

DISCOMs

Summary of Annual Revenue Requirement (ARR) & Retail Supply Tariff (RST) Proposal Submitted by Electricity Distribution Companies of Odisha for the FY 2018-19

1. Energy Sale, Purchase and Loss

A statement of Energy Purchase, Sale and Overall Distribution Loss from FY 2012–13 to 2018-19 as submitted by DISCOM of Odisha namely Central Electricity Supply Utility of Odisha (CESU), North Eastern Electricity Supply Company of Odisha Ltd (NESCO), Western Electricity Supply Company of Odisha Ltd (WESCO) and Southern Electricity Supply Company of Odisha Ltd (SOUTHCO) is given below.

Table 1: Energy Sale, Purchase and Loss (Considering railway traction demand)

DISCOMs	Particulars	2012-13 (Actual)	2013-14 (Actual)	2014-15 (Actual)	2015-16 (Actual)	2016-17 (Actual)	2017-18 (Revised Est.)	2018-19 (Est.)
CESU	Energy Sale (MU)	4662.96	5211.93	5484.35	5570.77	5488.59	5979.19	6661.27
	Energy Purchased (MU)	7401.89	7973.19	8292.32	8366.37	8139.36	8737.92	9354.40
	Overall Distribution Loss %	37.00	34.63	33.90	33.42	32.57	31.57	28.79
NESCO	Energy Sale (MU)	3282.86	3337.83	3455.54	3806.68	4077.20 5	4411.50 7	5068.29 2
	Energy Purchased (MU)	5045.35	5045.29	5015.30	5195.58	5329.66 5	5584.18 6	6257.15 0
	Overall Distribution Loss %	34.93	33.84	31.10	26.73	23.50	21.00	19.00
WESCO	Energy Sale (MU)	3945.34	4201.07	4552.19	4597.94	4799.00	5040.00	5190.00
	Energy Purchased (MU)	6391.26	6634.90	7053.70	6941.62	6969.00	7200.00	7200.00
	Overall Distribution Loss %	38.27	36.68	35.46	33.76	31.00	30.00	28.00
SOUTHCO	Energy Sale (MU)	1660.67	1720.36	1947.73	2077.871	2141.18 1	2404.97 6	2613.41 3
	Energy Purchased (MU)	2929.88	2915.56	3192.83	3282.78	3273.45 8	3540.00 0	3700.00 0
	Overall	43.32	40.99	39.00	34.92	34.59	32.06	29.37

DISCOMs	Particulars	2012-13 (Actual)	2013-14 (Actual)	2014-15 (Actual)	2015-16 (Actual)	2016-17 (Actual)	2017-18 (Revised Est.)	2018-19 (Est.)
	Distribution Loss %							

2. AT&C Losses

The System Loss, Collection Efficiency and target fixed by OERC in reference to AT&C Loss for the four DISCOMs since FY 2012-13 onwards are given hereunder

Table 2: AT&C Loss

DISCOMs	Particulars	2012-13 (Actual)	2013-14 (Actual)	2014-15 (Actual)	2015-16 (Actual)	2016-17 (Actual)	2017-18 (Revised Est.)	2018-19 (Est.)
CESU	Dist. Loss (%)	37.00	34.63	33.90	33.42	32.57	31.57	28.79
	Collection Efficiency (%)	93.41	93.69	94.30	94.20	96.56	98.60	99.00
	AT&C Loss (%)	41.16	38.75	37.67	37.29	34.89	32.53	29.50
	OERC Approved (AT&C Loss %)	23.77	23.77	23.77	23.77	23.77	23.77	
NESCO	Dist. Loss (%)	34.93	33.84	31.10	26.73	23.50	21.00	19.00
	Collection Efficiency (%)	91.63	95.93	96.96	95.72	96.25	97.00	97.00
	AT&C Loss (%)	40.38	35.93	33.19	29.87	26.37	23.37	21.43
	OERC Approved (AT&C Loss %)	19.17	19.17	19.17	19.17	19.17	19.17	
WESCO	Dist. Loss (%)	38.27	36.68	35.46	33.76	31.22	30.00	28.00
	Collection Efficiency (%)	92.79	94.35	94.61	95.00	88.00	96.00	98.00
	AT&C Loss (%)	42.72	40.26	38.94	37.39	39.38	32.80	29.52
	OERC Approved (AT&C Loss %)	20.40	20.40	20.40	20.40	20.40	20.40	
SOUTHCO	Dist. Loss (%)	43.68	40.99	39.00	36.70	34.59	32.06	29.37
	Collection Efficiency (%)	93.88	92.39	90.75	89.43	89.90	95.00	96.00
	AT&C Loss (%)	47.13	45.49	44.64	43.39	41.20	35.46	32.19
	OERC Approved (AT&C Loss %)	26.25	26.25	26.25	26.25	26.25	26.25	

3. Data Sources

NESCO, WESCO, SOUTHCO and CESU have scrupulously complied with the information requested by the Commission for submitting the ARR and tariff for the year 2018-19. The accounts up to March 2017 have been prepared as per the Companies act as well as financial formats prescribed by the Commission. While for compilation of data and preparation of ARR the licensee has relied upon the provisional accounts up to March 2017 and actual data up to

Sep 2017. However, actual bills received from the bulk supplier, GRIDCO, transmission charges on the basis of actual energy received from OPTCL, SLDC charges on the basis of BSP rate has been taken in to account while compilation of data and preparation of ARR. Licensees have also referred data as submitted during business plan fillings.

4. Revenue Requirement for FY 2018-19

Sales Forecast

For projecting the energy sale to different consumer categories, the Licensee had analysed the past trends of consumption pattern for last seventeen years i.e. FY 2001-2002 to FY 2016-17 and actual sales data for the first six months of FY 2017-18. With this, the four distribution utilities have forecasted their sales figures for the year 2017-18 as detailed below with reasons for sales growth.

