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

Ref. No.: SE/TRC/M-182/ No 3 7 0 8 6

Date: 16 DEC 2016

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

Subject: Submission of Petition seeking review of the MYT Order dated 3rd November, 2016 in case no. 48 of 2016.

Sir,

Hon'ble Commission has passed order on 3rd November, 2016 in case no. 48 of 2016 filed by MSEDCL for Truing-up for FY 2014-15, Provisional Truing-up for FY 2015-16 and Multi-Year Tariff for 3rd Control Period FY 2016-17 to FY 2019-20. MSEDCL is hereby submitting Petition seeking review of the said MYT Order dated 3rd November, 2016 in case no. 48 of 2016 which is enclosed herewith. The necessary fees as per MERC (Fees & Charges) Regulations 2004, of Rs. 3,10,000/- (Rupees Three Lakhs Ten Thousand only) by Demand Draft no. 217282 dated 14th December 2016 is also attached herewith.

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

Thanking you.

Encl: As above

Yours faithfully



Executive Director (Commercial)
MSEDCL

BEFORE THE MAHARASHTRA ELECTRICITY REGULATORY COMMISSION,

MUMBAI



Filing No.: _____

Case No. : _____

IN THE MATTER OF

ORDER DATED 3RD NOVEMBER 2016 IN CASE NO. 48 OF 2016 IN THE MATTER OF PETITION OF MAHARASHTRA STATE ELECTRICITY DISTRIBUTION CO. LTD. FOR TRUING-UP FOR FY 2014-15, PROVISIONAL TRUING-UP FOR FY 2015-16 AND MULTI-YEAR TARIFF FOR 3RD CONTROL PERIOD FY 2016-17 TO FY 2019-20

AND

IN THE MATTER OF

SECTION 94 (1) (f) OF THE ELECTRICITY ACT, 2003;

AND

IN THE MATTER OF

REGULATION 85 (REVIEW OF DECISIONS, DIRECTIONS & ORDERS) OF MERC (CONDUCT OF BUSINESS) REGULATIONS, 2004;

AND

IN THE MATTER OF

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

Affidavit on behalf of Maharashtra State Electricity Distribution Company Limited.

00000001

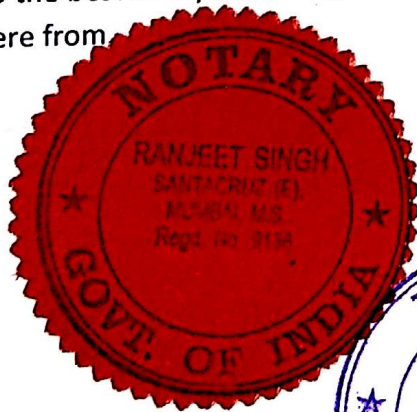
I, Satish Chavan, son of Vitthalrao Chavan, aged 51 years, having my office at MSEDCL, Prakashgad, Plot No.G-9, Anant Kanekar Marg, Bandra (East), Mumbai - 400051, do solemnly affirm and say as follows:

I am the Executive Director-I (Commercial) of the Maharashtra State Electricity Distribution Company Limited and duly authorised by the said petitioner to make this affidavit.

The statements made in the enclosed Review Petition in the order dated 3rd November 2016 in case no. 48 of 2016 in the matter of Petition of Maharashtra State Electricity Distribution Company Limited for Truing up for 2014-15, Provisional Truing up for FY 2015-16 and Multi Year Tariff for 3rd control period FY 2016-17 to FY 2019-20 are made considering the information received from the concerned officers of the Company; which is shown to me and I believe it to be true.

I say that there are no proceedings pending in any Court of Law/Tribunal or Arbitrator or any Authority, wherein the Petitioner is a party and issues arising and or/reliefs sought are identical or similar to the issues arising in the matter except issue of O & M expenses in Miscellaneous Application (Case No. 123 of 2016) and issue of RPO (Case no. 44 of 2016) submitted by MSEDCL before this Hon'ble Commission.

I solemnly affirm at Mumbai on this 16th December, 2016 that, the contents of this affidavit are true to the best of my knowledge, no part of it is false and nothing material has been concealed there from.



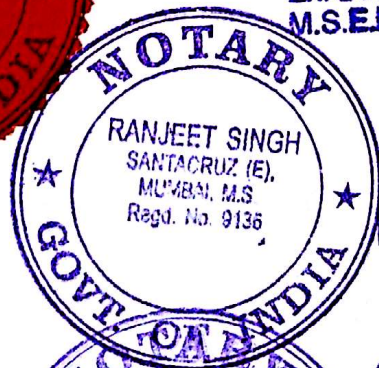
Satish Chavan
Ex. Dir. (Dist. - I) Commercial
M.S.E.D.C.L. Prakashgad,

Deponent

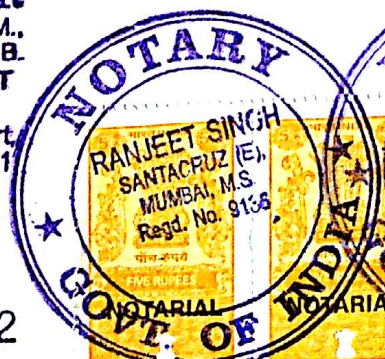
BEFORE ME

Ranjit Singh

RANJEET SINGH
M.Sc.LL.B



Binod Kumar
IDENTIFIED BEFORE ME
BINOD KUMAR
B.Sc. Math (H), P.G.D. EM.,
M.A., L.L.B.
ADVOCATE HIGH COURT
Lawyers Chamber,
Bhaskar Building, Bandra Court,
Bandra (East), Mumbai-400 051



NOTARY
MAHARASHTRA
GOVT OF INDIA
16 DEC 2016

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BEFORE MAHARASHTRA ELECTRICITY REGULATORY COMMISSION, MUMBAI

Filing No.: _____

Case No.: _____

IN THE MATTER OF

ORDER DATED 3RD NOVEMBER 2016 IN CASE NO. 48 OF 2016 IN THE MATTER OF PETITION OF MAHARASHTRA STATE ELECTRICITY DISTRIBUTION CO. LTD. FOR TRUING-UP FOR FY 2014-15, PROVISIONAL TRUING-UP FOR FY 2015-16 AND MULTI-YEAR TARIFF FOR 3RD CONTROL PERIOD FY 2016-17 TO FY 2019-20

AND

IN THE MATTER OF

SECTION 94 (1) (f) OF THE ELECTRICITY ACT, 2003;

AND

IN THE MATTER OF

REGULATION 85 (REVIEW OF DECISIONS, DIRECTIONS & ORDERS) OF MERC (CONDUCT OF BUSINESS) REGULATIONS, 2004;

AND

IN THE MATTER OF

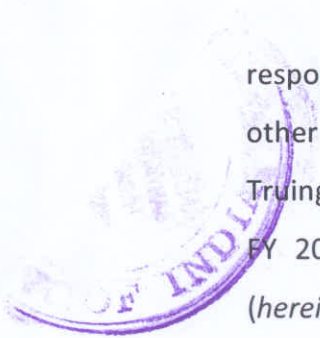
MAHARASHTRA STATE ELECTRICITY DISTRIBUTION COMPANY LIMITED, PRAKASHGAD, BANDRA (EAST), MUMBAI - PETITIONER

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Submission on behalf of Maharashtra State Electricity Distribution Company Limited.

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. The Petitioner 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. The Petitioner 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. The Petitioner had submitted a petition in accordance with the MERC (Multi Year Tariff) Regulations 2015 as amended for Truing-up for FY 2014-15, Provisional Truing-up for FY 2015-16 and Multi-Year Tariff for 3rd Control Period FY 2016-17 to FY 2019-20 (MERC Case no. 48 of 2016). Hon'ble Commission, in exercise of the powers vested in it under Section 61 and Section 62 of the Electricity Act, 2003 and all other powers enabling it in this behalf, and after taking into consideration submissions made by the Petitioner, suggestions and objections of the public, and



responses of the Petitioner thereto, issues raised during the Public Hearing, and all other relevant material has issued Order for Truing-up for FY 2014-15, Provisional Truing-up for FY 2015-16 and Multi-Year Tariff for 3rd Control Period FY 2016-17 to FY 2019-20 vide its Order dated 3rd November 2016 in Case No. 48 of 2016 (hereinafter to be referred to as "MYT Order").

1.5. However, the Petitioner respectfully submits that in the MYT Order dated 3rd November 2016, there are certain apparent errors and the Petitioner has apprehension over the way certain issues have been dealt with by the Hon'ble Commission and the Petitioner is approaching the Hon'ble Commission with this Petition seeking review of the said MYT Order dated 3rd November, 2016.

1.6. The Petitioner is submitting this Petition seeking review of said MYT Order dated 3rd November 2016 in Case No. 48 of 2016 for kind consideration of the Hon'ble Commission under the following provisions:

a) Electricity Act 2003

Section 94 (1) (f) of the Electricity Act 2003 allows the Appropriate Commission to review its own decisions, directions and orders. The relevant clause is reproduced below for reference:

"94. Powers of Appropriate Commission

(1) The Appropriate Commission shall, for the purposes of any inquiry or proceedings under this Act, have the same powers as are vested in a civil court under the Code of Civil Procedure, 1908 (5 of 1908) in respect of the following matters, namely:--

.....

(f) reviewing its decisions, directions and orders;

....."

b) MERC Regulation

Regulation 85 (Review of Decisions, Directions & Orders) of MERC (Conduct of Business) Regulations, 2004, which is reproduced here below:

“85 (a) – Any person aggrieved by a direction, decision or order of the Commission, from which (i) no appeal has been preferred or (ii) from which no appeal has been allowed, may, upon discovery of new & important matter or evidence which, after the exercise of due diligence, was not within his knowledge or could not be produced by him at the time when direction, decision or order was passed or on account of some mistake or error apparent from the face of the record, or for any other sufficient reasons, may apply for a Review of such order, within forty-five (45) days of the date of the direction, decision or order, as the case may be, to the Commission.”

- 1.7. Based on the above Section of the Electricity Act, 2003 and the relevant Regulations issued by the Hon'ble Commission, the Petitioner requests the Hon'ble Commission to admit the Petition without prejudice to its rights to seek redressal under the Appellate remedy provided in Section 111 of the Electricity Act, 2003 or by initiating any other proceedings as may be advised.
- 1.8. The Petitioner humbly submits that the Petition is submitted for consideration and rectification of the apparent errors and review of the certain critical rulings of the Hon'ble Commission so that the resultant Revenue Gap after Truing-up for FY 2014-15, Provisional Truing-up for FY 2015-16 and Multi-Year Tariff for 3rd Control Period FY 2016-17 to FY 2019-20 is appropriately re-stated for the Petitioner to sufficiently discharge its duties as mandated in Electricity Act, 2003.
- 1.9. The Petitioner submits that the Petition is being filed within the prescribed time limit;
- 1.10. The Petitioner therefore requests the Hon'ble Commission to admit the Petition and permit review of the said MYT Order dated 3rd November 2016 (Case No. 48 of 2016) on the following grounds:

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2. GROUNDS SEEKING REVIEW OF THE MYT ORDER FOR THE PERIOD F. Y. 2014-15 TO F. Y. 2019-20

I. **GFA amount considered for Wires Business for Normative Calculation of O&M Expenses for FY 15-16**

The Petitioner respectfully submits that while approving the O&M expenses for FY 15-16 for wires business, Hon'ble Commission has considered the Opening GFA as Rs. 32073 Crs instead of Rs. 35678 Crs (90% of GFA net off GFA pertaining to DFs). This is an error apparent on the face of record and needs correction. The Opening GFA considered by Hon'ble Commission is shown in following table.

Table 1 : Opening GFA considered by Hon'ble Commission for O&M Expenses FY 15-16

Particulars	Units	Approved by MERC
Parameters for O&M Expenses		
Opening GFA for Wires	Rs. Crore	32,073
Opening GFA for Supply	Rs. Crore	3,964
Total	Rs. Crore	36,037

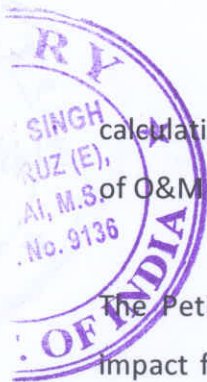
The Petitioner humbly submits that Hon'ble Commission has approved an Opening GFA of Rs. 40,510 crore for FY 2015-16. Further, considering the methodology adopted by Hon'ble Commission, the GFA pertaining to DFs of Rs. 868 Crs is to be deducted from the Opening GFA. Thus, the Opening GFA for MSEDCL works out to be Rs. 39,642 Crs. Accordingly with a 90:10 ratio, the Opening GFA for Wires and Supply should have been as given below:

Table 2: Corrected Opening GFA for FY 15-16

Particulars	Units	Approved by MERC
Parameters for O&M Expenses		
Opening GFA for Wires	Rs. Crore	35,678
Opening GFA for Supply	Rs. Crore	3,964
Total	Rs. Crore	39,642

It is pertinent to note that Hon'ble Commission has correctly considered the Opening GFA for supply business as Rs. 3,964 Crs as worked out by the Petitioner, however, it has not considered Rs. 35678 Crs for wires business. The Petitioner most humbly requests the Hon'ble Commission to review the apparent error in the bifurcation of Opening GFA in wires and supply business used for

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calculation of the O&M expenses for FY 2015-16. Accordingly, the computation of O&M expenses as per norms for FY 2015-16 would need correction.

The Petitioner most respectfully submits that it has calculated the combined impact for O&M Expenses at Sr. No. III of the Grounds for Review in following paragraphs. Therefore, the Petitioner has not separately computed the impact of GFA error for FY 15-16 on O&M Expenses here.

II. No. of consumers considered for Normative Calculation of O&M Expenses for FY 14-15 – DF Consumers reduced twice

The Petitioner submits that considering no. of consumers as 20,920 (in '000) instead of 21,853 (in '000) is an error apparent on the face of the records and needs to be corrected. The apparent error is that the Petitioner had given number of consumers excluding that of all the Distribution Franchisee (DF). Hon'ble Commission has considered it as including that of Distribution Franchisee thereby reducing the number of consumers of Distribution Franchisee twice.

All along the Petitioner had submitted the 21,853 (in '000) as number of consumers without DF Consumers. Hon'ble Commission has considered this number as with DF and reduced it thereby resulting in reduction of consumers of DF twice. (Refer reply to Query 6 at **Annexure 1**). This has resulted in reduction of O&M Expenses to that extent.

The Petitioner further submits that as considered by the Hon'ble Commission 29000 number of Ag consumers (Refer table of MYT Order) is required to be reduced from 2,18,53,000 (excl DF). Thus the number of consumers to be considered for calculation of O&M Expenses is 2,18,24,000.

The Petitioner most respectfully submits that it has calculated the combined impact for O&M Expenses at Sr. No. III of the Grounds for Review in following paragraphs.

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III. Non Consideration of GFA Reconciliation submitted by MSEDCL

The Petitioner most respectfully submits that Hon'ble Commission in MYT Order Case No. 121 of 2014 has directed the Petitioner to submit the reconciliation of the GFA so as to enable the Hon'ble Commission to scrutinise, verify and ascertain such claims before they can be allowed.

Accordingly, reconciled statement of difference amounting to Rs. 1336 Cores in Opening balance of FY 2013-14 was submitted but the same has inadvertently not been considered by Hon'ble Commission.

It is submitted that in a similar case for the FY 2007-08, after due diligence with respect to Cost Benefit Analysis, the Hon'ble Commission reviewed its decision and allowed all CAPEX related expenses.

In spite of allowing this CAPEX related expenses, the same are not considered in the opening GFA for subsequent years. This amount is Rs. 815 Crs. Similarly an amount of Rs. 208 Crs and Rs. 112 Crs of capitalisaion needs to be considered in GFA which inadvertently has not been considered. It is submitted that Hon'ble Commission has allowed expenditure of Rs. 190 Crs as a part of GFA (Table 3-30 Page Nos. 127 in the order MYT dated 3.11.2016). Thus, on similar lines an expenditure of Rs. 208 Crs and Rs. 112 Crs may be reviewed. The details are shown in the following table.

