Tata Power Delhi Distribution Limited

INDEX

TATA POWER DELHI DISTRIBUTION LTD.
NEW DELHI

INDIA NON JUDICIAL

Government of National Capital Territory of Delhi

e-Stamp

सत्यमेव जयते

Certificate No.	:	IN-DL22682229555753R
Certificate Issued Date	:	17-Jul-2019 11:19 AM
Account Reference	:	IMPACC (SH)/ dlshimp17/ TIS HAZARI/ DL-DLH
Unique Doc. Reference	:	SUBIN-DLDLSHIMP1751831200356768R
Purchased by	:	TATA POWER DELHI DISTRIBUTION LIMITED
Description of Document	:	Article 4 Affidavit
Property Description	:	Not Applicable
Consideration Price (Rs.)	:	0 (Zero)
First Party	:	TATA POWER DELHI DISTRIBUTION LIMITED
Second Party	:	Not Applicable
Stamp Duty Paid By	:	TATA POWER DELHI DISTRIBUTION LIMITED
Stamp Duty Amount(Rs.)	:	10 (Ten only)

NOTARY ★ SAURAJ SINGH DELHI REGD. No.1556 ★ GOVT. OF INDIA

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BEFORE THE HON'BLE DELHI ELECTRICITY REGULATORY COMMISSION

NOTARY SAURAJ SINGH DELHI REGD. No. 1556 GOVT. OF INDIA

FILE NO:

CASE NO:

IN THE MATTER OF:

1. PETITION NO. _______ OF 2020

IN THE MATTER OF: Petition for ARR FY 2020-21.

TATA POWER DELHI DISTRIBUTION LTD. NEW DELHI

Statutory Alert

AND

IN THE MATTER OF: Relevant Provisions of the Electricity Act, 2003 read with Delhi Electricity Reforms Act, 2000 and DERC (Terms and conditions for determination of Tariff) Regulations, 2017 read with DERC Comprehensive Conduct of Business Regulations, 2001 read with DERC Business Plan Regulations, 2019.

AND

IN THE MATTER OF: Tata Power Delhi Distribution Limited (Formerly known as North Delhi Power Limited) having its registered office at NDPL House, Hudson Lines, Kingsway Camp, Delhi-110 009

...Petitioner

AFFIDAVIT ON BEHALF OF PETITIONER/ TATA POWER DELHI DISTRIBUTION LIMITED (TPDDL)

I, **Anurag Bansal**, son of Sh. P.C Bansal, aged about 43 years, residing at C-160, Ashok Vihar, Phase- I, New Delhi-110052, do hereby solemnly affirm as stated hereunder:

1. I say that I am working as DGM, Corporate Legal with Tata Power Delhi Distribution Limited, the Petitioner in the above matter, having its registered office at NDPL House, Hudson Lines, Kingsway Camp, Delhi-110009, and am duly authorised by the said Petitioner to execute the said affidavit on its behalf.

2. I say that the present Petition is being filed by the Petitioner in terms of the Electricity Act, 2003, Delhi Electricity Reforms Act, 2000 read with the Hon'ble Commission's (Terms and Conditions for Determination of Tariff) Regulations 2017, DERC Business Plan 2019, DERC Comprehensive Conduct of Business Regulations, 2001 to seek approval of the Hon'ble Commission for undertaking determination ofARR for FY 2020-21.

3. I say that the statements made and data presented in enclosed petition are true to the best of my knowledge and as per the records of the Petitioner Company and information, estimations received and believed to be true. Further, no material information has been concealed in this aforesaid Petition.

NOTARY GOVT. OF INDIA SAURAJ SINGH DELHI REGD. No. 1556

TATA POWER DELHI DISTRIBUTION LTD. NEW DELHI

ANURAG BANSAL
DEPONENT
D.G.M. - Corporate Legal
Tata Power Delhi Distribution Limited
NDPL House, Hudson Lines
Kingsway Camp, Delhi-110009

VERIFICATION:

I, the Deponent above named, do hereby verify that the contents of my above affidavit are true to my knowledge and belief and no part of it is false and nothing material has been concealed there from.

14 FEB 2020

Verified at New Delhi on this ________ day of ________, 2020

ANURAG BANSAL
DEPONENT
D.G.M. - Corporate Legal
Tata Power Delhi Distribution Limited
NDPL House, Hudson Lines
Kingsway Camp, Delhi-110009

Delhi

Date: 14 FEB 2020

TATA POWER DELHI DISTRIBUTION LTD. NEW DELHI

NOTARY GOVT. OF INDIA SAURAJ SINGH DELHI REGD. No. 1556

ATTESTED

NOTARY PUBLIC
DELHI (INDIA)

14 FEB 2020

3.

सत्यमेव जयते

INDIA NON JUDICIAL

Government of National Capital Territory of Delhi

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Certificate No.	:	IN-DL06709612877049S
Certificate Issued Date	:	08-Jan-2020 10:41 AM
Account Reference	:	IMPACC (SH)/ dlshimp17/ TIS HAZARI/ DL-DLH
Unique Doc. Reference	:	SUBIN-DLDLSHIMP17225345715449025
Purchased by	:	TATA POWER DELHI DISTRIBUTION LIMITED
Description of Document	:	Article 48(c) Power of attorney - GPA
Property Description	:	Not Applicable
Consideration Price (Rs.)	:	0 (Zero)
First Party	:	TATA POWER DELHI DISTRIBUTION LIMITED
Second Party	:	Not Applicable
Stamp Duty Paid By	:	TATA POWER DELHI DISTRIBUTION LIMITED
Stamp Duty Amount(Rs.)	:	100 (One Hundred only)

Sl. No. 94/020
IN NOTARY REGISTER

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This stamp paper has been used to sign this Power of Attorney at New Delhi.

TATA DELHI DISTRIBUTION LTD. NEW DELHI

NOTARY SAURAJ SINGH DELHI REGD. No.1556 GOVT. OF INDIA

Statutory Alert:

1. The authenticity of this Stamp Certificate should be verified at "www.shcilestamp.com". Any discrepancy in the details on this Certificate and as available on the website renders it invalid.
2. The onus of checking the legitimacy is on the users of the certificate.
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POWER OF ATTORNEY

By this power of attorney **Tata Power Delhi Distribution Limited** a body corporate incorporated under the Companies Act, 1956 and having its registered Office at NDPL House , Hudson Lines, Kingsway Camp, Delhi-110009 (hereinafter referred to as the **'Company'**) acting through **Shri Ganesh Srinivasan** S/o, Shri Shrinivasan Appaswami (hereinafter referred as the **'Executant'**),being the Chief Executive Officer (CEO) of the company and holder of Power of Attorney given by the Company and adopted by its Board of Directors on 22.10.2019 hereby appoints **Sh. Anurag Bansal** son of Sh. P C Bansal, aged about 43 years, resident of C- 160 Ashok Vihar Phase-1 Delhi -110052 and working with the Company as the DGM – Corporate Legal vide Employee No. 91079 as the company's Attorney (hereinafter referred to as the **'Attorney'** and to exercise following powers and authorities and to do and perform all or any of the acts , deeds , matters and things herein under specified on behalf of company that is to say :

1. To institute, verify and submit before any court of law or judicial / *Quasi*-judicial forum; any pleadings, documents or information including but not limited to petitions, complaints, criminal complaints, plaints, applications, eviction proceedings, representations, memoranda, appeals, statements of claim, counter claims, set off, execution petitions, replies, written statements, rejoinders, replications, evidence, affidavits, cross objections, counters, review, revision, application for withdrawal of cases, statements of defence, notices, references for arbitration, petitions for setting aside arbitral award and/or to commence, defend and prosecute any legal proceedings or use any other lawful means in order to safeguard the interest or enforce the rights of the Company;
2. To act, appear, plead, argue, file cases, before any Courts, State Electricity Regulatory Commission , Appellate Tribunal for Electricity , Central Electricity Regulatory Commission, Metropolitan Magistrates, Appellate Authority(ies), Forums, Tribunals, Commissions, *Quasi*-judicial bodies, authorities, boards, bureaus and/or any conciliatory, pre-litigative dispute resolution bodies, mediation cells, Lok Adalats, public hearing forums or other alternate dispute resolution channels dealing with matters pertaining to the Company :
3. To compromise, settle, withdraw, make plea–bargaining applications or compound any cases on behalf of and in the interest of the Company;
4. To file and receive documents; to obtain copies of the documents and court orders, awards or the like;
5. To act, appear, plead , argue and lead evidence, settlements or seek enforcement thereof on behalf of the Company before any Arbitral Tribunal, mediator, settlement body or conciliator

194|020
Sl. No. .... IN NOTARY REGISTER

NOTARY SAURAJ SINGH DELHI REGD. No.1566 GOVT. OF INDIA

5.

dealing with cases under Arbitration and Conciliation Act, 1996 and to examine and cross-examine witnesses therein and challenge awards;

6. To act, appear, plead and argue on behalf of the Company or its officers and employees before all Civil Courts dealing with matters pertaining to the Company or its officers or employee and to examine and cross-examine witnesses therein;
7. To do all other lawful acts and deeds which may be necessary to be done in relation to the above and the Company doth undertake to ratify all such acts, deeds and things as may be lawfully and reasonably performed by the said Attorney in terms of the authorization herein contained;

8. To sign '*Vakalatnama*' and appoint advocates or to represent the Company before the Courts as mentioned above;

9. To sign the appeal written statement or replies to the petitions / applications / complaints cross examine witnesses etc.

10. To do all other lawful acts and deeds which may be necessary to be done in the course of the proceedings before the Courts, and other authorities & Forums, tribunals as aforesaid and Company do hereby agrees that all the acts and deeds lawfully done and performed by the above said Attorney in that regard shall be constituted as the acts and deeds done by the Company itself. The Company again doth undertake to ratify and confirm whatsoever that the said Attorney shall lawfully do or cause to be done for the Company solely by virtue of the powers hereby vested.

Sr. No. 194/020
IN NOTARY REGISTER

11. This Power of Attorney shall be effective from 02.12.2019 and all acts, deeds and things lawfully executed or done by the Attorney since 02.12.2019 till execution of this deed of Power of Attorney, are hereby saved and ratified by the Company.

NOTARY SAURAJ DELHI REGD. No.15 GOVT. OF INDIA

12. This Power of Attorney shall supersede any previous attorney and/or authorization executed by the Company (Formerly, North Delhi Power Limited) in favour of the Attorney to do and perform any of the acts which are authorized under this Attorney. Anything done or any action taken or purported to have been done or taken under any such previous power of attorney and/or authorization, shall, in so far as it is not inconsistent with this Power of Attorney, be deemed to have been done under the provisions of this Power of Attorney.

6.

13. The Company ratifies any past lawful act of the Attorney in his lawful capacity as the Employee of the Company and anything done or any such action taken or purported to have been done or taken, shall, in so far as it is not inconsistent with this Power of Attorney, shall be deemed to have been done under the provisions of this Power of Attorney.

14. This Power of Attorney shall remain in force until revoked or till the time said Attorney is in employment of the Company, however, any such revocation shall not affect, any act, thing or deed lawfully done by said Attorney till then in *bonafide* exercise of authority conferred herein.

Sr. No. 194/020
IN NOTARY REGISTER

IN WITNESS WHEREOF THE EXECUTANT HEREBY SCRIBES HIS HAND TO THE ABOVE PRESENTS AT DELHI ON THIS 10th DAY OF Feb. 2020

Executed by	Accepted by	Signatures of the Attorney are identified and attested by the Executant
Mr. Ganesh Srinivasan	Mr. Anurag Bansal	
Chief Executive Officer	DGM – Corporate Legal	
Executant	Attorney	

In presence of :

Witness : Sakshi Mehrotra
Signatures
Name
Address 2nd Floor NDPL House, Kingsway Camp - Delhi - 110009

Witness :
Signatures
Name Shefali Sobti
Address NDPL House, Kingsway Camp, Delhi - 110009.

NOTARY SAURAJ SINGH DELHI REGD. No. GOVT. OF INDIA

ATTESTED
NOTARY PUBLIC
DELHI (INDIA)
10 FEB 2020

7.

Notarial Authentication under Section 85 of Indian Evidence Act 1872

I Saurabh Singh s/o Sh. Late Jasbir Singh Nagar R/o 7/5 Nagar's Area aged about 65 years, I am a licensed Notary Public of the Government of India under the Notaries Act, 1952, and at present operating in Delhi.

I was this 10th Feb day of 2020 present at the Registered Office of the Company at NDPL House , Hudson Lines, Kingsway Camp, Delhi 110009 along with the Executant namely **Shri Ganesh Srinivasan** who is working there as Chief Executive Officer, the Attorney namely **Shri Anurag Bansal** and **Shri Ajay Kalsie, the Company Secretary of the Company.**

The Executant has produced before me his original Voter's Identity Card/Passport/Driving License, which bears his photograph, name, father's name, date of birth and present residential address.

The Executant has also produced before me the certified copy of **Power of Attorney dated 29.01.2020** issued by Board of Directors of the Company affirming that the Executant is at the time of execution of this Power of Attorney, duly authorized by the Board of Directors of the company to execute the same being its constituted attorney and CEO.

The present Power of Attorney, executed by the Executant herein , authorizing Attorney to do all the acts and deeds as recited therein was signed by the Executant and the rubber stamp of the Company was affixed on the instrument in my presence so described and in the presence of **Shri Ajay Kalsie, the Company Secretary of the Company** and that the signatures purporting to be that of the Executant as subscribed at the foot of the foregoing Power of Attorney is in the proper handwriting of the said Executant .

Sr. No. 194/2020 IN NOTARY REGISTER

I, therefore, certify and authenticate that this Power of Attorney is in due form of law, in witness whereof, I have hereunto set my hand and affixed my Seal on this 10th Feb. day of 2020.

ATTESTED

NOTARY PUBLIC
DELHI (INDIA)

Notary Public
Delhi

10 FEB 2020

NOTARY
SAURAJ SINGH
DELHI
REGD. No. 1556
GOVT. OF INDIA

Mr. Ajay Kalsie
Company Secretary
Tata Power Delhi Distribution Limited

NEW DELHI

8.

PETITION SEEKING (i) ARR for FY 2020-21, the FIRST YEAR of 4TH MYT CONTROL PERIOD 2021 to 2023, IN TERMS OF THE DELHI ELECTRICITY REGULATORY COMMISSION (TERMS AND CONDITIONS FOR DETERMINATION OF TARIFF) REGULATIONS, 2017, THE DELHI ELECTRICITY REGULATORY COMMISSION (BUSINESS PLAN) REGULATIONS, 2019, read with ELECTRICITY ACT, 2003 & THE DELHI ELECTRICITY REFORM ACT, 2000 and DERC (COMPREHENSIVE CONDUCT OF BUSINESS REGULATIONS), 2001 and directions issued by the Hon'ble Delhi Electricity Regulatory Commission from time to time.

THE PETITIONER RESPECTFULLY SHOWETH:

1. The Petitioner Tata Power Delhi Distribution Limited (formerly known as North Delhi Power Limited) was incorporated under the provisions of the Companies Act, 1956 with its corporate office at NDPL House, Hudson Lines, Kingsway Camp, Delhi - 110 009. **During financial year 2011-12, the Company applied for change in its name from North Delhi Power Limited to Tata Power Delhi Distribution Limited. Subsequently, a fresh certificate of incorporation consequent to the change in name to Tata Power Delhi Distribution Limited ('the Company') was issued by the Registrar of Companies, N.C.T of Delhi & Haryana on 29 November, 2011 under section 23(1) of the Companies Act, 1956.**

   'The Company' primarily engaged in the business of distribution of electricity in North and North-West Delhi was set up in terms of Delhi Electricity Reforms (Transfer Scheme) Rules 2001. The undertaking of the erstwhile Delhi Vidyut Board (DVB) engaged in distribution and retail supply of electricity in the North & North-West districts in the National Capital Territory of Delhi together with the personnel employed therein were transferred to the Company with effect from 1 July, 2002 which also marked the commencement of commercial operations for the Company.

   The Company has been granted a License under section 20 of the Delhi Electricity Reform Act, 2000 (Act No. 2 of 2001) by the Delhi Electricity Regulatory Commission (DERC) on 11 March, 2004. The License is valid for a period of twenty five years.

2. In terms of License TPDDL w.e.f. July 1, 2002 has been carrying out electricity distribution and retail supply in its Area of Supply as defined in schedule H, Part-III of the Delhi Electricity Reform (Transfer Scheme Rules), 2001 and the Distribution and retail supply license issued by the Hon'ble Commission. The Petitioner has also undertaken generation of electricity (solar and gas based) through its generation wing. However due to curtailment of gas by Ministry of Petroleum and Gas, the gas based generation plant is not operational.

3. The Hon'ble Commission is a **statutory body** and is empowered to regulate the electricity distribution business and determine tariff under section 62 of the Electricity Act 2003.

4. After completion of 2nd MYT Control Period, the Hon'ble Commission enacted the new MYT Regulations, 2017 vide its gazette notification dated 31.01.2017 specifying Terms and Conditions for Determination of Tariff after undertaking the public hearing and stakeholders consultation, to be effective from 01.04.2017 onwards.

5. For sake of convenience and brevity, the said regulations have been referred as the 3rd MYT Regulations 2017 and subsequently the Hon'ble Commission has issued operational norms for Distribution Utilities vide Business Plan Regulations, 2019 which was released on 27th December, 2019 to be read along with 3rd MYT Regulations, 2017.