Table 3 Sales Forecast (Considering railway traction demand)

Licensee/ Utility	LT Sales for 2018-19 (Est.)		HT Sales for 2018-19 (Est.)		EHT Sales for 2018-19 (Est.)		Total Sales 2018-19 (Est.) MU
	(MU)	% Rise over FY 17-18	(MU)	% Rise over FY 17-18	(MU)	% Rise over FY 17-18	
CESU	4286.03	15.33%	1442.56	7.91%	932.70	0.71	6661.29
Remarks	Substantial increase in domestic and irrigation consumption		Substantial increase in Irrigation and Allied Agriculture and agri-industrial activity.		Flat sales forecast due to economic stagnancy. Also include energy demand by railway traction (324.74 MU)		
NESCO	2617.761	28.71	409.445	(3.65)	2041.086	4.52	5068.292
Remarks	Increase in demand is due to electrification under RGGVY, BSVY & BGJY and growth in domestic category consumers		Due to recession in steel and mining sector there is no increase in load further one of the HT consumer is shifting to EHT category		considering growth of railway traction, BRPL, Joda, Dhamara Port Company Ltd, and change of supply system of M/s Joda East Iron and Mines Ltd from 33kV (HT) to 220 kV(EHT). Also includes railway traction demand – 408.489 MU		
WESCO	2640.00	12.10%	1550.00	0.00%	1000.00	- 11.89%	5190.00
Remarks	Impact of electrification of new villages under RGGVY, BSVY & BGJY, growth in domestic category and irrigation consumption		Sale are not increasing because of recession in steel and mining sector, slowdown and temporary closure of steel & mining industries, shifting of consumers to open access. HT sales forecast also includes 40MU for railway traction		Reduction in EHT sales because industries are setting their own CPP and purchasing through open access. EHT sales forecast also includes 250MU for railway traction		

SOUTHCO	2010.495	10.69%	238.65	4.69%	364.268	1.00%	2613.413
Remarks	Around 1.47 lakh BPL consumers and 1.3 lakh APL consumers will be added by March 2018. Around 1.2 lakh consumers under RGGVY consumers will be brought in billing fold.		No substantial growth in HT is estimated. Nominal addition in consumption considered based on earlier trend .		Marginal increase as there is neither any proposal of enhancement of load from existing consumers nor any new industry is materialised. Consumption may decrease if EHT consumer draws power from open access. Also considers 137.94 MU towards railway traction.		

Inputs in Revenue Requirement for FY 2018-19

Power Purchase Expenses

The Licensees have proposed the power purchase costs based on their current BSP, transmission charges and SLDC charges. They have also projected their SMD considering the actual SMD during FY 2016-17 and additional coming in the FY 2016-17 which is as shown in table given below.

Table 4 Proposed SMD and Power Purchase Cost

DISCOMs	Est. Power Purchase in (MU)	Estimated Sales (MU)	Distribution Loss (%)	Current BSP (Paise/Unit)	Estimated Power Purchase Cost (Rs in Cr.) (Including Transmission and SLDC Charges)	SMD proposed MVA
CESU	9354.40	6661.27	28.79	274	2797.12	1752
NESCO	6257.150	5068.292	19.00	301	2040.67	1020
WESCO	7200.00	5190.00	27.92	301	2345.00	1350
SOUTHCO	3700.00	2613.413	29.37	199	829.36	650

Employees Expenses

CESU, NESCO, WESCO and SOUTHCO have projected the employee expenses of Rs 587.91 Cr., Rs 401.08 Cr., Rs 402.85 Cr. and Rs 368.56 Cr respectively for FY 2018-19. Out of these proposed employee expenses, Rs 191.61 Cr, Rs.124.72 Cr, Rs 123.30 Cr and Rs 126.21 Cr respectively are proposed for employee terminal benefit trust requirement for FY 2018-19. All the licensees have included the impact of 7th pay commission by multiplying 2.57 factor to (basic pay + Grade Pay) of 2015-16 and considered the arrears from 1.1.2016 to 31.03.2018 and included those arrears in the ensuing years salary cost.

Administrative and General Expenses

CESU, NESCO, WESCO and SOUTHCO have estimated the A&G expenses of Rs 214.30 Cr, Rs 58.73 Cr, Rs 103.04 Cr and Rs 65.77 Cr respectively based on actual expenses till September 2017. The 7% increase is taken on account of inflation on the normal A&G expenses. Apart from this, all the licensees have proposed additional A&G expenses for some of the activities as IT automation and ERP module, automated meter reading activities, replacement and shifting of meters etc. Additional A&G expenses projected by licensees are NESCO – Rs. 17.60 Cr., WESCO – Rs. 25.25 Cr., SOUTHCO – Rs. 37.51Cr. As regards CESU the proposed additional expenses is Rs. 131.81 cr out of which distribution franchisee sharing of BOT model expenses is Rs. 118.37 crore.

Repair and Maintenance (R&M) expenses

All the DISCOMs have calculated R&M expenses as 5.4% of GFA including the RGGVY, BGJY assets and future assets to be created under SAUBHAGYA scheme at the beginning of the year. With regard to the R&M of the assets created through funding of the RGGVY and BGJY schemes, Commission in Para 387 the RST order for FY 2017-18 had allowed an additional sum of Rs. 8.00 Cr to each of the DISCOMs on a provisional basis which is not enough given the area over which the RGGVY assets have been spread out. Licensees have also prayed to allow the R&M on the RGGVY & BGJY assets so that they can maintain the assets. The details of proposal under R&M expenses for ensuing financial year FY 2018-19 are given below:

Table 5 R&M Costs (Rs in Cr)

DISCOMs	GFA as at 1st April of Ensuing FY 2018-19 (Rs. Crore)	R&M (5.4% of GFA) (Rs. Crore)	Additional R&M Requested for RGGVY and BGJY assets	Total R&M Requested (Rs. Crore)
CESU	2333.70	126.02	20.00	146.02
NESCO	1662.84	89.79	--*	89.79
WESCO	1711.39	92.42	--*	92.42
SOUTHCO	2304.90	59.55	65.92	125.46

(*Additional R&M for RGGVY and BGJY assets is included in R&M (5.4% of GFA))

Provision for Bad and Doubtful Debts

CESU has considered 1% each of LT and HT billing of FY 2018-19 as provision against bad and doubtful debts. While NESCO, WESCO and SOUTHCO stated that, it is difficult for them to arrange working capital finance due to continuance of huge accumulated regulatory gaps to bridge the gap of collection inefficiency, therefore they have considered the amount equivalent to the collection inefficiency as bad and doubtful debts while estimating the ARR for FY 2018-19. NESCO, WESCO and SOUTHCO has requested the Commission to consider the mentioned amounts to enable the petitioner to recover its entire costs after duly considering the performance levels.

