

MTR Petition for Truing up for
Aggregate Revenue Requirement (ARR)
and Revenue for FY 2019-20, FY 2020-
21 & FY 2021-22, Provisional Truing up
for FY 2022-23, and Revised Projections
for FY 2023-24 & FY 2024-25

Executive Summary



**Brihanmumbai Electric Supply & Transport
Undertaking
(of the Brihanmumbai Mahanagarpalika)**

Volume II of IV

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List of Abbreviations

Abbreviation	Full Form
ABR	Average Billing Rate
ARR	Aggregate Revenue Requirement
BEST	Brihanmumbai Electric Supply & Transport Undertaking
BPL	Below Poverty Line
CPI	Consumer Price Index
CR	Crore
D.A.	Dearness Allowance
DPR	Detailed Project Report
DSM	Demand Side Management
EV	Electric Vehicle
FY	Financial Year
GFA	Gross Fixed Assets
G-TAM	Green-Term Ahead Market
GDAM	Green Day Ahead Market
GST	Goods and Services Tax
HT	High Tension
HV	High Voltage
IDC	Interest During Construction
IEX	Indian Energy Exchange
IDT	Inverter Duty Transformer
IoWC	Interest on Working Capital
IPDS	Integrated Power Development Scheme
RES	Renewable Energy System
kVAh	kilo-Volt Ampere hour
kW	kilo Watt
kWh	kilo Watt hour
LT	Low Tension
LV	Low Voltage
MERC	Maharashtra Electricity Regulatory Commission
MSEDCL	Maharashtra State Electricity Distribution Company Ltd.
MSLDC	Maharashtra State Load Dispatch Centre
MTR	Mid-Term Review
MU	Million Units
MUS	Million Units
MW	MegaWatt
MYT	Multi-Year Tariff
O&M	Operation and Maintenance
PPA	Power Purchase Agreement
PXIL	Power Exchange India Limited
RDSS	Revamped Distribution Sector Scheme
RE	Renewable Energy
RTC	Real-time Clock
REC	Renewable Energy Certificate
RPO	Renewable Purchase Obligation
RPS	Renewable Power Source
RS	Rupees
SECI	Solar Energy Corporation of India



Abbreviation	Full Form
ToD	Time of Day
TPC-G	The Tata Power Company-Generation Business
WPI	Wholesale Price Index



1 Background

1.1 Background

- 1.1.1 Maharashtra Electricity Regulatory Commission has notified the MERC (Multi Year Tariff) Regulations, 2019 (herein after referred as MYT Regulations, 2019). These Regulations are applicable for the Fourth MYT control period from FY 2020-21 to FY 2024-25.
- 1.1.2 On 29th November 2019 BEST had filed its MYT Petition for Truing up of Aggregate Revenue Requirement (ARR) for FY 2017-18 and FY 2018-19, Provisional Truing up of ARR for FY 2019-20 and ARR for the 4th Control Period FY 2020-21 to FY 2024-25 and the Hon'ble Commission has issued Order dated 30th March 2020 in Case No. 324 of 2019 regarding the same.
- 1.1.3 In line with regulation 5 of MERC (MYT) Regulations, 2019, BEST is hereby submitting its MTR Petition for Truing up of the Aggregate Revenue Requirement (ARR) and Revenue for FY 2019-20, FY 2020-21 and FY 2021-22, Provisional Truing up for FY 2022-23 and Revised ARR and Tariff for Control Period FY 2023-24 & FY 2024-25 along with audited accounts for FY 2019-20, FY 2020-21 & FY 2021-22 and the details in the stipulated formats.

2 Truing up for FY 2019-20, FY 2020-21 and FY 2021-22

2.1 Truing up details

- 2.1.1 BEST proposes Truing up of its expenses and revenue based on the audited accounts for FY 2019-20 as per provisions of MERC (MYT) Regulations, 2015 and for FY 2020-21 and FY 2021-22 based on the provisions of MERC MYT Regulations, 2019 and other aspects as submitted in the Petition.

2.2 Energy Sales and Energy Balance

- 2.2.1 The summary of the category-wise sales as approved by the Hon'ble Commission in the MYT Order and actual for FY 2019-20, FY 2020-21 and FY 2021-22 shown in Table below:



Table 1: Tariff Category wise energy consumption for FY 2019-20 (MU)

Consumer Category	FY 19-20		
	Approved with MYT Order	Actual	True-up Requirement
HT Category			
HT-1 Industrial	156.77	178.86	22.09
HT-2 Commercial	246.67	225.83	(20.85)
HT-3 Residential	30.65	30.03	(0.62)
HT-4 PWW	35.73	37.34	1.61
HT-5B MMRDA	2.14	2.22	0.08
HT 6A Sch & Hosp	26.59	25.84	(0.75)
HT 6B Public Service	160.99	159.87	(1.12)
HT 7 Temp	26.27	20.81	(5.46)
Total HT Category	685.82	680.80	(5.02)
LT Category			
LT-I (A) Residential (BPL)	0.07	0.03	(0.04)
LT - I(B) Residential	-		-
0 – 100 units	749.52	750.10	0.58
101 – 300 units	693.02	699.57	6.55
301 - 500 units	221.82	217.26	(4.56)
> 501 units	382.33	367.76	(14.57)
LT - II (a) Commercial	895.92	885.74	(10.18)
LT - II (b) Commercial >20 & <=50 kW	211.19	209.25	(1.94)
LT - II (c) Commercial >50	370.11	369.41	(0.70)
LT - III (A) Industry (up to 20 kW)	43.25	46.88	3.63
LT-III (b) Industrial above 20 kW	90.33	84.49	(5.84)
LT-IV PWW	6.82	5.45	(1.37)
LT - V Advertisement & Hoardings	1.52	1.43	(0.09)
LT - VI Street Lights	19.05	18.96	(0.09)
LT - VII (a) Temporary Supply Religious	0.20	0.17	(0.03)
LT - VII (b) Temporary Supply Others	14.90	10.75	(4.15)
LT - VIII Crematorium and Burial Grounds	1.54	1.47	(0.07)
LT - IX (A) Public Services -Govt. Hosp. & Edu. Institutions	55.22	56.79	1.57
LT - IX (B) Public Services -others	163.17	162.42	(0.74)
LT-X (A) Agriculture- Pump sets	-	-	-
LT-X (B) Agriculture- Others	-	-	-
LT XI Vehicle Charging	0.24	0.62	0.38
Total LT Category	3,920.22	3,888.54	(31.67)
Total Sales	4,606.03	4,569.34	(36.69)



Table 2: Tariff Category-wise energy consumption for FY 2020-21 (MU)

Consumer Category	FY 2020-21		
	Approved with MYT Order	Actual	True-up Requirement
HT Category			
HT-1 Industrial	156.73	144.92	(11.81)
HT-2 Commercial	278.98	162.09	(116.88)
HT-3 Group Hsg	30.65	29.01	(1.64)
HT-4 Railway Metro	2.14	1.82	(0.32)
HT 5A Govt Sch & Hosp.	26.59	21.80	(4.79)
HT 5B Public Ser. Oths	196.66	184.75	(11.91)
HT 6 EV chg.	-	-	-
Total HT Category	691.73	544.39	(147.34)
LT Category			
LT-1 A (BPL)	0.07	0.02	(0.05)
LT-1 B Residential	-	-	-
0 – 100 units	759.42	725.88	(33.54)
101 – 300 units	702.37	639.38	(62.99)
301 - 500 units	226.30	189.19	(37.11)
> 501 units	387.39	348.98	(38.41)
LT - II (a) Commercial	919.85	533.85	(386.00)
LT - II (b) Commercial >20 & <=50 kW	211.13	151.07	(60.06)
LT - II (c) Commercial >50	370.00	283.89	(86.11)
LT - III (A) Industry (upto 20 kW)	43.23	72.89	29.66
LT-III (b) Industrial above 20 kW	90.31	71.78	(18.53)
LT-IV(A) Public Services - Govt. Hosp. & Edu. Insti.	55.68	59.25	3.57
LT-IV(B) Public Services - Others	185.87	162.46	(23.41)
LT-VA Agriculture - Pumpsets	-	-	-
LT-VB Agriculture - Others	-	-	-
LT-VI Vehicle Chg	0.30	2.42	2.12
Total LT Category	3,951.92	3,241.05	(710.87)
Total Sales (HT in kVAh & LT in kWh)	4,643.65	3,785.44	(858.21)

In the above table, the figure for HT sales is provided in kVAh. However, for the calculation of the Energy Balance the HT sales have been considered in kWh and hence the total sales in MUs for FY 2020-21 are 3776.84 MUs.



