



12th January 2024
CFI-LRA-LRA-RGWR-LETR-000892

To,
The Secretary,
Maharashtra Electricity Regulatory Commission
13th Floor, Centre No-1, World Trade Centre,
Cuffe Parade, Colaba
Mumbai 400 005

Dear Sir,

**Sub: Response to Data Gaps - on Tariff Petition filed by Tata Power -D
in Case No 237 of 2023**

Ref: i) TVS dated 4th January, 2024

This has reference to the TVS held in the Hon'ble Commission's office dated 4th January, 2023 in which certain queries were raised in case no 237 of 2023.

We are enclosing our response to part of the queries as **Appendix** to this submission.

We trust the same is in order.

Thanking you,

Yours faithfully,

-Sd/-

Pankaj Prakash
Head – Regulatory
Tata Power Company Limited

Data Gaps – Set 1 on MTR Petition 2023 of TPC-D – Part II

1. *14 O & M clarification for Access Charges from FY 2019-20 to FY 2022-23*

Response

Tata Power-D wish to submit that Access charges have been levied by MCGM based on its Notification issued in FY 2013. However, bills have been raised from FY 2019-20 onwards for the past period. Tata Power-D based on the bills received have been booked this amount year wise. The details of the same are as given below:

Table: Year wise Access Charges

Particulars	Rs Crores
FY 2019-20	1.71
FY 2020-21	5.10
FY 2021-22	4.81
FY 2022-23	4.74
Grand Total	16.36

Further, Tata Power-D wish to clarify that this amount was also part of actual O & M expenses for FY 2019-20 to FY 2021-22 which have been approved by the Hon'ble Commission. However, Tata Power-D had inadvertently missed out to claim this amount as Uncontrollable expenses in FY 2019-20 to FY 2021-22.

We request the Hon'ble Commission to consider the same.

2. *Reason of less recovery of wire Revenue in FY 2022-23 in comparison with the approved revenue*

Response

Tata Power-D in order to analyze the lower revenue recovery from wheeling charges has

plotted the difference between the approved revenue and sales Vs the actual sales and revenue realized. The same has been as given in the table below:

Table: Comparison between Approved wheeling revenue Vs Actual Revenue

Category	As per MTR TO		As per TP		As per TP	
	Sales in MU	Revenue	Total	Revenue	Diff	
	Direct	Direct	MUS	Rs Crores	MUS	Rs Crores
HT Category						
EHV - Industry	550.00		796.88	0.00	-246.88	0.00
HT I – Industry	946.61	100.14	958.84	101.20	-12.24	-1.06
EHV- Commercial	95.00		102.42	0.00	-7.42	0.00
HT II – Commercial	387.76	40.61	363.24	38.43	24.51	2.18
HT III - Group Housing Society	39.75	4.21	38.89	4.12	0.86	0.08
HT IV: HT - Mono/Metro/Railways	106.67	10.18	101.88	10.30	4.80	-0.11
HT IV - Railways (22/33 KV)	90.35	10.18	19.20	0.00	71.15	10.18
HT IV - Railways (Metro & Monorail)	16.32		82.67	10.30	-66.35	-10.30
HT V - Public Services	175.08	12.26	158.86	11.52	16.22	0.75
HT V(A) - Publ Serv Govt Hosp&Edu Inst	25.00	2.76	18.14	2.08	6.86	0.68
EHV - Public Services Others	60.24		59.22	0.00	1.02	0.00
HT V(B) - Public Services Others	89.84	9.50	81.50	9.43	8.34	0.07
HT VI: Electric Vehicle Charging Stations	16.20	1.71	15.98	1.68	0.21	0.03
Sub-total	2317.06	169.11	2536.99	167.25	-219.93	1.85
LT IB - Residential	605.10	108.43	569.49	102.15	35.61	6.28
0-100	151.96	27.23	155.85	4.28	-3.89	22.95
101-300	183.96	32.97	173.09	26.92	10.87	6.05
301-500	82.42	14.77	69.50	19.84	12.92	-5.07
501 and above	186.76	33.47	171.05	51.11	15.71	-17.65
LT II - Commercial	543.33	97.36	480.91	86.15	62.42	11.22
LT II(A) - Commercial upto 20 kW	124.73	22.35	97.92	17.59	26.82	4.77
LT II(B) - Commercial 20 to 50 kW	81.33	14.57	72.36	12.96	8.96	1.62
LT II(C) - Commercial > 50 kW	337.27	60.44	310.63	55.61	26.64	4.83
LT III (A) - Industrial upto 20 kW	25.00	4.48	21.16	3.79	3.84	0.69
LT III (B) - Industrial > 20 kW	232.89	41.73	213.25	38.18	19.64	3.55
LT IV - Public Services	30.13	5.40	29.57	5.30	0.56	0.10
LT IV(A) - Publ Serv Govt Hosp&Edu Inst	5.68	1.02	4.66	0.83	1.02	0.18
LT IV(B) - Public Services Others	24.46	4.38	24.91	4.46	-0.46	-0.08
LT VI: Electric Vehicle Charging Stations	2.00	0.36	1.34	0.24	0.66	0.12
Sub-total	1438.45	257.77	1315.71	235.81	122.74	21.96
15 days adjustment	0.00		10.86	2.25	-10.86	-2.25
Total	3755.52	426.88	3852.70	405.31	-97.19	21.57

It is observed from the above that, the wheeling revenue recovery is lower on account of

1. Lower realization of HT commercial sales in comparison with the approved values and hence, lower revenue recovery
2. Lower LT commercial sales to the tune of 62 Mus and LT residential sale by 35 Mus causes lower recovery of wheeling recovery to the tune of Rs 21.96 Cores as compared with the approved wheeling recovery.



