#### 1 EXECUTIVE SUMMERY

#### 1.1 Filing under Present Petition

- The Hon'ble Commission had issued MERC (Multi-Year Tariff Regulations), 2019 dated 1<sup>st</sup>
  August, 2019 (herein after referred to as "MYT Regulations, 2019") for the fourth MYT
  Control Period from FY 2020-21 to FY 2024-25.
- 2. The Hon'ble Commission in the MTR order in Case No. 225 of 2022 has granted liberty that Tata Power-D may file a revised petition for the 5th year i.e., for FY 2024-25, in accordance with the Regulation 5 of the MYT Regulations, 2019.
- 3. As per the Regulation 5 of the MYT Regulations 2019, the present petition has been filled by Tata Power-D for Truing up for FY 2022-23, Provisional Truing-up of ARR for FY 2023-24 and approval of Revised ARR, expected revenue from existing Tariff and charges, expected revenue gap/(surplus) and proposed category-wise Tariff for FY 2024-25 as per MYT Regulations, 2019.
- 4. In the present petition, the detailed submission of the actual performance of FY 2022-23 in comparison with the approved parameters issued by this Hon'ble Commission in MTR order in Case No. 225 of 2022, dated 31st March, 2023. The said detailed have been presented in Section 2 of the present Petition. Further, the detailed submissions for the Performance Review for FY 2023-24 in comparison with the approved parameters by this Hon'ble Commission in Case No. 326 of 2019, dated 30<sup>th</sup> March, 2020 have been presented in Section 3. The projections of ARR for FY 2024-25 have been presented in Section 4. The detailed submissions regarding recovery of past period and Tariff philosophy and proposal are presented in Section 5. The prayers before this Hon'ble Commission are set out in Section 8.

- 5. Tata Power-D has given comparison for FY 2022-23 figures with MTR Tariff Order dated 31st March, 2023 as true up till FY 2022-23 has not been interfered with the Hon'ble APTEL in its Order dated 5th January, 2024 in Appeal no 369 of 2023. Further, the comparison for FY 2023-24 has been shown with MYT Tariff Order dated 30th March, 2020 as tariff presently being levied is as per this Order. For FY 2024-25, the comparison is shown with MTR Tariff Order dated 31st March, 2023 pending determination of the tariff for this year in present tariff proceedings. It is submitted that the comparisons are only for presentation purposes without prejudice to the rights of Tata Power-D available under any Law, Rules, Regulations or Orders in vogue.
- 6. Summary of submission has been presented below:
  - Truing up of FY 2022-23
- 7. This section discusses and presents the actual performance of FY 2022-23 for the Distribution Wires and Retail Supply Business of Tata Power-D taking into consideration the Maharashtra Electricity Regulatory Commission (Multi Year Tariff) Regulation, 2019 ("MYT Regulations, 2019"), Mid-term Review (MTR) Tariff Order for Tata Power-D dated 31st March, 2023 in Case No. 225 of 2022 and the principles laid down in various judgments.

#### 1.1.1 Number of Consumers

8. The details of the consumers of Tata Power-D for FY 2022-23 are tabulated below. The consumer base of FY 2021-22 has also been shown for reference.

Table 1-1: Number of Consumers (billed) as on 31st March, 2023

Nos.

		FY 2021-22					
Category	Direct Consumers	Changeover Consumers	Total	Direct Consumers	Changeover Consumers	Total	% Increase
No of Consumers	179303	562807	742098	207057	554881	761938	2.67%

9. As can be seen from the above Table, there was an overall increase of **2.67%** in the total number of consumers of Tata Power-D (Direct plus Change-over) in FY 2022-23 over the previous year.

### 1.1.2 Category-wise Sales

10. The actual category-wise sales for FY 2022-23 and a comparison with the approved energy sales for FY 2022-23 as per the MTR Order is provided in the Table below:

Table 1-2: Category wise Sales for FY 2022-23

Mus

Consumer Categories	Appro	ved in the MTI	R T.O.	Act	ual For FY 2022	17ius
	Direct	Change over	Total	Direct	Change over	Total
						MU's
EHT I: -Industry	550.00		550.00	796.88		796.88
HT I – Industry	946.61		946.61	958.84		958.84
EHT II: - Commercial	95.00		95.00	102.42		102.42
HT II – Commercial	387.76	0.23	387.99	363.24	0.21	363.45
HT III: HT-Group Housing Society	39.75		39.75	38.89		38.89
HT IV - Railways Metros & Monorails	106.67		106.67	101.88		101.88
HT IV - Railways (22/33 Kv)	90.35		90.35	82.67		82.67
EHT IV - Railways (Metro/Monorail)	16.32		16.32	19.20		19.20
HT V - Public Services	175.08		175.08	158.86		158.86
HT V (A): Public Service - Government	25.00		25.00	18.14		18.14
Hospitals & Educational Institutions						
EHT V (B): Public Service - Others	60.24		60.24	59.22		59.22
HT V (B): Public Service - Others	89.84		89.84	81.50		81.50
HT VI: Electric Vehicle Charging Stations	16.20		16.20	15.98		15.98
Sub-total	2,317.07	0.23	2,317.30	2,536.99	0.21	2,537.20
LT Category						
LT I - Residential (BPL)	-	-	-	-	-	-
LT I - Residential	605.10	1,435.16	2,040.26	569.49	1,449.90	2,019.40
0-100	151.96	530.39	682.35	155.85	583.65	739.50
101-300	183.96	605.96	789.92	173.09	602.10	775.20
301-500	82.42	183.76	266.18	69.50	161.85	231.35
501 and above	186.76	115.05	301.81	171.05	102.30	273.35
LT II - Commercial	543.33	102.79	646.12	480.91	103.78	584.69
LT II(A) - Commercial upto 20 kW	124.73	72.96	197.69	97.92	73.75	171.67
LT II(B) - Commercial 20 to 50 kW	81.33	13.09	94.42	72.36	13.56	85.92
LT II(C) - Commercial > 50 kW	337.27	16.74	354.01	310.63	16.47	327.10
LT III (A) - Industrial upto 20 kW	25.00	14.92	39.92	21.16	14.59	35.75
LT III (B) - Industrial > 20 kW	232.89	7.97	240.86	213.25	7.41	220.65
LT IV- Public Services	30.13	3.05	33.18	29.57	4.28	33.85
LT IV (A) - Publ Serv Govt Hosp&Edu Inst	5.68	1.46	7.14	4.66	1.82	6.48
LT IV (B) - Public Services Others	24.46	1.59	26.05	24.91	2.46	27.37
LT VI: Electric Vehicle Charging Stations	2.00	-	2.00	1.34	0.02	1.35
Sub-total Sub-total	1,438.46	1,563.89	3,002.35	1,315.71	1,579.98	2,895.70
			-			
15 day	8.31	3.63	11.94	10.86	3.17	14.03
Total	3,763.83	1,567.74	5,331.57	3,863.56	1,583.36	5,446.93

