

BEFORE MAHARASHTRA ELECTRICITY REGULATORY COMMISSION, MUMBAI

Filing No.: _____

Case No.: _____

IN THE MATTER OF

PETITION OF MAHARASHTRA STATE ELECTRICITY DISTRIBUTION CO. LTD. FOR PROVIDING MECHANISM FOR RECOVERY OF CHARGES INCURED ON ACCOUNT OF OVER-DRAWL OF INDIAN RAILWAYS FROM THE GRID

AND

IN THE MATTER OF

SECTION 38 OF THE MERC (STATE GRID CODE) REGULATIONS 2006;

AND

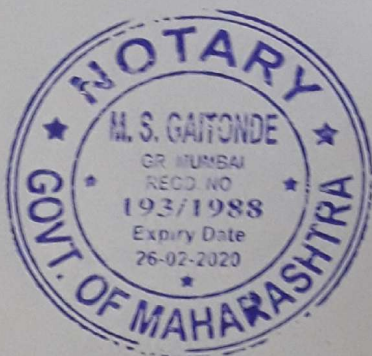
IN THE MATTER OF

SECTION 92 AND 94 OF THE MERC (CONDUCT OF BUSINESS) REGULATIONS 2004;

AND

IN THE MATTER OF

MAHARASHTRA STATE ELECTRICITY DISTRIBUTION COMPANY LIMITED, PRAKASHGAD,
BANDRA (EAST), MUMBAI, 400051 ----- PETITIONER



Affidavit on behalf of Maharashtra State Electricity Distribution Company Limited.

I, Satish Chavan, aged 51 Years, son of Vitthalrao Chavan, having my office at MSEDCL, Prakashgad, Plot No.G-9, Anant Kanekar Marg, Bandra (E), Mumbai-400051 do solemnly affirm and say as follows:

I am Chief Engineer (Power Purchase) of Maharashtra State Electricity Distribution Co. Ltd., the Petitioner in the above matter and am duly authorized by the said Petitioner to make this affidavit.

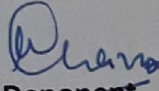
The statements made in the enclosed petition are made based on the information received from the concerned officers of the Company; which is shown to me and I believe them to be true.

I say that there are no proceedings pending in any court of law/tribunal or arbitrator or any other authority, wherein the Petitioner is a party and where issues arising and /or relief sought are identical or similar to the issues arising in the matter pending before the Commission.

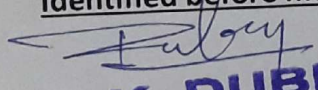
I solemnly affirm at Mumbai on this ^{19th} day of August 2016, that the contents of this affidavit are true to my knowledge, no part of it is false and nothing material has been concealed there

from

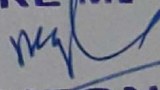


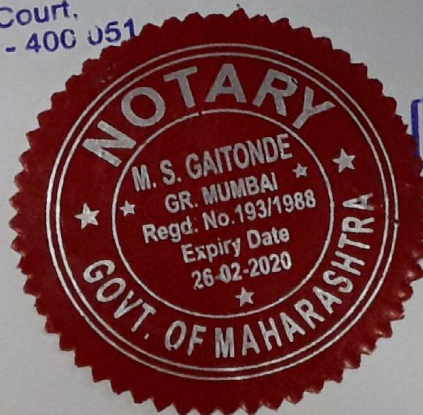
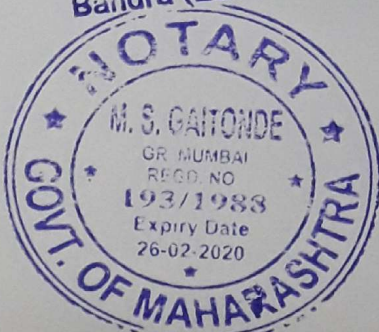

Deponent
Chief Engineer (Power Purchase)
M. S. E. D. C. L.