Table 3: GFA for 15-16 considered by Hon'ble Commission

Particulars	Formula	Amount Rs. Crs	Reference
Closing GFA as per MERC Order as on FY 2014-15	A	36,505	Table 3-32 Page 128 of 617 of MYT Order
Add: Capitalisation allowed	B	3,826	Table 3-30 Page 127 of 617 of MYT Order
Add: Capitalisation allowed towards schemes not forming part of any specific scheme	C	190	Table 3-30 Page 127 of 617 of MYT Order
Capitalisation considered for Funding Plan	D=B+C	4,016	Table 3-30 Page 127 of 617 of MYT Order



Particulars	Formula	Amount Rs. Crs	Reference
Less: GFA reduced to the extent of Intangible Assets written off	E	10	
Opening GFA for FY 15-16	F=A+D-E	40,510	Table 4-29; Page 187 of 617 of MYT Order

Accordingly, in line with the above, the Petitioner humbly submits that the Opening GFA for FY 2014-15 needs to be revised considering the impact of previously disallowed additions as shown in the following table:

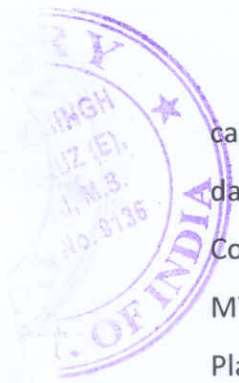
Table 4: Revised Opening GFA for FY 2014-15

Particulars	Rs. Crore	Ref. Tariff Order
Opening GFA for FY 2014-15 as per MERC	36,505	
Difference in GFA approved in FY 2007-08 – DPR/ Non DPR Schemes	815	17 th August 2009 – Case No. 116 of 2008
GFA Disallowed in FY 2009-10, Capitalisation undertaken by Corporate Office and not falling under the Scheme	208	30 th December 2011 Case No 100 of 2011
GFA Disallowed in FY 2011-12, Capitalisation by Corporate	112	11 th June 2014- Case No. 38 of 2014
Opening GFA for FY 2014-15 revised	37,639	

The Petitioner most humbly requests the Hon'ble Commission to consider the above inclusions in the Opening GFA and revise the Opening GFA for FY 2014-15. The correction in GFA will impact the a) O&M Expenses b) Interest on Long Term Loans c) Depreciation d) Return on Equity e) Interest on Working Capital and f) Contribution to Contingency Reserves.

The Petitioner further submits that the Hon'ble Commission under the scheme "Infra Plan Works-II", has approved only Rs. 483 crore capitalisation as against Rs. 2,440 crore proposed by it. However, Hon'ble Commission has not provided any reference for consideration of Rs. 483 crore capitalisation under the scheme "Infra Plan Works-II". The Petitioner most respectfully submits that it has submitted the capitalization amount based on the available information at the time of submission of MYT Petition which is available to the Hon'ble Commission. Further, as a part of MYT Petition proceedings, it has neither submitted revised

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capitalization under the scheme "Infra Plan Works-II" in any of the replies to datagaps, nor as a part of additional submission pertaining to the MYT Petition. Considering the submissions made by the Petitioner as a part of proceedings of MYT Petition in Case No. 48 of 2016, the capitalization under the scheme "Infra Plan Works-II" for FY 15-16 should have been Rs. 2,440 crore. To substantiate the claim of provisional submission, the Petitioner is submitting the Circle wise Capex and Capitalization along with the progress of the works executed under Infra II Scheme (No. of Sub-Stations/DTCs/HT/LT Lines) for FY 15-16 annexed as **Annexure 2**.

Therefore, the Petitioner requests the Hon'ble Commission to consider the capitalization under the scheme "Infra Plan Works-II" as submitted by the Petitioner. The Petitioner further requests the Hon'ble Commission to accordingly revise GFA for FY 2015-16 and onwards in view of the submissions in foregoing paragraphs. The GFA account and corresponding revision in depreciation for FY 2014-15 to FY 2015-16 would be as below:

Table 5: Revised GFA and Depreciation for FY 14-15 and FY 15-16

Rs. Crs

Particulars	FY 14-15	FY 15-16
Op. Bal	36,504	41,645
Add: Difference in GFA Approved 2008-09	815	
Add: GFA Disallowed in FY 2009-10	208	
Add: GFA Disallowed in FY 2011-12	112	
Revised Opening Balance	37,639	41,645
Additions during the year	4016	4672
Retirements during the year	10	
Closing GFA	41,645	46317
Depreciation considered by Commission	1,620	1,857
Depreciation required to be considered as per MSEDCL	1,671	1,952
Weighted Average Rate of Depreciation	4.44%	4.69%
Additional Impact	51	95

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The Petitioner humbly submits that Hon'ble Commission in Table 5.54 of the MYT Order has considered the Opening GFA by adjusting grants and consumer contribution and allowed the Depreciation for 3rd Control Period.

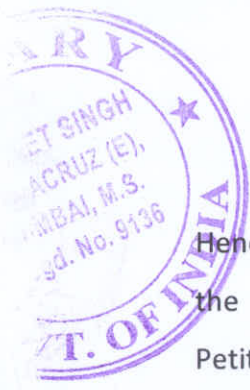
The Petitioner further submits that during FY 14-15, there was a change in the accounting policy for Government Grants, Subsidies and Consumer Contribution as mentioned in the para 3 (c) of Note 2 "Significant Accounting Policies" and Note 30.10.

The Petitioner also submits that as per audited accounts, the GFA balance is without considering the amount of Government Grants, subsidies and Consumer contribution. In line with the accounting policy as mentioned in para 3 (c) of Note 2 "Significant Accounting Policies" and Note 30.10 of the Accounts, 1/15th of the amount of Government Grants, subsidies and consumer contribution is accounted as non-tariff income and deferred amount is shown in capital reserve. Hence, the Hon'ble Commission wrongly deducted the Government Grants, subsidies and Consumer contribution from the GFA for the purpose of computation of depreciation which is an error apparent on the face of records and needs correction.

On account of the change in Accounting Policy, the Government Grants, Subsidies and Consumer Contributions are credited to the Capital Reserve account and are subsequently credited to the Statement of Profit and Loss equally over the period of fifteen years from the year of its receipt.

In the MYT Petition, the amount of capital grants deferred to the profit and loss account is included in the non-tariff income. The fixed assets shown in the Gross Fixed Assets (Note 12) is the total cost of the fixed assets. The impact of the capital grants, subsidies and consumer contribution have not been included in the Gross Fixed Assets (i.e. the GFA is not reduced to that extent). The depreciation calculated each year during the control period have been calculated on the amount of gross fixed assets.

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Hence, the Petitioner submits that Hon'ble Commission could have calculated the amount of depreciation on the Gross Fixed Assets as submitted by the Petitioner without adjusting the amount towards capital grant, subsidies and consumer contributions. The 1/15th share of the capital grant, subsidies and consumer contribution have been already considered in the 'Other Income' and approved under 'Non-Tariff Income' in the MYT Order. The Hon'ble Commission has computed depreciation on Net Fixed Assets (after deducting capital grant, subsidies and consumer contribution) and at the same time approved non-tariff income which is inclusive of deferred income on grants. Therefore, the Petitioner submits that calculating depreciation on the Opening GFA after adjusting grants, subsidies and consumer contribution have reduced the claim for depreciation by an amount equal to depreciation on the amount of capital grants, subsidies and consumer contributions. This is an apparent error which needs correction.

Hence, the Petitioner most humbly submits that the amount of Opening GFA for the purpose of calculating depreciation for the 3rd Control Period may be considered as submitted by the Petitioner without deducting the Grants, Subsidies and Consumer Contribution and accordingly the depreciation may be revised to that extent.

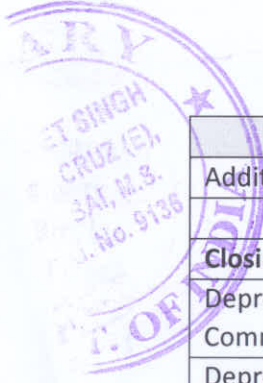
As per the methodology adopted by Hon'ble Commission, the Petitioner has calculated the impact of depreciation considering the approved rate of depreciation for FY 14-15 i.e. 4.44% on opening balance and 2.22% (4.44% *1/2) on additions during the year. Considering revision in GFA and additions including Grants& Contribution, the Petitioner has calculated the Depreciation for 3rd Control Period as shown in the following table.

Table 6: Revised Depreciation for 3rd Control Period

Rs. Crs

Particulars	FY 16-17	FY 17-18	FY 18-19	FY 19-20
Revised Opening Balance of GFA	46,317	54,774	60,552	62,626

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Particulars	FY 16-17	FY 17-18	FY 18-19	FY 19-20
Additions during the year	8,457	5,778	2,074	449
Closing GFA	54,774	60,552	62,626	63,075
Depreciation considered by Commission	2,063	2,308	2,449	2,498
Depreciation required to be considered as per MSEDCL	2,244	2,560	2,734	2,790
Weighted Average Rate of Depreciation	4.84%	4.67%	4.52%	4.46%
Additional Impact	181	252	285	292

The Petitioner requests the Hon'ble Commission to allow depreciation considered in the Table above.

Further, the Petitioner submits that in its Format for RoE, it has submitted the following Consumer Contribution and Grants for FY 14-15 and FY 15-16. The Regulatory Format Form 8 is attached herewith as **Annexure 3**.

Table 7: Consumer Contribution and Grants submitted by MSEDCL

Rs. Crs

Particulars	FY 14-15	FY 15-16
Consumer Contribution	352	110
Grants	316	1392

The Hon'ble Commission has considered following values for funding of capitalization. However, Hon'ble Commission has not provided any rationale or source for considering the same.

Table 8: Consumer Contribution and Grants considered by Hon'ble Commission

Rs. Crs

Particulars	FY 14-15	FY 15-16
Consumer Contribution	430	49
Grants	387	405

Considering the submissions made by the Petitioner in its MYT Petition, it has recomputed the following funding of capitalization:

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Table 9: Revised funding of capitalization

Particulars	FY 14-15	FY 15-16	FY 16-17	FY 17-18	FY 18-19	FY 19-20
Total Capitalization	3,826	4,672	8,457	5,778	2,074	449
Consumer Contribution	352	110	93	32	15	3
Grants	316	1392	1877	1162	289	36
Balance to be funded	3,158	3,170	6,487	4,584	1,770	410
Equity	947 (30%)	412 (13%)	778 (12%)	321 (7%)	35 (2%)	-
Debt	2,211 (70%)	2,758 (87%)	5,709 (88%)	4,263 (93%)	1,735 (98%)	410 (100%)

The funding ratio have been assumed at the same percentage as approved by the Hon'ble Commission in the impugned MYT Order. Accordingly, The Petitioner has calculated the impact of Interest on Loans, Return on Equity and O&M Expenses.

Table 10: Revised Interest on Loan Rs. Crs

Particulars	FY 14-15	FY 15-16	FY 16-17	FY 17-18	FY 18-19	FY 19-20
Opening Balance of Loan approved by MERC	13,930	15,040	15,846	19,311	21,014	20,015
Additions not approved earlier (70% of Rs. 815 crores of GFA for scheme approved FY 2008-09)	571					
Additions during the year	2,211	2,758	5,709	4,263	1,735	410
Repayment of Loan*	1,671	1,952	2,244	2,560	2,734	2,790
Closing Balance of Loan	15,040	15,846	19,311	21,014	20,015	17,635
Interest Rate on Loan	11.83%	11.83%	11.83%	11.83%	11.83%	11.83%
Interest Charges approved by MERC	1,677	1712	1937	2269	2341	2176
Revised Interest Charges computed by MSEDCL	1,714	1,827	2,079	2,385	2,427	2,227
Financial Impact	37	115	142	116	86	51

*Repayment calculated on the basis of revised depreciation calculated in Table 6.

Considering the revised funding of capitalization at Table 9, the Petitioner has considered the equity in the ratio of 90:10 (Wires: Supply Business) and calculated the revised Return on Equity as shown in the following tables.

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Table 11: Revised Return on Equity (Wires) Rs. Crs

Particulars	FY 14-15	FY 15-16	FY 16-17	FY 17-18	FY 18-19	FY 19-20
Outstanding Equity approved by MERC	7780	8853	9224	9924	10213	10245
Additions not approved earlier (90% of 30% of Rs. 815 crores of GFA for scheme approved FY 2008-09)	220					
Additions during the year	853	371	701	289	32	0
Closing Balance of Equity	8853	9224	9924	10213	10245	10245
Return on Equity Computation						
RoE on the opening equity @ 15.5%	1240	1372	1430	1538	1583	1588
RoE on additions @ 15.5%/2	66	29	54	22	2	0
Revised RoE Computed by MSEDCL	1306	1401	1484	1561	1585	1588
RoE approved by MERC	1269	1351	1423	1499	1525	1527
Financial Impact	37	50	61	62	60	61

Table 12: Revised Return on Equity (Supply Business) Rs. Crs

Particulars	FY 14-15	FY 15-16	FY 16-17	FY 17-18	FY 18-19	FY 19-20
Outstanding Equity approved by MERC	864	983	1024	1102	1134	1138
Additions not approved earlier (10% of 30% of Rs. 815 crores of GFA for scheme approved FY 2008-09)	24					
Additions during the year	95	41	78	32	4	0
Closing Balance of Equity	983	1024	1102	1134	1138	1138
Return on Equity Computation						
RoE on the opening equity	155	172	179	193	199	199
RoE on additions	8	4	7	3	0	0
Revised RoE Computed by MSEDCL	164	176	186	196	199	199
RoE approved by MERC	159	169	179	188	191	192
Financial Impact	5	7	7	8	8	7

In line with the above tables exhibiting the impact of the Revised GFA and the funding of capitalization amount, the Petitioner most earnestly requests the Hon'ble Commission to consider the above submissions and consider Opening GFA as revised by the Petitioner. It is further requested to approve the difference in capex related expenses for the revised GFA for FY 2014-15, funding for capitalization as per the Petitioner for FY 2014-15 and FY 2015-16 and for the subsequent years as submitted above.

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Considering the revised GFA for FY 14-15 & FY 15-16 and no. of consumers for FY 14-15 as submitted by MSEDCL, the O&M Expenses have been worked out in **Annexure 4 and Annexure 5**. The total impact of the GFA and no. of consumers for FY 14-15 and FY 15-16 works out to be Rs. 334 Crs

The Petitioner most earnestly requests the Hon'ble Commission to consider the revised GFA for FY 14-15 & FY 15-16 and no. of consumers for FY 14-15 as submitted by the Petitioner and allow the recomputed O&M Expenses.

IV. Contribution to Contingency Reserve

The Petitioner submits that Regulation 34.1 of the MYT Regulations, 2015 provides for contribution to Contingency Reserve. The Hon'ble Commission in MYT Order at Table 5-76; has approved the contribution to Contingency Reserve at 0.25% of the opening GFA approved in the MYT Order, for the respective years of the 3rd Control Period.

However, considering the revision in GFA as submitted by the Petitioner in **Table 5** and **Table 6** above, the contribution to Contingency Reserve also needs revision. Accordingly, the Petitioner has computed the revised contribution to Contingency Reserve in **Annexure 6** and the net impact worked out to be Rs. 32 Crs.

The Petitioner most humbly requests the Hon'ble Commission to consider the above submission and allow the additional impact in contribution to Contingency Reserve.

V. A&G Expenses (Miscellaneous Expenses of Rs.109 Crs)

The Petitioner submits that in its MYT Petition in Case No. 48 of 2016, under A&G Expenses, it has claimed refund of penalty of Rs.109 Crores to Adani Power Maharashtra Ltd as per MERC order dated 30.03.2015 (Case No. 144 of 2014). The Petitioner submits that it has provided the following reasoning for the same.

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Hon'ble Commission has considered the "Impact of Shortfall of Chinese Manpower on Project Execution due to GoI'S change in Visa Policy as a Force Majeure event and accordingly allowed delay in the scheduled COD and disallowed the excess penalty levied by MSEDCL. Further it has directed the Company to refund the excess amount of penalty deducted.

However, Hon'ble Commission in the MYT Order has approved the O&M Expenses based on norms and did not consider the submission of the Petitioner in its MYT Petition. It is pertinent to note that Hon'ble Commission in the True Up of FY 13-14 has considered the above penalty collected by the Petitioner under Non-Tariff Income. The details of Non-Tariff income as per the Note 22 of the Audited Accounts of FY 13-14 are given in **Annexure 7**:

Even though, the Petitioner had claimed and collected Rs. 126 Crs against the Liquidated Damages from M/s Adani Power Maharashtra Ltd., as per the MERC Order dated 30.03.2015, the Liquidated Damages worked out to be Rs. 17 Crs. Accordingly, MSEDCL refunded the said amount of Rs. 109 Crs in FY 14-15 which were a part of A&G Expenses for FY 14-15.

The Petitioner submits that this is a new and important matter or evidence which could not be produced by the Petitioner during the proceedings of the MYT Petition in Case No. 48 of 2016. MSEDCL had not anticipated this disallowance; hence the same was not submitted then.

Therefore, the Petitioner most humbly requests the Hon'ble Commission to allow the expense of Rs. 109 Crs separately over and above the normative of O&M expenses.

VI. Intangible Assets Written Off during FY 14-15

The Petitioner submits that Hon'ble Commission has disallowed an amount of Rs. 10 crore in Other Expenses pertaining to write off of Intangible assets citing no such amount was seen in the GFA Table. However, while doing so Hon'ble

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Commission has considered the written off assets in the GFA calculation and reduced the GFA to that extent. The working for Closing GFA considered by Hon'ble Commission for FY 2014-15 works out to be as given below:

Table 13: Closing GFA for FY 14-15

Particulars	Rs. in Crores
Opening GFA as on FY 2014-15	36,505
Capitalisation allowed in FY 2014-15	4,016
Less: Intangible assets written off	(10)
Closing GFA as on FY 2014-15	40,510

The Petitioner submits that Hon'ble Commission has disallowed the expenses of Rs. 10 crores towards write off of intangible assets and at the same time Hon'ble Commission has also reduced the write off of Rs. 10 crores (as shown in the above table) from the GFA amount, thus understating the GFA for FY 2014-15 by Rs. 10 crores. This is an error apparent on the face of record and needs correction. Hence, the Petitioner most humbly requests the Hon'ble Commission to correct the apparent error and allow the expenses of Rs. 10 crores towards intangible assets written off.

VII. Treatment given to Depreciation in Prior Period Expenses

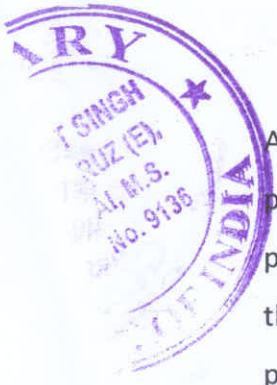
The Petitioner humbly submits that the approval of the prior period expenses to the extent of excess provision for depreciation of Rs. 1006.76 crore is not line with the treatment given for prior period claims in the previous Orders and also not as per the provisions of the Regulations pertaining to Depreciation. Therefore, the Petitioner submits that this is an error apparent on the face of record and needs correction.

The Petitioner had submitted the following information in Table 3-73 relating to the Net prior period expenses for FY 2014-15 as per Annual accounts:

Table 14: Excess/Under Provision for Depreciation for FY 2014-15 (Rs Crs)

Particulars	As per Accounts (31 March, 2015)	Approved by Commission
Excess Provision for Depreciation	1,006.76	1006.76
Depreciation under provided	494.21	-

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As per the above table, the Hon'ble Commission has approved the excess provision for depreciation of Rs. 1,006.76 crore and has not considered the under provision for depreciation of Rs. 494.21 crore. The Petitioner respectfully submits that the Hon'ble Commission in all previous orders has not approved the prior period claims of operating expenses, depreciation, interest and finance charges, material related expenses etc. since these have been approved in the respective years as per the applicable norms/regulations and upon detailed scrutiny. The relevant extracts of the respective Orders (only 3 for reference) is reproduced below:

MERC Case No. 121 of 2015

The capitalisation and corresponding depreciation is approved by the Commission for every year based on prudence check and the provisions of the Regulations. Accordingly, the Commission has not considered the claim of MSEDCL for any excess or short provision of depreciation and interest for the past period.

MERC Case No. 38 of 2014

FY 11-12

The Commission has not been able to consider the claim of MSEDCL for any excess/ short provision of depreciation and excess/ short provision for interest. Adjustments for depreciation and capitalisation cannot be allowed in regulatory accounting as the Commission approves capitalisation and corresponding depreciation for every year based on prudence check and provisions of Regulations.

FY 12-13

However the Commission cannot consider the claim of MSEDCL towards operating expenses, employee costs, depreciation, interest and finance charges and administrative expenses as they are controllable factors, and approved to MSEDCL as per the principles set out in all the previous Tariff Orders.

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It is pertinent to note the amount of depreciation shown in the prior period expenses/ (income) pertains to previous years i.e. upto FY 13-14. It is also important to note that the Hon'ble Commission has approved the depreciation till FY 13-14 based on regulatory norms and the provisions of the applicable tariff regulations.

Accordingly, the Petitioner most humbly requests the Hon'ble Commission not to consider the Excess Provision for Depreciation allowed in truing up of FY 14-15 and increase the ARR for FY 14-15 to that extent.

VIII. Sharing of gains/losses for FY 15-16

The Petitioner submits that at Table 4-61, the Hon'ble Commission has calculated the efficiency loss due to restatement of Distribution Loss in FY 2015-16. Further, at Table 4-8, Hon'ble Commission has approved the Energy Balance for FY 2015-16. In the said table, the Energy at Distribution Periphery is shown as 1,16,148 MUs whereas while computing Efficiency Loss due to restatement of Distribution Loss in FY 2015-16, the Actual energy input at the distribution periphery was considered as 1,16,184 resulting in overstatement of sales by 36 MUs. This is an error apparent on the face of record and needs correction.

Considering the Energy at Distribution Periphery as approved in the Energy Balance at Table 4-8, the Petitioner has calculated the Efficiency Loss due to restatement of Distribution Loss in FY 2015-16 as shown in **Annexure 8**.

This will result into increase in revenue gap by Rs. 11 Crs for FY 15-16. The Petitioner most respectfully submits that it has calculated the above financial impact only for representation purpose. Considering the other issue in energy balance, the Petitioner has calculated the revised Energy Balance and corresponding change in the Distribution Loss for FY 2015-16 in the following ground of review.

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IX. Energy Balance for FY 15-16

The Petitioner submits that at Table 4-8, Hon'ble Commission has approved the Energy Balance for FY 2015-16. In the said Table Hon'ble Commission has considered Energy at Distribution Periphery as 116,148 MUs instead of 1,15,059 MUs as submitted by the Petitioner.


The Petitioner submits that energy at Distribution Periphery is based on metered energy at sub-station end which has been verified with the final data received from MSLDC. The Petitioner submitted the energy at Distribution Periphery based on the provisional data available at the time of the submission of the MYT Petition. Considering the intra-state transmission losses at 3.92%, the Petitioner has derived Inter-State losses as power purchase, sales and energy at Distribution Periphery are metered figures. However, instead of revising the Inter-State losses being a derived number based on the approved sales for FY 15-16, Hon'ble Commission revised the metered figure of Energy at Distribution Periphery. This is an error apparent on the face of record and needs correction.

The Petitioner further submits that the TAPS (NPCIL) and EMCO Power Plants are connected to CTU and therefore are considered as Inter-State sources. Considering the energy at Distribution Periphery and total energy handled as submitted in the Petition, the Petitioner has computed the energy balance for FY 15-16 as shown in the following table.

Table 15: Revised Energy balance for FY 15-16

Particulars	Unit	Revised	Reference
Retail Energy Sale to Consumers	MU	94,965	Metered (except AG unmetered)
Distribution Losses	%	17.46%	Derived
Distribution Losses	MU	20,094	Derived
Energy at Distribution Periphery	MU	115,059	Metered (Addition of 2 metered figures)
Energy at Distribution Periphery injected and drawn at 33 kV	MU	458	Metered
Energy at Distribution Periphery injected from 33 kV and above	MU	114,601	Metered
Intra-State loss	%	3.92%	Approved by Hon'ble

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Particulars	Unit	Revised	Reference
			Commission
Total Energy required at Transmission Periphery	MU	119,277	
Surplus Energy Traded	MU	877	Metered
Total Power Purchase Quantum Handled	MU	120,154	
Power Purchase Quantum from Intra-State sources	MU	87,048	
Power Purchase Quantum from Inter-State sources at Maharashtra Periphery	MU	33,105	
Inter-State losses	%	6.31%	Derived
Power Purchase Quantum from Inter-State Sources	MU	35,333	
Total Energy Units Handled	MU	122,381	Metered (to the extent of Power Purchase)

Hon'ble Commission in its Tariff Order dated 16th August 2012 has made following observation.

"3.2.6 Time and again, MSEDCL has reiterated that it gets actual energy reading only at three points; (a) at the generation bus bar; (b) at the T<>D interface (distribution periphery); and (c) at the retail sales made to consumers. All others are derived numbers. Therefore, it is not worthwhile to try to examine too much into the reported level of inter-state transmission loss....."

Therefore, instead of revising the metered energy at distribution periphery; Hon'ble Commission could have changed the Inter-State loss since it's a derived number. Therefore, the Petitioner most earnestly requests the Hon'ble Commission to revise the distribution loss for FY 15-16 as 17.46% as submitted above.

The Petitioner further submits that the MYT Regulations 2015 provides for the sharing of gains/losses for FY 15-16 and FY 16-17 at the time of Mid Term Review. The relevant extract of the MYT Regulations 2015 is reproduced below:

"8.4 Upon completion of the Mid-term Review, the Commission shall pass an order recording :—

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- (a) *the approved aggregate gain or loss to the Generating Company or Licensee or MSLDC on account of controllable factors for the Years 2015-16 and 2016-17 and provisional Truing-up for the Year 2017-18, and the amount of such gains or such losses that may be shared in accordance with Regulation 11 ;*
- (b) *the approved aggregate gain or loss to the Generating Company or Licensee or MSLDC on account of uncontrollable factors for the Years 2015-16 and 2016-17, and provisional Truing-up for the Year 2017-18, and the amount of such gains or such losses that were not recovered during the respective years and which may be shared in accordance with Regulation 10 ;.....”(Emphasis Added)*

Therefore, the Petitioner submits that the Efficiency Loss due to restatement of Distribution Loss should be done only at the time of Mid Term Review and not during MYT Tariff determination.

The Petitioner is passing through precarious financial situation and its Balance sheet is already stressed. Further, due to such advance sharing of losses, the Petitioner will be further adversely affected and its ability to invest for loss reduction will further strain.

Hence, the Petitioner most respectfully prays to the Hon'ble Commission to consider the Efficiency Loss due to restatement of Distribution Loss at the time of upcoming Mid Term Process based on the actual performance of the Petitioner and not to share the burden of losses.

X. Energy Balance for MYT Control Period

The Petitioner submits that at Table 5-19 Hon'ble Commission has calculated the Energy Balance for 3rd Control Period. For the representation purpose, the Petitioner has shown only the part of the Energy Balance Table.

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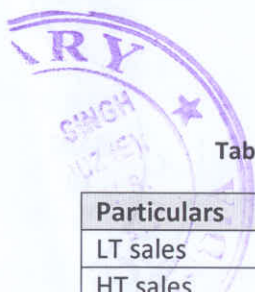


Table 16: Part of Energy Balance for 3rd Control Period considered by Hon'ble Commission

Particulars	Units	FY 16-17	FY 17-18	FY 18-19	FY 19-20
LT sales	MU	60,624	64,294	68,314	72,713
HT sales	MU	24,524	25,575	26,674	27,823
HT and Renewable Open Access Credit	MU	420	420	420	420
Sales to Open Access Consumers (Conventional)	MU	6,165	6,412	6,668	6,935
Total Sales to Consumers	MU	91,733	96,701	102,076	107,890
Distribution Loss	%	17.76%	16.26%	14.76%	13.26%
Distribution Loss	MU	18,872	17,941	16,946	15,876
Total Energy Available for Sale at 33kV	MU	110,606	114,642	119,023	123,766

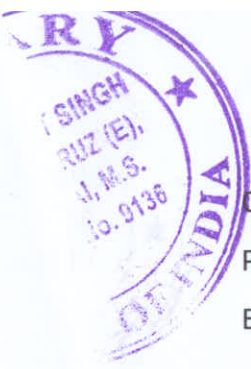
The Petitioner submits that from the above table, considering the Total Energy Available for Sale at 33kV and Total Sales to Consumers for FY 16-17, the Distribution Loss works out to be 17.06% and not 17.76% as shown by Hon'ble Commission. i.e. $(1,10,606-91,733)/(1,10,606)*100$. Similar discrepancies can be seen in future period as well. Thus, this is an error apparent on the face of record and needs correction.

However, considering the actual trend of HT I Industrial sales for 6 months of FY 16-17 and comparing it with that of approved sales, the Petitioner most humbly requests the Hon'ble Commission to revise the sales for HT I Industrial Category for 3rd Control Period. A copy of month wise sales for FY 16-17 (upto Sep-16) of HT I Industrial Category is attached herewith as **Annexure 9**. Therefore, considering the approved distribution loss trajectory, the Hon'ble Commission may reduce the sales of HT I Industrial Category to the extent of error in Distribution Loss. Considering this, the Petitioner has reduced the HT I Industries Sales as shown in following table.

Table 17: Reduction in HT I Industrial Sales (MUs)

Financial Year	EHV	33 kVA	11/22/25 KVA	Total
FY 16-17	146	249	403	798
FY 17-18	132	225	365	723
FY 18-19	117	200	323	640
FY 19-20	101	172	278	551

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Considering the reduction in sales of HT I Industrial Category during FY 16-17, the Petitioner requests Hon'ble Commission to consider the appropriate revision in Energy Balance as shown in **Table 21** in subsequent paragraph.

XI. Approved LT Agriculture sales

Due to non-consideration of equivalent increase in AG connected load compared to approved increase in no. of consumers, the sales for FY 16-17 (i.e. 24,088 MUs) is lower than FY 15-16 (i.e. 24,105 MUs). This is error apparent on the face of record and needs correction.

The Petitioner submits that in the present Petition, it is not contesting the Ag sales approved for FY 14-15 and FY 15-16 without prejudice to its rights. However, the Petitioner reserves its rights to approach this Hon'ble Commission on the issue of approval of Ag sales for FY 14-15 and FY 15-16 as and when it has sufficient data on the matter. Therefore, the Petitioner craves for leave and liberty to approach this Hon'ble Commission subsequently with additional data.

Meanwhile, the Petitioner humbly submits that the Hon'ble Commission at Table 5-11 has approved the No. of Consumers, Connected Load and AG Sales for 3rd Control Period. In the said table, Hon'ble Commission has approved No. of consumers as 41.65 Lakhs and connected load of 200 Lakhs HP for FY 16-17. However, while allowing a growth of around 2 lakhs consumers, the increase in the connected load has been allowed to the extent of 0.38 lakh HP only. A comparison of No. of consumers and connected load for FY 15-16 and FY 16-17 as approved by Hon'ble Commission is shown below:

Table 18: No. of consumers and connected load for FY 15-16 and FY 16-17

Particulars	FY 15-16	FY 16-17	Change
No. of Consumers (lakh)			
Un-Metered	15.91	13.91	-2.000
Metered	23.52	27.75	4.230
Total	39.43	41.65	2.220
Connected Load (lakh HP)			
Un-Metered	83.42	72.93	-10.490

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Particulars	FY 15-16	FY 16-17	Change
Metered	116.20	127.07	10.870
Total	199.62	200.00	0.380

From the above table it is evident that the connected load is not increased corresponding to increase in number of consumers. In case of Un-metered consumer category, the connected load has reduced by ~5 HP per consumer corresponding to the reduction in the number of consumers. However, for the metered category, the increase in the connected load is extremely low at ~ 2.5 HP per consumer corresponding to their increase in number of consumers. Thus, the increase in connected load for metered category is not commensurate with the increase in number of consumers.

The Petitioner submits that the Hon'ble Commission has approved the No. of consumers and connected load for FY 14-15 and FY 15-16 as shown in following the table.