Table 3: Tariff Category-wise energy consumption for FY 2021-22 (MU)

Consumer Category	FY 21-22		
	Approved with MYT Order	Actual	True-up Requirement
HT Category			
HT-1 Industrial	156.66	147.67	(8.99)
HT-2 Commercial	286.41	193.68	(92.73)
HT-3 Group Hsg	30.63	26.53	(4.10)
HT-4 Railway Metro	2.14	2.52	0.38
HT 5A Govt Sch & Hosp.	26.57	26.26	(0.31)
HT 5B Public Ser. Oths	196.57	184.87	(11.70)
HT 6 EV chg.	-	-	-
Total HT Category	698.99	581.54	(117.45)
LT Category			
LT-I (A) Residential (BPL)	0.07	0.01	(0.06)
<u>LT - I(B) Residential</u>			-
0 – 100 units	769.35	729.87	(39.48)
101 – 300 units	711.56	680.51	(31.05)
301 - 500 units	229.24	216.88	(12.36)
> 501 units	392.45	360.46	(31.99)
<u>LT - II (a) Commercial</u>	927.29	676.08	(251.21)
LT - II (b) Commercial >20 & <=50 kW	211.04	144.39	(66.65)
LT - II (c) Commercial >50	369.84	290.96	(78.88)
LT - III (A) Industry (upto 20 kW)	43.21	93.72	50.51
LT-III (b) Industrial	90.27	77.18	(13.09)
LT - IV (A) Public Services - (Govt. Hosp. & Edu. Institutions)	56.14	54.39	(1.75)
LT - IV (B) Public Services - Others	183.95	161.15	(22.80)
LT-V (A) Agriculture- Pumpsets	-	-	-
LT-V (B) Agriculture- Others	-	0.02	0.02
LT VI Vehicle Charging	0.37	11.25	10.88
Total LT Category	3,984.79	3,496.89	(487.90)
Total Sales (HT in kVAh & LT in kWh)	4,683.78	4,078.43	(605.35)

In the above table, the figure for HT sales is provided in kVAh. However, for the calculation of the Energy Balance the HT sales have been considered in kWh and hence the total sales in MUs for FY 2021-22 are 4068.97 MUs.

2.2.2 The Energy Balance for FY 2019-20, FY 2020-21 and FY 2021-22 is as summarized in table below:



Table 4: Energy balance for FY 2019-20

Sr. No.	Particulars	FY 2019-20	
		Approved in MYT Order	Actual
1	Sales (MU)	4,606.03	4,569.34
2	Distribution loss (%)	5.60%	4.65%
3	Energy Requirement at T-D interface (MU)	4,879.27	4,792.25
4	Intra-state Transmission loss (%)	3.18%	3.16%
5	Energy Requirement at G-T interface (MU)	5,039.45	4,948.73

Table 5: Energy balance for FY 2020-21

Sr No	Particulars	FY 2020-21	
		Approved with MYT Order	Actual
1	Sales (MU)	4,643.66	3,776.84
2	Distribution loss (%)	4.18%	3.93%
3	Energy Requirement at T-D interface (MU)	4,846.23	3,931.42
4	Intra-state Transmission loss (%)	3.18%	2.93%
5	Energy Requirement at G-T interface (MU)	5,005.33	4,050.12

Table 6: Energy balance for FY 2021-22

Sr No	Particulars	FY 2021-22	
		Approved with MYT Order	Actual
1	Sales (MU)	4,683.78	4,068.97
2	Distribution loss (%)	4.18%	4.63%
3	Energy Requirement at T-D interface (MU)	4,888.10	4,266.59
4	Intra-state Transmission loss (%)	3.18%	3.19%
5	Energy Requirement at G-T interface (MU)	5,048.58	4,407.20

2.2.1 BEST has considered actual Intra-State Transmission loss to determine energy requirement at G<>T interface. BEST has achieved distribution loss of 4.65% vis-à-vis approved distribution loss of 5.60% for FY 2019-20, distribution loss of 3.93% vis-à-vis approved distribution loss of 4.18% for FY 2020-21, distribution loss of 4.63% vis-à-vis approved distribution loss of 4.18% for FY 2021-22 in MYT Order.

2.3 Power Purchase expense for FY 2019-20, FY 2020-21 and FY 2021-22

2.3.1 Summary of Power Purchase expenses for FY 2019-20, FY 2020-21 & FY 2021-22 are shown in Tables below:



Table 7: Summary of Power Purchase Expenses for FY 2019-20

Sr. No.	Particulars	Approved with MYT Order			Actual		
		Quantum (MU)	Total Cost (Rs. crore)	Rate (Rs./kWh)	Quantum (MU)	Total Cost (Rs. crore)	Rate (Rs./kWh)
1	TPC-G	3,521.45	1,529.59	4.34	3,446.56	1,489.18	4.32
2	Walwhan Solar Energy Maharashtra (Erstwhile Welspun)	31.50	26.96	8.56	32.25	26.96	8.36
3	Manikaran Power Limited	-	-	-	64.21	25.46	3.97
4	Bilateral Power Purchase	1,418.50	567.40	4.00	647.15	249.98	3.86
5	Short Term Non-Solar Purchase	68.00	47.40	6.97	58.95	41.12	6.97
6	Standby Support from MSEDCL	-	-	-	5.55	-	-
7	MSLDC Pool Imbalance	-	-	-	694.06	-	-
8	REC Procurement-Solar	144.41	39.16	2.71	136.69	34.52	2.53
9	REC Procurement-Non-Solar	504.65	142.82	2.83	513.00	99.54	1.94
10	Prior Period (RPS)_Additional Power of March-2019	-	-	-	-	0.77	-
11	RES Rebate	-	-	-	-	(1.01)	-
12	PXIL_REC GST of Prior period	-	-	-	-	0.09	-
13	Other Charges	-	182.72	-	-	222.41	-
14	Intra-State Transmission Charges	-	224.52	-	-	224.88	-
15	MSLDC Charges	-	1.13	-	-	1.13	-
	Total	5,039.45	2,761.69	5.48	4,948.73	2,415.04	4.88

Table 8: Summary of Power Purchase Expenses for FY 2020-21

Sr. No.	Particulars	Approved with MYT Order			Actual		
		Quantum (MU)	Total Cost (Rs. crore)	Rate (Rs. / kWh)	Quantum (MU)	Total Cost (Rs. crore)	Rate (Rs. / kWh)
1	TPC-G	3,588.43	1,702.00	4.51	3,085.23	1,274.57	4.13
2	Walwhan Solar Energy Maharashtra (Erstwhile Welspun)	31.50	26.96	8.56	31.91	26.77	8.39
3	Manikaran Power Limited	744.60	325.64	4.37	846.41	330.92	3.91
4	Bilateral Power Purchase	640.80	256.32	4.00	114.55	43.35	3.78
5	Standby Support from MSEDCL	-	-	-	2.86	-	-
6	MSLDC Pool Imbalance	-	-	-	-30.85	-	-
7	REC Procurement-Solar	156.33	15.63	1.00	-	-	-
8	REC Procurement-Non-Solar	490.04	49.00	1.00	-	-	-
9	Other Charges	-	374.76	-	-	355.50	-
10	Intra-State Transmission Charges	-	258.80	-	-	258.48	-
11	MSLDC Charges	-	1.29	-	-	1.29	-
	Total	5,005.33	3,010.40	6.01	4,050.12	2,290.87	5.66



Table 9: Summary of Power Purchase Expenses for FY 2021-22

Sr. No.	Particulars	Approved with MYT Order			Actual		
		Quantum (MU)	Total Cost (Rs. crore)	Rate (Rs. / kWh)	Quantum (MU)	Total Cost (Rs. crore)	Rate (Rs. / kWh)
1	TPC-G	3,656.63	1,681.09	4.60	3,284.74	1,760.21	5.36
2	Walwhan Solar Energy Maharashtra (Erstwhile Welspun)	31.50	26.96	8.56	31.62	26.96	8.53
3	Manikaran Power Limited	744.60	328.83	4.42	720.08	294.01	4.08
4	Bilateral Power Purchase	615.84	246.34	4.00	-	-	-
5	Trader	-	-	-	42.31	28.85	6.82
6	Standby Support from MSEDCL	-	99.40	-	-	99.40	-
7	MSLDC Pool Imbalance	-	-	-	34.99	17.86	5.10
8	REC Procurement-Solar	220.87	22.09	1.00	-	37.42	-
9	REC Procurement-Non-Solar	495.02	49.50	1.00	-	63.69	-
10	IEX net	-	-	-	266.76	116.50	4.37
11	RPS-Non-Solar_IEX_GTAM_GDAM	-	-	-	0.57	0.24	4.22
12	RPS-Solar_IEX_GTAM_GDAM	-	-	-	19.79	8.22	4.15
13	Other Charges	-	-	-	6.33	77.60	-
14	Intra-State Transmission Charges	-	257.96	-	-	258.00	-
15	MSLDC Charges	-	1.20	-	-	1.20	-
	Total	5,048.58	2,713.36	5.37	4,407.20	2,790.17	6.33

2.4 True-up of Aggregate Revenue Requirement of FY 2019-20, FY 2020-21 and FY 2021-22

2.4.1 BEST submits the Truing up for FY 2019-20, FY 2020-21 and FY 2021-22 is based on comparison of the actual/normative expense incurred and the revenue earned during the year vis-à-vis the figures approved by the Hon'ble Commission in MYT Order. BEST submits that actual Interest on Loan & actual Interest on Working Capital is claimed in the True-up instead of, according to normative principles. BEST submits that major gap in FY 2021-22 is due to change in sales mix resulting into lower revenue realization as compared to approved figures. Further, each component of the ARR is available in detail in the Main Petition.

