

**REJOINDER TO OBJECTIONS  
ON  
ARR & TRANSMISSION TARIFF APPLICATION  
FOR FY 2025-26  
&  
TRUING UP APPLICATION FOR FY 2023-24  
(CASE NO. 93/2024)**

**SUBMITTED TO  
ODISHA ELECTRICITY REGULATORY COMMISSION**



**ODISHA POWER TRANSMISSION CORPORATION LIMITED  
BHUBANESWAR - 751007**

**JANUARY 31, 2025**

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BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION,  
PLOT NO. 4, CHUNUKOLI, SAILESHREE VIHAR, CHANDRASEKHARPUR,  
BHUBANESWAR-751021.

09/CS  
17.01.25

116  
16 JAN 2025

Case No.93/2024

97  
16/01/25

In the matter of

An application for approval of Annual Revenue requirement and determination of  
Transmission Tariff as per Sc-62-64 of Electricity Act, 2003 of OPTCL for the Year 2025-26.

Dairy  
OPTCL, Bhubaneswar

AND

In the matter of

Orissa Power Transmission Corporation Ltd (OPTCL), Bhubaneswar.

In the matter of

Ramesh Ch. Satpathy, aged about 80 years, Plot No. 302(B), Beherasahi, Nayapally,  
Bhubaneswar-751012, Dist- Khurda, being the president of Upobhokta Mahasangha,  
Bhubaneswar & the Secretary of National Institute of Indian Labour.

The petitioner most Respectfully Showeth :

1. That OPTCL is a transmission license in the state of Orissa & the said company is a fully Govt. owned company for transmission of power from the generating units of the state and supply the said power to the 1 Crore consumer of Odisha through DISCOMS.
2. That, the objector being a consumer and representing the group of consumer of the state have drawn the attention to the Hon'able Commissioner to kindly direct the OPTCL to give an undertaking through an affidavit, that the supply position of the state is always stable. As because all the DISCOMs of the state have mentioned, the 33/11 KV S/s now under their control are not up to the standard, for which regular power interruption are there.
3. That, the OPTCL has to produce why the funds allotted for O&M work has not been utilized properly. Near about 58% regular posts are laying vacant in OPTCL, for which proper maintenance are not carried out by the applicant.
4. That, the OPTCL management are not paying equal salary to the outsource/ contractual workers with regular workers with equal nature of work. They should pay equal salary as they are doing equal nature of work.
5. That, the OPTCL management have not yet prepared a regulation for regularize the contractual/ outsource workers working under OPTCL, that should be done and produce before the Hon'able Commission.

That, the OPTCL management have not prepared the yardstick as per the increase systems.

That, the management has to produce the list of outsource workers category wise & division wise with the name of contractor before allowing the O&M expenses.

That, the OPTCL management has to produce the detail expenditure incurred in O&M work:

i) O&M, ii) Telecom, iii) Civil, iv) Technical since 2010 to 2024.

9. That, the OPTCL management have mentioned near about 165 nos. of sub-station & 14804 kms. Of lines are now available for operation. The OPTCL should produce the detail list of sub-stations & lines those who are outlive & not in a position to work. What action OPTCL has taken for renovation & modernization of the above line & sub-stations?

Ramesh Ch Satpathy



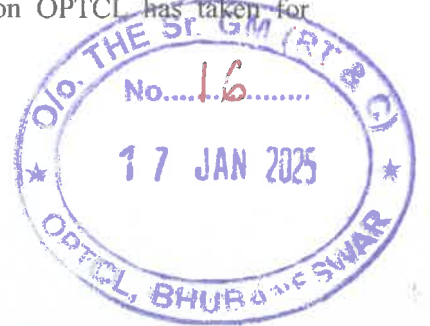
Camp Seal

Sr Gm (RT & C) ✓  
Dgm (Law)

17/1/25

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Biplab



PRAYER

Under the above circumstances I pray before the Hon'ble Commission to kindly direct OPTCL to give an undertaking through an affidavit that quality power supply with required voltage should be given to the consumers of the state. The lines and substations of OPTCL should be well managed with permanent regular manpower or otherwise the revenue requirement should not be considered for the OPTCL. The Transmission Tariff proposed by OPTCL is not acceptable as because the applicant have not taken any action on the direction of the Hon'able OERC.

*Maendh ch Sappelly*  
DEPONENT

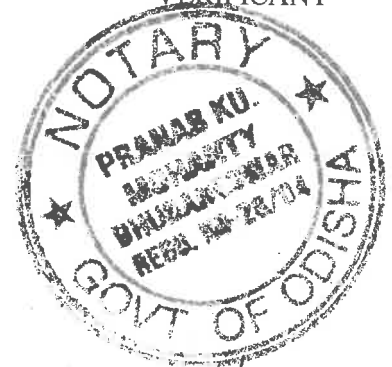
VERIFICATION

I the deponent above name to here by verify that the contents of my above affidavit are true to the best of my knowledge and not part of it is false and nothing material has been concealed there form.

Date. 13/01/2025

Bhubaneswar.

*Maendh ch Sappelly*  
VERIFICANT



*Ma*  
15-1-25

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
PLOT NO. 4, CHUNAKOLI, SAILESHREE VIHAR,  
CHANDRASEKHARPUR, BHUBANESWAR-751021

CASE NO. 93/2024  
FILING NO. 3

**IN THE MATTER OF:** (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**And**

(ii) Truing up application for FY 2023-24 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

**AND**

**IN THE MATTER OF:** Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

..... Applicant

**Vrs.**

Sri Ramesh Ch. Satpathy  
Secretary of National Institute of Indian Labour & President of  
Upobhokta Mahasangha, Bhubaneswar  
Plot No. 302(B), Beherasahi, Nayapalli,  
Bhubaneswar-751012, Dist: Khurda and 15 others.

----- Objectors

**Rejoinder to the objections raised by Objector  
Sri Ramesh Ch. Satpathy**

The humble applicant above named

**MOST RESPECTFULLY SHEWETH:**

1. That the Objector Sri Ramesh Ch. Satpathy vide affidavit dated 13.01.2025 has raised certain objections on ARR & Transmission Tariff Application of OPTCL for FY 2025-26 and Truing up application for FY 2023-24.

In reply to objections raised by the Objector, OPTCL humbly submits its rejoinder in the following paragraphs.

*Prabeer Kumar Mallik*

③



**Rejoinder to Para 1:**

The contents/statements are matters of record only.

**Rejoinder to Para 2:**

Over the years OPTCL has been continuously planning and implementing substantial no. of projects to strengthen its transmission system for ensuring quality, adequacy & reliability of power supply in the State based on requisition of DISCOMs and by approved Transmission Planning through system study. Remaining part of the said para does not concern OPTCL.

**Rejoinder to Para 3:**

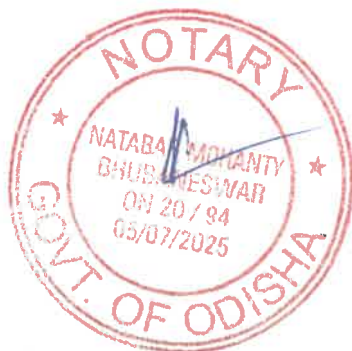
Year wise OERC approval and actual expenditure towards R&M for the period from 2013-14 to 2024-25 (up to date) are given in the Table below.

(Rs. Cr.)

Financial Year	OERC Approved	Actual
2013-14	60.00	70.20
2014-15	93.00	100.31
2015-16	108.00	113.35
2016-17	110.59	149.53
2017-18	124.97	137.83
2018-19	111.00	115.13
2019-20	115.22	125.53
2020-21	115.22	103.07
2021-22	118.61	98.86
2022-23	110.50	114.14
2023-24	135.00	130.83
2024-25 (up to December, 2024)	135.00	114.76

From the above, it can be observed that OPTCL has been effectively utilizing the R&M expenditure approved by OERC for periodical & condition based maintenance and as a result of which its Transmission system availability has been consistently more than the specified norms.

The Government of ODISHA has approved the sanctioned strength for various posts in OPTCL. A copy of the aforesaid approval is enclosed as **Annexure- 01**. Accordingly, OPTCL has been filling up the vacancies in a phased manner.



*Poabear Kumar Mallick*

**Rejoinder to Para 4:**

The outsourced / contractual workers are paid/ remitted minimum rate of wages as notified by the labour & ESI department, Govt. of Odisha from time to time or consolidated remuneration as fixed by the management of OPTCL.

**Rejoinder to Para 5:**

Contractual / outsource workers are engaged in OPTCL on as and when requirement basis through manpower / job outsourced basis. Each of the Contractors / Agencies is selected through tender basis by annually / biennially.

**Rejoinder to Para 7:**

The list of outsourced workers engaged in OPTCL is furnished as **Annexure- 02.**

**Rejoinder to Para 8:**

The detailed expenditure incurred towards R&M works under different heads executed by OPTCL during FY 2010-11 to FY 2024-25 (up to Dec-24) is furnished as **Annexure- 03.**

**Rejoinder to Para 9:**

At present OPTCL is operating with 197 numbers of GSS and around 16600.348 Ckt. kms. of EHT lines. Regular maintenance of all the GSS along with the associated lines are carried out through well experienced staffs. Further, time to time augmentation / renovation / modernization of required GSS and up gradation / replacement of essential EHT lines have been carried out by OPTCL to maintain quality power supply to the consumers. OPTCL is strategically replacing/upgrading conductors in old EHT lines on priority basis for reduction in Transmission loss and to cater the load demand reliably. Also up-gradation and Modernization of Old Grid Sub-stations are being done by replacing the obsolete/outdated equipment with the objective to keep the assets in efficient working condition. So, there are no such GSS & lines which have outlived or not in a position to work.

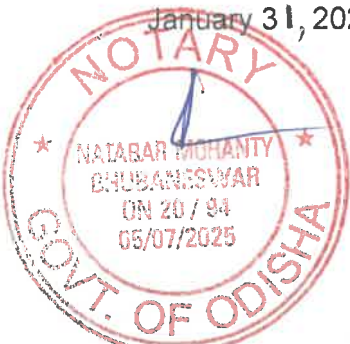
2. The objections not specifically admitted & commented are deemed to have been denied.

**PRAYER**

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of Sri Ramesh Ch. Satapathy while approving ARR and Transmission Tariff of OPTCL for FY 2025-26 and Truing up application for the FY 2023-24.

Bhubaneswar  
January 31, 2025

By the Applicant  
Through  
*Prabeer Kumar Mallik*  
Sr. GM (RT&C)





**GOVERNMENT OF ODISHA  
DEPARTMENT OF ENERGY**

\*\*\*\*\*

No.Estt.OPTCL-02/2013 10919 /En Dated the 20/12/2013

From:-

Sri Srikanta Nayak  
Additional Secretary to Government.

To

The Director (HRD),  
Odisha Power Transmission Corporation Limited,  
Janpath,  
Bhubaneswar-751022

Sub:-Approval of the final report on Organisation Restructuring & Manpower  
Assessment of Odisha Power Transmission Corporation Limited.

Sir,

I am directed to invite a reference to your letter No.21446 dated 31.12.2012 on the subject cited above and to say that, after careful consideration Government have been pleased approve the restructuring proposal of Odisha Power Transmission Corporation Limited with creation of total 432 numbers of posts which includes increase of 471 posts in executive positions and reduction of 39 posts in non-executive category posts in the following manner:-

Designation	Pay Band Existing	Existing Sanctioned Strength	Creation (2013-18)	Strength after re-structuring
<b>A. Executive</b>				
CGM	PB-4	4	5	9
Sr.GM/GM	PB-4	24	12	36
DGM/AGM/Mgr	PB-3	195	281	476
DM/AM	PB-3	957	194	1151
Jr.Mgr & Others	PB-2	395	-21	374
<b>Total (A)</b>		<b>1575</b>	<b>471</b>	<b>2046</b>
<b>B. Non-Executive</b>				
Administrative	PB-1	1053	-572	481
Technical	PB-1/PB-2	2524	900	3424
Others	PB-1	413	-367	46
<b>Total(B)</b>		<b>3990</b>	<b>-39</b>	<b>3951</b>
<b>Total(A+B)</b>		<b>5565</b>	<b>432</b>	<b>5997</b>

- II. OPTCL is allowed to fill up the vacancy and posts so created/upgraded during the year 2013-14 to 2017-18, as and when the projects will be taken up or Grids will be commissioned, as per the approved norms sanctioned by the Board of Directors of OPTCL in respect of those units and as per the recruitment plan indicated in the enclosed statement.

- III. The manpower proposed for substation maintenance in 132 KV, 220 KV and 400 KV Grids are to be reduced proportionately in the category of Electrical Engineer and ITI Technicians. The number of O&M circles would not exceeds eight nos. at any given point of time in future.
- IV. The personnel deployed in projects upon its completion will be redeployed/ relocated to other projects site. However, abolition of project circles/divisions/ subdivisions will be subject to the review by the Board of Directors of OPTCL.
- V. Financial expenses for the additional manpower would be allowed by OERC as a pass through expenses towards employees cost of annual revenue requirement in every financial year. The expenditure on this account will be borne by OPTCL without any budgetary support of the State Government.
- VI. The recruitment plan arising out of new creation, retirement and attrition for the period from 2013-18 will be taken up in a staggered manner to ensure planned induction of skilled manpower in Executive and Non-Executive category.
- VII. The proposal for allowing PB-3 to the post of Assistant Manager/Deputy Manager is approved.
- VIII. This has been concurred in by Finance Department in their U.O.R No.128/W.F-II dated 23.08.2013.

Encl:- As above

Yours faithfully,

Additional Secretary to Government

Memo No. 10920 /En Dated 20/12/2013

Copy forwarded to Finance Department/Public Enterprises Department/ Chairman, O.E.R.C, Bhubaneswar for information and necessary action.

Additional Secretary to Government

Memo No. 10921 /En Dated 20/12/2013

Copy forwarded to P.S to Minister, Energy/ P.S to Chief Secretary/P.S to Commissioner-cum-Secretary to Government, Department of Energy for information and necessary action.

Additional Secretary to Government

(7)

**Creation of Post(2013-18) Grade & Yearwise**

Position	Existing Sanctioned Strength	Proposed Manpower (2013-14)	Creation/Reduction	Proposed Manpower (2014-15)	Creation/Reduction	Proposed Manpower (2015-16)	Creation/Reduction	Proposed Manpower (2016-17)	Creation/Reduction	Proposed Manpower (2017-18)	Creation/Reduction	Total Creation (2013-18)	Strength after re-structuring
CMD	1	1	0	1		1		1		1		0	1
Director	4	4	0	4		4		4		4		0	4
Chief Vigilance Officer	0	1	1	1		1		1		1		1	1
Sub Total	5	6	1	6		6		6		6		1	6
Electrical													
CGM	2	3	1	3		3		3		3		0	0
GM/Sr.GM	15	24	9	24		25	1	25		25		1	3
Manager/AGM/DGM	120	270	150	286	16	317	31	315	-2	337	22	10	25
AM/DM	749	690	-59	753	63	843	90	848	5	918	70	217	337
Jr.Manager	241	134	-107	141	7	153	12	158	5	171	13	169	918
Sub Total	1127	1121	-6	1207	86	1341	134	1349	8	1454	105	-70	171
Civil													
GM/Sr.G.M	0	1	1	1		1		1		1		0	0
Manager/AGM/DGM	0	3	3	3		3		3		3		1	1
AM/DM	4	11	7	11		11		11		11		3	3
Jr.Manager	24	13	-11	15	2	17	2	18	2	20	2	7	11
Sub Total	28	28	0	30	2	32	2	33	1	35	2	-4	20
F&A													
CGM	1	2	1	2		2		2		2		7	35
GM/Sr.GM	3	3	0	3		3		3		3		0	0
Manager/AGM/DGM	29	33	4	33	0	34	1	34	1	34		1	2
AM/DM	74	68	-6	71	3	77	6	78	1	82	4	0	3
Jr.Manager	46	65	19	66	1	66	1	66	1	66		5	34
Sub Total	153	171	18	175	4	182	7	183	1	187	4	8	82
HR													
CGM	1	1	0	1		1		1		1		20	66
GM/Sr.GM	2	3	1	4		3		3		3		34	187
Manager/AGM/DGM	14	20	6	20		20		20		20		0	0
AM/DM	20	37	17	37		37		37		37		0	1
Jr.Manager	23	18	-5	18		18		18		18		1	3
												6	20
												17	37
												-5	18

Position	Existing Sanctioned Strength	Proposed Manpower (2013-14)	Creation/Reduction	Proposed Manpower (2014-15)	Creation/Reduction	Proposed Manpower (2015-16)	Creation/Reduction	Proposed Manpower (2016-17)	Creation/Reduction	Proposed Manpower (2017-18)	Creation/Reduction	Total Creation (2013-18)	Strength after re-structuring
<b>Sub Total</b>	60	79	19	80	0	79	0	79	0	79	0	19	79
<b>Telecom</b>													
CGM	0	1	1	1		1		1		1		1	1
GM/Sr.G.M	1	2	1	2		2		2		2		1	2
Manager/AGM/DGM	9	41	32	44	3	49	5	50	1	54	4	45	54
AM/DM	70	46	-24	49	3	54	5	55	1	59	4	-11	59
Jr.Manager	38	59	21	65	6	75	10	77	2	85	8	47	85
<b>Sub Total</b>	118	149	31	161	12	181	20	185	4	201	16	83	201
<b>IT</b>													
CGM	0	1	1	1		1		1		1		1	1
GM.Sr.G.M	2	1	-1	1		1		1		1		-1	1
Manager/AGM/DGM	7	10	3	10		10		10		10		3	10
AM/DM	18	22	4	22		22		22		22		4	22
Jr.Manager	6	6	0	6		6		6		6		0	6
<b>Sub Total</b>	33	40	7	40		40		40		40		7	40
<b>Industrial Engineering</b>													
AM/DM		1	1	1		1		1		1		1	1
<b>Safety</b>													
CGM(Safety)		1	1	1		1		1		1		0	0
<b>Corporate Affairs</b>													
Company Secretary	1	1	0	1		1		1		1		0	1
Asst.Company Secretary	1	1	0	1		1		1		1		0	1
<b>Sub Total</b>	2	2	0	2		2		2		2		0	2
<b>Corporate Relation</b>													
Manager/AGM/DGM	1	1	0	1		1		1		1		0	1
AM/DM	2	1	-1	1		1		1		1		-1	1
Jr.Manager		1	1	1		1		1		1		1	1
<b>Sub Total</b>	3	3	0	3		3		3		3		0	3
<b>Economist</b>													
Economist	1	1	0	1		1		1		1		0	1
<b>Legal</b>													
Legal			0	0								0	0

Position	Existing Sanctioned Strength	Proposed Manpower (2013-14)	Creation/Reduction	Proposed Manpower (2014-15)	Creation/Reduction	Proposed Manpower (2015-16)	Creation/Reduction	Proposed Manpower (2016-17)	Creation/Reduction	Proposed Manpower (2017-18)	Creation/Reduction	Total Creation (2013-18)	Strength after re-structuring
Manager/AGM/DGM (LAW)	2	4	2	4		4		4		4		2	4
AM/DM (LAW)	2	2	0	2		2		2		2		0	2
<b>Sub Total</b>	<b>4</b>	<b>6</b>	<b>2</b>	<b>6</b>		<b>6</b>		<b>6</b>		<b>6</b>		<b>2</b>	<b>6</b>
<b>Medical</b>													
Medical officer / IC	1	1	0	1		1		1		1		0	1
Doctor/Specialist ( on deputation)	2	2	0	2		2		2		2		0	2
Asst Medical Officer	1	1	0	1		1		1		1		0	1
<b>Sub Total</b>	<b>4</b>	<b>4</b>	<b>0</b>	<b>4</b>		<b>4</b>		<b>4</b>		<b>4</b>		<b>0</b>	<b>4</b>
<b>Estate</b>													
Land Officer ( on deputation)	1	2	1	2		2		2		2		1	2
Forest Officer (retired/ deputation)	0	1	1	1		1		1		1		1	1
Police Officer (deputation)	0	1	1	1		1		1		1		1	1
<b>Sub Total</b>	<b>1</b>	<b>4</b>	<b>3</b>	<b>4</b>		<b>4</b>		<b>4</b>		<b>4</b>		<b>3</b>	<b>4</b>
<b>Secretarial</b>													
Sr.P.S	5	5	0	5		5		5		5		0	0
PS:PA	18	17	-1	17		17		17		17		-1	17
<b>Sub Total</b>	<b>23</b>	<b>22</b>	<b>-1</b>	<b>22</b>		<b>22</b>		<b>22</b>		<b>22</b>		<b>-1</b>	<b>22</b>
<b>Others</b>													
Drafting (E2)	1		-1									0	0
AM (SLDC)	1		-1									-1	0
Shipping (E3)	1		-1									-1	0
Executive Asst (E3)	1		-1									-1	0
Environment(E3)	1		-1									-1	0
Civil Policy(E5)	1		-1									-1	0
Contract (E5)	1		-1									-1	0
Corporate Planning (E5)	2		-2									-2	0
Database (E5)	1		-1									-1	0

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Position	Existing Sanctioned Strength	Proposed Manpower (2013-14)	Creation/Reduction	Proposed Manpower (2014-15)	Creation/Reduction	Proposed Manpower (2015-16)	Creation/Reduction	Proposed Manpower (2016-17)	Creation/Reduction	Proposed Manpower (2017-18)	Creation/Reduction	Total Creation (2013-18)	Strength after restructuring
Environment (E6)	2		-2										0
Corporate Planning (E7)	1		-1										0
Sub Total	13		-13										0
Total (Executives)	1575	1638	63	1743	104	1905	163	1919	14	2046	127	471	2046
<b>NON EXECUTIVE POSTS</b>													
Administrative posts													0
OA -MINISTERIAL (GR.I/II Asst., LD Asst., Diarist, Clerks, Clerk-cum-Comp.Asst.)	651	436	-215	458	22	499	41	499		527	28	-124	527
Accountant / Jr.Accountant	59		-59										0
Issue Supdt./ Typist/Comp.Asst	12		-12										0
Steno Gr.I/II/III	70	40	-30	40		41	1	41		41		-12	0
Receptionist	4	3(Outsourced)		3(Outsourced)		3(Outsourced)		3(Outsourced)		3(Outsourced)		-29	41
LAND ( Senior Revenue Inspector ,Revenue Inspector ,Asst Revenue Inspector,Amin)	7	12	5	12		12		12		12		5	12
Khansama /Cook	1	0	-1	0		0		0		0		-1	0
Daftary	2	0	-2	0		0		0		0		-2	0
Zamadar	5	0	-5	0		0		0		0		-5	0
Peon	334	0	-334	0		0		0		0		-334	0
Attendant	6	0	-6	0		0		0		0		-6	0
Sweeper	3	0	-3	0		0		0		0		-3	0
Mali	2	0	-2	0		0		0		0		-2	0

(=)

Position	Existing Sanctioned Strength	Proposed Manpower (2013-14)	Creation/Reduction	Proposed Manpower (2014-15)	Creation/Reduction	Proposed Manpower (2015-16)	Creation/Reduction	Proposed Manpower (2016-17)	Creation/Reduction	Proposed Manpower (2017-18)	Creation/Reduction	Total Creation (2013-18)	Strength after re-structuring
Sub Total Administrative	1156	488	-664	510	22	552	42	552	0	580	28	-572	584
<b>TECHNICAL</b>													
<b>CATEGORY(Non Executive)</b>													
IT Asst	1	1	0	1		1		1		1		0	0
Instructor	3	4	1	4		4		4		4		0	1
Telephone Operator	5	Outsource	-5	3(Outsourced)		3(Outsourced)		3(Outsourced)		3(Outsourced)		1	4
<b>Sub Total</b>	<b>9</b>	<b>5</b>	<b>-4</b>	<b>5</b>	<b>0</b>	<b>5</b>	<b>0</b>	<b>5</b>	<b>0</b>	<b>5</b>	<b>0</b>	<b>-5</b>	<b>0</b>
<b>Electrical</b>			<b>0</b>									<b>-4</b>	<b>5</b>
Foreman /												<b>0</b>	<b>0</b>
Sr.Chargeman(EI)	124	82	-42	86	4	93	7	97	4	106	9	-18	106
Electrician A/B/C	163	186	23	214	28	245	31	253	8	277	24	114	277
LinemanA/B/C	449	532	83	582	50	638	56	664	26	724	60	275	724
Operator A/B/C	396	440	44	508	68	568	60	588	20	644	56	248	644
Helper (Unskilled/Semi Skilled)(SSA-EI)	1104	1022	-82	1118	96	1241	123	1267	26	1375	108	271	1375
<b>Sub Total</b>	<b>2236</b>	<b>2262</b>	<b>26</b>	<b>2508</b>	<b>246</b>	<b>2785</b>	<b>277</b>	<b>2869</b>	<b>84</b>	<b>3126</b>	<b>257</b>	<b>890</b>	<b>3126</b>
<b>Telecom</b>												<b>0</b>	<b>0</b>
Foreman /	5	12	7	15	3	20	5	21	1	25	4	20	25
Sr.Chargeman(TC)													
Technician A/B/C (Telecom)	130	57	-73	63	6	73	10	75	2	83	8	-47	83
Helper (Unskilled/Semi Skilled)(SSA-TC)	85	87	2	96	9	111	15	114	3	126	12	41	126
<b>Sub Total</b>	<b>220</b>	<b>156</b>	<b>-64</b>	<b>174</b>	<b>18</b>	<b>204</b>	<b>30</b>	<b>210</b>	<b>6</b>	<b>234</b>	<b>24</b>	<b>14</b>	<b>234</b>
<b>Medical</b>												<b>0</b>	<b>0</b>
Medical Technician	1	1		1		1		1		1		0	1
Pharmacist	1	1		1		1		1		1		0	1
Dresser	1	2	1	2		2		2		2		1	2
Nurse	0	1	1	1		1		1		1		1	1
Medical Attendant	0	1	1	1		1		1		1		1	1

Position	Existing Sanctioned Strength	Proposed Manpower (2013-14)	Creation/Reduction	Proposed Manpower (2014-15)	Creation/Reduction	Proposed Manpower (2015-16)	Creation/Reduction	Proposed Manpower (2016-17)	Creation/Reduction	Proposed Manpower (2017-18)	Creation/Reduction	Total Creation (2013-18)	Strength after re-structuring
<b>Sub Total</b>	<b>3</b>	<b>6</b>	<b>3</b>	<b>6</b>	<b>0</b>	<b>6</b>	<b>0</b>	<b>6</b>	<b>0</b>	<b>6</b>	<b>0</b>	<b>3</b>	<b>6</b>
Driver	248		-248									-248	0
Draftsman	52		-52									-52	0
Drawing Supdt.	1		-1									-1	0
Cad Operator	5		-5									-5	0
<b>Sub - Total</b>	<b>306</b>		<b>-306</b>									<b>-306</b>	<b>0</b>
<b>Sub Total (Technical)</b>	<b>2774</b>	<b>2429</b>	<b>-345</b>	<b>2693</b>	<b>264</b>	<b>3000</b>	<b>307</b>	<b>3090</b>	<b>90</b>	<b>3371</b>	<b>281</b>	<b>597</b>	<b>3371</b>
Civil			0									0	0
Work Sarkar	15		-15									-15	0
Carpenter	14		-14									-14	0
Plumber B/C	14		-14									-14	0
Pump Operator	3		-3									-3	0
Others	14		-14									-14	0
Sub-Total	60	0	-60	0		0		0		0		-60	0
<b>TOTAL (Non Executive)</b>	<b>3990</b>	<b>2917</b>	<b>-1073</b>	<b>3203</b>	<b>286</b>	<b>3552</b>	<b>349</b>	<b>3642</b>	<b>90</b>	<b>3951</b>	<b>309</b>	<b>-60</b>	<b>0</b>
<b>TOTAL (Executive+ Non Executive)</b>	<b>5565</b>	<b>4555</b>	<b>-1010</b>	<b>4946</b>	<b>390</b>	<b>5457</b>	<b>512</b>	<b>5561</b>	<b>104</b>	<b>5997</b>	<b>436</b>	<b>432</b>	<b>5997</b>



OPTCL SS MIP VAC DATA AS ON 29.01.2025 (EXECUTIVES)				
POSTS	S/S (Govt. approved)	MIP	VACANCY	
ELECTRICAL	1454	1023	431	
TELECOM	201	69	132	
CIVIL	35	22	13	
IT	40	25	15	
FIN	187	145	42	
HRD	80	40	40	
CORPORATE AFFAIRS	2	2	0	
ECONOMIST	1	0	1	
ESTATE*	4	0	4	
HOSPITAL*	4	0	4	
SECRETARIAL	22	6	16	
LEGAL	6	4	2	
MECH	0	1	-1	
CR	3	1	2	
CMD	1	1	0	
DIR (OP)	1	1	0	
DIR (PROJ)	1	0	1	
DIR (FIN)	1	0	1	
DIR (HRD)	1	1	0	
DIR(SLDC)	1**	1	0	
CGM (SAFETY)	1	1	0	
CVO	1	0	1	
<b>TOTAL</b>	<b>2047</b>	<b>1343</b>	<b>704</b>	

\* Post sanctioned for deputation from Govt. of Odisha

\*\* The post of Dir (SLDC) is sanctioned in Govt. approved structure of SLDC

OPTCL SS MIP VAC DATA AS ON 29.01.2025 (NON-EXECUTIVES)				
SL.NO.	POSITION	S/S (Govt. approved)	MIP	VACANCY
<b>A</b>	<b>ADMINISTRATIVE CATEGORY</b>			
A.1	OFFICE ASSISTANT	527	185	342
A.2	STENOGRAPHER	41	6	35
A.3	LAND (SENIOR REVENUE INSPECTOR, REVENUE INSPECTOR, ASSISTANT REVENUE INSPECTOR, AMIN)	12	0	12
<b>B</b>	<b>TECHNICAL CATEGORY</b>			
B.1	IT ASSISTANT	1	0	1
B.2	INSTRUCTOR	4	0	4
B.3	ELECTRICAL	3126	998	2128
B.4	TELECOM	234	72	162
B.5	MEDICAL	6	2	4
<b>C</b>	<b>OTHERS (EX-CADRE)***</b>	<b>0</b>	<b>105</b>	<b>-105</b>
	<b>GRAND TOTAL</b>	<b>3951</b>	<b>1368</b>	<b>2583</b>

\*\*\* The Ex-Cadre category will continue till the retirement of the existing employees.

Sl. No.	Name of the Agency	Category	Division Wise
1	M/S OMM SARALA SECURITY SERVICE PVT. LTD.	Data Entry Operator- 29	1) HQRS-25 2) SLDC-02 3) Store & Services Circle, BBSR-01 4) Telecom S/D, BBSR-01
		Attendants- 44	1) HQRS - 27 2) SLDC -02 3) EHT (O&M) Division, Puri -01 4) EHT (Const.) Division, Berhampur -01 5) EHT (O&M) Circle, Cuttack -01 6) EHT (Const.) Division, Jharsuguda -01 7) EHT (O&M) Division, Jharsuguda - 01 8) ED, Southren Zone, Berhampur-02 9) ED, Western Zone, Burla-02 10) ED, Nothern Zone, Balasore-04 11) ED, Central Zone, Bhubaneswar-02
2	M/S MANOJ KUMAR ROUTRAY	Graduate Technical Resource Personnel Electrical - 11 Telecom - 07 Junior Technical Resource Personnel Telecom - 02	<u>GTRP (Electrical)</u> 1) EHT (O&M) Division, Jayanagar-01 2) EHT (O&M) Division., Paradeep-02 3) EHT (O&M) Division, Cuttack - 01 4) EHT (O&M) Division, Choudwar-01 5) EHT (O&M) Division, Khurda - 01 6) EHT (O&M) Division, Puri -01 7) EHT (O&M) Division, Bhubaneswar -01 8) EHT (O&M) Division, Balasore -02 9) EHT (O&M) Division, Chainpal -01  <u>GTRP (TELECOM)</u> 1) Telecom Division, Jeypore-01 2) Telecom Division, Meramundali-01 3) Telecom Divisor. Cuttack-02 4) Telecom Division Jajpur Road-02 5) Telecom Division Bhubaneswar-01 <u>JTRP (Telecom)</u> 1) Telecom Division, Berhampur-01 2) Telecom Division, Cuttack -01
		Content Designer-01	HQRS-01
		Nurse (Female) - 01	Power Hospital-01
		Physiotherapist - 01	Power Hospital-01
		Lab Technician - 01	Power Hospital-01
		Dresser - 01	Power Hospital-01
		Driver - 05	1) HQRS - 02 2) EHT (Const.) Division, Bolangir -01 3) ED Northen Zone, Balasore -01 4) EHT (Const.) S/D No-II, OPTCL, BBSR-01
		Attendant - 03	1) Power Hospital -01 2) Transit House - 01 3) Power Community Centre -01
		Gardener-02	HQRS 02

**Details of expenditure made on Repair & Maintenance as per audited accounts**

Head of Expenditure / Year	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25 (upto Dec'2024) unaudited
(i) Building	0.96	2.46	6.76	4.22	6.74	9.79	14.96	11.01	13.88	16.36	11.47	9.33	7.48	10.33	3.70
(ii) Plant and machinery	21.52	29.60	33.41	40.83	52.76	58.44	86.58	89.47	66.68	65.97	60.74	58.51	75.08	76.50	79.15
(iii) Lines cables and network assets	2.96	10.54	14.74	20.01	16.13	38.34	43.13	32.92	27.48	38.84	26.87	25.60	23.24	28.14	20.13
(iv) Electrical installations		-		1.24	19.04	1.84	1.15	0.90	1.25	0.96	1.65	0.99	1.65	8.96	7.20
(v) Vehicle	0.24	0.18	0.21	0.16	0.13	0.16	0.14	0.13	0.12	0.08	0.10	0.11	0.09	0.06	0.01
(vi) Furniture and fixtures	0.48	0.45	0.52	0.01	0.01	0.01	0.02	0.02	-	0.02	0.01	0.03	0.02	0.03	0.06
(vii) Office equipments	2.09	1.92	3.30	2.25	3.95	4.28	2.19	1.99	3.34	3.30	2.23	2.59	5.47	4.37	2.49
(viii) Other civil works	0.07	0.55	1.31	1.47	1.55	0.49	1.36	1.39	2.38			1.70	1.11	2.45	2.01
<b>TOTAL</b>	<b>28.32</b>	<b>45.70</b>	<b>60.25</b>	<b>70.19</b>	<b>100.31</b>	<b>113.35</b>	<b>149.53</b>	<b>137.83</b>	<b>115.13</b>	<b>125.53</b>	<b>103.07</b>	<b>98.87</b>	<b>114.14</b>	<b>130.83</b>	<b>114.76</b>

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION,  
BIDYUT NIYAMAK BHAWAN.  
PLOT No-4, CHUNOKOLI, SHAILASHREE VIHAR, BHUBANESWAR-751021

Case No. 93 of 2024

**IN THE MATTER OF:** An Application under Sections 62 & 64(2) and all other relevant provisions of the Electricity Act, 2003 read with OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and OERC Regulation 53 (7) of the OERC (Conduct of Business) Regulations, 2004 for approval of Aggregate Revenue Requirement and Determination of Transmission Tariff for the FY 2025-26 along with Truing up application for FY 2023-24 filed by Odisha Power Transmission Corporation Ltd. (OPTCL) before the Odisha Electricity Regulatory Commission, Bhubaneswar-21.

**IN THE MATTER OF:** M/s OPTCL (RTAC)

...Petitioner

**IN THE MATTER OF:** TP Central Odisha Distribution Limited (TPCODL)

...Respondent

Affidavit

Bharat Kumar Bhadawat, aged about 53 Years, son of late Shri Shankar Lal Bhadawat residing at Bhubaneswar do hereby solemnly affirm and say as follows:

I am the Chief-Regulatory & Enforcement of TP Central Odisha Distribution Ltd. the Respondent in the above matter and I am duly authorized to swear this affidavit on its behalf.

The statements made in the submission herein shown to me are based on information provided to me and I believe it to be true.

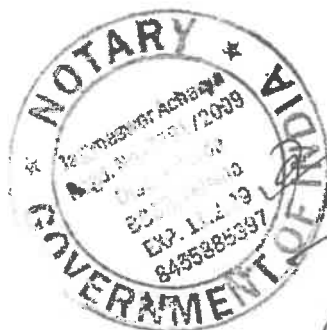
Bhubaneswar.

Dated: 15.01.2025

  
Bharat Kumar Bhadawat

Chief-Regulatory & Enforcement

IDENTIFIED BY ME  
9/5/11  
ADVOCATE, BBSR



15/1/2025  
17

Jagyneshwar Acharya  
Notary, Govt. of India  
Odisha, BBSR, Dist- Khurda  
Regd. No-7701/2009  
2130012257

**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION,  
BIDYUT NIYAMAK BHAWAN.  
PLOT No-4, CHUNOKOLI, SHAILASHREE VIHAR, BHUBANESWAR-751021**

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**IN THE MATTER OF:** M/s OPTCL

*...Petitioner*

**IN THE MATTER OF:** TP Central Odisha Distribution Limited (TPCODL)

*...Respondent*

**Most Respectfully Sheweth,**

1. M/s OPTCL has filed the above petition seeking determination of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 and the Truing up for the Financial Year 2023-24 with following prayers.
  - I. Approval of Aggregate Revenue Requirement of Rs. 1,663.33 Cr.
  - II. Recovery of Transmission Charge @ Rs. 8660 /MW-Day i.e. 36.08 Paise/unit.
  - III. Transmission Loss for FY 2025-26 as 3.05% on energy drawl.
  - IV. Truing up exercise for the FY 2023-24 and consider the deficit amount of Rs.139.71 Cr.
2. That, the Respondent DISCOM herewith submits its response/views to the ARR & True Up application of OPTCL as under:

*B. B. Panda*



(18)

### Submission of TPCODL

3. **Return on Equity:** The petitioner has claimed RoE of Rs. 284.95 Cr. for FY 2025-26 @ 15.5% on 30% of GFA Rs. 6127.93 Cr i.e. RoE has been claimed on equity base of Rs.1838 Cr which is considerably higher than the equity base on which RoE was allowed in True up FY 2022-23 in order dated 13.02.2024. The relevant extract is provided below.

*230. Further, the Government of Odisha specifically in its letter No...3333 dated 24.03.2021 had communicated the Commission that no return on equity shall be paid on the equity of Rs.647.00 Cr. which is relating to the sanction of Government towards conversion of bond to the equity. Excluding the aforesaid amounts from the total equity capital infused by the Govt. of Odisha, the Commission allows the equity capital as at Rs. 995.93 Cr. (i.e., Rs.2157.09 Cr. - Rs.514.16 Cr.- Rs.647.00 Cr.) as on 31.03.2023 and accordingly approves Rs.154.37 Cr. (@15.5% of Rs.995.93 Cr.) towards Return on Equity in this truing-up for the FY 2022-23 as against Rs.141.67 Cr. approved in the Transmission tariff Order of FY 2022-23. (Emphasis Supplied)*

4. The petitioner may kindly justify such huge increase in equity base ( Rs.995.93 as on 31.03.2023 to Rs. 1838 Cr as on 31.03.2025) in last two years and also may confirm the adjustment of Rs. 647 Cr is done in Order dated 13.02.2024 has been incorporated or not.
5. In Table No. 26 the projections of energy transmitted for the Discoms for FY2025-26 is considered as 38097.40 MUs whereas corresponding estimation of all 4 Disocms is 39154 MUs as per the Discoms ARR Petitions for FY 2025-26.
6. Considering the transmission charges for the Discoms and other LTOA consumers petitioner has proposed for Transmission charges @ 36.08 P/U for FY 2025-26. This leads to increase tariff hike of 12.08 P/U, as compared to 24.00 P/U in last FY 2024-25. This increase in transmission charges sought is 50% higher compared to last year shall impact the financial position of Discoms unless the retail supply tariff is increased proportionately. Therefore, Hon'ble Commission is requested to balance out the situation so that interest of all the stakeholders are safeguarded.
7. That, the Applicant has proposed a deficit of Rs. 139.71 Cr. under truing up application for FY 23-24. From the Transmission Tariff Order dated 13.02.2024 it is observed that the Hon'ble Commission has approved the truing up till FY 22-23 wherein the cumulative surplus is Rs 117.60 Cr. Therefore, having cumulative available surplus, Hon'ble Commission may take a prudence check and approve the truing up for FY 23-24.

*Behera*



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8. That, It is humbly submitted that any attempt to transfer historical liabilities of erstwhile Distribution Companies to successor entities directly contravenes Section 21 of the Electricity Act, 2003. The legislative framework clearly prohibits such transfer of historical liabilities, a position that has been consistently upheld by various State Electricity Regulatory Commissions. This principle formed the cornerstone of the distribution sector restructuring process and was explicitly incorporated in the RFP documents that governed the vesting of erstwhile Discoms into new entities.
9. It is therefore prayed that the Hon'ble Commission may kindly take the above into consideration while approving the ARR and True up of the petitioner so as to ensure the letter and spirit of the Electricity Act, 2003, and the established principles of Balance Sheet segregation remains intact. This would ensure regulatory consistency and protect the financial viability of the successor entities as envisaged under the Act

**Prayers**

- a) It is prayed before the Hon'ble Commission to kindly consider the suggestion made by TPCODL while approving the ARR for FY 2025-26 and True up for FY 2023-24 of OPTCL.
- b) The Hon'ble Commission may carry out prudence check of the ARR and True up petition of the petitioner and take appropriate decision in this matter.
- c) The Hon'ble Commission may kindly ensure no pre-vesting period liabilities/claims/expenditures are passed on to the new Discoms in accordance with the letter and spirit of Electricity Act, 2003, Vesting Order and other applicable regulatory frameworks.
- d) The Hon'ble Commission may kindly allow us to make additional submission in this matter.

*B. B. Madhuf*



20

## Sankalp Mohanty

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**From:** Sankalp Mohanty  
**Sent:** 16 January 2025 19:11  
**To:** ODISHA ELECTRICITY REGULATORY COMMISSION Oerc  
**Cc:** rtc@optcl.co.in; Director Operation; CMD; Bharat Kumar Bhadawat; Soumya Ranjan Mishra; Ceo  
**Subject:** Submission of TPCODL on OPTCL's ARR & True Up application in Case No. 93 of 2024  
**Attachments:** TPCODL's Submission on Case No. 93 of 2024 - OPTCL ARR FY26 & True Up FY24.pdf

Respected Sir,

Please find attached submission of TPCODL on OPTCL's ARR application for FY 2025-26 & True Up application for FY 2023-24 in Case No. 93 of 2024.

Regards,

**Sankalp Mohanty** | Regulatory

Web [www.tpcentralodisha.com](http://www.tpcentralodisha.com)

**TPCODL**  
TP CENTRAL ODISHA DISTRIBUTION LIMITED  
A Tata Power and Odisha Government Joint Venture

Connect with us on: 



BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
PLOT NO. 4, CHUNAKOLI, SAILESHREE VIHAR,  
CHANDRASEKHARPUR, BHUBANESWAR-751021

CASE NO. 93/2024  
FILING NO. 3

**IN THE MATTER OF:** (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**And**

(ii) Truing up application for FY 2023-24 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

**AND**

**IN THE MATTER OF:** Odisha Power Transmission Corporation Limited, Janpath,  
Bhubaneswar

..... Applicant

vrs

TP Central Odisha Distribution Limited and 15 others.

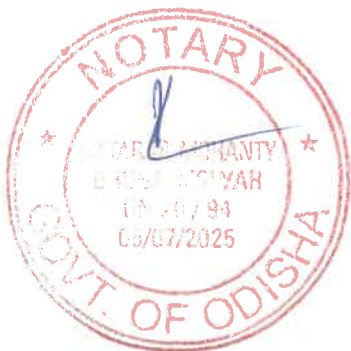
..... Objectors

**Rejoinder to the objections raised by the Objector TP  
Central Odisha Distribution Limited (TPCODL).**

The humble applicant above named

**MOST RESPECTFULLY SHEWETH:**

1. The answering Applicant denies all allegations, averments and submissions contained in the reply filed on behalf of TP Central Odisha Distribution Limited (TPCODL), Objector which are contrary to or inconsistent with the record and / or what is stated hereinafter. Instead of giving a Para-wise Rejoinder, it is submitted as under:



1

*Prabbeer Kumar Mahapatra*

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2. Vide affidavit dated 15.01.2025, TPCODL has raised certain objections on ARR & Transmission Tariff Application of OPTCL for FY 2025-26 and Truing up application for FY 2023-24.
3. M/s. Odisha Power Transmission Corporation Limited, Bhubaneswar (in short OPTCL) undertakes Intra State transmission business in the state of Odisha. It has been notified as the State Transmission Utility (STU) U/s 39(1) of the Electricity, 2003.
4. Being the STU as well as a Transmission licensee, OPTCL is primarily responsible for transmitting electricity from power generation companies to the distribution companies within the State of ODISHA. The transmission infrastructure have been created based on the requirement / recommendation of Distribution Companies considering the following components mainly:-
  - To provide the power supply to upcoming Industrial hub.
  - To strengthen the Inter State Power connectivity for import / export of power.
  - To improve the voltage profile in the low voltage area/pockets.
  - To provide un-interrupted power to the EHT, HT and LT Consumers of the state
  - Availability of alternate power supply and also meet the N-1 Transmission planning criteria
  - To improve the system availability, reliability & quality of power supply.
  - To meet the future load growth.
  - To improve socio economic status of peripheral inhabitants.
  - To reduce Transmission Losses.
5. It may be noted that OPTCL has been consistently maintaining system availability at around 99.98% which is more than the normative system availability of 98.50%.
6. Except NALCO & IMFA, all the open access customers are the consumers of Distribution Companies. Therefore, the consumers of Odisha are the ultimate beneficiaries of all the transmission infrastructure though created by OPTCL.
7. OPTCL has adopted the principles enunciated in the Transmission Tariff Regulations, 2014 for proposing the different components of ARR for FY 2025-26 in the present application. Except return on equity, all the components allowed in the ARR are subject to truing up which are carried out on the basis of actual expenses booked in the Audited books of Accounts of OPTCL. Considering the requirement for expenses on operation and maintenance, debt service obligation and other expenditure as per the provisions stipulated in the Regulations, 2014, the transmission tariff is projected with justifications.



8. In the regulatory process, all the controllable/uncontrollable cost incurred by licensee needs to be recovered through tariff so as to make it cost effective without burdening the future consumers. It is obligatory for the transmission licensee (STU) to conduct its operations within the amount approved by Commission. Also, it caters to the growing demand of the state at optimal cost. Being the transmission licensee, OPTCL endeavors to control its expenditure on different heads to the maximum possible extent. It may be pertinent to mention that projection has been made based on the actual expenditure incurred in 1<sup>st</sup> half of FY 2024-25 along with the likely expenditure to be incurred in FY 2025-26.
9. Due to impact of inflationary effect, the increase in cost is quite inevitable which needs to be considered in the transmission tariff process by Hon'ble Commission. It is pertinent to mention that the STU charges in the state is comparably low with respect to CTU charges and STU charges of other states.
10. Regulation 8.27 of OERC Regulations, 2014 stipulates that the Return on Equity (RoE) shall be computed in rupee terms, on the equity base determined in accordance with regulations 4.8 to 4.22 and regulation 8.17 to 8.24. Further, as per the Regulations 8.28 & 8.29, STU (OPTCL) shall be allowed a Return on Equity Capital in rupee terms at the rate of 15.5% per annum (post tax), on the amount of equity capital base as determined by the Commission. This rate of return needs to be grossed up with the normal/applicable tax rate. Further, the maximum equity allowable for ROE as per the regulation is 30% of the Capital Cost (GFA). Considering the above, OPTCL has projected the ROE of Rs. 284.95 Cr. on equity base of Rs. 1838.38 Cr. (i.e. 30% of the GFA: – Rs. 6127.93 Cr. as on 31.03.2024). However, for FY 2024-25, Hon'ble Commission has allowed ROE on the actual equity capital infused by the Government of Odisha where Equity Capital of Rs. 647 Cr. has not been considered.
11. The Transmission infrastructure are created considering the demand and request of the DISCOMs from time to time, after due approval from the Hon'ble OERC through Transmission Plan. Being a Transmission License, OPTCL has always endeavored to create the Transmission infrastructure for providing reliable and quality power to the consumers of DISCOMs. Accordingly, every year OPTCL is adding more and more transmission assets to meet the requirement of DISCOMs. Therefore, the ARR of OPTCL will be on an increasing trend in comparison to the previous year and OPTCL is entitled to recover its ARR fully from the DISCOMs. It is anticipated that the demand of DISCOMs (in MU) will increase proportionately with respect to addition of Infrastructure in the coming years.



12. OPTCL has proposed to recover ARR amount of Rs. 1398.71 Cr. from LTOA customers including DISCOMs. It is proposed that Rs. 1374.55 Cr. to be recovered from DISCOMs for transmission of 38097.40 MU energy @ 36.08 P / kwh as transmission charge, as detailed below:-

SL No.	DISCOMS	MU Projected	Less:- Drawal in 33 & 11 kV	Net Projected MU	Proposed rate@ p/u	Rs. in Cr.
1	TPCODL	13823.00	32.00	13,791.00	36.08	497.58
2	TPWODL	11274.00	324.00	10,950.00	36.08	395.08
3	TPNODL	8378.40	31.00	8,347.40	36.08	301.17
4	TPSODL	5062.00	53.00	5,009.00	36.08	180.72
	<b>TOTAL</b>	<b>38537.40</b>	<b>440.00</b>	<b>38097.40</b>		<b>1,374.55</b>

The aforesaid MU projections were made by concerned DISCOMs based on OPTCL's request for the purpose of ARR.

13. The ARR projection of Rs.1663.33 Cr. for FY 2025-26 is increased by 2.57% over the projection of FY 2024-25. Transmission Charge is arrived at 36.08 paise per unit by dividing the total ARR of OPTCL with the recent realistic MU projections of DISCOMs and recovered from them on a monthly basis. This rate will decrease if DISCOMs drawal increase. Alternatively, OPTCL is proposing to recover the Transmission charges on a monthly basis, based on the recent realistic MU projections of DISCOMs as detailed in Sl. No. 12 above, **irrespective of the drawal.**
14. Hence, mere apprehension of TPCODL towards imposition of excessive burden on Discoms seems to be inappropriate and unacceptable which is likely to be rejected at this juncture. Moreover, the contention of the stake holder operating in the value chain of electricity needs to appreciate the fact that the cost recovery has to be in full so as to make the sector sustainable.
15. The truing up application for F.Y. 2023-24 has been filed in compliance to the regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014. Accordingly, the deficit of Rs. 139.71 Cr. has been calculated.
16. Anything not specifically admitted or dealt with shall be deemed to have been denied. The answering Applicant craves leave and reserves its rights to make further submissions at the time of hearing. The objections not specifically admitted may be deemed to have been denied.

#### PRAYER

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of TPCODL while approving ARR

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*Prabbeer Kumar Mallick*

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and Transmission Tariff of OPTCL for FY 2025-26 & Truing up application for the FY 2023-24.

Bhubaneswar  
January 31, 2025

By the Applicant  
Through

*Poober Kumar Mathia*

Sr. GM (El.), RT&C



BEFORE THE HON'BLE  
ODISHA ELECTRICITY REGULATORY COMMISSION  
BIDYUT NIYAMAK BHAWAN  
PLOT NO.4, CHUNOKOLI, SHAILASHREE VIHAR, CHANDRASEKHARPUR,  
BHUBANESWAR-751021

Case No. 93 of 2024

In the matter of: (i) An Application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Sections 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

And

(ii) Truing Up Application for FY 2023-24 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.



AND

In the matter of:

OPTCL

.... Applicant/Petitioner

VRS

.... Respondent

SI. No. 32 TPWODL & Others  
Dt. 16/01/2025

AFFIDAVIT

K.P. MISHRA  
Notary  
Reg. No. ON29/24  
Sambalpur  
I Kshirod Chandra Nanda, aged about 55 years, S/o. late Radhanath Nanda working as Sr. GM (RA & Strategy), do hereby solemnly affirm and state as follows:

1. That, I am authorized representative of the TPWODL, the Respondent in the instant case and competent to swear this affidavit for and on behalf of the licensee.
2. That, I have gone through the contentions in this application and understood the contents thereof.
3. That, the facts stated in the reply are true to the best of my knowledge & belief and are as per available records.

*Kshirod Ch Nanda*  
Respondent

Verified that the contents of the above affidavit are true and correct, no part of it is false and nothing material has been concealed therefrom.

Verified at Sambalpur on this 16th day of January 2025  
The deponent solemnly affirms  
today at about 4:15 P.M.

*Kshirod Ch Nanda*  
Respondent

K.P. MISHRA, NOTARY  
Regd. ON-23/24  
SAMBALPUR, ODISHA

BEFORE THE HON'BLE  
ODISHA ELECTRICITY REGULATORY COMMISSION  
BIDYUT NIYAMAK BHAWAN  
PLOT NO.4, CHUNOKOLI, SHAILASHREE VIHAR, CHANDRASEKHARPUR,  
BHUBANESWAR-751021

Case No. 93 of 2024

**In the matter of:** (i) An Application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Sections 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

And

(ii) Truing Up Application for FY 2023-24 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

AND

**In the matter of:**

OPTCL ... Applicant/Petitioner

VRS

TPWODL & Others ... Respondent

**Most Respectfully Sheweth**

1. That, the Respondent, has taken over the distribution business from erstwhile WESCO utility w.e.f 01.01.2021 as per terms of vesting order. TP Western Odisha Distribution Limited (TPWODL) is a joint venture between Tata Power and the Government of Odisha with equity participation of 51% by Tata Power Company Ltd.
2. That, the Respondent is the Distribution Licensee, as per License Condition dated 26.03.2021 of the Hon'ble Commission, in western part of Odisha having 09 revenue districts namely Sambalpur, Jharsuguda, Deogarh, Sundergarh, Bargarh, Bolangir, Sonapur, Kalahandi and Nuapada with area of operation of 48373 Sq.Km.
3. That, as per mandate of Vesting Order, TPWODL is procuring power from GRIDCO, who is the state designated entity to procure power for all the 4 DISCOM(s) from different generators like Thermal, Hydrel, Renewable etc. At present the approved BST is Rs. 3.80/unit with a BSP surcharge of Re. 0.35/unit which is payable quarterly.

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4. That, the Applicant is also a Deemed Transmission Licensee under Section 14 of the Electricity Act, 2003.
5. That, the present application bearing Case No. 93 of 2024 has been filed by the Applicant before Hon'ble Odisha Electricity Regulatory Commission on 29.11.2024 for approval of its Aggregate Revenue Requirement and determination of Transmission Tariff for the Financial Year 2025-26 along with its Truing Up application for FY 2023-24.
6. That, the proposed Transmission tariff is abnormally very high and should not be permitted. This will adversely affect the RST of the DISCOMs and will be huge burden on the consumers of Odisha.
7. That, the revenue requirement projected by the applicant for the FY 2025-26 is about 53% more than that approved for the FY 2024-25. The comparative figures of components of ARR are given in the table below:

ITEMS	OERC Approval		Increase in approved FY 24-25 over approved FY 23-24	Proposal for OPTCL FY 2025-26	Increase in proposed FY 25-26 over approved FY 24-25
	FY 2024-25	FY 2023-24			
<b>A) FIXED COST</b>	<b>Rs. Cr</b>	<b>Rs. Cr</b>	<b>Rs. Cr</b>	<b>Rs. Cr</b>	<b>Rs. Cr</b>
<b>1. O&amp;M Expenses</b>	<b>661.03</b>	<b>624.71</b>	<b>5.49%</b>	<b>821.9</b>	<b>24%</b>
(i) Employees Cost including Terminal Benefits	488.63	449.08	8.09%	554.05	13%
(ii) A&G Cost	37.05	40.28	-8%	49.8	34%
(iii) R&M Cost	135	135	0%	217.7	61%
(iv) Expenses related to auxiliary energy consumption	0	0		0	
(v) Other misc. expenses, statutory levies and taxes (GCC)	0.35	0.35	0%	0.35	0%
<b>2. Interest &amp; Financial Charges</b>	<b>154.11</b>	<b>129.75</b>	<b>19%</b>	<b>175.68</b>	<b>14%</b>
(i) Interest on Loan Capital	133.95	111.83	20%	145.61	9%
(ii) Interest on Working Capital	0	0		0	
(iii) Rebate	20.16	17.92	13%	27.97	39%
(iv) Incentive as per OREP-2022				2.1	
<b>3. Depreciation &amp; amortisation expense</b>	<b>275.67</b>	<b>269.54</b>	<b>2%</b>	<b>356.57</b>	<b>29%</b>
<b>4. Return on Equity</b>	<b>162.14</b>	<b>140.42</b>	<b>15%</b>	<b>284.95</b>	<b>76%</b>
<b>5. Income Tax</b>	<b>7</b>	<b>27.21</b>	<b>-74%</b>	<b>10.77</b>	<b>54%</b>
<b>Sub-Total (A)</b>	<b>1,259.95</b>	<b>1,191.63</b>	<b>6%</b>	<b>1,649.87</b>	<b>31%</b>
<b>B) Others</b>					
Incentive for system availability	5	5	0%	13.46	169%

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ITEMS	OERC Approval		Increase in approved FY 24-25 over approved FY 23-24	Proposal for OPTCL	Increase in proposed FY 25-26 over approved FY 24-25
	FY 2024-25	FY 2023-24		FY 2025-26	
<b>Total Trans. Cost (A+B)</b>	<b>1,264.95</b>	<b>1,196.63</b>	<b>6%</b>	<b>1,663.33</b>	<b>31%</b>
C) Less Misc. Receipts	302.75	300.45	1%	264.62	-13%
D) Less: Regulatory Surplus	48.5				-100%
E) ARR to be recovered from LTOA Customers i.e. OPTCL's Aggregate Revenue Requirement	913.70	896.18	2%	1,398.71	53%

8. That, the Truing Up proposed by the Applicant for FY 2023-24 is showing Rs. 139.71 Cr. surplus.

Particulars	OERC Approval	Actual as per Audited Accounts	Truing Up	Surplus/ (Deficit)
A. Employee Cost (Net)	449.08	493.67	493.67	-44.59
B. R&M Cost	135	130.83	130.83	4.17
C. A&G Cost (Including SLDC & GCC)	40.28	46.83	42.81	-2.53
<b>Sub-Total (A+B+C)</b>	<b>624.36</b>	<b>671.33</b>	<b>667.31</b>	<b>-42.95</b>
D. Depreciation	269.54	294.71	294.71	-25.17
E. Interest on Long-term liability	111.83	120.96	120.96	-9.13
F. Rebate	17.92	16.23	16.23	1.69
G. Incentive for system availability	5		13.46	-8.46
H. GCC Expenses	0.35			0.35
<b>Sub-Total (A to H)</b>	<b>1029</b>	<b>1103.23</b>	<b>1112.67</b>	<b>-83.67</b>
I. Return on Equity	140.42		172.21	-31.79
J. Income Tax	27.21		10.77	16.44
<b>Grand Total (A to J)</b>	<b>1196.63</b>	<b>1103.23</b>	<b>1295.65</b>	<b>-99.02</b>
Less: Inter-state wheeling & Misc. Revenue	300.45	412.67	282.59	17.86
<b>Net Transmission Cost</b>	<b>896.18</b>	<b>690.56</b>	<b>1013.06</b>	<b>-116.88</b>
Revenue from Transmission Charges	896.18	873.35	873.35	22.83
<b>Difference to be allowed in truing up (FY 2023-24)</b>	<b>0</b>	<b>182.79</b>	<b>-139.71</b>	<b>-139.71</b>

Approved On 11/11/24

**TPWODL Views/Suggestions:**

9. That, the Applicant has proposed 13% higher as compared to previous year ARR approved by Hon'ble Commission under **Employee Expenses**. The actual expenses for FY 23-24 as per Truing Up application is Rs. 493.67 Cr. and for the current FY 2024-25 the Applicant has estimated Rs. 529.25 Cr. and Rs. 554.05 Cr for ensuing year. The Hon'ble Commission is requested to approve the employee expenses based on actuals till December-2024.
10. That, the Applicant has proposed 34% higher as compared to previous year ARR approved by the Hon'ble Commission under **A&G Expenses**. It may be noted that in truing up, the actual

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expenses for FY 23-24 has come to Rs. 46.83 Cr. against OERC approval of Rs. 40.28 Cr. The expenses proposed are majorly towards property related expenses, communication, professional charges, conveyance & travelling, SLDC charges, licensee fee and material related expenses. Hon'ble Commission has been approving A&G expenses as per escalation factor equal to WPI over the amount approved in the previous year. However, the Applicant has requested to consider at least 7% escalation in line with DISCOMs Tariff Regulation, 2022. Therefore, Hon'ble Commission may take a suitable decision in this regard after prudence check.

11. That, the Applicant has proposed 61% higher as compared to previous year ARR approved by the Hon'ble Commission under **R&M Expenses**. It may be noted that in truing up, the actual expenses for FY 23-24 has come to Rs. 130.83 Cr. against OERC approval of Rs. 135 Cr. Further, the actual expenses till Sep-24 is Rs. 76.95 Cr and current year estimation is Rs 151.62 Cr against which ensuing year proposed amount is Rs. 217.70 Cr. For this, the applicant has provided a list of items which needs to be replaced, repaired and maintained. Therefore, Hon'ble Commission is requested to approve the R&M expenses based on actuals derived till December-2024.

12. That, the Applicant has proposed 76% higher as compared to previous year ARR approved by the Hon'ble Commission under **Return on Equity**. As per Transmission Tariff Regulation, the Applicant shall be allowed ROE @15.5% per annum on the amount of Equity Capital base as approved by the Hon'ble Commission. It would be pertinent to mention that, the Hon'ble Commission in Tariff Order dated 13.02.2024 in Case No. 113 of 2023 has determined Equity Capital as Rs. 1046.07 Cr. as per the following table:

Reviewed On Note

Particulars	Rs. Cr
Equity capital infused by State Govt. up to FY 22-23	2206.10
Equity capital still under CWIP	513.03
Equity capital on which no ROE shall be paid as per GoO Letter No. 3333 dated 24.03.2021	647
<b>Total Equity base</b>	<b>1046.07</b>

13. That, the Applicant at Table 22 of its filing has provided the book value of own assets as on 31.03.2023, 31.03.2024, 31.03.2025 and 31.03.2026 as under:

Particulars	Rs. Cr
Book value of own assets as on 31.03.2023	5309.15
Addition in FY 23-24	292.52
Book value of own assets as on 31.03.2024	5601.67
Addition in FY 24-25	526.26
Book value of own assets as on 31.03.2025	6127.93
Addition in FY 25-26	1605.73
<b>Book value of own assets as on 31.03.2026</b>	<b>7733.67</b>

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As can be seen from the above table, the asset addition during the previous year is only Rs. 292.52 Cr. and current year estimation is Rs. 526.26 Cr. The actual capitalization till September-2024 is unavailable. Assuming the estimated amount will be capitalized during the current year, the optimistic target of capitalization to the tune of Rs. 1605.73 Cr. appears to be in higher side. Therefore, Hon'ble Commission is requested to consider the above through prudence check. Even the estimated capitalization for the current year is fully materialized, the base for ROE calculation will be Rs. 1444.81 Cr. Accordingly, the ROE for FY 25-26 will be Rs. 224 Cr.

Particulars	Probable (Rs. Cr.)
Total Equity base as on 31.03.2024 (as Approved in FY 24-25 ARR)	1046.07
Asset Addition during FY 24-25 – Rs. 526.26 Cr. x 0.30	157.88
Asset Addition in FY 25-26 – Avg. of Rs. 1605.73 Cr. x 0.30	240.86
Total Equity base for ROE Calculation FY 25-26	1444.81
ROE (%)	15.5%
<b>Return on Equity</b>	<b>223.95</b>

Alternately, considering Hon'ble Commission's methodology as per previous Tariff Orders, the revised equity base is Rs. 1053.90 Cr. as has been derived in the following table:

Particulars	Rs. Cr
Equity capital infused by State Govt. up to FY 23-24 as proposed in ARR Application	2746.52
Equity capital still under CWIP as per OPTCL submission considering Govt. funded assets	1045.62
Equity capital on which no ROE shall be paid as per GoO Letter No. 3333 dated 24.03.2021	647
<b>Total Equity base</b>	<b>1053.90</b>
ROE (%)	15.5%
<b>Return on Equity</b>	<b>163.35</b>

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That, in terms of the above, the Hon'ble Commission is requested to compute the RoE based on the approved equity base and allow the same to the Applicant after due prudence check.

14. That, the Applicant has proposed 54% higher as compared to previous year ARR approved by the Hon'ble Commission under **Income Tax**. The Hon'ble Commission may take a suitable decision while approving the Income Tax expenses subject to actual payment which will be verified during truing up exercise of that year.
15. That, the Applicant has proposed a deficit of Rs. 139.71 Cr. under truing up application for FY 23-24. From the Transmission Tariff Order dated 13.02.2024 it is observed that the Hon'ble Commission has approved the truing up till FY 22-23 wherein the cumulative surplus is Rs 117.60 Cr. Therefore, having cumulative available surplus, Hon'ble Commission may take a prudence check and approve the truing up for FY 23-24.

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16. That, the applicant has proposed a tariff hike of 12.08 paisa per unit which is as high as 50% of the existing transmission charges. Therefore, any increase in transmission charges will invite Retail Supply Tariff increase through DISCOM for which Hon'ble Commission may take a suitable decision.

17. That, the Respondent craves leave for submission of further/additional submission as and when required.

*Kshirod Ch. Nanda.*  
Respondent

Place: *Sambalpur*

Date: *16.01.2025*

PART OF AFFIDAVIT  
*for 16/01/2025*  
NOTARY  
Regd. No. ON 23/94  
SAMBALPUR: ORISSA

**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
PLOT NO. 4, CHUNAKOLI, SAILESHREE VIHAR,  
CHANDRASEKHARPUR, BHUBANESWAR-751021**

**CASE NO. 93/2024  
FILING NO. 3**

**IN THE MATTER OF:** (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**And**

(ii) Truing up application for the FY 2023-24 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

**AND**

**IN THE MATTER OF:** Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

..... Applicant

**vrs**

TP Western Odisha Distribution Limited and 15 others.

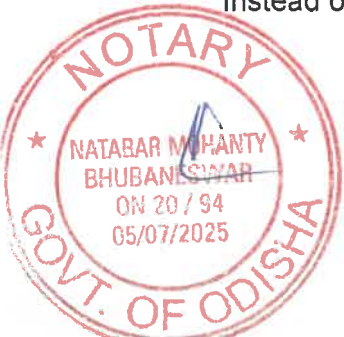
..... Objectors

**Rejoinder to the objections raised by the Objector TP  
Western Odisha Distribution Limited (TPWODL).**

**The humble applicant above named**

**MOST RESPECTFULLY SHEWETH:**

1. The answering Applicant denies all allegations, averments and submissions contained in the reply filed on behalf of TP Western Odisha Distribution Limited (TPWODL), Objector which are contrary to or inconsistent with the record and / or what is stated hereinafter. Instead of giving a Para-wise Rejoinder, it is submitted as under:



1  
(34)

*Prabbeer Kumar Mallik*

2. Vide affidavit dated 16.01.2025, TPWODL has raised certain objections on ARR & Transmission Tariff Application of OPTCL for FY 2025-26 and Truing up application for FY 2023-24.
3. M/s. Odisha Power Transmission Corporation Limited, Bhubaneswar (in short OPTCL) undertakes Intra State transmission business in the state of Odisha. It has been notified as the State Transmission Utility (STU) U/s 39(1) of the Electricity, 2003.
4. Being the STU as well as a Transmission licensee, OPTCL is primarily responsible for transmitting electricity from power generation companies to the distribution companies within the State. The transmission infrastructures have been created based on the requirement / recommendation of Distribution Companies considering following components mainly:-
  - To provide the power supply to upcoming Industrial hub.
  - To strengthen the Inter State Power connectivity for import / export of power.
  - To improve the voltage profile in the low voltage area/pockets.
  - To provide un-interrupted power to the EHT, HT and LT Consumers of the state
  - Availability of alternate power supply and also meet the N-1 Transmission planning criteria
  - To improve the system availability, reliability & quality of the power supply.
  - To meet the future load growth.
  - To improve socio economic status of peripheral inhabitants.
  - To reduce Transmission Losses.
5. It may be noted that OPTCL has been consistently maintaining system availability at around 99.98% which is more than the normative system availability of 98.50%.
6. Except NALCO & IMFA, all the open access customers are the consumers of Distribution Companies. Therefore, the consumers of Odisha are the ultimate beneficiaries of all the transmission infrastructure created by OPTCL.
7. OPTCL has adopted the principles enunciated in the Transmission Tariff Regulations, 2014 for proposing the different components of ARR for FY 2025-26 in the present application. Except return on equity, all the components allowed in the ARR are subject to truing up, which are carried out on the basis of actual expenses booked in the Audited books of Accounts of OPTCL. Considering the requirement for expenses on operation and maintenance, debt service obligation and other expenditure as per the provision stipulated in the Regulations, 2014, the transmission tariff is projected with justifications.



8. In the regulatory process all the controllable/uncontrollable cost incurred by licensee needs to be recovered through tariff so as to make it cost effective without burdening the future consumers. It is obligatory for the transmission licensee (STU) to conduct its operation within the amount approved by Commission. Also, it caters to the growing demand of the state at optimal cost. Being the transmission licensee, OPTCL endeavors to control its expenditure on different heads to the maximum possible extent. It may be pertinent to mention that projection has been made based on the actual expenditure incurred in 1<sup>st</sup> half of FY 2024-25 along with the likely expenditure to be incurred in FY 2025-26.
9. Due to impact of inflationary effect, the increase in cost is quite inevitable which needs to be considered in the transmission tariff process by Hon'ble Commission. It is pertinent to mention that the STU charges in the state is comparably low with respect to CTU charges and STU charges of other states.
10. Para 1 to 8 are the matters of record.
11. **Para 9:** The projection of Employee Cost amounting to Rs. 554.05 Cr. is calculated in line with the Regulation 8.6 to 8.11 of OERC Regulations, 2014 with detailed justification. Therefore, Hon'ble Commission is hereby requested to consider the proposal of OPTCL and allow Rs. 554.05 Cr. towards Employee Cost including Terminal Benefits.
12. **Para 10:** It is submitted that the nature of A&G expenses of the power utilities are almost same. However, it is observed for FY 2024-25, Hon'ble Commission had considered the escalation factor of all the utilities differently. The escalation factor for OPTCL is 0.73%, GRIDCO is 5.00%, DISCOMs is 7.00% and OHPC is 5.47%. Ideally, escalation factor of all the utilities should have been in parity. As per the Regulations, the A&G cost should be increased by WPI on the base year, provided the number of establishments have remained the same. But the number of establishments/offices of OPTCL has increased over a period of time commensurating with the increase in asset by addition of grid Sub-stations, ckt. kilometers of lines and MVA capacity for better supervision in construction, operation and maintenance and for maintaining quality of supply. Hence, A&G expenses should be increased proportionately. Further, it is submitted that the some of the A&G Expenses are related to CPI also and it is evident that every year the actual expenses have crossed the approved amount despite it being a controllable expenditure. Therefore, Hon'ble Commission is hereby requested to consider the proposal of OPTCL and allow Rs. 49.80 Cr. towards Administrative and General Expenses (A&G).
13. **Para 11:** In the last year Tariff Order, Hon'ble Commission has observed that the health of transmission assets is vital for smooth and reliable operation of transmission system



assets. The Commission therefore desires that, OPTCL should incur R&M expenses exclusively for condition-based maintenance of transmission assets for improving reliability and availability of equipment & material associated with the transmission system for smooth and trouble-free operation of the system. As on date, about 61 Nos. of Grid Substation and 100 Nos of lines have completed 25 years and 35 years respectively. Accordingly, OPTCL projected Rs. 217.70 Cr. towards Repair & maintenance which is well within the regulatory limit of Rs. 238.85 Cr. (i.e. 2.50% of GFA as on 31.03.2024). Hon'ble Commission is hereby requested to consider the proposal OPTCL and allow Rs.217.70 Cr. towards Repair & Maintenance Expenses (R&M).

**14. Para 12 &13:** Regulation 8.27 of OERC Regulations, 2014 stipulate that the Return on Equity (RoE) shall be computed in rupee terms, on the equity base determined in according with regulations 4.8 to 4.22 and regulation 8.17 to 8.24. Further, as per the Regulations 8.28 & 8.29 STU (OPTCL) shall be allowed a Return on Equity Capital in rupee terms at the rate of 15.5% per annum (post tax), on the amount of equity capital base as determined by the Commission. This rate of return needs to be grossed up with the normal/applicable tax rate. Further, the maximum equity allowable for ROE as per the regulation is 30% of the Capital Cost (GFA). Considering the above, OPTCL has projected the ROE of Rs. 284.95 Cr. on equity based of Rs. 1838.38 Cr. (i.e. 30% of the GFA: – Rs. 6127.93 Cr. as on 31.03.2024). Hon'ble Commission is hereby requested to consider the proposal of OPTCL and allow Rs.284.95 Cr. towards Return on Equity (RoE).

**15. Para 14:** Regulation 8.44 of OERC Regulations, 2014 stipulates that “the **actual assessment** of income tax should take into account benefits of tax holidays and the credit for carry forward losses applicable as per the provisions of the Income Tax, Act 1961 shall be passed on to the consumers”. In this regard, it is submitted that the actual assessment for FY 2025-26 shall be made only after end of FY 2025-26. Therefore, OPTCL has projected Income Tax of Rs.10.77 Cr. based on assessment order for FY 2023-24.

**16.** The Transmission infrastructures are created considering the demand and request of the DISCOMs from time to time, after due approval form the Hon'ble OERC through Transmission Plan. Being a Transmission License, OPTCL has always endeavored to create the Transmission infrastructure for providing reliable and quality power to the consumers of DISCOMs. Accordingly, every year OPTCL is adding more transmission assets to meet the requirement of DISCOMs. Therefore, the ARR of OPTCL will be on an increasing trend in comparison to the previous year and OPTCL is entitled to recover





its ARR fully from the DISCOMs. It is anticipated that the demand of DISCOMs (in MU) will increase proportionately with respect to addition of Infrastructure in the coming years.

17. OPTCL has proposed to recover ARR amount of Rs. 1398.71 Cr. from LTOA customers including DISCOMs. It is proposed that Rs. 1374.55 Cr. to be recovered from DISCOMs for transmission of 38097.40 MU energy @ 36.08 P / kwh as transmission charges, as detailed below:-

SL. No.	DISCOMS	MU Projected	Less:- Drawal in 33 & 11 kV	Net Projected MU	Proposed rate@ p/u	Rs in Cr.
1	TPCODL	13823.00	32.00	13,791.00	36.08	497.58
2	TPWODL	11274.00	324.00	10,950.00	36.08	395.08
3	TPNODL	8378.40	31.00	8,347.40	36.08	301.17
4	TPSODL	5062.00	53.00	5,009.00	36.08	180.72
	<b>TOTAL</b>	<b>38537.40</b>	<b>440.00</b>	<b>38097.40</b>		<b>1,374.55</b>

The above MU projections were made by concerned DISCOMs based on OPTCL's request for the purpose of ARR.

18. The ARR projection of Rs.1663.33 Cr. for FY 2025-26 is increased by 2.57% over the projection of FY 2024-25. Transmission charge is arrived at 36.08 paise per unit by dividing the total ARR of OPTCL with the recent realistic MU projections of DISCOMs and recovered from them on a monthly basis This rate will decrease if DISCOMs drawal increase. Alternatively, OPTCL is proposing to recover the Transmission charges on a monthly basis, based on the recent realistic MU projections of DISCOMs as detailed in Sl. No. 12 above, **irrespective of the drawal.**
19. Hence, mere apprehension of TPWODL towards imposition of excessive burden on Discoms seems to be inappropriate and unacceptable which is likely to be rejected at this juncture. Moreover, the contention of the stake holder operating in the value chain of electricity needs to appreciate the fact that the cost recovery has to be in full so as to make the sector sustainable.
20. The truing of application for the F.Y. 2023-24 has been filed in compliance to the regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014. Accordingly, the deficit of Rs. 139.71 Cr. has been calculated.
21. Anything not specifically admitted or dealt with shall be deemed to have been denied. The answering Applicant craves leave and reserves its rights to make further submissions at the time of hearing. The objections not specifically admitted may be deemed to have been denied.



PRAYER

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of TPWODL while approving ARR and Transmission Tariff of OPTCL for FY 2025-26 & Truing up application for the FY 2023-24.

Bhubaneswar  
January 31, 2025

By the Applicant  
Through

*Roabeer Kumar Nathu*

Sr. GM (EI.), RT&C



**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION**

**Plot No.4, Chunokoli, Shailashree Vihar, Bhubaneswar, Odisha**

**Case No: 93/ 2024**

**IN THE MATTER OF:**

Application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64(2) and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC Regulation 53 (7) of the OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**AND IN THE MATTER OF:**

**OPTCL, Janpath, Bhubaneswar**

**Odisha, 751022**

**..... Applicant**

**Vedanta Ltd.**

**1<sup>st</sup> Floor, Module-C/2,**

**Fortune Tower, Chandrasekharpur,**

**Bhubaneswar, Odisha-751023**

**..... Objector**

**Comments/Inputs on Approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 to be applicable from 1st April 2025.**

In reference to the above cited subject & petition no 93/2024 for approval of ARR and Transmission charges, we submit our comments as under:

1. The Objector, Vedanta Limited (“Vedanta”) owns and operates the following plants:

a) 2400 MW (4 x 600 MW) thermal power plant at Jharsuguda, Odisha (“Vedanta-TPP”).

b) 1215 MW (9 x 135 MW) captive power plant in Jharsuguda, Odisha (“Vedanta-CPP”).

## SUBMISSIONS OF THE OBJECTOR:

The Objector hereby makes the following submissions which may be taken into consideration by the Hon'ble Commission for the purpose of present proceedings.

Before delving into the merits of the petition Vedanta limited would like to make the following request before Hon'ble Commission.

1. It would be imperative to submit that all CGPs and Open Access consumers situated in the State of Odisha must mandatorily procure renewable power in order to fulfil their RPO in terms of Regulation 3.1(b) of the OERC RPO Regulations, 2021, which inter alia provides as under:

*"3. Scope of Regulations and Extent of their Application*

*3.1 These Regulations shall apply to all "Obligated Entities" in the State of Odisha. The Obligated Entities include:*

*(a) Distribution licensee (or any other entity procuring power on their behalf).*

*(b) Any person who owns Captive Generating Plant including co-generation plants based on conventional fossil fuel with installed capacity of 1 MW & above, and consumes electricity generated from such Plant for his own use shall be subject to RPO to the extent of a percentage of his consumption met through such fossil fuel-based captive source.*

*(c) Any person who consumes electricity procured from conventional fossil fuel-based generation through Open Access and third-party sale shall be subject to RPO to the extent of a percentage of his consumption met through such fossil fuel-based source;*

*Provided that the State Commission may, by order, modify/ revise the minimum capacity referred above from time to time."*

That, under Regulation 4.2 of the said Regulations further stipulates mandated quantum of electricity which is to be procured from renewable sources by CGPs and Open Access consumer against the consumption of thermal power procured under Open Access in the State of Odisha along with other Obligated Entities, which is a percentage of the total consumption by

such entity in kWh. The table providing such minimum quantum is reproduced hereinbelow:

Year	Solar RPO	Non-Solar RPO			Total RPO
		HPO	Other Non-Solar RPO	Total Non-Solar RPO	
2021-22	7.25%	0.18%	5.82%	6.00%	13.25%
2022-23	8.00%	0.35%	6.15%	6.50%	14.50%
2023-24	8.75%	0.66%	6.59%	7.25%	16.00%
2024-25	9.75%	1.08%	7.17%	8.25%	18.00%

It is evident from the above table that for the current financial year, CGPs and Open Access Consumers are obligated to fulfil its RPO to the tune of 18.00%, which comprises of solar power (9.75%) and total non-solar RPO (8.25%) against the consumption of thermal power availed under Open Access regime by the obligated entity. The said quantum revised to the tune of 29.91% in draft OERC (Procurement of Energy from Renewable Sources and its Compliance) Regulations, 2024.

Year	Minimum quantum of electricity to be procured from Renewable Energy Sources by Obligated Entity as percentage of total Consumption of Electricity in KWh				
	Wind Renewable Energy	Hydro Renewable Energy	Distributed Renewable Energy	Other Renewable Energy	Total Renewable Energy
	(a)	(b)	(c)	(d)	(e)
2024-25	0.67%	0.38%	1.50%	27.35%	29.91%
2025-26	1.45%	1.22%	2.10%	28.24%	33.01%
2026-27	1.97%	1.34%	2.70%	29.94%	35.95%
2027-28	2.45%	1.42%	3.30%	31.64%	38.81%
2028-29	2.95%	1.42%	3.90%	33.10%	41.36%
2029-30	3.48%	1.33%	4.50%	34.02%	43.33%

- It is submitted that Govt of India has set an ambitious target to install 500 GW of Renewable Power by FY 2030. National Tariff Policy 2016 under clause 6.4

“Renewable sources of energy generation including Co-generation from renewable energy sources:” provides various guidelines to promote procurement of Renewable energy.

3. As the demand of green Aluminium, green steel is continuously rising globally, and the introduction of **Carbon Border Adjust Mechanism** by European Union’s wherein the European Nations places an emission tariff on imports. The CBAM will **initially apply to imports of certain goods and selected precursors** whose production is carbon intensive and at most significant risk of carbon leakage like **cement, iron and steel, aluminium, fertilisers, electricity and hydrogen. In its 1<sup>st</sup> phase exporters has to share its carbon emission data with the products exported in EU nations.** It is imperative for core manufacturing industries producing Aluminium, Cement, Steel, Fertilizers to switch in RE power in gradual manner to be globally competitive. As per the latest study by Centre for energy, Environment and Water the CABM tax would impact 43% of India’s export to the EU nations, India’s second largest oversea market due to raising of cost and eroding competitiveness.
4. It is pertinent to mention here that State of Odisha is a manufacturing hub of India due to its vast reserves of mineral and industrial friendly policy made by Govt of Odisha. The state is the largest producer of iron and steel, stainless steel, primary Aluminium and thermal power in the country. These sectors are power intensive sector which need to be transitioned from thermal to green power in an economic viable manner to be globally competitive.

However, imposition of 100% of transmission charges on availing green power from outside of the state by the industries is making the cost of power highly uneconomic.

5. As the state have limited potential for solar and wind power which are commercial proven RE sources, it becomes vital for the industries to buy RE power from other states to comply RPO and use of green power to make greener product. In line with Odisha Renewable Energy Policy, dated 30.11.2022 Hon’ble Commission has already provided exemption on Intra State transmission charges, waiver on electricity duty, 50% waiver on CSS on the renewable power

generated within the state. This is a welcome step which helps to promote the renewable energy power mix within the state. However, we would like to bring your kind attention on the point the increasing contribution of clean energy ultimately helps in decarbonize the existing level of use of thermal sources within the state thus, increasing consumption of green power by industries is also very critical thereby providing certain waivers/exemption in CSS would ultimately motivate industries to increase RE power consumption.

6. In view of the above submissions, we humbly prayed before Hon'ble Commission that the waiver/exemption on STU charges allowed in Odisha RE Policy 2022 for RE projects commissioned with in the state should be extended for procurement of green power from outside the State also.

7. **Transmission Losses:** OPTCL has proposed transmission loss at 3.05%. In conformity with the power sector reform, OPTCL needs to reduce the transmission loss significantly.

OPTCL should provide the details of the identified areas where loss is maximum in ARR petition. OPTCL has proposed transmission loss without giving the breakup of the losses in different components of transmission system i.e., lines, substations, power transformers and autotransformers etc. OPTCL should have to submit the energy audit report and their standard performance should be monitored by third party auditor as appointed by the Commission.

8. **Determination of Transmission Charges:** It is submitted that OPTCL has proposed transmission charges @ 36.08 P/U for FY 2025-26 against 24 P/Unit as approved by the Commission during FY 2024-25. The proposed Transmission Tariff of 36.08 P/U is very high. It is therefore humbly prayed before Hon'ble Commission to consider these expenses <sup>ed on</sup> basis the actual expenditure and actual equity infusion.

9. **Reactive Energy Charges:** OPTCL has proposed to introduce Reactive Energy Charges of 3 Paise/KVARh. There is no such provision in the Transmission Tariff Regulation and against the spirit of Electricity Act 2003 and hence the proposal of OPTCL is required to be straight away rejected.

It is submitted that Commission provisionally approves reactive energy charges @ 3 paise/kVARh for the FY 2024-25 vide its order dated 13.02.2024 in Case No. 113 of 2023. However, despite approval of such charges for last four years subject to justification to be submitted by OPTCL, OPTCL has not yet submitted the required justification of reactive energy charges in consultation with the stakeholders. Therefore, OPTCL is requested to clarify whether the final justification regarding the reactive energy charges as proposed is submitted as per the Hon'ble Commission's order dated 05.02.2019 in case no. 50/2017. If the same has not yet been submitted by OPTCL then it is humbly prayed before commission to not allow the proposed reactive energy charges for FY 2025-26 and to direct OPTCL to refund the reactive energy charges collected from last 4 years.

**10. Levy of Grid Support Charges (GSC):** OPTCL has filed an application (case No 44 of 2024) on 26.06.2024 for determination and approval for levy of Grid Support Charges for industries having Captive Generating / Cogeneration plants and running in parallel with the Grids of OPTCL. Hon'ble Commission in its order directed the OPTCL to submit a consolidated report within three months' time on or before 15.10.2024 considering the observations/ suggestions of the Director (Regulatory Affairs), OERC along with addressing observations/queries raised by the stakeholders in the earlier Cases filed by M/s. OPTCL regarding GSC.

The justification along with the consolidated report is not yet submitted by OPTCL before the Hon'ble Commission. Therefore, it is humbly prayed before Hon'ble Commission to direct OPTCL to share the report with affected parties if the same has already been submitted to OERC by OPTCL. It is humbly prayed to Hon'ble Commission to conduct public hearing of the application/petition including affected parties as respondent to the application/petition.

Place: Bhubaneswar

Date: 13.01.2025

(45)







BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION,  
BHUBANESWAR

CASE NO. 93 of 2024

**IN THE MATTER OF:**

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64(2) and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**AND IN THE MATTER OF:**

**Odisha Power Transmission Corporation Ltd. (OPTCL)**  
Janpath, Bhubaneswar Odisha – 751022

...Applicant

**Vedanta Limited**

1<sup>st</sup> Floor, Module C/2, Fortune Towers,  
Chandrasekharapur, Bhubaneswar, Odisha-751023  
E Mail Id.: ninad.nigam@vedanta.co.in  
Contact No: 9993000757

...Objector

**AFFIDAVIT**

I, Sri Ninad Nigam, S/o Shri P K Nigam aged about 42 years, resident of Bhubaneswar, do solemnly affirm and state as follows: -

1. That I am working as the Associate General Manager- Power Regulatory Affairs in Vedanta Limited, the objector in the matter and am fully authorised by the said Company to make this affidavit on its behalf.



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2. I have read the accompanying reply/comments, and I say that its contents are true to my knowledge and belief and based on records which are believed to be true and correct.
3. The annexures, if any, filed along with the reply/comments are true copies of their respective original.

Place: Bhubaneswar

Date: 13.01.2025

*Nimolish*

Deponent



**VERIFICATION**

I, the objector above named do hereby verify that the contents of the above affidavit are true and correct to the best of my knowledge, no part of it is false and nothing material has been concealed therefrom.

Verified at Bhubaneswar on this 13<sup>th</sup> day of January 2025.

**GANGARAM BEHERA**  
**BBSR, NOTARY**  
 PH: 9951128391

Place: Bhubaneswar

Date: 13.01.2025

*Nimolish*

Deponent



The Above Named Deponent Being  
 Duly Identified by Sri. *[Signature]*  
 Advocate, Bhubaneswar, Appears  
 Before me on Dt. *13/1/25* At *AMPM*  
 Contents of this Affidavit are  
 True to the Best of his/hor/This  
 Knowledge and Belief

Identified by me

Advocate, BBSR



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**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
PLOT NO. 4, CHUNAKOLI, SAILESHREE VIHAR,  
CHANDRASEKHARPUR, BHUBANESWAR-751021**

**CASE NO. 93/2024  
FILING NO. 3**

**IN THE MATTER OF:** (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**And**

(ii) Truing up application for the FY 2023-24 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

**AND**

**IN THE MATTER OF:** Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

**..... Applicant**

**vrs**

M/s. Vedanta Limited, 1st Floor, Module- C/2, Fortune Towers, Chandrasekharpur, Bhubaneswar, Odisha-751023 & 15 Others.

**..... Objectors**

**Rejoinder to the objections raised by the Objector M/s. Vedanta Limited**

**The humble applicant above named**

**MOST RESPECTFULLY SHEWETH:**

1. That the Objector M/s. Vedanta Limited vide affidavit dated 13.01.2025 has made certain submissions on ARR & Transmission Tariff Application of OPTCL for FY 2025-26 and Truing up application for the FY 2023-24. In reply, OPTCL submits its rejoinder to the submissions in the following paragraphs.



*Poojbeer Kumar Mallick*

**Rejoinder to Para 1 to 6:**

**Waiver/exemption on STU charges for inter-state RE power procurement**

In compliance to para 1 to 6, OPTCL submits the following:

- Industries are already benefiting from the waiver of transmission charges for the procurement of renewable energy (RE) power through the CTU network, which places a financial burden on all Designated Interstate Customers (DICs), including GRIDCO in the state of Odisha.
- The Hon'ble Odisha Electricity Regulatory Commission (OERC), in its letter No. OERC/DIR(T)-332/08/480 dated 01/05/2024, has already facilitated the procurement of RE power from outside the state by applying transmission charges on scheduled basis, rather than on contracted capacity. This initiative has benefitted industrial consumers procuring RE power. A copy of the aforesaid letter is attached as **Annexure-01**.
- It is important to note that OPTCL is undertaking the construction of transmission projects with significant associated costs. Further waivers on transmission charges for industrial consumers could place an additional burden on retail consumers. Therefore, the request from Vedanta should not be approved by the Hon'ble Commission.

**Rejoinder to Para 7:**

**Transmission Loss**

The actual transmission loss for the period **Apr' - Sep' 2024** is calculated to be **3.09%** as shown in the ARR & TT application for FY 2025-26 (page-229). This figure is **less than the actual** transmission loss during last year i.e. **3.11%** for **FY 2023-24**. In fact, OPTCL had projected Transmission loss of 3.05% for FY 2024-25, but Hon'ble Commission had set a target of 3.00% which could not be achieved yet.

In OPTCL system, the transmission loss is purely technical loss and a function of real time injection of power by a number of generators, system configuration and power flow requirements at different load centers. It depends on many parameters / factors such as distance and mismatch between generation and load centers, types of load, reactive power compensation, voltage profile, seasonal variation of demand load etc. Thus, OPTCL does not have much control over the same at any point of time. The transmission system of OPTCL operates as an integral part of the Eastern Region Grid to serve the internal demand of the State as well as to carry out import and export of power depending upon the system demand.



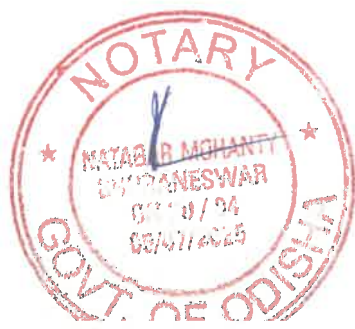
As of the matter of fact, some grid s/s and lines are being constructed in many remote and deprived areas funded under Central & State Govt. schemes in the interest of public. Additional length in EHT lines and Sub-stations in under-loaded areas are also responsible for increase in transmission loss.

The Transmission Loss in OPTCL network is in a gradually reducing trend over the years i.e. from 3.73% during 2014-15 to 3.11% in 2023-24 and has remained 3.09% within 1<sup>st</sup> six months of FY 2024-25 mainly due to addition of infrastructure and various system strengthening works taken up by OPTCL. The actual losses incurred over the years by OPTCL have been within the margin allowed by Hon'ble Commission up to the year FY 2017-18. However in FY 2018-19, the commission set the loss at 3.00% though the projected transmission loss was at 3.25% and thereafter the commission has been pegging the transmission loss at the same level though loss projected by OPTCL remained in a downward trend.

Year	Tr. Loss proposed	OERC Approval	Actual
2014-15	3.75%	3.75%	3.73%
2015-16	3.75%	3.75%	3.67%
2016-17	3.70%	3.70%	3.58%
2017-18	3.50%	3.50%	3.34%
2018-19	3.25%	3.00%	3.28%
2019-20	3.25%	3.00%	3.25%
2020-21	3.20 %	3.00%	3.22%
2021-22	3.15%	3.00%	3.18%
2022-23	3.10%	3.00%	3.15%
2023-24	3.10%	3.00%	3.11%
2024-25	3.05%	3.00%	3.09% (1 <sup>st</sup> six months )

From the table given above, it is also clear that each year upto FY 2017-18, the transmission loss achieved by OPTCL has remained at a level lower than the approved figures by Hon'ble commission and from FY 2018-19 the target set by OERC appears to be very stiff which was hard to achieve though **the trend of lesser transmission loss year after year has been achieved.**

That the transmission losses depend upon the voltage level at which the power is transmitted. The transmission losses are higher where the percentage of lower voltage (132kV or below) transmission system is higher. A comparison of the average transmission losses of a few state transmission licensees and their corresponding transmission assets at low voltage level (132 kV) is shown below.



**TRANSMISSION LOSS (%) OF OTHER STATES OF LOW VOLTAGE LINES  
UPTO 132KV FOR FY 2023-24**

States	% of Low voltage Lines (up to 132 kV)			Actual Transmission Losses for 2023-24 (%)
	Transmission Lines up to 132kV (Ckm)	Total Transmission Lines (Ckm)	% Transmission Lines up to 132kV	
Odisha (OPTCL)	8479.831	16508.068	51.36%	3.11
Uttar Pradesh (UPPTCL)	28733	60145	47.77%	3.22
Gujarat (GETCO)	44512	73054	60.93%	3.83

It may be kindly be appreciated that the transmission loss (technical) is bound to happen as per law of physics and is very difficult to reduce after a certain level. Also, at all India level, the transmission loss of utilities have remained at more than 3.00% and to suffice our view point the table is given below for kind appreciation of Hon'ble Commission.

**Transmission loss of Different states for FY 2023-24**

Name of states	Tr. loss approved State Commission	Actual Tr. loss
Uttar Pradesh (UPPTCL)	3.22%(UERC)	3.22%
Gujarat (GETCO)	3.60% (GERC)	3.83%
Assam (AEGCL)	3.30%(AERC)	3.30%
Rajasthan (RVPN)	4.50%(RERC)	4.23%
Himachal Pradesh (HPPTCL)	3.19% (HERC)	3.25%

All India average transmission loss for the period 06-01-2025 to 12-01-2025 as published by Grid Controller Of India Limited, National Load Despatch Centre dated 18.01.025 is 4.00 %. Further, as per the CEA General Review 2024 (Containing Data for the Year 2022-23) the transmission loss of Eastern Region is 3.37% (attached as **Annexure-02**). Present transmission loss level of OPTCL is much less than both the said cases (i.e. Grid Controller Of India Limited & CEA General Review 2024).

However, as a responsible Transmission utility, OPTCL is making an all-out effort to reduce the transmission loss further by undertaking various **system operation and loss reduction measures** by implementing the emerging technologies like **system**



**Automation**, load bifurcation, **modification in system configuration**, procurement of more efficient equipment, **Digitalization of grids** by using SAS, Protection system improvement using Busbar protection and Event Logger, **Conversion of Radial to Ring system**, Advanced Metering Infrastructure etc. to bring it to **3.05% by FY 2025-26**.

#### **Steps taken for Energy Audit**

Around 2600 nos. of 0.2s Accuracy Class ABT Energy meters are required for different metering points at all Grid Substations of OPTCL for billing and audit purposes. 538 nos. of meters have been installed by OPTCL at different metering points. 2000 nos. energy meters will be installed at different Grid Substations under SAMAST Project, out of which 70nos.meters have been installed and the installation process of balance meters are in progress. The installation of energy meters for balance metering points under **SAMAST** Project will be completed by 31st October 2025. After installation of the meters, energy audit and calculation of transmission losses of OPTCL on an element-wise basis at different voltage levels will be feasible.

#### **Rejoinder to Para 8:**

##### **Determination of Transmission Charges**

The proposed Transmission Charge of 36.08 p/u has been derived by considering the recent realistic energy demand projections of 38764.29 MU as communicated by the DISCOMs & other LTOA customers and the ARR figures have been arrived by OPTCL justifying component wise projections as per the provisions contained in OERC Transmission Tariff Regulations, 2014, OPTCL's Audited Accounts for FY 2023-24, all relevant data/information and materials. The details of projections are submitted in page 51-52 of the present ARR application of OPTCL for FY 2025-26. Moreover, OPTCL had furnished all requisite information and details as per the prescribed formats of the Hon'ble Commission with full justifications.

Hence, OPTCL does not agree with the views of the Objector.

#### **Rejoinder to Para 9:**

##### **Reactive Energy Charges**

As per Regulation 31(1) under Chapter-7 (IMBALANCE AND REACTIVE ENERGY CHARGES) of the OERC (Terms and Conditions of Intra-State Open Access) Regulations, 2020, payment for the reactive energy charges by open access consumers shall be in accordance with provisions stipulated in the State Grid Code or as may be specified in relevant regulations/orders of the Hon'ble Commission .



The Hon'ble Commission in Para 16 (page 5) of the order dated 05.02.2019 in Case No. 50/2017 has inter alia viewed that the provisional reactive energy charges of 3 paise/KVARh as allowed in the ARR order of OPTCL for FY 2018-19 continue for time being till a final justification is submitted by OPTCL in consultation with the stakeholders. However, OPTCL **has not realized any revenue** from Reactive Energy Charges so far.

In view of the above, OPTCL proposes that 3paise/KVARh may be approved provisionally as Reactive Energy Charges for FY 2025-26.

Hence, rejection of the proposal of OPTCL with regard to Reactive Energy Charges as suggested by the Objector is not just and proper.

**Rejoinder to Para 10:**

**Levy of Grid Support Charges**

The benefits derived by the CGPs with co-located loads are enormous. The benefits are in the nature of ancillary services which are not paid till now. The Grid support charges (GSC)/Parallel operation charge has been levied by different state Regulatory Commissions and upheld by APTEL and Supreme Court of India through various orders and hence proposed by OPTCL through a separate petition. Recently, OPTCL had filed an application (case No. 44 of 2024) on 26.06.2024 for determination and approval for levy of Grid Support Charges for industries having Captive Generating / Cogeneration plants and running in parallel with the Grids of OPTCL. Hon'ble Commission in its order directed OPTCL to submit a consolidated report considering the observations/queries raised by the stakeholders in the earlier Cases filed by OPTCL. In compliance to above, OPTCL is in final stage of preparation of the required consolidated report and will be submitted before Hon'ble Commission shortly.

2. The objections not specifically admitted may be deemed to have been denied.

**PRAYER**

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of M/s. Vedanta Limited while approving ARR and Transmission Tariff of OPTCL for FY 2025-26 & Truing up application for the FY 2023-24.

By the Applicant  
Through

*Poabeer Kumar Mallick*

Sr. GM (EI.), RT&C

Bhubaneswar  
January 31, 2025





ODISHA ELECTRICITY REGULATORY COMMISSION  
BIDYUT NIYAMAK BHAWAN  
PLOT NO. 4, CHUNOKOLI, SHAILASHREE VIHAR,  
BHUBANESWAR – 751021

\*\*\*\*\*

No. OERC/DIR(T)-332/08/480

Dated: 01/05/2024

To

The Chairman-cum-Managing Director,  
OPTCL Ltd, Janpath, Bhubaneswar-22

**Sub: Calculation of Transmission charges for Long, Medium & Short-Term Open Access (RE) in accordance with OERC (Promotion of Renewable Energy through Green Energy Open Access) Regulation, 2023.**

Ref: OPTCL letter No. RT&C-Bill-09/2023-24/ 43 (4) dated 13.02.2024.

Sir,

With reference to the subject cited above, I am directed to intimate you that the Regulation 11(1) (b) under "Transmission charges" of the OERC (Promotion of Renewable Energy through Green Energy Open Access) Regulation, 2023 specifies that:

**" (1) Transmission Charges**

b) *For use of InSTS: As determined by the Commission in the ARR & Tariff Order for the relevant year. It shall be Rs./MW-Day for Long Term Access (LTA) and Medium Term Open Access (MTOA) whereas it shall be Rs./kWh for Short Term Open Access (STOA):*

*Provided that for RE generation inside the State, the transmission charges shall be computed Rs./kWh for long, medium and short term open access. The applicable normative losses shall be borne by the Green Energy Open Access consumers in kind through additional injection;*

*Provided further that for RE generation outside the State, the Intra-State transmission charges & losses shall be borne by Green Energy Open Access consumers as per applicable Regulations;*

*Provided further that the concession/exemption of the transmission charges applicable for Green Energy Open Access transaction shall be as determined & approved by the Commission in the Tariff Order of relevant year. "*

Further, regulation 20 (2) of OERC (Terms and Conditions of Intra-State Open Access) Regulations, 2020 regarding the transmission charges specifies as follows:

*"xxxx. Provided that transmission charges shall be payable on the basis of contracted capacity in case of long-term and medium-term open access consumers and on the basis of scheduled load in case of short-term open access consumers. For Open Access for a part of a day, the transmission charges shall be payable on pro-rata basis: xxxx"*

As per the aforementioned Regulation 11(1) (b) of the OERC (Promotion of Renewable Energy through Green Energy Open Access) Regulation, 2023, for RE generation inside the State, the applicable normative losses shall be borne by the Green Energy Open Access consumers in kind through additional injection and for the RE generation outside the State, the transmission losses shall be borne by Green Energy Open Access consumers. So, it is implied from the above that the transmission loss is a part of the consumption of energy and is made up through additional injection. In view of the above, it is clarified that for RE generation inside the State, the transmission charges shall be computed Rs./kWh for Long Term Access (LTA), Medium Term Open Access (MTOA) and Short Term Open Access (STOA) based on the actual energy consumption.

Calculation of transmission charges on actual energy basis for inter-state transactions will be difficult as the actual energy injected for the same transaction is not available with SLDC since it is based on scheduled energy as available from RLDC. Therefore, the charges for use of Intra-State network under Inter-State Open Access transactions of Renewable Energy shall be based on the energy which will be derived from their schedule as available with SLDC. The charges for Inter-State transaction of renewable energy for use of Intra-State network shall be paid on the basis of Rs./kWh.