Identified before me


P. K. DUBEY
B.A.L.L.B.
ADVOCATE HIGH COURT
Lawyer's Chamber Bhaskar Bldg.,
2nd Floor, Bandra Court,
Bandra (East), Mumbai - 400 051

BEFORE ME


M. S. GAITONDE
B.A.L.L.B.
NOTARY
GREATER MUMBAI
GOVT. OF MAHARASHTRA
INDIA



NOTED	REGISTER
Sr. No. 2134	19-8-2016

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BANDRA (EAST), MUMBAI 400051----- PETITIONER

The Petitioner most respectfully submits as under:

1. **Background**

- 1.1. Maharashtra State Electricity Distribution Co. Ltd. (hereinafter to be referred to as "MSEDCL" or "the Petitioner") has been incorporated under Indian Companies Act, 1956

pursuant to decision of Government of Maharashtra to reorganize erstwhile Maharashtra State Electricity Board (herein after referred to as "MSEB"). The Petitioner submits that the said reorganization of the MSEB has been done by Government of Maharashtra pursuant to "Part XIII – Reorganization of Board" read with section 131 of The Electricity Act 2003. The Petitioner has been incorporated on 31.5.2005 with the Registrar of Companies, Maharashtra, Mumbai and has obtained Certificate of Commencement of Business on 15th Sep 2005. The Petitioner is a Distribution Licensee under the provisions of the Electricity Act, 2003 (EA, 2003) having license to supply electricity in the State of Maharashtra except some parts of city of Mumbai.

1.2. MSEDCL is a Company constituted under the provisions of Government of Maharashtra, General Resolution No. PLA-1003/C.R.8588/Energy-5 dated 25th January 2005 and is duly registered with the Registrar of Companies, Mumbai on 31st May 2005.

1.3. MSEDCL is functioning in accordance with the provisions envisaged in the Electricity Act, 2003 and is engaged, within the framework of the Electricity Act, 2003, in the business of Distribution of Electricity to its consumers situated over the entire State of Maharashtra, except some parts of city of Mumbai.

1.4. MSEDCL submits that the Indian Railways is a Department of the Ministry of Railways, Government of India which operates the rail systems in India as per the provisions of the Railways Act, 1989 (hereinafter "Railways Act"). Section 2(31) of the Railways Act defines the term "Railways" as "a railway, or any portion of a railway, for the public carriage of passengers or goods," and includes among others "all electric traction equipment, power supply and distribution installation used for the purposes of, or in connection with, a railway".

1.5. MSEDCL has further submitted that under third proviso to Section 14 of the Electricity Act, if the Central Government and State Governments transmit electricity or distribute electricity or undertake trading in electricity, such Government shall be deemed to be a

licensee under the Electricity Act and shall not be required to obtain license under the Electricity Act.

- 1.6. MSEDCL submits that the Ministry of Power, Government of India, in its letter dated 6.05.2014 has clarified the position/status of Indian Railways as a "deemed licensee" under the Electricity Act. As a deemed licensee, the petitioner is entitled to procure electricity from any source of its choice including a Generating Company, a Captive Generating Plant, a Trader or through Power Exchange to meet the electricity requirements, as the petitioner may consider appropriate. In terms of the authority vested under Section 11 of the Railways Act, the petitioner can also lay down transmission lines from the place of generation or the place of interconnection of any Network to the facilities where the electricity procured is to be injected. The Generating Companies and/or the Captive Generating Plants supplying electricity to the Indian Railways can also lay down dedicated transmission lines as per the scheme envisaged under Sections 9 and 10 of the Electricity Act.
- 1.7. As per Hon'ble CERC's Order in Petition No. 197/MP/2015, it was held that all the concerned RLDCs, State Transmission Utilities and SLDCs are directed to facilitate long term access and medium term access in terms of Connectivity Regulations from the generating stations or other sources to the facilities and networks of Indian Railways.

2. Provisions under Final Balancing and Settlement Code

- 2.1. MSEDCL submits that as per the Final Balancing and Settlement Code, State Pool Participant refers to the Market Participants of Maharashtra Electricity Market who meet the conditions for membership of Pool, subject to fulfilment of qualification criteria or covenants for Pool participation as set out under the Commission's Order. Currently, it is envisaged that the Distribution Licensees, the Transmission Open Access Users and the Merchant Generators selling Power outside the State (subject to fulfilment of qualification criteria or covenants for Pool participation) operating within

electricity market of Maharashtra in accordance with the terms and conditions outlined under the Commission's Order and under this code shall be the State Pool Participants.

