

REPLY TO DATA GAPS-SET-2 (POST TVS)
CASE NO. 322 OF 2019

Query 1. Impact of Change in Law

- a) MSEDCL to include impact of Change in Law in Power Purchase expense of respective years of its MYT Petition.
- b) MSEDCL to separately provide table of such impact considered generator-wise for respective years

MSEDCL Reply:

MSEDCL submits that the Hon'ble commission has passed orders in following matters in respect of M/s. APML for approval of various claims under change in Law.

S.No.	Subject Matter	The period of Impact	Case No.	Date of order
1	NCDP policy as Change in law	June 2013 to 31.03.2017 i.e. 4 years	189 of 2013 and 140 of 2014	07.03.2018
2	SHAKTI policy as Change In Law	Since 01.04.2017 to Till date i.e. 2.5 years	290 of 2018	07.02.2019
3	Cancellation of Lohara Coal Block as Change in Law	From Date of commissioning till date i.e. 5 years	68 of 2012	06.09.2019
4	Carrying Cost	June 2013 to 31.03.2017 i.e. 4 years	295 of 2018	18.12.2018

Hon'ble commission in the above orders has allowed NCDP policy, SHAKTI policy, Cancellation of Lohara Coal Block as Change in Law and has allowed relief to M/s. APML for past period from 2013. These Orders are passed over a period last 1.5 years. Subsequent to the Orders of Hon'ble Commission, M/s. APML has raised claims in the respective matters. The details of claims are as follows.

Change In Law Event	Claim Type	Claims in Rs. Cr.
NCDP	Main Bill	3,094.00
	Carrying Cost	1,442.88
SHAKTI	Main Bill	2,451.05
	Carrying Cost	242.70
Cancellation Lohara Coal Block	Main Bill	3,280.61
	Carrying Cost	2,406.00
	Total	12,917.24

MSEDCL has principally challenged MERC order dated 07.02.2019 in Case No. 290 of 2018 (SHAKTI) and MERC order dated 06.09.2019 in Case No. 68 of 2012 (Lohara Coal Block) before APTEL. APMIL has challenged MERC orders dated 07.03.2018 in Case No. 189 of 2013 and Case No. 140 of 2014, order dated 07.02.2019 in Case No. 290 of 2018 demanding consideration of operational parameters such as normative SHR and GCV on as received basis alongwith compensation for 100 % shortfall. APMIL has also challenged order dated 06.09.2019 in Case No. 68 of 2019 before APTEL.

Further, regarding Inter Plant Transfer (IPT) of coal, i.e. utilization of linkage coal of APL, Mundra to APMIL, Tiroda, Hon'ble CERC has also issued order dated 31.05.2018 in Petition No.97/MP/2017 and order dated 08.07.2019 in Petition no.269/MP/2018 and has ruled that supply of coal under the FSA shall remain unchanged for the commercial purpose and shall be on account of the original Power Plant.

As the above mentioned matters are *subjudice*, the finalization of exact amount of specific payment to be made against the above claims is difficult. Further, Hon. APTEL has not granted any stay on the said orders. Hence, at present MSEDCL is liable for payment.

In similar developments, Rajasthan Electricity Regulatory Commission (RERC) vide order dated 17.05.2018 allowed NCDP 2013 as change in Law to M/s. Adani Rajasthan. Rajasthan Discom had filed appeal before APTEL and APTEL by interim order in Appeal No. 202 of 2018 passed the directives to Rajasthan Discoms to make payment of 70% of the compensation claims to

M/s. Adani Rajasthan. Rajasthan Discoms had filed a Civil appeal against APTEL Judgement before Hon'ble Supreme Court bearing no. 10188 / 2018. Hon'ble Supreme Court passed the order dated 29.10.2018 and directed Rajasthan Discoms to make payment of 50% of claim payments to M/s. APRL within two months from the date of order. Further, recently on 14.9.2019 APTEL has issued final Judgement in Appeal No. 202 of 2018 and allowed NCDP and Shakti Policy as Change in Law and also directed Rajasthan Discoms to pay the balance claims to M/s. APRL within 2 and 3 months respectively.

As per present regulations, MSEDCL recover claims of Change in Law and Carrying cost from consumers through FAC. In line with Hon'ble Supreme Court order in case no 10188 of 2018 dtd.29.10.2018, MSEDCL has made partial payment towards claims and carrying cost amounting to Rs. 2266 Cr. in respect of claims raised by M/s APML by recovering the amount through FAC to avoid carrying cost burden and contempt of court order.