Table 19: Approved No. of consumers and connected load for FY 14-15 and FY 15-16

Particulars	FY 14-15	FY 15-16
	Approved	Approved
No. of Consumers (lakh)		
Un-Metered	15.97	15.91
Metered	21.94	23.52
Total	37.91	39.43
Connected Load (lakh HP)		
Un-Metered	83.63	83.42
Metered	108.92	116.2
Total	192.55	199.62
HP per Consumer		
Un-Metered	5.24	5.24
Metered	4.96	4.94

Considering the approved HP per consumer, the Petitioner has projected the LT Ag Sales for the 3rd Control Period as shown in following table.

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Table 20: Revised LT Ag Sales for the 3rd Control Period

Particulars	HP per Consumer	FY 16-17	FY 17-18	FY 18-19	FY 19-20
No. of Consumers (lakh)					
Un-Metered		13.91	11.91	9.91	7.91
Metered		27.75	32.01	36.55	41.39
Total		41.66	43.92	46.46	49.3
Connected Load (lakh HP)					
Un-Metered	5.24	72.93	62.45	51.96	41.47
Metered	4.94	137.10	158.14	180.57	204.49
Total		210.03	220.59	232.53	245.96
Energy Sales (MUs)					
Un-Metered		9,058	7,756	6,453	5,151
Metered		16,219	18,709	21,362	24,191
Total		25,277	26,464	27,815	29,342
Additional Sales		1,189	1,370	1,566	1,776

The Petitioner most earnestly requests the Hon'ble Commission to consider the connected load in line with the increase in no. of consumers and accordingly revise the LT AG Sales for 3rd Control Period as submitted above.

In view of the above, the Petitioner has calculated the energy balance considering the approved distribution loss trajectory, reduced HT I Industrial sales and corrected LT Ag sales. The Petitioner further submits that the TAPS (NPCIL) and EMCO Power Plants are connected to CTU and therefore are considered as Inter-State sources. The revised energy balance computed by the Petitioner is shown in the following table.

Table 21: Revised Energy Balance for 3rd Control Period considering additional Ag Sales

Particulars	Units	FY	FY	FY	FY
		16-17	17-18	18-19	19-20
		Revised	Revised	Revised	Revised
LT sales	MU	61,813	65,664	69,880	74,489
HT sales	MU	23,872	24,984	26,151	27,373
HT and Renewable Open Access Credit	MU	420	420	420	420
Sales to Open Access Consumers (Conventional)	MU	6,165	6,412	6,668	6,935
Total Sales to Consumers	MU	92,270	97,481	103,119	109,217
Distribution Loss	%	17.76%	16.26%	14.76%	13.26%
Distribution Loss	MU	19,926	18,928	17,856	16,696
Total Energy Available for Sale at 33kV	MU	112,196	116,409	120,975	125,912
Energy injected and drawn at 33kV	MU	458	458	458	458

Particulars	Units	FY	FY	FY	FY
		16-17	17-18	18-19	19-20
		Revised	Revised	Revised	Revised
Net Energy Available for Sale at 33kV	MU	111,738	115,951	120,517	125,454
Sales at 66 kV level	MU	195	203	212	221
Sales at 110 kV/132 kV level	MU	3,018	3,148	3,283	3,424
Sales at 220 kV/44 kV level	MU	2,722	2,859	3,002	3,153
Net Energy requirement at T<>D Periphery	MU	117,673	122,160	127,014	132,253
Intra-State Transmission Loss	%	3.92%	3.92%	3.92%	3.92%
Intra-State Transmission Loss	MU	4,801	4,984	5,182	5,396
Energy Requirement at G<>T Periphery	MU	122,474	127,145	132,197	137,649
Less: Input for OA consumption	MU	6,826	7,099	7,383	7,679
Net Energy Requirement at G<>T Periphery	MU	115,648	120,046	124,814	129,970
Power Purchase Quantum from Intra-State sources	MU	77,542	81,744	87,309	91,211
Power Purchase Quantum from Inter-State sources at Maharashtra Periphery	MU	38,106	38,302	37,505	38,759
Inter-State Losses	%	3.66%	3.66%	3.66%	3.66%
Power Purchase Quantum from Inter-State sources	MU	39,554	39,757	38,930	40,231
Total Power Purchase Quantum payable	MU	117,096	121,501	126,238	131,442
Additional PP		1,715	1,968	2,123	2,341

Accordingly, the Petitioner would require additional quantum of about 8,146 MUs during the third control period. Considering the variable cost where MOD stack ends for the respective year, the Petitioner has calculated the additional power purchase cost as shown in following table.

Table 22: Additional Power Purchase for 3rd Control Period

Particulars	Units	FY 16-17	FY 17-18	FY 18-19	FY 19-20	Total
Additional Power Purchase	MU	1,715	1,968	2,123	2,341	8,146
MOD Ends on	Rs/Unit	2.9	2.81	2.9	2.91	
Impact - Lower approval of PP cost	Rs Cr	497	553	616	681	2,347

The Petitioner further submits that with increased power purchase quantum, the RE power purchase would also require revision considering the RPO requirement. The additional RE Power Purchase quantum and Cost is shown in the following table.

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Table 23: Additional RE Power Purchase quantum for 3rd Control Period

Particulars	Units	FY 16-17	FY 17-18	FY 18-19	FY 19-20	Total
Solar RPO Target	%	1%	2%	2.75%	3.50%	
Non-Solar RPO Target	%	10%	10.50%	11%	11.50%	
Total RPO Target	%	11.00%	12.50%	13.75%	15.00%	
Solar Quantum	MUs	1,171	2,430	3,472	4,600	
Non-Solar Quantum	MUs	11,710	12,758	13,886	15,116	
Total RE purchase Quantum (Revised)	MUs	12,881	15,188	17,358	19,716	
Total RE purchase Quantum (Approved)	MUs	12,692	14,942	17,066	19,366	
Solar Tariff	Rs./Unit	6.54	6.54	6.54	6.54	
Non-Solar Tariff	Rs./Unit	5.56	5.56	5.56	5.56	
Total RE purchase Cost (Revised)	Rs.Crs	7,276	8,682	9,991	11,413	37,363
Total RE purchase Cost(Approved)	Rs.Crs	7,170	8,542	9,823	11,421	36,745
Additional RE purchase Cost	Rs.Crs	108	141	168	202	618

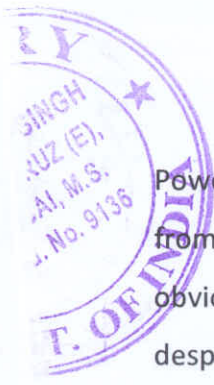
However, this would require reduction of the RE Quantum as well as cost from the Additional Power Purchase computed in the Table31. The Petitioner has calculated the net impact considering the PP rates where MoD ends for non RE power.

Further, the additional LT Ag sale would also fetch additional revenue and reduced HT I Industrial Sale would reduce the revenue. The Petitioner has computed the net impact of additional power purchase, RE Power and revenue from revised Sales as shown in the **Annexure 10**.

Therefore, the Petitioner most respectfully requests the Hon'ble Commission to consider the impact of revised LT AG Sales, HT I Industrial Sales, Revised Energy Balance and consequent revision in power purchase, Revised RE Power required and revenue from LT Ag Sales based on above submissions and allow the resultant financial impact of Rs. 3643 Crs.

XII. Power Purchase from Bhusawal 3 and Nashik 3,4,5

Hon'ble Commission in Table 5-35 to Table 5-38 has approved the Power Purchase from Thermal Stations/Units for the 3rd Control Period. In the approved



Power Purchase; Hon'ble Commission has not approved any power purchase from Bhusawal 3 and Nashik 3,4,5. However, it has been observed that due to obvious reasons (Transmission Constraints) these Stations are being scheduled despite higher Energy Charges in the MOD Stack. In fact, in the MYT Order dated 30th August, 2016 of MSPGCL in Case No. 46 of 2016 has observed following.

The Commission is aware of the fact that, due to unavoidable technical reasons, some of the costlier Generating Stations of MSPGCL, like Nashik, are being despatched despite higher Energy Charges in the MOD Stack.

Further, in the MSEDCL MYT Order dated 3rd November 2016, Hon'ble Commission has also observed that the Generators would be despatched as per MOD principles subject to technical constraints.

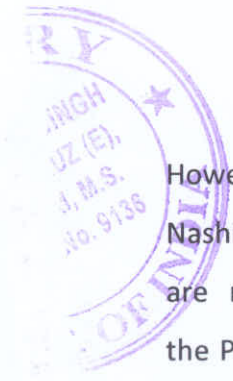
For the purpose of approving power purchase for the 3rd Control Period, the Commission has adopted the MOD principle. Accordingly, the Generators would be despatched as per MOD principles subject to technical constraints.

Further, the Final Balancing and Settlement Code also provides that constrained stations are required to be ranked earliest in the Merit Order Stack in line with Must Run Station.

*(f) For the purpose of Merit Order Stack, the "Must run" generating stations, **constrained generating stations** such as hydro stations linked to irrigation, bilateral contracts which need to be paid for in entirety irrespective of the actual amount of power consumed by the procurer and inter-state bilateral contracts which are not under the direct control of MSLDC shall be ranked earliest in the Merit Order Stack. ("Emphasis Added")*

Accordingly, the SLDC has been ranking the NASIK U-3,4,5 and BHUSAWAL U-2 &3 amongst the earliest while preparing the merit order stack.

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However, it appears that the aspect of transmission constraint of Bhusawal 3 and Nashik 3,4,5 is missed from the consideration of Hon'ble Commission and same are not considered in Merit Order Dispatch for 3rd Control Period. Accordingly, the Petitioner has not been granted power purchase cost to that extent. This is an error apparent on the face of record and need to be rectified.

The Petitioner submits that it has calculated the financial impact of the scheduling of the Bhusawal 3 and Nashik 3,4,5 in **Annexure 11** based on the power availability proposed in the MYT Petition. It works out to be Rs. 538 Crs.

The Petitioner requests the Hon'ble Commission to allow the revised power purchase cost considering the technical constraints for Bhusawal 3 and Nashik 3,4,5 and treating them as must run Stations.

The Petitioner further submits that due to non-consideration of these Units in MOD Stack, the monthly FAC increases even after revision in tariffs without any fault of the Petitioner. Also recovery of actual expenditure by way of delayed FAC severely affects the cash flow of the Petitioner. This creates unnecessary discontent amongst the consumers and financial burden due to additional cost over and above the approved tariffs.

XIII. Power Purchase from TAPS 3&4 for FY 17-18

The Petitioner submits that in MYT Order at Table 5-34, the Hon'ble Commission has approved the Power Purchase from 'Must Run' Stations/Units in 3rd Control Period. The power purchase from TAPP 3&4 has been considered as 4711 Mus instead of 3232 MUs submitted by the Petitioner. The Petitioner most respectfully submits that due to such increase an error occurred which is apparent from the records requiring correction.

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Table 24: Power Purchase from TAPP 3&4

Station/Unit	FY 17-18		FY 17-18	
	Submitted by MSEDCL		Approved by MERC	
	Energy Charges (Rs/kWh)	Power Purchase Approved (MU)	Energy Charges (Rs/kWh)	Power Purchase Approved (MU)
TAPP 3&4	2.85	3,232	2.85	4,711

It is pertinent to note that Hon'ble Commission has approved the Power Purchase quantum and cost for NPCIL Generating Stations as submitted by MSEDCL.

Thus while allowing the Power Purchase from TAPP 3&4, Hon'ble Commission has considered 4,711 MUs for FY 17-18 instead of 3,232 MUs submitted by the Petitioner. This is an error apparent on the face of record and is a valid ground for review.

Therefore, the Petitioner humbly requests the Hon'ble Commission to correct the power purchase from TAPP 3&4 based on submissions in Form 2 for FY 17-18. The Petitioner also requests the Hon'ble Commission to accordingly revise the MOD Stack for FY 17-18 and approve the revised power purchase cost and quantum for FY 17-18.

The Petitioner submits that Hon'ble Commission has considered the cost of TAPP 3&4 as Rs. 2.85 per unit. The MOD stack for FY 17-18 ends at Rs. 2.81 per unit i.e. 4 paise per unit lower than the cost of TAPP 3&4. However, considering the revision in MOD Stack, there would be some financial impact on power purchase cost for FY 17-18. However, the Petitioner has not calculated the same here due to unavailability of entire data in the MYT Order. The Petitioner most humbly requests the Hon'ble Commission to allow the net financial impact of the correction in power purchase from TAPP 3&4 for FY 17-18.

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XIV. Fixed Cost of Adani Power 1200 MW

The Petitioner submits that in Table 5-35 to 5-38, Hon'ble Commission has provided the Approved Power Purchase from Thermal Stations/Units for 3rd Control Period. However, while approving the capacity charge for FY 16-17 for Adani 1200 MW, Hon'ble Commission has considered Rs. 1.366 per unit as fixed cost per unit which in fact is for FY 17-18 and similarly for the entire Control Period. The Petitioner has submitted the IPP Rate calculations in Excel format as a reply to Query No. 127 of the Query Set 1. However, Hon'ble Commission has considered fixed rate of Rs. 1.366 per unit for FY 16-17 instead of Rs.1.386 per unit and thus there is an error apparent on the face of record. Following table provides the calculations of Fixed Cost considered by Hon'ble Commission and proposed by MSEDCL.

Table 25: Comparison of Fixed Cost for Adani 1200 MW

FY	Hon'ble Commission			MSEDCL			Impact Rs. Crs
	Quantum	Rate	Fixed Cost	Quantum	Rate	Fixed Cost	
	MUs	Rs./Unit	Rs. Crs	MUs	Rs./Unit	Rs. Crs	
FY 16-17	8,220	1.366	1,123	8,220	1.386	1,139	16
FY 17-18	8,220	1.346	1,106	8,220	1.366	1,123	16
FY 18-19	8,220	1.326	1,090	8,220	1.346	1,106	16
FY 19-20	8,243	1.307	1,077	8,243	1.326	1,093	16
Total			4,396			4,462	65

Considering the submission made by MSEDCL, there is additional impact of Rs. 65 Crs in Power Purchase. MSEDCL requests the Hon'ble Commission to correct the same and provide the additional financial impact in the ARR.

XV. Approved Revenue from Ag Unmetered Category

Hon'ble Commission at Annexure II from Page 411 of 617 has provided the Revenue from revised Tariffs effective from 1 April, 2017. In the said Annexure, for the LT IV(A): LT - AG Un-metered-Pumpsets category, the Hon'ble Commission has shown the revenue from energy charge of Rs. (15) Crs. The relevant extract of the MYT Order is annexed as **Annexure 12**.



Hon'ble Commission in the Annexure II of the MYT Order has shown the surplus revenue of Rs. 15 Crs against the energy charge for LT IV(A): LT - AG Un-metered-Pumpsets Category. However, being Unmetered, this category is charged with HP based Tariff and not per unit tariff. Therefore, in the Energy Charge column, there need not be any value. Thus, this is an error apparent on the face of record and needs correction.

Similarly, on Page 419 of 617 (Annexure III of the MYT Order) and Page 425 of 617(Annexure IV of the MYT Order)Hon'ble Commission has shown Revenue of Rs. 6 Crs and Rs. 11 Crs for FY 18-19 and FY 19-20 respectively. Thus, the revenue from revised tariffs for FY 17-18 to FY 19-20 requires correction. The Petitioner most humbly requests the Hon'ble Commission to correct the same and allow the difference.

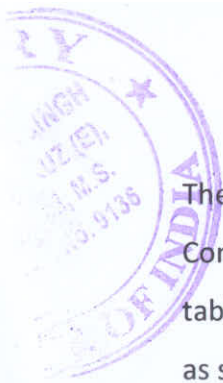
XVI. Income from Additional Surcharge

The Hon'ble Commission has approved the income from additional surcharge considering the entire open access sales (incl. CPPs) whereas Hon'ble Commission has ruled that Additional Surcharge will not be applicable to Captive Users of CPPs. This is an error apparent on the face of record and needs to be corrected.