2.4.2 The Truing up summary for FY 2019-20, FY 2020-21 and FY 2021-22 is as under:



Table 10: True-up of Aggregate Revenue Requirement for FY 2019-20 (Rs. crore)

Particulars	MYT Order	Actual	Deviation
Power Purchase Expenses (including Inter-State Transmission Charges)	2,536.04	2,189.03	(347.01)
Operation & Maintenance Expenses	579.64	539.18	(40.46)
Depreciation	108.72	100.03	(8.69)
Interest on Loan Capital	-	41.24	41.24
Interest on Working Capital	0.90	8.88	7.98
Interest on Consumer Security Deposit	38.44	37.69	(0.75)
Write-off of Provision for bad and doubtful debts	6.74	5.09	(1.65)
Contribution to contingency reserves	6.50	-	(6.50)
Intra-State Transmission Charges	224.52	224.88	0.36
MSLDC Fees & Charges	1.13	1.13	(0.00)
Income Tax	-	-	-
Other Expenses	50.75	46.68	(4.07)
Total Revenue Expenditure	3,553.37	3,193.82	(359.55)
Add: Return on Equity Capital	140.93	141.71	0.78
Add: return on Internal fund	5.28	5.28	(0.00)
Add: Sharing of Gain/(Loss) of Distribution loss	-	7.33	7.33
Add: Sharing of Gain & Loss on IoWC	-	-	-
Add: O&M sharing gain and loss	-	25.79	25.79
Aggregate Revenue Requirement	3,699.59	3,373.93	(325.67)
Less: Non-Tariff Income	53.63	39.27	(14.36)
Less: Income from other business	-	-	-
Less: Receipts on account of Cross-Subsidy Surcharge	-	-	-
Less: Receipts on account of Additional Surcharge, if any	-	-	-
Recovery of gap/(surplus) of previous years till third control period-Wire Business	-	-	-
Aggregate Revenue Requirement from Retail Supply + Distribution Wires	3,645.96	3,334.66	(311.31)

Table 11: Standalone Revenue Gap/(Surplus) for FY 2019-20

Particulars	MYT Order	Amount (Rs. Crore)
Total ARR	3,645.96	3,334.66
Revenue from Sale of Power	3,447.52	3,466.68
Revenue gap/(surplus) for FY 2019-20	198.44	(132.02)



Table 12: True-up of Aggregate Revenue Requirement for FY 2020-21 (Rs. crore)

Particulars	MYT Order	Actual	Deviation
Power Purchase Expenses (including Inter-State Transmission Charges)	2,750.30	2,031.10	(719.20)
Operation & Maintenance Expenses	565.54	590.81	25.27
Depreciation	112.36	104.08	(8.28)
Interest on Loan Capital	-	36.60	36.60
Interest on Working Capital	5.22	10.57	5.35
Interest on Consumer Security Deposit	22.50	17.13	(5.37)
Write-off of Provision for bad and doubtful debts	6.74	3.91	(2.83)
Contribution to contingency reserves	6.85	7.12	0.27
Intra-State Transmission Charges	258.80	258.48	(0.32)
MSLDC Fees & Charges	1.29	1.29	0.00
Income Tax	-	-	-
Other Expenses	44.70	44.55	(0.15)
Total Revenue Expenditure	3,774.31	3,105.64	(668.67)
Add: Return on Equity Capital	129.45	140.83	11.38
Add: return on Internal fund	5.28	5.28	(0.00)
Add: Sharing of Gain/(Loss) of Distribution loss	-	1.75	1.75
Add: Sharing of Gain & Loss on IoWC	-	-	-
Add: O&M sharing gain and loss	-	26.95	26.95
Aggregate Revenue Requirement	3,909.02	3,280.45	(628.57)
Less: Non-Tariff Income	55.24	17.44	(37.80)
Less: Income from other business	-	-	-
Less: Receipts on account of Cross-Subsidy Surcharge	-	-	-
Less: Receipts on account of Additional Surcharge, if any	-	-	-
Recovery of gap/(surplus) of previous years till third control period-Wire Business	(771.50)	(771.50)	-
Aggregate Revenue Requirement from Retail Supply+Distribution Wires	3,082.28	2,491.51	(590.77)

Table 13: Standalone Revenue Gap/(Surplus) for FY 2020-21

Sr. No.	Particulars	MYT Order	Amount (in Rs. Cr.)
1	Net ARR	3,853.78	3,263.01
2	Past Revenue gap/(surplus)	(771.50)	(771.50)
3	Net ARR with past revenue Gap/(Surplus)	3,082.28	2,491.51
4	Revenue from Sale of Power	3,393.64	2,792.74
5	Revenue gap/(surplus)	(311.36)	(301.24)



Table 14: True-up of Aggregate Revenue Requirement for FY 2021-22 (Rs. crore)

Particulars	MYT Order	Actual	Deviation
Power Purchase Expenses (including Inter-State Transmission Charges)	2,454.20	2,530.96	76.76
Operation & Maintenance Expenses	581.57	638.20	56.63
Depreciation	113.78	105.52	(8.26)
Interest on Loan Capital	-	31.76	31.76
Interest on Working Capital	5.25	9.93	4.68
Interest on Consumer Security Deposit	23.18	15.65	(7.53)
Write-off of Provision for bad and doubtful debts	6.74	4.59	(2.15)
Contribution to contingency reserves	6.94	7.40	0.46
Intra-State Transmission Charges	257.96	258.00	0.04
MSLDC Fees & Charges	1.20	1.20	(0.00)
Income Tax	-	-	-
Other Expenses	46.04	53.81	7.77
Total Revenue Expenditure	3,496.86	3,657.02	160.16
Add: Return on Equity Capital	130.37	146.90	16.54
Add: return on Internal fund	5.28	5.28	(0.00)
Add: Sharing of Gain/(Loss) of Distribution loss	-	(3.98)	(3.98)
Add: Sharing of Gain & Loss on IoWC	-	-	-
Add: O&M sharing gain and loss	-	(14.76)	(14.76)
Aggregate Revenue Requirement	3,632.51	3,790.46	157.95
Less: Non-Tariff Income	56.90	26.84	(30.06)
Less: Income from other business	-	-	-
Less: Receipts on account of Cross-Subsidy Surcharge	-	-	-
Less: Receipts on account of Additional Surcharge, if any			-
Recovery of gap/(surplus) of previous years till third control period-Wire Business	(340.93)	(340.93)	-
Aggregate Revenue Requirement from Retail Supply+Distribution	3,234.68	3,422.69	188.01

Table 15: Standalone Revenue Gap/(Surplus) for FY 2021-22

Sr. No.	Particulars	MYT Order	FY 2021-22
1	Net ARR	3,575.61	3,763.62
2	Past Revenue gap/(surplus)	(340.93)	(340.93)
3	Net ARR including past revenue Gap/(Surplus)	3,234.68	3,422.69
4	Revenue from Sale of Power	3,423.41	2,995.19
5	Revenue gap/(surplus)	(188.73)	427.50

2.4.3 Separate revenue gap / (surplus) for Wires and Retail Supply are computed for each year and available in the main petition.

3 RPO Compliance

3.1.1 **RPO Compliance for FY 2020-21 & FY 2021-22:** As per the directives of Hon'ble Commission in its Order (Case No. 50 of 2021) dated 07.09.2021, BEST has submitted RPO details in the



MTR petition and requested to verify the Compliance of RPO targets for FY 2020-21 and FY 2021-22 under RPO Regulations 2019. BEST request the Hon'ble Commission to carry forward the shortfall in RPO compliance, if any to the next control period considering surplus tied up capacity (SECI 400 MW Hybrid Power & SECI – 234 MW Solar Power) and other efforts / power to procure either on short term tender route / GDAM/GTAM as available and cost competitively available. BEST has detailed out the effort being undertaken to meet the RPO in the Main Petition.

4 Provisional Truing up for FY 2022-23

4.1.1 Regulation 5.1 (a) (iii) of MYT Regulations 2019 specifies for provisional truing up to be filed for FY 2022-23 in line with the MYT Regulations, 2019. In line with these Regulations, BEST has carried out provisional truing up of FY 2022-23.

4.2 Energy Sales and Energy Balance

4.2.1 The summary of the category-wise sales considered for provisional True-Up (actual + estimated) are shown in the Table below:



Table 16: Category wise energy consumption for FY 2022-23 (HT in kVAh & LT in kWh)

Consumer Category	FY 2022-23				
	Approved in MYT Order	Apr-Sep (Actual)	Oct-Mar (Estimated)	Apr-Mar (Estimated)	Provisional True-Up requirement
HT Category					
HT-1 Industrial	156.56	86.38	104.00	190.39	33.83
HT-2 Commercial	295.54	117.47	90.98	208.45	(87.09)
HT-3 Group Hsg	30.61	17.18	14.94	32.12	1.51
HT-4 Railway Metro	2.14	1.32	1.25	2.57	0.43
HT 5A Govt Sch & Hosp.	26.56	15.17	12.62	27.78	1.22
HT 5B Public Ser. Oths	196.45	101.35	84.66	186.01	(10.44)
HT 6 EV chg.	-	-	-	-	-
Sub-total	707.85	338.88	308.45	647.33	(60.54)
LT Category					
LT-I (A) Residential (BPL)	0.07	0.01	0.03	0.04	(0.04)
<u>LT - I(B) Residential</u>	-	-	-	-	-
0 – 100 units	779.27	378.95	370.76	749.71	(29.56)
101 – 300 units	720.72	386.84	334.26	721.10	0.38
301 - 500 units	232.17	134.12	103.50	237.62	5.45
> 501 units	397.51	220.37	174.96	395.33	(2.18)
<u>LT - II (a) Commercial</u>	934.60	430.42	396.07	826.49	(108.11)
LT - II (b) Commercial >20 & ≤50 kW	210.90	90.98	79.78	170.76	(40.14)
LT - II (c) Commercial >50	369.60	191.79	166.44	358.23	(11.37)
LT - III (A) Industry (upto 20 kW)	43.19	51.22	54.52	105.74	62.55
LT-III (b) Industrial	90.21	41.07	38.74	79.81	(10.40)
LT - IV (A) Public Services - (Govt. Hosp. & Edu. Institutions)	56.59	32.68	28.71	61.40	4.80
LT - IV (B) Public Services - Others	183.84	96.19	82.63	178.82	(5.02)
LT-V (A) Agriculture- Pumpsets	-	-	-	-	-
LT-V (B) Agriculture- Others	-	0.03	0.02	0.05	0.05
LT VI Vehicle Charging	0.46	9.08	9.09	18.17	17.71
Debit/credit adjustment	-	-	-	-	-
Sub-total	4,019.14	2,063.75	1,839.52	3,903.27	(115.87)
Total	4,726.99	2,402.63	2,147.97	4,550.60	(176.40)

In the above table, the figure for HT sales is provided in kVAh. However, for the calculation of the Energy Balance the HT sales have been considered in kWh and hence the total sales in MUs for FY 2022-23 are 4537.98 MUs.