2.2. MSEDCL submits that Railways is a State Pool Participant under the FBSM Mechanism as per the status of being a deemed distribution licensee.

2.3. As per Clause 4.3 of the Final Balancing and Settlement Code, Covenants of State Pool Participation,

"The State Pool Participants need to follow some covenants in order to fulfil an objective of an effective operationalization of the market. The list of such covenants is as follows:

(a)...

(b)...

(c)...

*(d) The State Pool Participants shall **operate their equipment / loads in a manner that is consistent with the provisions of the Indian Electricity Grid Code and the State Grid Code.***

(e) The State Pool Participants shall enter into BPTA (Bulk Power transmission agreement) and Connection Agreement with the concerned transmission licensee (MSETCL or TPC-T or RINFRA-T or any other transmission licensee in the state, as case may be), which shall specify the physical and operational requirements for a reliable operation and gain physical access and connection to the intra-State transmission system (InSTS).

(f) The MSLDC-OD shall publish all such information as required for all other State Pool participants to be aware of the energy exchanges taking place within the pool as well as exigency conditions, if any. Such information shall include, but not limited to, scheduling data, Ex-Ante price on a day-ahead basis, frequency of updation of any such information published on the site, etc..



3. Provisions under power system development fund (PSDF) Scheme

Ministry of Power has notified a scheme for utilization of Gas based power generation capacity on 27th March, 2015 for FY 2015-16 and FY 2016-17. Around 14,305 MW of capacity has been classified as 'stranded gas based plants' due to non-availability of domestic gas. The scheme envisages financial support to buy imported gas for the stranded gas plants under Power System Development Fund (PSDF). The outlay for the support from PSDF is fixed at Rs 7,500 crore (Rs 3,500 crore and Rs 4,000 crore for 2015-16 and 2016-17 respectively). The PSDF support is apportioned between stranded plants and plants receiving domestic gas.

Particulars	FY 2015-16	FY 2016-17
Stranded Plants	Rs. 3000 Cr	Rs. 3500 Cr
Plants receiving domestic gas	Rs. 500 Cr	Rs. 500 Cr

The auctions were held for allocation of gas as per the details given below.

Auctions	Duration of supply	Total Capacity which secured gas allocation
1 st Phase (May, 2015)	June 1 to September 30, 2015	10,270 MW
2 nd Phase (September, 2015)	October 1, 2015 to March 31, 2016	11,717.72 MW

- 3.1. Under the above scheme, RGPPL has secured gas and has tied up for supply of power to the Railways for a quantum of 620 MW. Indian Railway is utilising this power in the state of Maharashtra, Gujrat, Madhya Pradesh and Jharkhand.
- 3.2. The CERC and MERC have notified regulations exempting transmission charges and losses for generation of power from e-RLNG (Re-Gasified Liquefied Natural Gas) bid.

- 3.3. CERC has amended the sharing of inter-state transmission charges regulations vide CERC (Sharing of inter-State Transmission Charges and Losses) (Fourth Amendment) Regulations, 2015 to come into force from 01st June, 2015.

"2. Amendment to Regulation 7 of the Principal Regulations:

The following sub-clauses shall be added after sub-clause (v) of clause (1) of Regulation 7 of the Principal Regulations:

"(w) No transmission charges for the use of ISTS network shall be payable which is attributed to incremental gas based generation from e-bid RLNG for the years 2015-16 and 2016-17 in accordance with the scheme notified by the Government of India vide Office Memorandum No. 4/2/2015.Th.1 dated 27.3.2015.

(x) No transmission losses for the use of ISTS network shall be payable which is attributed to incremental gas based generation from e-bid RLNG for the year 2015-16 and 2016-17 in accordance with the scheme notified by the Government of India vide Office Memorandum No. 4/2/2015.Th.1 dated 27.3.2015."

- 3.4. MERC has notified the MERC (Implementation of Scheme for utilization of Gas-based power generation capacity) Regulations, 2016 on 20th January, 2016 to come in to force from 21st November, 2015. The relevant excerpts of the regulations are reproduced below.

