

True up for FY 2021-22,

Review of FY 2022-23,

AND

ARR for FY 2023-24

And

**Determination of Transmission Tariff for
FY 2023-24**

Main Text & Formats (Volume I)

Submitted to

**Joint Electricity Regulatory Commission
Gurgaon**

By:

**Electricity Department of Daman & Diu
(Daman)**

December 2022



BEFORE THE JOINT ELECTRICITY REGULATORY COMMISSION
FOR THE STATE OF GOA & UNION TERRITORIES

Filing No.....

Case No.....

IN THE MATTER OF: Filing of Aggregate Revenue Requirement (ARR) for the
FY 2023-24 under Section 62 and 86 of the Electricity Act,
2003

AND

IN THE MATTER OF Electricity Department of Daman & Diu
(hereinafter referred to as "EDDD" or "The Petitioner")
Daman - Applicant

The Applicant respectfully submits as under: -

1. The Electricity Department of Daman & Diu ("EDDD") is a statutory body engaged in the electricity transmission and solar generation in Daman & Diu. Consequent to the enactment of the Electricity Act, 2003 (hereinafter referred to as the "Act"), the process of approval of proposed tariffs is vested with the State Commission.
2. This is a Petition indicating the True up Petition for FY 2021-22, Review for the FY 2022-23, Aggregate Revenue Requirement (ARR) and Determination of Transmission Tariff of EDDD for the FY 2023-24 (Financial Year 2023-24).



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TABLE OF CONTENTS

CHAPTER I: INTRODUCTION	8
1.1 EDDD PROFILE.....	8
1.2 SOLAR GENERATION.....	9
1.3 MULTI YEAR TARIFF REGULATIONS, 2021	10
1.3.1 UNCONTROLLABLE PARAMETERS INCLUDE	10
1.3.2 CONTROLLABLE PARAMETERS INCLUDE.....	11
1.4 CONTENTS OF THIS PETITION.....	12
CHAPTER 2: TRUE UP FOR FY 2021-22	13
2.1 PRINCIPLES FOR TRUE UP FOR FY 2021-22	13
2.2 ENERGY SALES FOR FY 2021-22.....	13
2.3 DISTRIBUTION LOSS FOR FY 2021-22.....	14
2.4 ENERGY REQUIREMENT AND ENERGY BALANCE.....	15
2.5 POWER PURCHASE COST	16
2.6 OPERATION AND MAINTENANCE EXPENSES	17
2.7 CAPITAL EXPENDITURE & CAPITALIZATION	18
2.8 DEPRECIATION	19
2.9 INTEREST AND FINANCE CHARGES.....	19
2.10 INTEREST ON WORKING CAPITAL.....	20
2.11 RETURN ON EQUITY.....	21
2.12 INTEREST ON CONSUMER SECURITY DEPOSITS.....	21
2.13 NON - TARIFF INCOME.....	22
2.14 INCENTIVE/DISINCENTIVE TOWARDS OVER/UNDER ACHIEVEMENT OF NORMS OF DISTRIBUTION LOSSES.....	22
2.15 AGGREGATE REVENUE REQUIREMENT FOR FY 21-22	23
2.16 REVENUE FOR FY 21-22.....	23
2.17 REVENUE (GAP) / SURPLUS FOR FY 21-22.....	24
CHAPTER 3: REVIEW FOR THE FY 2022-23	25
3.1 OPERATION & MAINTENANCE COSTS	25
3.2 CAPITAL EXPENDITURE PLAN.....	26
3.3 GROSS FIXED ASSETS	26
3.4 DEPRECIATION	27
3.5 INTEREST & FINANCIAL COSTS	27
3.5.1 INTEREST ON LONG-TERM/ CAPITAL LOANS.....	27
3.5.2 INTEREST ON WORKING CAPITAL BORROWINGS	28
3.6 RETURN ON EQUITY.....	29



Page 3



3.7	NON-TARIFF & OTHER INCOME	31
3.8	AGGREGATE REVENUE REQUIREMENT	31
3.9	REVENUE FROM EXISTING TARIFF.....	31
3.10	COVERAGE OF REVENUE GAP.....	32
	CHAPTER 4: ARR FOR THE FY 2023-24.....	33
4.1	OPERATION & MAINTENANCE COSTS	33
4.1.1	EMPLOYEE EXPENSE	34
4.1.2	REPAIRS & MAINTENANCE EXPENSE	35
4.1.3	ADMINISTRATION & GENERAL EXPENSE	36
4.1.4	TOTAL OPERATION AND MAINTENANCE EXPENSE	37
4.2	CAPITAL EXPENDITURE PLAN.....	37
4.3	GROSS FIXED ASSETS	39
4.4	DEPRECIATION	40
4.5	INTEREST & FINANCE COSTS	41
4.5.1	INTEREST ON LONG-TERM / CAPITAL LOANS	41
4.5.2	INTEREST ON WORKING CAPITAL BORROWINGS	42
4.6	RETURN ON EQUITY.....	43
4.7	NON-TARIFF & OTHER INCOME	44
4.8	AGGREGATE REVENUE REQUIREMENT	44
4.9	COVERAGE OF REVENUE GAP.....	44
	CHAPTER 5: TARIFF DETERMINATION FOR FY 2023-24.....	46
5.1	DETERMINATION OF THE TRANSMISSION CAPACITY OF THE SYSTEM.....	46
5.2	TARIFF DETERMINATION	46
5.3	OPEN ACCESS.....	47
	CHAPTER 6: DIRECTIVES	48
	PRAYER.....	52



LIST OF TABLES

TABLE 1: SOLAR PLANTS INSTALLED AT DAMAN AND DIU	9
TABLE 2: LEVELISED TARIFF OF SOLAR PLANTS.....	10
TABLE 3: CONSUMER CATEGORY WISE ENERGY SALES FOR FY 2021-22	13
TABLE 4: DISTRIBUTION LOSS.....	15
TABLE 5: APPROVED ENERGY BALANCE FOR FY 2021-22.....	15
TABLE 6: POWER PURCHASE COST FOR FY 2021-22	16
TABLE 7: OPERATION & MAINTENANCE EXPENSES FOR FY 2021-22.....	18
TABLE 8: CAPITAL EXPENDITURE AND CAPITALIZATION FOR FY 21-22.....	19
TABLE 9: DEPRECIATION FOR FY 2021-22	19
TABLE 10: INTEREST ON LOAN FOR FY 21-22.....	20
TABLE 11: INTEREST ON WORKING CAPITAL FOR FY 2021-22.....	20
TABLE 12: RETURN ON EQUITY FOR FY 21-22.....	21
TABLE 13: INTEREST ON CONSUMER SECURITY DEPOSIT FOR FY 21-22.....	21
TABLE 14: NON TARIFF INCOME FOR FY 21-22.....	22
TABLE 15: INCENTIVE DUE TO OVER-ACHIEVEMENT OF INTRA-STATE DISTRIBUTION LOSS TARGET	23
TABLE 16: AGGREGATE REVENUE REQUIREMENT FOR FY 21-22.....	23
TABLE 17: REVENUE FOR FY 21-22	24
TABLE 18: REVENUE (GAP)/SURPLUS FOR FY 21-22	24
TABLE 19: O&M EXPENSE FOR FY 22-23.....	25
TABLE 20: CAPITAL EXPENDITURE & CAPITALIZATION FOR FY 22-23	26
TABLE 21: OPENING AND CLOSING GFA FOR FY 22-23	26
TABLE 22: DEPRECIATION RATE SPECIFIED IN THE CERC REGULATIONS, 2019	27
TABLE 23: DEPRECIATION FOR FY 22-23	27
TABLE 24: INTEREST ON LONG-TERM/CAPITAL LOANS FOR FY 22-23.....	28
TABLE 25: INTEREST ON WORKING CAPITAL FOR FY 22-23.....	29
TABLE 26: RETURN ON EQUITY FOR FY 22-23	30
TABLE 27: NON-TARIFF INCOME FOR FY 22-23	31
TABLE 28: AGGREGATE REVENUE REQUIREMENT FOR FY 22-23.....	31
TABLE 29: REVENUE FOR FY 22-23	31
TABLE 30: REVENUE GAP/SURPLUS FOR FY 22-23	32
TABLE 31: EMPLOYEE EXPENSES.....	34
TABLE 32: REPAIRS & MAINTENANCE EXPENSE.....	35
TABLE 33: A&G EXPENSE.....	37
TABLE 34: TOTAL O&M EXPENSE.....	37
TABLE 35: CAPITAL EXPENDITURE FOR THE FY 2023-24.....	38
TABLE 36: CAPITAL EXPENDITURE & CAPITALIZATION FOR THE FY 2023-24.....	39
TABLE 37: OPENING AND CLOSING GFA FOR THE FY 2023-24	40
TABLE 38: DEPRECIATION	40
TABLE 39: TOTAL INTEREST ON LONG-TERM LOANS	41
TABLE 40: INTEREST ON WORKING CAPITAL FOR THE FY 2023-24	42
TABLE 41: PROPOSED RETURN ON EQUITY	43
TABLE 42: NON-TARIFF INCOME.....	44
TABLE 43: AGGREGATE REVENUE REQUIREMENT	44
TABLE 44: REVENUE GAP FOR FY 2023-24.....	45
TABLE 45: TRANSMISSION CAPACITY OF THE TRANSMISSION SYSTEM	46
TABLE 46: TARIFF DETERMINATION	46



ACRONYM	DEFINITION
A&G Expenses	Administrative & General Expenses
CEA	Central Electricity Authority
CERC	Central Electricity Regulatory Commission
Ckt. Km / ckm	Circuit Kilometres
EA 2003	Electricity Act 2003
G,T and D	Generation, Transmission and Distribution
GFA	Gross Fixed Assets
GoI	Government of India
IPPs	Independent Power Producers
JERC	Joint Electricity Regulatory Commission
EDDD	Electricity Department of Daman & Diu
MU	Million Units
MYT	Multi-Year Tariff
O&M	Operations and Maintenance
PGCIL	Power Grid Corporation of India Limited
R&M Expenses	Repair & Maintenance Expenses
RoE	Return on Equity
T&D	Transmission and Distribution
S/S	Sub Station



Circuit (D/C) lines and 88.70 kms of 66kV lines. Presently, there are 6 no. 66 kV feeders in the network of Daman & Diu.