6. In compliance with the aforesaid regulations/directives, and without prejudice to the Petitioner's rights, remedies available to it under various laws, and pending provisional true up of various claims, review orders, implementation of various judgments before the Hon'ble Commission and pending adjudication of various matters before higher judicial forums, Tata Power Delhi Distribution Ltd. (the Petitioner) is filing this petition seeking for the ARR for FY 2020-21 on the basis of the 3rd MYT Regulations, 2017 and principles laid down in various judgments given by Appellate Tribunal of Electricity, judicial authorities, past practice etc.

TATA POWER DELHI DISTRIBUTION LTD. DELHI

7. The Petitioner has filed its True up Petition for FY 2018-19 on 24th December 2019 seeking provisional true up of revenue gap of Rs 3355.84 Cr. upto FY 2018-19. In the said Petition, the Petitioner has prayed before the Hon'ble Commission seeking
    (i) Allowance of Impact of Judgment pronounced by the Hon'ble APTEL in Appeal no 246 of 2014
    (ii) Allowance of Impact of Rithala Tariff Order pronounced by the Hon'ble Commission for True up upto FY 2017-18
    (iii) Allowance of Impact of Judgment pronounced by the Hon'ble Commission in Petition no 10/2014
    (iv) Allowance of Impact of Judgment pronounced by the Hon'ble APTEL in Appeal no 82 of 2015, Appeal 136 of 2015, Appeal 274 of 2015, Appeal 285 of 2015 and Appeal 58 of 2015
    (v) True up for Rithala for FY 18-19
    (vi) True up of FY 2018-19
    (vii) A realistic and time bound amortization plan to liquidate provisionally trued up Revenue Gap upto FY 2018-19
    (viii) Final True up of Capitalization pending since FY 04-05 till FY 18-19

8. The 3rd MYT Tariff Regulations provides that the Licensee has to file True up Petition for previous year & ARR Petition for ensuing year before 31st Oct of the current year. However due to non-existence of operational norms for FY 2020-21, the ARR Petition could not be filed by the Petitioner. Now the Business Plan Regulation's, 2019 has been notified by the Hon'ble Commission, therefore, the Petitioner is now filing its ARR Petition for FY 2020-21 and prays to the Hon'ble Commission to consider this ARR Petition as an integral part of True up Petition for FY 2018-19.

9. The Hon'ble Commission enacted the Delhi Electricity Regulatory Commission (Terms and Conditions for Determination of Tariff) Regulations 2017 vide notification dated 31.01.2017. In terms of the said Tariff Regulations, 2017 the Hon'ble Commission introduced the concept of enacting Business Plan Regulations [refer Regulation 2(13)] for control period.

The Hon'ble Commission enacted the Business Plan Regulations for third control period (comprising of three years FY 2017-18; 2018-19; 2019-20) on 31.08.2017. The Hon'ble Commission laid down the business plan norms for the various generating, transmission, distribution utilities in Delhi. The control period for the said DERC Business Plan Regulations 2017, being coming to an end in current FY2019-20, the Hon'ble Commission commenced the exercise of finalizing the new Business Plan Regulations, 2019 for the fourth control period (FY 2020-21; 2021-22; 2022-23) through floating the draft Business Plan Regulations followed by due stakeholder consultation. The Petitioner furnished its comments, views to the Hon'ble Commission on various parameters including "*Operation and Maintenance Expenses*". However the Hon'ble Commission while releasing the final form of Business Plan Regulations, 2019 has ignored the submissions of the Petitioner on O&M expenses. The Hon'ble Commission has also vide the said DERC Business Plan Regulations 2019 specifically on O&M expenses, Legal Expenses enacted a Regulation which is not in accordance with the provisions of the Electricity Act,2003 and violates the spirit of the National Tariff Policy. The said 2019 Regulation further ignores certain factors, business realities, practical aspects which have direct bearing on the incurring of O&M expenses, legal expenses which are not in control of the Petitioner. In view of the Petitioner, the DERC Business Plan Regulations 2019, needs re-consideration and judicial review. The Petitioner without prejudice to its rights, contentions is filing the ARR for FY 2020-21 with the Hon'ble Commission. The said ARR petition for FY 2020-21 will be subject to the outcome of any proceedings initiated by the Petitioner, challenging the DERC Business Plan Regulations 2019 before the Competent Court, the Hon'ble Delhi High Court based on legal advice. The Petitioner shall seek consequential orders, revision from the Hon'ble Commission based on the observations, findings, judgment of the Competent Court, the Hon'ble Delhi High Court, as the case may be pursuant to such Legal proceedings being filed against the DERC Business Plan Regulations 2019.

The Petitioner thus seeks, reserves its right to raise its claims in relation to the interpretation/mandate of Business Plan Regulations 2019 , once the same is decided by the Hon'ble Delhi High Court, competent court.

TATA POWER DELHI DISTRIBUTION LTD. DELHI

However, it is being specifically clarified by the Petitioner that by filing the ARR petition for FY 2020-21, such methodology should not be construed as any waiver or concession, omission at the end of the Petitioner in later claiming any consequential orders, based on outcome of the Writ Petitions to be instituted by the Petitioner against such DERC Business Plan Regulations 2019, or other Regulations. It is the submission of the Petitioner that present Petition is being made in line with present DERC Business Regulations 2019 and subject to outcome of the proceedings, Writ matters being filed which have a direct bearing on the DERC Business Plan Regulations, 2019, other Tariff Regulations in Force and ARR determination as well as on the principles enunciated for Wheeling, Retail Supply Tariff as may be decided by any Court, Tribunal or otherwise.

10. The current Petition includes affidavit verifying the Petition and the Power of Attorney for filing the same.
    a. Computation of ARR for FY 20-21

11. It is submitted that apart from the issues already mentioned in the True up petition for FY 2018-19, the present petition is being filed with specific mention and consideration of the Hon'ble Commission on following issues:

1) Amortization of Accumulated Revenue Gap

It is submitted that there was negligible Revenue Gap up to 31.03.2009 amounting to Rs. 161.43 Cr but due to delay in release of tariff order or non-availability of cost reflective tariff, there has been a huge amount of built up of Revenue Gap up to FY 17-18 amounting to Rs. 2,254.50 Cr. as provisionally trued up by the Hon'ble Commission in its Tariff Order dated July 2019. However, the Petitioner in its Ture up Petition for FY 2018-19 has sought provisional Revenue Gap (i.e. Rs. 3,655.84 Cr) upto FY 2018-19 excluding mainly true up of pending capitalization and Rithala tariff order.

TATA POWER DELHI DISTRIBUTION LTD. DELHI

It is worth to mention that the Petitioner has estimated an amount of Rs. 1328.25 Cr & Rs. 1327.95 Cr as revenue gap for FY 2019-20 and FY 2020-21 respectively. This revenue deficit for the year would further increase the trued up provisional revenue gap of the Petitioner. Thus, creation/addition in regulatory assets is a matter of concern for the petitioner and consumers also on which specific consideration of the Hon'ble Commission is required in line with the guidelines issued in **National Tariff Policy issued vide Gazatte Notification dated 28th January, 2016. The relevant extracts of the relevant clause 8.2.2 has been reproduced below:**

"8.2.2 The facility of a regulatory asset has been adopted by some Regulatory Commissions in the past to limit tariff impact in a particular year. This should be done only as a very rare exception in case of natural calamity or force majeure conditions and subject to the following:

a. Under business as usual conditions, no creation of Regulatory Assets shall be allowed;

b. Recovery of outstanding Regulatory Assets along with carrying cost of Regulatory Assets should be time bound and within a period not exceeding seven years. The State Commission may specify the trajectory for the same."

It may be appreciated that the major part of the regulatory asset has been hovering on the petitioner for more than 7 years and recovery of the high accumulated gap continues to remain a concern for the financial health of the Petitioner, given that there is no clear roadmap stipulated for recovery of the same.

In case, there is a delay in amortization of such huge built up of Revenue Gap then it will deteriorate the credit rating of the company, ultimately resulting into higher cost of debt and additional burden of the carrying cost to the consumers. Therefore, it is requested to the Hon'ble Commission to come up with a specific Liquidation Plan.

2) Cost Reflective Tariff to ensure liquidation of Revenue Gap

Without prejudice to the rights, objections, contentions of the Petitioner, it is submitted that due to pending provisional true up of various claims including capitalization, implementation of various judgments before the Hon'ble Commission, pending adjudication of various matters before higher judicial forums and considering the estimated aggregate revenue requirement for FY 2020-21, the Petitioner has estimated provisional Revenue Gap of Rs 6365.90 Cr at the end of FY 2020-21. Further, the Petitioner's claim of revenue gap in this petition is only provisional and shall be subject to revision, change as and when the Hon'ble Commission undertakes final truing up or in the event any judgment/order is passed in any sub judice matters and its impact is to be given effect etc. Thus Petitioner reserves its right to accordingly modify and claim the revenue gap duly taking into account the legal or regulatory developments as the case may be.

As, the Petitioner has projected revenue deficit/gap of Rs. 6365.90 Cr. which will further go up on finalization of past year pending issues like Capitalization and Issues pending for adjudication before judicial authorities. Therefore, to meet this opening revenue deficit, a suitable tariff hike may be approved so that there will be no more addition in the Revenue Gap. It is further requested that the Hon'ble Commission may increase the Deficit recovery surcharge for early liquidation of the accumulated Revenue Gap.

The Petitioner is filing the present Petition to ensure determination of cost reflective tariff. Though the Petitioner has made all efforts and has tried diligently to ensure 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. Such lack of detail/ omission, if any, is only inadvertent and ought not to be treated as a waiver of any entitlement. 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. Nothing presented in the Petition should be treated as restricting, estopping, waiving or limiting the rights of the Petitioner to claims and entitlements which it is permitted to recover under law.

The filing of the Petition shall not be treated as curtailment of 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, the Hon'ble APTEL (including the principle of parity / equality in treatment of DISCOMs but excluding the matters where the Hon'ble Tribunal has

TATA POWER DELHI DISTRIBUTION LTD. DELHI

exclusively granted relief to the Petitioner only) and or any other proceedings relevant to the entitlement of the Petitioner;

The filing of the present Petition is without prejudice to the rights, objections, contentions of the Petitioner with regard to Delhi Electricity Regulatory Commission (Terms and Conditions for Determination of Tariff) Regulations, 2017, The DERC (Business Plan Regulations) 2019. The filing , submission of the Petition shall not be treated as curtailment of any right or claim of the Petitioner, to challenge/ initiate appropriate legal action against any final order resulting from this Petition which has been filed on the basis of the 2nd MYT Regulations, 3rd MYT Regulations read with the DERC Business Plan regulation 2017 as well as any orders/judgments of the Hon'ble Appellate Tribunal of Electricity, the Hon'ble High Court of Delhi, the Hon'ble Supreme Court of India as well as any other forum.

Prayer

In view of the above, the Petitioner respectfully prays that the Hon'ble Commission may be pleased to:

a) **Admit the Petition:** TPDDL requests the Hon'ble Commission to kindly admit the petition for ARR for FY 20-21. Any clarifications, additional information, details sought by the Hon'ble Commission shall be provided as and when directed by the Hon'ble Commission; and/or

b) **Undertake and approve the ARR for FY 2020-21**

c) To give impact of Final True up of Pending Capitalization

d) **Specify the expedited recovery trajectory/ amortization plan** of the Revenue Gap provisionally determined up to FY 2018-19 along with carrying costs to facilitate, enable the Petitioner to avail refinancing of existing loans and repayment etc. from its lenders to make business sustainable; and/or.

e) In the event of any issues raised by the Petitioner in Appeal or Petitions referred above get adjudicated prior to issuance of the Tariff Order, by the Hon'ble APTEL/ Hon'ble

High Court/ Hon'ble Supreme Court and the Hon'ble Commission, the impact of the same may be taken into consideration along with carrying cost while effecting Truing Up exercise; and/or

f) Allow the Petitioner to continue recovery through existing Deficit Revenue Recovery Surcharge or give suitable increase in Deficit Revenue Recovery Surcharge as deemed fit by the Hon'ble Commission; and/or

g) Exercise its inherent powers or powers of relaxation if any sought by the Petitioner or in cases where so deemed fit suo–moto by the Hon'ble Commission in the interest of determination of Tariff; and/or

h) To give due consideration to the issues enumerated above which have been represented through various letters, communications from time to time; and/or

Any other order(s) it may deem fit.

Tata Power Delhi Distribution Limited

Petitioner

New Delhi

Tata Power Delhi Distribution Limited
NDPL House, Hudson Lines
Kingsway Camp, Delhi-110009

ARR for FY 2020-21

As per Regulation 3 of *Delhi Electricity Regulatory Commission (Terms and Conditions for Determination of Tariff) Regulations, 2017*, the Commission has notified Business Plan Regulations, 2019, which contains the following parameter applicable for a Control Period (FY 2020-21 to FY 2022-23):

(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 Asset

....

(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.

Based on the above norms, the Petitioner submits its Aggregate Revenue Requirement for FY 2020-21.

Projected Energy Sales & Billed Revenue for FY 2020-21

To estimate the energy sales for next year, the Petitioner has considered previous year's available growth trends and further assumed that the underlying factors which drive the demand for electricity are expected to follow the same growth trend in future year also. Therefore, demand forecast is based on the assumption that the past consumption growth trend will continue in the future also.

The assumptions considered for forecasting category wise sales are discussed below:

1. The category wise and year wise Compounded Annual Growth Rate (CAGR) has been calculated for the past sales pattern.
2. For those categories where CAGR/ past growth trends are not showing any particular type of movement then the demand has been forecasted based on recent consumption pattern.
3. Impact of Demand Side Management due to replacement of existing electrical equipment's with the star rated equipment's have been considered while forecasting the sales.
4. Impact of Net Metering due to Solar Energy generated by the different categories of consumers has also been factored while forecasting the energy sales. Prospective plans of generation under Net metering is given below.

Category	FY 20-21 (in MUs)
Domestic	3.00
Non Domestic	36.00
Industrial	21.00
Total	**60.00**

5. Impact of movement of consumers under Open Access has also been factored for future years. FY 20-21 projection of reduction in consumption (in MU) and Load (in MW) due to open Access is given below:

Category	FY 20-21 (in MUs)
DMRC	87.00
Industrial	11.00
Non Domestic	12.00
Total	**110.00**

Previous year trends are given below:

Year on Year Category wise billed Sale from FY 2013-14 onwards is given below

In the last 5 years, there has been an annual growth of 4.29% in billed units (i.e. from the level of 7,187 MUs to 8,867 Mus.)

Table 2.1: Category wise summary of units sold from FY 14 to FY 19

Sl. No.	Category	FY14 Sales (MU)	FY15 Sales (MU)	FY16 Sales (MU)	FY17 Sales (MU)	FY18 Sales (MU)	FY19 Sales (MU)	FY20 Sales (MU) Estimated
1	Domestic	3,075	3,313	3,404	3,770	3,947	4,068	4,188
2	Non Domestic	1,278	1,343	1,404	1,463	1,528	1,541	1,537
3	Industrial	2,192	2,279	2,349	2,313	2,432	2,539	2,594
4	Agriculture & Mushroom Cultivation	12	13	13	13	13	14	20
5	Street Lighting	124	144	148	148	154	116	567
6	Delhi Jal Board	204	219	229	239	243	238	
7	Railway	46	46	46	48	51	4	
8	DMRC	134	140	149	149	155	257	
9	Own Consumption	17	17	18	18	19	12	23
10	Advertisement & Hoarding	1	2	1	1	1	0	0
11	Others**	105	100	92	98	94	79	99
	Total	7,187	7,616	7,854	8,261	8,638	8867	9029

** As per Form 2.1a for respective years, all subcategory are merged into one main category, hence figures at some places are not matched with information provided in table B1.2 (iii).*

*** Others includes Staff, Temporary, Theft & Misuse and Own consumptions*

Table 2.2: CAGR of Units Billed based on Main Category wise consumption

Sl. No.	Category	CAGR for 5 years	CAGR for 4 years	CAGR for 3 years	CAGR for 2 years	CAGR for 1 years
1	Domestic	5.76%	5.27%	6.12%	3.87%	3.08%
2	Non Domestic	3.81%	3.49%	3.16%	2.62%	0.84%
3	Industrial	2.98%	2.74%	2.62%	4.77%	4.36%
4	Agriculture & Mushroom Cultivation	3.01%	1.77%	1.07%	4.40%	5.80%
5	Public Utilities	3.91%	2.87%	2.39%	2.57%	1.87%
	Total	4.29%	3.88%	4.13%	3.61%	2.65%

Domestic

The consumption of energy by domestic consumers constitutes substantial part of total sales of the Petitioner.

Based on the actual sales of 4068 MU for FY 2018-19, the Petitioner has computed the given below CAGR over a period of one year to five years.

CAGR for 5 years	CAGR for 4 years	CAGR for 3 years	CAGR for 2 years	CAGR for 1 year
5.76%	5.27%	6.12%	3.87%	3.08%

Considering the available trends of CAGR, the Petitioner has considered a growth rate of 5.27%, (i.e. 4 year CAGR) to estimate the energy sales for domestic consumers.