11. The total Sales for FY 2022-23 is **5446.93 MUs** which is same as provisionally approved in the MTR Order.

#### 1.2 Power Purchase Quantum and Cost for FY 2022-23

- 12. In this section, Tata Power-D has presented the actual power purchase for FY 2022-23.

  The energy requirement of Tata Power-D has been met through the following sources:
  - (i) Power Purchase from Tata Power-G
  - (ii) Power Purchase from Renewable Sources
  - (iii) Power Purchase from short term bilateral sources
- 13. The summary of the approved and actual Power Purchase Cost for Tata Power-D for FY 2022-23 is given in the Table below:

Table 1-3: Power Purchase Cost for FY 2022-23

Power Purchase for FY 2022-23	Approved in the MTR Tariff Order			Tata Power-D Actual		
Source	Mus	Rs/kWh	Rs Cr	Mus	Rs/kWh	Rs Cr
Power Purchase from Tata Power-G	3162.10	8.12	2566.13	3112.87	8.54	2658.61
RE Purchase	1135.19	3.35	380.65	1134.35	3.40	385.49
Bilateral & UI Purchase	1246.55	6.06	755.74	1392.04	5.67	788.65
OLA Sale	5.71	9.19	-5.24	-34.78	8.52	-29.64
MSLDC Charges	-	-	1.28			1.27
Standby Charges	0.86	-	100.40	1.25		100.85
Transmission Charges	-	-	259.13			260.02
Total Power Purchase cost	5539.16	7.33	4058.09	5605.73	7.43	4165.25

14. The total Power Purchase Cost for FY 2022-23 for Tata Power-D was **Rs. 4165.25 Crores**. We request the Hon'ble Commission to approve the same.

## 1.3 Capital Expenditure and Capitalisation

15. The Hon'ble Commission, in its MTR Tariff Order in Case No. 225 of 2022 dated 31<sup>st</sup> March 2023 had approved the capitalisation of Rs. 156.07 Crores for Distribution Wires Business

and Rs. 34.73 Crores for Retail Supply Business. Against this, the actual capitalisation for FY 2022-23 is Rs. 170.51 Crores for Distribution Wires Business and Rs. 22.29 Crores for Retail Supply Business. The actual capitalisation and capital expenditure for FY 2022-23 for Tata Power-D is presented in the Table below:

Table 1-4: Capitalisation for FY 2022-23

Rs Crores

	Distribution V	Vires Business	Retail Supply		
Particulars	Capital Expenditure	Capitalisation	Capital Expenditure	Capitalisation	
Approved in the MTR Tariff Order		156.07		34.73	
Non-DPR Schemes	9.74	16.83	1.77	1.39	
DPR Cases	137.67	153.68	22.79	20.90	
NDPR/DPR Ratio		11%		7%	
Total	147.41	170.51	24.56	22.29	

16. As can be seen from the above Table, the capitalisation of the DPR schemes for the entire Distribution Business is **Rs. 174.58** Crores and for Non-DPR schemes is **Rs. 18.21** Crores. The ratio of Non DPR to DPR is works out to **10.43%** which is lower than the limit of 20% of Non-DPR to DPR. In view of the above, we request the Hon'ble Commission to approve the actual capitalization of **Rs. 170.51** Crores and **Rs. 22.29** Crores for the Distribution Wires and Retail Supply Business respectively. The detailed scheme wise breakup of the actual capitalisation is given in the Form 4.2 of the MTR petition. We request the Hon'ble Commission to approve the same.

#### 1.4 Aggregate Revenue Requirement for FY 2022-23

17. Based on the above submission, the ARR for the Distribution Wires and Supply Business of Tata Power-D works out as follows:

Table 1-5: ARR for Distribution Wires and Supply Business for FY 2022-23

Rs Crores

Particulars	MTR Tariff	Tata Power-D
	Order	
Power Purchase Expenses including Standby Charges	3698.22	3803.12
Intra-State Transmission Charges	259.13	260.02
MSLDC Fees & Charges	100.74	102.12
O&M Expenses	245.48	253.62
Depreciation	160.38	158.95
Interest on Loan Capital	66.05	70.57
Interest on Working Capital	9.14	12.14
Interest on CSD	15.51	10.75
Provision for bad and doubtful debts	-1.74	-3.62
Contribution to contingency reserves	0.60	0.60
Others (DSM)	0.52	0.42
Total Revenue Expenditure	4554.03	4668.69
Add: Return on Equity Capital	138.13	152.76
Aggregate Revenue Requirement	4692.16	4821.45
Less: Non-Tariff Income	16.88	11.86
Less: Income from OA consumers	43.88	30.37
Aggregate Revenue Requirement	4631.40	4779.22

18. As seen from above Tables, the total Revenue Requirement for the year FY 2022-23 works out to **Rs. 4779.22 Crores.** 

#### 1.5 Revenue from Distribution Business of Tata Power-D for FY 2022-23

19. The Total revenue recovered by Tata Power-D during FY 2022-23 for Distribution Business is as presented below:

Table 1-6: Total Revenue for Distribution Wires and Retail Supply Business for FY 2022-23

Revenue	Approved in MTR Order	Total	Sale	ABR
	Rs. Crs	Rs. Crs	MU's	Rs./kWh
Revenue Supply Business	3531.70	3421.31	5446.93	6.28
Revenue Wheeling Charges	426.88	405.66	3863.56	1.05
Revenue Wheeling Ch. (OA)	21.14	24.27	232.33	1.04
Revenue from OA	22.74	6.11	232.33	0.26
Total	4002.46	3857.34		

20. As can be seen from the above Table, Tata Power-D has recovered the Revenue of Rs. 3421.31 Crores for Retail Supply Business and Rs. 405.66 Crores from Wheeling business during FY 2022-23 which has been used for determining Gap/(Surplus) of ARR of FY 2022-23. Tata Power-D has recovered a revenue of Rs. 6.11 Crores towards Cross Subsidy Surcharge (CSS) and Rs. 24.27 Crores towards wheeling charges from open access consumers. While computing the Gap/ (Surplus) the same has been considered as reduction in the total ARR.