" 3. Exemption of transmission charges and losses only for generation from the e-bid RLNG

3.1 No transmission charges for the use of InSTS network shall be levied on incremental gas based generation from e-bid Re-gasified Liquefied Natural Gas (RLNG) for the Financial Years 2015-16 and 2016-17 in accordance with the Scheme:

Provided that the Transmission System Users who share the Total Transmission System Cost of InSTS on the basis of their respective contribution to average CPD and NCPD shall continue to pay their share as determined by the Commission from time to time in its Intra-State Transmission Tariff Orders.



3.2 No transmission losses for the use of InSTS network shall be attributed to incremental gas based generation from e-bid RLNG, for the Financial Years 2015-16 and 2016-17, in accordance with the Scheme and shall be apportioned to other Transmission System Users.

3.3 All other provisions of the Regulations of the Commission governing Transmission Open Access shall be applicable for use of the InSTS network for transmission of incremental Gas-based power generation from e-bid RLNG. “

3.5. There have been instances of tripping of RGPPL plant. Since Indian Railways has not made any arrangement of standby power, this has resulted in over-drawl of power from the grid by Railways. It is submitted that such events occurring frequently affect the Grid of the State as well as financially impact utilities including MSEDCL under CERC DSM Regulations. Further, more seriously, such over drawl may lead to power deficit situation to the existing consumers of MSEDCL.

3.6. Hence, Railways, being a part of State Pool Participant through this over-drawl has not fulfilled the obligations towards maintaining the grid stability. Thus, MSEDCL requests the Hon'ble Commission to take suitable measures to ensure that such instances of over-drawl by Railways doesn't occur frequently. In case such situation happens frequently then it may result in grid instability and increase in voltage level losses. Hence, MSEDCL requests the Hon'ble Commission to devise a suitable structure whereby the impact of over-drawl of power on the utilities including MSEDCL can be controlled and such impact shall completely passed on to the Indian Railways

4. Deviation Settlement Mechanism and related matters Regulations, 2014

4.1. As per the Hon'ble CERC (Deviation Settlement Mechanism and related matters) Regulations, 2014, the table of charges:



Table – A	
When 12% of Schedule is less than or equal to 150 MW	
For over drawl of electricity by any buyer in excess of 12% and up to 15% of the schedule in a time block	Equivalent to 20% of the Charge for Deviation corresponding to average grid frequency of the time block.
For over drawl of electricity by any buyer in excess of 15 % and up to 20% of the schedule in a time block	Equivalent to 40% of the Charge for Deviation corresponding to average grid frequency of the time block.
For over drawl of electricity by any buyer in excess of 20 % of the schedule in a time block	Equivalent to 100% of the Charge for Deviation corresponding to average grid frequency of the time block.
When 12% of Schedule is more than 150 MW	
For over drawl of electricity by any buyer is above 150 MW and up to 200 MW in a time block	Equivalent to 20% of the Charge for Deviation corresponding to average grid frequency of the time block.
For over drawl of electricity by any buyer is above 200 MW and up to 250 MW in a time block	Equivalent to 40% of the Charge for Deviation corresponding to average grid frequency of the time block.
For over drawl of electricity by any buyer is above 250 MW in a time block	Equivalent to 100% of the Charge for Deviation corresponding to average grid frequency of the time block.

4.2. CERC vide order dated 05/01/2015 has issued the statement of reasons towards DSM regulation 2014. The relevant clauses in respect of grid discipline are as under

5.3(f) The regulations seek to improve the grid discipline and help the States to initiate forecasting of demand and schedule in more accurate manner. One of the main reasons for the discipline has been the provisos in question which strictly prohibit deviation from the schedule when the frequency is too low or too high.

5.3 (i) Recommendation of the enquiry committee report on Grid Disturbance of 30th and 31st July 2012 – The Enquiry Committee in its Report dated 16th August 2012, while identifying various factors responsible for grid disturbance had observed that in the interest of power quality and grid security, there is a definite need to operate the system at and very close to 50 Hz. If more and more numbers of utility players resort to over draw/ under drawl, it may even lead to load encroachment phenomena and grid disturbance, as has been observed in recent grid disturbance.



4.3. It is respectfully submitted that the above deviation is allowed to take care of slight variation in demand-supply and it is not for meeting entire demand from overdrawing from the grid.