Further impact due to energy generated under roof top solar has been adjusted in the domestic consumption as per above assumptions.
Based on above the projected consumption for domestic consumers is computed as below:

Table 2.3: Projected billed energy for FY 2020-21

Sl. No.	Category	FY 20 Sales (MU)	Growth (%)	FY 21 Sales (MU)
A	Domestic			
I	Domestic - Others than CGHS	4,165.98	5.27%	4,385.36
	Adjusted due to			
	Metering of Roof top solar			3
	Open Access			-
	Net Consumption - Domestic			**4,382**
II	Single delivery point for CGHS/Hospital	22.4		23.58
	Total Domestic	**4188.38**		**4,406**

Non-Domestic

The consumption of energy by non-domestic consumers constitutes reasonable share of total sales of the Petitioner.

CAGR for 5 years	CAGR for 4 years	CAGR for 3 years	CAGR for 2 years	CAGR for 1 years
3.81%	3.49%	3.16%	2.62%	0.84%

Based on the actual sales of 1541 MU for FY 2018-19, the Petitioner has computed the given below CAGR over a period of one year to five years.

Considering the available trends of CAGR, the projections for next year is envisaged considering a growth rate of 3.49%, (i.e. 4 year CAGR) to estimate the energy sales for Non-domestic consumers.

The Petitioner has further considered the impact of Net Metering arrangement and Open Access for its consumption for Non- Domestic Consumers as per above assumptions.

Based on above projected consumption for non-domestic consumers is computed as below

Table 2.4: Projected billed energy for FY 2020-21

Sl. No.	Category	FY 20 Sales (MU)	Growth (%)	FY 21 Sales (MU)
A	Non-Domestic			
I	Non -Domestic below 3 kVA	1,537.30	3.49%	1,590.96
II	Non -Domestic above 3 kVA			-
	Less: Open Access			12
	Less- Adjustment for Net Metering			36
	Net Consumption			**1,542.96**

Industrial

The consumption of energy by Industrial consumers constitutes approx. 1/3rd part of total sales of the Petitioner. Based on the actual sales of 2539 MU for FY 2018-19, the Petitioner has computed the given below CAGR over a period of one year to five years.

CAGR for 5 years	CAGR for 4 years	CAGR for 3 years	CAGR for 2 years	CAGR for 1 years
2.98%	2.74%	2.62%	4.77%	4.36%

Considering the available trends of CAGR, the Petitioner has considered a growth rate of 2.74%, (i.e. 4 year CAGR) to estimate the energy sales for Industrial consumers.
The Petitioner has further considered the impact of Net Metering arrangement and Open Access for its consumption for Non- Domestic Consumers as per above assumptions.

Based on above projected consumption for Industrial consumers is computed as below

Table 2.5: Projected billed energy for FY 20-21

Sl. No.	Category	FY 20 Sales (MU)	Growth (%)	FY 21 Sales (MU)
A	Industrial			
I	Industrial	2,593.70	2.74%	2,664.66
	Less: Open Access			11
	Less- Adjustment for Net Metering			21
	Net Consumption			**2,632.66**

Agriculture and Mushroom Cultivation

The consumption of energy by Agriculture & Mushroom cultivation consumers constitutes a very small portion of total sales of the Petitioner.

The Petitioner based on the actual sales has computed the given below CAGR over a period of one year to five years.

CAGR for 5 years	CAGR for 4 years	CAGR for 3 years	CAGR for 2 years	CAGR for 1 years
3.01%	1.77%	1.07%	4.40%	5.80%

The Petitioner has considered the CAGR of 4 Year i.e. 1.77% growth for projecting the agriculture & mushroom cultivation consumption.

Table 2.6: Projected billed energy for FY 20-21

Sl. No.	Category	FY 20 Sales (MU)	Growth (%)	FY 21 Sales (MU)
Agriculture & Mushroom				
I	Agriculture & Mushroom	20.29	1.77%	20.65

Public Utilities

The consumption of energy towards public utilities constitutes 7% of total sales of the Petitioner.

Based on the actual sales of 615 MU for FY 2018-19 the Petitioner has computed the given below CAGR over a period of one year to five years.

CAGR for 5 years	CAGR for 4 years	CAGR for 3 years	CAGR for 2 years	CAGR for 1 years
3.91%	2.87%	2.39%	2.57%	1.87%

Based on 4 year CAGR of 2.87% below projected energy is considered for sale

Table 2.7: Projected billed energy for FY 2020-21

Sl. No.	Category	FY 20 Sales (MU)	Growth (%)	FY 21 Sales (MU)
Public Utilities				
I	Public utilities	566.72	3%	583.01
	Less- Open Access			87
	Net Consumption			**496.01**

Own Consumption

The Hon'ble Commission in its Business Plan Regulations, 2019 has stated that normative Own consumption of DISCOM's shall be considered @ 0.25% of billed sales of the respective year. Based on the same the Petitioner is seeking Own consumption as computed below:

Table 2.8: Projected energy from FY 2020-21

Sl. No.	Category	FY 21 Sales (MU)
I	Billed Sale	9,223.14
II	Own consumption @ 0.25%	0.25%
III	Own consumption MU	23.06

Adv. & Hoardings

The consumption of energy by Adv. & Hoardings consumers constitutes a very little portion of total sales of the Petitioner. The Petitioner has considered a growth of 3.49% to project the energy sales for Adv. & Hoardings.

Table 2.9: Projected energy for FY 2020-21

Sl. No.	Category	FY 20 Sales (MU)	Growth Rate	FY 21 Sales (MU)
I	Adv. & Hoardings	0.39	3.49%	0.41

E – Vehicle

Based on the initiatives taken by Government e-vehicle consumption of electricity is projected as below.

Table 2.10: Projected energy for FY 2020-21

Sl. No.	Category	FY 20 Sales (MU)	FY 21 Sales (MU)
I	E vehicle	14.26	14.26
II	Additional requirement due to E- Buses/E- Car		21
III	**Total**		**35.26**

Others (including Temporary Supply, Misuse and Theft)

The Petitioner has projected following sale for temporary, misuse, Theft and Staff category consumers.

Table 2.11: Projected energy for FY 2020-21

Sl. No.	Category	FY21 Sales (MU)
I	Others	89.1
II	Mushroom	0.15

Based on the above assumptions and explanations, the category wise estimated summary of billed sale (MU) for FY 20-21 is given below:

Table 2.12: Projected Sales (MU) for FY 2020-21

Sl. No	Category	FY 2020-21 Projections
A	Domestic	4405.58
	Domestic - Others than CGHS	4382.00
	Single delivery point for CGHS/Hospital	23.58
B	Non –Domestic	1542.96
C	Industrial	2632.66
D	Agriculture	20.65
E	Mushroom Cultivation	0.15
F	Public Utilities	496.01
G	Adv. & Hoardings	0.41
H	E-Vehicle	35.26
I	Others* including Temporary Supply	89.10
J	Own consumption	23.06
	Total	**9245.84**

**Others includes Staff, Own Consumption, Theft & Misuse*

Estimated Consumers for next year

The Petitioner has projected approx. 17.93 lacs consumers for FY 2020-21. Category wise breakup of Consumers is given below:

Table 2.13: Given below is the projected number of consumers for Next year

Sl. No.	Category	FY 2020-21
A	Domestic	1492412
B	Non –Domestic	236433
C	Industrial	31929
D	Agriculture	4264
E	Mushroom Cultivation	9
F	Public Utilities	5949
G	Adv. & Hoardings	238
H	Others- including E vehicle	22152
	Total	**1793386**

Estimated Consumer Load for next year

For the purpose of computing fixed charges, the Petitioner has projected load of 6153 MW for FY 2020-21. Category wise break up of consumers load is given below:

Table 2.14: Given below is the projected number of consumer's load for Next year

Sl. No.	Category	FY 2020-21
A	Domestic	3093
B	Non –Domestic	1331
C	Industrial	1445
D	Agriculture	31
E	Mushroom Cultivation	0
F	Public Utilities	164
G	Adv. & Hoardings	1
H	Others- including E vehicle	89
	Total	**6154**

Estimated Revenue at existing Tariff for next year

The Hon'ble Commission has followed two-part tariff principle for each consumer category (except CGHS colonies) consisting of fixed/ demand charges as well as energy charges.

1. The fixed/ demand charges are specified for different categories as a fixed amount per month or as a fixed amount per kW of sanctioned load per month.
2. The energy charges, on the other hand, are always usage-based and are specified per unit of electricity consumed.

In order to reduce the cost of power purchase during peak hours the Hon'ble Commission has implemented TOD (Time of Day Tariff) wherein peak hour consumption is charged at higher rates which reflects the higher cost of power purchase during peak hours. At the same time, a rebate is being offered on consumption during off peak hours. This is also meant to incentivize consumers to shift a portion of their loads from peak time to off peak time. The Hon'ble Commission in its Tariff Order September, 2015 has reviewed the TOD time slots and restrict the applicability of TOD for the period May- September instead of whole year.

It is further clarified that the Hon'ble Commission vide its Tariff Order dated July, 2012 has introduced 8% Deficit recovery surcharge which is directly linked with the aforesaid two part tariff. The aforesaid surcharge has been imposed for recovery of previous years accumulated Revenue Gap and carrying cost which otherwise has to be met through increase in two- part tariff. The Hon'ble Commission has instead of increase in basic two part tariff introduced additional surcharge directly linked to the fixed charges/ demand charges and energy charges.

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Methodology for Computation of Fixed Charges for Domestic Consumers

a) For Domestic consumers with sanctioned load less than 5 kW, the revenue from fixed charges is calculated by multiplying the corresponding fixed charge with the number of month for respective consumers in that particular tariff slab.

b) For Domestic consumers with sanctioned load exceeding 5 kW, the revenue from fixed charges is calculated by multiplying the specified fixed charge with the connected load (in kW) of the category.

Methodology for Computation of Energy Charges for Domestic Consumers

For calculation of revenue from energy charges, the actual usage is multiplied by the applicable tariff category slab.

Methodology for Computation of Fixed Charges & Energy Charges for other than Domestic Consumers and Advertisement & Hording Consumers

For Non-Domestic, Industrial, public utilities billing is done either on kW or kVA basis, as specified in the last approved tariff schedule. Since projections for next 5 years are done only on kW basis for sanctioned load and on kWh basis for energy sales, wherever the tariff is specified in kVA/kVAh terms, the relevant kW/kWh projection is divided by the Power Factor in order to obtain the corresponding kVA/kVAh projection. Thereafter, revenue from demand charges is calculated by multiplying the demand charge of each tariff slab with the sanctioned load of that slab, while revenue from energy charges is calculated by multiplying the energy charges specified for each tariff slab with the energy consumption projected for that slab.

Based on the above factors i.e. energy billed, no. of consumers, consumer load, Tata Power-DDL has estimated revenue at existing retail supply Tariff for next year.
Category wise estimated Revenue Billed for respective year of control period is given below:

Table 2.15: Estimated Billed Revenue for FY 20-21 **(Rs Cr)**

Category	Fixed Charges	Energy Charges	TOD Tariff	Total Revenue	ABR Rs/kWh	3.80% PT
Domestic	200.9	1669.74	0	1870.65	4.25	71.08
Non –Domestic	404.04	1300.49	24.63	1729.16	11.21	65.71
Industrial	436.59	2091.51	37.12	2565.21	9.74	97.48
Agriculture	4.64	3.1	0	7.74	3.75	0.29
Mushroom Cultivation	0.02	0.1	0	0.12	8.00	0.00
Public Utilities	49.12	333.76	0.97	383.85	7.74	14.59
Adv. & Hoardings	0.16	0.34	0	0.5	12.20	0.02
E Vehicle	0	6.42	0.03	6.45	1.83	0.25
Others	7.46	60.03	0.05	67.54	6.02	2.57
Total	**1102.93**	**5465.50**	**62.8**	**6631.23**	**7.17**	**251.99**
8% Deficit Revenue Surcharge				**530.50**		

Collection efficiency

The Hon'ble Commission has approved collection target of 99.50% for 4th MYT Control period vide Regulations 26(1) of Delhi Electricity Regulatory Commission Business Plan Regulation, 2019.

Relevant extract of the same is given below:

26. TARGET FOR COLLECTION EFFICIENCY

(1) The targets for Collection Efficiency for FY 2020-21 to FY 2022-23 of the Distribution Licensees shall be 99.50%.

Based on above, collection efficiency at 99.50% level is considered for FY 2020-21.

Table 2.16: Estimated Energy Collection **(Rs. Cr)**

Sl. No.	Particulars	Amount	Remark
A	Estimated Billing at Current Tariffs –without DRS, E tax & Pension Trust	6,631.23	Table 2.15
B	Collection Efficiency	99.50%	
C	Estimated Collection	6,598.07	(A*B)

Target for Distribution Loss Level

The Hon'ble Commission in its Business Plan Regulations, 2019 has approved distribution loss reduction targets as mentioned in table below in terms of Regulation 4(9)(a) of the DERC (Terms and Conditions for Determination of Tariff) Regulations, 2017:

Table 2.17: Distribution loss level for 4th MYT Control Period

Category	FY 2020-21	FY 2021-22	FY 2022-23
Approved Distribution Target Loss level	7.90%	7.80%	7.70%
Year on Year reduction in distribution loss level		0.10%	0.10%

Based on above table, distribution loss level of 7.90% for FY 2020-21 has been considered and corresponding energy requirement at TPDDL periphery comes to 10,038.91 MU for FY 2020-21.

Table 2.18: Estimated Energy Requirements for FY 20-21

Sl. No.	Particulars	UoM	Amount	Remark
A	Expected Sales	MU	9,245.84	Table 2.12
B	Distribution Loss	%	7.90%	Table 2.17
C	Energy Input (at TPDDL periphery)	MU	10,038.91	((A/(1-B))*100)
D	Distribution Loss	MU	793.07	(C-A)

Power Purchase Projections for FY 20-21

Power purchase cost is the single largest component of ARR for a distribution company and hence the same is being submitted as part of MYT Regulations considering power from both existing as well as future renewable power stations.

Allocation of Power from Central and State Generating Stations

- Delhi has a firm allocated share in Central Sector Generating Stations (CSGS), State Generating Stations (SGS) and other stations. For the purpose of projecting the units, the latest allocation order has been considered.
- Further, allocation from various stations has been considered as per the Hon'ble Commission Tariff Order for FY 2019-20.
- It is further clarified that no power from unallocated quota has been considered for projection purposes.
- Banking/ Bilateral transactions are not considered, All the short term purchase and sale transactions are considered at exchange only.

Energy Availability from the Central Sector, State Sector and Other Generating Stations

The Energy available in MU's for the purpose of projections has been computed as below:

Power Procurement from central & State Generating Stations (MU)

(i) No energy is considered to be scheduled from Rithala in view of DERC directive.

(ii) The generation expected from Own TPDDL- Solar installed capacity has been considered of 1.65 MW @ 15% CuF.

(iii) Power procurement from IPGCL GT is considered upto FY 31st March 2021 in line with useful life and PPA with GTPS.

(iv) To estimate the energy (MU) which would be scheduled from the long term sources; stations like Hydro, Nuclear, Renewable & Delhi Genco stations have been considered as must run stations. All other plants have been considered to be running at minimum technical limit (MTL) and further, it has been assumed that the plants having ECR less than the estimated sale rate at exchange shall be scheduled to the maximum allocation for maximizing the sale rate of surplus power.

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Based on above assumption, power purchase & its cost from various state generating stations for next year is given below:

Power Procurement cost of the above State Generating Plant (Rs Cr.)

To compute the power procurement cost for next year, the following assumptions are considered:

(i) Increase in Actual Fixed Cost or Fixed Cost is considered based on currently available information/tariff orders.

(ii) Based on the actual variable cost for last 3 months (September 19 to November'19) for each generating station, the same variable rate is considered for the purpose of projections. It is further clarified that no increase is factored in variable cost for any of the plant for next year.

Table 2.19: Projected Power Purchase From State Generating Stations for FY 2020-21

Sl. No.	Stations	Petitioner Share (MU)	Fixed Charge (Rs Cr)	Variable Charge (Rs Cr)	Total Charge (Rs Cr)
A	**State Generating Stations**				
I	Pragati	263	36	136	172
II	GT	175	40	71	111
III	Pragati III	876	283	310	593
	Total SGS	**1314**	**360**	**516**	**876**

Central Sector Generating Stations

(i) Thermal Plants: The estimates for energy availability from coal based plants are based on the normative month wise availability (PAFM) of the stations.

(ii) Energy from Nuclear Stations: Energy from nuclear stations (NAPS and RAPS) is taken as per actual energy scheduled during previous years.

(iii) Hydro Plant: The estimation is based on the month wise design energy of each plant and prorated for TPDDL share.

(iv) To estimate the energy (MU) which would be scheduled from the CSGS, it has been assumed that the plants having ECR less than the estimated sale rate at exchange shall be scheduled to 85% of allocation.

(v) Scheduling from these Central Generating Stations Plants have been factored @ 85%, but if variable rates of any station found higher than the sale rate at exchange for that particular month scheduling is restricted to 55%. (Minimum Technical Limit)

(vi) No New Thermal capacity addition has been considered.

Future Capacity addition & deletion: Year wise addition in new plants is given below:

a) New Plant Additions in FY 2020-21

SECI Solar - 100 MW at Rs. 2.57/- at 23% Cuf from October - 2020

SECI Solar - 200 MW at Rs. 2.66/- at 23% Cuf from January - 2021

Sun Edison - 180 MW at Rs. 3.96/- at 24% Cuf for entire year

Taranda Hydro - 13 MW at Rs. 4.29/- at 45% Cuf for entire year

SECI Wind - 50 MW at Rs. 2.52/- at 40% Cuf for entire year

SECI Wind - 50 MW at Rs. 2.59/- at 40% Cuf for entire year

NTPC Tapovan Vishnu Garh 21 MW (1 Cr. per MW)

Transmission charges for the new renewable addition factored in PGCIL and DTL charges as it is expected that new network/transmission lines will be required & the cost for the same will have to be borne by existing beneficiaries as part of POC charges.