4.3 Energy Balance for FY 2022-23

4.3.1 The following table shows the energy balance for FY 2022-23.



Table 17: Energy Balance for FY 2022-23

Sr. No.	Particulars	FY 2022-23	
		MYT Order	April - March (Estimated)
1	Sales (MU)	4,726.99	4,537.98
2	Distribution loss (%)	4.18%	4.53%
3	Energy Requirement at T-D interface (MU)	4,933.20	4,753.30
4	Intra-state Transmission loss (%)	3.18%	3.18%
5	Energy Requirement at G-T interface (MU)	5,095.15	4,909.42

4.4 Power Purchase expense for FY 2022-23

4.4.1 Power purchase cost is considered based on 6 months actual + 6 months estimated. Following table shows the power purchase cost estimated for FY 2022-23.

Table 18: Estimated Power Purchase for FY 2022-23

Particulars	Approved			Estimated		
	Quantum (MU)	Total Cost (Rs. crore)	Rate (Rs. / kWh)	Quantum (MU)	Total Cost (Rs. crore)	Rate (Rs. / kWh)
Long term / Medium term Sources						
TPC-G	3,510.94	1,660.96	4.73	3,247.94	2,753.17	8.48
Welspun Solar Energy	31.50	26.96	8.56	31.50	26.96	8.56
Medium-Term						
Manikaran Power	744.60	332.03	4.46	744.60	314.05	4.22
Short term Sources						
Bilateral Power Purchase				220.36	124.74	
Trader				77.39	42.52	5.49
IEX (Purchase)				452.93	260.57	5.75
IEX (Sale)				(5.26)	(5.86)	11.14
Solar Energy						
Non Solar Energy				20.56	8.90	4.33
RPS-Non-Solar IEX GTAM GDAM	500.37	143.61				
RPS-Solar IEX GTAM GDAM	307.74	89.25		113.84	49.32	4.33
Standby Support from MSEDCL				7.10	-	-
Deviation Settlement (DSM) Energy				(20.13)	5.12	(2.54)
MSLDC Pool Imbalance				19.73	-	-
Inter Discom Sale (IDT)				(1.14)	(1.37)	11.98
Stand By Charges		98.53		-	98.53	
Transmission Charges		256.72			256.72	
MSLDC Charges		1.27			1.27	
Bilateral Rebate						
RPS Rebate				-	(0.21)	
Rebate of 1% on Trans.Charges				-	(1.28)	
Rebate of 1% on monthly MSLDC Charges				-	(0.01)	
Prior Period (RPS) Additional Power of March-2022 from M/s.Walwhan				-	0.01	
Prior Period Payment of DSM Bills				-	0.01	
TPC-G Credit Bill (Oct-2021 to Mar-2022)				-	(0.35)	
Total	5,095.15	2,609.33	5.12	4,909.42	3,932.83	8.01

4.5 Provisional True-up of Aggregate Revenue Requirement of FY 2022-23

4.5.1 BEST submits the Provisional Truing up for FY 2022-23 based on comparison of the actual and/normative expense and the revenue expected to be earned during the year vis-à-vis the



figures approved by the Hon'ble Commission in MYT Order. Each component of the ARR is available in detail in the Main Petition.

4.5.2 The primary reason for revenue gap is increase in power purchase cost due to coal shortage, imported coal use by thermal generators and heavy dependence on open market sources. The situation is still expected to prevail for a few more months. BEST submits that each component of the ARR is worked out in detail in the Main Petition and the summary of Provisional Truing up of ARR for FY 2022-23 is as under.

Table 19: Provisional True-up of Aggregate Revenue Requirement of FY 2022-23 (Rs Crore)

Sr. No	Particulars	FY 2022-23				Provisional True-Up requirement
		MYT Order	Apr-Sep (Actual)	Oct-Mar (Estimated)	April - March (Estimated)	
1	Power Purchase Expenses (including Inter-State Transmission Charges)	2,351.34	1,922.20	1,752.63	3,674.83	1,323.49
2	Operation & Maintenance Expenses	598.05	323.12	323.12	646.24	48.19
3	Depreciation	115.07	54.77	54.77	109.53	(5.54)
4	Interest on Loan Capital	-	-	-	-	-
5	Interest on Working Capital	5.26	3.62	3.62	7.24	1.97
6	Interest on Consumer Security Deposit	23.87	9.40	9.40	18.79	(5.08)
7	Write-off of Provision for bad and doubtful debts	6.74	5.27	5.27	10.53	3.79
8	Contribution to contingency reserves	7.02	3.80	3.80	7.59	0.57
9	Intra-State Transmission Charges	256.72	128.36	128.36	256.72	(0.00)
10	MSLDC Fees & Charges	1.27	0.64	0.64	1.27	0.00
11	Income Tax	-	-	-	-	-
12	Other Expenses	47.42	13.26	13.26	26.53	(20.89)
13	Total Revenue Expenditure	3,412.77	2,464.42	2,294.85	4,759.27	1,346.50
14	Add: Return on Equity Capital	131.16	69.72	69.72	139.44	8.28
15	Add: return on Internal fund	5.28	2.64	2.64	5.28	(0.00)
16	Aggregate Revenue Requirement	3,549.21	2,536.78	2,367.21	4,903.99	1,354.78
17	Less: Non-Tariff Income	58.61	19.80	19.80	39.60	(19.01)
18	Recovery of gap/(surplus) of previous years till third control period-Wire Business	(206.65)	-	-	(206.65)	-
19	Aggregate Revenue Requirement from Retail Supply+Distribution	3,283.95	2,516.98	2,347.41	4,657.74	1,373.79

4.6 Revenue gap/(surplus) of FY 2022-23

4.6.1 BEST proposes that revenue gap/(surplus) of FY 2022-23 to be recovered in the balance control period and is as shown in the table below:

Table 20: Summary of Cumulative Revenue gap/(surplus) of FY 2022-23

Sr. No.	Particulars	MYT Order	FY 2022-23
1	Net ARR	3,490.60	4,864.39
2	Past Revenue gap/(surplus)	(206.65)	(206.65)
3	Net ARR including past gap/surplus	3,283.95	4,657.74
4	Revenue from Sale of Power	3,441.67	3,667.98
5	Revenue gap/(surplus)	(157.72)	989.75

4.6.2 However, this being provisional truing up, no carrying/holding cost is considered. Any variation in carrying cost will be considered at the time of final truing up. BEST requests the Hon'ble Commission to approve the revenue gap/(surplus) as shown in table above for



provisional truing up of FY 2022-23. Separate revenue gap / (surplus) for Wires and Retail Supply are computed for each year and available in the main petition.

5 MTR Petition for FY 2023-24 & FY 2024-25

5.1.1 As per provisions of MERC (MYT) Regulations, 2019, BEST is filing MTR Petition for approval of ARR and determination of Tariff for FY 2023-24 to FY 2024-25.

5.2 Energy Sales

5.2.1 BEST has analyzed the past trend in energy sales and the results due to covid-19 pandemic were absurd and difficult to consider for projections. Hence, BEST has considered category wise growth rate considered in the MYT order by the Hon'ble Commission. Accordingly, energy sales are forecasted and the summary of the same is given below:



Table 21: Projected Category wise energy sales in (HT in kVAh & LT in kWh)

Consumer Category	FY 2023-24 (Approved)	FY 2023-24 (Revised)	FY 2024-25 (Approved)	FY 2024-25 (Revised)
HT Category				
HT-1 Industrial	156.41	190.39	156.18	190.39
HT-2 Commercial	306.74	208.45	320.49	208.45
HT-3 Group Hsg	30.58	32.12	30.54	32.12
HT-4 Railway Metro	2.14	2.57	2.14	2.57
HT 5A Govt Sch & Hosp.	26.53	27.78	26.49	27.78
HT 5B Public Ser. Oths	196.26	186.01	195.97	186.01
HT 6 EV chg.	-	-	-	-
Sub-total	718.66	647.33	731.81	647.33
LT Category				
LT-I (A) Residential (BPL)	0.07	0.04	0.07	0.04
<u>LT - I(B) Residential</u>	-	-	-	-
0 – 100 units	789.08	759.84	798.67	770.09
101 – 300 units	729.79	730.83	738.66	740.70
301 - 500 units	235.07	240.83	237.91	244.08
> 501 units	402.51	400.66	407.41	406.07
<u>LT - II (a) Commercial</u>	941.70	833.68	948.41	840.93
LT - II (b) Commercial >20 & ≤50 kW	210.69	172.24	210.39	173.74
LT - II (c) Commercial >50	369.24	358.23	368.70	358.23
LT - III (A) Industry (upto 20 kW)	43.14	105.74	43.08	105.74
LT-III (b) Industrial	90.12	79.81	89.99	79.81
LT - IV (A) Public Services - (Govt. Hosp. & Edu. Institutions)	57.03	61.40	57.45	61.40
LT - IV (B) Public Services - Others	183.68	178.82	183.43	178.82
LT-V (A) Agriculture- Pumpsets	-	-	-	-
LT-V (B) Agriculture- Others	-	0.05	-	0.05
LT VI Vehicle Charging	0.58	22.72	0.72	28.40
Debit/credit adjustment	-	-	-	-
Sub-total	4,052.71	3,944.89	4,084.90	3,988.10
Total	4,771.37	4,592.22	4,816.71	4,635.43

In the above table, the figure for HT sales is provided in kVAh. However, for the calculation of the Energy Balance the HT sales have been considered in kWh and hence the total sales in Mus for FY 2023-24 and FY 2024-25 are 4592.22 and 4635.43 MUs respectively.