Table 6 Provision for Bad and Doubtful Debt

DISCOMS	Collection Efficiency (%)	Proposed Bad Debts (Rs in Cr)
CESU	99%	27.06
NESCO	97%	73.09
WESCO	97%	80.83
SOUTHCO	96%	47.71

Depreciation

All the four DISCOMs have adopted straight-line method for computation of depreciation at pre-92 rate. No depreciation has been provided for the asset creation during ensuing year. Depreciation for FY 2018-19 is projected at Rs 123.29 Cr for CESU, Rs 60.02 Cr for NESCO, Rs 61.36 Cr for WESCO and Rs 39.59 Cr for SOUTHCO.

Interest Expenses

CESU, NESCO, WESCO & SOUTHCO have submitted the interest expenses and the interest income for the FY 2018-19. The net total interest expenses proposed by these licensees are Rs 106.30 Cr, Rs 77.69 Cr, Rs 93.43 Cr and Rs 47.11 Cr respectively. The major components of the interest expenses of these licensees are as follows:

GRIDCO Loan

Commission in its Order dated 29.03.2012 and 30.03.2012 resolved the dispute on the Power Bond and the amount arrived after the settlement adjustments issued as New Loan to three DISCOMs. SOUTHCO and WESCO do not have any outstanding payable to GRIDCO towards New Loan with regard to NTPC power bond while NESCO has liability of Rs. 48.91 cr payable to GRIDCO. For CESU, no interest has been calculated on Rs. 174 Cr cash support provided by GRIDCO.

World Bank Loan Liabilities

The Distribution licensees NESCO, WESCO & SOUTHCO have calculated the interest liability of Rs 11.87 Cr, Rs 11.82 Cr and Rs 9.44 Cr respectively against the loan amount at an interest rate of 13% and repayment liability of Rs 9.10 Cr and Rs 7.26 Cr respectively for WESCO & SOUTHCO.

World Bank (IBRD) Loan

CESU has submitted that the interest on World Bank Loan has been calculated as Rs 26.587 Cr @ 13% as per the subsidiary loan & project implementation agreement with Government of Odisha.

Interest on CAPEX Loan from Govt. of Odisha

WESCO & SOUTHCO have estimated the interest at the rate of 4% p.a. on the Capex loan issued by the GoO which amounts to Rs 6.84 Cr and Rs 1.92 Cr respectively for the ensuing year. NESCO has also estimated amount of Rs. 3.41 Cr towards interest on Government of Odisha capex plan loan.

CESU has submitted one revised DPR for 17.58 crore vide case no.65 of 2017 for taking up balance works with utilisation of left out OSM Materials limiting to the available Govt .fund for an amount Rs.342.22 crores. But after introduction of IPDS & DDUGJY Scheme by Govt. Of India, the proposed scopes under CAPEX Ph-II, has already been incorporated in IPDS & DDUGJY schemes.

Interest on APDRP Loan Assistance

About loan from Govt, CESU has submitted that they have availed APDRP assistance of Rs 37.09 Cr from GOI through Govt of Odisha whose interest cost works out to be Rs 4.451 Cr.

In the ensuing year, NESCO, WESCO & SOUTHCO have estimated nothing to be expended under APDRP scheme. For the assistance already availed by the licensees previously interest @ 12% per annum has been considered for the ensuing year on the existing loan. NESCO, WESCO and SOUTHCO have estimated an interest of Rs 0.76 Cr, Rs 0.66 Cr and Rs 0.76 Cr, respectively on this account.

Interest on SI scheme Counterpart funding from REC for GoO CAPEX

SOUTHCO has existing balance of loan of Rs 2.19 Cr taken from REC for system improvement and counterpart funding against APDRP and the interest on such loan for FY 2018-19 is estimated as Rs 0.15 Cr.

Interest on Security Deposit

CESU, NESCO, WESCO and SOUTHCO have submitted that the interest on security deposits for FY 2018-19 have been worked out at 6.75% on the closing balance for 2017-18 based on the existing approval of Hon'ble Commission for FY 2017-18. This interest on security deposit proposed as Rs 46.749 Cr, Rs 33.88 Cr, Rs 44.03 Cr and Rs 12.92 Cr respectively. However, due to fall in Bank Rate SOUTHCO has proposed to reduce the rate of interest of security deposit as per prevailing Bank rate declared by RBI for FY 2018-19

5. Revenue and Truing up ARR

Non-Tariff Income

NESCO, WESCO and SOUTHCO have proposed non-tariff income for FY 2018-19 to the tune of Rs 95.41 Cr, Rs. 138.65 Cr. and Rs 17.43 Cr respectively. However, NESCO and WESCO have proposed to exclude the income from meter rent as the same is intended to be used towards replacement of the meters. CESU has proposed miscellaneous income of Rs.102.32 crore.

Provision for contingency Reserve

NESCO, WESCO and SOUTHCO have proposed provision for contingency at 0.375% of Gross Fixed Assets at the beginning of the year for FY 2018-19 The exposure towards contingency provisions is to the tune of Rs 6.24 Cr, Rs 6.42 Cr and Rs 4.07 Cr respectively.

Return on Equity/Reasonable Return

CESU has claimed Rs 11.64 Cr as ROE calculated @16% on equity capital. Rest of three Licensees submitted that due to negative returns (Gaps) in the ARR and carry forward of huge Regulatory Assets in previous years, they could not avail the ROE over the years, which otherwise would have been invested in the company for improvement of the infrastructure. As it is followed by various Commissions, the Licensees submit that the ROE to be allowed on the amount of the equity and the accrued ROE for the previous year. This would increase the availability of more funds for the consumer services. Therefore, NESCO, WESCO, SOUTHCO have assumed reasonable return amounting to Rs. 10.55 Cr, Rs. 7.78 Cr and Rs. 6.03 Cr as calculated @ 16% on equity capital including the accrued ROE as per the earlier Orders of the Commission.

Estimated Gap for FY 2017-18

Based on the actual sales, revenue and expenses for the first half of the current year 2017-18 and based on estimates for next half of current year, the uncovered gap projected for FY 2017-18 by NESCO, WESCO and SOUTHCO Utilities is Rs 92.83 Cr, Rs 180.77 Cr and Rs 215.36 Cr as against the approved surplus of Rs. 8.74 Cr, Rs 8.15 Cr and Rs 0.12 Cr respectively.

Revenue at Existing Tariff

The Licensees have estimated the revenue from sale of power by considering the sales projected for FY 2018-19 and by applying various components of existing tariffs. The total revenue based on the existing tariffs applicable for the projected sales is estimated at Rs 3290.40 Cr, Rs 2436.18 Cr, Rs 2694.41 Cr and Rs 1192.71 Cr by CESU, NESCO, WESCO and SOUTHCO respectively.

Summary of Annual Revenue Requirement and Revenue Gap

The proposed revenue requirement of DISCOMs have been summarised below:

Table 7
Proposed Revenue Requirement of DISCOMs for the FY 2018-19 (Rs in Cr) (Considering railway traction demand)

	CESU	NESCO	WESCO	SOUTH CO	Total DISCOMs
Total Power Purchase, Transmission & SLDC	2797.10	2040.67	2344.99	829.36	8012.12
Total Operation & Maintenance and Other Cost	1273.31	760.38	734.64	693.09	3461.42
Return on Equity	11.64	10.54	7.78	6.03	35.99
Total Distribution Cost (A)	4082.05	2811.60	835.86	1528.48	9257.99
Total Special Appropriation (B)	0	623.57	641.77	4.07	1269.41
Total expenditure including special appropriation (A+B)	4082.05	2817.84	3187.27	1532.55	11619.71
Less: Miscellaneous Receipt	102.32	95.41	138.65	17.43	353.81
Total Revenue Requirement	3979.73	2722.43	3048.62	1515.12	11265.9
Expected Revenue(Full year)	3290.40	2436.18	2694.41	1192.71	9613.7

GAP at existing(+/-)	(689.33)	(286.25)	(354.21)	(322.41)	(1652.20)
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Revenue GAP if Railway would avail power supply from other source:

Utilities have also project revenue gap if railway starts completely availing power supply from other source other than the Distribution Company. Revenue gap analysis of licenses is as presented below in table 8.

Table 8 Revenue Gap without Railway (Rs. Crore)

	CESU	NESCO	WESCO	SOUTHCO
Present traction contract demand (kVA)	--	142000	105500	71700
Projected railway traction energy consumption for FY 2018-19 (MU)	324.74	408.489	290	137.94
Expenditure including Special Appropriation	3973.49	2677.62	3084.95	1495.63
Reasonable return	11.64	10.55	7.78	6.03
Sub Total	3985.13	2688.17	3092.73	1501.65
Revenue from sale of power at existing tariffs	3093.75	2188.10	2513.74	1101.79
Non-Tariff Income	102.32	95.41	138.65	17.43
Total revenue gap without railway	(789.05)	(404.66)	(440.34)	(382.43)

Tariff Proposal

CESU has proposed the change in distribution wheeling tariff from 50.32 Paisa/Unit to 87.82 Paisa/Unit to meet the wheeling business revenue gap of Rs 315.85 Cr. Apart from this CESU has made some proposals on retail tariff. NESCO, WESCO and SOUTHCO have proposed to reduce the revenue gap through revision in Retail Tariff and/or Govt. subsidy as the Commission may deem fit or combination of all above as the commission may deem fit to the extent as given below.

**Table 9
Revenue Gap for Ensuing Year 2017-18 (in Rs. Crore) (Considering railway traction demand)**

	CESU	NESCO	WESCO	SOUTHCO
Revenue Gap with existing Tariff	689.33	286.25	354.21	322.41
Excess Revenue with Proposed Tariff	315.85	0	0	0
Proposed Revenue Gap	373.48	286.25	354.21	322.41

Allocation of Wheeling and Retail Supply Cost

All the licensees have submitted the allocation of wheeling and retail supply cost of their total ARR based on the Hon. Commissions Regulations on bifurcation of Wheeling and Retail Supply Business.

6. Initiatives by utility and other performance improvement measures

In compliance with RST order dated 23.03.2017, utilities have undertaken various performance improvement measures and have submitted compliance as well as benefits report in the ARR petition. Some of the initiatives by utilities are as follows.

- Printing bill in Odia Language (Direction at para 295)
- Providing various payment options to improve reach
- Mobile phone based photo billing
- Focus on business analytic and key consumer cell at field offices (SOUTHCO)
- Intensification of vigilance and enforcement activities at section level
- Development of franchisee in licensee area and exploring opportunities with SHGs as well as micro franchisees.
- Automated meter reading system and prepaid metering
- Consumer indexing
- Energy audit (details reports are included in ARR petitions)

7. Tariff Proposals and Rationalization Measures:

Proposal by CESU

CESU proposed to meet the 373.48 Cr revenue gap from the retail supply business by the way of revision of retail tariff or by adoption of tariff rationalising measures as per the following proposals:

i. Cash transactions more than 2 (Two) lakh rupees.

Hence it is proposed that as per the provision of Income Tax Act 2017 CESU cannot receive any amount more than 2lakh (In case of Security deposit) / Rs 20,000.00 (In case of other transactions) as the case may be from its consumers. In such circumstance Hon'ble commission may issued appropriate direction to specify the means of acceptance of the bill amount/Security Deposit/Additional Security Deposit as the case may be if this amount is Rs 2lakhs/Rs20,000 or above. It is proposed that in such a situation the consumer may pay the bill amount in Demand Draft, RTGS, NEFT or though online but not by cheque since there is a possibility of bounce of Cheque.

ii. Rebate on instalment

In the view of the Regulation-95 of OERC Distribution (condition of supply code) 2004, if a consumer has availed instalment facility is not eligible for rebate, whereas in Para No-495 of order 2017-18 the RST stipulates that the consumer is entitle for rebate on the amount of the monthly bill (excluding all arrears).So the applicability of rebate spelt in regulation and RST order contradicts each other.

Hence, to overcome from the difficulty CESU has proposed not to allow rebate to the consumers who are not paying their energy charges in full (including arrears) for those consumer cover under (a) & (b) Para -493 of RST 2017-18 and Regulation-95 should prevails

iii. Rebate to consumer

The Para -493 & Para-494 of RST 2017-18, the Hon'ble OERC directed incentive for early and prompt payment and some special rebate to the consumer. As per unaudited accounts for FY 2016-17 discount on consumer amounted for Rs. 58.70 Cr. Hence, CESU request to Hon'ble Commission for consideration of rebate as expenditure and same may be considered for fixation of tariff.

iv. Service Charge

As per the Para-501 of the RST order dated 23.3.2017 the Hon'ble commission have directed that, "Prospective small consumers requiring new LT single phase connection upto and including 5 kW load shall only pay a flat charge of Rs.1500/- as service connection charges towards new connection excluding security deposit as applicable as well as processing fee of Rs.25/-. The service connection charges include the cost of material and supervision charges".

Hence, CESU proposes in case the service connection material is not available with the DISCOM, DISCOM may allow the consumer to supply the material after depositing of Rs 500/- towards service connection charges which includes supervision charges

v. Rebate in case of cheque payment

Presently, CESU allow rebate to the consumer who pay the energy bill through cheque/online bank transfer/credit card on or before due date. Normally this takes 2 to 3 working days for realization of such amount through bank/settlement.

Hence, CESU proposed that the due date for bill payment through cheques shall be 3 days in advance of the normal due date for bill payment, and the due date for bill payment through online bank transfer/credit card shall be 1 day in advance of the normal due date for bill payment.

vi. Phase Contract Demand

If power supply to any consumer executed an agreement to avail power supply in phase manner and power supply was released for initial or intermediary phased demands. If the consumer may seek deferment or cancellation of such of the phased demands which are scheduled beyond minimum period of Agreement, by giving 3 months' notice in advance along with balance period of the demand charges of the Financial period (as his demand has been considered in the Annual Revenue Requirement sales projection) towards such deferment or cancellation of such phased demands

vii. Levy of transformer loss to consumer

A lot of litigation and consumer complaint has been countered on the issue transformer loss. So, CESU proposes the following for consideration by the Hon'ble Commission and pass suitable orders.

- Where the LT metering is provided for new as well as existing HT consumer and consumer owns the transformer the billing should be made either on LT units in LT tariff without adding transformer loss or on HT units (LT units + transformer loss) in HT tariff where HT and LT tariff is available for such class of consumers.
- Due to unavailability of LT supply if power supply to the consumer is given at HT even his connected load is less than 70KVA and metering is made at LT, then the consumer is to be billed on LT tariff without addition of transformer loss.
- Not to allow taking over the consumer transformer on deposit of 6% supervision charges by consumer on his request.
- If take over is allowed, then the substation is to be shifted outside the consumer premises for which the consumer shall borne the entire expenses. In such eventuality CESU can extend power supply to other consumers and can take up R&M work without consumer's interaction.
- The levy of transformer loss is applicable to Telecom Towers as laid down in Para-247 of RST Order for the Financial Year 2012-13

viii. Over drawl by existing HT/EHT category consumers.

The above category consumers pay over drawl penalty only for quantum of load over and above 120% of contract demand in off-peak hours and 100% of contract demand in peak hours. By such over drawl consumer load factor goes up and he gets tariff benefits as per the graded slab tariff structure. Over drawl also leads to Grid indiscipline warranting charges leviable under deviation settlement mechanism. So part of overdrawal penalty is passed on to the consumer as higher load factor benefit. Utility has no control on such overdrawal and in ABT regime Utility has to pay BST plus deviation settlement charges.

Therefore CESU proposed that over drawl penalty shall be levied on both demands as well as for energy charges for HT/EHT category consumers.

ix. Interest on working capital

CESU request to Hon'ble Commission for consideration (a) Operation and maintenance expenses for one month (b) Receivable for one month (c) Maintenance spares @ 40% of R & M expenses for one month as part of working capital.

x. Guideline For Net Metering

Pursuant to OERC order dated 26/11/2014 and 19.8.2016 on net metering and Solar PV Projects Connectivity, Hon. Commission has allowed third party owned Rooftop PV Net metering /bidirectional arrangement. Accordingly, Project Implementation Agreement (PIA) has been signed between GEDCOL (providing leased premises to private operator to set up roof top project), CESU and Project Developer, M/s Azure Power India Pvt. Ltd. As per this Agreement, the meter reading, both net meter and solar generation meter shall be taken by the Distribution licensee and shall form the basis for commercial settlement. But CESU shall continue to bill the consumer against its total consumption i.e. summation of energy from solar generation (i.e. Solar Consumption) and from grid energy from CESU (i.e. Grid Consumption)

as per the applicable OERC Regulations and tariff order as usual and collect the dues from consumers against its total consumption. After the collection of dues, CESU will reimburse the Energy Charges collected against the solar generation from the consumers to GEDCOL for payment to Private Operators and retain the remaining amount of energy charges and misc. charges.

CESU prays Hon'ble Commission to approve the aforesaid mechanism of commercial settlement between CESU, GEDCOL and M/s Azure Power being a Government project implemented in Government Buildings.

xi. Revenue impact of renewable power generation

Pursuant to Net Metering order dated 19.8.2016 of Hon'ble OERC, there will be an enabling environment where a good nos. of consumers from high paying domestic, commercial, Special Public Purpose category at different voltage level will go for installation of Solar Roof Top Units. Though it is an encouraging move for generation of more and more power from renewable sources, but its revenue impact on DISCOMs will have a telling effect on its financial health in days to come. As the consumers consuming energy in higher slab (or at higher tariff than the cost of supply of Rs.4.80) cross subsidies some other categories of consumers, the reduction of sales in those categories of consumers will lead to DISCOMs paying for the subsidized category of consumers on account of revenue loss; this is an additional burden on DISCOMs. There will, however, be some reduction in technical losses [commercial losses are not generally attributed to the consumers opting for solar power arrangement for obvious reasons]. From a sample calculation as shown in the table below, the revenue loss works out to be Rs. 2.36 for every unit of sole generation by its consumers and assuming saving on account of technical loss 8%, the net revenue impact will be Rs.2.17 per unit.

Hence, CESU prays Hon'ble Commission to adopt the gross generation metering where the energy bill of CESU billed as per relevant RST order will be adjusted against gross generation of meter data(Solar Generated Unit on Bulk Supply Price) of corresponding Year.

xii. Perform Achieve and Trade (PAT) Cycle-II

Clauses (i) and (k) of Section 14 of the Energy Conservation Act, 2001 stipulates that every designated consumer (DCs) shall get energy audit conducted by an accredited energy auditor and furnish the same to the concerned designated agency, details of information on energy consumed and details of the action taken on the recommendation of accredited energy auditor.

CESU being a Designated Consumer(DC) under PAT Cycle -II vide S. O. No. 1264(E) dated 31/03/2016 will engage an accredited energy auditor following a transparent procedure to conduct energy audit, wherein, the fund of approx. Rs 50 lakh is to be arranged by CESU for taking up such works.

xiii. Meter Rent

As per clause (bb) of OERC Regulation 2004 as amended upto May'11 "meter means an equipment used for measuring electrical quantities like energy in KWh or KVAh, maximum demand in KW or KVA, reactive energy KVAR hours etc. including accessories like Current Transformers (CT) and Potential Transformer (PT) where used in conjunction with such meter and any enclosure used for housing for fixing such meter or its accessories and any devices testing purposes."

Hence, CESU prays Hon'ble Commission to consider the Meter Cost along with its accessories and amount invested for fixation of meter rent. The Proposed meter rent is enclosed at Form No F.8.

Proposal by NESCO, WESCO and SOUTHCO

i. MMFC compensation for Roof Top solar to LT category of consumers

To promote generation of more solar energy in the area of utility, licenses have submitted that compensation in the shape of Monthly Minimum Fixed Charges (MMFC) to the extent of installation of solar generation capacity out of total connected load may be permitted for LT category of consumers who are willing to install roof top solar as per guidelines of Hon'ble Commission vide order dated 19.08.2016.

ii. Concessional tariff for 'Sullav Sauchalaya'

Government of India is promoting Swachha Bharat scheme by incentivising construction of toilets in rural and urban areas. Presently all such 'Sullav Sauchalay' are being billed under general purpose category where the highest slab tariff is Rs. 7.10 per unit. NESCO and WESCO requested the commission to allow concessional tariff for 'Sullav Sauchalay's available in NAC and Municipality area.

iii. Withdrawal of power factor incentives

Presently all the machines used by the industries are BSI or ISO certified, similarly pumps or motors used are energy efficient along with capacitor banks, which are the contributor of higher power factor. Hence, licensees submitted that present scenario continuance of PF incentives is no longer necessary and may kindly be abolished.

iv. Withdrawal of TOD benefits

As per RST order TOD benefit is being extended to Three phase consumers except public lighting and Emergency Supply category of consumers having own CGP for the consumption during off peak hour. Off peak hour for this purpose is from night 12.00 PM to morning 6 AM of next day. Now with the introduction of frequency based tariff significance of Off peak hour(TOD) consumption has been lost.

Consumers are reaping the benefit of frequency based tariff and intends to use accordingly as a result the load curve of most of the industries are almost flat. In such scenario continuance of TOD benefit is no more required. If continuance of TOD benefit is being permitted to the consumers, similarly the Utility's BSP may also be permitted to reduce for TOD consumption

during off peak hour. Further, consumers having contract demand more than 110Kva and above are also availing off peak hour benefit towards drawal to the extent of 120% of their contract demand without levy of penalty. So, further continuance of TOD benefit would be a double benefit for the same cause hence licensees have requested to withdraw TOD benefits.

v. Demand charges to HT medium category consumers

Due to wide gap in the demand charges, consumers under HT medium category just below 110kVA are always trying to avail demand benefit even though their load is more than 110 kVA. To curb such disparity NESCO and WESCO have submitted to fix demand charges for HT medium consumer category @Rs. 250 per kVA.

vi. MMFC for LT category of consumers

In case of Domestic, General purpose, Specified Public Purpose & PWWS the rate is same as for 1st kw as well as additional Kw. However, in case of other category the rate for additional Kw and part thereof is very much lower for which the revenue of the utility is highly affected as well as creating discrimination among LT category of consumers. In this view, Licensees have submitted to rationalized LT consumers with single rate for 1st kW or part thereof as well as additional kw or part thereof. The proposed table is given below:-

RETAIL SUPPLY TARIFF EFFECTIVE FROM 1st APRIL, 2018						
Sl. No.	Category of Consumers	Voltage of Supply	Energy Charge (P/kWh)	Monthly Minimum Fixed Charge for first KW or part (Rs.)	Monthly Fixed Charge for any additional KW or part (Rs.)	Rebate (P/kWh)/ DPS
<u>PROPOSED</u>						
LT Category						
1	Domestic					
1.a	Kutir Jyoti < 30U/month	LT		80		
1.b	Others					10
	(Consumption <= 50 units/month)	LT	250	20	20	
	(Consumption >50, <=200 units/month)	LT	430	20	20	
	(Consumption >200, <=400 units/month)	LT	530	20	20	
	(Consumption >400 units/month)	LT	570	20	20	
2	General Purpose < 110 KVA					10
	(Consumption <=100 units/month)	LT	540	30	30	
	(Consumption >100, <=300 units/month)	LT	650	30	30	
	(Consumption >300 units/month)	LT	710	30	30	
3	Irrigation Pumping and Agriculture	LT	150	20	20	10
4	Allied Agricultural Activities	LT	160	20	20	10
5	Allied Agro Industrial Activities	LT	420	80	80	DPS/Rebate
6	Public Lighting	LT	570	20	20	DPS/Rebate
7	L.T. Industrial (S) Supply	LT	570	80	80	10
8	L.T. Industrial (M) Supply	LT	570	100	100	DPS/Rebate
9	Specified Public Purpose	LT	570	50	50	DPS/Rebate
10	Public Water Works and Swerage Pumping<110 KVA	LT	570	50	50	10

vii. Billing to Irrigation and Agriculture Category of Consumers

Presently due to difficulty in putting meters in case of irrigation category of consumers billing is not possible in most of the cases. Replacement of defective meters is also not possible due to inaccessibility. In view of the same, the licensee NESCO and WESCO requested permission to bill such category of consumers on L.F. basis with L.F. of 30% considering their pump capacity.

viii. Levy of Demand Charges

Consumers with contract demand 110 kVA and above are billed on two-part tariff on the basis of actual demand and energy consumed. The Demand Charge reflects the recovery of fixed cost payable by the consumers for the reservation of the capacity made by the licensee for them. Presently the recovery of fixed cost of the Utility with 80% of CD is inadequate. In view of the same the licensee has proposed to recover the monthly demand charges on the basis of 85% of the CD or MD whichever is higher instead of 80%.

ix. Additional Rebate of 1% to LT category of Consumers

Hon'ble Commission has allowed rebate of 1% additional rebate towards digital payment for LT category of consumers. The intention was to promote cash less transaction to avoid pressure on currency notes which is also saving the time of the consumers for depositing cash in various cash collection centers. So, the licensee is intended to continue with the same for the ensuing year. Therefore, the additional rebate of 1% in addition to normal rebate as applicable may be considered for LT Domestic & Kutirjyoti category of consumers who shall make payment through digital mode only.

x. Levy of meter rent on smart, prepaid meters

In view of the revenue deficit of the Utility & for smooth operation of prepaid metering system utilities proposes as follows:

- The Meter Rent need to be reviewed and proposed the new rent of Rs 300/- Per Month and Rs 500 per Month for AMR / AMI Based /Pre-paid type single Phase Meters and three Phase meters respectively.
- The existing meter rent recovered by the Licensee from the consumers are negligible and the leasing as well as vending service charges are high enough as a result, there is a huge difference. Accordingly, the licensees may be allowed to recover difference in such recoveries and recurring costs.
- A principle may be approved by the commission for adjustment and outstanding arrearers along with its part payment before implementation of prepaid metering system.
- SOUTHCO has also requested to withdraw additional rebate of Rs. 0.25 per unit allowed in smart metering scheme.

xi. Introduction of kVAH Billing

The Hon'ble Commission in its RST Order dtd. 22.03.2014 for FY-2014-2015 had given the directions to the DISCOMs vide Para-246. As per this para the implementation of kVAh billing was declined due no non readiness of the licensees to implement the kVAh based meter readings. Further, the licensees have submitted that all the 3-phase meters, especially those installed for consumers having Contract Demand 20kW and above are enabled with all the energy parameters and storing dump record of 35 days. All such meters show instantaneous Power Factor and monthly average Power Factor can be computed as ratio of active power and apparent power drawn by consumers like in case of existing large and Medium Industries Consumers presently being billed. Hence DISCOMs are fully equipped to implement kVAh billing in respect of all those consumers in place of existing kWh Billing. Hence licensees requested to allow kVAh billing from ensuing year.

xii. Applicability of Power Factor Penalty

Licensees submitted that if the kVAh based billing proposal is not accepted by Hon Commission by any reason, then the licensees has requested continuance of power factor penalty as RST order of 2017-18 for Large Industries, Public Water Works (110 KVA and Above), Railway Traction, Power Intensive Industries , Heavy Industries , General Purpose Supply , Specific Public Purpose (110 KVA and above), Mini Steel Plant, Emergency Power Supply to CGP.

Till such time KVAH billing approach is adopted the Utility proposes for applicability of Power Factor Penalty for the following category of Consumers in order to bring more efficiency in Power System Operation.

- **LT Category:** LT industries Medium Supply, Public Water Works and Swerage Pumping > 22 KVA
- **HT Category:** Specified Public Purpose, General Purpose < 110 KVA, HT Industries (M) Supply.

xiii. Emergency power supply to Captive Power Plants (CPP)

The Emergency / Startup power requirement of Captive generators is very less but as per OERC Distribution (Condition of Supply) Code Regulations-2004 Chapter-VIII, Para-15 the emergency assistance shall be limited to 100% of the rated capacity of the largest unit in the Captive power plant of Generating Stations. As per retail supply tariff for FY-2014-15, no demand charges are payable for emergency power supplies having contract demand of 100% of the rated capacity of largest Unit.

In case of failure of the captive units, those industries draw power from the grid for their industrial consumption in the name of start-up/ Emergency power requirement of their CGP. There is hardly any spinning reserve available with the licensee to manage such huge industrial requirement of the Industries. As a result, Licensees are drawing more than their schedule during certain periods in a day resulting over drawal from State / Central grid with financial burden to the Licensee in Intra-state ABT mode of Operation. Licensees proposed to amend Para-15 of OERC Distribution (condition of supply) code.

Startup Load Requirements: It has been estimated that the start-up power required for CPPs is around 10 to 12 % of the rated capacity of highest unit and Licensees have requested Hon'ble Commission to frame norms/ guidelines for estimation of such requirement. Presently the consumers with emergency category under HT & EHT are paying only Energy Charges of Rs 7.30 & Rs 7.20 per KWH and no demand charges are applicable.

The Licensee is bound to keep reserve to the extent of their largest unit size for emergency drawal without levy of demand charges. It is a fact that in case of shut down or low generation the CGP's are requested to avail startup power for emergency requirement maximum up to 15%. In view of the above NESCO and WESCO proposed to have demand charges in addition to Energy Charges to such category of consumers. The consumers should keep CD of 15% of lowest unit of CGP with the distribution Licensee.

xiv. MMFC for Consumers with Contract Demand <110 kVA

The Monthly Minimum Fixed Charges are levied to consumers with contract demand less than 110 kVA on the recorded demand rounded to nearest 0.5 kW requiring no verification irrespective of the agreement. For billing purposes this adversely affects the Licensee in case of the recorded demand is lower than the contract demand/connected load. As the licensee is reserving the contracted capacity for the consumers at the same time they are also liable to pay the MMFC/Demand charges on the basis of CD or MD whichever is higher as like of consumers with CD of >110 kVA. In the true spirit of recovery of fixed charges, licensees proposed that the MMFC for such consumers should be levied at Contract Demand or Maximum Demand whichever is higher.

xv. Demand Charges for GP>70 kVA <110 kVA and HT Industrial (M) Supply

The consumers in the above category are required to pay demand charges of Rs. 250 and Rs. 150 per kVA respectively. In para 467 and 468 of RST order FY 17-18, demand charges are meant for consumers with contract demand of 110 and above. In the absence of clear cut guidelines for billing of demand charges to the above two category of consumers availing HT power supply are raising disputes in various forums and demanding that they are required to be billed as per para 470 of RST order FY 17-18. Presently consumers with CD more than 110 kVA are paying demand charges as per para 468 of RST order for FY 17-18

The licensee is reserving capacity for these consumers to the extent of their CD. Therefore, the utilities submitted that these two categories of consumers availing power supply in HT category and liable to pay Demand charges in kVA should also be billed on the basis of CD or MD whichever is higher irrespective of their connected load.

xvi. MMFC/Demand charges to be in kVA only instead of kVA/kW

The HT consumers and LT 3 Phase consumers are paying their demand charges/MMFC in kW and some consumers in other category in kVA. The Regulation also specifies for entering into agreement in kVA. Further, it is the responsibility of the consumers to maintain the p.f. The regulation also provides for levy of power factor penalty to these category of consumers or alternatively to bill the consumers at kVA demand. Hence, the licensees feel that there is need

to bill the consumers on kVA demand and the billing on apparent power shall bring additional income as well as will help in stability of the system. In view of this, the licensee (SOUTHCO) have submitted that they may be allowed to bill the demand charges on the basis of kVA for all the three phase consumers with static meters to avoid disparity among the consumers.

xvii. Demand Charges and Monthly Minimum Fixed Charges

The Licensees have submitted that 90% of the distribution costs is fixed cost in nature. The distribution cost of the License which is a fixed cost has increased many folds during the recent years, the said cost normally required to be recovered from the Demand Charges. The fixed cost of the power procurement by way of payment towards capacity charges has also increased during last few years. In view of this, the Licensees proposed to recover the full fixed distribution costs by suitably revising the Demand charges and monthly minimum fixed charges as proposed in earlier section, as applicable to the respective category during the ensuing year.

xviii. Continuation of bi-monthly billing

The monthly billing in rural areas is not cost effective considering the rate being charged by billing agency per bill vis-à-vis the amount billed as well as the collection activity to such subsidized category of consumers. Sometimes meter readers are trying to generate bills without moving to the consumer premises which is also not solving the basic purpose of monthly billing. Therefore, to avoid such practices the utility may be permitted to adopt bi-monthly billing system to save extra A&G cost as well as to ensure effectiveness of billing and serving the same to consumers at least where the billing amount as well as consumer coverage is low. OERC (Dist. conditions of supply code), 2004 also permits the Utility to make bimonthly billing.

xix. Introduction of Amnesty Arrear Clearance Scheme for LT Non Industrial category of consumers.

The utilities are having huge outstanding under LT non industrial category consumers. Most of the consumers, after accumulation of huge outstanding are trying to get another connection and putting the other one under Permanently Disconnected Consumers (PDC). The utility is also suffering from huge financial loss on account of low collection efficiency and coverage in Domestic and Commercial category of consumers. With this the licensees requested Hon'ble commission to approve an arrear collection scheme for LT non industrial category of consumers in line with OTS scheme earlier approved for FY 2011-12. Depending upon the outstanding and paying ability of the consumer's 6 to 12 monthly instalments may be fixed to clear the outstanding and avail benefit of withdrawal of DPS and certain percentage of waiver on outstanding amount.

xx. Special rebate for consumers availing monthly rebate under LT category (Single Phase) of Consumers

To improve collection efficiency under LT category (Single Phase) the utilities requested to approve a special rebate to those LT categories (single Phase) of consumers who are availing monthly rebate on prompt payment of monthly energy bills. Such consumers may also be permitted to avail a special rebate equivalent to the highest rebate availed during the financial year. The special rebate shall be credited at the end of the financial year if the consumer has availed rebate during last one year without fail and the outstanding is zero against such consumers.

xxi. Rebate on prompt payment

In the BSP Order for the financial year 2017-18, the Hon'ble Commission directed that the Utility is entitled to avail a rebate of 2% for prompt payment of BST bill on payment of current BST in full within two working days of presentation of BST Bills and 1% is paid within 30 days. Further, the Hon'ble Commission had directed to pay the rebate to all consumers except domestic, general purpose, irrigation and small industry category, if payment is made within three days of presentation of bill and fifteen days in case of others.

Considering the above, it is prayed before the Hon'ble Commission to approve the rebate of 2% to the Utility for prompt payment towards BST bills including part payments within 3 (three) working days from the date of presentation of the BST bill and in case the BST bill is paid after 3 (three) days the rebate should be proportionately allowed to the extent of payment made within 30th day @1% akin to Rebate Policy on Rebate is provided to GRIDCO by NTPC.

Licensees have further submitted that the above rebate may kindly be also permitted in case of part payment so that cash flow of the Bulk Supplier will improve and at the same time the utility would be tempted to remit the amount collected to GRIDCO to avail such benefit.

8. Prayer

CESU has following prayers to the Commission:

1. Admit the accompanying Aggregate Revenue Requirement and Retail business for 2018-19.
2. Approve the Aggregate Revenue Requirement (ARR) for Retail business of the Utility for the Financial Year 2018-19 as proposed by the Utility.
3. To consider the tariff related proposals submitted along with the application and approve the same.
4. To consider actual distribution and AT&C loss while approving the ARR application for FY 2018-19

5. To direct Government to provide subsidy because of lower tariff in case of BPL customers, as nos. of BPL customer will be substantially high by the end of FY 2018-19.
6. Consider the projected T&D loss of 30.16% for the FY2017-18.
7. Grant any other relief as deemed fit & proper in the facts and circumstances of the case.

NESCO, WESCO & SOUTHCO has following prayers to the Commission:

1. Take the ARR application and Tariff Petition on Record
2. Approve the Annual Revenue Requirement for FY 2018-19
3. Bridge the Revenue Gap for the FY 2018-19 through increase in Retail Supply Tariff, reduction in Bulk Supply Tariff (BST) wherever possible; grant of subsidy from the Government of Odisha as per Section 65 of the electricity act 2003.
4. To consider the AT&C Loss Trajectory accepted by Ministry of Power, GoI (SOUTHCO)
5. To do away with Intra State ABT till generators are involved (SOUTHCO)

Allow the following Tariff rationalization measures as proposed

- a. MMFC compensation to LT category of Consumers to the extent of capacity installation of Roof Top Solar as proposed.
- b. Concessional tariff to 'Sullav Sauchalay' under NAC and municipality area.
- c. Withdrawal of Power Factor Incentive & abolish TOD benefit.
- d. Introduction of L.F. Billing for irrigation and pumping category of consumers.
- e. Rationalization of MMFC charges for LT category of consumers where disparity in monthly fixed charges for 1st kw or part thereof with the additional kw or part thereof.
- f. Levy of monthly Demand charges for consumers having CD of 110 KVA and above @ 85% of CD or MD whichever is higher instead of existing level of 80% CD.
- g. Continuance of additional rebate of 1% to LT Domestic category of consumers only if payment made through digital mode/online over and above normal rebate.
- h. Industries availing power supply under Emergency category are required to keep CD of 15% with the DISCOM of the smallest unit of its CGP & Demand charges is leviable on such CD.
- i. Introduction of KVAH Billing
- j. Extending of levy of penalty on energy charges when a consumer draws power more than its contract demands.
- k. Introduction of MMFC for Consumers with Contract Demand <110 KVA on the basis of MD recorded or connected load whichever is higher.
- l. Applicability of Demand Charges for GP> 70KVA and < 110KVA and HT Industrial(M) supply

- m. 2% Rebate be allowed on payment of current monthly BST bills (excluding all arrears) within 3 days' time instead of 2 working days and also to allow rebate on part payment of BST bills.
- n. Introduction of Amnesty arrear clearance scheme for LT non industrial category of consumer.
- o. Continuation of bi-monthly billing in case of rural consumers where the billing and collection coverage is very low.
- p. Addressing of negative cash flow of the utility by giving special relief towards reduction of BST.
- q. Other Tariff rationalization measures as proposed in this application
- r. Allow the Utility to submit additional documents, modify the present petition, if so required, during the proceeding of this application.