However in line with Hon'ble Supreme Court order for Rajasthan Discoms to make payment of 50% of claim and considering the paid amount of Rs.2266 Crs, MSEDCL is liable to pay amount of Rs. 4192 Crs to avoid the carrying cost impact and contempt of Court Order.

Similarly, M/s. GMR had filed the Petition No. 8/MP/2014 before CERC. CERC issued the Order on 01.02.2017 and disallowed compensation on certain change in law events claimed by the M/s. GMR. Aggrieved by the decision of the Commission, M/s. GMR filed appeal A. No. 111 of 2017 before APTEL. APTEL vide its order dated 14.8.2018, remanded back the matter to CERC to pass consequential orders regarding Busy Season Surcharge, Development Surcharge, MOEF Notification on coal quality, change in NCDP and Carrying Cost.

Meanwhile, GMR had also filed a fresh Petition No. 284/MP/2018 whereby GMR included all its previous disallowed Change in Law along with fresh claim regarding SHAKTI Policy with a prayer of declaration of the same as a change in law event. CERC issued Order on 16.05.2019 and has allowed all the claims considering SHR as per CERC regulation and GCV on as received basis. MSEDCL has filed appeal on 26.07.2019 (bearing DFR No. 2221 of 2019) against CERC Order dated 16.05.2019 before APTEL. However, there is no stay on the Order.

M/s GMR Warora Energy has raised change in law bills of Rs. 162.68 Cr and details of bills are given in following table.

Description	GMR Claim in Rs.Cr.
Coal Shortfall May14 to Aug19	74.62
BSS & DS May14 to June18	35.37
Carrying cost	40.46
Late Payment Surcharge	12.23
Total	162.68

APTEL, during the hearing on 23.10.2019 directed to release 50% of payment of total claim by GMR after adjusting payments made within one week. Accordingly, MSEDCL has made payment of Rs. 81.34 Crores (i.e. 50 % of claim made by GMR).

Hence, it is submitted that balance amount of Rs. 4192 Crs to be paid is added to the revenue gap for the Control Period. MSEDCL also submits that whenever above Appeals get finality in the respective courts and the Court issues Orders in the above matter of change in law for NCDP policy, SHAKTI policy, Lohara Coal Block, etc., MSEDCL shall pass on or recover such impact through FAC mechanism.

Query 2. Transmission & SLDC charges

MSEDCL to incorporate its share in Total transmission system charges (TTSC) based on STU/SLDC Petition for the 4th MYT Control Period and revise the projection of transmission & SLDC charges

MSEDCL Reply:

MSEDCL submits that it will add following Paragraphs in the Petition.

MSEDCL submits that the STU has filed the Petition for determination of Intra-State Transmission Tariff for the MYT Control Period from FY 2020-21 to FY 2024-25. As per the said Petition MSEDCL will have following share in the Total Transmission System Cost.

Rs. Crs

Particulars	FY 20-21	FY 21-22	FY 22-23	FY 23-24	FY 24-25
MSEDCL	10,293.78	6,352.56	6,715,36	7,344.34	7,999.76

However, these charges seem to be unrealistic and on very higher side. MSEDCL while analysing the MSETCL Petition observed following:

- Historically, Hon'ble Commission has been disallowing the income tax, MSETCL has claimed Income Tax of about Rs. 957.09 Crs
- Contingency reserves shall be allowed only after investing the same in Securities as per provisions of MYT Regulations
- Return on equity at is calculated at 15.5% whereas in MTR it was allowed on 7.50%
- The impact of disallowed capitalisation from FY 2010-11 to FY 2016-17 and the revenue gap till previous gap claimed by MSETCL is subject to prudence check of Hon'ble Commission;
- Due to this, the corresponding carrying cost will also get reduced.

Therefore, MSEDCL has considered the historical trend in Intra State Transmission Charges and considering the last 4 years charges actually paid by MSEDCL, the Intra State Transmission Charges are projected as shown in following table.

Rs. Crs

Particulars	FY 15-16	FY 16-17	FY 17-18	FY 18-19	3 Yr CAGR
	Actual	Actual	Actual	Actual	
Intra State Transmission Charges	4,070	3,793	4,812.17	4,775.50	5.47%

Considering the 3 year CAGR, MSEDCL has projected the Intra State Transmission Charges. The same will be included in revised petition.