5.3 Energy Balance

5.3.1 The following table shows the energy balance for MYT period of FY 2023-24 & FY 2024-25.



Table 22: Energy Balance for the MYT Control Period

Particulars	Unit	FY 2023-24 (Approved)	FY 2023-24 (Revised)	FY 2024-25 (Approved)	FY 2024-25 (Revised)
Energy sales to consumers	MU's	4,771.37	4,579.60	4,816.71	4,622.81
Distribution Losses	MU's	208.14	212.28	210.12	209.23
Distribution Losses	%	4.18%	4.43%	4.18%	4.33%
Energy Input at Distribution Periphery	MU's	4,979.44	4,791.88	5,026.75	4,832.04
Intra State Transmission Losses	MU's	163.55	157.39	165.10	158.71
Intra State Transmission Losses	%	3.18%	3.18%	3.18%	3.18%
Total Power Purchase at G<T Periphery	MU's	5,142.99	4,949.26	5,191.85	4,990.74

5.4 Power Purchase Expenses

5.4.1 Based on the energy balance, BEST has estimated the energy requirement for the remaining years of MYT period i.e. FY 2023-24 & FY 2024-25. BEST has proposed to meet its power purchase requirement from various sources. BEST submits that it has filed a separate petition for Long Term Power Procurement Plan in line with MYT Regulations 2019 on 20.12.2022 which has been considered to the extent relevant for MTR purpose. The source wise and year wise quantum and rate estimation / details are provided below:

5.4.1.1 Tata Power – Generation

FY 2023-24

- BEST submits that, PPA with M/s Tata Power – Generation is ending in March 2024. Hence, for FY 2023-24 BEST has considered installed capacity of M/s. Tata Power and the capacity allocated to BEST as per the PPA
- BEST has proposed to purchase power from TPC-G U-5, U-7 & U-8 as per optimal plan and cost considered is equal to cost proposed by TPC-G in its MTR petition.
- The quantum of hydro power from TPC-G is restricted to MYT approved quantum and cost considered is equal to the one proposed by TPC-G in its MTR petition.

FY 2024-25

- For FY 2024-25, BEST is proposing to renew PPA for Hydro plant only, subject to approval from the Hon'ble Commission & consent from TPC-G.
- The fixed charges and variable charges are considered for FY 2024-25 is same as projected by TPC-G in its MTR petition.

5.4.1.2 Walwhan Solar

FY 2023-24

- BEST has signed a long term PPA to procure 31.5 MUs of Solar power annually at tariff of Rs. 8.56 kWh. Hence, BEST has considered the same quantum & cost for FY 2023-24

FY 2024-25

- Similarly, for FY 2024-25, BEST plans to procure 31.5 MUs of Solar power annually at tariff of Rs. 8.56 kWh according to the PPA



5.4.1.3 Manikaran

FY 2023-24

- BEST has signed PPA with M/s. Manikaran Power Ltd, therefore BEST has considered the same quantum of energy as specified in the PPA i.e. 744.60 MUs.
- Rate for M/s Manikaran Power Ltd. have been calculated based on PPA terms.

FY 2024-25

- The PPA with M/s. Manikaran Power Ltd will end in March, 2025, BEST plans to procure the power up to the installed capacity.
- As given above, the rate for FY 2024-25 has also been calculated according to PPA terms

5.4.1.4 Sai Wardha

FY 2023-24

- The power from M/s. Sai Wardha is expected to flow from January 2024 subject to approval by Hon'ble Commission. Hence, for FY 2023-24, power procurement from M/s. Sai Wardha is considered for the last 3 months
- BEST submits that, PPA conditions of M/s. Sai Wardha will be similar to M/s. Manikaran. Hence, energy procurement for the units & rates considered for projections are same.

FY 2024-25

- For FY 2024-25, the quantum and rates considered for M/s. Sai Wardha are the same as for M/s. Manikaran

5.4.1.5 RE Power / RPO compliance

FY 2023-24

- SECI has informed that it would be able to supply power post December 2024 only. Hence, BEST will explore various options like short term/medium term PPA, GTAM/GTAM, etc. to meet RPO Obligations.
- For FY 2023-24, BEST submits that apart from PPA Tied-up capacity, BEST will procure additional quantum of RE from GTAM/GDAM/ Short Term market.
- The rates considered for GTAM/GDAM/ short term procurement of RE is same as actual rate discovered in FY 2022-23.

FY 2024-25

- SECI power is considered for 3 months in FY 2024-25 only on account of the delay in the supply of power due to transmission constraints.
- BEST submits that it has considered a medium term/short term PPA for Solar Power. BEST has considered 10% escalation on rate approved by the Hon'ble Commission for procurement of 234 MW of Solar Power from SECI to obtain a rate for the New Solar Power Source.



- BEST requests the Hon'ble Commission to allow to carryforward, any shortfall in RPO compliance of current control period, to next control period and not to levy any penalty for non-compliance of RPO in the current control period.

5.4.1.6 New RTC Source

FY 2023-24

- BEST submits that, it is in the process of short-term bidding for procurement of 100 MW RTC power from February 2023 to January 2024. Hence, the power for 10 months from the new RTC is considered for FY 2023-24.
- The rate is considered same as discovered H1 rate of FY 2022-23 of bilateral procurement.

FY 2024-25

- BEST submits that since PPA of TPC-G is expiring in March 2024 it needs to plan for alternate source / any suitable arrangement. In the interim, for MTR purpose BEST has assumed that alternate source / any suitable arrangement will be done in due course of time as per Hon'ble Commission's approval on power procurement plan petition.
- With regards to cost for such alternate source, BEST submits that power purchase cost of M/s Manikaran Power Limited / M/s. Sai Wardha is in the range of Rs.4.40-4.50 per unit and assuming 5% escalation on this cost it would work out to Rs.4.75 per unit. BEST would abide by the directions of the Hon'ble Commission in power procurement plan petition and humbly submits that the projected alternate source (New RTC) cost be allowed at Rs.4.75 per unit.

5.4.1.7 DAM / Open sources power

FY 2023-24

- BEST is planning to procure from DAM & Bilateral sources also. DAM rate is assumed as average rate of Oct 2022 to Dec 2022 in power exchange while bilateral source rate is considered same as previous year.

FY 2024-25

- For FY 2024-25, BEST is proposing power purchase from DAM in line with the Power Purchase Plan
- The rate considered for DAM is same as rate considered for FY 2023-24 while short term market rate for RE power is also same as rate considered for FY 2024-25.

5.4.1.8 Other charges (Standby charges, Transmission charges, MSLDC charges, Pool Imbalance charges etc)

- BEST has considered the intra-state transmission charges & MSLDC energy as per the approved charges by Hon'ble Commission in the MYT Order in the Case No. 327 of 2019 and MYT Order in the Case No. 291 of 2019 respectively

5.4.2 The summary of power purchase expense for the balance MYT control period is as shown in the table below.



Table 23: Summary of power purchase expense for FY 2023-24 & FY 2024-25

Source of Power (Station wise)	FY 2023-24 (Approved)			FY 2023-24 (Revised)			FY 2024-25 (Approved)			FY 2024-25 (Revised)		
	Energy (MU)	Cost (Rs Cr)	Rate (Rs./kWh)	Energy (MU)	Cost (Rs Cr)	Rate (Rs./kWh)	Energy (MU)	Cost (Rs Cr)	Rate (Rs./kWh)	Energy (MU)	Cost (Rs Cr)	Rate (Rs./kWh)
Long term / Medium term Sources												
TPC-G	3,443.90	1,669.82	4.85	2,661.00	1,743.59	6.55	3,355.21	1,676.14	5.00	743.00	235.91	3.18
Welspun Solar Energy	31.50	26.96	8.56	31.50	26.97	8.56	31.50	26.96	8.56	31.50	26.96	8.56
Medium-Term												
Manikaran Power	744.60	335.24	4.50	744.60	323.88	4.35	744.60	338.45	4.55	744.60	330.05	4.43
Sai Wardha	-	-	-	183.64	80.75	4.35	-	-	-	744.60	330.05	4.43
Short term Sources												
Solar Power	417.12	120.96	2.90	-	-	-	549.05	159.23	2.90	-	-	-
Non-Solar Power	505.87	145.19	2.87	-	-	-	511.49	146.80	2.87	-	-	-
RPS-Solar IEX	-	-	-	202.85	87.63	4.32	-	-	-	304.50	131.54	4.32
RPS-Non-Solar IEX	-	-	-	222.15	95.97	4.32	-	-	-	333.50	144.07	4.32
SECI Hybrid - Solar (Tranche III)	-	-	-	-	-	-	-	-	-	124.00	30.75	2.48
SECI Hybrid - Wind (Tranche III)	-	-	-	-	-	-	-	-	-	47.00	11.66	2.48
Solar New	-	-	-	-	-	-	-	-	-	493.00	146.96	2.98
New RTC	-	-	-	622.20	352.22	5.66	-	-	-	786.15	373.42	4.75
Stand By Charges	-	97.66	-	-	97.66	-	-	96.79	-	-	96.79	-
Transmission Charges	-	254.91	-	-	254.91	-	-	250.31	-	-	250.31	-
MSLDC Charges	-	1.35	-	-	1.35	-	-	1.36	-	-	1.36	-
DAM	-	-	-	279.31	128.14	4.59	-	-	-	638.90	293.10	4.59
Past Period Pool Imbalance	-	-	-	-	61.97	-	-	-	-	-	-	-
Total	5,142.99	2,652.09	5.16	4,949.26	3,255.03	6.58	5,191.85	2,696.04	5.19	4,990.74	2,402.93	4.81



5.5 Operation and Maintenance Expenses

5.5.1 BEST has computed the normative O&M expenses based on the composite norms under Regulation 75 and 84 of MERC MYT Regulations, 2019. For Projecting O&M of ensuing years, the escalation factor of FY 2021-22 is 5.06% p.a. which has been computed considering corresponding increase in WPI Index (70% weightage taken) declared by Office of Economic Affairs and CPI index (30% weightage taken) declared by the Ministry of Labor & Employment, Government of India and thereafter reduced by efficiency factor of 0.16% resulting in a net escalation factor of 4.90% p.a. for ARR purpose.