The key duties being discharged by Daman & Diu Electricity Department are:

- Operating and maintaining sub-stations and dedicated transmission lines connected there with as per the provisions of the Act and the Rules framed there under.
- Arranging, in-coordination with the WRPC/WRLDC for outage management and other SLDC related matters within the State;
- Preparing and carrying out schemes for transmission of electricity and generally for promoting the use of electricity within the State.

At present, Daman gets power at 220/66 KV Magarwada substation and 220/66 KV Ringanwada substation. The 220/66 KV Magarwada substation is getting power from 220 KV (D/C) Ambethi-Magarwada line and from 220 KV (D/C) Magarwada (PGCIL) Magarawada, Daman. The 220/66 KV Ringanwada substation is getting power from 220 KV (D/C) Magarwada (PGCIL) Magarawada, Daman. Diu gets power from 66 kV Una substation through 66 kV double circuit line emanating from 220 /66 kV Kansari substation of GETCO.

Considering the increase in demand from the large industries, the demand is likely to reach to 360-370 MW by FY 2022-23. In view of the power demand in future, EDDD had proposed a number of schemes to be implemented during the coming years for strengthening and augmentation of the transmission system in the territory.

1.2 Solar Generation

The EDDD has installed Ground Mounted Solar PV Plants and Rooftop Solar PV Plants in Daman and Diu. The Ground Mounted Solar PV Plants and Rooftop Solar PV Plants installed and commissioned in Daman and Diu is as tabled below:

Table 1: Solar Plants installed at Daman and Diu

Description	Rating of the Plant (kWp)	COD	Amount (CR)
Roof top solar PV system	4416	Feb 2013 to November 2020	28.15
1 MWp Solar Plant Magarwada	1000	08-01-2015	8.50
3 MWp SOLAR PLANT FUDAM DIU	3000	10-04-2015	25.50
6 MWp SOLAR PLANT FUDAM DIU	6000	07-06-2015	36.98



Description	Rating of the Plant (kWp)	COD	Amount (CR)
Total	14416		99.13

The levelised tariff for the above mentioned approved by the Hon'ble JERC are provided in the table given below:

Table 2: Levelised Tariff of Solar Plants

S.N	Plants details	Rate (Rs.) per kWh
1	Roof-top Solar PV - Before July 2019	6.15
2	Roof-top Solar PV - July 2019 to March 2020	4.73
3	Roof-top Solar PV - FY 2020-21	4.72
4	3 MW Solar Plant	6.31
5	6 MW Solar Plant	5.97
6	1 MW Solar Plant	6.31

The EDDD is under the process of enhancement of the capacity of solar plants in order to support the GOI initiative of 500 GW Renewable Energy by 2030. It is intimated that the 3 MW capacity plant was damaged during the last cyclone Tauktae in May, 2021 and is presently working with capacity of 1.22 MW only. Hence, the EDDD proposes to enhance the capacity of the existing solar plants i.e. enhancement of 2.56 MW capacity at 6 MW Solar PV plant and enhancement of 4.91 MW capacity at 3 MW Solar PV plant (working at 1.22 MW) at Diu.

1.3 Multi Year Tariff Regulations, 2021

EDDD's tariff determination is now governed by "Joint Electricity Regulatory Commission for the State of Goa and Union Territories (Generation, Transmission and Distribution Multi Year Tariff) Regulations, 2021, hereinafter referred to as "MYT Regulations". The MYT Regulations, 2021 provide a framework for calculating tariffs on a cost-plus basis initially for a period of three years and allow the licensee to recover operational expenses including depreciation, interest on working capital and debt, and return on equity amongst others. The MYT Regulations, 2021 segregate the items impacting tariffs into controllable and uncontrollable factors. Items that are uncontrollable are passed through to the consumers. Further, the MYT Regulations, 2018 identifies the uncontrollable and controllable parameters as follows:

1.3.1 Uncontrollable Parameters include

- 1 Force Majeure events;



- 2 Change in Law, judicial pronouncements and Orders of the Central Government, State Government or Commission;
- 3 Variation in the number or mix of Consumers or quantities of electricity supplied to Consumers;
- 4 Transmission loss;
- 5 Variation in the cost of power purchase due to variation in the rate of power purchase from approved sources, subject to clauses in the power purchase agreement or arrangement approved by the Commission;
- 6 Variation in fuel cost;
- 7 Change in power purchase mix;
- 8 Inflation;
- 9 Transmission Charges for a Distribution Licensee;
- 10 Variation in market interest rates for long-term loans;
- 11 Employee expenses limited to one time payment owing requirements of a pay commission and terminal liability of employees;
- 12 Taxes and Statutory levies;
- 13 Taxes on income;
- 14 Income from the realisation of bad debts written off:

1.3.2 Controllable Parameters include

- 1 Variations in capitalisation on account of time and/or cost overruns/ efficiencies in the implementation of a capital expenditure project not attributable to an approved change in scope of such project, change in statutory levies or force majeure events;
- 2 Variation in Interest and Finance Charges, Return on Equity, and Depreciation on account of variation in capitalisation, as specified in clause (a) above;
- 3 Variations in technical and commercial losses of Distribution Licensee;
- 4 Availability of transmission system;
- 5 Variations in performance parameters;
- 6 Failure to meet the standards specified in the Joint Electricity Regulatory Commission for the State of Goa & UTs (Standard of Performance for Distribution Licensees) Regulation, 2015, as amended from time to time;
- 7 Variations in labour productivity;
- 8 Variation in O&M Expenses, except to the extent of inflation;



9 Bad debts written off;

1.4 Contents of this Petition

This Petition covers the truing up for FY 21-22, revised estimates for FY 22-23 and the basis, assumptions and projections of individual elements constituting the determination of ARR for the FY 2023-24. The Joint Electricity Regulatory Commission for the state of Goa and union territories (JERC) had issued the first Tariff Order for Electricity Department of Daman & Diu (EDDD) on 1st November 2010 and subsequently the second, third, fourth, fifth, sixth, seventh, eighth, ninth, tenth, eleventh and twelfth Tariff order for FY 11-12, FY 2012-13, FY 2013-14, FY 2014-15, FY 2015-16, MYT Control Period FY 2016-17 to FY 2018-19, FY 2017-18, FY 2018-19, MYT Control Period FY 2019-20 to FY 2021-22, FY 2020-21, FY 2021-22 and MYT Control Period FY 2022-23 to FY 2024-25 for EDDD were issued on 3rd October, 2011, 25th August, 2012, 22nd March, 2013, 1st May, 201, 31st March, 2015, 6th April, 2016, 29th May, 2017, 23rd March, 2018, 20th May, 2019, 18th May, 2020, 23rd March, 2021 and 31st March, 2022 respectively. The Commission in its Tariff Order for the MYT Control Period FY 2022-23 to FY 2024-25 has approved the ARR for the Control Period FY 2022-23 to FY 2024-25 based on the actual cost for FY 20-21 and estimated expenses for FY 21-22.



Chapter 2: True Up for FY 2021-22

2.1 Principles for True Up for FY 2021-22

As per JERC MYT Regulations, 2018, the Hon'ble Commission shall undertake the True Up of licensee for FY 2021-22 based on the comparison of the actual performance of the past year with the approved estimates for such year.

In line with the provisions of JERC MYT Regulations, EDDD is filing its True Up for the year FY 2021-22. Information provided in the True Up for FY 2021-22 is based on the Annual Accounts and principles adopted by the Hon'ble Commission in its previous orders on Interest on Term Loan, Return on Equity, Interest on Working Capital and Depreciation. This actual performance has been compared with the approved parameters as per the order dated 23rd March, 2021 and 31st March, 2022 for the FY 2021-22.

Accordingly, revised Aggregate Revenue Requirement, revenue and gap for FY 2021-22 are given in the following paragraphs of this chapter.

2.2 Energy Sales for FY 2021-22

The actual energy sale for FY 2021-22 has been shown below along with approved sales by Hon'ble Commission vide Tariff Order dated 23^d March, 2021 and 31st March, 2022. The actual energy sales for FY 2021-22 are as under:

Table 3: Consumer category wise energy sales for FY 2021-22

Particulars	(MU)		
	FY 21-22 Approved (23 rd March, 2021)	FY 21-22 Approved (31 st March, 2022)	FY 21-22 Actual
Domestic	163.72	140.09	138.13
LIG/ Kutir Jyoti	0.00	0.00	0.00
Commercial	46.13	45.41	47.25
Agriculture	3.37	3.18	3.37
LT Industry	221.36	203.61	219.12
HT/EHT Industry	2155.94	2035.65	2,063.10
Public Lighting	5.64	5.11	5.03
Public Water Works	2.46	2.53	2.74
Temp. Supply	0.00	0.00	3.60
Total Sales	2,598.62	2,435.58	2,482.34

*LIG sales is included in the Domestic category



It can be observed from the above that there is a slight variation in the actual energy sold as compared to the energy sales approved by the Commission vide the Tariff Order dated 31st March, 2022. The reasons attributable for the same are:

- The actual sales of the HT category for the FY 2021-22 was 2063.10 MUs as compared to 2035.65 MUs approved by the Hon'ble Commission in its Tariff Order dated 31st March, 2022.
- The actual sales of the LT category for the FY 2021-22 was 219.12 MUs as compared to 203.61 MUs approved by the Hon'ble Commission in its Tariff Order dated 31st March, 2022.
- The actual sold to the Domestic category was 138.13 MUs as compared to 140.09 MUs approved by the Hon'ble Commission in its Tariff Order dated 31st March, 2022.
- The actual sold to the Commercial category was 47.25 MUs as compared to 45.41 MUs approved by the Hon'ble Commission in its Tariff Order dated 31st March, 2022.
- Overall the actual sales has increased by 46.76 MUs in comparison to the sales approved by the Hon'ble Commission vide its Tariff Order dated 31st March, 2022.

The EDDD requests the Hon'ble Commission to approve the actual sales for FY 2021-22.