#### 1.6 Revenue Gap / (Surplus) for FY 2022-23

21. Based on the above submissions, the combined Revenue Gap / (Surplus) of Tata Power-D for FY 2022-23 for the Distribution Wires & Retail Supply Business is as shown in the Tables below:

Table 1-7: Gap / (Surplus) for Distribution Business for FY 2022-23

Rs Crores

Particulars	MTR Tariff Order	Tata Power-D
Net Aggregate Revenue Requirment	4631.40	4779.22
Revenue from Distribution Wires+Retail Supply	3958.58	3826.97
Revenue Gap/(Surplus)	672.82	952.25

22. As can be seen from the above Table, the combined gap for Distribution Business is **Rs**952.25 Crores for FY 2022-23 as against the approved Gap of **Rs 672.82 Crores**.

- 23. We request the Hon'ble Commission to approve the gap of **Rs. 952.25 Crores** for the Distribution Business for FY 2022-23 which we have considered for calculating Cumulative Revenue Gap.
  - PROVISIONAL TRUING UP OF AGGREGATE REVENUE REQUIREMENT FOR FY
     2023-24
- 24. This section discusses and presents the provisional truing up of FY 2023-24 with respect to the Distribution Wires and Retail Supply Business of Tata Power-D. It is submitted that calculations presented in this section have been computed considering the MYT Regulations, 2019, MTR Order dated 31st March, 2023 passed in Case No. 225 of 2022 and principles laid down in various Judgements. Further, Tata Power-D has also considered the directions passed by Hon'ble ATE in Appeal No. 369 of 2023, which has been filed Tata power-D against the said MTR Order.
- 25. For provisional Truing-up of FY 2023-24, the actual values of power purchase and sales have been considered till September, 2023. Further, the revised provisional values have been compared with the expenditure considered by the Hon'ble Commission in its MTR Order.
- 26. Further, considering the actual sales from April, 2023 to September, 2023, Tata Power-D has estimated the sales for the balance period and arrived at the estimated total sales for FY 2023-24 as given in the Table below:

Table 1-8: Estimated Sale for FY 2023-24

Mus

Consumer Categories	Approve	d in the MY	T T.O.	Mus Estimated For FY 2023-24			
consumer categories	Direct	Change	Total	Direct	Change	Total	
		over			over		
EHV - Industry	214.59	0.00	214.59	863.92		863.92	
HT I – Industry	984.70	0.00	984.70	1028.86		1028.86	
EHV- Commercial	106.22	0.00	106.22	102.54		102.54	
HT II – Commercial	394.89	0.15	395.04	352.94	0.21	353.15	
HT III - Group Housing Society	13.23	0.00	13.23	57.56		57.56	
HT IV: HT - Mono/Metro/Railways	71.50	0.00	71.50	110.05		110.05	
HT IV - Railways (22/33 KV)	71.38	0.00	71.38	86.53		86.53	
HT IV - Railways (Metro & Monorail)	0.12	0.00	0.12	23.52		23.52	
HT V - Public Services	238.85	0.00	238.85	138.39		138.39	
HT V(A) - Publ Serv Govt Hosp&Edu Inst	14.49	0.00	14.49	19.70		19.70	
EHV - Public Services Others	224.26	0.00	224.36	59.47		59.47	
HT V(B) - Public Services Others	224.36	0.00	0.00	59.22		59.22	
HT VI: Electric Vehicle Charging Stations	0.00	0.00	0.00	21.45		21.45	
Sub-total	2023.98	0.16	2024.14	2675.72	0.21	2675.93	
LT Category							
LT I - Residential (BPL)							
LT I - Residential	705.65	1417.75	2123.40	655.61	1417.22	2072.83	
0-100	188.88	606.05	794.93	182.31	585.25	767.56	
101-300	205.96	577.40	783.36	199.07	591.61	790.68	
301-500	81.93	137.37	219.30	77.11	150.54	227.65	
501 and above	228.88	96.93	325.81	197.11	89.84	286.94	
LT II - Commercial	660.14	162.09	822.23	622.64	108.60	731.25	
LT II(A) - Commercial upto 20 kW	154.56	102.21	256.77	130.11	84.07	214.18	
LT II(B) - Commercial 20 to 50 kW	156.54	24.72	181.26	92.02	11.53	103.55	
LT II(C) - Commercial > 50 kW	349.04	35.16	384.20	400.51	13.00	413.51	
LT III (A) - Industrial upto 20 kW	19.55	5.65	25.20	21.93	15.30	37.23	
LT III (B) - Industrial > 20 kW	211.58	0.93	212.51	255.54	5.45	260.99	
LT IV – Public Services	34.29	9.69	43.98	40.97	6.83	47.80	
LT IV (A) - Publ Serv Govt Hosp&Edu Inst	33.76	0.00	33.76	3.59	3.28	6.87	
LT IV (B) - Public Services Others	0.53	9.69	10.22	37.38	3.56	40.94	
LT VI: Electric Vehicle Charging Stations	0.10	0.00	0.10	2.67	0.08	2.75	
Sub-total	1631.31	1596.11	3227.42	1599.36	1553.48	3152.85	
15 day				3.37	5.87	9.24	
Total	3655.30	1596.27	5251.56	4278.46	1559.56	5838.02	

27. As seen from the above Table, the estimated sales for FY 2023-24 is **5838.02 MUs** and the same has been considered for energy requirement of FY 2023-24.