Further, OERC has notified OERC (Promotion of Renewable Energy through Green Energy Open Access) Regulation, 2023 in the Odisha Gazette on 11.01.2024 which is effective from the date of its notification in such Gazette. All renewable energy Open-access transactions undertaken through the Intra-State network shall be governed under this Regulation from the effective date of Regulation notwithstanding any open-access transactions which had been continuing from a date prior to the effective date of the present Regulation.

This clarification is issued in exercising power under Regulation 15 (Power to remove difficulties) of OERC (Promotion of Renewable Energy through Green Energy Open Access) Regulations, 2023.

Yours sincerely,

SECRETARY

1.5.24

CC:

1. The Principal Secretary, Dept. of Energy, Govt. of Odisha, 2<sup>nd</sup> Floor, Kharavel Nagar, Keshari Marg, Bhubaneswar-751001.

2. The Chief Load Despatcher, SLDC, GRIDCO Colony. P.O. Mancheswar Rly. Colony. Bhubaneswar-751022.
3. The Chief Executive Officer, TPCODL, Power House Square, Unit-8, Bhubaneswar-751012.
4. The Chief Executive Officer, TPWODL, Burla, Sambalpur-768017.
5. The Chief Executive Officer, TPSODL, Courtpeta, Ganjam, Berhampur-760010.
6. The Chief Executive Officer, TPNODL, At/PO - Januganj, Balasore-756019

**Table 6.2**  
**Regional Transmission Losses**  
**Utilities**  
**2022-23**

Region	Energy Available in the Region (GWh)	Export to other Region (GWh)	Export to Nepal (GWh)	Export to Bangladesh (GWh)	Export to Bhutan (GWh)	Export to Myanmar (GWh)	Total Energy drawal by States/Utilities (GWh)	Transmission Losses (GWh)	Transmission Losses (%)
1	2	3	4	5	6	7	8	9 (2-3-4-5-6-7)	10((8/2)x100)
Northern Region	235784.74	3399.70	343.64	0.00	0.00	0.00	224171.69	7869.71	3.34
Western Region	282367.53	57344.05	0.00	741.34	0.00	0.00	215219.30	9062.84	3.21
Southern Region	173393.55	7625.46	0.00	3491.13	0.00	0.00	156314.82	5962.13	3.44
Eastern Region	134352.68	57191.16	314.03	7547.70	266.30	0.00	64506.41	4527.08	3.37
North Eastern Region	21117.54	4662.00	0.00	1039.50	38.47	9.81	14499.49	868.27	4.11

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION

Plot No.4, Chunokoli, Shailashree Vihar, Bhubaneswar, Odisha.

Case No: 93/ 2024

COMMENTS/ OBJECTIONS/ SUBMISSIONS ON BEHALF OF CCPPO, TO THE DETERMINATION OF AGGREGATE REVENUE REQUIREMENT AND TRANSMISSION TARIFF FOR THE FY 2025-26 FILED BY OPTCL.

**MOST RESPECTFULLY SHOWETH:**

The present set of comments/ objections are being filed by Confederation of Captive Power Association of Odisha (CCPPO), to the determination of Aggregate Revenue Requirement and Transmission Tariff for the FY 2025-26 filed by OPTCL.

Before dealing the above, it is necessary to submit that the Confederation of Captive Power Plants, Odisha (CCPPO) is an association of 29 major Industries in the State of Odisha having their own Captive Power Plants. The total installed capacity of captive generation in the State is 11, 844 MW. CCPPO serves as a platform for addressing the issues faced by the Captive Generating Plants ("CGPs") in the State of Odisha, besides sharing knowledge and technology with its members.

**SUBMISSIONS OF THE OBJECTOR:**

The Objector hereby makes the following submissions which may be taken into consideration by the Hon'ble Commission for the purpose of present proceedings.

Before delving into the merits of the petition CCPPO would like to make the following request before Hon'ble Commission.

1. It would be imperative to submit that all CGPs and Open Access consumers situated in the State of Odisha must mandatorily procure renewable power in order to fulfil their RPO in terms of Regulation 3.1(b) of the OERC RPO Regulations, 2021, which inter alia provides as under:

"3. *Scope of Regulations and Extent of their Application*

3.1 These Regulations shall apply to all "Obligated Entities" in the State of Odisha. The Obligated Entities include:

- (a) Distribution licensee (or any other entity procuring power on their behalf).
- (b) Any person who owns Captive Generating Plant including co-generation plants based on conventional fossil fuel with installed capacity of 1 MW & above, and consumes electricity generated from such Plant for his own use shall be subject to RPO to the extent of a percentage of his consumption met through such fossil fuel-based captive source.
- (c) Any person who consumes electricity procured from conventional fossil fuel-based generation through Open Access and third-party sale shall be subject to RPO to the extent of a percentage of his consumption met through such fossil fuel-based source;

Provided that the State Commission may, by order, modify/ revise the minimum capacity referred above from time to time."

That, under Regulation 4.2 of the said Regulations further stipulates mandated quantum of electricity which is to be procured from renewable sources by CGPs and Open Access consumer against the consumption of thermal power procured under Open Access in the State of Odisha along with other Obligated Entities, which is a percentage of the total consumption by such entity in kWh. The table providing such minimum quantum is reproduced hereinbelow:

Year	Solar RPO	Non-Solar RPO			Total RPO
		HPO	Other Non-Solar RPO	Total Non-Solar RPO	
2021-22	7.25%	0.18%	5.82%	6.00%	13.25%
2022-23	8.00%	0.35%	6.15%	6.50%	14.50%
2023-24	8.75%	0.66%	6.59%	7.25%	16.00%
2024-25	9.75%	1.08%	7.17%	8.25%	18.00%

It is evident from the above table that for the current financial year, CGPs and Open Access Consumers are obligated to fulfil its RPO to the tune of 18.00%, which comprises of solar power (9.75%) and total non-solar RPO (8.25%). against

the consumption of thermal power availed under Open Access regime by the obligated entity. The said quantum revised to the tune of 29.91% in draft OERC (Procurement of Energy from Renewable Sources and its Compliance) Regulations, 2024.

Year	Minimum quantum of electricity to be procured from Renewable Energy Sources by Obligated Entity as percentage of total Consumption of Electricity in KWh				
	<i>Wind Renewable Energy</i>	<i>Hydro Renewable Energy</i>	<i>Distributed Renewable Energy</i>	<i>Other Renewable Energy</i>	<i>Total Renewable Energy</i>
	(a)	(b)	(c)	(d)	(e)
2024-25	0.67%	0.38%	1.50%	27.35%	29.91%
2025-26	1.45%	1.22%	2.10%	28.24%	33.01%
2026-27	1.97%	1.34%	2.70%	29.94%	35.95%
2027-28	2.45%	1.42%	3.30%	31.64%	38.81%
2028-29	2.95%	1.42%	3.90%	33.10%	41.36%
2029-30	3.48%	1.33%	4.50%	34.02%	43.33%

- It is submitted that Govt of India has set an ambitious target to install 500 GW of Renewable Power by FY 2030. National Tariff Policy 2016 under clause 6.4 "Renewable sources of energy generation including Co-generation from renewable energy sources:" provides various guidelines to promote procurement of Renewable energy.
- As the demand of green Aluminium, green steel is continuously rising globally, and the introduction of **Carbon Border Adjust Mechanism** by European Union's wherein the European Nations places an emission tariff on imports. The CBAM will initially apply to imports of certain goods and selected precursors whose production is carbon intensive and at most significant risk of carbon leakage like cement, iron and steel, aluminium, fertilisers, electricity and hydrogen. In its 1<sup>st</sup> phase exporters has to share its carbon emission data with the products exported in EU nations. It is imperative for core manufacturing industries producing Aluminium, Cement, Steel, Fertilizers to switch in RE power in gradual manner to be globally competitive. As per the latest study by Centre for energy, Environment and Water the CABM tax would impact 43% of India's export to the

EU nations, India's second largest oversea market due to raising of cost and eroding competitiveness.

4. It is pertinent to mention here that State of Odisha is a manufacturing hub of India due to its vast reserves of mineral and industrial friendly policy made by Govt of Odisha. The state is the largest producer of iron and steel, stainless steel, primary Aluminium and thermal power in the country. These sectors are power intensive sector which need to be transitioned from thermal to green power in an economic viable manner to be globally competitive.

However, imposition of 100% of transmission charges on availing green power from outside of the state by the industries is making the cost of power highly uneconomic.

5. As the state have limited potential for solar and wind power which are commercial proven RE sources, it becomes vital for the industries to buy RE power from other states to comply RPO and use of green power to make greener product. In line with Odisha Renewable Energy Policy, dated 30.11.2022 Hon'ble Commission has already provided exemption on Intra State transmission charges, waiver on electricity duty, 50% waiver on CSS on the renewable power generated within the state. This is a welcome step which helps to promote the renewable energy power mix within the state. However, we would like to bring your kind attention on the point the increasing contribution of clean energy ultimately helps in decarbonize the existing level of use of thermal sources within the state thus, increasing consumption of green power by industries is also very critical thereby providing certain waivers/exemption in CSS would ultimately motivate industries to increase RE power consumption.
6. In view of the above submissions, CCPPO humbly prayed before Hon'ble Commission that the waiver/exemption on STU charges allowed in Odisha RE Policy 2022 for RE projects commissioned with in the state should be extended for procurement of green power from outside the State also.
7. **Transmission Losses:** OPTCL has proposed transmission loss at 3.05%. In conformity with the power sector reform, OPTCL needs to reduce the transmission loss significantly.



OPTCL should provide the details of the identified areas where loss is maximum in ARR petition. OPTCL has proposed transmission loss without giving the breakup of the losses in different components of transmission system i.e., lines, substations, power transformers and autotransformers etc. OPTCL should have to submit the energy audit report, and their standard performance should be monitored by third party auditor as appointed by the Commission.

8. **Determination of Transmission Charges:** The proposed Transmission Charge of 36.08 P/U is very high and should not be permitted. This will adversely affect the RST of the DISCOMS and will be a huge burden on the consumers of Odisha. The significant increase in expenses would impose an excessive burden on the general consumers of the State, as this would be passed on to the ultimate users through GRIDCO and DISCOMS. Therefore, the Commission may critically examine the proposal of OPTCL and take necessary steps in approving transmission charges.

OPTCL has proposed transmission charges @ 36.08 P/U for FY 2025-26 against 24 P/Unit as approved by the Commission during FY 2024-25. The proposed Transmission Tariff of 36.08 P/U is very high. It is therefore humbly prayed before Hon'ble Commission to consider these expenses based on actual expenditure and actual equity infusion.

9. **Reactive Energy Charges:** OPTCL has proposed to introduce Reactive Energy Charges of 3 Paise/KVARh. There is no such provision in the Transmission Tariff Regulation and against the spirit of Electricity Act 2003 and hence the proposal of OPTCL is required to be straight away rejected.

It is submitted that Commission provisionally approves reactive energy charges @ 3 paise/kVARh for the FY 2024-25 vide its order dated 13.02.2024 in Case No. 113 of 2023. However, despite approval of such charges for last four years subject to justification to be submitted by OPTCL, OPTCL has not yet submitted the required justification of reactive energy charges in consultation with the stakeholders. Therefore, OPTCL is requested to clarify whether the final justification regarding the reactive energy charges as proposed is submitted as per the Hon'ble Commission's order dated 05.02.2019 in case no. 50/2017. If the same has not yet been submitted by OPTCL then it is humbly prayed before commission

to not allow the proposed reactive energy charges for FY 2025-26 and to direct OPTCL to refund the reactive energy charges collected from last 4 years.

10. **Levy of Grid Support Charges (GSC):** OPTCL has filed an application (case No 44 of 2024) on 26.06.2024 for determination and approval for levy of Grid Support Charges for industries having Captive Generating / Cogeneration plants and running in parallel with the Grids of OPTCL. Hon'ble Commission in its order directed the OPTCL to submit a consolidated report within three months' time on or before 15.10.2024 considering the observations/ suggestions of the Director (Regulatory Affairs), OERC along with addressing observations/queries raised by the stakeholders in the earlier Cases filed by M/s. OPTCL regarding GSC.

The justification along with the consolidated report is not yet submitted by OPTCL before the Hon'ble Commission. Therefore, it is humbly prayed before Hon'ble Commission to direct OPTCL to share the report with affected parties if the same has already been submitted to OERC by OPTCL. It is humbly prayed to Hon'ble Commission to conduct public hearing of the application/petition including affected parties as respondent to the application/petition.

Place: Bhubaneswar

Date: 15.01.2025

*Debabrata Pal*  
Objector

**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION,  
BHUBANESWAR**

**CASE NO. 93 of 2024**

**IN THE MATTER OF:**

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64(2) and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**AND IN THE MATTER OF:**

**Odisha Power Transmission Corporation Ltd. (OPTCL)**  
Janpath, Bhubaneswar  
Odisha – 751022

**...Applicant**

**Confederation of Captive Power Plants Odisha (CCPPO)**  
Registration No. 21980/158  
IMFA Building, Bomikhal, Rasulgarh,  
Bhubaneswar, Odisha-751010

**...Objector**



**AFFIDAVIT**

I, Shri Debasish Pattnaik, S/o Shri P K Pattnaik aged about 57 years, resident of Bhubaneswar, do solemnly affirm and state as follows: -

1. That I am designated as Secretary of CCPPO, the objector in the matter and am fully authorised by CCPPO to make this affidavit on its behalf.
2. I have read the accompanying reply/comments, and I say that its contents are true to my knowledge and belief and based on records which are believed to be true and correct.

15 JAN 2025

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15-01-2025  
SAMARENDR SAAHOO  
NOTARY, BHUBANESWAR  
GOVT. OF ODISHA, INDIA  
REGD NO:- 22/08  
MOBILE: 9437277738

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3. The annexures, if any, filed along with the reply/comments are true copies of their respective original.

Place: Bhubaneswar

Date: 15.01.2025

*Debarish Palnesh*

Deponent



**VERIFICATION**

I, the objector above named do hereby verify that the contents of the above affidavit are true and correct to the best of my knowledge, no part of it is false and nothing material has been concealed therefrom.

Verified at Bhubaneswar on this 15<sup>th</sup> day of January 2025.

Place: Bhubaneswar

Date: 15.01.2025

*Debarish Palnesh*

Deponent

15 JAN 2025

*15-01-2025*  
SAMARENDRASAHOO  
NOTARY, BHUBANESWAR  
GOVT. OF ODISHA, INDIA  
REGD NO:- 22/08  
MOBILE: 943727738

**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION**

**PLOT NO. 4, CHUNAKOLI, SAILESHREE VIHAR,  
CHANDRASEKHARPUR, BHUBANESWAR-751021**

**CASE NO. 93/2024  
FILING NO. 3**

**IN THE MATTER OF:** (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**And**

(ii) Truing up application for the FY 2023-24 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

**AND**

**IN THE MATTER OF:** Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

**..... Applicant**

**vrs**

Confederation of Captive Power Plants Odisha (CCPPO),  
IMFA Building, Bomikhal, Rasulgarh, Bhubaneswar, Odisha-  
751010 & 15 Others.

**..... Objectors**

**Rejoinder to the objections raised by the Objector CCPPO**

**The humble applicant above named**

**MOST RESPECTFULLY SHEWETH:**

1. That the Objector CCPPO vide affidavit dated 15.01.2025 has made certain submissions on ARR & Transmission Tariff Application of OPTCL for FY 2025-26 and Truing up application for the FY 2023-24. In reply, OPTCL submits its rejoinder to the submissions in the following paragraphs.

**Rejoinder to Para 1 to 6:**

**Waiver/exemption on STU charges for inter-state RE power procurement**

In compliance to para 1 to 6, OPTCL submits the following:



(66)

*Prabhu Kumar Mallick*

- Industries are already benefiting from the waiver of transmission charges for the procurement of renewable energy (RE) power through the CTU network, which places a financial burden on all Designated Interstate Customers (DICs) including GRIDCO in the state of Odisha.
- The Hon'ble Odisha Electricity Regulatory Commission (OERC) in its letter No. OERC/DIR(T)-332/08/480 dated 01/05/2024 has already facilitated the procurement of RE power from outside the state by applying transmission charges on scheduled basis, rather than on contracted capacity. This initiative has benefitted industrial consumers procuring RE power. A copy of the aforesaid letter is attached as **Annexure-01**.
- It is important to note that OPTCL is undertaking the construction of transmission projects with significant associated costs. Further waivers on transmission charges for industrial consumers could place an additional burden on retail consumers. Therefore, the request from Vedanta should not be approved by the Hon'ble Commission.

**Rejoinder to Para 7:**

**Transmission Loss**

The actual transmission loss for the period **Apr' - Sep' 2024** is calculated to be **3.09%** as shown in the ARR & TT application for FY 2025-26 (page-229). This figure is **less than the actual** transmission loss during last year i.e. **3.11%** for **FY 2023-24**. In fact, OPTCL had projected Transmission loss of 3.05% for FY 2024-25, but Hon'ble Commission had set a target of 3.00% which could not be achieved yet.

In OPTCL system, the transmission loss is purely technical loss and a function of real time injection of power by a number of generators, system configuration and power flow requirements at different load centers. It depends on many parameters / factors such as distance and mismatch between generation and load centers, types of load, reactive power compensation, voltage profile, seasonal variation of demand load etc. Thus, OPTCL does not have much control over the same at any point of time. The transmission system of OPTCL operates as an integral part of the Eastern Region Grid to serve the internal demand of the State as well as to carry out import and export of power depending upon the system demand.

As of the matter of fact, some grid s/s and lines are being constructed in many remote and deprived areas funded under Central & State Govt. schemes in



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*Pooja Kumar Mallik*

the interest of public. Additional length in EHT lines and Sub-stations in under-loaded areas are also responsible for increase in transmission loss.

The Transmission Loss in OPTCL network is in a gradually reducing trend over the years i.e. from 3.73% during 2014-15 to 3.11% in 2023-24 and has remained 3.09% within 1<sup>st</sup> six months of FY 2024-25 mainly due to addition of infrastructure and various system strengthening works taken up by OPTCL. The actual losses incurred over the years by OPTCL have been within the margin allowed by Hon'ble Commission up to the year FY 2017-18. However in FY 2018-19, the commission set the loss at 3.00% though the projected transmission loss was at 3.25% and thereafter the commission has been pegging the transmission loss at the same level though loss projected by OPTCL remained in a downward trend.

Year	Tr. Loss proposed	OERC Approval	Actual
2014-15	3.75%	3.75%	3.73%
2015-16	3.75%	3.75%	3.67%
2016-17	3.70%	3.70%	3.58%
2017-18	3.50%	3.50%	3.34%
2018-19	3.25%	3.00%	3.28%
2019-20	3.25%	3.00%	3.25%
2020-21	3.20 %	3.00%	3.22%
2021-22	3.15%	3.00%	3.18%
2022-23	3.10%	3.00%	3.15%
2023-24	3.10%	3.00%	3.11%
2024-25	3.05%	3.00%	3.09% (1 <sup>st</sup> six months )

From the table given above, it is also clear that each year upto FY 2017-18, the transmission loss achieved by OPTCL has remained at a level lower than the approved figures by Hon'ble commission and from FY 2018-19 the target set by OERC appears to be very stiff which was hard to achieve though **the trend of lesser transmission loss year after year has been achieved.**

That the transmission losses depend upon the voltage level at which the power is transmitted. The transmission losses are higher where the percentage of lower voltage (132kV or below) transmission system is higher. A comparison of the average transmission losses of a few state transmission licensees and their corresponding transmission assets at low voltage level (132 kV) is shown below.



Poozbeer Kumar Mallick

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**TRANSMISSION LOSS (%) OF OTHER STATES OF LOW VOLTAGE LINES  
UPTO 132KV FOR FY 2023-24**

States	% of Low voltage Lines (up to 132 kV)			Actual Transmission Losses for FY 2023-24 (%)
	Transmission Lines up to 132kV (Ckm)	Total Transmission Lines (Ckm)	% of Transmission Lines up to 132kV	
Odisha (OPTCL)	8479.831	16508.068	51.36%	3.11
Uttar Pradesh (UPPTCL)	28733	60145	47.77%	3.22
Gujarat (GETCO)	44512	73054	60.93%	3.83

It may be kindly be appreciated that the transmission loss (technical) is bound to happen as per law of physics and is very difficult to reduce after a certain level. Also, at all India level, the transmission loss of utilities have remained at more than 3.00% and to suffice our view point the table is given below for kind appreciation of Hon'ble Commission.

**Transmission loss of Different states for FY 2023-24**

Name of states	Tr. loss approved by State Commission	Actual Tr. loss
Uttar Pradesh (UPPTCL)	3.22%(UERC)	3.22%
Gujarat (GETCO)	3.60% (GERC)	3.83%
Assam (AEGCL)	3.30%(AERC)	3.30%
Rajasthan (RVPN)	4.50%(RERC)	4.23%
Himachal Pradesh (HPPTCL)	3.19% (HERC)	3.25%

All India average transmission loss for the period 06-01-2025 to 12-01-2025 as published by Grid Controller Of India Limited, National Load Despatch Centre dated 18.01.025 is 4.00 %. Further, as per the CEA General Review 2024 (Containing Data for the Year 2022-23) the transmission loss of Eastern Region is 3.37% (attached as **Annexure-02**). Present transmission loss level of OPTCL is much less than above both the cases.

However, as a responsible Transmission utility, OPTCL is making an all-out effort to reduce the transmission loss further by undertaking various **system operation and loss reduction measures** by implementing the emerging technologies like **system Automation**, load bifurcation, **modification in system configuration**, procurement of more efficient equipment, **Digitalization of grids**



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*Prabbeer Kumar Mallick*



by using SAS, Protection system improvement using Busbar protection and Event Logger, **Conversion of Radial to Ring system**, Advanced Metering Infrastructure etc. to bring it to **3.05% by FY 2025-26**.

#### **Steps taken for Energy Audit**

Around 2600 nos. of 0.2s Accuracy Class ABT Energy meters are required for different metering points at all Grid Substations of OPTCL for billing and audit purposes. 538 nos. of meters have been installed by OPTCL at different metering points. 2000 nos. energy meters will be installed at different Grid Substations under SAMAST Project, out of which 70nos.meters have been installed and the installation process of balance meters are in progress. The installation of energy meters for balance metering points under **SAMAST** Project will be completed by 31st October 2025. After installation of the meters, energy audit and calculation of transmission losses of OPTCL on an element-wise basis at different voltage levels will be feasible.

#### **Rejoinder to Para 8:**

##### **Determination of Transmission Charges**

The proposed Transmission Charge of 36.08 p/u has been derived by considering the recent realistic energy demand projections of 38764.29 MU as communicated by the DISCOMs & other LTOA customers and the ARR figures have been arrived by OPTCL justifying component wise projections as per the provisions contained in OERC Transmission Tariff Regulations, 2014, OPTCL's Audited Accounts for FY 2023-24, all relevant data/information and materials. The details of projections are submitted in page 51-52 of the present ARR application of OPTCL for FY 2025-26. Moreover, OPTCL had furnished all requisite information and details as per the prescribed formats of the Hon'ble Commission with full justifications.

Hence, OPTCL does not agree with the views of the Objector.

#### **Rejoinder to Para 9:**

##### **Reactive Energy Charges**

As per Regulation 31(1) under Chapter-7 (IMBALANCE AND REACTIVE ENERGY CHARGES) of the OERC (Terms and Conditions of Intra-State Open Access) Regulations, 2020, payment for the reactive energy charges by open access consumers shall be in accordance with provisions stipulated in the State Grid Code or as may be specified in relevant regulations/orders of the Hon'ble Commission .

The Hon'ble Commission in Para 16 (page 5) of the order dated 05.02.2019 in Case No. 50/2017 has inter alia viewed that the provisional reactive energy charges of 3 paise/KVArH as allowed in the ARR order of OPTCL for FY 2018-19 continue for time being till a final justification is submitted by OPTCL in consultation with the

*Poojbeer Kumar Mallik*

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stakeholders. However, OPTCL **has not realized any revenue** from Reactive Energy Charges so far.

In view of the above, OPTCL proposes that 3paise/KVARh may be approved provisionally as Reactive Energy Charges for FY 2025-26.

Hence, rejection of the proposal of OPTCL with regard to Reactive Energy Charges as suggested by the Objector is not just and proper.

**Rejoinder to Para 10:**

**Levy of Grid Support Charges**

The benefits derived by the CGPs with co-located loads are enormous. The benefits are in the nature of ancillary services which are not paid till now. The Grid support charges (GSC)/Parallel operation charge has been levied by different state Regulatory Commissions and upheld by APTEL and Supreme Court of India through various orders and hence proposed by OPTCL through a separate petition. Recently, OPTCL had filed an application (case No. 44 of 2024) on 26.06.2024 for determination and approval for levy of Grid Support Charges for industries having Captive Generating / Cogeneration plants and running in parallel with the Grids of OPTCL. Hon'ble Commission in its order directed OPTCL to submit a consolidated report considering the observations/queries raised by the stakeholders in the earlier Cases filed by OPTCL. In compliance to above, OPTCL is in final stage of preparation of the required consolidated report and will be submitted before Hon'ble Commission shortly.

2. The objections not specifically admitted may be deemed to have been denied.

**PRAYER**

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of CCPPO while approving ARR and Transmission Tariff of OPTCL for FY 2025-26 & Truing up application for the FY 2023-24.

Bhubaneswar  
January 31, 2025

By the Applicant  
Through

*Poozbeer Kumar Mallick*

Sr. GM (EI.), RT&C



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ODISHA ELECTRICITY REGULATORY COMMISSION  
BIDYUT NIYAMAK BHAWAN  
PLOT NO. 4, CHUNOKOLI, SHAILASHREE VIHAR,  
BHUBANESWAR - 751021  
\*\*\*\*\*

No. OERC/DIR(T)-332/08/480

Dated: 01/04/2024

To

The Chairman-cum-Managing Director,  
OPTCL Ltd, Janpath, Bhubaneswar-22

**Sub: Calculation of Transmission charges for Long, Medium & Short-Term Open Access (RE) in accordance with OERC (Promotion of Renewable Energy through Green Energy Open Access) Regulation, 2023.**

Ref: OPTCL letter No. RT&C-Bill-09/2023-24/ 43 (4) dated 13.02.2024.

Sir,

With reference to the subject cited above, I am directed to intimate you that the Regulation 11(1) (b) under "Transmission charges" of the OERC (Promotion of Renewable Energy through Green Energy Open Access) Regulation, 2023 specifies that:

**" (1) Transmission Charges**

b) *For use of InSTS: As determined by the Commission in the ARR & Tariff Order for the relevant year. It shall be Rs./MW-Day for Long Term Access (LTA) and Medium Term Open Access (MTOA) whereas it shall be Rs./kWh for Short Term Open Access (STOA):*

*Provided that for RE generation inside the State, the transmission charges shall be computed Rs./kWh for long, medium and short term open access. The applicable normative losses shall be borne by the Green Energy Open Access consumers in kind through additional injection;*

*Provided further that for RE generation outside the State, the Intra-State transmission charges & losses shall be borne by Green Energy Open Access consumers as per applicable Regulations;*

*Provided further that the concession/exemption of the transmission charges applicable for Green Energy Open Access transaction shall be as determined & approved by the Commission in the Tariff Order of relevant year. "*

Further, regulation 20 (2) of OERC (Terms and Conditions of Intra-State Open Access) Regulations, 2020 regarding the transmission charges specifies as follows:

*"xxxxx. Provided that transmission charges shall be payable on the basis of contracted capacity in case of long-term and medium-term open access consumers and on the basis of scheduled load in case of short-term open access consumers. For Open Access for a part of a day, the transmission charges shall be payable on pro-rata basis; xxxxx"*

As per the aforementioned Regulation 11(1) (b) of the OERC (Promotion of Renewable Energy through Green Energy Open Access) Regulation, 2023, for RE generation inside the State, the applicable normative losses shall be borne by the Green Energy Open Access consumers in kind through additional injection and for the RE generation outside the State, the transmission losses shall be borne by Green Energy Open Access consumers. So, it is implied from the above that the transmission loss is a part of the consumption of energy and is made up through additional injection. In view of the above, it is clarified that for RE generation inside the State, the transmission charges shall be computed Rs./kWh for Long Term Access (LTA), Medium Term Open Access (MTOA) and Short Term Open Access (STOA) based on the actual energy consumption.

Calculation of transmission charges on actual energy basis for inter-state transactions will be difficult as the actual energy injected for the same transaction is not available with SLDC since it is based on scheduled energy as available from RLDC. Therefore, the charges for use of Intra-State network under Inter-State Open Access transactions of Renewable Energy shall be based on the energy which will be derived from their schedule as available with SLDC. The charges for Inter-State transaction of renewable energy for use of Intra-State network shall be paid on the basis of Rs./kWh.

Further, OERC has notified OERC (Promotion of Renewable Energy through Green Energy Open Access) Regulation, 2023 in the Odisha Gazette on 11.01.2024 which is effective from the date of its notification in such Gazette. All renewable energy Open-access transactions undertaken through the Intra-State network shall be governed under this Regulation from the effective date of Regulation notwithstanding any open-access transactions which had been continuing from a date prior to the effective date of the present Regulation.

This clarification is issued in exercising power under Regulation 15 (Power to remove difficulties) of OERC (Promotion of Renewable Energy through Green Energy Open Access) Regulations, 2023.

Yours sincerely,

SECRETARY

1.5.24

CC:

1. The Principal Secretary, Dept. of Energy, Govt. of Odisha, 2<sup>nd</sup> Floor, Kharavel Nagar, Keshari Marg, Bhubaneswar-751001.

2. The Chief Load Despatcher, SLDC, GRIDCO Colony, P.O. Mancheswar Rly. Colony. Bhubaneswar- 751022.
3. The Chief Executive Officer, TPCODL, Power House Square, Unit-8, Bhubaneswar- 751012.
4. The Chief Executive Officer, TPWODL, Burla, Sambalpur-768017.
5. The Chief Executive Officer, TPSODL, Courtpetta, Ganjam, Berhampur-760010.
6. The Chief Executive Officer, TPNODL, A/PO - Januganj, Balasore-756019

**Table 6.2**  
**Regional Transmission Losses**  
**Utilities**  
**2022-23**

Region	Energy Available in the Region (GWh)	Export to other Region (GWh)	Export to Nepal (GWh)	Export to Bangladesh (GWh)	Export to Bhutan (GWh)	Export to Myanmar (GWh)	Total Energy drawal by States/Utilities (GWh)	Transmission Losses (GWh)	Transmission Losses (%)
1	2	3	4	5	6	7	8	9 (2-3-4-5-6-7)	10((8/2)x100)
Northern Region	235784.74	3399.70	343.64	0.00	0.00	0.00	224171.69	7869.71	3.34
Western Region	282367.53	57344.05	0.00	741.34	0.00	0.00	215219.30	9062.84	3.21
Southern Region	173393.55	7625.46	0.00	3491.13	0.00	0.00	156314.82	5962.13	3.44
Eastern Region	134352.68	57191.16	314.03	7547.70	266.30	0.00	64506.41	4527.08	3.37
North Eastern Region	21117.54	4662.00	0.00	1039.50	38.47	9.81	14499.49	868.27	4.11



(B)

ODISHA ELECTRICITY REGULATORY COMMISSION Oerc <orierc@gmail.com>

(no subject)

1 message

(Case No. 93/2024)

alekh mallick <alekhmallick@gmail.com>  
To: orierc@gmail.com

Thu, Jan 16, 2025 at 8:30 PM

BEFORE ODISHA ELECTRICITY REGULATORY COMMISSION

IN THE MATTER OF :Application under Section 62 and 64(2) and all other relevant provisions of the Electricity Act 2003 read with OERC (Terms and Conditions for Determination of Transmissiin Tariff) Regulation 2014 and OERC Regulation 53(7) of the OERC (Conduct of Business Regulations 2004 for approval of ARR and determination of Transmisdion Tariff for the FY 2025-26 along with truingup applicationfor FY2023-24 filed by Odisha Power Transmission Corporation Ltd (OPTCL) before the Odisha aRegulatory Commission, Bhubaneswar -21.

AND

IN THE MATTER OF : OPTCL Janpath, Bhubaneswar  
... Applicant

INTHE MATTER OF : Sri Alekha Chandra Malik  
S/o Harekrusna Mallik  
335 City Garden Bhubaneswar  
751024

Intervenor

The humble applicant above named  
MOST RESOECTFULLY SHOWETH THAT  
The humble intervenor is a consumer and likes to intervene fir ootimal functioning of OPTCL.

1. List of all ongoing projects with details such as reason for taking up the project, date of commencement and exoected date of completion with reasons for delay if any.
2. Details of new 765 KV and associated network its cost reason for taking up the project implication on tariff and transmission loss and extent to which samevare to be borne by consumers of the State.

2. Whether necessary permission of competent authority and intimation to OERC were taken.

3. Whether power availed from outside specifically for meeting requirement of other than consumers will have implication on State consumers.

4. Whether initiative to strengthen state evacuation by elements of National Transmission network taken by OPTCL before CEA Transmission Committee or other such organisationsvresponsible to develop national network.

PRAYER

To ensure consumer of the State are not to pay Transmission Charges or Transmission Loss of the central or state utilities for the power required for others.

Bhubaneswar By the Deponent  
Signed  
16 Jan 2025 (Alekha Chandra

Malik)

(76)

**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
PLOT NO. 4, CHUNAKOLI, SAILESHREE VIHAR,  
CHANDRASEKHARPUR, BHUBANESWAR-751021**

**CASE NO. 93/2024**

**FILING NO. 3**

**IN THE MATTER OF:** (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**And**

(ii) Truing up application for the FY 2023-24 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

**AND**

**IN THE MATTER OF:** Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

**..... Applicant**

**vrs**

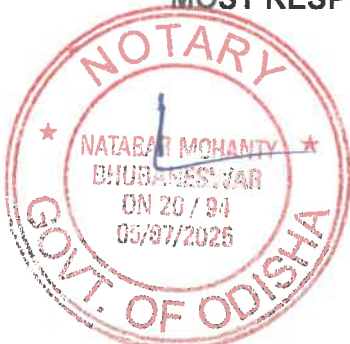
**Sri Alekha Chandra Malik, 335 City Garden, Bhubaneswar-751024 and 15 others.**

**..... Objectors**

**Rejoinder to the objections raised by the Objector Sri Alekha Chandra Malik.**

**The humble applicant above named**

**MOST RESPECTFULLY SHEWETH:**



*Prabeer Kumar Mallick*

1  
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1. That the Objector Sri Alekha Chandra Malik vide mail dated 16.01.2025 has raised certain submissions on ARR & Transmission Tariff Application of OPTCL for FY 2025-26 and Truing up application for the FY 2023-24. In reply, OPTCL submits its rejoinder to the submissions in the following paragraphs.

**Rejoinder to Para 1:**

List of all ongoing projects with details such as reasons for taking up the project, date of commencement and date of completion with reasons for delay is attached as **Annexure-01**. Almost all the ongoing projects are approved in Intra-state Transmission Plan, Business Plan and Investment proposal of OPTCL respectively.

**Rejoinder to Para 2:**

Details of key 765kV projects currently under active consideration in the state of Odisha are mentioned below:

**a) 765/400kV Paradeep & 765/400kV Gopalpur**

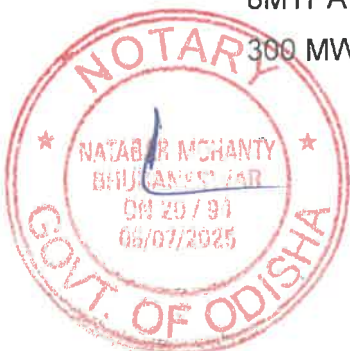
In order to facilitate upcoming Green Hydrogen and Green Ammonia industries, PGCIL is constructing 2 nos. of 765kV GSS at Gopalpur and Paradeep with 765 kV Angul – Duburi – Paradeep D/C line.

**b) 765/400kV Kolabira**

- In order to evacuate power from upcoming Floating Solar at Hirakud, Thermal Power from OPGC 5&6, Kolabira GSS with interconnections to the 765/400kV Substation at Sundargarh (PGCIL) and the proposed 765/400kV substation at Duburi of OPTCL.
- By linking **Kolabira to Sundargarh-B and Duburi through 765kV** transmission lines, two distinct 765kV corridors will be formed thereby ensuring reliable power exchange in Odisha. These corridors include:
  - i. Dharamjaygarh-A – Sundargarh-B – Duburi – Paradeep,
  - ii. Dharamjaygarh-B – Sundargarh-A – NLC-Talabira – Angul – Duburi – Paradeep.

**c) 765/400kV Duburi**

- 400/220kV New Duburi GSS at present is loaded with 630MW where M/s TATA Steel is drawing around 200MW. M/s TATA Steel have got a plan for expansion to 8MTPA and finally to 13MTPA leading to a load requirement of 1100MW and also 300 MW by M/s Jindal Steel Ltd.



- It has been proposed to construct a 765/400kV GSS at Duburi with connectivity from **LILO of 765kV Angul-Paradeep line at Duburi** and **765kV D/C line to Kolabira** to meet the load demand.

**d) 765/400kV Khuntuni**

- Presently, 400kV substations at Meramundali, Mendhasala and Duburi are feeding the load requirements in eastern part of Odisha. In the present scenario, loading at Meramundali – Mendhasala 400kV D/C and Meramundali (B) – Duburi 400kV D/C lines is about 450MW and 250MW per circuit respectively.
- New industries are planned to be set up at Neulapoi in Dhenkanal, Naraj and Gajmara areas. The present transmission system will be constrained with the inclusion of the above load. Accordingly, GSS like **765kV Khuntuni, 400kV Neulapoi and 400kV Naraj** has been planned intra-state by OPTCL:

Connectivity:

- 765kV D/C line from Angul to Khuntuni
- 400kV D/C line from Neulapoi to Khuntuni
- 400kV D/C line from Naraj to Khuntuni

All the above projects except 765kV Kolabira, 765kV Khuntuni and 400kV Naraj have been approved by OERC through revised 14<sup>th</sup> Intra-State Transmission Plan of Odisha for FY 2022-23 to FY 2026-27. Since the requirement for GSS at Kolabira, Khuntuni and Naraj is in a different time frame i.e. post FY 2026-27 depending upon the upcoming beneficiaries, the necessary approvals will be accorded in the subsequent 15<sup>th</sup> Intra-state transmission plan study.

**Rejoinder to Para 3:**

Odisha is a mineral-rich state with numerous large-scale industries in the steel and aluminum sectors. Additionally, the Government of Odisha through the *Utkarsh Odisha* event aims to attract a wide range of industries—large, medium and small—across key sectors such as chemicals, petrochemicals, textiles, mining, renewable energy, IT, tourism and food processing. Existing steel and aluminum industries are planning to expand their production capacities which will drive a significant increase in power demand. To facilitate the evacuation of power from large-scale renewable energy projects and meet the bulk power needs of these industries, the state envisions the development of 765 kV/400 kV GSS and transmission lines. These industries will not only provide employment opportunities but also contribute to the state's GDP growth.



Out of aforementioned projects, most of them are part of ISTS network. It is pertinent to mention that the aforesaid intra-state projects will not achieve its commercial operation in FY 2025-26, hence its consequence on tariff is extraneous in the present tariff application.

**Rejoinder to Para 4:**

New Transmission elements proposed by OPTCL to strengthen state evacuation are deliberated and approved in the CMETS-ER meeting, held on monthly basis which are further incorporated in National Transmission Network.

2. The objections not specifically admitted may be deemed to have been denied.

**PRAYER**

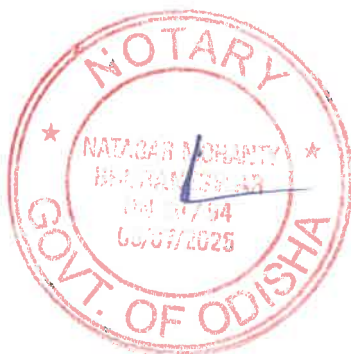
In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of Sri Alekha Chandra Malik while approving ARR and Transmission Tariff of OPTCL for FY 2025-26 & Truing up application for the FY 2023-24.

Bhubaneswar  
January 31, 2025

By the Applicant  
Through

*Prabir Kumar Mallik*

Sr. GM (EI.), RT&C



Sl. No.	Name of the Project with scope of work	OPRC Case NO. & Date of approval	Original work order No. & date/contract value	Scheduled date of completion	Revised date of completion if re scheduled	Expected date of completion (As per previous Review)	Expected date of completion	Progress Achieved, ( Till Sept.-2024 )	% of Progress	Balance to be completed	Reason of delay, if any	Cumulative Expenditure upto 30.09.2024 (Rs. Cr.)
1	132kV DC line between existing 220/132/33kV Grid Substation Turumunga and 132/33kV Dhenkikote Substation (Approx. Line Length-42.52 Km) with 2 nos. 132kV feeder bay extension at both end. Estimated Cost: Rs. 42.91 Cr. Award Cost: Rs. 32.16 Cr.	1. 79/2024 (P) 13.05.2024	Ms. Jagabandhu. LOA - CPC-27/2022/137 Dt:16.02.2023. Rs.32.16 Cr.	02/2025	---	02/2025	Jun-25	1. Foundation: Total Completed-19/160 Nos 2. Soil testing: 25 Nos locations completed. Test reports to be submitted by the agency for approval. 132 KV Bay Extension at Turumunga GSS: 1. Foundation: All Column & equipment foundation completed. 132 KV Bay Extension at Dhenkikote GSS: 1. All Equipment Foundation Completed.	10	132KV Transmission Line: Foundation: 141 Nos., Stringing : 160 Nos., 132 KV Bay Extension at Turumunga GSS: 80% 132 KV Bay Extension at Dhenkikote GSS:70%	Slow execution of work by the agency. Besides, Land Schedule is yet to be authenticated by concerned Tahasildar, resulting in delay in initiation of Forest Clearance process.	13
2	132kV SIC line from Patnagarh to Kantbhariji with 132 kv feeder bay extension both at Patnagarh & Kantbhariji. Estimated Cost: Rs. 28.27 Cr. Award Cost: Rs. 24.25 Cr.	1. 05/2024 (P) 13.05.2024	Ms. JDC Infratech WO- No-770/18.11.2022 Rs. 24.25 Cr.	11/2024	---	03/2025	06/2025	Check survey of line completed and the HAL and SABIK status under process. DGPS survey base point completed. Foundation work of 132 KV Bays at Kantbhariji and Patnagarh Bay completed. 7 Mtrs. Road under construction. Foundation: 57/146, Erection: 01/46, Stringing: 026/93 KM	Line - 15%	Foundation 88 Erection : 39.98 KM Stringing : 39.98 KM	Forest Clearance: CA land has been identified (36 Ha Degraded Forest), Gram sabha consent taken. Alignment to be done by DFO. Towering: operation under progress. E filing planned in January 24. (61 foundations in forest land) (Area - 16.04 Ha.)	6.55
3	132kV SIC line from Padampur to Ghens with 132 kv feeder bay extension both at Padampur & Ghens. Estimated Cost: Rs. 28.80 Cr. Award Cost: Rs. 22.94 Cr.	1. 05/2024 (P) 13.05.2024	Ms. Abhishek WO No-848/14.12.2022 Rs. 22.94 Cr.	11/2024	---	02/2025	04/2025	Foundation : 11/4150, Erection : 46/150, Stringing : 04/047 KM Patnagarh Bay foundation and equipment erection completed. PCC work in progress. Nupada, Bay foundation and equipment erection completed except Circuit Breaker. Earth Flat work in progress	Line - 50%	Foundation : 36, Erection : 10, Stringing : 40.47 KM	Forest Clearance: Total forest land is less than 1 Ha. DLC report received from Tahasildar but with no forest land in line. It is being taken up with SDC. Alignment for necessary clearances. (8 foundations in forest land (Area - 0.93 Ha.)	10.28
4	400kV DIC line from TTPS Stage-II to Meramundali-B & arrangement for LOA no. SIG.MI-CPC-e-400kV-DIC-LILO-TTPS to Meramundali-B GSS at Meramundali-B. Awarded Cost: Rs. 48.68 Cr.	New Project	Ms. Groma Infrastructure Limited-Hydrabad LOA no. SIG.MI-CPC-e-400kV-DIC-LILO-TTPS to Meramundali-B 837(14)DL. 06.09.2024	03/2026	---	---	03/2026	CPBG approved	---	---	New Project	NIL
5	132kV SC line through UG cable laying from existing 220/132/33kV Grid Substation in Beharapur with one 132kV bay extension at both end i.e. Nareetrapur & Beharapur. Estimated Cost: Rs. 79.83 Cr.	New Project (DRPS-II)	MS. Sterlite Power Transmission Ltd JV with M/S ADS Systems & Construction Pvt. Ltd. LOA No-249. Dt:04.10.2023. Estimated Cost: Rs. 79.83 Cr.	01/2026	---	---	01/2026	Work yet to started	---	---	New Project	NIL
6	132kV UG Cabling from 220/132/33kV Grid S/S Samargala to 132/33kV Grid S/S (S/C With One spare cable) with two nos 132kV Bay extension work	New Project (DRPS-II)	M/S Sterlite Power Transmission Ltd JV with M/S ADS Systems & Construction Pvt. Ltd. LOA No-249. Dt:04.10.2023. Estimated Cost: Rs. 79.83 Cr.	03/2025	---	---	03/2025	NIL	---	---	New Project	NIL
DIVERSION OF LINE												
7	Division of 400kV & 220kV lines with 220KV LULO arrangement for Meramundali-B. SCOPE: Division of 400kV line-01 no 220KV UG cable 1.85 km. Estimated Cost: 41.53 Cr. Awarded Cost: Rs.41.53 Cr	1. 63/2020 (BP) 03.11.2021	MS. A.K. Das Associates Ltd. JV with M/s Cable Corporation of India Ltd. W/O No. 001/1101. Dt: 03.20.19 Rs.41.53 Cr.	03/2020	03/2023	220KV:- Charged on Dt:31.12.2021 400KV:- 11/2024	Apr-25	1. 220kV Line CKT-I & CKT-II Charged on 31.12.2021. 2. 400 KV Line 1920 nos. Foundation- 1620 nos. Erection- 1620 nos. Stringing- 256kmts/4.98 kms.	75%	400 KV Line- Foundation: 01 nos Erection : 4 nos. Stringing : 4.634 kms.	1. Profile changed due to NH highlighting & widening.UG cabling undertaken 2. Non-Availability of Tower Materials 3. Due to Severe ROW	34.29
BAY EXTENSION WITH TRANSFORMER												
8	Installation of 3rd ICT with 400kV & 220kV bay extension at New Duburri. Estimated Cost:18.42Cr. Awarded cost:20.76 Cr. (3rd BOCQ)	1. 63/2020 (BP) 03.11.2021	Ms. A.K.Das Associates Ltd. JV GPIL W/O No 2183 dt: 02.05.2018	06/2018	06/2021	09/2024	Apr-25	Both the Bays works : Completed 315 MVA Transformer previously under the scheme has been upgraded to 500 MVA to meet upcoming demands Work order has been placed and the transformer is currently under manufacturing.	90%	Installation of ICT	Diversion of 315 MVA Transformer to Meramundali due to burnt of ICT. Tri Procurement/Upgradation of Bus Bar protection module.	17.03

STATUS OF ONGOING PROJECTS TILL SEPTEMBER-2024

Sl. No.	Name of the Project with scope of work	OERC Case No. & Date of approval	Original work order No. & date/contract value	Scheduled date of completion	Revised date of completion if re-scheduled	Expected date of completion (As per previous Review)	Expected date of completion	Progress Achieved, ( Till Sept.-2024 )	% of Progress	Balance to be completed	Reason of delay, if any	Cumulative Expenditure upto 30.09.2024 (Rs. Cr.)	
1	400kV	3	4	5	6	7	8	9	10	11	12	13	
1	<p><b>400kV</b></p> <p><b>Pkg-I:GSS</b>                      2x500MVA, 400/220/23kV GIS at Erasama, Paradeep.                      Pkg-II: Associated lines i. 400kV DC line from Loc. No. 358 to Loc. No. 182                      ii. 220kV DC line from proposed GIS Erasama to existing 220kV Paradeep GSS.                      iii. 2 nos. of 220kV feeder bay extension at Paradeep GSS.                      Pkg-III: Associated lines i. 400kV DC line from Loc. No. 1 to Loc. No. 182                      ii. 220kV DC line from proposed GIS Erasama to 220kV Pratapsasan GSS                      iii. 2 nos. of feeder bay extension at Pratapsasan GSS. Scope of Works : i) Installation of 2 Nos. of 500MVA Trf. ii) 400kV line : 156kms, iii) 220kV line : 96kms, Estimated Cost: 637.45 Cr.                      Award Cost: Pkg-I: 209.32 Cr., Pkg-II: 233.36 Cr., Pkg-III: 194.77 Cr.</p>	<p>1. 18/2017 (TP) 09.04.2019                      2. 63/2020 (BP) 03.11.2021                      3. 57/2021 (IP) 12.01.2022</p>	<p>Package-I: (GSS) M/s BHEL/LOI issued on dt.03.12.2022                      Package-II: (Associated Line) M/s R.S. Infra projects Pvt. Ltd. in JV with M/s A K das associates Pvt. Ltd. LOI issued on dt.24.12.2021                      Package-III: (Associated Line) M/s Transrail Lighting Pvt. Ltd. LOI issued on dt.24.12.2021                      Total Project Cost : Rs.866.82Cr</p>	<p>Pkg I : 12/2024</p>	Contract in force	04/2025	03/2026	<p>M/s. BHEL: Status of Project (At Erasama) :                      1. Back filling: 60% completed.                      2. Concrete casting: 100% completed.                      3. 400kV GIS building: 40% completed.                      4. 220kV GIS building: 40% completed.                      5. 22kV bus duct: 100% pike completed &amp; pike cap under progress.                      6. 400kV bus duct: 100% pike completed &amp; pike cap under progress.                      7. ICT: 80% completed.                      8. Remaining wall &amp; boundary wall-cum-retaining wall: 80% completed.                      9. Boundary wall: 26% completed.                      10. Foundation: 70% completed.                      Status of Project (At New Duburi):                      1. 15/20 nos. of column foundation are completed at New Duburi.                      2. Equipment details: LA-3/6, CVT-3/6, PI-4/7/70, Isolator- 7/10, Reactor- 50%, Bay Kiosk - 20%, CT-1/2/2, CB-MIP, back filling- 30%.</p>	50%	WIP	Delayed due to new structure design, testing & foundation in wind zone-VI and also low laying area & poor SBC value of soil entire sub-station pile foundations are adopted which consumes lot of time & severe ROW issue.	50.59	
1	<p><b>400kV</b></p> <p><b>Pkg-I:GSS</b>                      2x500MVA, 400/220/23kV GIS at Erasama, Paradeep.                      Pkg-II: Associated lines i. 400kV DC line from Loc. No. 358 to Loc. No. 182                      ii. 220kV DC line from proposed GIS Erasama to existing 220kV Paradeep GSS.                      iii. 2 nos. of 220kV feeder bay extension at Paradeep GSS.                      Pkg-III: Associated lines i. 400kV DC line from Loc. No. 1 to Loc. No. 182                      ii. 220kV DC line from proposed GIS Erasama to 220kV Pratapsasan GSS                      iii. 2 nos. of feeder bay extension at Pratapsasan GSS. Scope of Works : i) Installation of 2 Nos. of 500MVA Trf. ii) 400kV line : 156kms, iii) 220kV line : 96kms, Estimated Cost: 637.45 Cr.                      Award Cost: Pkg-I: 209.32 Cr., Pkg-II: 233.36 Cr., Pkg-III: 194.77 Cr.</p>	<p>1. 18/2017 (TP) 09.04.2019                      2. 63/2020 (BP) 03.11.2021                      3. 57/2021 (IP) 12.01.2022</p>	<p>Package-I: (GSS) M/s BHEL/LOI issued on dt.03.12.2022                      Package-II: (Associated Line) M/s R.S. Infra projects Pvt. Ltd. in JV with M/s A K das associates Pvt. Ltd. LOI issued on dt.24.12.2021                      Package-III: (Associated Line) M/s Transrail Lighting Pvt. Ltd. LOI issued on dt.24.12.2021                      Total Project Cost : Rs.866.82Cr</p>	<p>Pkg II : 12/2023</p>	---	04/2025	03/2026	<p>M/S R.S. Infra projects Private Ltd.:                      1. 400 KV Tr. Line from Loc-182 to Erasama. Pile foundation-12 Nos. Pile cap-164 Nos.                      Foundation -164 Nos.                      Erection All &amp; stringing-All                      Foundation -164 Nos.                      Pile foundation-164Nos.                      Pile cap-119 Nos.                      Foundation -119 Nos.                      Erection All &amp; stringing-All</p>	15%		Delayed due to new tower design, testing & foundation in wind zone-VI and also low laying area erections are adopted which consumes lot of time & severe ROW issue.	44.8	
1	<p><b>400kV</b></p> <p><b>Pkg-I:GSS</b>                      2x500MVA, 400/220/23kV GIS at Erasama, Paradeep.                      Pkg-II: Associated lines i. 400kV DC line from Loc. No. 358 to Loc. No. 182                      ii. 220kV DC line from proposed GIS Erasama to existing 220kV Paradeep GSS.                      iii. 2 nos. of 220kV feeder bay extension at Paradeep GSS.                      Pkg-III: Associated lines i. 400kV DC line from Loc. No. 1 to Loc. No. 182                      ii. 220kV DC line from proposed GIS Erasama to 220kV Pratapsasan GSS                      iii. 2 nos. of feeder bay extension at Pratapsasan GSS. Scope of Works : i) Installation of 2 Nos. of 500MVA Trf. ii) 400kV line : 156kms, iii) 220kV line : 96kms, Estimated Cost: 637.45 Cr.                      Award Cost: Pkg-I: 209.32 Cr., Pkg-II: 233.36 Cr., Pkg-III: 194.77 Cr.</p>	<p>1. 18/2017 (TP) 09.04.2019                      2. 63/2020 (BP) 03.11.2021                      3. 57/2021 (IP) 12.01.2022</p>	<p>Package-I: (GSS) M/s BHEL/LOI issued on dt.03.12.2022                      Package-II: (Associated Line) M/s R.S. Infra projects Pvt. Ltd. in JV with M/s A K das associates Pvt. Ltd. LOI issued on dt.24.12.2021                      Package-III: (Associated Line) M/s Transrail Lighting Pvt. Ltd. LOI issued on dt.24.12.2021                      Total Project Cost : Rs.866.82Cr</p>	<p>M/S Transrail Lighting Ltd :                      1. Open cast foundation- 63/20                      Pile foundation-4/762                      Pile cap-2082                      Total foundation completed-53/182                      Erection-52/182 6. stringing-NIL                      220 KV Tr. Line from Paradeep to Pratapsasan : (61.19kms)                      1. Open cast foundation-21/73                      Pile cap-15/48                      Pile foundation-15/714                      Total foundation completed-36/222                      Erection-16/222 6. stringing-NIL</p>	<p>Pkg III: 12/2023</p>	---	04/2025	03/2026	<p>400 KV Tr. Line from New Duburi to Loc-182                      1. Open cast foundation- 57 Nos.                      Pile foundation-15 Nos.                      Pile cap-42 Nos.                      4.Foundation -89Nos                      5. Erection-20 Nos                      Stringing-5/ 81 kms                      6. Foundation -119 Nos                      Pile cap-134 Nos.                      1. Open cast foundation- 52 Nos.                      Pile foundation-52 Nos.                      Pile cap-134 Nos.                      4. Foundation -186 Nos.                      5. Erection-206 Nos.                      stringing-61.19 kms</p>	46%		Delayed due to new tower design, testing & foundation in wind zone-VI and also low laying area pile foundations are adopted which consumes lot of time & severe ROW issue.	103.3
1	<p><b>220kV</b></p> <p>2x20 MVA, 220/33kV S/S at Dasapalla and associated LILo line (JICA)                      SCOPE :                      1. 220kV LILo-31.428kms                      Estimated Cost: 64.08 Cr.                      Award Cost: 59.26 Cr.</p>	<p>1. 05/2016 (BP) 30.07.2016</p>	<p>M/s Tata Projects Limited                      Pkg -JICA 07-Kiakata &amp; Dasapalla-50/2016/523 dt.29.01.2018                      Rs. 59.26 Cr.</p>	01/2020	04/2022	12/2024	Jun-25	<p>All foundation &amp; erection work completed.                      Overall 90% work completed.                      Foundation: 106 /109                      Erection: 99/109                      Stringing:- 22.525/23.498kms.</p>	S/S-50% Line-90%	Balance Work in progress. 220kV Line: Foundation: 1 nos. Erection: 10 nos. Stringing:- 6.873 kms.	Line passes through reserved forest area. (Forest issue). Delay in obtaining forest clearance	45.90	
2	<p>2x160MVA + 1x20MVA, 220/132/33kV S/S at Kiakata and associated 220kV &amp; 132kV lines (JICA)                      SCOPE                      1. 60/2016 (BP) 18.10.2017                      2. 63/2020 (BP) 03.11.2021                      Estimated Cost: 155.11Cr.                      Award Cost: 160.19 Cr.</p>	<p>1. 60/2016 (BP) 18.10.2017                      2. 63/2020 (BP) 03.11.2021</p>	<p>M/s Tata Projects Limited                      Pkg -JICA 07-Kiakata &amp; Dasapalla-50/2016/523 dt.29.01.2018                      Rs. 160.19 Cr</p>	01/2020	07/2023	03/2025	Dec-25	<p>1. Sub-Station: 95% completed.                      2. 132kV Bay Extension: 96% completed.                      3. 132kV bay Extension: Charged on 29.10.2021.                      4. Transmission line:                      i) Katapali to Kiakata (220kV line)                      1. Foundation: 346/447 nos.                      2. Erection: 323/447 nos.                      3. Stringing: 41.228/127.855 kms.                      ii) Bough to Kiakata. (132kV line.)                      1. Foundation : 72/73                      2. Erection : 72/73                      3. Stringing : 12.615kms. / 19.500kms.</p>	S/S-95% Line-93% 220kV-70%	Balance Work in progress. Transmission line: i) Katapali to Kiakata. (220kV line) 1. Foundation: 99 Nos. 2. Erection: 124 Nos. 3. Stringing: 86.627 kms ii) Bough to Kiakata. (132 K.V. line.) 1. Foundation: 01 Nos. 2. Erection: 01 Nos. 3. Stringing: 6.685 kms.	Severe ROW & delay in getting NHAI, Railway & Forest Clearance and pile foundation in Mahanadi River.	124.25	

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1	2x20MVA, 220/33KV S/S at Balliguda and 220KV Keshinga, Balliguda DC line SCOPE: 220KV bay extn. at Keshinga 33KV bay- 5 220KV fdr. bay extn.- 2 Estimated Cost: 98.98 Cr. Award Cost: 102.93 Cr.	1. 05/2016 (BP) 30.07.2016 2. 11/2012 (IP) 10.02.2014	M/s Flowmore Ltd. JV M/s Cobra WO 1017 & 1022 dtd.11.02.2015 Rs. 102.93 Cr. & Amend amount-115.19Cr.	06/2017	03/2022	Jun-25	Mar-26	Most of the work completed 220KV Bay extension at Keshinga: charged on 22.10.2021 220KV Line: Foundation: 326/988 Erection: 299/988 Stringing: 0/101 kms.	S/S-95% Line-85%	Line: Foundation- 62 nos. Erection- 89 nos. Stringing- 101 kms.	Line passes through reserve forest area.	90.7
2	2x160MVA 220/132KV & 2x63MVA 132/33KV, 220/132/33KV GIS at Ballanta (Benapur), BBSR and associated 220KV L/O O/H L/O line using monopole DC tower & 132KV O/H transmission line using monopole (SCRIPS) SCOPE: 220KV bay-05 132KV bay-07, 33KV bay-07 220KV L/O O/H line on monopole- 12 kms. 132KV O/H line on monopole- 08 kms. Estimated Cost- Award Cost: 139.20 Cr.	1. 18/2017 (TP) 09.04.2019 2. 63/2020 (BP) 03.11.2021	M/s TATA Projects Ltd. W/O No: 174 dt: 08.03.2019 Rs.139.20 Cr.	09/2020	12/2022	12/2024	06/2025	220KV L/O line: Foundation: Piling: 46/48 Pile Capping with riser: 46/48 Erection: 42/48 Stringing: 7/10.174 Km 220/132/33KV GIS Substation:- 1. Boundary wall: 466/650 Meters. 2. Store shed & security shed completed. 3. Control room building: F.F. plastering completed. Inside cable trench completed. 4. 132KV Equipment foundation: 37/48 5. Bus Duct foundation - 35/25 6. GIS Building cable trench completed & plinth beam completed. 7. 132KV GIS equipment tm. Completed. 8. Outdoor cable trench started. (250 mtr. Completed) 9. PEB Building erection 98 % completed. 10. Retaining wall foundation -37 mtr. Completed. 11. GIS Building Brick wall completed, plastering completed & painting under progress. 12. Control Room building- Painting & Flooring work 85% completed.	S/S- 70% Line-90%	S/S : Work in progress. 220KV L/O line: Foundation: Piling: 2 Pile Capping with riser:2 Erection: 6 Stringing: 03.174 Km	Land handed over on 31.07.2020 (17 months delay)	79.71
3	Construction of 2x160 MVA, 2x40 MVA 220/132/33 KV Grid Sub-Station with SAS at Chhennipada along with Line from existing 220/33KV Grid Sub-station at Rengali (Line Length-36.30KM approx.) and 132 KV D/C Line from existing 132/33 KV Grid Sub-station, Boinca (Line Length- 42 KM approx.) With 2nos. 220KV bay extension at Rengali and 2nos. 132KV bay extension at Boinca. Estimated Cost: 149.45 Cr. Award Cost: 113.83 Cr. (Excluding Transformers)	New Project (OTSSP-I)	M/S Associated Power structure Pvt. Ltd. LOA Dated 14.08.2023. Rs.113.83 Cr.	08/2025	---	08/2025	08/2025	220KV LINE Soil Testing is in Progress Foundation drawing Approved and Stub Received at Site 132KV LINE Foundation Drawings Approved 13 Nos. Foundation completed. SUB-STATION:- Lease Deed Completed Layout, SLD and section drawings under preparation. Boundary wall (South side & North side ) in progress. Switchyard Soil testing Completed. Boinca sub-station Soil Cutting Filling is completed	Work is in Progress.	Work is in Progress.	Severe ROW due to land acquisition by different mines.	6.4
4	Construction of proposed 2 x 40 MVA 220/33 KV Grid Sub-Station at Saranai with 220KV L/O Line of 220 KV Kapatra - Kapatra Line (20km Approx) Estimated Cost:66.14 Award Cost: 59.98Cr	New Project (OTSSP-I)	M/s Empowertrans LOA NO. 255 dated 12.09.2024 Rs 59.98 Cr.	03/2026	---	08/2026	03/2026	1. Land demarcation of 20 Ac done by Tahsildar on dated 29.07.2024. 2. Limited time from demarcated time it to be re-located to adjacent land. 3. MCC from Saranai to Tahsildar after proclamation period of 15 days. i.e. 28.11.2024	New Project	New Project	Advanced possession awarded for 20 acre of land in Rempur Tahsil.	NIL
5	Construction of 2x40 MVA 220/33 KV Grid Sub-Station with SAS at Jenharada Parjant and 220 KV D/C L/O Line from existing along with associated 220 KV D/C Transmission Line from existing. 220KV Maramandali -Dubut D/C Line. Estimated Cost:37.43 Cr Award Cost:35.54 Cr.	New Project (OTSSP-I)	M/s Empowertrans LOA dated 26.02.2024 Rs.35.54 Cr.	08/2025	---	08/2025	08/2025	Boundary Wall Completed SLD.Layout-Section is under progress.	WIP	WIP	Obstruction by Villagers during Construction of Boundary Wall.	0.41

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1	2X20MVA, 132/33KV Ghd S/S Lamtaput with SAS and its associated 132KV LILLO line.	1. 63/2020 (BP) 03.11.2021 2. 45/2021 (P) 27.12.2021	Ms SALASAR Techno Engineering Ltd. W.O. No. 5862 dt. 28.11.2018 Rs. 26.32 Cr.	5	6	7	8	9	10	11	12	13
2	132 KV Bay: 6 +2 (Unequipped) 33 KV Bay: 7 + 2 (Unequipped) 132 KV LILLO line: 1.0 km. Estimated Cost: 30.06 Cr. Award Cost: 28.32 Cr.			12/2020	06/2023	02/2025	04/2025	Foundation: All foundations completed Erection: Structure erection completed Earthing: SW Yard Primary Earthing completed. Cable Trench: Civil work completed, Cable tray erection under progress. Transformer: (1x20 MVA delivered) delivered at site but not installed due to blasting. Foundation for 02 Nos. Completed. 7 mtr read: 241/350 Mtr Completed. 3.75 mtr Road: 340/600 Mtr Completed. E-Type Quarter Finishing WIP. Root work in progress. 132 KV Side Blasting and Excavation work is Completed (10 % of Rock & Soil removal under progress) 2 Nos. 132KV Spare Bay: Column and Equipment Foundation Elevation & Crating Work under progress (Casting of CT/CP; & LA Casting Completed). 132KV Side Equipment Raiser, erdmat laying and welding work in progress. 132KV 633KV Column & Beam Earthing test work Completed. Transmission line Foundation: 05/05. Erection: 05/05 Stringing: 15/15 KM	S/S-93% Line-100%	Earthing of Switchyard. And Erection of Equipments. Testing and commissioning.	Hilly Area (Hard Rock) Issue in transportation due to hard rock in the S/S site, leveling of S/S area delayed.	21.74
3	2X20MVA, 132/33KV Ghd S/S at Tarbha with associated 132KV line. SCOPE: 132KV Tr. Bay: 2 nos 132KV Feeder Bay: 2 nos Bus Coupler Bay: 1 no. 33 KV Feeder Bay: 2 nos. 33 KV Bus Coupler Bay: 1 no. 132 KV LILLO line: 1.5 kms. Estimated Cost: 31.69 Cr. Award Cost: 26.53 Cr.	1. 63/2020 (BP) 03.11.2021 2. 57/2021 (P) 12.01.2022	WO-No-1025/31.12.2021 Rs. 26.53 Cr.	06/2023	...	12/2024	06/2025	SUB-STATION: Boundary Wall Completed. Foundation (132 KV Side): T1 & T4=26/26, CT=15/15, CVT=06/06 LA=12/12, S1=09/09, P1=18/18, D1=04/04, PT=03/03 Foundation (33KV Side): T8 & T9=24/24, Erection: T8 & T9=15/24, S1=9/9, P1=15/15, PT=3/3, CT=18/18, D1=07/07, 132KV LINE- Foundation: 09/11, Erection: 05/11, Store Shed: Completed, Control Room: Ground floor slab casting is completed. E-Type Quarter: Column upto Linel level completed.	S/S: 75% Line: 60%	Severe RoW Issue resolved and Boundary wall started with police protection on 29.05.2022	8.55	
4	2X63MVA, 132/33KV GIS at Satyanagar, BBSR (SCRIPS) SCOPE 132KV bay-07 nos, 33KV bay-10 nos 132KV UG cabling. 1. Ganqusa to Satyanagar- 5.3 kms. 2. Ganqusa to Manchewar B- 2.2 kms. 3. Manchewar-B to Satyanagar-6 kms. 4. Unit-VIII to Satyanagar- 3.672kms. Estimated Cost: Rs. 210.04 Cr. (Both Satyanagar & Badagada) Award Cost: Rs.170.65 Cr. (Both Satyanagar & Badagada)	1. 19/2017 (TP) 09.04.2019 2. 63/2020 (BP) 03.11.2021	Ms Sterlite Power Transmission Ltd. JV with Ms MAVIN Switchgears & Control Pvt. Ltd. W/O No. 114 dt. 22.02.2019	02/2021	02/2022	03/2025	Satyanagar: Contour survey & Soil investigation completed. Land utilization plan approved. ERT & Plate Load test completed. 1. GIS Building foundation completed including backfilling, Plinth beam under progress. 2. 63 MVA Transformer fdn. started. Badagada: Dismantling of existing 33/11KV S/S completed & project work to be started by agency. UG Cable: 1. Badagada to Kesura Router: 6.6Km/6.6 Km completed. 2. Manchewar B to Kudakkal 132KV UG cabling under progress (2.5/5.46 km) 3. Satyanagar - Kudakkal 132KV UG cabling under progress (5.47/5.1 km) 4. Satyanagar- Badagada 132KV UG cabling under progress. (9/5.92 km) 5. Satyanagar- Unit- 8 132KV UG cabling under progress. (2.5/2.55 km.) 6. Satyanagar- Manchewar 132KV UG cabling under progress. (5.86/6.89 km)	Satyanagar S/S- 5% Badagada S/S- NIL UG Cable- 70%	S/S: WJP Line: Transmission Foundation - 02 Nos., Erection- 05 Nos. Stringing- 1.5kms	Delay in dismantling works of existing 33/11KV S/S at Satyanagar by M/s SIMENS.	96.65	
5	2X63MVA, 132/33KV GIS at Badagada, BBSR (SCRIPS) SCOPE 132KV bay-07 nos, 33KV bay-10 nos. 132KV UG cabling. 1. Badagada to Satyanagar- 6.5 kms. 2. Badagada-Kesura- 6.65 kms. Estimated Cost: Rs. 210.04 Cr. (Both Satyanagar & Badagada) Award Cost: Rs. 170.65 Cr. (Both Satyanagar & Badagada)	1. 19/2017 (TP) 09.04.2019 2. 63/2020 (BP) 03.11.2021		02/2021	02/2022	05/2025	Satya Nagar -07/2025 Badagada: 07/2025	GIS at Satyanagar: WJP and GIS at Badagada yet to be started.				

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1	2	3	4	5	6	7	8	9	10	11	12	13
8	Construction of 2x40MVA, 220/33KV GSS at Harabasta and 220KV LLO arrangement from 220KV Mandhata-Bhanjanagar line at Harabasta. Estimated Cost:52.69 Cr. Award Cost:46.38 Cr.	New Project (OTSSP-I)	M/s Empowertrans. -15.03.2024. Rs.46.38 Cr. LoA -	09/2025	---	08/2025	09/2025	Contractual formalities,Layout preparation, Drawing approval & Procurement under progress	New Project	Work yet to be started	Work yet to be started	NIL
9	Construction of 2x40MVA, 220/33KV GSS at Mandhata and 220KV LLO arrangement from 220KV Prantapada-Elumina at Mandhata. Estimated Cost:75.51Cr. Award Cost:72.50 Cr.	New Project (OTSSP-I)	M/s Anamraja. -15.03.2024. Rs.72.50 Cr. LoA	03/2026	---	03/2026	03/2026	Contractual formalities,Layout preparation, Drawing approval & Procurement under progress	New Project	Work yet to be started	Work yet to be started	NIL
10	Construction of 2x40MVA, 220/33KV GSS Khatkote and 220KV LLO arrangement from 220KV Mandhata-Abr line at Khatkote. Estimated Cost: Rs. 44.44 Cr. Award Cost: Rs.41.98 Cr.	New Project (OTSSP-I)	M/s Empowertrans Pvt. Ltd. LoA-07.03.2024	09/2025	---	---	09/2025	Contractual formalities,Layout preparation, Drawing approval & Procurement under progress	New Project	Work yet to be started	Work yet to be started	NIL
11	Construction of proposed 2 X 40 MVA 220/33 KV Grid Sub-Station at Medinipur Rampour with 220KV LLO Line at 220 KV Khatkote. (As per OTSSP-I) 220 KV Trf Bay 2 nos. 220KV Feeder Bay, 2 nos. 220KV Bus Coupler Bay, 1 no. 33 kV Feeder Bay, 5 nos. 33 kV Bus Coupler Bay, 2 nos. 33 kV Trf Bay, 2 nos. 33 kV Bus Coupler Bay, 2 nos. 33 kV Trf Bay, 2 nos. 33 kV Bus Coupler Bay. Estimated Cost:60.80 Cr. Award Cost: 60.85Cr.	1. 63/2022 (IP) 29.04.2023	M/s Sidharth Engineering Ltd. LoA NO. 204 dated 08.08.2024	02/2026	---	---	02/2026	Substation land: Proclamation completed; Die-reservation proposal is with Collector, Kalaahandi.	New Project	Work yet to be started	As there is some cultivation on land, Tahasildar will be able to give land possession after harvesting of standing crop. Land is expected for hand over by December 24.	NIL
1	2x63MVA, 132/233KV GIS at Nayapalli, BBSR (SCRIPS) SCOPE: 132KV bay- 07 nos. 33KV bay- 10 nos. 132KV UG cabling- Mancheswar AIS to Nayapalli- 6.0 kms. Unit-VIII to Nayapalli- 6.0 kms. Ekamra park to Nayapalli- 3.0 kms. 132KV AIS bay extension at Mancheswar AIS. Estimated Cost- Award Cost-87.88 Cr.	1. 63/2020 (BP) 03.11.2021 2. 49/2021 (TP) 12.01.2022	M/s A.K.Das Associates Ltd JV with M/s Cable Corporation of India Ltd. W.O No. 154 dtd. 07.03.2019. Rs. 87.88Cr.	09/2020	09/2022	08/2024	Charged on 23.10.2024	Charged on 05/2024	Charged on 05/2024 (spillover WIP)	Charged on 05/2024	Breaking of existing CESU building and cleared land handed over on 25.05.2020 (Delay of 14 months)	60.02

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Sl. No.	Name of the Project with scope of work	OERC Case NO. & Date of approval	Original work order No. & dated contract value	Scheduled date of completion	Revised date of completion if re scheduled	Expected date of completion (As per previous Review)	Expected date of completion	Progress Achieved, ( Till Sept.-2024 )	% of Progress	Balances to be completed	Reason of delay, if any	Cumulative Expenditure upto 30.09.2024 (Rs. Cr.)
1	2	3	4	5	6	7	8	9	10	11	12	13
6	Construction of 2X20 MVA, 132/33 KV AIS Sub-station with SAS at Ahramallik & associated 132 KV LILo Transmission Line ( Approx. Line Length-21.132 Km.) on 132 KV Bough-Kakata DC line. Estimated Cost: 39.01 Cr. Award Cost: 39.64 Cr.	1. 63/2022 (IP) 29.04.2023	Ms. MBH Power Private Limited, LOA No. S/G.M.-CPC-16-Tender- Anamallik S/S- 67/2021/699 Dated 10.10.2022. Rs.39.64Cr	10/2024	***	03/2025	10/2025	SUB-STATION:- Equipment and Structure Foundation & Erection Completed. Control Room Roof Casting Completed. Transformer Foundation & Erection Completed. TRANSMISSION LINE:- Foundation: 35/62. Erection: 0/62. Stringing: 0/21. 132Kv	S/S:- 65% T/L:- 17%	S/S : Work is in Progress. Transmission line: (132KV line.) 1. Foundation : 47 2. Erection : 82 3. Stringing 21:132KM	Delay is Sub-Station Land Handing Over and Delay due to Forest Clearance.	20.15
7	Construction of 132/33 KV Grid S/S at Agalpur-Rampur & associated 132 KV LILo Line on 132 KV Bolangir-Barpali Line SCOPE: 132KV line feeder bay : 2 nos 132KV transformer Feeder Bay: 2 nos. 132KV Bus Coupler Bay : 1 no. 132KV Spare Bay : 2 no. 20 MVA, 132/33 KV transformer 2 nos 33 KV line Feeder Bay: 5 nos. 33KV transformer Feeder Bay: 2 nos. 33KV Bus Coupler Bay : 1 no. 33KV Spare Bay : 2 no. Estimated Cost: 35.06 Cr. Award Cost: 32.99 Cr.	1. 63/2022 (IP) 29.04.2023	M/S Empowertrans Private Limited, W/O-NO-40503.06.2023 Rs. 32.99 Cr.	06/2025	***	06/2025	06/2025	132 KV SIDE: 1 132KV Line Survey completed. 2 Land Contour Survey completed. 3 Soil Testing completed. SUB-STATION: 4. Boundary wall- 500*100. 5 33KV SIDE- 78 & 16 column foundation: 23/23. S/S:- 25/23. 6 33KV Transformer Foundation: 100% 7 33KV Transformer Foundation: 100% 8 33KV Transformer Foundation: 100% 9 33KV Transformer Foundation: 100% 10 33KV Transformer Foundation: 100% 11 33KV Transformer Foundation: 100% 12 33KV Transformer Foundation: 100% 13 33KV Transformer Foundation: 100% 14 33KV Transformer Foundation: 100% 15 33KV Transformer Foundation: 100% 16 33KV Transformer Foundation: 100% 17 33KV Transformer Foundation: 100% 18 33KV Transformer Foundation: 100% 19 33KV Transformer Foundation: 100% 20 33KV Transformer Foundation: 100% 21 33KV Transformer Foundation: 100% 22 33KV Transformer Foundation: 100% 23 33KV Transformer Foundation: 100% 24 33KV Transformer Foundation: 100% 25 33KV Transformer Foundation: 100% 26 33KV Transformer Foundation: 100% 27 33KV Transformer Foundation: 100% 28 33KV Transformer Foundation: 100% 29 33KV Transformer Foundation: 100% 30 33KV Transformer Foundation: 100%	WIP	Forest land involvement in line portion	8.84	
8	Construction of 132/33KV GGS at Jharbandh with associated 132KV LILo line from 132KV Padmapur - Nuspada line SCOPE: 132KV line feeder bay : 2 nos 132KV transformer Feeder Bay: 2 nos. 132KV Bus Coupler Bay : 1 no. 132KV Spare Bay : 2 no. 20 MVA, 132/33 KV transformer 2 nos 33 KV line Feeder Bay: 5 nos. 33KV transformer Feeder Bay: 2 nos. 33KV Bus Coupler Bay : 1 no. 33KV Spare Bay : 2 no. Estimated Cost: 38.68 Cr. Award Cost: 37.83 Cr.	1. 05/2024 (IP) 13.05.2024	M/S GPIL, W/O- NO-392/31.05.2023 Rs. 37.83 Cr.	11/2024	***	11/2024	06/2025	1. Land Contour Survey completed and Line Check Survey completed. 2. Boundary wall 300*100/305. 3. Control Room Column above with box-360*6 Nos and Brick work is under progress. 132 KV SIDE/FOUNDATION/TT/LS-20/20 T/S-6/6 Transformer. Ratt-2/2, CT=9/15, VT=9/6 LA=6/12, S/S= 3/9 D/I=3/4 LINE TOWER 4/AS.	WIP	Forest land involvement in line portion in SABIK Record	1.78	
9	Construction of 132/33KV Grid S/S, Rajahar with SAS and its associated 132 KV LILo line from 132KV Debussan-Umerkote DC Line. SCOPE: 132KV bays: 5+2, un-equipped 33KV bays: 7+2, un-equipped Estimated Cost: 47.39 Cr. Award Cost: 45.00 Cr.	1. 79/2024 (IP)	M/s Abhishek Contech India Pvt. Ltd. BBSR M/s Aksh Bharati Constructions Pvt Ltd. BBSR LOA No. 2251/1. Dated 07.03.2024 Rs. 45.00Cr	09/2025	***	09/2025	09/2025	Sub-station: Boundary Wall Completed. LUP has been approved conditionally Form-1 submitted for land lease and is under progress	WIP	WIP		0.79
10	Construction of 132/33 KV Sub-station Bijepur with SAS (132 KV Bay-05 Nos. 02 FDR, 02 TRF, 01 B/C & 2nos un-equipped spare bay) & (33 KV Bay-08 Nos., 05 FDR, 02 TRF, 01 B/C & 2nos un-equipped spare bay) and associated 132 KV LILo line (8.00 kms approx) on 132 KV New Bargam - Ghens DC Line Estimated Cost: 27.76 Cr. Award Cost: 26.62 Cr	1. 79/2024 (IP)	M/s Ommehar JV M/s ASB W/O-NO-40503.06.2024 Rs. 26.62Cr	09/2025	***	09/2025	09/2025	1. check survey of line is completed. 2 Boundary Wall - 800 Mts completed and plastering work under progress. 3. Soil testing is completed. 4. construction of approach road is under progress. 5. Construction power commissioning is awaited.	WIP	WIP	New Project	0.67

OTHER PROJECTS

Sl. No.	Name of the Project with scope of work	OERC Case NO. & Date of approval	Original work order No. & date/contract value	Scheduled date of completion	Revised date of completion if re-achieved	Expected date of completion (As per previous Review)	Expected date of completion of completion	Progress Achieved, (Till Sept-2024)	% of Progress	Balance to be completed	Reason of delay, if any	Cumulative Expenditure upto 30.09.2024 (Rs. Cr.)
1	2	3	4	5	6	7	8	9	10	11	12	13
1	132KV DIC line from Parlakhemundi to R.Udayagiri. SCOPE: 1. 132KV for Bay: 04 nos.. 132KV line- 63.623 kms. (Loc-232) Estimated Cost: Rs. 41.82 Cr. Award Cost: Rs. 41.82 Cr.	1. 65/2020 (BP) 03.11.2021	M/s JDC Infratech Pvt. Ltd., Balasore, W.O. No. dt.30.03.2018 Rs. 41.82 Cr.	03/2020	06/2021	12/2024	Dec-25	R-Udayagiri End: Column & Equipment erection work, Cable trench & earthing work completed. Parlakhemundi End: Completed and charged on dated 21.01.2021 132KV Transmission Line: Foundation: 253/258 nos. Erection: 243/258 nos. Stringing : 27.86/65.97 kms.	85%	Transmission Line: Foundation: 08 nos. Erection: 15 nos. Stringing : 38.11 kms.	Forest Clearance issues	34.11
2	132KV Jayanagar-Sunabeda line (Existing SIC Tower) (39.24 kms) SCOPE : 1. 132 KV Bay -02 nos. 1.32 KV DC line - 39.70 kms. Estimated Cost : Rs.27.82 Cr. Award Cost: Rs. 22.63 Cr.	1. 05/2016 (BP) 30.07.2016	M/s JEPL JV M/s.J.D Construction WO-5301 & 5306 dt.04.07.2013	01/2016	06/2020	08/2024	Charged on 15.10.2024	Charged on 10/2024		Charged on 10/2024	ROW issue & hilly area	21.54
3	220KV LILO line from one circuit of existing 220KV TTPS-JODA/DIC Line (Circuit-II) to 220/33KV GIS Substation, Keonjhar SCOPE: 1. 220KV Line : 14 kms. Estimated cost: 28.97 Cr. (including bay extension) Award Cost: 12.46 Cr. (Only Line)	1. 65/2020 (BP) 03.11.2021	M/s Empowertrans Pvt. Ltd W.O. No. 411 Dtd. 03.02.2020 Rs. 12.46 Cr.	02/2021	09/2021	02/2025	Jun-25	220KV Transmission Line: 1. Foundation : 44/52 Nos 2. Erection : - 19/52 Nos 3. Stringing : - 0/13, 414 kms.	60%	220 KV line . Foundation: 08 nos. Erection: 33 nos. Stringing: 13.414kms.	ROW & Forest Clearance issues	9.05
4	132KV DC line from 220/132/33KV S/S (Banar (Jaipatra)) to 132/33KV S/S at Junagarh along with associated bay extension work at Jaipatra & Junagarh S/S. SCOPE: 02 nos. feeder bay at Junagarh S/S. 132KV line : 47.285 kms. Estimated cost: Rs. 36.46 Cr. Award Cost: Rs. 36.46 Cr.	1. 65/2020 (BP) 03.11.2021 2. 57/2021 (IP) 12.01.2022	M/s SR Associates Infrastructure Pvt. Ltd LOA No. SGAN-CPCL- Tender-(132KV Jaipatra-Junagarh Line PKG- 57/2018-19/03173 dated 02.08.2019. Rs. 36.46 Cr.	08/2021	***	03/2025	03/2025	Sub station: Bay extension foundation work at Jaipatra & Junagarh end completed 132KV Transmission Line: Foundation- 138/176 nos. Erection- 63/176 nos. Stringing- 2.67/47.285 kms.	50%	Bay Extension work in progress Transmission Line: Foundation: 40 nos. Erection: 113 nos. Stringing: 44.615 kms.	Agency has requested for short closure of the project.	8.61
5	132KV DC line from Boudh to Phulbani with associated bay extension work at both ends. SCOPE: 1. 132KV dr. bay- 4 nos.. 132KV DC line- 65.82 kms. Estimated Cost: Rs. 39.36 Cr. Award Cost: Rs. 44.98 Cr.	1. 05/2016 (BP) 30.07.2016	M/s Siddharth Engineering Ltd., JV M/s Deepak Cables (India) Ltd. LOA. 2173 & 2178 dt. 30.03.2016 Rs. 44.98 Cr.	03/2018	03/2023	12/2024	06/2025	132KV Transmission Line: Foundation- 226/248 nos. Erection- 208/248 nos. Stringing- 37.9 / 65.82 kms. OPGW Stringing- 28.381 / 65.82 kms. KV bays at Boudh S/S Charged on 03/02/2021 at 21.23 Hrs. 132 KV bays at Phulbani S/S Charged on 11/12/2020 at 13.37 Hrs.	85%	Transmission Line: Foundation- 22 nos. Erection- 26 nos. Stringing- 26.369 kms. OPGW - 36.106 kms.	1. Delay in obtaining Forest Clearance (18.75 Hrs.) 2. ROW Issue	45.67
6	132 KV LILO line from Loc. No. 72 to 74 or existing 132 KV Boudhpadar-Sundargarh (CKT-II) line to 220/132/33 KV GSS, Bamra and two nos of 132 KV feeder bay extension at Bamra. SCOPE: Substation : 132 KV Feeder Bay-02 Line : 35.429 KM DIC Line : 33.39 Cr. Estimated Cost: Rs. 33.39 Cr. Award Cost: Rs. 31.30 Cr.	1. 05/2024 (IP) 13.05.2024	M/s Alekh Bharati Constructions Pvt. Ltd., Bhubaneswar. M/s JDC Infratech Pvt. Ltd., Balasore-756001. LOA No: 763, Dtd 17.11.2022.	11/2024	***	11/2024	11/2025	Bay Extension: 1) Equipment foundation and cable trench completed. 2) Earthmat completed. 3) All BUS stringing and equipment structure erection completed. 132 KV Transmission Line : Foundation - 51/151 Erection - 0/151 Stringing - 0 / 35.429 Km 220 KV Line diversion Foundation - 02/03 Erection - 0/03 Stringing - 0 / 1.786 Km	40%	Bay Extension Testing and Commissioning 132 KV Transmission Line : Foundation - 100 Erection - 151 Stringing - 35.429 Km 220 KV Line diversion Foundation - 01 Erection - 03 Stringing - 1.786 Km	Bay and line work under progress.	6.53

**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur  
Bhubaneswar-751021**

Case No: 93/2024

Filing No: 1

**IN THE MATTER OF:**

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**AND**

**IN THE MATTER OF:**

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022

**... Applicant**

**AND**

**IN THE MATTER OF:**

M/s. Power Tech Consultants, Corporate office at K-8-82, Kalinga Nagar, Ghatikia, Bhubaneswar-751029, Odisha. Phone No 9437155337, Email: pwrтч@gmail.com

**... Respondent**

**Affidavit verifying the application**

I, Mr. Bibhu Charan Swain, son of Mr. Baishnab Charan Swain, aged about 48 years, working as Sr. Consultant of M/s. Power Tech Consultants having its corporate office at K-8-82, Kalinga Nagar, Ghatikia, Bhubaneswar-751029, Odisha do hereby solemnly affirm and state as follows: -

1. That I am working as Sr. Consultant at M/s. Power Tech Consultants and I am duly authorized to swear this affidavit on its behalf.

The statements made herein now are based on information and I believe them to be true.

THE ABOVE NAMED DEPENDENT BEING IDENTIFIED BY..... P.K. Dalibera

ADV. BBSR APPEARS BEFORE ME AND STATE AN OATH ON..... 15/1/2025

..... THAT THE CONTENTS OF THIS AFFIDAVIT ARE TRUE TO THE BEST OF HIS/ HER KNOWLEDGE

**Authorized Signatory**

**P.K. DALIBERA**  
Notary, Bhubaneswar  
Regd. No. ON-46/09

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**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION**  
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**... Applicant**

**AND**

**IN THE MATTER OF:**

M/s. Power Tech Consultants, Corporate office at K-8-82, Kalinga Nagar, Ghatikia, Bhubaneswar-751029, Odisha. Phone No 9437155337, Email: pwrтч@gmail.com

**...Respondent**

**The humble respondent above named most respectfully submits as under:**

1. M/s. Power Tech Consultants (hereinafter referred as PTC), a firm registered in Odisha State under the Indian Partnership Act, 1932 with its Corporate cum correspondence office at K-8-82, Kalinga Nagar, Ghatikia, Bhubaneswar-751029, Odisha.
2. PTC is submitting the following points on the application of OPTCL for determination of Annual Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 for kind review and necessary action by the Hon'ble Commission.
3. **Human Resources Expenses:**

The OPTCL has projected Employee Cost expenditure at Rs. 554.05 Crore for FY 2025-26 against Rs. 488.63 Crore as approved by the Commission to be spent during FY 2024-

**M/s. Power Tech Consultants**  
*Signature*  
**Authorised Signatory**

25. The summary of Employee Expenses of OPTCL for the last fourteen financial years is furnished below.

**Summary of Employee Expenses**

Financial Year	Proposed	Approved	Actual
2010-11	865.13	279.56	173.11
2011-12	952.06	338.14	279.56
2012-13	655.36	318.48	268.59
2013-14	341.2	289.3	191.70
2014-15	361.38	318.18	309.59
2015-16	310.02	305.23	285.95
2016-17	399.56	292.55	382.44
2017-18	462.33	304.5	380.32
2018-19	419.57	360.4	375.65
2019-20	421.99	419.77	394
2020-21	466.22	415.87	373.19
2021-22	532.73	457.88	474.83
2022-23	526.53	477.19	
2023-24	508.76	449.08	
2024-25	582.06	488.63	
2025-26	554.05		

OPTCL may provide a detailed employee list cadre wise approved sanctioned strength by Govt. of Odisha vis-avis actual post filled up and post laying vacant.

The cost break-up of the employee expense is provided below:

Sl. No	Particulars	Prev. Year 2023-24	Curr. Year 2024-25	Ensuring Year 2025-26
A	<b>Salary &amp; Allowance</b>	1	2	3
1	Basic Pay	156.70	156.69	160.16
2	Dearness Allowance	69.32	89.75	97.70
3	House Rent Allowance	23.18	25.07	25.87
4	Medical Allowances	7.51	8.71	8.41
5	Conveyance Expenses (Allowance + Reimbursement)	2.84	3.42	3.88
6	Other Allowance	1.28	1.53	1.96
7	Bonus	0.01	0.01	0.01

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8	Stipend for New Recruitment	8.49	10.00	10.53
9	Stipend to Apprentice	1.64	3.00	2.74
10	Arrear Salary for Wage Board Revision	-	6.65	-
	<b>Sub-total (A)</b>	<b>270.97</b>	<b>304.83</b>	<b>311.27</b>
<b>B</b>	<b>Additional Employee Cost</b>			
1	Out Sources Engagement	3.46	5.58	6.81
	<b>Sub-total (B)</b>	<b>3.46</b>	<b>5.58</b>	<b>6.81</b>
<b>C</b>	<b>Other Employee Cost</b>			
1	Leave Travel Concession	0.09	0.63	0.63
2	Honorarium	0.09	0.12	0.12
3	Ex-gratia	7.20	5.00	8.84
4	Staff Welfare Expenses	11.07	6.75	10.81
5	Other Employee Cost	0.52	0.02	0.02
6	Capacity Building Charges	1.05	1.02	2.40
	<b>Sub-total (C)</b>	<b>20.02</b>	<b>13.54</b>	<b>22.83</b>
<b>D</b>	<b>Terminal Benefits</b>			
1	Pension	165.77	170.41	175.53
2	Gratuity	11.66	12.01	12.37
3	Leave Salary	14.79	15.16	15.62
4	Other (including contribution to NPS)	21.91	22.62	24.52
	<b>Sub-total (D)</b>	<b>214.12</b>	<b>220.20</b>	<b>228.03</b>
<b>E</b>	<b>Total Employees Cost (A+B+C+D)</b>	<b>508.57</b>	<b>544.15</b>	<b>568.95</b>
<b>F</b>	<b>Less: Employees Cost Capitalised</b>	<b>14.90</b>	<b>14.90</b>	<b>14.90</b>
<b>G</b>	<b>Net Employee Cost (E-F)</b>	<b>493.67</b>	<b>529.25</b>	<b>554.05</b>

- **Basic Pay and Grade Pay:** Basic Pay and Grade Pay proposed for FY 25-26 = Rs. **160.16** Cr. is based on actual cash flow for FY 24-25 with additional increment of 3% and average number of employee. OPTCL is planning to recruit 172 Nos. employees during FY 2024-25 and 280 Nos. in FY 2025-26.
- **DA:** OPTCL proposed 61% DA for FY 2025-26, considering Finance Dept guidelines. However, actual increase in DA may be reviewed.
- **HRA:** OPTCL proposed HRA @19%. Actual cash flow may be considered.
- **Outsourcing:** OPTCL is functioning with 50% of manpower and has outsourced services. Accordingly, Rs. 6.81 Cr. has been proposed towards payment to outsourced personnel. The same can be reviewed.
- OPTCL is planning to recruit 172 Nos. employees during FY 2024-25 and 280 Nos. in FY 2025-26 and has proposed Rs.10.53 Cr. towards stipend for the new recruiters. Considering the past trend of recruitment the same may be reviewed.

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**M/s. Power Tech Consultants**  
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**Authorised Signatory**

- Actual addition of employees is lesser than the approved. Stipend and employee cost should be approved by reviewing proposed addition of employees.
- Terminal benefits should be reviewed on actual cash flow basis.

Hence the Employee cost Expenses of OPTCL for FY 2025-26 may be approved accordingly by the Hon'ble Commission.

#### 4. Repair and Maintenance (R&M) expenses

That the OPTCL has projected Repair and Maintenance Expenses at Rs. 217.7 Cr for FY 2025-26 against Rs. 135 Crs as approved by the Commission to be spent during FY 2024-25.

The summary of Repair and Maintenance (R&M) expenses of OPTCL for the last fourteen financial years is furnished below.

#### Summary of R & M Cost

Financial Year	Proposed	Approved
2010-11	98.14	60
2011-12	93.89	75
2012-13	95.46	95
2013-14	108.91	60
2014-15	146.77	93
2015-16	154.11	108
2016-17	170.66	110.59
2017-18	155.11	124.97
2018-19	156.19	111
2019-20	115.22	115.22
2020-21	140.59	115.22
2021-22	151.1	118.61
2022-23	148.04	110.5
2023-24	164.34	135
2024-25	169.3	135
2025-26	217.7	

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**5. Administration & General Cost**

That the OPTCL has projected Administrative and General (A&G) expenditure at Rs. 49.8 Crs for FY 2025-26 against Rs. 37.05 Crs as approved by the Commission to be spent during FY 2024-25.

The summary of Administrative and General Expenses of OPTCL for the last fourteen financial years is furnished below.

**Summary of A&G Cost**

<b>Financial Year</b>	<b>Proposed</b>	<b>Approved</b>
2010-11	26.99	15.14
2011-12	38.34	18
2012-13	39.11	21.25
2013-14	23.09	22.39
2014-15	25.46	24.01
2015-16	32.36	24.37
2016-17	25.58	24.66
2017-18	26.11	25.6
2018-19	27.23	26.44
2019-20	28.07	27.55
2020-21	28.66	28.72
2021-22	38.13	30.35
2022-23	43.18	37.73
2023-24	47.07	40.28
2024-25	51.13	37.05
2025-26	49.8	

The Hon'ble Commission may review the Inspection fee expenses and training expenses. Details of training calendar and its benefits may be checked.

**6. Depreciation Cost**

That the OPTCL has projected depreciation expenditure at Rs. 356.57 Crs for FY 2025-26 against Rs. 275.67 Crs as approved by the Commission to be spent during FY 2024-25.

The summary of Depreciation of OPTCL for the last fourteen financial years is furnished below.

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**Summary of Depreciation Cost**

<b>Financial Year</b>	<b>Proposed</b>	<b>Approved</b>
2010-11	153.31	76.6
2011-12	156.4	79.42
2012-13	155.99	78.57
2013-14	172.85	89.4
2014-15	176.02	92.71
2015-16	197.72	107.48
2016-17	150.5	101.45
2017-18	192.59	130.76
2018-19	217.9	145.43
2019-20	186.03	162.06
2020-21	208.59	195.59
2021-22	276.5	232.95
2022-23	263	233.57
2023-24	293.96	269.54
2024-25	320.03	275.67
2025-26	356.57	

- Norms of tariff regulations and rates as specified in the Transmission Tariff regulations should be considered.
- The depreciation should be determined after due scrutiny.

7. OPTCL has a positive cash flow and hence interest on working capital may not be allowed. Therefore in the truing up exercise also the interest on working capital may not be allowed.

Grant, beneficiary and deposit works assets are being excluded; fully depreciated 90% of Assets value are excluded.

8. OPTCL has projected addition of transmission assets of Rs. 7733.67 Cr. excluding deposit works, grants, during FY 2024-25 and FY 2025-26 and claimed advanced depreciation for the same in its ARR for FY 2025-26. It is proposed that, such claim of advanced depreciation by OPTCL to the tune of Rs. 356.57 Cr. May be rejected. Once, the project is capitalized, then the associated depreciation may be passed in the ARR of subsequent Tariff years.

M/s. Power Tech Consultants  
*[Signature]*  
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9. OPTCL has claimed ROE on projected original book value of transmission fixed assets of Rs. 6127.93 Cr as on 31.03.2024 which is wrong. It should be on actual equity deployed, as on 31.03.2024, hence ROE at the rate of 15.5% is to be paid on equity deployed and not on fixed assets of OPTCL.

**10. Annual Revenue Requirement:**

That the OPTCL has given the proposal for an annual revenue requirement of Rs. 1663.33 Crore for FY 2025-26 against Rs. 913.7 Crore as approved by the Commission to be spent during FY 2024-25.

The summary of ARR of OPTCL for the last fourteen financial years is furnished below.

Financial Year	Proposed	Approved
2011-12	1435.88	579.34
2012-13	1348.46	612.53
2013-14	874.74	597.87
2014-15	988.8	641.3
2015-16	1008.36	630.94
2016-17	975	623.25
2017-18	1013.63	639.4
2018-19	990.65	659.95
2019-20	861.27	706.71
2020-21	966.44	713.84
2021-22	1307.17	792.93
2022-23	1247.14	831.95
2023-24	1102	896.18
2024-25	1380.69	913.7
2025-26	1663.33	

Hence the Annual Revenue Requirement of OPTCL for FY 2025-26 may be approved accordingly through a prudence check and based on the submission made above by the Respondent.

M/s. Power Tech Consultants  
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### 11. Determination of Transmission Charges

OPTCL has given the proposal for transmission charges @ **36.08 P/U** for FY 2025-26 against 24 P/Unit as approved by the Commission during FY 2024-25. The proposed Transmission Tariff of **36.08 P/U** is very high and should not be permitted. This will adversely affect the RST of the DISCOMS and will be a huge burden on the consumers of Odisha.

12. OPTCL has proposed to disallow the rebate on prompt payment to Open Access customers. OPTCL proposed that Long & Medium-Term Open Access Customers other than DISCOMS shall pay the transmission charges within Seven (07) days from the date of receipt of the bill and there is no provision for rebate for early payment in the Open Access Regulations 2020. However, earlier, rebate @ 2% was available for payment within 2 days.

13. The Open Access Regulations, 2020 treat the DISCOMs and other Open Access users like CGP, and Industrial Consumers on the same footing. However, exceptions is being carved out, wherein the DISCOMs need not submit their contracted quantity and are allowed to pay Transmission Charges on the actual energy transacted, whereas the other OA customers like CGPs, Industries are being forced to pay the Transmission Charges on the Contracted Quantity. Further, OPTCL has proposed to do away with the prompt payment rebate for OA customers like CGPs and Industries while allowing the prompt payment rebate benefit to DISCOMs. This type of differential treatment is against the Open Access Regulation, Grid Code, and statutory provision under the Electricity Act 2003. Therefore, it is requested that the Commission to treat all the Transmission Users i.e. CGPs, Industries, and DISCOM on the same footing with provision for charges, and rebates on the same principle without any discrimination.

### 14. Transmission Loss:

OPTCL has proposed transmission loss at 3.05%. In conformity with the power sector reform, OPTCL needs to reduce the transmission loss significantly. We propose to approve transmission loss of OPTCL at 2.5%.

However, in the neighbouring states such as Andhra Pradesh, where almost similar type of network configuration is available, the Electricity Regulatory Commission has considered the lower limit of intra-state transmission loss for the FY 2023-24 at the level of 2.80%. Further, the transmission losses approved by the respective Electricity Regulatory Commissions for other neighbouring states like West Bengal, Madhya Pradesh, Bihar, and Chhattisgarh with similar types of infrastructure are in the range of 2.23% to 3%.

M/s. Power Tech Consultants

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In page 229, OERC Form T-6, OPTCL has considered gross input at 22625.18 MU and gross output 21925.96 MU for the period April-2024 to September 2024. Thus, the total loss for 6 months is 699.23 MU. However, it may be noted that a CGP of capacity 250 MW inject around 25 MU in a financial year to OPTCL grid as inadvertent injection. Now, considering operating capacity of CGP in Odisha at 9850 MW, the estimated inadvertent injection to OPTCL grid will be around 985 MU. Hence, in a period of six months the average inadvertent injection will be 492.5 MU. Thus, the reported transmission loss of OPTCL of 699.23 MU in six months is incorrect and is based on without any third party audit. If we account for the CGP inadvertent injection, then the loss will be around  $699.23 \text{ MU} - 492.5 \text{ MU} = 206.73 \text{ MU}$ . Thus, the OPTCL transmission loss will be around 0.91%. In view of the above submission, it is prayed before the Hon'ble Commission to consider the above and accordingly re-calculate and approve transmission loss.

That OPTCL have not yet identified the areas where loss is maximum and OPTCL need to formulate action plans for loss reduction. OPTCL should inform the methodology adopted to estimate the transmission loss for every year. OPTCL should have undertaken energy audits of lines and substations to know the quantum of transmission loss in the system. Proposing the transmission loss arbitrarily without giving the breakup of the losses in different components of transmission system i.e., lines, substations, power transformers and auto transformers etc are not appropriate for the S.T.U. Thus proposing loss as per the business plan is meaningless. There is enough measure by which OPTCL could reduce the Transmission loss. OPTCL should conduct energy audits and their standard performance should be monitored by a third party auditor appointed by the Commission so as to assess the actual performance of the licensees.

15. That earlier CGPs used to inject inadvertent power to the grid and GRIDCO availed the benefits of inadvertent power. GRIDCO also used to pay the hydro pool cost towards the inadvertent power. However, from FY 2019-20 onwards GRIDCO has stopped making payment towards inadvertent injections. Hence, OPTCL become the ultimate beneficiary of such injection of inadvertent power. We pray to Hon'ble Commission to direct OPTCL to submit the detail list of inadvertent injection for each month by each CGP and consider the same as an additional injection to the grid accordingly calculate the transmission loss. The data of inadvertent injection is available with OPTCL and SLDC for each month for each CGP who are connected to EHT transmission system of OPTCL. The entire stakeholder and consumers of Odisha will be benefitted by such methodology as the intra-state transmission loss will reduce significantly.

16. Each year there is a requirement for conducting 3<sup>rd</sup> Party Energy Audit of the transmission system loss, However OPTCL has not submitted any views on the same. It

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is requested OPTCL may share its views and may conduct 3<sup>rd</sup> Party Energy Audit of its transmission loss by Accredited Energy Auditor.

**17. Open Access Charges:**

In order to have an insights on the loading of existing transmission systems corresponding to the system peak demand of 6927.78 MW as touched in the month of June 2024. Each year Hon'ble OERC informed OPTCL to submit 400 kV, 220 kV, 132 kV Power Transformer and EHT lines loading. OPTCL should make a practice to submit the Power flow data for 400 kV, 220 kV line and 132 kV line and its loading and the entire Auto-transformer loading, Power Transformer and ICT loading along with the ARR application. Moreover by only submitting only power transmitted on the peak demand day will not solve the purpose. In order to ascertain the margin availability, OPTCL may be directed to submit the maximum power handling capability, power flow and % loading of all the 400 kV, 220 kV, 132 kV line and Power Transformer, Auto Transformer, ICT Transformers. It is also desired that OPTCL should conduct load flow analysis to handle around 2000-3000 MW differential load in appropriate manner.

Once these data are made available, it can be ascertained that, there are sufficient margin is available in the transmission network and in order to utilize it fully, STOA should be promoted and the charges for the same may be kept at 1/4 of the MTOA and LTOA charges and necessary amendments in the regulations may be made.

**18. Introduction of Reactive Energy Charges:**

OPTCL has proposed to introduce Reactive Energy Charges of 3 Paise / KVARh which is very high and should be reduced in consultation with various stakeholders.

**19. Levy of Grid Support Charge for connectivity:**

OPTCL has submitted an application to the Hon'ble OERC on 26.06.2024, to determine and approve the imposition of Grid Support Charges for industries with Captive Generating/Cogeneration plants that operate alongside the OPTCL grids.

The case was registered as OERC Case No.-44/2024. In an order dated July 6, 2023, the High Court suggested that if OPTCL wishes to pursue the imposition of Grid Support Charges, they should file a separate application with the OERC. The court emphasized that the OERC, under Section 181 of the Electricity Act, should examine the justifiability of such charges. Hon'ble Commission in order dated 09.07.2024 in case no 44 of 2024 has directed OPTCL to submit a consolidated report considering certain queries. Therefore, the proposal of OPTCL to levy of Grid Support Charge for FY 2025-26 for connectivity may be rejected.

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20. There should not be levy of Grid support charges on CGP as these CGPs are being operated by Industries who are having contract demand with DISCOM. Therefore, levy of GSC will lead double charging the industries and hence OPTCL should abandon the proposal of levy of GSC to the CGPs.

21. Numbers of RE projects are being planned in the state of Odisha, by prospective private developers, CPSU, SPSU. There is a pre-condition in the RE portal of GRIDCO that the prospective developer should obtain NOC from OPTCL for obtaining grid connectivity while submitting the online application. However as per the present practice of OPTCL, unless a project doesn't get approved by any nodal agency, then OPTCL does not conduct the prepaid system study.

In view of the same, it is proposed that OPTCL may prepare monthly status of available transmission lines, substation details, bay availability, transformer capacity availability so that the prospective developers can study and apply to OPTCL for grant of NOC for grid connectivity so that he developer can apply to RE nodal agency accordingly. Further, such NOC can be issued by nodal zonal office without requiring a prepaid system study. The detailed prepaid system study can be conducted after project is approved by Nodal Agency.

22. OPTCL may be directed to submit the status of 765 kV transmission network plan of 2 nos. 765 kV ISTS line i.e. Angul to Gopalpur and Angul to Paradeep and the status of 765 kV substation Kolabira area. OPTCL may share the details of transmission projects of Paradeep-Mahakalapada 765 kV line, 400 kV substation at Joda, Ersama (Paradeep), Neulapoi.

OPTCL may be directed to inform the likely transmission charges and capacity charges so that same can be subjected to prudence check by Hon'ble OERC. In case the capacity charges and transmission charges are addressing the consumer's and state interest, then such capital expenditure plan and tendering process may not approved by Hon'ble OERC and re-tendering by OPTCL under Intra state transmission plan may be initiated fresh.

23. Transmission business being a capital intensive projects requires long term planning. Therefore, Hon'ble OERC may direct OPTCL to submit MYT tariff and long term Business Plan based on which Investment Plan should be provided.

24. In the last tariff hearing OPTCL has submitted at Para 64 of Transmission Plan of Odisha is being revisited and assured to submit before the Commission approval.

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It is requested that OPTCL may clarify, if the 14<sup>th</sup> Intra State Transmission Plan of Odisha has been prepared and submitted before Hon'ble OERC and if yes OPTCL may share a copy of the same. It is prayed that such Transmission Plan, Business Plan, Investment Plan should be approved through public consultation.

25. OPTCL has claimed 0.35 Cr towards annual GCC expenses. OPTCL may please clarify how many nos. of GCC meeting has been conducted in FY 2023-24 and FY 2024-25 and may please share the outcomes of each GCC meetings or may publish the same in its website.

The Respondent understands, perhaps no GCC meeting are being held as specified in chapter-11 (2) (2) of Odisha Grid Code Regulation, 2015.

26. There are around 26 nos. of 132 kV switch station. It is proposed if OPTCL can do a feasibility study and convert these switching stations to 132/33 kV substations by establishing additional bays and 132/33 kV transformers so that future load of DISCOMs can be catered, additionally future RE projects particularly solar can be connected in these grids.

27. It has been seen that Hon'ble OERC raised standard query to OPTCL each year like Loading pattern of existing transmission systems i.e. 400 kV, 220 kV, ICT, Power Transformer, Auto Transformer etc.

OPTCL should make a standard practice to prepare its ARR application and insert these regular features during the ARR application stage considering all relevant query of Hon'ble OERC. This will be quite helpful for the Respondents as well as for the officials of Hon'ble OERC for conducting proper analysis and scrutiny.

28. The Commission should direct OPTCL to take up the matter with the Government of Odisha to fund the economically unviable projects and the other projects that are required for the larger interest of the State through grants.

29. The Commission may direct OPTCL to continuously monitor the operation of transmission system, prevent over loading/under loading wherever possible by taking suitable measures and take up innovative action for optimum loading of the existing network for further reduction of loss.

30. Further, OPTCL has mentioned that some of the substations are operating in under loaded condition because of absence of downstream infrastructure of DISCOMs. The Commission directs OPTCL to take action for a co-ordinated development of intra-state network, ISTS and downstream distribution network. The time frame of execution of transmission system should be discussed with DISCOMs & CTU in order to avoid stranded assets and idle investments.

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31. Therefore, the Commission should direct that no transmission system strengthening proposals should be executed without the prior approval of the Commission. OPTCL should submit the comprehensive system study along with requirements as specified in the licence conditions of OPTCL and tariff regulations for approval of the Commission before proceeding for execution of the project.

32. The Commission therefore should direct OPTCL to take up the matter with Government of Odisha to fund the economically unviable projects and the other projects that are required for the larger interest of the State through grants.

33. OPTCL should be directed to consider the meter data to assess the month-wise transmission loss in intra-state transmission system including losses at different voltage levels (i.e. 132 kV, 220 kV and 400 kV levels).

34. OPTCL should also share the compliance to queries raised by the Hon'ble Commission to all the Objectors.

35. We request the Hon'ble Commission to kindly allow the Respondent to submit any additional submissions, memos, documents etc. as may be required and in general do all such thing as may be required in connection with the above reply.

**PRAYER**

In the facts and circumstances stated above and in the interest of the parties and the larger interest of the State the Hon'ble Commission be pleased to pass appropriate orders to the effect that

1. ARR of OPTCL may be approved accordingly based on the submission made above.
2. The Transmission Charges should be reviewed and reduced substantially.
3. Transmission loss to be reduced considering the submission made for FY 2025-26.
4. Proposal of Reactive energy charges of 3 paise/KVARh should be reduced.
5. Proposal of OPTCL to levy of Grid Support Charge for connectivity may be rejected.
6. Each year truing up exercise and business plan approval should be carried out by Hon'ble commission through a process of public hearing.

Place: Bhubaneswar

For M/s. Power Tech Consultants

M/s. Power Tech Consultants

Date: 15.01.2025

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**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
PLOT NO. 4, CHUNAKOLI, SAILESHREE VIHAR,  
CHANDRASEKHARPUR, BHUBANESWAR-751021**

**CASE NO. 93/2024  
FILING NO. 3**

**IN THE MATTER OF:** (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**And**

(ii) Truing up application for the FY 2023-24 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

**AND**

**IN THE MATTER OF:** Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

**..... Applicant**

**vrs**

**M/s. Power Tech Consultants**, Corporate office at K-8-82, Kalinga Nagar, Ghatikia, Bhubaneswar-751029, Odisha and 15 others. **..... Objectors**

**Rejoinder to the objections raised by the Objector M/s. Power Tech Consultants.**

**The humble applicant above named**

**MOST RESPECTFULLY SHEWETH:**

1. That, the Objector M/s. Power Tech Consultants vide affidavit dated 15.01.2025 has raised certain submissions on ARR & Transmission Tariff Application of OPTCL for



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FY 2025-26 and Truing up application for FY 2023-24. In reply, OPTCL submits its rejoinder to the submissions in the following paragraphs.

**Rejoinder to Para 3 to 10:**

That, the respondent has submitted statistical data of the previous years comparing the proposed vis-à-vis approved in respect of expenses towards human resource expenses, R&M expenses, A&G expenses, depreciation and RoE with a request to approve accordingly after due scrutiny. In this regard, it is pertinent to mention that OPTCL has submitted its ARR application for FY 2025-26 as per the various provisions stipulated in OERC (Terms & Conditions for Determination of Transmission Tariff) Regulations, 2014 and directions of the Commission passed in different orders with proper justifications.

Details of sanctioned strength vis-à-vis actual man in position is furnished as **Annexure-01**.

**Rejoinder to Para 11:**

**Determination of Transmission Charges:**

The Transmission infrastructures are created considering the demand and request of the DISCOMs from time to time, after due approval from the Hon'ble OERC through Transmission Plan. Being a Transmission License, OPTCL has always endeavored to create the Transmission infrastructure for providing reliable and quality power to the consumers of DISCOMs. Accordingly, every year OPTCL is adding more transmission assets to meet the requirement of DISCOMs. Transmission Charge is arrived at 36.08 paise per unit by dividing the total ARR of OPTCL with the recent realistic MU projections of DISCOMs and recovered from them on a monthly basis. This rate will decrease if DISCOMs drawal increase. Alternatively, OPTCL is proposing to recover the Transmission charges on a monthly basis, based on the recent realistic MU projections of DISCOMs, **irrespective of the drawal**.

The proposed Transmission Charge of 36.08 p/u has been derived by considering the recent realistic energy demand projections of 38764.29 MU as communicated by the DISCOMs & other LTOA customers and the ARR figures have been arrived by OPTCL justifying component wise projections as per the provisions contained in OERC Transmission Tariff Regulations, 2014, OPTCL's Audited Accounts for FY 2023-24, all relevant data/information and materials. The details of projections are submitted in page 51-52 of the present ARR application of OPTCL for FY 2025-26. Moreover, OPTCL had furnished all requisite information and details as per the prescribed formats of the Hon'ble Commission with full justifications.



Hence, mere apprehension of the respondent towards imposition of excessive burden on Discoms seems to be inappropriate and unacceptable which is likely to be rejected at this juncture. Moreover, the contention of the stake holder operating in the value chain of electricity needs to appreciate the fact that the cost recovery has to be in full so as to make the sector sustainable.

Hence, OPTCL does not agree with the views of the Objector.

**Rejoinder to Para 12 & 13:**

The Hon'ble Commission vide letter no. DIR (T)-332/2008/77 dated 01.02.2021 has clarified that the DISCOMs do not come under the new regulation "OERC (Terms and conditions of Intra state open access) Regulations 2020" and they are governed under OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014. A copy of the said letter is provided as **Annexure-02**. Further, the details of provision of Rebate have been meticulously mentioned in page no: 79 of our ARR application for FY 2025-26 as per the said OERC Regulations.

**Rejoinder to Para 14 to 16:**

**Transmission Loss**

First of all, the proposal to approve transmission loss of OPTCL at 2.5% is baseless and without any study.

The actual transmission loss for the period **Apr' - Sep' 2024** is calculated to be **3.09%** as shown in the ARR & TT application for FY 2025-26 (page-229). This figure is **less than the actual** transmission loss during last year **i.e. 3.11%** for **FY 2023-24**. In fact, OPTCL had projected Transmission loss of 3.05% for FY 2024-25, but Hon'ble Commission had set a target of 3.00% which could not be achieved yet.

In OPTCL system, the transmission loss is purely technical loss and a function of real time injection of power by a number of generators, system configuration and power flow requirements at different load centers. It depends on many parameters / factors such as distance and mismatch between generation and load centers, types of load, reactive power compensation, voltage profile, seasonal variation of demand load etc. Thus, OPTCL does not have much control over the same at any point of time. The transmission system of OPTCL operates as an integral part of the Eastern Region Grid to serve the internal demand of the State as well as to carry out import and export of power depending upon the system demand.

As of the matter of fact, some grid s/s and lines are being constructed in many remote and deprived areas funded under Central & State Govt. schemes in the interest of public. Additional length in EHT lines and Sub-stations in under-loaded areas are also responsible for increase in transmission loss.



The Transmission Loss in OPTCL network is in a gradually reducing trend over the years i.e. from 3.73% during 2014-15 to 3.11% in 2023-24 and has remained 3.09% within 1<sup>st</sup> six months of FY 2024-25 mainly due to addition of infrastructure and various system strengthening works taken up by OPTCL. The actual losses incurred over the years by OPTCL have been within the margin allowed by Hon'ble Commission up to the year FY 2017-18. However in FY 2018-19, the commission set the loss at 3.00% though the projected transmission loss was at 3.25% and thereafter the commission has been pegging the transmission loss at the same level though loss projected by OPTCL remained in a downward trend.

Year	Tr. Loss proposed	OERC Approva	Actual
2014-15	3.75%	3.75%	3.73%
2015-16	3.75%	3.75%	3.67%
2016-17	3.70%	3.70%	3.58%
2017-18	3.50%	3.50%	3.34%
2018-19	3.25%	3.00%	3.28%
2019-20	3.25%	3.00%	3.25%
2020-21	3.20 %	3.00%	3.22%
2021-22	3.15%	3.00%	3.18%
2022-23	3.10%	3.00%	3.15%
2023-24	3.10%	3.00%	3.11%
2024-25	3.05%	3.00%	3.09% (1 <sup>st</sup> six months )

From the table given above, it is also clear that each year upto FY 2017-18, the transmission loss achieved by OPTCL has remained at a level lower than the approved figures by Hon'ble commission and from FY 2018-19 the target set by OERC appears to be very stiff which was hard to achieve though **the trend of lesser transmission loss year after year has been achieved.**

That the transmission losses depend upon the voltage level at which the power is transmitted. The transmission losses are higher where the percentage of lower voltage (132kV or below) transmission system is higher. A comparison of the average transmission losses of a few state transmission licensees and their corresponding transmission assets at low voltage level (132 kV) is shown below.

**TRANSMISSION LOSS (%) OF OTHER STATES OF LOW VOLTAGE LINES  
UPTO 132KV FOR FY 2023-24**

States	% of Low voltage Lines (up to 132 kV)
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*Prabeer Kumar Mallick*

	Transmission Lines up to 132kV (Ckm)	Total Transmission Lines (Ckm)	% of Transmission Lines up to 132kV	Actual Transmission Losses for FY 2023-24 (%)
Odisha (OPTCL)	8479.831	16508.068	51.36%	3.11
Uttar Pradesh (UPPTCL)	28733	60145	47.77%	3.22
Gujarat (GETCO)	44512	73054	60.93%	3.83

It may be kindly be appreciated that the transmission loss (technical) is bound to happen as per law of physics and is very difficult to reduce after a certain level. Also, at all India level, the transmission loss of utilities have remained at more than 3.00% and to suffice our view point the table is given below for kind appreciation of Hon'ble Commission.

**Transmission loss of Different states for FY 2023-24**

Name of states	Tr. loss approved by State Commission	Actual Tr. loss
Uttar Pradesh (UPPTCL)	3.22%(UERC)	3.22%
Gujarat (GETCO)	3.60% (GERC)	3.83%
Assam (AEGCL)	3.30%(AERC)	3.30%
Rajasthan (RVPN)	4.50%(RERC)	4.23%
Himachal Pradesh (HPPTCL)	3.19% (HERC)	3.25%

All India average transmission loss for the period 06-01-2025 to 12-01-2025 as published by Grid Controller Of India Limited, National Load Despatch Centre dated 18.01.025 is 4.00 %. Further, as per the CEA General Review 2024 (Containing Data for the Year 2022-23) the transmission loss of Eastern Region is 3.37% (attached as **Annexure-03**). Present transmission loss level of OPTCL is much less than both the said cases (i.e. Grid Controller Of India Limited & CEA General Review 2024).

However, as a responsible Transmission utility, OPTCL is making an all-out effort to reduce the transmission loss further by undertaking various **system operation and loss reduction measures** by implementing the emerging technologies like **system Automation**, load bifurcation, **modification in system configuration**, procurement of more efficient equipment, **Digitalization of grids** by using SAS, Protection system



improvement using Busbar protection and Event Logger, **Conversion of Radial to Ring system**, Advanced Metering Infrastructure etc. to bring it to **3.05% by FY 2025-26**.

**Regarding inadvertent power**

OPTCL does not agree to the assumption of the respondent that around 985MU of inadvertent power will be injected in OPTCL system in a year considering the CGP capacity 9850MW. In this regard, it is submitted that during the last six months, it is observed that the total inadvertent power injection is 239.38MU which has been already considered while calculating the Transmission loss of 3.09% in form T-6. Hence, Transmission loss as suggested by the Objector is not just and proper. Details of inadvertent power injected by CGPs in FY 2024-25 till November is attached as **Annexure-04**.

Further, it is submitted that Transmission charge is being computed on Open access transactions based on scheduled energy. Hence, OPTCL does not reap any benefit out of inadvertent power.

**Steps taken for Energy Audit**

Around 2600 nos. of 0.2s Accuracy Class ABT Energy meters are required for different metering points at all Grid Substations of OPTCL for billing and audit purposes. 538 nos. of meters have been installed by OPTCL at different metering points. 2000 nos. energy meters will be installed at different Grid Substations under SAMAST Project, out of which 70 nos. meters have been installed and the installation process of balance meters are in progress. The installation of energy meters for balance metering points under **SAMAST** Project will be completed by 31st October 2025. After installation of the meters, energy audit and calculation of transmission losses of OPTCL on an element-wise at different voltage levels will be feasible.

**Rejoinder to Para 17:**

**Open Access Charges:**

That the system peak demand of 6927.78 was touched on dated 19.10.2024. Statement on the loading pattern of the existing transmission system (400kV, 220kV & 132kV EHT lines along with loading on ICT, Auto & power transformers) corresponding to the peak demand is attached as **Annexure-05**. OPTCL has already conducted load flow study considering different load scenarios i.e. Summer peak, Winter lean, High hydro, Low Hydro & Solar Peak in the Revised 14<sup>th</sup> Intra-state Transmission Plan of Odisha for FY 2022-23 to FY 2026-27, which has been duly approved by Hon'ble Commission vide case no. 08/2024. In the said report, percentage loading of all Transmission lines, ICTs, Auto & Power Transformers till FY 2026-27 have been mentioned. The Transmission infrastructure are being created considering the demand and requests of the DISCOMs



from time to time after due approval from the Hon'ble OERC through Transmission Plan. DISCOMs and other LTOA customers are responsible to bear the full approved ARR of OPTCL. STOA charge is being charged as per the Open Access Regulations, 2020.

**Rejoinder to Para 18:**

**Reactive Energy Charges:**

As per Regulation 31(1) under Chapter-7 (IMBALANCE AND REACTIVE ENERGY CHARGES) of the OERC (Terms and Conditions of Intra-State Open Access) Regulations, 2020, payment for the reactive energy charges by open access consumers shall be in accordance with provisions stipulated in the State Grid Code or as may be specified in relevant regulations/orders of the Hon'ble Commission .

The Hon'ble Commission in Para 16 (page 5) of the order dated 05.02.2019 in Case No. 50/2017 has inter alia viewed that the provisional reactive energy charges of 3 paise/KVARh as allowed in the ARR order of OPTCL for FY 2018-19 continue for time being till a final justification is submitted by OPTCL in consultation with the stakeholders. However, OPTCL **has not realized any revenue** from Reactive Energy Charges so far.

In view of the above, OPTCL proposes that 3paise/KVARh may be approved provisionally as Reactive Energy Charges for FY 2025-26.

Hence, the proposal of objector to reduce the reactive energy charges as suggested by OPTCL is not just and proper.

**Rejoinder to Para 19 & 20:**

**Levy of Grid Support Charge for connectivity:**

The benefits derived by the CGPs with co-located loads are enormous. The benefits are in the nature of ancillary services which are not paid till now. The Grid support charges (GSC)/Parallel operation charge has been levied by different state Regulatory Commissions and upheld by APTEL and Supreme Court of India through various orders and hence proposed by OPTCL through a separate petition. Recently, OPTCL had filed an application (case No. 44 of 2024) on 26.06.2024 for determination and approval for levy of Grid Support Charges for industries having Captive Generating / Cogeneration plants and running in parallel with the Grids of OPTCL. Hon'ble Commission in its order directed OPTCL to submit a consolidated report considering the observations/queries raised by the stakeholders in the earlier Cases filed by OPTCL. In compliance to above, OPTCL is in final stage of preparation of the required consolidated report and will be submitted before Hon'ble Commission shortly.



**Rejoinder to Para 21:**

Necessary system studies are invariably conducted and approvals are granted to RE developers applying for power injection or drawal following the completion of technical and field feasibility assessments.

Further, IT wing of OPTCL is currently developing a web portal i.e. **Odisha Grid Insights (OGri)** portal to publish the key information related to OPTCL EHT Network. This portal will be updated on a monthly basis and will include the following details:

1. Geo-coordinates of all line assets under OPTCL.
2. Present loading data (Minimum & Maximum).
3. Projected load demand within the next 6 months.
4. Transformation capacity.
5. Network status, which will include:
  - a. Spare feeders (equipped or not-equipped)
  - b. Space available for feeder bays
  - c. Possible take-off arrangements (by cable or by overhead)
  - d. Evacuation facilities (radial mode or interconnected mode)
  - e. Load category (percentage of industrial load vs. domestic load)

The portal is currently under development and is scheduled for completion by 07.02.2025. Once live, the portal can be accessed at the following URL: <https://ogri.optcl.co.in>. This initiative will help RE developers to access the OPTCL network for finding potential injection points.

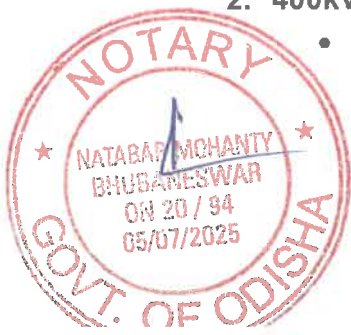
**Rejoinder to Para 22:**

Status of key Transmission projects is furnished below:  
Project under ISTS

1. **765kV Angul – Gopalpur**
  - Scheduled date of completion – December 2027
2. **765kV Angul – Paradeep**
  - Scheduled date of completion – November 2026

Projects under OPTCL

1. **765kV Kolabira**
  - Approved under 21<sup>st</sup> CMETS-ER dated 22.08.2023
  - Land identification is in progress
2. **400kV Joda/Barbil**
  - Approved under 33<sup>rd</sup> CMETS-ER dated 05.08.2024





- Bid process for Transmission Service Provider is under progress by BPC in TBCB mode
3. **400kV Ersama**
- Scheduled date of completion – June 2026
4. **400kV Neulapoi**
- Approved under 30<sup>th</sup> CMETS-ER dated 14.05.2024
  - Tender floated, work order to be placed

There is no provision of Capacity charges in the extant OERC Transmission Tariff Regulations, 2014. In case of 400kV GSS at Joda to be executed under TBCB mode, OPTCL has already approached the Hon'ble Commission about its tariff impact in the ARR. Since Gridco is procuring power through ISTS network, the transmission charges thereof is dealt by Gridco.

**Rejoinder to Para 23 & 24:**

Revised 14<sup>th</sup> Intra-state Transmission plan of Odisha for FY 2022-23 to FY 2026-27 has been approved by Hon'ble Commission vide case no. 08/2024.

**Rejoinder to Para 25:**

GCC meeting could not be held in FY 2023-24. Further, during the FY 2024-25 GCC meeting is taking place. OPTCL has already sought agenda from various stakeholders for 17<sup>th</sup> GCC meeting and the first meeting has been conducted on 17.01.2025. Further, it is planned to conduct three more meetings within March 2025.

**Rejoinder to Para 26:**

OPTCL will take up the proposal of converting Switching Station to Substation based on the demand projection of DISCOMs and the proposal received by RE developers on a case to case basis.

**Rejoinder to Para 27:**

The respondent's suggestion has been noted and OPTCL will include the details of loading pattern in the ARR filing of the coming years. Invariably, OPTCL has been sharing the details of loading pattern of all the ICTs, Auto & Power transformers in L-9 format (OERC approved format) as a part of ARR filing every year.

**Rejoinder to Para 28:**

Since the creation of transmission infrastructure requires huge investments, OPTCL always requests state Government for financial support. State Govt. has been contributing 100% financial assistance in shape of grant/equity in case of non-remunerative and contributing 30% equity support in case of remunerative projects.



**Rejoinder to Para 29 & 30:**

To prevent overloading, regular system study has been carried out and augmented the network capacity as and when required. Priority has been given to use the under loaded network. As directed by Commission, regular meetings are being conducted with DISCOMs for creation and timely completion of downstream infrastructure for optimum utilization of transmission networks. New Transmission elements proposed by OPTCL to strengthen state evacuation are deliberated and approved in the CMETS-ER meeting, held on monthly basis which are further incorporated in National Transmission Network.

**Rejoinder to Para 31:**

OPTCL always executes its projects which are either approved in Business Plan of OPTCL or Intra State Transmission Plan. As per the license conditions, OPTCL is mandated to take prior approval of Hon'ble Commission for any transmission projects above Rs. 10 Cr. which OPTCL has been following scrupulously.

**Rejoinder to Para 32:**

The concern has already been addressed in para 28.

**Rejoinder to Para 34:**

A copy of the Compliance to OERC queries on ARR of OPTCL for FY 2025-26 is hereby furnished as **Annexure-06**.

2. The objections not specifically admitted may be deemed to have been denied.

**PRAYER**

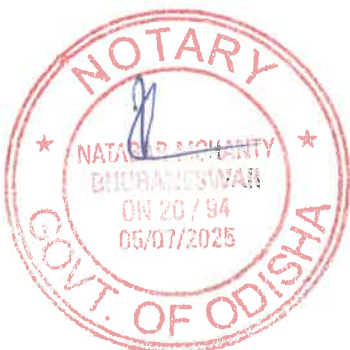
In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of M/s. Power Tech Consultants while approving ARR and Transmission Tariff of OPTCL for FY 2025-26 & Truing up application for the FY 2023-24.

Bhubaneswar  
January 31, 2025

By the Applicant  
Through

*Poojinder Kumar Mathur*

Sr. GM (EI.), RT&C



**GOVERNMENT OF ODISHA  
DEPARTMENT OF ENERGY**

\*\*\*\*\*

No.Estt.OPTCL-02/2013 10919 /En Dated the 20/12/2013

From:-

Sri Srikanta Nayak  
Additional Secretary to Government.

To

The Director (HRD),  
Odisha Power Transmission Corporation Limited,  
Janpath,  
Bhubaneswar-751022

Sub:-Approval of the final report on Organisation Restructuring & Manpower  
Assessment of Odisha Power Transmission Corporation Limited.

Sir,

I am directed to invite a reference to your letter No.21446 dated 31.12.2012 on the subject cited above and to say that, after careful consideration Government have been pleased approve the restructuring proposal of Odisha Power Transmission Corporation Limited with creation of total 432 numbers of posts which includes increase of 471 posts in executive positions and reduction of 39 posts in non-executive category posts in the following manner:-

Designation	Pay Band Existing	Existing Sanctioned Strength	Creation (2013-18)	Strength after re-structuring
<b>A. Executive</b>				
CGM	PB-4	4	5	9
Sr.GM/GM	PB-4	24	12	36
DGM/AGM/Mgr	PB-3	195	281	476
DM/AM	PB-3	957	194	1151
Jr.Mgr & Others	PB-2	395	-21	374
<b>Total (A)</b>		<b>1575</b>	<b>471</b>	<b>2046</b>
<b>B. Non-Executive</b>				
Administrative	PB-1	1053	-572	481
Technical	PB-1/PB-2	2524	900	3424
Others	PB-1	413	-367	46
<b>Total(B)</b>		<b>3990</b>	<b>-39</b>	<b>3951</b>
<b>Total(A+B)</b>		<b>5565</b>	<b>432</b>	<b>5997</b>

II. OPTCL is allowed to fill up the vacancy and posts so created/upgraded during the year 2013-14 to 2017-18, as and when the projects will be taken up or Grids will be commissioned, as per the approved norms sanctioned by the Board of Directors of OPTCL in respect of those units and as per the recruitment plan indicated in the enclosed statement.

- III. The manpower proposed for substation maintenance in 132 KV, 220 KV and 400 KV Grids are to be reduced proportionately in the category of Electrical Engineer and ITI Technicians. The number of O&M circles would not exceeds eight nos. at any given point of time in future.
- IV. The personnel deployed in projects upon its completion will be redeployed/ relocated to other projects site. However, abolition of project circles/divisions/ subdivisions will be subject to the review by the Board of Directors of OPTCL.
- V. Financial expenses for the additional manpower would be allowed by OERC as a pass through expenses towards employees cost of annual revenue requirement in every financial year. The expenditure on this account will be borne by OPTCL without any budgetary support of the State Government.
- VI. The recruitment plan arising out of new creation, retirement and attrition for the period from 2013-18 will be taken up in a staggered manner to ensure planned induction of skilled manpower in Executive and Non-Executive category.
- VII. The proposal for allowing PB-3 to the post of Assistant Manager/Deputy Manager is approved.
- VIII. This has been concurred in by Finance Department in their U.O.R No.128/W.F-II dated 23.08.2013.

Encl:- As above

Yours faithfully,

  
Additional Secretary to Government


Memo No. 10920 /En Dated 20/12/2013

Copy forwarded to Finance Department/Public Enterprises Department/ Chairman, O.E.R.C, Bhubaneswar for information and necessary action.

  
Additional Secretary to Government

Memo No. 10921 /En Dated 20/12/2013

Copy forwarded to P.S to Minister, Energy/ P.S to Chief Secretary/P.S to Commissioner-cum-Secretary to Government, Department of Energy for information and necessary action.

  
Additional Secretary to Government

**Creation of Post(2013-18) Grade & Yearwise**

Position	Existing Sanctioned Strength	Proposed Manpower (2013-14)	Creation/Reduction	Proposed Manpower (2014-15)	Creation/Reduction	Proposed Manpower (2015-16)	Creation/Reduction	Proposed Manpower (2016-17)	Creation/Reduction	Proposed Manpower (2017-18)	Creation/Reduction	Total Creation (2013-18)	Strength after re-structuring
CMD	1	1	0	1		1		1		1		0	1
Director	4	4	0	4		4		4		4		0	4
Chief Vigilance Officer	0	1	1	1		1		1		1		1	1
Sub Total	5	6	1	6		6		6		6		1	1
Electrical													
CGM	2	3	1	3		3		3		3		0	6
GM/Sr.GM	15	24	9	24		25	1	25		25		1	3
Manager/AGM/DGM	120	270	150	286	16	317	31	315	-2	337	22	10	25
AM/DM	749	690	-59	753	63	843	90	848	5	918	70	217	337
Jr.Manager	241	134	-107	141	7	153	12	158	5	171	13	169	918
Sub Total	1127	1121	-6	1207	86	1341	134	1349	8	1454	105	327	1454
Civil													
GM/Sr.G.M	0	1	1	1		1		1		1		0	0
Manager/AGM/DGM	0	3	3	3		3		3		3		1	1
AM/DM	4	11	7	11		11		11		11		3	3
Jr.Manager	24	13	-11	15	2	17	2	18	1	20	2	7	11
Sub Total	28	28	0	30	2	32	2	33	1	35	2	-4	20
F&A													
CGM	1	2	1	2		2		2		2		7	35
GM/Sr.GM	3	3	0	3		3		3		3		0	0
Manager/AGM/DGM	29	33	4	33	0	34	1	34		34		1	2
AM/DM	74	68	-6	71	3	77	6	78	1	82	4	5	3
Jr.Manager	46	65	19	66	1	66	1	66		66		8	34
Sub Total	153	171	18	175	4	182	7	183	1	187	4	34	82
HR													
CGM	1	1	0	1		1		1		1		0	66
GM/Sr.GM	2	3	1	4		3		3		3		0	187
Manager/AGM/DGM	14	20	6	20		20		20		20		0	34
AM/DM	20	37	17	37		37		37		37		6	66
Jr.Manager	23	18	-5	18		18		18		18		17	20
Sub Total												-5	37
													18
													18

Position	Existing Sanctioned Strength	Proposed Manpower (2013-14)	Creation/Reduction	Proposed Manpower (2014-15)	Creation/Reduction	Proposed Manpower (2015-16)	Creation/Reduction	Proposed Manpower (2016-17)	Creation/Reduction	Proposed Manpower (2017-18)	Creation/Reduction	Total Creation (2013-18)	Strength after re-structuring
<b>Sub Total</b>	60	79	19	80	0	79	0	79	0	79	0	19	79
<b>Telecom</b>													
CGM	0	1	1	1		1		1		1		1	1
GM/Sr.G.M	1	2	1	2		2		2		2		1	2
Manager/AGM/DGM	9	41	32	44	3	49	5	50	1	54	4	45	54
AM/DM	70	46	-24	49	3	54	5	55	1	59	4	-11	59
Jr.Manager	38	59	21	65	6	75	10	77	2	85	8	47	85
<b>Sub Total</b>	118	149	31	161	12	181	20	185	4	201	16	83	201
<b>IT</b>													
CGM	0	1	1	1		1		1		1		1	1
GM/Sr.G.M	2	1	-1	1		1		1		1		-1	1
Manager/AGM/DGM	7	10	3	10	3	10		10		10		3	10
AM/DM	18	22	4	22	4	22		22		22		4	22
Jr.Manager	6	6	0	6	0	6		6		6		0	6
<b>Sub Total</b>	33	40	7	40	7	40		40		40		7	40
<b>Industrial Engineering</b>													
AM/DM		1	1	1		1		1		1		1	1
<b>Safety</b>													
CGM(Safety)		1	1	1		1		1		1		1	1
<b>Corporate Affairs</b>													
Company Secretary	1	1	0	1		1		1		1		0	1
Asst.Company Secretary	1	1	0	1		1		1		1		0	1
<b>Sub Total</b>	2	2	0	2		2		2		2		0	2
<b>Corporate Relation</b>													
Manager/AGM/DGM	1	1	0	1		1		1		1		0	1
AM/DM	2	1	-1	1		1		1		1		-1	1
Jr.Manager		1	1	1		1		1		1		1	1
<b>Sub Total</b>	3	3	0	3		3		3		3		0	3
<b>Economist</b>													
Economist	1	1	0	1		1		1		1		0	1
<b>Legal</b>													
Legal			0	0								0	0

*(Handwritten mark)*

Position	Existing Sanctioned Strength	Proposed Manpower (2013-14)	Creation/Reduction	Proposed Manpower (2014-15)	Creation/Reduction	Proposed Manpower (2015-16)	Creation/Reduction	Proposed Manpower (2016-17)	Creation/Reduction	Proposed Manpower (2017-18)	Creation/Reduction	Total Creation (2013-18)	Strength after re-structuring
Manager/AGM/DGM (LAW)	2	4	2	4		4		4		4		2	4
AMDM (LAW)	2	2	0	2		2		2		2		0	2
<b>Sub Total</b>	<b>4</b>	<b>6</b>	<b>2</b>	<b>6</b>		<b>6</b>		<b>6</b>		<b>6</b>		<b>2</b>	<b>6</b>
<b>Medical</b>													
Medical officer / IC	1	1	0	1		1		1		1		0	0
Doctor/Specialist (on deputation)	2	2	0	2		2		2		2		0	2
Asst Medical Officer	1	1	0	1		1		1		1		0	1
<b>Sub Total</b>	<b>4</b>	<b>4</b>	<b>0</b>	<b>4</b>		<b>4</b>		<b>4</b>		<b>4</b>		<b>0</b>	<b>4</b>
<b>Estate</b>													
Land Officer (on deputation)	1	2	1	2		2		2		2		1	2
Forest Officer (retired deputation)	0	1	1	1		1		1		1		1	1
Police Officer (deputation)	0	1	1	1		1		1		1		1	1
<b>Sub Total</b>	<b>1</b>	<b>4</b>	<b>3</b>	<b>4</b>		<b>4</b>		<b>4</b>		<b>4</b>		<b>3</b>	<b>4</b>
<b>Secretarial</b>													
St.P.S	5	5	0	5		5		5		5		0	0
PS/PA	18	17	-1	17		17		17		17		-1	5
<b>Sub Total</b>	<b>23</b>	<b>22</b>	<b>-1</b>	<b>22</b>		<b>22</b>		<b>22</b>		<b>22</b>		<b>-1</b>	<b>17</b>
<b>Others</b>													
Drafting (E2)	1		-1									0	0
AM (SLDC)	1		-1									-1	0
Shipping (E3)	1		-1									-1	0
Executive Asst (E3)	1		-1									-1	0
Environment(E3)	1		-1									-1	0
Civil Policy(E5)	1		-1									-1	0
Contract (E5)	1		-1									-1	0
Corporate Planning (E5)	2		-2									-1	0
Database (E5)	1		-1									-1	0

Position	Existing Sanctioned Strength	Proposed Manpower (2013-14)	Creation/Reduction	Proposed Manpower (2014-15)	Creation/Reduction	Proposed Manpower (2015-16)	Creation/Reduction	Proposed Manpower (2016-17)	Creation/Reduction	Proposed Manpower (2017-18)	Creation/Reduction	Total Creation (2013-18)	Strength after re-structuring
Environment (E6)	2		-2										
Corporate Planning (E7)	1		-1									-2	0
Sub Total	13		-13									-13	0
Total (Executives)	1575	1638	63	1743	104	1905	163	1919	14	2046	127	471	2046
<b>NON EXECUTIVE POSTS</b>													
<b>Administrative posts</b>													
OA - MINISTERIAL (GR-I/II Asst., LD Asst., Diarist, Clerks, Clerk-cum-Comp.Asst.)	651	436	-215	458	22	499	41	499		527	28	-124	527
Accountant / Jr.Accountant	59		-59										
Issue Supdt./ Typist/Comp.Asst	12		-12									-59	0
Steno Gr.I/II/III	70	40	-30	40			1	41				-12	0
Receptionist	4	3(Outsour ced)	3(Outsour ced)	3(Outsour ced)		3(Outsour ced)		3(Outsour ced)		41		-29	41
LAND												0	4
{ Senior Revenue Inspector ,Revenue Inspector ,Asst Revenue Inspector,Amin)	7	12	5	12		12		12		12		5	12
Khansama /Cook	1	0	-1	0		0		0		0		-1	0
Daftary	2	0	-2	0		0		0		0		-2	0
Zamadar	5	0	-5	0		0		0		0		-5	0
Peon	334	0	-334	0		0		0		0		-334	0
Attendant	6	0	-6	0		0		0		0		-6	0
Sweeper	3	0	-3	0		0		0		0		-3	0
Mali	2	0	-2	0		0		0		0		-2	0



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Position	Existing Sanctioned Strength	Proposed Manpower (2013-14)	Creation/Reduction	Proposed Manpower (2014-15)	Creation/Reduction	Proposed Manpower (2015-16)	Creation/Reduction	Proposed Manpower (2016-17)	Creation/Reduction	Proposed Manpower (2017-18)	Creation/Reduction	Total Creation (2013-18)	Strength after re-structuring
Sub Total Administrative	1156	488	-664	510	22	552	42	552	0	580	28	-572	584
<b>TECHNICAL CATEGORY(Non Executive)</b>													
IT Asst	1	1	0	1		1		1		1		0	0
Instructor	3	4	1	4		4		4		4		0	1
Telephone Operator	5	Outsource	-5	3(Outsourced)		3(Outsourced)		3(Outsourced)		3(Outsourced)		1	4
<b>Sub Total</b>	<b>9</b>	<b>5</b>	<b>-4</b>	<b>5</b>	<b>0</b>	<b>5</b>	<b>0</b>	<b>5</b>	<b>0</b>	<b>5</b>	<b>0</b>	<b>-5</b>	<b>0</b>
<b>Electrical Foreman /</b>			<b>0</b>									<b>-4</b>	<b>5</b>
Sr.Chargeman(EI)	124	82	-42	86	4	93	7	97	4	106	9	-18	106
Electrician A/B/C	163	186	23	214	28	245	31	253	8	277	24	114	277
LinemanA/B/C	449	532	83	582	50	638	56	664	26	724	60	275	724
Operator A/B/C	396	440	44	508	68	568	60	588	20	644	56	248	644
Helper (Unskilled/Semi Skilled)(SSA-EI)	1104	1022	-82	1118	96	1241	123	1267	26	1375	108	271	1375
<b>Sub Total</b>	<b>2236</b>	<b>2262</b>	<b>26</b>	<b>2508</b>	<b>246</b>	<b>2785</b>	<b>277</b>	<b>2869</b>	<b>84</b>	<b>3126</b>	<b>257</b>	<b>890</b>	<b>3126</b>
<b>Telecom</b>													
Foreman / Sr.Chargeman(TC)	5	12	7	15	3	20	5	21	1	25	4	20	25
Technician A/B/C (Telecom)	130	57	-73	63	6	73	10	75	2	83	8	-47	83
Helper (Unskilled/Semi Skilled)(SSA-TC)	85	87	2	96	9	111	15	114	3	126	12	41	126
<b>Sub Total</b>	<b>220</b>	<b>156</b>	<b>-64</b>	<b>174</b>	<b>18</b>	<b>204</b>	<b>30</b>	<b>210</b>	<b>6</b>	<b>234</b>	<b>24</b>	<b>14</b>	<b>234</b>
<b>Medical</b>													
Medical Technician	1	1		1		1		1		1		0	0
Pharmacist	1	1		1		1		1		1		0	1
Dresser	1	2	1	2		2		2		2		1	2
Nurse	0	1	1	1		1		1		1		1	1
Medical Attendant	0	1	1	1		1		1		1		1	1

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Position	Existing Sanctioned Strength	Proposed Manpower (2013-14)	Creation/Reduction	Proposed Manpower (2014-15)	Creation/Reduction	Proposed Manpower (2015-16)	Creation/Reduction	Proposed Manpower (2016-17)	Creation/Reduction	Proposed Manpower (2017-18)	Creation/Reduction	Total Creation (2013-18)	Strength after re-structuring
<b>Sub Total</b>	<b>3</b>	<b>6</b>	<b>3</b>	<b>6</b>	<b>0</b>	<b>6</b>	<b>0</b>	<b>6</b>	<b>0</b>	<b>6</b>	<b>0</b>	<b>3</b>	<b>6</b>
Driver	248		-248										
Draftsman	52		-52									-248	0
Drawing Supdt.	1		-1									-52	0
Cad Operator	5		-5									-1	0
<b>Sub -Total</b>	<b>306</b>		<b>-306</b>									<b>-5</b>	<b>0</b>
<b>Sub Total (Technical)</b>	<b>2774</b>	<b>2429</b>	<b>-345</b>	<b>2693</b>	<b>264</b>	<b>3000</b>	<b>307</b>	<b>3090</b>	<b>90</b>	<b>3371</b>	<b>281</b>	<b>597</b>	<b>3371</b>
Civil			0										
Work Sarkar	15		-15									0	0
Carpenter	14		-14									-15	0
Plumber B/C	14		-14									-14	0
Pump Operator	3		-3									-14	0
Others	14		-14									-3	0
Sub-Total	60	0	-60	0		0		0		0		-14	0
<b>TOTA ( Non Executive)</b>	<b>3990</b>	<b>2917</b>	<b>-1073</b>	<b>3203</b>	<b>286</b>	<b>3552</b>	<b>349</b>	<b>3642</b>	<b>90</b>	<b>3951</b>	<b>309</b>	<b>-60</b>	<b>0</b>
<b>TOTAL (Executive+ Non Executive)</b>	<b>5565</b>	<b>4555</b>	<b>-1010</b>	<b>4946</b>	<b>390</b>	<b>5457</b>	<b>512</b>	<b>5561</b>	<b>104</b>	<b>5997</b>	<b>436</b>	<b>-39</b>	<b>3951</b>
												<b>432</b>	<b>5997</b>

OPTCL SS MIP VAC DATA AS ON 29.01.2025 (EXECUTIVES)				
POSTS	S/S (Govt. approved)	MIP	VACANCY	
ELECTRICAL	1454	1023	431	
TELECOM	201	69	132	
CIVIL	35	22	13	
IT	40	25	15	
FIN	187	145	42	
HRD	80	40	40	
CORPORATE AFFAIRS	2	2	0	
ECONOMIST	1	0	1	
ESTATE*	4	0	4	
HOSPITAL*	4	0	4	
SECRETARIAL	22	6	16	
LEGAL	6	4	2	
MECH	0	1	-1	
CR	3	1	2	
CMD	1	1	0	
DIR (OP)	1	1	0	
DIR (PROJ)	1	0	1	
DIR (FIN)	1	0	1	
DIR (HRD)	1	1	0	
DIR(SLDC)	1**	1	0	
CGM (SAFETY)	1	1	0	
CVO	1	0	1	
<b>TOTAL</b>	<b>2047</b>	<b>1343</b>	<b>704</b>	

\* Post sanctioned for deputation from Govt. of Odisha  
 \*\* The post of Dir (SLDC) is sanctioned in Govt. approved structure of SLDC

OPTCL SS MIP VAC DATA AS ON 29.01.2025 (NON-EXECUTIVES)				
SL.NO.	POSITION	S/S (Govt. approved)	MIP	VACANCY
<b>A</b>	<b>ADMINISTRATIVE CATEGORY</b>			
A.1	OFFICE ASSISTANT	527	185	342
A.2	STENOGRAPHER	41	6	35
A.3	LAND (SENIOR REVENUE INSPECTOR, REVENUE INSPECTOR, ASSISTANT REVENUE INSPECTOR, AMIN)	12	0	12
<b>B</b>	<b>TECHNICAL CATEGORY</b>			
B.1	IT ASSISTANT	1	0	1
B.2	INSTRUCTOR	4	0	4
B.3	ELECTRICAL	3126	998	2128
B.4	TELECOM	234	72	162
B.5	MEDICAL	6	2	4
<b>C</b>	<b>OTHERS (EX-CADRE)***</b>	<b>0</b>	<b>105</b>	<b>-105</b>
	<b>GRAND TOTAL</b>	<b>3951</b>	<b>1368</b>	<b>2583</b>

\*\*\* The Ex-Cadre category will continue till the retirement of the existing employees.

ODISHA ELECTRICITY REGULATORY COMMISSION  
BIDYUT NIYAMAK BHAWAN  
PLOT NO.4, CHUNOKOLI, SHAILASHREE VIHAR,  
BHUBANESWAR - 751021  
TEL. No. 2721048, 2721049, FAX: 2721053/2721057  
E-mail: orierc@gmail.com  
Website: www.orierc.org  
\*\*\*\*\*

No. DIR (T)-332/2008/177-  
Dt. 01.01.2021

To  
The Managing Director,  
OPTCL,  
Janpath, Bhubaneswar-22.

**Sub: Billing procedure consequent upon implementation of new Open Access Regulations, 2020.**

**Ref: Your letter No. RT&C-47/2020/18(3) dt.08.01.2021.**

Sir,

In inviting a reference to the subject mentioned above, it is to intimate you that transmission tariff of OPTCL is governed under OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 which is still in force.

Regulation 6.5 of Transmission Tariff Regulation, 2014 states as follows:

*"Transmission Tariff: The Transmission Tariff payable by the Beneficiaries of the Transmission System shall be designed to recover the Aggregate Revenue Requirement approved by the Commission for each year of the Control Period."*

Regulation 2.1(h) of the same Regulation states that a distribution licensee shall necessarily be a long term transmission customer for which it shall be required to enter into a transmission service agreement with the transmission licensee.

Aggregate Revenue Requirement of the transmission licensee is recovered from the beneficiaries DISCOMs who are long term open access customer. The Commission carryout true up exercise under the same Regulation basing on the actual expenses booked in the audited books of the account of the transmission licensee for the year and expenses allowed in the ARR for the corresponding financial year. Therefore, the approved ARR of the transmission licensee is well taken care of for any short fall on this account. The STU has entered into transmission service agreement with the DISCOMs accordingly.

o/c

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The Open Access Regulation, 2020 stipulates that the open access customer who wishes to avail open access under that Regulation shall have to apply for the same. DISCOMs do not come under the same and are governed under Transmission Tariff Regulation, 2014 and consequential special transmission service agreement. The long term customer other than the DISCOMs shall come under OERC Open Access Regulation, 2020.

Therefore, you are required to follow OERC Transmission Tariff Regulation, 2014 scrupulously as long as it is in force.

Yours faithfully,

  
SECRETARY 1.2.2021

**Table 6.2**  
**Regional Transmission Losses**  
**Utilities**  
**2022-23**

Region	Energy Available in the Region (GWh)	Export to other Region (GWh)	Export to Nepal (GWh)	Export to Bangladesh (GWh)	Export to Bhutan (GWh)	Export to Myanmar (GWh)	Total Energy drawal by States/Utilities (GWh)	Transmission Losses (GWh)	Transmission Losses (%)
1	2	3	4	5	6	7	8	9 (2-3-4-5-6-7)	10((8/2)x100)
Northern Region	235784.74	3399.70	343.64	0.00	0.00	0.00	224171.69	7869.71	3.34
Western Region	282367.53	57344.05	0.00	741.34	0.00	0.00	215219.30	9062.84	3.21
Southern Region	173393.55	7625.46	0.00	3491.13	0.00	0.00	156314.82	5962.13	3.44
Eastern Region	134352.68	57191.16	314.03	7547.70	266.30	0.00	64506.41	4527.08	3.37
North Eastern Region	21117.54	4662.00	0.00	1039.50	38.47	9.81	14499.49	868.27	4.11

STATEMENT OF FREE POWER OF CGPS FOR FY 2024-25

SL. No.	CGP Stations	STATEMENT OF FREE POWER OF CGPS FOR FY 2024-25												TOTAL Injected (In Kwh)
		APRIL'24 Injected (In Kwh)	MAY'24 Injected (In Kwh)	JUN'24 Injected (In Kwh)	JULY'24 Injected (In Kwh)	AUG'24 Injected (In Kwh)	SEPT'24 Injected (In Kwh)	OCT'24 Injected (In Kwh)	NOV'24 Injected (In Kwh)	TOTAL				
1	IMFA	9,64,093	8,71,590	9,66,013	6,90,482	6,60,805	8,44,052	11,81,938	8,61,089	70,40,062				
2	NALCO	10,68,227	11,48,265	82,715	3,79,525	1,19,400	2,91,407	7,95,571	3,54,861	42,39,971				
3	ARATI STEELS	8,62,606	9,17,113	7,95,889	8,37,134	9,54,267	7,77,542	12,32,834	4,38,520	68,15,905				
4	Aryan Ispat Ltd.	1,89,004	75,496	94,374	1,28,766	75,923	1,18,270	1,13,984	93,094	8,88,911				
5	BPSL	55,93,922	73,91,485	59,86,547	47,02,977	55,65,774	84,85,797	73,22,641	56,03,633	5,06,52,776				
6	TATA BSL(BSL)	1,04,87,992	80,79,802	1,02,02,963	1,00,97,489	59,31,643	69,64,899	1,07,69,509	78,60,310	7,03,94,607				
7	DINABANDHU	-	-	28,262	5,86,618	7,74,738	6,15,824	3,96,009	4,16,635	28,18,086				
8	HINDALCO	12,76,300	13,30,670	13,48,750	14,65,620	15,47,850	13,96,940	14,27,620	15,00,550	1,12,94,300				
9	IFFCO	730	210	480	1,990	31,380	55,630	4,700	140	95,260				
10	JSL	10,68,260	10,39,500	12,65,930	8,91,100	7,64,870	7,70,640	9,64,040	11,83,350	79,47,690				
11	JSPL	37,70,844	28,08,670	34,11,545	54,03,917	9,81,356	23,35,330	40,58,051	83,47,885	3,11,17,598				
12	BPPL	1,30,416	1,35,928	1,54,348	2,60,512	3,73,954	8,90,365	2,25,416	1,78,372	23,49,311				
14	MAITHAN	14,48,004	9,09,222	4,00,413	6,89,208	10,57,109	9,66,770	10,59,627	7,65,805	72,90,158				
15	NARBHERAM	2,01,659	58,238	1,03,200	-	56,914	2,25,360	1,47,510	2,39,699	10,32,580				
16	NINL	5,028	31	26,323	96,865	5,696	95,165	11,240	3,849	2,44,197				
17	MGM	1,82,571	1,45,479	2,35,893	2,52,226	2,21,855	2,06,940	3,12,429	2,19,178	17,76,571				
18	NAVA LTD.	4,20,921	4,75,773	6,19,574	5,53,073	7,28,331	5,59,808	4,39,361	5,28,169	43,25,010				
21	DALMIA CEMENT (OCL)	2,99,204	3,75,083	2,94,627	3,14,046	1,72,849	3,16,147	2,67,925	2,33,407	22,73,288				
22	Debtor (Dalmia Kapilas)	66,891	69,910	60,865	80,334	1,19,485	1,63,380	86,986	65,883	7,13,734				
23	PATNAIK STEEL	2	1	1	-	14	-	460	5	483				
24	RSP	3,45,754	1,88,727	1,65,840	8,04,091	1,12,952	4,43,299	5,56,802	3,34,735	29,52,200				
25	MSP METALICS	1,59,426	-	75,880	1,66,416	1,11,304	1,39,010	1,22,197	1,67,099	9,41,332				
26	SHYAM METALICS	1,38,910	2,80,040	74,430	1,94,760	1,21,420	1,68,600	38,210	1,57,180	11,73,550				
27	TATA SPONGE	2,29,645	2,60,280	1,46,805	2,05,081	3,30,178	4,44,025	2,84,981	3,81,790	22,82,785				
28	VAL JHARSUGUDA	2,30,917	3,43,139	2,62,600	2,42,700	2,30,926	4,54,063	5,40,147	3,10,124	26,14,616				
29	VAL LANJIGARH	2,75,100	4,13,880	6,10,070	7,13,440	6,33,460	7,86,250	8,79,780	6,37,430	49,49,410				
30	VISA	7,71,061	10,05,163	9,47,300	2,69,420	30,61,941	12,17,292	14,18,462	12,09,048	96,30,267				
31	OSISL	7,65,935	4,69,738	3,29,024	3,70,361	5,23,439	3,70,361	5,48,210	3,71,584	36,47,711				
34	SHREE GANESH	1,00,210	1,55,053	2,54,522	3,41,391	4,46,352	4,17,582	4,09,942	10,46,114	31,71,166				
35	FACOR	2,65,677	5,50,814	7,41,583	8,52,098	6,34,255	7,53,202	8,37,072	7,47,334	53,82,035				
36	ADITYA LAPANGA	6,78,480	8,25,910	8,25,390	7,56,250	8,02,740	7,21,920	8,59,310	7,69,820	62,39,820				
37	Arcelor Mittal Nippon Steel	4,772	90,245	99,500	1,11,325	65,628	29,951	55,182	58,708	5,15,311				
38	BEL	2,10,320	2,69,476	2,62,673	2,75,829	1,95,838	1,95,433	2,25,838	1,87,062	18,75,699				
40	Viral steel	6,27,076	8,81,557	8,63,335	7,99,979	7,99,391	62,967	5,69,458	5,82,286	54,92,049				
41	RUNGTA MINES DSP	30,64,885	34,10,700	31,31,957	33,01,927	26,70,196	33,64,501	33,82,666	27,08,923	2,50,35,755				
42	Runga mines(Badbil)	5,57,936	6,40,070	5,87,227	3,86,202	2,21,501	4,01,154	3,09,846	4,97,457	36,01,393				
43	Runga mines(Kamanda steel ltd.)	12,15,441	1,23,304	1,604	16,842	2,98,357	3,89,125	44,787	18,658	21,08,118				
44	SMC JHARSUGUDA	4,28,253	5,30,964	5,22,235	5,29,910	4,25,823	4,82,690	6,53,975	2,05,400	37,79,250				
45	SMC BADMAL	2,11,681	1,87,531	4,95,099	4,79,752	4,68,993	4,71,241	4,18,625	1,30,510	28,63,432				
46	ABREL	35,599	53,714	33,667	42,270	38,116	38,364	35,739	27,841	3,05,310				
47	KJS ALUWALIA	2,42,458	-	26,81,937	8,05,113	10,75,172	3,71,659	6,54,355	11,680	58,42,374				

48	SHREE CEMENT	43,307	77,658	1,48,698	1,72,642	2,11,054	2,05,650	1,46,729	93,075	10,88,813
49	JAGANNATH POWER	4,31,538	6,59,109	7,10,884	8,95,731	9,60,536	4,04,745	6,09,344	7,82,263	54,54,150
50	ABREL KHA-JURIAKATA	7,74,171	55,849	45,539	74,081	72,652	56,116	50,496	44,857	11,73,761
51	THAKUR PRASAD					7,00,673	1	5	1	7,00,680
53	ADHUNIK METALICS								5,93,528	5,93,528
54	OCL								5,70,453	5,70,453
	TOTAL CGP	3,98,45,226	3,73,05,387	4,00,96,511	4,01,69,132	3,54,10,340	3,84,69,467	4,44,70,009	4,15,39,394	31,73,05,466
	TOTAL (MU)	39.85	37.31	40.10	40.17	35.41	38.47	44.47	41.54	317.31



**Loading pattern corresponding to the peak demand of 6928 MW  
(including Vedanta drawal) on 19-JUNE-2024 AT 16:00 hrs**

FEEDER NAME	MW	Rated Capacity in MW	% Loading
400KV MENDHASAL - PANDIAVAL2	50.43		
400KV MERAMUNDALI-BOL_PG	0.00		
400KV MERAMUNDALI-KANIHA1	-637.76		
400KV MERAMUNDALI-KANIHA2	-385.39		
400KV INDRAVATI ICT1	-67.47		
400KV INDRAVATI ICT2	-66.91		
400KV MERAMUNDALI-BOL_PG	0.00		
400KV DUBNW- KALABADIA	-368.96		
400KV_OPGC-JHARS_PG - 1	230.36		
400KV_OPGC-JHARS_PG - 2	150.50		
MENDHASAL -PANDIAVIL 1	49.34		
DUBNW- PANDIAVAL	75.67		
VEDANTA-JHARSUGUDA1 PG	-40.51		
VEDANTA-JHARSUGUDA2 PG	-40.23		
220KV JODA-JAMSHEDPUR	5.54	192	3%
220KV JODA-RAMCHANDRAPUR	-156.72	192	86%
KATAPALLI2-BOLAN PG	0.00	192	0%
SADEIPALLI2-BOLAN PG	-127.65	192	70%
220KV RENGALI-RENGALI PG 1	24.96	192	14%
220KV RENGALI-RENGALI PG 2	9.33	192	5%
220KV RENGALI-KANIHA	-132.61	192	73%
220KV TTPS-KANIHA	136.08	192	75%
220KV MERAMUNDALI-KANIHA 1	-107.71	192	59%
220KV MERAMUNDALI-KANIHA 2	-103.58	192	57%
220KV JAYANAGAR-JEPORE PG 1	-22.71	192	12%
220KV JAYANAGAR-JEPORE PG 2	-23.86	192	13%
220KV BUDHIPADAR-KORBA 1	-4.14	192	2%
220KV BUDHIPADAR-KORBA 2	-2.92	192	2%
220KV BUDHIPADAR-KORBA 3		192	0%
220KV TARKERA-BISRA 1	-201.68	350	61%
220KV TARKERA-BISRA 2	-205.17	350	62%
132KV KALABADIA-BANGIRIPOSI	62.92	76	87%
132KV KALABADIA-BARIPADA	66.95	76	93%
220KV KALABADIA-BALASORE 1	176.81	192	97%
220KV KALABADIA-BALASORE 2	177.28	192	97%
NET - KALABADIA DRAWL	-916.91		
ATRI_AUTO-1	98.39	160	65%
ATRI_AUTO-2	98.61	160	65%
BALAS AUTO1	-77.17	160	51%
BALAS AUTO2	-76.75	160	50%
BALAS_AUTO-3	-76.34	160	50%
BHADR AUTO1	0.00	100	0%
BHADR AUTO2	91.01	160	60%
BHADR_AUTO-3	91.84	160	60%

BHANJ AUTO1	53.54	160	35%
BHANJ AUTO2	47.17	160	31%
BIDAN AUTO1	-54.85	100	58%
BIDAN AUTO2	0.00	100	0%
BIDAN AUTO3	23.75	160	16%
BOLNW AUTO1	67.28	160	44%
BOLNW AUTO2	70.89	160	47%
BOLNW_AUTO-3	66.65	160	44%
BUDHI AUTO1	92.49	160	61%
BUDHI AUTO2	52.98	160	35%
BURLA AUTO1	35.41	100	37%
BURLA AUTO2	35.34	100	37%
BURLA_AUTO-3	53.04	160	35%
CHAND AUTO1	56.32	100	59%
CHAND AUTO2	97.51	160	64%
CHAND AUTO3	60.82	100	64%
CHAND AUTO4	94.03	160	62%
DUBURI AUTO1	58.66	160	39%
DUBURI AUTO2	56.70	160	37%
DUBURI AUTO3	37.08	100	39%
GODA_AUTO-1	30.13	160	20%
GODA_AUTO-2	30.47	160	20%
JAYAN AUTO1	47.72	160	31%
JAYAN AUTO2	40.76	160	27%
JODA AUTO1	64.76	160	43%
JODA AUTO2	65.89	160	43%
JODA AUTO3	53.73	100	57%
LAPAN_AUTO-1	81.15	160	53%
LAPAN_AUTO-2	81.07	160	53%
MERAM AUTO1	39.55	100	42%
MERAM AUTO2	38.57	100	41%
MERAM AUTO3	37.43	100	39%
NAREN AUTO1	0.00	160	0%
NAREN AUTO2	0.00	160	0%
NAREN AUTO3	0.00	100	0%
PARAD AUTO1	-46.12	100	49%
NAYAG POWXFMR1	22.55		
NAYAG POWXFMR2	13.44		
NAYAG POWXFMR3	-22.16		
TATAPOWER1	-4.60		
TATAPOWER2	-2.02		
VAL DRAWAL	-959.45		
VEDANTA IPP	499.41	600	88%
ATRI-PANDIAVIL-1	-107.98	192	59%
BHOGRAI-KUCHEI	-29.34	76	41%
JALESWAR-KUCHEI	-40.58	76	56%
ADITYA_LOAD	0.00		
INFA-THERU	37.25	76	52%
ATRI-PANDIAVIL-2	-108.85	192	60%
220KV_KJHAR_GR -KEONJ_PG - 1	-11.58		

220KV_KJHAR_GR-KEONJ_PG - 2	-11.75		
LAXMIPUR_POWER TRANSFORMER	2.97	20	16%
PARAD AUTO2	-74.20	160	49%
PARAD AUTO3	-67.87	160	45%
TARKE AUTO1	50.91	100	54%
TARKE AUTO2	52.13	100	55%
TARKE AUTO3	51.04	100	54%
TARKE AUTO4	0.00	100	0%
THERU AUTO1	-22.22	100	23%
THERU AUTO2	21.45	100	23%
TTPS AUTO1	411.78		
TTPS AUTO2	0.00		
BOLNW_BOLAN_PG-2	-127.65	192	70%
132 KV ANAND_BAITARANI PWR	-0.03		
220 KV_NAREN_TATA GOPALPUR FDR-1	0.00	192	0%
220 KV_NAREN_TATA GOPALPUR FDR-1	3.32	192	2%
220 KV_JAYAN_JEYPO FDR-3	-20.90	192	11%
220 KV_JAYAN_JEYPO FDR-4	-23.87	192	13%
KESINGA - BOLANGIR PG	-60.98	192	33%
PRATAPSASAN-PANDIAVIL - 1	-111.61	192	61%
PRATAPSASAN-PANDIAVIL - 2	-111.83	192	61%
220 BUDHIPADAR - SMC 1	-13.22	192	7%
132 LAPAN - SMC	21.64	76	30%
132KV JODA-KENDUPOSI	22.42	76	31%

Case No: 93/2024

Filing No: 1

**IN THE MATTER OF:**

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**AND**

**IN THE MATTER OF:**

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022

... Applicant

**AND**

M/s. Neelachal Ispat Nigam Limited, Neelachal House, Kalinganagar Industrial Complex, Duburi, Dist-Jajpur, PIN-755026

...Respondent

**Affidavit verifying the application**

I, Shri Kundan Prasad, Son of Sri Jogendra Prasad aged about 45 years, working as Head Electrical Maintenance with M/s. Neelachal Ispat Nigam Limited, Neelachal House, Kalinganagar Industrial Complex, Duburi, Jajpur-755026 do hereby solemnly affirm and state as follows: -

1. That I am the Head Electrical Maintenance of M/s. Neelachal Ispat Nigam Limited and I am duly authorized to swear this affidavit on its behalf.
2. The statements made in the petition are based on information and I believe them to be true.


PLACE: Bhubaneswar

DATE: 16.01.2025



DEPONENT

The deponent above named being duly identified by Sri.....  
The Advocate appears before me on 16.01.2025 at about 11:00 A.M. J.P.N. and states on oath that the contents of this affidavit are true to the best of his/her knowledge

  
NOTARY  
GOVT. OF ODISHA  
JAJPUR ROAD  
26, J.P.N.  
129

Kundan Prasad  
Head, Electrical Maintenance  
Neelachal Ispat Nigam Limited  
Duburi, Jajpur, Odisha

**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur  
Bhubaneswar-751021**

**Case No: 93/2024  
Filing No: 1**

**IN THE MATTER OF:**

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**AND**

**IN THE MATTER OF:**

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022

**... Applicant**

**AND**

M/s. Neelachal Ispat Nigam Limited, Neelachal House, Kalinganagar Industrial Complex, Duburi, Dist-Jajpur, PIN-755026

**...Respondent**

**Letter of Authorization**

I, Shri Kundan Prasad, Son of Sri Jogendra Prasad aged about 45 years, working as Head Electrical Maintenance with M/s. Neelachal Ispat Nigam Limited, Neelachal House, Kalinganagar Industrial Complex, Duburi, Jajpur-755026 hereby authorize Sri Bibhu Swain, residing at K-8-82, Kalinga Nagar, Ghatikia, Bhubaneswar-751029 to be my representative to present the above case on my behalf before the Hon'ble Odisha Electricity Regulatory Commission relating to my above reply and to submit any additional submission, memos, documents etc. as may be required and in general do all such thing as may be required in connection with the above reply.

**Place: Bhubaneswar**

**For M/s. Neelachal Ispat Nigam Limited**

**Date: 16.01.2025**

**Authorized Signatory**

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**Kundan Prasad  
Head, Electrical Maintenance  
Neelachal Ispat Nigam Limited  
Duburi, Jajpur, Odisha**

**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharapur  
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**AND**

**IN THE MATTER OF:**

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022.

**... Applicant**

**AND**

**IN THE MATTER OF:**

M/s. Neelachal Ispat Nigam Limited, Neelachal House, Kalinganagar Industrial Complex, Duburi, Dist-Jajpur, PIN-755026

**...Respondent**

**The humble respondent above named most respectfully submit as under:**

1. That M/s. Neelachal Ispat Nigam Limited (hereinafter referred as "NINL" / "Respondent") is a company incorporated under the provisions of the Indian Companies Act, 1956/2013, as applicable, having its Registered Office at Samabaya Bhawan, 4th Floor, Unit 9, Janpath, Bhubaneswar, Odisha-751022 and Plant address at Neelachal House, Kalinga Nagar, Industrial Complex, Duburi, Jajpur, Odisha-755026 hereinafter referred as "NINL" / "Respondent".
2. NINL is submitting the following points on the application of OPTCL for determination of Annual Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 for kind review and necessary action by the Hon'ble Commission.
3. **Human Resources Expenses:**

The OPTCL has projected Employee Cost expenditure at Rs. 554.05 Crore for FY 2025-26 against Rs. 488.63 Crore as approved by the Commission to be spent during FY 2024-

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**Kundan Prasad**  
Head, Electrical Maintenance  
Neelachal Ispat Nigam Limited  
Duburi, Jajpur, Odisha

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25. The summary of Employee Expenses of OPTCL for the last fourteen financial years is furnished below.

**Summary of Employee Expenses**

Financial Year	Proposed	Approved	Actual
2010-11	865.13	279.56	173.11
2011-12	952.06	338.14	279.56
2012-13	655.36	318.48	268.59
2013-14	341.2	289.3	191.70
2014-15	361.38	318.18	309.59
2015-16	310.02	305.23	285.95
2016-17	399.56	292.55	382.44
2017-18	462.33	304.5	380.32
2018-19	419.57	360.4	375.65
2019-20	421.99	419.77	394
2020-21	466.22	415.87	373.19
2021-22	532.73	457.88	474.83
2022-23	526.53	477.19	
2023-24	508.76	449.08	
2024-25	582.06	488.63	
2025-26	554.05		

The cost break-up of the employee expense is provided below:

Sl. No	Particulars	Prev. Year 2023-24	Curr. Year 2024-25	Ensuring Year 2025-26
<b>A</b>	<b>Salary &amp; Allowance</b>	1	2	3
1	Basic Pay	156.70	156.69	160.16
2	Dearness Allowance	69.32	89.75	97.70
3	House Rent Allowance	23.18	25.07	25.87
4	Medical Allowances	7.51	8.71	8.41
5	Conveyance Expenses (allowance+Reimbursement)	2.84	3.42	3.88
6	Other Allowance	1.28	1.53	1.96
7	Bonus	0.01	0.01	0.01
8	Stipend for New Recruitment	8.49	10.00	10.53
9	Stipend to Apprentice	1.64	3.00	2.74
10	Arrear Salary for Wage Board Revision	-	6.65	-

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Kundan Prasad  
Head, Electrical Maintenance  
Neelachal Ispat Nigam Limited  
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	<b>Sub-total (A)</b>	<b>270.97</b>	<b>304.83</b>	<b>311.27</b>
<b>B</b>	<b>Additional Employee Cost</b>			
1	Out Sources Engagement	3.46	5.58	6.81
	<b>Sub-total (B)</b>	<b>3.46</b>	<b>5.58</b>	<b>6.81</b>
<b>C</b>	<b>Other Employee Cost</b>			
1	Leave Travel Concession	0.09	0.63	0.63
2	Honorarium	0.09	0.12	0.12
3	Ex-gratia	7.20	5.00	8.84
4	Staff Welfare Expenses	11.07	6.75	10.81
5	Other Employee Cost	0.52	0.02	0.02
6	Capacity Building Charges	1.05	1.02	2.40
	<b>Sub-total (C)</b>	<b>20.02</b>	<b>13.54</b>	<b>22.83</b>
<b>D</b>	<b>Terminal Benefits</b>			
1	Pension	165.77	170.41	175.53
2	Gratuity	11.66	12.01	12.37
3	Leave Salary	14.79	15.16	15.62
4	Other (including contribution to NPS)	21.91	22.62	24.52
	<b>Sub-total (D)</b>	<b>214.12</b>	<b>220.20</b>	<b>228.03</b>
<b>E</b>	<b>Total Employees Cost (A+B+C+D)</b>	<b>508.57</b>	<b>544.15</b>	<b>568.95</b>
F	Less: Employees Cost Capitalised	14.90	14.90	14.90
<b>G</b>	<b>Net Employee Cost (E- F)</b>	<b>493.67</b>	<b>529.25</b>	<b>554.05</b>

- **Basic Pay and Grade Pay:** Basic Pay and Grade Pay proposed for FY 25-26 = Rs. **160.16** Cr. is based on actual cash flow for FY 24-25 with additional increment of 3% and average number of employee. OPTCL is planning to recruit 172 Nos. employees during FY 2024-25 and 280 Nos. in FY 2025-26.
- **DA:** OPTCL proposed 61% DA for FY 2025-26, considering Finance Dept guidelines. However, actual increase in DA may be reviewed.
- **HRA:** OPTCL proposed HRA @19%. Actual cash flow may be considered.
- **Outsourcing:** OPTCL is functioning with 50% of manpower and has outsourced services. Accordingly, Rs. 6.81 Cr. has been proposed towards payment to outsourced personnel. The same can be reviewed.
- OPTCL is planning to recruit 172 Nos. employees during FY 2024-25 and 280 Nos. in FY 2025-26 and has proposed Rs.10.53 Cr. towards stipend for the new recruiters. Considering the past trend of recruitment the same may be reviewed.
- Actual addition of employees is lesser than the approved. Stipend and employee cost should be approved by reviewing proposed addition of employees.
- Terminal benefits should be reviewed on actual cash flow basis.

Hence the Employee cost Expenses of OPTCL for FY 2025-26 may be approved accordingly by the Hon'ble Commission.

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Neelachal Ispat Nigam Limited  
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#### 4. Repair and Maintenance (R&M) expenses

That the OPTCL has projected Repair and Maintenance Expenses at Rs. 217.7 Cr for FY 2025-26 against Rs. 135 Crs as approved by the Commission to be spent during FY 2024-25.

The summary of Repair and Maintenance (R&M) expenses of OPTCL for the last fourteen financial years is furnished below.

**Summary of R & M Cost**


Financial Year	Proposed	Approved
2010-11	98.14	60
2011-12	93.89	75
2012-13	95.46	95
2013-14	108.91	60
2014-15	146.77	93
2015-16	154.11	108
2016-17	170.66	110.59
2017-18	155.11	124.97
2018-19	156.19	111
2019-20	115.22	115.22
2020-21	140.59	115.22
2021-22	151.1	118.61
2022-23	148.04	110.5
2023-24	164.34	135
2024-25	169.3	135
2025-26	217.7	

#### 5. Administration & General Cost

That the OPTCL has projected Administrative and General (A&G) expenditure at Rs. **49.8 Crs** for FY 2025-26 against Rs. **37.05 Crs** as approved by the Commission to be spent during FY 2024-25.

The summary of Administrative and General Expenses of OPTCL for the last fourteen financial years is furnished below.

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Neelachal Ispat Nigam Limited  
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**Summary of A&G Cost**

<b>Financial Year</b>	<b>Proposed</b>	<b>Approved</b>
<b>2010-11</b>	26.99	15.14
<b>2011-12</b>	38.34	18
<b>2012-13</b>	39.11	21.25
<b>2013-14</b>	23.09	22.39
<b>2014-15</b>	25.46	24.01
<b>2015-16</b>	32.36	24.37
<b>2016-17</b>	25.58	24.66
<b>2017-18</b>	26.11	25.6
<b>2018-19</b>	27.23	26.44
<b>2019-20</b>	28.07	27.55
<b>2020-21</b>	28.66	28.72
<b>2021-22</b>	38.13	30.35
<b>2022-23</b>	43.18	37.73
<b>2023-24</b>	47.07	40.28
<b>2024-25</b>	51.13	37.05
<b>2025-26</b>	49.8	

The Hon'ble Commission may review the Inspection fee expenses and training expenses. Details of training calendar and its benefits may be checked.

**6. Depreciation Cost**

That the OPTCL has projected depreciation expenditure at Rs. 356.57 Crs for FY 2025-26 against Rs. 275.67 Crs as approved by the Commission to be spent during FY 2024-25.

The summary of Depreciation of OPTCL for the last fourteen financial years is furnished below.

**Summary of Depreciation Cost**

<b>Financial Year</b>	<b>Proposed</b>	<b>Approved</b>
<b>2010-11</b>	153.31	76.6
<b>2011-12</b>	156.4	79.42
<b>2012-13</b>	155.99	78.57
<b>2013-14</b>	172.85	89.4
<b>2014-15</b>	176.02	92.71

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<b>2015-16</b>	197.72	107.48
<b>2016-17</b>	150.5	101.45
<b>2017-18</b>	192.59	130.76
<b>2018-19</b>	217.9	145.43
<b>2019-20</b>	186.03	162.06
<b>2020-21</b>	208.59	195.59
<b>2021-22</b>	276.5	232.95
<b>2022-23</b>	263	233.57
<b>2023-24</b>	293.96	269.54
<b>2024-25</b>	320.03	275.67
<b>2025-26</b>	356.57	

- Norms of tariff regulations and rates as specified in the Transmission Tariff regulations should be considered.
- The depreciation should be determined after due scrutiny.

**7. Annual Revenue Requirement:**

That the OPTCL has given the proposal for an annual revenue requirement of Rs. 1663.33 Crore for FY 2025-26 against Rs. 913.7 Crore as approved by the Commission to be spent during FY 2024-25.

The summary of ARR of OPTCL for the last fourteen financial years is furnished below.

<b>Financial Year</b>	<b>Proposed</b>	<b>Approved</b>
<b>2011-12</b>	1435.88	579.34
<b>2012-13</b>	1348.46	612.53
<b>2013-14</b>	874.74	597.87
<b>2014-15</b>	988.8	641.3
<b>2015-16</b>	1008.36	630.94
<b>2016-17</b>	975	623.25
<b>2017-18</b>	1013.63	639.4
<b>2018-19</b>	990.65	659.95
<b>2019-20</b>	861.27	706.71
<b>2020-21</b>	966.44	713.84
<b>2021-22</b>	1307.17	792.93
<b>2022-23</b>	1247.14	831.95

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Head, Electrical Maintenance  
Neelachal Ispat Nigam Limited  
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2023-24	1102	896.18
2024-25	1380.69	913.7
2025-26	1663.33	

Hence the Annual Revenue Requirement of OPTCL for FY 2025-26 may be approved accordingly through a prudence check and based on the submission made above by the Respondent.

#### 8. Determination of Transmission Charges

OPTCL has given the proposal for transmission charges @ **36.08 P/U** for FY 2025-26 against 24 P/Unit as approved by the Commission during FY 2024-25. The proposed Transmission Tariff of **36.08 P/U** is very high and should not be permitted. This will adversely affect the RST of the DISCOMS and will be a huge burden on the consumers of Odisha.

#### 9. Transmission Loss:

OPTCL has proposed transmission loss at 3.05%. In conformity with the power sector reform, OPTCL needs to reduce the transmission loss significantly. We propose to approve transmission loss of OPTCL at 2.5%.

However, in the neighbouring states such as Andhra Pradesh, where almost similar type of network configuration is available, the Electricity Regulatory Commission has considered the lower limit of intra-state transmission loss for the FY 2023-24 at the level of 2.80%. Further, the transmission losses approved by the respective Electricity Regulatory Commissions for other neighbouring states like West Bengal, Madhya Pradesh, Bihar, and Chhattisgarh with similar types of infrastructure are in the range of 2.23% to 3%.

In page 229, OERC Form T-6, OPTCL has considered gross input at 22625.18 MU and gross output 21925.96 MU for the period April 2024 to September 2024. Thus, the total loss for 6 months is 699.23 MU. However, it may be noted that a CGP of capacity 250 MW inject around 25 MU in a financial year to OPTCL grid as inadvertent injection. Now, considering operating capacity of CGP in Odisha at 9850 MW, the estimated inadvertent injection to OPTCL grid will be around 985 MU. Hence, in a period of six months the average inadvertent injection will be 492.5 MU. Thus, the reported transmission loss of OPTCL of 699.23 MU in six months is incorrect and is based on without any third party audit. If we account for the CGP inadvertent injection, then the loss will be around  $699.23 \text{ MU} - 492.5 \text{ MU} = 206.73 \text{ MU}$ . Thus, the OPTCL transmission loss will be around 0.91%. In view of the above submission, it is prayed before the Hon'ble Commission to consider the above and accordingly re-calculate and approve transmission loss.

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10. That OPTCL have not yet identified the areas where loss is maximum and OPTCL need to formulate action plans for loss reduction. OPTCL should inform the methodology adopted to estimate the transmission loss for every year. OPTCL should have undertaken energy audits of lines and substations to know the quantum of transmission loss in the system. There is enough measure by which OPTCL could reduce the Transmission loss. OPTCL should conduct energy audits and their standard performance should be monitored by a third party auditor appointed by the Commission so as to assess the actual performance of the licensees.

11. That earlier CGPs used to inject inadvertent power to the grid and GRIDCO availed the benefits of inadvertent power. GRIDCO also used to pay the hydro pool cost towards the inadvertent power. However, from FY 2019-20 onwards GRIDCO has stopped making payment towards inadvertent injections. Hence, OPTCL become the ultimate beneficiary of such injection of inadvertent power. We pray to Hon'ble Commission to direct OPTCL to submit the detail list of inadvertent injection for each month by each CGP and consider the same as an additional injection to the grid accordingly calculate the transmission loss. The data of inadvertent injection is available with OPTCL and SLDC for each month for each CGP who are connected to EHT transmission system of OPTCL. The entire stakeholder and consumers of Odisha will be benefitted by such methodology as the intra-state transmission loss will reduce significantly.

**12. Open Access Charges:**

In order to have an insights on the loading of existing transmission systems corresponding to the system peak demand of 6927.78 MW as touched in the month of June 2024. Each year Hon'ble OERC informed OPTCL to submit 400 kV, 220 kV, 132 kV Power Transformer and EHT lines loading. OPTCL should make a practice to submit the Power flow data for 400 kV, 220 kV line and 132 kV line and its loading and the entire Auto-transformer loading, Power Transformer and ICT loading along with the ARR application. Moreover by only submitting only power transmitted on the peak demand day will not solve the purpose. In order to ascertain the margin availability, OPTCL may be directed to submit the maximum power handling capability, power flow and % loading of all the 400 kV, 220 kV, 132 kV line and Power Transformer, Auto Transformer, ICT Transformers. It is also desired that OPTCL should conduct load flow analysis to handle around 2000-3000 MW differential load in appropriate manner.

Once these data are made available, it can be ascertained that, there are sufficient margin is available in the transmission network and in order to utilize it fully, STOA should be promoted and the charges for the same may be kept at 1/4 of the MTOA and LTOA charges and necessary amendments in the regulations may be made.

**13. Introduction of Reactive Energy Charges:**

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OPTCL has proposed to introduce Reactive Energy Charges of 3 Paise / KVARh which is very high and should be reduced in consultation with various stakeholders.

**14. Levy of Grid Support Charge for connectivity:**

OPTCL has submitted an application to the Hon'ble OERC on 26.06.2024, to determine and approve the imposition of Grid Support Charges for industries with Captive Generating/Cogeneration plants that operate alongside the OPTCL grids.

The case was registered as OERC Case No.-44/2024. In an order dated July 6, 2023, the High Court suggested that if OPTCL wishes to pursue the imposition of Grid Support Charges, they should file a separate application with the OERC. The court emphasized that the OERC, under Section 181 of the Electricity Act, should examine the justifiability of such charges. Hon'ble Commission in order dated 09.07.2024 in case no 44 of 2024 has directed OPTCL to submit a consolidated report considering certain queries. Therefore, the proposal of OPTCL to levy of Grid Support Charge for FY 2025-26 for connectivity may be rejected.

**15.** The Commission may direct OPTCL to continuously monitor the operation of transmission system, prevent over loading/under loading wherever possible by taking suitable measures and take up innovative action for optimum loading of the existing network for further reduction of loss.

**16.** Further, OPTCL has mentioned that some of the substations are operating in under loaded condition because of absence of downstream infrastructure of DISCOMs. The Commission directs OPTCL to take action for a co-ordinated development of intra-state network, ISTS and downstream distribution network. The time frame of execution of transmission system should be discussed with DISCOMs & CTU in order to avoid stranded assets and idle investments.

**17.** Therefore, the Commission should direct that no transmission system strengthening proposals should be executed without the prior approval of the Commission. OPTCL should submit the comprehensive system study along with requirements as specified in the licence conditions of OPTCL and tariff regulations for approval of the Commission before proceeding for execution of the project.

**18.** The Commission therefore should direct OPTCL to take up the matter with Government of Odisha to fund the economically unviable projects and the other projects that are required for the larger interest of the State through grants.

**19.** OPTCL should be directed to consider the meter data to assess the month-wise transmission loss in intra-state transmission system including losses at different voltage levels (i.e. 132 kV, 220 kV and 400 kV levels).

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Head, Electrical Maintenance  
Neelachal Ispat Nigam Limited  
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**PRAYER**

In the facts and circumstances stated above and in the interest of the parties and the larger interest of the State the Hon'ble Commission be pleased to pass appropriate orders to the effect that

1. ARR of OPTCL may be approved accordingly based on the submission made above.
2. The Transmission Charges should be reviewed and reduced substantially.
3. Transmission loss to be reduced considering the submission made for FY 2025-26.
4. Proposal of Reactive energy charges of 3 paise/KVARh should be reduced.
5. Proposal of OPTCL to levy of Grid Support Charge for connectivity may be rejected.
6. Each year truing up exercise and business plan approval should be carried out by Hon'ble commission through a process of public hearing.

**Place: Bhubaneswar**

**For M/s. Neelachal Ispat Nigam Limited**

**Date: 16.01.2025**

  
**Authorized Signatory**

Kundan Prasad  
Head, Electrical Maintenance  
Neelachal Ispat Nigam Limited  
Dabhuri, Jajpur, Odisha

**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur  
Bhubaneswar-751021**

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BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
PLOT NO. 4, CHUNAKOLI, SAILESHREE VIHAR,  
CHANDRASEKHARPUR, BHUBANESWAR-751021

CASE NO. 93/2024  
FILING NO. 3

**IN THE MATTER OF:** (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**And**

(ii) Truing up application for the FY 2023-24 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

**AND**

**IN THE MATTER OF:** Odisha Power Transmission Corporation Limited, Janpath,  
Bhubaneswar

..... Applicant

**vrs**

**M/s. Neelachal Ispat Nigam Limited**, Kalinganagar Industrial  
Complex, Duburi, Dist-Jajpur, Pin-755026 and **15 others**.

..... Objectors

**Rejoinder to the objections raised by the Objector M/s.  
Neelachal Ispat Nigam Limited.**

**The humble applicant above named**

**MOST RESPECTFULLY SHEWETH:**

1. That, the Objector M/s. Neelachal Ispat Nigam Limited vide affidavit dated 16.01.2025 has raised certain submissions on ARR & Transmission Tariff Application

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*Prabbeer Kumar Mallick*

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of OPTCL for FY 2025-26 and Truing up application for FY 2023-24. In reply, OPTCL submits its rejoinder to the submissions in the following paragraphs.

**Rejoinder to Para 3 to 7:**

That, the respondent has submitted the statistical data related to the past year comparing the proposed vis-à-vis approval in respect of expenses towards human resource expenses , R&M expenses , A&G expenses, depreciation with a request to approve accordingly after due scrutiny. In this regard it is submitted that OPTCL has submitted its ARR application for FY 2025-26 as per the various provisions stipulated in OERC (Terms & Conditions for Determination of Transmission Tariff) Regulations, 2014 and directions of the Commission passed in different orders with proper justifications.

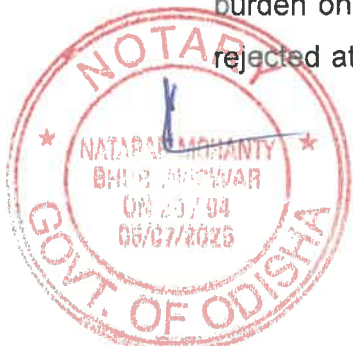
**Rejoinder to Para 8:**

**Determination of Transmission Charges:**

The Transmission infrastructures are created considering the demand and request of the DISCOMs from time to time, after due approval from the Hon'ble OERC through Transmission Plan. Being a Transmission License, OPTCL has always endeavored to create the Transmission infrastructure for providing reliable and quality power to the consumers of DISCOMs. Accordingly, every year OPTCL is adding more transmission assets to meet the requirement of DISCOMs. Transmission Charge is arrived at 36.08 paise per unit by dividing the total ARR of OPTCL with the recent realistic MU projections of DISCOMs and recovered from them on a monthly basis. This rate will decrease if DISCOMs drawal increase. Alternatively, OPTCL is proposing to recover the Transmission charges on a monthly basis, based on the recent realistic MU projections of DISCOMs, **irrespective of the drawal.**

The proposed Transmission Charge of 36.08 p/u has been derived by considering the recent realistic energy demand projections of 38764.29 MU as communicated by the DISCOMs & other LTOA customers and the ARR figures have been arrived by OPTCL justifying component wise projections as per the provisions contained in OERC Transmission Tariff Regulations, 2014, OPTCL's Audited Accounts for FY 2023-24, all relevant data/information and materials. The details of projections are submitted in page 51-52 of the present ARR application of OPTCL for FY 2025-26. Moreover, OPTCL had furnished all requisite information and details as per the prescribed formats of the Hon'ble Commission with full justifications.

Hence, mere apprehension of the respondent towards imposition of excessive burden on Discoms seems to be inappropriate and unacceptable which is likely to be rejected at this juncture. Moreover, the contention of the stake holder operating in the



value chain of electricity needs to appreciate the fact that the cost recovery has to be in full so as to make the sector sustainable.

Hence, OPTCL does not agree with the views of the Objector.

**Rejoinder to Para 9 to 11:**

**Transmission Loss**

First of all, the proposal to approve transmission loss of OPTCL at 2.5% is baseless and without any study.

The actual transmission loss for the period **Apr' - Sep' 2024** is calculated to be **3.09%** as shown in the ARR & TT application for FY 2025-26 (page-229). This figure is **less than the actual** transmission loss during last year i.e. **3.11%** for **FY 2023-24**. In fact, OPTCL had projected Transmission loss of 3.05% for FY 2024-25, but Hon'ble Commission had set a target of 3.00% which could not be achieved yet.

In OPTCL system, the transmission loss is purely technical loss and a function of real time injection of power by a number of generators, system configuration and power flow requirements at different load centers. It depends on many parameters / factors such as distance and mismatch between generation and load centers, types of load, reactive power compensation, voltage profile, seasonal variation of demand load etc. Thus, OPTCL does not have much control over the same at any point of time. The transmission system of OPTCL operates as an integral part of the Eastern Region Grid to serve the internal demand of the State as well as to carry out import and export of power depending upon the system demand.

As of the matter of fact, some grid s/s and lines are being constructed in many remote and deprived areas funded under Central & State Govt. schemes in the interest of public. Additional length in EHT lines and Sub-stations in under-loaded areas are also responsible for increase in transmission loss.

The Transmission Loss in OPTCL network is in a gradually reducing trend over the years i.e. from 3.73% during 2014-15 to 3.11% in 2023-24 and has remained 3.09% within 1<sup>st</sup> six months of FY 2024-25 mainly due to addition of infrastructure and various system strengthening works taken up by OPTCL. The actual losses incurred over the years by OPTCL have been within the margin allowed by Hon'ble Commission up to the year FY 2017-18. However in FY 2018-19, the commission set the loss at 3.00% though the projected transmission loss was at 3.25% and thereafter the commission has been pegging the transmission loss at the same level though loss projected by OPTCL remained in a downward trend.



Year	Tr. Loss proposed	OERC Approval	Actual
2014-15	3.75%	3.75%	3.73%
2015-16	3.75%	3.75%	3.67%
2016-17	3.70%	3.70%	3.58%
2017-18	3.50%	3.50%	3.34%
2018-19	3.25%	3.00%	3.28%
2019-20	3.25%	3.00%	3.25%
2020-21	3.20 %	3.00%	3.22%
2021-22	3.15%	3.00%	3.18%
2022-23	3.10%	3.00%	3.15%
2023-24	3.10%	3.00%	3.11%
2024-25	3.05%	3.00%	3.09% (1 <sup>st</sup> six months )

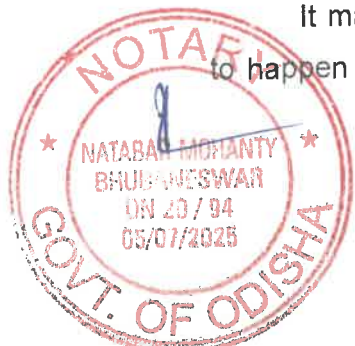
From the table given above, it is also clear that each year upto FY 2017-18, the transmission loss achieved by OPTCL has remained at a level lower than the approved figures by Hon'ble commission and from FY 2018-19 the target set by OERC appears to be very stiff which was hard to achieve though the trend of lesser transmission loss year after year has been achieved.

That the transmission losses depend upon the voltage level at which the power is transmitted. The transmission losses are higher where the percentage of lower voltage (132kV or below) transmission system is higher. A comparison of the average transmission losses of a few state transmission licensees and their corresponding transmission assets at low voltage level (132 kV) is shown below.

**TRANSMISSION LOSS (%) OF OTHER STATES OF LOW VOLTAGE LINES  
UPTO 132KV FOR FY 2023-24**

States	% of Low voltage Lines (up to 132 kV)			Actual Transmission Losses for FY 2023-24 (%)
	Transmission Lines up to 132kV (Ckm)	Total Transmission Lines (Ckm)	% of Transmission Lines up to 132kV	
Odisha (OPTCL)	8479.831	16508.068	51.36%	3.11
Uttar Pradesh (UPPTCL)	28733	60145	47.77%	3.22
Gujarat (GETCO)	44512	73054	60.93%	3.83

It may be kindly be appreciated that the transmission loss (technical) is bound to happen as per law of physics and is very difficult to reduce after a certain level.



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*Poojbeer Kumar Mallik*

Also, at all India level, the transmission loss of utilities have remained at more than 3.00% and to suffice our view point the table is given below for kind appreciation of Hon'ble Commission.

**Transmission loss of Different states for FY 2023-24**

Name of states	Tr. loss approved by State Commission	Actual Tr. loss
Uttar Pradesh (UPPTCL)	3.22%(UERC)	3.22%
Gujarat (GETCO)	3.60% (GERC)	3.83%
Assam (AEGCL)	3.30%(AERC)	3.30%
Rajasthan (RVPN)	4.50%(RERC)	4.23%
Himachal Pradesh (HPPTCL)	3.19% (HERC)	3.25%

All India average transmission loss for the period 06-01-2025 to 12-01-2025 as published by Grid Controller Of India Limited, National Load Despatch Centre dated 18.01.025 is 4.00 %. Further, as per the CEA General Review 2024 (Containing Data for the Year 2022-23) the transmission loss of Eastern Region is 3.37% (attached as **Annexure-01**). Present transmission loss level of OPTCL is much less than both the said cases (i.e. Grid Controller Of India Limited & CEA General Review 2024).

However, as a responsible Transmission utility, OPTCL is making an all-out effort to reduce the transmission loss further by undertaking various **system operation and loss reduction measures** by implementing the emerging technologies like **system Automation**, load bifurcation, **modification in system configuration**, procurement of more efficient equipment, **Digitalization of grids** by using SAS, Protection system improvement using Busbar protection and Event Logger, **Conversion of Radial to Ring system**, Advanced Metering Infrastructure etc. to bring it to **3.05% by FY 2025-26**.

**Regarding inadvertent power**

OPTCL does not agree to the assumption of the respondent that around 985MU of inadvertent power will be injected in OPTCL system in a year considering the CGP capacity 9850MW. In this regard it is submitted that during the last six months, it is observed that total inadvertent power injection is 239.38MU which has been already considered while calculating the Transmission loss of 3.09% in form T-6. Hence, Transmission loss as suggested by the Objector is not just and proper. Details of inadvertent power injected by CGPs in FY 2024-25 till November is attached as

**Annexure-02.**

*Prabir Kumar Mallik*

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Further, it is submitted that Transmission charge is being computed on Open access transactions based on scheduled energy. Hence, OPTCL does not reap any benefit out of inadvertent power.

**Steps taken for Energy Audit**

Around 2600 nos. of 0.2s Accuracy Class ABT Energy meters are required for different metering points at all Grid Substations of OPTCL for billing and audit purposes. 538 nos. of meters have been installed by OPTCL at different metering points. 2000 nos. energy meters will be installed at different Grid Substations under SAMAST Project, out of which 70 nos. meters have been installed and the installation process of balance meters are in progress. The installation of energy meters for balance metering points under **SAMAST** Project will be completed by 31st October 2025. After installation of the meters, energy audit and calculation of transmission losses of OPTCL on an element-wise at different voltage levels will be feasible.

**Rejoinder to Para 12:**

**Open Access Charges:**

That the system peak demand of 6927.78 was touched on dated 19.10.2024. Statement on the loading pattern of the existing transmission system (400kV, 220kV, 132kV power transformers and EHT lines) corresponding to the peak demands is attached as **Annexure-03**. OPTCL has already conducted load flow study considering different load scenario i.e Summer peak, Winter lean, High hydro, Low Hydro & Solar Peak, in the Revised 14<sup>th</sup> Intra-state Transmission Plan of Odisha for FY 2022-23 to FY 2026-27, which has been approved by Hon'ble Commission vide case no. 08/2024. In the aforesaid report percentage loading of all Transmission line, ICT, Auto & Power Transformers till FY 2026-27 have been mentioned. The Transmission infrastructures are created considering the demand and request of the DISCOMs from time to time, after due approval from the Hon'ble OERC through Transmission Plan and the DISCOMs and other LTOA customers are responsible to bear the full approved ARR of OPTCL. STOA charges is being charged as per the Open Access Regulations, 2020.

**Rejoinder to Para 13:**

**Reactive Energy Charges:**

As per Regulation 31(1) under Chapter-7 (IMBALANCE AND REACTIVE ENERGY CHARGES) of the OERC (Terms and Conditions of Intra-State Open Access) Regulations, 2020, payment for the reactive energy charges by open access consumers shall be in accordance with provisions stipulated in the State Grid Code or

as may be specified in relevant regulations/orders of the Hon'ble Commission .



The Hon'ble Commission in Para 16 (page 5) of the order dated 05.02.2019 in Case No. 50/2017 has inter alia viewed that the provisional reactive energy charges of 3 paise/KVArH as allowed in the ARR order of OPTCL for FY 2018-19 continue for time being till a final justification is submitted by OPTCL in consultation with the stakeholders. However, OPTCL **has not realized any revenue** from Reactive Energy Charges so far.

In view of the above, OPTCL proposes that 3paise/KVARh may be approved provisionally as Reactive Energy Charges for FY 2025-26.

Hence, the proposal of objector to reduce the reactive energy charges as suggested by OPTCL is not just and proper.

**Rejoinder to Para 14:**

**Levy of Grid Support Charge for connectivity:**

The benefits derived by the CGPs with co-located loads are enormous. The benefits are in the nature of ancillary services which are not paid till now. The Grid support charges (GSC)/Parallel operation charge has been levied by different state Regulatory Commissions and upheld by APTEL and Supreme Court of India through various orders and hence proposed by OPTCL through a separate petition. Recently, OPTCL had filed an application (case No. 44 of 2024) on 26.06.2024 for determination and approval for levy of Grid Support Charges for industries having Captive Generating / Cogeneration plants and running in parallel with the Grids of OPTCL. Hon'ble Commission in its order directed OPTCL to submit a consolidated report considering the observations/queries raised by the stakeholders in the earlier Cases filed by OPTCL. In compliance to above, OPTCL is in final stage of preparation of the required consolidated report and will be submitted before Hon'ble Commission shortly.

**Rejoinder to Para 15 & 16:**

To prevent overloading, regular system study has been carried out and augmented the network capacity as when required. Priority has been given to use of under loaded network. As directed by Commission regular meeting has been conducted with DISCOMs for creation of downstream infrastructure for optimum utilization transmission networks.

**Rejoinder to Para 17:**

OPTCL always executes its projects which are either approved in Business Plan of OPTCL or Intra State Transmission Plan. As per the license conditions, OPTCL is mandated to take prior approval of Hon'ble Commission for any transmission projects above Rs. 10 Cr. which OPTCL has been following scrupulously.



**Rejoinder to Para 18:**

Since the creation of a transmission infrastructure requires huge investments, OPTCL always request state Government for financial support. State Govt. has been contributing 100% financial assistance in shape of grant/equity in case of non-remunerative and contributing 30% equity support in case of remunerative projects.

2. The objections not specifically admitted may be deemed to have been denied.

**PRAYER**

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of M/s. Neelachal Ispat Nigam Limited while approving ARR and Transmission Tariff of OPTCL for FY 2025-26 & Truing up application for the FY 2023-24.

Bhubaneswar  
January 31, 2025

By the Applicant  
Through

*Poojinder Kumar Malhotra*

Sr. GM (EI.), RT&C



**Table 6.2**  
**Regional Transmission Losses**  
**Utilities**  
**2022-23**

Region	Energy Available in the Region (GWh)	Export to other Region (GWh)	Export to Nepal (GWh)	Export to Bangladesh (GWh)	Export to Bhutan (GWh)	Export to Myanmar (GWh)	Total Energy drawal by States/Utilities (GWh)	Transmission Losses (GWh)	Transmission Losses (%)
1	2	3	4	5	6	7	8	9 (2-3-4-5-6-7)	10((8/2)x100)
Northern Region	235784.74	3399.70	343.64	0.00	0.00	0.00	224171.69	7869.71	3.34
Western Region	282367.53	57344.05	0.00	741.34	0.00	0.00	215219.30	9062.84	3.21
Southern Region	173393.55	7625.46	0.00	3491.13	0.00	0.00	156314.82	5962.13	3.44
Eastern Region	134352.68	57191.16	314.03	7547.70	266.30	0.00	64506.41	4527.08	3.37
North Eastern Region	21117.54	4662.00	0.00	1039.50	38.47	9.81	14499.49	868.27	4.11



SL. No.	CGP Stations	STATEMENT OF FREE POWER OF CGPS FOR FY 2024-25												TOTAL Injected (In Kwh)
		APRIL'24 Injected (In Kwh)	MAY'24 Injected (In Kwh)	JUN'24 Injected (In Kwh)	JULY'24 Injected (In Kwh)	AUG'24 Injected (In Kwh)	SEPT'24 Injected (In Kwh)	OCT'24 Injected (In Kwh)	NOV'24 Injected (In Kwh)					
1	IMFA	9,64,093	8,71,590	9,66,013	6,90,482	6,60,805	8,44,052	11,81,938	8,61,089	70,40,062				
2	NALCO	10,68,227	11,48,265	82,715	3,79,525	1,19,400	2,91,407	7,95,571	3,54,861	42,39,971				
3	ARATI STEELS	8,62,606	9,17,113	7,95,889	8,37,134	9,54,267	7,77,542	12,32,834	4,38,520	68,15,905				
4	Aryan Ispat Ltd.	1,99,004	75,496	94,374	1,28,766	75,923	1,18,270	1,13,984	93,094	8,88,911				
5	BPSL	55,93,922	73,91,485	59,86,547	47,02,977	55,65,774	84,85,797	73,22,641	56,03,633	5,06,52,776				
6	TATA BSL (BSL)	1,04,87,992	80,79,802	1,02,02,963	1,00,97,489	59,31,643	69,64,899	1,07,69,509	78,60,310	7,03,94,607				
7	DINABANDHU	-	-	28,262	5,86,618	7,74,738	6,15,824	3,96,009	4,16,635	28,18,086				
8	HINDALCO	12,76,300	13,30,670	13,48,750	14,65,620	15,47,850	13,96,940	14,27,620	15,00,550	1,12,94,300				
9	IFFCO	730	210	480	1,990	31,380	55,630	4,700	140	95,260				
10	JSL	10,68,260	10,39,500	12,65,930	8,91,100	7,64,870	7,70,640	9,64,040	11,83,350	79,47,690				
11	JSPL	37,70,844	28,08,670	34,11,545	54,03,917	9,81,356	23,35,330	40,58,051	83,47,885	3,11,17,598				
12	BPPL	1,30,416	1,35,928	1,54,348	2,60,512	3,73,954	8,90,365	2,25,416	1,78,372	23,49,311				
14	MAITHAN	14,48,004	9,09,222	4,00,413	6,83,208	10,57,109	9,66,770	10,59,627	7,65,805	72,90,158				
15	NARBHERAM	2,01,659	58,238	1,03,200	-	56,914	2,25,360	1,47,510	2,39,699	10,32,580				
16	NINL	5,028	31	26,323	96,865	5,696	95,165	11,240	3,849	2,44,197				
17	MGM	1,82,571	1,45,479	2,35,893	2,52,226	2,21,855	2,06,940	3,12,429	2,19,178	17,76,571				
18	NAVA L.TD.	4,20,921	4,75,773	6,19,574	5,53,073	7,28,331	5,59,808	4,39,361	5,28,169	43,25,010				
21	DALMIA CEMENT (OCL)	2,99,204	3,75,083	2,94,627	3,14,046	1,72,849	3,16,147	2,67,925	2,33,407	22,73,288				
22	Debtor (Dalmia Kapitas)	66,891	69,910	60,865	80,334	1,19,485	1,63,380	86,986	65,883	7,13,734				
23	PATNAIK STEEL	2	1	1	-	14	-	460	5	483				
24	RSP	3,45,754	1,88,727	1,65,840	8,04,091	1,12,952	4,43,299	5,56,802	3,34,735	29,52,200				
25	MSP METALICS	1,59,426	-	75,880	1,66,416	1,11,304	1,39,010	1,22,197	1,67,099	9,41,332				
26	SHYAM METALICS	1,38,910	2,80,040	74,430	1,94,760	1,21,420	1,68,600	38,210	1,57,180	11,73,550				
27	TATA SPONGE	2,29,645	2,60,280	1,46,805	2,05,081	3,30,178	4,44,025	2,84,981	3,81,790	22,82,785				
28	VAL JHARSUGUDA	2,30,917	3,43,139	2,62,600	2,42,700	2,30,926	4,54,063	5,40,147	3,10,124	26,14,616				
29	VAL LANJIGARH	2,75,100	4,13,880	6,10,070	7,13,440	6,33,460	7,86,250	8,79,780	6,37,430	49,49,410				
30	VISA	7,71,061	10,05,163	9,47,300	9,47,300	30,61,941	12,17,292	14,18,462	12,09,048	96,30,267				
31	OSISL	7,65,935	4,69,738	3,29,024	2,69,420	5,23,439	3,70,361	5,48,210	3,71,584	36,47,711				
34	SHREE GANESH	1,00,210	1,55,053	2,54,522	3,41,391	4,46,352	4,17,582	4,09,942	10,46,114	31,71,166				
35	FACOR	2,65,677	5,50,814	7,41,583	8,52,098	6,34,255	7,53,202	8,37,072	7,47,334	53,82,036				
36	ADITYA/LAPANGA	6,78,480	8,25,910	8,25,390	7,56,250	8,02,740	7,21,920	8,59,310	7,69,820	62,39,820				
37	Arcelor Mittal Nippon Steel	4,772	90,245	99,500	1,11,325	65,628	29,951	55,182	58,708	5,16,311				
38	BEL	2,10,320	2,69,476	2,62,673	2,75,829	2,49,068	1,95,433	2,25,838	1,87,062	18,75,699				
40	Viraj steel	6,27,076	8,81,557	8,63,335	11,05,979	7,99,391	62,967	5,69,458	5,82,286	54,92,049				
41	RUNGTA MINES DSP	30,64,885	34,10,700	31,31,957	33,01,927	26,70,196	33,64,501	33,82,666	27,08,923	2,50,35,755				
42	Runga mines(Badbil)	5,57,936	6,40,070	5,87,227	3,86,202	7,21,501	4,01,154	3,09,846	4,97,457	36,01,393				
43	Runga mines(Kamanda steel ltd.)	12,15,441	1,23,304	1,604	16,842	2,98,357	3,89,125	44,787	18,658	21,08,118				
44	SMC JHARSUGUDA	4,28,253	5,30,964	5,22,235	5,29,910	4,25,823	4,82,690	6,53,975	2,05,400	37,79,250				
45	SMC BADMAL	2,11,661	1,87,531	4,95,099	4,79,752	4,68,993	4,71,241	4,18,625	1,30,510	28,63,432				
46	ABREL	35,599	53,714	33,667	42,270	38,116	38,364	35,739	27,841	3,05,310				
47	KJS ALUWALIA	2,42,458	26,81,937	8,05,113	10,75,172	3,71,659	6,54,355	11,680	58,42,374					

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48	SHREE CEMENT	43,307	77,658	1,48,698	1,72,642	2,11,054	2,05,650	1,46,729	93,075	10,98,813
49	JAGANNATH POWER	4,31,538	6,59,109	7,10,884	8,95,731	9,60,536	4,04,745	6,09,344	7,82,263	54,54,150
50	ABREL KHAJURIAKATA	7,74,171	55,849	45,539	74,081	72,652	56,116	50,496	44,857	11,73,761
51	THAKUR PRASAD					7,00,673	1	5	1	7,00,680
53	ADHUNIK METALICS								5,93,528	5,93,528
54	OCL								5,70,453	5,70,453
	TOTAL CGP	3,98,45,226	3,73,05,387	4,00,96,511	4,01,69,132	3,54,10,340	3,84,69,467	4,44,70,009	4,15,39,394	31,73,05,466
	TOTAL (MU)	39.85	37.31	40.10	40.17	35.41	38.47	44.47	41.54	317.31

Loading pattern corresponding to the peak demand of 6928 MW (including Vedanta drawal) on 19-JUNE-2024 AT 16:00 hrs			
FEEDER NAME	MW	Rated Capacity in MW	% Loading
400KV MENDHASAL - PANDIAVAL2	50.43		
400KV MERAMUNDALI-BOL_PG	0.00		
400KV MERAMUNDALI-KANIHA1	-637.76		
400KV MERAMUNDALI-KANIHA2	-385.39		
400KV INDRAVATI ICT1	-67.47		
400KV INDRAVATI ICT2	-66.91		
400KV MERAMUNDALI-BOL_PG	0.00		
400KV DUBNW- KALABADIA	-368.96		
400KV_OPGC-JHARS_PG - 1	230.36		
400KV_OPGC-JHARS_PG - 2	150.50		
MENDHASAL -PANDIAVIL 1	49.34		
DUBNW- PANDIAVAL	75.67		
VEDANTA-JHARSUGUDA1 PG	-40.51		
VEDANTA-JHARSUGUDA2 PG	-40.23		
220KV JODA-JAMSHEDPUR	5.54	192	3%
220KV JODA-RAMCHANDRAPUR	-156.72	192	86%
KATAPALLI2-BOLAN PG	0.00	192	0%
SADEIPALLI2-BOLAN PG	-127.65	192	70%
220KV RENGALI-RENGALI PG 1	24.96	192	14%
220KV RENGALI-RENGALI PG 2	9.33	192	5%
220KV RENGALI-KANIHA	-132.61	192	73%
220KV TTPS-KANIHA	136.08	192	75%
220KV MERAMUNDALI-KANIHA 1	-107.71	192	59%
220KV MERAMUNDALI-KANIHA 2	-103.58	192	57%
220KV JAYANAGAR-JEPORE PG 1	-22.71	192	12%
220KV JAYANAGAR-JEPORE PG 2	-23.86	192	13%
220KV BUDHIPADAR-KORBA 1	-4.14	192	2%
220KV BUDHIPADAR-KORBA 2	-2.92	192	2%
220KV BUDHIPADAR-KORBA 3		192	0%
220KV TARKERA-BISRA 1	-201.68	350	61%
220KV TARKERA-BISRA 2	-205.17	350	62%
132KV KALABADIA-BANGIRIPOS	62.92	76	87%
132KV KALABADIA-BARIPADA	66.95	76	93%
220KV KALABADIA-BALASORE 1	176.81	192	97%
220KV KALABADIA-BALASORE 2	177.28	192	97%
NET - KALABADIA DRAWL	-916.91		
ATRI_AUTO-1	98.39	160	65%
ATRI_AUTO-2	98.61	160	65%
BALAS AUTO1	-77.17	160	51%
BALAS AUTO2	-76.75	160	50%
BALAS_AUTO-3	-76.34	160	50%
BHADR AUTO1	0.00	100	0%
BHADR AUTO2	91.01	160	60%
BHADR_AUTO-3	91.84	160	60%

BHANJ AUTO1	53.54	160	35%
BHANJ AUTO2	47.17	160	31%
BIDAN AUTO1	-54.85	100	58%
BIDAN AUTO2	0.00	100	0%
BIDAN AUTO3	23.75	160	16%
BOLNW AUTO1	67.28	160	44%
BOLNW AUTO2	70.89	160	47%
BOLNW_AUTO-3	66.65	160	44%
BUDHI AUTO1	92.49	160	61%
BUDHI AUTO2	52.98	160	35%
BURLA AUTO1	35.41	100	37%
BURLA AUTO2	35.34	100	37%
BURLA_AUTO-3	53.04	160	35%
CHAND AUTO1	56.32	100	59%
CHAND AUTO2	97.51	160	64%
CHAND AUTO3	60.82	100	64%
CHAND AUTO4	94.03	160	62%
DUBURI AUTO1	58.66	160	39%
DUBURI AUTO2	56.70	160	37%
DUBURI AUTO3	37.08	100	39%
GODA_AUTO-1	30.13	160	20%
GODA_AUTO-2	30.47	160	20%
JAYAN AUTO1	47.72	160	31%
JAYAN AUTO2	40.76	160	27%
JODA AUTO1	64.76	160	43%
JODA AUTO2	65.89	160	43%
JODA AUTO3	53.73	100	57%
LAPAN_AUTO-1	81.15	160	53%
LAPAN_AUTO-2	81.07	160	53%
MERAM AUTO1	39.55	100	42%
MERAM AUTO2	38.57	100	41%
MERAM AUTO3	37.43	100	39%
NAREN AUTO1	0.00	160	0%
NAREN AUTO2	0.00	160	0%
NAREN AUTO3	0.00	100	0%
PARAD AUTO1	-46.12	100	49%
NAYAG POWXFMR1	22.55		
NAYAG POWXFMR2	13.44		
NAYAG POWXFMR3	-22.16		
TATAPOWER1	-4.60		
TATAPOWER2	-2.02		
VAL DRAWAL	-959.45		
VEDANTA IPP	499.41	600	88%
ATRI-PANDIAVIL-1	-107.98	192	59%
BHOGRAI-KUCHEI	-29.34	76	41%
JALESWAR-KUCHEI	-40.58	76	56%
ADITYA_LOAD	0.00		
INFA-THERU	37.25	76	52%
ATRI-PANDIAVIL-2	-108.85	192	60%
220KV_KJHAR_GR-KEONJ_PG - 1	-11.58		

220KV_KIHAR_GR-KEONJ_PG-2	-11.75		
LAXMIPUR_POWER TRANSFORMER	2.97	20	16%
PARAD AUTO2	-74.20	160	49%
PARAD AUTO3	-67.87	160	45%
TARKE AUTO1	50.91	100	54%
TARKE AUTO2	52.13	100	55%
TARKE AUTO3	51.04	100	54%
TARKE AUTO4	0.00	100	0%
THERU AUTO1	-22.22	100	23%
THERU AUTO2	21.45	100	23%
TTPS AUTO1	411.78		
TTPS AUTO2	0.00		
BOLNW_BOLAN_PG-2	-127.65	192	70%
132 KV ANAND_BAITARANI PWR	-0.03		
220 KV_NAREN_TATA GOPALPUR FDR-1	0.00	192	0%
220 KV_NAREN_TATA GOPALPUR FDR-1	3.32	192	2%
220 KV_JAYAN_JEYPO FDR-3	-20.90	192	11%
220 KV_JAYAN_JEYPO FDR-4	-23.87	192	13%
KESINGA - BOLANGIR PG	-60.98	192	33%
PRATAPSASAN-PANDIAVIL - 1	-111.61	192	61%
PRATAPSASAN-PANDIAVIL - 2	-111.83	192	61%
220 BUDHIPADAR - SMC 1	-13.22	192	7%
132 LAPAN - SMC	21.64	76	30%
132KV JODA-KENDUPOSI	22.42	76	31%

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur  
Bhubaneswar-751021

Case No: 93/2024

Filing No: 1

IN THE MATTER OF:

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022.

... Applicant

AND

IN THE MATTER OF:

M/s. Bhushan Power and Steel Limited, having manufacturing unit at P.O-Lapanga, P.S. Thelkoloj, Teh-Rengali, Sambalpur, Odisha-768212, Email: [rakesh.pujari@jsw.in](mailto:rakesh.pujari@jsw.in)

...Respondent

The humble respondent above named most respectfully submit as under:

1. That the objector i.e. M/s. Bhushan Power and Steel Limited (hereinafter referred as "BPSL" / "Objector") is a company incorporated under the provisions of the Companies Act, 1956, having its registered office at 4th Floor, A-2, NTH Complex, Shaheed Jeet Singh Marg, Qutab Institutional Area, New Delhi- 110067 and one of its captive power plants at its manufacturing unit at P.O-Lapanga, P.S. Thelkoloj, Teh-Rengali, Sambalpur, Odisha-768212.
2. That the Respondent is submitting the following points on the application of OPTCL for determination of Annual Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 for kind review and necessary action by the Hon'ble Commission.



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### 3. Determination of Transmission Charges

OPTCL has given the proposal for transmission charges @ 36.08 P/U for FY 2025-26 against 24 P/Unit as approved by the Commission during FY 2024-25. The proposed Transmission Tariff of 36.08 P/U is very high and should not be permitted. This will adversely affect the RST of the DISCOMS and will be a huge burden on the consumers of Odisha.

### 4. Transmission Loss:

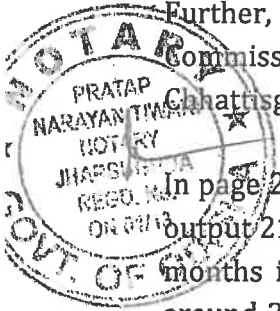
OPTCL has proposed transmission loss at 3.05%. In conformity with the power sector reform, OPTCL needs to reduce the transmission loss significantly. We propose to approve transmission loss of OPTCL at 2.5%.

However, in the neighbouring states such as Andhra Pradesh, where almost similar type of network configuration is available, the Electricity Regulatory Commission has considered the lower limit of intra-state transmission loss for the FY 2023-24 at the level of 2.80%.

Further, the transmission losses approved by the respective Electricity Regulatory Commissions for other neighbouring states like West Bengal, Madhya Pradesh, Bihar, and Chhattisgarh with similar types of infrastructure are in the range of 2.23% to 3%.

In page 229, OERC Form T-6, OPTCL has considered gross input at 22625.18 MU and gross output 21925.96 MU for the period April 2024 to September 2024. Thus, the total loss for 6 months is 699.23 MU. However, it may be noted that a CGP of capacity 250 MW inject around 25 MU in a financial year to OPTCL grid as inadvertent injection. Now, considering operating capacity of CGP in Odisha at 9850 MW, the estimated inadvertent injection to OPTCL grid will be around 985 MU. Hence, in a period of six months the average inadvertent injection will be 492.5 MU. Thus, the reported transmission loss of OPTCL of 699.23 MU in six months is incorrect and is based on without any third party audit. If we account for the CGP inadvertent injection, then the loss will be around 699.23 MU - 492.5 MU = 206.73 MU. Thus, the OPTCL transmission loss will be around 0.91%. In view of the above submission, it is prayed before the Hon'ble Commission to consider the above and accordingly re-calculate and approve transmission loss at 0.91%.

5. That OPTCL have not yet identified the areas where loss is maximum and OPTCL need to formulate action plans for loss reduction. OPTCL should inform the methodology adopted to estimate the transmission loss for every year. OPTCL should have undertaken energy audits of lines and substations to know the quantum of transmission loss in the system. Proposing the transmission loss arbitrarily without giving the breakup of the losses in different components of transmission system i.e., lines, substations, power transformers



and auto transformers etc are not appropriate for the S.T.U. Thus proposing loss as per the business plan is meaningless. There is enough measure by which OPTCL could reduce the Transmission loss. OPTCL should conduct energy audits and their standard performance should be monitored by a third party auditor appointed by the Commission so as to assess the actual performance of the licensees.

6. That earlier CGPs used to inject inadvertent power to the grid and GRIDCO availed the benefits of inadvertent power. GRIDCO also used to pay the hydro pool cost towards the inadvertent power. However, from FY 2019-20 onwards GRIDCO has stopped making payment towards inadvertent injections. Hence, OPTCL become the ultimate beneficiary of such injection of inadvertent power. We pray to Hon'ble Commission to direct OPTCL to submit the detail list of inadvertent injection for each month by each CGP and consider the same as an additional injection to the grid accordingly calculate the transmission loss. The data of inadvertent injection is available with OPTCL and SLDC for each month for each CGP who are connected to EHT transmission system of OPTCL. The entire stakeholder and consumers of Odisha will be benefitted by such methodology as the intra-state transmission loss will reduce significantly.

**Open Access Charges:**

In order to have an insights on the loading of existing transmission systems corresponding to the system peak demand of 6927.78 MW as touched in the month of June 2024. Each year Hon'ble OERC informed OPTCL to submit 400 kV, 220 kV, 132 kV Power Transformer and EHT lines loading. OPTCL should make a practice to submit the Power flow data for 400 kV, 220 kV line and 132 kV line and its loading and the entire Auto-transformer loading, Power Transformer and ICT loading along with the ARR application. Moreover by only submitting only power transmitted on the peak demand day will not solve the purpose. In order to ascertain the margin availability, OPTCL may be directed to submit the maximum power handling capability, power flow and % loading of all the 400 kV, 220 kV, 132 kV line and Power Transformer, Auto Transformer, ICT Transformers. It is also desired that OPTCL should conduct load flow analysis to handle around 2000-3000 MW differential load in appropriate manner.

Once these data are made available, it can be ascertained that, there are sufficient margin is available in the transmission network and in order to utilize it fully, STOA should be promoted and the charges for the same may be kept at 1/4 of the MTOA and LTOA charges and necessary amendments in the regulations may be made.



CP  
SLDC





**8. Introduction of Reactive Energy Charges:**

OPTCL has proposed to introduce Reactive Energy Charges of 3 Paise / KVARh which is very high and should be reduced in consultation with various stakeholders.

**9. Levy of Grid Support Charge for connectivity:**

OPTCL has submitted an application to the Hon'ble OERC on 26.06.2024, to determine and approve the imposition of Grid Support Charges for industries with Captive Generating/Cogeneration plants that operate alongside the OPTCL grids.

The case was registered as OERC Case No.-44/2024. In an order dated July 6, 2023, the High Court suggested that if OPTCL wishes to pursue the imposition of Grid Support Charges, they should file a separate application with the OERC. The court emphasized that the OERC, under Section 181 of the Electricity Act, should examine the justifiability of such charges. Hon'ble Commission in order dated 09.07.2024 in case no 44 of 2024 has directed OPTCL to submit a consolidated report considering certain queries. Therefore, the proposal of OPTCL to levy of Grid Support Charge for FY 2025-26 for connectivity may be rejected.

The Hon'ble commission may consider our views and accordingly pass appropriate

**PRAYER**

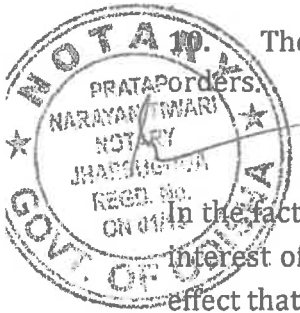
In the facts and circumstances stated above and in the interest of the parties and the larger interest of the State the Hon'ble Commission be pleased to pass appropriate orders to the effect that

1. ARR of OPTCL may be approved accordingly based on the submission made above.
2. The Transmission Charges should be reduced substantially.
3. Transmission loss to be reduced after prudence check for FY 2025-26.
4. Proposal of Reactive energy charges of 3 paise/KVARh should be reduced.
5. Proposal of OPTCL to levy of Grid Support Charge for connectivity may be rejected.
6. Each year truing up exercise and business plan approval should be carried out by Hon'ble commission through a process of public hearing

**For M/s. Bhushan Power and Steel Limited**

**Date: 15.01.2025**

**Authorized Signatory**



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BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur  
Bhubaneswar-751021

Case No: 93/2024  
Filing No: 1

IN THE MATTER OF:

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022

... Applicant

AND

M/s. Bhushan Power and Steel Limited, having manufacturing unit at P.O-Lapanga, P.S- Thelkoloji, Teh-Rengali, Sambalpur, Odisha-768212, Email: [rakesh.pujari@jsw.in](mailto:rakesh.pujari@jsw.in)

... Respondent

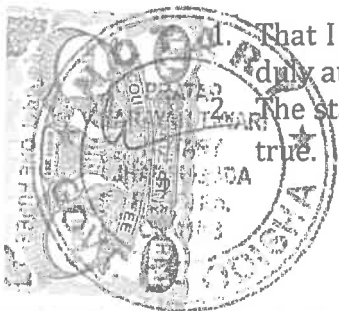
BEFORE PRATAP NARAYAN TIWARI  
NOTARY JHARSUGUDA  
REGD. NO. ON-01/13  
SL NO... 23 DT. 15.1.25

Affidavit verifying the application

I, Mr. Rakesh Kumar Pujari aged about 53 years, working as GM-Legal of M/s. Bhushan Power and Steel Limited having manufacturing unit at P.O-Lapanga, P.S- Thelkoloji, Teh-Rengali, Sambalpur, Odisha-768212 do hereby solemnly affirm and state as follows: -

That I am working as GM-Legal at M/s. Bhushan Power and Steel Limited and I am duly authorized to swear this affidavit on its behalf.

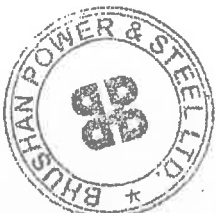
The statements made herein now are based on information and I believe them to be true.



DATE: 15.01.2025

*Pratap Narayan Tiwari*  
15.1.25

*Rakesh Pujari*  
DEPONENT



PRATAP NARAYAN TIWARI  
NOTARY JHARSUGUDA  
REGD. NO. ON-01/13  
MOB. No.- 9437345360

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**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur  
Bhubaneswar-751021**

**Case No: 93/2024**

**Filing No: 1**

**IN THE MATTER OF:**

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**AND**

**IN THE MATTER OF:**

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022



**... Applicant**

**AND**

M/s. Bhushan Power and Steel Limited, having manufacturing unit at P.O-Lapanga, P.S-Thelkoloji, Teh-Rengali, Sambalpur, Odisha-768212, Email: [rakesh.pujari@jsw.in](mailto:rakesh.pujari@jsw.in)

**...Respondent**

*M. Pujari*

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**Letter of Authorization**

I, Mr. Rakesh Kumar Pujari, S/o Binaya Kumar Pujari, aged 53 years is the authorized signatory of M/s. Bhushan Power and Steel Limited hereby authorize Sri Bibhu Swain residing at K-8-82, Kalinga Nagar, Ghatikia, Bhubaneswar-751029, Email: pwrth@gmail.com, Phone-9437155337 to be my representative to present the above case on my behalf before the Hon'ble Odisha Electricity Regulatory Commission relating to my above objection and to submit any additional objection, memos, documents etc. as may be required and in general do all such thing as may be required in connection with the above objection.



**For M/s. Bhushan Power and Steel Limited**

**Date: 15.01.2025**

**Authorized Signatory**



**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
PLOT NO. 4, CHUNAKOLI, SAILESHREE VIHAR,  
CHANDRASEKHARPUR, BHUBANESWAR-751021**

**CASE NO. 93/2024  
FILING NO. 3**

**IN THE MATTER OF:** (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**And**

(ii) Truing up application for the FY 2023-24 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

**AND**

**IN THE MATTER OF:** Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

..... Applicant

**vrs**

**M/s. Bhushan Power and Steel Limited, P.O- Lapanga, PS- Telkoloi, The- Rengali, Sambalpur, Odisha-768212 and 15 others.,**

..... Objectors

**Rejoinder to the objections raised by the Objector M/s. Bhushan Power and Steel Limited.**

**The humble applicant above named**

**MOST RESPECTFULLY SHEWETH:**

1. That the Objector M/s. Bhushan Power and Steel Limited vide affidavit dated 15.01.2025 has raised certain submissions on ARR & Transmission Tariff Application



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of OPTCL for FY 2025-26 and Truing up application for the FY 2023-24. In reply, OPTCL submits its rejoinder to the submissions in the following paragraphs.

**Rejoinder to Para 3:**

**Determination of Transmission Charges:**

The Transmission infrastructures are created considering the demand and request of the DISCOMs from time to time, after due approval from the Hon'ble OERC through Transmission Plan. Being a Transmission License, OPTCL has always endeavored to create the Transmission infrastructure for providing reliable and quality power to the consumers of DISCOMs. Accordingly, every year OPTCL is adding more transmission assets to meet the requirement of DISCOMs. Transmission Charge is arrived at 36.08 paise per unit by dividing the total ARR of OPTCL with the recent realistic MU projections of DISCOMs and recovered from them on a monthly basis. This rate will decrease if DISCOMs drawal increase. Alternatively, OPTCL is proposing to recover the Transmission charges on a monthly basis, based on the recent realistic MU projections of DISCOMs, **irrespective of the drawal.**

The proposed Transmission Charge of 36.08 p/u has been derived by considering the recent realistic energy demand projections of 38764.29 MU as communicated by the DISCOMs & other LTOA customers and the ARR figures have been arrived by OPTCL justifying component wise projections as per the provisions contained in OERC Transmission Tariff Regulations, 2014, OPTCL's Audited Accounts for FY 2023-24, all relevant data/information and materials. The details of projections are submitted in page 51-52 of the present ARR application of OPTCL for FY 2025-26. Moreover, OPTCL had furnished all requisite information and details as per the prescribed formats of the Hon'ble Commission with full justifications.

Hence, mere apprehension of the respondent towards imposition of excessive burden on Discoms seems to be inappropriate and unacceptable which is likely to be rejected at this juncture. Moreover, the contention of the stake holder operating in the value chain of electricity needs to appreciate the fact that the cost recovery has to be in full so as to make the sector sustainable.

Hence, OPTCL does not agree with the views of the Objector.

**Rejoinder to Para 4 to 6:**

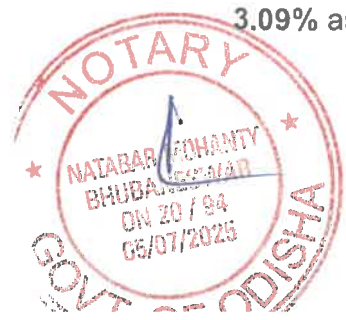
**Transmission Loss**

First of all, the proposal to approve transmission loss of OPTCL at 2.5% is baseless and without any study.

The actual transmission loss for the period **Apr' - Sep' 2024** is calculated to be **3.09%** as shown in the ARR & TT application for FY 2025-26 (page-229). This figure is

*Prabir Kumar Mallick*

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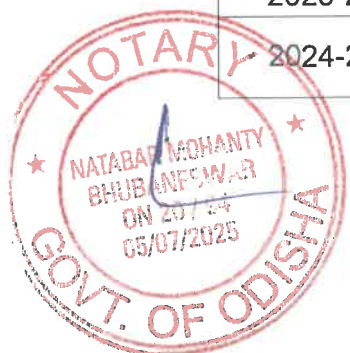
less than the actual transmission loss during last year i.e. 3.11% for. FY 2023-24. In fact, OPTCL had projected Transmission loss of 3.05% for FY 2024-25, but Hon'ble Commission had set a target of 3.00% which could not be achieved yet.

In OPTCL system, the transmission loss is purely technical loss and a function of real time injection of power by a number of generators, system configuration and power flow requirements at different load centers. It depends on many parameters / factors such as distance and mismatch between generation and load centers, types of load, reactive power compensation, voltage profile, seasonal variation of demand load etc. Thus, OPTCL does not have much control over the same at any point of time. The transmission system of OPTCL operates as an integral part of the Eastern Region Grid to serve the internal demand of the State as well as to carry out import and export of power depending upon the system demand.

As of the matter of fact, some grid s/s and lines are being constructed in many remote and deprived areas funded under Central & State Govt. schemes in the interest of public. Additional length in EHT lines and Sub-stations in under-loaded areas are also responsible for increase in transmission loss.

The Transmission Loss in OPTCL network is in a gradually reducing trend over the years i.e. from 3.73% during 2014-15 to 3.11% in 2023-24 and has remained 3.09% within 1<sup>st</sup> six months of FY 2024-25 mainly due to addition of infrastructure and various system strengthening works taken up by OPTCL. The actual losses incurred over the years by OPTCL have been within the margin allowed by Hon'ble Commission up to the year FY 2017-18. However in FY 2018-19, the commission set the loss at 3.00% though the projected transmission loss was at 3.25% and thereafter the commission has been pegging the transmission loss at the same level though loss projected by OPTCL remained in a downward trend.

Year	Tr. Loss proposed	OERC Approval	Actual
2014-15	3.75%	3.75%	3.73%
2015-16	3.75%	3.75%	3.67%
2016-17	3.70%	3.70%	3.58%
2017-18	3.50%	3.50%	3.34%
2018-19	3.25%	3.00%	3.28%
2019-20	3.25%	3.00%	3.25%
2020-21	3.20 %	3.00%	3.22%
2021-22	3.15%	3.00%	3.18%
2022-23	3.10%	3.00%	3.15%
2023-24	3.10%	3.00%	3.11%
2024-25	3.05%	3.00%	3.09% (1 <sup>st</sup> six months )



From the table given above, it is also clear that each year upto FY 2017-18, the transmission loss achieved by OPTCL has remained at a level lower than the approved figures by Hon'ble commission and from FY 2018-19 the target set by OERC appears to be very stiff which was hard to achieve though **the trend of lesser transmission loss year after year has been achieved.**

That the transmission losses depend upon the voltage level at which the power is transmitted. The transmission losses are higher where the percentage of lower voltage (132kV or below) transmission system is higher. A comparison of the average transmission losses of a few state transmission licensees and their corresponding transmission assets at low voltage level (132 kV) is shown below.

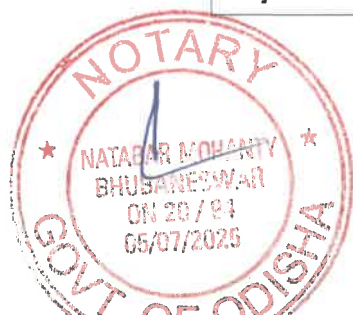
**TRANSMISSION LOSS (%) OF OTHER STATES OF LOW VOLTAGE LINES  
UPTO 132KV FOR FY 2023-24**

States	% of Low voltage Lines (up to 132 kV)			Actual Transmission Losses for FY 2023-24 (%)
	Transmission Lines up to 132kV (Ckm)	Total Transmission Lines (Ckm)	% of Transmission Lines up to 132kV	
<b>Odisha (OPTCL)</b>	8479.831	16508.068	51.36%	3.11
<b>Uttar Pradesh (UPPTCL)</b>	28733	60145	47.77%	3.22
<b>Gujarat (GETCO)</b>	44512	73054	60.93%	3.83

It may be kindly be appreciated that the transmission loss (technical) is bound to happen as per law of physics and is very difficult to reduce after a certain level. Also, at all India level, the transmission loss of utilities have remained at more than 3.00% and to suffice our view point the table is given below for kind appreciation of Hon'ble Commission.

**Transmission loss of Different states for FY 2023-24**

Name of states	Tr. loss approved by State Commission	Actual Tr. loss
Uttar Pradesh (UPPTCL)	3.22%(UERC)	3.22%
Gujarat (GETCO)	3.60% (GERC)	3.83%
Assam (AEGCL)	3.30%(AERC)	3.30%
Rajasthan (RVPN)	4.50%(RERC)	4.23%





Himachal Pradesh (HPPTCL)	3.19% (HERC)	3.25%
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All India average transmission loss for the period 06-01-2025 to 12-01-2025 as published by Grid Controller Of India Limited, National Load Despatch Centre dated 18.01.025 is 4.00 %. Further, as per the CEA General Review 2024 (Containing Data for the Year 2022-23) the transmission loss of Eastern Region is 3.37% (attached as **Annexure-01**). Present transmission loss level of OPTCL is much less than both the said cases (i.e. Grid Controller Of India Limited & CEA General Review 2024).

However, as a responsible Transmission utility, OPTCL is making an all-out effort to reduce the transmission loss further by undertaking various **system operation and loss reduction measures** by implementing the emerging technologies like **system Automation**, load bifurcation, **modification in system configuration**, procurement of more efficient equipment, **Digitalization of grids** by using SAS, Protection system improvement using Busbar protection and Event Logger, **Conversion of Radial to Ring system**, Advanced Metering Infrastructure etc. to bring it to **3.05% by FY 2025-26**.

**Regarding inadvertent power**

OPTCL does not agree to the assumption of the respondent that around 985MU of inadvertent power will be injected in OPTCL system in a year considering the CGP capacity 9850MW. In this regard it is submitted that during the last six months, it is observed that total inadvertent power injection is 239.38MU which has been already considered while calculating the Transmission loss of 3.09% in form T-6. Hence, Transmission loss as suggested by the Objector is not just and proper. Details of inadvertent power injected by CGPs in FY 2024-25 till November is attached as **Annexure-02**.

Further, it is submitted that Transmission charge is being computed on Open access transactions based on scheduled energy. Hence, OPTCL does not reap any benefit out of inadvertent power.

**Steps taken for Energy Audit**

Around 2600 nos. of 0.2s Accuracy Class ABT Energy meters are required for different metering points at all Grid Substations of OPTCL for billing and audit purposes. 538 nos. of meters have been installed by OPTCL at different metering points. 2000 nos. energy meters will be installed at different Grid Substations under SAMAST Project, out of which 70 nos. meters have been installed and the installation process of balance meters are in progress. The installation of energy meters for balance metering points under **SAMAST** Project will be completed by 31st October



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2025. After installation of the meters, energy audit and calculation of transmission losses of OPTCL on an element-wise at different voltage levels will be feasible.

**Rejoinder to Para 7:**

**Open Access Charges:**

That the system peak demand of 6927.78 was touched on dated.19.10.2024. Statement on the loading pattern of the existing transmission system (400kV, 220kV, 132kV power transformers and EHT lines) corresponding to the peak demands is attached as **Annexure-03**. OPTCL has already conducted load flow study considering different load scenario i.e Summer peak, Winter lean, High hydro, Low Hydro & Solar Peak, in the Revised 14th Intra-state Transmission Plan of Odisha for FY 2022-23 to FY 2026-27, which has been approved by Hon'ble Commission vide case no. 08/2024. In the aforesaid report percentage loading of all Transmission line, ICT, Auto & Power Transformers till FY 2026-27 have been mentioned. The Transmission infrastructures are created considering the demand and request of the DISCOMs from time to time, after due approval form the Hon'ble OERC through Transmission Plan and the DISCOMs and other LTOA customers are responsible to bear the full approved ARR of OPTCL. STOA charges is being charged as per the Open Access Regulations, 2020.

**Rejoinder to Para 8:**

**Reactive Energy Charges:**

As per Regulation 31(1) under Chapter-7 (IMBALANCE AND REACTIVE ENERGY CHARGES) of the OERC (Terms and Conditions of Intra-State Open Access) Regulations, 2020, payment for the reactive energy charges by open access consumers shall be in accordance with provisions stipulated in the State Grid Code or as may be specified in relevant regulations/orders of the Hon'ble Commission .

The Hon'ble Commission in Para 16 (page 5) of the order dated 05.02.2019 in Case No. 50/2017 has inter alia viewed that the provisional reactive energy charges of 3 paise/KVARh as allowed in the ARR order of OPTCL for FY 2018-19 continue for time being till a final justification is submitted by OPTCL in consultation with the stakeholders. However, OPTCL **has not realized any revenue** from Reactive Energy Charges so far.

In view of the above, OPTCL proposes that 3paise/KVARh may be approved provisionally as Reactive Energy Charges for FY 2025-26.

Hence, the proposal of objector to reduce the reactive energy charges as suggested by OPTCL is not just and proper.



**Rejoinder to Para 9:**

**Levy of Grid Support Charge for connectivity:**

The benefits derived by the CGPs with co-located loads are enormous. The benefits are in the nature of ancillary services which are not paid till now. The Grid support charges (GSC)/Parallel operation charge has been levied by different state Regulatory Commissions and upheld by APTEL and Supreme Court of India through various orders and hence proposed by OPTCL through a separate petition. Recently, OPTCL had filed an application (case No. 44 of 2024) on 26.06.2024 for determination and approval for levy of Grid Support Charges for industries having Captive Generating / Cogeneration plants and running in parallel with the Grids of OPTCL. Hon'ble Commission in its order directed OPTCL to submit a consolidated report considering the observations/queries raised by the stakeholders in the earlier Cases filed by OPTCL. In compliance to above, OPTCL is in final stage of preparation of the required consolidated report and will be submitted before Hon'ble Commission shortly.

2. The objections not specifically admitted may be deemed to have been denied.

**PRAYER**

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of M/s. Bhushan Power and Steel Limited while approving ARR and Transmission Tariff of OPTCL for FY 2025-26 & Truing up application for the FY 2023-24.

Bhubaneswar  
January 31, 2025

By the Applicant  
Through

*Prabbeer Kumar Mallik*

Sr. GM (El.), RT&C



Annexure-01

**Table 6.2**  
**Regional Transmission Losses**  
**Utilities**  
**2022-23**

Region	Energy Available in the Region (GWh)	Export to other Region (GWh)	Export to Nepal (GWh)	Export to Bangladesh (GWh)	Export to Bhutan (GWh)	Export to Myanmar (GWh)	Total Energy drawal by States/Utilities (GWh)	Transmission Losses (GWh)	Transmission Losses (%)
1	2	3	4	5	6	7	8	9 (2-3-4-5-6-7)	10((8/2)x100)
Northern Region	235784.74	3399.70	343.64	0.00	0.00	0.00	224171.69	7869.71	3.34
Western Region	282367.53	57344.05	0.00	741.34	0.00	0.00	215219.30	9062.84	3.21
Southern Region	173393.55	7625.46	0.00	3491.13	0.00	0.00	156314.82	5962.13	3.44
Eastern Region	134352.68	57191.16	314.03	7547.70	266.30	0.00	64506.41	4527.08	3.37
North Eastern Region	21117.54	4662.00	0.00	1039.50	38.47	9.81	14499.49	868.27	4.11

STATEMENT OF FREE POWER OF CGPS FY 2024-25

SL. No.	CGP Stations	STATEMENT OF FREE POWER OF CGPS FY 2024-25												TOTAL Injected (In Kwh)
		APRIL'24 Injected (In Kwh)	MAY'24 Injected (In Kwh)	JUN'24 Injected (In Kwh)	JULY'24 Injected (In Kwh)	AUG'24 Injected (In Kwh)	SEPT'24 Injected (In Kwh)	OCT'24 Injected (In Kwh)	NOV'24 Injected (In Kwh)	TOTAL Injected (In Kwh)				
1	IMFA	9,64,093	8,71,590	9,66,013	6,90,482	6,60,805	8,44,052	11,81,938	8,61,089	70,40,062				
2	NALCO	10,68,227	11,48,265	82,715	3,79,525	1,19,400	2,91,407	7,95,571	3,54,861	42,39,971				
3	ARATI STEELS	8,62,606	9,17,113	7,95,889	8,37,134	9,54,267	7,77,542	12,32,834	4,38,520	68,15,905				
4	Aryan Ispat Ltd.	1,89,004	75,496	94,374	1,28,766	75,923	1,18,270	1,13,984	93,094	8,88,911				
5	BPSL	55,93,922	73,91,485	59,86,547	47,02,977	55,65,774	84,85,797	73,22,641	56,03,633	5,06,52,776				
6	TATA BSL(BSL)	1,04,87,992	80,79,802	1,02,02,963	1,00,97,489	59,31,643	69,64,899	1,07,69,509	78,60,310	7,03,94,607				
7	DINABANDHU	-	-	28,262	5,86,618	7,74,738	6,15,824	3,96,009	4,16,635	28,18,086				
8	HINDALCO	12,76,300	13,30,670	13,48,750	14,65,620	15,47,850	13,96,940	14,27,620	15,00,550	1,12,94,300				
9	IFFCO	730	210	480	1,990	31,380	55,630	4,700	140	95,260				
10	JSL	10,68,260	10,39,500	12,65,930	8,91,100	7,64,870	7,70,640	9,64,040	11,83,350	79,47,690				
11	JSPL	37,70,844	28,08,670	34,11,545	54,03,917	9,81,356	23,35,330	40,58,051	83,47,885	3,11,17,598				
12	BPPL	1,30,416	1,35,928	1,54,348	2,60,512	3,73,954	8,90,365	1,78,372	1,78,372	23,49,311				
14	MAITHAN	14,48,004	9,09,222	4,00,413	6,83,208	10,57,109	9,66,770	10,59,627	7,65,805	72,90,158				
15	NARBHERAM	2,01,659	58,238	1,03,200	-	56,914	2,25,360	1,47,510	2,39,699	10,32,680				
16	NINL	5,028	31	26,323	96,865	5,696	95,165	11,240	3,849	2,44,197				
17	MGM	1,82,571	1,45,479	2,35,893	2,52,226	2,21,855	2,06,940	3,12,429	2,19,178	17,76,571				
18	NAVA LTD.	4,20,921	4,75,773	6,19,574	5,63,073	7,28,331	5,59,808	4,39,361	5,28,169	43,25,010				
21	DALMIA CEMENT (OCL)	2,99,204	3,75,083	2,94,627	3,14,046	1,72,849	3,16,147	2,67,925	2,33,407	22,73,288				
22	Debtor (Dalmia Kapilas)	66,891	69,910	60,865	80,334	1,19,485	1,63,380	86,986	65,883	7,13,734				
23	PATNAIK STEEL	2	1	1	-	14	-	460	5	483				
24	RSP	3,45,754	1,88,727	1,65,840	8,04,091	1,12,952	4,43,299	5,56,802	3,34,735	29,52,200				
25	MSP METALICS	1,59,426	-	75,880	1,66,416	1,11,304	1,39,010	1,22,197	1,67,099	9,41,332				
26	SHYAM METALICS	1,38,910	2,80,040	74,430	1,94,760	1,21,420	1,68,600	38,210	1,57,180	11,73,550				
27	TATA SPONGE	2,29,645	2,60,280	1,46,805	2,05,081	3,30,178	4,44,025	2,84,981	3,81,790	22,82,785				
28	VAL JHARSUGUDA	2,30,917	3,43,139	2,62,600	2,42,700	2,30,926	4,54,063	5,40,147	3,10,124	26,14,616				
29	VAL LANJIGARH	2,75,100	4,13,860	6,10,070	7,13,440	6,33,460	7,86,250	8,79,780	6,37,430	49,49,410				
30	VISA	7,71,061	10,05,163	9,47,300	9,47,300	30,61,941	12,17,292	14,18,462	12,09,048	96,30,267				
31	OSISL	7,65,935	4,69,738	3,29,024	2,69,420	5,23,439	3,70,361	5,48,210	3,71,584	36,47,711				
34	SHREE GANESH	1,00,210	1,55,053	2,54,522	3,41,391	4,46,352	4,17,582	4,09,942	10,46,114	31,71,166				
35	FACOR	2,65,677	5,50,814	7,41,583	8,52,098	6,34,255	7,53,202	8,37,072	7,47,334	53,82,035				
36	ADITYA/ LAPANGA	6,78,480	8,25,910	8,25,390	7,56,250	8,02,740	7,21,920	8,59,310	7,69,820	62,39,820				
37	Arcelor Mittal Nippon Steel	4,772	90,245	99,500	1,11,325	65,628	29,951	55,182	58,708	5,15,311				
38	BEL	2,10,320	2,69,476	2,62,673	2,75,829	2,49,068	1,95,433	2,25,838	1,87,062	18,75,699				
40	Viraj steel	6,27,076	8,91,557	8,63,335	11,05,979	7,99,391	62,967	5,69,458	5,82,286	54,92,049				
41	RUNGTA MINES DSP	30,64,885	34,10,700	31,31,957	33,01,927	26,70,196	33,64,501	33,82,666	27,08,923	2,50,35,755				
42	Rungta mines(Badbil)	5,57,936	6,40,070	5,87,227	3,86,202	2,21,501	4,01,154	3,09,846	4,97,457	36,01,393				
43	Runga mines(Kamanda steel ltd.)	12,15,441	1,23,304	1,604	16,842	2,98,357	3,89,125	44,787	18,658	21,08,118				
44	SMC JHARSUGUDA	4,28,253	5,30,964	5,23,235	5,29,910	4,82,823	4,82,690	6,53,972	2,05,400	37,79,250				
45	SMC BADMAL	2,11,681	1,87,531	4,95,099	4,79,752	4,71,241	4,71,241	4,18,625	2,30,510	28,63,432				
46	ABREL	35,599	53,714	33,667	42,270	38,116	38,364	35,739	27,841	3,05,310				
47	KJS ALUWALIA	2,42,458	26,81,937	8,05,113	10,75,172	3,71,659	6,54,355	11,680	58,42,374					

48	SHREE CEMENT	43,307	77,558	1,48,698	1,72,642	2,11,054	2,05,650	1,46,729	93,075	10,98,813
49	JAGANNATH POWER	4,31,538	6,59,109	7,10,884	8,95,731	9,60,536	4,04,745	6,09,344	7,82,263	54,54,150
50	ABREL KHAJURIAKATA	7,74,171	55,849	45,539	74,081	72,652	56,116	50,496	44,857	11,73,761
51	THAKUR PRASAD					7,00,673	1	5	1	7,00,680
53	ADHUNIK METALICS								5,93,528	5,93,528
54	OCL								5,70,453	5,70,453
	TOTAL CGP	3,98,45,226	3,73,05,387	4,00,96,511	4,01,69,132	3,54,10,340	3,84,69,467	4,44,70,009	4,15,39,394	31,73,05,466
	TOTAL (MU)	39.85	37.31	40.10	40.17	35.41	38.47	44.47	41.54	317.31

Loading pattern corresponding to the peak demand of 6928 MW (including Vedanta drawal) on 19-JUNE-2024 AT 16:00 hrs			
FEEDER NAME	MW	Rated Capacity in MW	% Loading
400KV MENDHASAL - PANDIAVAL2	50.43		
400KV MERAMUNDALI-BOL_PG	0.00		
400KV MERAMUNDALI-KANIHA1	-637.76		
400KV MERAMUNDALI-KANIHA2	-385.39		
400KV INDRAVATI ICT1	-67.47		
400KV INDRAVATI ICT2	-66.91		
400KV MERAMUNDALI-BOL_PG	0.00		
400KV DUBNW- KALABADIA	-368.96		
400KV_OPGC-JHARS_PG - 1	230.36		
400KV_OPGC-JHARS_PG - 2	150.50		
MENDHASAL -PANDIAVIL 1	49.34		
DUBNW- PANDIAVAL	75.67		
VEDANTA-JHARSUGUDA1 PG	-40.51		
VEDANTA-JHARSUGUDA2 PG	-40.23		
220KV JODA-JAMSHEDPUR	5.54	192	3%
220KV JODA-RAMCHANDRAPUR	-156.72	192	86%
KATAPALLI2-BOLAN PG	0.00	192	0%
SADEIPALLI2-BOLAN PG	-127.65	192	70%
220KV RENGALI-RENGALI PG 1	24.96	192	14%
220KV RENGALI-RENGALI PG 2	9.33	192	5%
220KV RENGALI-KANIHA	-132.61	192	73%
220KV TTPS-KANIHA	136.08	192	75%
220KV MERAMUNDALI-KANIHA 1	-107.71	192	59%
220KV MERAMUNDALI-KANIHA 2	-103.58	192	57%
220KV JAYANAGAR-JEPORE PG 1	-22.71	192	12%
220KV JAYANAGAR-JEPORE PG 2	-23.86	192	13%
220KV BUDHIPADAR-KORBA 1	-4.14	192	2%
220KV BUDHIPADAR-KORBA 2	-2.92	192	2%
220KV BUDHIPADAR-KORBA 3		192	0%
220KV TARKERA-BISRA 1	-201.68	350	61%
220KV TARKERA-BISRA 2	-205.17	350	62%
132KV KALABADIA-BANGIRIPOSI	62.92	76	87%
132KV KALABADIA-BARIPADA	66.95	76	93%
220KV KALABADIA-BALASORE 1	176.81	192	97%
220KV KALABADIA-BALASORE 2	177.28	192	97%
NET - KALABADIA DRAWL	-916.91		
ATRI_AUTO-1	98.39	160	65%
ATRI_AUTO-2	98.61	160	65%
BALAS AUTO1	-77.17	160	51%
BALAS AUTO2	-76.75	160	50%
BALAS_AUTO-3	-76.34	160	50%
BHADR AUTO1	0.00	100	0%
BHADR AUTO2	91.01	160	60%
BHADR_AUTO-3	91.84	160	60%

BHANJ AUTO1	53.54	160	35%
BHANJ AUTO2	47.17	160	31%
BIDAN AUTO1	-54.85	100	58%
BIDAN AUTO2	0.00	100	0%
BIDAN AUTO3	23.75	160	16%
BOLNW AUTO1	67.28	160	44%
BOLNW AUTO2	70.89	160	47%
BOLNW_AUTO-3	66.65	160	44%
BUDHI AUTO1	92.49	160	61%
BUDHI AUTO2	52.98	160	35%
BURLA AUTO1	35.41	100	37%
BURLA AUTO2	35.34	100	37%
BURLA_AUTO-3	53.04	160	35%
CHAND AUTO1	56.32	100	59%
CHAND AUTO2	97.51	160	64%
CHAND AUTO3	60.82	100	64%
CHAND AUTO4	94.03	160	62%
DUBURI AUTO1	58.66	160	39%
DUBURI AUTO2	56.70	160	37%
DUBURI AUTO3	37.08	100	39%
GODA_AUTO-1	30.13	160	20%
GODA_AUTO-2	30.47	160	20%
JAYAN AUTO1	47.72	160	31%
JAYAN AUTO2	40.76	160	27%
JODA AUTO1	64.76	160	43%
JODA AUTO2	65.89	160	43%
JODA AUTO3	53.73	100	57%
LAPAN_AUTO-1	81.15	160	53%
LAPAN_AUTO-2	81.07	160	53%
MERAM AUTO1	39.55	100	42%
MERAM AUTO2	38.57	100	41%
MERAM AUTO3	37.43	100	39%
NAREN AUTO1	0.00	160	0%
NAREN AUTO2	0.00	160	0%
NAREN AUTO3	0.00	100	0%
PARAD AUTO1	-46.12	100	49%
NAYAG POWXFMR1	22.55		
NAYAG POWXFMR2	13.44		
NAYAG POWXFMR3	-22.16		
TATAPOWER1	-4.60		
TATAPOWER2	-2.02		
VAL DRAWAL	-959.45		
VEDANTA IPP	499.41	600	88%
ATRI-PANDIAVIL-1	-107.98	192	59%
BHOGRAI-KUCHEI	-29.34	76	41%
JALESWAR-KUCHEI	-40.58	76	56%
ADITYA_LOAD	0.00		
INFA-THERU	37.25	76	52%
ATRI-PANDIAVIL-2	-108.85	192	60%
220KV_KJHAR_GR -KEONJ_PG - 1	-11.58		



220KV_KJHAR_GR -KEONJ_PG - 2	-11.75		
LAXMIPUR_POWER TRANSFORMER	2.97	20	16%
PARAD AUTO2	-74.20	160	49%
PARAD AUTO3	-67.87	160	45%
TARKE AUTO1	50.91	100	54%
TARKE AUTO2	52.13	100	55%
TARKE AUTO3	51.04	100	54%
TARKE AUTO4	0.00	100	0%
THERU AUTO1	-22.22	100	23%
THERU AUTO2	21.45	100	23%
TTPS AUTO1	411.78		
TTPS AUTO2	0.00		
BOLNW_BOLAN_PG-2	-127.65	192	70%
132 KV ANAND_BAITARANI PWR	-0.03		
220 KV_ NAREN_TATA GOPALPUR FDR-1	0.00	192	0%
220 KV_ NAREN_TATA GOPALPUR FDR-1	3.32	192	2%
220 KV_ JAYAN_JEYPO FDR-3	-20.90	192	11%
220 KV_ JAYAN_JEYPO FDR-4	-23.87	192	13%
KESINGA - BOLANGIR PG	-60.98	192	33%
PRATAPSASAN-PANDIAVIL - 1	-111.61	192	61%
PRATAPSASAN-PANDIAVIL - 2	-111.83	192	61%
220 BUDHIPADAR - SMC 1	-13.22	192	7%
132 LAPAN - SMC	21.64	76	30%
132KV JODA-KENDUPOSI	22.42	76	31%

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BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur  
Bhubaneswar-751021

Case No: 93/2024

Filing No: 1

IN THE MATTER OF:

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022

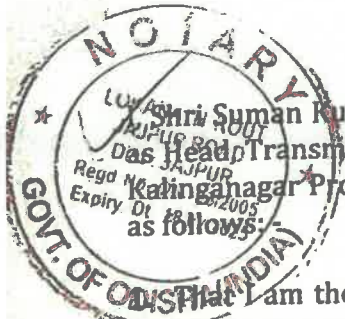
... Applicant

AND

M/s. Tata Steel Limited, Kalinganagar Industrial Complex, Duburi, JK Road, Dist-Jajpur, PIN-755026

...Respondent

Affidavit verifying the application



Sri Suman Kumar Sharma, Son of Sri Anil Kumar Sharma aged about 37 years, working as Head, Transmission & Distribution, Electrical Maintenance with M/s. Tata Steel Limited, Kalinganagar Project, Duburi, JK Road, Jajpur-755026 do hereby solemnly affirm and state as follows:

1. I am the Head, Transmission & Distribution, Electrical Maintenance of M/s. Tata Steel Limited and I am duly authorized to swear this affidavit on its behalf.
2. The statements made in the petition are based on information and I believe them to be true.