2.3 Distribution Loss for FY 2021-22

In FY 2021-22, the actual distribution losses were 4.45% as against the approved level of 6.50%.

In the Tariff Order dated 23rd March, 2021 and 31st March, 2022 the Hon'ble Commission had approved the distribution losses at 6.50% for the FY 2021-22. However, now EDDD has computed the distribution loss based on the actual sales data for FY 21-22. Based on that the distribution loss for FY 21-22 has been worked out at 4.45%. The table below highlights the comparison of actual distribution losses of the EDDD against that approved by the Hon'ble Commission vide its Tariff Order dated 23rd March, 2021 and 31st March, 2022.



Table 4: Distribution Loss

Particulars	FY 21-22		
	Approved (23rd March, 2021)	Approved (31st March, 2022)	(%) FY 21-22 Actual
Distribution Loss	6.50%	6.50%	4.45%

The EDDD requests the Hon'ble Commission to approve the actual T&D losses for FY 21-22.

2.4 Energy Requirement and Energy Balance

Based on the actual energy sales and the transmission & distribution loss units, the actual energy requirement for FY 21-22 has been furnished below. The energy requirement had been met through various sources as described in the subsequent sections.

Table 5: Approved Energy Balance for FY 2021-22

Particulars	FY 21-22	
	Approved (31st March, 2022)	(MU) FY 21-22 Actual
Retail Sales (a)	2435.58	2482.34
Open Access Sales (b)	0.00	0.00
Less: Energy Savings (c)	0.00	0.00
Total Sales (d=a+b-c)	2435.58	2482.34
Distribution Loss (MU) (e=g-d)	169.32	115.72
Distribution Loss (%) (f=e/g)	6.50%	4.45%
Energy Required at Periphery (g)	2604.90	2598.06
Sale to common pool consumer/UI Sale(h)	0.00	16.14
Own generation (i)	11.25	11.98
Total energy requirement at state periphery(j=g+h-i)	2593.65	2602.22
Less: Energy Purchased through UI at Periphery (k)	71.19	106.17
Less: Open Access Purchase at Periphery (l)	0.00	0.00
Less: Energy Purchased through Renewable Sources (m)	0.00	0.00
Less: Energy Purchased through IEX (n)	143.27	160.04
Energy requirement at state periphery from tied up sources (o=j-k-l-m-n)	2379.19	2336.01
Inter state loss (MU) (p=q-o)	3.66%	3.69%
Inter state loss (%)	90.38	89.40
Energy requirement at state periphery from generator end (q)	2469.57	2425.41
Total Energy requirement from tied up sources, UI and renewable sources at generator end (r=i+k+m+n)	2695.28	2703.60
Total Energy requirement in ut including Open Access (r=q+l)	2695.28	2703.60



The net energy requirement for sale during FY 2021-22 was 2703.60 MUs.

2.5 Power Purchase Cost

EDDD sources power from Central Generating Stations like Korba, Vindhyachal, Kahalgaon, Kawas of National Thermal Power Corporation (NTPC) and Tarapur and Kakrapar atomic power stations of Nuclear Power Corporation of India Limited (NPCIL) etc. The actual power purchase for the FY 21-22 is provided in the table below and compared with the power purchase approved by the Hon'ble Commission.

Table 6: Power purchase cost for FY 2021-22

Particulars	MUs		Cost (Rs. Crore)	
	FY 21-22 Approved	FY 21-22 Actual	FY 21-22 Approved	FY 21-22 Actual
Power Purchase	2,695.28	2,703.60	1,241.16	1263.40

The power purchase depends on various parameters such as the energy sales, distribution loss, energy requirement and the energy availability. The variation in the power purchase cost from the Tariff Order is on account of variation in sales and variation in actual cost with respect to the base rate along with purchase of power from short-term sources to meet the shortfall during the year.

Cost towards Own Generation of Solar Power Installed by EDDD

The Hon'ble Commission in petition no. 42/2021 has determined the cost of generation for solar plants owned and operated by EDDD. The units generated from these plants during the FY 2021-22 is 11.99 MUs and these units have been distributed to the consumers and accordingly, the cost of generation of these units has been claimed as power purchase cost as tabled below;

S. N	Plants details	Units (MUs)	Rate (Rs.) per kWh	Power Cost (Cr)
1	Roof-top Solar PV - Before July 2019	2.38	6.15	1.47
2	Roof-top Solar PV - July 2019 to March 2020	0.10	4.73	0.05
3	Roof-top Solar PV - FY 2020-21	0.06	4.72	0.03
4	3 MW Solar Plant	0.68	6.31	0.43
5	6 MW Solar Plant	7.64	5.97	4.56
6	1 MW Solar Plant	1.13	6.31	0.71
	Total	11.99		7.24



The Hon'ble Commission had approved the power purchase at Rs. 1241.16 Crore in the Tariff Order dated 31st March, 2022. Now, the EDDD has claimed a power purchase cost of Rs. 1263.40 Crore based on the Annual accounts for FY 21-22 and there is an increase in the power purchase cost as compared to the power purchase cost approved by the Hon'ble Commission. The same is attributable to the increase in sales witnessed during the FY 2021-22.

The EDDD also requests the JERC to allow the UI purchase during FY 21-22 without any penalty as the EDDD has already incurred that amount. Therefore, the EDDD has included that total UI amount paid in the total power purchase cost for FY 21-22.

The EDDD purchased 106.17 MU during FY 21-22 through UI at the cost of Rs. 44.83 Crore to meet the energy shortfall during the year. The EDDD also purchased 160.04 MUs during FY 2021-22 from the energy exchange at the cost of Rs. 64.04 Crore to meet its energy demand.

Further, the EDDD procured 11.98 MUs of solar energy from its rooftop and ground mounted solar plants during the FY 2021-22 to meet its solar obligation. Also, the solar power generated through rooftop plants installed by the industries was 18.03 MUs during FY 2021-22. Apart from this, 12.25 MUs was generated through biomass plant and 29.15 MUs of renewable energy was procured through the power exchange during FY 2021-22. Hence, in total the EDDD generated and procured 75.72 MUs of renewable energy during the FY 2021-22.

The EDDD, therefore, requests the Hon'ble Commission to approve the actual power purchase cost for FY 21-22 without any deduction.

2.6 Operation and Maintenance Expenses

Operations and Maintenance (O&M) Expenses of the department consists of the following elements:

- Employee Expenses
- Repairs and Maintenance Costs
- Administrative and General Expenses

Employee expenses comprise of salaries, dearness allowance, bonus, terminal benefits in the form of pension & gratuity, leave encashment and staff welfare expenses.



Repairs and Maintenance Expenses go towards the day to day upkeep of the transmission and distribution network of the department and form an integral part of its effort towards reliable and quality power supply as also in the reduction of losses in the system.

Administration expenses mainly comprise of rents, telephone and other communication expenses, professional charges, conveyance and travelling allowances, other debits.

The Hon'ble Commission had approved the O&M cost at Rs. 51.93 Crore and Rs. 48.90 Crore vide Tariff Orders dated 23rd March, 2021 and 31st March, 2022 respectively. During FY 21-22, EDDD incurred actual O&M expense of Rs. 54.45 Crore which was inclusive of employee cost of Rs. 14.44 Crore, Repair & Maintenance Charges of Rs. 27.15 Crore and Administration & General Expenses of Rs. 12.85 Crore as shown in the table below:

Table 7: Operation & Maintenance Expenses for FY 2021-22

Particulars	(Rs. Crore.)		
	FY 21-22 Approved (23 rd March, 2021)	FY 21-22 Approved (31 st March, 2022)	FY 21-22 Actual
Employee Cost	18.03	16.32	14.44
R&M	22.34	17.81	27.15
A&G	11.56	14.77	12.85
O&M Expenses	51.93	48.90	54.45

The repair and maintenance expenses have increased by Rs. 9.34 Crores. The same is attributable to the repair and maintenance carried out by the EDDD after the cyclone tauktae caused damage to the power distribution system in the UT. The revised estimates submitted by the EDDD for FY 2021-22 were based on the half yearly actual cost incurred by the Department. However, the O&M cost as submitted for the truing up purpose is based on the actual cost incurred by the EDDD during the FY 2021-22. The EDDD, therefore, requests the Hon'ble Commission to approve the O&M expenses for FY 21-22 as submitted in herewith.

2.7 Capital Expenditure & Capitalization

The actual capital expenditure incurred by EDDD during the FY 21-22 was Rs. 39.17 Crore, which is higher than that of approved by the Hon'ble Commission in its Tariff Order dated 31st March, 2022. The capital expenditure incurred and actual



capitalization made by the department for FY 21-22 against that approved by the Hon'ble Commission is as shown below:

Table 8: Capital expenditure and capitalization for FY 21-22

Particulars	(Rs. Crore)		
	FY 21-22 Approved (23rd March, 2021)	FY 21-22 Approved (31st March, 2022)	FY 21-22 Actual
Capital Expenditure	19.60	20.00	39.17
Capitalisation	49.00	5.00	39.17

The EDDD, therefore, requests the Hon'ble Commission to approve the capital expenditure and capitalization for FY 21-22.

2.8 Depreciation

The depreciation has been worked out after applying the Depreciation rates as per the JERC MYT Regulations, 2018. Accordingly, the depreciation so arrived and approved depreciation for FY 2021-22 is shown in the table below:

Table 9: Depreciation for FY 2021-22

Particulars	(Rs. Crore.)		
	FY 21-22 Approved (23rd March, 2021)	FY 21-22 Approved (31st March, 2022)	FY 21-22 Actual
Opening GFA	665.69	533.36	546.24
Addition during the year	49.60	5.00	39.17
Closing GFA	715.29	538.36	585.41
Average GFA	690.49	535.86	565.83
Depreciation during the year	24.04	18.36	28.44

The EDDD, requests the Hon'ble Commission to approve the actual depreciation for FY 21-22 without any deduction.

