stations for E-Vehicle	18	-	8	-	8
12	Own Consumption	16	-	-	-	-
13	<b>Total</b>	<b>11,178</b>	<b>1,484</b>	<b>5,919</b>	<b>21</b>	<b>7,424</b>

#### Distribution Loss and Collection Efficiency

##### Distribution Loss

4.32 Regulation-25 (1) of the Business Plan Regulations, 2019 specifies the distribution Loss Target from FY 2020-21 to FY 2022-23 as under:

**"25. TARGET FOR DISTRIBUTION LOSS**

*(1) The Distribution Loss target in terms of Regulation 4(9)(a) of the DERC (Terms and Conditions for Determination of Tariff) Regulations, 2017 for the Distribution licensees shall be as follows:*

**Table 15: Target for Distribution Loss for the Control Period**

<b>Sr No.</b>	<b>Distribution Licensee</b>	<b>2020-21</b>	<b>2021-22</b>	<b>2022-23</b>
1	BSES Rajdhani Power Ltd.	8.10%	8.00%	7.90%

.."

- 4.33 The Hon'ble Commission in the Business Plan Regulations, 2019 has approved the stringent distribution loss trajectory as compared to Distribution Loss trajectory proposed by the Petitioner in its Business Plan. As against the distribution loss of 9.28% for FY 2020-21 proposed by the Petitioner in its Business Plan, the Hon'ble Commission has approved the Distribution Loss of 8.10% for FY 2020-21.
- 4.34 Further the Petitioner has requested the Hon'ble Commission vide its letter number RA/ 2020-21/ 01/A/055 dated 15.05.2020 about the methodology notified by CEA for computation of T&D Losses and consequent AT&C Losses. The Ministry of Power has also requested all DISCOMs to adopt the methodology recommended by CEA. Currently the methodology followed by various stakeholders for computation of T&D Losses is at variance with the methodology recommended by CEA which has been highlighted by the Licensee in the above letter. We request the Hon'ble Commission to issue appropriate directions to various stakeholders to follow the methodology recommended by CEA for computation of T&D Losses and consequently the AT&C losses.
- 4.35 The Petitioner was able to achieve actual Distribution Loss from 16.14% in FY 2013-14 to 9.94% in FY 2017-18, but as the base level of loss reduces, further reduction of distribution loss becomes more and more difficult. The Petitioner would like to submit that it has considered the distribution loss at 8.10% for Projecting the ARR for FY 2020-21 as per the Business Plan Regulations, 2019 issued by the Commission.
- 4.36 Although, the Petitioner has considered the Distribution Loss @8.10%, the consumption mix of HT/ EHT connections is dropped by 3% and such consumers are billed at distribution loss of around 1.5% or lower resulting in adverse impact of at least 0.4% on the Distribution loss of the Petitioner.
- 4.37 However, since the full extent of the impact of COVID-19 is still not fully known, if any major constraint is faced by the Petitioner in achieving the distribution loss target approved by the Hon'ble Commission, the Petitioner reserves its right to approach the Hon'ble Commission for suitable relaxation.

**Collection Efficiency**

- 4.38 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.
- 4.39 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.
- 4.40 As noted previously, 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. Yet despite this, owing to various Central Government Directives etc, power supply has remained completely unaffected to the consumers of Delhi.
- 4.41 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 Collection for the Petitioner was 63.1% in the months of April and May 2020.
- 4.42 Delhi has continued the lockdown, with certain variances, till 30th June 2020. 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.
- 4.43 In this unprecedented situation it is also not possible to model what the economic scenario would be in the rest of the Financial Year.
- 4.44 In case the lockdown is released or lifted on June 30, 2020, 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.

- 4.45 During the continuance of such embargo there is absolutely no way of ensuring payment of electricity bills. This was especially so in the background of the widely held expectation that electricity distribution companies would not disconnect connections for non-payment of bills which was reinforced by various statements reported to be made even by the Hon'ble Minister of Power of the Central Government that there would be "uninterrupted power supply" during the lockdown and even generating companies were being instructed not to discontinue power supply on account of non-payment by discoms.
- 4.46 Therefore, in this situation of extreme uncertainty, it is proposed that for the purpose of projecting the ARR, the Collection Efficiency Target for the FY 2020-21 be an amalgam of the actual Collection Efficiency in Q1 of this Financial Year (i.e. 63.1%) and the projected Collection Efficiency for the balance 9 months of the year at the same level as contemplated in the **Business Plan Regulation 2019** (99.5%). The weighted average of the Collection Efficiency on such basis would come to 91.12%.
- 4.47 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.
- 4.48 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.

## Energy Requirement

- 4.49 Based on the revised sales projected for FY 2020-21 and Distribution loss as specified for FY 2020-21 in the Business Plan Regulations, 2019, the estimated energy requirement based on the sales and distribution loss as per the aforesaid discussion is tabulated below:

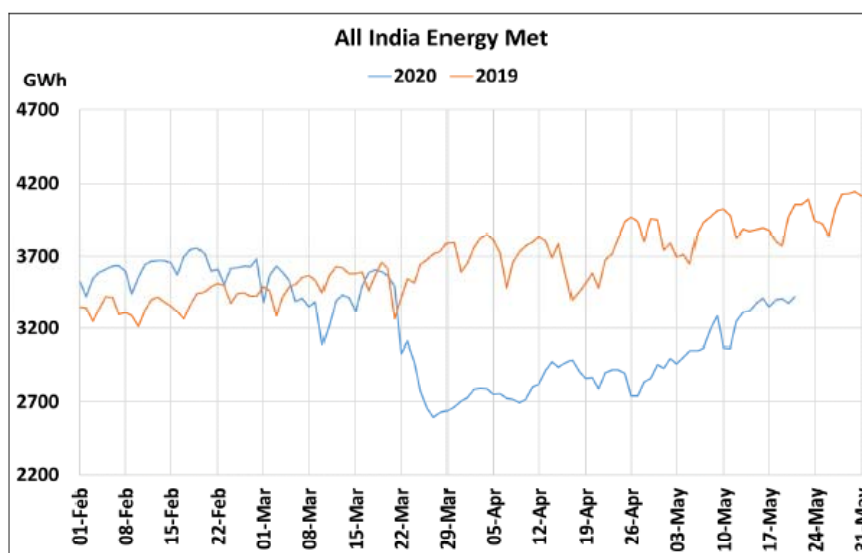
**Table 4- 5 : Energy Requirement for FY 2020-21**

S. No	Particulars	Unit	Quantity	Remarks
A	Energy sales	MU	11178	Error! Reference source not found.
B	Distribution Loss	%	8.10%	Table 15 of Business Plan Regulations, 2019
C	Energy Requirement	MU	12163	A/(1-B)
D	Distribution Loss	MU	985	C-A



- 4.50 As stated hereinabove various restrictions have been imposed by the GoNCTD through its notification dated 12.03.2020, 16.03.2020, Lockdown Order dated 22.03.2020 thereafter various Lockdown Orders issued by MoHA from 24.03.2020, as stated hereinabove. The operations related to electricity supply (viz. Power Generation, Transmission and Distribution) have been exempted under the lockdown to ensure uninterrupted power supply.
- 4.51 Electricity demand may continue to be subdued over the next few months. At this point, it is unclear that when lockdown restrictions are eased, how soon economic activities will return to pre COVID-19 levels.
- 4.52 As per POSOCO, there is steep reduction in Energy requirement across India, in particular Northern India saw a collapse in its Energy Requirement. A comparison w.r.t. last year has been done by POSCO which clearly depicts the conditions during COVID crisis.

**Figure 3 : Energy Requirement comparison by POSCO**



22 March 2020: Janta Curfew  
 25 March – 14 April 2020: All-India containment measures vide MHA order no. 40-3/2020-DM-I(A)  
 5 April 2020: Lighting switch off event at 21:00 hrs for 9 minutes  
 14 April – 3 May 2020: Extension of all-India containment measures  
[posoco.in/covid-19](https://posoco.in/covid-19)

- 4.53 Accordingly, the Petitioner has considered the actual reduction in Energy input of vis-à-vis previous year.
- 4.54 If the conditions changes further, the Energy Input requirement will be accordingly revised.

## Power Purchase

Long Term Sources

4.55 The Petitioner sources its power requirement through mix of long term and short-term sources to meet the demand of Delhi. Long term sources include Central Generating Stations which are owned and/or fully controlled by Central Government and State Generating Stations which are owned and/or fully controlled by State Government. The Petitioner has been assigned the share from these plants based on the PPAs which have been inherited from Delhi Transco Limited and assigned to the Petitioner by way of Orders passed by the Hon'ble Commission. The allocation of power within Delhi is being done by the Hon'ble Commission.

4.56 The energy from various existing and upcoming generating stations has been estimated by applying Merit Order Dispatch Scheduling principle in the following manner:

**i. NTPC Stations**

- Revised allocation of various generating stations is considered as per Hon'ble Commission's last Tariff Order dated July 31, 2019 for FY 2019-20.
- The power availability has been estimated based on the actual availability of the power plants over the past 5 years.
- Backing down of Dadri-1&2 stations are considered for April and May months due to COVID crisis.

**ii. BTPS**

- No procurement is considered due to expected phasing out of plant.

**iii. NHPC Stations**

- Revised allocation of various generating stations is considered as per Hon'ble Commission's last Tariff Order dated July 31, 2019 for FY 2019-20.
- The power availability has been estimated based on the actual availability of the power plants over the past 5 years.

**iv. SJVNL, THDC, NPCIL, DVC, Sasan and SGS stations**

- The power availability has been estimated based on the actual availability of the power plants over the past 5 years.

**v. RE Sources**

- For already available sources, availability is projected based on the average of actual availability of the plants in the past 5 years.

**vi. New Generating Stations**

- The expected COD has been taken from various sources like latest CEA reports, PPA signed with the generation companies;

- Power availability after COD has been projected taking into account norms of auxiliary consumption, terms agreed in the PPA, expected PLF and Petitioners share in power generated as per the normative operational parameters specified by CERC.

4.57 The energy estimated to be available during FY 2020-21 is tabulated below:

**Table 4- 6 : Energy Available for FY 2020-21**

S. No.	Particulars	Installed Capacity	BRPL Share (Installed Capacity)		Energy Available (ex-Bus)
		MW	%	MW	MU
<b>I</b>	<b>Existing Sources</b>				
<b>A</b>	<b>NTPC Ltd.</b>				
1	Anta Gas Power Project	419	5%	19	29
2	Auraiya Gas Power Station	663	5%	32	32
3	Badarpur Thermal Power Station	705	0%	0	0
4	Dadri Gas Power Station	830	5%	40	77
5	Feroze Gandhi Unchahar TPS 1	420	3%	11	49
6	Feroze Gandhi Unchahar TPS 2	420	5%	21	129
7	Feroze Gandhi Unchahar TPS 3	210	6%	13	79
8	Farakka STPS	1600	1%	10	59
9	Kahalgaon Thermal Power Station 1	840	3%	22	144
10	National Capital Thermal Power Station	840	67%	559	1512
11	Rihand Thermal Power Station 1	1000	7%	69	471
12	Rihand Thermal Power Station 2	1000	6%	55	384
13	Singrauli STPS	2000	1%	30	208
14	Kahalgaon Thermal Power Station 2	1500	5%	69	443
15	Dadri TPS-II	980	55%	543	2644
16	Rihand Thermal Power Station 3	1000	8%	78	543
	<b>Sub Total</b>			<b>1571</b>	<b>6804</b>
<b>B</b>	<b>NHPC Ltd.</b>				
1	Bairasiul	180	5%	9	0
2	Salal	690	9%	60	294
3	Chamera I	540	3%	19	84
4	Tanakpur	120	6%	7	25

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S. No.	Particulars	Installed Capacity MW	BRPL Share (Installed Capacity)		Energy Available (ex-Bus) MU
			%	MW	
5	Uri	480	5%	23	139
6	Dhauliganga	280	6%	16	58
7	Chamera - II	300	6%	18	86
8	Dulhasti	390	6%	22	127
9	Chamera - III	231	6%	13	56
10	SEWA-II	120	6%	7	31
11	Uri II	240	6%	14	78
12	Parbati-III	520	6%	29	37
	<b>Sub Total</b>			<b>236</b>	<b>1014</b>
<b>C</b>	<b>Nuclear Power Corp. of India Ltd.</b>				
1	Narora	440	8%	33	223
2	Kota UNIT - 5&6 RAPP	440	6%	25	168
	<b>Sub Total</b>			<b>58</b>	<b>390</b>
<b>D</b>	<b>Satluj Jal Vidyut Nigam Ltd.</b>				
1	NathpaJhakri	1500	4%	62	287
	<b>Sub Total</b>			<b>62</b>	<b>287</b>
<b>E</b>	<b>Tehri Hydro Development Corp. Ltd.</b>				
1	Tehri	1000	4%	44	135
2	Koteshwar	400	7%	27	83
	<b>Sub Total</b>			<b>71</b>	<b>218</b>
<b>F</b>	<b>PTC</b>				
1	Tala			13	33
2	Tuticorin			50	145
	<b>Sub Total</b>			<b>13</b>	<b>178</b>
<b>G</b>	<b>Damodar Valley Corporation</b>				
1	Mejia Unit 6	250	17%	43	207
2	CTPS Units 7 & 8	500	26%	132	764
	<b>Sub Total</b>			<b>175</b>	<b>971</b>
<b>H</b>	<b>Power stations in Delhi</b>				
1	Indraprastha Power Generation Co.Ltd. RPH	0	0%	0	0
2	Indraprastha Power Generation Co.Ltd. GT	282	61%	172	355
3	Pragati Power Corp.Ltd. Pragati I	330	28%	93	475
4	Pragati Power Corp.Ltd. Pragati III (Bawana)	1371	31%	427	1197

S. No.	Particulars	Installed Capacity MW	BRPL Share (Installed Capacity)		Energy Available (ex-Bus) MU
			%	MW	
5	Timarpur Okhla Waste Management Company Private Ltd.	16	50%	8	60
6	Thyagraj Solar	1	0%	0	0
7	Delhi MSW Solution Limited	24	42%	10	48
	<b>Sub Total</b>			<b>710</b>	<b>2136</b>
<b>I</b>	<b>Aravali Power Corporation Ltd .</b>				
1	Jhajjar	1500	1%	10	42
	<b>Sub Total</b>			<b>10.0</b>	<b>42</b>
<b>J</b>	<b>UMPP</b>				
1	Sasan	3960	2%	66	495
	<b>Sub Total</b>			<b>66</b>	<b>495</b>
<b>K</b>	<b>SECI</b>				
1	ACME			20	44
	<b>Sub Total</b>			<b>20</b>	<b>44</b>
<b>L</b>	<b>New Sources</b>				
1	TapovanVishnugad	520	6%	31	49
2	INOX	250	20%	50	72
	<b>Sub Total</b>			<b>81</b>	<b>121</b>
	<b>Total</b>			<b>3073</b>	<b>12700</b>

4.58 The power purchase cost has been estimated from the aforesaid sources as per the assumptions given below:

**i. Inter State Generating Stations (ISGS) Thermal Stations:**

- Annual fixed Charges (AFC) are considered approved by the CERC except for NCTPS and Dadri TPS-II, where billed is considered.
- Variable Cost (VC) has been considered equivalent to variable cost of FY 2019-20, escalated by 3%.

**ii. ISGS Hydro Stations:**

- Annual fixed Charges (AFC) are considered approved by the CERC.
- Variable Cost (VC) has been considered equivalent to the actual variable cost incurred during FY 2019-20.

**iii. State Generating Stations:**

- Annual fixed Charges (AFC) are considered as approved by the Hon'ble Commission in Tariff Order issued for FY 2019-20.
- Variable Cost (VC) has been considered equivalent to variable cost of FY 2019-20, escalated by 3%.

**iv. RE Sources:**

- The cost of procurement from TOWMCL, Tuticorin, SECI, and Wind SECI have been considered as per the PPAs signed and/or billed, as the case may be.

**v. Sasan:**

- Variable Cost (VC) has been considered equivalent to variable cost of FY 2019-20.

**vi. New Generating Stations:**

- The Cost of power from new stations have been considered same as the average power purchase cost of similar stations and as indicated by various generating stations.
- Cost of Tapovan Vishnugad considered as Rs. 4.35/kWh being a highest cost of Hydro Generation.
- The Cost of power from new conventional hydro stations is considered as the cost of the most expensive hydro source available as the new hydro generating stations have become costly.

**vii. Other Charges**

- The Petitioner has considered the other cost in accordance with equivalent to actual cost observed during FY 2019-20.