5.5.2 BEST has separately considered expenses towards Smart Meter Scheme under Totex Model (as mandatory under RDSS scheme) and added the same in OPEX Scheme under the O&M expenses as per regulatory provisions. BEST requests the Hon'ble Commission to consider Smart Meter Scheme under Opex Scheme and allow Smart Meter Scheme expenses over & above normative O&M expenses in accordance with Regulations 84.7 of MYT Regulations, 2019.

5.5.3 The normative O&M expenses worked out by BEST are as shown in table below.

Table 24: Summary of O&M Expenses for FY 2023-24 to FY 2024-25 (Rs.Cr)

Particulars	FY 2023-24 (Approved)	FY 2023-24 (Revised)	FY 2024-25 (Approved)	FY 2024-25 (Revised)
Normative O&M	614.99	677.89	632.42	711.10
Opex Scheme		47.51		136.48
Total O&M Expenses	614.99	725.41	632.42	847.58

5.6 Capital Expenditure/ Capitalization

5.6.1 The RDSS Scheme aims to carry out the works enabling improvement in the quality and reliability of power supply to consumers, by providing conditional financial assistance to DISCOMs to make the sector financially sustainable and operationally efficient. To achieve the above goal and to utilize the opportunity provided by the Central Government in form of Grant under the Revamped Distribution Sector Scheme (RDSS) an Action plan & DPR was prepared. The grant to be provided is in the ratio of 60:40 for the component of Distribution Infrastructure works wherein the Central Government would be providing grant to the extent of 60% of the total value of the RDSS package and 40% shall have to be provided through internal funds of the utility.

5.6.2 The estimated capital expenditure and capitalization along with funding for FY 2023-24 and FY 2024-25 is as shown in the table below:

Table 25: Capex & Capitalization for FY 2023-24 and FY 2024-25 (Rs. Crore)

Sr. No.	Particulars	FY 2023-24 (Approved)	FY 2023-24 (Revised)	FY 2024-25 (Approved)	FY 2024-25 (Revised)
1	Capital Expenditure	-	960.65	-	828.06
2	Capitalisation	71.10	960.65	71.10	828.06
3	DPR Schemes*	-	939.65	-	807.06
4	Non-DPR Schemes		21.00		21.00
5	Capitalisation + IDC	71.10	960.65	71.10	828.06



Table 26: Funding of Capitalization for FY 2023-24 and FY 2024-25 (Rs Crore)

Sr. No.	Particulars	FY 2023-24 (Approved)	FY 2023-24 (Revised)	FY 2024-25 (Approved)	FY 2024-25 (Revised)
1	Capital Connection Fee	10.69	7.71	10.69	7.71
2	Grants for IPDS Scheme/RDSS Scheme		301.84		228.47
3	Grants for Street Lights	2.25	7.50	2.35	7.50
4	Loan	40.71	450.51	40.64	409.06
5	Internal Source	17.45	193.08	17.42	175.31
6	Total of Capitalisation including IDC	71.10	960.65	71.10	828.06

5.7 Summary of Aggregate Revenue Requirement for FY 2023-24 & FY 2024-25

5.7.1 BEST has worked out each component of the ARR for the Fourth MYT control period as explained in the Main Petition and the summary of proposed Aggregate Revenue Requirement for the MYT Control Period of FY 2023-24 & FY 2024-25 is as presented in table below:

Table 27: Summary of Aggregate Revenue Requirement for FY 2023-24 & FY 2024-25 (Rs Crore)

Sr. No.	Particulars	FY 2023-24 (Approved)	FY 2023-24 (Revised)	FY 2024-25 (Approved)	FY 2024-25 (Revised)
1	Power Purchase Expenses (including Inter-State Transmission Charges)	2,395.83	2,998.77	2,444.37	2,151.26
2	Operation & Maintenance Expenses	614.99	725.41	632.42	847.58
3	Depreciation	116.36	128.35	117.64	159.27
4	Interest on Loan Capital	-	16.18	-	44.74
5	Interest on Working Capital	5.29	8.07	5.32	9.40
6	Interest on Consumer Security Deposit	24.59	19.31	25.33	19.84
7	Write-off of Provision for bad and doubtful debts	6.74	9.18	6.74	7.58
8	Contribution to contingency reserves	7.10	7.90	7.18	10.25
9	Intra-State Transmission Charges	254.91	254.91	250.31	250.31
10	MSLDC Fees & Charges	1.35	1.35	1.36	1.36
11	Income Tax	-	-	-	-
12	Other Expenses	48.85	27.56	50.31	28.59
13	Total Revenue Expenditure	3,476.00	4,196.99	3,540.98	3,530.18
14	Add: Return on Equity Capital	131.95	153.03	132.74	176.31
15	Add: return on Internal fund	5.28	5.28	5.28	5.28
16	Aggregate Revenue Requirement	3,613.23	4,355.31	3,679.00	3,711.77
17	Less: Non-Tariff Income	60.36	40.79	62.17	42.01
18	Recovery of gap/(surplus) of previous years approved in MYT Order	(172.70)	(172.70)	(103.35)	(103.35)
19	Aggregate Revenue Requirement from Retail Supply+Distribution	3,380.17	4,141.82	3,513.48	3,566.41

5.7.2 BEST has worked out the revenue gap considering existing tariff for FY 2023-24 & FY 2024-25 is as presented in table below:

Table 28: Standalone Revenue Gap/(Surplus) for FY 2023-24 & FY 2024-25

Sr. No.	Particulars	FY 2023-24		FY 2024-25	
		Approved	Estimated	Approved	Estimated
1	Gross ARR	3,552.87	4,314.52	3,616.83	3,669.76
2	Past Revenue gap/(surplus)	(172.70)	(172.70)	(103.35)	(103.35)
3	Net ARR	3,380.17	4,141.82	3,513.48	3,566.41
4	Revenue from Sale of Power	3,474.55	3,508.80	3,514.91	3,562.86
5	Revenue gap/(surplus)	(94.38)	633.02	(1.43)	3.55

Separate revenue gap / (surplus) for Wires and Retail Supply are computed for each year and available in the main petition.



6 Tariff Philosophy

6.1 Past Recoveries of Revenue Gaps/ (Surplus) from FY 2019-20 to FY 2021-22

6.1.1 In this Petition BEST has submitted the True-up of FY 2019-20, True-up of FY 2020-21, True-up of FY 2021-22 and worked out the carrying cost/holding cost on the revenue gap/(surplus) and proposed recovery of the same in balance control period. The Carrying cost/ (Holding cost) rate considered is equal to Interest rate as applicable for working capital in line with MYT Regulations 2015/ 2019 and tabulated below:

Table 29: Carrying Cost on True-up years till FY 2023-24

Particulars - Interest Computation		FY2019-20	FY2020-21	FY2021-22	FY2022-23	FY2023-24
Carrying cost / (Holding Cost) Rate	A	9.66%	8.57%	8.50%	9.55%	9.55%
Opening Balance	B	-	(132.02)	(433.26)	(5.76)	(5.76)
Gap/(Surplus) Addition during the year	C	(132.02)	(301.24)	427.50	-	5.76
Less: Incentive	D	-	-	-	-	-
Closing Balance	E=(B+C-D)	(132.02)	(433.26)	(5.76)	(5.76)	-
Average Balance	F= Average (B,E)	(66.01)	(282.64)	(219.51)	(5.76)	(2.88)
Carrying cost / (Holding Cost) Cost	G=A*F	(6.37)	(24.23)	(18.66)	(0.55)	(0.27)
Total Carrying cost / (Holding Cost) Cost	H					(50.09)

6.1.2 The cumulative Revenue gap of Wires + Supply Business for all years including above computed carrying cost / (holding cost) is shown in the table below:

Table 30: Cumulative Revenue gap till FY 2024-25 including carrying / (holding) cost (Rs. Crore)

Particulars	Formula	Amount (Rs. Crs)
Final True Up Requirement for FY 19-20	1	(132.02)
Final True Up Requirement for FY 20-21	2	(301.24)
Final True Up Requirement for FY 21-22	3	427.50
Provisional True Up Requirement for FY 22-23	4	989.75
Revenue Gap for FY 23-24	5	633.02
Revenue Gap for FY 24-25	6	3.55
Carrying Cost	7	(50.09)
Total Revenue Gap for the MYT Period	8=sum(1 to 7)	1,570.47
		-
Financial Year	FY 2023-24	FY 2024-25
Revenue at Existing Tariff	3,508.80	3,562.86
Revenue at Proposed Tariff	4,224.36	4,417.51
Revenue Recovery	715.55	854.66
Total Additional Recovery	-	1,570.21



6.2 Recovery of revenue gap

6.2.1 BEST submits that recovery of revenue gap of Wire Business for past period along with ARR for FY 2023-24 and FY 2024-25 is proposed to be recovered through wheeling charges of the respective year. The recovery of the revenue gap/(surplus) for past period along with ARR of Supply Business for FY 2023-24 and FY 2024-25 is proposed to be recovered through fixed/demand charges and energy charges.