2.9 Interest and Finance Charges

For assessing interest on Loans in FY 21-22, EDDD has considered the opening balance of loans for FY 21-22 as approved by the Hon'ble Commission vide its Tariff Order dated 31st March, 2022 for the Review of the ARR for FY 21-22. The normative loan addition in FY 21-22 has been computed as 70% of the capitalization for FY 2021-22 which works out to Rs. 27.42 Crore. The capitalization for FY 21-22 was Rs. 39.17 Crore as per the audited annual accounts for FY 21-22.

As per the JERC (Multi Year Distribution Tariff) Regulations, 2018, the repayment of loan during the year has been considered equal to the depreciation for the FY 2021-22.



Further the rate of interest has been considered as equal to the SBI PLR as on April 01, 2021 plus 100 basis points of 8.00%.

The following table depicts the total Interest & Financial charges for FY 21-22 computed by EDDD and compared the same with the approved Interest and Financial charges amount for the consideration of the Hon'ble Commission:

Table 10: Interest on Loan for FY 21-22

Particulars	(Rs. Crore.)		
	FY 21-22 Approved (23rd March, 2021)	FY 21-22 Approved (31st March, 2022)	FY 21-22 Actual
Opening Loan	140.53	73.06	124.37
Loan for additional Capex (70:30 debt-equity)	34.30	3.50	27.42
Loan Repayment	24.05	18.36	28.44
Closing Loan	150.78	58.20	123.35
Interest Cost on Avg. Loans	11.65	5.25	9.91

The EDDD, requests the Hon'ble Commission to approve the interest on loan computed for FY 21-22.

2.10 Interest on Working Capital

The interest on working capital has been calculated based on the normative principles outlined by the Hon'ble Commission in the JERC (Multi Year Distribution Tariff) Regulations, 2018.

EDDD has computed interest on working capital at 9.00% as equal to the SBI PLR as on April 01, 2021 plus 200 basis points. The following table shows the interest on working capital for FY 2021-22 against the approved amount for the consideration of the Hon'ble Commission:

Table 11: Interest on Working Capital for FY 2021-22

Particulars	(Rs. Crore.)		
	FY 21-22 Approved (23rd March, 2021)	FY 21-22 Approved (31st March, 2022)	FY 21-22 Actual
O&M expense for one month	4.33	4.08	4.54
Maintenance spares at 40% of R&M for one month	0.74	0.59	0.91
Receivables for 2 months	212.28	215.03	234.34



Particulars	FY 21-22 Approved (23rd March, 2021)	FY 21-22 Approved (31st March, 2022)	FY 21-22 Actual
Less consumer security deposit but excluding Bank Guarantee/Fixed Deposit Receipt	87.32	95.87	105.46
Total Working Capital requirement	130.03	123.83	134.33
Interest on Working Capital	12.68	11.14	12.09

The EDDD, requests the Hon'ble Commission to approve the interest on working capital computed for FY 21-22.

2.11 Return on Equity

As per the JERC (Multi Year Distribution Tariff) Regulations, 2018, EDDD is entitled for a Return on Equity (RoE).

Return on equity has been computed on the actual paid up equity. The rate of return has been taken as 16% as per the MYT Regulations. Accordingly, the 16% post tax return on equity computed for FY 2021-22 is given in the Table below:

Table 12: Return on Equity for FY 21-22

Particulars	(Rs. Crore.)		
	FY 21-22 Approved (23rd March, 2021)	FY 21-22 Approved (31st March, 2022)	FY 21-22 Actual
Return on Equity	16.95	11.40	15.61

The EDDD, requests the Hon'ble Commission to approve the return on equity computed for FY 21-22.

2.12 Interest on consumer security deposits

The Hon'ble Commission in its last Tariff Order has approved Rs. 3.67 Crore as interest payable on consumer security deposits. The actual interest on consumer security deposit paid by the EDDD was Rs. 4.00 Crores. The details of the interest on consumer security deposit have been given in the table below:

Table 13: Interest on Consumer Security Deposit for FY 21-22

Particulars	(Rs. Crore.)		
	FY 21-22 Approved	FY 21-22 Approved	FY 21-22 Actual



	(23rd March, 2021)	(31st March, 2022)
Interest on Security Deposit	4.68	3.67
		4.00

The EDDD, requests the Hon'ble Commission to approve the interest on consumer security deposit submitted for FY 21-22.

2.13 Non - Tariff Income

The actual Non-Tariff Income of EDDD for FY 20-21 was Rs. 8.18 Crore as against Rs. 6.22 Crore approved by the Hon'ble Commission. The non-tariff income includes meter rent of Rs. 1.29 Crores, Miscellaneous Income of Rs. 6.89 Crores. The following table presents and approved and actual Non-Tariff Income of EDDD for the approval of the Hon'ble Commission.

Table 14: Non Tariff Income for FY 21-22

Particulars	(Rs. Crore.)		
	FY 21-22 Approved (23rd March, 2021)	FY 21-22 Approved (31st March, 2022)	FY 21-22 Actual
Non tariff Income	4.46	6.22	8.18

The EDDD, requests the Hon'ble Commission to approve the actual Non-Tariff Income for FY 21-22.

2.14 Incentive/Disincentive towards over/under achievement of norms of distribution losses

In the APR for FY 2020-21, the Commission had approved the T&D loss level of 6.50%. The EDDD has achieved T&D loss of 4.45% against the approved loss level of 6.50%. The EDDD, in accordance with Regulation 14.1 of the JERC MYT Regulations, 2018 (reproduced below) has determined the incentive towards the over-achievement of the target of Intra-State distribution loss for FY 2020-21 as follows:

"14.1 Approved aggregate gain to the Transmission Licensee or Distribution Licensee on account of controllable factors shall be shared equally between Licensee and Consumers:

Provided that the mechanism for sharing of gains or losses on account of controllable factors for a Generating Company shall be as specified in the prevalent CERC Tariff Regulations."

The incentive has been considered at INR 5.06/kWh, which is the Average Power Purchase cost (APPC) of the Petitioner. The APPC has been derived based on the Power Purchase cost approved in the true and correct manner of the Energy sales.



Table 15: Incentive due to over-achievement of Intra-State Distribution Loss target

Particulars	Approved	Actual
Retail Sales	2482.34	2482.34
T%D Loss (%)	6.50%	4.45%
Power Purchase at State Periphery	2654.90	2598.06
Gain/Loss (MU)		56.84
Average Power Purchase Cost		5.09
Gain/Loss (MU)		28.93
Sharing of 50% of gain with Petitioner		14.47

2.15 Aggregate Revenue Requirement for FY 21-22

Based on above expenses, table below summarizes actual Aggregate Revenue Requirement for FY 21-22 for EDDD vis-à-vis the ARR approved by the Hon'ble Commission in the previous two Tariff Orders.

Table 16: Aggregate Revenue Requirement for FY 21-22

Particulars	(Rs. Crore.)		
	FY 21-22 Approved (23rd March, 2021)	FY 21-22 Approved (31st March, 2022)	FY 21-22 Actual
Power Purchase Cost	1,179.06	1,241.16	1,263.40
O&M Expense	51.93	48.90	54.45
Depreciation	24.04	18.36	28.44
Interest Cost on Long-term Capital Loans	11.65	5.25	9.91
Interest on Working Capital Loans	12.68	11.14	12.09
Return on Equity	16.95	11.40	15.61
Provision for Bad Debt	0.00	0.00	0.00
Interest on security deposit	4.68	3.67	4.00
Incentive/Disincentive on achievement of norms	0.00	0.00	14.47
Less:			
Non-Tariff Income	4.46	6.22	8.18
Revenue from Surplus Power Sale	0.00		
Annual Revenue Requirement	1,296.53	1,333.66	1,394.20

The EDDD, requests the Hon'ble Commission to approve the ARR computed for FY 21-22.

2.16 Revenue for FY 21-22

During the FY 21-22, EDDD's actual revenue amounted to Rs. 1406.06 Crore (Including Rs. 203.74 Crore of FPPCA) as against Rs. 1273.67 Crore and Rs. 1290.17 Crore as



approved vide its Tariff Order dated 23rd March, 2021 and 31st March, 2022 respectively by the Hon'ble Commission.

Table 17: Revenue for FY 21-22

Particulars	(Rs. Crore.)		
	FY 21-22 Approved (23 rd March, 2021)	FY 21-22 Approved (31 st March, 2022)	FY 21-22 Actual
Revenue from sale of power	1,273.67	1,290.17	1,406.06
Total revenue	1273.67	1290.17	1,406.06

2.17 Revenue (Gap) / Surplus for FY 21-22

The Hon'ble Commission in Order dated 23rd March, 2021 has approved a total Aggregate Revenue Requirement (ARR) of Rs. 1296.53 Crore for FY 21-22. Further, the Commission has computed the revised ARR for FY 21-22 in the Order dated and 31st March, 2022 of Rs. 1333.66 Crore. Based on the annual accounts for FY 21-22 and the actual expenses incurred by the EDDD, the revised ARR for FY 2021-22 has been arrived at Rs. 1394.20 Crore.

This revised ARR is compared against the actual income highlighted in the previous section under various heads. Revenue realized from the existing tariff during the FY 2021-22 was Rs. 1406.06 Crore. Accordingly, total revenue surplus of EDDD for FY 21-22 is computed at Rs. 11.87 Crore as depicted in the Table below:

Table 18: Revenue (Gap)/surplus for FY 21-22

Particulars	(Rs. Crore.)	
	FY 21-22 Approved (31 st March, 2022)	FY 21-22 Actual
Annual Revenue Requirement (a)	1333.66	1394.20
Revenue from sale of power (b)	1290.17	1406.06
Revenue from open access (c)	0.00	0.00
Revenue (Gap)/Surplus (d=b+c-a)	(43.49)	11.87
Previous Years' (Gap)/Surplus Carried Over (e)	(12.79)	(12.79)
Carrying Cost (f)	(2.76)	(0.55)
Net Revenue (Gap)/surplus (g=d+e+f)	(59.04)	(1.47)

EDDD requests the Hon'ble Commission to approve afore-mentioned gap for FY 21-22.