4.4. Subsequently on 06th May, 2016 CERC has notified the third amendment to CERC DSM regulations notifying CERC (Deviation Settlement Mechanism and related matters) (Third Amendment) Regulations, 2016.

4.5. As per the amendment a new term 'renewable rich state' has been introduced and has been defined as follows. Maharashtra has been declared as a renewable rich state as per the definition.

"(m-i) Renewable Rich State means a State whose minimum combined installed capacity of wind and solar power is 1000 MW or more.

Note: Combined installed capacity shall be reckoned on the basis of the capacity installed as on the last day of the month for the purpose of deciding the installed capacity for the next month.

4.6. The deviation charges have also been amended for renewable rich state and the limit has been increased to 250 MW for states having combined installed capacity of wind and solar projects > 3000MW.

Table III: For a renewable rich state

(i)	For over-drawl/under injection of electricity above L MW and up to L+50 MW in a time block	Equivalent to 20% of the Charge for Deviation corresponding to average grid frequency of the time block.
(ii)	For over-drawl / under-injection of electricity above L+50 MW and up to L+100 MW in a time block	Equivalent to 40% of the Charge for Deviation corresponding to average grid frequency of the time block.
(iii)	For over-drawl / under-injection of electricity above L+100 MW in a time Block	Equivalent to 100% of the Charge for Deviation corresponding to average grid frequency of the time block.

Note: "L" shall be as specified in Annexure-III of these Regulations.



Annexure-III

Deviation Limits for Renewable Rich States

Sr. No.	States having combined installed capacity of Wind and Solar projects	Deviation Limits (MW)- "L"
1.	1000-3000MW	200
2.	>3000MW	250

4.7. MSEDCL submits that every utility shall maintain grid discipline by matching their demand-supply. With respect of railways, during tripping period of RGPPL generating station, entire power is being over-drawn from the grid to meet its demand without arranging any standby power or procurement of power from other sources. This results into over-drawl by the state by more than 250 MW. As a result, any marginal over-drawl by the other utility also attracts huge penalty under DSM mechanism due to the existence of huge over-drawl quantum. There are many incidences of Tripping of RGPPL units from Feb-2016 onwards. The SLDC is issuing bills towards over-drawl quantum calculated as per FBSM. At present provisional bills against FBSM for the month of July, 2015 and final bills for the month of Feb, 2013 are issued. At present, the calculation of over-drawl quantum and deviation penalty towards DSM mechanism beyond July-2015 is not readily available.

4.8. SLDC on dated 28th March, 2016 wrote a letter to Indian Railway stating that there were three incidences of tripping of RGPPL plant on 18th Feb, 12th March and 27th March, 2016 and Railways have drawn power from grid in absence of stand-by or back-up power. Such an unscheduled drawl is a matter of serious concern and SLDC requested Indian Railways to make standby power supply arrangement with immediate effect.

4.9. MSEDCL on dated 9th June, 2016 wrote a letter to SLDC stating that RGPPL power generated from e-bid RLNG does not attract transmission charges and losses as per MERC regulation dated 20th January, 2016. MSEDCL further states that over-drawl quantum of power by Indian Railways is not from e-bid RLNG, hence shall attract transmission charges and losses. The over-drawl quantum by Indian Railway during 2015-May 2016 was 60.62 MUs. Hence SLDC was requested to recover the transmission



charges from the Indian Railway and to pass on the applicable transmission losses on over-drawl quantum.

5. Transmission capacity Rights

5.1. Regulation 61.2 of the MERC MYT Regulations 2015 specifies that the Commission shall approve the Base Transmission Capacity Rights as the average of co-incident peak demand (CPD) and non-coincident peak demand (NCPD) for Transmission System Users as projected for the 12-monthly period of each year of the Control Period.