3. *Give bifurcation of RE in FY 2023-24 contracted and additional*

Response

Bifurcation of RE in FY 2023-24 is submitted as a part of data Gap response.

4. *Add one more column of MYT in comparison for FY 2023-24*

Response

Tata Power-D in its revised MTR Tariff petition has added column of MYT for comparison of actual values for FY 2023-24.

5. *Consider standby charges in FY 2023-24 for H2*

Response

The Hon'ble Commission in its MTR Tariff Order has considered the standby charges for estimation of power purchase cost of Tata Power-D. However, the Hon'ble APLET in its Order dated 5th January, 2024 in Appeal No. 369 of 2023 & IA No. 1924 OF 2023 & IA No. 2105 OF 2023 has set aside the projection for FY 2023-24 and FY 2024-25. Further, Tata Power-D has not paid any standby charges from 1st October 2023. In consideration of the same we request the Hon'ble Commission not to consider standby charges for the year H1 of FY 2023-24 and for the year FY 2024-25.

6. *Consumer and Sales addition after APTEL Order and before APTEL Order*

Response

Details of Sales addition post APTEL Order and before APTEL Order is as given below: .



Table: Reverse Changeover data-1st April 2023 to 13th July 2023

Rate Category	Count of CA No	Sum of MUS
LT1_RESI	2,900	3.40
LT2ACOM	268	0.94
LT2BCOM	24	0.19
LT2CCOM	17	0.38
LT3_IND	43	0.26
LT4_IND	24	0.05
LT9_PSO	1	0.00
Grand Total	3,277	5.21

Table: Changeover data -14th July 2023 to till Date

Rate Category	Count of CA No	Sum of Mus
HT1_IND	1	0.24
HT6_PSO	1	2.81
LT1_RESI	470	1.72
LT11_EV	1	0.00
LT2ACOM	4	0.04
LT3_IND	6	0.03
Grand Total	483	4.84

Table: Reverse Switchover Data – 1st April 2023 to 13th July 2023

	No of Cases	MUs	HT - Industry	LT - Residential	HT IV - RAILWAYS / METRO / MONORAI
Reverse Switchover completed – before 13 th July 2023 – Nos and MUS	5	84.07	1	1	3

Table: Switchover Completed – 14th July 2023 to till date

	No of Cases	MUs	LT I(B) - Residential	LT II(A) - Commercial upto 20 kW	LT III(B) - Industrial > 20 kW	LT III(A) - Industrial upto 20 kW	HT IV - RAILWAYS / METRO / MONORAIL	HT V (B) - PUBLIC SERVICES OTH	HT II – Commercial	HT V(A) - Publ Serv Govt Hosp & Edu Inst
Switchover Completed – post 14 th July 2023 – Nos and Mus	192	108.025	169	14	2	1	3	1	1	1

7. *Physical progress of smart meter DPR wise*

Response

Tata Power-D has installed 1.07 lakh smart meters till date. The DPR wise physical progress is as follows:

Table: Physical progress of Smart DPR

Smart Meter DPR	Approved (Rs. Crs)	Physical Progress
MERC/CAPEX/2019-20/106 Dated 05.04.2019	59.75	Installed 74 K Smart Meters. Backbone infrastructure created for 1 lakh smart meters.
MERC/CAPEX/FY2022-23/0467 dated 06.10.2022	21.7	Installed 33 K smart meters
MERC/CAPEX/FY2023-24/0289 dated 20.06.2023	371.15	Procurement process in advanced stages for 1.5 lakh Smart Meters

Further, following facilities have been provided under smart metering to our consumers:

1. Remote reading
2. Remote connection/disconnection
3. Near Real Time consumption trend monitoring
4. Load disaggregation.
5. Providing various alerts like sudden increase in daily consumption, peak period consumption, high MD, slab crossover, safety alerts for earth load etc.

Post Paid / Pre paid facility



Pre-paid facility has been created and backend system has been kept ready for all consumers for whom smart meters are installed. However, currently all these consumers barring only 2 cases are being billed on postpaid method.

8. *LOI for the RE power based on which contracted RE purchase for FY 2024-25 has been considered*

Response

LOI for RE power based on which contracted RE purchase for FY 2024-25 has been considered has been attached as **Annexure 1** to this submission.

9. *Computation of FAC considered in the FY 2023-24 for revenue recovery.*

Response

FAC computation has been attached as **Annexure 2** to this submission.

10. *Revenue with Existing MYT tariff plus FAC for FY 2024-25*

Response

Tata Power-D will submit the revenue computation with existing tariff including FAC as a part of Format. The same has been attached as **Annexure 3** to this submission.

11. *Back up computation for considering GFA ratio of 1:65:34 for FY 2024-25*

Response

Back up computation for GFA ratio of 1:65:34 is attached as **Annexure 4** to this submission.

12. *Back up tables for Bilateral Power Purchase and Renewable Energy Purchase for FY 2022-23*



Response

Back up computation for the bilateral power purchase and renewable energy purchase for FY 2022-23 and FY 2023-24 H1 PP have been incorporated as a part of Tata Power-D formats and same has been attached as **Annexure 5** to this submission.

13. Details of Security Deposit

Response

We will provide shortly.