Chapter 3: Review for the FY 2022-23

The review of aggregate revenue requirement for FY 22-23 is based on various cost elements like O&M expenses, interest cost and depreciation etc. This has been done based on actual data for six months and revised estimates for the remaining six months of FY 22-23. EDDD analysis in respect of items given below is discussed in the following paras:

a. Determination of Aggregate Revenue Requirement (ARR) by forecasting the following costs, other income & returns:

- i. Employee Cost
- ii. Repairs & Maintenance Cost
- iii. Admin & General Cost
- iv. Capital Investment Plan
- v. Interest Cost
- vi. Interest on Working Capital
- vii. Depreciation
- viii. Provision for bad & doubtful debts
- ix. Return on Equity
- x. Income Tax
- xi. Non-Tariff Income

3.1 Operation & Maintenance Costs

The revised estimated O&M cost for FY 22-23 is shown in the following Table:

Table 19: O&M Expense for FY 22-23

(Rs. Crore)

Particulars	FY 22-23		
	H1	H2	RE
Employee Cost	4.69	4.69	9.38
R&M	8.72	10.12	18.84
A&G	2.52	2.52	5.04
O&M Expenses	15.93	17.33	33.26

The EDDD has computed the employee cost, R&M expenses and A&G expenses as per the methodology given in the MYT Regulations, 2021 for the FY 2022-23. The actual expenses incurred during the first six months have been considered to estimate the costs for the remaining six months. The actual value of the O&M expenses for the FY



2022-23 shall be submitted to the Hon'ble Commission during the true up for the FY 2022-23.

The EDDD requests the Hon'ble Commission to approve the O&M expenses as submitted above for the FY 2022-23.

3.2 Capital Expenditure Plan

A summary of the capital expenditure and capitalization for FY 22-23 is summarized in Table below:

Table 20: Capital Expenditure & Capitalization for FY 22-23

Particulars	(Rs. Crore)
	FY 22-23 RE
Capital Expenditure	12.68
Capitalisation	12.68

It is requested to approve the capital expenditure and capitalization as submitted in the above table.

3.3 Gross Fixed Assets

EDDD had Opening Gross Fixed Assets (GFA) of Rs. 340.67 Crore in FY 22-23. Based on the capital expenditure and capitalization estimated above, assets amounting to Rs. 12.68 Crore have been estimated to be capitalized during FY 22-23.

A summary of the Opening and Closing GFA and capitalization for FY 22-23 vis-à-vis approved by the Commission has been summarized in Table below:

Table 21: Opening and Closing GFA for FY 22-23

Particulars	Opening GFA	Additions during the Year	(Rs. Crore)
			Closing GFA
FY 2022-23 (RE)	340.67	12.68	353.35



3.4 Depreciation

Depreciation is charged on the basis of straight-line method, on the Gross Fixed Assets in use at the beginning of the year and addition in assets during the financial year. The depreciation is based on the original cost of the Gross Fixed Assets.

EDDD has applied the depreciation rates as specified in the CERC (terms and Conditions of Tariff) Regulations, 2019.

Table 22: Depreciation rate specified in the CERC Regulations, 2019

Asset Category	Depreciation Rate %
Plant & Machinery	5.28%
Buildings	3.34%
Vehicles	9.50%
Furniture & Fixtures	6.33%
Computers & Others	6.33%
Land	0.00%

Depreciation for the FY 22-23 is determined by applying aforesaid category-wise assets depreciation rates on the opening balance of Gross Fixed assets and average of the addition during the year projected for FY 22-23. The Table below summarizes the asset-wise depreciation vis-à-vis approved by the Commission and computed by EDDD:

Table 23: Depreciation for FY 22-23

Particulars	(Rs. Crore)
	FY 22-23 RE
Opening GFA	340.67
Addition during the year	12.68
Closing GFA	353.35
Average GFA	347.01
Depreciation during the year	16.57

3.5 Interest & Financial Costs

3.5.1 Interest on Long-term / Capital Loans

Assets capitalized during the FY 2022-23 have been considered based on normative debt-equity ratio of 70:30 as per the as per the JERC (Multi Year Distribution Tariff) Regulations, 2021. The Hon'ble Commission had approved the closing loan for the FY



2021-22 at Rs. 123.35 Crores. Further, the closing GFA for the FY 2021-22 was Rs. 585.41 Crores. However, the distribution business of EDDD has been privatized and the corresponding assets have been transferred to the new distribution utility. After transferring the distribution assets, the opening GFA of EDDD for the FY 2022-23 is Rs. 336.89 Crores. Hence, the opening loan has been considered as per the finalized in the gazette notification of the Transfer Scheme, 2021 of the DNHDDPCL and EDDD. The opening loan thus considered for FY 2022-23 is Rs. 71.77 Crores.

Interest rate of 8.00% has been considered for computation of interest cost for long-term loans which is similar to the 1 year SBI MCLR plus 100 basis points. The revised estimates of the normative interest on long-term/capital loans is shown in the Table below:

Table 24: Interest on Long-term/Capital Loans for FY 22-23

(Rs. Crore)	
Particulars	FY 22-23 RE
Opening Loan	71.77
Loan for additional Capex (70:30 debt-equity)	8.88
Loan Repayment	16.57
Closing Loan	64.08
Interest Cost on Avg. Loans	5.43

EDDD requests the Hon'ble Commission to approve the interest cost on long-term loans as projected above.

3.5.2 Interest on Working Capital Borrowings

EDDD has computed the Interest on Working Capital for the FY 2022-23 based on normative basis as per the JERC (Multi Year Distribution Tariff) Regulations, 2021. Clause no. 43.1 of the MYT regulations states the following:

"The Transmission Licensee shall be allowed interest on the estimated level of working capital for the Financial Year computed in accordance with prevalent CERC Tariff Regulations."

Further, Regulation 34 (C) of the CERC (Terms and Conditions of Tariff) Regulations, 2019 specifies:

"34. Interest on Working Capital: (1) The working capital shall cover:

.....

(c) For Hydro Generating Station (including Pumped Storage Hydro Generating Station) and Transmission System:



- (i) Receivables equivalent to 45 days of annual fixed cost;
- (ii) Maintenance spares @ 15% of operation and maintenance expenses including security expenses; and
- (iii) Operation and maintenance expenses, including security expenses for one month."

A rate of interest of 9.00% has been considered on the working capital requirement, being the 1 year SBI MCLR plus 200 basis points. This is in line with the JERC (Multi Year Distribution Tariff) Regulations, 2021 which states that "The rate of interest on working capital shall be equal one (1) Year State Bank of India (SBI) MCLR / any replacement thereof as notified by RBI for the time being in effect applicable for one (1) Year period, as may be applicable as on 1st April of the Financial Year in which the Petition is filed plus 200 basis points."

The normative interest on working capital for FY 22-23 considering the above methodology is summarized in the Table below:

Table 25: Interest on Working Capital for FY 22-23

(Rs. Crore)	
Particulars	FY 22-23 RE
Receivables equivalent to 45 days fixed cost	7.58
Maintenance spares @15% of operation and maintenance expenses	2.39
Operation and Maintenance expenses for one month	1.33
Total Working Capital requirement	11.30
Interest on Working Capital	1.02

3.6 Return on Equity

As per the JERC (Multi Year Distribution Tariff) Regulations, 2021, EDDD is entitled for a Return on Equity (RoE).

The Regulation 28.1 of the MYT Regulations, 2021 stipulates the following:

"28.1 Return on equity shall be computed on the paid up equity capital determined in accordance with Regulation 27 for the assets put to use for the Transmission Licensee and shall be allowed in accordance with the prevalent CERC Tariff Regulations for transmission system."

Further, the Regulation 30 (2) of the CERC (Terms and Conditions of Tariff) Regulations, 2019, states that:



“(2) Return on equity shall be computed at the base rate of 15.50% for thermal generating station, transmission system including communication system and run-of river hydro generating station, and at the base rate of 16.50% for the storage type hydro generating stations including pumped storage hydro generating stations and run-of river generating station with pondage:

.....”

A normative debt-equity ratio of 70:30 is considered on the assets capitalized during the FY 2022-23 as per the MYT Regulations, 2021.

Hence, a normative equity on the assets is considered and claimed the RoE of 15.50% for FY 2022-23 in this Petition.

The Hon’ble Commission had approved the closing equity for the FY 2021-22 at Rs. 106.28 Crores. Further, the closing GFA for the FY 2021-22 was Rs. 585.41 Crores. However, the distribution business of EDDD has been privatized and the corresponding assets have been transferred to the new distribution utility. After transferring the distribution assets, the opening GFA of EDDD for the FY 2022-23 is Rs. 336.89 Crores. Hence, the opening equity has been considered as per the finalized in the gazette notification of the Transfer Scheme, 2021 of the DNHDDPCL and EDDD. The opening equity thus considered for FY 2022-23 is Rs. 32.86 Crores.

The Return on Equity as submitted is shown in the Table below:

Table 26: Return on Equity for FY 22-23

Particulars	(Rs. Crore) FY 22-23 RE
Opening Equity	32.86
Addition in equity on account of new capitalization	3.80
Closing Equity	36.66
Average Equity	34.76
Return on Equity (%)	15.50%
Return on Equity	5.39

The EDDD, requests the Hon’ble Commission to approve the return on capital base computed for FY 22-23.



3.7 Non-Tariff & Other Income

The non-tariff income for FY 2022-23 has been estimated by considering elements like tender fees etc. Details of the non-tariff income is provided in table below:

Table 27: Non-tariff Income for FY 22-23

(Rs. Crore)	
Particulars	FY 22-23 RE
Tender Fees	0.16
Non tariff Income	0.16

3.8 Aggregate Revenue Requirement

The following Table summarizes EDDD's Aggregate Revenue Requirement for FY 22-23.

Table 28: Aggregate Revenue Requirement for FY 22-23

(Rs. Crore)	
Particulars	FY 22-23 RE
O&M Expense	33.26
Depreciation	16.57
Interest Cost on Long-term Capital Loans	5.43
Interest on Working Capital Loans	1.02
Return on Equity	5.39
Total	61.67
Less:	
Non-Tariff Income	0.16
Annual Revenue Requirement	61.51

3.9 Revenue from Existing Tariff

During the FY 22-23, it is estimated that EDDD's revenue will be Rs. 69.72 Crore.