61.2 The Commission shall approve yearly 'Base Transmission Capacity Rights' as average of Coincident Peak Demand and Non-Coincident Peak Demand for TSUs as projected for 12 monthly period of each year (t) of the Control Period, representing the 'Capacity Utilisation' of Intra-State transmission system and accordingly determine yearly 'Base Transmission Tariff', in accordance with the following formula :-

Base Transmission Capacity

Rights (Base TCR) for the

yearly period (t)

$$= \sum_{t=1}^{12} [(CPD(t) + NCPD(t))/2]$$

Where,

$CPD_{(t)}$ = Average of projected monthly Coincident Peak Demand for the yearly period (t) of Control Period for each Transmission System User (u)

$NCPD_{(t)}$ = Average of projected monthly Non-Coincident Peak Demand for the Yearly period (t) of Control Period for each Transmission System User (u) :

Accordingly, the Base TCR of the Distribution Licensees has been re-determined for FY 2015-16, based on the average of the CPD and NCPD of the Distribution Licensees in FY 2014-15, as shown in the Table below:

TSU - Distribution Licensees	FY 2015-16	
	Transmission Capacity Rights (MW)	Sharing Proportion for TTSC (%)
MSEDCL	15,404	83.05%
TPC-D	930	5.01%
RInfra-D	1,366	7.36%
BEST	847	4.57%
TOTAL	18,547	100.00%



The Intra-State Transmission Charges for FY 2015-16 shall be shared by the Distribution Licensees in accordance with their respective contributions to the average of CPD and NCPD. As per Regulation 3 of the MERC (Implementation of Scheme for Utilization of Gas-based Power Generation Capacity) Regulations, 2015, the Central Railway is exempted from paying Transmission Charges for the gas-based power sourced from RGPPL. However, Railways being in MSEDCL Area, for the over-drawl done by Railways, the transmission charges are already loaded on MSEDCL in accordance with its contributions to the average of CPD and NCPD. Thus, MSEDCL is being burdened with the transmission charges and losses pertaining to the quantum of power being drawn and over-drawn by Railways.

MSEDCL submits that currently, under the PSDF Scheme, the power generated from gas based power project is exempt from transmission charges and losses. However, to the extent of power over drawl from the grid by Indian Railway, MSEDCL is paying transmission charges and losses which is borne by the existing consumers of MSEDCL.

6. MSEDCL submits to the Hon'ble commission that there have been many instances of tripping of RGPPL Power project whereby Railways have over-drawn the power from the Grid despite arranging power from other sources. Also Indian Railway is overdrawing the power on regular basis. All such over draws from the grid attract transmission charges and losses thereof for which MSEDCL is paying to MSETCL through ARR. The details of tripping events of RGPPL units are as under:

Sr No	Tripped RGPPL unit No	Date and Time of tripping (mm/dd/yy time)	Installed Capacity (MW)
1	2B	2/18/2016 4:25	210
2	2A	2/18/2016 4:25	210
3	2A	3/12/2016 1:39	210
4	2A	3/27/2016 8:33	210
5	2B	3/27/2016 8:59	210
6	2A	3/27/2016 19:25	210
7	3X	5/7/2016 18:40	240
8	2A	6/1/2016 17:50	210
9	2B	6/1/2016 17:50	210
10	2A	6/12/2016 19:58	210
11	2X	6/12/2016 19:59	240



In addition to above tripping, RGPPL also overdraws much power during change-over of the units. In some of the occasion during the tripping of RGPPL units, RGPPL is revising their generation schedule up to the actual generation thereby the drawl schedule of Indian Railway is being revised, however Indian Railway is continuously over-drawing the additional power from the grid and such over-drawl attracts the penalty through DSM mechanism on other utilities also who are marginally overdrawing power from the grid. The incidences of tripping of RGPPL units and over drawl from the grid by Indian Railway which attracted penalty through DSM mechanism is as under.

Sr No	Tripped RGPPL unit No	Date and Time of tripping	Generation before Tripping (MW)	Generation after Tripping (MW)	Sync RGPPL unit No	Date and Time of sync	No of hours	Over drawl by IR (Mus)
1	2A	3/12/2016 1:39	457	295	2A	3/12/2016 15:22	13.72	0.9
2	2A	3/27/2016 8:33	500	0	2A	3/27/2016 14:19	5.77	0.765
	2B	3/27/2016 8:59	500		2B	3/27/2016 10:54	1.92	
	2A	3/27/2016 19:25	500		2A	3/27/2016 20:54	1.48	
3	3X	5/7/2016 18:40	513	295	2B	5/8/2016 0:58	6.30	1.401
4	2A	6/1/2016 17:50	507	281	2B	6/1/2016 19:27	1.62	0.143
5	2A	6/12/2016 19:58	504	299	2X	6/13/2016 0:54	4.93	0.292
Total								3.501

7. MSEDCL also submit to the Hon'ble commission that as stated above Indian Railways is regularly overdrawing power from the grid in normal situations as well as during tripping of RGPPL units and this over-drawn power is accounted on MSEDCL for payment of transmission charges through ARR of MSETCL. Thus Indian Railways should reimburse the transmission charges to MSEDCL at the rate applicable to short term power. The month wise over-drawl in MUs by Indian Railway is as under.