Power Procurement cost of the above Central State Generating Plants (Rs Cr.)

To compute the power procurement cost for next year, the following assumptions are considered:

(i) Increase in Actual Fixed Cost or Fixed Cost is considered based on currently available information.

(ii) Based on the actual variable cost for past 3 months (September'19 to November'19) for each generating station, the same is considered for the purpose of projections. It is further clarified that no increase is factored in variable cost for any of the plant for next year.

(iii) For the new hydro plant additions, the cost has been taken equivalent to the cost of Parbati-III plant (i.e. 1 Cr./Mw)

Based on above assumption, power purchase MU & its cost from Central State Generating stations for next year is projected as below:

Table 2.20: Projected Power Purchase from Central Generating Stations

Sl. No.	Source	Petitioner Share	Fixed Charge	Variable Charge	Total Charge
		(MU)	(Rs Cr)	(Rs Cr)	(Rs Cr)
	Central State Generating Stations				
	NTPC				
I	Singrauli	319	21	44	65
II	Rihand STPS-I	211	18	29	47
III	Rihand STPS-II	271	23	36	59
IV	Rihand STPS-III	0	0	0	0
V	ANTA	6	7	2	9
VI	Auriya GPS	4	10	2	12
VII	Dadri GPS	26	12	11	22
VIII	Unchahaar-I TPS	32	5	11	17
IX	Unchahaar-II TPS	63	10	22	32
X	Unchahaar-III TPS	39	8	14	22
XI	Dadri (Th)	50	7	22	29
XII	Dadri (Th) II	55	11	22	33
XIII	Kahalgaon-I TPS	106	11	24	35
XIV	Kahalgaon-II TPS	339	37	72	109
XV	Farakka	45	4	11	15
XVI	Aravali	3115	715	1167	1,883
	Total	**4,680**	**900**	**1,487**	**2,387**
	NHPC				
I	Bairasul	20	3	2	5
II	Salal- I	0	0	0	0
III	Tanakpur	13	2	2	4
IV	Chamera-I	55	5	6	11
V	Chamera-II	58	6	6	12
VI	URI	84	6	7	13

VII	URI II	48	9	11	21
VIII	Dhauliganga	42	4	5	9
IX	Sewa II	23	6	5	10
X	Parbati HEP-III	25	6	4	10
XI	Chamera-III	38	9	8	17
XII	Dulhasti	75	20	21	40
XIII	Parbati-II	0	0	0	0
XIV	Vishnugarh Pipalkoti (THDC)	0	0	0	0
XV	Tapovan Vishnugarh (NTPC)	83	10	10	21
	Total	**565**	**84**	**88**	**172**
	THDC				
I	Tehri HPP	59	13	11	24
II	Koteshwar HEP	35	7	8	15
	Total	**94**	**20**	**20**	**39**
	DVC				
I	DVC (CTPS 7&8)	588	95	147	243
II	DVC (MTPS 6)	165	27	52	79
	Total	**753**	**122**	**199**	**322**
	NPCIL				
I	NAPS	97	0	29	29
II	RAPS	115	0	45	45
	Total	**213**	**0**	**74**	**74**
	SJVNL				
I	Naptha Jhakri	181	25	22	47
	Total	**181**	**25**	**22**	**47**
	Others				
I	Tala	30	0	7	7
II	Sasan, MP	451	9	52	60
III	CLP Jhajjar	680	93	264	357

IV	MPL	1,907	326	510	836
V	Tehri Pump Storage	0	0	0	0
	Total	**3,067**	**428**	**832**	**1,260**
	Total CSGS	**9,553**	**1,578**	**2,723**	**4,301**

Renewable Power Purchase Obligation

The Hon'ble Commission has notified the Delhi Electricity Regulatory Commission (Renewable Purchase Obligation & Renewable Energy Certificate Framework Implementation) Regulations, 2012 with effect from October, 2012.

Further the Hon'ble Commission in its Business Plan Regulation's 2019 for 4th MYT Control Period has notified the following RPO trajectory for DISCOM:

Table 2.21: Targets for Renewable Power Purchase Obligation

Sl. No.	Distribution Licensees	FY 2020-21	FY 2021-22	FY 2022-23
A	Solar Target	7.25%	8.75%	10.50%
B	Non Solar Target	10.25%	10.25%	10.50%
C	Total	17.50%	19.00%	21.00%

Based on above targets following RPO/REC cost has been considered for FY 20-21:

Table 2.22: RPO Compliance for FY 20-21

Sl. No.	Particulars	UoM	FY 20-21	
			Solar	Non Solar
A	Projected Energy sale for FY 2020-21 Less: Hydro	MU	8,375.90	
B	RPO target	%	7.25%	10.25%
C	RPO target in units	MU	607.25	858.53
D	RPO Compliance through	MU	690.72	245.46
	Purchase from TPDDL Solar	MU	2	
	Purchase from SECI Solar (20 MW)	MU	40	
	Purchase from SECI Solar 1 (100 MW)	MU	100	
	Purchase from SECI Solar 2 (200 MW)	MU	99	
	Sun Edison (180 MW)	MU	378	
	Net Metering- at Gross	MU	70	
	Purchase form Bawana W2E	MU		43
	Purchase from Small Hydro	MU		166
	Purchase from TOWMCL	MU		37

Sl. No.	Particulars	UoM	FY 20-21	
			Solar	Non Solar
E	Excess/ (Shortfall)= (C-D)	MU	(83.47)	613.07
F	Inter head adjustment	MU	83.47	(83.47)
G	Requirement to be met through purchase of REC	Rs Cr		529.60
H	REC rate + 12% GST	Rs/kWh	2.69	3.36
I	Cost for REC purchase	Rs Cr		177.95
	Total REC			**177.95**

Power Procurement through NET Metering:

TPDDL would further like to submit that, TPDDL has already undertaken an assessment of roof top potential in its area and accordingly, the following is estimated:

Solar Capacity	Target / Milestone FY 20-21
Capacity in MW	23
Energy in MU	10

MU due to Net Metering Capacity addition has been calculated after assuming a CuF of 17%

Additionally the Petitioner would like to submit that with DMRC and other Open Access consumers pursuing open access from Renewable sources; the same would also add up to meeting of the RPO requirements of the Petitioner considering Discoms and Open access consumers as Obligated Entities. This shall reduce the RPO requirements to be met by the Petitioner on a stand-alone basis substantially as cumulative RPO met of obligated entities like the Petitioner and future expected open access consumers having substantial load like DMRC and other Open Access consumers shall add up the RPO mandates of the Hon'ble Commission.

Table 2.23: Power Purchase from solar and non-solar generating stations

Sl. No.	Stations	Petitioner Share (MU)	Total Charge (Rs Cr)
A	Solar		
	TPDDL Solar	2	3
	SECI Solar (20 MW)	40	22
	SECI Solar1 (100 MW)	100	26
	SECI Solar2 (200 MW)	99	26
	Sun Edision	378	150
	Net Metering	10	5
	Sub-Total	631	233
B	Non Solar		

	Bawana W2E	43	30
	TOWMCL	37	24
	Small Hydro	166	69
	Sub-Total	245	123
	Total	**876**	**356**

Short Term Purchase

Total short term purchase for FY 20-21 has been considered as below:

Table 2.24: Projected Units purchase

Other Sources	Projection FY 20-21		
	MUs	(Rs Cr)	Av. Rate
Power Purchase from Other Sources			
Inter-State Bilateral Purchase			
Intra-State Power Purchase			
Other Purchases Total	**145**	**48.37**	**3.34**

Short Term Sale

Surplus unit: Based on the energy required at TPDDL periphery and Gross Power Purchased schedule to TPDDL, the surplus power available for sale is determined which shall be sold and the sale proceeds shall entirely go towards reducing the net power purchase cost charged to consumers.

Given below is the surplus power available for sale in FY 20-21:

Table 2.25: Short Term Power Sale

Source	Amount
Sale of Surplus Power – MU	1,481.48
Revenue from Sale of Surplus Power	441.28
Per unit Rate- Rs/kWh	2.98

Transmission Losses

Transmission losses have been considered @ 3% for PGCIL & DTL as a whole.
Given below is the year on year projected transmission losses for FY 20-21:

Table 2.26: Transmission Losses for FY 20-21

Source	MU's
Inter-State Transmission	**368.54**
Intra-State Transmission (DTL)	
Total Transmission Losses	

Transmission Charges:_year on year transmission charges including increase in transmission charges on account of new transmission lines/network required for enhanced renewable capacity which will get socialized amongst the transmission beneficiaries:

Table 2.27: Transmission Charges (Rs Cr.) for FY 20-21

Source	Amount (Rs Cr)
PGCIL Charges	626
DTL & SLDC Charges	269
Other Transmission charges, LDC charges. STOA Charges	79
Total (excluding Pension Trust)	**974**

**STOA charges of Rs. 0.50/unit has been factored as a part of transmission cost.*

STOA charges should be credited by DTL on monthly basis which at present is not being passed on by DTL. This delays the recovery and undue benefit of Working capital to DTL. Thereby unnecessary carrying cost burden to retail consumers.

Additional Impact due to CERC Tariff Regulations, 2019 on FGD

Flue-gas desulfurization (FGD) cost has been considered FGD cost has been factored in the year as mentioned in the CPCB sheet. Increase in Variable Cost on account of FGD has already been factored in normal energy charges and Fixed charges has been considered separately as a part of Power Purchase Cost for FY 2020-21.

Table 2.28: Additional Impact due to CERC Tariff Regulations, 2019 on FGD

Source	2020-21
	Fixed
Aravali	157.93
CLP Jhajjar	6.52
Total	164.45

Normative Rebate

CERC in its Tariff Regulations (19-24) has reduced rate of normative rebate from the existing rate of 2% to 1.50%. However, the Hon'ble Commission has kept the normative rebate at 2% p.m. Therefore, normative rebate for the purpose of Power Purchase cost is computed in table below:

Table 2.29: Normative Rebate for FY 2020-21

Gencos		Amount (in Rs Cr)
State Generating Stations		
Pragati & GT	2.00%	5.66
Pragati III	1.50%	8.90
Central Generating Stations		
NTPC	1.50%	35.81
NHPC	1.50%	2.58
NPCIL	2.50%	1.85
Others	1.50%	25.02
Transmission		
DTL & SLDC	2.00%	5.38
PGCIL	1.50%	9.39
Total		**94.58**

Energy balance for FY 20-21 is as follow:

Based on all above submission, Energy balance for FY 20-21 is given below:

Table 2.30: Energy Balance for FY 20-21

Sl. No.	Particulars	Energy MU	Amt Rs Cr	Rate Rs/unit
A	Power from CSGS	9,553.31	4,301.05	4.50
B	Power from SGS	1,314.03	875.96	6.67
C	Short Term Power Purchase	145.00	48.37	3.34
D	RPO obligation to be met through purchase from renewable sources	876.25	355.84	4.06
E	RPO obligation to be met through purchase of REC		177.95	
F	FGD		164.45	
G	**TOTAL Purchase**	**11,888.59**	**5,923.62**	**4.98**
H	Transmission losses (Intra state & Interstate)	-368.54		
I	Transmission charges		973.75	
J	**Total Purchase with Tx**	**11,520.05**	**6,897.37**	5.99
K	Less: Short Term surplus power sale	-1,481.13	-441.18	2.98
L	Less: Normative Rebate		-94.58	
M	**Net Power Purchase Cost**	**10,038.91**	**6,361.61**	**6.34**

Operation & Maintenance Expenses for FY 2020-21

The Hon'ble Commission in its Business Plan Regulations, 2019 has notified norms for operation and maintenance expenses in terms of Regulation 4(3).

Based on the estimated average network capacity for FY 2020-21, the Petitioner is seeking O&M Expenses for FY 2020-21 as given in table below.

Table 2.31: Projected Normative O&M Expenses for FY 2020-21 **(Rs Cr)**

Particulars	Average Capacity	O&M Expenses Per Unit		O&M Expenses
66 kV Line (kms)	1,091.08	Rs. Lakh/Ckt. Km	3.079	33.59
33 kV Line (kms)				
11 kV Line (kms)	6,910.36	Rs. Lakh/Ckt. Km	0.935	64.61
LT Lines system (kms.)	7,340.86	Rs. Lakh/Ckt. Km	7.338	538.67
66/11 kV Grid sub-station (MVA)	4,922.96	Rs. Lakh/MVA	0.954	46.97
33/11 kV Grid sub-station (MVA)				
11/0.4 kV DT (MVA)	6,170.00	Rs. Lakh/MVA	1.489	91.87
Total normative O&M Expenses				**775.71**

It is further mentioned that the average capacity considered for computation of O&M expenses are subject to change based on actual capitalization.

Any statutory levies arising due to Government of India's Notification or Change in law but not factored in base year expenses shall be claimed separately over and above normative allowed expenses.

Legal Expenses

The Hon'ble Commission in its "Statement of Reason on Business Plan Regulations 2019" has provided the treatment of Legal Expenses in its Explanatory Memorandum as follows:

"(6) 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."

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With respect to above, the Petitioner would like to mention that legal expenses incurred by the Petitioner shall be allowed without any distinction. Non allowance of some legal expenses amounts to curtailment of Statutory Right of the Petitioner to challenge the decisions of the Commission and is against the principle of natural justice as well the same is against Article 14 of the Constitution of India. The distribution business is a regulated business under the aegis of this Commission. The majority of issues in Distribution Business will arise out of orders/ directions issued by the Commission. In all such case, the Petitioner has right to challenge the same before the Hon'ble Appellate Tribunal for Electricity and Hon'ble Supreme Court thereafter. The final Judgment passed at the Appellate stage will be binding on both the DISCOM as well as the Hon'ble Commission. Therefore, all legal expenses without any distinction should be allowed as an expense in the ARR.

The Petitioner request to the Hon'ble Commission to allow Rs 15 Cr. on adhoc basis in the ARR for FY 2020-21. The said amount shall be trued up based on prudence check of actual legal expenses.

Table 2.31(a): Projected Normative O&M Expenses for FY 2020-21 **(Rs Cr)**

Particulars	O&M Expenses	Remarks
Normative O&M Expenses for FY 2020-21	775.71	Table 2.31
Legal Expenses	15.00	
Total O&M Expenses	**790.71**	

Capitalization for FY 2020-21

The Hon'ble Commission in its Business Plan Regulations, 2019 has approved capitalization of Rs 465 Cr. for FY 2020-21 (excluding Rs. 50 Cr towards Capital Deposit).

Table 2.32: Approved Capitalization for FY 2020-21 **(Rs. Cr.)**

Particulars	Amount
Capitalization including deposit work	413
Smart Meter	102
Less- Deposit work	50
Total Capitalization excluding deposit work	465

It is worth to mention that deposit work is already treated as a part of capitalization, thus, gross capitalization for FY 2020-21 is considered as given below:

Table 2.33: Capitalization considering Deposit work for FY 2020-21 **(Rs. Cr.)**

Particulars	Amount
Capitalization without deposit work	363
Smart Meter	102
Deposit Work	50
Total including Deposit Work	**515**

Considering the capitalization of Rs. 515 Cr, gross block of fixed assets for FY 2020-21 works out as follows:

Table 2.34: Capitalization of Fixed Assets **(Rs Cr)**

Sl. No.	Particulars	Amount	Remark
A	Opening Balance for FY 19-20	5,565.02	As per True up Petition FY 18-19 Table no 3.45 filed Annexure 1
B	Projected Additions for FY 19-20	480.00	Para 4.125 of TO 2019-20
C	Opening balance for FY 20-21	6,045.02	(A+B)
D	Addition during the year	515.00	Table 2.33
E	Deletion during the year*		
F	Closing Balance	6,560.02	(C+D-E)
G	Average Balance of Fixed Assets	6,302.52	((C+F)/2)

**No deletion has been considered*

Contributions, Grants, subsidies towards cost of Capital Assets

The contribution towards cost of capital assets is transferred to sources of funds in the balance sheet when the assets for which such contribution is received are capitalized. It is estimated that Rs 50 Cr will be capitalized towards consumer contribution for FY 20-21 and thereafter.

Table 2.35: Estimated Consumer Contribution capitalized (Rs Cr)

Sl. No.	Consumer Contribution/Grant	Amount	Remarks
A	Opening Balance for FY 19-20	868.51	As per True up Petition FY 18-19 Table no 3.46 filed Annexure 2
B	Projected Additions for FY 19-20	50.00	As per Tariff Order Table no 4.46 for FY 19-20
C	Opening balance for FY 20-21	918.51	(A+B)
D	Capitalized during the year	50.00	Equal to Deposit work capitalized amount
E	Closing Balance	968.51	(C+D)
F	Average Cumulative Capitalized Consumer Cont.	943.51	(C+E)/2

Depreciation and Provision of Depreciation

The Hon'ble Commission in its 4th MYT Regulation's has followed same methodology for allowance of Depreciation as in 3rd MYT Regulations. Based on the said regulations the Petitioner has changed depreciation rate in its books of account. Thus, for the purpose of computation of Deprecation for FY 2020-21, the Petitioner has considered Deprecation rate of 4.98% equivalent to the rate considered for FY 19-20 in July 19 Tariff Order.