The Table below summarizes the revenue for FY 22-23:

Table 29: Revenue for FY 22-23

(Rs. Crore)	
Particulars	FY 22-23 RE
Revenue from operations	69.72
Total Revenue	69.72



3.10 Coverage of Revenue Gap

As part of the review of FY 2022-23 EDDD has arrived at the Aggregate Revenue Requirement of Rs. 61.51 Crore.

This revised Aggregate Revenue Requirement is compared against the income with existing tariff. Accordingly, total revenue surplus of EDDD for FY 22-23 is computed at Rs. 8.21 Crore as depicted in the Table below:

Table 30: Revenue Gap/Surplus for FY 22-23

(Rs. Crore)

Particulars	FY 22-23 RE
Annual Revenue Requirement (a)	61.51
Revenue from sale of power (b)	69.72
Revenue (Gap)/surplus (c=b-a)	8.21
Previous Years' (Gap)/Surplus Carried Over (d)	(1.47)
Carrying Cost (e)	0.20
Net Revenue (Gap)/surplus (f=c+d+e)	6.94

EDDD requests the Hon'ble Commission to approve afore-mentioned gap for FY 22-23.



Chapter 4: ARR for the FY 2023-24

EDDD is submitting its ARR for the FY 2023-24 broadly on the basis of the principles outlined in MYT Tariff Regulations notified by JERC. EDDD has considered the past trends and taken cognizance of other internal and external developments to estimate the likely performance for the FY 2023-24.

The following sections explain in detail the basis and forecasts of the following elements for the MYT Control Period.

- a. Determination of Aggregate Revenue Requirement by forecasting the following costs, other income & returns:

- i. Employee Cost
- ii. Repairs & Maintenance Cost
- iii. Administration & General Expenses
- iv. Capital Investment Plan
- v. Interest Cost
- vi. Interest on Working Capital
- vii. Depreciation
- viii. Provision for bad & doubtful debts
- ix. Return on Equity
- x. Non-Tariff Income

- b. Determination of Gap between Revenue & Costs and the arrangements to cover the revenue gap for the FY 2023-24.

4.1 Operation & Maintenance Costs

1. Operation and Maintenance expenses comprise of the following heads:

- **Employees Expenses** which includes the basic pay, dearness pay, dearness allowances, house rent allowances, and other allowances paid to the staff;
- **Repair and Maintenance (R&M) Expenses**, which include all expenditure incurred on the maintenance and upkeep of transmission and distribution assets; and
- **Administrative and General Expenses**, which include all expenditure incurred in operating a business such as telephone charges, consultancy and regulatory fee etc.



2. The methodology adopted by EDDD for projecting the values of each component of the O&M expense for the FY 2023-24 has been explained in the following section.

4.1.1 Employee Expense

1. The Employee expense estimated by the Petitioner comprise of all costs related to employees like basic salary, dearness allowances, medical expenses, leave travel allowances, honorarium, etc. But the Petitioner does not maintain cost related to leave salary contribution, pension and terminal benefits of the employee in the employee cost. Therefore, the Petitioner will claim these expenses relating to the employee cost at an appropriate time when the respective cost items become payable.
2. Based on the various expense head related to employee booked during six months of FY 22-23 EDDD has estimated the total employee cost for full year of FY 22-23 as Rs. 9.38 Crore. Salary expenses for the FY 2023-24 is estimated based on the average increase in the Consumer Price Index (CPI) for immediately preceding three years. The average CPI for the last three years is 6.33%.
3. As per the MYT Regulations, 2021, the employees' expenses have been calculated as per the following formulae:

$$EMP_n = (EMP_{n-1}) \times (1+G_n) \times (CPI_{inflation})$$

where:

EMP_n – Employee expenses of the Distribution Licensee for the nth Year;

G_n is a growth factor for the nth Year. Value of G_n shall be determined by the Commission for each Year in the Multi Year Tariff Order for meeting the additional manpower requirement based on Licensee's filings, benchmarking, approved cost by the Commission in past and any other factor that the Commission feels appropriate:

CPI inflation: is the average increase in Consumer Price Index (CPI) for immediately preceding three (3) Years before the base Year;

4. The average growth in the CPI for the last three years is 6.33%. Total employee cost of EDDD for the FY 2023-24 is as given in the table below:

Table 31: Employee Expenses

Particulars	(Rs. Crore)
	FY 23-24
	Projected

Particulars	FY 23-24
Employee Cost	9.95

5. EDDD submits to the Hon'ble Commission to approve the employee costs as projected by the Petitioner.

4.1.2 Repairs & Maintenance Expense

1. Repairs and maintenance expense comprise of expenses incurred by the Petitioner with regard to maintenance and upkeep of the transmission system. Adequate R&M activities help in reduction of transmission and distribution losses and breakdowns in the system.

2. The estimated R&M expense for FY 2022-23 is Rs. 18.84 Crore.

3. As per the JERC Tariff Regulations the R&M expenses shall be calculated as percentage (as per the norm defined) of Opening Gross Fixed Assets for the year governed by following formula:

$$R\&M_n = K \times GFA_{n-1} \times (WPI \text{ inflation})$$

where:

R&M_n - Repair and Maintenance expenses of the Distribution Licensee for the nth Year;

GFA_{n-1} - Gross Fixed Asset of the transmission Licensee for the n-1th Year;

'K' is a constant (expressed in %). Value of K for each Year of the Control Period shall be determined by the Commission in the Multi Year Tariff Order based on Licensee's filing, benchmarking of repair and maintenance expenses, approved repair and maintenance expenses vis-à-vis GFA approved by the Commission in past and any other factor considered appropriate by the Commission;

GFA : Gross Fixed Assets at the beginning of the Financial Year

WPI inflation - is the average increase in the Wholesale Price Index (WPI) for immediately preceding three (3) Years before the base Year;

4. For projecting the R&M expense for the MYT Control Period, the EDDD has considered the WPI inflation as 2.54%. Total repair & maintenance cost of EDDD for the FY 2023-24 is summarized in the table below:

Table 32: Repairs & Maintenance Expense

Particulars	(Rs. Crore) FY 23-24 Projected
R&M	20.04



5. The EDDD also requests the Hon'ble Commission to include the following activities as part of Energy Efficiency measures under the R&M Expenses:

- Energy conservation program and workshops
- Publicity and awareness material
- Implementation of demonstration projects
- State Energy Conservation Fund related activities
- Other energy efficiency related activities as per guidelines of SDA and BEE.

We may propose to have yearly requirement of Rs. 1 crore for Daman and Rs. 50 Lakh for Diu.

6. EDDD requests the Commission to approve the R&M expense without any disallowances as the same is necessary for proper maintenance and strengthening of the system and quality of supply in the region in order to ensure consumer satisfaction. Further, Commission should consider the fact that price of most of the basic commodities like iron, copper, zinc and cement used in the repairs and maintenance has increased tremendously over the last 5 years.

4.1.3 Administration & General Expense

1. Administrative and General (A&G) expenses comprise of various expenses as given below:

- Rent
- Rates and taxes
- Travel and conveyance expenses
- Consultancy and regulatory fees
- Energy auditing fee and consumer indexing
- Insurance and other administration expenses
- Compensation towards accidents etc.

2. The estimated A&G expense for FY 22-23 is Rs.5.04 Crore.

3. For projecting the A&G expenses for the FY 2023-24 the following formula has been used as given in the MYT Regulations:

$$A\&G_n = (A\&G_{n-1}) \times (CPI_{inflation})$$

where:

A&G_n – Administrative and General expenses of the Distribution Licensee for the nth Year;



CPIinflation - is the average increase in Consumer Price Index (CPI) for immediately preceding three (3) Years before the base Year;

The A&G expenses projected for the FY 2023-24 have been given in the table below:

Table 33: A&G Expense

Particulars	(Rs. Crore)
	FY 23-24 Projected
A&G	5.34

4. The Regulatory & Consultancy expenses for the FY 2023-24 has been projected as per the existing agreements, contracts with the consultants and the best estimates for the future regulatory and consultancy works.
5. In line with the above, the Hon'ble Commission is requested to approve the A&G costs without any disallowance.

4.1.4 Total Operation and Maintenance Expense

Based on the employee cost, R&M and A&G expense projected above, the total O&M expenditure for is summarized in table below.

Table 34: Total O&M Expense

Particulars	(Rs. Crore.)
	FY 23-24 Projected
Employee Cost	9.95
R&M	20.04
A&G	5.34
O&M Expenses	35.34

The EDDD requests the Hon'ble Commission to approve the O&M expense as projected above.

4.2 Capital Expenditure Plan

1. As has been discussed above, the (EDDD) is engaged in the transmission of electricity in Daman and Diu.
2. The scheme wise capital expenditure plan for the FY 2023-24 is given in the table below:



Table 35: Capital Expenditure for the FY 2023-24

(Rs. Crore.)