#### 1.7 Power Purchase Quantum and Cost for FY 2023-2024

- 28. Tata Power-D has presented below the provisional power purchase requirement for FY 2023-24. The energy requirement of Tata Power-D for FY 2023-24 is being met from the following sources:
  - Power Purchase from Tata Power –G
  - Purchase from Renewable Sources
  - Short Term Bilateral Sources

#### 1.7.1 Total Cost of Power Purchase for FY 2023-24

29. Based on the above discussion, the provisional cost of Power Purchase for FY 2023-24 works out as given below:

Table 1-9: Provisional Power Purchase Cost for FY 2023-24

Power Purchase for FY 2023-24	Approved in the MYT Tariff Order			Tata Power-D Provisional Power Purchase Cost		
Source	Mus	Rs/kWh	Rs Cr	Mus	Rs/kWh	Rs Cr
Power Purchase from Tata Power-G	3788.23	4.66	1764.70	3045.38	6.33	1928.54
Non Solar RPO+Solar+REC	1044.71	3.46	361.88	1506.49	3.28	494.12
Bilateral + UI Purchase	625.80	3.56	222.69	1494.47	5.18	774.46
OLA Sale				-81.41	8.01	-65.18
MSLDC Charges	-	-	1.37			1.02
Standby Ch.for energy drawn			0	0.85		0.85
Fixed Standby Charges	-	-	99.19	0.00		60.39
Transmission Charges	-	-	258.90			277.00
Total Power Purchase cost	5458.74	4.96	2708.73	5965.79	5.82	3471.20

30. As seen from the above Table, the provisional power purchase cost for FY 2023-24 works out to **Rs. 3471.20 Crores.** 

#### 1.8 Capital Expenditure and Capitalisation

31. The Hon'ble Commission, in its MYT Tariff Order in Case 326 of 2019 dated 30<sup>th</sup> March, 2020 had approved the capitalisation of Rs. 87.96 Crores for Distribution Wires Business and Rs. 14.02 Crores for Retail Supply Business. Against this, the provisional capitalisation

for FY 2023-24 is estimated to be **Rs. 170.39 Crores** for Distribution Wires Business and **Rs. 37.00 Crores** for Retail Supply Business. The estimated capital expenditure and capitalisation for FY 2023-24 for Tata Power-D is presented in the Table below:

Table 1-10: Estimated Capitalisation for FY 2023-24

**Rs Crores** 

Particulars	Wire Business	Retail Supply
Approved in the MYT Tariff Order	87.96	14.02
Estimated capitalization	170.39	37.00

32. The detailed scheme wise breakup of the capitalisation is given in the Form 4.2 of the MYT petition. We request the Hon'ble Commission to approve the same.

#### 1.9 ARR for Distribution Business for FY 2023-24

33. Based on the above computation of the elements of ARR, the summary of the ARR and its comparison with that considered in the MYT Order is presented for the Distribution Wires and the Retail Supply Business in the Tables below:

Table 1-11: Provisional ARR for Distribution Wires and Supply Business for FY 2023-24

Rs Crores

Particulars Particulars	MYT Tariff	Tata Power-D
Particulars	Order	
Power Purchase Expenses including Standby Charges	2349.27	3132.79
Intra-State Transmission Charges	258.90	277.00
MSLDC Fees & Charges	1.37	1.02
Standby Charges	99.19	60.39
O&M Expenses	253.10	261.88
Depreciation	152.37	168.67
Interest on Loan Capital	65.15	68.62
Interest on Working Capital	21.38	16.13
Interest on Security Deposit	9.72	9.56
Provision for bad and doubtful debts	0.00	0.00
Contribution to contingency reserves	0.65	0.63
Others (DSM)	0.68	0.52
Total Revenue Expenditure	3211.78	3997.21
Add: Return on Equity Capital	170.47	145.90
Aggregate Revenue Requirement	3382.24	4143.11
Less: Non-Tariff Income	7.80	18.28
Less: Income from OA consumers	0.00	42.09
Aggregate Revenue Requirement	3374.44	4082.74

34. As seen from the above the combined ARR for Distribution Wires and Retail Supply Business for FY 2023-24 worked out as **Rs 4082.74 Crores**.

#### 1.10 Revenue for FY 2023-24

35. Tata Power-D has considered the actual Revenue recovered till September, 2023, in which the revenue collected from April 2023 to June 2023 is as per the tariff approved by the Hon'ble Commission in the Tata Power-D MTR order in Case No. 225 of 2022 dated 31st March 2022, and revenue from July 2023 to September 2023 is as per the tariff approved by the Hon'ble Commission in its order in the MYT Order in Case No. 326 of 2019 dated 30<sup>th</sup> March 2020. Further, the revenue for H2 of FY 2023-24 is estimated based on the Tariff approved by the Hon'ble Commission in its order in Case No. 326 of 2019 dated 30<sup>th</sup> March 2020. Based on the same, the total estimated revenue recovery during FY 2023-24 is as given in the Table below. In addition to the same Tata Power-D wish to submit that

as per the Hon'ble APTEL Order dated 5th January, 2023 Tata Power-D has submitting the interim / final tariff for FY 2023-24. We request the Hon'ble Commission to consider the impact of the same if any for the provisional truing up.

Table 1-12: Estimated Revenue Recovered for Distribution Business for FY 2023-24

Revenue Supply Business 3674.97
Revenue Wheeling Charges 435.78
Revenue from OA (Wheeling Ch.) 23.04
Revenue from OA (CSS) 19.05
Total 4152.84

36. As seen from the above the estimated total Revenue recovery will be **Rs 4152.84 Crores** during for FY 2023-24.

#### 1.11 Revenue Gap / (Surplus) for FY 2023-24

37. Considering the estimated Revenue for FY 2023-24, the Revenue Gap / (Surplus) for FY 2023-24 for the Distribution Wires and Supply Business, is as follows:

Table 1-13: Gap / (Surplus) for Distribution Business for FY 2023-24

Rs Crores

Particulars	MYT Tariff Order	Tata Power-D
Net Aggregate Revenue Requirment	3450.59	4082.74
Revenue from Distribution Wires+Retail Supply	3366.51	4110.74
Revenue Gap/(Surplus)	7.93	-28.01

38. As can be seen from the above Table, the estimated standalone Revenue surplus for Distribution Wires and Supply Business for FY 2023-24 is **Rs. (28.01) Crores.** We request the Hon'ble Commission to approve the same.