6.3 Wheeling charges

6.3.1 BEST has worked out the wheeling charges for the Fourth MYT control period as shown in the table below. The detailed methodology for the computation is detailed in main petition.

Table 31: Wheeling charges (HT - Rs./kVAh & LT – Rs./kWh)

Sr. No.	Particulars	2023-24	2024-25
1	ARR for Wires Business	946.12	1,048.35
2	GFA attributable to HT Network (%)	40.65%	40.65%
3	GFA attributable to LT Network (%)	59.35%	59.35%
4	Charge recoverable from HT & LT consumers	384.60	426.16
5	Charge recoverable from LT consumers	561.52	622.20
6	HT Sales (MU)	647.33	647.33
7	LT Sales (MU)	3,944.89	3,988.10
8	Total Sales (MU)	4,592.22	4,635.43
9	Charge recoverable from HT consumers	54.21	59.51
10	Charge recoverable from LT consumers	891.90	988.84
11	HT Wheeling Charge (Rs. /unit)	0.84	0.92
12	LT Wheeling Charge (Rs. /unit)	2.26	2.48

Note: Rate of wheeling charge for HT is in Rs./kVAh and LT is in Rs.kWh

6.4 Fixed/Demand charges

6.4.1 Out of ARR of Supply Business, roughly fixed cost is 47% to 51% during FY 20-21 to FY 24-25 and the recovery is approx. 38%-41% as per the existing tariff. The working of the same is provided in the main Petition. In order to meet the expenses related to fixed in nature, recovery of the same need to be done through fixed charges/demand charges.

Table 32: Recovery from Fixed/Demand Charges

Particulars	FY 2019-20 (True-up)	FY 2020-21 (True-up)	FY 2021-22 (True-up)	FY 2022-23 (Prov.true-up)	FY 2023-24 (Proposed Tariff)	FY 2024-25 (Proposed Tariff)
Supply ARR including past gap (A)	2,701.06	1,852.83	2,769.40	4,005.48	3,902.39	3,369.42
Variable cost of PP (including past gap) (B)	1,683.79	1,018.56	1,729.93	2,823.56	2,128.28	1,576.73
Fixed cost (Other elements + Fixed cost of PP) (C=A-B)	1,017.27	834.27	1,039.48	1,181.92	1,774.10	1,792.70
Proportion of fixed charges in Supply ARR (including gap)	38%	45%	38%	30%	45%	53%
Revenue from Fixed/ Demand Charges (D)	391.45	391.85	429.49	567.49	867.25	916.27
Recovery of Fixed cost from Fixed charges/Demand charges (E=D/C)	38%	47%	41%	48%	49%	51%



6.4.2 BEST submits that as per proposed fixed charges, revenue from fixed/ demand charges would be able to recover the ~50% of the fixed cost for FY 2023-24 to FY 2024-25. Accordingly, BEST has proposed the category-wise fixed and demand charges for the period FY 2023-24 & FY 2024-25 as shown in the table below for the purpose of recovery from the consumers:

Table 33: Fixed/Demand charges for FY 2023-24 & FY 2024-25

Customer Category	Units	Existing	FY 2023-24		FY 2024-25	
			Proposed	%hike (y-0-y)	Proposed	%hike (y-0-y)
HT Category						
HT - I Industry	Rs./KVA/Month	355.00	470.00	32.39%	480.00	2.13%
HT - II Commercial	Rs./KVA/Month	355.00	470.00	32.39%	480.00	2.13%
HT - III Group Housing	Rs./KVA/Month	355.00	470.00	32.39%	480.00	2.13%
HT - IV (A) Railways	Rs./KVA/Month	355.00	470.00	32.39%	480.00	2.13%
HT - V (A) Public services (Govt. Hospital & Educational Institutions)	Rs./KVA/Month	355.00	470.00	32.39%	480.00	2.13%
HT - V (B) Public services (Others)	Rs./KVA/Month	355.00	470.00	32.39%	480.00	2.13%
HT - VI Electrical Vehicle	Rs./KVA/Month	70.00	70.00	0.00%	70.00	0.00%
Sub-total		-				
LT Category						
LT - I (A) Residential (BPL)	Rs./Con/Month	10.00	11.00	10.00%	12.00	9.09%
LT - I (B) Residential						
0-100 Units	Rs./Con/Month	80.00	110.00	37.50%	120.00	9.09%
101-300 Units	Rs./Con/Month	120.00	160.00	33.33%	170.00	6.25%
301-500 Units	Rs./Con/Month	120.00	160.00	33.33%	170.00	6.25%
> 501 Units	Rs./Con/Month	145.00	200.00	37.93%	210.00	5.00%
LT - II (a) Commercial	Rs./Con/Month	425.00	560.00	31.76%	580.00	3.57%
LT - II (b) Commercial >20 & <=50 kW	Rs./KVA/Month	355.00	470.00	32.39%	480.00	2.13%
LT - II (c) Commercial >50	Rs./KVA/Month	355.00	470.00	32.39%	480.00	2.13%
LT - III (A) Industry (upto 20 kW)	Rs./Con/Month	425.00	560.00	31.76%	580.00	3.57%
LT-III (b) Industrial	Rs./KVA/Month	355.00	470.00	32.39%	480.00	2.13%
LT - IV (A) Public Services - Govt. Hosp. & Edu. Institutions)	Rs./Con/Month	425.00	560.00	31.76%	580.00	3.57%
LT - IV (B) Public Services - Others	Rs./Con/Month	425.00	560.00	31.76%	580.00	3.57%
LT-V (A) Agriculture- Pumpsets	Rs./KVA/Month	40.00	50.00	25.00%	60.00	20.00%
LT-V (B) Agriculture- Others	Rs./KVA/Month	90.00	120.00	33.33%	130.00	8.33%
LT VI Vehicle Charging	Rs./KVA/Month	70.00	70.00	0.00%	80.00	14.29%
Sub-total						

Note: Proposed charges for FY 2023-24 are considered as Existing charges for FY 2024-25 for comparison

6.5 Energy charges

6.5.1 BEST has proposed increase in energy charges which would provide balance recovery of the ARR for FY 2023-24 and FY 2024-25 along with past period gap after considering above proposed fixed charges. The category-wise energy charges for FY 2023-24 & FY 2024-25 proposed by BEST are as follows:



Table 34: Energy charges for FY 2023-24 & FY 2024-25

Customer Category	Units	Existing	FY 2023-24		FY 2024-25	
			Proposed	%hike (y-0-y)	Proposed	%hike (y-0-y)
HT Category						
HT - I Industry	Rs./kVAh	6.38	6.12	-4.00%	6.19	1.00%
HT - II Commercial	Rs./kVAh	6.84	6.08	-11.07%	6.14	1.00%
HT - III Group Housing	Rs./kVAh	6.40	6.33	-1.04%	6.40	1.00%
HT - IV (A) Railways	Rs./kVAh	6.51	5.70	-12.41%	5.76	1.00%
HT - V (A) Public services (Govt. Hospital & Educational Institutions)	Rs./kVAh	6.16	5.82	-5.56%	5.93	2.00%
HT - V (B) Public services (Others)	Rs./kVAh	6.64	6.39	-3.79%	6.45	1.00%
HT - VI Electrical Vehicle	Rs./kVAh	5.00	4.99	-0.20%	4.99	0.00%
Sub-total						
LT Category						
LT - I (A) Residential (BPL)	Rs./kWh	2.44	1.22	-49.91%	1.23	1.00%
LT - I (B) Residential						
0-100 Units	Rs./kWh	2.07	1.90	-8.30%	1.92	1.25%
101-300 Units	Rs./kWh	5.20	4.77	-8.19%	4.81	0.75%
301-500 Units	Rs./kWh	8.39	7.83	-6.72%	7.88	0.75%
> 501 Units	Rs./kWh	10.15	9.53	-6.14%	9.60	0.75%
LT - II (a) Commercial	Rs./kWh	5.92	5.25	-11.25%	5.29	0.75%
LT - II (b) Commercial >20 & <=50 kW	Rs./kWh	5.96	5.01	-16.01%	5.03	0.50%
LT - II (c) Commercial >50	Rs./kWh	6.36	5.36	-15.79%	5.38	0.50%
LT - III (A) Industry (upto 20 kW)	Rs./kWh	5.51	4.78	-13.24%	4.83	1.00%
LT-III (b) Industrial	Rs./kWh	5.88	5.07	-13.83%	5.12	1.00%
LT - IV (A) Public Services - Govt. Hosp. & Edu. Institutions)	Rs./kWh	5.92	5.47	-7.65%	5.58	2.00%
LT - IV (B) Public Services - Others	Rs./kWh	5.93	5.47	-7.72%	5.53	1.00%
LT-V (A) Agriculture- Pumpsets	Rs./kWh	2.21	2.34	6.02%	2.37	1.00%
LT-V (B) Agriculture- Others	Rs./kWh	4.39	3.76	-14.36%	3.80	1.00%
LT VI Vehicle Charging	Rs./kWh	4.79	4.03	-15.87%	4.03	0.00%
Sub-total						

Note: The existing Energy Charge rate of FY 2022-23 are including the existing Fuel Adjustment Charges approved by the Hon'ble Commission in September 2022 FAC Order. Further, approved energy rate of FY 2023-24 in MYT are considered as base for projection of FY 2023-24 energy charges. Proposed charges for FY 2023-24 are considered as base for projection of FY 2024-25 energy charges for comparison.