Rs. Crs

Particulars	FY 20	FY 21	FY 22	FY 23	FY 24	FY 25
	Estimated	Projected	Projected	Projected	Projected	Projected
Intra State Transmission Charges	4,867.55	5,133.95	5,414.94	5,711.30	6,023.88	6,353.57

Based on the final approval by Hon'ble Commission for Intra State Transmission Charges, above said amount shall revise.

Query 3. Opex Schemes

MSEDCL to show expected savings in O&M against each of the opex scheme due to implementation of such schemes projected for 4th Control Period

MSEDCL Reply:

MSEDCL submits that Scheme wise cost Benefit Analysis is summarized below:

Customer Care Center

In addition to address the consumer complaints for which Customer Care Centre has been established, MSEDCL has utilized Centre for follow up of payments and achievements of Outbound Campaign for payment follow-ups are as under:-

For the period Apr-2018 to Mar-2019 total no. of calls made to defaulting consumers were 5,67,046 nos. (Monthly avg 47,253 nos) and payment received was of Rs. 461.36 cr (monthly avg. Rs. 38.44 cr). For the period Apr-2019 to Dec-2019 total no. of calls made to defaulting consumers were 1,50,515 nos. (Monthly avg 16,723 nos.) and payment received is of Rs. 89.02 cr (monthly avg Rs. 9.89 cr). Outbound Campaign for payment follow-ups with defaulting consumers, helped MSEDCL in realization of revenue.

Go Green Initiative

As on Dec-2019, total no. of consumers registered for Go-Green facility are 93,068 nos .For the period Apr-2018 to Mar-2019 no. of complaints for "Non receipt of Bills"were 83829 nos (monthly avg. 6986 nos). For the period Apr-2019 to Dec-2019 no. of complaints for "Non receipt of Bills "are 36249 nos. (Monthly avg. 4027 nos). It is observed that there is reduction in no. of complaints of "Non receipt of Bills". During the period Apr-2019 to Dec-2019 the no. of Go-Green registered consumers who have availed Prompt Payment Discount are 3,38,355 nos. and bill amount paid is of Rs.49.69 cr. This helped MSEDCL in realisation of Revenue.

SMS Services

MSEDCL has issued Letter of Award to the lowest cost (L1) bidder M/s Karix Mobile Pvt. Ltd of the tender for 'Providing SMS Services to MSEDCL' for Rs. 30.20 Crores including GST @ 7.90

paaise per SMS (excluding GST) for three years. MSEDCL is spending Rs. 0.84 cr per month on SMS services. For the period Apr-2018 to Mar-2019 total no. of consumers who availed Prompt Payment Discount was 5, 49, 17,438 nos. (Monthly approx. 45 lacs consumers) and amount paid was of Rs. 7948.17 cr (monthly avg. 662 cr). For the period Apr-2019 to Dec-2019 total no. of consumers who availed Prompt Payment Discount was 4, 34, 47,518 nos. (Monthly approx. 48 lacs consumers) and amount paid was of Rs. 7051.45 cr (monthly avg. Rs. 587 cr). This helped MSEDCL in realisation of revenue.

RF-DCU (Expression of Interest & Tender)

In order to reduce the manual intervention in taking meter reading, MSEDCL has implemented RF-DCU so as to achieve 100% accuracy of readings. Further, it will reduce the existing Rs. 6 to 8.25 per consumer/meter reading charges to 7.20 Rs/reading.

Further, MSEDCL has implemented RF-DCU project in high loss town of Jalgaon, Nanded and Latur Zone on pilot basis. The detailed analysis has shown rise of 12% in sale after RF DCU based meter installation amongst above Zone. As MSEDCL is planning to implement RF-DCU all across Maharashtra, it is expected to get 1741.49 MUs annually, which can yield additional revenue of Rs. 115.28 cr. approx. also additional saving of meter reading cost of Rs.21.68 cr. approx.

Substation Monitoring System (SMS)

Implementing Substation Monitoring System (SMS), will help MSEDCL in controlling outages by bringing effective Outage Management System (OMS) of Feeders, health monitoring of equipment's and other benefits as mentioned below. Further, the revenue loss due to force outages will be reduced. Though the SMS is shown as OPEX basis, it is actually deferred CAPEX, as by making performance based payment over the 5 years and this expenditure is not a part of Regular O&M Expenses.