- AGGREGATE REVENUE REQUIRED FOR THE PERIOD FY 2024-25
- 39. This section discusses and presents the estimated ARR for the Period FY 2024-25 with respect to the Distribution Wires and Retail Supply Business of Tata Power-D. It is submitted that the ARR is computed in this section considering the Maharashtra Electricity Regulatory Commission (Multi Year Tariff) Regulations, 2019 ("MYT Regulations, 2019").

#### 1.12 Sales Projection

- 40. For estimating the demand of direct consumers of Tata Power-D for the period FY 2024-25, Tata Power-D has considered the following factors:
  - CAGR based on past trends
  - Latest Sales data upto FY 2022-23
  - Sales on OA and
  - Consumers switching over to other Distribution Licensee.
- 41. Accordingly, the sales estimation for i) Direct Sales ii) Changeover Sales for FY 2024-25 are works out as given in the table below:

Table 1-14: Sales estimation for FY 2024-25

MU's

Consumer Categories		MTR Order		Revised Petition			
ŭ	Direct	Changeover	Total	Direct	Changeover	Total	
EHV - Industry	665.50		665.50	936.27		936.27	
HT I – Industry	1043.63		1043.63	1099.13		1099.13	
EHV- Commercial	95.00		95.00	102.66		102.66	
HT II – Commercial	427.50	0.23	427.73	335.91	0.21	336.11	
HT III - Group Housing Society	48.09		48.09	85.20		85.20	
EHV - Railways Metros & Monorails	16.32		16.32	28.81		28.81	
22/33 KV	99.62		99.62	90.57		90.57	
HT VI - Public Services	188.26		188.26	127.70		127.70	
HT VI(A) - Publ Serv Govt Hosp&Edu	29.81		29.81	21.40		21.40	
EHV Public Services Others	60.24		60.24	59.72		59.72	
HT VI(B) - Public Services Others	98.21		98.21	46.58		46.58	
HT VIII - Electric Vehicle Charging Stn.	16.20		16.20	28.78		28.78	
HT Consumers Total	2600.12	0.23	2600.35	2835.04	0.21	2835.24	
LT Category							
LT I - Residential (BPL)							
LT I - Residential	728.52	1435.16	2163.68	754.92	1403.51	2158.43	
0-100	193.13	576.92	770.05	213.27	587.17	800.45	
101-300	216.91	597.78	814.69	228.95	586.27	815.22	
301-500	90.94	159.91	250.85	85.56	145.49	231.05	
501 and above	227.53	100.55	328.08	227.13	84.58	311.72	
LT II - Commercial	599.02	113.32	712.34	806.31	113.32	919.63	
LT II(A) - Commercial upto 20 kW	137.52	80.44	217.96	172.90	96.53	269.43	
LT II(B) - Commercial 20 to 50 kW	89.66	14.43	104.09	117.02	11.06	128.08	
LT II(C) - Commercial > 50 kW	371.84	18.45	390.29	516.39	11.57	527.96	
LT III - Industrial upto 20 kW	27.56	16.44	44.00	22.73	15.99	38.72	
LT IV - Industrial > 20 kW	256.76	8.78	265.54	306.23	4.42	310.65	
LT IX(A) - Publ Serv Govt Hosp&Edu Inst	6.51	1.77	8.28	2.76	6.56	9.32	
LT IX(B) - Public Services Others	26.31	1.59	27.90	56.10	5.33	61.43	
LT XI: Electric Vehicle Charging Stations	2.12	0.00	2.12	5.34	0.16	5.50	
LT CONSUMERS TOTAL MUs	1646.80	1577.07	3223.87	1954.39	1555.13	3509.52	
15 day							
Total	4246.91	1577.30	5824.21	4789.43	1555.34	6344.77	

#### 1.13 Power Purchase Plan

- 42. In this section, Tata Power –D has presented the total power purchase requirement for FY 2024-25 based on the above estimated energy input requirement. The energy input requirement is proposed to be met from the following sources:
  - a) Power Purchase from Tata Power –G
  - b) Power Purchase from Renewable Sources
  - c) Short Term Bilateral Sources
  - d) Bundled Power Supply
- 43. The summary of power purchase from various Sources for the FY 2024-25 is provided below:

#### 1.14 Total Cost of Power Purchase:

44. The total cost of Power Purchase for Tata Power-D for FY 2024-25 is shown in the Table below:

Table 1-15: Total Power Purchase Cost of Tata Power-D for the Period FY 2024-25

			FY 2024-25					
Particulars	MU	Rs./kWh	Rs Crores	MU	Rs./kWh	Rs Crores		
		MTR Orde	r		Petition			
Tata Power-G	3376.70	7.40	2498.63	2830.55	6.15	1741.80		
Non-Solar+ Solar Generation + REC	1333.24	3.22	429.30	1451.45	3.15	457.78		
Bilateral Power Purchase	1342.02	5.13	688.46	2310.13	5.07	1170.77		
Standby Charges	-	-	103.52			0.00		
Transmission Charges	-	-	329.57			329.57		
SLDC Charges	-	-	1.09			1.09		
Total	5959.03	6.69	4050.57	6592.13	5.61	3701.01		

45. As can be seen from the above table, the proposed average cost of power purchase for the Control Period for FY 2024-25 is **Rs. 5.61/kWh**.

#### 1.15 Capital Expenditure and Capitalisation

46. Tata Power-D, has revised the capitalisation based on the estimated CAPEX and Capitalisation plan for FY 2024-25. The same has been tabulated below:

Table 1-16: Capitalisation in Distribution Wires Business for FY2024-25

Rs Crores

Particulars	W	ire	Supply			
	FY 20	24-25	FY 20	24-25		
	MTR	Revised	MTR	Revised		
DPR	169.75	141.47	7.69	49.85		
Non-DPR	25.00	25.00		3.50		
Total Capitalization	194.75	166.47	7.69	53.35		

47. We request the Hon'ble Commission to approve the projected capitalisation.

## 1.16 Aggregate Revenue Requirement

48. The estimated ARR for the Distribution Wires and Retail Supply Business has been tabulated below:

Table 1-17: Estimated ARR for Distribution Wires Business for FY 2024-25

Rs Crores

Particulars	Wi	re
	MTR Order	Revised
O&M Expenses	141.13	144.42
Depreciation	156.24	154.48
Interest on Long Term Loans	58.74	61.40
Interest on Working Capital	12.36	12.78
Interest on consumer security deposit	0.00	0.00
Bad and Doubtful Debt	0.00	0.00
Total Annual Revenue Requirement	368.47	373.07
RoE	141.65	140.43
Aggregate Revenue Requirement	510.12	513.50
Less:		
Less: Non Tariff Income	6.24	6.24
Less: Income from OA wheeling charges	24.39	25.28
Total Annual Revenue Requirement	479.49	481.98

Table 1-18: Estimated ARR for Retail Supply Business for FY 2024-25

Rs Crores

Particulars	Sup	ply
	MTR Order	Revised
purchase expenses	3616.39	3370.35
O&M Expenses	129.80	132.82
Depreciation	23.88	25.71
Interest on Long Term Loans	2.83	5.26
Interest on Working Capital	5.04	13.13
Interest on consumer security deposit	26.30	20.27
Bad and Doubtful Debt	0.00	0.00
Contribution to Contingency Reserve	0.71	0.72
Intra-State Transmission Charges	329.57	329.57
MSLDC Fees & Charges	1.09	1.09
Standby Charges	103.52	0.00
DSM expenses	0.52	0.52
Total Annual Revenue Requirement	4239.64	3899.45
RoE	13.43	14.64
Aggregate Revenue Requirement	4253.08	3914.09
Less:		
Less: Non Tariff Income	13.57	13.57
Less: Income from CSS	39.18	32.44
Total Annual Revenue Requirement	4200.32	3868.08

## CUMULATIVE REVENUE GAP / (SURPLUS), TARIFF PHILOSOPHY AND CATEGORY WISE TARIFFS FOR FY 2024-25

49. The earlier sections discussed about the truing of FY 2022-23, provisional truing up of FY 2023-24 and the ARR for FY 2024-25. This section presents the cumulative Gap / (Surplus) arising out of the performance of the previous years i.e. the actual Truing Up for FY 2022-23 and provisional truing up for FY 2023-24, impact of past gap approved by the Hon'ble Commission in its MTR Tariff Order in Case No 225 of 2022 and subsequently the Tariff philosophy and the Tariff proposal for FY 2024-25.

# 1.17 Cumulative Gap / (Surplus) of Distribution Wires and Retail Supply Business along with Carrying Cost

50. Based on the above submissions, the total past Gap / (Surplus) which needs to be adjusted in future Tariff for Distribution Wire and retail supply business is as computed in the Table below:

Table 1-19 Cumulative Gap / (Surplus) of Distribution Wire & Supply Business

				Rs Crores
	Particulars	Wires	Supply	Total
1	Incremental Gap/(Surplus) - FY 2019-20	6.22	-100.45	-94.22
2	Gap/(Surplus) - FY 2020-21	126.33	-296.42	-170.09
3	Gap/(Surplus) - FY 2021-22	57.29	322.54	379.83
4	Gap/(Surplus) - FY 2022-23	8.06	664.77	672.82
5	Addition due to Past Gap/(Surplus) allowed	2.10	49.92	52.02
	through Review Orders			
6	Total Carrying Cost	44.08	19.36	63.44
7	Refund from TPC-G		-22.65	-22.65
8	Refund of RAC over-recovery	-19.59		-19.59
9 =1 to 8	Cumulative Revenue Gap/(Surplus) allowed	224.49	637.08	861.56
	in the MTR Tariff Order till FY 2022-23			
10	Incremental Gap / (Surplus) for FY 2022-23	34.78	244.64	279.43
11	Incremental Carrying Cost fro FY 2022-23	1.62	11.37	12.99
12=9+10+11	Cumulative Revenue Gap/(Surplus) till FY	260.89	893.09	1153.98
	2022-23 with incremental impact			
12	Incremental Gap / (Surplus) for FY 2023-24	25.64	-301.61	-275.97
13	Incremental Carrying Cost fro FY 2023-24	25.45	69.02	94.48
14=12+13	Total Past Recovery Upto FY 2023-24	311.99	660.50	972.49

51. Tata Power-D proposes to compute the wheeling charges considering the 50% of total past gap of wire business in FY 2024-25.

52. As can be seen from the above Table, the net Gap to be adjusted for the Distribution Wires Business in the Tariff of FY 2024-25 is **Rs. 311.99 Crores** out of which Tata Power-D has considered **Rs 155.99 Crores** whereas the net Gap to be recovered in the Tariff for the Retail Supply Business is **Rs. 660.50 Crores.** The total Gap to be recovered in tariff of FY 2024-25 is **Rs 972.49 Crores**. Considering the total ARR to be recovered for Wire and Supply Business and estimated sales for FY 2024-25. The Average Cost of Supply for Distribution Business is as given in the table below:

Table 1-20 ACoS to be recovered in the future tariff

Rs Crores

Sr. No.	Particulars	Wire Business	Supply Business	Total
		FY 2024-25	FY 2024-25	FY 2024-25
1	Opening Balance	311.99	660.50	972.49
2	Addition of revenue gap/(surplus) during	0.00	0.00	0.00
	year			
3	Recovery of revenue gap/(surplus) during	155.99	660.50	816.49
	year			
4=1+2-3	Closing Balance	155.99	0.00	155.99
5	Rate of Interest (%)	10.05%	10.05%	10.05%
6=avg(1,4)*5	Incremental Carrying cost	23.52	33.19	56.71
7	Standalone ARR	481.98	3868.08	4350.06
8	Past Gap Recovery	179.51	693.69	873.20
9=7+8	Total ARR to be recovered	661.49	4561.77	5223.26
10	Energy Sales (MU)			6344.77
11=9/10*10	ACOS (Rs/kWh)			8.23
12	ABR at existing tariff (Rs/kWh) with FAC			7.37
13=11-12	Revenue Gap per unit (Rs/kWh)			0.86
14=13/12	Tariff Hike Required			12%

53. As seen from the above total ARR to be recovered for FY 2024-25 is **Rs 5223.26 Crores** at Weighted average rate of **Rs 8.23 per kWh** as against Weighted average rate of existing tariff of Rs 7.37 /kWh ( Rs 6.41/kWh approved tariff in the MYT T.O. 326 of 2020 dated 30th March, 2020 and proposed FAC recovery). Considering the same the average tariff hike required to meet the ARR requirement is Rs 0.88/kWh which is increase of around 12% of the existing tariff.

#### 1.18 Cross Subsidy Structure

54. The category wise CS structure proposed by Tata Power-D is as given below:

Table 1-21: Category-wise Cross Subsidy for FY 2024-25

Percentage (%)

	Percentage (%			
	FY 2023-24	FY 2024-25		
Category	Approved in MYT Tariff Order	Projected		
HT CUSTOMERS				
EHV - Industry		82%		
HT I - Industry	107%	102%		
EHV- Commercial		87%		
HT II - Commercial	131%	108%		
HT III - Group Housing Society (Residential)	109%	109%		
HT V(A) - Railways				
HT IV – Railways/Metro/Mono 22/33 kV	116%	105%		
EHT IV - Railways/Metro/Mono 22/33 kV		92%		
HT VI - Public Services				
a) Govt. Edu. Inst. & Hospitals	122%	102%		
b) Others	119%	101%		
EHV-PWW		118%		
HT VIII - EV Charging Stations		103%		
HT total				
LT CUSTOMERS				
LT I (B) - Residential	82%	95%		
- S1 (0-100 units)				
- S2 (101-300 units)				
- S3 (> 301-500 Units)				
- S4 (Above 500 units (balance units)				
LT II - Commercial				
(A) - Upto 20 kW	101%	106%		
(B) - > 20 kW & < 50kW	121%	120%		
(C) - > 50kW	125%	120%		
LT III (A) - Industry < 20 kW	97%	98%		
LT III (B) - Industry > 20kW	115%	116%		
LT IX - Public Services				
a) Govt. Edu. Inst. & Hospitals	100%	102%		
b) Others	108%	107%		
EV Charging Stations				

## 1.19 Tariff Components

- 55. Based on the above, various Tariff components have been proposed as given below:
  - I. Fixed / Demand Charges

- 56. Tata Power-D has proposed a same demand Charges as approved by the Hon'ble Commission in its MTR Tariff Order in Case No 225 of 2022.
  - II. Energy Charges
- 57. Tata Power-D has determined the category-wise Energy Charges based on the cross subsidy structure proposed in the current tariff petition. Further, as approved by the Hon'ble Commission, all HT consumers will be billed in kVAh instead of kWh billing. Category wise tariff components has been given in the subsequent paragraphs.
  - III. Incentives Load Factor / Power Factor / Time-of-Day
  - a) Incentives Load Factor
- 58. Tata Power-D proposes the same Load Factor Incentive as approved by the Hon'ble Commission in its MTR Tariff Order.
  - b) Time of Day Charges
- 59. Tata Power- D proposes the same slot wise TOD as approved by the Hon'ble Commission in its MTR Tariff Order in Case No 225 of 2022.
  - c) PF Incentive / Penalty
- 60. It is proposed to continue the PF Incentive / Penalty for kWh Billing as approved in Case No. 225 of 2022.
  - d) Wheeling Charge
- 61. The Hon'ble Commission while approving the wheeling charges has considered the GFA in the ratio of 1:76:23 for EHT:HT:LT. This principle adopted for segregation of GFA ratio has been challenged by Tata Power-D in Appeal No 369 of 2023. Till such time Tata Power-

D has computed the wheeling charges based on the principle adopted by the Hon'ble Commission with the revised GFA ratio considering the assets added upto FY 2022-23 as it would reflect the correct asset classification, The proposed wheeling charges are as shown in the table below.

Table 1-22: Wheeling charges for FY 2024-25

	Level		% Wheeled	% Wheeled sales mix between HT & LT	GFA	Wheeling Cost segregatio n (as per % GFA)	for EHV	Wheeling Cost allocation for HT (Rs. Crore)	Wheeling Cost allocation for LT (Rs. Crore)	Total Wheeling Cost allocation (Rs. Crore)	Wheeling Charges allocation (Rs/kWh)	Wheeling Charges allocation (Rs/kVAh)
FY 2024-25												
1	EHV (110 kV)	1127	22%		1%	7	7			7	0.06	0.06
2	HT (33/22/11/6.6 kV)	1935	39%	50%	65%	446		222		222	1.15	1.12
3	LT	1954	39%	50%	34%	234		224	234	458	2.34	
	Total Sale	5017	100%	100%	100%	687	7	446	234	687	1.37	

- ii. Wheeling Losses for the Control Period
- 62. It is proposed to adopt the Wheeling Losses based on the Energy Balance of FY 2022-23 which is as shown in the Table below:

Table 1-23: Wheeling Losses for the FY 2024-25

Month	12 Mnth Rolling	LT Losses 12 Mnth	HT Losses 12 Mnth	
	Distribution Loss	Rolling	Rolling	
FY23	1.13%	2.22%	0.30%	

- iii. Cross Subsidy Surcharge for FY 2024-25
- 63. Tata Power-D has computed the Cross Subsidy Surcharge "CSS" based on the formula stipulated in the Tariff Policy, 2016 for determining CSS. The category wise CSS computed for FY 2024-25 is as given in the Table below:

Table 1-24: Proposed CSS for FY 2024-25 (Rs/kWh/kVAh as applicable)