4.59 The revised power purchase cost as proposed for various stations during FY 2020-21 is tabulated below:

**Table 4- 7 : Power Purchase Cost from Long Term Sources proposed for FY 2020-21**

S. No.	Particulars	Energy Purchase	Fixed Charges	Energy Charges	Other Charges	Total PPC	Total PPC
		MU	Rs.Cr.	Rs.Cr.	Rs.Cr.	Rs.Cr.	Rs./kWh
<b>I</b>	<b>Existing Sources</b>						
<b>A</b>	<b>NTPC Ltd.</b>						
<b>1</b>	Anta Gas Power Project	29	10	10	0	21	7.15
<b>2</b>	Auraiya Gas Power Station	32	15	12	1	27	8.45
<b>3</b>	Badarpur Thermal Power Station	0	0	0	0	0	0.00
<b>4</b>	Dadri Gas Power Station	77	17	27	3	47	6.04
<b>5</b>	Feroze Gandhi Unchahar TPS 1	49	7	18	0	25	5.03

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S. No.	Particulars	Energy Purchase	Fixed Charges	Energy Charges	Other Charges	Total PPC	Total PPC
		MU	Rs.Cr.	Rs.Cr.	Rs.Cr.	Rs.Cr.	Rs./ kWh
6	Feroze Gandhi Unchahar TPS 2	129	13	46	0	59	4.60
7	Feroze Gandhi Unchahar TPS 3	79	11	28	0	39	4.95
8	Farakka STPS	59	6	15	1	22	3.78
9	Kahalgaoon Thermal Power Station 1	144	16	33	0	48	3.37
10	National Capital Thermal Power Station	1512	376	644	12	1032	6.83
11	Rihand Thermal Power Station 1	471	41	66	0	106	2.25
12	Rihand Thermal Power Station 2	384	27	54	0	81	2.11
13	Singrauli STPS	208	13	30	0	43	2.06
14	Kahalgaoon Thermal Power Station 2	443	53	95	0	148	3.34
15	Dadri TPS-II	2644	555	1015	10	1581	5.98
16	Rihand Thermal Power Station 3	543	80	75	0	155	2.85
	<b>Sub Total</b>	<b>6804</b>	<b>1239</b>	<b>2167</b>	<b>28</b>	<b>3434</b>	<b>5.05</b>
<b>B</b>	<b>NHPC Ltd.</b>						
1	Bairasiul	0	3	0	0	3	0.00
2	Salal	294	14	18	27	59	2.02
3	Chamera I	84	6	10	0	15	1.82
4	Tanakpur	25	4	4	0	8	3.06
5	Uri	139	9	11	4	24	1.76
6	Dhauliganga	58	7	7	0	14	2.42
7	Chamera - II	86	8	9	0	16	1.89
8	Dulhasti	127	26	33	4	63	4.94
9	Chamera - III	56	10	14	0	24	4.35
10	SEWA-II	31	7	6	0	13	4.27
11	Uri II	78	12	14	4	30	3.93
12	Parbati-III	37	15	6	0	20	5.52
	<b>Sub Total</b>	<b>1014</b>	<b>121</b>	<b>131</b>	<b>39</b>	<b>291</b>	<b>2.87</b>
<b>C</b>	<b>Nuclear Power Corp. of India Ltd.</b>						
1	Narora	223	0	66	6	72	3.24
2	Kota UNIT - 5&6 RAPP	168	0	66	2	68	4.07
	<b>Sub Total</b>	<b>390</b>	<b>0</b>	<b>132</b>	<b>8</b>	<b>140</b>	<b>3.59</b>
<b>D</b>	<b>Satluj Jal Vidyut Nigam Ltd.</b>						
1	NathpaJhakri	287	29	33	0	62	2.15
	<b>Sub Total</b>	<b>287</b>	<b>29</b>	<b>33</b>	<b>0</b>	<b>62</b>	<b>2.15</b>
<b>E</b>	<b>Tehri Hydro Development Corp. Ltd.</b>						
1	Tehri	135	28	34	0	62	4.62



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S. No.	Particulars	Energy Purchase	Fixed Charges	Energy Charges	Other Charges	Total PPC	Total PPC
		MU	Rs.Cr.	Rs.Cr.	Rs.Cr.	Rs.Cr.	Rs./kWh
2	Koteshwar	83	16	19	0	35	4.19
	<b>Sub Total</b>	<b>218</b>	<b>44</b>	<b>53</b>	<b>0</b>	<b>97</b>	<b>4.46</b>
<b>F</b>	<b>PTC</b>						
1	Tala	33	0	7	0	7	2.16
2	Tuticorin	145	0	51	0	51	3.53
	<b>Sub Total</b>	<b>178</b>	<b>0</b>	<b>58</b>	<b>0</b>	<b>58</b>	<b>3.28</b>
<b>G</b>	<b>Damodar Valley Corporation</b>						
1	Mejia Unit 6	207	41	64	0	105	5.09
2	CTPS Units 7 & 8	764	140	185	0	325	4.26
	<b>Sub Total</b>	<b>971</b>	<b>181</b>	<b>249</b>	<b>0</b>	<b>430</b>	<b>4.43</b>
<b>H</b>	<b>Power stations in Delhi</b>						
1	Indraprastha Power Generation Co.Ltd. RPH	0	0	0	0	0	0.00
2	Indraprastha Power Generation Co.Ltd. GT	355	90	173	0	263	7.41
3	Pragati Power Corp.Ltd. Pragati I	475	43	271	0	314	6.61
4	Pragati Power Corp.Ltd. Pragati III (Bawana)	1197	408	462	0	870	7.27
5	Timarpur Okhla Waste Management Company Private Ltd.	60	0	17	0	17	2.86
6	Thyagraj Solar	0	0	0	0	0	0.00
7	Delhi MSW Solution Limited	48	0	34	0	34	7.03
	<b>Sub Total</b>	<b>2136</b>	<b>541</b>	<b>958</b>	<b>0</b>	<b>1498</b>	<b>7.02</b>
<b>I</b>	<b>Aravali Power Corporation Ltd .</b>						
1	Jhajjar	42	11	17	0	28	6.74
	<b>Sub Total</b>	<b>42</b>	<b>11</b>	<b>17</b>	<b>0</b>	<b>28</b>	<b>6.74</b>
<b>J</b>	<b>UMPP</b>						
1	Sasan	495	7	57	6	70	1.41
	<b>Sub Total</b>	<b>495</b>	<b>7</b>	<b>57</b>	<b>6</b>	<b>70</b>	<b>1.41</b>
<b>K</b>	<b>SECI</b>						
1	ACME	44	0	24	0	24	5.50
	<b>Sub Total</b>	<b>44</b>	<b>0</b>	<b>24</b>	<b>0</b>	<b>24</b>	<b>5.50</b>
<b>L</b>	<b>New Sources</b>						
1	TapovanVishnugad	49	0	21	0	21	4.35
2	INOX	72	0	25	0	25	3.53

S. No.	Particulars	Energy Purchase	Fixed Charges	Energy Charges	Other Charges	Total PPC	Total PPC
		MU	Rs.Cr.	Rs.Cr.	Rs.Cr.	Rs.Cr.	Rs./kWh
	<b>Sub Total</b>	<b>121</b>	<b>0</b>	<b>47</b>	<b>0</b>	<b>47</b>	<b>3.86</b>
	<b>Total</b>	<b>12700</b>	<b>2174</b>	<b>3926</b>	<b>81</b>	<b>6181</b>	<b>4.87</b>

### Short term power purchase

- 4.60 The Petitioner requires short term power to meet the peak demand so as to ensure uninterrupted and quality supply of power to its consumers and also to comply with the directives issued by the Hon'ble Commission as well as Supply Code and Standards of Performance.
- 4.61 The Petitioner always attempts to dispose-off its surplus power in an economic manner. Given the seasonal and within the day variations on account of temperature in Delhi, the demand for power varies widely between the peak and the off-peak hours during a day and between the summer and winter months. As the demand varies hugely within a day, it becomes essential for the Discoms like the Petitioner to prepare or arrange the power on slot-wise basis.
- 4.62 The Power System Operation Corporation Limited (National Load Dispatch Centre) in "Electricity Demand Pattern Analysis" Report, 2016 has also acknowledged the fact that Delhi has a variation of 30% to 60% between peak demand and lean demand. Such sharp variations and fluctuations in demand necessitate the Petitioner to arrange for buffer power so as to ensure uninterrupted and reliable supply of power to Delhi Consumers. In order to cater to the rising demand, the Petitioner has to arrange for power from long and short term sources. But, due to COVID-19, the Petitioner estimated less short term procurement during summers of 2020 vis-à-vis earlier projected.
- 4.63 The Petitioner has projected the energy requirement and energy availability on monthly basis by applying MOD principles. The deficit thus observed has been considered to be met through short term purchases at the State Periphery as under:

**Table 4- 8: Monthly Deficit considered to be met through Short Term Purchases**

Month	STU Quantum Required (MU)	Total Availability @ State Periphery	Shortage/(Surplus) (MU)
-------	---------------------------	--------------------------------------	-------------------------

<b>Apr-20</b>	741	735	6
<b>May-20</b>	1117	840	277
<b>Jun-20</b>	1279	1197	82
<b>Jul-20</b>	1302	1208	94
<b>Aug-20</b>	1250	1197	53
<b>Sep-20</b>	1269	1122	147
<b>Oct-20</b>	1066	1141	-76
<b>Nov-20</b>	820	980	-160
<b>Dec-20</b>	866	1033	-167
<b>Jan-21</b>	947	1075	-128
<b>Feb-21</b>	773	894	-120
<b>Mar-21</b>	846	964	-118

4.64 The Petitioner has considered the aforesaid energy to be met through short term procurement from FY 2020-21. For the purpose of short term purchase cost, the average rate of Rs. 3.65/kWh has been considered in accordance with the actual rate of FY 2019-20.

4.65 Accordingly, the power purchase cost through Short term sources for FY 2020-21 is tabulated below:

**Table 4- 9: Short term power purchase for FY 2020-21**

Sl.No.	Source	Energy Purchased	Cost per Unit	Total Cost
		(MU)	(Rs./unit)	(Rs.Cr.)
<b>A</b>	<b>Short Term Purchase</b>	<b>659</b>	<b>3.65</b>	<b>240</b>

4.66 The Petitioner requests the Hon'ble Commission to allow the aforesaid cost in the ARR of the Petitioner.

#### **Renewable Purchase Obligation (RPO):**

4.67 Regulation-27 of DERC Business Plan Regulations, 2019 specifies the target for Renewable Purchase Obligation from FY 2020-21 to FY 2022-23 as below:

#### **"27. TARGET FOR RENEWABLE PURCHASE OBLIGATION**

*(1) The targets for Renewable Purchase Obligation (RPO) in terms of Regulation 124 of the DERC (Terms and Conditions for Determination of Tariff) Regulations, 2017 of a Distribution Licensee from FY 2020-21 to FY 2022-23, shall be computed as a percentage of total sale of power, to its retail consumers in its area of supply, excluding procurement of hydro power.*

*The target for RPO shall be met through purchase of power from various Renewable Energy sources or purchase of Renewable Energy Certificates ('REC') or combination of both, and shall be as follows:*

**Table 16: Targets for Renewable Purchase Obligation**

Sr No.	Distribution Licensee	2020-21	2021-22	2022-23
1	Non Solar Target	<b>10.25%</b>	10.25%	10.50%
2	Solar Target	<b>7.25%</b>	8.75%	10.50%
3	Total	<b>17.50%</b>	19.00%	21.00%

..."

4.68 Accordingly, the solar and non-solar RPO for FY 2020-21 of the Petitioner is tabulated below:

**Table 4- 10: Solar and Non-Solar Targets**

Particulars	Solar	Non Solar	Total
Sales (MU)		11178	
Hydro Purchase (MU)		1601	
Base for RPO (MU)		9577	
Target (%)	7.25%	10.25%	17.50%
Target (MU)	694	982	1676
Arrangement (MU)	44	326	370
Shortfall (MU)	651	656	1306

4.69 The Petitioner had proposed that the RPO targets be set in such a way that the Petitioner may meet its targets with the help of tied up sources. Further, any excess energy procured from Renewable Energy Sources during these years can be utilised to meet the previous year's shortfall of achieving RPO target.

4.70 The Petitioner in order to meet the aforesaid targets have entered into a PPA with various RE Generators. However, most of the Generators have shown their inability to Commission the projects due to the unprecedented COVID19 situation. They have pleaded force majeure and have shown their inability to commission the projects.

4.71 The Petitioner has entered into 1100 MW of Power Purchase Agreement (PPA) with SECI/PTC to meet its Renewable Purchase Obligation. However, various RE developers have expressed their inability to Commission their projects as contractually agreed. In fact, in some cases, certain developers have sought to terminate their contractual arrangements inter alia citing the implications of COVID-19 as a reason. Certain developers have also approached the CERC inter

alia seeking declaratory reliefs. In view of the foregoing, while the Petitioner would try its best, within the bounds of law, to procure as much power from these RE sources, the Petitioner has not considered any procurement from such stations during FY 2020-21.

- 4.72 In addition, the low RE Potential of Delhi and unavailability of real estate within and around New Delhi has led to very little development of RE Generation in the State. However, as per Business Plan Regulations, 2019, the Petitioner have option for procurement of REC's for any shortfall in RE procurement. Procurement of RE certificates without any RE power would unnecessarily burden the consumers of Delhi with additional costs. Procurement of RE certificates would mean procurement of Certificates without any real flow of power. During this financial year when the entire country is in the grip of the pandemic, procurement of RE would also affect the Petitioner financial situation, where the Petitioner is yet to recover its Regulatory Assets and is barely able to meet its operation costs. In such precarious financial condition, and in absence of cost reflective tariff, the Petitioner is severely constrained to procure REC's for the FY 2020-21.
- 4.73 The Cash flow position is not sufficient to service all the costs including the power purchase costs etc. If the Hon'ble Commission desires the cash-flow of future year, the same can be furnished. The overhang of the lockdown period will also have to be borne by the Petitioner when the lockdown opens. For example, the deferment of fixed charges etc for the months of April May and June 2020 will have to be paid w.e.f July 2020
- 4.74 It is therefore prayed that the Hon'ble Commission be pleased to relax the RPO targets of the Petitioner and refrain from taking any coercive step since non fulfilment of the RPO during FY 2020-21 is beyond the control of the Petitioner.
- 4.75 Accordingly, the Petitioner has not considered any cost in its ARR

#### Transmission Loss and Transmission Charges:

- 4.76 The Following Assumptions are made for calculation of Transmission Charges and Losses:
- **Intra-State Transmission:** The Intra-State Transmission Loss during FY 2020-21 has been considered @ 0.92%, i.e., approved intra-state transmission loss.
  - **Inter-State Transmission:** The Inter-State Transmission Loss has been considered @ 3.00%.
  - **Transmission Charges:** For estimation of Inter-State and Intra-State Transmission Charges, the Petitioner has considered the transmission charges as per the actuals for FY 2019-20.

- 4.77 The Intra-State and Inter-State Transmission losses and Charges projected for FY 2020-21 is tabulated below:

*Table 4- 11: Transmission Charges*

S. No	Particulars	FY 2020-21
<b>A</b>	<b>Transmission losses (MU)</b>	
<b>I</b>	Inter-State Transmission	314
<b>ii</b>	Intra-State Transmission	112
<b>iii</b>	<b>Total Transmission losses (MU)</b>	<b>426</b>
<b>B</b>	<b>Transmission Charges (Rs. Crore)</b>	<b>1087</b>

### Energy Balance:

- 4.78 Based on the above discussion, the energy balance for FY 2020-21 is tabulated below. The deficit/(surplus) energy is calculated at the Distribution Periphery.

*Table 4- 12: Energy Balance*

S. No.	Particulars	Units	FY 2020-21
<b>Energy Availability</b>			
<b>1</b>	Total Energy Available (Excluding SGS Plants)	MU	10564
<b>2</b>	Inter-State Transmission Loss	%	3.00%
<b>3</b>	Inter-State Transmission Loss	MU	314
<b>4</b>	Energy Available from Delhi stations	MU	2076
<b>5</b>	Short Term Purchase	MU	659
<b>6</b>	Short Term Sale	MU	770
<b>7</b>	Generation within licensee area (TOWMCL)	MU	60
<b>8</b>	Energy Available at State Transmission Periphery	MU	12215
<b>9</b>	Intra-State Transmission Loss	%	0.92%
<b>10</b>	Intra-State Transmission Loss	MU	112
<b>11</b>	Net Energy available at Distribution Periphery	MU	12163
<b>Energy Requirement</b>			
<b>1</b>	Energy Sales	MU	11178
<b>2</b>	Distribution Loss	MU	8.10%
<b>3</b>	Energy requirement at Distribution Periphery	MU	12163

### Sale of surplus power:

- 4.79 The Petitioner sells excess power so as to reduce the Power Purchase costs for the consumers. The proceeds from such sale of power goes towards reduction of power purchase cost and consequently the Aggregate Revenue Requirement of the Petitioner.

- 4.80 The Petitioner vide its letter RA/ 2019-20/01/A/670 dated 26.03.2020 highlighted the requirement for installation of ABT Check Meters at DTL-BRPL Interface by the Petitioner for real-time monitoring of the data for compliance with CERC (Deviation Settlement Mechanism) Regulations, 2014 (as amended from time to time). We request the Hon'ble Commission to direct various stakeholders to implement the ABT Meters so that the Petitioner is in a position to effectively implement the CERC DSM Regulations on a real-time basis.
- 4.81 Further the Petitioner vide its letter RA/ 2020-21/01/A/015 dated 17.04.2020 requested the Hon'ble Commission to intervene and direct SLDC to revise the methodology for levying sustained deviation penalty to Delhi Utilities. The Petitioner once again requests the Hon'ble Commission to pass appropriate orders and direct the SLDC to change the methodology of levying sustained deviation penalty on DISCOMs by linking it to the number of sustained deviations by a particular utility rather than total amount of sustained deviation. Till such time, we request the Hon'ble Commission to keep levy of such penal amount at abeyance.
- 4.82 The Petitioner has considered the aforesaid excess energy to be sold through short term sale during FY 2020-21. For the purpose of short-term sale rate, the sale rate has been considered as Rs. 2.20/ unit in line with the actual rate of FY 2019-20. Accordingly, the estimated short term sale for FY 2020-21 is tabulated below:

**Table 4- 13: Short term Sale of Power**

S.No.	Source	Energy Sale (MU)	Cost per Unit (Rs./unit)	Total Cost (Rs. Cr.)
1	2	3	4	5=3*4
1	Short Term Sale	770	2.20	169

**Rebate on Power Purchase and Transmission Charges:**

- 4.83 The Petitioner has not considered receiving rebate on power purchase cost from generating stations and Transmission Charges during FY 2020-21 due to severe financial condition on account of COVID-19.
- 4.84 Further, in the light of the announcements made by Honb'le Finance Minister on 13.05.2020 under the Atmanirbhar Bharat special economic and comprehensive package including therein the liquidity infusion by PFC/REC of Rs.90,000 crore to DISCOMs against receivables and loans to be given against State guarantees for exclusive purpose of discharging liabilities of DISCOMS to power Generating



companies (Gencos), and also giving rebate to DISCOMs by Central Public Sector Generation Companies for passing on to the final consumers.

4.85 MOP vide its Order dated 15th & 16th May 2020 has decided that all Central Public Sector Generation Companies under Ministry of Power including their Joint Ventures/Subsidiaries and Central Public Sector Transmission Company, may consider to offer following rebate to the Distribution Companies (Discoms) for passing on to the end consumers for the lockdown period on account of Covid-19 pandemic:

- Deferment of capacity charges for power not scheduled, to be payable without interest after the end of the lockdown period in three equal monthly instalments.
- Rebate of about 20-25% on power supply billed (fixed cost) to Discoms and inter-state transmission charges levied by PGCIL.

4.86 Accordingly, Petitioner has written to various Central Public Sector Generation Companies, but till date no confirmation about the percentile of rebate or its applicability to the privatised DISCOMs was received from Central Generating Stations. In absence of such confirmation, it would not be possible to consider the same in the projections of the Aggregate Revenue Requirement for FY 2020-21 as during the past, the benefit of such scheme was not extended to the privatised DISCOMs. The Petitioner will keep the Hon'ble Commission updated on any further development on the subject matter.