Table 2.36: Estimated Depreciation (Rs Cr)

Sl. No.	Particulars	Amount	Remark
A	Opening GFA	6,045.02	Table 2.34
B	Net Additions to Asset during the year	515.00	Table 2.33
C	Closing GFA	6,560.02	(A+B)
D	Average GFA	6,302.52	(A+C)/2
E	Less: Average Consumer Contribution	943.51	Table 2.35
F	Average GFA net of CC	5,359.01	(D-E)

G	Average rate of depreciation	4.98%	
H	Depreciation for the year	266.88	(F*G)
I	Opening Depreciation	2,073.76	
J	Closing Depreciation	2,340.63	(I+H)
K	Average Depreciation	2,207.19	(I+J)/2

Working Capital Requirement

The Petitioner has computed working capital requirement as per Regulation 84 (4) Delhi Electricity Regulatory Commission (Terms and Conditions for Determination of Tariff) Regulations, 2017. The relevant extract of the Regulation is as follows:

"84. The Commission shall calculate the Working Capital requirement for:
(4) Distribution Licensee as follows:
(i) Working capital for wheeling business of electricity shall consist of ARR for two months of Wheeling Charges.
(ii) Working Capital for Retail Supply business of electricity shall consist of:
(a) ARR for two months for retail supply business of electricity;
(b) Less: Net Power Purchase costs for one month;
(c) Less: Transmission charges for one month:"

Based on the above formula computation of working capital is given below:

Table 2.37: Computation of Change in Working Capital (Rs Cr)

Sl. No.	Particulars	Amount FY 20-21		Remark
A	Annual revenues requirement	8,510.37		Table 2.44
B	Receivables equivalent to 2 months ARR		1,418.39	A/12*2
C	Power Purchase expenses	6,361.61		Table 2.30
D	Add: 1/12th of power purchase expenses		530.13	C/12
E	Total working capital		888.26	B-E
F	Opening working capital (addition as per Table 4.50 Tariff Order July'19)		831.46	As per True up Petition FY 18-19 Table no 3.50 filed Annexure 3
G	Change in working capital		56.80	(E-F)

Means of Finance for Capitalization for FY 2020-21

The Petitioner has submitted that Regulation 63 of the Tariff Regulations, 2017, provided that for determination of Tariff, the debt-equity ratio for any project or scheme under commercial operation shall be considered as 70:30.

Table 2.38: Computation of Means of Finance (Rs Cr)

Sl. No.	Particulars	Amount	Remarks
A	Capitalization	515.00	Table 2.33
B	Less- Consumer Contribution Capitalized during the year	50.00	Table 2.33
C	Funding Requirement	465.00	(A-B)
D	Through- Debt @ 70%	325.50	C*70%
E	Through Equity @ 30%	139.50	C*30%

Regulated Rate Base

Regulations 65 to 71 of the Tariff Regulations, 2018 deals with the methodology for determination of Regulated Rate Base (RRB), Weighted Average Cost of Capital (WACC) and computation of Return on Capital Employed (ROCE).

Regulation 66 of the Tariff Regulations 2017 provided that *"The Regulated Rate Base (RRB) shall be used to calculate the total capital employed which shall include the Original Cost of Fixed Assets (OCFA) and Working Capital. Capital work in progress (CWIP) shall not form part of the RRB. Accumulated Depreciation, Consumer Contribution, Capital Subsidies / Grants shall be deducted in arriving at the RRB."*

Based on the approved capitalization and corresponding deprecation thereon, estimated consumer contribution and estimated working capital requirement as computed above, computation of Regulated Rate Base for FY 2020-21 is given below:

Table 2.39: Computation of Regulated Rate Base (Rs Cr)

Sl. No.	Particulars	Amount	Remarks
A	Opening Balance of OCFA	6,045.02	Table 2.34
B	Opening Balance of Accumulated Depreciation	2,073.76	Table 2.36
C	Opening Balance of Accumulated Consumer Contribution	918.51	Table 2.35
D	Opening balance of working capital	831.46	Table 2.37
E	**RRB – Opening**	3,884.22	(A-B-C+D)
F	Capitalization during the year	515.00	Table 2.33
G	Depreciation for the year (Including AAD)	266.88	Table 2.36
H	Consumer Contribution, Grants,	50.00	Table 2.33
I	Change in Working Capital	56.80	Table 2.37
J	**ΔAB (Change in Regulated Base)**	155.86	
K	**RRB – Closing**	4,025.54	
L	**RRB(i)**	**4,040.08**	

Computation of WACC

The Hon'ble Commission in its Business Plan Regulations, 2019 has approved Rate of Return on Equity computed at base rate of 14% on post-tax basis for wheeling business and base rate of 2% on post-tax basis for retail business.

Further, Based on the 6 months actual cost of debt for capex loans @ 8.68% & working capital rate of interest of 8.49%, the weighted average rate of interest on loans (Capex & working capital) has been considered @ 8.61% for FY 2020-21.

Considering the above cost of debt and rate of return on equity, weighted average cost of capital has been computed by considering the average actual equity and average actual debt (net of repayment) for FY 2020-21.

Table 2.40: Weighted Average Cost of Capital (WACC) sought for FY 2020-21

Sl. No.	Particulars	Amount	Remark
A	Equity	1,531.18	
B	Debt- Capex	1,620.64	
C	Debt- working capital	888.26	
D	Return on Equity	16%	

E	Normal Income Tax Rate	34.94%	
F	Grossed up Return on Equity	24.59%	
G	Rate of Interest	8.61%	Cost of Debt for Capex @ 8.68% & Working capital @ 8.49%
H	Weighted Average Cost of Capital	14.67%	

Considering the above computed WACC of 14.67% the Petitioner has computed ROCE for FY 20-21 as follows:

Table 2.41: Computation of Return on Capital Employed **(Rs Cr)**

Sl. No.	Particulars	Amount	Reference
A	RRB (i)	4,040.08	Table 2.39
B	WACC	14.67%	Table 2.40
C	**Return on Capital Employed**	**592.67**	(A*B)

Non-Tariff Income

The Petitioner has kept Non-tariff income for FY 2020-21 at the same level i.e. Rs 85.85 Cr , as offered for truing up for FY 2018-19 , in line with the methodology followed by the Honb'le Commission in past.

Table 2.42: Non-Tariff Income **(Rs Cr)**

Sl. No.	Particulars	FY 20-21
A	Non-Tariff Income/Interest on Security Deposit	85.85
B	Additional Open Access charges	
C	Total	

Computation of Carrying cost Rate

The Hon'ble Commission has approved Return on Equity in terms of Regulations 2(16) of the DERC (Terms and Conditions for Determination of Tariff) Regulations, 2017 for computation of weighted average rate of interest for funding of Regulatory Assets/ accumulated Revenue Gap through Debt and Equity shall be considered at 14% on pre-tax basis in its Business Plan Regulations, 2019.

Further, the rate of interest at 8.78% for FY 2020-21 for funding revenue gap has been considered.

Based on the above, the carrying cost rate for FY 2020-21 computed as follows.

Table 2.43: Computations of carrying cost (Rs Cr)

Sl. No.	Particulars	FY 2020-21
A	Rate of Return on Equity	14.00%
B	Rate of Interest on Loan	8.78%
C	Rate of Carrying Cost	10.35%

Computation of Aggregate Revenue Requirement

Based on the submission made above the total Aggregate Revenue Requirement for the FY 2020-21 comes to Rs. 8,505.11 Cr. Component wise breakup of the same is given below:

Table 2.44: Summary of Aggregate Revenue Requirement (Rs Cr)

Sl. No.	Particular	FY 20-21 Amount	Remarks
A	Cost of Power Purchase	6,361.61	Table 2.30
B	O&M Expenses including Legal expenses	790.71	Table 2.31
C	Depreciation	266.88	Table 2.36
D	Return on Capital Employed	592.67	Table 2.41
E	Carrying Cost	584.35	Table 2.49
F	Less: Non-Tariff Income/ Interest on consumer security deposit	85.85	Table 2.42
H	**Annual Revenue Requirement**	**8,510.37**	

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Revised computation of Revenue (Gap)/surplus without carrying cost & DRS for FY 2020-21

Based on the above submission, the Petitioner has estimated Revenue Gap of Rs. 1275.76 Cr for FY 2020-21.

Table 2.45: Computations of Revenue (Gap) for the year without carrying Cost (Rs. Cr)

Sl. No.	Particular	FY 2020-21 Estimated	Remarks
A	Aggregate Revenue Requirement for the year without carrying cost	7,926.02	Table 2.44
B	Revenue available for the year without DRS	6,598.07	Table 2.16
C	Revenue (Gap)/surplus for the year	(1,327.95)	(B-A)

Computation of Additional Revenue Gap for FY 2019-20 to compute the Opening Revenue Gap for FY 2020-21

The Petitioner has submitted provisionally computed closing revenue gap of Rs. (3,655.84) Cr upto FY 2018-19 in true up Petition for FY 2018-19. However for the purpose of computation of carrying cost for FY 2020-21 (i.e. component of Aggregate Revenue Requirement), the opening revenue gap for FY 2020-21 is required to be computed.

Thus, for this purpose, the Petitioner considers the estimated revenue surplus of Rs 38 Cr as computed by the Hon'ble Commission for FY 2019-20 and further adjusted the said revenue gap/surplus on account of following variations/ reasons.

Computation of Additional Revenue Gap for FY 2019-20 is given below:

Table 2.46: Additional Revenue Gap for FY 19-20

Sl. No.	Particular	FY 19-20 Amount as approved * Rs Cr.	Remarks
	Total approved ARR for FY 2019-20	6950	Table 5.9 of TO 2019-20
	Estimated Revenue available for FY 2019-20	6989	
	Revenue (Gap)/Surplus*	**38**	
	Adjusted on account of		
	Power Purchase Cost (Note No 1)	(848)	Due to Arrears bills + REC impact etc.
	O&M Expenses (Note no 2)	(75)	Balance 10% of normative O&M expenses not factored at the time of issuance of TO 2019-20
	Additional O&M expenses (Note No 3)	(100)	
	Additional Impact on ROCE	0	Kept at same level, as issue is challenged before APTEL
	Carrying Cost Impact (Note No 4)	**(343.25)**	
	Revised Revenue Gap / surplus for the year^	**(1328.25)**	

** Approved in Tariff Order for FY 2019-20*

^ Estimated Figures and subject to change at the time of True up

Note No 1: Power Purchase Cost

The Hon'ble Commission in its Tariff Order for FY 2019-20 has projected gross power purchase cost/unit @ Rs. 5.53. {i.e. (Rs Cr - 5619+91)/10321 MUs}. Against the same, based on 8 months actual power purchase cost of Rs 5.93/unit, it is estimated that for FY 2019-20, Gross Power Purchase Cost/unit would be approx. @ Rs. 6.75/unit. Thus, resulting into increase in power purchase cost of the petitioner for FY 2019-20.

Computation of additional impact on Revenue Gap due to increase in Power purchase cost is given in table below:

Table 2.47: Additional Revenue Gap due to Power Purchase

Sl. No.	Particular	FY 19-20 Amount as approved* Rs Cr.	Remarks
A	Estimated Energy Input at Delhi Periphery (MU)	10321	Table 5.9 of TO 2019-20
B	Gross Power Purchase Cost/ units – Rs/kWh	5.53	
C	**Revised Estimated Power Purchse Cost/unit – Rs /Kwh**	**6.75**	
D	**Additional Impact of increase in cost – Rs Cr**	1259	

E	Less- Additionally Recovery of increased power purchase cost through PPAC – Rs Cr.	411	
F	Estimated amount unrecovered for FY 2019-20 – Rs Cr	848	
G	**Reason for Increase (Cost to be factored in Q4)**		
H	Arrear bill of PGCIL received in Jan 20 – POC 3	100	
I	Arrear bills of PPCL Bawana – Truing up order passed by CERC	251	Rs 83.63 Cr * 3
J	Arrears bills of IPGCL – Rajghat & GT	42	
K	Transmission charges – Other STOA Charges	89	
L	Impact of RE certificates for (1087 MUs)	243	Difference of floor price of rs 1000/Mwh versus market price of 3000/Mwh RE certificates (GST extra)
M	Arrear - MPL/SJVNL/NHPC	123	
N	**Total**	**848**	

Note No 2: Normative O&M Expenses

The Hon'ble Commission in its Tariff Order for FY 2019-20 has provisionally allowed an amount of Rs 672 Cr against the total normative O&M allowance of Rs 747 Cr. (i.e. provisional basis 90% of O&M expenses are considered). Relevant extract of the Tariff Order is given below:

"4.115 The Commission observed that the Petitioner has projected the network capacity on higher side. The Commission has provisionally allowed 90% of O&M expenses determined based on the network capacity projected by the Petitioner. The true up of O&M expenses shall be as actual network capacity."

Thus, for the purpose of computation of additional impact the said balance of 10% of O&M expenses of Rs 75 Cr (i.e. Rs. 747 Cr- Rs. 672 Cr) is considered additionally.

Note No 3: Additional O&M expenses

The Petitioner in its True up Petition for FY 2018-19 has sought additional O&M expenses of Rs. 115 Cr over and above the normative O&M expenses. The Hon'ble Commission has allowed Rs 20 Cr towards additional O&M expenses for FY 2019-20. Thus, the petitioner now considered additional impact of Rs. 100 Cr. for FY 2019-20 towards O&M expenses to meet its liability of statutory nature/ change in law etc.

Note No 4: Carrying Cost Impact

The Hon'ble Commission in its Tariff Order for FY 2019-20 has computed carrying cost of Rs 103 Cr. in Table no 4.61, considering average revenue gap of Rs 997 Cr. However, against the same, the Petitioner has computed carrying cost of Rs 343.25 Cr. for FY 2019-20. Computation of the same is given below:

Table 2.48: Additional Carrying cost for FY 19-20

Sl. No.	Particular	FY 19-20 Amount as approved Rs Cr.	Remarks
A	**Opening Revenue Gap as per true up Petition for FY 2018-19**	(3655.84)	As per True up Petition FY 18-19 Table no 3.67 file Annexure 4
B	Addition for the year	(1328.25)	As computed above
C	Closing Revenue Gap	(4984.09)	(A+B)
D	Average Revenue Gap	(4319.97)	(A+C)/2
E	Carrying cost @ 10.33%	(446.25)	
F	Less- already considered by the Hon'ble Commission	103.00	Tariff Order July'19
G	Additional impact	(343.25)	(E-F)

Computation of Closing Revenue Gap (on Provisional basis) along with Carrying Cost upto FY 2020-21

For the FY 2020-21, the Petitioner has estimated an amount of Rs 530.50 Cr towards 8% Deficit recovery surcharge and thereafter adjusted the said amount against the total of closing revenue gap for the year.

The summary of addition in opening Revenue Gap along with carrying cost (net of 8% Deficit Recovery Surcharge) is given below:

Table 2.49: Computations of Closing Revenue Gap **(Rs. Cr)**

Sl. No.	Particular	FY 2020-21 Estimated	Remarks
A	Opening Revenue Gap for FY 2019-20	(3,655.84)	Table 2.48
B	Additional impact for FY 2019-20	(1,328.25)	Table 2.46
C	Opening Revenue Gap for FY 2020-21	(4,984.09)	(A+B)
D	Revenue (Gap)/Surplus for the year	(1,327.95)	Table 2.45
E	Closing Revenue (Gap)	(6,312.04)	(C+D)
F	Carrying Cost Rate	10.35%	
G	Carrying Cost	(584.35)	(C+B/2)*F
H	Recovery of carrying cost from 8% Deficit Revenue Recovery Surcharge	530.50	Table 2.15
I	Closing Revenue Gap (including carrying cost)	(6,365.90)	(C+D++G-H)

COST OF SERVICE

The Petitioner has considered same approach for determining the cost of supply for different voltage levels as adopted by the Hon'ble Commission in its Tariff Orders.

The total ARR has been allocated in the Wheeling and Retail Supply business to different voltage levels and the same has been considered along with the energy sales to the respective voltage level to arrive at the per unit Wheeling charge and Retail Supply Charge for that voltage level.

ALLOCATION OF WHEELING ARR

The Petitioner has considered the gross energy sales (MU) for the FY 2020-21 and has allocated the same to different voltage levels in the proportion of energy sales (MU) to these voltages to total sales. The voltage wise estimated energy sales for FY 2020-21 is as shown in the following table:

Table 3.1: Estimated Energy Sales for FY 2020-21 (MU)

Particulars	MUs
Sales above 66 kV level	156.85
Sales at 33/66 kV level	33.92
Sales at 11 kV level	1,173.67
Sales at LT level	7,881.41
Total	**9,245.84**

The Petitioner has thereafter grossed up the energy sales (MU) at the specific voltage level with the respective distribution losses (%) at that level to arrive at the Energy Input (MU) for that level. The summary of the voltage wise distribution losses considered by the Commission are as follows:

Table 3.2: Estimated Distribution Loss for FY 2020-21 (%)

Particulars	%
Loss above 66 kV level	0.00%
Loss at 33/66 kV level	0.79%
Loss at 11 kV level	2.66%
Loss at LT level	8.80%

The Petitioner would like to mention that the voltage wise distribution losses considered above are estimates and based on same the Energy Input (MU) for the respective voltage levels are shown as follows:

Table 3.3: Estimated Energy Input for FY 2020-21 (MU)

Particulars	MUs
Input for 66 kV level	156.85
Input for 33/66 kV level	34.19
Input for 11 kV level	1,205.78
Input for LT level	8,642.08
Total	**10,038.90**

Based on the ratio given in Business Plan Regulations, 2019 Wheeling ARR for FY 2020-21 is computed as below:

Wheeling Business		Ratio	Amount in Rs Cr.
	Particulars		
A	O&M Expenses	62%	490.24
B	Depreciation	77%	205.50
C	ROCE	72%	426.72
D	Carrying cost @ 14%		81.81
E	Non-Tariff Income	40%	34.34
F	**Total Wheeling ARR**		**1,169.93**

The Wheeling ARR for the year has been apportioned in proportion of the energy input at different voltage levels. The wheeling cost allocated to different voltage levels is tabulated as follows:

Table 3.4: Wheeling cost for different voltages for FY 2020-21 (Rs. Crore)

Particulars	Amount
Above 66 kV level	18.28
At 33/66 kV level	3.98
At 11 kV level	140.52
At LT level	1,007.14
Total	**1,169.93**

Based on the energy sales at the respective voltage levels the Petitioner has determined Wheeling Charge per unit for different voltages for FY 2020-21 as follows:

Table 3.5: Wheeling Charges for FY 2020-21 (Rs/Unit)

Particulars	Rs-kWh Per unit
Above 66 kV level	1.17
At 33/66 kV level	1.17
At 11 kV level	1.20
At LT level	1.28
Average	1.27

ALLOCATION OF RETAIL SUPPLY ARR

Based on the ratio given in Business Plan Regulations, 2019 Wheeling ARR for FY 2020-21 is computed as below:

Retail Business		Ratio	Amount in Rs Cr.
	Expenditure		
A	Power Purchase Cost	100%	6,361.61
B	O&M Expenses	38%	300.47
C	Depreciation	23%	61.38
D	ROCE including Tax	28%	165.94
E	Carrying Cost	86%	502.54
F	NTI	60%	51.51
G	**Total Retail Business ARR**		**7,340.44**

The Petitioner has allocated the Retail Supply ARR in the ratio of energy input determined above for different voltage levels. The Petitioner has thereafter determined the Retail Supply charge for a particular voltage level by considering energy sales at that voltage level. The summary of Retail supply ARR Allocation to different voltage levels for FY 2020-21 is given as follows:

Table 3.6: Retail Supply cost for different voltages for FY 2020-21 (Rs. Crore)

Particulars	Amount
Above 66 kV level	114.69
At 33/66 kV level	25.00
At 11 kV level	881.67
At LT level	6,319.09
Total	**7,340.44**

Based on the energy sales at the respective voltage levels, the Petitioner has determined retail supply charges per unit for different voltages for FY 2020-21 as follows:

Table 3.7: Retail Supply Charges at different voltages for FY 2020-21 (Rs/Unit)

Particulars	Rs-kWh/unit
Above 66 kV level	7.31
At 33/66 kV level	7.37
At 11 kV level	7.51
At LT level	8.02
Average	**7.94**

The cost of supply determined by the Commission for the different voltage levels is shown as follows:

Table 3.8: Tariff at different voltages for FY 2020-21 (Rs/Unit)

Particulars	Rs-kWh/unit
Above 66 kV level	8.48
At 33/66 kV level	8.55
At 11 kV level	8.71
At LT level	9.30
Average	**9.20**

Tariff Rationalization

Measures for Tariff Rationalization

At the outset, TPDDL wishes to clarify that while proposing tariff rationalization measures, the intention is not to earn net extra revenue in the process but to make structure simpler, balanced, Consumer friendly and more realistic.

TPDDL, would, therefore, request the Hon'ble Commission to determine Tariff structure in such a manner that the impact on the total revenue requirement merely on account of the rationalization is 'Nil', and allow such revenue to meet the approved expenditure of the Licensee.

TPDDL proposals on "Tariff Rationalization" are as follows:

1. Time Bound Recovery of Regulatory Assets / Revenue Gap

The Hon'ble Commission since its tariff order dated 13th July 2012 and till date has allowed for an additional surcharge of 8% **towards recovery of past accumulated deficit / regulatory assets.**

It is pertinent to mention that the said surcharge is not sufficient to ensure recovery of entire Revenue Gap in stipulated timeframe.

We would further like to draw your kind attention to the Judgment dated 11th Nov 2011 in OP No. 1 of 2011 of Hon'ble Appellate Tribunal for Electricity (APTEL) regarding *Tariff Revision (Suo-Moto action on the letter received from Ministry of Power)* where-in the Hon'ble APTEL has emphasized on timely recovery of regulatory assets.

The relevant observation of the Hon'ble Tribunal in the said matter is as under:

*"65 (iv)......... **The recovery of the Regulatory Asset should be time bound and within a period not exceeding three years** at the most and preferable within Control period. Carrying Cost of the Regulatory Asset should be allowed to utilities in the ARR of the year in which the Regulatory Assets are created to avoid problem of cash flow to the Distribution Licensee."*

The concern on creation of regulatory assets in future and the need for timely liquidation of the Regulatory has also been emphasized in the amendments to the National tariff Policy. The relevant extracts have been reproduced below:

"8.2.2 The facility of a regulatory asset has been adopted by some Regulatory Commissions in the past to limit tariff impact in a particular year. This should be done only as a very rare exception in case of natural calamity or force majeure conditions and subject to the following:
a. Under business as usual conditions, no creation of Regulatory Assets shall be allowed;

b. Recovery of outstanding Regulatory Assets along with carrying cost of Regulatory Assets should be time bound and within a period not exceeding seven years. The State Commission may specify the trajectory for the same."

It may be appreciated that the major part of the regulatory asset has been hovering on the petitioner for more than 7 years and recovery of the high accumulated gap continues to remain a concern for the financial health of the Petitioner, given that there is no clear roadmap stipulated for recovery of the same.

Credit rating agency ICRA in its last rating has also expressed his concerns on the liquidation prospects of regulatory assets. Even a one notch down in credit rating from existing level will impact our interest rate by around 70-90 basis points. Also, absence of clear cut roadmap for the liquidation of regulatory asset severely impacts the future lending rates. Therefore, an early amortization of such huge built up Revenue Gap would further help in sustenance of the current credit rating of the Petitioner, ultimately resulting into lower cost of debt and saving of the carrying cost in the benefit of the consumers.

The Hon'ble Commission is requested to give an amortization schedule with annual recovery of the accumulated Revenue Gap along with Carrying Costs.

2. Revised Power Purchase Cost Adjustment Charge (PPAC) Formula

The Petitioner once again would like to draw the attention of the Hon'ble Commission on existing Power Purchase Adjustment Charge (PPAC) Formula. It is worth to mention that the power purchase adjustment mechanism is to ensure that the impact of change in power purchase cost of the Distribution Companies is passed on to the consumers in a timely manner on a quarterly basis.

The main short comings of said PPAC Formula is that it factors only the variance in Long Term power purchase cost (Generation and Transmission) and not the variance in sale rate (which is also a part of power purchase cost) . Accordingly, the Hon'ble Commission is requested to incorporate the suggestion so that any gain/loss on account of sale of surplus power may also be allowed in a timely manner. The same will ensure timely recovery / adjustments on a quarterly basis and prevent doing the same at the end of the year at the time of true-ups which will result in savings of carrying cost burden on consumers.

It will also ensure that in the situation when the sale rate is more than the approved base cost, PPAC may not get computed/ may get nullified on account of increase in Fuel charges/ Transportation costs

To remove the above shortcoming, TPDDL in its previous year tariff Petitions has also suggested revised PPAC formula to the Hon'ble Commission. It is further submitted that the Hon'ble APTEL in its Judgment in Appeal no 177 & 178 of 2012 has directed the State Commission to consider the variation in sale price of surplus power in the PPA formula. Relevant extract of the same is given below:

"The Hon'ble Tribunal agreed with the prayer of the Appellant that Power sales constitute a major component of power purchase cost and the power purchase cost is trued up only after 2 years, putting additional burden on consumers by way of interest charges which have to be borne by the consumers additionally. The Hon'ble Tribunal agreed that any short term power purchase due to unforeseen outages would require prudence check. Keeping in view small amount of short term power procurement cost, the Hon'ble Commission may not include short term power procurement in PPCA.

However, the Hon'ble Tribunal also agreed that Sale of short term power is volatile and may vary from what has been considered in determining the net power

purchase cost in ARR. Therefore, State Commission should have considered the variation in sale price of surplus power in the PPCA formula."

The Hon'ble Commission in its previous Tariff Order dated September 2015 in para no 3.37 on page no 141 has mentioned that

"The observation of Hon'ble APTEL in Appeal 177 & 178 of 2012 regarding PPAC formula will be taken into consideration while formulating PPAC formula in next MYT Control period."

However, the same has yet not been considered by the Hon'ble Commission.

Based on the above facts, the Petitioner is once again reproducing the revised formulae for PPAC.

Proposed Formula for consideration is suggested as below:

$$\textbf{PPA for nth Qtr. (\%)} = \frac{A * C - B * F + + (D\text{-}E)}{\{Z * (1 - \text{Distribution Losses in } \%/100)\} * ABR}$$

Where,

A = *Total units procured in (n-1)th Qtr. (in kWh) from power stations having long term PPAs to be taken from the bills of Gencos issued to distribution licensees (No change from existing formula)*

B = *Proportionate bulk sale of power from Power stations having long term PPAs in (n-1)th Qtr. (in kWh) (No change from existing formula)*

= *Total bulk sale in (n-1)th Qtr. (in kWh) * A*

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Gross Power Purchase including short term power in (n-1)th Qtr. (in kWh)

Total bulk sale and gross power purchase in (n-1)th Qtr. to be taken from provisional accounts to be issued by SLDC by 10th of each month.

C = ***C*** *actual* – ***C*** *projected (Change from existing formula)*

C *actual* = *Actual average Power Purchase Cost (PPC) from power stations having long term PPAs in (n-1)th Qtr. excluding fixed cost of regulated stations (Rs./kWh).*

C *projected* = *Projected average Power Purchase Cost (PPC) from power stations having long term PPAs including new long term PPAs Added and excluding regulated stations / surrendered stations (Rs./kWh) (from tariff order) (Base Rate)*

Regulated/Added/Surrendered stations to be taken from SLDC/DERC. DISCOMs will provide audited figures for not paid stations.

D = *Actual Transmission Charges paid in the (n-1) th Qtr (no change)*

E = *Base Cost of Transmission Charges for (n-1) th Qtr= (Approved Transmission Charges/4) (no change)*

F *(new)* = *Actual average Power Sale Rate in the (n-1)th Qtr. (Rs./kWh) – Projected Average Sale Rate by DERC (from tariff order) (Change from existing formula).*

DISCOMs will provide duly audited average sale rate.

DISCOMs will provide duly audited figures.

Z = *[{Actual Power purchased from Central Generating Stations having long term PPA in (n-1)th Qtr. (in kWh) * (1 – PGCIL losses in %/100) + Power from Delhi Gencos including BTPS (in kWh)} * (1 - DTL losses in %/100) } – B] in kWh (No change from existing formula)*

Power from Delhi Gencos including BTPS to be taken from provisional accounts to be issued by SLDC by 10th of each month.

ABR *= Average Billing Rate for the year (to be taken from the Tariff Order)*

Distribution Losses (in %) *= Target Distribution Losses (from Tariff Order)*

PGCIL Losses (in %) *= 100 x Approved PGCIL losses in Tariff Order (kWh)*
Approved Long Term Power Purchase from
Central Generating Stations having long term
PPA in the Tariff Order (kWh)

DTL Losses (in %) *= 100 x Approved DTL Losses (from the Tariff Order)*
Power available at Delhi periphery
(from energy balance table-tariff order)

3. Upward revision in Credit Card / Debit Card Payment Limit

Recently, Ministry of Power, Govt. of India vide D.O. letter no. 1/10/2016-IT dated 09.12.2016 issued direction regarding digital cashless transaction in country. The clause (b) of MoP,Govt. of India in the said matter is as under:

b) All convenience fee/charges for digital payment should be waived from customer.

In view of above direction, Hon'ble Commission is requested that no processing fee should be charged from customer for payment through credit card / debit card irrespective of bill amount and same should be pass through in ARR on actual Basis.

4. Cash transaction for theft bills

The Hon'ble Commission has directed that the DISCOMs shall not accept payment from its consumers at its own collection centres/mobile vans in cash towards electricity bill exceeding Rs. 4000/- except from blind consumers and for court settlement cases or any other cases specifically no revenue collection above Rs.4,000/- should be collected through cash for theft charges.

In this regard, it is pertinent to mention that the Petitioner is facing certain problems in collection of theft bills in the mode other than cash. Following are some area of concerns which requires the immediate attention of the Hon'ble Commission in order to comply with the said directive:

a) Most of the theft cases are presently detected in JJ clusters and rural areas/villages where the consumers do not always have bank accounts to issue cheques.

b) Even if applied, acceptance of cheques itself poses problems of bounced cheques and further requirements of notices and litigation under Negotiable Instruments Act.

c) Recovery in theft cases is very difficult and there are frequent defaults. A very large number of consumers of JJ Clusters and villages seek installments for payments and there is lot of default and such consumers are less educated. Asking such persons to go to banks for preparation of drafts every month (due to installments) will be a strong dissuading factor and would involve inconvenience, extra formalities, delays and loss of work for such consumers.

d) Private banks do not issue drafts unless the applicant has an account with the bank and the public sector banks require PAN No. for transactions above Rs.50,000/-. The consumers of such areas would not be able to meet such requirements.

e) The Hon'ble Commission has issued the direction mainly due to an apprehension of cash collection without issuing receipts. The Petitioner follows a SAP based transparent

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process of recovery and unless a bill is issued, no payment can be accepted. Also, payment of only exact amount of the installment bill can be accepted and no one can make or accept any payment less or more than the amount of the bill. Therefore, there is absolutely no possibility of any collection without being accounted for in SAP or without issuing receipts. Both the activities of accounting for and issuing receipts are instant. Also, collections of theft bills are not carried out through any contractor or commission agent and all payments have to be made only at the collection counters of the company. The Petitioner further assures to the Hon'ble Commission that neither such transactions are carried out nor any such transactions is possible.

f) Even The Hon'ble Commission in past has considered and issued direction to DISCOMS vide letter No. F.3(427)/Tariff fin/DERC/2015-16/13784 dated 22/01/2016 to comply the direction issued by Hon'ble Special Electricity Court, Rohini in Case No. 652/14 dated 31/3/2015 to accept the cash payment towards theft Bill.

For the reasons cited above, the Hon'ble Commission may kindly exempt/exclude theft collections transactions from the said directive.

5. Penalty (ADSM – Additional Deviation Settlement Mechanism) on account of transmission line tripping

Under the Deviation Settlement Mechanism and Related Matters Regulations, 2014 effective from 17.02.2014, the Hon'ble CERC has assigned the responsibility of maintaining the grid discipline on the Buyers and Sellers only. It however needs to be noted that there are certain factors which are not under the control of the sellers/buyers but under the direct control of Transmission Utility and concerned Load Dispatch Centers. These mainly include tripping of transmission system and scheduling of power within four time block, which has considerable impact on execution of scheduling and dispatch plan set up by sellers/buyers. Tata Power DDL has filed a petition number 10 of 2014 with the Hon'ble Delhi Electricity Regulatory Commission (DERC) which also has details mentioned on the same including the issue of forced scheduling.

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A) Tripping of transmission lines:

As per the Deviation Settlement Mechanism (DSM) Regulations 2014, penalty is imposed on DISCOM if it under drawls at high grid frequencies (above 50.1 Hz). One of the reasons due to which the DISCOMs under draw is when a section of the load is disconnected due to tripping of transmission lines or power transformers maintained by Central Transmission Utility(CTU) or State Transmission Utility(STU) due to faults. Further, the problem is compounded by the fact that Delhi DISCOMs procure bulk of the power from generating stations situated outside Delhi, except for some distributed solar (less than 2 MW), and are thus completely dependent on the STU and CTU for delivery of power. Any subsequent corrective action to revise our schedule to the altered demand will take at least 4 time blocks.

The Hon'ble Commission may therefore appreciate that, unless intimated beforehand, the DISCOM/Buyer cannot account for these events in Scheduled planning. By their inherent nature, a tripping or fault cannot be predicted. Also as the fault has occurred in a system not maintained by the DISCOM/Buyer, the DISCOM/Buyer cannot take any action to reduce them by predictive or preventive maintenance. Therefore, any ADSM charges/penalty on account of the same should be made pass through in the ARR of the DISCOM and the DISCOM should not be held liable for any under-drawal on account of any unforeseen failure of a CTU or STU equipment, which resulted in such under-drawal and may be excluded from liability in case of such events. Alternatively the DSM penalty imposed upon Discoms on account of transmission line trippings be imposed upon the STU as DISCOMs have no direct control over issues related to transmission line/ equipment trippings.

B) Scheduling/revision of power in four time block

IEGC 2010 and subsequent amendments stipulates that the scheduling/revision of power should be executed in four time blocks. This timeline is adhered to incase when revision is within region however, the process takes approx. 6 time blocks or more in cases when seller and buyer are located in different region. Further, the scheduling of URS takes more than stipulated 4 time blocks as consent of multiple parties is involved in the same. The Petitioner in the past has already brought this to the notice of the Hon'ble Commission by filing of an affidavit.

These discrepancies between regulation and execution restrict the immaculate planning and execution required to meet such a stringent norm.

Hence, the Petitioner request the Hon'ble Commission to consider suspension of Additional Deviation Settlement Mechanism (ADSM), penalty applicable on DISCOMs for reasons beyond their control such as transmission outages/ scheduling errors of third parties such as SLDC and NRLDC. In the event, suspension of Additional Deviation Settlement Mechanism (ADSM) is not possible; the responsibility for penalty and revenue loss by DISCOMs on account of transmission constraints must be borne by the CTU/STU and not by Distribution Utilities.

6. Flat Tariff for Pre-Paid connections (Domestic Category)

Due to complex slab based tariff structure for domestic category and logics involved in billing of Pre-paid connections, the Hon'ble Commission may consider allowing separate tariff for billing of such prepaid consumers under domestic category.

7. Value Added Services on Paid Basis

The Petitioner would like to inform the Hon'ble Commission that based on our interaction with various institutional consumers and other consumers having multiple connections, TPDDL has been receiving from time to time the following requests

a. Sharing of load survey data,

b. Sharing of yearly account statement,

c. Tool for consumption analysis and helping in demand side management etc.

This is also pertinent to mention that many services of similar nature, offered by banks / financial institutes, like issuance of detailed account statement, duplicate statement etc. are on paid basis. Similarly, railways issue duplicate tickets on chargeable basis.

Considering the increasing consumer requirement for data stored in meter in form of load survey data, a consumer ledger providing detailed billing and payment history over a period time, it is requested to the Hon'ble Commission to allow the DISCOMs to initiate such value added services on paid basis.

8. Levy of Surcharge on all residential connections under temporary supply

In recent tariff orders issued by the Hon'ble Commission, surcharge on residential connection under temporary supply category has been removed in line with residential co-operative group housing connections. While the applicability of the same for residential co-operative group housing connections is understandable, however including "other" residential connections in this category may be avoided due to following reasons.

a) Apparently now, there is no motivation for residential consumers to switch from temporary to permanent connection as he is availing temporary connection at the same tariff.

b) Also it will create a lot of safety concerns, since, there is no standardization of cables used by consumers. Also, there is chance of theft by tapping the service cable used by consumer.

c) Further, there is a scope of misuse of existing permanent connection as consumer will not ask for temporary connection for construction of additional floor/units by consumer as there is no fear of any penalty etc. on account of misuse. *(being on same tariff)*

d) Temporary connection cannot be denied as per supply code, and there is possibility that consumer will use the same and will not go for permanent connection which is provided subject to feasibility.

e) Already domestic consumer is subsidized and excluding surcharge from long term temporary connection is like providing them double benefit.

f) Also, TPDDL procures long term power based on the demand of the existing consumers and for the temporary connections (based on load demanded), for which TPDDL has to make temporary arrangement in terms of procuring additional power on short term basis, which is at much higher rates as compared to long term power being procured on a regular basis.

Considering above points it is requested to allow levy of surcharge on all residential connections under temporary supply category.

9. Revised methodology for LPSC

It has been observed that few consumers are taking undue benefit of change in the methodology for calculation of LPSC on daily basis as well as regulation of 15 days' notice period before disconnection. Some frequently defaulting consumers has made the habit of paying the bill after due date but well before completing the 15 days of notice period as a result of which TPDDL is neither able to disconnect consumer supply nor able to charge full month LPSC. This is seriously hampering our efforts for reducing AT&C losses and is affecting honest paying Consumers. Further it is unnecessary increasing DISCOMs Operational expenditure for sending DN and Follow Up for payment. Therefore, the Petitioner requests to the Hon'ble Commission to modify guidelines as follows at least for High End Consumer with Load > 10 KW as amount involved is very high:

1. The Consumers who defaults the payment twice or more in last six month should not be given the additional notice period of 15 Days in case consumer default bills and the bill itself should be treated as disconnection Notice.

2. The Consumers who defaults the payment twice or more in last six month, Full Month LPSC should be levied on consumer in case of Default.

3. DISCOM should be given option of converting connection of Consumers from Postpaid to Prepaid, if Consumer Defaults more than 2 times in a Year.

The Petitioner requests to the Hon'ble Commission to implement above guidelines at least for High End Consumer, so that honest paying and Small Consumer are not affected due to malpractice of frequent Defaulters.

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10. RPO compliance

Open access consumers taking power from Renewable energy sources are exempted from payment of additional surcharge, wheeling charges and transmission charges. Accordingly these charges are paid by other Non-Open access consumers. As a compensation, the Hon'ble Commission may allow Renewable power beyond RPO of Open access consumers to be considered as part of DISCOM RPO compliance. This will help in reduction of purchase of RECs which in no way is adding to physical power but is only an expense on the Non open access consumers in the form of cost of Renewable Energy Certificates.

11. Short term transmission charges

With abolition of Short term transmission charges of CTU being a part of Draft CERC Sharing of Inter-State Transmission Charges and Losses 2019, once the same is implemented the Hon'ble Commission should put some mandatory interstate short term transmission charges to be paid by Open access consumers/ deemed licensees like Railways which otherwise will not pay any transmission charges as they do not have any Long Term Transmission (LTA). Accordingly their burden of transmission charges will have to be shared by Non Open access consumers for which LTA has been secured by a utility.

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Annual Revenue Requirement

All figures in Rs Crores

Sl. No	Particulars	EY (FY 20-21) Projection
1	**Power Purchase (MU) at TPDDL Periphery**	10,038.91
2	**Sale of Power (MU)**	9,245.84
3	**Distribution Loss %**	7.90%
3.1	**Distribution Loss in Mus**	793.07
3.2	**Intra State**	
3.3	**Inter State**	
1	**Receipts**	
a	Revenue from tariffs	
	i) Fixed Charges	
	ii) Energy Charges	
	iii) PPAC	
	iv) Surcharge for Regulatory Asset (8%)	
	v) Electricity Duty	
	v) Any Other Receipt	
b	Revenue subsidy from Govt.	7,128.57
	Total	**7,128.57**
2	**Expenditure**	
a	Purchase of Power from Long Term Sources	
b	Purchase of Power from Other than Long Term Sources	
c	Transmission Charges	
	i) Intra State	
	ii) Inter State	
d	Load Despatch Charges	6,361.61
e	O&M Expenses	
	i) R&M Expense	
	ii) Employee Expenses	
	iii) A&G Expense	
	iv) Statutory Levies, Change in Taxes, etc.	790.71
f	Depreciation	266.88
g	Carrying Cost	584.35
h	Finance Charges	
i	**Less:** Interest capitalised	
j	**Less:** Finance charges capitalised	
k	**Less:** O&M capitalised	
l	Extraordinary Items	
m	Other - Loss on Retirement-/ (charges)	
	Total	8,003.55
3	**Return as approved/ allowed by Commission (ROCE)**	592.67
4	**Non Tariff Income**	85.85
5	**Annual Revenue Requirement (2)+(3)-(4)**	8,510.37

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6	**Additional Impact on account of Deficit in Pension Trust**	
7	**Surplus(+) / Shortfall(-) : (1)-(5)+(6) before tariff revision**	(1,381.80)
8	**Tariff Revision - Impact**	
8	**Surplus(+) / Shortfall(-) : (6)-(7) after tariff revision**	

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Income from investments and Non-Tariff Income

Form No: F4

Figure in Rs Crore

Sl. No	Particulars	FY (2020-21) Projection
A	**Non Tariff Income**	Based on NTI offered for Trued up for FY 2018-19
	Late Payment Surcharge Collected	
	Less- LPSC financing Cost	
	Service Line Charges	
	Maintenance Charges	
	Less- Incentive On Street Light Maintenance	
	Commission on DVB arrears	
	Commission on Energy Tax Collection	
	Miscellaneous Operating Income	
	Other Non-operating Income	
	Interest on Consumer Security Deposit	
	Open Access Charges	
	Sub-Total	
B	**Other Business Income (Net)**	
	Sub-Total	
	Total	**85.85**

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Repair & Maintenance Expenditure

Form No: F5

Figure in Rs Crore

<table>
<tr><th rowspan="2">Sl.No.</th><th rowspan="2">Particulars</th><th>EY (2020-21)</th></tr>
<tr><th>Projection</th></tr>
<tr><td></td><td></td><td></td></tr>
<tr><td>1</td><td>Sub-Station</td><td rowspan="13">As per MYT Regulations 2019, R&M Expenses are allowed as a part of O&M expenses, hence separate figures are not given</td></tr>
<tr><td></td><td>i) Owned</td></tr>
<tr><td></td><td>ii) Outsourced</td></tr>
<tr><td>2</td><td>Transformer other than installed in Sub Station</td></tr>
<tr><td>3</td><td>Building</td></tr>
<tr><td>4</td><td>Civil Works</td></tr>
<tr><td>5</td><td>Others Works</td></tr>
<tr><td>6</td><td>Lines, Cables Net Works etc.</td></tr>
<tr><td>7</td><td>Vehicles</td></tr>
<tr><td>8</td><td>Furniture and Fixtures</td></tr>
<tr><td>9</td><td>Office Equipments</td></tr>
<tr><td>10</td><td>Spare Inventory for maintaining Transformer redundancy</td></tr>
<tr><td>11</td><td>Sub station maintenance by private agencies</td></tr>
<tr><td></td><td>Total</td><td></td></tr>
</table>

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Employee Cost and Provisions **Form No: F6**

Figure in Rs Crore

Particulars			EY (2020-21)
			Projection
		Employee's Cost	
	1	Salaries	**As per MYT Regulations 2019, Employee Expenses are allowed as a part of O&M expenses, hence separate figures are not given**
	2	Dearness Allowance	
	3	Other Allowances & Relief	
	a	Allowance details	
	b	...	
	c	....	
	d		
	4	Medical Expenses Reimbursement	
	5	Leave Travel Assistance	
	6	Fee & Honorarium	
	7	Incentives/Awards Including That In Partnership Project (Specify Items)	
	8	Earned Leave Encashment	
	9	Tution Fee Re-Imbursement	
	10	Leave Salary Contribution	
	11	Payment Under Workman'S Compensation And Gratuity	
	12	Subsidised Electricity To Employees	
	13	Staff Welfare Expenses	
C		**Apprentice And Other Training Expenses**	
D		**Payment/Contribution To PF Staff Pension And Gratuity**	
	1	Terminal Benefits	
		a) Provident Fund Contribution	
		b) Provision for PF Fund - Invested	
		Not Invested	
		c) Pension Payments	
		d) Gratuity Payment	
		e) Leave Encashment Payment	
	2	Any Other Items	
		Total D	
E		Bonus/Exgratia To Employees	
F		**Grand Total**	
G		Chargeable To Construction Works	
		Balance Item 'F' Apropriate For (F)-(G)*	
		Note: Inlcuding Interim impact of 7th Pay Commission	
		Relevant Indices Of Wages Increase (As At The Beginning & End Of The Year)	
		WPI	
		CPI	
		D.A Rate	

NEW DELHI

TATA Power Delhi Distribution Limited

Adminstration & General Expenses

Form No: F7

In Rs Crore

S.No.	Particulars	EY (2020-21) Projection
A)	**Administration Expenses**	
1	Rent rates and taxes (Other than all taxes on income and profit)	As per MYT Regulations 2019, Employee Expenses are allowed as a part of O&M expenses, hence separate figures are not given
2	Insurance of employees, assets, legal liability	
3	Revenue Stamp Expenses Account	
4	Telephone,Postage,Telegram, Internet Charges	
5	Incentive & Award To Employees/Outsiders	
6	Consultancy Charges	
7	Technical Fees	
8	Other Professional Charges	
9	Conveyance And Travel (vehicle hiring, running)	
10	DERC License fee	
11	Plant And Machinery	
12	Security / Service Charges Paid To Outside Agencies	
13	Regulatory Expenses	
14	Ombudsman Expenses	
15	Consumer Forum	
	Sub-Total of Administrative Expenses	
B)	**Other Charges**	
1	Fee And Subscriptions Books And Periodicals	
2	Printing And Stationery	
3	Advertisement Expenses (Other Than Purchase Related) Exhibition & Demo.	
4	Contributions/Donations To Outside Institute / Association	
5	Electricity Charges To Offices	
6	Water Charges	
7	Public Interraction Program	
8	Any Other expenses	
	Sub-Total of other charges	
C)	**Legal Charges**	
D)	**Auditor'S Fee**	
E)	**Frieght - Material Related Expenses**	
F)	**Departmental Charges**	
G)	**Total Charges net of Provision for Contingency**	
	Note : Provision for Contingencies is related to Generation Business hence excluded	
H)	**Return as approved/ allowed by Commission (ROCE)**	
I)	**Total Charges Chargeable to Revenue Expenses**	

Interest & Finance Charges

Form No: F10

			Particulars	Interest Rate	EY (2020-21) Projection
A	I		**Interest and Finance Charges on Long Term Loans / Credits from the FIs/banks/organisations approved by the State Government**		
			Total of I (Weighted average)		
	II		**Interest on Working Capital Loans Or Short Term Loans**		Interest on Capex Loans and Working Capital Loan is allowed as a part of ROCE, hence no separate figures are given
			Total of A : I + II		
B			**Other Interest & Finance Charges**		
		1	Cost of raising Finance & Bank Charges etc.		
		2	Interest on Security Deposit		
		3	Dividend on non-convertible cumulative redeemable preference shares		
		4	Other Interest		
			Total of B		
C			**Grand Total Of Interest & Finance Charges: A + B**		
D			**Less: Interest & Finance Charges Chargeble to Capital Account**		
E			**Net Total Of Interest & Finance Charges : For Revenue Account: C-D**		

TATA POWER DELHI DISTRIBUTION LTD. NEW DELHI

TATA POWER DELHI DISTRIBUTION LIMITED

Contributions towards Cost of Capital Assets

Form No: F 13

Figures In Rs Cr.

Sl No	Particulars	Balance at the beginning of the year	Previous Year			Current Year			Ensuing Year		
			Additions during the Year	Capitalized during the year	Balance at the end of the Year	Opening Balance	Capitalized during the year	Balance at the end of the Year	Opening Balance	Capitalized during the year	Balance at the end of the Year
1	Consumer Contribution Towards Cost Of Capital Assets	818.26		50.25	868.51	868.51	50.00	918.51	918.51	50.00	968.51
	Total	**818.26**	**-**	**50.25**	**868.51**	**868.51**	**50.00**	**918.51**	**918.51**	**50.00**	**968.51**
	Refer Note no 23 (a) for Capital Subsidies of Rs 110.47 Cr.										

TATA POWER DELHI DISTRIBUTION LTD. NEW DELHI

Allocation Statement - Revenue Requirement (for the year)

All figures in Rs Crores Form F17

Wheeling Business		EY (2020-21)
Particulars		Projection
	Expenditure	
A	Power Purchase Cost	-
B	O&M Expenses	490.24
C	Depreciation	205.50
D	ROCE	426.72
E	Carrying cost	81.81
F	NTI	34.34
G	**Total Wheeling Business ARR**	**1,169.93**

TATA POWER DELHI DISTRIBUTION LTD. NEW DELHI

Allocation Statement - Revenue Requirement (for the year)

All figures in Rs. Crore Form F18

Retail Business		EY(2020-21)
Particulars		Projection
	Expenditure	
A	Power Purchase Cost	6,361.61
B	O&M Expenses	300.47
C	Depreciation	61.38
D	ROCE inlcuding Tax	165.95
E	Carrying Cost	502.54
F	NTI	51.51
G	**Total Retail Business ARR**	**7,340.44**

TATA POWER DELHI DISTRIBUTION LTD. NEW DELHI

District-wise AT&C Losses

Form 21

<table>
<tr><th rowspan="2">Sl. No.</th><th rowspan="2">Particulars</th><th colspan="9">Projected- 2020-21</th></tr>
<tr><th>Energy Input (MU)</th><th>Energy Billed to the Consumers (MU)</th><th>Distribution Loss (MU)</th><th>Amount Billed (Rs Cr)</th><th>Average Billing Rate (Rs / Unit)</th><th>Amount Realized (Rs/Cr)</th><th>Average Realization rate (Rs / Unit)</th><th>Units Realized (MU)</th><th>AT&C Loss (%)</th></tr>
<tr><td>1</td><td>Badli</td><td rowspan="12">10038.91</td><td rowspan="12">9245.84</td><td rowspan="12">7.90%</td><td rowspan="12">6631.23</td><td rowspan="12">7.17</td><td rowspan="12">6598.07</td><td rowspan="12">7.17</td><td rowspan="12">9199.61</td><td rowspan="12">8.36%</td></tr>
<tr><td>2</td><td>Bawana</td></tr>
<tr><td>3</td><td>Civil Lines</td></tr>
<tr><td>4</td><td>Keshav Puram</td></tr>
<tr><td>5</td><td>Mangolpuri</td></tr>
<tr><td>6</td><td>Model Town</td></tr>
<tr><td>7</td><td>Moti Nagar</td></tr>
<tr><td>8</td><td>Narela</td></tr>
<tr><td>9</td><td>Pitam Pura</td></tr>
<tr><td>10</td><td>Rohini</td></tr>
<tr><td>11</td><td>Shakti Nagar</td></tr>
<tr><td>12</td><td>Shalimar Bagh</td></tr>
<tr><td></td><td></td><td>10038.91</td><td>9245.84</td><td>7.90%</td><td>6631.23</td><td>7.17</td><td>6598.07</td><td>7.17</td><td>9199.61</td><td>8.36%</td></tr>
</table>