Sr.No.	Name of Scheme	Proposed Expenditure		
		Total Scheme Amount	2022-23	2023-24
1	Scheme for establishment of 2x100 MVA, 220/66 KV GIS Sub-station at Dabhel, Daman alongwith associated 220 KV multicircuit Magarwada-Dabhel transmission line via Kachigam	49.60	0.00	20.00
2	Scheme for establishment of 66/11 KV, 2x20 MVA GIS Sub-station alongwith associated line at Dabhel, Daman	31.52	0.00	20.00
3	Scheme for establishment of 66/11 KV GIS Sub-station at Bhimpore, Daman	32.58	0.00	16.00
4	Establishment of new hybrid bays at Dalwada Sub-station (2 Nos.) and Zari Sub-station (2 Nos.), Daman	3.19	0.00	3.19
5	Scheme for inter connection of 66 KV line from Zari Sub-station to Eurocoustic and replacement of Panther conductor from Kachigam Sub-station to EPL	6.36	0.00	6.36
6	Scheme for shifting and commissioning of newly procured/existing equipment in the newly constructed control room building near existing 66 KV Sub station at Dalwada and Dabhel Sub station	14.00	0.00	7.00
7	Scheme for replacement and enhancement of capacity of 4 nos. of 66/11 KV Power Transformers from 10 MVA to 20 MVA at 66/11 kV Dabel, Ringadwada, Varkund and Bhimpore sub-stations in Daman	12.68	12.68	0.00
8	Project for addition of new 11 KV VCB panels in 66/11 KV Dalwada and Bhimpore sub-station	3.50	0.00	3.50



Sr.No.	Name of Scheme	Proposed Expenditure		
		Total Scheme Amount	2022-23	2023-24
9	project for replacement and enhancement of capacity of 3 nos. of Power transformers from 15 MVA to 20 MVA at 66/11 KV Dalwada sub-station	10.00	0.00	10.00
10	Project for replacement and enhancement of capacity of 3 nos. of power transformers from 15 MVA to 20 MVA at 66/11 KV Dhabel sub-station	10.00	0.00	10.00
11	Project for retrofitting of numerical and auxiliary protection relays and formation of new relay based sub-station automation system (SCADA) at various 66/11 KV sub-stations in Daman and Diu.	4.00	0.00	4.00
Total		177.43	12.68	100.05

- The EDDD requests the Hon'ble Commission to approve the capital expenditure against the scheme as submitted herewith.
- A summary of the capital expenditure and capitalization for the FY 2023-24 is summarized in Table below:

Table 36: Capital Expenditure & Capitalization for the FY 2023-24

Particulars	(Rs. Crore)
	FY 23-24 Projected
Capital Expenditure	100.05
Capitalisation	37.05

- The EDDD requests the Hon'ble Commission to approve the capital expenditure and capitalization as projected above.

4.3 Gross Fixed Assets

- EDDD had Rs. 340.67 Crore of Opening Gross Fixed Assets (GFA) in FY 22-23. Assets amounting to Rs. 12.68 Crore have been estimated to be added to the GFA during the FY 2022-23.



2. Similarly, based on the capital expenditure plan as detailed above, Rs. 37.05 Crore, is proposed to be capitalized during the FY 2023-24.
3. A summary of the Opening and Closing GFA and capitalization has been summarized in table below:

Table 37: Opening and Closing GFA for the FY 2023-24

(Rs. Crore)			
Particulars	Opening GFA	Additions during the Year	Closing GFA
FY 2023-24	353.35	37.05	390.40

4. The EDDD requests the Hon'ble Commission to approve the GFA as projected above.

4.4 Depreciation

1. Depreciation is charged on the basis of straight-line method, on the GFA in use at the beginning of the year and addition in assets during the financial year. The depreciation is based on the original cost of the Gross Fixed Assets.
2. EDDD has applied the depreciation rates as specified in the CERC MYT Regulations, 2019.
3. Depreciation for the MYT Control Period is determined by applying aforesaid category-wise assets depreciation rates on the opening balance of Gross Fixed assets and average of the addition during the FY 2023-24. The EDDD would like to submit to the Hon'ble Commission that it has computed the depreciation based on the closing value of GFA for FY 2022-23 and the estimated capitalization for the FY 2023-24.
4. Therefore, the EDDD requests the Hon'ble Commission to approve the depreciation as given in the table below:

Table 38: Depreciation

(Rs. Crore)	
Particulars	FY 23-24 Projected
Opening GFA	353.35
Addition during the year	37.05
Closing GFA	390.40
Average GFA	371.87



Particulars	FY 23-24
Depreciation during the year	17.88

5. The EDDD requests the Hon'ble Commission to approve the depreciation as projected above.

4.5 Interest & Finance Costs

4.5.1 Interest on Long-term/ Capital Loans

1. The entire capital expenditure of EDDD since its inception has been funded by the Central Government through budgetary support each year. Therefore, the department does not have any loan liabilities.
2. However, EDDD is now migrating from a Government owned utility to a commercial utility under the Electricity Act, 2003, it has come under the direction of the Joint Electricity Regulatory Commission. It has been assumed that EDDD would work as a separate commercial utility and therefore would be utilizing the debt facilities in the coming years.
3. Assets capitalized during the MYT Control Period have been considered based on normative debt-equity ratio of 70:30 as per the MYT Regulations, 2021.
4. Interest rate of 8.00% has been considered for computation of interest cost for long-term loans which is similar to the prevailing 1 year SBI MCLR plus 100 basis points. Details of the loan amounts and interest cost computed for FY 2023-24 is summarized in Table below:

Table 39: Total Interest on Long-term Loans

Particulars	(Rs. Crore) FY 23-24 Projected
Opening Loan	64.07
Loan for additional Capex (70:30 debt-equity)	25.94
Loan Repayment	17.88
Closing Loan	72.13
Interest Cost on Avg. Loans	5.45

5. The EDDD requests the Hon'ble Commission to approve the interest on long-term capital loans as given in the table above.



4.5.2 Interest on Working Capital Borrowings

- 1 EDDD has computed the Interest on Working Capital for the MYT Control Period is based on normative basis as per the MYT Regulations, 2021.
 - 2 Clause no. 43.1 of the MYT regulations states the following:
 "The Transmission Licensee shall be allowed interest on the estimated level of working capital for the Financial Year computed in accordance with prevalent CERC Tariff Regulations."
- Further, Regulation 34 (C) of the CERC (Terms and Conditions of Tariff) Regulations, 2019 specifies:
- (c) For Hydro Generating Station (including Pumped Storage Hydro Generating Station) and Transmission System:
- i. Receivables equivalent to 45 days of annual fixed cost;
 - ii. Maintenance spares @ 15% of operation and maintenance expenses including security expenses
 - iii. Operation and maintenance expenses, including security expenses for one month
- 3 A rate of interest of 9.00% has been considered on the working capital requirement, being the 1 year SBI MCLR as on 1st April of the year plus 200 basis points. This is in line with the MYT Regulations, 2018 which states that "The rate of interest on working capital shall be equal one (1) Year State Bank of India (SBI) MCLR / any replacement thereof as notified by RBI for the time being in effect applicable for one (1) Year period, as may be applicable as on 1st April of the Financial Year in which the Petition is filed plus 200 basis points."
 - 4 The normative interest on working capital for the FY 2023-24 considering the above methodology is summarized in the Table below:

Table 40: Interest on Working Capital for the FY 2023-24

Particulars	(Rs. Crore)
	FY 23-24 Projected
Receivables equivalent to 45 days fixed cost	8.20
Maintenance spares @15% of operation and maintenance expenses	5.30
Operation and Maintenance expenses for one month	2.94
Total Working Capital requirement	16.45
Interest on Working Capital	1.48



- 5 The EDDD requests the Hon'ble Commission to approve the interest on working capital as given above.

4.6 Return on Equity

- As per the JERC (Multi Year Distribution Tariff) Regulations, 2021, EDDD is entitled for a Return on Equity (RoE).
- The Regulation 28.1 of the MYT Regulations, 2021 stipulates the following:
 "28.1 Return on equity shall be computed on the paid up equity capital determined in accordance with Regulation 27 for the assets put to use for the Transmission Licensee and shall be allowed in accordance with the prevalent CERC Tariff Regulations for transmission system."

Further, the Regulation 30 (2) of the CERC (Terms and Conditions of Tariff) Regulations, 2019, states that:

"(2) Return on equity shall be computed at the base rate of 15.50% for thermal generating station, transmission system including communication system and run-of river hydro generating station, and at the base rate of 16.50% for the storage type hydro generating stations including pumped storage hydro generating stations and run-of river generating station with pondage:
 " (Emphasis supplied)

- The equity component has been determined in accordance with Regulation 27 of the MYT Regulations. Assets proposed to be capitalized during the FY 2023-24 have been considered based on normative debt-equity ratio of 70:30 as per the MYT Regulations, 2021. The following table provides the ROE for the FY 2023-24:

Table 41: Proposed Return on Equity

Particulars	(Rs. Crore)
	FY 23-24 Projected
Opening Equity	36.66
Addition in equity on account of new capitalization	11.12
Closing Equity	47.78
Average Equity	42.22
Return on Equity (%)	15.50%
Return on Equity	6.54

- The EDDD requests the Hon'ble Commission to approve the return on equity as given above.



4.7 Non-Tariff & Other Income

1. Non-tariff income includes elements like tender fees etc.
2. For projecting the non-tariff income for the FY 2023-24, an increase of 5% p.a. has been considered over the estimated non-tariff income for FY 22-23. Details of the non-tariff income for the FY 2023-24 is provided in table below:

Table 42: Non-tariff Income

Particulars	(Rs. Crore)
	FY 23-24 Projected
Tender Fees	0.17
Non tariff Income	0.17

3. The EDDD requests the Hon'ble Commission to approve the return on equity as given above.

4.8 Aggregate Revenue Requirement

1. Table 43 summarizes EDDD's Aggregate Revenue Requirement for FY 2023-24.

Table 43: Aggregate Revenue Requirement

Particulars	(Rs. Crore)
	FY 23-24 Projected
O&M Expense	35.34
Depreciation	17.88
Interest Cost on Long-term Capital Loans	5.45
Interest on Working Capital Loans	1.48
Return on Equity	6.54
Total	66.69
Less:	
Non-Tariff Income	0.17
Annual Revenue Requirement	66.52

4.9 Coverage of Revenue Gap

1. Table 44 summarizes the ARR for EDDD for FY 2021-22, FY 2022-23 and FY 2023-24 along with the revenue and the resulting revenue (gap)/surplus. The cumulative revenue gap for the three years is Rs. 59.58 Crores as given in the table below.



Table 44: Revenue Gap for FY 2023-24

Sr. No.	Particulars	(Rs. Crore.)		
		FY 21-22 Actual	FY 22-23 RE	FY23-24 Projected
1	Total ARR	1,394.20	61.51	66.52
2	Revenue @ Existing Tariff	1,406.06	69.72	0.00
3	Total Revenue	1,406.06	69.72	0.00
4	Revenue (Gap) /Surplus(3-1)	11.87	8.21	(66.52)
	Covered By			
5	Previous Years' (Gap)/Surplus Carried Over	(12.79)	(1.47)	6.94
6	Revenue (Gap) /Surplus(4+5)	(0.92)	6.73	(59.58)
7	Carrying Cost	(0.55)	0.21	-
8	Total (Gap)/Surplus for three years(6+7)	(1.47)	6.94	(59.58)

2. It is evident from Table 44 that there is a cumulative revenue gap of Rs. 59.58 Crore at the end of FY 2023-24. Further, there is a standalone revenue gap of Rs. 66.52 Crores during the FY 2023-24.