Benefits of Substation Monitoring System:

To MSEDCL:

- Improved monitoring and situational awareness of remote substations
- Monitoring of substation data in real time
- Reducing the work of operator like taking hourly data, recording the tripping etc.
- Substation equipment health monitoring

- Feeder Interruption analysis and computation of reliability indices such as SAIDI, SAIFI etc.
- Monitoring failures and breakdowns, Feeder load profiling, Load growth planning and management
- Feeder demand monitoring, Energy accounting
- Reporting of violations/exceptional values of different equipment in substations
- Analysis and diagnose the condition of the substation equipment
- Load balancing , Data for Load forecasting
- Data for Strategic, Managerial and Operational decisions

To Customers:

- Quick actions from MSEDCL to reduce downtime and improve customer satisfaction.
- SMS alerts facility can be extended to consumers so that consumers will know that feeder is under breakdown.

The Substation Monitoring System helps the Substation Operator/Shift In-charge to perform duties primarily operation and maintenance of Sub-Station equipment effectively.

Query 4.Receivables& Bad Debts Written Off

- a) MSEDCL to submit aging analysis of Receivables of respective years**
- b) MSEDCL to submit consumer category-wise Receivables of respective years**
- c) MSEDCL to submit aging analysis of Bad debts written off, of respective years**
- d) MSEDCL to submit consumer category-wise of Bad debts written off, of respective years**
- e) MSEDCL to submit details of around Rs. 4000 Crore of Bad debt written off in FY 2018-19**

MSEDCL Reply:

- a) and b) aging analysis of Receivables is attached herewith as Annexure “**1.Annexure 4 a.b**”.

- c) and d)MSEDCL submits that the category wise of Bad debts written off for the FY 17-18 are summarized in following table.

Sr. No.	Category	Amount (Rs. in Crs.)
A PD LT consumers having arrears less than Rs. 1000		
1	Residential	26.86
2	Commercial	3.53
3	IP	0.49
4	Other	0.50
Total		31.39
B	PD Amnesty Scheme	5.72
C	Abhay Yojana	0.09
Grand Total		37.20

MSEDCL submits that the category wise of Bad debts written off for the FY 18-19 are summarized in following table.

Category	Total Written off (Rs. Crs)
LT AG consumers	3358.36
LT PD consumers	489.99
HT industrial consumers	0.02
HT PD consumers	1.77
Consumers from Bhiwandi (DF Area)	169.20
	4019.34

- d) MSEDCL has written off arrears in respect of PD LT non Ag & AG category that are permanently disconnected before 15 years, amounting to Rs. 658 Crs and interest arrears of Rs. 3358 Crs. levied on LT AG live consumers up to Mar 2013 on principal amount prior to Mar 2013.

Category	More than 15 years W/off			Abhay yojana	PD Amnesty scheme	Prior to Mar 2013 W/off	Total W/off
	Principal	Interest	Total			AG Interest prior to Mar 2013	
LT AG consumers			0.00			3358.36	3358.36
LT PD consumers	421.78	67.66	489.44	0.10	0.46		489.99
HT industrial consumers	0.01		0.01		0.01		0.02
HT PD consumers			0.00		1.77		1.77
Consumers from Bhiwandi (DF Area)	124.71	44.48	169.20				169.20
	546.50	112.14	658.65	0.10	2.24	3358.36	4019.34

Query 5. Additional Surcharge

MSEDCL to provide justification of Additional surcharge/Backing Down in context of a) short term power purchase, b) surplus power scenario

MSEDCL Reply:

It is submitted that the Section 43 of the Electricity Act 2003 casts Universal Service Obligation (USO) on MSEDCL. Accordingly, in order to cater the consumer demand, MSEDCL purchases power on long term basis from Mahagenco, NTPC under MOU route and from IPP's through competitive bidding process. The tariff for generation as per PPA/MOU is comprised of two parts Fixed Charge which is dependent on declared availability of generator and variable charge which is dependent on actual energy supplied.

MSEDCL submits that capacity addition was done by signing the PPAs with generating companies after due approval of Hon'ble Commission and based on estimated demand as per the projections published in 16th Electric Power Supply published by CEA. However, there is a variation in projected and actual demand due to various reasons such as increase in Open Access, RE capacity addition to fulfill RPO Target, RE capacity addition by CPP because of low tariff and Net Metering etc. This is resulting into surplus power availability.

Further, MSEDCL submits that to fulfill the RPO targets set by Hon'ble Commission, MSEDCL has to plan prospective power purchase from renewable energy sources. Also, as per the RPO Regulations 2019 notified on 27th December 2019, MSEDCL is required to procure atleast 25% of power from Renewable Sources by FY 2024-25 which includes 13.5% of Solar and 11.5% of

Non-Solar power. Keeping up pace with the RPO requirement, MSEDCL has tied up total 10,795 MW capacity of Renewable Energy as on 31st October 2019 of which 7,654 MW capacity is commissioned. This includes Wind Generation of 3,999 MW, Solar of 4017 MW, Bagasse based cogeneration of 2,406 MW, Biomass capacity of 236 MW, Small Hydro of 121 MW & Municipal solid waste of 16 MW capacity. Further, by the end of FY 2024-25 to meet the RPO target, MSEDCL has planned to increase the solar capacity to 12,500 MW. Due to such addition of renewable power, the surplus power is expected to be continued further since the renewable energy is treated as "Must Run".

MSEDCL also submits that due to the recent trends in the prices of solar energy and MERC Net Metering Regulations 2019, various consumers are now converting to captive power plants (CPP) by installing solar projects through Developers. Due to this, the surplus power is also likely to be increased further.

To manage the surplus power, MSEDCL gives zero schedule/ Back down the high variable cost thermal generation as per Merit Order Dispatch or sell in Market depending upon market rates thereby reducing the burden of energy charges. However whenever such surplus capacity remains available, MSEDCL has to pay fixed/capacity charges irrespective of the scheduling or non-scheduling of power from the units which declares its availability.

Further, whenever there is unavailability of generation due to the forced outage/coal shortage, there is requirement of additional power during certain blocks of the day, sometimes the duration of shortfall during the day is so small that to cater the demand for such small period, it is unviable to take a generation unit on bar to cater the demand for small period. In such cases, MSEDCL forecast the demand, availability and shortfall on day-ahead basis and procures power from Short Tern Markets such as Energy Exchanges.

Furthermore considering the historical trend of demand, coal shortage scenario, trend of rates in Exchanges, etc. MSEDCL in advance plans and procures the power on short term through bilateral transactions on DEEP Portal.

In addition to this, MSEDCL also explores the option of optimization of power purchase cost by backing down of costly generation unit as per MoD and procuring the cheaper power available in Short Term Market/Exchange.

It is further submitted that MSEDCL has to pay Fixed Charges to the Generators as per the terms and conditions of the PPAs irrespective of utilization of generation capacity and thus the surplus capacity adds the fixed cost burden on MSEDCL.

The year wise details of net surplus capacity, back-down quantum, capacity under outages due to the coal shortage and power purchase through short term tender and IEX is given in following tables.

FY 17-18	Units under RSD,ESD & BD (MUs)	Capacity under coal shortage (MUs)	Total Surplus (MUs)	Total Short Term Purchase (MUs)
	A	B	C=A+B	D
Total MUs	18349	11443	29792	4029
Avg. MW on RTC basis	2095	1306	3401	460

FY 18-19	Units under RSD,ESD & BD (MUs)	Capacity under coal shortage (MUs)	Total Surplus (MUs)	Total Short Term Purchase (MUs)
	A	B	C=A+B	D
Total MUs	20883	15599	36482	5821
Avg. MW on RTC basis	2384	1781	4165	665

FY 19-20 (Nov-19)	Units under RSD,ESD & BD (MUs)	Capacity under coal shortage (MUs)	Total Surplus (MUs)	Total Short Term Purchase (MUs)
	A	B	C=A+B	D
Total Mus	22796	932	23727	763
Avg. MW on RTC basis	3893	159	4052	130

From above, it is clear that MSEDCL is in power surplus and will continue to be in surplus for Control Period. However, short term power is purchased for cost optimization or to meet demand during coal shortage scenario and hence, additional surcharge is justifiable & needs to be made applicable to all OA consumers.

Query 6. Capitalisation for FY 2019-20

Capitalisation proposed for FY 2019-20 of the tune of around Rs. 7,500 Crore appears high compared to actual annual capitalisation in any of the past years. Considering that only 1 quarter of FY 2019-20 is remaining, MSEDCL to submit actual capitalisation till date and revised capitalisation, if any for FY 2019-20.

MSEDCL Reply:

MSEDCL submits that the Hon'ble Commission had approved the capitalization based on the projections provided in the MTR Petition. Subsequently, various new schemes started, also additional information for few schemes is now available. MSEDCL in its Reply to Query No. 88 in Set 1 has already given the detailed justification for deviations. MSEDCL further submits that for FY 19-20, the revised capitalisation is Rs. 6,469 Crs and the impact of the revised capitalisation shall be submitted in the revised Petition. Following table provides the deviations in the major schemes against the MTR Projections.

Name of Scheme	Previous Projections in MTR	Current Projections in MYT	Difference (Rs. Crs)
DDUGJY	636.68	824.00	187.32
IPDS	722.05	962.00	239.95
DPDC	457.98	665.18	207.20
Shet Tale	0.00	156.06	156.06
Saubhagya	0.00	430.65	430.65
HVDS	0.00	1,159.78	1159.78
MSVVY	0.00	25.50	25.50
High Loss Feeder	0.00	75.00	75.00
System strengthening	0.00	125.00	125.00
NCRMP	0.00	45.00	45.00
Total Diff			3011.46

Based on the available information, the capitalisation for FY 2019-20 is Rs. 1,615 Crs.

Query 7. Wheeling Charges proposed for 4th Control Period

Wheeling Charges to be proposed in kVAh as well.

MSEDCL Reply:

MSEDCL submits that the Wheeling Charges based on the kVAh sales for the control period shall also be provided in kVAh in the revised Petition.

Query 8. Revenue Projections

For the purpose of revenue projection, category-wise PF to be considered and accordingly Revenue formats to be revised.

MSEDCL Reply:

. MSEDCL further submits that based on the available information for Apr-19 to Oct-19, MSEDCL shall use the following information for computing the category-wise PF.

Categories	Apr-19 to Oct-19		
	kWh CONSUMPTION	kVAh CONSUMPTION	PF%
HT I : HT – Industry	19,161	19,482	98%
HT II (A): HT – Commercial	1,280	1,318	97%
HT III (A): HT - Railways/Metro/Monorail Traction	47	48	97%
HT IV: HT - Public Water Works (PWW)	1,110	1,152	96%
HT V: HT – Agriculture	733	801	91%
HT VI: HT - Group Housing Societies (Residential)	124	128	97%
HT IX : HT - Public Services	643	658	98%
HT X: HT – Electric Vehicle Charging Station	3	3	99%

MSEDCL submits that revenue projections considering category-wise PF shall be submitted in the revised Petition

Query 9. Income from CSS and AS

Petitioner under table of 'Net recovery required from tariff' has considered a) Incremental revenue from CSS as Rs. 990 Crore & b) Incremental revenue from Additional surcharge as Rs. 3376 Crore. MSEDCL to submit basis & workings of the same in MS excel file.

MSEDCL Reply:

MSEDCL submits that the workings of the Incremental revenue from CSS and Additional surcharge have been enclosed in excel format as Annexure “**2.Annexure Query 9**”.

Query 10. MOD Model

MSEDCL to submit working MOD model (MS Excel) in support of the power purchase projected for 4th Control Period.

MSEDCL Reply:

MSEDCL submits that the workings of the Merit Order Despatch (MoD) have been enclosed in excel format as Annexure “**3.Annexure Query 10 a**” and the sales input for MoD is attached as Annexure “**3.Annexure Query 10 b**”.

Query 11. Energy Balance for FY 18, FY 19 upto FY 25

MSEDCL has grossed up conventional OA by 6% to arrive at input for OA consumption. However not done same in case of renewable OA. MSEDCL to justify or submit revised energy incorporating necessary changes.

MSEDCL Reply:

Since last 3-4 tariff orders, Hon'ble Commission has been grossing up only conventional OA. However, as directed by the Hon'ble Commission, MSEDCL shall submit the revised Energy Balance considering 6% input loss for renewable OA along with Revised Petition.

Query 12. Income on account of FBSM charges

a) MSEDCL to consider impact of FBSM charges receivable from other Discoms on account of recent MERC Order in the subject case. Accordingly revise the revenue projections for present or ensuing years.

b) MSEDCL to indicate year-wise & source-wise revenue expected on such account.

MSEDCL Reply:

MSEDCL submits that the Hon'ble Commission vide order dated 26.9.2019 in Case No. 297 of 2018 has given directives to MSLDC to recompute the weighted average system marginal price (WASMP) for the period from FY 2011-12 to FY 2017-18 after including the rate of power purchased from the Power Exchange and CPPs. Hon'ble Commission also directed MSLDC to follow methodology and principles approved by Hon'ble Commission vide order dated 26.09.2019 for annual fixed cost reconciliation. The same is under process at MSLDC and at this stage it is not possible to ascertain the revenue. Hence, after finalization of reconciliation by MSLDC and raising the invoices, MSEDCL will pass on the impact to consumers through FAC.

Query 13. Delayed Payment Charges

MSEDCL to submit amount of DPC collected in FY 2019-20 during H1.

MSEDCL Reply:

MSEDCL submits that the DPC collected for Apr-19 to Sep-19 works out to be Rs. 120.81 Crs.

Query 14. Wire and Supply Gap

MSEDCL to show Wire & Supply Gap/surplus separately for each year.

MSEDCL Reply:

MSEDCL submits that the Wire & Supply Gap/surplus shall be submitted separately in the revised Petition.

Query 15. Wage Revision Impact

MSEDCL to indicate wage revision impact, if any considered in MYT Petition and show the amount separately for respective years.

MSEDCL Reply:

MSEDCL submits that Pay revision effect has been given in FY 2018-19 for Rs.582.11 Crs and the same has been considered in the Petition.

Query 16. Auditor certified details of source-wise generation for FY 2017-18 & FY 2018-19.

MSEDCL should submit actual source-wise generation for FY 2017-18 & FY 2018-19 duly certified by statutory Auditor

MSEDCL Reply:

MSEDCL submits that the details of source-wise generation along with the cost for FY 2017-18 & FY 2018-19 have been enclosed in excel format as Annexure "4. Annexure Query 16". MSEDCL further submits that the details are as per the Audited Accounts which are already certified by the statutory auditors.

Query 17. Auditor certified details of category -wise revenue for FY 2017-18 & FY 2018-19

MSEDCL should submit actual category -wise revenue for FY 2017-18 & FY 2018-19 duly certified by statutory Auditor

MSEDCL Reply:

MSEDCL submits that MSEDCL submits that the details of category -wise revenue for FY 2017-18 & FY 2018-19 have been enclosed in excel format as Annexure "5. Annexure Query 17". MSEDCL further submits that the details are as per the Audited Accounts which are already certified by the statutory auditors.

Query 18. Contract Demand

MSEDCL to include separate sheet for contract demand projections in the MYT format and link it with revenue sheet for ensuing years

MSEDCL Reply:

MSEDCL submits that separate contract demand projection sheet in MYT formats shall be submitted along with the revised Petition. Accordingly, the revenue projections with linked to contract demand sheet shall also be submitted.

Query 19. Reply to query 13

a) MSEDCL to submit quantum of Power procurement from solar PV under Net-metering during FY 2017-18 & FY 2018-19

b) For FY 2017-18, total quantum of SPV is shown as 816.63 MU & not shown any other solar procurement during the year. However, while showing total quantum of solar during the FY, the value is shown as 835.63 MU. MSEDCL to rectify the discrepancy.

MSEDCL Reply:

a) MSEDCL submits that the Banked solar units at the end of Financial year procured by MSEDCL is as under

	FY 2017-18	FY 2018-19
LT Banked Units (MUS)	1.852	19.770
HT Banked Units (MUS)	1.434	5.136
Total(MUS)	3.286	24.906

b) MSEDCL submits that during FY 18-19 MSEDCL has purchased total Solar RECs of 1379 MUs. Out of which, 19 MUs were utilized for meeting the shortfall for FY 17-18. The said 19 MUs were inadvertently added in total. However, the said 19 MUs of RECs are also shown in FY 18-19. The same be ignored and total for FY 17-18 should read as 816.63 MUs only.

Query 20. Revenue from Existing & Proposed Tariff

Petitioner while estimating the Revenue from Existing Tariff as well as Proposed Tariff for FY 2020-21 to FY 2024-25 it is observed that, there is mismatch in the Category-wise Sales (MUs) as well as Contract Demand considered in Format F13.1 to F13.5 vis-à-vis in Format 14.1 to F14.5. Petitioner to rectify the highlighted discrepancy.