Rs/kWh Rs/kVAh Approved ABR - T WAC of Power C/(1-L%) [C/(1-CSS Capping CSS to be CSS to be Purchase - C /100)+D+R] Computed Approved Approved HT Category FY 25 6.78 1.36 0.75 EHV - Industry 1.28 5.11 5.30 6.03 0.75 HT I - Industry 1.44 8.41 5.11 5.30 7.12 1.30 1.68 1.30 1.27 **EHV- Commercial** 1.29 7.20 5.11 5.30 6.03 1.16 1.44 1.16 1.15 HT II - Commercial 1.60 8.89 5.11 5.30 7.12 1.77 1.78 1.77 1.76 HT III - Group Housing Society (Residential) 0.94 9.01 5.11 5.30 7.12 1.89 1.80 1.80 1.77 HT IV - Railways, Metro & Mono 0.86 8.68 5.11 5.30 7.12 1.56 1.56 1.43 22/33 kV - 100kV 1.58 7.61 5.30 6.03 1.52 1.52 1.40 1.58 HT V - Public Services 1.66 8.43 5.11 5.30 7.12 1.31 1.69 1.31 1.23 a) Govt. Edu. Inst. & Hospitals 1.48 8.35 5.11 5.30 7.12 1.23 1.67 1.23 1.21 **EHV - Public Services Others** 1.25 9.75 5.11 5.30 6.03 3.72 1.95 1.95 1.91 HT VIII - EV Charging Stations 0.49 8.51 5.11 5.30 7.12 1.39 1.70 1.39 1.37 LT Category LT I - Residential (BPL) LT I – Residential 0.00 7.86 5.11 5.40 8.42 0.00 LT II - Commercial 0.31 8.76 5.40 0.34 0.34 (A) - Up to 20 kW 8.42 (B) - >20 kW & < 50 kW 1.88 9.91 5.11 5.40 1.49 1.98 1.49 1.49 8.42 (C) - >50 kW 1.84 9.91 5.11 5.40 8.42 1.49 1.98 1.49 1.49 LT III (A)- Industrial upto 20 kW 0.00 8.10 5.11 5.40 8.42 0.00 1.62 0.00 0.00 LT III (B) - Industrial > 20 kW 1.06 9.52 5.11 5.40 8.42 1.10 1.90 1.10 1.10 8.39 5.11 5.40 LT IX - Public Services 0.00 0.00 Government Hospitals & Educational Institutions 0.77 8.79 5.11 5.40 8.42 0.38 0.38 0.38 Public Services Others

- iv. Charges to Open Access Consumers for the Control Period
- 64. The Charges applicable to OA consumers based on the Distribution OA Regulations, 2016 and its subsequent Amendment in 2019 are as follows:
  - Wheeling Charges

- Cross Subsidy Surcharge
- Additional Surcharges
- Regulatory Asset Charges

#### 1.20 Revised Tariffs for the Control Period

65. In line with the submissions made above the Tariff applicable for FY 2024-25 is presented in the Tables below:

Table 1-25: Proposed Tariff from 1<sup>st</sup> April, 2024 to 31<sup>st</sup> March, 2025 (Rs/kWh/kVAh)

Category		Components of tariff						
	Fixed Charges	Demand Charges	Wheeling Charge	Energy Charges	CSS			
	Rs/Connection /month	Rs/KVA/Mon th	Rs /kVAh for HT and Rs/kWh for LT	Rs /kVAh for HT and Rs/kWh for LT	Rs /kVAh for HT and Rs/kWh for LT			
HT Category								
EHV - Industry		400	0.06	6.47	0.74			
HT I – Industry		400	1.12	6.24	1.27			
EHV- Commercial		400	0.06	6.10	1.15			
HT II – Commercial		400	1.12	5.75	1.76			
HT III - Group Housing Society		400	1.12	6.91	1.77			
HT IV: HT - Mono/Metro/Railways								
HT IV - Railways (22/33 KV)		400	1.12	5.37	1.43			
EHV IV - Railways (Metro & Monorail)		400	0.06	3.48	1.40			
HT V - Public Services								
HT V(A) - Publ Serv Govt Hosp&Edu Inst		400	1.12	4.30	1.23			
EHV - Public Services Others		400	0.06	4.28	1.21			
HT V(B) - Public Services Others		400	1.12	9.42	1.91			
HT VI: Electric Vehicle Charging Stations		80	1.12	7.28	1.37			
Sub-total Sub-total								
LT Category								
LT I A- Residential (BPL)								
LT IB - Residential					0.00			
0-100	90		2.34	4.96				
101-300	135		2.34	6.97				
301-500	135		2.34	8.40				
501 and above	160		2.34	7.94				
LT II - Commercial								
LT II(A) - Commercial upto 20 kW	475		2.34	6.08	0.34			
LT II(B) - Commercial 20 to 50 kW		400	2.34	5.63	1.49			
LT II(C) - Commercial > 50 kW		400	2.34	6.20	1.49			
LT III (A) - Industrial upto 20 kW	475		2.34	6.30	0.00			
LT III (B) - Industrial > 20 kW		400	2.34	6.27	1.10			
LT IV - Public Services								
LT IV(A) - Publ Serv Govt Hosp&Edu Inst	475		2.34	7.37	0.00			
LT IV(B) - Public Services Others	475		2.34	6.45	0.38			
LT VI: Electric Vehicle Charging Stations		80	2.34	4.07				

#### Note:

- FAC will be applicable to all consumers and will be charged over the above tariffs,
  on the basis of the FAC formula specified by the Hon'ble Commission and
  computed on a monthly basis.
- Additional Fixed Charge of Rs. 160 per month will be levied on residential consumers availing 3 phase supply. Additional Fixed Charge of Rs. 160 per 10 kW load or part thereof above 10 kW load shall also be payable.

## 1.21 Revised ABR for FY 2024-25

Based on the above, the revised ABR for FY 2024-25 is as given in the Table below:

Table 1-26: ABR proposed for FY 2024-25

Consumer Categories	Average Billing Rate
, and the second	Rs./kWh
HT Category	
EHV - Industry	6.78
HT I - Industry	8.41
EHV- Commercial	7.20
HT II - Commercial	8.89
HT III - Group Housing Society (Residential)	9.01
HT IV: HT - Mono/Metro/Railways	
HT IV - Railways (22/33 KV)	8.68
EHV IV - Railways (Metro & Monorail)	7.61
HT V - Public Services	
a) Govt. Edu. Inst. & Hospitals	8.43
b) Others	8.35
EHV - Public Services Others	9.75
HT VIII - EV Charging Stations	8.51
HT subtotal	7.93
LT Category	
LT I (A) - Residential (BPL)	0.00
LT I (B) - Residential	7.86
- S1 (0-100 units)	5.88
- S2 (101-300 units)	8.43
- S3 (> 301-500 Units)	9.91
- S4 (Above 500 units (balance units)	9.91
LT II - Commercial	9.58
(A) - Upto 20 kW	8.76
(B) - > 20 kW & < 50kW	9.91
(C) -> 50kW	9.91
LT III (A) - Industry < 20 kW	8.10
LT III (B) - Industry > 20kW	9.52
LT IV - Public Services	8.74
a) Govt. Edu. Inst. & Hospitals	8.39
b) Others	8.79
LT V - EV Charging Stations	8.19
LT subtotal	8.48
Total	8.23