### **Total Power Purchase Cost:**

4.87 The total power purchase cost during FY 2020-21 is tabulated below:

**Table 4- 14: Total Power Purchase Cost**

Particulars	Projections for FY 2020-21					
	Energy Purchase MU	AFC Rs. Crore	Energy Charges Rs. Crore	Other Charges Rs. Crore	Total PPC Rs. Crore	Total PPC Rs./kWh
<b>Existing Sources</b>						
NTPC Ltd.	6804	1239	2167	28	3434	5.05
NHPC Ltd.	1014	121	131	39	291	2.87
NPCIL	390	0	132	8	140	3.59
SJVNL	287	29	33	0	62	2.15
THDC	218	44	53	0	97	4.46
PTC	178	0	58	0	58	3.28
DVC	971	181	249	0	430	4.43
<b>Power stations in Delhi</b>	2136	541	958	0	1498	7.36
APCL	42	11	17	0	28	6.74
UMPP	495	7	57	6	70	1.41
SECI	44	0	24	0	24	5.50
<b>New Sources</b>						

Particulars	Projections for FY 2020-21					
	Energy Purchase MU	AFC Rs. Crore	Energy Charges Rs. Crore	Other Charges Rs. Crore	Total PPC Rs. Crore	Total PPC Rs./kWh
TapovanVishnugad	49	0	21		21	4.35
INOX	72	0	25		25	3.53
<b>Total</b>	<b>12700</b>	<b>2174</b>	<b>3926</b>	<b>81</b>	<b>6181</b>	<b>4.87</b>
Short-Term purchase	659		240		240	3.65
Short Term Sale	770		169		169	2.20
Transmission Charges	-427	1087			1087	
<b>Grand-Total</b>	<b>12163</b>	<b>3260</b>	<b>3997</b>	<b>81</b>	<b>7339</b>	<b>6.03</b>

4.88 The Petitioner requests the Hon'ble Commission to allow the power purchase cost during FY 2020-21 as per the aforesaid table.

### Re-allocation of Power Stations

4.89 The Hon'ble Commission has specified in its Regulation 121 (4) of Tariff Regulations, 2017 regarding re-allocation of power as follows:

*" 4) The gap between average Power Purchase Cost of the power portfolio allocated and average revenue due to different consumer mix of all the distribution licensee: Provided that the Commission may adjust the gap in power purchase cost by reassigning the allocation of power amongst the distribution licensees out of the overall power portfolio allocated to the National Capital Territory of Delhi by Ministry of Power, Government of India."*

4.90 As per Tariff Order of the Hon'ble Commission the difference between the average revenue, Power Purchase cost and gap of the Petitioner is tabulated below:

**Table 4- 15: Difference between ABR and Average Power Purchase Cost**

Particulars	BRPL
Avg. Power Purchase Cost (Rs./kWh)	5.08
Average Billing Rate (Rs./kWh)	7.11
Gap (Rs./kWh)	2.03

4.91 The Petitioner requests the Hon'ble Commission to balance the said gap as compared to other evenly placed DISCOMs, and re-allocate the Power Portfolio as per applicable Regulations.

**Few possible solutions to balance the gap:**

- 4.92 In order to balance the gap and to make level playing field across the Discoms, the Petitioner requests the Hon'ble Commission to increase allocation from cheap stations i.e. Sasan, Rihand, Singrauli etc. to the Petitioner and decrease allocation from costly stations i.e. PPCL (Bawana), Dadri-I, Dadri-II, GT and APCPL-Jhajjar.
- 4.93 It is pertinent to mention that the Gas turbine (GT) State generating station is not directly physically connected to the Petitioner network, it is directly connected with Other Distribution Company of Delhi. This has led to wide variation in over-drawl / under-drawl in the Petitioner's area which is affecting the Scheduling of the Petitioner. Hence, the Petitioner requests the Hon'ble Commission to allocate entire Petitioner's share of GT station to the concerned Discom directly (physically).

**Operation and Maintenance (O&M) Expenses**

- 4.94 As regards, O&M Expenses, DERC Tariff Regulations, 2017 states as under:

*"87. The Utilities shall be allowed Operation and Maintenance expenses on normative basis including expenses for raising the loan for funding of Working Capital and Regulatory Asset as specified by the Commission in the Business Plan Regulations for the respective Control Period:*

*Provided that the Normative O&M expenses for the respective Control Period shall not be trued up;*

*Provided further that the water charges, statutory levy and taxes under O&M expenses if indicated separately in the audited financial statement shall not form part of Normative O&M expenses.*

*88. Escalation to be allowed for adjustment towards increase in inflation, consumer price index (CPI), wholesale price index (WPI) etc. shall be as specified in the Business Plan Regulations for the respective Control Period.*

*89. Normative Operation and Maintenance expenses of a new Generating Entity shall be as per the norms approved by the CERC in Central Electricity Regulatory Commission (Terms and Conditions of Tariff) Regulations, 2014 as amended from time to time, for respective year unless specifically approved by the Commission.*

*90. Normative Operation and Maintenance expenses of existing Generating Entity shall be as specified in the Business Plan Regulations for the respective Control Period.*

*91. The Commission shall specify the target for Normative Operation and Maintenance expenses of the Transmission Licensee in the Business Plan Regulations for the respective Control Period.*

*Provided that the Commission may specify Normative Operation and Maintenance expenses target of a Transmission Licensee on the basis of number of Bays and Circuit Kilometres.*

*92. Normative Operation and Maintenance expenses of a Distribution License shall consist of:*

*(a) Employee Expenses;*

*(b) Administrative and General Expenses; and*

*(c) Repair and Maintenance Expenses.*

*93. Normative Operation and Maintenance expenses of a Distribution Licensee for a Control Period shall be derived on the basis of audited Operation and Maintenance expenses for last five (5) completed Financial Years vis-a-vis normative Operation and Maintenance expenses allowed by the Commission during the corresponding period based on the following parameters:*

*(a) Load growth,*

*(b) Consumer growth,*

*(c) Commercial loss,*

*(d) Distribution loss,*

*(e) Inflation,*

*(f) Efficiency,*

*(g) Capital base and,*

*(h) Any other factor.”*

4.95 Regulation-23 of the DERC Business Plan Regulations, 2019 states as under:

*“23. Operation and Maintenance Expenses*

*(1) Normative Operation and Maintenance Expenses in terms of Regulation 4(3) and Regulation 92 of the DERC (Terms and Conditions for determination of Tariff) Regulations, 2017 for the Distribution Licensees shall be follows:*

**Table 8: O&M Expenses for BRPL for the Control Period**

<b>Particulars</b>	<b>Unit</b>	<b>2020-21</b>	<b>2021-22</b>	<b>2022-23</b>
66 kV Line	Rs. Lakh/ Ckt. Km	<b>3.855</b>	4.002	4.156
33 kV Line	Rs. Lakh/ Ckt. Km	<b>3.855</b>	4.002	4.156
11 kV Line	Rs. Lakh/ Ckt. Km	<b>1.150</b>	1.194	1.239
LT lines system	Rs. Lakh/ Ckt. Km	<b>6.148</b>	6.384	6.629
66/11 kV Grid S/s	Rs. Lakh/ MVA	<b>1.033</b>	1.073	1.114
33/11 kV Grid S/s	Rs. Lakh/ MVA	<b>1.033</b>	1.073	1.114
11/0.415 kV DT	Rs. Lakh/ MVA	<b>2.563</b>	2.661	2.763

(2) The Distribution Licenses shall be allowed own (Auxiliary) consumption including e-vehicle charging stations installed at Distribution Licensee offices and sub-stations, at zero tariff for actual recorded consumption subject to a maximum of 0.25% of total sales to its retail consumers for the relevant financial year as part of O&M expenses for the relevant year.

(3) Actual recorded own (Auxiliary) consumption in excess of 0.25% of total sales to its retail consumers for the relevant financial year, shall be billed at Non Domestic Tariff of respective year's Tariff schedule and shall form part of revenue billed and collected for the same year.

(4) The Distribution Licensee shall be allowed O&M expenses for a particular financial year of the control period by multiplying the norms for O&M expenses of that particular year with the respective average network capacity during the financial year i.e. (average of network capacity at start of Financial year and network capacity at the end of Financial year).

(5) The impact of difference of amount on account of actual implementation of Seventh Pay Revision and Interim Relief already considered for determination of norms for O&M Expenses, if any, shall be allowed separately in line with the methodology adopted for computation of norms for O&M Expenses, at the time of True up of ARR for relevant Financial year subject to prudence check.

(6) The Distribution Licensee may claim the expenses for raising loan for working capital and regulatory assets under O&M expenses separately, subject to prudence check at the time of true up on submission of documentary evidence:

Provided that if this amount has been included in the interest on working capital and/or Regulatory assets, the same shall not be allowed.

(7) The Distribution Licensee may claim the legal expenses separately, subject to prudence check at the time of true up on submission of documentary evidence:

*Provided that the legal expenses on account of cases filed against the Orders or Regulations of the Commission before any Court and the legal claims (compensation/penalty) paid to the consumer, if any, shall not be allowed.*

(8) The Distribution Licensee shall allocate the O&M expenses on actual basis under the heads of lines and grid substation voltage wise as specified for determination of norms for O&M expenses:

*Provided that the Distribution Licensee shall submit the above details of O&M expenses within thirty (30) days from the end of finalization of audited accounts of the relevant year."*

- 4.96 The line and transformation capacity proposed by the Petitioner in its Business Plan Petition at the end of FY 2020-21 are as below:

**Table 4- 16: Network Capacity at end of FY 2020-21**

Particulars	Units	Projections
66 kV Line	ckt. Km	1172
33 kV Line	ckt. Km	
11 kV Line	ckt. Km	7901
LT Line System	ckt. Km	12678
66/11 kV Grid S/s	MVA	6540
33/11 kV Grid S/s	MVA	
11/0.415 kV DT	MVA	5287

- 4.97 Further, the Petitioner vide its Letter No. RA/2019-20/01/A/424 dated 14.11.2019 had provided the Hon'ble Commission with the details of Network Capacity for the period FY 2019-20 to FY 2024-25. Accordingly, the Line and Transformation capacity as provided by the Petitioner to the Hon'ble Commission is tabulated as under:

**Table 4- 17: Average Network Capacity**

Particulars	Units	FY 2019-20	FY 2020-21 Projections	Average
66 kV Line	ckt. Km	1155	1172	1164
33 kV Line	ckt. Km			
11 kV Line	ckt. Km	7668	7901	7785
LT Line System	ckt. Km	12238	12678	12458

Particulars	Units	FY 2019-20	FY 2020-21 Projections	Average
66/11 kV Grid S/s	MVA	6191	6540	6365
33/11 kV Grid S/s	MVA			
11/0.415 kV DT	MVA	5121	5287	5204

4.98 The Petitioner has, therefore, applied the norms approved for FY 2020-21 in the Business Plan Regulations, 2019 to the respective average network capacity for FY 2020-21 as tabulated below:

*Table 4- 18: O&M Expenses estimated during FY 2020-21 (Rs. Cr.)*

Assets/ lines	Avg. Quantity	Units	Norms	Amount
66 kV lines	1164	Rs. Lakh/ ckt km	3.855	45
33 kV lines		Rs. Lakh/ ckt km		
11 kV lines	7785	Rs. Lakh/ ckt km	1.150	90
LT lines system	12458	Rs. Lakh/ ckt km	6.148	766
33/11 kV grid sub-station	6365	Rs. Lakh/ MVA	1.033	66
66/11 kV grid sub-station		Rs. Lakh/ MVA		
11/0.415 kV DT	5204	Rs. Lakh/ MVA	2.563	133
<b>Total</b>				<b>1099</b>

4.99 The Petitioner requests the Hon'ble Commission to allow the above sated O&M Expenses in the ARR for FY 2020-21 in addition to the additional expenses enumerated below.

#### Additional Expenses

4.100 As regards additional expenses, Regulation-11 of DERC Tariff Regulations, 2017 states as under:

*"11. The Distribution Licensee shall submit Annual Tariff Petition, at least, one hundred and fifty (150) days prior to the end of relevant financial year which shall contain:*

*...*

*(9) Actual and expected additional expenses on account of O&M beyond the control of Distribution Licensee for the ensuing & previous year respectively;*

*..."*

4.101 As regards projection of O&M Expenses, Regulation-87 of DERC Tariff Regulations, 2017 states as under:



“87....

*Provided that the Normative O&M Expenses for the respective Control Period shall not be trued up;*

*Provided further that the water charges, statutory levy and taxes under O&M Expenses if indicated separately in the audited financial statement shall not form part of Normative O&M Expenses.”*

- 4.102 Further Regulation-23 (5) of DERC Business Plan Regulations, 2019 states as under:

*“(5) The impact of difference of amount on account of actual implementation of Seventh Pay Revision and Interim Relief already considered for determination of norms for O&M Expenses, if any, shall be allowed separately in line with the methodology adopted for computation of norms for O&M Expenses, at the time of True up of ARR for relevant Financial year subject to prudence check.*

*...”*

**COVID-19 related expenses:**

- 4.103 Furthermore, the Petitioner has incurred certain expenses due to the COVID-19 scenario vis-à-vis Procurement of PPE kits, sanitization of office premises, vehicles etc. during FY 2020-21 which needs to be accounted for in the additional expenses and which never could have been nor were ever envisioned when the BPR norms were formulated. The said costs are subject to true-up based on actuals.

**Additional working capital requirement towards opening and maintaining of adequate Letter of Credit (LC) as Payment Security Mechanism under PPA:**

- 4.104 Ministry of Power vide Order dated June 28, 2019 has directed that in accordance with Section-28 (3) (a), the NLDC & RLDC shall despatch power only after it is intimated by the Generating Company and Distribution Companies that a letter of credit for the desired quantum of power has been opened . The concerned generating company shall be entitled to encash the LC after expiry of grace period, i.e., 45 to 60 days as provided in the PPA.
- 4.105 Currently DERC Tariff Regulations provides working capital norm only in such a manner that DISCOMs can pay the bills to Gencos so as to avoid any penalty. The

current working capital requirements norms compensate for 1 month of receivable only and thus, DISCOMs cannot even avail the rebate.

- 4.106 However as per MOP directions, the DISCOMs have to maintain adequate LC. As NTPC supplies 70% of the power to Delhi DISCOMs, the funding of such additional working capital is substantial and thus, is required to be allowed separately apart from norms of working capital specified in Tariff Regulations. The Petitioner has computed additional interest corresponding to one month PP Cost (estimated for FY 2020-21) on account of Central Generating Station and PGCIL as under:

*Table 4- 19: Interest on additional working capital requirement (Rs. Cr.)*

S. No	Particulars	Amount
1	Long term PP Cost	6,181
2	Less: Delhi Gencos PP Cost	698
3	Add: PGCIL Charges	776
4	Total PP Cost projected for FY 2020-21	6,259
5	Monthly PP Cost	522
6	Interest rate	12.9%
7	<b>Interest</b>	<b>67</b>

- 4.107 Accordingly the Petitioner requests the Hon'ble Commission to allow the aforesaid interest on additional working capital requirement as a matter of change in law.

**Other additional expenses**

- 4.108 For the purpose of projections, the Petitioner has considered actual additional O&M expenses incurred in FY 2018-19 and has escalated the same as per the rates approved by the Hon'ble Commission for FY 2019-20 and FY 2020-21.
- 4.109 The Petitioner has considered an escalation factor of 5.6% (as per DERC Business Plan Regulations, 2017) and 3.8% (as per DERC Business Plan Regulations, 2019) over actuals for FY 2018-19 to arrive at the additional O&M Expenses for FY 2020-21 as under.

*Table 4- 20: Additional O&M Expenses estimated for FY 2020-21 (Rs. Cr.)*

S. No	Addnl. O&M Expenses Projection	FY 2018-19 Actuals	FY 2019-20 (Escalated at 5.60%)	FY 2020-21 (Escalated at 3.80%)
1	Loss on Sale of Retired Assets	21.7	22.9	23.8
2	Arrears paid on account of 7th Pay Commission revision	58.6	61.9	64.3
3	Impact of Revision in Minimum Wages	42.5	44.8	46.6
4	Water Charges	8.7	9.2	9.5

S. No	Addnl. O&M Expenses Projection	FY 2018-19 Actuals	FY 2019-20 (Escalated at 5.60%)	FY 2020-21 (Escalated at 3.80%)
5	Property Tax	2.4	2.5	2.6
6	GST Charges	30.1	31.8	33.0
7	SMS Charges	1.1	1.2	1.2
8	Legal Expenses	17.5	18.5	19.2
9	Legal Fees	1.7	1.8	1.9
10	DSM charges	1.2	1.3	1.3
11	KYC Expenses	4.3	4.5	4.7
12	Licensee Fees paid on Assets	7.2	7.6	7.8
13	Geo-Spatial Fees	0.3	0.3	0.3
14	COVID-19 Expenses	-	-	10.0
15	Interest corresponding to advance payment to PP Generators not covered in normal WC			67.3
16	<b>Total</b>	<b>197</b>	<b>208</b>	<b>293</b>

4.110 The Petitioner requests the Hon'ble Commission to allow the aforesaid impact in the ARR of FY 2020-21.

### **Capital Expenditure and Capitalization**

4.111 As regards, Capital Investment, Regulation-24 (1) of DERC Business Plan Regulations, 2019 states as under:

*"24. Capital Investment Plan*

*(1) The tentative Capital Investment Plan in terms of Regulation 4 (4) of the DERC (terms and conditions for determination of tariff) Regulations, 2017 for the Distribution Licensee shall be as follows:*

**Table 12: Capitalisation for BRPL for the Control Period (in Rs. Cr.)**

Particulars	2020-21	2021-22	2022-23	Total
Capitalization	641	634	802	2077
Smart Meter	50	52	55	157
Less: Deposit Work	67	81	67	215
<b>Total</b>	<b>624</b>	<b>605</b>	<b>790</b>	<b>2,019</b>

.."

4.112 The Petitioner in its Business Action Plan for FY 2020-21 to FY 2024-25 had proposed the capital expenditure for Performance Obligation, Power Reliability and Infrastructure development as below:

**Table 4- 21: Capital Expenditure and Capitalisation proposed by the Petitioner in the Business Plan (Rs. Cr.)**

Description	Sub Head	FY 2020-21	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
<b>Performance Obligation</b>	Load Growth	341	341	543	495	408
	Metering	50	52	55	57	60
	Deposit Scheme	67	67	67	67	67
	<b>Sub-Total</b>	<b>458</b>	<b>460</b>	<b>665</b>	<b>619</b>	<b>535</b>
<b>Power Reliability</b>	System Improvement	100	97	78	78	79
	CMS (EV & Solar)	2	3	8	11	11
	Automation DMS	53	57	53	53	53
	<b>Sub-Total</b>	<b>155</b>	<b>157</b>	<b>138</b>	<b>141</b>	<b>143</b>
<b>Infrastructure Development</b>	IT & Communication	52	43	25	22	21
	Civil Infrastructure	14	16	16	17	18
	Admin & Vehicle	9	10	10	11	12
	Test Equipment, Tools & Tackles	2	2	2	2	2
	<b>Sub-Total</b>	<b>77</b>	<b>70</b>	<b>53</b>	<b>52</b>	<b>53</b>
<b>Total</b>		<b>691</b>	<b>686</b>	<b>857</b>	<b>812</b>	<b>730</b>
<b>Capitalisation</b>		<b>733</b>	<b>687</b>	<b>823</b>	<b>821</b>	<b>747</b>

4.113 The Loss Reduction Plan as proposed by the Petitioner in the Business Action Plan for FY 2020-21 to 2024-25 is as below:

**Table 4- 22: Distribution Loss Targets proposed by the Petitioner in the Business Plan**

Particulars	FY 2020-21	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
<b>Distribution Loss trajectory</b>	9.28%	9.07%	8.86%	8.66%	8.47%

4.114 It is clear that the Hon'ble Commission in its Business Plan Regulations, 2019 has reduced the Distribution Loss Targets and has also reduced the capitalisation as proposed in the Business Plan. This may prove detrimental to achievement of reduction in loss targets as approved in the Business Plan. In order to meet such stringent loss targets, the Hon'ble Commission should at least allow the capitalisation as proposed by the Petitioner in the Business Plan without any curtailment.

- 4.115 However, the Petitioner has considered the gross capitalisation of Rs. 624 Crore including consumer contribution (Deposit work) during FY 2020-21 as approved by the Hon'ble Commission, provided that the same may be trued-up based on the actuals incurred to meet the loss targets issued by the Commission for FY 2020-21.
- 4.116 The Petitioner would also like to bring to the notice of the Hon'ble Commission that due to the present circumstances (COVID-19 scenario), the DISCOM ought not be made accountable and/or liable for any penalty on account of variation in projected vis-a-vis trued up capitalization by more than 10% during the year inter-alia due to the following reasons:
- a) It is a Force Majeure Condition.
  - b) Many factories and industries are shut on account of the Lockdown imposed by the Ministry of Home Affairs, Government of India due to COVID-19 because of which all necessary CAPEX related materials/ items could not be procured for reasons not attributable to the Petitioner and beyond its reasonable control;
  - c) Furthermore, due to large number of migrant labourers moving out to their native states, the Petitioner was unable to undertake any major CAPEX related works in its licensed area;
  - d) The cash flow of the Petitioner has reduced on account of Orders passed by Hon'ble Commission and persistent Lockdown conditions. Consequently the CAPEX undertaken by the Petitioner may be lesser, as it has direct relation with the amount of Cash Flow;
  - e) Despite several requests for providing sufficient space to the Petitioner for electrical installations and for expansion of electrical infrastructure, there is little progress.

### **Consumer Contribution**

- 4.117 The Petitioner in its Business Action Plan for FY 2020-21 to 2024-25 had proposed a consumer contribution capitalised at Rs. 67 Cr. based on the average value over the past five years. The Petitioner requests the Hon'ble Commission to approve the same for FY 2020-21.

### **Grants**

- 4.118 The Hon'ble Commission in DERC Business Plan Regulations, 2019 has not estimated any receipts of grants during FY 2020-21. Accordingly, the Petitioner has not considered any grants for the purpose of computation of Regulated Rate Base for FY 2020-21.

### **Depreciation**

- 4.119 The Hon'ble Commission in its Tariff Regulations, 2017 has specified different rates of depreciation depending upon the class and life of assets. Unlike the

previous Regulations, DERC Tariff Regulations, 2017 do not contain the concept of Advance Against Depreciation. As per DERC Tariff Regulations, 2017, the assets shall attract a higher rate of depreciation till completion of 12 years of useful and after 12 years whereas the remaining depreciation shall be uniformly distributed over the remaining useful life.

4.120 Since FY 2017-18 is the first Financial Year for which these Regulations are applicable, the Petitioner has worked out the depreciation by applying these class-wise rates based on the useful life of the existing assets. Accordingly, the average rate of depreciation comes to be 4.76%. The Petitioner has applied rate of 4.76% on the average GFA estimated for FY 2020-21. However, the depreciation rate of 4.76% so computed, may undergo change at the end of FY 2020-21 based on actual capitalization.

4.121 The depreciation claimed for FY 2020-21 is tabulated below:

*Table 4- 23: Depreciation for FY 2020-21 (Rs. Crore)*

S. No	Particulars	FY 2020-21	Remarks/ Reference
<b>A</b>	<b>Gross Fixed Assets (GFA)</b>		
<b>I</b>	Opening Balance	7657	Closing for FY 2018-19 + Approved addition for FY 2019-20
<b>II</b>	Additions during the year	624	Business Plan Regulations, 2019
<b>III</b>	Closing Balance	8281	i+ii
<b>IV</b>	Average Balance	7969	(i+iii)/2
<b>B</b>	<b>Consumer Contribution</b>		
<b>V</b>	Opening Balance	790	Closing for FY 2018-19 + Approved addition for FY 2019-20
<b>VI</b>	Additions during the year	67	Business Plan Regulations, 2019
<b>VII</b>	Closing Balance	857	v+vi
<b>VIII</b>	Average Balance	824	(v+vii)/2
<b>C</b>	<b>GFA net of consumer contribution</b>	<b>7146</b>	iv-viii
<b>D</b>	Average rate of depreciation	4.76%	
<b>E</b>	<b>Depreciation</b>	<b>340</b>	<b>C x D</b>

4.122 The Petitioner requests the Hon'ble Commission to allow the depreciation as computed above in the ARR for FY 2020-21.

### **Advance Against Depreciation**

4.123 DERC Tariff Regulations, 2017 does not provide for Advance Against Depreciation. Hence, the Petitioner has not considered any Advance Against Depreciation for FY 2020-21.

## Means of finance for new investments

4.124 The Petitioner has considered the funding of capitalisation through consumer contribution, debt and equity. The consumer contribution has been considered first for financing of capitalisation and then the rest capitalisation has been considered to be funded in debt-equity ratio of 70:30. The means of finance for capitalization during FY 2020-21 is tabulated below:

*Table 4- 24: Means of Finance for FY 2020-21 (Rs. Cr.)*

S. No	Particulars	FY 2020-21	Remarks/ Reference
<b>A</b>	Capitalisation during the year	624	Business Plan Regulations, 2019 (Table-12)
<b>B</b>	Means of finance		
<b>i</b>	Consumer contribution	67	Business Plan Regulations, 2019 (Table-12)
<b>ii</b>	Grants	0	
<b>C</b>	Net	557	(A-B.i-B.ii)
<b>i</b>	Internal Accruals	167	C x 0.3
<b>ii</b>	Debt	390	C x 0.7

## Working Capital

4.125 The Working Capital for FY 2020-21 has been calculated in accordance with Regulation-84 (4) of the DERC Tariff Regulations, 2017.

4.126 The Working Capital calculation for FY 2020-21 is tabulated below:

*Table 4- 25: Working Capital for FY 2020-21 (Rs. Crore)*

S. No	Particulars	FY 2020-21	Remarks/ Reference
<b>A</b>	Receivables from sales of electricity	10353	
<b>B</b>	Receivables equivalent to 2 months of revenue from wheeling charges and sale of electricity	1726	(A)/ 12 X 2
<b>C</b>	Less: Net purchase expenses (incl. Transmission Charges)	8110	
<b>D</b>	Less: One month power purchase expenses (incl. Transmission Charges)	676	(C)/12
<b>E</b>	<b>Total Working Capital</b>	1050	(B-D)
<b>F</b>	Less: Opening Working Capital	956	
<b>G</b>	<b>Change in Working Capital</b>	<b>94</b>	<b>(E-F)</b>



- 4.127 The Petitioner requests the Hon'ble Commission to consider the working capital as stated above in computation of ARR for FY 2020-21.

### **Regulated Rate Base (RRB)**

- 4.128 Based on the above discussions / computations, the Regulated Rate Base (RRB) for FY 2020-21 is tabulated below:

*Table 4- 26: Regulated Rate Base for FY 2020-21 (Rs. Crore)*

S. No	Particulars	FY 2020-21	Remarks/Reference
<b>A</b>	Opening Original Cost of Fixed Assets (OCFAo)	7657	(Closing value proposed for FY 2018-19 + Addition approved for FY 2019-20)
<b>B</b>	Opening Accumulated depreciation (ADo)*	3331	
<b>C</b>	Opening consumer contributions received (CCo)	790	
<b>D</b>	Opening Working capital (WCo)	956	
<b>E</b>	Opening RRB (RRBo)	4492	(A-B-C+D)
<b>F</b>	Investment capitalised during the year (INVi)	624	Table 4.24
<b>G</b>	Depreciation during the year (Di)	340	Table 4.23
<b>H</b>	Depreciation on decapitalised assets during the year		
<b>I</b>	Consumer contribution during the year (CCi)	67	Table 4.24
<b>J</b>	Fixed assets retired/decapitalised during the year(Reti)		
<b>K</b>	Change in capital investment ( $\Delta$ ABi)	217	(F-G+H-I-J)
<b>L</b>	Change in working capital during the year ( $\Delta$ WCi)	94	Table 4.25
<b>M</b>	RRB Closing	4803	E+K+L
<b>N</b>	<b>RRBi</b>	<b>4694</b>	<b>E+K/2+L</b>

### **Equity and Debt**

- 4.129 The Hon'ble Tribunal has directed the Hon'ble Commission to consider the repayment of loan for computation of average loan balance for the year. Accordingly, the Petitioner has considered repayment as 1/10th of opening balance of loan. The relevant portion of Hon'ble APTEL's judgment on Appeal No. 61 of 2012 on November 28, 2014 is reproduced below:

*"102. In the light of above discussions we find force in the contentions of the Appellant and direct the Commission to re-evaluate the WACC considering the repayment of loans during the period and recomputed RoCE payable to the Appellant. The issue is decided in favour of the Appellant."*

- 4.130 In accordance with Proviso to Regulation-70 of DERC Tariff Regulations, 2017, the Petitioner has considered the funding of working capital through 100% debt.

*"70. The WACC for each year of the Control Period shall be computed at the start of the Control Period in the following manner:*

...

*Provided that the Working capital shall be considered 100% debt financed for the calculation of WACC;*

*...*

- 4.131 Accordingly, the average equity and average debt for FY 2020-21 is tabulated below:

**Table 4- 27: Equity and Debt for FY 2020-21 (Rs. Crore)**

S. No	Particulars	FY 2020-21
<b>1</b>	Equity	
<b>I</b>	Opening	2187
<b>II</b>	Additions	167
<b>III</b>	Closing	2354
<b>IV</b>	Average	2270
<b>2</b>	Debt	
<b>I</b>	Opening	2542
<b>II</b>	Additions	483
<b>A</b>	<i>Capitalization</i>	390
<b>B</b>	<i>Working Capital</i>	94
<b>III</b>	Less : Repayment	254
<b>IV</b>	Closing	2771
<b>V</b>	Average	2657

### **Weighted Average Cost of Capital**

- 4.132 As regards computation of WACC, Regulation-70 of DERC Tariff Regulations, 2017 states as under:

*“70. The WACC for each year of the Control Period shall be computed at the start of the Control Period in the following manner:*

$$WACC = \left[ \frac{D}{D+E} \right] * r_d + \left[ \frac{E}{D+E} \right] * r_e$$

*Where,*

*D is the amount of Debt derived as per these Regulations;*

*E is the amount of Equity derived as per these Regulations;*

*...*

*rd is the Cost of Debt;*

*re is the Return on Equity.”*

- 4.133 As regards rate of interest, Regulation-22 (1) of DERC Business Plan Regulations, 2019 states as under:

**“22. MARGIN FOR RATE OF INTEREST ON LOAN**

*(1) Margin for rate of interest for the Control Period in terms of (1) The rate of interest on loan for a financial year shall be Marginal Cost of Fund based Lending Rate (MCLR) of SBI as on 1st April of that financial year plus the Margin. The Margin, in terms of Regulation 4(2) of the DERC (Terms and Conditions for Determination of Tariff) Regulations, 2017 towards capitalisation of Assets, Working Capital and Regulatory Assets for Distribution Licensee, is allowed as the difference between the weighted average rate of interest on actual loan portfolio and the MCLR as on 1st April of that financial year:*

*Provided that the Margin shall not exceed 5.00%, 4.25% and 3.50% for the first, second and third year of the control period, respectively:*

*Provided further that the rate of interest on loan (MCLR plus Margin) in any case shall not exceed approved base rate of return on equity i.e. 14.00%.”*

- 4.134 Accordingly, the Petitioner has considered the rate of interest on debt during FY 2020-21 equivalent to 12.90% as per DERC Business Plan Regulations, 2019 since the actual loans are expected to be costlier.
- 4.135 The Petitioner in accordance with Regulation 72 of DERC Tariff Regulations, 2019 has also considered the rate of Return on Equity on pre-tax basis using Corporate Tax rate applicable to it as the effective tax rate.
- 4.136 The WACC during FY 2020-21 has been computed below:

**Table 4- 28: Weighted Average Cost of Capital (WACC) for FY 2020-21 (Rs. Cr.)**

S. No	Particulars	FY 2020-21	Remarks/ Reference
<b>A</b>	Average Equity	2270	Table 4.27
<b>B</b>	Average Debt	2657	
<b>C</b>	Total	4927	(A+B)
<b>D</b>	Return on equity	16.00%	
<b>E</b>	Income Tax Rate	17.47%	
<b>F</b>	Grossed up Return on Equity	19.39%	D/(1-E)
<b>G</b>	Rate of Interest on Debt	12.90%	
<b>F</b>	<b>Weighted average cost of Capital</b>	<b>15.89%</b>	<b>((A/C)*F)+((B/C)*G)</b>

## Return on Capital Employed (RoCE)

4.137 The Petitioner has computed RoCE during FY 2020-21 as under:

*Table 4- 29: RoCE for FY 2020-21 (Rs. Crore)*

S. No	Particulars	FY 2020-21	Remarks/ Reference
<b>A</b>	RRB (i)	4694	Table 4.26
<b>B</b>	WACC	15.89%	Table 4.28
<b>C</b>	<b>RoCE</b>	<b>746</b>	<b>(A*B)</b>

## Non-Tariff Income

4.138 The Non-Tariff Income and income from other business during FY 2020-21 has been considered equivalent to actual NTI during FY 2018-19 as shown below:

*Table 4- 30: Non-Tariff Income for FY 2020-21 (Rs. Cr.)*

S. No	Particulars	FY 2020-21	Remarks/ Reference
<b>1</b>	Non-Tariff Income	157.60	NTI for FY 2018-19

## Carrying cost on revenue gap

4.139 Regulation 22 of the DERC Business Plan Regulations, 2019 provides that the rate of interest on loan shall not exceed approved base rate of return on equity for wheeling business i.e., 14%.

4.140 Accordingly, the Petitioner has considered the rate of carrying cost as 14%.

## Aggregate Revenue Requirement

4.141 Based upon the above discussion, the Aggregate Revenue Requirement during FY 2020-21 is tabulated as under:

*Table 4- 31: Aggregate Revenue Requirement for FY 2020-21 (Rs. Cr.)*

S. No	Particulars	FY 2020-21	Remarks/ Reference
<b>A</b>	Net Power Purchase Cost including Transmission and SLDC Charges	7339	Table 4.14
<b>B</b>	O&M Expenses	1099	Table 4.18
<b>C</b>	Additional O&M Expenses	293	Table 4.20
<b>E</b>	Depreciation	340	Table 4.23
<b>F</b>	Return on Capital Employed (RoCE)	746	Table 4.29
<b>G</b>	Less: NTI	158	Table 4.30
<b>H</b>	<b>Aggregate Revenue Requirement</b>	<b>9,660</b>	<b>SUM (A to F)-G</b>

## Revenue (Gap)/ Surplus

4.142 The Revenue (Gap)/ Surplus for FY 2020-21 is computed as under:

*Table 4- 32: Revenue (Gap) for FY 2020-21 (Rs. Cr.)*

S. No	Particulars	Submission	Reference
<b>A</b>	ARR for FY 2020-21	9,660	Table 4.31
<b>B</b>	Revenue available towards ARR	7424	Table 4.4
<b>C</b>	Collection Efficiency	91.12%	
<b>D</b>	Estimated Revenue Realisation	6765	D=B*C
<b>E</b>	<b>Revenue (Gap)/ Surplus</b>	<b>-2,895</b>	<b>E=D-A</b>



## TARIFF PROPOSAL FOR FY 2020-21

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## Tariff Proposal for FY 2020-21

### Background

- 5.1 Under Section 62 (1) of the 2003 Act, determination of tariff for Electricity Distribution Business/ Retail Tariff is the sole prerogative of the Hon'ble Commission. Therefore, in the treatment of Revenue Gap as proposed by the Petitioner, the Hon'ble Commission has the final say while finalizing tariff for Wheeling of Electricity and Retail Supply.
- 5.2 Despite continuous yearly tariff determination exercises undertaken by the Hon'ble Commission, there remains a huge unrecovered Regulatory Assets which is yet to be realized in terms of recovery through tariffs.
- 5.3 As is evident from the Petitioner's own past experience, the increase in Regulatory Assets has been mainly on account of increase in power purchase expenses. A simple comparison of Power purchase cost projected / allowed by the Hon'ble Commission on a year-to-year basis vis-à-vis the actual power purchase cost incurred by the Petitioner for respective financial years (as approved by this Hon'ble Commission during true-up exercise) shows a consistent trend wherein the projected power purchase cost always fell far short of the actual cost that was incurred by the Petitioner, as shown in the table below:

**Table 5- 1 : Power Purchase Cost-ARR versus Truing-up (Rs. Crore)**

S. No	Particulars	Power Purchase Cost		
		ARR	True Up	Deficit
1	FY 2007-08	2298	2566	-268
2	FY 2008-09	2390	2616	-226
3	FY 2009-10	2473	3558	-1085
4	FY 2010-11	2479	4081	-1602
5	FY 2011-12	4527	5615	-1088
6	FY 2012-13	4891	5621	-730
7	FY 2013-14	5217	5873	-656
8	FY 2014-15	5944	6781	-837
9	FY 2015-16	6583	6177	406
10	FY 2016-17	6583	6719	-136
11	FY 2017-18	6620	6738	-118
12	<b>Total</b>	<b>50005</b>	<b>56345</b>	<b>-6340</b>

- 5.4 The only exception being FY 2015-16 during which the Petitioner incurred significantly lower Power purchase cost due to late implementation of CERC's Regulations and entire credit being passed to the Petitioner for the interim period during this FY. This however, was an exception as evident from the fact that the

deficit in the Power purchase cost reoccurred from the subsequent FYs and continues till date.

- 5.5 The Petitioner has endeavoured to raise loans to fund the revenue gap on account of increase in power purchase cost and to the extent of Regulatory Asset recognised. The Regulatory Assets are nothing but cost incurred (primarily power purchase cost) in the previous years by the Petitioner as approved by Hon'ble Commission, which is yet to be recovered through tariff. The Petitioner is continuously requesting the Hon'ble Commission to amortise the Regulatory Assets.
- 5.6 Despite the Petitioner's best efforts in raising loans, lenders have been getting increasingly reluctant in extending credit to the Petitioner owing to substantial unamortized Regulatory assets which in turn has a bearing on the credit rating of the Petitioner.
- 5.7 In view of the aforesaid submissions, it becomes all the more necessary that the Revenue Gap is allowed to be amortised by the Hon'ble Commission. In that backdrop, the Petitioner is proposing amortisation of Revenue Gap in the following two parts:
- Revenue Gap upto FY 2018-19 to be recovered through a suitable surcharge on the Regulatory Assets including carrying cost as explained in para 5.9.
  - Suitable cost reflective tariffs to take care of entire estimated standalone revenue gap during FY 2020-21.

### **Revenue (Gap)/ Surplus of DISCOM upto FY 2018-19**

- 5.8 Revenue (Gap)/ Surplus till FY 2018-19 is tabulated below:

*Table 5- 2 : Revenue (Gap)/ Surplus till FY 2018-19 (Rs. Crore)*

S. No.	Particulars	FY 2018-19
<b>A</b>	<b>RA Creation</b>	
1	Opening RA for FY 2018-19	3979
2	Revenue Gap during FY 2018-19	799
3	Rate of carrying cost	14%
4	Carrying cost accrued during the year	613
5	Amortisation through 8% surcharge	721
6	Amortisation of carrying cost	420
8	Closing RA for FY 2018-19 on stand-alone basis	4250
<b>9</b>	<b>Add:</b>	

S. No.	Particulars	FY 2018-19
A	Impact of past claims upto FY 2017-18 as per Table 1B13 of True-up Petition for FY 2018-19	14308
B	Carrying cost on past claims during FY 2018-19	2003
<b>10</b>	<b>Total closing RA for FY 2018-19</b>	<b>20561</b>

- 5.9 Without prejudice to the Writ Petition (C) No. 104 of 2014 filed before Hon'ble Supreme Court of India, the Petitioner requests the Hon'ble Commission to adjust 8% surcharge so as to ensure recovery within the time-frame specified in the amortization plan submitted before Hon'ble Supreme Court of India.
- 5.10 Further, the Petitioner requests the Hon'ble Commission to allow the carrying cost on Regulatory Assets recognized till FY 2018-19 as per directions given by Hon'ble Tribunal in Appeal 153 of 2009 and O.P. 1 of 2011, through a separate surcharge.

### Revenue at existing tariff for FY 2020-21

- 5.11 The methodology adopted for computation of revenue at existing tariffs for FY 2020-21 has been detailed in Chapter-4 of this Petition.
- 5.12 The revenue estimated on account of sales to various consumer categories during FY 2020-21 has been tabulated below:

*Table 5-3 : Revenue estimated during FY 2020-21 (Rs. Crore)*

S.No.	Tariff Category	Fixed Charges	Energy Charges	TOD Impact	Total Revenue
		Rs. Cr.	Rs. Cr.	Rs. Cr.	Rs. Cr.
<b>1</b>	<b>Domestic</b>	496	3,275	-	3,771
<b>1.1</b>	<b>Domestic</b>	473	3,161	-	3,634
<b>1.1.1</b>	<b>Upto2KWConnectedLoad</b>	60	1,386	-	1,446
	0-200Units	34	378		413
	201-400Units	18	527		545
	401-800Units	7	380		387
	801-1200Units	1	71		72
	Above1200Units	0	29		29
<b>1.1.2</b>	<b>&gt;2KWto≤5KWConnectedLoad</b>	85	655	-	739
	0-200Units	23	47		70
	201-400Units	30	166		196
	401-800Units	24	262		286
	801-1200Units	6	126		132
	Above1200Units	1	54		55

S.No.	Tariff Category	Fixed Charges Rs. Cr.	Energy Charges Rs. Cr.	TOD Impact Rs. Cr.	Total Revenue Rs. Cr.
<b>1.1.3</b>	<b>&gt;5KWto≤15KWConnectedLoad</b>	<b>235</b>	<b>859</b>	<b>-</b>	<b>1,094</b>
	0-200Units	50	19		70
	201-400Units	49	80		129
	401-800Units	68	232		300
	801-1200Units	35	203		238
	Above1200Units	33	325		358
<b>1.1.4</b>	<b>&gt;15KWto≤25KWConnectedLoad</b>	<b>44</b>	<b>114</b>	<b>-</b>	<b>158</b>
	0-200Units	4	0		4
	201-400Units	3	1		4
	401-800Units	6	5		12
	801-1200Units	7	11		17
	Above1200Units	24	97		122
<b>1.1.5</b>	<b>&gt;25KWConnectedLoad</b>	<b>50</b>	<b>146</b>		<b>196</b>
	0-200Units	2	0		2
	201-400Units	1	0		1
	401-800Units	2	1		3
	801-1200Units	2	2		4
	Above1200Units	42	143		186
<b>1.2</b>	<b>SingleDeliveryPointon11KVforGHS</b>	<b>20</b>	<b>92</b>		<b>112</b>
<b>1.3</b>	<b>Hospital(11KV)</b>	<b>3</b>	<b>14</b>		<b>17</b>
<b>1.4</b>	<b>Worship(11KV)</b>	<b>0</b>	<b>2</b>		<b>2</b>
<b>1.5</b>	<b>DVB Staff</b>	<b>0</b>	<b>6</b>		<b>7</b>
<b>2</b>	<b>Non Domestic</b>	<b>802</b>	<b>1,784</b>	<b>14</b>	<b>2,600</b>
2.1	Upto3kVA	112	111	1	224
2.2	Above3Kva	690	1,673	13	2,375
<b>3</b>	<b>Industrial</b>	<b>94</b>	<b>315</b>	<b>3</b>	<b>412</b>
<b>4</b>	<b>Agriculture</b>	<b>4</b>	<b>3</b>	<b>-</b>	<b>8</b>
<b>5</b>	<b>Mushroom&amp;Cultivation</b>	<b>0</b>	<b>0</b>	<b>-</b>	<b>0</b>
<b>6</b>	<b>PublicUtilities(PublicLighting&amp;DJB)</b>	<b>56</b>	<b>241</b>	<b>-1</b>	<b>296</b>
<b>7</b>	<b>DelhiInternationalAirportLimited(DIAL)</b>	<b>15</b>	<b>89</b>	<b>0</b>	<b>105</b>
<b>8</b>	<b>RailwayTraction</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>

S.No.	Tariff Category	Fixed Charges Rs. Cr.	Energy Charges Rs. Cr.	TOD Impact Rs. Cr.	Total Revenue Rs. Cr.
9	DMRC supply at 66KV and 220KV	16	133	5	153
10	Temporary Supply	-	70	0	70
11	Advertisement and Hoardings	1	1	-	1
12	Charging Stations for E-Vehicle	-	8	-	8
12.1	Supply at LT	-	8		8
12.2	Supply at HT	-	-		-
13	Self-Consumption	-	-	-	-
14	<b>Total</b>	<b>1,484</b>	<b>5,919</b>	<b>21</b>	<b>7,424</b>

### Revenue (Gap)/ Surplus for FY 2020-21 at Existing Tariffs

5.13 The Revenue (Gap)/ Surplus for FY 2020-21 at Existing Tariffs is tabulated below:

*Table 5- 4 : Revenue (Gap)/ Surplus at Existing Tariff for FY 2020-21 (Rs. Crore)*

S. No	Particulars	FY 2020-21	Remarks/ Reference
A	Revenue Requirement for the year (excludes carrying cost)	9,660	
B	Revenue at existing tariff	6765	
C	<b>Revenue (Gap)/ Surplus for the year</b>	<b>-2,895</b>	<b>B-A</b>

### Pension Trust Surcharge

5.14 The Hon'ble Commission revised the pension trust surcharge from 3.7% in its Tariff Order dated 31.08.2017 to 3.8% vide Tariff Order dated 31.07.2019 and directed the Petitioner to deposit the actual amount collected through the said surcharge directly in to a specified bank account, on a monthly basis. The relevant extract of the directive issued in this regard is extracted below:

*“Tariff Schedule*

*7.The above tariff rates shall be subject to following additional surcharges to be applied only on the basic Fixed Charges and Energy Charges excluding all other charges e.g., LPSC, Arrears, Electricity Tax/Duty, PPAC, load violation surcharge, etc. for the consumers of BRPL, BYPL & TPDDL:*

- a) 8% towards recovery of accumulated deficit, and,*
- b) 3.80% towards recovery of Pension Trust Charges of erstwhile DVB Employees/Pensioners as recommended by GoNCTD.*

*Directives:*

*6.2 The Petitioner shall directly deposit the amount of pension trust surcharge collected from the consumer as per the tariff schedule in the following bank account, of Pension trust*

1	A/C No.	10021675545
2	MICR No.	110002103
3	Bank	State Bank of India
4	IFSC Code	SBIN0004281
5	Name	DVB-ETBF-2002
6	Branch	Rajghat Power House, New Delhi-110002

..”

- 5.15 The Petitioner has been complying with the above directive of the Hon’ble Commission.

**Tariff Proposal**

- 5.16 The revenue deficit projected by the Petitioner for FY 2020-21 at existing tariff is Rs. 2895 Crore.

- 5.17 The reasons for such deficit are listed as under:

- a. Adverse consumer mix which has resulted in a lower distribution margin at the hands of the licensee as compared to its peers;
- b. High power purchase and transmission cost due to recent CERC Tariff Orders;
- c. Tariffs being not reflective of their cost of supply, which make big

consumer susceptible to open access, adversely impacting remaining low end LT consumers;

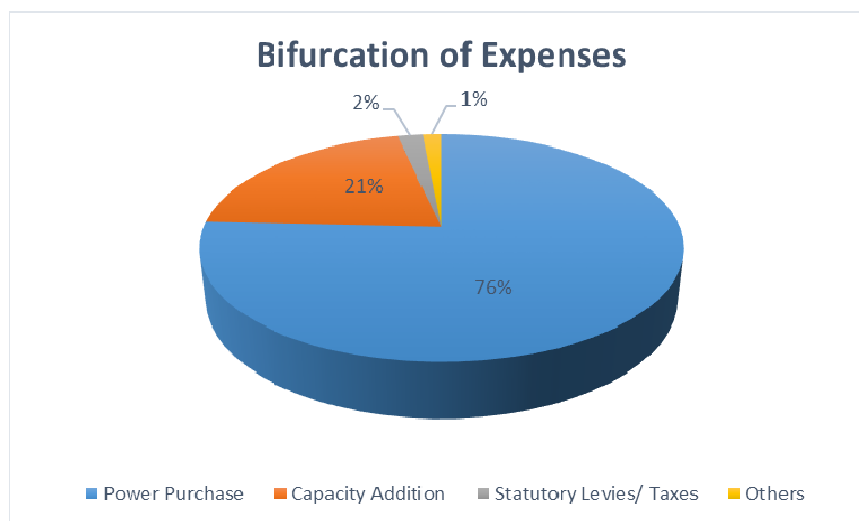
- 5.18 To address the revenue gap indicated above and to fully meet the tariff requirement of the Petitioner, the Hon'ble Commission is requested to determine a suitable cost reflective tariff.

**Table 5- 5 : Tariff Revision Proposed**

S. No	Particulars	Amount (Rs. Cr.)	Remarks/ Reference
A	Revenue (gap)/ surplus during FY 2020-21	-2,895	
B	Reason for revenue gap		
I	Power Purchase	7339	1. Impact of directions of MoP dated 15.05.2020 (Corrigendum dated 16.05.2020) to provide rebate on fixed charges not considered due to lack of confirmation from GENCOs. 2. Impact of recent CERC Orders (issued between December 2019 and May 2020) considered. 3. Variable Costs and Other Costs considered as per actuals of FY 2019-20. 4. Rebate and REC not considered.
li	O&M Expenses including Other Expenses and Statutory Levies	1393	1. Additional O&M expenses beyond the control of Petitioner considered. 2. COVID-19 expenses viz. Hand Sanitizers, Masks, Sanitization carried out in offices and buildings, Gloves, PPE kits, Face Shields etc considered. 3. Interest corresponding to advance payment to PP Generators not covered in normal WC considered.
lii	RoCE/Finance Charge/ Income Tax	746	
lv	Depreciation	340	
C	Earlier revenue gap proposed to be liquidated during FY 2020-21	Recovery of RA till FY 2018-19 and carrying	1. Without <i>prejudice</i> , existing 8% surcharge to be suitably increased for principal recovery of RA within stipulated time as per plan proposed before Hon'ble SC.

S. No	Particulars	Amount (Rs. Cr.)	Remarks/ Reference
		cost estimated to be incurred during FY 2020-21	2. Carrying cost ought to be allowed as a separate surcharge on revenue instead of allowing in tariff as per requirements of Financial Institutions. 3. Trajectory to recover the huge accumulated regulatory gap upto FY 2018-19.
D	Tariff Hike Proposed (%)	Suitable cost reflective tariff. Suitable surcharge for recovery of entire RA along with carrying cost as per the provisions of the National Tariff Policy.	

5.19 The below pie-chart clearly shows that the revenue gap is primarily on account of Power Purchase Cost which is not within the control of the Licensee:



## Cost of Service Model

5.20 As regards ratio of allocation of ARR into Wheeling and Retail Supply, Regulation 32 of DERC Business Plan Regulations, 2019 states as under:

***“32.Ratio of Allocation of ARR into Wheeling & Retail Supply***

*The ratio of allocation of ARR into Wheeling & Retail Supply Business in terms of the Regulation 4(9) (e) of the DERC (Terms and Conditions for determination of Tariff) Regulations, 2017 shall be as follows:*

**Table 17: Retail Business**



<b>Particulars</b>	<b>BRPL</b>	<b>TPDDL</b>	<b>BYPL</b>
Cost of Power Purchase	100%	100%	100%
Inter-State Transmission Charges	100%	100%	100%
Intra-State Transmission Charges	100%	100%	100%
SLDC fees and charges	100%	100%	100%
Operation & Maintenance Costs	40%	38%	38%
Depreciation (including AAD)	21%	23%	19%
Return on Capital Employed	26%	28%	28%
Income Tax	26%	28%	28%
Non Tariff Income	85%	60%	85%

**Table 18: Wheeling Business**

<b>Particulars</b>	<b>BRPL</b>	<b>TPDDL</b>	<b>BYPL</b>
Operation & Maintenance Costs	60%	62%	62%
Depreciation (including AAD)	79%	77%	81%
Return on Capital Employed	74%	72%	72%
Income Tax	74%	72%	72%
Non Tariff Income	15%	40%	15%

....”

- 5.21 Employing the aforesaid ratios, the Petitioner has bifurcated the ARR into Retail and Wheeling Business as per the Table given below:

**Table 5- 6 : Allocation of ARR into Retail and Wheeling Business**

<b>S. No</b>	<b>Particulars</b>	<b>Retail</b>	<b>Wheeling</b>	<b>Total</b>
1	Cost of Power Purchase	7339	0	7339
2	Operation & Maintenance Costs	440	660	1099
3	Depreciation (including AAD)	71	269	340
4	Return on Capital Employed	194	552	746
5	Additional expenses / other expenses	117	176	293
6	Non -Tariff Income	134	24	158
7	<b>Total</b>	<b>8027</b>	<b>1633</b>	<b>9660</b>

- 5.22 Accordingly, the Petitioner requests the Hon’ble Commission to consider the aforesaid bifurcation.

## **Proposal on Tariff Structure**

### **Time bound recovery of Regulatory Assets/ Revenue Gap:**

- 5.23 The Hon’ble Commission in Tariff Order dated July 31, 2019 has rationalized the Tariff. While doing so, the Hon’ble Commission has assumed a sanctioned load of 9257 MW for all consumers during FY 2019-20.

- 5.24 As compared to the projected sanctioned load, the Petitioner estimates the sanctioned load of 9676 MW for FY 2020-21 respectively. The Petitioner serves the largest percentage of Domestic consumers in Delhi. The Petitioner observed almost 62% of the total sales during FY 2020-21 on account of domestic consumers.
- 5.25 The 8% Additional Surcharge towards recovery of past accumulated deficit is not sufficient to recover the Regulatory asset in a time bound manner, where the annual revenue realization of the petitioner is much less in comparison to the accumulated gap.
- 5.26 The creation and maintenance of the Regulatory asset for such a long period is against the principles of natural justice to both the petitioner and its consumers. Petitioner is affected due to the reason that the financial health of the petitioner is adversely affected and the banks are reluctant to disburse any further loans to the petitioner. The consumer of the petitioner is adversely affected due to the fact that they would have to bear the impact of carrying cost on annual basis in the tariff.
- 5.27 The Hon'ble Commission is requested to kindly review the present 8% surcharge towards accumulated deficit and approve a revised Surcharge to ensure that the Regulatory asset of the petitioner along with the impact of past claims be recovered in a time bound manner along with the carrying cost.

**Cross subsidy as per Tariff Policy:**

- 5.28 As per Tariff Policy 2016, the appropriate Commission would notify a roadmap such that tariffs are brought within  $\pm 20\%$  of the Average cost of Supply. Clause 8.3 of Tariff policy 2016 is reproduced below:

*"2. For achieving the objective that the tariff progressively reflects the cost of supply of electricity, the Appropriate Commission would notify a roadmap such that tariffs are brought within  $\pm 20\%$  of the average cost of supply. The road map would also have intermediate milestones, based on the approach of a gradual reduction in cross subsidy."*

- 5.29 The Petitioner would like to bring to the kind notice of the Hon'ble Commission that the cross subsidy in the approved tariff is more than norms as mentioned in the Tariff Policy 2016. A comparative table of cross subsidy approved by the Hon'ble Commission in its tariff order from FY 2017-18 to FY 2019-20 is tabulated below:

*Table 5- 7 : Comparison of Cross subsidy approved in respective tariff orders*

S.No	Category	Approved in TO Dated 31.07.2017	Approved in TO Dated 28.03.2018	Approved in TO Dated 31.07.2019	Projected on approved tariff of FY 2019-20
		FY 2017-18	FY 2018-19	FY 2019-20	FY 2020-21
1	Domestic	-19%	-20%	-26%	-38%
2	Non Domestic	39%	44%	53%	40%
3	Industrial	25%	25%	34%	25%
4	Agriculture	-59%	-57%	-55%	-54%
5	Public Lighting	-1%	-12%	0.3%	-7%
6	DMRC	-13%	-20%		
7	DJB	23%	6%		
8	DIAL	12%	-1%	10%	8%
9	E Vehicle			-33%	-43%

5.30 The issue related to cross subsidy and tariff simplification has also been addressed in agenda item no 4(a) 60th Meeting of Forum of Regulator Dated 23rd June 2017 which mentions that Domestic category may have within itself three subcategories i.e. Cross subsidizing, Cross Subsidized, and cross subsidy neutral.

5.31 It is pertinent to mention that as per cross subsidy as projected by the Petitioner for FY 2020-21 on the basis of approved tariff schedule of FY 2019-20 within Domestic category is not in line with the 60th meeting of Forum of Regulator. A comparison of Cross Subsidizing, Cross Subsidized and Cross Subsidy Neutral within Domestic category is tabulated below along with the percentage consumption.

*Table 5- 8 : Comparison of Cross subsidy with Domestic Category*

S.No	Category	% Units Billed	ACoS	ABR	Cross subsidy	Remarks
1	Domestic upto 2 KW	51.93%	7.89	3.75	-53%	95.12% Domestic consumption is Cross Subsidized
2	Domestic 2 to 5 KW	21.04%	7.89	4.71	-40%	
3	Domestic 5 to 15 KW	22.14%	7.89	6.63	-16%	

S.No	Category	% Units Billed	ACoS	ABR	Cross subsidy	Remarks
4	Domestic 15 to 25 KW	2.31%	7.89	9.01	14%	4.88% Domestic consumption is Cross Subsidizing
5	Domestic Above 25 KW	2.57%	7.89	9.91	26%	

5.32 In view of the above, Hon'ble Commission is requested to kindly address the issue of cross subsidization among all categories by restructuring the existing tariff structure. It is also suggested that common tariff may be adopted across all categories of consumer matching with average cost of supply of the Petitioner.

### Tariff Simplification:

5.33 The Petitioner proposes to simplify the Tariff Slabs and Rationalise the Tariffs for different consumer categories as per the National Tariff Policy, 2016. The relevant extracts of the Policy are reproduced below:

#### ***"8.3 Tariff design: Linkage of tariffs to cost of service***

*It has been widely recognised that rational and economic pricing of electricity can be one of the major tools for energyconservation and sustainable use of ground water resources.*

*In terms of the Section 61(g) of the Act, the Appropriate Commission shall be guided by the objective that the tariffprogressively reflects the efficient and prudent cost of supply of electricity.*

*The State Governments can give subsidy to the extent they consider appropriate as per the provisions of section 65 ofthe Act. Direct subsidy is a better way to support the poorer categories of consumers than the mechanism of cross-subsidizingthe tariff across the board. Subsidies should be targeted effectively and in transparent manner. As asubstitute of cross subsidies, the State Government has the option of raising resources through mechanism of electricityduty and giving direct subsidies to only needy consumers. This is a better way of targeting subsidies effectively.*

*Accordingly, the following principles would be adopted:*

*1. Consumers below poverty line who consume below a specified level, as prescribed in the NationalElectricity Policy may receive a special support through cross subsidy. Tariffs for such designated group ofconsumers will be at least 50% of the average cost of supply.*

*2. For achieving the objective that the tariff progressively reflects the cost of supply of electricity, the Appropriate Commission would notify a roadmap such that tariffs are brought within  $\pm 20\%$  of the average cost of supply. The road map would also have intermediate milestones, based on the approach of a gradual reduction in cross subsidy."*

5.34 In addition, NITI Aayog also issued a Diagnostic Study of the Power Distribution Sector in April 2019, wherein the issue of Complex Retail Tariff Structure has issued way forward as below:

*"Over time, because of considerable changes in the consumer mix, consumption pattern, and demand-supply situation, there has been substantial addition in the number of categories, sub-categories and slabs. While the introduction of these categories served the intended purpose initially, it has now become difficult for the regulatory commissions to do away with any of them, owing to socio-political reasons. In fact, the Economic Survey for fiscal 2016 noted the following key points regarding electricity tariffs:*

- Complexity of tariff schedules prevents economic actors from responding sufficiently to price signals*
- Price and non-price barriers come in the way of single-nationwide electricity price through OA*
- Existence of separate and multiple tariff categories, sub-categories and slabs create a complexity, which prevents consumers from fully responding to tariffs because of the high cost of processing the price information*

*Currently, the tariffs framed by the SERC for retail consumers are complex with many sub-categories and conditions. This leads to confusion not just at the consumer level but even at the discom level.*

*It is, therefore, recommended that the tariff structures should be reviewed. While carrying out simplification of tariff categories, revenue neutrality needs to be ensured. We may merge/eliminate existing tariff categories, based on:*

- End-use*
- Energy consumption*
- Socio-economic profile/affordability*
- Social factors (rural and urban area differentiation)*

- Consumption pattern/load factor
- Voltage
- Efficient energy use

*Based on the above exercise, standard tariff categories need to be defined across all states. Also, guidelines need to be laid out for determination of sub-categories and prescribing limit on the number of slabs under the standard tariff categories. Any tariff standardisation exercise at the national level will require a comprehensive assessment of the impact on revenue of the utilities. The tariff design should reflect the prudent and efficient cost of supply to the consumers while maintaining revenue neutrality. The new tariff structure should adequately recover fixed costs of the distribution utility through demand charges and variable costs through energy charge. Socio-economic development of the utility should be promoted by providing attractive and affordable tariffs to households, agricultural and industrial consumers. “*

- 5.35 Some of the Commissions have started moving from the complicated Tariff Structures to a more simple and compact tariff structures. Commissions like Jharkhand State Electricity Regulatory Commission and Uttarakhand Electricity Regulatory Commission have made efforts towards reduction in slabs as well as clubbing similar categories in progressive manner so that it does not adversely affect the consumers.
- 5.36 Jharkhand State Electricity Commission in its Tariff Orders for FY 2018-19 and FY 2019-20 has completely done away with slabs in any Tariff Categories, making the Tariff Structure simple and have rationalised the Tariff Structure to better meet the Cost of Supply. As in FY 2019-20 all the consumer categories are within +/-10% of the average cost of supply except Irrigation and Agriculture (~19%). In FY 2018-19, the JSERC took the bold step for rationalising the tariff categories/sub-categories and slabs to around 16 from around existing 28 categories/sub-categories/slabs.
- 5.37 Furthermore, JSERC has merged all HT consumers except HT Domestic consumers into a single category and has implemented kVAh based Tariff for all HT consumers and LT Industrial consumers for FY 2019-20. JSERC has also restructured all consumers having contracted demand less than 5 kW as domestic consumers.
- 5.38 Similar developments have happened in Uttarakhand as well. The Total No. of Consumer Categories have been brought to 7, viz., Domestic, Non-Domestic,

Govt. Public Utilities (comprising Street Lights, Public Water Works, etc) Private Tubewells, Industries, Mixed Load and Railway Traction.

- 5.39 UERC has also set the tariff for all the consumer categories within +/-20% of the average cost of supply except PTW consumers. UERC has also implemented kVAh based Tariffs for all consumers having a contracted capacity above 25 kW.
- 5.40 In the light of the above submissions, the Petitioner requests the Hon'ble Commission to explore the possibility of further simplifying the tariff structure of the Petitioner without adversely affecting the interests of the consumers.

**GoNCTD Subsidy amount to be passed on the basis of Direct Benefit Transfer (DBT):**

- 5.41 The GoNCTD subsidy is given to the Domestic consumers including CGHS, Lawyer's Chambers and 1984 Sikh Riots Victims, Agricultural consumers, etc. Currently, the Subsidy amount is been discounted in the electricity bills of the consumers. In this regard, Hon'ble Commission is requested to kindly allow the payment of subsidy amount through direct benefit transfer as done in several schemes of Government of India such as payment of subsidy for LPG Gas cylinder. In this way consumer, would feel a sense of responsibility in usage of electricity as consumer have to pay the full electricity bills initially and the subsidy amount to such consumer would be passed through direct benefit transfer.

**Exclusion of dishonest consumers for GoNCTD Subsidy:**

- 5.42 Subsidy should be given to the honest consumers so that the dishonest consumers are encouraged in making timely payment of electricity bills and/ or avoid in indulging in activities like theft & unauthorized use of electricity etc. Hence, Petitioner requests the Hon'ble Commission to kindly allow for payment of subsidy only to those consumers whose electricity bills are clear upto the previous billing cycle. Further, it is also requested to approve, a subsidy lock on those consumers where a case of theft/ unauthorized use of electricity has been booked. The subsidy lock would be removed after one year of clearance of the full enforcement dues.

**Time of day tariff:**

- 5.43 The Hon'ble Commission in the tariff order dated 31<sup>st</sup> July 2019 had approved Time of Day tariff as per the following:-

*"3. Time of Day (ToD) Tariff*

...



e. ToD tariff shall be applicable on all consumers (other than Domestic) whose sanctioned load/MDI (whichever is higher) is 10kW/11kVA and above.

f. Optional for all other three phase (3Ø) connections including Domestic connections. If the consumer who has opted for ToD, the charges for up-gradation of meters, if any, shall be borne by respective consumers.

g. The Commission has decided to retain the Rebate during the Off Peak hours and Peak hours Surcharge at 20%. Optional ToD Consumers will have the option to move back to Non-ToD regime only once within one Financial Year. For other than Peak and Off-Peak hours normal Energy Charges shall be applicable.

h. The Commission has retained the time slots for Peak and Off-Peak hours as follows:

Months	Peak Hours	Surcharge on energy charges	Off Peak Hours	Rebate on Energy charges
May to September	1400-1700 hrs and 2200 – 0100 hrs	20%	0400 – 1000 hrs	20%

5.44 The Petitioner requests the Hon'ble Commission to kindly retain the TOD Tariff as approved for FY 2019-20 while approving the tariff for FY 2020-21.

#### **Waiving of the processing fee on account of digital payment:**

5.45 The Digital India programme is the flagship program of Government of India with a vision to transform India into digitally empowered society and knowledge economy. Petitioner had also taken several initiatives to become digital by all means and contribute towards the national goal. One of the major key factors for contributing towards the Digital India Program is to adopt and promote the digital payment modes. Digital payment modes not only gives the convenience in bill payment 24x7, from the comfort of home or on the go, but it also results in monetary savings to consumers in their travelling cost and also saves the precious time of the consumers. Many of the petitioner's associated business partners like paytm, mobikwik, phonepay etc keep on sponsoring incentive schemes for promotion of digital payments thorough their platform. The Hon'ble Commission had also restricted the cash payment of electricity bills to Rs 4,000/- for promoting digital payment.



- 5.46 In view of promotion of Digital payments, Petitioner request the Hon'ble Commission to kindly waive of the processing charges charged by the Bank/ Gateway and allow the same as a pass through in the ARR of the Petitioner.

**Levy of Disconnection penalty on account of non-payment of dues by defaulting consumers:**

- 5.47 The Hon'ble Commission had empowered the DISCOMs under Regulation 50 of the DERC (Supply Code & Performance Standards) Regulations, 2017 to disconnect the supply in case of default in payment by the consumer. It is submitted that considerable manpower and cost is being deployed by the Petitioner to disconnect the supply of the defaulting consumers. There are instances that some consumers are continuous defaulters and licensee has to disconnect such consumers more than one times in a year.
- 5.48 The Hon'ble Commission is requested to kindly approve the disconnection penalty of 2% of defaulted amount to be recovered from the defaulting consumers, so that the consumers may also feel the sense of responsibility in making timely payment of their electricity dues so that disconnection can be avoided.

**Tariff of Electric Vehicle:**

- 5.49 Currently the Tariff of electric vehicle is much lower than the average cost of supply and other tariff categories are cross subsidizing this lower tariff of electric vehicle. It is requested that the tariff for charging stations for electric vehicle may be approved equivalent to average cost of supply of the Petitioner. For any new category, the cross subsidy should not be provided and its tariff should be fixed equivalent to Average Cost of Supply as per the provisions of National Tariff Policy. Further, Time of day tariff is also required to be approved on the charging station for Electric vehicle category as their business model is suitable for shifting the electric load in the off peak time slots. This would help the DISCOM's Load curve. It is also proposed to approve dynamic pricing in the tariff for maintaining the grid security in low/ high demand time.

**Expected Revenue with tariff revision proposed:**

- 5.50 The expected revenue from existing tariff and revised revenue as per proposal is tabulated below:

*Table 5- 9 : Expected revenue category-wise (Rs./ Unit)*

S.No.	Tariff Category	Fixed Charges	Energy Charges	TOD Impact	Total Revenue	Hike in Tariff	Revised Rev Proposed
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# BSES RAJDHANI POWER LIMITED

		Rs. Cr.	Rs. Cr.	Rs. Cr.	Rs. Cr.	%	Rs. Cr.
<b>1</b>	<b>Domestic</b>	<b>496</b>	<b>3,275</b>	<b>-</b>	<b>3,771</b>		
1.1	<b>Domestic</b>	<b>473</b>	<b>3,161</b>	<b>-</b>	<b>3,634</b>		
1.1.1	<b>Upto 2 KW Connected Load</b>	<b>60</b>	<b>1,386</b>	<b>-</b>	<b>1,446</b>		
	0-200 Units	34	378		413		
	201-400 Units	18	527		545		
	401-800 Units	7	380		387		
	801-1200 Units	1	71		72		
	Above 1200 Units	0	29		29		
1.1.2	<b>&gt; 2 KW to ≤ 5 KW Connected Load</b>	<b>85</b>	<b>655</b>	<b>-</b>	<b>739</b>		
	0-200 Units	23	47		70		
	201-400 Units	30	166		196		
	401-800 Units	24	262		286		
	801-1200 Units	6	126		132		
	Above 1200 Units	1	54		55		
1.1.3	<b>&gt; 5 KW to ≤ 15 KW Connected Load</b>	<b>235</b>	<b>859</b>	<b>-</b>	<b>1,094</b>		
	0-200 Units	50	19		70		
	201-400 Units	49	80		129		
	401-800 Units	68	232		300		
	801-1200 Units	35	203		238		
	Above 1200 Units	33	325		358		
1.1.4	<b>&gt; 15 KW to ≤ 25 KW Connected Load</b>	<b>44</b>	<b>114</b>	<b>-</b>	<b>158</b>		
	0-200 Units	4	0		4		
	201-400 Units	3	1		4		
	401-800 Units	6	5		12		
	801-1200 Units	7	11		17		
	Above 1200 Units	24	97		122		
1.1.5	<b>&gt; 25 KW Connected Load</b>	<b>50</b>	<b>146</b>		<b>196</b>		
	0-200 Units	2	0		2		
	201-400 Units	1	0		1		
	401-800 Units	2	1		3		
	801-1200 Units	2	2		4		
	Above 1200 Units	42	143		186		
1.2	<b>Single Delivery Point on 11 KV for GHS</b>	<b>20</b>	<b>92</b>		<b>112</b>		
1.3	<b>Hospital (11KV)</b>	<b>3</b>	<b>14</b>		<b>17</b>		
1.4	<b>Worship (11KV)</b>	<b>0</b>	<b>2</b>		<b>2</b>		
1.5	<b>DVB Staff</b>	<b>0</b>	<b>6</b>		<b>7</b>		
<b>2</b>	<b>Non Domestic</b>	<b>802</b>	<b>1,784</b>	<b>14</b>	<b>2,600</b>		
2.1	Upto 3kVA	112	111	1	224		
2.2	Above 3kVA	690	1,673	13	2,375		
<b>3</b>	<b>Industrial</b>	<b>94</b>	<b>315</b>	<b>3</b>	<b>412</b>		

To meet the above revenue gap, the retail tariff ought to be determined in such a manner that, there ought not to be any revenue gap during FY 2020-21.

S.No.	Tariff Category	Fixed Charges	Energy Charges	TOD Impact	Total Revenue	Hike in Tariff	Revised Rev Proposed
		Rs. Cr.	Rs. Cr.	Rs. Cr.	Rs. Cr.	%	Rs. Cr.
4	Agriculture	4	3	-	8		
5	Mushroom Cultivation	0	0	-	0		
6	Public Utilities (Public Lighting & DJB)	56	241	-1	296		
7	Delhi International Airport Limited (DIAL)	15	89	0	105		
8	Railway Traction	-	-	-	-		
9	DMRC supply at 66 KV and 220KV	16	133	5	153		
10	Temporary Supply	-	70	0	70		
11	Advertisement and Hoardings	1	1	-	1		
12	Charging Stations for E-Vehicle	-	8	-	8		
12.1	Supply at LT	-	8		8		
12.2	Supply at HT	-	-		-		
13	Self-Consumption	-	-	-	-		
14	Total	1,484	5,919	21	7,424		

- 4.1 The revenue gap at current tariff is Rs. 2895 Crore. To meet the above revenue gap, the retail tariff ought to be determined in such a manner that after considering a collection efficiency of 91.12%, there ought not to be any revenue gap during FY 2020-21.

#### **Ratio of Average Billing Rate to Average Cost of Supply:**

- 5.51 The ratio of Average Billing Rate (ABR) to Average Cost of Supply (ACoS) at existing tariff and proposed tariff is tabulated below:

*Table 5- 10 : Ratio of ABR to ACoS for FY 2020-21*

S.No	CATEGORY	ACoS	ABR at current tariff	Hike in Tariff	ABR as per revised tariff	Ratio of ABR at revised tariff to ACoS	Revised Revenue Proposed (Rs. Cr.)
1	DOMESTIC	8.64	5.35	To meet the revenue gap, the retail tariff ought to be determined in such a manner that after considering a suitable collection efficiency, there ought not to be any revenue gap during FY 2019-20.		To be determined by Hon'ble Commission	
2	NON-DOMESTIC	8.64	14.01				
3	INDUSTRIAL	8.64	11.69				
4	AGRICULTURE	8.64	4.02				
5	MUSHROOM CULTIVATION	8.64	9.93				
6	PUBLIC UTILITIES	8.64	8.67				
7	DIAL	8.64	10.29				
8	ADVERTISEMENTS AND HOARDINGS	8.64	16.53				
9	TEMPORARY	8.64	12.38				
10	E-VEHICLE	8.64	5.03				
<b>11</b>	<b>Grand Total</b>	<b>8.64</b>	<b>7.43</b>				

### Tariff Schedule Proposed:

5.52 The Tariff Schedule proposed during FY 2020-21 is tabulated below:

*Table 5- 11 : Tariff Schedule proposed for FY 2020-21*

S. No	Particulars	UoM	Amount	Reference
1	ARR estimated for FY 2020-21	Rs. Cr.	9660	Table 4.31
2	Revenue realization estimated for FY 2020-21	Rs. Cr.	6765	Table 4.32
3	Revenue actually required for FY 2020-21	Rs. Cr.	9660	3=1
4	Collection Efficiency	%	91.12%	Para-4.44
5	Revenue Billed required to be allowed for FY 2020-21 based on projections	Rs. Cr.	10601	5=3/ (1-4)

5.53 In view of the above the Petitioner proposes the Hon'ble Commission to determine a suitable cost reflective tariff, so as to recover the projected Revenue Gap.



**BEFORE THE DELHI ELECTRICITY REGULATORY COMMISSION  
C BLOCK, SHIVALIK, MALVIYA NAGAR, NEW DELHI**

**PETITION NO. 01 OF 2020**

**IN THE MATTER OF:-**

**BSES Rajdhani Power Limited**

BSES Bhawan, Nehru Place

New Delhi-110 019

..... **PETITIONER**

**AND**

**IN THE MATTER OF:-** Annual Tariff Petition and Tariff for FY 2020-21 under Section 62 of the Electricity Act, 2003 read with Regulation 11 & 12 and other relevant provisions under DERC Tariff Regulations, 2017 and the Delhi Electricity Regulatory Commission Business Plan Regulations, 2019 (hereinafter referred to as "**Business Plan Regulations, 2019**") and also under Sections 11 and 28 of Delhi Electricity Reforms Act 2000 to the extent applicable, the Delhi Electricity Regulatory Commission (Conduct of Business) Regulations, 2001 and Condition 24 of the License for Distribution and Retail Supply of Electricity issued by the Hon'ble Commission.

**AND**

**IN THE MATTER OF:-** The Hon'ble Commission's letters dated 20.05.2020 and 01.06.2020 seeking revision/amendment in the ARR for FY 2020-2021.

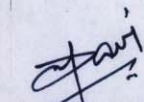
**AFFIDAVIT VERIFYING THE PETITION:**

I, Ravi Shandilya, S/o. Shri S.P. Singh, aged about 35 years, having my office at BSES Bhawan, Nehru Place, New Delhi - 110019, do hereby solemnly affirm and state as follows.





1. I am working with BSES Rajdhani Power Limited, the Petitioner herein, as Senior Manager (Regulatory Affairs) and am duly authorized by the said Petitioner to make the present affidavit.
2. I say that on behalf of BSES Rajdhani Power Limited, I am filing the present revised/amended ARR Petition for FY 2020-21.
3. I further say that the statements made and data presented in the present revised ARR Petition are to the best of my knowledge, derived from the records of the Company maintained in the ordinary course and based on estimations arising from data and or records of the Company. Further, to my knowledge and belief, no material information has been concealed in the aforesaid Petition.



**DEPONENT**

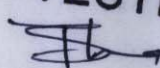
Ravi Shandilya  
Senior Manager (Regulatory Affairs)  
Authorized Signatory  
BSES Rajdhani Power Limited

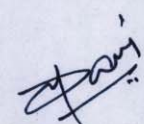
**VERIFICATION:**

I, Ravi Shandilya, the Petitioner hereby solemnly affirms that the contents of above affidavit are true to the best of my knowledge, no part of it is false and nothing material has been concealed there from.

Verified by me on this 04 day of June, 2020 at New Delhi



**ATTESTED**  
  
**NOTARY PUBLIC, DELHI**  
- 4 JUN 2020



**DEPONENT**

Ravi Shandilya  
Senior Manager (Regulatory Affairs)  
Authorized Signatory  
BSES Rajdhani Power Limited

- 4 JUN 2020

# FORMATS



## ARR FORMATS

### BSES RAJDHANI POWER LIMITED

#### INDEX OF FORMATS

1	S1	Profit & Loss Account
2	S3	Annual Revenue Requirement
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4	F2	Form 2.1a
5	F4	Income from investments and Non-Tariff Income
6	F13	Contribution Grants & subsidies towards Capital assets
7	F1a	Energy Balance : Energy Input and Cost of Pool Power
8	F17	Allocation Statement - Wheeling Business
9	F18	Allocation Statement - Retail Supply Business
10	F22	Projection of Sales, Customers & Connected load for metered consumers
11	F23	Revenue from Proposed Tariff & Charges





BSES RAJDHANI POWER LIMITED		Form No.- S1
Profit & Loss Account		
Sr. No.	Particulars	in Rs Cr. FY 2020-21 Projection
<b>A</b>	<b>Revenue</b>	
1	Revenue from sale of power	6,765.41
2	Non-tariff income	157.60
3	Other Revenue/ subsidies /incentives	
4	Income from Open Access	
5	Less: Carrying cost	
	<b>Total Revenue or Income</b>	<b>6,923.01</b>
<b>B</b>	<b>Expenditure</b>	
1	Purchase of Power from Long term Sources net off rebate	6,252.24
2	Purchase of Power from Other than Long term Sources	
3	Transmission Charges	
	(a) Inter State	1,086.73
	(b) Intra State	
4	Other Transmission Charges	
5	Load Despatch Charges	
6	Less: Revenue from sale of surplus power	
7	Less: Additional UI Charges	
8	Operations and Maintenance Expenditure	1,099.40
	(a) Repairs and Maintenance	
	(b) Employee costs (Excluding loans and advances to Staff)	
	(c) Administration and General expenses	
	(d) Other borrowing costs	
9	Addnl. O&M Expenses	293.38
8	Net prior period credit/(charges)	
9	Other Debits, Write-offs	
10	Extraordinary items	
11	Less: Expenses Capitalized (A&G/Employee Expenses)	
<b>C</b>	<b>Profit before depreciation, interest and taxes</b>	<b>8,731.75</b>
<b>D</b>	<b>Depreciation</b>	<b>340.13</b>
<b>E</b>	<b>Provisions</b>	
<b>F</b>	<b>PBIT</b>	<b>9,071.88</b>
1	Interest & Finance Charges	326.51
2	Return on Equity	346.08
3	Less: Interest Capitalized	
<b>G</b>	<b>Total Interest and Finance Charges</b>	<b>673</b>
<b>H</b>	<b>TOTAL EXPENDITURE</b>	<b>9,744</b>
<b>I</b>	<b>Profit/Loss before Tax</b>	<b>- 2,821</b>
<b>J</b>	<b>Income Tax</b>	<b>73</b>
<b>K</b>	<b>Other Comprehensive Income</b>	
<b>L</b>	<b>Profit/Loss after Tax (Revenue Gap in case of Actuals)</b>	<b>- 2,895</b>

\*Claim as per DERC Traiff Regulations, 2017

*[Signature]*



BSES RAJDHANI POWER LIMITED Annual Revenue Requirement		Form No.- S3
Sr. No.	Particulars	in Rs Cr. FY 2020-21 Projection
1	Power Purchase (MU)	12,163
2	Sale of Power (MU)	11178
3	Loss %	8.10%
3.1	Distribution	985
3.2	Intra State	427
3.3	Inter State	
1	Receipts	
a	Revenue from tariffs	
	i) Fixed Charges	6765
	ii) Energy Charges	
	iii) PPAC	
	iv) Surcharge for Regulatory Asset (8%)	
	v) Surcharge for Pension Trust (3.8%)	
	vi) Electricity Duty	
	vii) Any Other Receipt	
b	Revenue subsidy from Govt.	
c	Less: Recovery on account of carrying cost	
	Less: Incentives/ Dis-incentive as per Regulation 157 of MYT Regulations, 2017	
d	Regulations, 2017	
i	Overachievement of T&D loss targets	
ii	Overachievement of CE targets	
iii	Sale Rate	
e	Less: Gain on a/c of Regulated Power	
f	Add: Income from Open Access	
	Total	6765
2	Expenditure	7339
a	Purchase of Power from Long Term Sources	6,181
b	Purchase of Power from Other than Long Term Sources	240
c	Transmission Charges	
	i) Intra State	1087
	ii) Inter State	
d	Other Transmission Charges	
e	Load Despatch Charges	
f	Less: Revenue from sale of surplus power	169
g	Less: Additional UI Charges	
	Less: Rebate	0
h	O&M Expenses	1099
i	v) Additional O&M Expenses	293
j	Depreciation	340
k	Interest & Finance Charges	327
l	ROE	346
m	Less: Interest capitalised	
n	Less: Finance charges capitalised	
o	Less: O&M capitalised	
p	Extraordinary Items	
q	Other (Misc.)-net prior period credit/ (charges)	
	Total	9744
3	Return as approved/ allowed by Commission	
4	Income-Tax	73
5	Less: Carrying Cost	
6	Other Income	158
7	Annual Revenue Requirement (2)+(3)+(4)+(5)-(6)	9660
8	Surplus(+) / Shortfall(-) : (1)-(7) before tariff revision	-2895
9	Tariff Revision Impact	Suitable Tariff Hike to be provided by the Hon'ble Commission
10	Surplus(+) / Shortfall(-) : (6)-(7) after tariff revision#	0



BSES RAJDHANI POWER LTD.																
Power Purchase Statement for FY 2020-21																
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)=(3)+(4)+(5)+(6)+(7)+(8)+(9)	((11)=(10)/(2)	(12)	(13)	(14)=(2)-(12)	(15)=(10)+(13)	Form No: F1 (16)=(15)/(14)
Sl. No.	Station Name/ Agency	MUs Purchased /sold	Fixed Cost (in Rs./Cr.)	Variable Cost (in Rs./Cr.)	Other Charges (in Rs./Cr.)	Arrears (in Rs./Cr.)	Interest on Arrears as approved by CERC, if any (in Rs./Cr.)	Late Payment Surcharge, if any (in Rs./Cr.)	Incentive/ adjustment, if any	Total Charges (in Rs./Cr.)	Per Unit Cost (Rs./Kwh)	Transmissio n Losses (MUs)	Transmission /open Access Charges (in Rs./Cr.)	MUs at Discoms Periphery	Total charges including transmission charges (in Rs./Cr.)	Per Unit cost at Discom Periphery (Rs./Kwh)
	<b>Power Purchase Statement</b>															
1	Anta Gas Power Project	28.8	10.1	10.4	0.2					20.6	7.15					
2	Auraiya Gas Power Station	32.2	14.7	11.7	0.7					27.2	8.45					
3	Badarpur Thermal Power Station	-	-	-	-					-	-					
4	Dadri Gas Power Station	77.4	16.9	26.5	3.3					46.7	6.04					
5	Feroze Gandhi Unchahar TPS 1	49.2	7.1	17.6	0.2					24.8	5.03					
6	Feroze Gandhi Unchahar TPS 2	128.7	12.6	46.3	0.2					59.2	4.60					
7	Feroze Gandhi Unchahar TPS 3	79.4	10.8	28.3	0.2					39.3	4.95					
8	Farakka STPS	59.3	5.6	15.5	1.3					22.4	3.78					
9	Kahalgaoon Thermal Power Station 1	143.7	16.1	32.5	(0.1)					48.5	3.37					
10	National Capital Thermal Power Station	1,511.7	376.0	644.0	11.9					1,031.9	6.83					
11	Rihand Thermal Power Station 1	471.1	40.6	65.6	(0.05)					106.2	2.25					
12	Rihand Thermal Power Station 2	384.2	27.5	53.7	(0.01)					81.2	2.11					
13	Singrauli STPS	208.4	13.4	29.5	(0.04)					42.9	2.06					
14	Kahalgaoon Thermal Power Station 2	443.4	53.0	95.3	(0.2)					148.0	3.34					
15	Dadri TPS-II	2,643.7	555.2	1,015.3	10.3					1,580.8	5.98					
16	Rihand Thermal Power Station 3	542.7	79.7	74.9	(0.1)					154.5	2.85					
17	Bairasiul	-	3.3	-	0.005					3.3	-					
18	Salal	294.0	14.3	18.1	27.0					59.4	2.02					
19	Chamera I	83.8	5.7	9.6	(0.02)					15.3	1.82					
20	Tanakpur	24.9	3.6	4.0	0.003					7.6	3.06					
21	Uri	138.8	9.0	11.4	4.0					24.4	1.76					
22	Dhauliganga	57.9	7.0	7.0	0.01					14.0	2.42					
23	Chamera - II	86.4	7.7	8.7	0.01					16.4	1.89					
24	Dulhasti	127.0	25.7	33.5	3.5					62.7	4.94					
25	Chamera - III	56.3	10.5	13.6	0.4					24.5	4.35					
26	SEWA-II	30.9	7.1	6.1	0.01					13.2	4.27					
27	Uri II	77.6	12.2	14.0	4.3					30.4	3.93					
28	Parbati-III	36.5	14.5	5.6	0.02					20.2	5.52					
29	Nuclear Power Corp. of India Ltd. Narora	222.8	-	66.2	5.9					72.1	3.24					
30	Nuclear Power Corp. of India Ltd. Kota UNIT - 5&6 RAPP	167.7	-	65.9	2.4					68.2	4.07					
31	Nathpa Jhakri	287.0	29.0	32.7	0.04					61.7	2.15					
32	Tehri	134.9	28.2	34.1	-					62.3	4.62					
33	Koteswar	82.7	15.9	18.8	-					34.7	4.19					
34	Tala	33.0	-	7.1	-					7.1	2.16					
35	Tuticorin	145.5	-	51.4	-					51.4	3.53					
36	Mejia Unit 6	206.6	40.7	64.3	0.03					105.1	5.09					
37	CTPS Units 7 & 8	764.5	140.1	185.1	0.08					325.3	4.26					
38	Indraprastha Power Generation Co.Ltd. RPH	-	-	-	-					-	-					
39	Indraprastha Power Generation Co.Ltd. GT	354.8	89.7	173.2	-					263.0	7.41					
40	Pragati Power Corp.Ltd. Pragati I	475.4	43.4	271.0	-					314.4	6.61					
41	Pragati Power Corp.Ltd. Pragati III (Bawana)	1,197.3	407.8	462.2	-					870.0	7.27					
42	Timarpur Okhla Waste Management Company Private Ltd.	60.0	-	17.2	-					17.2	2.86					
43	Thyagraj Solar	-	-	-	-					-	-					
44	Delhi MSW Solution Limited	48.4	-	34.0	-					34.0	7.03					
45	Jhajjar	42.1	11.4	16.6	0.4					28.4	6.74					
46	Sasan	494.9	7.4	56.9	5.6					69.9	1.41					
47	SECI-ACME(20 MW)	43.7	-	24.0	-					24.0	5.50					
48	Tapovan Vishnugad	49.2	-	21.4	-					21.4	4.35					
49	INOX	72.1	-	25.4	-					25.4	3.53					
50	SECI-ACME	-	-	-	-					-	-					
51	SECI- Azure & Eden	-	-	-	-					-	-					
52	Wind-Alfanar	-	-	-	-					-	-					
53	Wind - Srijan	-	-	-	-					-	-					
54	Wind SITEC	-	-	-	-					-	-					
55	Tehkhand Okhla	-	-	-	-					-	-					
56	<b>Total Long Term Availability (A)</b>	<b>12,700.3</b>	<b>2,173.6</b>	<b>3,926.3</b>	<b>81.3</b>					<b>6,181.1</b>	<b>4.87</b>					
57	Short Term Purchase (B)	658.7		240.3						240.3	3.65					
58	Short Term Purchase (C)	769.6		169.2						169.2	2.20					
59	Transmission Charges (D)												1,087			
60	REC Cost (E)									-						
61	Rebate (F)									-						
62	<b>Net PP Cost (A+B-C+D+E-F)</b>	<b>12,589.4</b>	<b>2,173.6</b>	<b>3,997.4</b>	<b>81.3</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>6,252.2</b>		<b>426.7</b>	<b>1,086.7</b>	<b>12,162.7</b>	<b>7,339.0</b>	<b>6.03</b>



Income from investments and Non-Tariff Income

in Rs. Cr.

Sr. No.	Particulars	FY 2018-19 Actuals	Reference	FY 2020-21 Projection
A	Other Operating Income	132.17	Note 33 of Audited Accounts	<b>Considered same as FY 2018-19</b>
B	Other Income	117.49	Note 34 of Audited Accounts	
I	<b>Total Income as per Accounts</b>	<b>249.66</b>	<b>(A+B)</b>	
C	Add: Interest on CSD	42.05		
D	Add: Differential in SLD	10.64		
II	<b>Total Other Income</b>	<b>302.35</b>	<b>(I+C+D)</b>	
E	Less: Income from other business		(a+b)	
a	<i>Streetlight Maintenance</i>	14.98		
III	<b>Net Income to be considered</b>	<b>287.37</b>	<b>(II-E)</b>	
A	Less: LPSC	30.28	Note 33 of Audited Accounts	
B	Less: Interest on CR		Note 34 of Audited Accounts	
C	Less: Write-back of misc. provisions	24.12	Note 34 of Audited Accounts	
D	Less: Short term gain	2.32	Note 34 of Audited Accounts	
E	Less: Transfer from Consumer contribution for capital works	38.10	Note 33 of Audited Accounts	
F	Less: Bad debts recovered	2.24	Group Income Expenses of Audited Accounts	
G	Less: Interest on Inter-company Loans	21.72	Note 34 of Audited Accounts	
H	Less: Commission on collection of Electricity Duty	10.99	Note 33 of Audited Accounts	
I	<b>Net Non-Tariff Income</b>	<b>157.60</b>	<b>(III-sum A to I)</b>	<b>157.60</b>



BSES RAJDHANI POWER LIMITED											
Contributions towards Cost of Capital Assets											Form No.- F13 in Rs. Cr.
SI No	Particulars	FY 2018-19				FY 2019-20			FY 2020-21		
		Balance at the beginning of the year	Additions during the Year	Capitalized during the year	Balance at the end of the Year	Additions during the Year	Capitalized during the year	Balance at the end of the Year	Additions during the Year	Capitalized during the year	Balance at the end of the Year
	In Rs Crores										
1	Consumer Contribution Towards Cost Of Capital Assets	700	48	-	748	42	-	790	67	-	857
2	Grants towards cost of capital assets		-	-		-	-	-	-	-	-
	<b>Total</b>	<b>700</b>	<b>48</b>	<b>-</b>	<b>748</b>	<b>42</b>	<b>-</b>	<b>790</b>	<b>67</b>	<b>-</b>	<b>857</b>



Energy Balance

S. No	Particulars	FY 2020-21 Projection	
		%	MU
<b>1</b>	<b>Energy Sales</b>		
	a) LT Sales	91.4%	10219
	b) HT Sales at 11kV	5.7%	635
	c) HT Sales at 33kV/ EHT Sales	2.9%	324
	<b>Total Energy Sales</b>		<b>11178</b>
<b>2</b>	<b>Distribution Losses</b>		
	a) Distribution losses at 33kV level above		
	b) Distribution losses in HT 11kV		
	c) Distribution losses in LT system		
	<b>Total Distribution Losses</b>	<b>8.10%</b>	<b>985</b>
<b>3</b>	<b>Energy requirement at T-D boundary</b>		<b>12163</b>
	a) 11kV and LT energy requirement combined		
	b) HT 33kV energy requirement		
	<b>Total energy requirement at T-D boundary</b>		<b>12163</b>
<b>4</b>	<b>Intra-State Transmission Losses</b>	<b>0.92%</b>	<b>113</b>
<b>5</b>	Energy requirement of EHT consumers		
<b>6</b>	Energy Requirement of Distribution system consumers after grossing up for Intra-State Transmission losses		
<b>7</b>	<b>Energy Requirement of Distribution Licensee</b>		<b>12276</b>
<b>8</b>	<b>Inter-State Transmission Losses</b>	<b>3.00%</b>	<b>314</b>
<b>9</b>	<b>Total Energy requirement</b>		<b>12589</b>
<b>10</b>	<b>Total Energy available</b>		<b>13359</b>
<b>11</b>	<b>Surplus / (Deficit)</b>		<b>770</b>



BSES RAJDHANI POWER LIMITED		
Allocation Statement - Revenue Requirement (for the year)		
		Form No.- F17
		in Rs. Cr.
<u>Wheeling Business</u>		FY 2020-21
		Projection
	<b>Expenditure</b>	
A	Power Purchase Cost	
B	O&M Expenses	660
C	Additional O&M Expenses	176
D	Other Expenses/ Statutory Levies	
E	Depreciation	269
F	ROCE	552
G	<b>Total</b>	<b>1,656</b>
H	NTI	24
I	<b>ARR</b>	<b>1,633</b>
J	Carrying Cost	
K	<b>ARR with Carrying Cost</b>	<b>1,633</b>





<b>BSES RAJDHANI POWER LIMITED</b>		
<b>Allocation Statement - Revenue Requirement (for the year)</b>		
		<b>Form No.- F18</b>
		<b>in Rs. Cr.</b>
<b><u>Retail Business</u></b>		<b>FY 2020-21</b>
		<b>Projection</b>
	<b>Expenditure</b>	
<b>A</b>	Power Purchase Cost	7,339
<b>B</b>	O&M Expenses	440
<b>C</b>	Additional O&M Expenses	117
<b>D</b>	Other Expenses/ Statutory Levies	
<b>E</b>	Depreciation	71
<b>F</b>	ROCE	194
<b>G</b>	<b>Total</b>	<b>8,161</b>
<b>H</b>	NTI	134
<b>I</b>	<b>ARR</b>	<b>8,027</b>
<b>J</b>	Carrying Cost	
<b>K</b>	<b>ARR with Carrying Cost</b>	<b>8,027</b>





BSES RAJDHANI POWER LIMITED				
Projection of Sales, Customers & Connected load for metered consumers				
Form No: F22				
EY				
Projection FY 2020-21				
S. No	Category	Projection of Sales (MU)	Projection of no. of Consumers	Projection of Connected Load (MW)
1.1	Domestic	7,884	2,434,926	6,360
1.1.1	Upto 2 KW Connected Load	3,953	1,772,883	2,501
0	0-200 Units	1,261	1,086,570	-
0	201-400 Units	1,573	499,136	-
0	401-800 Units	936	171,648	-
0	801-1200 Units	136	13,286	-
0	Above 1200 Units	46	2,244	-
1.1.2	> 2 KW to ≤ 5 KW Connected Load	1,608	410,230	1,411
0	0-200 Units	156	117,712	-
0	201-400 Units	488	149,662	-
0	401-800 Units	627	111,018	-
0	801-1200 Units	246	25,874	-
0	Above 1200 Units	92	5,965	-
1.1.3	> 5 KW to ≤ 15 KW Connected Load	1,688	233,977	1,958
0	0-200 Units	65	50,197	-
0	201-400 Units	222	53,251	-
0	401-800 Units	502	69,336	-
0	801-1200 Units	379	33,600	-
0	Above 1200 Units	521	27,594	-
1.1.4	> 15 KW to ≤ 25 KW Connected Load	176	9,351	183
0	0-200 Units	1	863	-
0	201-400 Units	2	578	-
0	401-800 Units	11	1,392	-
0	801-1200 Units	19	1,457	-
0	Above 1200 Units	143	5,061	-
1.1.6	> 25 KW Connected Load	197	3,635	165
0	0-200 Units	0	188	-
0	201-400 Units	0	83	-
0	401-800 Units	2	200	-
0	801-1200 Units	3	231	-
0	Above 1200 Units	191	2,933	-
1.2	Single Delivery Point on 11 KV for GHS	205	235	108
1.3	Hospital (11KV)	32	13	14
1.5	DVB Staff	20	4,593	18
2	Non Domestic	2,074	371,702	2,674
2.1	Upto 3 KVA	185	237,889	374
2.2	Above 3 KVA	1,889	133,813	2,300
3	Industrial	394	5,583	313
4	Agriculture	21	6,472	29
5	Mushroom Cultivation	0	14	0
6	Public Utilities (Public Lighting & DJB)	382	9,712	186
7	Delhi International Airport Limited (DIAL)	114	1	51
8	Railway Traction	-	-	-
9	DMRC supply at 66 KV and 220KV	210	9	52
10	Temporary Supply	64	-	-
11	Advertisement and Hoardings	1	971	2
12	Charging Stations for E-Vehicle	18	1,247	7
10.1	Supply at LT	18	1,247	7
10.2	Supply at HT	-	-	-
13	Self Consumption	16	-	-
<b>TOTAL</b>		<b>11,178</b>	<b>2,830,637</b>	<b>9,676</b>



**BSES RAJDHANI POWER LIMITED**  
**Revenue from Proposed Tariff & Charges**

Form No.-F23

Ensuing Year (FY 2020-21)

S. No	Particulars	Energy Sales (MU)	No. of Consumers	Load (MW)	Fixed Charges	Energy Charges	Revenue from Fixed Charges (Rs. Crs.)	Revenue from Variable Charges (Rs. Crs.)	Total Revenue (Rs. Crs.)
1.1	Domestic	7,884	2,434,926	6,360					
1.1.1	Upto 2 KW Connected Load	3,953	1,772,883	2,501					
	0-200 Units	1,261							
	201-400 Units	1,573							
	401-800 Units	936							
	801-1200 Units	136							
	Above 1200 Units	46							
1.1.2	> 2 KW to ≤ 5 KW Connected Load	1,608	410,230	1,411					
	0-200 Units	156							
	201-400 Units	488							
	401-800 Units	627							
	801-1200 Units	246							
	Above 1200 Units	92							
1.1.3	> 5 KW to ≤ 15 KW Connected Load	1,688	233,977	1,958					
	0-200 Units	65							
	201-400 Units	222							
	401-800 Units	502							
	801-1200 Units	379							
	Above 1200 Units	521							
1.1.4	> 15 KW to ≤ 25 KW Connected Load	176	9,351	183					
	0-200 Units	1							
	201-400 Units	2							
	401-800 Units	11							
	801-1200 Units	19							
	Above 1200 Units	143							
1.1.6	> 25 KW Connected Load	197	3,635	165					
	0-200 Units	0							
	201-400 Units	0							
	401-800 Units	2							
	801-1200 Units	3							
	Above 1200 Units	191							
1.2	Single Delivery Point on 11 KV for GHS	205	235	108					
1.3	Hospital (11KV)	32	13	14					
1.5	DVB Staff	20	4,593	18					
2	Non Domestic	2,074	371,702	2,674					
2.1	Upto 3 KVA	185	237,889	374					
2.2	Above 3 KVA	1,889	133,813	2,300					
3	Industrial	394	5,583	313					
4	Agriculture	21	6,472	29					
5	Mushroom Cultivation	0	14	0					
6	Public Utilities (Public Lighting & DJB)	382	9,712	186					
0	-	-	-	-					
7	Delhi International Airport Limited (DIAL)	114	1	51					
0	-	-	-	-					
8	Railway Traction	-	-	-					
9	DMRC supply at 66 KV and 220KV	210	9	52					
10	Temporary Supply	64	-	-					
11	Advertisement and Hoardings	1	971	2					
12	Charging Stations for E-Vehicle	18	1,247	7					
10.1	Supply at LT	18	1,247	7					
10.2	Supply at HT	-	-	-					
13	Self Consumption	16	-	-					
<b>TOTAL</b>		<b>11,178</b>	<b>2,830,637</b>	<b>9,676</b>					

The Hon'ble Commission is requested to allow suitable tariff hike to make cost reflective during FY 2018-19, apart from a suitable surcharge towards recovery of both principal and interest component, on the past accumulated deficit on account of RA.



Current Tariff				Consumer data																	
S.No	Tariff Category	Component of Tariff		Total Sanctioned Load	Total No of Consumers	Total Sales		Fixed charges	Energy charges	ToD Impact	Total Revenue excluding E tax & Surcharge	ABR	Recovery of Accumulated deficit		Recovery of Pension Trust Charges		Electricity Tax	Total Revenue including E tax & Surcharge	ABR		
		Fixed Charges Tariff	Energy Charges Tariff	MW/MKVA	No.	MU	MKVAh	Rs Cr.	Rs Cr.	Rs Cr.	Rs Cr.	Rs./kWh	FC- Rs Cr.	EC- Rs Cr.	FC- Rs Cr.	EC- Rs Cr.	Rs Cr.	Rs Cr.	Rs./kWh		
1.1	Domestic				6360	2434926	7884	496	3275	0	3771	4.78	40	262	19	124	164	4380	5.56		
1.1.1	Upto 2 KW Connected Load				2501	1772883	3953	60	1386	0	1446	3.66	5	111	2	53	69	1,686	4.27		
	0-200 Units	20	Rs/kW/Month	3.00			1261	34	378	0	413		3	30	1	14	19	480			
	201-400 Units	20	Rs/kW/Month	4.50			1573	18	527	0	545		1	42	1	20	26	636			
	401-800 Units	20	Rs/kW/Month	6.50			936	7	380	0	387		1	30	0	14	19	452			
	801-1200 Units	20	Rs/kW/Month	7.00			136	1	71	0	72		0	6	0	3	4	84			
	Above 1200 Units	20	Rs/kW/Month	8.00			46	0	29	0	29		0	2	0	1	1	34			
1.1.2	> 2 KW to ≤ 5 KW Connected Load				1411	410230	1608	85	655	0	739	4.60	7	52	3	25	33	859	5.34		
	0-200 Units	50	Rs/kW/Month	3.00			156	23	47	0	70		2	4	1	2	2	81			
	201-400 Units	50	Rs/kW/Month	4.50			488	30	166	0	196		2	13	1	6	8	228			
	401-800 Units	50	Rs/kW/Month	6.50			627	24	262	0	286		2	21	1	10	13	332			
	801-1200 Units	50	Rs/kW/Month	7.00			246	6	126	0	132		0	10	0	5	6	153			
	Above 1200 Units	50	Rs/kW/Month	8.00			92	1	54	0	55		0	4	0	2	3	65			
1.1.3	> 5 KW to ≤ 15 KW Connected Load				1958	233977	1688	235	859	0	1094	6.48	19	69	9	33	43	1,266	7.50		
	0-200 Units	100	Rs/kW/Month	3.00			65	50	19	0	70		4	2	2	1	1	79			
	201-400 Units	100	Rs/kW/Month	4.50			222	49	80	0	129		4	6	2	3	4	149			
	401-800 Units	100	Rs/kW/Month	6.50			502	68	232	0	300		5	19	3	9	12	346			
	801-1200 Units	100	Rs/kW/Month	7.00			379	35	203	0	238		3	16	1	8	10	276			
	Above 1200 Units	100	Rs/kW/Month	8.00			521	33	325	0	358		3	26	1	12	16	416			
1.1.4	> 15 KW to ≤ 25 KW Connected Load				183	9351	176	44	114	0	158	8.99	4	9	2	4	6	183	10.38		
	0-200 Units	200	Rs/kW/Month	3.00			1	4	0	0	4		0	0	0	0	0	5			
	201-400 Units	200	Rs/kW/Month	4.50			2	3	1	0	4		0	0	0	0	0	4			
	401-800 Units	200	Rs/kW/Month	6.50			11	6	5	0	12		1	0	0	0	0	13			
	801-1200 Units	200	Rs/kW/Month	7.00			19	7	11	0	17		1	1	0	0	1	20			
	Above 1200 Units	200	Rs/kW/Month	8.00			143	24	97	0	122		2	8	1	4	5	141			
1.1.6	> 25 KW Connected Load				165	3635	197	50	146	0	196	9.95	4	12	2	6	7	226	11.50		
	0-200 Units	250	Rs/kW/Month	3.00			0	2	0	0	2		0	0	0	0	0	2			
	201-400 Units	250	Rs/kW/Month	4.50			0	1	0	0	1		0	0	0	0	0	1			
	401-800 Units	250	Rs/kW/Month	6.50			2	2	1	0	3		0	0	0	0	0	3			
	801-1200 Units	250	Rs/kW/Month	7.00			3	2	2	0	4		0	0	0	0	0	5			
	Above 1200 Units	250	Rs/kW/Month	8.00			191	42	143	0	186		3	11	2	5	7	215			
1.2	Single Delivery Point on 11 KV for GHS	150	Rs/kW/Month	4.50	108	235	205	20	92	0	112	5.45	2	7	1	4	5	130			
1.3	Hospital (11KV)	150	Rs/kW/Month	4.50	14	13	32	3	14	0	17	5.29	0	1	0	1	1	19	6.14		
1.4	Worship (11KV)	150	Rs/kW/Month	4.50	2	7	4	0	2	0	2	5.58	0	0	0	0	0	3			
1.5	DVB Staff	20	Rs/kW/Month	3.00	18	4593	20	0	6	0	7	3.21	0	0	0	0	0	8	3.73		
2	Non Domestic				2674	371702	2074	802	1784	14	2600	12.53	64	144	30	68	90	2,996	14.44		
2.1	Upto 3 KVA	250	Rs/KVA/Month	6.00	374	237889	185	112	111	1	224	12.11	9	9	4	4	6	256	13.84		
2.2	Above 3 KVA	250	Rs/KVA/Month	8.50	2300	133813	1889	690	1673	13	2375	12.57	55	135	26	64	84	2,740	14.50		
3	Industrial	250	Rs/KVA/Month	7.75	313	5583	394	94	315	3	412	10.45	8	25	4	12	16	476	12.09		
4	Agriculture	125	Rs/KW/Month	1.50	29	6472	21	4	3	0	8	3.59	0	0	0	0	0	9	4.09		
5	Mushroom Cultivation	200	Rs/KW/Month	6.50	0	14	0	0	0	0	0	8.88	0	0	0	0	0	0	10.25		
6	Public Utilities (Public Lighting & DJB)	250	Rs/KVA/Month	6.25	186	9712	382	56	241	-1	296	7.76	4	19	2	9	-	331	8.67		
7	Delhi International Airport Limited (DIAL)	250	Rs/KVA/Month	7.75	51	1	114	15	89	0	105	9.20	1	7	1	3	-	117	10.29		
8	Railway Traction	250	Rs/KVA/Month	6.25	0	0	0	0	0	0	0	0.00	-	-	-	-	-	-			
9	DMRC supply at 66 KV and 220KV	250	Rs/KVA/Month	6.25	52	9	210	16	133	5	153	7.30	1	11	1	5	-	171			
10	Temporary Supply	250	Rs/KVA/Month	10.40	0	0	64	0	70	0	70	11.87	-	6	-	3	4	82	12.93		
11	Advertisement and Hoardings	250	Rs/KVA/Month	8.50	2	971	1	1	1	0	1	14.79	0	0	0	0	0	1	16.96		
12	Charging Stations for E-Vehicle				7	1247	18	0	8	0	8	4.50	-	1	-	0	0	10	5.26		
10.1	Supply at LT	0	Rs/KVA/Month	4.50	7	1247	18	0	8	0	8	4.50	-	1	-	0	0	10			
10.2	Supply at HT	0	Rs/KVA/Month	4.00	0	0	0	0	0	0	0	-	-	-	-	-	-	-			
13	Self Consumption				0	0	16	0	0	0	0	0.00	-	-	-	-	-	-	0.00		
TOTAL					9676	2830637	11178	1484	5919	21	7424	6.64	119	475	56	226	274	8574	7.67		



**Regd. Off. :** BSES Rajdhani Power Limited,

BSES Bhawan, Nehru Place, New Delhi-110019

**Corporate Identification No.:** U40109DL2001PLC111527

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