The Petitioner submits that at Table 8-45; Hon'ble Commission has determined the additional surcharge for FY 2016-17 i.e. Rs. 1.11 per unit. Further, on Page 400; Hon'ble Commission has ruled that Additional Surcharge will not be applicable to Captive Users of CPPs to the extent of their self-consumption. The relevant portion is reproduced below for reference:

The question of "permit" and "supply" does not arise to the extent of "self-consumption" by Captive Users of the CPPs. Thus, view is that the Additional Surcharge is not applicable to Captive Users of CPPs to the extent of their self-consumption from such Plants. ("Emphasis Added")

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The Petitioner further submits that in MYT Order at Table 5-19; Hon'ble Commission has approved Energy Balance for 3rd Control Period. In the said table Hon'ble Commission has also shown the Sales to Open Access Consumers as shown in the following table.

Table 26: Sales to Open Access Consumers (Conventional) approved by Hon'ble Commission

Particulars	Units	FY 16-17	FY 17-18	FY 18-19	FY 19-20
Sales to Open Access Consumers (Conventional) MUs	MU	6,165	6,412	6,668	6,935

It is pertinent to note that the above Open Access sales includes around 50% sales is in the nature of Captive OA transactions to which Additional Surcharge will not be applicable. The Petitioner also submits that the Hon'ble Commission in MYT Order at Table 5-91 has approved Income from Additional Surcharge for 3rd Control Period as shown in the following Table.

Table 27: Income from Additional Surcharge approved by Hon'ble Commission

Particulars	FY 16-17	FY 17-18	FY 18-19	FY 19-20
Income from Additional Surcharge (Rs. Crs)	284	710	738	768

Considering the approved sales to Open Access consumers and approved the additional surcharge for FY 2016-17 (Rs. 1.11 per unit), it is clearly evident that the Hon'ble Commission has applied the additional surcharge to the entire quantum of sales to Open Access consumers which is including CPPs. Considering the levy of additional surcharge to non-Captive consumers, the income from additional surcharge is higher by 50%.

Thus there is an error apparent on the face of record in the calculations of income from additional surcharge. Therefore, the Petitioner most humbly requests the Hon'ble Commission to correct the error and compute the income from additional surcharge considering the sales only to non CPP Open Access consumers.

Considering the approved Income from Additional Surcharge for 3rd Control Period; the net impact on the revenue gap would be addition of Rs. 1250 Crs for the Control Period as shown in below table.

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Table 28: Impact of Income from Additional Surcharge

Particulars	FY 16-17	FY 17-18	FY 18-19	FY 19-20
Approved Income from Additional Surcharge (Rs. Crs)	284	710	738	768
Revised Income from Additional Surcharge (Rs. Crs)	142	355	369	384
Total Impact (Rs. Crs)	1250			

The Petitioner most humbly requests the Hon'ble Commission to allow the financial impact of Rs. 1250 Crs.

XVII. Sharing of Gains/Losses for MYT Control Period

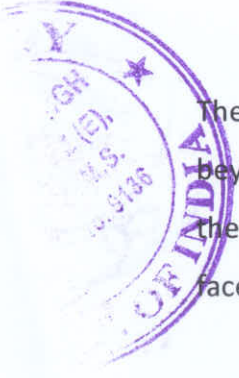
The Petitioner submits that the Hon'ble Commission at Table 5-87 of the MYT Order has calculated the impact of Sharing of additional Power Purchase burden owing to re-instatement of Distribution Loss.

The Petitioner most respectfully submits that the MYT Regulations 2015 clearly state that the sharing of gains and losses shall be done at the time of Mid-term Review. The relevant provision is reproduced below:

8.4 Upon completion of the Mid-term Review, the Commission shall pass an order recording:—

- (a) the approved aggregate gain or loss to the Generating Company or Licensee or MSLDC on account of controllable factors for the **Years 2015-16 and 2016-17 and provisional Truing-up for the Year 2017-18**, and the amount of such gains or such losses that may be shared in accordance with Regulation 11 ;*
- (b) the approved aggregate gain or loss to the Generating Company or Licensee or MSLDC on account of uncontrollable factors for the **Years 2015-16 and 2016-17, and provisional Truing-up for the Year 2017-18**, and the amount of such gains or such losses that were not recovered during the respective years and which may be shared in accordance with Regulation 10; (“**Emphasis Added**”)*

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Therefore, the exercise of sharing of gains and losses for the 3rd Control Period is beyond the purview of the proceedings of impugned MYT Order of MSEDCL for the period from FY 2016-17 to FY 2019-20. Thus, this is an error apparent on the face of record and needs to be undertaken during the Mid Term Review only.

The Petitioner is passing through precarious financial situation and its Balance sheet is already stressed. Further, due to such advance sharing of loss, the Petitioner will be further adversely affected and its ability to invest for loss reduction will further strain. Thereby making it extremely difficult to achieve the approved loss trajectory.

The Petitioner therefore most humbly requests the Hon'ble Commission consider the sharing of losses only during the Mid Term Review as per the provisions of the MYT Regulations 2015 and accordingly allow the financial impact of Rs. 1978 Crs to the Petitioner.

XVIII. O&M Expenses for MYT Control Period

The Petitioner most respectfully submits that on 17th September 2016, it has submitted a Miscellaneous Application in the MYT Petition (Case No. 48 of 2016). Hon'ble Commission has now scheduled a hearing in this matter on 12th January 2017 (Case No. 123 of 2016). The Petitioner most respectfully submits that the major thrust of the said Misc. Application was on the modification of MYT Regulations 2015 to the extent applicable for MSEDCL for determination of O&M Expenses. Therefore, the Petitioner most humbly requests the Hon'ble Commission to hear both the matters (the Misc. Application and this Petition) separately.

The MYT Regulations 2015 provided the WPI/CPI based norms for calculation of Operation and Maintenance Expenses which results in much lower unrealistic approval for O&M Expenses.




The Petitioner humbly submits that the earlier provision for the O&M Expenses as per MYT Regulations 2011 permitted recovery on the basis of wheeled energy, consumer base and opening of gross fixed assets. This base principle is applicable at present also and should have been the factor for deciding the base for the respective year. There has been substantial increase in the sales; consumer base and GFA for the Petitioner in last 4 years.

The WPI/CPI methodology provided in MYT Regulations 2015 covers the aspects of inflation/deflation only. The Petitioner submits that the WPI/CPI based norms don't consider the increase in consumer base which necessitates increase in number of offices, sales and Distribution Network i.e. Gross Fixed Assets. The Petitioner submits that such norms based on WPI/CPI are suitable for stable networks or for Licensees where the boundaries are not expanding such as Mumbai Licensees. In Mumbai, the no. of consumers are increasing within selected Distribution area, whereas the Petitioner has been extending supply to remote uncovered area also and strengthening its network & presence in hitherto scantily covered area. Through various Schemes, it has been intensifying electrification in already scantily covered area as well as reaching to new uncovered area. Some of the schemes which are under implementation at various levels are DDUGVY, IPDS, Infra Plan II. Considering the extensive infrastructure addition that is likely to happen in MSEDCL area, the O&M is bound to increase. The additional infrastructure will require additional manpower, additional R&M and thereby increased operations and maintenance. The WPI/CPI methodology doesn't take into account such factors.

The Petitioner, moreover, submits that the Employee cost constitutes around 75% of the total O&M expenses. The Petitioner submits that the employee expenses don't escalate at a lower rate worked out as per the norms specified by the Hon'ble Commission in its MYT Regulations 2015, rather they increase periodically related to Pay Commission reports of all government employees. The pay revision as per Pay Commission is after 10 years whereas at MSEDCL it is after 5 years. Considering the approved O&M Expenses and large share of

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Employee Expenses, the Petitioner is left with very less amount for R&M activities thereby putting additional strain on the R&M Costs. The situation will further aggravate after marginal increase that may be required or any increase in salary and wages.

In fact the O&M Expenses approved for FY 19-20 are even lower than the O&M Expenses approved for FY 15-16. Hence, on this ground only, the CPI/WPI Methodology in MYT Regulations 2015 cannot be implemented fully since the same does not cover the escalation also.

The Petitioner further submits that Operation and Maintenance expense being a controllable cost; any variation in O&M Expenses will add financial burden on the Petitioner without any fault by way of sharing of gains/losses. The Petitioner most respectfully submits that the lower O&M Expenses means severe restrictions on the operations and maintenance works and will consequently result into adverse impact on quality of power supply and consumer services.

In view of the submissions in foregoing paragraphs, the Petitioner requests Hon'ble Commission to approve the O&M expenses considering realistic trend as proposed in its MYT Petition as shown below.

Table 29: Projected O&M Expenses by MSEDCL in MYT Petition

Rs. Crs

Ensuing Years	FY 16-17	FY 17-18	FY 18-19	FY 19-20
Projected O&M Expenses	7,388	8,192	9,410	10,394

The Petitioner humbly submits that these expenses are absolutely necessary for the operations of the Petitioner and has been projected at a reasonable level and therefore, may be considered sympathetically.

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XIX. RPO Regulatory Charge for Shortfall in RPO Compliance for FY 2013-14

Hon'ble Commission at Paragraph 6.5 of the MYT Order has estimated the cost of compliance if shortfall in RPO Compliance for FY 2013-14 is met by way of purchase of RECs at the floor price as Rs 260.33 Crore (Rs 161.72 Crore for Non Solar + Rs 98.61 Crore for Solar).

The Petitioner submits that it has sought reliefs in terms of carrying forward of RPO shortfall and also in terms of setting aside the ruling to the extent of disallowance of expenditure on purchase of RECs and/or actual power procurement to the extent of the shortfall not met by MSEDCL by the end of FY 2015-16. (Case No. 44 of 2016).

Main Prayers of the said Petition:

- To set aside the ruling in Order dated 4th August 2015 in Case No. 190 of 2014 to the extent of disallowance of expenditure on purchase of RECs and/or actual power procurement to the extent of the shortfall not met by MSEDCL by the end of FY 2015-16.
- To consider the ground realities and historical capacity addition in Mini/Micro Hydro Sector in the State and cancel the separate categorization of Mini/Micro Hydro RPO target.
- To allow MSEDCL to carry forward the shortfall not met by MSEDCL by the end of FY 2015-16 to the next Review Period.

The Hon'ble Commission has scheduled a hearing on 20th December 2016. However, without giving the Petitioner an opportunity to plead its case, Hon'ble Commission has ruled on the MYT Order and imposed penalty of Rs. 260 Crs in MYT Order dated 3rd November 2016.

The Petitioner most respectfully submits that in absence of conclusive adjudication of Case No. 44 of 2016 such penalty is premature. The Hon'ble Commission ought to have given the Petitioner a chance to make its submission

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in the matter. Therefore, on the principle of natural justice, the Petitioner seeks the review of the penalty of Rs. 260 Crs.

MSEDCL's Plan for fulfillment of RPO

Non Solar RPO:

- MSEDCL has principally decided to execute all the pending EPAs with wind power projects (553 MW) which are commissioned in FY 2014-15 (347.15 MW) & FY 2015-16 (205.85 MW). Therefore, around 1204 additional MUs will be available for procurement as RE.
- The wind energy procurement will help in meeting the Non Solar RPO shortfall.
- The shortfall in meeting Non Solar RPO for FY 2013-14 is 1078 MUs, For FY 2014-15 is 647 MUs and For FY 2015-16 is 384 MUs.
- Balance Non Solar shortfall (905 MUs) after procurement of wind energy (1204 MUs) will be met through purchase of REC by March 2017.
- Thus, MSEDCL is taking all efforts to meet non solar RPO target upto FY 2015-16 by March 2017.

Solar RPO:

- Solar shortfall for FY 2010-11 was 212 MUs, for 2011-12 was 227 MUs & for FY 2012-13 it was 205 MUs. Cumulative shortfall of 644 MUs was allowed to be met by 2015-16 by Hon'ble Commission.
- 282 MUs Solar shortfall for FY 2013-14 was to be met by March 2016
- 276 MUs Solar shortfall for FY 2014-15 is to be met by March 2017
- Solar shortfall for FY 2015-16 is 158 MUs.
- Thus, Cumulative Solar shortfall till FY 2015-16 is 1360 MUs.

In the past, adequate solar capacity & therefore solar energy was not available for purchase for fulfillment of solar RPO. Now sufficient solar power as well as solar RECs are getting available.

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During the recent bidding conducted by SECI, in various MNRE schemes, the cost of solar energy has been discovered as low as Rs. 4.00 per unit (Rs. 3.93 p.u. + Rs. 0.07 margin) whereas the cost of solar REC presently is Rs. 3.50 per unit. In such situation, purchase of solar REC (without energy component) will not be advisable.

For fulfillment of Solar RPO, the Petitioner has contracted 1327 MW Solar power. Out of this, 252 MW capacity is already commissioned. 500 MW will be commissioned in FY 2016-17 and another 500 MW will be commissioned in FY 2017-18. The Petitioner has contracted 1000 MW solar power @ Rs. 4.50 p.u. (RPO benefit + energy component) from SECI under competitive bidding.

Besides, the Petitioner has given consent for procurement of around 250 MW power from the solar parks (3 X 500 MW) being installed in the State under MNRE scheme for "Development of Solar Parks & Ultra Mega Solar Projects". The commissioning is expected in FY 2017-18.

The GoM RE Policy-2015 envisages 7500 MW Solar capacity addition in coming 5 years. Around 2500 MW projects will be developed by MSPGCL under PPP mode. Out of the above, MSPGCL is now developing a 500 MW solar power project on EPC basis. As per GoM G.R. dated 03.12.16, the Petitioner is required to purchase this solar power. The project is expected to be commissioned in FY 2017-18.

Also as per the MNRE program, 4700 MW grid connected solar rooftop projects will be installed in the State upto 2022 and the same will be counted against Solar RPO. It is expected that Solar Rooftop installation will accelerate from next year.

Recently, the MNRE has proposed a scheme for "Setting up of 10000 MW decentralized generation of solar energy projects by farmers by 2019-20". Out of above, installation of 1197 MW capacity is expected in the State.

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Thus, as per MSEDCL's plan, GoM RE Policy-2015 & MNRE schemes, the Petitioner humbly submits that sufficient solar power will be available from FY 2017-18 onwards for meeting solar RPO.

Considering these additional facts which the Petitioner could not submit at the time of MYT Proceedings since a separate proceedings (RPO Compliance) were pending before Hon'ble Commission, the Petitioner requests the Hon'ble Commission to review the reduction of ARR due to levy of RPO penalty in view of the principle of natural justice. Accordingly, the Petitioner requests the Hon'ble Commission not to deduct the RPO penalty of Rs. 260 Crs from ARR.

XX. Total Financial Impact of Review Petition

Considering the above submissions, the total financial impact of the Review Petition works out to be as shown below:

Table 30: Total Financial Impact of Review Petition

Sr. No.	Particulars	Impact (Rs. Crs)
1	Sharing of Gains/Losses for 3 rd MYT Control Period	1,978
2	Error in Energy Balance for 3 rd Control Period, Revised Ag sales and corresponding Impact of PP, RPO and Revenue	3,643
3	Income from Additional Surcharge	1,250
4	O&M Expenses for 3 rd Control Period	10,661
5	GFA reconciliation not considered for FY 14-15	
a)	Depreciation based on revised GFA for FY 14-15 to FY 19-20	1,156
b)	Interest on Long Term Interest for FY 14-15 to FY 19-20	547
c)	Return on Equity for FY 14-15 to FY 19-20 (Also Consumer contribution as per MSEDCL included)	372
d)	O&M Expenses for FY 14-15 and FY 15-16	334
e)	Contribution to Contingency Reserve for 3 rd Control Period	31
6	Prior Period Expenses/(Income) for FY 14-15	1,007
7	Sharing gains and losses for FY 15-16	2287
9	Intangible Assets Written Off for FY 14-15	10
10	A&G Expenses FY 14-15 (Refund of Penalty to APML Rs.109 Crs)	109
11	Power Purchase from Bhusawal 3 and Nashik 3,4,5	538
12	Fixed Cost of Adani Power 1200 MW	65
13	Approved Revenue from Ag Unmetered Category	2
14	RPO Penalty	260
15	Total Financial Impact of Review	24,251

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XXI. Carrying Cost on the Financial Impact of Review Petition

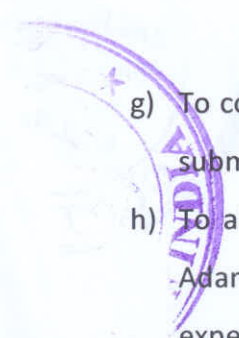
The Petitioner submits that the Hon'ble Commission in MYT Order dated 3rd November, 2016 has calculated the carrying cost and holding cost. Therefore, considering the same principle, the Petitioner most humbly requests the Hon'ble Commission to allow the carrying cost on the Financial Impact of Review Petition.

3. The Petitioner respectfully submits that from the foregoing submissions it is clear that apparent errors on the face of records are occurred in the MYT Order. It is further submitted that some important matters could not be brought to the notice of the Hon'ble Commission during the course of the hearing. Foregoing paras also establishes that there are sufficient reasons for reviewing Order
4. As per Regulation 85 of the MERC (Conduct of Business) Regulations, 2004, the Hon'ble Commission has got ample jurisdiction to review its directions and orders.

5. Prayers

- 5.1. The Petitioner therefore, based on the submission made in the foregoing paragraphs, most respectfully prays to this Hon'ble Commission:
 - a) To admit the Petition as per the provisions of the Section 94 (1) (f) of the Electricity Act 2003 read with Regulation 85 (a) of the Maharashtra Electricity Regulatory Commission (Conduct of Business) Regulations 2004;
 - b) To allow the Review of the MYT Order dated 3rd November 2016 passed by Hon'ble Commission;
 - c) To consider the submission made by the Petitioner and consider the same positively while deciding the Petition;
 - d) To correct the percentage of GFA amount considered for Wires Business for calculation of O&M Expenses for FY 15-16;
 - e) To consider the no. of consumers for MSEDCL as submitted for calculation of O&M Expenses for FY 14-15;
 - f) To consider the GFA Reconciliation submitted by the Petitioner and accordingly revise the Depreciation, Interest on Loans, Return on Equity and contribution to contingency reserves;

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- g) To consider the consumer contribution and grants for FY 14-15 and FY 15-16 as submitted by the Petitioner in MYT Petition;
- h) To allow Miscellaneous Expenses of Rs.109 Crs (Refund of penalty charged to Adani Power Maharashtra Ltd) separately over and above the normative O&M expenses;
- i) To allow Intangible Assets Written Off during FY 14-15;
- j) Not to consider the Excess Provision for Depreciation in Prior Period Expenses;
- k) Not to consider the Efficiency Loss due to restatement of Distribution Loss in FY 2015-16 before the Mid Term Review;
- l) To revise Energy Balance for FY 15-16 based on energy at Distribution Periphery as submitted by Petitioner;
- m) To consider the realistic sales growth for HT I Industrial Category;
- n) To correct the LT AG sales for 3rd Control Period based on the approved sales for FY 14-15 and FY 15-16;
- o) To correct the Energy Balance for 3rd Control Period based on MSEDCL submission in the present Petition;
- p) To treat Bhusawal 3 and Nashik 3,4,5 as Must Run Stations and allow power purchase from them for the 3rd Control Period;
- q) To correct the Power Purchase from TAPS 3&4 for FY 17-18 and allow its impact of same;
- r) To correct the Fixed Cost of Adani Power (1200 MW) Plant and allow its financial impact;
- s) To allow the net impact of LT AG sales revision by considering the revision in the energy balance, power purchase cost and revenue from Ag sales;
- t) Not to deduct the RPO penalty of Rs. 260 Crs from ARR;
- u) To correct the error in calculation of Income from Additional Surcharge for the 3rd Control Period;
- v) Not to consider the sharing of Efficiency Loss on account of Distribution Loss restatement before the Mid Term Review;
- w) To allow the O&M Expenses as projected by the Petitioner in MYT Petition in Case No. 48 of 2016;
- x) To allow the depreciation on the total GFA including grants;

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- y) To allow the carrying cost on the Financial Impact of this Review Petition;
- z) To allow the recovery of the Financial Impact of Review Petition by way of suitable mechanism;
- aa) To condone any error/omission and to give opportunity to rectify the same;
- bb) To permit the Petitioner to make further submissions, addition and alteration to this Petition as may be necessary from time to time.

Executive Director (Commercial)

MSEDCL

Annexure 1: Number of Consumers submitted in Reply to Query 6

Annexure 1: 1-No of Consumers
ALL ZONES Excluding All DF

Category	FY 2015	FY 2016 (Sep 15) Incl ABD and JLG
HT Category		
HT I - Industries	12,097	12,794
HT I-Cont (Express Feeders)	1,921	1,883
HT I-Non Cont (Non Express Feeders)	9,611	10,404
HT I - Seasonal Category	565	507
HT II Commercial	2,823	2,905
HT II (Express Feeder)		
Educational Institutes		
Others	410	401
HT II (Non Express Feeder)		
Educational Institutes	2413	2,504
Others		
HT III Railways	42	44
HT IV- Public Water Works (PWW)	911	946
Express Feeders	486	515
Non-Express Feeders	425	431
HT V - Agricultural	1,060	1,051
HT-Poultry/SP.AG	266	292
HT VI - Bulk Supply	217	231
Residential Complex	217	231
Commercial Complex		-
HT GROUP HOUSING	116	121
HT VIII Temporary Supply	12	9
HT MSPGCL AUX.SUPPLY	23	24
HT - Public Services Govt		287
Express Feeders		84
Non-Express Feeders		203
HT - Public Services Other	1,067	857
Express Feeders	208	150
Non-Express Feeders	859	707
HT-X PORT	3	3
TOTAL HT Category	18,637	19,564
LT Category		
LT I Domestic	15,995,977	16,747,310
BPL (0-30 Units)	343,632	265,457
Consumption > 30 Units Per Month	15,652,345	16,481,853
LT II Non Domestic	1,481,239	1,564,263
0-20 kW	1,461,254	1,542,645

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Category	FY 2015	FY 2016 (Sep 15) Incl ABD and JLG
>20- 50 kW	16,438	17,637
>50 kW	3,547	3,981
LT III Public Water Works	47,629	48,713
0-20 kW	46,646	47,493
20-40 kW	780	855
40-50 kW	203	365
LT IV Agriculture	3,819,489	3,877,634
Unmetered Tariff	1,596,734	1,595,187
Metered Tariff (Including Poultry Farms)	2,222,755	2,282,447
LT V Industries	285,588	297,756
0-20 KW	235,960	243,332
Above 20 KW	49,628	54,424
LT Powerloom	32,755	33,406
0-20 KW	29,237	29,263
Above 20 KW	3,518	4,143
LT VI Street Light	81,987	84,753
Grampanchayat, A, B & C Class Municipal Council	64,344	58,712
Municipal Corporation Areas	17,643	26,041
LT VII Temporary Connection	2,221	2,751
Temporary Connections (Other Purposes)	1,808	1,985
Temporary Connections (Religious)	413	766
LT VIII Advertisement and Hoarding	1,775	1,972
LT IX – Crematoriums & Burial Grounds	116	128
LT PUBLIC SERVICES Govt		8,456
0-20 kW		8,315
>20- 50 kW		103
>50 kW		38
LT PUBLIC SERVICES Others	70,427	66,485
0-20 kW	68,609	64,446
>20- 50 kW	1,271	1,430
>50 kW	547	609
LT PREPAID	14,937	14,617
TOTAL LT CATEGORY	21,834,140	22,748,244
Total MSEDCL excluding all DF	21,852,777	22,767,808

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Annexure 2: progress of the works executed under Infra II Scheme

Circle wise Capex and Capitalisation and Works Executed under Infra II

SR NO.	Name of Circle	Infra Plan- II	
		Expenditure	Capitalisation
1	AHEMADNAGAR	107.56	112.47
2	AKOLA	0.00	0.00
3	AMRAVATI	14.68	3.63
4	AURANGABAD (R)	34.22	32.45
5	AURANGABAD (U)	0.00	0.00
6	BARAMATI	200.59	121.83
7	BEED	35.00	29.73
8	BHANDARA	25.13	17.64
9	BHIWANDI	0.00	0.00
10	BULDHANA	43.07	22.59
11	CHANDRAPUR	18.53	20.10
12	DHULE	37.43	25.33
13	GADCHIROLI	0.00	1.30
14	GANESHKHIND	249.74	184.43
15	GONDHIA	56.23	59.28
16	HINGOLI	30.63	33.98
17	JALANA	33.19	21.31
18	JALGAON	92.43	203.39
19	KALYAN I	0.00	0.00
20	KALYAN II	18.32	15.39
21	KOLHAPUR	47.72	38.94
22	LATUR	21.36	23.26
23	NAGPUR (R)	53.21	54.60
24	NAGPUR (U)	0.00	0.00
25	NANDED	66.90	34.61
26	NANDURBAR	0.00	0.00
27	NASIK(R)	126.65	103.07
28	NASIK(U)	79.68	43.44
29	OSMANABAD	40.14	29.21

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SR NO.	Name of Circle	Infra Plan- II	
		Expenditure	Capitalisation
30	PARBHANI	12.84	16.25
31	PEN	73.26	60.66
32	PUNE(R)	168.54	124.85
33	RASTAPETH	166.72	105.31
34	RATNAGIRI	57.38	42.86
35	SANGLI	66.55	49.90
36	SATARA	78.97	92.39
37	SINDHUDURG	13.62	2.70
38	SOLAPUR	176.34	182.10
39	THANE (U)	0.61	2.02
40	VASAI	43.02	33.68
41	VASHI	316.10	269.57
42	WARDHA	0.00	0.00
43	WASHIM	0.00	0.00
44	YAVATMAL	69.97	33.13
	TOTAL	2676.33	2247.40

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ASSETS COMMISSIONED DURING 2015-2016 UNDER INFRA-II SCHEME

Month	New Sub Station (No.)	Augmentation of Power Transformer (No.)	Additional Power Transformer (No.)	New DTC (No)	Augmentation of DTC (No)	HT Line (Km.)	LT Line (Km.)
Apr-15	1	3	3	956	455	389	444
May-15	3	10	8	1090	442	412	569
Jun-15	3	8	2	563	372	295	283
Jul-15	4	11	9	1160	621	437	630
Aug-15	15	9	8	1437	535	567	672
Sep-15	1	10	11	1169	686	614	717
Oct-15	11	14	12	1176	570	650	565
Nov-15	16	8	13	1160	542	424	467
Dec-15	9	6	15	1180	507	608	699
Jan-16	13	5	10	1111	385	685	753
Feb-16	18	8	3	1235	506	507	532
Mar-16	9	7	6	1780	536	999	1156
Total 15-16	103	99	100	14017	6157	6587	7488

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New Substation Commissioned Under Infra-II During FY 2015-16

Sr. No.	Zone	Name of Substation	Capacity in MVA	Date of Commissioning	Sr. No.	Zone	Name of Substation	Capacity in MVA	Date of Commissioning
1		Isrul	5	08.10.2015	53		Garwad	5	22.01.2016
2		Kalmabeshwar	5	10.11.2015	54		Gunjegaon	5	15.05.2015
3		Shendurjana	5	11.12.2015	55		Ingalgini	5	06.08.2015
4		Narayankhed	5	26.02.2016	56		Devdi	5	30.12.2015
5		Jambhuldhaba	5	22.03.2016	57		Bibidarpal	5	27.11.2015
6		Bhalegaon (K)	5	15.03.2016	58		Kalman	5	05.08.2015
7		Bhalegaon (M)	5	12.03.2016	59		Patri	5	26.03.2016
8		Pimpalgaon	5	11.03.2016	60		Jategaon	5	21.11.2015
9	Amravati	Murli	5	23.12.2015	61		Hingni K	5	03.02.2016
10	Gondia	Kohmara	5	26.02.2016	62		Korti	5	14.01.2016
11		Hudkeshwar	2 X 5	10.08.2015	63		Uplai	5	17.01.2016
12	Nagpur	Dhapewada	2 X 5	04.01.2016	64		Bhend	5	14.08.2015
13		Mandgaon	5	25.01.2016	65		Comfort zone (SW)	5	22.10.2015
14		Tadali	5	26.11.2015	66		Saimistic Ambegaon (SW)	--	15.03.2016
15	Chandrapur	Chiroli	5	10.07.2015	67	Pune	Urban gram (SW)	--	31.10.2015
16		Chankpiranji	5	01.08.2015	68		Rehu	--	02.02.2016
17	Nashik	Belgaon Dhaga	2 X 5	28.01.2016	69			5	14.01.2016

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Sr. No.	Zone	Name of Substation	Capacity in MVA	Date of Commissioning	Sr. No.	Zone	Name of Substation	Capacity in MVA	Date of Commissioning
18		Khamtane	5	30.07.2015	70		Polemras		
19		Patharwadi (Jawla)	5	02.01.2016	71		Loni	5	12.11.2015
20		Pimpalgaon Rotha	5	23.02.2016	72		Shivange (Pargaon)	5	04.08.2015
21		Loni Mavla	5	01.08.2015	73		Pimpri Pendar	5	04.05.2015
22		Georai	5	19.12.2015	74		Netwad	5	19.11.2015
23		Devgaon	5	03.11.2015	75		Wagholi (SW)	--	26.10.2015
24		Rajapur	5	18.04.2015	76		Kukadgaon	5	11.09.2015
25		Kangar	5	27.08.2015	77		Khakarmoha	5	31.03.2016
26		Vikhran Sindkheda	5	30.11.2015	78		Salegaon	5	25.02.2016
27		Langhane	5	23.02.2016	79	Latur	Sadola	5	26.02.2016
28		Vikhran shirpur	5	30.12.2015	80		Chatrabortgaon	5	26.02.2016
29		Kapadne	5	16.10.2015	81		Chilwadi	5	20.08.2015
30		Burzad	5	22.05.2015	82		Dorla	5	17.06.2015
31	Jalgaon	Pinjarzadi	5	01.10.2015	83		Pimpalgaon (L)	5	02.06.2015
32		Chinchkheda	5	30.01.2016	84		Madaj	5	04.02.2016
33		Tikora	5	31.01.2016	85		Somthan	5	24.08.2015
34		Choupale	5	16.03.2016	86	Nanded	Asta	5	21.08.2015
35		Vadji	5	26.02.2016	87		Koli	5	21.08.2015
36	Aurangabad	Hiwara	2 X 5	10.11.2015	88		Jahur	5	18.01.2016
							Sahapur	5	07.12.2015

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Sr. No.	Zone	Name of Substation	Capacity in MVA	Date of Commissioning	Sr. No.	Zone	Name of Substation	Capacity in MVA	Date of Commissioning
37	Baramati	Bhambarda	5	16.11.2015	89	Kalyan	Pimpalgaon T	5	23.10.2015
38		Chandanpuri	5	10.11.2015	90		Ramtakli	5	30.01.2016
39		Bor Ranjani	5	10.02.2016	91		Pothra	5	10.12.2015
40		Nimbut	2 X 5	15.06.2015	92		Contessa	5	07.08.2015
41		Shelgaon	2 X 5	27.02.2016	93		Mahape (SW)	--	12.02.2016
42		Loni Bapkar	2 X 5	11.07.2015	94		Rabale (SW)	--	12.02.2016
43		Tanu	2 X 5	20.11.2015	95		Visapur	5	01.12.2015
44		Lasurne	2 X 5	20.01.2016	96		Nagnoor	5	28.07.2015
45		Loni MIDC	2 X 5	19.11.2015	97		Awde Alte	2 X 10	22.02.2016
46		Morgaon	2 X 5	29.10.2015	98		Koregaon	5	27.11.2015
47	Nimon	2 X 5	20.10.2015	99	Renavi	5	02.02.2016		
48	Ravangaon	2 X 5	17.11.2015	100	Dahiwadi	5	23.12.2015		
49	Rajale	2 X 5	31.11.2015	101	Sinddhewadi	5	08.02.2016		
50	Wadgaon Haweli	5	28.08.2015	102	Majarde	5	21.10.2015		
51	Sangola shahar	5	25.08.2015	103	Nagewadi (Anjani)	5	01.10.2015		
52	Dasur	5	15.03.2016						

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Aug. Of Power T/F Commissioned Under Infra-II during FY 2015-16

Sr. No.	Zone	Name of Sub station	Capacity in MVA	Date of Comm.	Sr. No.	Zone	Name of Sub station	Capacity in MVA	Date of Comm.	Sr. No.	Zone	Name of Sub station	Capacity in MVA	Date of Comm.
1	Akola	Panaj	5 to 10	28.01.2016	51	Nashik	Takli miya	3.15 to 5	11.07.2015					
2		Akoli	3.15 to 5	20.12.2015	52		MIDC	3.15 to 5	12.05.2015					
3		Hanuman Nagar	3.15 to 5	23.12.2015	53		Satral	3.15 to 5	02.08.2015					
4		Wadali	3.15 to 5	27.12.2015	54		Kharda	5 to 10	09.01.2016					
5		Navasari 1	3.15 to 5	31.03.2016	55		Bordi	3.15 to 5	20.05.2015					
6		Navsari 2	3.15 to 5	31.03.2016	56		Bamne	3.15 to 5	06.06.2015					
7	Amravati	Mankopra	3.15 to 5	19.08.2015	57		Aurala	3.15 to 5	30.05.2015					
8		Ghonsa	3.15 to 5	27.07.2015	58		Pishor	3.15 to 5	30.05.2015					
9		Parwa	3.15 to 5	08.10.2015	59	Aurangabad	Banoti	3.15 to 5	30.05.2015					
10		Shembal Pimpri	3.15 to 5	19.11.2015	60		Savaladbara	3.15 to 5	30.05.2015					
11		Gaul	3.15 to 5	20.11.2015	61		Golegaon	3.15 to 5	30.05.2015					
12		Kondha	5 to 10	13.05.2015	62		Parinche	5 to 10	14.09.2015					
13	Gondia	Pauni	2X5 to 2X10	31.10.2015	63		Kurkumbh 1	5 to 10	15.09.2015					
14		Dongari Bazar	3.15 to 5	27.07.2015	64	Baramati	Kurkumbh 2	5 to 10	15.09.2015					
15		Pachgaon	5 to 10	31.03.2016	65		Dapodi 1	5 to 10	14.08.2015					
16	Nagpur	Wanadongri	5 to 10	12.01.2016	66		Pargaon 1	5 to 10	31.08.2015					

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Sr. No.	Zone	Name of Sub station	Capacity in MVA	Date of Comm.	Sr. No.	Zone	Name of Sub station	Capacity in MVA	Date of Comm.	Sr. No.	Zone	Name of Sub station	Capacity in MVA	Date of Comm.
17		Kannamvargram	3.15 to 5	10.09.2015	67		Pargaon 2	5 to 10	26.11.2015	67		Pargaon 2	5 to 10	26.11.2015
18		Dahiwad	3.15 to 5	26.08.2015	68		Warvand	5 to 10	17.11.2015	68		Warvand	5 to 10	17.11.2015
19		Dayane wadgaon	3.15 to 5	09.01.2016	69		Patas	5 to 10	29.10.2015	69		Patas	5 to 10	29.10.2015
20		Dongsaudane	5 to 10	08.10.2015	70		Deoogaon Raje	5 to 10	28.10.2015	70		Deoogaon Raje	5 to 10	28.10.2015
21		Jategaon	3.15 to 5	05.12.2015	71		Shirasgaon Kata	5 to 10	22.09.2015	71		Shirasgaon Kata	5 to 10	22.09.2015
22		Bopegaon	3.15 to 5	23.11.2015	72		Mandaongaon pharata	5 to 10	15.10.2015	72		Mandaongaon pharata	5 to 10	15.10.2015
23		Deogaon	3.15 to 5	29.06.2015	73		Navhra	5 to 10	10.10.2015	73		Navhra	5 to 10	10.10.2015
24		Ghotan	3.15 to 5	26.09.2015	74		Tragaon	5 to 10	22.05.2015	74		Tragaon	5 to 10	22.05.2015
25		Wadala 1	3.15 to 5	02.10.2015	75		Jamb	5 to 10	04.06.2015	75		Jamb	5 to 10	04.06.2015
26		Wadala 2	3.15 to 5	30.10.2015	76		Songaon	5 to 10	28.04.2015	76		Songaon	5 to 10	28.04.2015
27		Yeli	3.15 to 5	05.02.2016	77		Akluj 1	5 to 10	08.09.2015	77		Akluj 1	5 to 10	08.09.2015
28		Keli sangli	3.15 to 5	16.04.2015	78		Akluj 2	5 to 10	08.09.2015	78		Akluj 2	5 to 10	08.09.2015
29		Shindi	3.15 to 5	10.10.2015	79		Velapur	5 to 10	31.03.2016	79		Velapur	5 to 10	31.03.2016
30		Shirdi	5 to 10	24.08.2015	80		Hinjewadi phase 2	3.15 to 10	16.05.2015	80		Hinjewadi phase 2	3.15 to 10	16.05.2015
31		Aradgaon 1	3.15 to 5	21.07.2015	81	Pune	Ghodegaon	5 to 10	04.02.2016	81	Pune	Ghodegaon	5 to 10	04.02.2016
32		Aradgaon 2	3.15 to 5	21.07.2015	82		Hiware	5 to 10	25.02.2016	82		Hiware	5 to 10	25.02.2016
33		Aradgaon 3	3.15 to 5	17.02.2016	83		Kesapuri	3.15 to 5	31.07.2015	83		Kesapuri	3.15 to 5	31.07.2015
34		Ambi 1	3.15 to 5	12.09.2015	84		Sawargaon	3.15 to 5	12.06.2015	84		Sawargaon	3.15 to 5	12.06.2015
35		Ambi 2	3.15 to 5	05.02.2016	85	Latur	Bansarola	3.15 to 5	18.07.2015	85	Latur	Bansarola	3.15 to 5	18.07.2015
36		Hasnapur 1	3.15 to 5	07.06.2015	86		Malumbra	3.15 to 5	09.12.2015	86		Malumbra	3.15 to 5	09.12.2015
37		Hasnapur 2	3.15 to 5	01.08.2015	87		Tamalwadi	3.15 to 5	08.12.2015	87		Tamalwadi	3.15 to 5	08.12.2015

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Sr. No.	Zone	Name of Sub station	Capacity in MVA	Date of Comm.	Sr. No.	Zone	Name of Sub station	Capacity in MVA	Date of Comm.	Sr. No.	Zone	Name of Sub station	Capacity in MVA	Date of Comm.
38		Hasnapur 3	3.15 to 5	06.11.2015	88		Avsa	3.15 to 5	12.10.2015				5	
39		Loni 1	3.15 to 5	23.11.2015	89	Nanded	Sarsam	3.15 to 5	10.08.2015				5	
40		Loni 2	3.15 to 5	24.11.2015	90		Mahur	3.15 to 5	08.03.2016				5	
41		Devlali	3.15 to 5	15.02.2016	91		CBD Sector 6	5 to 10	02.02.2016				5	
42		Haregaon 1	3.15 to 5	11.07.2015	92	Bhandup	Kamothe	5 to 10	21.04.2015				5	
43		Haregaon 2	3.15 to 5	01.08.2015	93		New panvel sector 7	5 to 10	22.07.2015				5	
44		Mamdapur 1	3.15 to 5	22.06.2015	94	Ratnagiri	Pachal	3.15 to 5	21.01.2016				5	
45		Mamdapur 2	3.15 to 5	20.07.2015	95		Mangaon	5 to 10	05.10.2015				5	
46		Mamdapur 3	3.15 to 5	07.10.2015	96		PIE	5 to 10	27.02.2016				5	
47		Matapur 1	3.15 to 5	08.06.2015	97	Kolhapur	Awde mala	5 to 10	07.03.2016				5	
48		Matapur 2	3.15 to 5	26.10.2015	98		PIE	5 to 10	14.03.2016				5	
49		Sutgirmi	5 to 10	06.09.2015	99		Borgaon	5 to 10	14.07.2015				5	
50		Taklibhan	3.15 to 5	20.06.2015										

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Addl. Power T/F Commissioned Under Infra-II during FY 2015-16

Sr. No.	Zone	Name of Sub Station	Capacity in MVA	Date of Comm.	Sr. No.	Zone	Name of Sub Station	Capacity in MVA	Date of Comm.
1	Akola	Barshitakli	5	03.11.2015	51	Baramati	Parinche	5	17.09.2015
2		Dhaba	5	17.12.2015	52		Pisarve	5	07.11.2015

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Sr. No.	Zone	Name of Sub Station	Capacity in MVA	Date of Comm.	Sr. No.	Zone	Name of Sub Station	Capacity in MVA	Date of Comm.	Sr. No.	Zone	Name of Sub Station	Capacity in MVA	Date of Comm.
3		Manatri	5	02.02.2016	53		Pirachi kuroli	5	12.05.2015					
4		Masalpen	5	30.07.2015	54		Shevte	5	26.08.2015					
5		Shelubazar	5	31.07.2015	55		Brahmapuri	5	20.08.2015					
6		Civil lines	5	10.12.2015	56		Khupsugi	5	13.05.2015					
7		Mop	5	04.12.2015	57		Manjari	5	27.08.2015					
8		Matargaon	5	29.07.2015	58		Fondsiras	5	15.03.2016					
9		Chandol	5	27.08.2015	59		Nimgaon	10	15.05.2015					
10		Dhamangaon	5	24.09.2015	60		Vithhalwadi	5	04.06.2015					
11		Muradpur	5	29.09.2015	61		Tandulwadi	5	19.03.2016					
12		Mangrul Navghare	5	10.10.2015	62		Karkal	5	24.11.2015					
13		Kingaon Raja	5	12.12.2015	63		Karmala	5	23.05.2016					
14		Shingaon Jahagir	5	23.12.2015	64		Surali	5	28.05.2015					
15		Mozari	5	09.12.2015	65		Paith	5	14.01.2016					
16	Amravati	Rajur	5	30.09.2015	66	Pune	Khed shivapur	10	06.11.2015					
17	Gondia	Hiwra	5	18.08.2015	67		Sanghavi nagar	10	21.11.2015					
18	Nagpur	Paradsinga	5	01.11.2015	68		Manjursubha	5	26.08.2015					
19		Somthane	5	12.03.2016	69		Daskhed	5	24.08.2015					
20		Ajang	5	21.12.2015	70	Latur	Shirasmarg	5	03.11.2015					
21	Nashik	Nagaon	5	16.01.2016	71		PadalsHING	5	29.10.2015					
22		Askheda	5	11.09.2015	72		Dinrul	5	27.11.2015					

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Sr. No.	Zone	Name of Sub Station	Capacity in MVA	Date of Comm.	Sr. No.	Zone	Name of Sub Station	Capacity in MVA	Date of Comm.	Sr. No.	Zone	Name of Sub Station	Capacity in MVA	Date of Comm.
23		Shirur	5	13.02.2016	73		Sawarga	5	08.12.2015					
24		Shivre Chikhlambe	5	08.01.2016	74		Shirla	5	04.02.2016					
25		Kasar Pimpalgaon	5	17.04.2015	75		Jewali	5	18.07.2015					
26		Bhanashiwra	5	31.10.2015	76		Borgaon	5	18.07.2015					
27		Karajgaon	5	13.01.2016	77		Atirikt MIDC	5	31.12.2015					
28		Belapur	5	22.10.2015	78		Avrad	5	02.07.2015					
29		Bhokar	5	24.11.2015	79		Barbada	5	04.12.2015					
30		Bargaon Nanduri	5	01.12.2015	80		Krusnur	5	05.10.2015					
31		Hingni	5	29.12.2015	81		Karkheli 1	5	18.01.2016					
32		Bhambora	10	08.01.2016	82		Karkheli 2	5	18.01.2016					
33		Kasare	5	17.04.2015	83	Naded	Dongarkada	5	31.12.2015					
34		Balne	5	06.06.2015	84		Goregaon	5	31.10.2015					
35		Indave	5	26.07.2015	85		Matasab	5	12.01.2016					
36		Jai Nagar	5	16.10.2015	86		Tuppa	5	30.11.2015					
37	Jalgaon	Jamthi	5	29.12.2015	87	Bhandup	Kalpataru	10	31.07.2015					
38		Kinhi MIDC	5	24.03.2016	88		Balinga	5	04.03.2016					
39		Kurhe	5	19.03.2016	89		Chandur	5	28.01.2016					
40		Virwade	5	06.08.2015	90		Bhosarwad	5	08.09.2015					
41		Wadawli	5	08.12.2015	91	Kolhapur	Nandani	5	28.09.2015					
42	Aurangabad	Jategaon	5	03.09.2015	92		Dhamod	5	02.10.2015					
43		Ranjangaon (Kh)	5	21.10.2015	93		Phalkewadi	5	30.04.2015					

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Sr. No.	Zone	Name of Sub Station	Capacity in MVA	Date of Comm.	Sr. No.	Zone	Name of Sub Station	Capacity in MVA	Date of Comm.
44		Pokhari	5	23.11.2015	94		Karoli T	5	01.06.2015
45		Chapner	5	05.10.2015	95		Sonyal	5	20.07.2015
46		Chincholi (L)	5	05.10.2015	96		Tikondi	5	29.05.2015
47		Andhari	5	05.10.2015	97		Sanmadi	5	30.09.2015
48		Hiwrakabali	5	10.01.2016	98		Karve MIDC	5	06.05.2015
49	Baramati	Pandare	5	13.11.2015	99		Bhikwadi	5	05.09.2015
50		Kalewadi	5	20.11.2015	100		Wangi	5	24.09.2015

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Progress of works under Infra II as on 31.03.2016

Name of Zone	Contract Cost in Crs.	New Substation				Augmentation of Power Transformer				Additional Power Transformer				Distribution Transformer				Augmentation of DTC				HT Line				LT Line				
		Scope	Freezing Scope	Milestone	Achievement	WIP	Freezing Scope	Milestone	Achievement	WIP	Freezing Scope	Milestone	Achievement	WIP	Freezing Scope	Milestone	Achievement	WIP	Freezing Scope	Milestone	Achievement	WIP	Freezing Scope	Milestone	Achievement	WIP	Freezing Scope	Milestone	Achievement	
Bhandup	400	19	17	16	4	10	5	5	5	0	3	3	2	1	596	493	416	52	355	258	334	0	683	513	288	29	602	560	319	36
Kolhapur	510	48	46	44	12	11	12	10	0	0	35	33	25	5	3874	3571	2142	260	2374	2133	1576	24	2633	2407	887	112	2317	2145	899	51
Kalyan	443	37	32	32	2	16	3	3	2	1	0	0	0	0	1509	1509	992	181	608	608	526	1	1859	1819	560	214	694	694	361	96
Konkan	105	10	9	9	3	4	2	2	2	0	3	3	1	2	536	515	370	146	235	235	213	14	619	576	261	162	497	497	210	89
Baramati	869	125	90	88	48	37	30	27	27	3	63	62	58	4	6614	6569	5644	355	1575	1575	1403	0	4284	4282	3010	642	3826	3789	2929	483
Pune	687	45	46	35	21	17	3	3	3	0	11	11	9	0	2310	2073	1716	174	1276	1218	1135	2	2058	1653	1159	91	2655	1950	1729	248
Latur	252	41	41	39	18	14	15	8	8	7	36	36	21	12	2274	2274	1782	281	432	432	324	0	1718	1718	855	150	1515	1515	1327	77
Nanded	250	34	35	28	11	13	6	5	2	0	17	11	9	3	2140	1290	1280	155	1091	732	707	0	1935	1283	847	152	1468	788	752	63
Nagpur Urban	210	18	23	18	6	7	15	14	8	6	6	4	2	2	1369	1211	464	82	467	366	352	0	1183	979	373	65	517	501	233	37
Gondia	87	9	9	8	3	5	6	4	3	2	3	1	1	0	580	525	205	48	0	0	0	0	479	447	119	43	612	419	198	18
Chandrapur	142	7	8	4	3	4	1	0	0	0	1	0	0	0	757	749	333	92	20	20	20	0	968	884	209	76	251	242	57	13
Aurangabad	256	29	29	24	6	18	6	6	5	1	32	31	15	10	2861	2333	1602	495	0	0	0	0	2072	1535	960	352	2037	1885	769	133
Nashik	951	102	104	82	18	32	83	80	59	11	61	47	29	16	8515	7057	4323	570	3226	2800	2081	66	4867	3977	1653	213	5380	4620	1727	154
Jalgaon	238	38	38	26	17	17	2	2	2	0	24	14	11	7	2218	1260	1243	126	861	107	88	0	1652	936	639	108	900	449	255	76
Akola	282	29	29	15	9	10	1	0	0	0	21	11	14	3	2127	1124	923	219	970	200	458	0	1499	645	513	136	2187	1321	613	117
Amaravati	252	16	16	9	2	9	18	10	13	4	10	6	2	3	2009	1081	715	226	1025	316	431	0	1325	559	342	89	1489	730	410	69
Total	5934	607	572	477	183	224	208	188	149	35	326	273	199	68	40289	33634	24150	3462	14515	11000	9648	107	29833	24211	12675	2635	26946	22103	12788	1758

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Annexure 3 : Regulatory Format 8

Maharashtra State Electricity Distribution Company Ltd.
MYT Petition Formats - Distribution & Retail Supply
Form B: Return on Regulatory Equity



Sr. No.	Particulars	FY 2014-15		FY 2015-16		FY 2016-17		FY 2017-18		FY 2018-19		FY 2019-20	
		MYT Order (a)	April-March (Audited) (b)	True-Up requirement (c) = (b) - (a)	MTR Order* (d)	Estimated (e)	Provisional True-Up requirement (f) = (e) - (d)	Projected	Projected	Projected	Projected	Projected	Projected
1	Capital Expenditure		3128		6143		9990		8917		7031		6864
a	Less: Grant		316		1392		3796		4501		4345		4304
b	Capital Expenditure incurred (excl Grants)		2812		4751		6194		4416		2686		2560
2	Equity												
a	Internal Accrual		1050		144		293		267		167		50
b	GoM Equity		255		612		700		300		50		50
c	Consumer contribution		352		110		110		50		50		50
3	Total Equity		953		646		883		518		117		-
4	Equity portion of capital expenditure 4 = (3 / 1 b)		33.90%		13.60%		14.25%		11.72%		4.35%		0.00%
5	Assets Capitalization												
a	Capitalisation		3854		5596		9300		9044		7286		7855
b	Assets Capitalisation I to be consider in proportionate to 1 b)		3464		4328		5766		4479		2784		2631
6	Equity portion of Assets Capitalisation (upto 30%) with Impact of Equity portion of assets retired during the year		1036		589		822		525		121		-
7	Balance Equity Portion to be treated as Loan		138		-		-		-		-		-

A) Distribution Wires Business

Sr. No.	Particulars	FY 2014-15		FY 2015-16		FY 2016-17		FY 2017-18		FY 2018-19		FY 2019-20	
		MYT Order (a)	April-March (Audited) (b)	True-Up requirement (c) = (b) - (a)	MTR Order* (d)	Estimated (e)	Provisional True-Up requirement (f) = (e) - (d)	Projected	Projected	Projected	Projected	Projected	Projected
1	Regulatory Equity at the beginning of the year	7,700	7,780	8,410	8,713	9,242	9,982	10,455	10,563	10,455	10,563	10,455	10,563
2	Capital Expenditure incurred (excl Grants)		2,531		4,276		3,974		2,418		2,304		2,304
3	Equity portion of capital expenditure	630	858		582	794	466	105	466	105	466	105	466
4	% of Equity portion of capital expenditure		33.90%		13.60%		11.72%		4.35%		0.00%		0.00%
5	Assets Capitalization		3,118		3,895		5,189		4,031		2,505		2,366
6	Equity portion of Assets Capitalisation		933		530		740		473		109		109
7	Regulatory Equity at the end of the year	8,410	8,713	9,130	9,242	9,982	10,455	10,563	10,455	10,563	10,455	10,563	10,563
8	Return on Capitalization												
9	Return on Regulatory Equity at the beginning of the year - 15.5%*(1)	1205.9	1,206	1,304	1,350	693	749	1,620	1,637	1,620	1,637	1,620	1,637
10	15.5%*(6)/2	49	72	-	41	28	18	8	8	8	8	8	8
11	Interest on Equity portion above 30% @11.83%p.a.												
12	Total Return on Regulatory Equity	1,255	1,286	31	1,406	736	781	1,644	1,644	1,644	1,644	1,644	1,652

Note: * - In case MTR Order is yet to be issued, then MYT Order values to be captured under this column

B) Retail Supply Business

Sr. No.	Particulars	FY 2014-15		FY 2015-16		FY 2016-17		FY 2017-18		FY 2018-19		FY 2019-20	
		MYT Order (a)	April-March (Audited) (b)	True-Up requirement (c) = (b) - (a)	MTR Order* (d)	Estimated (e)	Provisional True-Up requirement (f) = (e) - (d)	Projected	Projected	Projected	Projected	Projected	Projected
1	Regulatory Equity at the beginning of the year	864	864	934	968	1026	1109	1161	1161	1161	1161	1161	1173
2	Capital Expenditure incurred (excl Grants)		281		475		442		269		256		256
3	Equity portion of capital expenditure	70	95		65	88	52	12	52	12	52	12	52
4	% of Equity portion of capital expenditure		33.90%		13.60%		11.72%		4.35%		0.00%		0.00%
5	Assets Capitalization		346		433		577		448		276		263
6	Equity portion of Assets Capitalisation		104		80		59		53		12		12
7	Regulatory Equity at the end of the year	934	968	1,014	1,026	1,109	1,161	1,173	1,173	1,173	1,173	1,173	1,173
8	Return on Capitalization												
9	Return on Regulatory Equity at the beginning of the year - 17.5%*(1)	151	151	164	169	77	83	203	203	203	203	203	205
10	17.5%*(30%*(5)/2	6	9	-	5	3	2	1	1	1	1	1	1
11	Interest on Equity portion above 30% @11.83%p.a.												
12	Total Return on Regulatory Equity	157	161	4	176	82	87	206	206	206	206	206	207

Note: * - In case MTR Order is yet to be issued, then MYT Order values to be captured under this column

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Annexure 4: Revised O&M Expenses for FY 14-15 & FY 15-16 (Wires Business)

Sr. No.	Particulars	Units	FY 14-15	FY 15-16
1. A)	Composite O&M Norms (Wire Business)			
1	O&M Expenses Norm specified in Regulations			
1.1	For Wheeled Energy	paise/kWh	13.57	14.34
1.2	For No. of Consumers in Wires Business	Rs Lakh/ '000 Consumers	7.00	7.40
1.3	For R&M Expenses	% of GFA	4.00%	4.00%
2	Parameters for O&M Expenses			
2.1	Wheeled Energy	MU	102,454	111,028
2.2	No. of Consumers in Wires Business Excl DF	'000 Consumers	21,824	22,330
2.3	Opening GFA Excl DF	Rs. Crore	33,103	36,699
3	Cost of O&M Expenses			
3.1	Wheeled Energy	Rs. Crore	1,390	1,592
3.2	No. of Consumers in Wires Business	Rs. Crore	1,528	1,652
3.3	Opening GFA	Rs. Crore	1,324	1,468
1. A)	Total O&M Expenses (Wire Business)	Rs. Crore	4,242	4,713
	O&M Expenses Approved by MERC (Wires)	Rs. Crore	4,138	4,527
	Additional Impact	Rs. Crore	104	185

Annexure 5: Revised O&M Expenses for FY 14-15 & FY 15-16 (Supply Business)

Sr. No.	Particulars	Units	FY 2014-15	FY 2015-16
2. A)	Composite O&M Norms (Supply Business)			
1	O&M Expenses Norm specified in Regulations			
1.1	For Sales in Supply Business	paise/kWh	9.40	9.94
1.2	For No. of Consumers in Supply Business	Rs Lakh/ '000 Consumers	4.85	5.13
1.3	For R&M Expenses	% of GFA	0.50%	0.50%
2	Parameters for O&M Expenses			
2.1	Sales	MU	85,975	84502
2.2	No. of Consumers in Supply Business Excl DF	'000 Consumers	21,824	22,330
2.3	Opening GFA Excl DF	Rs. Crore	3,678	4,078
3	Cost of O&M Expenses			
3.1	Wheeled Energy	Rs. Crore	808	840
3.2	No. of Consumers in Wires Business	Rs. Crore	1,058	1,146
3.3	Opening GFA	Rs. Crore	18	20
2. B)	Total O&M Expenses (Supply Business)	Rs. Crore	1,885	2,006
	O&M Expenses Approved by MERC (Supply)	Rs. Crore	1,841	2,005
	Additional Impact	Rs. Crore	44	1

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Annexure 6: Revised contribution to Contingency Reserve for 3rd Control Period

Rs. Crs

Particulars	FY 16-17	FY 17-18	FY 18-19	FY 19-20
Revised Opening GFA by MSEDCL	46,317	54,774	60,552	62,626
Computed by MSEDCL	116	137	151	157
Approved by MERC	108	129	144	149
Additional Impact	8	8	7	8

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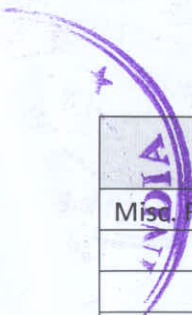
Annexure 7: Non-Tariff income for FY 13-14

Sr. No.	Particulars	Amount (Rs. Crs)
A.	Interest Income	
1	Interest on Staff Loans and Advances	0.30
2	Income from Investments in Bank Deposits	
3	Interest on Other Investments	16
4	Interest from Consumers	990
5	Interest on advance to suppliers/ Contractors	
6	Interest from Banks (other than Fixed Deposits)	0
7	Interest from Franchisee	1
	SUB TOTAL A	1,008
B.	Other Non-operating Income	
1	Sale of Scrap	33
2	Depreciation transferred on assets created from Consumer contribution Grants, subsidy	63
3	Income transferred from deferred income	1
4	Delayed Payment Charges from Consumers	223
5	Sale of tender forms	5
6	Rebate on prompt payment to bulk power supplier	61
7	Open access charges	16
8	Miscellaneous Receipts	228
	SUB TOTAL B	633
	TOTAL (A+B)	1,640

The Details of Miscellaneous Receipts are as follows:

Particulars	Amount (Rs. Crs)
Rental from staff Quarters	0.99
Rental from Contractors	0.06
Income from Hire Charges from contractors & others.	0.30
Income from Rental- other Building	0.07
Recovery for Transport and vehicle Expenses	0.00
Sundry Credit	5.09
Commission for collection Of Elect. Duty	0.86
Income from supervision charges of stores	0.17
Registration Fees	0.46
Ground Rent	0.04
Meter Testing Charges	2.75
CT/PT Testing Charges	1.10
Processing Fees for Shifting Charges	2.21
Processing Fees for open Access by consumers	0.37
Processing Fees for open Access by Generation	0.06

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Particulars	Amount (Rs. Crs)
Misc. Receipt	213.73
<u>Liquidated Damages from M/s Adani Power Maharashtra Ltd</u>	126.39
<i>Claim RTGS By IREDA</i>	0.31
<i>Claim RTGS By IREDA</i>	0.88
<i>Claim RTGS By IREDA</i>	2.77
<i>Misc income pertaining all Circle</i>	83.38
Grand Total	228.25

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Annexure 8: Revised Efficiency Loss due to restatement of Distribution Loss in FY 2015-16

Particulars	Unit	FY 15-16
Normative Distribution Loss	%	13.50%
Actual Distribution Loss	%	18.24%
Actual Energy Input at Distribution periphery	MU	116,148
Normative Loss	MU	15,680
Normative Sale including OA & credit sale	MU	100,468
Actual Sale including OA & credit sale	MU	94,965
Lower sales due to higher Loss	MU	5,503
ABR	Rs/unit	6.20
Lower sales due to higher Loss	Rs Crs	3,412
Efficiency Loss to be retained by MSEDCL	Rs Crs	2,275

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Annexure 9: HT I Industrial Sales in FY 16-17

Mus

Category	Apr-16	May-16	Jun-16	Jul-16	Aug-16	Sept-16
HT-IND.(EXPRESS)	680	728	729	677	699	643
HT-IND.(NON-EXPRESS)	1134	1169	1115	1061	1093	1068
HT-SEASONAL	6	4	2	2	1	1
HT Industries Total	1820	1902	1846	1740	1793	1712
HT Industries (Approved)	2,076	2,079	2,021	2,081	1,979	1,943

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Annexure 10: net impact of additional PP, RE Power and revenue from LT Ag Sales and HT I Industries

Sr. No.	Particulars	Unit	FY 16-17	FY17-18	FY 18-19	FY 19-20	Total
1	Additional Power Purchase	Mus	1,715	1,968	2,123	2,341	8,146
2	Additional RE Power	Mus	189	246	292	351	1,078
3	Additional Non RE Power	Mus	1,526	1,722	1,831	1,990	7,068
4	PP rate (MOD Ends on)	Rs./Unit	2.90	2.81	2.90	2.91	2.88
5	Additional Non RE Cost	Rs. Crs	443	484	531	579	2,036
6	RE Rate (Solar+Non Solar)	Rs./Unit	5.74	5.74	5.74	5.74	
7	Additional RE Cost	Rs. Crs	108	141	168	202	618
8	Ag Sales	Mus	1,189	1,370	1,566	1,776	5,902
9	Ag ABR	Rs./Unit	3.00	3.00	3.00	3.00	
10	Additional Ag Revenue	Rs. Crs	357	411	470	533	1,771
11	Reduction in HT Industrial Sales	Mus	979	952	828	740	3,499
12	HT Industrial ABR	Rs./Unit	7.85	7.87	7.9	7.92	
13	HT Industrial Revenue Loss	Rs. Crs	769	750	654	586	2,758
14	Net Increase in Revenue Gap (5+7-10+13)	Rs. Crs					3,643

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Annexure 11: Additional Impact of Bhusawal 3 and Nashik 3,4,5

Particulars		Unit	Bhusawal - 3	Nashik 3,4 & 5	Additional Burden in Rs. Crs
FY 16-17	Availability	MUs	1127	3193	118
	VC	Rs./Unit	3.18	3.17	
	MOD Ends	Rs./Unit	2.9	2.9	
	Difference	Rs./Unit	0.28	0.27	
FY 17-18	Availability	MUs	1065	3193	162
	VC	Rs./Unit	3.19	3.19	
	MOD Ends	Rs./Unit	2.81	2.81	
	Difference	Rs./Unit	0.38	0.38	
FY 18-19	Availability	MUs	1086	2947	122
	VC	Rs./Unit	3.21	3.20	
	MOD Ends	Rs./Unit	2.9	2.9	
	Difference	Rs./Unit	0.31	0.3	
FY 19-20	Availability	MUs	1190	3201	136
	VC	Rs./Unit	3.22	3.22	
	MOD Ends	Rs./Unit	2.91	2.91	
	Difference	Rs./Unit	0.31	0.31	

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Annexure 12: Revenue from revised tariffs for LT IV(A): LT - AG Un-metered-Pumpsets

Category	No. of Consumers	Fixed/Demand Charge	Variable Charges			Energy Sales (MU)	Connected Load/ Contract Demand (HP)	Revenue (Rs. Crore)					Average Billing Rate (Rs./ kWh)	
			Unit	Rate	Energy Charge (paise/ kWh)			Wheeling Charge (paise/ kWh)	Fixed / Demand Charge	Energy Charge	Wheeling Charge	Total Revenue		ToD Rebate
LT IV(A): LT - AG Un-metered-Pumpsets (Category 1 Zones)						4,729	3,871,411	1,479	10	581	2,070	-	2,070	4.38
(a) 0 - 5 HP		Rs./HP/Month	309		125	3,310	2,709,987	1,005	5	414	1,424	-	1,424	4.30
(b) > 5 HP - 7.5 HP		Rs./HP/Month	341		125	1,308	1,070,783	438	7	164	609	-	609	4.65
(c) Above 7.5 HP		Rs./HP/Month	381		125	111	90,640	41	-1	14	54	-	54	4.89
LT IV(A): LT - AG Un-metered-Pumpsets (Category 2 Zones)						3,027	2,372,800	652	-26	356	981	-	981	3.24
(a) 0 - 5 HP		Rs./HP/Month	212		125	2,119	1,660,960	423	-13	249	659	-	659	3.11
(b) > 5 HP - 7.5 HP		Rs./HP/Month	247		125	225	176,340	52	-12	26	67	-	67	2.96
(c) Above 7.5 HP		Rs./HP/Month	275		125	683	535,500	177	-1	80	256	-	256	3.75
LT IV(A): LT - AG Un-metered-Pumpsets (Sub-Total)	1,190,617					7,756	6,244,210	2,136	-15	947	3,068	-	3,068	3.96

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