MSEDCL Reply:

MSEDCL submits that while projecting Revenue from Existing & Proposed Tariff for the control period in Formats 13.1 to 13.5, MSEDCL has considered Category-wise Sales in kWh and Billing Demand in kVA. While, in Formats 14.1 to 14.5, MSEDCL has considered Category-wise

Sales in kVAh as per proposed kVAh billing and Contract Demand in kVA along with the % of Billing Demand for revenue projections.

Query 21. Form 21

MSEDCL to give following details w.r.t depreciation computation for the period FY 2017-18 upto FY 2024-25.

- a) Yearly depreciation & GFA (with Asset class-wise break-up) having accumulated depreciation less than 70%**
- b) Yearly depreciation & GFA (with Asset class-wise break-up) having accumulated depreciation between 70% & 90%**
- c) Yearly depreciation & GFA (with Asset class-wise break-up) having accumulated depreciation greater than 90%**

MSEDCL Reply:

MSEDCL submits that the details of depreciation computation as desired by Hon'ble Commission shall be subsequently.

Replies to Balance Queries in Set 1

Query 32. and 48. Format Capex and Capitalization

a) The petitioner is required to provide the Cost Benefit Analysis (CBA) for the various DPR schemes approved by the Commission and is to provide the details in the template provided:

MSEDCL Reply:

MSEDCL submits that the details of Cost Benefit Analysis (CBA) for the various DPR schemes submitted to the Hon'ble Commission is summarized in following table.

Sr. No.	Name of Scheme	Reference Letter
1	Infra Plan Works	
a	Infrastructure Plan for 119 Divisions	CE(Projects)/Infra - I/MYT/35214 dtd. 21.12.2019
b	Infrastructure Plan for Akola U Div	
2	INFRA PH II	CE (Projects)/Infra-II/MYT/34769 dtd.17.12.2019
3	GFSS	CE(SPD)/ GFSS/MYT/35570 dtd. 27.12.2019
a	GFSS - II	
b	GFSS - III	
c	GFSS IV	
4	Single Phasing - Left out villages	CE(SPD)/ SPP LO/MYT/35569 dtd. 27.12.2019
5	Elimination of 66 KV line	CE(Projects)/66KV Elimination SCH/ 35127 dtd. 21.12.2019
6	APDRP	
a	Phase-II (11 Towns)	CE(Projects)/APDRP/34062 dtd. 10.12.2019
b	R-APDRP A (130 town)	CE(Projects)/RAPDRP/33868 dtd. 07.12.2019
c	R-APDRP B	CE(Projects)/RAPDRP/33868 dtd. 07.12.2019
	30 Towns	
	36 Towns	
	28 Towns	
	28 Towns	
d	Pandharpur Town	
e	SCADA Part A	CE(Projects)/RAPDRP/33868 dtd. 07.12.2019

Sr. No.	Name of Scheme	Reference Letter
7	RGGVY	CE(Projects)/ 33781 dtd. 07.12.2019
8	DDUGJY	CE(Projects)/33781 dt. 07.12.2019
9	IPDS	CE(Projects)/RAPDRP/33868 dt. 07.12.2019
10	Saubhagya Scheme	CE(Projects)/SAUBHAGYA/ 35128 dt. 21.12.2019
11	DPDC / Non-Tribal	CE (Dist)/CW-I/No.35619 dat.27.12.2019
12	DPDC / SCP	
13	DPDC / TSP + OTSP	
14	Ag Special Package for Vidarbha /Marathwada	CE (Dist)/CW-I/No.35619 dat.27.12.2019
15	Back log	CE (Dist)/CW-I/No.35619 dat.27.12.2019

Query 33. and 49 Capex-Capitalization

b) It is observed that there are differences in the title of the Schemes as approved by the Commission and as shown by MSEDCL in the current Petition and in Formats. Therefore, MSEDCL need to classify all the schemes as submitted under the current Petition and in formats of capex and capitalization into various categories viz: (i) Approved DPR, (ii) pending for approval DPR, (iii) DPR Not received and (iv) Non-DPR.

c) The Capital cost of Schemes should be shown under separate header as approved cost, actual cost and cost overrun and provide the in-principle approval no. The time phasing for the scheme should be shown by MSEDCL as approved time of completion, actual time for completion, time overrun and interest during construction due to time overrun. The following details should be provided by MSEDCL in the template given

MSEDCL Reply:

MSEDCL submits that the details of the various schemes as desired by the Hon'ble Commission is attached as Annexure "1. Annexure Query 33 and 49".