Over drawl (Provisional) by Railways during Dec, 2015 to May, 2016

Month	Dec-15	Jan-16	Feb-16	Mar-16	Apr-16	May-16	Total
Over-drawl by Railways for Dec-15 to May-16 (MUs)	4.74	8.79	9.39	13.45	13.16	11.13	60.66

8. Mechanism to recover charges incurred due to over-drawl

The transmission charges and losses thereof and penalty towards DSM mechanism on over-drawl quantum from the grid by Indian Railway are presently accounted on MSEDCL. Hence, MSEDCL requests the Hon'ble Commission to devise a suitable mechanism by which MSEDCL can recover transmission charges, transmission losses, charges and penalties if any on account of DSM Regulations from Indian Railway for over-drawl of power from the Grid.

9. Stand-by Arrangement – Mechanism for providing power back-up facilities

As per Hon'ble Commission's Order dated October 20, 2006, in the matter of Tariff Determination of MSEDCL for 2006-07, MSEDCL recovers standby charges from TPC, REL and BEST for providing back-up facilities in emergency situations. Further, there are applicable penalty charges in case of over-drawl of power from the grid. MSEDCL request to the Hon'ble Commission to devise similar kind of arrangement between MSEDCL and Railways such that in future during instances of power requirement, MSEDCL can supply to Railways a suitable quantum against the recovery of the Standby charges. This would go a long way to sustain grid stability and ensure that other consumers of MSEDCL are not burdened with additional tariff due to additional charges/ losses and penalties

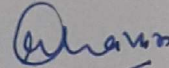
10. Prayers

In view of the above the Petitioner respectfully prays to the Hon'ble Commission:

- To admit the Petition as per the provisions of the Regulation;
- To consider the concern submitted by the Petitioner in respect of arranging the standby power by Indian Railway;
- To consider the concerns submitted by the Petitioner in providing a mechanism for recovery of transmission charges and losses thereof;



- d) To provide a suitable mechanism for recovery of penalties on account of DSM Regulations due to over-drawl of power by Railways from the grid;
- e) To pass any other order/relief as the Hon'ble Commission may deem fit and appropriate under the circumstances of the case and in the interest of justice;
- f) Condone any error/omission and to give opportunity to rectify the same.



Chief Engineer (Power Purchase)

MSEDCL



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Website : www.mahadiscom.in

PLOT NO. G-9, PRAKASHGAD,
Prof. ANANT KANEKAR MARG,
BANDRA (E), MUMBAI-400 051.

Ref. No.: CE/PP/IR/ 25729

Date: 19-08-2016

To,
The Secretary,
Maharashtra Electricity Regulatory Commission,
World Trade Centre, Centre No.1,
13th Floor, Cuffe Parade, Mumbai.

Subject: Petition for providing mechanism for recovery of charges incurred on account of over-draw of Indian Railway from the Grid.

Sir,

Maharashtra State Electricity Distribution Company Limited (MSEDCL) is hereby submitting the Petition for providing mechanism for recovery of charges incurred on account of Over-draw of Indian Railway from the Grid. The necessary fees as per MERC (Fees & Charges) Regulations 2004, of Rs. 10,000/- (Ten Thousand only) vide Demand Draft no. dated drawn on Bank of Maharashtra, Mumbai payable at Mumbai is also enclosed herewith.

This may please be taken on record & be placed before Hon'ble Commission for appraisal.

Thanking you.

Encl: As above

Yours faithfully,

Chief Engineer (Power Purchase)
MSEDCL

*Mr. S. S. ...
19-08-2016*

*PD issue ...
19-08-2016*