6.6 Total Recovery of Revenue Gap through tariff hike:

6.6.1 BEST submits that it has proposed revenue from tariff to ensure full recovery of the above gap in next 2 years. However, it requests Hon'ble Commission to approve carrying cost/ (holding cost) for FY 2023-24 and FY 2024-25 depending upon approvals and final revenue gap to be computed for tariff recovery. BEST has proposed recovery of the revenue requirement for the period FY 2023-24 to FY 2024-25 along with past period gap is as follows:



Table 35: ARR from FY 2023-24 & FY 2024-25

Particulars	Units	Formula	FY 2023-24	FY 2024-25
Estimated Sales (HT sales in kWh)	MUs	1	4,579.60	4,622.81
Estimated Sales (HT sales in kVAh)	MUs	2	4,592.22	4,635.43
Stand-alone Aggregate Revenue Requirement	Rs. Crore	3	4,314.52	3,669.76
Recovery of gap/(surplus) of Approved by the Hon'ble Commission	Rs. Crore	4	(172.70)	(103.35)
Net ARR including past revenue gap/(surplus)	Rs. Crore	5	4,141.82	3,566.41
Revenue from existing tariff	Rs. Crore	6	3,508.80	3,562.86
Revenue Gap from Existing Tariff	Rs. Crore	7	633.02	3.55
ABR at Existing Tariff	Rs. /unit	8=5 / 2	7.64	7.69
Past Revenue Gap till FY 2022-23 including Carrying Cost	Rs. Crore	9	933.91	851.37
Net ARR including past revenue gap/(surplus)	Rs. Crore	10=5+9	5,075.73	4,417.78
Revenue at proposed Tariff	Rs. Crore	11	4,224.36	4,417.51
Cumulative Revenue gap/(surplus) at proposed	Rs. Crore	12	851.37	0.26
Proposed ABR	Rs. /unit	13 =11 / 2	9.20	9.53
Tariff Hike Proposed w.r.t previous year*	%	14	14.12%	3.60%
ACoS	Rs. /unit	15=10 / 2 * 10	11.05	9.53

6.7 Cross Subsidy

6.7.1 The category-wise cross-subsidy proposed for FY 2023-24 & FY 2024-25 is as shown in table below:



Table 36: Category wise Cross-Subsidy Percentage for FY 2023-24 & FY 2024-25 (%)

Category	FY 23-24	FY 24-25
HT Category		
HT-1 Industrial	79%	93%
HT-2 Commercial	91%	108%
HT-3 Group Hsg	79%	94%
HT-4 Railway Metro	117%	140%
HT 5A Govt Sch & Hosp.	77%	91%
HT 5B Public Ser. Oths	85%	101%
HT 6 EV chg.	0%	0%
LT Category		
LT-1 A (BPL)	33%	41%
LT-1 B Residential		
0-100	43%	53%
101-300	72%	87%
301-500	95%	113%
501<	108%	129%
LT2 (a)Comm <20	86%	104%
LT2 (b) 20-50 Comm.	130%	158%
LT2 (c) >50 Comm.	131%	159%
LT3A Industrial <20 kW	68%	83%
LT 3B >20 Industrial	107%	130%
LT-4A Schools & Hosp	71%	85%
LT-4B Public Service	72%	87%
LT 5A Agriculture Pumpset	0%	0%
LT 5B Agriculture Other	55%	66%
LT-11 Vehicle Chg	57%	68%

- 6.7.2 **Time of Day Tariff:** - BEST proposes to continue with the prevailing Time of Day Tariff for the balance MYT Control period.
- 6.7.3 **Green Power Tariff:** - BEST requests Commission to continue the existing Green Power Tariff of Rs. 0.66/kWh for the consumer opting for meeting its 100% of power requirement through Renewable energy sources.
- 6.7.4 **Grid Support Charges:** - BEST has proposed Grid Support Charges. The detailed computation of the same is provided in main Petition.
- 6.7.5 **kVAh Billing:** - BEST will be giving priority for replacement of consumer meters with load above 20 kW, while execution the AMI Project. After replacement of meter, BEST will submit the proposal for kVAh billing for LT consumers with load above 20 kW in the next MYT Petition.
- 6.7.6 **Schedule of Charges:** - BEST has not proposed any revision in its existing Schedule of Charges in the present Petition except from Lost/Burnt Smart Meters.



7 Compliance of directives

7.1.1 The Hon'ble Commission in various Orders has given directives to be implemented by BEST. The status of compliance is explained in the Main Petition and its summary for major directives is provided below:

- a. BEST is expediting the process of replacing the Electro-mechanical meters with Electronic Meters at a high year-on-year growth rate. Further, BEST has proposed Smart Metering to all its consumers.
- b. With regards to delay in bill generation, BEST has proposed Smart Metering to all its consumers. After implementation of this scheme, overall billing process will be expedited due to automation. The same activity will also address the kVAh billing for consumer categories having load above 20 kW.
- c. With regards to expiry of PPA with TPC-G and arranging RE power, BEST has filed a Power Procurement Plan petition including Renewable Power options for the approval of Hon'ble Commission on FY 20.12.2022.
- d. BEST has submitted the impact of wage revision for past period in the true-up of FY 2019-20 to FY 2020-21 period for kind consideration of Hon'ble Commission.
- e. BEST has complied with directions related to TOD study report.
- f. Other Compliances to various directives given by the Hon'ble Commission are given in detail in the Main Petition



8 Prayers

8.1.1 In the circumstances and for the reason mentioned above, BEST respectfully submits and prays for the following relief:

- 1) Admit the MTR Petition for Fourth MYT Control Period in accordance with Regulation 5.1 (b) of the MERC (Multi Year Tariff) Regulations, 2019;
- 2) Approve the final true-up for FY 2019-20, FY 2020-21, FY 2021-22 and provisional true-up of FY 2022-23 and consequential revenue gaps for the claim in accordance with MERC (MYT) Regulations, 2015 and MERC (MYT) Regulations, 2019, as submitted by BEST;
- 3) Approve the Revised ARR and Tariff for Fourth MYT Control Period from FY 2023-24 to FY 2024-25 as proposed by BEST;
- 4) Approve mechanism for recovery of computed revenue gap along with carrying cost and Tariff Schedule considering the Tariff Design principles and other suggestions proposed by BEST;
- 5) Verify the Compliance of RPO targets by BEST for FY 2020-21 and FY 2021-22 under RPO Regulations 2019 as per the directives of Hon'ble Commission in its Order dated 07.09.2021 in Case No. 50 of 2021, mentioned in Section 3 of the petition;
- 6) Allow power procurement from SECI from January 2024 as the delay is caused by CTU transmission constraints which are uncontrollable in nature;
- 7) Allow BEST to carry forward the shortfall in RPO compliance of 4th control period, if any, to the next control period considering surplus tied up capacity (SECI 400 MW Hybrid Power & SECI – 234 MW Solar Power);
- 8) Condone the delay in Investment of the amount of Contribution to Contingency reserves for FY 2020-21 and FY 2021-22;
- 9) Consider the request of BEST to allow wage revision expenses as uncontrollable factor in the True-up of FY 2020-21 & FY 2021-22 and COVID-19 related expenses as uncontrollable factor in the True-up of FY 2020-21 and accordingly allow sharing of gains & losses;
- 10) Consider the request of BEST in terms of certain claims made in the petition on actual basis rather than normative considering Covid-19 pandemic situation affecting BEST in the true-up period of FY 2019-20 to FY 2021-22;
- 11) Allow recovery as per Case no.163 of 2020 to BEST for past standby charges paid to TPC-G along with carrying cost in future Power purchase bill of FY 2023-24;
- 12) Consider Smart Meter Scheme expenses under Opex Scheme and allow Smart Meter Scheme expenses over & above normative O&M expenses in accordance with Regulations 84.7 of MYT Regulations, 2019;



- 13) Allow to continue the existing Green Power Tariff of Rs. 0.66/kWh the consumer opting for meeting its 100% of power requirement through RE sources.
- 14) Approve the Grid Support charges proposed by BEST, mentioned in Section 8.10 of the petition
- 15) Approve the Lost/Burnt meter charges proposed by BEST, mentioned in Section 8.11 of the petition;
- 16) To extend the applicability of HT V(B) – Public Services (others) category to lighting of public streets/ thorough fares which are open for use by the general public.
- 17) Condone any inadvertent omission / errors and grant the liberty to BEST to add/ change/ modify /alter this petition and make further submissions as may be required at a future date;
- 18) Pass such further and other orders, as the Hon'ble Commission may deem fit and proper, keeping in view the facts and circumstances of the case.

NETAJI NAMDEO
CHOUGULE

Digitally signed by NETAJI
NAMDEO CHOUGULE
Date: 2023.01.17 00:34:24
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Chief Engineer (Regulatory)