TATA POWER DELHI DISTRIBUTION LTD. NEW DELHI

Projection of Sales, Customers & Connected load for metered consumers

Form No: F22

S. No	Category	EY (2020-21) Projection		
		Projection of Sales (MU)	Projection of no. of Consumers	Projection of Connected Load (MW)
1	Domestic			
1.1	Domestic			
1.1.1				
	0-200 Units	905	6,46,947	763
	201-400 Units	1,032	3,77,959	514
	401-800 Units	578	1,51,008	242
	801-1200 Units	74	13,471	23
	>1200 Units	17	1,863	3
1.1.2	Between 2 KW to 5 KW Connected Load			
	0-200 Units	83	39,987	132
	201-400 Units	269	57,600	188
	401-800 Units	372	67,958	226
	801-1200 Units	166	24,780	87
	>1200 Units	60	6,891	27
1.1.3	5 to 15 KW Load			
	0-200 Units	24	17,869	137
	201-400 Units	87	17,849	130
	401-800 Units	206	28,967	214
	801-1200 Units	163	18,581	141
	>1200 Units	218	17,361	147
1.1.3	15 to 25 KW Load			
	0-200 Units	0	178	3
	201-400 Units	1	134	2
	401-800 Units	4	413	7
	801-1200 Units	5	373	7
	>1200 Units	34	1,406	26
1.1.3	Above 25KW			
	0-200 Units	0	34	3
	201-400 Units	0	8	0
	401-800 Units	0	30	1
	801-1200 Units	1	39	1
	>1200 Units	87	686	59
1.2	Single Delivery Point on 11 KV CGHS	24	19	11
	Adjustment on account of Solar	-3		
1.4	DVB Staff	15	3,539	10
1.5	Misuse (Domestic)			
1.6	Theft (Domestic)	7		
ed/ allowed by	Non Domestic			
2.1	Upto 3kVA	199	1,65,948	288
2.2	Above 3kVA	1,392	70,485	1,058
2.3	Misuse (Non Domestic)			
2.4	Theft (Non Domestic)	1		
	Adjusted towards Solar	-36		-16
	Adjusted towards Open Access	-12		
3	Industrial	2,665	31,929	1,455
3.4	Misuse (Industrial)			
3.5	Theft (Industrial)	0		
	Adjusted towards Solar	-21		-11
	Adjusted towards Open Access	-11		
4	Agriculture			
4.1	Agriculture	21	4,264	31
4.2	Misuse (Agriculture)			
4.3	Theft (Agriculture)	0		

5	Mushroom Cultivation			
5.1	Mushroom Cultivation	0	9	0
5.2	Misuse (Mushroom Cultivation)			
5.3	Theft (Mushroom Cultivation)			
6	Public Utilities	583	5,949	189
	Adjusted towards Solar	-87		-25
7	Temporary Supply			
7.1	Domestic Connections including Group Hc	41	10,901	26
7.2	For threshers during the threshing season	24	6,373	15
8	Charging Station E Rikshaw	14	495	4
	Additional Untis	21	365	4
9	Advertisement and Hoardings	0	238	1
10	Self Consumption	23	365	32
11	Misuse	1	114	1
12	Prepaid			
	Domestic			
	Non Domestic			
13	Others			
14	TOTAL	9,246	17,93,386	6,154

TATA POWER DELHI DISTRIBUTION LTD. NEW DELHI

Revenue from Proposed Tariff & Charges for FY 20-21

Form F-23

S. No.	Category	Consumers (Nos.)	Connected Load (KW)	Sales (MU)	Fixed Charges (Rs/kW)*	Variable Charges (Rs/Kwh)*	Revenue from Fixed Charges (Rs. Crs.)	Revenue from Variable Charges (Rs. Crs.)	Total Revenue (Rs. Crs.)
		No.	MW	MU	Fixed Charges	Energy Charges	Rs, Cr.	Rs, Cr.	Rs, Cr.
1	Domestic								
1.1	Domestic								
1.1.1	Upto 2 KW Load				Rs. 20 / kW/ month				
	0-200 Units	646947	762.60	905.43	20.00	3.00	18.30	271.63	289.93
	201-400 Units	377959	513.83	1031.60	20.00	4.50	12.33	328.15	340.49
	401-800 Units	151008	241.75	577.64	20.00	6.50	5.80	205.57	211.38
	801-1200 Units	13471	23.06	74.14	20.00	7.00	0.55	30.41	30.96
	>1200 Units	1863	3.02	16.98	20.00	8.00	0.07	8.58	8.65
1.1.2	2 to 5 KW Load				Rs. 50 / kW/ month				
	0-200 Units	39987	131.88	83.35	50.00	3.00	7.91	25.01	32.92
	201-400 Units	57600	187.71	269.20	50.00	4.50	11.26	100.40	111.67
	401-800 Units	67958	226.04	371.71	50.00	6.50	13.56	151.91	165.47
	801-1200 Units	24780	87.29	165.51	50.00	7.00	5.24	74.87	80.11
	>1200 Units	6891	26.52	60.09	50.00	8.00	1.59	29.96	31.55
1.1.3	5 to 15 KW Load				Rs. 100 / kW/ month				
	0-200 Units	17869	137.14	24.43	100.00	3.00	16.46	7.33	23.79
	201-400 Units	17849	130.36	87.02	100.00	4.50	15.64	33.00	48.65
	401-800 Units	28967	213.74	205.58	100.00	6.50	25.65	95.39	121.04
	801-1200 Units	18581	141.20	163.12	100.00	7.00	16.94	81.50	98.44
	>1200 Units	17361	147.07	218.11	100.00	8.00	17.65	121.43	139.08
1.1.4	15 to 25 KW Load				Rs. 200 / kW/ month				
	0-200 Units	178	3.11	0.11	200.00	3.00	0.75	0.03	0.78
	201-400 Units	134	2.31	0.59	200.00	4.50	0.55	0.22	0.77
	401-800 Units	413	7.18	3.63	200.00	6.50	1.72	1.81	3.54
	801-1200 Units	373	6.53	4.88	200.00	7.00	1.57	2.74	4.31
	>1200 Units	1406	25.65	34.30	200.00	8.00	6.16	22.89	29.04
1.1.5	Above 25KW				Rs. 250 / kW/ month				
	0-200 Units	34	2.74	0.00	250.00	3.00	0.82	0.00	0.82
	201-400 Units	8	0.26	0.03	250.00	4.50	0.08	0.01	0.09
	401-800 Units	30	1.03	0.31	250.00	6.50	0.31	0.16	0.47
	801-1200 Units	39	1.35	0.54	250.00	7.00	0.41	0.31	0.71
	>1200 Units	686	58.70	87.06	250.00	8.00	17.61	67.43	85.04
				0.00					
1.2	Single Point Delivery Supply for GHS	19	10.91	23.58	150.00	4.50	1.96	3.96	5.92
	Adjustment on account of Solar			-3.00				-1.27	-1.27
				0.00					
	Enforcement -Domestic (See Note 3)			7.44		8.48	0.00	6.31	6.31
				0.00					
2	Non-Domestic								
2.1	Upto 3kVA	165948	288.46	198.87	250.00	6.00	86.54	119.33	205.87
2.2	Return as approved/ allowed by Con	70485	1,058.33	1392.09	250.00	8.50	317.50	1231.31	1548.80
	Peak Hours (ToD)								
	Off-Peak Hours (ToD)								
	Adjusted towards Solar		-16.00	-36.00				-38.88	-38.88
	Adjusted towards Open Access			-12.00				-12.96	-12.96
	Enforcement -Non-Domestic (See Note 3)			0.78		21.60	0.00	1.69	1.69
				0.00					
3	Industrial	31929	1,455.29	2664.66	250.00	7.75	436.59	2121.21	2557.80
	Peak Hours (ToD)						0.00		
	Off-Peak Hours (ToD)						0.00		
	Adjusted towards Solar		-10.67	-21.00				-10.43	-10.43
	Adjusted towards Open Access			-11.00				-19.91	-19.91
	Enforcement -Industrial (See Note 3)			0.33		18.96	0.00	0.63	0.63
				0.00					
4	Agriculture	4264	30.94	20.65	125.00	1.50	4.64	3.10	7.74
4.1	Peak Hours (ToD)								
4.2	Off-Peak Hours (ToD)								
	Enforcement -Agriculture (See Note 3)			0.04		15.48	0.00	0.06	0.06
				0.00					
5	Mushroom Cultivation	9	0.10	0.15	200.00	6.50	0.02	0.10	0.12
5.1	Peak Hours (ToD)								
5.2	Off-Peak Hours (ToD)								
	Enforcement -Mushroom Cultivation (See Note 3)								
				0.00					
6	Public Utilities	5949	188.72	583.01	250.00	6.25	56.62	388.14	444.76
6.1	Peak Hours (ToD)						0.00		
6.2	Off-Peak Hours (ToD)						0.00		
	Adjusted towards Solar		-25.00	-87.00			-7.50	-54.38	-61.88
	Adjusted towards Open Access			0.00				0.00	0.00
	Enforcement -Public Utilties (See Note 3)								
				0.00					
8	Advertisement & Hoardings	238	0.52	0.41	250.00	8.50	0.16	0.34	0.50
8.1	Peak Hours (ToD)								
8.2	Off-Peak Hours (ToD)								
	Enforcement -Advertisement & Hoardings (See Note 3)								
				0.00					
9	Temporary Supply								
9.1	Domestic Connections including Gro	10901	25.83	40.88	195.00	5.85	6.04	23.91	29.96
9.2	For threshers during the threshing s	6373	15.10	23.69	195.00	8.45	0.00	20.02	20.02
9.3	All other connections including construction projects								
10	Charging Stations for E-Rickshaw/ E-Vehicle on Single Delivery Point								
10.1	Supply at LT	495	3.68	14.26		4.50	0.00	6.42	6.42
10.1.1	Peak Hours (ToD)	0	-	0.00			0.00		
10.1.2	Off-Peak Hours (ToD)	0	-	0.00			0.00		
10.2.1	Supply at HT			0.00		4.00			
	Additional Untis	365	3.51	21.00		4.50	0.00	9.45	9.45
11	Own Consumption(See Note 4)						0.00	0.00	0.00
11	Own Consumption(See Note 4)	365	32.00	23.06			0.00	0.00	0.00
				0.00					
12	Staff	3539	9.67	15.00		3.44		5.16	5.16
				0.00					
13	MISUSE	114	0.91	0.93		16	1.41	1.49	2.91
				0.00					
14.1	Prepaid - Domestic (See Note 5)								
14.2	Prepaid - Non Domestic (See Note 5)								
15	Other Adjustments (See Note 6)								
16	Collection where Rate Category not found								
17	(-)Open Access Charges								
	Grand Total	**1793385.91**	**6,154.36**	**9246.19**			**1102.93**	**5465.56**	**6568.49**

NEW DELHI

Annexure 1

For the purposed of truing up of capitalization for FY 2018-19, the Hon'ble Commission has started exercise for physical verification of assets. It is expected that report for the said activities would be released is December. Hence, for the purpose of truing up submissions, Tata Power- DDL considers capitalization based on audited financial statements.

Based on above submissions, value of Gross Fixed Assets for FY 2018-19 has been computed as below:

Table 3.45: Detail of Actual Capitalization **(Rs. Cr)**

S No.	Particulars	Amount	Amount
A	Revised Provisional opening balance of Gross Fixed Assets (net of Retirement)	5074.48	Table 3.44(ii)
B	Add- Capitalization during the year	569.53	Table 3.44(i)
C	Less- Retirement/ De-capitalization for the year	78.99	Note 4.4 of the Audited Financial Statement
D	Closing balance of Gross Fixed Assets (net of Retirement)	5,565.02	(A+B-C)
E	Average Balance of Gross fixed Assets	5,319.75	(A+D)/2

Loss on Sale of Retirement of Assets/ De-capitalization of Assets

Regulation 45 to 47 of the Tariff Regulations, 2017 deals with the methodology of allowance of Loss or gain due to De-capitalization/Retirement of Fixed Assets. Relevant extract of the said Regulations are reproduced below:

"45. Loss or Gain due to de-capitalization of asset based on the directions of the Commission due to technological obsolescence, wear & tear etc. or due to change in law or force majeure, which cannot be re-used, shall be adjusted in the ARR of the Utility in the relevant year.

46. Loss or Gain due to de-capitalization of asset proposed by the Utility itself for the reasons not covered under Regulation 45 of these Regulations shall be to the account of the Utility.

47. Loss or Gain due to de-capitalization of asset after the completion of useful life of asset shall be to the account of the Utility."

It is worth to mention that as the capitalization is not trued up from FY 05-06 onwards, hence, exact computation of loss for retirement of assets is not possible. Therefore, the petitioner is requested to allow loss towards retired assets for an amount of Rs 27.90 Cr on provisional basis for FY 2018-19 based on the audited financial statement.

Consumer Contribution/Grant

Regulation 66 of the Tariff Regulations, 2017 stipulated that for the purpose of computation of Regulated Rate Base, consumer contribution corresponding to the amount of assets capitalized shall be deducted.

In Tariff Order FY 2019-20, the Hon'ble Commission had provisionally trued up an amount of Rs. 818.26 Cr. towards consumer contribution & capital grant at the end of FY 2017-18. During the FY 2018-19, Tata Power- DDL has capitalized an amount of Rs 50.25 Cr. towards capitalization of Deposit work schemes.

Table 3.46: Consumer Contribution/grants (Rs. Cr)

S. No.	Particulars	Amount	Remark
A	Opening Balance ^	818.26	Table 3.74 of Tariff Order 2019-20
B	Total Addition during the year	50.25	Note 22(a)(b) of Audited Financial Statement
C	Closing Balance	868.51	(A+B)
D	Average Consumer Contribution	843.38	(A+C)/2

^ value of consumer contribution and grants are as per tariff order FY 2019-20 and subject to change correspondingly to the value of fixed assets, if the exercise of the physical verification for previous years are completed before issuance of Tariff Order against this tariff Petition.

Depreciation (net of consumer contribution)

Regulation 40(4) of the Tariff Regulations, 2017 specified that "Provisions related to Depreciation, Return on Equity and Interest on Loan shall not be applicable on such capital assets to the extent of financial support utilized through consumer contribution, deposit work and grant."

Based on above methodology, computation of working capital for FY 2018-19 is given in table below:

Table 3.50: Computation of working capital for FY 2018-19

S. No.	Particulars	Amount (Rs Cr)	Remark
A	ARR for Distribution business as a whole	7,556.11	Table 3.56
B	ARR equivalent to 2 months	1,259.35	(A/12*2)
C	Power Purchase expenses	5,758.68	Table 3.27
D	Less: 1/12th of power purchase expenses	479.89	(C/12*1)
E	Total working capital for the year	779.46	(B-D)

In Tariff Order FY 2019-20, the Hon'ble Commission had provisionally trued up an amount of Rs. 629.40 Cr. towards working capital at the end of FY 2017-18. Thus, the Petitioner in this petition has considered same value of working capital and compute the addition in working capital as per table given below.

Table 3.51: Computation of Change in working capital

S. No.	Particulars	Amount (Rs Cr)	Remark
A	Total working capital for the year	779.46	Table 3.50
B	Less- Opening Working Capital	629.40	Table 3.84 of Tariff Order FY 19-20
C	Working Capital for the year	150.06	(A-B)

Cost of Debt

For the purpose of truing up, the Petitioner submits the following cost of debt on actual basis.

S. No.	Particulars	Cost of Debt%
1	Cost of Debt for capex loan	8.48%
2	Cost of Debt for working capital	8.09%

Computation of Carrying Cost and Closing Revenue Gap

The Petitioner has considered the provisionally approved opening revenue gap of Rs. 2,254.50 Cr upto FY 2017-18 (which is subject to final true up) as per previous Tariff Order dated July, 2019 and further adjusted the said revenue gap with the additional Impact of Rs. 1180.48 Cr related to the various Judgment passed by Hon'ble ATE/ Hon'ble Commission.

Table 3.67: Computation of closing Revenue Gap for FY 2018-19 **(Rs. Cr)**

S. No	Particulars	Amount	Remarks
A	Opening Provisional trued up Revenue Gap	(2,254.50)	Table 5.3 of Tariff Order FY 19-20
B	Additional Impact of Various Appeal 246 Rithala Order	(1180.48)	Table 2.8
C	Revised Opening Revenue Gap	(3434.98)	(A+B+C)
D	Add: Revenue Gap sought for the year	(362.93)	Table 3.61
E	Add: Rithala impact	(29.72)	Table 3.63
F	Carrying Cost Rate	10.15%	
G	Add: Carrying Cost	(368.50)	(D+(E/2))*F
H	Less- Realization from 8% Deficit recovery surcharge	540.29	Table 3.10
I	Closing Revenue Gap	(3,655.84)	(D+E+G-H)

The Petitioner has computed carrying cost @ 10.15% considering actual cost of debt, on the average balance of revenue gap for the year. During the FY 2018-19 the Petitioner has collected Rs 540.29 Cr towards 8% Deficit recovery surcharge and adjusted the said amount against the total of closing revenue gap of Rs. 3,655.84 Cr. In line with the Hon'ble Commission directions for adjusting the 8% DRS against the liquidation of Revenue Gap.