Chapter 5: Tariff Determination for FY 2023-24

Electricity Department, Daman and Diu considers power tariff as a sensitive subject having substantial impact on social, economic and financial well-being of the State as well as the viability and growth of power sector. The transmission tariff has been determined based upon the energy transmitted through the system, aggregate revenue requirement.

5.1 Determination of the transmission capacity of the system

The transmission system capacity is the contracted capacity made available to the beneficiary during the given period. The present capacity of Magarwada substation is 520 MVA and the present capacity of Ringanwada substation is 260 MVA. Further, the present capacity of Malala substation at Diu is 20 MVA. The contracted transmission capacity of the system is as under:

Table 45: Transmission Capacity of the Transmission System

Tariff Determination	FY 22-23	FY 23-24
Transmission Capacity (MW)	792	792

5.2 Tariff Determination

Based upon the projected capacity of the transmission capacity, the tariff is determined as follows:

Table 46: Tariff Determination

Tariff Determination	FY 23-24
Aggregate revenue requirement (Rs. Crore)	59.58
Transmission Capacity (MW)	792
Long/Medium Term Transmission charges (Rs./MW/Month)	62,693.95
Short Term Open Access Transmission charges (Rs./MW/Day)	2,061.17



5.3 Open Access

Granting of open access in the UT of Dadra and Nagar Haveli and Daman and Diu is determined by the Joint Electricity Regulatory Commission for the state of Goa and Union Territories (Connectivity and open access in Intra-State Transmission and Distribution) Regulations, 2017. Clause no. 2.1 of the Regulations state as follows:

2.1 Phasing of Open Access

1. Open Access shall be allowed to all Consumers where the maximum power to be made available at any time exceeds the threshold level of 1 MVA subject to the satisfaction of the conditions contained in these Regulations:

Provided that the Commission may allow Open Access to Consumers seeking Open Access for capacity less than 1 MVA through a separate Order at such time as it may consider feasible having regard to operational constraints and other factors.

Further, section 40 of the Electricity Act, 2003 states as follows:

Duties of the Transmission Licensees

40. It shall be the duty of a transmission licensee –

- (c) to provide non-discriminatory open access to its transmission system for use by-
 - (i) any licensee or generating company on payment of the transmission charges; or
 - (ii) any consumer as and when such open access is provided by the State Commission under sub-section (2) of section 42, on payment of the transmission charges and a surcharge thereon, as may be specified by the State Commission:

In view of the above regulations, it is requested that the Hon'ble Commission may allow open access for capacity less than 1 MVA without seeking any separate order for the same from the Commission.



Chapter 6: Directives

The Hon'ble Commission vide Tariff Order dated 23rd March, 2021 had issued a set of directives to be followed by EDDD to comply with the "The Joint Electricity Regulatory Commission for the State of Goa and Union Territories (Multi Year Distribution Tariff) Regulations, 2018."

In line with the directives, EDDD has been taken several steps to comply with the directives. The purpose of this section is to appraise the Hon'ble Commission on progress made by EDDD on this matter since the issuance of the aforesaid tariff order.

A. Directives continued in this Order

1. Directive 1: Assets created from consumer contribution

The Petitioner has failed to submit the details of assets created through consumer contribution, if any. The Petitioner is not entitled to get depreciation on these assets. The Commission has currently considered the entire GFA towards depreciation and will reduce the depreciation in future, once the details of the consumer contribution are made available. The Commission directs the Petitioner to submit detailed scheme wise consumer contributions, the impact of which shall be accounted by Commission in future Tariff Orders.

Petitioner's Submission

The EDDD would like to submit that the details of assets created from consumer contribution shall be submitted to the Hon'ble Commission shortly.

Commission's Response

The Commission has noted with concern that Petitioner is yet to submit the details of assets created from consumer contribution. The absence of this data constraints the Commission in fair determination of average cost of supply and tariff. The Commission directs the petitioner to submit the data pertaining to the assets created from consumer contribution along with the Tariff petition for determination of retail Tariff for FY 2020-21.

Petitioner's Submission

The EDDD would like to submit to the Hon'ble Commission that the assets created out of consumer contribution are not included in the asset register being prepared by the Department for the FY 2018-19. Further, the depreciation on the assets created out of consumer contribution is not included in the ARR being filed by the Department for determination of Tariff.



Commission's Response

The Commission has noted that the Petitioner has submitted that the assets created out of consumer contribution are not included in the asset register being prepared by the Department for FY 2018-19 but as per Commissions direction petitioner has still failed to submit the details of assets created through consumer contribution, if any. The Petitioner is not entitled to get depreciation on these assets. The Commission has currently considered the entire GFA towards depreciation and will reduce the depreciation in future, once the details of the consumer contribution are made available. The Commission directs the Petitioner to submit detailed scheme wise consumer contributions, the impact of which shall be accounted by the Commission in future Tariff Orders.

Petitioner's Submission

The EDDD would like to submit that the assets created out of consumer contribution are not included in the asset register prepared for FY 2019-20. Further, the EDDD is not claiming any depreciation on the assets created out of consumer contribution in the ARR petition.

Commission's Response

The Commission in the directive to petitioner in Tariff Order dated May 18th 2020 noted that the Petitioner has submitted that the assets created out of consumer contribution is not included in the asset register being prepared by the Department for FY 2018-19.

However as per Commissions directions, the petitioner has again failed to submit the details of assets created through consumer contribution, if any. The Petitioner is not entitled to get depreciation on these assets. The Commission has currently considered the entire GFA towards depreciation and will reduce the depreciation in future, once the details of the consumer contribution are made available. The Commission directs the Petitioner to submit detailed scheme wise consumer contributions, the impact of which shall be accounted by the Commission in future Tariff Orders.

Petitioner's Submission

The EDDD would like to submit that the assets created out of consumer contribution are not included in the asset register prepared for FY 2020-21. Further, the EDDD is not claiming any depreciation on the assets created out of consumer contribution in the ARR petition.

Commission's Response

The Commission directs the Petitioner to submit detailed scheme wise consumer contributions, the impact of which shall be accounted by the Commission in future Tariff Orders.



Petitioner's Submission

The EDDD would like to submit that the assets created out of consumer contribution are not included in the asset register prepared for FY 2021-22. Further, the EDDD is not claiming any depreciation on the assets created out of consumer contribution in the ARR petition.

2. Directive 2: Creation of SLDC

Currently the functions of scheduling of power is being performed by the ED DD itself. The Commission directs the Petitioner to form a separate SLDC which is ring fenced from the ED DD. The Petitioner is directed to employ employees dedicated to the SLDC operations, which are independent from the ED DD.

Petitioner's Submission

Electricity Department would like to submit that, presently Department acts as a vertically integrated entity, looking after transmission, distribution, and system operation. However, as per the direction of Hon'ble Commission, ring-fencing has been initiated for SLDC operation. Till now, we have implemented following,

- Head of the SLDC is nominated
- Necessary staff to SLDC has been provided for independent operation
- Budget of SLDC is separately provided by Administration.

Commission's Response

The Commission appreciates the efforts of the Petitioner towards creating an independent SLDC. The Commission directs the Petitioner to expedite the process of creation of separate SLDC and submit a detailed implementation plan for the same within 3 months of the issuance of this Order.

Petitioner's Submission

The EDDD would like to submit that the Department has provided a separate infrastructure for the functioning of the SLDC.

Commission's Response

The Commission has noted with concern that Petitioner has not submit any report regarding detailed implementation plan to expedite the process of creation of separate SLDC. The Commission directs the petitioner to submit the detailed implementation plan along with the current status in regard to the creation of separate SLDC within 3 months of the issuance of this Order.



Petitioner's Submission

The EDDD would like to submit that the Department is functioning as a vertically integrated utility and looks after the transmission and distribution functions. However, the EDDD has provided a separate head for SLDC along with necessary staff and also the budgetary allocation has been done separately for the functioning of SLDC.

Commission's Response

The Commission appreciates the efforts of the Petitioner towards creating an independent SLDC. The Commission directs the Petitioner to expedite the process of creation of separate SLDC and submit a detailed implementation plan for the same within 3 months of the issuance of this Order.

Petitioner's Submission

The EDDD would like to submit that presently the UT of Dadra and Nagar Haveli and UT of Daman and Diu have merged into a single UT. The Competent Authority is yet to decide the location of the SLDC and other related matters of the merged UT. Hence, the process of creation of separate SLDC other matters shall be initiated once decision regarding the SLDC is taken by the Competent Authority.

Commission's Response

The Commission appreciates the efforts of the Petitioner towards creating an independent SLDC. The Commission directs the Petitioner to expedite the process of creation of separate SLDC after finalizing the location of SLDC and resolving other miscellaneous issues and submit a detailed implementation plan for the same within 3 months of the issuance of this Order.

Petitioner's Submission

The EDDD would like to submit that the SLDC of both the regions i.e. Dadra and Nagar Haveli and Daman and Diu have been merged and the head office of the same has been located at Silvassa. Further, a sub SLDC has been formed at Daman.

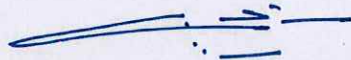


Prayer

1. EDDD requests the Hon'ble Commission to:

- Admit the Aggregate Revenue Requirement for the FY 2023-24 as submitted herewith as well as the revised estimates for FY 2022-23.
- Admit and approve the Trued up ARR for FY 2021-22.
- Approve the tariff as proposed by the EDDD under Table no. 44.
- Condone any inadvertent omissions/ errors/ shortcomings and permit the Petitioner to add/ change/ modify/ alter this filing and make further submissions as may be required at a future date.
- Submit necessary additional information required by the Commission during the processing of this petition.
- And pass such other and further orders as are deemed fit and proper in the facts and circumstances of the case.

BY THE APPLICANT THROUGH



PETITIONER

Electricity Department Daman and Diu

Daman

Dated: