



**Maharashtra State Electricity Distribution Company Limited**  
(A Govt. of Maharashtra Undertaking)  
CIN No.:U 40109MH2005SGC153645

5<sup>th</sup> floor, Prakashgad, Plot No.G-9, Bandra (East), Mumbai – 400 051 ☎ (O) 26474211  
Email : cepp@mahadiscom.in Website : www.mahadiscom.in

CE/PP/MSEDCL/Addl Submission/297 of 2018/29987

Date: 20/12/2018

To,  
The Secretary,  
Maharashtra Electricity Regulatory Commission  
World Trade Centre,  
Cuffe Parade, Colaba,  
Mumbai- 400 005.

Sub: Petition seeking recovery of annual fixed cost component in respect of MSEDCL for the energy supplied to the State pool, recovery of differential amount to be recovered towards variable rate, removal of anomalies and directions in regards to overdrawl by Mumbai utilities in Balancing and Settlement Mechanism as per provision of ABT Order dated 17.05.2007 in Case No 42 of 2006 in the matter of introduction of Availability Based Tariff Regime at State level within Maharashtra and other related issues\_Case No 297 of 2018

**-Additional submission**


Respected Sir,

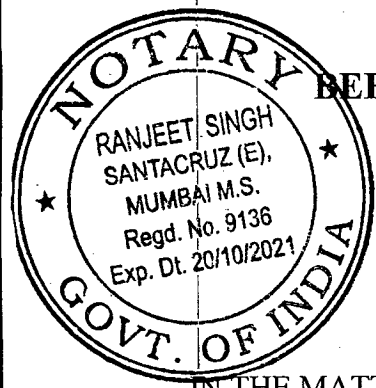
This has reference to above cited subject. Please find enclosed herewith MSEDCL's additional submission in Case No 297 of 2018 in Petition filed by MSEDCL for seeking recovery of annual fixed cost component in respect of MSEDCL for the energy supplied to the State pool, recovery of differential amount to be recovered towards variable rate, removal of anomalies and directions in regards to overdrawl by Mumbai utilities in Balancing and Settlement Mechanism as per provision of ABT Order dated 17.05.2007 in Case No 42 of 2006 in the matter of introduction of Availability Based Tariff Regime at State level within Maharashtra and other related issues.

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

Thanking You.

Yours faithfully,

  
Chief Engineer (Power Purchase)



BEFORE THE HON'BLE MAHARASHTRA ELECTRICITY  
REGULATORY COMMISSION, MUMBAI

FILING NO-

CASE NO- of 2018

IN THE MATTER OF

Petition seeking recovery of annual fixed cost component in respect of MSEDCL for the energy supplied to the State pool, recovery of differential amount to be recovered towards variable rate, removal of anomalies and directions in regards to overdrawl by Mumbai utilities in Balancing and Settlement Mechanism as per provision of ABT Order dated 17.05.2007 in Case No 42 of 2006 in the matter of introduction of Availability Based Tariff Regime at State level within Maharashtra and other related issues

AND

IN THE MATTER OF

Regulation 94 and 96 of MERC (Conduct of Business) Regulations, 2004

MAHARASHTRA STATE ELECTRICITY DISTRIBUTION COMPANY LTD PETITIONER;

The Chief Engineer (Power Purchase),  
Maharashtra State Electricity Distribution Co. Ltd  
Plot No G-9, Prakashgad, 5th floor, Station Road,  
Bandra (East), Mumbai – 400051  
E-mail : ceppmsedcl@gmail.com

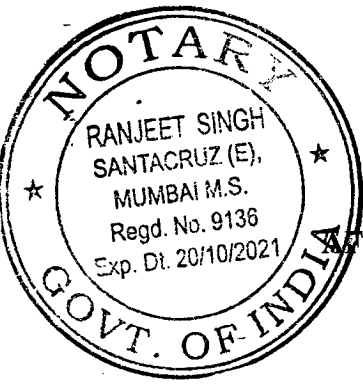
.....PETITIONER

AND

IN THE MATTER OF

Maharashtra State Load Despatch Centre,  
Thane-Belapur Road, P.O. Airoli,  
Navi Mumbai – 400 708

..... RESPONDENT



**AFFIDAVIT ON BEHALF OF PETITIONER (MSEDCL) VERIFYING THE PETITION**

I, PARESH RAMCHANDRA BHAGWAT, aged 46 Years, son of RAMCHANDRA BHAGWAT, having my office at 5th Floor, Prakashgad, Bandra (East), Mumbai-400051 do solemnly affirm and say as follows:

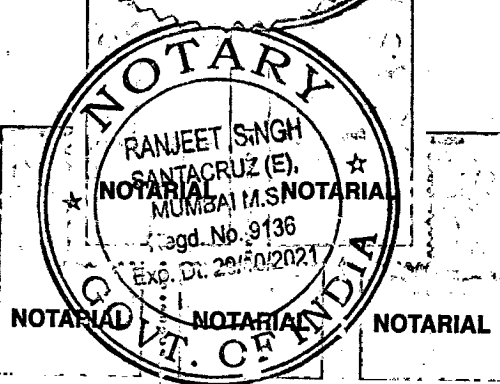
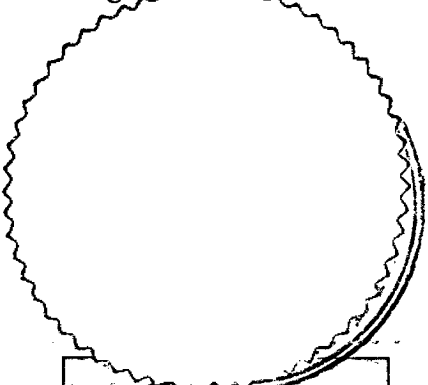
1. I am the Chief Engineer (Power Purchase) of Maharashtra State Electricity Distribution Co. Ltd., the Review Petitioner in the above matter and am duly authorized competent to make this affidavit.
2. The statements made in paragraphs of the petition are true to my knowledge and belief and statements made in paragraphs one to three are based on information and I believe them to be true.
3. I say that there are no proceedings pending in any court of law/ tribunal or arbitrator or any other authority, wherein the Petitioner is a party and where issues arising and/or reliefs sought are identical or similar to the issues arising in the matter pending before the Commission.

Solemnly affirm at Mumbai on this 16<sup>th</sup> day of October-2018 that the contents of the above affidavit are true to my knowledge, no part of it is false and nothing material has been concealed therefrom.

Identified before me

Mumbai

Date-16<sup>th</sup> October-20



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

**BEFORE ME**

**RANJEET SINGH**  
M.Sc.LL.B.  
NOTARY  
MAHARASHTRA  
GOVT. OF INDIA

**6 OCT 2018**



BEFORE THE HON'BLE MAHARASHTRA ELECTRICITY  
REGULATORY COMMISSION, MUMBAI

Filing No

Case No. of 2018

**IN THE MATTER OF**

Petition seeking recovery of annual fixed cost component in respect of MSEDCL for the energy supplied to the State pool, recovery of differential amount to be recovered towards variable rate, removal of anomalies and directions in regards to overdrawl by Mumbai utilities in Balancing and Settlement Mechanism as per provision of ABT Order dated 17.05.2007 in Case No 42 of 2006 in the matter of introduction of Availability Based Tariff Regime at State level within Maharashtra and other related issues.

**AND**

**IN THE MATTER OF**

Regulation 94 and 96 of MERC (Conduct of Business) Regulations, 2004

**IN THE MATTER OF:**

Maharashtra State Electricity Distribution Company Limited  
5th Floor, Prakashgad,  
Plot No. G-9, Bandra (East),  
Mumbai - 400051

**... PETITIONER**

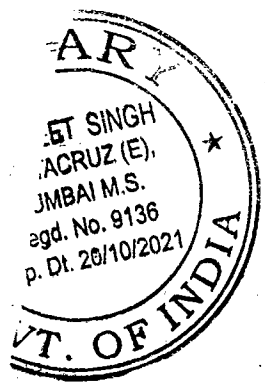
**VERSUS**

Maharashtra State Load Despatch Centre,  
Thane-Belapur Road, P.O. Airoli,  
Navi Mumbai - 400 708

**... RESPONDENT**

**Background:**

1. Maharashtra State Electricity Distribution Company Limited (hereinafter to be referred "MSEDCL") is a Company constituted under the provisions of Government of Maharashtra General Resolution No. PLA - 1003 / C. R. 8588 dated 25th January 2005 and is duly registered with the Registrar of Companies,



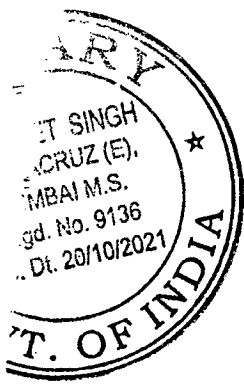
Mumbai on 31st May 2005. MSEDCL is functioning in accordance with the provisions envisaged in the Electricity Act, 2003 and is engaged, within the framework of Electricity Act, 2003, in the business of distribution of electricity to its consumers situated over the entire State of Maharashtra, except Mumbai City & its suburbs (excluding Mulund & Bhandup).

2. This petition is being submitted by Maharashtra State Electricity Distribution Company Limited has filed a Petition for,
  - i. seeking recovery of annual fixed cost component in respect of MSEDCL for the energy supplied to the State pool alongwith carrying cost,
  - ii. seeking recovery of differential amount to be recovered towards variable rate alongwith carrying cost,
  - iii. removal of anomalies and
  - iv. directions in regards to overdrawl by Mumbai utilities,

in Final Balancing and Settlement Mechanism as per provision of ABT Order dated 17.05.2007 in Case No 42 of 2006 in the matter of introduction of Availability Based Tariff Regime at State level within Maharashtra.
3. The National Electricity Policy (NEP) was notified by Central Government on 12 February, 2005. The clause 5.7.1(b) of the NEP mandates Appropriate Commissions to introduce Availability Based Tariff (ABT) mechanism at State level.
4. In line with the above mentioned clause of NEP, Maharashtra Electricity Regulatory Commission (MERC) issued the referred Order on 17 May, 2007 in Case No. 42 of 2006 regarding "Introduction of Availability Based Tariff Regime at State level within Maharashtra and other related issues" (Intra-State ABT Order).
5. As per the Commission's Order, MSLDC developed Interim Balancing and Settlement Mechanism (IBSM) for carrying out balancing and settlement till the finalisation of Final Balancing and Settlement Mechanism (FBSM). IBSM was applicable from 1 October, 2006. Accordingly, billing under IBSM was started by MSLDC from 30 July, 2007 for period October 2006 onwards. The billing under IBSM was "Weighted Average System Marginal Price" (WASMP) based but on monthly basis.



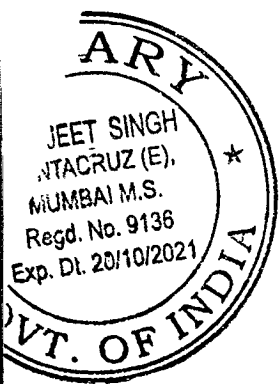
6. After completion of SEM metering at all locations and availability of data at MSLDC, the method of energy accounting and billing was to be shifted to FBSM.
7. FBSM was implemented on 1 August, 2011 after approval of the Commission on 23 August, 2009 and after overcoming the constraints in its implementation. The Commission, vide its letter dated 7 July, 2011, also directed MSLDC to implement FBSM immediately and sort out the issues during implementation phase.
8. MSEDCL submits that the Final Energy and balancing Settlement Mechanism i.e. FBSM is unscheduled interchange settlement mechanism in Maharashtra and is exceptionally different kind in India. In rest of the states, energy settlement mechanism is in line with that DSM mechanism as notified by CERC. The FBSM mechanism is Weighted Average System Marginal Price (WASMP) based whereas DSM is "System frequency linked "based.
9. It is submitted that from the beginning of its implementation of this mechanism, MSLDC, the implementing agency, experienced certain issues in operation of FBSM. Hence MSLDC filed a Petition (Case No. 56 of 2012) before Hon'ble Commission on 08.06.2012 for removal of difficulties in the matter of operation and implementation of the Intra-State ABT Order in Case No. 42 of 2006. The issues were as follows:
  - i. Control of Intra-state STOA transactions under State MOD.
  - ii. Constraint of ramping rate of thermal generators in operation of State MOD on 15 min block basis.
  - iii. Real time MOD & control of hydro stations like Koyna.
  - iv. Surplus scenarios in monsoon/winter.
  - v. Consideration of wind, hydro and other generators in net UI-II.
  - vi. State's imbalance in the pool & its relation with deviations in net UI-I & II.
  - vii. Treatment of OA generators frequently changing status between Inter-State/Intra-State transactions.
  - viii. Allocation of additional UI (penal UI charges for frequency below 49.50 Hz).
  - ix. Sharing of TPC generation between TPC-D & BEST.



- x. Metering of Unit wise generation.
- xi. Difference in rates of UI at Regional level & Intra-State WASMP.
- xii. Migrated consumers of R-Infra to TPC.
- xiii. POC deviation bills (RTDA) & Congestion Charges.
- xiv. Incorporating RRF settlements in pool.
- xv. Implementation of RGMO.
- xvi. MOD principle and position of generators contracted with Mumbai utilities

10. MSEDCL, vide its letters dtd 09.08.2012, 05.11.2012 has also filed its submissions to Hon'ble Commission to Petition filed by MSLDC (Case No 56 of 2012) for removal of difficulties in the matter of operation and implementation of the Intra-State ABT Order. The comments submitted were as follows:

- a. The SLDC's primary responsibility shall thus be the secure and economic operation of the state grid. The Intra-state ABT Mechanism introduced in the state requires the SLDC to ensure the state MOD. However , certain technical aspects hinders the economic operation of the state grid as already presented to the Hon'ble Commission by the SLDC through its Petition No. 56 of 2012.
- b. One of the primary objectives of the EA 2003 is to protect the interest of the consumers. Certain Provisions of the MERC ABT Order results in undue burden on the pool participants, mainly distribution licensees, which results in financial burden on the end consumers and thus defeats the primary objectives of the Act. Decentralized self dispatch by participants should provide a solution to this problem
- c. The prevailing Three Stage Settlement Mechanism is too complex and is difficult to comprehend. A simple Single Stage Settlement mechanism where all the participants are brought on a level playing field and the unscheduled interchanges with the Regional grid is treated at par with the Central UI Regulations in force is essential for the state.
- d. Utility wise Load Generation Balance (LGB) to be implemented in order to ensure economic dispatch.
- e. Instate generators to be brought under the ambit of the intra-state ABT mechanism to bring about disciplined operation by the generators i.e. the UI charges for the deviations from the schedule are borne by the respective generators to avoid undue burden on the consumers.



- f. Open access generators selling power to inter-state buyers could benefit from this and gaming by them cannot be ruled out as they are assured of payments at the contracted sale rates.
- g. The under injection by the generators who become pool participants in view of their multiple Intra-state contracts / Inter-state contracts become liable to pay to the pool for the quantum of under injection with reference to their schedule but the charges thus payable are generally at a very nominal rate. The detailed comments are annexed as **Annexure-I**.

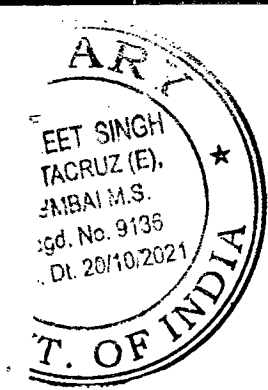
**Formation of FBSM Committee to review of present FBSM Mechanism and MERC Oder for new de-centralised mechanism:**

11. It is submitted that to address the issues raised by MSLDC and utilities, Hon'ble Commission, vide Order dated 28.03.2013, formed a Committee under the Chairmanship of Dr. S. A. Khaparde, Professor (Electrical Dept.), IIT, Mumbai and various representatives from VeermataJijabai Technological Institute (VJTI), Western Region Load Despatch Centre (WRLDC), State Transmission Utility (STU), State Load Despatch Centre (SLDC), MERC and all DISCOMs in the State of Maharashtra. The scope of work for the above referred Committee was to carry out a Zero Base Review of Balancing and Settlement Mechanism for Intra-State ABT In Maharashtra as compared to the system prevalent for Inter-State ABT in Rest of India and submit its report within a period of 3 months. The Committee submitted its report on the Zero Base Review along with its recommendations on 4 September, 2013 which is attached here as **Annexure II**.

MSEDCL's views as submitted to FBSM Committee are as follows:

- I. For more transparency and economic despatch composite cost (Fixed + Variable) methodology can be adopted for MoD stack and variable cost can be used for SMP calculations.
- II. Centralized Despatch with existing FBSM mechanism subject to some modification in respect of allocation of net UI charges to utilities is the best methodology to optimum utilization of resources within State and economic despatch of Maharashtra state.
- III. Hydro should be used for contracted Discom only and not as ancillary service.
- IV. The existing FBSM mechanism is prone to gaming.





- V. FBSM send proper price signal for encouraging / discouraging generation/loads as and when required. But if the generators are made to borne deviation charges, they will be encouraged to adhere to their schedule generation.
- VI. The State UI mechanism is not in line with Central UI.
- VII. The single stage mechanism where all instate generators will be made SPPs and UI settlement of the utility in the State will be done at SMP of the utility as per present methodology, and Central UI settlement will be done at frequency rate.
- VIII. It is required to prepare monthwise Provisional / Revised State Energy Account (SEA) in line with monthly Regional Energy Account (REA) issued by WRPC.

12. The Commission after considering the recommendations of the Committee on Zero Base Review and comments/suggestions of distribution licensees & MSLDC on the Committee Report issued an Oder vide its order dtd 11.04.2014.(Annexure-III)

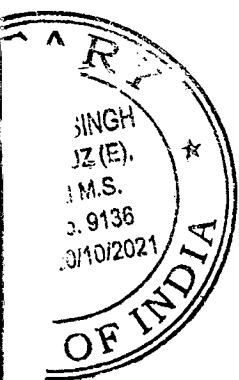
The summary of this Order was as following:

- A. Implementation of de-centralized scheduling and frequency linked deviation settlement mechanism in Phase I; and
- B. Implementation of State level customization in Phase II, for improving balancing and settlement mechanism after ensuring successful implementation of Phase-I.

The implementation of Phase-I involves,

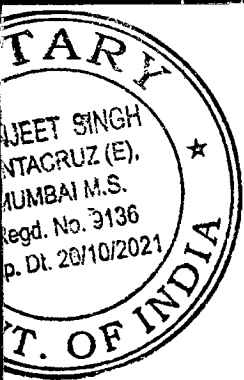
- I. Publishing a detailed Consultation Paper on the proposed balancing and settlement mechanism;
- II. Stakeholder discussions including knowledge dissemination on the proposed mechanism;
- III. Finalisation of balancing and settlement mechanism and submission of draft BSM code to the Commission; and
- IV. Submission of proposal for the changes/amendments to existing Regulations and proposal for formulation of new Regulations, if required

13. The Commission entrusted Maharashtra State Power Committee (MSPC) the responsibility to lead the revision of balancing and settlement code in Maharashtra by carrying out the steps identified above in the Order dtd 11.04.2014. Accordingly,



MSPC prepared draft concept paper regarding new de-centralised mechanism in the state and circulated in June-2014 & again in Sept-14 after some amendments to all utilities including all major generating companies in the State for their study and comments. (Annexure IV)

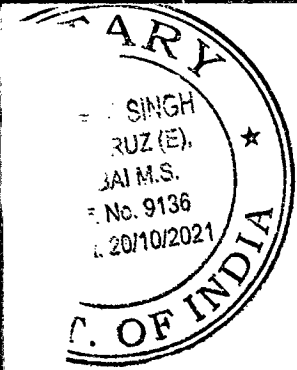
14. MSEDCL submitted its views on draft new Intra-state mechanism Concept paper to MSLDC. MSPC, vide letter dated 13.02.2015 submitted final new ABT mechanism concept paper and the compiled comments of the stakeholders alongwith MSLDC's views to Hon'ble Commission. MSEDCL's views are annexed as Annexure V.
15. MSEDCL's views on draft new Intra-state mechanism Concept paper as forwarded to MSLDC are as follows:
  - I. All RE generators and CPPs above 5 MW alongwith all Distribution Licensees, deemed Licensees all thermal, gas generators, full open access consumers should be made state pool participants.
  - II. Utility's drawl should not be measured at Periphery of utility for scheduling and ABT billing. But it should be measured at its actual TD periphery i.e. energy data as recorded by ABT meters installed at their T-D periphery with MSETCL only, and not even measured as computed drawal as per existing practice adopted by MSLDC in case of MSEDCL.
  - III. MSEDCL disagrees with scheduling of power based on pool loss and MSETCL loss as mentioned in the concept paper. There has to be one loss for consideration of scheduling of power in Maharashtra and that is InSTS loss of Maharashtra.
  - IV. MSEDCL's hydro exclusively Koyna is used by SLDC as a counter measure. As Hydro generations like Koyna are contracted with MSEDCL only, MSLDC should inform MSEDCL regarding operation of Koyna in the event of grid security, line loading, system constraint with the information quantum of power being utilities for State. There should be commercial arrangement between MSEDCL and MSLDC / Mumbai utilities for usage of MSEDCL's hydro in such events i.e. MSEDCL should be compensated for usage of MSEDCL's hydro, exclusively Koyna by MSLDC. Koyna should not be used to meet the demand other than MSEDCL.



- V. For Intra -state UI settlement (other than inter UI) , cap rates for over injection by the seller / generators should be made applicable in line with DSM regulations.
- VI. The State Energy Accounting i.e. SEA shall contain the information and data such as DC, Schedule values of all entities in kWh, energy drawal and injection values of SPPs, backing down units data, partial / full OA consumers drawal data, schedules of all inter and intra-state, PX transactions, deviation values and charges etc on daily/monthly basis.
16. MSEDCL vide letter dated 16.05.2017 has requested Hon'ble Commission to issue directives in the matter of concept paper on new intrastate ABT Mechanism in Maharashtra based on frequency linked deviation settlement mechanism. **(Annexure VI)**
17. Hon'ble Commission, vide its letter dated 15.06.2017, has informed that the Commission has appointed M/s Deloitte for preparation of discussion paper on New Intra State ABT, which is to be floated for seeking comments from stakeholders and same is under active discussion of the Commission. **(Annexure--VII)**
18. But till date, no directives have been issued by Hon'ble Commission in this regards.
19. MSEDCL humbly request Hon'ble Commission to consider the comments of utilities and redress the issues at the earliest.
20. MSEDCL submits that it has raised the issue of revision of deviation settlement mechanism in Maharashtra in 28<sup>th</sup> State Advisory Committee held on 22<sup>nd</sup> January 2017 at Mumbai.

**Least Cost Despatch in FBSM and financial impact on MSEDCL:**

21. MSEDCL submits that as per provision of present mechanism, MSLDC Operation Division (OD) is responsible to prepare Least Cost Despatch Schedule after taking into account the requirement of the State as a whole. It is a way of ranking available generation sources so that those with the lowest variable costs are the



first ones to be brought online to meet demand, and the plants with the highest variable costs are the last to be brought on line. The least cost despatch planning is based on the Merit Order Stack to be adopted by the MSLDC-OD on day-ahead basis based on the available capacity declaration furnished by the generating stations on a day-ahead basis corresponding to each trading period. The MOD stack is prepared considering variable cost of generating unit or station in the state.

The MOD stack for the month of August 2018 is attached as **Annexure-VIII**.

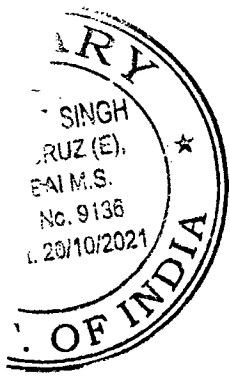
22. MSEDCL submits that at present, due to higher variable costs as compare to MSEDCL's contracted generators, generators contracted with Mumbai utilities appears in the top of the Merit Order Stack as prepared by MSLDC. When the demand in state crashes or when actual demand in state is lower than the generation available, the costliest generation in MOD stack gets backed down first as per MOD principle. Therefore, other generation as available is utilised to meet out state demand including Mumbai utilities. It means cheaper generation from other sources i.e. contracted with other utilities mainly MSEDCL is utilised to fulfil the demand of other utilities mainly Mumbai utilities. Thus, MSEDCL's low cost power is utilised in the system for load generation balance of Mumbai utilities. Thus a part of contracted power of MSEDCL is utilised to meet out the demand of Mumbai utilities in such circumstances.

**Delay in FBSM billing and financial impact on MSEDCL:**

23. MSEDCL submits that as per clause 5.2 of ABT order dtd 17.05.2007 is reproduced as below,

**5.2 Settlement of Regional UI Pool account**

- (a) *The MSLDC shall prepare Weekly 'Statement of Net UI Charge Settlement' corresponding to allocation of Net UI Charges amongst the State Pool Participants for each trading period over the weekly period of each fiscal year under consideration commencing from April in accordance with the regional UI energy account reconciliation rules.*
- (b) *The MSLDC shall present such Weekly 'Statement of Net UI charge Settlement' to MSPC for its records within seven calendar days from the end of the week corresponding to the preceding week.*



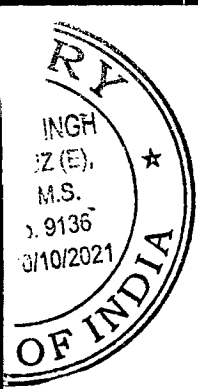
24. It is submitted that as per above provision, MSLDC-EA is responsible to issue FBSM weekly bill within seven days as mentioned above. But at present, weekly FBSM bills upto August 2016 have been issued by MSPC / MSLDC which is almost two years lagging whereas, WRPC, the regional inter-state UI settlement agency, has raised DSM bills upto August 2018. MSEDCL and other distribution utilities have raised this issue in various forums and before Hon'ble Commission on number of occasions. But the same is not being addressed.
25. It is submitted that, due to delay in processing weekly FBSM bills, MSEDCL receives the payment after almost two years which results in financial implications on MSEDCL and affect directly to tariff levied to 1.20 Cr subsidised consumers of MSEDCL.

**Recovery of Annual fixed cost component in respect of MSEDCL for the energy supplied to the State pool:**

26. The Maharashtra State Load Despatch Centre - Commercial Division, prepares weekly Statement of Imbalance Pool Settlement corresponding to energy exchange amongst the State Pool Participants for each trading period over the weekly period of each fiscal year as per the provisions of ABT Order dated 17.05.2007.
27. As per methodology laid down in ABT Order, the Discom which has incremented in the State pool i.e. which has supplied surplus energy to the State pool in a 15-minute time block, gets paid at its weighted average variable cost of the marginal stations. The marginal stations are those stations which are supplying imbalance energy to the contributing State Pool Participants.
28. The annual fixed cost reconciliation for the purpose of settlement of capacity exchanges amongst State Pool Participants shall be carried out as per clause 4.3.2 of ABT Order dated 17.05.2007 as mentioned below:

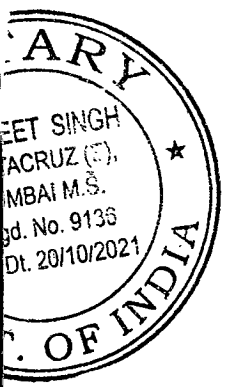
*4.3.2 Annual Fixed Cost Settlement*

- a. For the purposes of settlement of capacity exchanges amongst State Pool Participants, the MSLDC-CD shall work out the Fixed Cost*

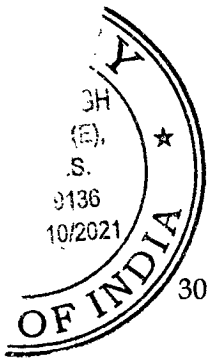


*Reconciliation (FCR) Pool volume comprising 'FCR Pool Increments' and 'FCR Pool Decrements' by each State Pool Participant corresponding to each trading period in accordance with the principles outlined hereunder.*

- b. The computation of 'FCR Pool Increments' and 'FCR Pool Decrements' shall be based on Available Capacity declarations as provided by the Generating Stations. The Generating Stations shall abide by backing down instructions issued by MSLDC on account of system constraints, grid security aspects etc. For the purpose of Fixed Cost Reconciliation, the generating stations shall be deemed to be available upto its declared capacity, even though it may be backed down for the reasons not attributable to such generating station. Further, it is clarified that during real-time operations if required, SLDC may seek to verify available capacity of the generating station upto 'declared capacity' and issue despatch instructions accordingly.*
- c. 'FCR Pool volume' shall be based on excess or shortfall in 'loss adjusted drawal' by State Pool Participant corresponding to a particular trading period vis-à-vis 'overall generation capacity' declared to be available to State Pool Participant based on 'forecasted availability' furnished by the generators contracted by the concerned State Pool Participant.*
- d. The excess in 'loss adjusted drawal' shall be termed 'decrements' to 'FCR Pool volume' whereas 'shortfall' in 'loss adjusted drawal' shall be termed as 'increments' to 'FCR Pool volume'. Such 'FCR Pool Increments' and 'FCR Pool decrements' shall be tracked for each trading period over the annual settlement period.*
- e. 'FCR Pool Reconciliation' shall take place on annual basis, taking into consideration the aggregate of 12-monthly 'FCR Pools' for each trading period.*
- f. The 'Rate Basis' for determination of FCR pool price for settlement shall be 'overall average per unit fixed cost' of the contributing Pool Participant into 'FCR Pool'.*



- g. FCR Pool value shall be determined as aggregate of product of 'overall average per unit fixed cost' of the contributing FCR Pool Participant and the 'FCR Pool increments' by the contributing FCR Pool Participant into the FCR pool.
- h. For the purpose of determining 'overall average per unit fixed cost' of contributing Pool participant, total fixed cost payable by the Pool Participant for the generating stations contracted by that FCR Pool Participant during the fiscal year under consideration shall be divided by 'total energy units' injected by generating station and to be paid for such FCR Pool Participant during the fiscal year, in accordance with the PPA conditions shall be considered.
- i. FCR Pool Price to be paid by the FCR Pool Participants decrementing to 'FCR Pool' shall be determined as ratio of 'FCR Pool Value' to 'FCR Pool volume'.
- j. Based on 'FCR Pool Increments' and 'FCR Pool Decrements' and the 'FCR Pool Price' (to be determined in accordance with the principles outlined above), the 'FCR Pool Amount Payable' and 'FCR Pool Amount Receivable' in respect of each State Pool Participant corresponding to each trading period shall be determined.
- k. The aggregate of 'FCR Pool Amount Payable' and 'FCR Pool Amount Receivable' corresponding to each trading period over the period of one fiscal year in respect of each State Pool Participant shall form the basis for 'Net FCR Pool Amount Payable' or 'Net FCR Pool Amount Receivable' by the respective State Pool Participant for that fiscal year.
- l. For the purposes of the annual fixed cost settlement amongst the State Pool Participants, the 'annual period' shall be referred to as the 'fiscal year'.
29. MSEDCL submits that as per clause (b) of para 4.3.2 of ABT Order dated 17.05.2017 as mentioned above, the computation of 'FCR Pool Increments' and 'FCR Pool Decrements' shall be based on **Available Capacity declarations** as



provided by the Generating stations. But MSLDC-Commercial Division has not maintained the data of the declared capacity in respect of generating stations as required for computations of annual fixed cost settlement.

30. Hon'ble Commission in its Order dtd 11.04.2014 in Case NO 56 of 2012 have not provided the methodology for calculation of fixed cost reconciliation for the existing centralised FBSM mechanism

31. As per clause 3.116 regarding calculations of Fixed Cost Reconciliation (FCR) Pool,

*"..... It is of the view that if the frequency linked balancing and settlement mechanism is adopted, the issue regarding the inclusion of STOA generators in the FCR Pool would not arise and such a problem would get resolved. As the Commission does not intend to amend the existing FBSM system, it analysed the issue for the impact on the frequency linked balancing and settlement mechanism. It observed that the issue related to FCR becomes redundant when the frequency linked balancing and settlement mechanism is being envisaged to be implemented. "*

32. In view of this, MSEDCL submits that fixed cost reconciliation pool may not be necessary in de-centralised frequency linked balancing and settlement mechanism but this issue needs to be addressed in existing centralised FBSM mechanism.

33. MSEDCL has raised the issue of annual Fixed Cost Reconciliation (FCR) Pool in 21<sup>st</sup> and 22<sup>nd</sup> MSPC meetings held on 06.01.2016 and 08.02.2017 respectively also. The minutes of RoP of 21<sup>st</sup> and 22<sup>nd</sup> MSPC meeting regarding the issue of annual fixed cost reconciliation (FCR) are as follows.

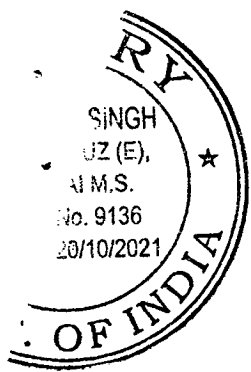
34. As per para 10 of RoP of 21<sup>st</sup> MSPC meeting held on 06.01.2016 at Mumbai,

**10. Fixed Cost Reconciliation (FCR)-**

*As MSPC is aware of, MSLDC had filed a petition before Hon MERC for removal of difficulties in FBSM, vide Case 56 of 2012. Difficulty in FCR was one of the issues raised in the petition. In order to address the difficulties referred by MSLDC, the Commission has directed to implement frequency based ABT mechanism vide MERC order dated 11.04.2014.*

*In view of the same it is to clarify that in the present framework of FBSM, it is not possible to carry out FCR. Committee has suggested that such complicated technical*





decisions are to be made through detailed analysis in Sub-Committee. Committee further advised that Sub-Committee should submit final recommendations on the issue.

As per para 6 of RoP of 22<sup>nd</sup> MSPC meeting held on 08.02.2017 at Mumbai,

**6. Fixed Cost Reconciliation(FCR)-**

The background of FCR module envisaged in ABT order in case no.42 dated 17.05.2007 was discussed with difficulties/clarification needed in ABT mechanism.

All members unanimously agreed that in the present framework of FBSM, it is not possible to carry out FCR and Hon.Chairman MSPC instructed not to raise the FCR issue in any of the next MSPC meetings till any directives came from Hon'ble MERC on this regard.

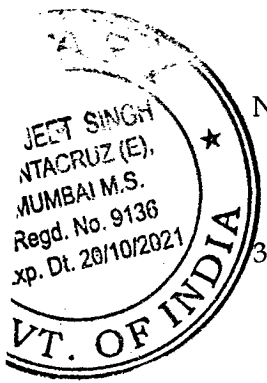
The RoP of 21<sup>st</sup> and 22<sup>nd</sup> MSPC meetings are annexed as Annexure IX and X.

35. MSEDCL submits that so far no methodology has been worked out for annual fixed cost reconciliation. Due to this, MSEDCL is deprived off from getting its fixed part component of energy supplied to the state pool.

36. In absence of annual fixed cost reconciliation, MSEDCL has worked out the approximate provisional amount to be recovered from the State pool towards fixed cost component based on average fixed charge per unit as paid by MSEDCL for FY 2011-12 to FY 2017-18 for the net imbalance units in respect of MSEDCL as follows:

Table 1: Details of Mus and amount to be recovered toward fixed cost in r/o MSEDCL for FY 2011-12 to FY 2017-18 :

FY	Net Imbalance Units in Mus	MSEDCL's Average fixed cost rate/Kwh, Rs.	Amount, Rs. Cr.	Interest component Rs. Cr.	Total estimated amount Rs Cr
2011-12	-596.30	0.67	-39.95	-41.35	-81.30
2012-13	209.58	0.77	16.14	12.96	29.10
2013-14	1082.34	0.89	96.33	56.65	152.98
2014-15	1508.96	1.09	164.48	64.51	228.98
2015-16	2512.41	1.16	291.44	64.05	355.49
2016-17*	1393.00	1.37	190.84	22.25	213.09
2017-18*	1359.00	1.69	229.67	0.00	229.67
Total	7468.99		948.94	179.08	1128.02



Note : (+)ve units indicates underdrawl units and (-) ve units indicate overdrawl units  
\* Units based on DSR data of MSLDC as provisional FBSM bills upto August 2016 are issued

37. In view of above, Hon'ble Commission is humbly requested to direct MSLDC to immediately initiate and enable MSEDCL to recover estimated amount of Rs. 948.94 Cr alongwith carrying cost upto March 2018 Rs. 179.08 Cr as worked out for FY 2011-12 to FY 2017-18 through existing Final Balancing & Settlement Mechanism. The calculation regarding interest calculation is annexed as **Annexure-XI**.

**Limitations of existing Final Balancing & Settlement Mechanism (FBSM) and overdrawl of Mumbai utilities:**

38. MSEDCL submits that it is noticed after analysis of monthly DSR data of September 2017 to March 2018, Mumbai utilities have overdrawn the power from the state pool when the energy rates at power exchange were very high. During this period, to control overdrawl from the central grid and for Load Generation Balance of the State, Koyna generation, which is exclusively contracted with MSEDCL, was picked up by MSLDC.
39. As per present FBSM settlement provision for the overdrawl utilities needs to pay weighted average system marginal price which mainly consists of variable component of long term intra-State generators of incrementing utilities. Thus, Mumbai utilities during the above mentioned period has taken the undue benefit of provisions under FBSM and exploiting the FBSM mechanism when during this period the power on exchanges was very costly. MSLDC, being system operator and Regulator, is not playing its role judiciously and MSEDCL is affecting badly as its contracted Koyna generation is picked up for State load generation balancing (LGB) to restrict overdraw from the central grid.

The details in respect of Mumbai UI , as observed based on daily system report for period 1<sup>st</sup> September 2017 to 11<sup>th</sup> September 2017, is attached h/w as **Annexure XII**. Also the details of average market rate for period Sep,17 to May'18 are attached h/w as **Annexure-XIII**. The details in respect of Mumbai UI , as observed



based on daily system report for period 1<sup>st</sup> September 2017 to 31<sup>st</sup> May 2018, is attached h/w as **Annexure XIV**.

40. MSEDCL has informed MSLDC several times not to pick up Koyna generation for State LGB and pick up hydro contracted with Mumbai utilities but no reciprocated action from MSLDC. The notices issued by MSEDCL are attached h/w as **Annexure XV**.

41. MSEDCL humbly submit that the necessary instruction to be issued to MSLDC for not allowing Mumbai utilities to exploit the situation as stated above.

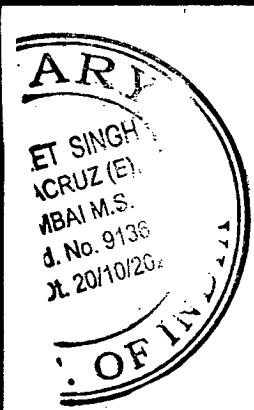
**Non consideration of exchange power rates/ partial consideration of bilateral power, in calculation of WASMP and financial burden:**

42. MSEDCL submits that for calculation of weighted average SMP of underdrawing utility, only energy above 70 % contracted quantum of short term bilateral power is considered. Also, the rate of power purchased in the power exchange, CPPs are not considered. This results in financial implications on the utility like MSEDCL which is supplying power to the pool especially when MSEDCL has purchased costly power from exchange and other such sources.

43. This unnecessarily results in financial implications on MSEDCL and affect directly to tariff levied to 1.20 Cr subsidized consumers of MSEDCL.

44. MSEDCL submits that the WASMP of the underdrawing utility does not reflect actual variable energy rate of power purchased by that utility. Therefore, MSEDCL gets paid for its underdrawl at the net rate which is much lower than its average variable cost due to the guidelines as laid down in the existing mechanism. Thus MSEDCL is not compensated fully for the energy supplied to the pool. The difference as observed for FY 2011-12 to FY 2017-18 is as shown below:

Table 2. Differential amount to be recovered towards variable rates in r/o  
MSEDCL for FY 2011-12 to FY 2017-18 alongwith carrying cost :



FY	Net Imbalance Units in Mus	Estimated amount to be recovered, Rs Cr.	Interest component	Total estimated amount , Rs Cr
2011-12	-596.303	25.27	26.15	51.42
2012-13	209.576	66.09	53.09	119.17
2013-14	1082.342	256.46	153.91	410.38
2014-15	1508.965	519.76	203.84	723.60
2015-16	2512.408	606.64	133.33	739.97
2016-17*	1393.000	529.34	61.72	591.06
2017-18*	1359.000	464.78	0.00	464.78
Total	7468.987	2468.33	632.05	3100.38

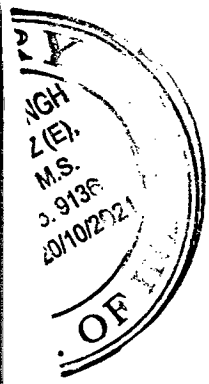
Note : (+)ve units indicates underdrawl units and (-) ve units indicate overdrawl units

\* based on DSR data of MSLDC as provisional FBSM bills upto August 2016 are issued

In view of above, MSEDCL submits that an estimated amount of Rs. 2468.33 Cr alongwith carrying cost upto March 2018 of Rs. 632.305 Cr is recoverable to MSEDCL for FY 2011-12 to FY 2017-18 due to difference between actual average variable cost of power purchase by MSEDCL and net rate receivable by MSEDCL in FBSM bills. The detailed calculation sheets are annexed as **Annexure-XVI**.

#### Monthly State Energy Account (SEA) Report:

45. MSEDCL humbly submits that MSLDC used to prepare monthly state energy account i.e. Interim Balance Settlement Mechanism report (IBSM) prior to August 2011 wherein purchase and drawal of all utilities viz. MSEDCL, TPC-D, RInfra-D and BEST were accounted. This used to cover all generation including State owned generation, IPP's generation, RE generation and also power purchase from central sector and interstate bilateral transaction from the concerned utilities. After implementation of Final Balance Settlement Mechanism i.e. FBSM, MSLDC has not prepared monthly state energy account.
46. MSEDCL humbly submits that there is difference observed in MSEDCL's purchase as shown against metered injection and intra-OA purchase in respect of MSEDCL's purchase in 15-minute FBSM bill and 15-minute FBSM report issued by MSLDC. This issue is yet to be resolved by MSLDC. The discrepancy as pointed out by MSEDCL to MSLDC for weekly FBSM bill for period 27.06.2016 to



03.07.2016 is annexed. In view of this, MSLDC should issue FBSM bill which is in line with FBSM report prepared by them for the subject period. (Annexure-XVII)

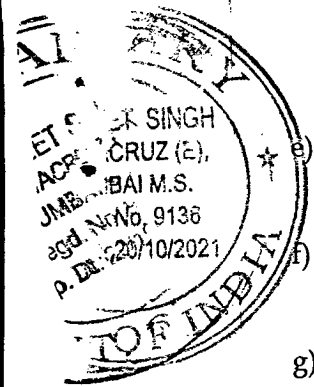
46. MSEDCL, through various letters, has requested SLDC to prepare monthly state energy account report, in line with the IBSM report / monthly REA as prepared by WRPC for energy transacted in Western region, from month of August 2011 which will cover declared capacity, scheduled / actual injected / backdown units in respect of all generation in the state including RE generation and OA consumers. However, despite repetitive requests, such monthly state energy account report is not prepared by SLDC till date. MSEDCL has raised this issue of monthly state energy account for the monthly FBSM bills issued in several MSPC meetings also. **Annexure-XVIII.**

47. MSEDCL humbly submits that MSLDC being nodal agency should prepare monthly state energy account report for energy transacted in Maharashtra in line with monthly REA as prepared by WRPC for energy transacted in Western region.
48. This petition is being submitted by Maharashtra State Electricity Distribution Company Limited under provisions of Power to remove difficulties under Regulation 96 and 94 of Maharashtra Electricity Regulatory Commission (Conduct of Business) Regulations, 2004 .

49. Prayers:

The Petitioner therefore, based on the submissions made in the foregoing paragraphs, most respectfully prays to the Hon'ble Commission:

- a) To admit the Petition as per the provisions of Electricity Act 2003 and Regulation mentioned in the petition.
- b) To issue directives regarding implementation of de-centralized scheduling and frequency linked deviation settlement mechanism
- c) To allow the recovery of estimated amount of Rs. 948.94 Cr towards fixed cost component for the net imbalance units supplied by MSEDCL to the state imbalance pool alongwith the carrying cost upto March 2018 Rs.179.08 Cr as mentioned in para 37 and an estimated amount of Rs. 2468.33 Cr towards compensation of variable charges alongwith carrying cost upto March 2018 Rs. 632.05 Cr as shown in para 44, thus to allow the recovery of total estimated amount of Rs. 4228.40 Cr
- d) To direct MSLDC to prepare monthly State Energy Account report.



- e) To direct MSLDC not to, pick up Koyna generation for state LGB and allow Mumbai utilities to exploit the existing FBSM mechanism
- f) To pass any other order/relief as the Hon'ble Commission may deem fit and appropriate under the circumstances of the case and in the interest of justice;
- g) To condone any error/omission and to give opportunity to rectify the same;

Chief Engineer (Power Purchase)

MSEDCL

**AFFIDAVIT ON BEHALF OF PETITIONER (MSEDCL) VERIFYING THE  
ADDITIONAL SUBMISSION**

I, PARESH RAMCHANDRA BHAGWAT, aged 46 Years, son of Shri. RAMCHANDRA BHAGWAT, having my office at 5th Floor, Prakashgad, Bandra (East), Mumbai-400051 do solemnly affirm and say as follows:

1. I am the Chief Engineer (Power Purchase) of Maharashtra State Electricity Distribution Co. Ltd., the Review Petitioner in the above matter and am duly authorized competent to make this affidavit.
2. The statements made in paragraphs of the additional submission are true to my knowledge and belief and statements made in paragraphs one to three are based on information and I believe them to be true.
3. I say that there are no proceedings pending in any court of law/ tribunal or arbitrator or any other authority, wherein the Petitioner is a party and where issues arising and/or reliefs sought are identical or similar to the issues arising in the matter pending before the Commission.

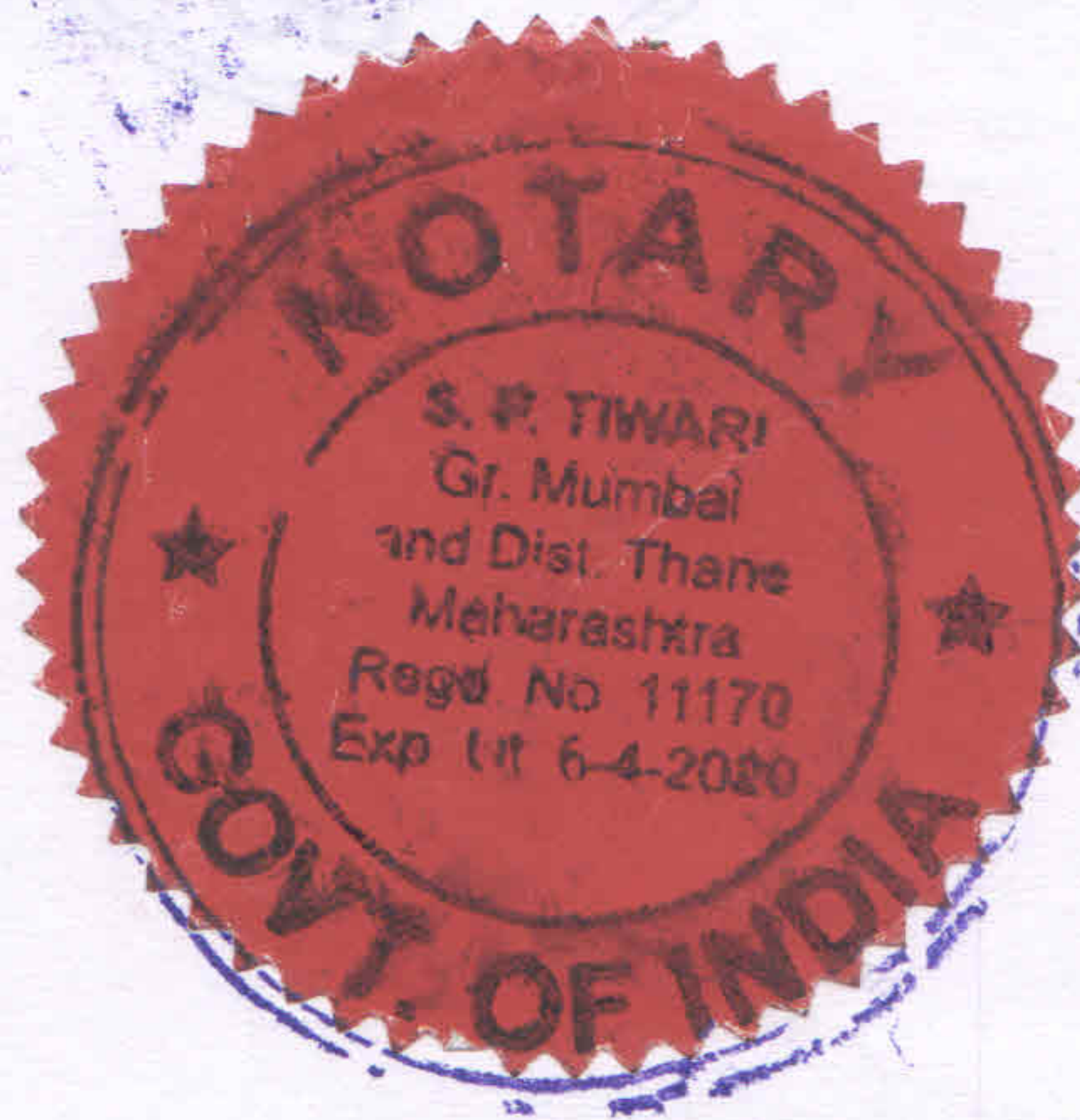
Solemnly affirm at Mumbai on this 20<sup>th</sup> day of December-2018 that the contents of the above affidavit are true to my knowledge, no part of it is false and nothing material has been concealed there from.



Identified before me

Mumbai

Date-

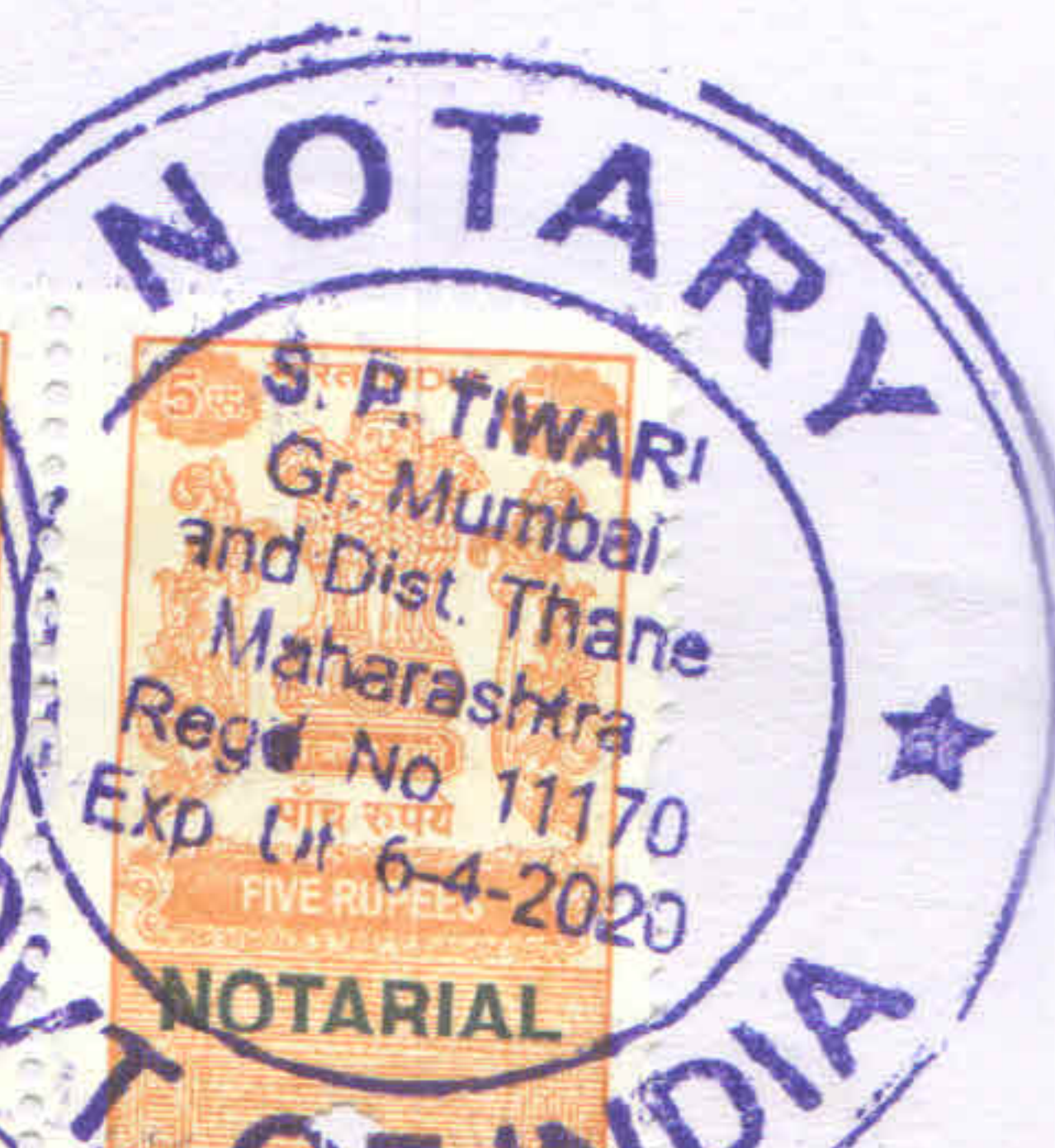
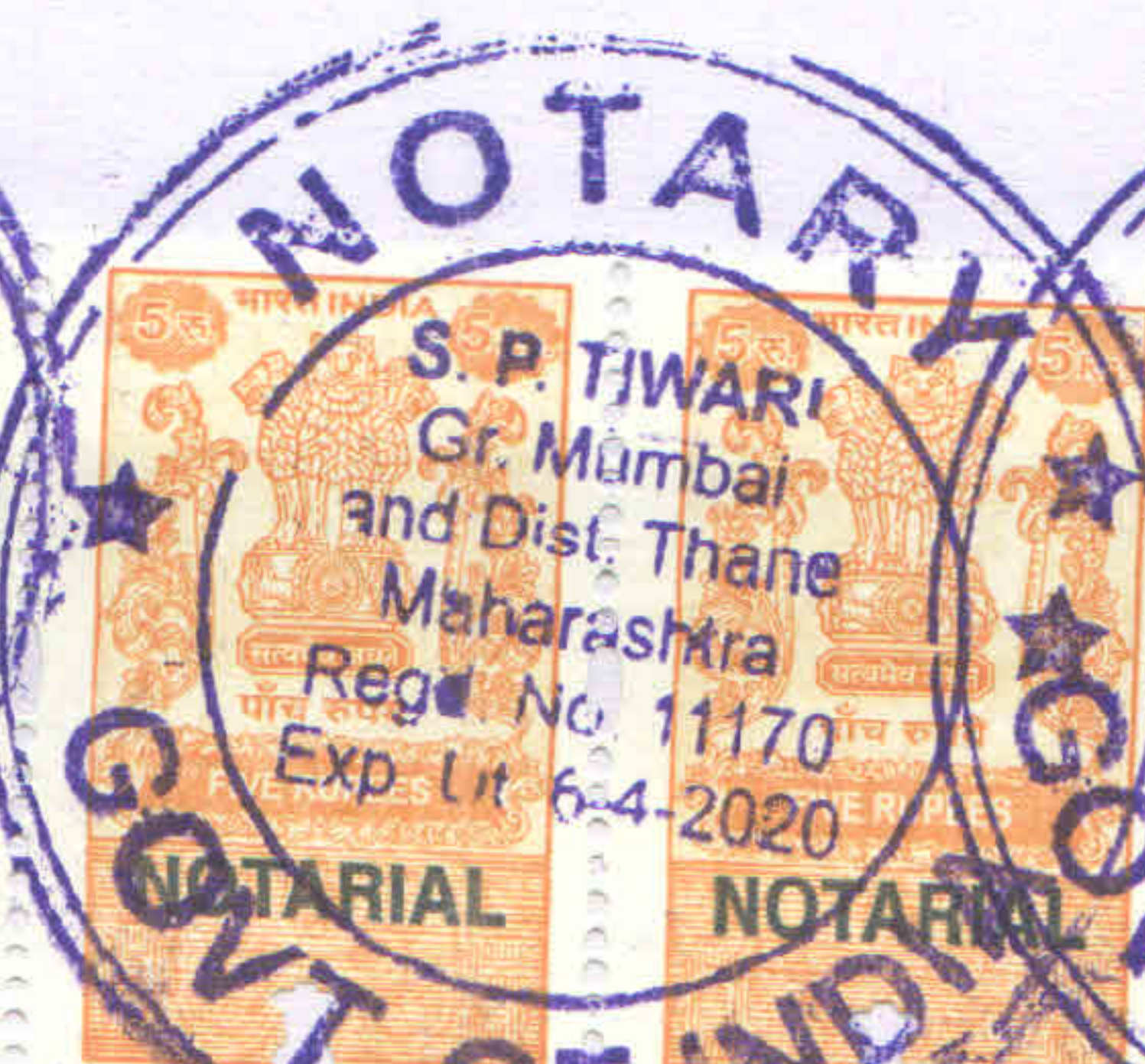
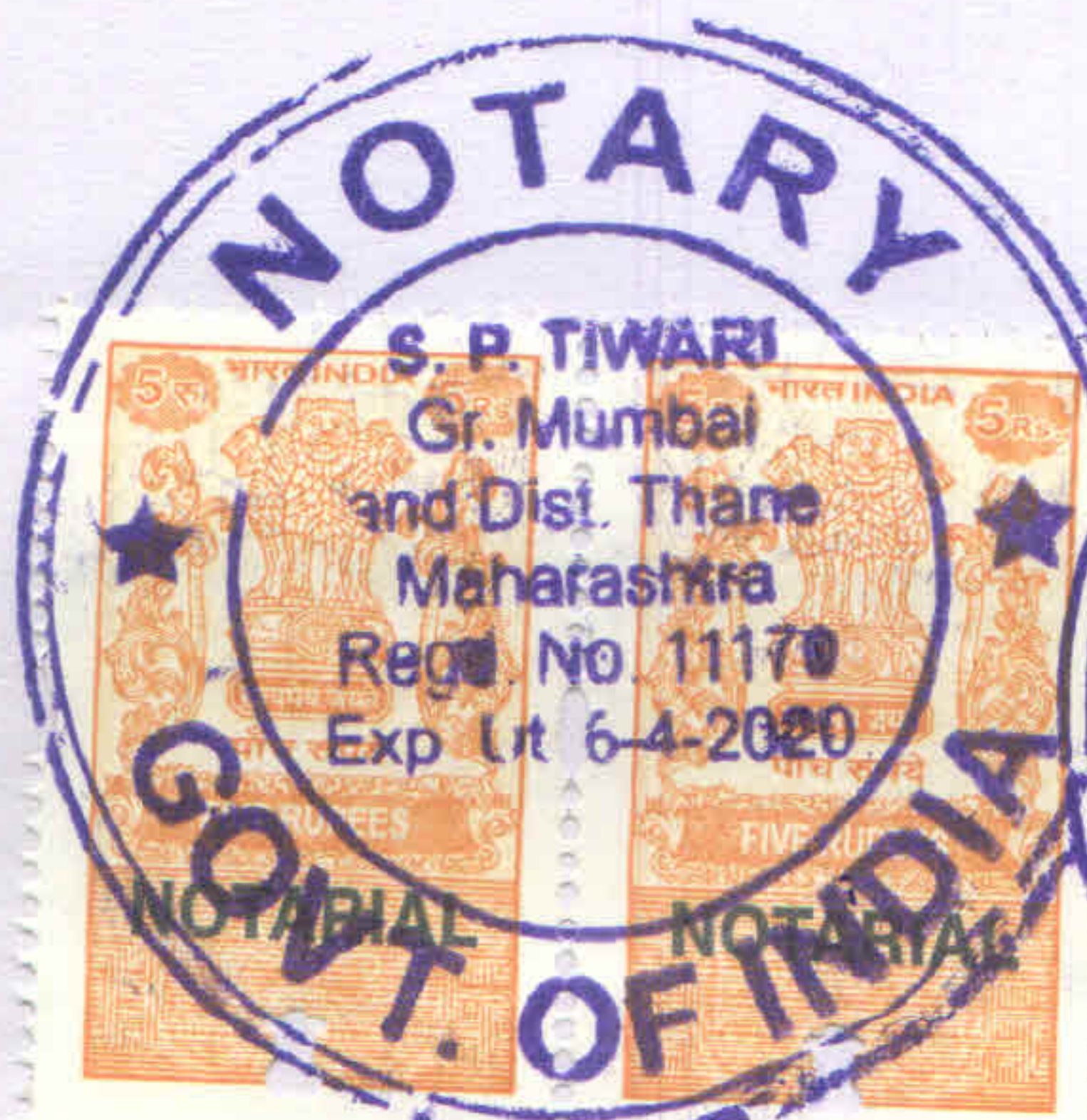


Deponent

**Chief Engineer (Power Purchase Section)  
MSEDCL  
Prakashgad, 5th Floor,  
Prof. Anant Kanekar Marg,  
Bandra (East), Mumbai - 400 051.**

**BEFORE ME**

**S. P. TIWARI  
M.A., LL.B  
NOTARY  
Maharashtra  
(Govt of India)  
20 DEC 2018**





**BEFORE THE HON'BLE MAHARASHTRA ELECTRICITY  
REGULATORY COMMISSION, MUMBAI**

Filing No

Case No. 297 of 2018

**IN THE MATTER OF**

Petition seeking recovery of annual fixed cost component in respect of MSEDCL for the energy supplied to the State pool, recovery of differential amount to be recovered towards variable rate, removal of anomalies and directions in regards to overdrawl by Mumbai utilities in Balancing and Settlement Mechanism as per provision of ABT Order dated 17.05.2007 in Case No 42 of 2006 in the matter of introduction of Availability Based Tariff Regime at State level within Maharashtra and other related issues.

**AND**

**IN THE MATTER OF**

Regulation 94 and 96 of MERC (Conduct of Business) Regulations, 2004

**IN THE MATTER OF:**

Maharashtra State Electricity Distribution Company Limited  
5th Floor, Prakashgad,  
Plot No. G-9, Bandra (East),  
Mumbai – 400051

**... PETITIONER**

**VERSUS**

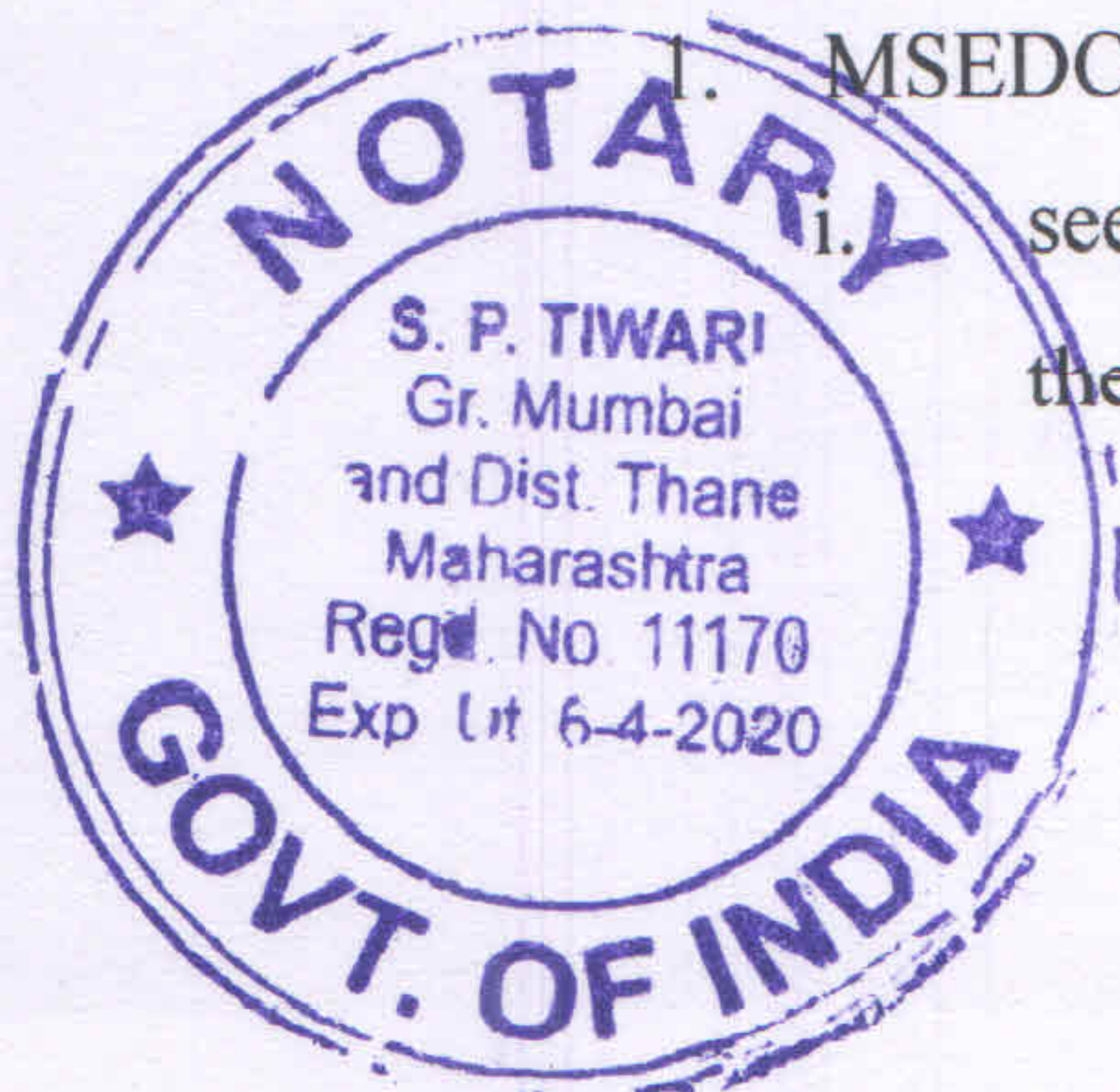
Maharashtra State Load Despatch Centre,  
Thane-Belapur Road, P.O. Airoli,  
Navi Mumbai – 400 708

**... RESPONDENT**

**Additional Submission on behalf of Petitioner- MSEDCL**

MSEDCL most humbly submits as under;

1. MSEDCL vide its letter dated 16.10.2018 has filed a petition for,  
i. seeking recovery of annual fixed cost component in respect of MSEDCL for the energy supplied to the State pool along with carrying cost,







- ii. seeking recovery of differential amount to be recovered towards variable rate alongwith carrying cost,
- iii. removal of anomalies and
- iv. directions in regards to overdrawl by Mumbai utilities,

in Final Balancing and Settlement Mechanism as per provision of ABT Order dated 17.05.2007 in Case No 42 of 2006 in the matter of introduction of Availability Based Tariff Regime at State level within Maharashtra.

2. MSEDCL humbly submits that in the present Petition, MSEDCL has submitted data of estimated amount to be recovered towards fixed cost in r/o MSEDCL for FY 2011-12 to FY 2017-18 and differential amount to be recovered due to difference in highest variable rate of LTPP/ STOA/ Exchange purchase and net FBSM pool rate in r/o MSEDCL as per Annexure XVI and Annexure XI respectively.
3. It is submitted that inadvertently some figures provided in the said Annexure XI, Annexure XVI(A) and Annexure XVI(B) are provided by mistakes / oversight i.e. the figures of FY 2011-12, FY 2012-13 and FY 2013-14 are changed. It is therefore necessary to correct / modify the figures of the said Annexure XI, Annexure XVI(A) and Annexure XVI(B) are now considered based on imbalance units available for period from April 2016 to December 2016 and balance are as per DSR data.
4. MSEDCL submits that in the present additional submissions, earlier considered imbalance units for period FY 2016-17 and FY 2017-18 which were based on DSR data (1393 MUs) are replaced by the imbalance units for period April 2016 to December 2016 as per provisional FBSM bills issued by SLDC and for period January 2017 to March 2018 are based on DSR data.
5. MSEDCL humbly submits that due to change in imbalance units, the revised differential amount to be recovered towards fixed cost in r/o MSEDCL for FY 2011-12 to FY 2017-18 alongwith carrying cost is as shown below in Table 1.



**Table 1: Details of Mus and amount to be recovered toward fixed cost in r/o MSEDCL for FY 2011-12 to FY 2017-18 :**

FY	Net Imbalance Units in Mus	MSEDCL's Average fixed cost rate/Kwh, Rs.	Amount, Rs. Cr.	Interest component	Total amount, Rs Cr
2011-12	-559.53	0.67	-37.49	-38.80	-76.29
2012-13	-23.01	0.77	-1.77	-1.42	-3.19
2013-14	1237.12	0.89	110.10	64.76	174.86
2014-15	1508.34	1.09	164.41	64.48	228.89
2015-16	2512.41	1.16	291.44	64.05	355.49
2016-17#	1848.81	1.37	253.29	29.53	282.82
2017-18*	1359.00	1.69	229.67	0.00	229.67
Total	7883.14		1009.65	182.60	1192.25

Note : (+)ve units indicates underdrawl units and (-) ve units indicate overdrawl units

\* Units based on DSR data of MSLDC as provisional FBSM bills upto December 2016 are issued and # Imbalance units upto December 2016 are considered based on FBSM bills issued by SLDC and units for Jan 2017 to Mar 2018 are based on DSR report

6. In view of above, Hon'ble Commission is humbly requested to direct MSLDC to immediately initiate and enable MSEDCL to recover estimated amount of Rs. 1009.65 Cr alongwith carrying cost of Rs. 182.60 Cr upto March 2018 as worked out for FY 2011-12 to FY 2017-18 through existing Final Balancing & Settlement Mechanism. The calculation regarding interest calculation is annexed as Revised Annexure-XI.
7. MSEDCL also humbly submits that the revised differential amount to be recovered towards variable rates in r/o MSEDCL for FY 2011-12 to FY 2017-18 alongwith carrying cost due to change in imbalance units and amount received by MSEDCL for period from April 2016 to December 2016 from FBSM bills is corrected as shown below in Table 2.

**Table 2.** Revised Differential amount to be recovered towards variable rates in r/o MSEDCL for FY 2011-12 to FY 2017-18 alongwith carrying cost:

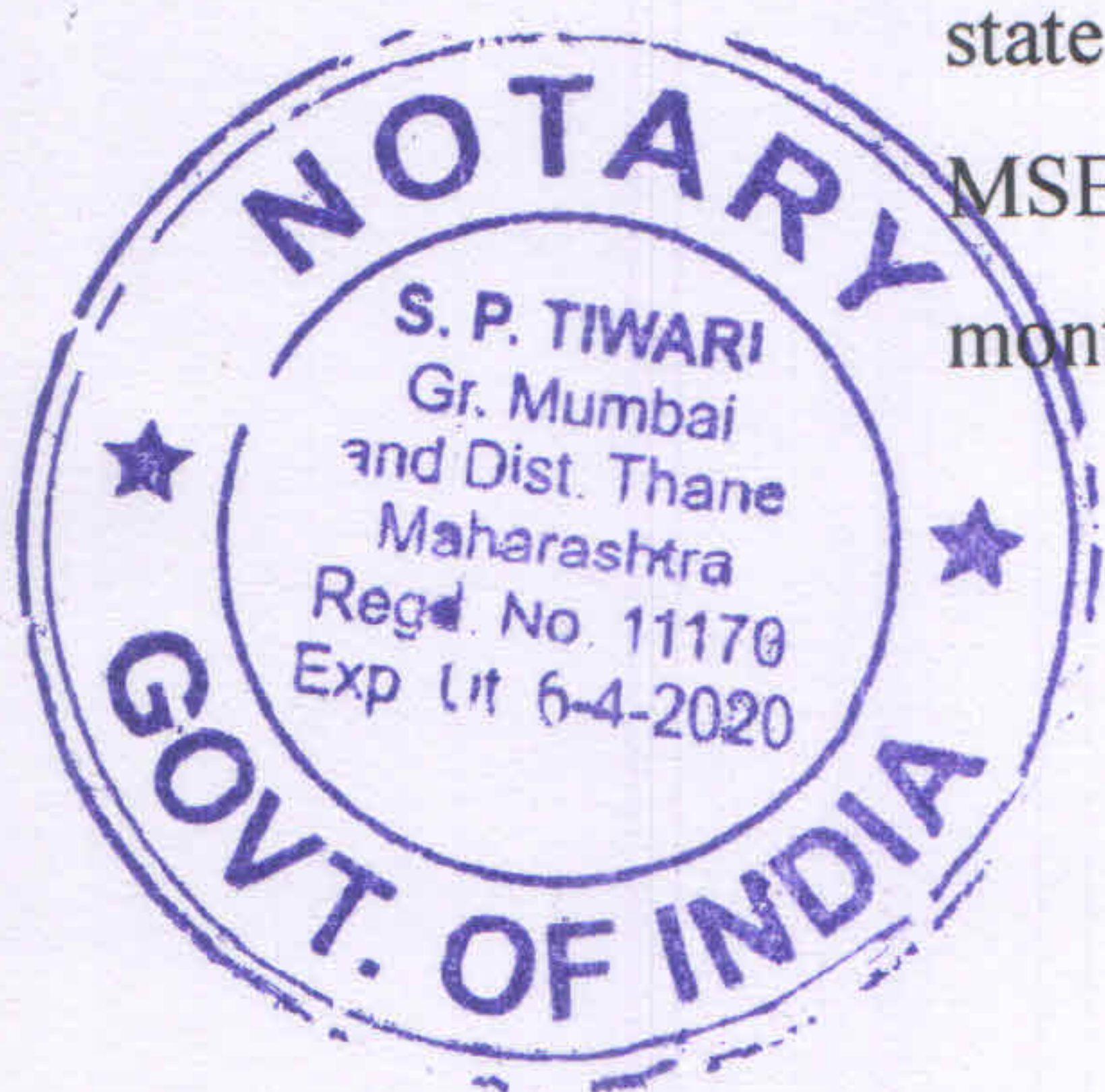
FY	Net Imbalance Units in Mus	Estimated amount to be recovered, Rs Cr.	Interest component	Total amount, Rs Cr
2011-12	-559.535	25.27	26.15	51.42
2012-13	-23.009	78.19	62.80	140.99
2013-14	1237.124	298.71	179.27	477.98
2014-15	1508.336	525.59	206.13	731.71
2015-16	2512.408	606.64	133.33	739.97
2016-17#	1848.811	374.73	43.69	418.43
2017-18*	1359.000	464.78	0.00	464.78
Total	7883.135	2373.90	651.38	3025.27

Note : (+)ve units indicates underdrawl units and (-) ve units indicate overdrawl units  
 \* based on DSR data of MSLDC , (#) imbalance units upto December 2016 are considered from prov. FBSM bills and units from Jan 2017 to Mar 2018 are based on DSR data

8. In view of above, MSEDCL submits that the revised estimated amount of Rs. 2373.90 Cr alongwith carrying cost upto March 2018 of Rs. 651.38 Cr is recoverable to MSEDCL for FY 2011-12 to FY 2017-18 due to difference between actual average variable cost of power purchase by MSEDCL and net rate receivable by MSEDCL in FBSM bills. The detailed calculation sheets are annexed as Revised Annexure-XVI.
9. MSEDCL humbly submits that as per present FBSM mechanism, the deviations of instate generators are to be borne by the contracting Discoms. As thus generators are not part of this mechanism, there is no discipline to the generators regarding scheduling and controlling the generation in real time, This has resulted into undue burden and financial impact on Discom and thereby on the consumers. Hence, MSEDCL humbly request Hon'ble Commission to implement new intra-state DSM Regulation at the earliest

**Latest Developments:**

10. MSEDCL submits that majorly MSEDCL's contracted power is being utilised by state Discom/ utilities in Maharashtra under FBSM settlement. As per PPA terms, MSEDCL has to make payment to its contracted generators within 30 days for the monthly energy bills as raised by them. However, the present FBSM billing is



lagging by almost two years and this is causing huge financial loss to MSEDCL. In view of above, MSEDCL has calculated the provisional estimated amount to be recovered from Mumbai utilities for FY 2016-17 and FY 2017-18 as shown in table No. 4 below:

**Table No.4:**

Particulars		Rinfra-D (AEML)	TPC	BEST
<b>Fixed cost recovery:</b>				
FBSM Units as per MTR for FY 2016-17, Mus	A	808	371	280
Fixed charges payable@Rs.1.37 per unit, Rs Cr	B	111	51	38
FBSM Units as per MTR for FY 2017-18, Mus	C	861	438	568
Fixed charges payable@Rs.1.69 per unit, Rs Cr	D	146	74	96
<b>Variable cost recovery:</b>				
Unsettled# FBSM Units for FY 2016-17Mus	E	256	87	280
Variable charges payable @Rs 3.80 per unit for FY 2016-17, Rs Cr	F	97	33	11
FBSM Units as per MTR units for FY 2017-18, MUs	G	861	438	568
Variable charges payable @Rs 3.42per unit for FY 2016-18, Rs Cr	H	295	150	194
<b>Total amount payable to MSEDCL, Rs Cr.</b>	<b>B+D+F+H</b>	<b>649</b>	<b>308</b>	<b>339</b>

Note: #For FY 2016-17, MSLDC has settled units till 30<sup>th</sup> October 2016

11. In this regards, MSEDCL, vide its letter dated 12.11.2018 has requested the Chief Engineer, Maharashtra State Load Despatch Centre for provisional recovery of FBSM bills from Mumbai utilities as shown in Table no.4 above totalling to Rs 1296 Cr and transfer same to MSEDCL till the finalisation of FBSM bills.
12. However,from the Orders dated 12.09.2018 in the matter of mid-term review of truing up of ARR for FY 2016-17 and provisional truing up of ARR for FY 2017-18 petition Mumbai utilities vide case no 200 of 2017,69 of 2018 and 203 of 2017 of the AEML (erstwhile RInfra-D), TPC-D and BESTrespectively It is observed that Hon'ble Commission has approved the power purchasefrom imbalance poolfor Mumbai utilities as shown in Table 3 below:

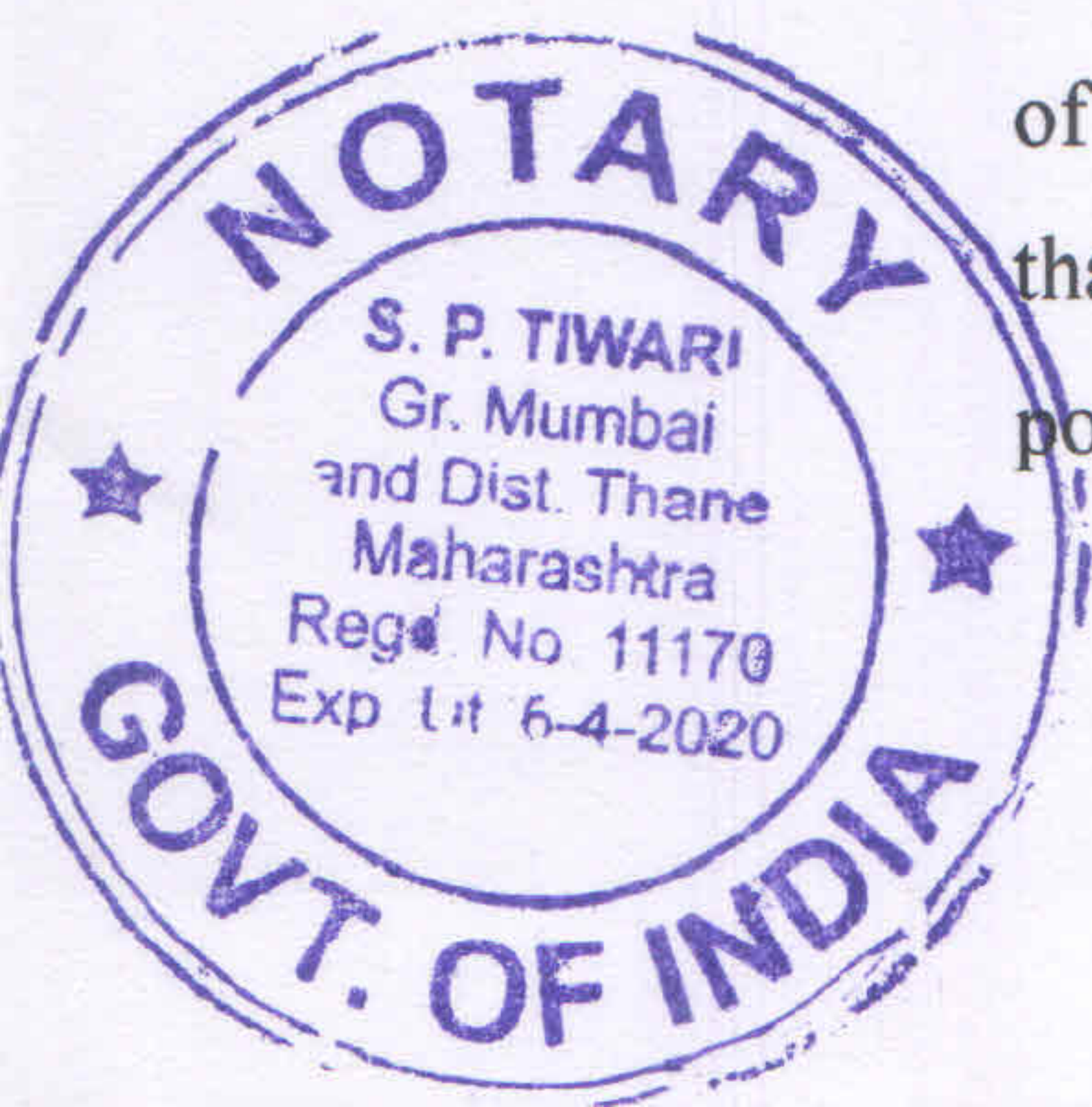
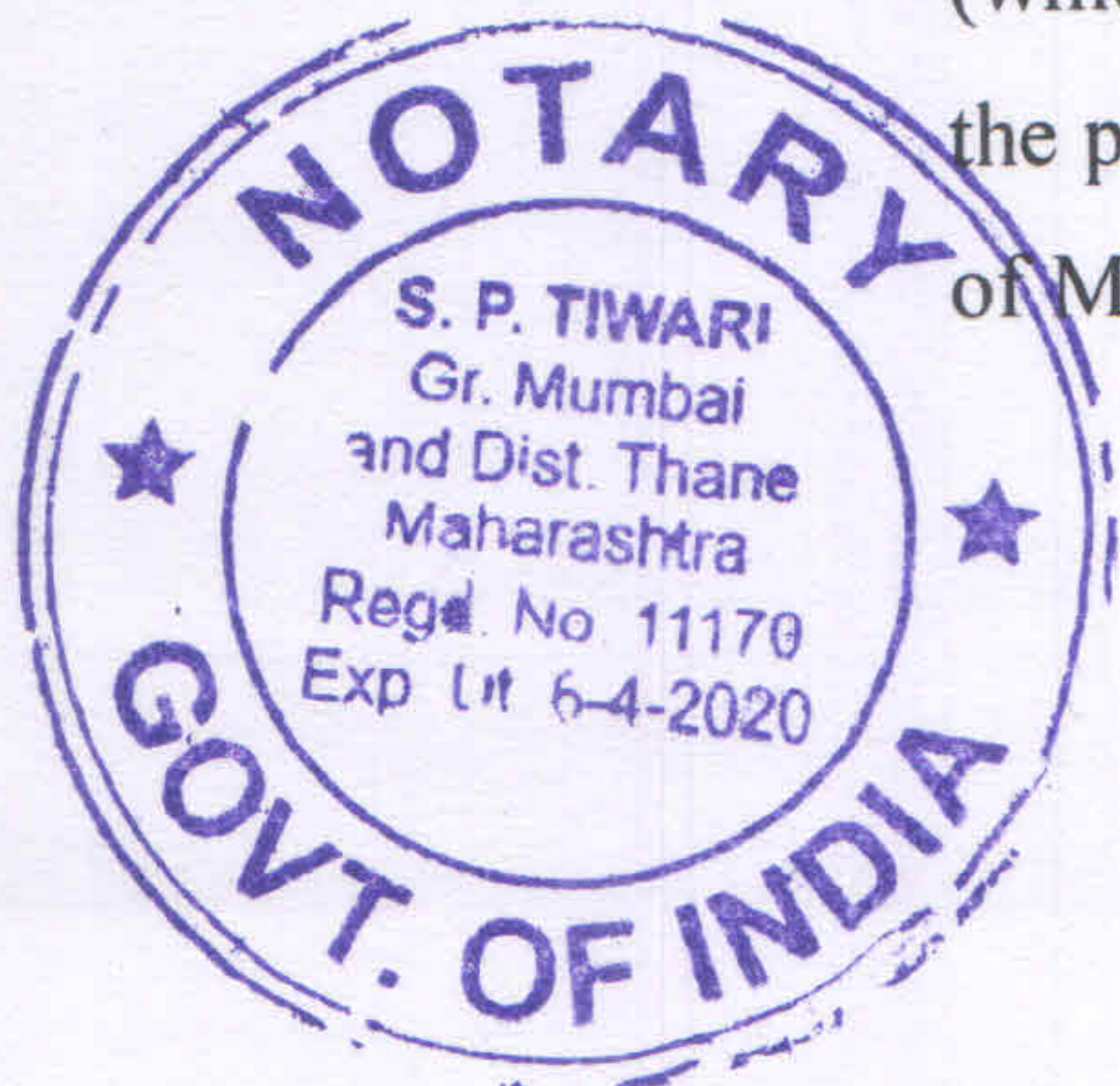


Table No.3:

Utility	MTR Order No	FY 2016-17			FY 2017-18		
		Quantum (MU)	Cost (Rs. Crore)	Rate (Rs./Kwh)	Quantum (MU)	Cost (Rs. Crore)	Rate (Rs./Kwh)
<b>RInfra-D</b>	200 of 2017	807.96	257.99	3.19	861.88	302.66	3.51
<b>TPC-D</b>	69 of 2018	370.77	109.5	2.95	437.98	125.24	2.86
<b>BEST</b>	203 of 2017	280.28	6.05	0.22	567.88	187.97	3.31

Copies of the relevant pages of MTR Orders of Mumbai utilities viz. AEML (erstwhile RInfra-D), TPC-D and BEST are annexed as Annexure A, B and C respectively.

13. MSEDCL submits that Mumbai utilities viz. AEML (erstwhile RInfra-D), TPC-D and BEST have already recovered the cost as shown in Table No.3 totalling to Rs. 989.41 Cr from its consumers through tariff and hence are liable to pay the same to FBSM pool account for energy drawn from the state pool under FBSM mechanism.
14. Further, the issue of provisional recovery of FBSM bills from Mumbai utilities for period FY 2016-17 and FY 2017-18 is also discussed in 24<sup>th</sup> MSPC meeting held on 11.12.2018 at MSEDCL's Mumbai office. Mumbai utilities viz. AEML (erstwhile RInfra-D), TPC-D and BEST in principle agreed for this provisional recovery of FBSM bills as sought by MSEDCL for period FY 2016-17 and FY 2017-18 as per methodology mentioned in MSEDCL's letter dated 12.11.2018. Copy of letter dated 12.11.2018 is annexed as Annexure D.
15. In view of the above paras from 9-13, MSEDCL request Hon'ble Commission to pass the directives to MSLDC to expedite for raising the demand of Rs 989.41 Cr (which is already being recovered) from Mumbai utilities immediately and pass on the payable amount to MSEDCL at the earliest so as to reduce the financial burden of MSEDCL. Therefore, the amount as sought by MSEDCL in para 6 and 8 above



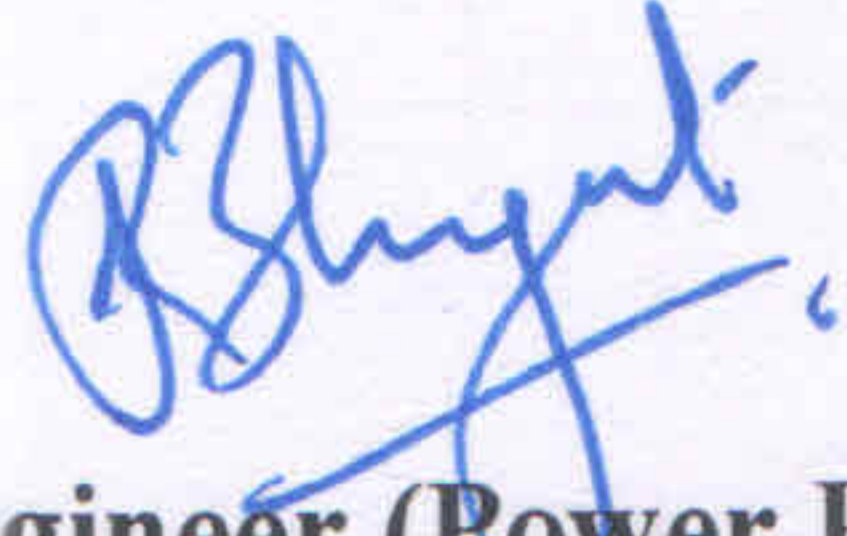
shall be amended after adjusting the amount as receivable to MSEDCL as per the methodology mentioned in para 12 to 14.

16 Prayers:

The Petitioner therefore, based on the submissions made in the foregoing paragraphs, most respectfully prays to the Hon'ble Commission:

- a) To admit the present additional submission in the Petition no. 297 of 2018.
- b) To allow MSEDCL to modify / correct the figures as mentioned in paras 5,6,7 and 8 of the present additional submission.
- c) To allow the recovery of revised estimated amount of Rs. 1009.65 Cr towards fixed cost component for the net imbalance units supplied by MSEDCL to the state imbalance pool alongwith the carrying cost of Rs.182.60 Cr upto March 2018 as mentioned in para 6 and revised estimated amount of Rs. 2373.90 Cr towards compensation of variable charges alongwith carrying cost of Rs. 651.38 Cr upto March 2018 as shown in para 8, thus to allow the recovery of total revised estimated amount of Rs. 4217.52 Cr.
- d) To pass the directives to MSLDC to expedite for raising the demand of Rs 989.41 Cr for FBSM pool of the FY 2016-17 and FY 2017-18 from Mumbai utilities which are already being recovered and pass on the same to MSEDCL at the earliest so as to reduce the financial burden of MSEDCL.
- e) To pass any other order/relief as the Hon'ble Commission may deem fit and appropriate under the circumstances of the case and in the interest of justice;
- f) To condone any error/omission and to give opportunity to rectify the same;



  
Chief Engineer (Power Purchase)  
MSEDCL  
Chief Engineer (Power Purchase Section)  
MSEDCL  
Prakashgad, 5th Floor,  
Prof. Anant Kanekar Marg,  
Bandra (East), Mumbai - 400 051.

## Rev. Annexure- XI

Details of Mus and estimated amount to be recovered towards fixed cost in r/o MSEDCL for FY 2011-12 to FY 2017-18 :

FY	Net Imbalance Units in Mus	MSEDCL's Average fixed cost rate/Kwh, Rs.	Amount, Rs. Cr.	Term (period) - considered one year later	Interest rate (AVG. BASE RATE +2%)	Term (years)	Compounding period per year	Present value of Dues	Interest component	Total amount, Rs Cr
2011-12	-559.535	0.67	-37.49	2013-14 to 2017-18	11.9000%	6	12	₹ -76.29	-38.80	-76.29
2012-13	-23.009	0.77	-1.77	2014-15 to 2017-18	11.8500%	5	12	₹ -3.19	-1.42	-3.19
2013-14	1237.124	0.89	110.10	2015-16 to 2017-18	11.6200%	4	12	₹ 174.86	64.76	174.86
2014-15	1508.336	1.09	164.41	2016-17 to 2017-18	11.0800%	3	12	₹ 228.89	64.48	228.89
2015-16	2512.408	1.16	291.44	2017-18 to 2018-19	9.9750%	2	12	₹ 355.49	64.05	355.49
2016-17#	1848.811	1.37	253.29	2017-18	11.0800%	1	12	₹ 282.82	29.53	282.82
2017-18*	1359.000	1.69	229.67	2018-19	9.9750%	0	12	₹ 229.67	0.00	229.67
Total	7883.135		1009.65					₹ 1,192.25	182.60	1192.25

Note: (+)ve units indicates underdrawl units and (-) ve units indicate overdrawl units

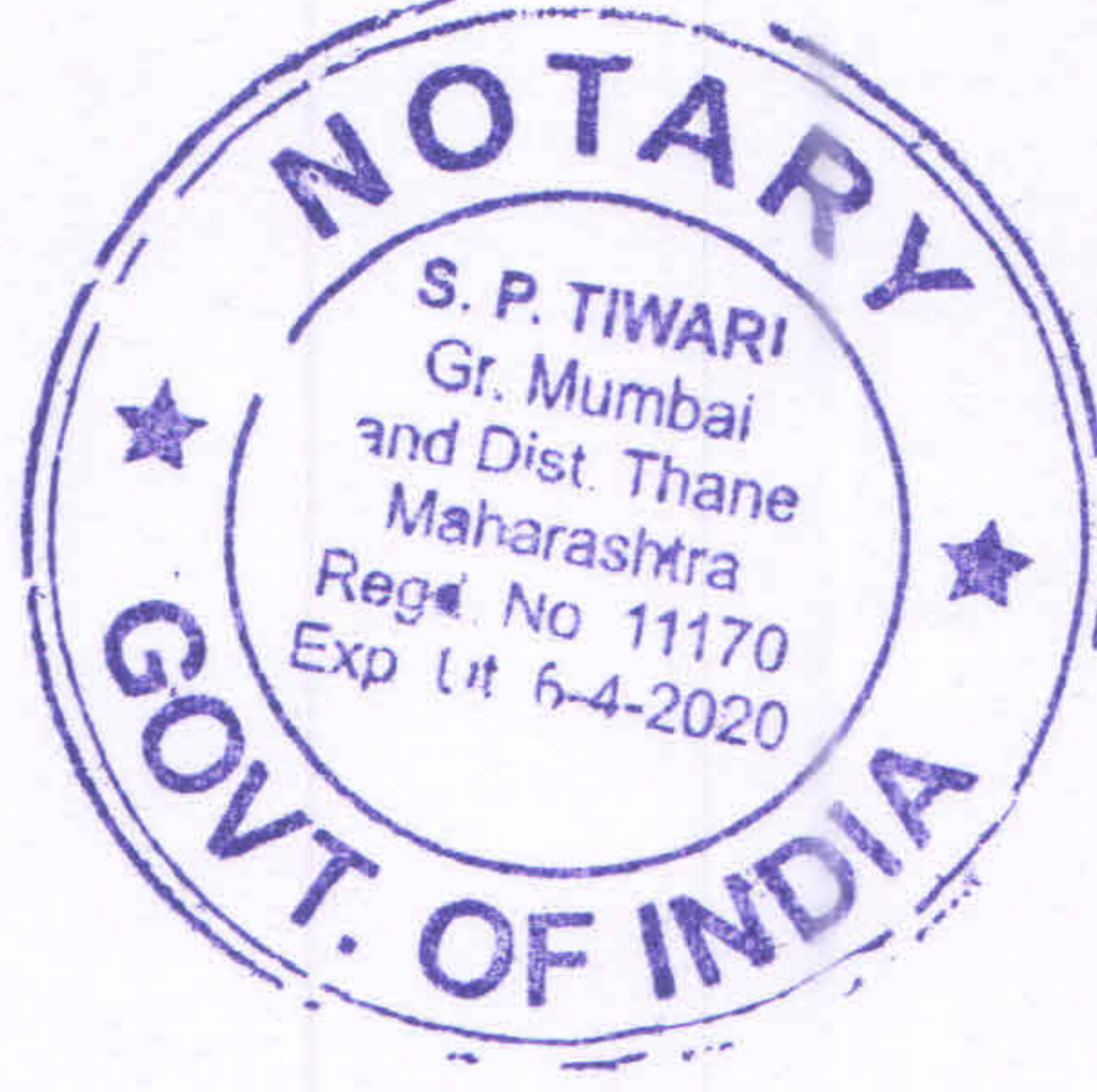
(-) ve amount indicates amount payable

\* Units as per DSR Report as provisional FBSM bills upto December 2016 are issued

# Imbalance units upto December 2016 are considered

### For interest calculation:

1. Interest rate considered - Up to March 2016 - Base rate plus 2% .  
From April 2016 - MCLR plus 2%.
2. Monthly compounding working is done.



## Rev. Annexure - XVI (A)

Differential charges to be recovered towards variable rates in r/o MSEDCL for FY 2011-12 to FY 2017-18 alongwith interest :

FY	Net Imbalance Units in Mus	Estimated amount to be recovered, Rs Cr.	Term (period) - considered one year later	Interest rate (AVG. BASE RATE +2%)	Term (years)	Compounding period per year	Present value of Dues	Interest component	Total amount, Rs Cr
2011-12	-559.535	25.27	2013-14 to 2017-18	11.9000%	6	12	₹ 51.42	26.15	51.42
2012-13	-23.009	78.19	2014-15 to 2017-18	11.8500%	5	12	₹ 140.99	62.80	140.99
2013-14	1237.124	298.71	2015-16 to 2017-18	11.8100%	4	12	₹ 477.98	179.27	477.98
2014-15	1508.336	525.59	2016-17 TO 2017-18	11.0800%	3	12	₹ 731.71	206.13	731.71
2015-16	2512.408	606.64	2017-18-2018-19	9.9750%	2	12	₹ 739.97	133.33	739.97
2016-17#	1848.811	374.73	2017-18	11.0800%	1	12	₹ 418.43	43.69	418.43
2017-18*	1359.000	464.78	2018-19	9.9750%	0	12	₹ 464.78	0.00	464.78
Total	7883.135	2373.90					3025.27	651.38	3025.27

Note: (+)ve units indicates underdrawl units

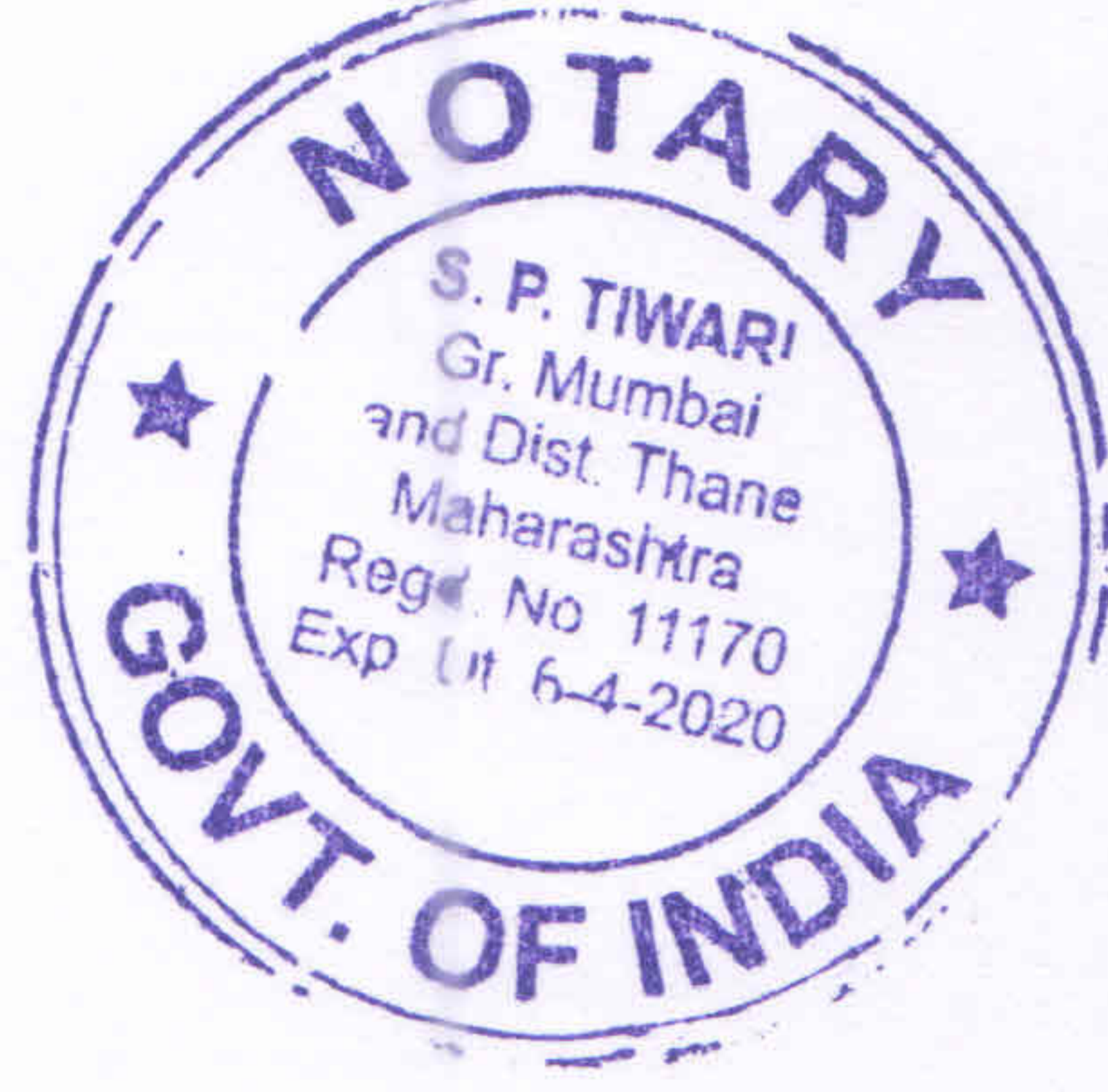
\* based on DSR data of MSLDC as provisional FBSM bills upto December 2016 are issued

# Imbalance units upto December 2016 are considered

**For interest calculation:**

1. Interest rate considered - Up to March 2016 - Base rate plus 2% .  
From April 2016 - MCLR plus 2%.

**2. Monthly compounding working is done.**





Differential amount to be recovered due to difference in highest variable rate of LTPP/STOA/ Exchange purchase and net FBSM pool rate in r/o MSEDCL:

FY 2011-12:

Months	Imbalance Units, Mus	Net Pool Amount, Rs Cr.	Net FBSM Pool rate per Kwh, Rs.	Highest# purchase rate per Kwh, Rs.	Diff	Estimated Amount to be recovered in Rs. Cr.
Aug-11	-151.06	35.89	2.38			NA
Sep-11	-288.86	101.87	3.53			NA
Oct-11	-84.75	73.24	8.64			NA
Nov-11	-22.67	18.38	8.11			NA
Dec-11	-30.15	15.94	5.29			NA
Jan-12	81.80	-12.44	1.52	2.95	1.42964029	11.69
Feb-12	63.86	-5.55	0.87	2.95	2.12565967	13.57
Mar-12	-127.69	58.64	4.59			NA
Total	-559.53	285.96				25.27

FY 2012-13:

Months	Imbalance Units, Mus	Net Pool Amount, Rs Cr.	Net FBSM Pool rate per Kwh, Rs.	Highest# purchase rate per Kwh, Rs.	Diff	Estimated Amount to be recovered in Rs. Cr.
Apr-12	-221.09	61.48	2.78	3.32	0.54	NA
May-12	99.69	-24.09	2.42	3.42	1.00	10.00
Jun-12	12.89	4.57	3.54	3.35	-0.19	NA
Jul-12	108.30	-37.61	3.47	4.36	0.89	9.61
Aug-12	-136.95	37.83	2.76	4.04	1.28	NA
Sep-12	29.33	5.63	-1.92	4.03	5.95	17.45
Oct-12	13.68	14.55	10.63	3.94	-6.69	NA
Nov-12	1.17	13.12	111.98	3.97	-108.01	NA
Dec-12	22.37	6.68	2.99	4.00	1.01	2.27
Jan-13	161.52	-26.88	1.66	4.07	2.41	38.86
Feb-13	-6.43	4.31	6.71	4.14	-2.57	NA
Mar-13	-107.51	29.94	2.78	4.14	1.36	NA
Total	-23.01	89.52				78.19

FY 2013-14:

Months	Imbalance Units, Mus	Net Pool Amount, Rs Cr.	Net FBSM Pool rate per Kwh, Rs.	Highest# purchase rate per Kwh, Rs.	Diff	Estimated Amount to be recovered in Rs. Cr.
Apr-13	1.66	12.36	74.64	3.91	-70.73	NA
May-13	-24.20	10.01	4.13	4.08	-0.05	NA
Jun-13	92.36	-14.46	1.57	4.06	2.49	23.03
Jul-13	151.97	-23.10	1.52	4.06	2.54	38.60
Aug-13	19.35	-8.18	4.23	4.07	-0.16	-0.31
Sep-13	79.40	-13.70	1.73	4.05	2.32	18.45
Oct-13	179.09	-31.62	1.77	4.35	2.58	46.28
Nov-13	162.71	-19.71	1.21	4.1	2.89	47.00
Dec-13	120.76	-23.06	1.91	3.91	2.00	24.16
Jan-14	118.85	-24.26	2.04	3.91	1.87	22.22
Feb-14	149.61	-22.63	1.51	3.55	2.04	30.49
Mar-14	185.56	-19.87	1.07	3.70	2.63	48.78
Total	1237.12	-157.20				298.71

FY 2014-15:

Months	Imbalance Units, Mus	Net Pool Amount, Rs Cr.	Net FBSM Pool rate per Kwh, Rs.	Highest# purchase rate per Kwh, Rs.	Diff	Estimated Amount to be recovered in Rs. Cr.
Apr-14	-57.27	23.75	4.15	4.09	-0.05681228	NA
May-14	-30.48	15.08	4.95	4.09	-0.85778899	NA
Jun-14	22.19	14.84	6.69	4.28	-2.40820828	NA
Jul-14	168.92	-20.74	1.23	4.28	3.052282248	51.56
Aug-14	133.54	-12.21	0.91	4.56	3.645322393	48.68
Sep-14	181.40	-22.20	1.22	4.21	2.986427618	54.18
Oct-14	141.16	-5.80	0.41	4.2	3.788796229	53.48
Nov-14	253.93	-26.40	1.04	4.15	3.110393712	78.98
Dec-14	242.37	-25.11	1.04	4.24	3.203903803	77.65
Jan-15	190.56	-7.12	0.37	4.24	3.8652132	73.68
Feb-15	174.14	-23.14	1.33	4.37	3.041437098	52.96
Mar-15	87.87	-3.99	0.45	4.37	3.916034443	34.41
Total	1508.34	-93.03				525.59

FY 2015-16:

Months	Imbalance Units, Mus	Net Pool Amount, Rs Cr.	Net FBSM Pool rate per Kwh, Rs.	Highest# purchase rate per Kwh, Rs.	Diff	Estimated Amount to be recovered in Rs. Cr.
Apr-15	129.52	-9.19	0.71	4.19	3.48	45.08
May-15	127.21	-12.47	0.98	4.28	3.30	41.97
Jun-15	136.22	-12.61	0.93	4.73	3.80	51.83
Jul-15	89.68	5.52	0.62	4.3	3.68	33.05
Aug-15	209.39	-25.07	1.20	4.3	3.10	64.96
Sep-15	270.37	-56.69	2.10	4.08	1.98	53.62
Oct-15	274.86	-53.02	1.93	4.02	2.09	57.48
Nov-15	362.81	-71.03	1.96	4.13	2.17	78.81
Dec-15	238.54	-46.15	1.93	4.12	2.19	52.13
Jan-16	219.51	-50.48	2.30	4.22	1.92	42.15
Feb-16	264.11	-51.60	1.95	3.84	1.89	49.81
Mar-16	190.19	-35.57	1.87	3.75	1.88	35.75
Total	2512.41	-418.37				606.64

FY 2016-17:

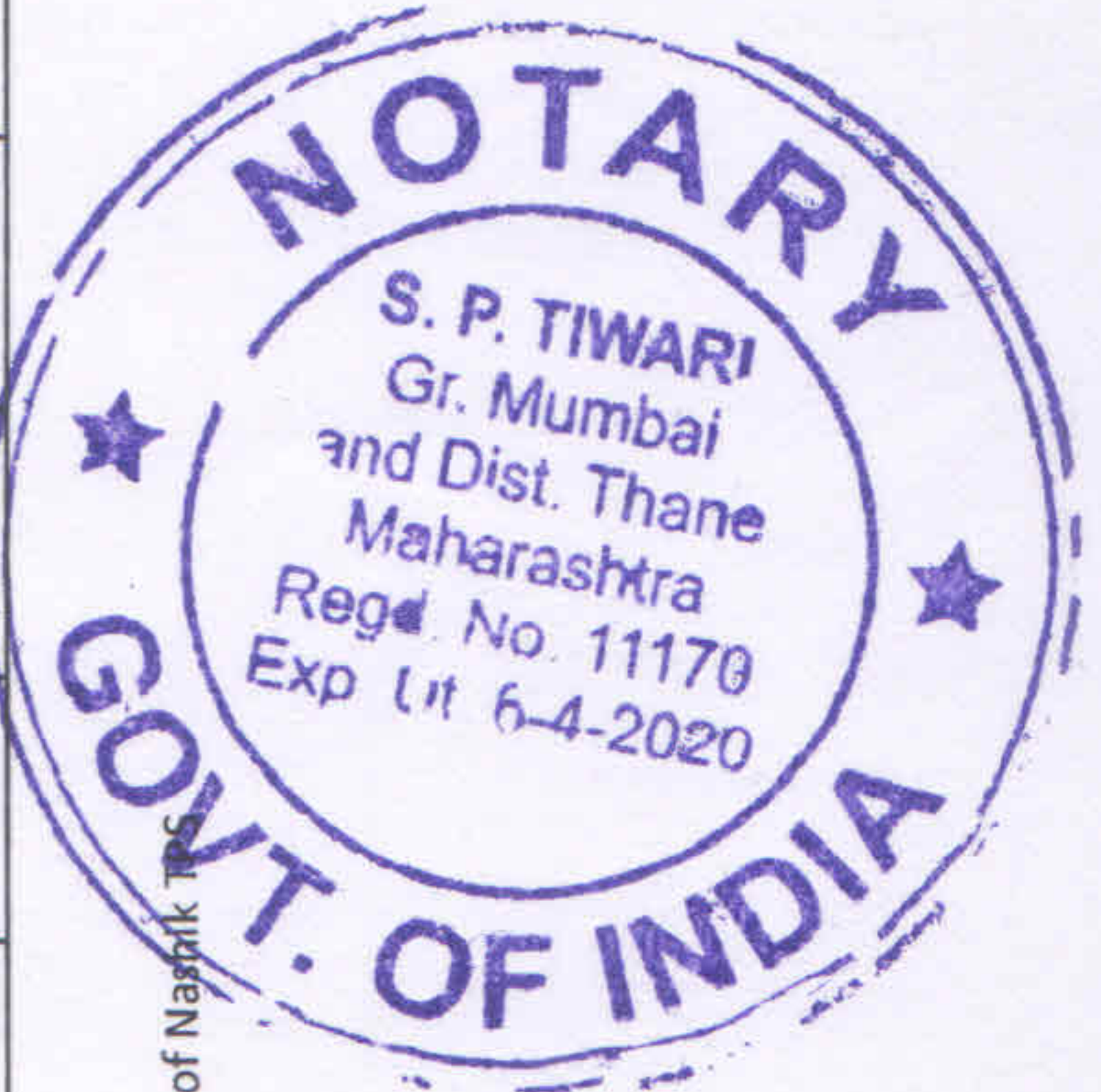
Months	Imbalance Units, Mus	Net Pool Amount, Rs Cr.	Net FBSM Pool rate per Kwh, Rs.	Highest# purchase rate per Kwh, Rs.	Diff	Estimated Amount to be recovered in Rs. Cr.
Apr-16	151.79	-27.83	1.83	3.64	1.81	27.42
May-16	241.45	-37.25	1.54	3.52	1.98	47.74
Jun-16	248.33	-44.34	1.79	3.44	1.65	41.08
Jul-16	171.81	-27.88	1.62	3.64	2.02	34.65
Aug-16	134.41	-20.93	1.56	3.68	2.12	28.53
Sep-16	182.16	-36.71	2.02	2.96	0.94	17.21
Oct-16	171.88	-37.68	2.19	3.52	1.33	22.82
Nov-16	128.99	-26.91	2.09	3.42	1.33	17.20
Dec-16	68.70	-10.52	1.53	3.26	1.73	11.88
Jan-17	149.38			3.52		52.58
Feb-17	88.06			3.80		33.46
Mar-17	111.85			3.59		40.15
Total	1848.81	-270.07				374.73

Imbalance units for Jan-17 to Mar-17 as per Daily System report (DSR)

FY 2017-18:

Months	Imbalance Units, Mus	Highest# purchase rate per Kwh, Rs.	Estimated Amount to be recovered in Rs. Cr.
FY 2017-18	1359.000	3.42	464.78

\$ Average power purchase rate of Nashik is considered Imbalance units as per Daily System report (DSR)



Note: (-ve) imbalance units indicate overdrawl units and (+ve) imbalance units indicate underdrawl units

#Highest power purchase rate of MSEDCL for FY 2011-12 to FY 2015-16 is considered of Power purchase rate of Nashik

Annexure - A

Before the  
**MAHARASHTRA ELECTRICITY REGULATORY COMMISSION**  
World Trade Centre, Centre No.1, 13th Floor, Cuffe Parade, Mumbai 400 005  
Tel. No. 022 22163964/65/69 – Fax 022 22163976  
E-mail: [mercindia@merc.gov.in](mailto:mercindia@merc.gov.in)  
Website: [www.mercindia.org.in](http://www.mercindia.org.in) / [www.merc.gov.in](http://www.merc.gov.in)

**Case No.200 of 2017**

**IN THE MATTER OF**

**Petition of Reliance Infrastructure Ltd. (Distribution Business) for Mid-Term Review, including Truing up for FY 2015-16 and FY 2016-17, provisional Truing up of FY 2017-18 and revised ARR and Tariff for FY 2018-19 and FY 2019-20**

**Coram**

**Shri Anand B. Kulkarni, Chairperson**  
**Shri I.M. Bohari, Member**  
**Shri Mukesh Khullar, Member**

**Date: 12 September, 2018**



**ORDER**

In accordance with Regulation 5 of the Maharashtra Electricity Regulatory Commission (Multi Year Tariff (MYT)) Regulations, 2015 ('MYT Regulations'), Reliance Infrastructure Ltd. (Distribution Business) (RInfra-D), has submitted its Petition for Mid-Term Review (MTR), including truing up of FY 2015-16 and FY 2016- 17, provisional truing up of 2017-18 and revised Aggregate Revenue Requirement (ARR) and revised Tariff for FY 2018-19 and 2019-20. The original Petition was filed on 21 December, 2017 and RInfra-D submitted a revised Petition on 26 June, 2018.

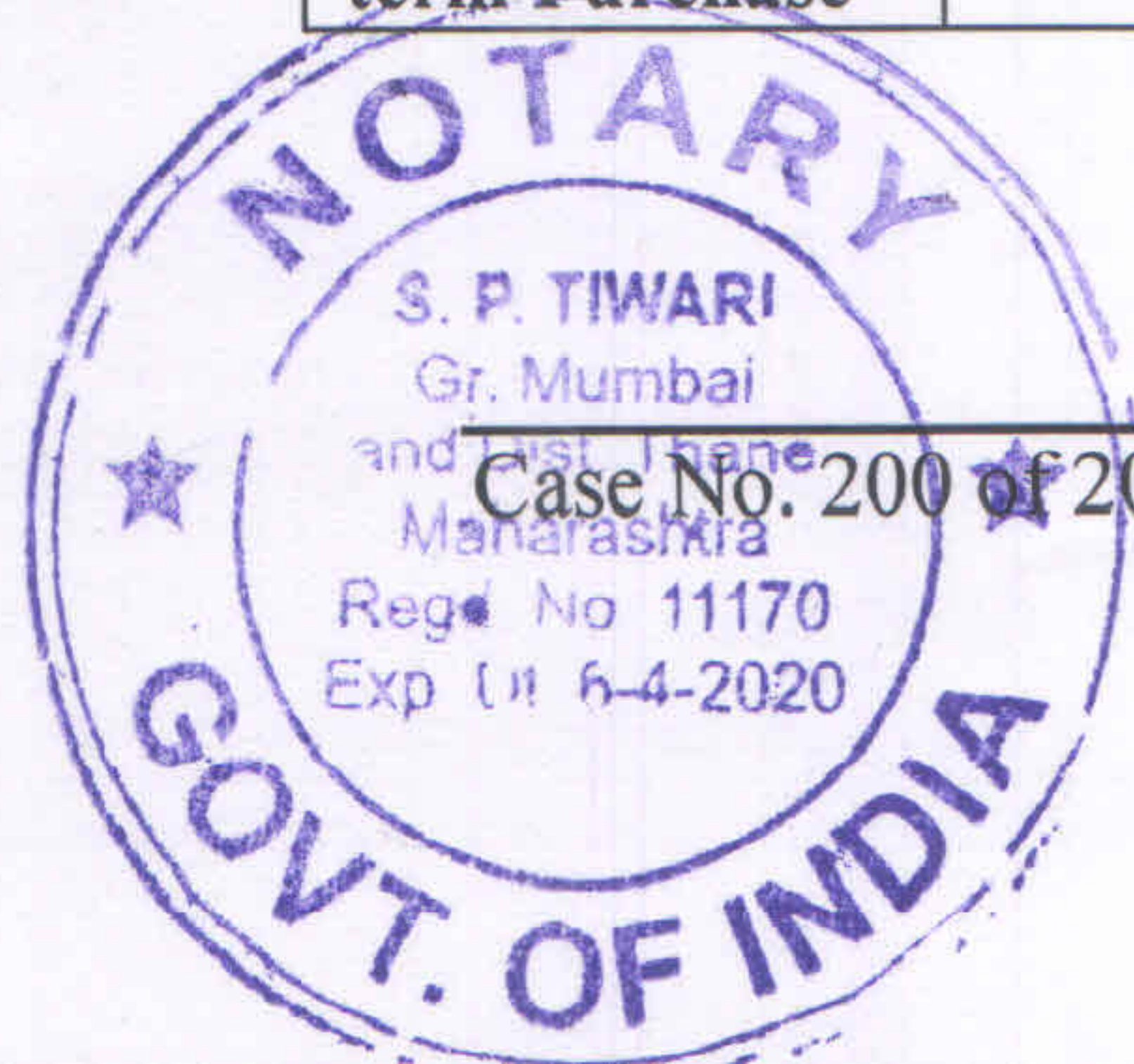
In exercise of its powers under Sections 86 and Section 62 (read with Section 61) of the Electricity Act (EA), 2003 and all other powers enabling it in this behalf, and after taking into consideration all the submissions made by RInfra-D, the public and stake-holders and all other relevant material, the Commission issues the following Order.

power interchange between various pool participants. Accordingly, RInfra-D should plan its power procurement in a way that the purchases from the Imbalance Pool are minimised.

The Commission has considered the energy drawn by RInfra-D at T<math>\diamond</math>D interface based on the State-wide data provided by MSLDC, as per the usual practice. Hence, the Imbalance Pool quantum has been adjusted accordingly, while keeping the amount paid by RInfra-D to the Pool the same. Accordingly, the Commission has approved the power procurement from the short-term sources in FY 2016-17, as shown in the Table below:

**Table 4-31: Short Term Power Purchase for FY 2016-17 as approved by the Commission**

Particulars	MYT Order			MTR Petition			Approved in this Order		
	Quantum	Cost	Rate per Unit	Quantum	Cost	Rate per Unit	Quantum	Cost	Rate per Unit
	(MU)	(Rs. crore)	(Rs/kWh)	(MU)	(Rs. crore)	(Rs/kWh)	(MU)	(Rs. crore)	(Rs/kWh)
Bilateral				189.81	58.37	3.08	189.81	58.37	3.08
Power Exchanges				853.02	247.37	2.90	853.02	247.37	2.90
Banking Fee				0.63			0.63		
Purchase from Non-firm OA consumers*				4.12			4.12		
Lapsed energy from Non-firm OA consumers				2.48			2.48		
Lapsed energy of firm OA consumers				5.06			5.06		
<b>Short Term Power Purchase</b>				<b>1055.12</b>	<b>305.74</b>	<b>2.90</b>	<b>1055.12</b>	<b>305.74</b>	<b>2.90</b>
MSEDCL Stand-by				0.55	0.22	4.00	0.55	0.22	4.00
MSEDCL Standby - Previous year adjustment					0.31			0.31	
Imbalance Pool				807.96	257.99	3.19	807.96	257.99	3.19
Imbalance Pool - Previous year adjustment					(13.92)			(13.92)	
<b>Total Short-term Purchase</b>	<b>1410.66</b>	<b>442.91</b>	<b>3.14</b>	<b>1,863.63</b>	<b>550.34</b>	<b>2.95</b>	<b>1,863.63</b>	<b>550.34</b>	<b>2.95</b>



**Table 5-32: Stand-by Charges for FY 2017-18 as approved by Commission (Rs. Crore)**

Particulars	MTR Order	MTR Petition	Approved in this Order
Stand-by Charges	171.12	171.12	171.12

### 5.3.8 SUMMARY OF POWER PURCHASE

#### *RInfra-D Submission*

The summary of provisional actuals of power purchase quantum and cost for FY 2017-18 as against the quantum and cost approved by the Commission in RInfra-D's MYT Order (Case No. 34 of 2016) is as under:

**Table 5-33: Power Purchase for FY 2017-18 as submitted by RInfra-D**

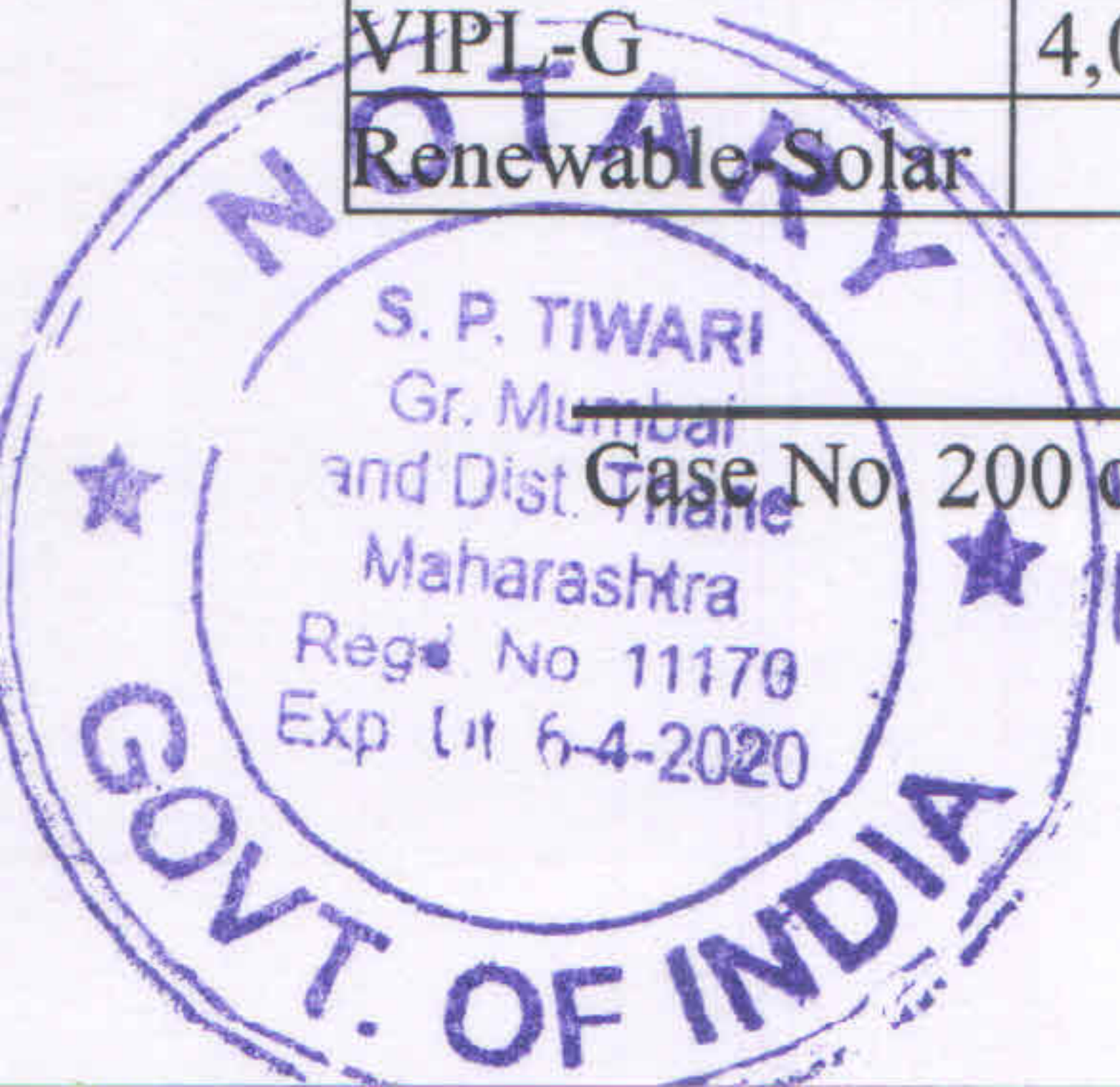
Source	MYT Order			MTR Petition		
	Quantum (MU)	Cost (Rs. Crore)	Rate (Rs. / kWh)	Quantum (MU)	Cost (Rs. Crore)	Rate (Rs. / kWh)
DTPS	3,800.65	1,566.90	4.12	3,189.75	1,468.76	4.6
VIPL	4,059.71	1,788.08	4.4	3,113.59	1,476.12	4.74
Renewable - Solar	68.52	70.64	10.31	65.45	75.44	11.53
Solar REC		44.87			0	
Renewable - Non-Solar	206.63	105.99	5.13	200.67	102.27	5.1
Non-Solar REC		123.93			(0.13)	
Short Term Purchase	1,700.62	533.95	3.14	2,831.11	1,058.43	3.74
Surplus Sale		0		(24.45)	(8.77)	3.59
Transmission Charges		402.02			402	
SLDC Charges		1.3			1.3	
Standby Charges		171.12			171.12	
<b>Total</b>	<b>9,836.13</b>	<b>4,808.81</b>	<b>4.89</b>	<b>9,376.13</b>	<b>4,746.54</b>	<b>5.06</b>

#### *Commission's Analysis and Ruling*

Based on the source-wise approval of power purchase as discussed above, the power purchase quantum and cost approved after provisional truing-up for FY 2017-18 is as shown in the following Table:

**Table 5-34: Power Purchase for FY 2017-18 approved by the Commission (MU)**

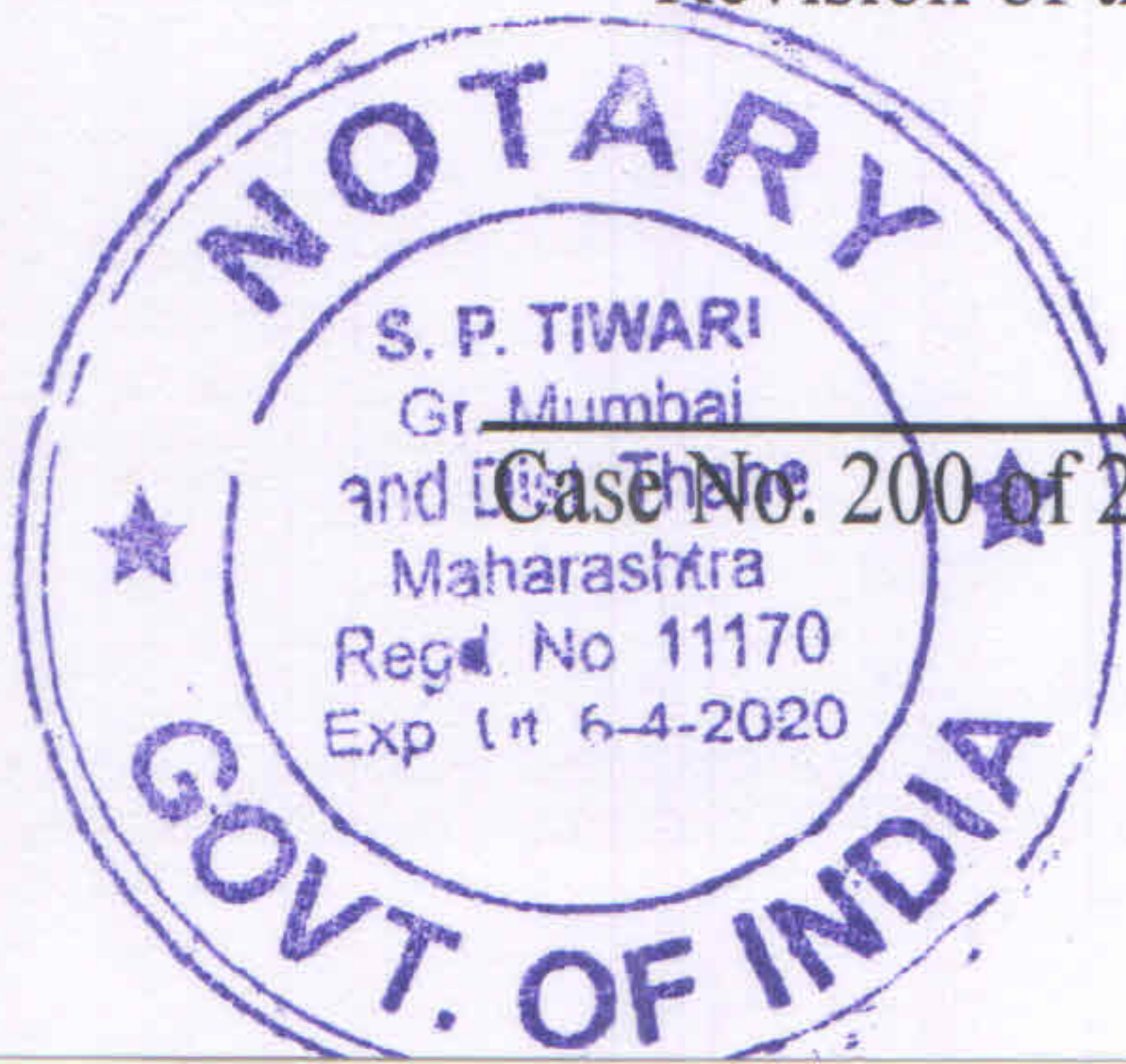
Particulars	MYT Order			MTR Petition			Approved in this Order		
	Quantum (MU)	Cost (Rs. Crore)	Rate (Rs./ kWh)	Quantum (MU)	Cost (Rs. Crore)	Rate (Rs./ kWh)	Quantum (MU)	Cost (Rs. Crore)	Rate (Rs./ kWh)
DTPS	3,800.65	1,566.90	4.12	3,189.75	1,468.76	4.60	3,189.75	1,468.76	4.60
VIPL-G	4,059.71	1,788.08	4.40	3,113.59	1,476.12	4.74	3,113.59	1,476.12	4.74
Renewable Solar	68.52	70.64	10.31	65.45	75.44	11.53	65.45	68.79	10.51



cost through ARR. In light of the above, the Commission is provisionally approving the capitalization of the scheme limited to the in-principle approved cost of the DPR.

Accordingly, against RInfra-D's claim of Rs. 23.27 Crore for FY 2016-17, the Commission is allowing the capitalization limiting to the DPR approved cost. However, the capitalization is being approved on provisional basis as the Commission may undertake third party verification after completion of the scheme. Hence, although the Commission is undertaking truing up for FY 2016-17 through this Order, the capitalization of Rs. 23.27 Crore approved for this scheme for FY 2016-17 will be revisited after third party verification and will be finally approved based on the third party verification. RInfra-D is directed to inform the Commission immediately after completion of the scheme.

- ii. **Services (2016-17) – New Supply:** The DPR approved cost is. Rs. 45.13 Cr. RInfra-D has claimed capitalization of Rs. 69.80 Crore till FY 2018-19. RInfra-D, in its Petition, has provided the reasons for cost overrun and stated that while approving the DPR for Services-New Supply for FY 2016-17, the Commission has considered the lowest quantities among all submissions of RInfra-D. Subsequently, RInfra-D had submitted the actual project-wise material consumption and capital expenditure under this DPR. However, since the capital expenditure against Services New Supply DPR for FY 16-17 was already approved by then, the revised capital expenditure against this scheme was not approved. RInfra-D further stated that New Supply schemes are obligatory under Universal Service Obligations (USO). There could be variances in actual expenditure and approved expenditure on account of actual number of services extended. As the Licensee cannot deny service extension based on the quantity of material approved to it, the actual capital expenditure will be different from what is approved and is required to be allowed, being obligatory expenditure. There is a difference in cost of Rs. 6.51 Crore because of difference in quantities considered in DPR and the estimated quantity of materials to be used. Also, in the DPR, based on past experience, about Rs. 12.80 Crore was proposed for total Road Reinstatement (RI) expenses. However, actual RI Charges paid to the authorities till FY 2017-18 have been about Rs. 22.94 Crore. Further, due to lower quantity approved in the DPR, the actual RI charges approved in the DPR was only Rs. 8.14 Crore. Thus, on RI charges alone, there was a shortfall in approved capex to the tune of Rs. 14.80 Crore. The balance cost variation is primarily due to higher actual labour expenses during the year, post Wage Revision of the Staff and Labour in FY 2016-17.



Particulars	MYT Order			MTR Petition			Approved in this Order		
	Quantum (MU)	Cost (Rs. Crore)	Rate (Rs./ kWh)	Quantum (MU)	Cost (Rs. Crore)	Rate (Rs./ kWh)	Quantum (MU)	Cost (Rs. Crore)	Rate (Rs./ kWh)
Solar REC		44.87			-		-	-	
Renewable-Non-Solar	206.63	105.99	5.13	200.67	102.27	5.10	200.67	102.27	5.10
Non-Solar REC		123.93			(0.13)		-	(0.13)	
Short-term Purchase	1,700.62	533.95	3.14	1,956.13	749.69	3.83	1,956.13	749.69	3.83
Imbalance Pool				863.76	302.67	3.50	861.88	302.66	3.51
Purchase under MSEDCL Stand-by				11.22	4.50	4.01	11.22	4.49	4.00
Surplus Sale		0		(24.45)	(8.77)	3.59	(24.45)	(8.77)	3.59
Surplus RE energy bought from OA Consumers					1.59			1.59	
Transmission Charges		402.02			402.00			402.00	
MSLDC Charges		1.30			1.30			1.30	
Stand-by Charges		171.12			171.12			171.12	
<b>Total</b>	<b>9,836.13</b>	<b>4,808.81</b>	<b>4.89</b>	<b>9,376.13</b>	<b>4,746.54</b>	<b>5.06</b>	<b>9,374.24</b>	<b>4,739.88</b>	<b>5.06</b>

### 5.3.9 Interest on FAC

#### *RInfra-D Submission*

RInfra-D submitted that since the matter is in ATE, RInfra-D has not claimed the interest on FAC for FY 2017-18. The Commission has approved FAC till third quarter of FY 2017-18 on post facto basis till now. The interest of FAC charged to the consumers is Rs. (0.07) Crore.

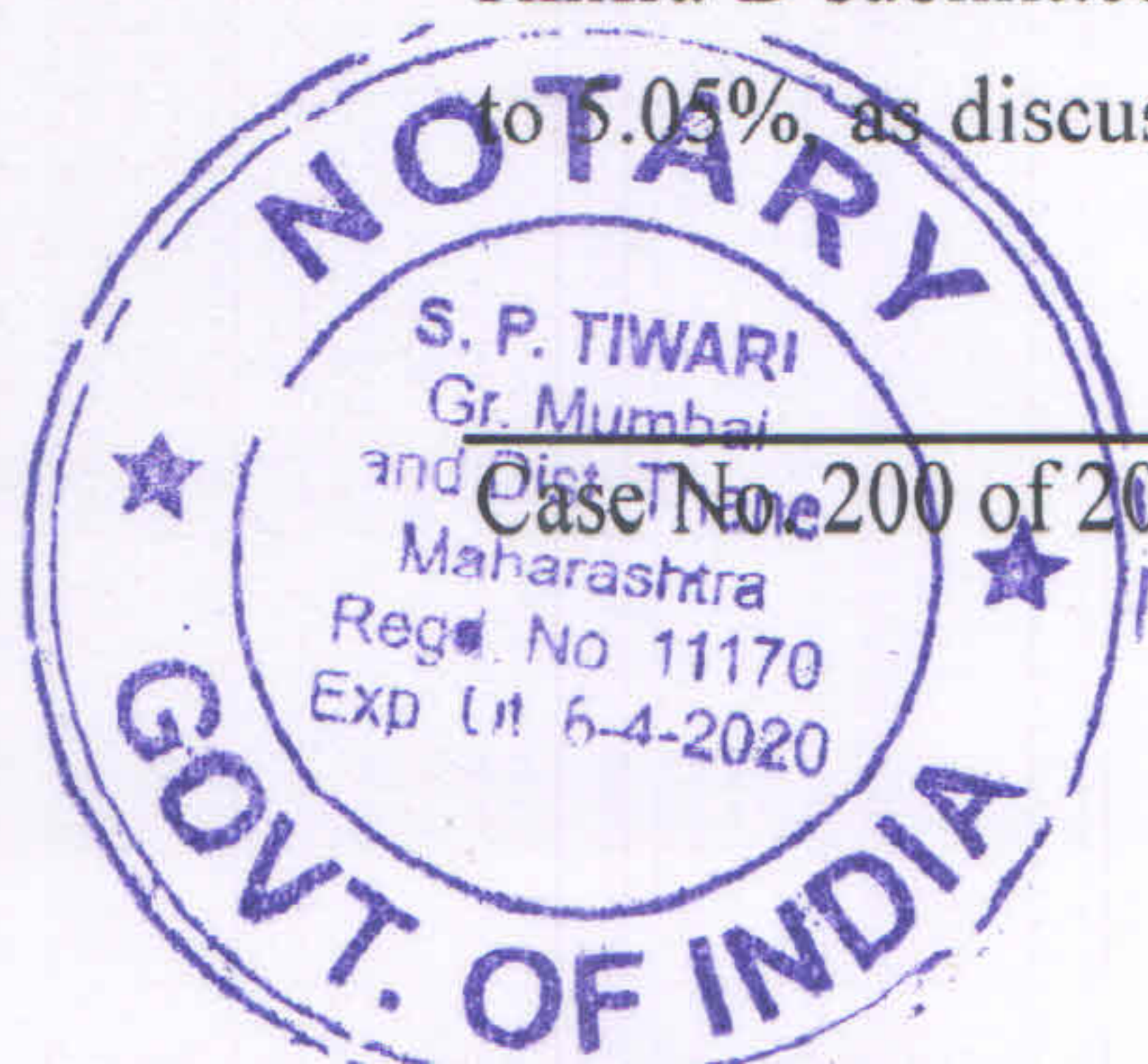
#### *Commission's Analysis and Ruling*

The Commission has not considered any interest on FAC as part of the ARR, in line with the approach adopted in the MYT Order.

### 5.4 OPERATION AND MAINTENANCE EXPENSES

#### *RInfra-D Submission*

RInfra-D submitted that the escalation rate for projecting O&M expenses has been revised to 5.05% as discussed in the earlier Chapter. The same is applied to the allowable O&M



Annexure - B

Before the  
**MAHARASHTRA ELECTRICITY REGULATORY COMMISSION**  
World Trade Centre, Centre No.1, 13th Floor, Cuffe Parade, Mumbai 400 005  
Tel. No. 022 22163964/65/69 – Fax 022 22163976  
E-mail: [mercindia@merc.gov.in](mailto:mercindia@merc.gov.in)  
Website: [www.mercindia.org.in/](http://www.mercindia.org.in/) [www.merc.gov.in](http://www.merc.gov.in)

CASE No. 69 of 2018

In the matter of

**Petition of The Tata Power Company Ltd. (Distribution) for approval of Truing-up of FY 2015-16, Truing-up for FY 2016-17, provisional Truing-up for FY 2017-18 and Aggregate Revenue Requirement and Tariff for FY 2018-19 and FY 2019-20**

Coram

**Shri Anand B. Kulkarni, Chairperson**

**Shri I.M. Bohari, Member**

**Shri Mukesh Khullar, Member**

**Date: 12 September, 2018**

ORDER

In accordance with Regulation 5 of the Maharashtra Electricity Regulatory Commission (Multi Year Tariff) Regulations, 2015 (herein after referred as “MYT Regulations, 2015”), M/s. The Tata Power Company Limited (Distribution Business) (TPC-D), Homi Modi Street, Fort, Mumbai, has filed its Petition for Mid-Term Review (MTR) of third MYT Control Period including truing-up of FY 2015-16 and FY 2016-17, provisional truing-up of 2017-18, and Revised Aggregate Revenue Requirement (ARR) and Tariff for FY 2018-19 and FY 2019-20. The original Petition was filed on 25 January, 2018, and TPC-D submitted the revised Petition on 30 June, 2018.

In exercise of its powers under Sections 62 (read with Section 61) and 86 of the Electricity Act, 2003 (herein after referred as “the Act” or “EA, 2003”) and all other powers enabling it in this behalf, and after taking into consideration the submissions made by TPC-D, the public and stake-holders and all other relevant material, the Commission issues the following

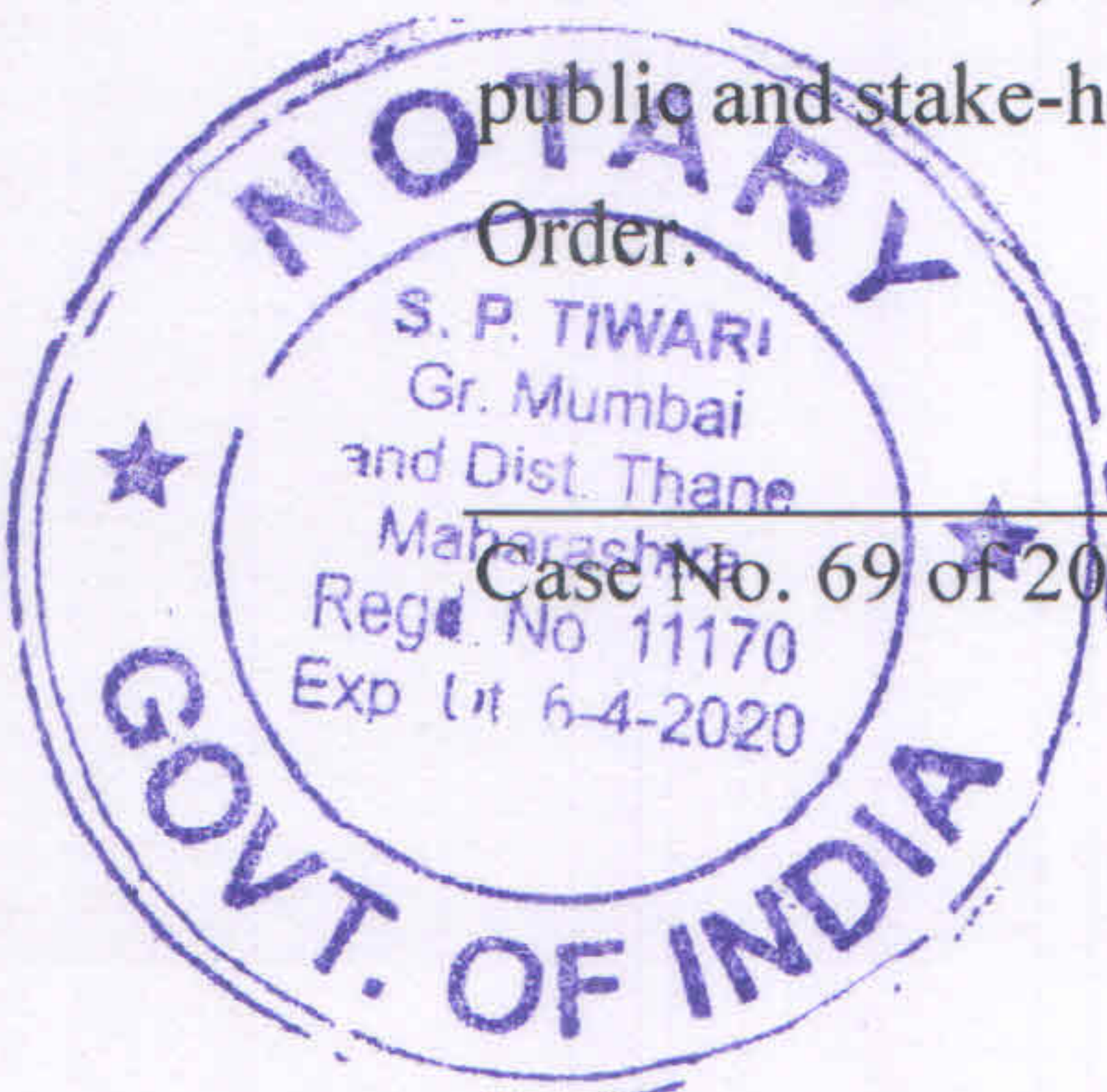
Order.

S. P. TIWARI  
Gr. Mumbai  
and Dist. Thane  
Maharashtra

Regd. No 11170  
Exp lit 6-4-2020

Case No. 69 of 2018- Mid Term Review Order for TPC-D

Page 1 of 387



this Order, the purchase quantum under the Imbalance Pool has been corrected based on the input from MSLDC.

The Commission in MYT Order has approved the ceiling rate for bilateral power purchase as Rs. 3.13/kWh for FY 2016-17. From the details of source-wise month-wise purchase, the Commission observes that TPC-D has purchased short-term power at rate of Rs. 2.62/kWh and power from Imbalance Pool at rate of Rs. 2.93/kWh, which are within the approved limits for power purchase from bilateral sources, and hence, separate approval from the Commission was not required.

The Commission notes that the quantum of energy purchased through the Imbalance Pool is significantly high, at around 8% of the overall power purchase quantum and almost half the quantum of power purchased through the bilateral sources. The rate of power purchase through the Imbalance Pool is also higher than that of bilateral sources. The Imbalance Pool mechanism should not be treated as a source of procuring power and is only meant for settling the deviations in the real-time power interchange between various pool participants. Accordingly, TPC-D should plan its power procurement in a way that the purchases from the Imbalance Pool are minimised.

The Commission has approved the power purchase from Bilateral Sources and Imbalance Pool for FY 2016-17, as shown in the Table below:

**Table 5-15: Bilateral Power Purchase Quantum & Cost for FY 2016-17 as approved by the Commission**

Source	MYT Order			MTR Petition			Approved in this Order		
	Quantum (MU)	Cost (Rs. crore)	Rate (Rs./kWh)	Quantum (MU)	Cost (Rs. crore)	Rate (Rs./kWh)	Quantum (MU)	Cost (Rs. crore)	Rate (Rs./kWh)
Bilateral Purchase	1,163.27	364.32	3.13	655.06	171.72	2.62	655.07	171.72	2.62
Imbalance Pool	-	-	-	379.03	109.50	2.89	370.77	109.50	2.95
<b>Total Short-term Purchase</b>	<b>1,163.27</b>	<b>364.32</b>	<b>3.13</b>	<b>1034.09</b>	<b>281.22</b>	<b>2.72</b>	<b>1025.84</b>	<b>281.22</b>	<b>2.74</b>

#### 5.4.4 Sale Outside Licence Area

##### TPC-D's Submission

TPC-D submitted that it had entered into an Agreement dated February 2, 2016 with Indian Railways for supply of 80 MW power in FY 2016-17. The rate of supply between TPC-D and Indian Railways was Rs 4.45 per kWh, which was derived from the approved power





**Table 6-11: Provisional Actual Bilateral Power Purchase Cost and Quantum for FY 2017-18 as submitted by TPC-D**

Particulars	Quantum (MU)	Rate (Rs/kWh)	Cost (Rs Crore)
Bilateral Power Purchase	323.02	2.87	92.56
Purchase from Imbalance pool	417.48	3.00	125.24
<b>Total</b>	<b>740.49</b>	<b>2.94</b>	<b>217.80</b>

**Commission's Analysis and Ruling**

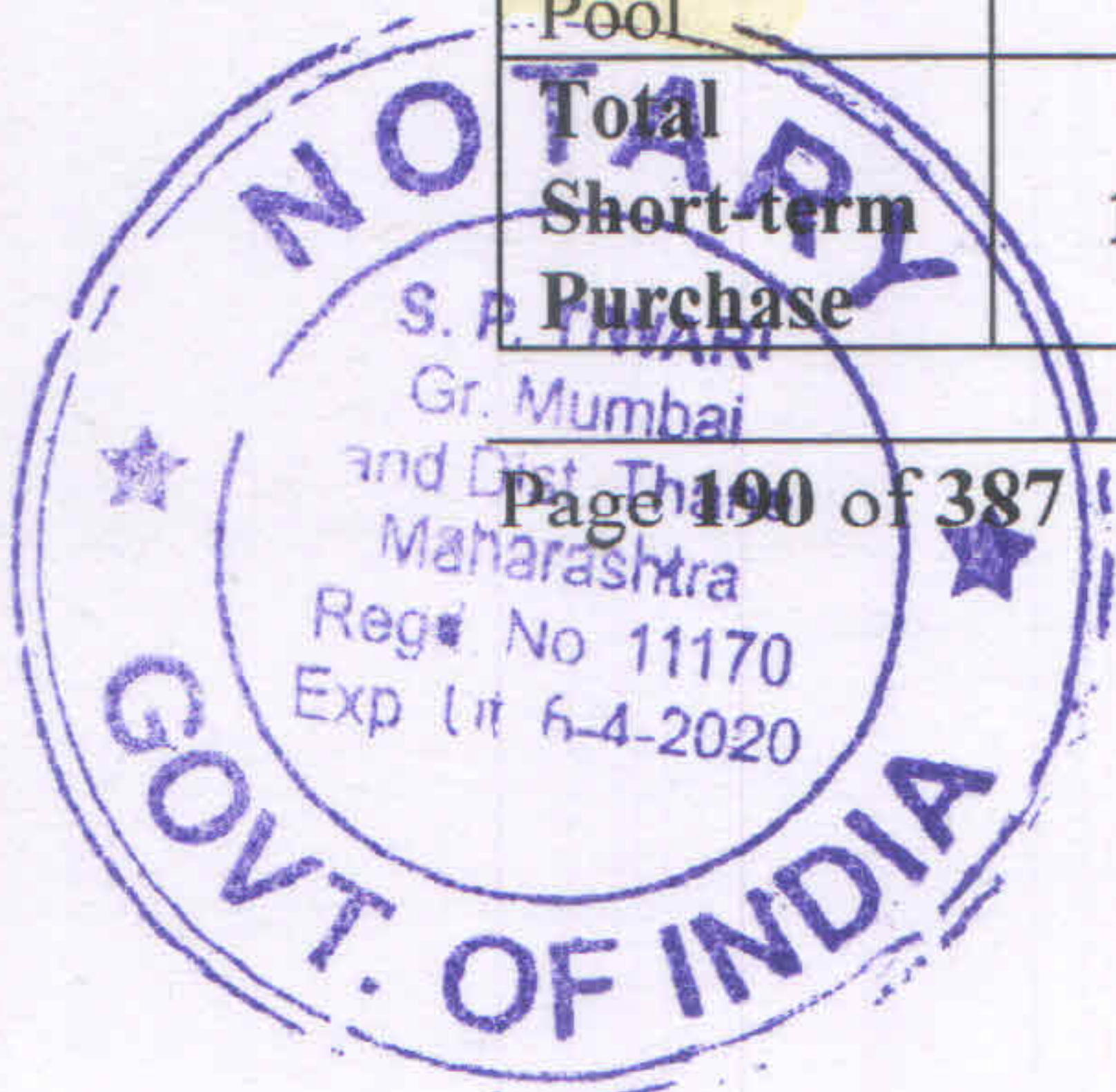
In response to clarifications sought by the Commission regarding Bilateral power purchase, TPC-D submitted that in FY 2017-18, it purchased bilateral power through MoP's DEEP Portal and through power exchange. The Commission also sought details of source-wise month-wise short-term purchase from TPC-D. TPC-D also submitted the copies of agreements for the short-term power purchased. The Commission after prudence check, has accepted TPC-D's submission in this regard, and accordingly approved the quantum and cost of power purchase from bilateral sources. The Commission approves the quantum and cost of power purchased from imbalance pool based on the provisional bills of FBSM. Further, as discussed in previous Section of this Order, the purchase quantum under the Imbalance Pool has been corrected based on the input from MSLDC.

The Commission in MYT Order has approved the ceiling rate for bilateral power purchase as Rs. 3.13/kWh for FY 2017-18. From the details of source-wise month-wise purchase, the Commission observes that TPC-D has purchased short-term power at rate of Rs. 2.87/kWh and power from imbalance pool at rate of Rs. 3.00/kWh, which are within approved limits for power purchase from bilateral sources and hence separate approval from the Commission was not required.

The Commission has approved the power purchase from Bilateral Sources and Imbalance Pool for FY 2017-18, as shown in the Table below:

**Table 6-12: Bilateral Power Purchase and Quantum & Cost for FY 2017-18 provisionally approved by the Commission**

Source	MYT Order			MTR Petition			Approved in this Order		
	Quantum (MU)	Cost (Rs. crore)	Rate (Rs./kWh)	Quantum (MU)	Cost (Rs. crore)	Rate (Rs./kWh)	Quantum (MU)	Cost (Rs. crore)	Rate (Rs./kWh)
Bilateral Purchase	1,300.34	407.25	3.13	323.02	92.56	2.87	323.02	92.56	2.87
Imbalance Pool	-	-	-	417.48	125.24	3.00	437.98	125.24	2.86
<b>Total Short-term Purchase</b>	<b>1,300.34</b>	<b>407.25</b>	<b>3.13</b>	<b>740.49</b>	<b>217.80</b>	<b>2.94</b>	<b>761.00</b>	<b>217.80</b>	<b>2.86</b>



Annexure-C

Before the  
**MAHARASHTRA ELECTRICITY REGULATORY COMMISSION**  
World Trade Centre, Centre No.1, 13<sup>th</sup> Floor, Cuffe Parade, Mumbai 400 005  
Tel. No. 022 22163964/65/69 – Fax 022 22163976  
E-mail: [mercindia@mercindia.org.in](mailto:mercindia@mercindia.org.in)/[mercindia@merc.gov.in](mailto:mercindia@merc.gov.in)  
Website: [www.mercindia.org.in](http://www.mercindia.org.in) / [www.merc.gov.in](http://www.merc.gov.in)

CASE No. 203 of 2017

In the matter of  
**Petition of Brihanmumbai Electric Supply and Transport Undertaking for Mid Term Review for Truing up of Aggregate Revenue Requirement (ARR) for FY 2015-16 and FY 2016-17, Provisional Truing up of ARR for FY 2017-18 and Revised ARR and Tariff for FY 2018-19 and FY 2019-20**

Coram

**Shri Anand B. Kulkarni, Chairperson**  
**Shri I. M. Bohari, Member**  
**Shri Mukesh Khullar, Member**

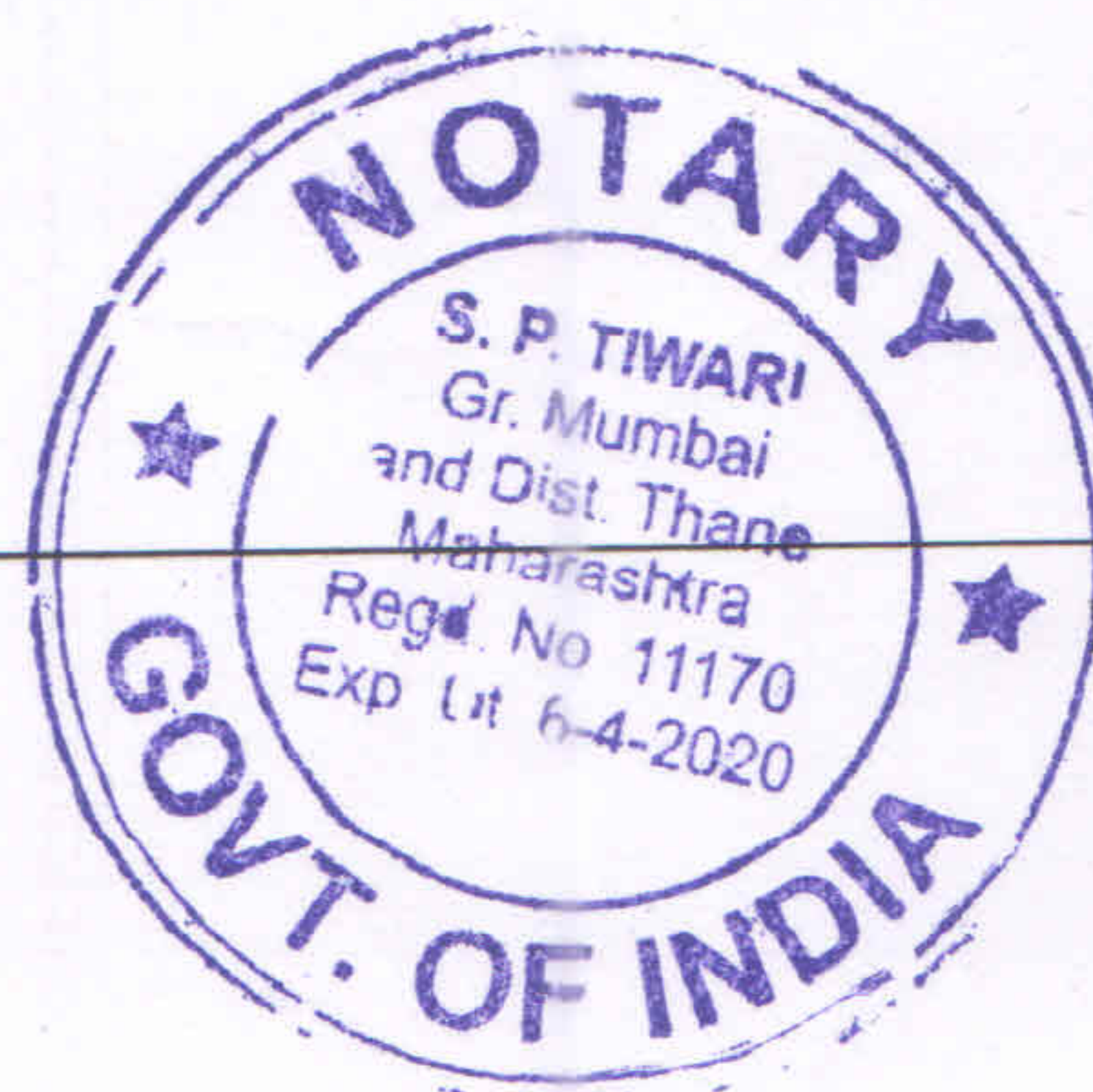
Dated: 12 September, 2018

ORDER

In accordance with Regulation 5 of the Maharashtra Electricity Regulatory Commission (Multi-Year Tariff) Regulations ('MYT Regulations'), 2015, Brihanmumbai Electric Supply and Transport Undertaking (BEST) filed its Mid Term Review Petition for Truing up for FY 2015-16 and FY 2016-17, Provisional Truing up for FY 2017-18 and Revised Aggregate Revenue Requirement (ARR) and Tariff for FY 2018-19 and FY 2019-20. The original Petition was filed on 21 December, 2017 and the revised Petition on 28 June, 2018.

The Petition has been submitted in accordance with the MERC (Multi Year Tariff) Regulations 2011 ("MYT Regulations, 2011"), for Truing-up for FY 2015-16 and in accordance with MERC (Multi Year Tariff) Regulations 2015 ("MYT Regulations, 2015") for Truing-up for FY 2016-17, Provisional Truing-up for FY 2017-18 and revised ARR and Tariff for FY 2018-19 and FY 2019-20.

In exercise of its powers under Sections 86 and 62 (read with Section 61) of the Electricity Act, 2003 and all other powers enabling it in this behalf and after taking into consideration the submissions made by BEST, the public and stakeholders and all other relevant material, the Commission issues the following Order.



**Table 100: Summary of Power Purchase from Short-Term Sources & Imbalance Pool for FY 2016-17 approved by Commission**

Sr. No.	Particulars	MTR Petition			Approved in this Order		
		Quantum (MU)	Total Cost (Rs. Crore)	Rate (Rs./kWh)	Quantum (MU)	Total Cost (Rs. Crore)	Rate (Rs./kWh)
1	Bilateral Power Purchase	658.36	203.44	3.09	658.36	203.44	3.09
2	Pool Imbalances	280.28	6.05	0.22	280.28	6.05	0.22
3	<b>Total</b>	<b>938.64</b>	<b>209.49</b>	<b>2.23</b>	<b>938.64</b>	<b>209.49</b>	<b>2.23</b>

5.4.5 Accordingly, the Commission approves the cost of power purchased from Short-Term Sources and through the Imbalance Pool of Rs. 209.49 Crore on Truing up of ARR for FY 2016-17.

5.4.6 Standby charges:

***BEST's Submission***

5.4.6.1 BEST has paid Rs. 107.10 Crore as standby charges to MSEDCL, as against Rs.107.50 Crore approved in the previous MYT Order. It also purchased 2.19 MU as standby energy during FY 2016-17.

***Commission's Analysis and Ruling***

5.4.7 The Commission has accepted BEST's submissions in this regard and has approved the actual Stand-by Charges of Rs.107.10 Crore in Truing up, as this is in accordance with the relevant Orders in respect of MSEDCL. The Commission has also approved the actual energy purchase of 2.19 MU under the standby mode.

5.4.8 Transmission Charges and MSLDC Charges:

***BEST's Submission***

5.4.8.1 BEST has submitted that the transmission charges and MSLDC charges for FY 2016-17 were Rs. 203.31 Crore and Rs.0.76 Crore respectively.

***Commission's Analysis and Ruling***

5.4.8.2 The Commission has approved the actual Transmission Charges of Rs. 203.31 Crore and MSLDC charges of Rs. 0.76 Crore on Truing up of ARR for FY 2016-17 based on the information available in the Audited Accounts and relevant Orders issued by the Commission.



**Commission's Analysis and Ruling**

6.4.5.3 The Commission sought the details of provisional actual external purchase for FY 2017-18. It is observed that BEST has purchased 568.30 MU under bilateral contracts amounting to Rs. 186.10 Crore at the average rate of Rs. 3.27/kWh. The Commission has gone through the details submitted by BEST and accepted its submissions in this regard. The purchase from Imbalance Pool units have been considered based on MSLDC data regarding the energy drawn by BEST at T<math>\diamond</math>D interface. The break-up of additional power purchase from bilateral contracts and Pool Imbalance purchase as provisionally approved by the Commission is as follows:

**Table 161: Power Purchase from Short-Term Sources and Imbalance Pool for FY 2017-18 approved by Commission**

Sr. No.	Particulars	MTR Petition			Approved in this Order		
		Quantum (MU)	Total Cost (Rs. Crore)	Rate (Rs./kWh)	Quantum (MU)	Total Cost (Rs. Crore)	Rate (Rs./kWh)
1	Bilateral Power Purchase	568.30	186.10	3.27	568.30	186.10	3.27
2	Pool Imbalances	567.88	187.97	3.31	567.88	187.97	3.31
3	<b>Total</b>	<b>1,136.18</b>	<b>374.07</b>	<b>3.29</b>	<b>1,136.18</b>	<b>374.07</b>	<b>3.29</b>

6.4.6 Accordingly, the Commission approves the cost of power purchased from Short-Term Sources and through the Imbalance Pool of Rs. 374.07 Crore on provisional Truing up of ARR for FY 2017-18.

**6.4.7 Transmission Charges and MSLDC Charges****BEST's Submission**

6.4.7.1 BEST has submitted that the transmission charges and MSLDC charges for FY 2017-18 are estimated based on actual monthly charges paid so far during FY 2017-18 and estimated up to March, 2018 at the same rate. The transmission charges are Rs.248.28 Crore and MSLDC charges are Rs.0.80 Crore for FY 2017-18.

**Commission's Analysis and Ruling**

6.4.7.2 Considering BEST's submissions and Transmission Charges approved vide the InSTS Order in Case No. 91 of 2016 dated 22 July, 2016 for FY 2017-18, the Commission has approved actual Transmission Charges of Rs. 248.24 Crore and MSLDC Charges of Rs. 0.80 Crore for the provisional Truing up of FY 2017-18.



Annexure - D



Maharashtra State Electricity Distribution Co. Ltd.  
महाराष्ट्र राज्य विद्युत वितरण कंपनी मर्यादित  
Office of the Director (Commercial)  
'Prakashgad' 6th Floor, Station Road, Bandra (E), Mumbai-400 051.  
Tel.: (P) 26476743 Extn.: 2066, (O) 26474211  
Email: directorcomm@mahadiscom.in • Website : www.mahadiscom.in

Ref: MSEDCL/PP/ 026722

Date: 12 NOV 2018

To  
The Chief Engineer  
Maharashtra State Load Dispatch Centre  
Airoli, Navi Mumbai - 400708

**Sub: Provisional recovery of FBSM bills from Mumbai Utilities**

As you know, majorly MSEDCL's contracted power is being utilized by state Discom/ Utilities in Maharashtra under FBSM settlement as MSEDCL contracted generators are falling at lower place in state MoD stack. As per PPA terms, MSEDCL has to make payment to the generator within 30 days of energy used/ bill raised, however; the energy settlement & payment thereafter from Mumbai Licensees to MSEDCL under FBSM is being done after almost 2 years without any interest. This is causing huge financial loss to MSEDCL.

MSEDCL has already filed a Petition before MERC for redressal of anomalies in FBSM and claimed Rs.4228 Crs from Mumbai Utilities against the settlement of fixed cost including carrying cost of Rs 1128 Cr and differential variable cost including carrying cost of Rs 3110 Cr. till March 2018.

MERC has approved energy settlement under FBSM to Mumbai utilities in their respective MTR Orders for FY 2016-17 and 2017-18 and accordingly, MSEDCL has calculated the provisional estimated amount to be recovered from Mumbai utilities as below:

Particulars		Rinfra-D (AEML)	TPC	BEST
<b>Fixed cost recovery:</b>				
FBSM Units as per MTR for FY 2016-17, Mus	A	808	371	280
Fixed charges payable@Rs.1.37 per unit, Rs Cr	B	111	51	38
FBSM Units as per MTR for FY 2017-18, Mus	C	861	438	568
Fixed charges payable@Rs.1.69 per unit, Rs Cr	D	146	74	96
<b>Variable cost recovery:</b>				
Unsettled FBSM Units for FY 2016-17 Mus	E	256	87	280
Variable charges payable @Rs 3.80 per unit for FY 2016-17, Rs Cr		97	33	11
FBSM Units as per MTR units for FY 2017-18, Mus	F	861	438	568
Variable charges payable @Rs 3.42per unit for FY 2016-18, Rs Cr	H	295	150	194
<b>Total amount payable to MSEDCL, Rs Cr.</b>	<b>B+D + G+H</b>	<b>649</b>	<b>308</b>	<b>339</b>

Note: 1. For FY 2016-17, MSLDC has settled units till Oct 2016.






2. For unsettled imbalance MUs for FY 2016-17 and FY 2017-18, amount payable has been worked out on average purchase rate of MSEDCL from Nashik TPS @Rs. 3.80 and Rs. 3.42 per kwh and the amount as above shall be adjusted over a period of time as and when the 15 min bills are settled.
3. For calculation of fixed cost, MSEDCL's average fixed cost per unit for respective FY is considered.

Hence, it is requested to recover the provisional amount from respective Mumbai Utilities as proposed above and transfer same to MSEDCL till the finalization of FBSM Bills.

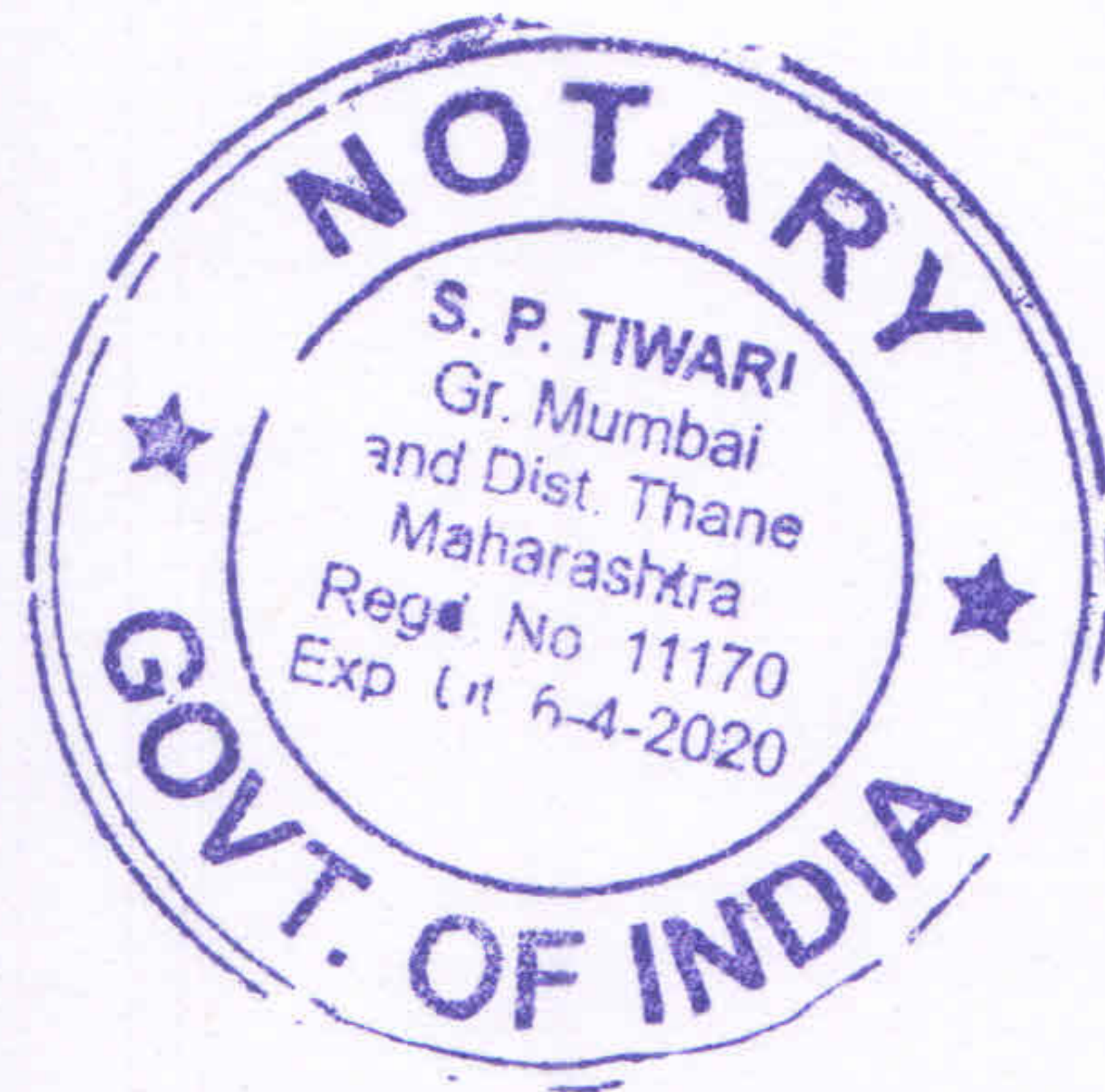
Thanking you,

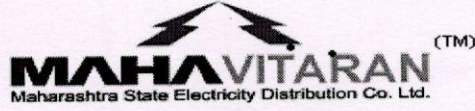


  
(Satish Chavan)  
Director (Commercial)  
MSEDCL

Copy s.w.rs to:-

1. Chairman & Managing Director, MSEDCL, HO, Mumbai
2. Chairman & Managing Director, MSETCL, HO, Mumbai





**Maharashtra State Electricity Distribution Company Limited**  
(A Govt. of Maharashtra Undertaking)  
CIN No.:U 40109MH2005SGC153645

5<sup>th</sup> floor, Prakashgad, Plot No.G-9, Bandra (East), Mumbai – 400 051 ■ (O) 26474211  
Email : cepp@mahadiscom.in Website : www.mahadiscom.in

CE/PP/MSEDCL/Addl Submission/ 297 of 2018/1282

Date: 14.01.2019

To,  
The Secretary,  
Maharashtra Electricity Regulatory Commission  
World Trade Centre,  
Cuffe Parade, Colaba,  
Mumbai- 400 005.

Sub: Petition seeking recovery of annual fixed cost component in respect of MSEDCL for the energy supplied to the State pool, recovery of differential amount to be recovered towards variable rate, removal of anomalies and directions in regards to overdrawl by Mumbai utilities in Balancing and Settlement Mechanism as per provision of ABT Order dated 17.05.2007 in Case No 42 of 2006 in the matter of introduction of Availability Based Tariff Regime at State level within Maharashtra and other related issues  
**-Additional Submission**

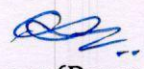
Respected Sir,

This has reference to above cited subject. Please find enclosed herewith MSEDCL's additional submission in Case No. 297 of 2018 in the Petition filed by MSEDCL for seeking recovery of annual fixed cost component in respect of MSEDCL for the energy supplied to the State pool, recovery of differential amount to be recovered towards variable rate, removal of anomalies and directions in regards to overdrawl by Mumbai utilities in Balancing and Settlement Mechanism as per provision of ABT Order dated 17.05.2007 in Case No 42 of 2006 in the matter of introduction of Availability Based Tariff Regime at State level within Maharashtra and other related issues.

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

Thanking You.

Yours faithfully,

  
Chief Engineer (Power Purchase)

**BEFORE THE HON'BLE MAHARASHTRA ELECTRICITY  
REGULATORY COMMISSION, MUMBAI**



FILING NO-

CASE NO- 297 of 2018

IN THE MATTER OF

Additional submission No. 2 in Case No 297 of 2018, seeking recovery of annual fixed cost component in respect of MSEDCL for the energy supplied to the State pool, recovery of differential amount to be recovered towards variable rate, removal of anomalies and directions in regards to overdrawl by Mumbai utilities in Balancing and Settlement Mechanism as per provision of ABT Order dated 17.05.2007 in Case No 42 of 2006 in the matter of introduction of Availability Based Tariff Regime at State level within Maharashtra and other related issues

AND

IN THE MATTER OF

Regulation 94 and 96 of MERC (Conduct of Business) Regulations, 2004

MAHARASHTRA STATE ELECTRICITY DISTRIBUTION COMPANY LTD PETITIONER;

The Chief Engineer (Power Purchase),  
Maharashtra State Electricity Distribution Co. Ltd  
Plot No G-9, Prakashgad, 5th floor, Station Road,  
Bandra (East), Mumbai – 400051  
E-mail : ceppmsedcl@gmail.com

.....PETITIONER

AND

IN THE MATTER OF

Maharashtra State Load Despatch Centre,  
Thane-Belapur Road, P.O. Airoli,  
Navi Mumbai – 400 708

..... RESPONDENT





**AFFIDAVIT ON BEHALF OF PETITIONER (MSEDCL) VERIFYING THE ADDITIONAL SUBMISSION No. 2**

I, SWAPNIL SUHAS KATKAR, aged 39 Years, son of Shri. SUHAS KATKAR, having my office at 5th Floor, Prakashgad, Bandra (East), Mumbai-400051 do solemnly affirm and say as follows:

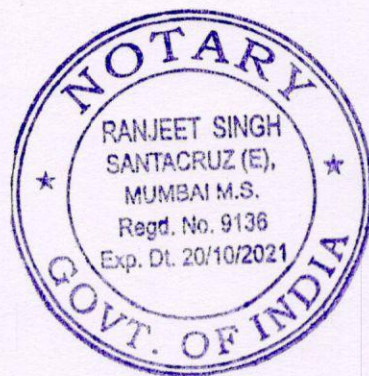
1. I am the Incharge Chief Engineer (Power Purchase) of Maharashtra State Electricity Distribution Co. Ltd., the Review Petitioner in the above matter and am duly authorized competent to make this affidavit.
2. The statements made in paragraphs of the additional submission are true to my knowledge and belief and statements made in paragraphs one to three are based on information and I believe them to be true.
3. I say that there are no proceedings pending in any court of law/ tribunal or arbitrator or any other authority, wherein the Petitioner is a party and where issues arising and/or reliefs sought are identical or similar to the issues arising in the matter pending before the Commission.

Solemnly affirm at Mumbai on this \_\_\_<sup>th</sup> day of January-2019 that the contents of the above affidavit are true to my knowledge, no part of it is false and nothing material has been concealed there from.

Identified before me

Mumbai

Date-

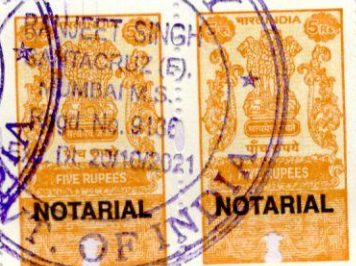
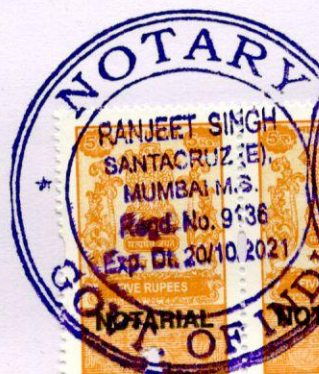
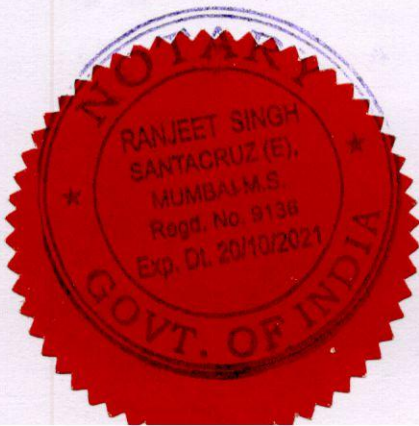


Deponent **BEFORE ME**  
Chief Engineer (Power Purchase)  
M. S. E. D. C. L.

**RANJEET SINGH**  
M.Sc.LL.B.

NOTARY  
MAHARASHTRA  
GOVT. OF INDIA

14 JAN 2019





**BEFORE THE HON'BLE MAHARASHTRA ELECTRICITY  
REGULATORY COMMISSION, MUMBAI**

Filing No

Case No. 297 of 2018

**IN THE MATTER OF**

Petition seeking recovery of annual fixed cost component in respect of MSEDCL for the energy supplied to the State pool, recovery of differential amount to be recovered towards variable rate, removal of anomalies and directions in regards to overdrawl by Mumbai utilities in Balancing and Settlement Mechanism as per provision of ABT Order dated 17.05.2007 in Case No 42 of 2006 in the matter of introduction of Availability Based Tariff Regime at State level within Maharashtra and other related issues.

**AND**

**IN THE MATTER OF**

Regulation 94 and 96 of MERC (Conduct of Business) Regulations, 2004

**IN THE MATTER OF:**

Maharashtra State Electricity Distribution Company Limited  
5th Floor, Prakashgad,  
Plot No. G-9, Bandra (East),  
Mumbai – 400051

**... PETITIONER**

**VERSUS**

Maharashtra State Load Despatch Centre,  
Thane-Belapur Road, P.O. Airoli,  
Navi Mumbai – 400 708

**... RESPONDENT**

**Additional Submission No. 2 on behalf of Petitioner- MSEDCL**

1. MSEDCL most humbly submits that MSEDCL vide its letter dated 16.10.2018 has filed a petition for Petition seeking recovery of annual fixed cost component in



respect of MSEDCL for the energy supplied to the State pool, recovery of differential amount to be recovered towards variable rate, removal of anomalies and directions in regards to overdrawl by Mumbai utilities in Balancing and Settlement Mechanism as per provision of ABT Order dated 17.05.2007 in Case No 42 of 2006 in the matter of introduction of Availability Based Tariff Regime at State level within Maharashtra and other related issues.

2. MSEDCL humbly submits that the existing energy Balancing and Settlement Mechanism in the state has not been fully implemented as per the guidelines issued in Hon'ble Commission's order dated 17.05.2007.
3. MSEDCL humbly submits that as per clause 4.3.2 of ABT order dated 17.05.2007,

**4.3.2 Annual Fixed Cost Settlement**

*(a) For the purposes of settlement of capacity exchanges amongst State Pool Participants, the MSLDC-CD shall work out the Fixed Cost Reconciliation (FCR) Pool volume comprising 'FCR Pool Increments' and 'FCR Pool Decrements' by each State Pool Participant corresponding to each trading period in accordance with the principles outlined hereunder.*

....

....

*(j) Based on 'FCR Pool Increments' and 'FCR Pool Decrements' and the 'FCR Pool Price' (to be determined in accordance with the principles outlined above), the 'FCR Pool Amount Payable' and 'FCR Pool Amount Receivable' in respect of each State Pool Participant corresponding to each trading period shall be determined.*

*(k) The aggregate of 'FCR Pool Amount Payable' and 'FCR Pool Amount Receivable' corresponding to each trading period over the period of one fiscal year in respect of each State Pool Participant shall form the basis for 'Net FCR Pool Amount Payable' or 'Net FCR Pool Amount Receivable' by the respective State Pool Participant for that fiscal year.*

*(l) For the purposes of the annual fixed cost settlement amongst the State Pool Participants, the 'annual period' shall be referred to as the 'fiscal year'.*

4. Thus, the annual fixed cost reconciliation is an integral part of ABT Order dated 17.05.2007 and it is crystal clear that fixed cost reconciliation has to be done in the FBSM mechanism as decided by the Hon'ble Commission. However, Hon'ble Commission's order dated 17.05.2007 has not been fully implemented by MSLDC and the implementation of the same has been done partially. MSLDC has been doing the energy balancing and settlement for variable component only and fixed cost settlement has been kept pending, raising certain difficulties in implementation.



5. MSEDCL submits that Hon'ble Commission in its Order dated 11.04.2014 in the matter of removal of difficulties in operation of FBSM in Case No 56 of 2012, has nowhere stated that Annual fixed cost reconciliation for the past period i.e. before implementation of frequency linked balancing and settlement mechanism need not be done. But it has categorically mentioned that *the issue related to FCR becomes redundant when the frequency linked balancing and settlement mechanism is being envisaged to be implemented*. As the present balancing and settlement mechanism is "*weighted averaged system marginal based*" and not "*frequency linked*", hence the Hon'ble Commission's order dated 11.04.2014 has been wrongly interpreted by MSLDC which has resulted into revenue loss to MSEDCL in respect of its annual fixed cost as envisaged in ABT order dated 17.05.2007.
6. The Maharashtra State Power Committee (MSPC) has been established with core function of monitoring compliance of Balancing and Settlement Code by the State Pool Participants and resolve complaints/disputes amongst the State Pool Participants. However, MSPC did not resolve the issue of Fixed Cost Reconciliation and continued the settlement for variable component only.
7. MSEDCL had raised the issue of annual fixed cost reconciliation in various MSPC meetings. However, MSPC kept on replying that the issue will be solved after implementation of Frequency Linked Deviation Settlement Mechanism and the same is not implemented till date.
8. MSLDC, in its reply dated 20.12.2018 in the present Petition, has mentioned the minutes of 22<sup>nd</sup> MSPC meeting held on 8<sup>th</sup> February 2017 wherein **then MSPC Chairman has opined not to add agenda item about FCR in any forthcoming MSPC meeting till any directives issued by Hon'ble MERC in this regard**. It means that the coordination forum to discuss issues related to FBSM is not in position to resolve the issue and the MSPC forum avenue is closed for "Annual Fixed cost reconciliation" which is an integral part of ABT Order dated 17.05.2007. It may be seen that MSPC has left this issue to Hon'ble Commission for its directives. In fact, there are no orders by Hon'ble Commission for denial of



payment on account of Fixed Cost Reconciliation as envisaged in the ABT order dated 17.05.2007. However, the same is kept pending sighting certain difficulties and MSLDC even not bothered to take up the issue to Hon'ble Commission under removal of difficulties and not proposed any mechanism for recovery of same. Because of this, MSEDCL has been deprived of its legitimate claim of Fixed Cost Recovery on account of capacity exchanges between state pool participants.

9. Hence the issue of annual fixed cost reconciliation is required to be addressed otherwise MSEDCL will be deprived of receiving its annual fixed cost, for capacity utilisation by Mumbai utilities, as envisaged in ABT order dated 17.05.2007. This will ultimately burden MSEDCL consumers through the tariff.
10. MSEDCL humbly submits that regarding preparation of monthly state energy account report, MSLDC in its reply dated 20.12.2018 has stated that **preparation of the monthly state energy account report is the additional demand of MSEDCL only**. MSEDCL would like to bring to Hon'ble Commission's notice that it was not only MSEDCL's demand but RInfra-D was also demanding for the monthly state energy account report. The recording of proceedings of 22<sup>nd</sup> MSPC meeting regarding monthly state energy account report is reproduced as below:

***Monthly State Energy Account (SEA)***

*MSLDC informed that MSEDCL has raised the issue of preparation of Monthly State Energy Account in various MSPC meeting. During MSPC subcommittee meeting held on 26.07.2016, MSEDCL & R-Infra stated that the monthly state energy account may be prepared manually if existing software has limitations as these reports are beneficial for verification & for Internal Audit purpose.*

*MSLDC informed that SLDC's IT team is working on the macro/ software for preparation of monthly State Energy Account and very soon the SEA shall be issued by SLDC to all utilities.*

11. MSEDCL humbly submits that provisions of section 32 of Electricity Act 2003 are as follows:

32. ....

*(2) The State Load Despatch Centre shall -*

*(a) be responsible for optimum scheduling and despatch of electricity within*



- a State, in accordance with the contracts entered into with the licensees or the generating companies operating in that State;*
- (b) monitor grid operations;*
- (c) keep accounts of the quantity of electricity transmitted through the State grid;*

According to the provisions, it is MSLDC's responsibility to keep accounts of the quantity of electricity transmitted through the state grid and so to prepare the monthly state energy account report.

12. MSEDCL humbly submits that Koyna generation is exclusively contracted with MSEDCL and cost of the same is considered in MSEDCL ARR. Despite several communications with MSLDC, it was observed that Koyna generation is used to control state / and particularly Mumbai overdrawl. MSEDCL in its submission dated 16.10.2018 has already pointed out this to Hon'ble Commission. It may be noted that MSEDCL optimally utilise Koyna generation exclusively in peak hour, high demand period and when there is coal shortage. MSEDCL do not get compensated at appropriate rate for its contracted Koyna generation when it is used to control state / Mumbai overdrawl or for system stability.

13. MSLDC in its reply dated 20.12.2018 has stated that

.....

*Demand pattern of Maharashtra is very dynamic and there are continuous variations in demand and peak to off-peak variation is of the order of 6000 MW. MSLDC has to operate the least cost and fast responding generation available within the state to remain within DSM limit specified in IIEGGC and its time to time amendments. ....*

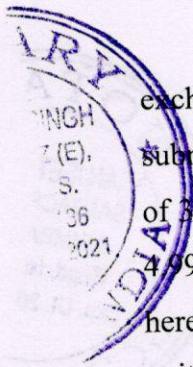
MSEDCL submits that MSLDC may ask all utilities including Mumbai utilities for alternate power arrangement / peaking generation availability to match its short fall of power rather than utilising MSEDCL's contracted and least cost generation like Koyna for matching state load generation balance.

14. MSLDC in its reply has mentioned the letter dated 23.10.2018 from MSEDCL regarding use of Koyna hydro by SLDC for overdrawl by Mumbai Discoms and stated that 'such type of correspondence creates hurdles and limits the functions of

MSLDC as a system operator envisaged in EA Act, 2003' and the same is not correct.



15. MSEDCL submits that MSEDCL reserves its right to safeguard its interest for utilisation of its contracted generation especially Koyna. MSEDCL in its letter dated 23.10.2018 has pointed out to MSETCL that MSEDCL is trying its best to save Koyna water to meet out demand in peak demand months i.e. Apr-19 & May-19 and even MSEDCL has opted to load shedding for certain period. MSEDCL has informed about the monthwise overdrawl by Mumbai Discoms and use of Koyna at the same time by MSLDC for the period Jun 2018 to Oct 2018. MSEDCL even pointed out to MSLDC regarding sale of power from TPC-D in power market during evening peak period in the months of Jun 2018 to Sep 2018 when it had no surplus power for sale of such power. Also the issue of overdrawl by Mumbai based on Lodestar was also communicated by Load Management Cell, MSEDCL, Kalwa to MSLDC. But despite this, MSLDC has not initiated any action to restrict Mumbai Discom from overdrawl and instead kept on using Koyna Hydro for state load generation balancing. The notices issued by MSEDCL to MSLDC are attached herewith as **Annexure-A(I) to A(XXI)**.
16. Also, MSEDCL has requested MSETCL to instruct MSLDC to develop mechanism to monitor Mumbai Discom overdrawl based on its actual available generation and demand in real time operation vide letter dated 23.10.2018 and the same is attached herewith for ready reference as **Annexure B**.
17. Thus MSEDCL, vide letter dated 23.10.2018, has only pointed out these issues to MSETCL / MSLDC which are the part of MSLDC's responsibilities as per section 32 of Electricity Act, 2003 and has not created any hurdle or limited the functionality of MSLDC.
18. MSEDCL, in its petition dated 16.10.2018, has already pointed out that the underdrawing utility for its underdrawl gets paid at its System Marginal Price (SMP) which considers energy purchase from its intra-state marginal stations (above technical minimum) and energy above 70 % contracted quantum of short term bilateral power purchase only. But, the rate of power purchased in the power



exchange by utility is not considered in determination of SMP. MSEDCL hereby submits that MSEDCL has purchased 4019.70 MUs in FY 2017-18 at average rate of 7.72 Rs/unit and 5328 MUs in FY 2018-19 till December 2018 at average rate of 4.99 Rs/unit from energy exchange. Statement showing the same is attached herewith as **Annexure C**. The rates for the power purchased from the exchange are quite higher as compared to the rates considered for determination of SMP as per laid down principles.

19. The energy overdrawn by Mumbai utilities, as per DSR reports, in the state pool from September 2017 to December 2018 is shown in **Annexure – D(I) to D(VI)**. As the rates of power purchase from exchange is not considered in system marginal price of the underdrawing utility, the SMP of such utility does not reflect the correct price which ultimately results in under recovery in variable charges of the underdrawing utility.
20. MSEDCL submits that the rates of power exchange are very fluctuating. When demand goes high, power exchange rates rises considerably. At such times, it is observed that Mumbai utilities overdraw from the state grid rather than purchasing power from power exchange. MSEDCL procure power from exchange irrespective of high rates to meet its load generation balance and to avoid load shedding. MSEDCL has procured power from power exchange of 920.09 MUs and 1375.67 MUs at the average rates of Rs. 5.28 and Rs 6.11 per unit in the months of September 2018 & October 2018 respectively as indicated in **Annexure C** attached herewith. But Mumbai utilities have been observed to draw power from the state grid at the weighted average system marginal price which is much less than the power exchange rate. Mumbai utilities have overdrawn power of 53.055 MUs and 102.695 MUs from the state grid in the months of September 2018 & October 2018 respectively, as per DSR report and as shown in **Annexure D (V)** when MSEDCL was purchasing power from exchange. Such act of overdrawing of power from the state grid rather than arranging power from any alternate arrangement is unfair and is construed as gaming.
21. Hon'ble Commission in its daily order dated 21.12.2018 in Case No 297 of 2018 has directed MSLDC as follows;




*“to settle MSEDCL demand of Rs989.41 Cr by working out provisional recovery of variable cost in FBSM pool for FY 2016-17 and FY 2017-18 from Mumbai utilities pending final settlement of FBSM bills in due course. As the Mumbai Utilities have already recovered the imbalance power purchase cost from their consumers they would be required to pay the provisional amount to MSEDCL, as worked out and so apportioned by MSLDC”.*

22. MSEDCL submits that Hon'ble commission in the daily order has rightly held that as the Mumbai Utilities have already recovered the imbalance power purchase cost from their consumers, they would be required to pay the provisional amount to MSEDCL. However, MSLDC vide letter dated 27.12.2018 has issued the provisional bill of variable cost of FBSM pool for FY 2017-18 only from Mumbai utilities and stated that MSLDC will be in position to complete upto March 2017 FBSM bills by January 2019. The copy of the letter is attached herewith as **Annexure E**.
23. Thus MSLDC has only partially complied the directives as per the daily order of the Hon'ble commission and deprived MSEDCL from recovery of balance variable cost pertaining to FY 2016-17.
24. MSEDCL hereby submits that the similar issue is continued in the current financial year FY 2018-19 also. The Mumbai utilities are overdrawing from the State pool from April 2018 till date. The overdrawal by Mumbai Utilities as per DSR report for the period April 2018 to December 2018 is 1139.89 MUs and the same is indicated in **Annexure D(III) to D(VI)** attached herewith. Further, the Mumbai utilities are recovering tariff from their consumers during FY 2018-19 as determined by Hon'ble Commission and they have not compensated the imbalance power purchase cost to MSEDCL in the Current financial year.
25. MSEDCL therefore humbly request Hon'ble Commission to direct MSLDC to settle the issue of provisional recovery of variable cost in FBSM pool for FY 2018-19 also on ad-hoc basis on similar ground of FY 2016-17 and FY 2017-18 and

direct MSLDC to pass on the amount receivable to MSEDCL for FY 2018-19 on immediate basis.

26. MSEDCL humbly requests Hon'ble Commission to take the above additional Submission on record and consider the same while deciding the present matter.

  
Chief Engineer (Power Purchase)

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

8/7/2018

Annexure A(I)  
Gmail - Not of use Koyna Hydro to control overdrwal of Mumbai DISCOM

 Gmail

Supritendent Engineer LM Section <selmkalwa@gmail.com>

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**Not of use Koyna Hydro to control overdrwal of Mumbai DISCOM**

---

SF-LMCell Kalwa <selmkalwa@gmail.com>

Mon, Sep 11, 2017 at 9:55 AM

To: scheduling <scheduling@mahasldc.in>, "scheduling.sldc" <scheduling.sldc@gmail.com>, "cesldc@mahasldc.in" <cesldc@mahasldc.in>  
Cc: Chief Engineer PP <ceppmsedcl@gmail.com>, ED COMM Mahadiscom <edcomm@mahadiscom.in>, EDCOMM <edcomm@gmail.com>, abhijitd2002 <abhijitd2002@yahoo.com>

Respected Sir


Please find attached herewith UI data of Mumbai Discom derived from SLDC DSR. It is seen from said UI data that most of time there is overdrawal by Mumbai Discom. Even though there was overdrawal of power from Mumbai Utility, its Hydro was not sufficiently pick up to control its overdrawal and SLDC has use Koyna Generation to control Overdrwal. Presently Overdrawal by TPC Is 49MW & BEST is 154 MW and inspite of instruction from SLDC, Mumbai Hydor is not pick up. & same is mainatned at 243 MW.

Hence it is requested to verify the overdrawl by mUmbai Discoms and not to use MSEDCL Koyna Hydro Generation to control Mumbai Overdrawal.

Regards

--  
Load Management Cell,  
MSEDCL, Old SLDC Building,  
Power House, Sector-1, Airoli,  
Navi Mumbai -400708  
Control Room Mobil No: 9833383880  
Control Room Fax No: 022-27602220

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 **Mumbai UI\_01.09.17\_30.09.17 as per DSR.xls**  
233K

ANNEX - A (II)

Gmail - Not of use Koyna Hydro to control overdrwal of Mumbai DISCOM

Supritendent Engineer LM Section <selmkalwa@gmail.com>

8/7/2018



Not of use Koyna Hydro to control overdrwal of Mumbai DISCOM

1 message

Thu, Sep 7, 2017 at 11:55 AM


SE LMC Cell Kalwa <selmkalwa@gmail.com>  
To: scheduling <scheduling@mahasldc.in>, "scheduling.sldc" <scheduling.sldc@gmail.com>, "cesldc@mahasldc.in" <cesldc@mahasldc.in>  
Cc: Chief Engineer PP <ceppmsedcl@gmail.com>, ED COMM Mahadiscom <edcomm@mahadiscom.in>, EDCOMM <edcomm@gmail.com>, abhijitd2002 <abhijitd2002@yahoo.com>

Respected Sir

Please find attached herewith UI data of Mumbai Discom derived from SLDC DSR. It is seen from said UI data that most of time there is overdrawl by Mumbai Discom. Even though there was overdrawl of power from Mumbai Utility, its Hydro was not sufficiently pick up to control its overdrawl and SLDC has use Koyna Generation to control Overdrwal.  
Hence it is requested to verify the overdrawl by mUmbai Discoms and not to use MSEDCL Koyna Hydro Generation to control Mumbai Overdrawl.

Regards

Load Management Cell,  
MSEDCL, Old SLDC Building,  
Power House, Sector-1, Airoli,  
Navi Mumbai -400708  
Control Room Mobil No: 9833383880  
Control Room Fax No: 022-27602220

 Mumbai UI\_01.09.17\_06.09.17 as per DSR.xls  
201K

8/7/2018



Annex - A (III)

Gmail - Not to use Koyna Hydro to control overdrawl of Mumbai DISCOM

Supritendent Engineer LM Section <selmkalwa@gmail.com>

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**Not to use Koyna Hydro to control overdrawl of Mumbai DISCOM**

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SE LMCCell Kalwa <selmkalwa@gmail.com>

Tue, Sep 12, 2017 at 9:55 AM

To: scheduling <scheduling@mahasldc.in>, "scheduling.sldc" <scheduling.sldc@gmail.com>, "cesldc@mahasldc.in" <cesldc@mahasldc.in>  
Cc: Chief Engineer PP <ceppmsedcl@gmail.com>, ED COMM Mahadiscom <edcomm@mahadiscom.in>, EDCOMM <edcomm@gmail.com>, abhijitd2002 <abhijitd2002@yahoo.com>

Respected Sir

Please find attached herewith UI data of Mumbai Discom derived from SLDC DSR for Sep-17. It is seen from said UI data that most of time there is overdrawl by Mumbai Discom. Even though there was overdrawl of power from Mumbai Utility, its Hydro was not sufficiently pick up to control its overdrawl and SLDC has used Koyna Generation to control Overdrawl to match state LGB. Hence it is requested to verify the overdrawl by Mumbai Discoms and not to use MSEDCL Koyna Hydro Generation to control Mumbai Overdrawl.

Regards

--  
Load Management Cell,  
MSEDCL, Old SLDC Building,  
Power House, Sector-1, Airoli,  
Navi Mumbai -400708  
Control Room Mobil No: 9833383880  
Control Room Fax No: 022-27602220



**Mumbai UI for Sep-17.xls**  
121K

8/7/2018

Gmail - Regarding continuous Overdrawl by Mumbai DISCOM for Dt. 10.05.2018



DEEPT SINGH  
MUMBAI M.S.  
Id. No. 9136

Annea A (iv)

Supritendent Engineer LM Section <selmkalwa@gmail.com>

**Regarding continuous Overdrawl by Mumbai DISCOM for Dt. 10.05.2018**

1 message

SE LMCell Kalwa <selmkalwa@gmail.com>

Thu, May 10, 2018 at 12:26 PM

To: scheduling <scheduling@mahasldc.in>, " cesldc@mahasldc.in" <cesldc@mahasldc.in>

Cc: Chief Engineer <ceppmsedcl@gmail.com>, Satish Chavan <directorcommsedcl@gmail.com>, abhijitd2002 <abhijitd2002@yahoo.com>

Respected Sir

This is continuation to this office previous email. As per schedule available in LODSTAR scheduling software, Mumbai exchange is presently 1447 MW whereas drawal is 1655MW I.e There is overdrawl of almost 200 MW. The overdrawl is continue since morning. It is requested to verify Mumbai Discom Overdrawl, not to use Koyna Hydro to control overdrawl of Mumbai Discom if any or ask Mumbai Discom to make alternat power arrangement.

Regards

----- Forwarded message -----

From: SE LMCell Kalwa <selmkalwa@gmail.com>

Date: Thu, May 10, 2018 at 11:15 AM

Subject: Regarding Overdrawl by Mumbai DISCOM for Dt. 10.05.2018

To: scheduling <scheduling@mahasldc.in>, " cesldc@mahasldc.in" <cesldc@mahasldc.in>

Cc: Chief Engineer <ceppmsedcl@gmail.com>, Satish Chavan <directorcommsedcl@gmail.com>, abhijitd2002 <abhijitd2002@yahoo.com>

Dear Sir,

In view of present power scenario, For Dt. 10.05.2018, as per Mumbai Discom Exchange in Lodestar Schedule including BRBCL power ( attached for your ready reference) , there is overdraw by Mumbai Discom . For block No.45 there is overdrawl of 238 .It is requested to verify Mumbai Discom Overdrawl, not to use Koyna Hydro to control overdrawl of Mumbai Discom if any or ask Mumbai Discom to make alternat power arrangement.

Regards

--  
Load Management Cell,  
MSEDCL,Old SLDC Building,  
Power House, Sector-1, Airoli,  
Navi Mumbai -400708  
Control Room Mobil No: 9833383880  
Control Room Fax No: 022-27602220

--  
Load Management Cell,  
MSEDCL,Old SLDC Building,  
Power House, Sector-1, Airoli,  
Navi Mumbai -400708  
Control Room Mobil No: 9833383880  
Control Room Fax No: 022-27602220

8/7/2018

Gmail - Regarding continuous Overdraw by Mumbai DISCOM for Dt. 10.05.2018



10-05-18.xlsx  
206K

8/7/2018

Gmail - Regarding overdrawal by Mumbai DISCOM

ANNEK A(V)

Supritendent Engineer LM Section <selmkalwa@gmail.com>



Gmail

3136  
7/7/2021

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**Regarding overdrawal by Mumbai DISCOM**

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Fri, Jan 5, 2018 at 7:58 AM

SE LMCell Kalwa <selmkalwa@gmail.com>  
To: scheduling <scheduling@mahasldc.in>, "cesldc@mahasldc.in" <cesldc@mahasldc.in>

Dear Sir,

Tata Unit-8 (250MW) is tripped at 05:52Hrs. There is continuous overdrawal by Mumbai Discom & there is still there is margin left in Mumbai Discom Hydro. There is continuous overdrawal since morning by Mumbai Discom as per Scada screen. It is requested to verify Mumbai Discom Overdrawal & control overdrawal also requested not to use Koyna Hydro to control overdrawal of Mumbai Discom since there is unnecessary financial burden imposed on MSEDCL.

Regards,

--  
Load Management Cell,  
MSEDCL, Old SLDC Building,  
Power House, Sector-1, Airoli,  
Navi Mumbai -400708  
Control Room Mobil No: 9833383880  
Control Room Fax No: 022-27602220



8/7/2018



Gmail

ET SINGH  
CRUZ (E),  
No. 9138  
20/10/2021

Gmail - Regarding Overdrawl by Mumbai DISCOM

Annex - A (v)

Supritendent Engineer LM Section <selmkalwa@gmail.com>

**Regarding Overdrawl by Mumbai DISCOM**

1 message

Sat, Jan 6, 2018 at 9:30 AM

SE LMCell Kalwa <selmkalwa@gmail.com>  
To: " cesldc@mahasldc.in" <cesldc@mahasldc.in>, scheduling <scheduling@mahasldc.in>  
Cc: Chief Engineer <ceppmsedcl@gmail.com>, edcomm <edcommho@gmail.com>

Dear Sir,

As per present power scenerio, Tata Unit-8 (250MW) was under forced outage from Dt. 05-01-2018 and REL U-2 is w/dn on AOH at 00:46 hrs of Dt. 06-01-2018 . There is continous overdrwal since morning by Mumbai Discom as per Scada screen. It is requested to verify Mumbai Discom Overdrawl & control overdrawl also requested not ot use Koyna Hydro to control overdrawl of Mumbai Discom since there is unnecessary financial burden imposed on MSEDCL.

Regards,


--  
Load Management Cell,  
MSEDCL, Old SLDC Building,  
Power House, Sector-1, Airoli,  
Navi Mumbai -400708  
Control Room Mobil No: 9833383880  
Control Room Fax No: 022-27602220

8/7/2018

Gmail - Regarding Overdrawl by Mumbai DISCOM

Annex - A (VII)

Supritendent Engineer LM Section <selmkalwa@gmail.com>

 Gmail

**Regarding Overdrawl by Mumbai DISCOM**

2 messages

Wed, Jan 10, 2018 at 8:55 AM

SE LMCell Kalwa <selmkalwa@gmail.com>  
To: "cesldc@mahasldc.in" <cesldc@mahasldc.in>, scheduling <scheduling@mahasldc.in>  
Cc: Chief Engineer <ceppmsedcl@gmail.com>, edcomm <edcommho@gmail.com>

Respected Sir,

Tata Unit-8 (250MW) was under forced outage from Dt. 05-01-2018 and TPC U-5 & REL U-2 were w/dn on AOH . Also it is learnt that, TPC U-7A & 7B are tripped at 08:30 hrs of Dt. 10-01-2018. As per present power scenerio, It is requested to verify Mumbai Discom Overdrawl & also requested not ot use Koyna Hydro to control overdrawl of Mumbai Discom since there is unnecessary financial burden imposed on MSEDCL.

Regards,

--  
Load Management Cell,  
MSEDCL, Old SLDC Building,  
Power House, Sector-1, Airoli,  
Navi Mumbai -400708  
Control Room Mobil No: 9833383880  
Control Room Fax No: 022-27602220

Wed, Jan 10, 2018 at 9:27 AM

SE LMCell Kalwa <selmkalwa@gmail.com>  
To: MPMG BEST <powermanagement.best@gmail.com>

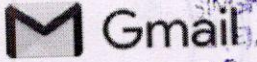
[Quoted text hidden]

8/7/2018

Gmail - Regarding Overdrawl by Mumbai DISCOM

Annex A (VIII)

Supritendent Engineer LM Section <selmkalwa@gmail.com>



**Regarding Overdrawl by Mumbai DISCOM**

2 messages

Wed, Jan 10, 2018 at 8:55 AM

SE LMCell Kalwa <selmkalwa@gmail.com>  
To: "cesldc@mahasldc.in" <cesldc@mahasldc.in>, scheduling <scheduling@mahasldc.in>  
Cc: Chief Engineer <ceppmsedcl@gmail.com>, edcomm <edcommho@gmail.com>

Respected Sir,

Tata Unit-8 (250MW) was under forced outage from Dt. 05-01-2018 and TPC U-5 & REL U-2 were w/dn on AOH . Also it is learnt that, TPC U-7A & 7B are tripped at 08:30 hrs of Dt. 10-01-2018. As per present power scenerio, It is requested to verify Mumbai Discom Overdrawl & also requested not ot use Koyna Hydro to control overdrawl of Mumbai Discom since there is unnecessary financial burden imposed on MSEDCL.

Regards,

—  
Load Management Cell,  
MSEDCL, Old SLDC Building,  
Power House, Sector-1, Airoli,  
Navi Mumbai -400708  
Control Room Mobil No: 9833383880  
Control Room Fax No: 022-27602220

Wed, Jan 10, 2018 at 9:27 AM

SE LMCell Kalwa <selmkalwa@gmail.com>  
To: MPMG BEST <powermanagement.best@gmail.com>

[Quoted text hidden]

8/7/2018

Gmail - Regarding Overdrawl by Mumbai DISCOM for Dt. 13-01-2018

Annex A (IX)

Supritendent Engineer LM Section <selmkalwa@gmail.com>



**Regarding Overdrawl by Mumbai DISCOM for Dt. 13-01-2018**

2 messages

Sat, Jan 13, 2018 at 9:39 AM

SE LMCell Kalwa <selmkalwa@gmail.com>  
To: " cesldc@mahasldc.in" <cesldc@mahasldc.in>, scheduling <scheduling@mahasldc.in>, Chief Engineer <ceppmsedcl@gmail.com>, edcomm <edcommho@gmail.com>  
Cc: abhijitd2002 <abhijitd2002@yahoo.com>

Dear Sir,

As per present power scenerio, Tata Unit-8 (250MW) was under forced outage from Dt. 05-01-2018 and REL U-2(250MW) & TPC U-5(500 MW) are withdrawn on AOH . For Dt. 13-01-2018, as per Mumbai Discom Exchange in Lodestar Schedule ( attached for your ready refernce) , there is continuos overdrwal since morning by Mumbai Discom. It is requested to verify Mumbai Discom Overdrawl & also requested not ot use Koyna Hydro to control overdrawl of Mumbai Discom since there is unnecessary financial burden imposed on MSEDCL.

Regards,

--  
Load Management Cell,  
MSEDCL,Old SLDC Building,  
Power House, Sector-1, Airoli.  
Navi Mumbai -400708  
Control Room Mobil No: 9833383880  
Control Room Fax No: 022-27602220

13-01-2018.xlsx  
115K

Sat, Jan 13, 2018 at 2:13 PM

SE LMCell Kalwa <selmkalwa@gmail.com>  
To: " cesldc@mahasldc.in" <cesldc@mahasldc.in>, scheduling <scheduling@mahasldc.in>

[Quoted text hidden]


13-01-2018.xlsx  
115K

8/7/2018

Gmail - Regarding Overdrawl by Mumbai DISCOM for Dt. 14-01-2018

Annex-A (X)

Supritendent Engineer LM Section <selmkalwa@gmail.com>

 Gmail

Regarding Overdrawl by Mumbai DISCOM for Dt. 14-01-2018

Sun, Jan 14, 2018 at 11:42 AM


SE LMCell Kalwa <selmkalwa@gmail.com>  
To: "cesldc@mahasldc.in" <cesldc@mahasldc.in>, scheduling <scheduling@mahasldc.in>, Chief Engineer <ceppmsedcl@gmail.com>, edcomm <edcommho@gmail.com>  
Cc: abhijitd2002 <abhijitd2002@yahoo.com>

Dear Sir,

As per present power scenerio, Tata Unit-8 (250MW) was under forced outage from Dt. 05-01-2018 and REL U-2(250MW) & TPC U-5(500 MW) are withdrawn on AOH . For Dt. 14-01-2018, as per Mumbai Discom Exchange in Lodestar Schedule ( attached for your ready refernce) , there is continous overdrwal since morning by Mumbai Discom. It is requested to verify Mumbai Discom Overdrawl & also requested not ot use Koyna Hydro to control overdrawl of Mumbai Discom since there is unnecessary financial burden imposed on MSEDCL.

Regards,

--  
Load Management Cell,  
MSEDCL, Old SLDC Building,  
Power House, Sector-1, Airoli,  
Navi Mumbai -400708  
Control Room Mobil No: 9833383880  
Control Room Fax No: 022-27602220


 14-01-2018.xlsx  
118K

8/7/2018

Gmail - Regarding Overdrawl by Mumbai DISCOM for Dt. 16-01-2018

Annex - ACXII

Supritendent Engineer LM Section <selmkalwa@gmail.com>

 Gmail

**Regarding Overdrawl by Mumbai DISCOM for Dt. 16-01-2018**

1 message

Tue, Jan 16, 2018 at 10:30 AM


SE LMCell Kalwa <selmkalwa@gmail.com>  
To: "cesldc@mahasldc.in" <cesldc@mahasldc.in>, scheduling <scheduling@mahasldc.in>  
Cc: Chief Engineer <ceppmsedcl@gmail.com>, edcomm <edcommho@gmail.com>

Dear Sir,

As per present power scenerio, REL U-2(250MW) & TPC U-5(500 MW) are withdrawn on AOH . For Dt. 16-01-2018, as per Mumbai Discom Exchange in Lodestar Schedule ( attached for your ready refernce) , there is continuos overdrwal since morning by Mumbai Discom. It is requested to verify Mumbai Discom Overdrawl & also requested not ot use Koyna Hydro to control overdrawl of Mumbai Discom since there is unnecessary financial burden imposed on MSEDCL.

Regards,

--  
Load Management Cell,  
MSEDCL, Old SLDC Building,  
Power House, Sector-1, Airoli,  
Navi Mumbai -400708  
Control Room Mobil No: 9833383880  
Control Room Fax No: 022-27602220


 16-01-2018.xlsx  
118K

8/7/2018

Gmail - Regarding Overdrawl by Mumbai DISCOM for Dt. 19-01-2018

Annex-A (XII)

Supritendent Engineer LM Section <selmkalwa@gmail.com>

 Gmail

**Regarding Overdrawl by Mumbai DISCOM for Dt. 19-01-2018**

1 message

Fri, Jan 19, 2018 at 10:52 AM

SE LMCell Kalwa <selmkalwa@gmail.com>  
To: "cesldc@mahasldc.in" <cesldc@mahasldc.in>, scheduling <scheduling@mahasldc.in>  
Cc: Chief Engineer <ceppmsedcl@gmail.com>, edcomm <edcommho@gmail.com>

Dear Sir,

As per present power scenerio, REL U-2(250MW) & TPC U-5(500 MW) are withdrawn on AOH . For Dt. 19-01-2018, as per Mumbai Discom Exchange in Lodestar Schedule ( attached for your ready refernce) , there is continuos overdrwal since morning by Mumbai Discom. It is requested to verify Mumbai Discom Overdrawl & also requested not ot use Koyna Hydro to control overdrawl of Mumbai Discom since there is unnecessary financial burden imposed on MSEDCL.

Regards,

—  
Load Management Cell,  
MSEDCL, Old SLDC Building,  
Power House, Sector-1, Airoli,  
Navi Mumbai -400708  
Control Room Mobil No: 9833383880  
Control Room Fax No: 022-27602220



19-01-2018.xlsx  
120K

8/7/2018

Gmail - Regarding Overdrawl by Mumbai DISCOM

Annex ACX(11)

Supritendent Engineer LM Section <selmkalwa@gmail.com>

 Gmail

**Regarding Overdrawl by Mumbai DISCOM**

1 message

Wed, Feb 21, 2018 at 4:34 PM

SE LMCell Karwa <selmkalwa@gmail.com>  
To: "cesldc@mahasldc.in" <cesldc@mahasldc.in>, scheduling <scheduling@mahasldc.in>  
Cc: Chief Engineer <ceppmsedcl@gmail.com>, Satish Chavan <directorcommsedcl@gmail.com>

Dear Sir,

As per DSR report, there is overdrawl since last few days by Mumbai Discom. It is requested to verify Mumbai Discom overdrawl & control overdrawl also requested not to use Koyna Hydro to control overdrawl of Mumbai Discom.

Regards

--  
Load Management Cell,  
MSEDCL, Old SLDC Building,  
Power House, Sector-1, Airoli,  
Navi Mumbai -400708  
Control Room Mobil No: 9833383880  
Control Room Fax No: 022-27602220



**Mumbai UI\_18-02-18\_20-02-18.xlsx**

69K



Gmail - Regarding Overdrawl by Mumbai DISCOM for Dt. 27-02-2018

Annex A (XIV)

Supritendent Engineer LM Section <selmkalwa@gmail.com>

8/7/2018

M Gmail

Regarding Overdrawl by Mumbai DISCOM for Dt. 27-02-2018

1 message

Tue, Feb 27, 2018 at 9:44 AM


SE LMCell Kalwa <selmkalwa@gmail.com>  
To: "cesldc@mahasldc.in" <cesldc@mahasldc.in>, scheduling <scheduling@mahasldc.in>  
Cc: Chief Engineer <ceppmsedcl@gmail.com>, Satish Chavan <directorcommsedcl@gmail.com>

Dear Sir,

In view of present power scenario, For Dt. 27-02-2018, as per Mumbai Discom Exchange in Lodestar Schedule (attached for your ready reference) , there is continuous overdraw since morning by Mumbai Discom (TPC-D). It is requested to verify Mumbai Discom (TPC-D) Overdrawl & also requested not to use Koyna Hydro to control overdrawl of Mumbai Discom since there may be unnecessary financial burden imposed on MSEDCL.

Regards,

--  
Load Management Cell,  
MSEDCL, Old SLDC Building,  
Power House, Sector-1, Airoli,  
Navi Mumbai -400708  
Control Room Mobil No: 9833383880  
Control Room Fax No: 022-27602220

 27-02-2018.xls  
357K

8/7/2018

Gmail - Regarding Overdrawl by Mumbai DISCOM for Dt. 10-03-2018



Annex A(xv)

Supritendent Engineer LM Section <selmkalwa@gmail.com>

**Regarding Overdrawl by Mumbai DISCOM for Dt. 10-03-2018**

1 message

Sat, Mar 10, 2018 at 7:28 PM


SE LMCCell Kalwa <selmkalwa@gmail.com>  
To: "cesldc@mahasldc.in" <cesldc@mahasldc.in>, scheduling <scheduling@mahasldc.in>  
Cc: Chief Engineer <ceppmsedcl@gmail.com>, Satish Chavan <directorcommsedcl@gmail.com>

Dear Sir,

In view of present power scenario, For Dt. 10-03-2018, as per Mumbai Discom Exchange in Lodestar Schedule (attached for your ready reference), there is continuous overdraw by Mumbai Discom (TPC-D). It is requested to verify Mumbai Discom (TPC-D) Overdrawl & also requested not to use Koyna Hydro to control overdrawl of Mumbai Discom since there may be unnecessary financial burden imposed on MSEDCL.

Regards,

--  
Load Management Cell,  
MSEDCL, Old SLDC Building,  
Power House, Sector-1, Airoli,  
Navi Mumbai -400708  
Control Room Mobil No: 9833383880  
Control Room Fax No: 022-27602220

 **10-03-2018.xls**  
360K

8/7/2018

Gmail - Regarding Overdrawl by Mumbai DISCOM for Dt. 14-03-2018

Annex-A (XVI)

Supritendent Engineer LM Section <selmkalwa@gmail.com>

**Regarding Overdrawl by Mumbai DISCOM for Dt. 14-03-2018**

1 message

Wed, Mar 14, 2018 at 8:31 AM


SE LMCell Kalwa <selmkalwa@gmail.com>  
To: " cesldc@mahasldc.in" <cesldc@mahasldc.in>, scheduling <scheduling@mahasldc.in>  
Cc: Chief Engineer <ceppmsedcl@gmail.com>, Satish Chavan <directorcommsedcl@gmail.com>

Dear Sir,

In view of present power scenario, For Dt. 14-03-2018, as per Mumbai Discom Exchange in Lodestar Schedule ( attached for your ready reference) , there is continuous overdraw by Mumbai Discom . At present Mumbai share is 774MW whereas Mumbai Exchange is 1026 MW, which mean there is overdrawl on almost 250 MW by Mumbai DISCOM. It is requested to verify Mumbai Discom Overdrawl & also requested not to use Koyna Hydro to control overdrawl of Mumbai Discom since there will be unnecessary financial burden imposed on MSEDCL.

Regards,

--  
Load Management Cell,  
MSEDCL, Old SLDC Building,  
Power House, Sector-1, Airoli,  
Navi Mumbai -400708  
Control Room Mobil No: 9833383880  
Control Room Fax No: 022-27602220

 **Mumbai Exchang\_14.03.2018.xls**  
81K

8/7/2018

Gmail - Regarding Overdrawl by Mumbai DISCOM for Dt. 17-03-2018.

Annex - A (XVII)

Supritendent Engineer LM Section <selmkalwa@gmail.com>



Regarding Overdrawl by Mumbai DISCOM for Dt. 17-03-2018.

1 message

Sat, Mar 17, 2018 at 7:02 AM

SE LMCell Kalwa <selmkalwa@gmail.com>  
To: scheduling <scheduling@mahasldc.in>, "cesldc@mahasldc.in" <cesldc@mahasldc.in>  
Cc: Satish Chavan <directorcommsedcl@gmail.com>, Chief Engineer <ceppmsedcl@gmail.com>

Dear Sir,

In view of present power scenario, For Dt. 17-03-2018, as per Mumbai Discom Exchange in Lodestar Schedule (attached for your ready reference) , there is continuous overdraw by Mumbai Discom (TPC-D). It is requested to verify Mumbai Discom (TPC-D) Overdrawl & also requested not to use Koyna Hydro to control overdrawl of Mumbai Discom since there may be unnecessary financial burden imposed on MSEDCL.

Regards,

Load Management Cell,  
MSEDCL,Old SLDC Building,  
Power House, Sector-1, Airoli,  
Navi Mumbai -400708  
Control Room Mobil No: 9833383880  
Control Room Fax No: 022-27602220



17-03-2018 Schedule.xlsx  
165K

8/7/2018

Gmail - Regarding Overdrawl by Mumbai DISCOM for Dt. 18-03-2018 to 21-03-2018

Annex A (XVIII)



Supritendent Engineer LM Section <selmkalwa@gmail.com>

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**Regarding Overdrawl by Mumbai DISCOM for Dt. 18-03-2018 to 21-03-2018**

1 message 2021

SE LMCell Kalwa <selmkalwa@gmail.com>

Thu, Mar 22, 2018 at 9:28 AM

To: scheduling <scheduling@mahasldc.in>, " cesldc@mahasldc.in" <cesldc@mahasldc.in>

Cc: Satish Chavan <directorcommsedcl@gmail.com>, Chief Engineer <ceppmsedcl@gmail.com>

Dear Sir,


The working sheet showing overdrawl by Mumbai Utilities till 21st March 2018 ( calculated based on SLDC DSR data ) is attached herewith. It can be seen that there was overdrawl by Mumbai Discom particularly during peak demand hour i.e 06:00 Hrs to 18:00 Hrs . In order to meet demand, MSEDCL is daily purchasing power from IEX despite of tremendous increase in rate of IEX power. Due to such overdrawl, not only Koyna Hydro is being used but also more costly power is to be purchased from Market. This is causing unnecessary financial burden on MSEDCL.

In view of above, it was requested to verify Mumbai Discom Overdrawl & instruct concern DISCOM to make necessary power availability to meet their demand & also requested not to use Koyna Hydro to control overdrawl of Mumbai Discom . However it is seen that there was overdrawl from Mumbai uiltities & Koyna Hydro was used. It is once again requested to verify Mumbai Discom Overdrawl & instruct concern DISCOM to make necessary power availability to meet their demand & also requested not to use Koyna Hydro to control overdrawl of Mumbai Discom

Regards,

--  
Load Management Cell,  
MSEDCL, Old SLDC Building,  
Power House, Sector-1, Airoli,  
Navi Mumbai -400708  
Control Room Mobil No: 9833383880  
Control Room Fax No: 022-27602220

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 **Mumbai UI\_01.02.18\_24.02.18 as per DSR.xls**

346K

8/7/2018

Gmail - Regarding Overdrawl by Mumbai DISCOM for Dt. 19-04-2018

Annex - A (XIX)

 Gmail

Supritendent Engineer LM Section <selmkalwa@gmail.com>

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**Regarding Overdrawl by Mumbai DISCOM for Dt. 19-04-2018**

1 message

SE LMC M. Kalwa <selmkalwa@gmail.com>

Thu, Apr 19, 2018 at 10:10 AM

To: scheduling <scheduling@mahasldc.in>, " cesldc@mahasldc.in" <cesldc@mahasldc.in>

Cc: Chief Engineer <ceppmsedcl@gmail.com>, Satish Chavan <directorcommstedcl@gmail.com>, abhijitd2002 <abhijitd2002@yahoo.com>


Dear Sir,

In view of present power scenario, For Dt. 19-04-2018, as per Mumbai Discom Exchange in Lodestar Schedule including BRBCL power ( attached for your ready reference) , there is continuous overdraw by Mumbai Discom . It is requested to verify Mumbai Discom Overdrawl, not to use Koyna Hydro to control overdrawl of Mumbai Discom if any or ask Mumbai Discom to make alternate power arrangement.

Regards

--  
Load Management Cell,  
MSEDCL, Old SLDC Building,  
Power House, Sector-1, Airoli,  
Navi Mumbai -400708  
Control Room Mobil No: 9833383880  
Control Room Fax No: 022-27602220

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 **19-04-2018 Schedule.xlsx**  
209K

8/7/2018

Gmail - Regarding Overdrawl by Mumbai DISCOM for Dt. 22-03-2018 to 26-03-2018

ANNEX - A (XX)

Supritendent Engineer LM Section <selmkalwa@gmail.com>

**Regarding Overdrawl by Mumbai DISCOM for Dt. 22-03-2018 to 26-03-2018**

1 message

SE LMCell Kalwa <selmkalwa@gmail.com>

Tue, Mar 27, 2018 at 8:51 AM

To: scheduling <scheduling@mahasldc.in>, " cesldc@mahasldc.in" <cesldc@mahasldc.in>

Cc: Satis Chavan <directorcommsedcl@gmail.com>, Chief Engineer <ceppmsedcl@gmail.com>


Dear Sir,

This is in continuation to our earlier emails wherein it was informed that there was overdrawl by Mumbai Utilities. The working sheet showing overdrawl by Mumbai Utilities till 26th March 2018 ( calculated based on SLDC DSR data ) is attached herewith. It can be seen that there was overdrawl by Mumbai Discom particularly during peak demand hour i.e 06:00 Hrs to 18:00 Hrs & on 26th March maximum overdrawl was 454 MW . In order to meet demand, MSEDCL is daily purchasing power from IEX despite of tremendous increase in rate of IEX power. Due to such overdrawl, not only Koyna Hydro is being used but also more costly power is to be purchased from Market. This is causing unnecessary financial burden on MSEDCL.

In view of above, it is once again requested to verify Mumbai Discom Overdrawl & instruct concern DISCOM to make necessary power availability to meet their demand & also requested not to use Koyna Hydro to control overdrawl of Mumbai Discom

Regards,

--  
Load Management Cell,  
MSEDCL, Old SLDC Building,  
Power House, Sector-1, Airoli.  
Navi Mumbai -400708  
Control Room Mobil No: 9833383880  
Control Room Fax No: 022-27602220

 **Mumbai UI\_01.02.18\_24.02.18 as per DSR.xls**  
348K

8/7/2018

Gmail - Regarding Overdrawl by Mumbai DISCOMs for Dt. 01.04.2018 to 16.04.2018

Annex - A (XXI)

Supritendent Engineer LM Section <selmkalwa@gmail.com>

Gmail

(E) ★

Regarding Overdrawl by Mumbai DISCOMs for Dt. 01.04.2018 to 16.04.2018

1 message

Tue, Apr 17, 2018 at 9:41 AM

SE LM Cell Kalwa <selmkalwa@gmail.com>  
To: scheduling <scheduling@mahasldc.in>, "cesldc@mahasldc.in" <cesldc@mahasldc.in>  
Cc: Ganish Chavan <directorcommsedcl@gmail.com>, Chief Engineer <ceppmsedcl@gmail.com>

Dear Sir,

This is in continuation to our earlier emails. The working sheet showing overdrawl by Mumbai Utilities till 16th April 2018 (calculated based on SLDC DSR data) is attached herewith. It can be seen that there was overdrawl by Mumbai Discom particularly during peak demand hour. In order to meet demand, MSEDCL is daily purchasing power from IEX despite of tremendous increase in rate of IEX power. Due to such overdrawl, not only Koyna Hydro is being used but also more costly power is to be purchased from Market. This is causing unnecessary financial burden on MSEDCL.

In view of above, it is requested to verify Mumbai Discom Overdrawl & instruct concern DISCOM to make necessary power availability to meet their demand & also requested not to use Koyna Hydro to control overdrawl of Mumbai Discom

Regards,

Load Management Cell,  
MSEDCL, Old SLDC Building,  
Power House, Sector-1, Airoli,  
Navi Mumbai -400708  
Control Room Mobil No: 9833383880  
Control Room Fax No: 022-27602220

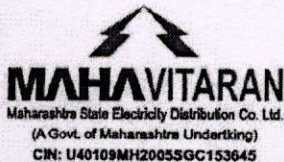


Mumbai UI\_01.04.18\_16.04.18 as per DSR.xls  
341K





Annexure - B



Maharashtra State Electricity Distribution Co. Ltd.  
Office of the Director (Commercial)  
Prakashgad, 6th Floor, Station Road, Bandra (E), Mumbai-400 051.  
Tel.: (P) 26476743 Extn: 2066, (O) 26474211  
Email: directorcomm@mahadiscom.in • Website : www.mahadiscom.in

Ref:- MSEDCL/Dir(Comm)/Koyana/25039

Date:- 23/10/2018

To,  
Director (Operations),  
MSETCL, Corporate Office,  
Prakashganga, Bandra Kurla Complex,  
Mumbai-400051.

Sub: Use of Koyana Hydro Generation by SLDC for Over drawl by Mumbai Discoms

Ref : 1. Various email from SE (LM), Kalwa  
2. CE/RE/MSEDCL/TPC/22091 Dated 15.09.2018

As you are aware that in present coal shortage scenario, there is power shortage all over nation & many Discoms including MSEDCL are buying power from power market at high cost. MSEDCL is also purchasing power from market through short term tender to tune of 1000MW & through power exchange to maximum allowable limit (as per standing clearance from SLDC) of 3200 MW as per requirement with available rate. Even after purchasing power to maximum extent, Koyana was extensively used in Sep 2018 & hence to save Koyana for peak period months i.e. Apr-19 & May -2019, Load shedding is being implemented all over state under MSEDCL jurisdiction area on feeders having DCL group G1 to G3 from 8<sup>th</sup> Oct 2018.

However, it is seen that Mumbai Discom's are continuously overdrawing power from the grid and the overdrawal by Mumbai Discom's from 1<sup>st</sup> June 2018 to 22<sup>nd</sup> Oct 2018 is to the tune of 224.26 Mus. The monthwise overdrawal by Mumbai Discom & use of Koyana Hydro for same is as under.

Month	Mumbai OD (MUs)	Koyana Used for Mumbai	
		Mus	TMC
June-2018	70.81	30.02	0.83
Jul-2018	50.84	25.53	0.71
Aug-2018	10.69	7.43	0.21
Sep-2018	44.18	34.45	0.96
Oct-2018 (upto 22.10.18)	47.74	29.23	0.81
Total	224.26	126.66	3.52

The detail of Mumbai overdrawal & use of Koyana is attached in pdf form for reference.

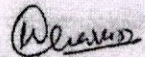
Further, in last few months during evening peak hours, there are instances when there was almost no margin left in Koyana hydro generation and system condition was so critical that WRDLC had penned EHV line to control overdrawl by the State. It was observed during June-2018 to Sep-2018 that TPC-D was selling power in power market during evening peak period;



even when it had no surplus for sale of such power. The said issues was brought to notice of CE, SLDC vide letter under ref(2). Moreover, overdrawal by Mumbai based on loadstar is also communicated vide number of emails in real time by Load Management cell, Kalwa and post facto based on DSR report prepared by SLDC. However, SLDC has not initiated any action to restrict Mumbai Discom from overdrawal. Even today, Koyna is continued to be used to match state LGB & to control overdrawl of Mumbai Discom which was brought to the notice of CE(SLDC) by the undersigned.

Presently 20.858 TMC Koyna is used & only 46.642 TMC is balance as on 22<sup>nd</sup> oct 2018, inspite of all out efforts taken by MSEDCL to save Koyna. The intended saving of Koyna water not achieved majorly because of utilization of koyna Hydro to meet out overdrawal of Mumbai.

In view of above, your intervention in the matter is required immediately to use the Koyna hydro generation to control overdrawal by Mumbai Discoms. Further in case of exigencies, SLDC wants to utilize Koyna hydro then it should be after confirmation of the undersigned or CMD MSEDCL only. Further, it is requested to instruct SLDC to develop mechanism to monitor Mumbai DISCOM overdrawal based on its actual available generation and demand in real time of operations. This is for further immediate needful action please.

  
Satish Chavan  
Director (Commercial)

Copy s.w.r.to:

1. The Principal Secretary, Energy, GoM, Mantralaya, Mumbai
2. Chairman & Managing Director, MSEDCL, Mumbai.
3. Chairman & Managing Director, MSETCL, Mumbai.

Copy to :

1. Chief Engineer (Power purchase/RE), MSEDCL, Mumbai.
2. Chief Engineer, SLDC, Kalwa, Navi Mumbai
3. Superintending Engineer(LM), MSEDCL, Kalwa, Navi Mumbai.

81  
50  
/ 31



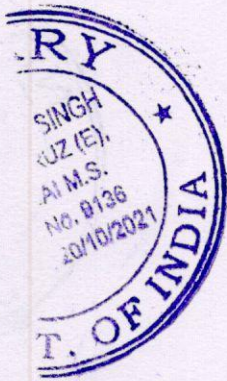
Annexure -C

Details of power purchase by MSEDCL through bilateral and exchange in FY 2017-18 and FY 2018-19 :

Month	Exchange Purchase			Bilateral Purchase (Tenders)		
	Mus	Amt (Crs)	Rate (Rs /Kwh)	Mus	Amt (Crs)	Rate (Rs /Kwh)
Apr-17	259.03	73.95	2.86	0.00	0.00	0.00
May-17	231.90	74.97	3.23	276.94	86.37	3.12
Jun-17	65.26	19.92	3.05	0.00	0.00	0.00
Jul-17	71.57	18.65	2.61	48.57	13.36	2.75
Aug-17	116.18	32.80	2.82	55.81	15.40	2.76
Sep-17	47.06	16.17	3.44	83.47	32.66	3.91
Oct-17	54.71	22.02	4.03	565.03	223.39	3.95
Nov-17	265.61	119.68	4.51	506.30053	189.3049	3.74
Dec-17	101.77	40.14	3.94	305.85364	108.27299	3.54
Jan-18	172.71	74.41	4.31			
Feb-18	147.78	62.34	4.22			
Mar-18	247.57	115.40	4.66	396.58	156.10	3.94
Total	1781.14	670.46	3.76	2238.56	824.85	3.68
Grand Total	4019.70	1495.31	3.72			

Month	Exchange Purchase			Bilateral Purchase (Tenders)		
	Mus	Amt (Crs)	Rate (Rs /Kwh)	Mus	Amt (Crs)	Rate (Rs /Kwh)
Apr-18	158.45	67.01	4.23	420.23	169.77	4.04
May-18	381.65	191.49	5.02	409.66	165.50	4.04
Jun-18	132.17	57.79	4.37	101.82	43.17	4.24
Jul-18	14.37	4.68	3.26	0.00	0.00	0.00
Aug-18	59.50	21.43	3.60	0.00	0.00	0.00
Sep-18	920.09	485.49	5.28	252.40	111.81	4.43
Oct-18	1375.67	839.87	6.11	444.28	205.41	4.62
Nov-18	266.60	117.72	4.42	371.14219	168.4870	4.54
Dec-18	19.97	8.28	4.14			
Jan-19						
Feb-19						
Mar-19						
Total	3328.47	1793.75	5.39	1999.53	864.16	4.32
Grand Total	5328.00	2657.92	4.99			





Annexure - D (II)  
Details of Mumbai UI for Dec-17 to Feb-18 (based on DSR)

Date	Dec-17			Jan-18			Feb-18		
	SCH	EXCH	UI	SCH	EXCH	UI	SCH	EXCH	UI
01-12-2017	-22,998	-24,612	1,613	-15,65	-14,226	-1,424	-24,682	-25,806	1,124
02-12-2017	-25,598	-24,977	-622	-16,523	-16,923	0.4	-23,976	-25,631	1,655
03-12-2017	-19,332	-23,837	4,505	-17,87	-22,304	4,434	-21,919	-24,113	2,194
04-12-2017	-26,705	-27,013	0,308	-21,48	-24,129	2,649	-18,554	-19,422	0,868
05-12-2017	-22,084	-25,051	2,967	-23,759	-27,136	3,377	-20,035	-24,131	4,096
06-12-2017	-21,629	-25,37	3,741	-26,349	-30,376	4,027	-19,871	-22,752	2,881
07-12-2017	-22,888	-23,883	0,975	-19,002	-24,243	5,241	-27,3485	-26,383	-0,9655
08-12-2017	-23,291	-25,159	1,868	-30,31	-29,732	-0,578	-18,1	-22,127	4,037
09-12-2017	-19,652	-22,893	-0,393	-28,815	-33,487	1,672	-18,288	-20,457	2,169
10-12-2017	-24,329	-23,423	-0,906	-24,747	-33,954	9,207	-14,864	-18,122	3,258
11-12-2017	-21,727	-24,013	2,286	-33,925	8,801	8,801	-12,314	-16,433	4,119
12-12-2017	-20,011	-22,265	2,254	-31,967	-33,328	3,361	-16,333	-19,828	3,495
13-12-2017	-18,408	-17,909	-0,499	-30,466	-32,543	2,077	-17,056	-17,682	0,626
14-12-2017	-19,862	-18,873	-1,009	-25,205	-27,74	2,535	-18,449	-21,433	2,984
15-12-2017	-17,934	-20,79	2,856	-29,206	-32,604	3,398	-18,1	-22,186	4,086
16-12-2017	-17,055	-18,115	1,06	-30,397	-33,928	3,531	-19,96	-23,127	3,267
17-12-2017	-17,108	-21,076	3,968	-31,931	-32,97	1,039	-19,337	-20,227	0,89
18-12-2017	-16,314	-21,923	5,609	-25,957	-27,743	1,786	-14,818	-17,472	2,654
19-12-2017	-17,562	-21,985	4,332	-24,917	-27,89	2,973	-18,125	-21,553	3,428
20-12-2017	-18,146	-21,985	3,839	-24,028	-24,765	0,737	-17,847	-20,71	2,863
21-12-2017	-15,778	-22,541	6,763	-20,56	-20,565	0,005	-20,501	-19,913	-0,588
22-12-2017	-18,71	-18,936	0,226	-23,522	-25,221	1,699	-20,897	-19,911	-0,906
23-12-2017	-19,278	-19,449	0,171	-22,06	-24,434	2,374	-18,559	-22,157	3,598
24-12-2017	-20,56	-23,787	3,227	-23,117	-23,739	0,622	-18,559	-22,157	3,559
25-12-2017	-18,876	-20,403	1,527	-22,387	-23,593	1,206	-16,645	-21,348	4,703
26-12-2017	-18,417	-19,947	1,53	-17,308	-20,886	3,378	-21,425	-24,837	3,412
27-12-2017	-18,806	-19,335	0,529	-20,618	-19,731	-0,804	-21,328	-24,102	2,774
28-12-2017	-18,017	-17,546	-0,471	-19,015	-23,416	1,793	-23,908	-23,883	0
29-12-2017	-16,1	-13,433	2,667	-21,623	-23,614	3,487	-21,328	-24,102	2,774
30-12-2017	-16,1	-13,433	2,667	-22,327	-23,614	3,487	-23,908	-23,883	0
31-12-2017	-16,1	-13,433	2,667	-24,715	-26,471	1,756	66,2555	68,74	-2,4845
Total		54,273	60,84		73,872	77,565			



**Annexure - D (III)**  
**Details of Mumbai UI for Mar-18 to May-18 (based on DSR)**

Date	Mar-18				U/D
	SCH	EXCH	UI	O/D	
01-03-2018	-22,436	-24,723	2,287	2,287	0
02-03-2018	-15,668	-20,571	4,903	4,903	0
03-03-2018	-22,395	-23,605	1,211	1,211	0
04-03-2018	-18,623	-20,451	1,828	1,828	0
05-03-2018	-22,828	-24,004	1,176	1,176	0
06-03-2018	-23,436	-24,572	1,136	1,136	0
07-03-2018	-21,554	-23,93	2,376	2,376	0
08-03-2018	-22,281	-22,607	0,326	0,326	0
09-03-2018	-22,636	-21,553	-1,083	0	-1,083
10-03-2018	-23,124	-20,689	2,435	0	-2,425
11-03-2018	-18,054	-19,905	1,851	1,851	0
12-03-2018	-21,311	-25,907	4,596	4,596	0
13-03-2018	-24,758	-26,24	1,482	1,482	0
14-03-2018	-24,766	-25,633	0,867	0,867	0
15-03-2018	-22,814	-24,718	1,904	1,904	0
16-03-2018	-20,53	-28,528	7,996	7,996	0
17-03-2018	-22,113	-26,253	4,14	4,14	0
18-03-2018	-20,689	-20,931	0,232	0,232	0
19-03-2018	-23,847	-25,951	2,104	2,104	0
20-03-2018	-23,135	-26,759	3,624	3,624	0
21-03-2018	-22,47	-26,81	4,34	4,34	0
22-03-2018	-22,313	-24,64	2,327	2,327	0
23-03-2018	-20,968	-24,597	3,629	3,629	0
24-03-2018	-22,009	-22,375	0,366	0,366	0
25-03-2018	-18,952	-18,654	-0,298	0	-0,298
26-03-2018	-22,452	-27,018	4,566	4,566	0
27-03-2018	-25,452	-28,921	3,469	3,469	0
28-03-2018	-28,184	-37,556	-0,628	0	-0,628
29-03-2018	-24,55	-26,129	1,599	1,599	0
30-03-2018	-21,073	-28,389	7,316	7,316	0
31-03-2018	-22,946	-29,315	6,369	6,369	0
Total			73,585	78,019	-4,434

Date	Apr-18				U/D
	SCH	EXCH	UI	O/D	
01-04-2018	-17,585	-23,908	6,313	6,313	0
02-04-2018	-24,302	-27,826	3,524	3,524	0
03-04-2018	-24,482	-25,588	1,106	1,106	0
04-04-2018	-23,35	-27,823	4,473	4,473	0
05-04-2018	-22,841	-27,716	4,875	4,875	0
06-04-2018	-26,503	-28,081	1,578	1,578	0
07-04-2018	-25,175	-29,506	4,331	4,331	0
08-04-2018	-22,941	-25,895	2,944	2,944	0
09-04-2018	-20,293	-29,534	9,241	9,241	0
10-04-2018	-25,7	-30,314	4,614	4,614	0
11-04-2018	-26,734	-33,14	6,406	6,406	0
12-04-2018	-26,659	-30,628	3,969	3,969	0
13-04-2018	-26,659	-30,628	3,969	3,969	0
14-04-2018	-24,452	-26,899	2,447	2,447	0
15-04-2018	-22,994	-26,277	3,283	3,283	0
16-04-2018	-25,668	-34,627	8,959	8,959	0
17-04-2018	-27,192	-35,067	7,875	7,875	0
18-04-2018	-29,665	-37,252	7,587	7,587	0
19-04-2018	-30,612	-33,609	2,997	2,997	0
20-04-2018	-28,865	-36,661	7,796	7,796	0
21-04-2018	-26,343	-28,301	1,958	1,958	0
22-04-2018	-23,185	-24,214	1,029	1,029	0
23-04-2018	-28,474	-30,424	1,95	1,95	0
24-04-2018	-26,833	-29,923	3,09	3,09	0
25-04-2018	-27,963	-30,921	2,938	2,938	0
26-04-2018	-29,27	-30,426	1,156	1,156	0
27-04-2018	-27,63	-29,002	1,372	1,372	0
28-04-2018	-26,428	-26,199	-0,229	0	-0,229
29-04-2018	-22,707	-23,06	0,353	0,353	0
30-04-2018	-23,686	-30,754	7,068	7,068	0
Total		-765,221	118,972	119,201	-0,229

Date	May-18				U/D
	SCH	EXCH	UI	O/D	
01-05-2018	-27,518	-27,983	0,465	0,465	0
02-05-2018	-28,749	-32,797	4,048	4,048	0
03-05-2018	-28,769	-30,847	2,078	2,078	0
04-05-2018	-29,21	-30,756	1,546	1,546	0
05-05-2018	-28,915	-28,719	-1,196	0	-1,196
06-05-2018	-24,511	-24,864	0,353	0,353	0
07-05-2018	-31,321	-30,669	1,945	1,945	0
08-05-2018	-30,949	-31,295	-0,656	0	-0,656
09-05-2018	-27,608	-31,015	3,407	3,407	0
10-05-2018	-28,577	-32,295	3,718	3,718	0
11-05-2018	-30,169	-28,937	-1,232	0	-1,232
12-05-2018	-27,065	-27,219	0,154	0,154	0
13-05-2018	-28,616	-32,576	3,96	3,96	0
14-05-2018	-31,355	-33,965	2,61	2,61	0
15-05-2018	-31,273	-34,145	2,872	2,872	0
16-05-2018	-32,618	-34,815	2,197	2,197	0
17-05-2018	-30,344	-35,077	4,733	4,733	0
18-05-2018	-30,519	-32,766	2,247	2,247	0
19-05-2018	-28,099	-26,248	0,149	0,149	0
20-05-2018	-30,779	-34,059	3,28	3,28	0
21-05-2018	-29,618	-33,785	4,167	4,167	0
22-05-2018	-29,949	-33,522	3,573	3,573	0
23-05-2018	-27,568	-33,706	6,138	6,138	0
24-05-2018	-28,264	-33,706	5,442	5,442	0
25-05-2018	-28,264	-34,593	6,329	6,329	0
26-05-2018	-27,713	-33,532	5,819	5,819	0
27-05-2018	-30,4	-36,421	6,021	6,021	0
28-05-2018	-31,219	-38,287	7,068	7,068	0
29-05-2018	-34,169	-37,276	3,107	3,107	0
30-05-2018	-32,258	-37,207	4,949	4,949	0
31-05-2018	-813,414	-1,003,75	90,333	93,417	-3,084
Total					



**Annexure - D (IV)**  
**Details of Mumbai UI for Jun-18 to Aug-18 (based on DSR)**

Jun-18					
Date	SCH	EXCH	UI	OID	U/D
01-06-2018	-33,293	-32,961	-0,432	0	-0,432
02-06-2018	-32,634	-31,698	-0,936	0	-0,936
03-06-2018	-29,842	-25,878	-3,964	0	-3,964
04-06-2018	-33,255	-33,225	-0,03	0	-0,03
05-06-2018	-33,687	-32,703	-0,984	0	-0,984
06-06-2018	-30,828	-35,623	4,795	4,795	0
07-06-2018	-29,275	-32,811	3,536	3,536	0
08-06-2018	-26,788	-34,098	7,31	7,31	0
09-06-2018	-29,349	-25,943	-3,406	0	-3,406
10-06-2018	-20,773	-28,182	7,409	7,409	0
11-06-2018	-29,754	-36,019	6,265	6,265	0
12-06-2018	-31,903	-36,576	4,673	4,673	0
13-06-2018	-30,313	-37,379	7,066	7,066	0
14-06-2018	-30,305	-34,213	3,908	3,908	0
15-06-2018	-29,702	-34,441	4,739	4,739	0
16-06-2018	-28,898	-24,892	0,711	0,711	0
17-06-2018	-23,889	-24,892	1,003	1,003	0
18-06-2018	-26,32	-28,158	1,838	1,838	0
19-06-2018	-23,964	-25,87	1,906	1,906	0
20-06-2018	-26,004	-28,334	2,33	2,33	0
21-06-2018	-23,058	-31,727	8,669	8,669	0
22-06-2018	-24,501	-35,288	10,787	10,787	0
23-06-2018	-22,505	-27,249	4,744	4,744	0
24-06-2018	-18,559	-21,432	2,873	2,873	0
25-06-2018	-21,448	-28,072	7,624	7,624	0
26-06-2018	-21,833	-31,672	9,839	9,839	0
27-06-2018	-24,494	-31,169	6,675	6,675	0
28-06-2018	-24,326	-27,764	3,438	3,438	0
29-06-2018	-22,248	-29,885	7,637	7,637	0
30-06-2018	-24,23	-28,449	4,219	4,219	0
<b>Total</b>	<b>-807,778</b>	<b>-922,02</b>	<b>114,242</b>	<b>123,994</b>	<b>-9,752</b>

Jul-18					
Date	SCH	EXCH	UI	OID	U/D
01-07-2018	-19,149	-24,899	5,75	5,75	0
02-07-2018	-18,692	-26,809	8,117	8,117	0
03-07-2018	-23,407	-28,721	5,314	5,314	0
04-07-2018	-22,946	-32,237	9,291	9,291	0
05-07-2018	-34,989	-33,021	0,032	0,032	0
06-07-2018	-26,549	-35,829	9,28	9,28	0
07-07-2018	-26,054	-29,959	3,905	3,905	0
08-07-2018	-17,182	-19,627	2,445	2,445	0
09-07-2018	-19,265	-22,425	1,16	1,16	0
10-07-2018	-19,645	-22,664	3,019	3,019	0
11-07-2018	-30,686	-27,868	7,182	7,182	0
12-07-2018	-21,984	-25,43	3,476	3,476	0
13-07-2018	-22,23	-27,355	5,125	5,125	0
14-07-2018	-19,897	-25,208	5,311	5,311	0
15-07-2018	-15,216	-23,03	7,814	7,814	0
16-07-2018	-19,663	-27,01	7,347	7,347	0
17-07-2018	-18,985	-27,878	8,893	8,893	0
18-07-2018	-19,68	-28,426	8,746	8,746	0
19-07-2018	-21,47	-29,07	7,6	7,6	0
20-07-2018	-19,591	-28,809	9,218	9,218	0
21-07-2018	-20,275	-26,057	5,782	5,782	0
22-07-2018	-19,826	-22,445	2,619	2,619	0
23-07-2018	-22,194	-29,712	7,518	7,518	0
24-07-2018	-24,467	-28,101	3,614	3,614	0
25-07-2018	-22,01	-29,54	7,53	7,53	0
26-07-2018	-21,642	-30,037	8,395	8,395	0
27-07-2018	-23,337	-29,709	6,372	6,372	0
28-07-2018	-20,433	-26,104	5,671	5,671	0
29-07-2018	-18,632	-21,058	2,426	2,426	0
30-07-2018	-24,089	-29,341	5,252	5,252	0
31-07-2018	-22,033	-29,63	7,597	7,597	0
<b>Total</b>	<b>-658,208</b>	<b>-848,009</b>	<b>189,801</b>	<b>189,801</b>	<b>0</b>

Aug-18					
Date	SCH	EXCH	UI	OID	U/D
01-08-2018	-26,99	-33,151	6,161	6,161	0
02-08-2018	-25,952	-28,316	2,364	2,364	0
03-08-2018	-25,299	-29,817	4,518	4,518	0
04-08-2018	-21,15	-24,295	3,145	3,145	0
05-08-2018	-21,15	-24,295	3,145	3,145	0
06-08-2018	-21,492	-28,994	7,502	7,502	0
07-08-2018	-24,985	-26,881	1,896	1,896	0
08-08-2018	-23,391	-28,24	4,849	4,849	0
09-08-2018	-21,424	-28,359	6,935	6,935	0
10-08-2018	-21,938	-28,407	6,469	6,469	0
11-08-2018	-20,339	-27,044	6,705	6,705	0
12-08-2018	-19,011	-23,304	4,293	4,293	0
13-08-2018	-23,611	-26,719	3,108	3,108	0
14-08-2018	-24,047	-22,663	-1,384	0	-1,384
15-08-2018	-18,014	-22,726	4,712	4,712	0
16-08-2018	-21,409	-27,818	6,409	6,409	0
17-08-2018	-22,492	-27,544	5,052	5,052	0
18-08-2018	-20,654	-24,788	4,134	4,134	0
19-08-2018	-16,797	-22,011	5,214	5,214	0
20-08-2018	-23,389	-25,257	1,868	1,868	0
21-08-2018	-23,632	-26,757	3,125	3,125	0
22-08-2018	-24,482	-27,828	3,346	3,346	0
23-08-2018	-22,731	-25,338	2,607	2,607	0
24-08-2018	-21,284	-24,844	3,56	3,56	0
25-08-2018	-19,778	-23,443	3,665	3,665	0
26-08-2018	-17,232	-20,949	3,717	3,717	0
27-08-2018	-20,984	-24,528	3,544	3,544	0
28-08-2018	-23,773	-22,773	-1	0	-1
29-08-2018	-24,372	-24,116	-0,256	0	-0,256
30-08-2018	-24,397	-27,4	3,003	3,003	0
31-08-2018	-24,28	-27,987	3,707	3,707	0
<b>Total</b>	<b>-690,479</b>	<b>-806,592</b>	<b>116,113</b>	<b>118,763</b>	<b>-2,64</b>



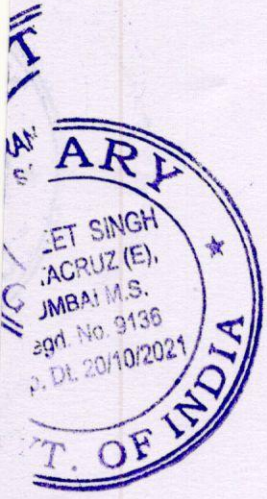
Annexure - D (V)  
Details of Mumbai UI for Sep-18 to Nov-18 (based on DSR)

Sep-18						
Date	SCH	EXCH	UI	OID	UID	
01-09-2018	-24,374	-25,623	1,249	1,249	0	
02-09-2018	-22,787	-23,123	0,336	0,336	0	
03-09-2018	-21,453	-24,623	3,17	4,818	0	
04-09-2018	-23,02	-27,838	4,818	4,818	0	
05-09-2018	-25,281	-23,946	-1,335	0	-1,335	
06-09-2018	-25,008	-25,844	0,836	0,836	0	
07-09-2018	-25,302	-25,77	0,468	0,468	0	
08-09-2018	-23,675	-22,984	-0,691	0	-0,691	
09-09-2018	-19,411	-16,115	-3,296	0	-3,296	
10-09-2018	-22,9	-21,516	-1,384	0	-1,384	
11-09-2018	-21,937	-22,752	0,815	0,815	0	
12-09-2018	-22,802	-23,019	0,217	0,217	0	
13-09-2018	-18,247	-18,54	0,293	0,293	0	
14-09-2018	-20,824	-21,315	0,491	0,491	0	
15-09-2018	-21,347	-20,471	-0,876	0	-0,876	
16-09-2018	-19,077	-18,035	-1,042	0	-1,042	
17-09-2018	-20,802	-26,542	5,74	5,74	0	
18-09-2018	-20,816	-24,287	3,471	3,471	0	
19-09-2018	-21,804	-24,438	2,634	2,634	0	
20-09-2018	-20,5	-22,746	2,246	2,246	0	
21-09-2018	-21,72	-25,676	3,956	3,956	0	
22-09-2018	-21,375	-29,532	8,157	8,157	0	
23-09-2018	-21,761	-19,592	-2,169	0	-2,169	
24-09-2018	-25,933	-24,536	-1,397	0	-1,397	
25-09-2018	-23,982	-25,71	1,728	1,728	0	
26-09-2018	-22,573	-26,891	4,318	4,318	0	
27-09-2018	-22,968	-27,44	4,472	4,472	0	
28-09-2018	-24,46	-27,274	2,814	2,814	0	
29-09-2018	-25,936	-26,228	0,292	0,292	0	
30-09-2018	-23,076	-23,61	0,534	0,534	0	
Total	-675,151	-716,016	40,865	53,065	-12,19	

Oct-18						
Date	SCH	EXCH	UI	OID	UID	
01-10-2018	-27,434	-29,37	1,936	1,936	0	
02-10-2018	-31,508	-27,284	-4,224	0	-4,224	
03-10-2018	-25,805	-29,881	4,076	4,076	0	
04-10-2018	-26,133	-29,102	2,969	2,969	0	
05-10-2018	-26,595	-29,948	1,353	1,353	0	
06-10-2018	-27,439	-28,858	1,419	1,419	0	
07-10-2018	-23,229	-28,012	4,783	4,783	0	
08-10-2018	-27,272	-31,711	4,439	4,439	0	
09-10-2018	-30,698	-32,188	1,5	1,5	0	
10-10-2018	-33,368	-33,688	0,3	0,3	0	
11-10-2018	-30,018	-32,684	2,666	2,666	0	
12-10-2018	-30,024	-33,556	3,532	3,532	0	
13-10-2018	-28,557	-32,261	3,704	3,704	0	
14-10-2018	-28,813	-30,751	0,938	0,938	0	
15-10-2018	-31,872	-33,711	1,839	1,839	0	
16-10-2018	-31,1	-32,464	1,364	1,364	0	
17-10-2018	-31,9	-33,013	1,113	1,113	0	
18-10-2018	-27,147	-31,28	4,133	4,133	0	
19-10-2018	-30,504	-33,352	2,848	2,848	0	
20-10-2018	-24,859	-30,401	5,542	5,542	0	
21-10-2018	-22,664	-25,337	2,673	2,673	0	
22-10-2018	-26,823	-30,671	3,848	3,848	0	
23-10-2018	-27,928	-30,147	2,219	2,219	0	
24-10-2018	-29,348	-30,681	1,333	1,333	0	
25-10-2018	-27,487	-29,815	2,328	2,328	0	
26-10-2018	-26,872	-33,159	6,287	6,287	0	
27-10-2018	-22,434	-30,633	8,199	8,199	0	
28-10-2018	-21,123	-25,776	4,653	4,653	0	
29-10-2018	-22,854	-32,461	9,627	9,627	0	
30-10-2018	-22,23	-27,684	5,454	5,454	0	
31-10-2018	-20,976	-26,596	5,62	5,62	0	
Total	-847,984	-946,465	98,471	102,595	-4,224	

Nov-18						
Date	SCH	EXCH	UI	OID	UID	
01-11-2018	-20,012	-27,867	7,855	7,855	0	
02-11-2018	-23,179	-26,058	4,879	4,879	0	
03-11-2018	-23,484	-25,236	1,752	1,752	0	
04-11-2018	-18,61	-22,959	4,349	4,349	0	
05-11-2018	-27,51	-33,862	6,352	6,352	0	
06-11-2018	-25,312	-33,003	7,691	7,691	0	
07-11-2018	-20,039	-27,848	7,809	7,809	0	
08-11-2018	-23,168	-26,512	3,344	3,344	0	
09-11-2018	-22,945	-28,818	5,873	5,873	0	
10-11-2018	-19,249	-27,442	8,193	8,193	0	
11-11-2018	-18,926	-26,36	7,434	7,434	0	
12-11-2018	-24,465	-34,744	10,279	10,279	0	
13-11-2018	-19,781	-30,14	10,359	10,359	0	
14-11-2018	-18,997	-28,144	9,147	9,147	0	
15-11-2018	-18,504	-30,256	11,752	11,752	0	
16-11-2018	-25,312	-28,713	3,401	3,401	0	
17-11-2018	-19,083	-24,23	5,147	5,147	0	
18-11-2018	-21,866	-21,766	-0,1	0	-0,1	
19-11-2018	-23,3	-28,434	5,134	5,134	0	
20-11-2018	-21,609	-32,89	11,281	11,281	0	
21-11-2018	-21,847	-32,118	10,271	10,271	0	
22-11-2018	-20,768	-32,839	12,071	12,071	0	
23-11-2018	-22,892	-30,98	8,088	8,088	0	
24-11-2018	-18,963	-27,36	8,377	8,377	0	
25-11-2018	-18,614	-23,919	5,305	5,305	0	
26-11-2018	-22,692	-28,443	5,751	5,751	0	
27-11-2018	-22,101	-29,076	6,975	6,975	0	
28-11-2018	-20,094	-28,191	8,097	8,097	0	
29-11-2018	-21,658	-28,011	6,153	6,153	0	
30-11-2018	-19,618	-27,054	7,436	7,436	0	
Total	-644,818	-855,073	210,255	210,355	-0,1	





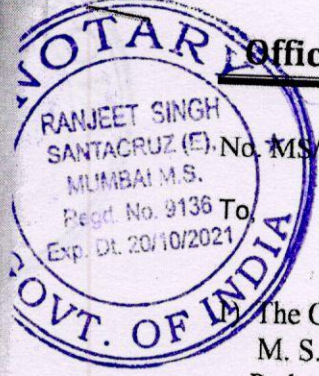
**Annexure - D (VI)**  
**Details of Mumbai UI for Dec-18 (based on DSR)**

Date	Dec-18				
	SCH	EYCH	UI	O/D	U/D
01-12-2018	-16,314	-25,537	9,223	9,223	0
02-12-2018	-17,862	-21,119	3,457	3,457	0
03-12-2018	-10,875	-25,228	14,353	14,353	0
04-12-2018	-22,984	-25,158	2,194	2,194	0
05-12-2018	-21,453	-24,089	2,636	2,636	0
06-12-2018	-18,744	-23,137	4,393	4,393	0
07-12-2018	-18,556	-25,271	6,715	6,715	0
08-12-2018	-17,587	-22,387	4,7	4,7	0
09-12-2018	-15,835	-19,454	3,619	3,619	0
10-12-2018	-13,921	-21,557	7,636	7,636	0
11-12-2018	-16,326	-21,143	4,817	4,817	0
12-12-2018	-18,313	-21,353	3,04	3,04	0
13-12-2018	-19,055	-21,083	2,028	2,028	0
14-12-2018	-16,588	-21,081	4,493	4,493	0
15-12-2018	-14,07	-20,191	6,121	6,121	0
16-12-2018	-17,375	-18,055	0,68	0,68	0
17-12-2018	-18,629	-19,305	0,676	0,676	0
18-12-2018	-17,95	-22,959	5,009	5,009	0
19-12-2018	-17,928	-23,913	5,985	5,985	0
20-12-2018	-18,886	-21,235	2,349	2,349	0
21-12-2018	-17,484	-17,595	0,111	0,111	0
22-12-2018	-15,235	-18,162	2,927	2,927	0
23-12-2018	-17,714	-18,821	1,107	1,107	0
24-12-2018	-23,741	-24,812	1,071	1,071	0
25-12-2018	-16,568	-27,509	10,941	10,941	0
26-12-2018	-22,645	-23,697	1,052	1,052	0
27-12-2018	-22,695	-21,168	-1,527	0	-1,527
28-12-2018	-18,505	-21,44	2,935	2,935	0
29-12-2018	-15,683	-20,863	5,18	5,18	0
30-12-2018	-14,809	-18,854	4,145	4,145	0
31-12-2018	-15,782	-20,807	5,025	5,025	0
<b>Total</b>	<b>-549,952</b>	<b>-677,083</b>	<b>127,091</b>	<b>128,618</b>	<b>-1,527</b>

Annexure. E

# Maharashtra State Power Committee

Office - State Load Despatch Centre, Airoli, Navi Mumbai - 400 708



MS/MSPC/FBSM/No. 02768

Date: 27 DEC 2018

- The Chief Engineer (Power Purchase),  
M. S. Electricity Distribution Co. Ltd.,  
Prakashgad, Bandra (East),  
Mumbai -400 051  
Fax- (022) 26580645/26475012
- 2) The Dy. General Manager (Consumer  
Relation),  
Tata Power Co. Ltd.,  
Mumbai Corporate Centre,  
34, Sant Tukaram Road, Carnac Bandar,  
Mumbai- 400 009.
- 3) Mr. Abaji Naralkar,  
Adani Electricity Mumbai Limited,  
SCADA Dept., First Floor,  
Adani Electricity Management Institute,  
Jogeshwari-Vikhroli Link Road,  
Opposite SEEPZ Gate no 3, Goregaon (E)  
Mumbai-400065  
Fax- (022) 30093305/30094737
- 4) The Chief Engineer (Regulatory Cell)  
The BEST Undertaking,  
7<sup>th</sup> Floor, Multi Storied Annex Bldg,  
BEST Marg, Colaba,  
Mumbai- 400 005.  
Fax- (022) 22824978

**Sub:** Provisional bill of variable cost of FBSM pool for FY 2017-18 from Mumbai Utilities.

- Ref :** 1) MERC Daily Order in Case No. 297 of 2018.  
2) MERC MTR Order in Case No. 203 of 2017 for BEST.  
3) MERC MTR Order in Case No. 200 of 2017 for RInfra-D.  
4) MERC MTR Order in Case No. 69 of 2018 for TPC-D.

Sir,

Hon'ble MERC has issued daily Order dated 21.12.2018 u/r (1), in the above matter which states that

*"In response to the interim directions sought by MSEDCL, the Commission directs MSLDC to settle the MSEDCL demand of Rs. 989.41 crores by working out a provisional recovery of variable cost of FBSM pool for FY 2016-17 and FY 2017-18 from Mumbai Utilities pending final settlement of FBSM bills in due course. As the Mumbai Utilities have already recovered the imbalance power purchase cost from their consumers they would be required to pay the provisional amount to MSEDCL, as worked out and so apportioned by MSLDC."*

Therefore in line with the directives issued in daily order, the amount based on variable cost for the financial year 2017-2018 shall be deposited by respective utilities as per below:-

**Maharashtra State Power Committee**  
**Office - State Load Despatch Centre, Airoli, Navi Mumbai - 400 708**

Name of SPP	Amount (In Rs)	
	Payable	Receivable
AEML (erstwhile R-Infra)	3,02,66,00,000	-
BEST	1,87,97,00,000	-
TATA	1,25,24,00,000	-
MSEDCL	-	-
<b>Total</b>	<b>6,15,87,00,000</b>	<b>6,15,87,00,000</b>

(The amount shall be deposited by Mumbai utilities based on the orders dated 12.09.2018 in the matter of mid-term review of truing up of ARR for FY 2016-17 and provisional truing up of ARR for FY 2017-18 petition Mumbai utilities vide case no 200 of 2017, 69 of 2018 and 203 of 2017 of the AEML (erstwhile RInfra-D), TPC-D and BEST respectively. Hon'ble Commission has approved the power purchase from imbalance pool for Mumbai utilities in the said order u/r (2-4)).

MSPC has already issued FBSM bills till January-17 and will be in position to complete March-2017 bills by January-19. Therefore, the provisional recovery of FBSM bills from Mumbai utilities for period FY 2016-17 as sought by MSEDCL shall be considered as per the actual issued bills by MSPC as per practice.

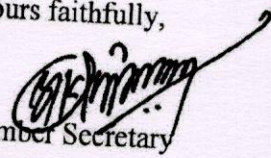
The details of Bank Account are as follows, viz.

Account Name: MSLDC UI Settlement Account  
Bank & Branch: Bank of Maharashtra, Airoli Branch  
Account No.: 20130402907  
IFSC Code: MAHB0001283

The due date for payment of above amounts is 11<sup>th</sup> January 2019.

Thanking you,

Yours faithfully,

  
Member Secretary  
MSPC

Annexure: (A) Relevant pages of MTR order for TPC-D, BEST and RInfra-D.

Copy submitted with respects to:

The Chairman, MSPC (Dr Surendrakumar Bagde, BEST, Mumbai)

**Maharashtra State Electricity Distribution Company Limited**  
**(A Govt. of Maharashtra Undertaking)**  
**CIN No.:U 40109MH2005SGC153645**

5<sup>th</sup> floor, Prakashgad, Plot No.G-9, Bandra (East), Mumbai – 400 051 ☎ (O) 26474211  
Email : cepp@mahadiscom.in Website : www.mahadiscom.in

CE/PP/MSEDCL/Addl Submission/ 297 of 2018/ 1389

Date: 15.01.2019

To,  
The Secretary,  
Maharashtra Electricity Regulatory Commission  
World Trade Centre,  
Cuffe Parade, Colaba,  
Mumbai- 400 005.

Sub: Petition seeking recovery of annual fixed cost component in respect of MSEDCL for the energy supplied to the State pool, recovery of differential amount to be recovered towards variable rate, removal of anomalies and directions in regards to overdrawl by Mumbai utilities in Balancing and Settlement Mechanism as per provision of ABT Order dated 17.05.2007 in Case No 42 of 2006 in the matter of introduction of Availability Based Tariff Regime at State level within Maharashtra and other related issues  
**-Additional Submission No. 03**

Respected Sir,

This has reference to above cited subject. Please find enclosed herewith MSEDCL's additional submission in Case No. 297 of 2018 in the Petition filed by MSEDCL for seeking recovery of annual fixed cost component in respect of MSEDCL for the energy supplied to the State pool, recovery of differential amount to be recovered towards variable rate, removal of anomalies and directions in regards to overdrawl by Mumbai utilities in Balancing and Settlement Mechanism as per provision of ABT Order dated 17.05.2007 in Case No 42 of 2006 in the matter of introduction of Availability Based Tariff Regime at State level within Maharashtra and other related issues.

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

Thanking You.

Yours faithfully,

  
Chief Engineer (Power Purchase)

**BEFORE THE HON'BLE MAHARASHTRA ELECTRICITY  
REGULATORY COMMISSION, MUMBAI**

FILING NO-

CASE NO- 297 of 2018

IN THE MATTER OF

Additional submission No. 3 in Case No 297 of 2018, seeking recovery of annual fixed cost component in respect of MSEDCL for the energy supplied to the State pool, recovery of differential amount to be recovered towards variable rate, removal of anomalies and directions in regards to overdrawl by Mumbai utilities in Balancing and Settlement Mechanism as per provision of ABT Order dated 17.05.2007 in Case No 42 of 2006 in the matter of introduction of Availability Based Tariff Regime at State level within Maharashtra and other related issues

AND

IN THE MATTER OF

Regulation 94 and 96 of MERC (Conduct of Business) Regulations, 2004

MAHARASHTRA STATE ELECTRICITY DISTRIBUTION COMPANY LTD PETITIONER;

The Chief Engineer (Power Purchase),  
Maharashtra State Electricity Distribution Co. Ltd  
Plot No G-9, Prakashgad, 5th floor, Station Road,  
Bandra (East), Mumbai – 400051  
E-mail : ceppmsedcl@gmail.com

.....PETITIONER

AND

IN THE MATTER OF

Maharashtra State Load Despatch Centre,  
Thane-Belapur Road, P.O. Airoli,  
Navi Mumbai – 400 708

..... RESPONDENTS

&

Others





**AFFIDAVIT ON BEHALF OF PETITIONER (MSEDCL) VERIFYING THE  
ADDITIONAL SUBMISSION No. 3**

I, SWAPNIL SUHAS KATKAR, aged 39 Years, son of Shri. SUHAS KATKAR, having my office at 5th Floor, Prakashgad, Bandra (East), Mumbai-400051 do solemnly affirm and say as follows:

1. I am the Incharge Chief Engineer (Power Purchase) of Maharashtra State Electricity Distribution Co. Ltd., the Review Petitioner in the above matter and am duly authorized competent to make this affidavit.
2. The statements made in paragraphs of the additional submission are true to my knowledge and belief and statements made in paragraphs one to three are based on information and I believe them to be true.
3. I say that there are no proceedings pending in any court of law/ tribunal or arbitrator or any other authority, wherein the Petitioner is a party and where issues arising and/or reliefs sought are identical or similar to the issues arising in the matter pending before the Commission.

Solemnly affirm at Mumbai on this \_\_\_<sup>th</sup> day of January-2019 that the contents of the above affidavit are true to my knowledge, no part of it is false and nothing material has been concealed there from.

  
Deponent

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

Identified before me

Mumbai

Date- 15 JAN 2019

**ATTESTED BY ME**



**CHAKSHUPAL L. BADGE**  
B.A.,LL.B.

**ADVOCATE HIGH COURT**  
**NOTARY GOVT. OF INDIA**  
Bldg. No. 160/645, Pant Nagar  
Ghatkoper (E) Mumbai-75.





**BEFORE THE HON'BLE MAHARASHTRA ELECTRICITY  
REGULATORY COMMISSION, MUMBAI**

Case No. 297 of 2018

**IN THE MATTER OF**

Petition seeking recovery of annual fixed cost component in respect of MSEDCL for the energy supplied to the State pool, recovery of differential amount to be recovered towards variable rate, removal of anomalies and directions in regards to overdrawl by Mumbai utilities in Balancing and Settlement Mechanism as per provision of ABT Order dated 17.05.2007 in Case No 42 of 2006 in the matter of introduction of Availability Based Tariff Regime at State level within Maharashtra and other related issues.

**AND**

**IN THE MATTER OF**

Regulation 94 and 96 of MERC (Conduct of Business) Regulations, 2004

**IN THE MATTER OF:**

Maharashtra State Electricity Distribution Company Limited  
5th Floor, Prakashgad,  
Plot No. G-9, Bandra (East),  
Mumbai – 400051

**... PETITIONER**

**VERSUS**

Maharashtra State Load Despatch Centre,  
Thane-Belapur Road, P.O. Airoli,  
Navi Mumbai – 400 708

**&**

**Others**


**... RESPONDENTS**

**Additional Submission No. 3 on behalf of Petitioner- MSEDCL**

1. MSEDCL most humbly submits that MSEDCL vide its letter dated 16.10.2018 has filed a petition seeking recovery of annual fixed cost component in respect of MSEDCL for the energy supplied to the State pool, recovery of differential amount to be recovered towards variable rate, removal of anomalies and directions in regards to overdrawl by Mumbai utilities in Balancing and Settlement Mechanism as per provision of ABT Order dated 17.05.2007 in Case No 42 of 2006 in the matter of introduction of Availability Based Tariff Regime at State level within Maharashtra and other related issues.
2. Hon'ble Commission, vide its daily order dated 21.12.2018 in the matter had directed MSLDC as under:-

6. In response to the interim directions sought by MSEDCL, the Commission directs MSLDC to settle the MSEDCL demand of Rs. 989.41 crores by working out a provisional recovery of variable cost of FBSM pool for FY 2016-17 and FY 2017-18 from Mumbai Utilities pending final settlement of FBSM bills in due course. As the Mumbai Utilities have already recovered the imbalance power purchase cost from their consumers they would be required to pay the provisional amount to MSEDCL, as worked out and so apportioned by MSLDC.
3. MSLDC, vide its letter dated 27.12.2018, raised bills of Rs. 615.87 Crs. to Mumbai utilities for FY 2017-18 only. The due date for above payment was mentioned as 11.01.2019. As submitted during the hearing on 15.01.2019 at 10:00 am; MSEDCL has not received any amount against these bills till 14.01.2019. However, on 15.01.2019, in the afternoon around 03:00 pm, MSEDCL has received only Rs. 183.85 Crs. against these bills.
4. MSEDCL therefore humbly requests Hon'ble Commission that suitable directives may please be given to MSLDC and Mumbai Utilities to pay full amount to





MSEDCL towards the settlement of variable charges as directed by Hon'ble Commission.

5. MSEDCL in its additional submission dated 14.01.2019 has pointed out to Hon'ble Commission that Mumbai utilities viz. R-Infra-D, TPC-D and BEST have drawn 1139.89 MUs of MSEDCL from April 2018 to December 2018, as per DSR report prepared by MSLDC. MSEDCL humbly submits that this energy consumed from state pool/over-drawn by Mumbai utilities is supplied by MSEDCL from its contracted generators and a payment to these contracted generators is already done.
6. Hence, MSEDCL humbly request Hon'ble Commission to direct MSLDC to issue bills towards provisional recovery of variable cost in FBSM pool for FY 2018-19 also on ad-hoc basis considering the difficulties and direct MSLDC to pass on the amount receivable to MSEDCL for FY 2018-19 on immediate basis.
7. MSEDCL further submits that the FBSM bill for FY 2016-17, FY 2017-18 and FY 2018-19 (upto December 2018) payable by Mumbai Utilities is towards the pool power consumed/over-drawl units, which was supplied by MSEDCL from its long term contracted generators and MSEDCL has to pay the bills of these generators as per the PPA terms and conditions. As per the PPA condition, MSEDCL has to pay within 30 days from the date of receipts of these bills; otherwise, delayed payment charges are applicable. Therefore, MSEDCL request Hon'ble Commission that the amount as payable by Mumbai utilities to MSEDCL for the variable charges of FBSM for FY 2016-17, FY 2017-18 and FY 2018-19 (upto December 2018) is to be paid with interest. The rate of interest may be the same as the rate of Delayed Payment Surcharge being billed by the generators to MSEDCL (SBI PLR + 4%).
8. MSEDCL in the petition dated 16.10.2018 has requested for recovery of annual Fixed Cost component in respect of MSEDCL for the energy supplied to the State pool for the past period as per the provision of ABT Order dated 17.05.2007 in Case No 42 of 2006. However, till date MSLDC has not initiated any action for settlement of the annual fixed cost component.

9. MSEDCL therefore humbly submits Hon'ble Commission that suitable directives may please be given to MSLDC to initiate the process for settlement of FCR for past period immediately.

10. MSEDCL requests Hon'ble Commission to take the above additional Submission on record and consider the same while deciding the present matter.

  
Chief Engineer (Power Purchase)

MSEDCL

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