PLACE: Bhubaneswar

DATE: 15/01/2025

Advocate appears before me on dt. 15/01/2025 at about 4.00 P.M. and states on oath that the contents of this affidavit are true to the best of his/her knowledge.

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Signature of Notary  
NOTARY  
GOVT OF ODISHA  
KALINGANAGAR ROAD  
JAJPUR

Signature of Respondent  
Suresh Chandra Sharma  
Head (Electrical Maintenance)  
Transmission & Distribution  
Tata Steel, Kalinganagar

**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION**  
**Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur**  
**Bhubaneswar-751021**

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**AND**

**IN THE MATTER OF:**

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022

**...Applicant**

**AND**

M/s. Tata Steel Limited, Kalinganagar Industrial Complex, Duburi, JK Road, Dist-Jajpur, PIN-755026

**...Respondent**

**Letter of Authorization**

I, Shri Suman Kumar Sharma, Son of Sri Anil Kumar Sharma aged about 38 years, working as Head, Transmission & Distribution, Electrical Maintenance with M/s. Tata Steel Limited, Kalinganagar Project, Duburi, JK Road, Jajpur-755026 hereby authorize Sri Bibhu Swain, residing at K-8-82, Kalinga Nagar, Ghatikia, Bhubaneswar-751029 to be my representative to present the above case on my behalf before the Hon'ble Odisha Electricity Regulatory Commission relating to my above reply and to submit any additional submission, memos, documents etc. as may be required and in general do all such thing as may be required in connection with the above reply.

**For M/s. Tata Steel Limited**

**Place: Bhubaneswar**

**Date: 15.01.2025**

**Authorized Signatory**

*Suman Kumar Sharma*

**Suman Kumar Sharma**  
Head (Electrical Maintenance)  
Transmission & Distribution  
Tata Steel, Kalinganagar

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**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION**  
**Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur**  
**Bhubaneswar-751021**

Case No. 93/2024

Filing No: 1

**IN THE MATTER OF:**

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**AND**

**IN THE MATTER OF:**

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022.

... Applicant

**AND**


**IN THE MATTER OF:**

M/s. Tata Steel Limited, Kalinganagar Industrial Complex, Duburi, JK Road, Dist-Jajpur, PIN-755026

...Respondent

**The humble respondent above named most respectfully submit as under:**

1. That M/s. Tata Steel Limited, a company incorporated under the provisions of the Companies Act, 1956 having its Registered Office at Bombay House, 24-Homi Mody Street, Fort, Mumbai 400001 and plant site-cum-correspondence office at Kalinga Nagar Industrial Complex, Duburi, JK Road, Jajpur 755026 hereinafter referred as "TSL" / "Respondent".
2. That TSL has set-up 3 Million Ton per Annum capacity in the first phase and is in the process of second phase expansion of the Integrated Steel Plant to increase the crude steel production capacity to 8 Million Ton per Annum. The Respondent's plant is connected with the New Duburi Grid Substation of OPTCL having a Contract Demand of 150 MVA at EHT supply system.

  
**Suman Kumar Sharma**  
Head (Electrical Maintenance)  
Transmission & Distribution  
Tata Steel, Kalinganagar

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3. That the Respondent Industries under the purview of the Licensee is under Mega Steel Plant Category where electrical power contributes substantially towards the cost of production.
4. TSL is submitting the following points on the application of OPTCL for determination of Annual Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 for kind review and necessary action by the Hon'ble Commission.
5. **Human Resources Expenses:**


The OPTCL has projected Employee Cost expenditure at Rs. 554.05 Crore for FY 2025-26 against Rs. 488.63 Crore as approved by the Commission to be spent during FY 2024-25. The summary of Employee Expenses of OPTCL for the last fourteen financial years is furnished below.

**Summary of Employee Expenses**

Financial Year	Proposed	Approved	Actual
2010-11	865.13	279.56	173.11
2011-12	952.06	338.14	279.56
2012-13	655.36	318.48	268.59
2013-14	341.2	289.3	191.70
2014-15	361.38	318.18	309.59
2015-16	310.02	305.23	285.95
2016-17	399.56	292.55	382.44
2017-18	462.33	304.5	380.32
2018-19	419.57	360.4	375.65
2019-20	421.99	419.77	394
2020-21	466.22	415.87	373.19
2021-22	532.73	457.88	474.83
2022-23	526.53	477.19	
2023-24	508.76	449.08	
2024-25	582.06	488.63	
2025-26	554.05		

The cost break-up of the employee expense is provided below:

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**Sunjan Kumar Sharma**  
Head (Finance & Maintenance)  
Transmission & Distribution  
Tata Steel, Kalinganagar

Sl. No	Particulars	Prev. Year 2023-24	Curr. Year 2024-25	Ensuring Year 2025-26
<b>A</b>	<b>Salary &amp; Allowance</b>	<b>1</b>	<b>2</b>	<b>3</b>
1	basic Pay	156.70	156.69	160.16
2	Dearness Allowance	69.32	89.75	97.70
3	House Rent Allowance	23.18	25.07	25.87
4	Medical Allowances	7.51	8.71	8.41
5	Conveyance Expenses (allowance+Reimbursement)	2.84	3.42	3.88
6	Other Allowance	1.28	1.53	1.96
7	Bonus	0.01	0.01	0.01
8	Stipend for New Recruitment	8.49	10.00	10.53
9	Stipend to Apprentice	1.64	3.00	2.74
10	Arrear Salary for Wage Board Revision	-	6.65	-
	<b>Sub-total (A)</b>	<b>270.97</b>	<b>304.83</b>	<b>311.27</b>
<b>B</b>	<b>Additional Employee Cost</b>			
1	Out Sources Engagement	3.46	5.58	6.81
	<b>Sub-total (B)</b>	<b>3.46</b>	<b>5.58</b>	<b>6.81</b>
<b>C</b>	<b>Other Employee Cost</b>			
1	Leave Travel Concession	0.09	0.63	0.63
2	Honorarium	0.09	0.12	0.12
3	Ex-gratia	7.20	5.00	8.84
4	Staff Welfare Expenses	11.07	6.75	10.81
5	Other Employee Cost	0.52	0.02	0.02
6	Capacity Building Charges	1.05	1.02	2.40
	<b>Sub-total (C)</b>	<b>20.02</b>	<b>13.54</b>	<b>22.83</b>
<b>D</b>	<b>Terminal Benefits</b>			
1	Pension	165.77	170.41	175.53
2	Gratuity	11.66	12.01	12.37
3	Leave Salary	14.79	15.16	15.62
4	Other (including contribution to NPS)	21.91	22.62	24.52
	<b>Sub-total (D)</b>	<b>214.12</b>	<b>220.20</b>	<b>228.03</b>
<b>E</b>	<b>Total Employees Cost (A+B+C+D)</b>	<b>508.57</b>	<b>544.15</b>	<b>568.95</b>
<b>F</b>	<b>Less: Employees Cost Capitalised</b>	<b>14.90</b>	<b>14.90</b>	<b>14.90</b>
<b>G</b>	<b>Net Employee Cost ( E- F)</b>	<b>493.67</b>	<b>529.25</b>	<b>554.05</b>

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*Suman Kumar Sharma*  
Suman Kumar Sharma  
Head of HR (Personnel Services)

- **Basic Pay and Grade Pay:** Basic Pay and Grade Pay proposed for FY 25-26 = Rs. **160.16** Cr. is based on actual cash flow for FY 24-25 with additional increment of 3% and average number of employee. OPTCL is planning to recruit 172 Nos. employees during FY 2024-25 and 280 Nos. in FY 2025-26.
- **DA:** OPTCL proposed 61% DA for FY 2025-26, considering Finance Dept guidelines. However, actual increase in DA may be reviewed.
- **HRA:** OPTCL proposed HRA @19%. Actual cash flow may be considered.
- **Outsourcing:** OPTCL is functioning with 50% of manpower and has outsourced services. Accordingly, Rs. 6.81 Cr. has been proposed towards payment to outsourced personnel. The same can be reviewed.
- OPTCL is planning to recruit 172 Nos. employees during FY 2024-25 and 280 Nos. in FY 2025-26 and has proposed Rs.10.53 Cr. towards stipend for the new recruiters. Considering the past trend of recruitment the same may be reviewed.
- Actual addition of employees is lesser than the approved. Stipend and employee cost should be approved by reviewing proposed addition of employees.
- Terminal benefits should be reviewed on actual cash flow basis.

Hence the Employee cost Expenses of OPTCL for FY 2025-26 may be approved accordingly by the Hon'ble Commission.


**6. Repair and Maintenance (R&M) expenses**

That the OPTCL has projected Repair and Maintenance Expenses at Rs. 217.7 Cr for FY 2025-26 against Rs. 135 Crs as approved by the Commission to be spent during FY 2024-25.

The summary of Repair and Maintenance (R&M) expenses of OPTCL for the last fourteen financial years is furnished below.

**Summary of R & M Cost**

<b>Financial Year</b>	<b>Proposed</b>	<b>Approved</b>
<b>2010-11</b>	98.14	<b>60</b>
<b>2011-12</b>	93.89	<b>75</b>
<b>2012-13</b>	95.46	<b>95</b>
<b>2013-14</b>	108.91	<b>60</b>
<b>2014-15</b>	146.77	<b>93</b>
<b>2015-16</b>	154.11	<b>108</b>
<b>2016-17</b>	170.66	<b>110.59</b>
<b>2017-18</b>	155.11	<b>124.97</b>

  
**Suman Kumar Sharma**  
Head (Electrical Maintenance)  
In-charge of Distribution  
132, 133, 134, 135, 136, 137, 138

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<b>2018-19</b>	<b>156.19</b>	<b>111</b>
<b>2019-20</b>	<b>115.22</b>	<b>115.22</b>
<b>2020-21</b>	<b>110.50</b>	<b>115.22</b>
<b>2021-22</b>	<b>151.1</b>	<b>118.61</b>
<b>2022-23</b>	<b>148.04</b>	<b>110.5</b>
<b>2023-24</b>	<b>164.34</b>	<b>135</b>
<b>2024-25</b>	<b>169.3</b>	<b>135</b>
<b>2025-26</b>	<b>217.7</b>	

**7. Administration & General Cost**


That the OPTCL has projected Administrative and General (A&G) expenditure at Rs. 49.8 Crs for FY 2025-26 against Rs. 37.05 Crs as approved by the Commission to be spent during FY 2024-25.

The summary of Administrative and General Expenses of OPTCL for the last fourteen financial years is furnished below.

**Summary of A&G Cost**

<b>Financial Year</b>	<b>Proposed</b>	<b>Approved</b>
<b>2010-11</b>	<b>26.99</b>	<b>15.14</b>
<b>2011-12</b>	<b>38.34</b>	<b>18</b>
<b>2012-13</b>	<b>39.11</b>	<b>21.25</b>
<b>2013-14</b>	<b>23.09</b>	<b>22.39</b>
<b>2014-15</b>	<b>25.46</b>	<b>24.01</b>
<b>2015-16</b>	<b>32.36</b>	<b>24.37</b>
<b>2016-17</b>	<b>25.58</b>	<b>24.66</b>
<b>2017-18</b>	<b>26.11</b>	<b>25.6</b>
<b>2018-19</b>	<b>27.23</b>	<b>26.44</b>
<b>2019-20</b>	<b>28.07</b>	<b>27.55</b>
<b>2020-21</b>	<b>28.66</b>	<b>28.72</b>
<b>2021-22</b>	<b>38.13</b>	<b>30.35</b>
<b>2022-23</b>	<b>43.18</b>	<b>37.73</b>
<b>2023-24</b>	<b>47.07</b>	<b>40.28</b>
<b>2024-25</b>	<b>51.13</b>	<b>37.05</b>
<b>2025-26</b>	<b>49.8</b>	

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**Suman Kumar Sharma**  
Head (Electrical Maintenance)  
Transmission & Distribution  
Tata Steel, Kalinga, Odisha



The Hon'ble Commission may review the Inspection fee expenses and training expenses. Details of training calendar and its benefits may be checked.

### 8. Depreciation Cost

That the OPTCL has projected depreciation expenditure at Rs. 356.57 Crs for FY 2025-26 against Rs. 275.67 Crs as approved by the Commission to be spent during FY 2024-25.

The summary of Depreciation of OPTCL for the last fourteen financial years is furnished below.

#### Summary of Depreciation Cost

Financial Year	Proposed	Approved
2010-11	153.31	76.6
2011-12	156.4	79.42
2012-13	155.99	78.57
2013-14	172.85	89.4
2014-15	176.02	92.71
2015-16	197.72	107.48
2016-17	150.5	101.45
2017-18	192.59	130.76
2018-19	217.9	145.43
2019-20	186.03	162.06
2020-21	208.59	195.59
2021-22	276.5	232.95
2022-23	263	233.57
2023-24	293.96	269.54
2024-25	320.03	275.67
2025-26	356.57	

- Norms of tariff regulations and rates as specified in the Transmission Tariff regulations should be considered.
- The depreciation should be determined after due scrutiny.



Suman Kumar Sharma  
Executive Director (M&A/Governance)  
Transmission & Distribution  
100, Sector 1, Kaimganj, Rohtak

**9. Annual Revenue Requirement:**

That the OPTCL has given the proposal for an annual revenue requirement of Rs. 1663.33 Crore for FY 2025-26 against Rs. 913.7 Crore as approved by the Commission to be spent during FY 2024-25.

The summary of ARR of OPTCL for the last fourteen financial years is furnished below.

Financial Year	Proposed	Approved
2011-12	1435.88	579.34
2012-13	1348.46	612.53
2013-14	874.74	597.87
2014-15	988.8	641.3
2015-16	1008.36	630.94
2016-17	975	623.25
2017-18	1013.63	639.4
2018-19	990.65	659.95
2019-20	861.27	706.71
2020-21	966.44	713.84
2021-22	1307.17	792.93
2022-23	1247.14	831.95
2023-24	1102	896.18
2024-25	1380.69	913.7
2025-26	1663.33	

Hence the Annual Revenue Requirement of OPTCL for FY 2025-26 may be approved accordingly through a prudence check and based on the submission made above by the Respondent.

**10. Determination of Transmission Charges**

OPTCL has given the proposal for transmission charges @ 36.08 P/U for FY 2025-26 against 24 P/Unit as approved by the Commission during FY 2024-25. The proposed Transmission Tariff of 36.08 P/U is very high and should not be permitted. This will adversely affect the RST of the DISCOMS and will be a huge burden on the consumers of Odisha.

  
Suman Kumar Sharma  
By: 107

## 11. Transmission Loss:


OPTCL has proposed transmission loss at 3.05%. In conformity with the power sector reform, OPTCL needs to reduce the transmission loss significantly. We propose to approve transmission loss of OPTCL at 2.5%.

However, in the neighbouring states such as Andhra Pradesh, where almost similar type of network configuration is available, the Electricity Regulatory Commission has considered the lower limit of intra-state transmission loss for the FY 2023-24 at the level of 2.80%. Further, the transmission losses approved by the respective Electricity Regulatory Commissions for other neighbouring states like West Bengal, Madhya Pradesh, Bihar, and Chhattisgarh with similar types of infrastructure are in the range of 2.23% to 3%.

In page 229, OERC Form T-6, OPTCL has considered gross input at 22625.18 MU and gross output 21925.96 MU for the period April 2024 to September 2024. Thus, the total loss for 6 months is 699.23 MU. However, it may be noted that a CGP of capacity 250 MW inject around 25 MU in a financial year to OPTCL grid as inadvertent injection. Now, considering operating capacity of CGP in Odisha at 9850 MW, the estimated inadvertent injection to OPTCL grid will be around 985 MU. Hence, in a period of six months the average inadvertent injection will be 492.5 MU. Thus, the reported transmission loss of OPTCL of 699.23 MU in six months is incorrect and is based on without any third party audit. If we account for the CGP inadvertent injection, then the loss will be around  $699.23 \text{ MU} - 492.5 \text{ MU} = 206.73 \text{ MU}$ . Thus, the OPTCL transmission loss will be around 0.91%. In view of the above submission, it is prayed before the Hon'ble Commission to consider the above and accordingly re-calculate and approve transmission loss.

12. That OPTCL have not yet identified the areas where loss is maximum and OPTCL need to formulate action plans for loss reduction. OPTCL should inform the methodology adopted to estimate the transmission loss for every year. OPTCL should have undertaken energy audits of lines and substations to know the quantum of transmission loss in the system. There is enough measure by which OPTCL could reduce the Transmission loss. OPTCL should conduct energy audits and their standard performance should be monitored by a third party auditor appointed by the Commission so as to assess the actual performance of the licensees.

13. That earlier CGPs used to inject inadvertent power to the grid and GRIDCO availed the benefits of inadvertent power. GRIDCO also used to pay the hydro pool cost towards the inadvertent power. However, from FY 2019-20 onwards GRIDCO has stopped making payment towards inadvertent injections. Hence, OPTCL become the ultimate beneficiary of such injection of inadvertent power. We pray to Hon'ble Commission to direct OPTCL to

  
Suman Kumar Sharma  
Head (Electrical Maintenance)  
Transmission & Distribution  
Tata Steel, Kalinganagar

submit the detail list of inadvertent injection for each month by each CGP and consider the same as an additional injection to the grid accordingly calculate the transmission loss. The data of inadvertent injection is available with OPTCL and SLDC for each month for each CGP who are connected to EHT transmission system of OPTCL. The entire stakeholder and consumers of Odisha will be benefitted by such methodology as the intra-state transmission loss will reduce significantly.

#### **14. Open Access Charges:**

In order to have an insights on the loading of existing transmission systems corresponding to the system peak demand of 6927.78 MW as touched in the month of June 2024. Each year Hon'ble OERC informed OPTCL to submit 400 kV, 220 kV, 132 kV Power Transformer and EHT lines loading. OPTCL should make a practice to submit the Power flow data for 400 kV, 220 kV line and 132 kV line and its loading and the entire Auto-transformer loading, Power Transformer and ICT loading along with the ARR application. Moreover by only submitting only power transmitted on the peak demand day will not solve the purpose. In order to ascertain the margin availability, OPTCL may be directed to submit the maximum power handling capability, power flow and % loading of all the 400 kV, 220 kV, 132 kV line and Power Transformer, Auto Transformer, ICT Transformers. It is also desired that OPTCL should conduct load flow analysis to handle around 2000-3000 MW differential load in appropriate manner.

Once these data are made available, it can be ascertained that, there are sufficient margin is available in the transmission network and in order to utilize it fully, STOA should be promoted and the charges for the same may be kept at 1/4 of the MTOA and LTOA charges and necessary amendments in the regulations may be made.


#### **15. Introduction of Reactive Energy Charges:**

OPTCL has proposed to introduce Reactive Energy Charges of 3 Paise / KVARh which is very high and should be reduced in consultation with various stakeholders.

#### **16. Levy of Grid Support Charge for connectivity:**

OPTCL has submitted an application to the Hon'ble OERC on 26.06.2024, to determine and approve the imposition of Grid Support Charges for industries with Captive Generating/Cogeneration plants that operate alongside the OPTCL grids.

The case was registered as OERC Case No.-44/2024. In an order dated July 6, 2023, the High Court suggested that if OPTCL wishes to pursue the imposition of Grid Support Charges, they should file a separate application with the OERC. The court emphasized that

**Kumar Sharma**  
Head (Technical Maintenance)  
Transmission & Distribution  
Tata Steel, Jamshedpur

the OERC, under Section 181 of the Electricity Act, should examine the justifiability of such charges. Hon'ble Commission in order dated 09.07.2024 in case no 44 of 2024 has directed OPTCL to submit a consolidated report considering certain queries. Therefore, the proposal of OPTCL to levy of Grid Support Charge for FY 2025-26 for connectivity may be rejected.

17. The Commission may direct OPTCL to continuously monitor the operation of transmission system, prevent over loading/under loading wherever possible by taking suitable measures and take up innovative action for optimum loading of the existing network for further reduction of loss.


18. Further, OPTCL has mentioned that some of the substations are operating in under loaded condition because of absence of downstream infrastructure of DISCOMs. The Commission directs OPTCL to take action for a co-ordinated development of intra-state network, ISTS and downstream distribution network. The time frame of execution of transmission system should be discussed with DISCOMs & CTU in order to avoid stranded assets and idle investments.

19. Therefore, the Commission should direct that no transmission system strengthening proposals should be executed without the prior approval of the Commission. OPTCL should submit the comprehensive system study along with requirements as specified in the licence conditions of OPTCL and tariff regulations for approval of the Commission before proceeding for execution of the project.

20. The Commission therefore should direct OPTCL to take up the matter with Government of Odisha to fund the economically unviable projects and the other projects that are required for the larger interest of the State through grants.

21. OPTCL should be directed to consider the meter data to assess the month-wise transmission loss in intra-state transmission system including losses at different voltage levels (i.e. 132 kV, 220 kV and 400 kV levels).

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**Suman Kumar Sharma**  
Head (Electrical Maintenance)  
Transmission & Distribution  
Tata Steel, Kalinganagar

**PRAYER**

in the facts and circumstances stated above and in the interest of the parties and the larger interest of the State the Hon'ble Commission be pleased to pass appropriate orders to the effect that

1. ARR of OPTCL may be approved accordingly based on the submission made above.
2. The Transmission Charges should be reviewed and reduced substantially.
3. Transmission loss to be reduced considering the submission made for FY 2025-26.
4. Proposal of Reactive energy charges of 3 paise/KVARh should be reduced.
5. Proposal of OPTCL to levy of Grid Support Charge for connectivity may be rejected.
6. Each year trueing up exercise and business plan approval should be carried out by Hon'ble commission through a process of public hearing.

**Place: Bhubaneswar**

**For M/s. Tata Steel Limited**

**Date: 15.01.2025**

  
**Authorized Signatory**  
*Suman Kumar Sharma*  
**Suman Kumar Sharma**  
Head (Electrical Maintenance)  
Transmission & Distribution  
Tata Steel, Kalinganagar

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
PLOT NO. 4, CHUNAKOLI, SAILESHREE VIHAR,  
CHANDRASEKHARPUR, BHUBANESWAR-751021

CASE NO. 93/2024  
FILING NO. 3

**IN THE MATTER OF:** (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**And**

(ii) Truing up application for the FY 2023-24 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

**AND**

**IN THE MATTER OF:** Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

..... Applicant

**vrs**

**M/s. Tata Steel Limited**, Kalinganagar Industrial Complex, Duburi, JK Road, Dist-Jajpur, PIN- 755026 and **15 others**.

..... Objectors

**Rejoinder to the objections raised by the Objector M/s. Tata Steel Limited, Kalinganagar.**

**The humble applicant above named**

**MOST RESPECTFULLY SHEWETH:**

1. That, the Objector M/s. Tata Steel Limited, Kalinganagar vide affidavit dated 15.01.2025 has raised certain submissions on ARR & Transmission Tariff Application

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of OPTCL for FY 2025-26 and Truing up application for FY 2023-24. In reply, OPTCL submits its rejoinder to the submissions in the following paragraphs.

**Rejoinder to Para 5 to 9:**

That, the respondent has submitted the statistical data related to the past year comparing the proposed vis-à-vis approval in respect of expenses towards human resource expenses , R&M expenses , A&G expenses, depreciation with a request to approve accordingly after due scrutiny. In this regard it is submitted that OPTCL has submitted its ARR application for FY 2025-26 as per the various provisions stipulated in OERC (Terms & Conditions for Determination of Transmission Tariff) Regulations, 2014 and directions of the Commission passed in different orders with proper justifications.

**Rejoinder to Para 10:**

**Determination of Transmission Charges:**

The Transmission infrastructures are created considering the demand and request of the DISCOMs from time to time, after due approval from the Hon'ble OERC through Transmission Plan. Being a Transmission License, OPTCL has always endeavored to create the Transmission infrastructure for providing reliable and quality power to the consumers of DISCOMs. Accordingly, every year OPTCL is adding more transmission assets to meet the requirement of DISCOMs. Transmission Charge is arrived at 36.08 paise per unit by dividing the total ARR of OPTCL with the recent realistic MU projections of DISCOMs and recovered from them on a monthly basis. This rate will decrease if DISCOMs drawal increase. Alternatively, OPTCL is proposing to recover the Transmission charges on a monthly basis, based on the recent realistic MU projections of DISCOMs, **irrespective of the drawal.**

The proposed Transmission Charge of 36.08 p/u has been derived by considering the recent realistic energy demand projections of 38764.29 MU as communicated by the DISCOMs & other LTOA customers and the ARR figures have been arrived by OPTCL justifying component wise projections as per the provisions contained in OERC Transmission Tariff Regulations, 2014, OPTCL's Audited Accounts for FY 2023-24, all relevant data/information and materials. The details of projections are submitted in page 51-52 of the present ARR application of OPTCL for FY 2025-26. Moreover, OPTCL had furnished all requisite information and details as per the prescribed formats of the Hon'ble Commission with full justifications.

Hence, mere apprehension of the respondent towards imposition of excessive burden on Discoms seems to be inappropriate and unacceptable which is likely to be rejected at this juncture. Moreover, the contention of the stake holder operating in the





value chain of electricity needs to appreciate the fact that the cost recovery has to be in full so as to make the sector sustainable.

Hence, OPTCL does not agree with the views of the Objector.

**Rejoinder to Para 11 to 13:**

**Transmission Loss**

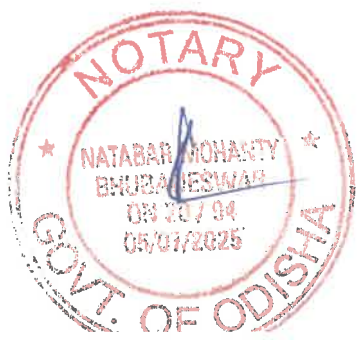
First of all, the proposal to approve transmission loss of OPTCL at 2.5% is baseless and without any study.

The actual transmission loss for the period **Apr' - Sep' 2024** is calculated to be **3.09%** as shown in the ARR & TT application for FY 2025-26 (page-229). This figure is **less than the actual** transmission loss during last year i.e. **3.11%** for **FY 2023-24**. In fact, OPTCL had projected Transmission loss of 3.05% for FY 2024-25, but Hon'ble Commission had set a target of 3.00% which could not be achieved yet.

In OPTCL system, the transmission loss is purely technical loss and a function of real time injection of power by a number of generators, system configuration and power flow requirements at different load centers. It depends on many parameters / factors such as distance and mismatch between generation and load centers, types of load, reactive power compensation, voltage profile, seasonal variation of demand load etc. Thus, OPTCL does not have much control over the same at any point of time. The transmission system of OPTCL operates as an integral part of the Eastern Region Grid to serve the internal demand of the State as well as to carry out import and export of power depending upon the system demand.

As of the matter of fact, some grid s/s and lines are being constructed in many remote and deprived areas funded under Central & State Govt. schemes in the interest of public. Additional length in EHT lines and Sub-stations in under-loaded areas are also responsible for increase in transmission loss.

The Transmission Loss in OPTCL network is in a gradually reducing trend over the years i.e. from 3.73% during 2014-15 to 3.11% in 2023-24 and has remained 3.09% within 1<sup>st</sup> six months of FY 2024-25 mainly due to addition of infrastructure and various system strengthening works taken up by OPTCL. The actual losses incurred over the years by OPTCL have been within the margin allowed by Hon'ble Commission up to the year FY 2017-18. However in FY 2018-19, the commission set the loss at 3.00% though the projected transmission loss was at 3.25% and thereafter the commission has been pegging the transmission loss at the same level though loss projected by OPTCL remained in a downward trend.



Year	Tr. Loss proposed	OERC Approval	Actual
2014-15	3.75%	3.75%	3.73%
2015-16	3.75%	3.75%	3.67%
2016-17	3.70%	3.70%	3.58%
2017-18	3.50%	3.50%	3.34%
2018-19	3.25%	3.00%	3.28%
2019-20	3.25%	3.00%	3.25%
2020-21	3.20 %	3.00%	3.22%
2021-22	3.15%	3.00%	3.18%
2022-23	3.10%	3.00%	3.15%
2023-24	3.10%	3.00%	3.11%
2024-25	3.05%	3.00%	3.09% (1 <sup>st</sup> six months )

From the table given above, it is also clear that each year upto FY 2017-18, the transmission loss achieved by OPTCL has remained at a level lower than the approved figures by Hon'ble commission and from FY 2018-19 the target set by OERC appears to be very stiff which was hard to achieve though **the trend of lesser transmission loss year after year has been achieved.**

That the transmission losses depend upon the voltage level at which the power is transmitted. The transmission losses are higher where the percentage of lower voltage (132kV or below) transmission system is higher. A comparison of the average transmission losses of a few state transmission licensees and their corresponding transmission assets at low voltage level (132 kV) is shown below.

**TRANSMISSION LOSS (%) OF OTHER STATES OF LOW VOLTAGE LINES  
UPTO 132KV FOR FY 2023-24**

States	% of Low voltage Lines (up to 132 kV)			Actual Transmission Losses for FY 2023-24 (%)
	Transmission Lines up to 132kV (Ckm)	Total Transmission Lines (Ckm)	% of Transmission Lines up to 132kV	
Odisha (OPTCL)	8479.831	16508.068	51.36%	3.11
Uttar Pradesh (UPPTCL)	28733	60145	47.77%	3.22
Gujarat (GETCO)	44512	73054	60.93%	3.83



*Roabeer Kumar Malik*

It may be kindly be appreciated that the transmission loss (technical) is bound to happen as per law of physics and is very difficult to reduce after a certain level. Also, at all India level, the transmission loss of utilities have remained at more than 3.00% and to suffice our view point the table is given below for kind appreciation of Hon'ble Commission.

**Transmission loss of Different states for FY 2023-24**

Name of states	Tr. loss approved by State Commission	Actual Tr. loss
Uttar Pradesh (UPPTCL)	3.22%(UERC)	3.22%
Gujarat (GETCO)	3.60% (GERC)	3.83%
Assam (AEGCL)	3.30%(AERC)	3.30%
Rajasthan (RVPN)	4.50%(RERC)	4.23%
Himachal Pradesh (HPPTCL)	3.19% (HERC)	3.25%

All India average transmission loss for the period 06-01-2025 to 12-01-2025 as published by Grid Controller Of India Limited, National Load Despatch Centre dated 18.01.025 is 4.00 %. Further, as per the CEA General Review 2024 (Containing Data for the Year 2022-23) the transmission loss of Eastern Region is 3.37% (attached as **Annexure-01**). Present transmission loss level of OPTCL is much less than both the said cases (i.e. Grid Controller Of India Limited & CEA General Review 2024).

However, as a responsible Transmission utility, OPTCL is making an all-out effort to reduce the transmission loss further by undertaking various **system operation and loss reduction measures** by implementing the emerging technologies like **system Automation**, load bifurcation, **modification in system configuration**, procurement of more efficient equipment, **Digitalization of grids** by using SAS, Protection system improvement using Busbar protection and Event Logger, **Conversion of Radial to Ring system**, Advanced Metering Infrastructure etc. to bring it to **3.05% by FY 2025-26**.

**Regarding inadvertent power**

OPTCL does not agree to the assumption of the respondent that around 985MU of inadvertent power will be injected in OPTCL system in a year considering the CGP capacity 9850MW. In this regard it is submitted that during the last six months, it is observed that total inadvertent power injection is 239.38MU which has been already considered while calculating the Transmission loss of 3.09% in form T-

*Poojbeer Kumar Mallik*

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6. Hence, Transmission loss as suggested by the Objector is not just and proper. Details of inadvertent power injected by CGPs in FY 2024-25 till November is attached as **Annexure-02**.

Further, it is submitted that Transmission charge is being computed on Open access transactions based on scheduled energy. Hence, OPTCL does not reap any benefit out of inadvertent power.

**Steps taken for Energy Audit**

Around 2600 nos. of 0.2s Accuracy Class ABT Energy meters are required for different metering points at all Grid Substations of OPTCL for billing and audit purposes. 538 nos. of meters have been installed by OPTCL at different metering points. 2000 nos. energy meters will be installed at different Grid Substations under SAMAST Project, out of which 70 nos. meters have been installed and the installation process of balance meters are in progress. The installation of energy meters for balance metering points under **SAMAST** Project will be completed by 31st October 2025. After installation of the meters, energy audit and calculation of transmission losses of OPTCL on an element-wise at different voltage levels will be feasible.

**Rejoinder to Para 14:**

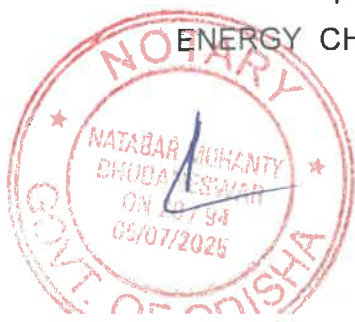
**Open Access Charges:**

That the system peak demand of 6927.78 was touched on dated.19.10.2024. Statement on the loading pattern of the existing transmission system (400kV, 220kV, 132kV power transformers and EHT lines) corresponding to the peak demands is attached as **Annexure-03**. OPTCL has already conducted load flow study considering different load scenario i.e Summer peak, Winter lean, High hydro, Low Hydro & Solar Peak, in the Revised 14<sup>th</sup> Intra-state Transmission Plan of Odisha for FY 2022-23 to FY 2026-27, which has been approved by Hon'ble Commission vide case no. 08/2024. In the aforesaid report percentage loading of all Transmission line, ICT, Auto & Power Transformers till FY 2026-27 have been mentioned. The Transmission infrastructures are created considering the demand and request of the DISCOMs from time to time, after due approval form the Hon'ble OERC through Transmission Plan and the DISCOMs and other LTOA customers are responsible to bear the full approved ARR of OPTCL. STOA charges is being charged as per the Open Access Regulations, 2020.

**Rejoinder to Para 15:**

**Reactive Energy Charges:**

As per Regulation 31(1) under Chapter-7 (IMBALANCE AND REACTIVE ENERGY CHARGES) of the OERC (Terms and Conditions of Intra-State Open



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Prabeer Kumar Mallik

Access) Regulations, 2020, payment for the reactive energy charges by open access consumers shall be in accordance with provisions stipulated in the State Grid Code or as may be specified in relevant regulations/orders of the Hon'ble Commission .

The Hon'ble Commission in Para 16 (page 5) of the order dated 05.02.2019 in Case No. 50/2017 has inter alia viewed that the provisional reactive energy charges of 3 paise/KVARh as allowed in the ARR order of OPTCL for FY 2018-19 continue for time being till a final justification is submitted by OPTCL in consultation with the stakeholders. However, OPTCL **has not realized any revenue** from Reactive Energy Charges so far.

In view of the above, OPTCL proposes that 3paise/KVARh may be approved provisionally as Reactive Energy Charges for FY 2025-26.

Hence, the proposal of objector to reduce the reactive energy charges as suggested by OPTCL is not just and proper.

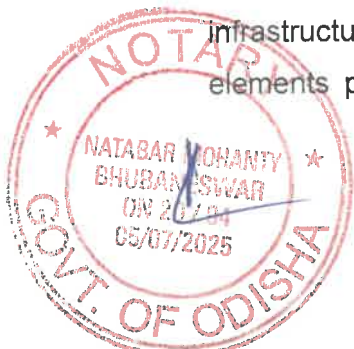
**Rejoinder to Para 16:**

**Levy of Grid Support Charge for connectivity:**

The benefits derived by the CGPs with co-located loads are enormous. The benefits are in the nature of ancillary services which are not paid till now. The Grid support charges (GSC)/Parallel operation charge has been levied by different state Regulatory Commissions and upheld by APTEL and Supreme Court of India through various orders and hence proposed by OPTCL through a separate petition. Recently, OPTCL had filed an application (case No. 44 of 2024) on 26.06.2024 for determination and approval for levy of Grid Support Charges for industries having Captive Generating / Cogeneration plants and running in parallel with the Grids of OPTCL. Hon'ble Commission in its order directed OPTCL to submit a consolidated report considering the observations/queries raised by the stakeholders in the earlier Cases filed by OPTCL. In compliance to above, OPTCL is in final stage of preparation of the required consolidated report and will be submitted before Hon'ble Commission shortly.

**Rejoinder to Para 17 & 18:**

To prevent overloading, regular system study has been carried out and augmented the network capacity as and when required. Priority has been given to use the under loaded network. As directed by Commission, regular meetings are being conducted with DISCOMs for creation and timely completion of downstream infrastructure for optimum utilization of transmission networks. New Transmission elements proposed by OPTCL to strengthen state evacuation are deliberated and



approved in the CMETS-ER meeting, held on monthly basis which are further incorporated in National Transmission Network.

**Rejoinder to Para 19:**

OPTCL always executes its projects which are either approved in Business Plan of OPTCL or Intra State Transmission Plan. As per the license conditions, OPTCL is mandated to take prior approval of Hon'ble Commission for any transmission projects above Rs. 10 Cr. which OPTCL has been following scrupulously.

**Rejoinder to Para 20:**

Since the creation of a transmission infrastructure requires huge investments, OPTCL always request state Government for financial support. State Govt. has been contributing 100% financial assistance in shape of grant/equity in case of non-remunerative and contributing 30% equity support in case of remunerative projects.

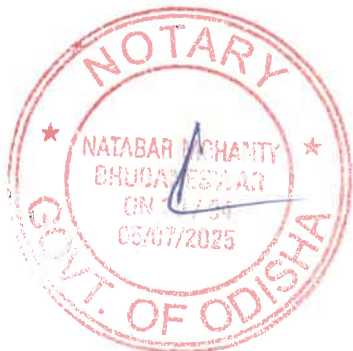
2. The objections not specifically admitted may be deemed to have been denied.

**PRAYER**

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of M/s. Tata Steel Limited, Kalinganagar while approving ARR and Transmission Tariff of OPTCL for FY 2025-26 & Truing up application for the FY 2023-24.

Bhubaneswar  
January 31, 2025

By the Applicant  
Through  
*Prabbeer Kumar Mallik*  
Sr. GM (EI.), RT&C



**Table 6.2**  
**Regional Transmission Losses**  
**Utilities**  
**2022-23**

Region	Energy Available in the Region (GWh)	Export to other Region (GWh)	Export to Nepal (GWh)	Export to Bangladesh (GWh)	Export to Bhutan (GWh)	Export to Myanmar (GWh)	Total Energy drawal by States/Utilities (GWh)	Transmission Losses (GWh)	Transmission Losses (%)
1	2	3	4	5	6	7	8	9 (2-3-4-5-6-7)	10((8/2)x100)
Northern Region	235784.74	3399.70	343.64	0.00	0.00	0.00	224171.69	7869.71	3.34
Western Region	282367.53	57344.05	0.00	741.34	0.00	0.00	215219.30	9062.84	3.21
Southern Region	173393.55	7625.46	0.00	3491.13	0.00	0.00	156314.82	5962.13	3.44
Eastern Region	134352.68	57191.16	314.03	7547.70	266.30	0.00	64506.41	4527.08	3.37
North Eastern Region	21117.54	4662.00	0.00	1039.50	38.47	9.81	14499.49	868.27	4.11

SL. No.	CGP Stations	STATEMENT OF FREE POWER OF CGPS FOR FY 2024-25												TOTAL Injected (In Kwh)
		APRIL'24 Injected (In Kwh)	MAY'24 Injected (In Kwh)	JUN'24 Injected (In Kwh)	JULY'24 Injected (In Kwh)	AUG'24 Injected (In Kwh)	SEPT'24 Injected (In Kwh)	OCT'24 Injected (In Kwh)	NOV'24 Injected (In Kwh)					
1	IMFA	9,64,093	8,71,590	9,66,013	6,90,482	6,60,805	8,44,052	11,81,938	8,61,089	70,40,062				
2	NALCO	10,68,227	11,48,265	82,715	3,79,525	1,19,400	2,91,407	7,95,571	3,54,861	42,39,971				
3	ARATI STEELS	8,62,606	9,17,113	7,95,889	8,37,134	9,54,267	7,77,542	12,32,834	4,38,520	68,15,905				
4	Aryan Ispat Ltd.	1,89,004	75,496	94,374	1,28,766	75,923	1,18,270	1,13,984	93,094	8,88,911				
5	BPSL	55,93,922	73,91,485	59,86,547	47,02,977	55,65,774	84,85,797	73,22,641	56,03,633	5,06,52,776				
6	TATA BSL(BSL)	1,04,87,992	80,79,802	1,02,02,963	1,00,97,489	59,31,643	69,64,899	1,07,69,509	78,60,310	7,03,94,607				
7	DINABANDHU	-	-	28,262	5,86,618	7,74,738	6,15,824	3,96,009	4,16,635	28,18,086				
8	HINDALCO	12,76,300	13,30,670	13,48,750	14,65,620	15,47,850	13,96,940	14,27,620	15,00,550	1,12,94,300				
9	IFFCO	730	210	480	1,990	31,380	55,630	4,700	140	95,260				
10	JSL	10,68,260	10,39,500	12,65,930	8,91,100	7,64,870	7,70,640	9,64,040	11,83,350	79,47,690				
11	JSPL	37,70,844	28,08,670	34,11,545	54,03,917	9,81,356	23,35,330	40,58,051	83,47,885	3,11,17,598				
12	BPPL	1,30,416	1,35,928	1,54,348	2,60,512	3,73,954	8,90,365	2,25,416	1,78,372	23,49,311				
14	MATTHAN	14,48,004	9,09,222	4,00,413	6,83,208	10,57,109	9,66,770	10,59,627	7,65,805	72,90,168				
15	NARBHERAM	2,01,659	58,238	1,03,200	-	56,914	2,25,360	1,47,510	2,39,699	10,32,580				
16	NINL	5,028	31	26,323	96,865	5,696	95,165	11,240	3,849	2,44,197				
17	MGM	1,82,571	1,45,479	2,35,893	2,52,226	2,21,855	2,06,940	3,12,429	2,19,178	17,76,571				
18	NAVA LTD.	4,20,921	4,75,773	6,19,574	5,53,073	7,28,331	5,59,808	4,39,361	5,28,169	43,25,010				
21	DALMIA CEMENT (OCL)	2,99,204	3,75,083	2,94,627	3,14,046	1,72,849	3,16,147	2,67,925	2,33,407	22,73,288				
22	Debtor (Dalmia Kapilas)	66,891	69,910	60,865	80,334	1,19,485	1,63,380	86,986	65,883	7,13,734				
23	PATNAIK STEEL	2	1	1	-	14	-	460	5	483				
24	RSP	3,45,754	1,88,727	1,65,840	8,04,091	1,12,952	4,43,299	5,56,802	3,34,735	29,52,200				
25	MSP METALICS	1,59,426	-	75,880	1,86,416	1,21,304	1,39,010	1,22,197	1,67,099	9,41,332				
26	SHYAM METALICS	1,38,910	2,80,040	74,430	1,94,760	1,21,420	1,68,600	38,210	1,57,180	11,73,550				
27	TATA SPONGE	2,29,645	2,60,280	1,46,805	2,05,081	3,30,178	4,44,025	2,84,981	3,81,790	22,82,785				
28	VAL JHARSUGUDA	2,30,917	3,43,139	2,62,600	2,42,700	2,30,926	4,54,063	5,40,147	3,10,124	26,14,616				
29	VAL LANJGARH	2,75,100	4,13,880	6,10,070	7,13,440	6,33,460	7,86,250	8,79,780	6,37,430	49,49,410				
30	VISA	7,71,061	10,05,163	9,47,300	12,17,292	30,61,941	12,17,292	14,18,462	12,09,048	96,30,267				
31	OSISL	7,65,935	4,69,738	3,29,024	2,69,420	5,23,439	3,70,361	5,48,210	3,71,584	36,47,711				
34	SHREE GANESH	1,00,210	1,55,053	2,54,522	3,41,391	4,46,352	4,17,582	4,09,942	10,46,114	31,71,166				
35	FACOR	2,65,677	5,50,814	7,41,583	8,52,098	6,34,255	7,53,202	8,37,072	7,47,334	53,82,035				
36	ADITYA(LAPANGA)	6,78,480	8,25,910	8,25,390	7,56,250	8,02,740	7,21,920	8,59,310	7,69,820	62,39,820				
37	Arcelor Mittal Nippon Steel	4,772	90,245	99,500	1,11,325	65,628	29,951	55,182	58,708	5,15,311				
38	BEL	2,10,320	2,69,476	2,62,673	2,75,829	2,49,068	1,95,433	2,25,838	1,87,062	18,75,699				
40	Viraj steel	6,27,076	8,81,557	8,63,335	11,05,979	7,99,391	62,962	5,69,458	5,82,286	54,92,049				
41	RUNGTA MINES DSP	30,64,885	34,10,700	31,31,957	33,01,927	26,70,196	33,64,501	33,82,666	27,08,923	2,50,35,755				
42	Runga mines(Badbil)	5,57,936	6,40,070	5,87,227	3,86,202	2,21,501	4,01,154	3,09,846	4,97,457	36,01,393				
43	Runga mines(Kamanda steel ltd.)	12,15,441	1,23,304	1,604	16,842	2,98,357	3,89,125	44,787	18,658	21,08,118				
44	SMC JHARSUGUDA	4,28,253	5,30,964	5,22,235	5,29,910	4,25,823	4,82,690	6,53,975	2,05,400	37,79,250				
45	SMC BADMAL	2,11,681	1,87,531	4,95,099	4,79,752	4,68,993	4,71,241	4,18,625	1,30,510	28,63,432				
46	ABREL	35,599	53,714	33,667	42,270	38,116	38,364	35,739	27,841	3,05,310				
47	KJS ALUWALIA	2,42,458	2,68,193	26,81,937	8,05,113	10,75,172	3,71,659	6,54,355	11,680	58,42,374				
48	SHREE CEMENT	43,307	77,658	1,48,698	1,72,642	2,11,054	2,05,650	1,46,729	93,075	10,98,813				



49	JAGANNATH POWER	4,31,538	6,59,109	7,10,884	8,95,731	9,60,536	4,04,745	6,09,344	7,82,263	54,54,150
50	ABREL KHAJURIAKATA	7,74,171	55,849	45,539	74,081	72,652	56,116	50,496	44,857	11,73,761
51	THAKUR PRASAD					7,00,673	1	5	1	7,00,680
53	ADHUNIK METALICS								5,93,528	5,93,528
54	OCL								5,70,453	5,70,453
	TOTAL CGP	3,98,45,226	3,73,05,387	4,00,96,511	4,01,69,132	3,54,10,340	3,84,69,467	4,44,70,009	4,15,39,394	31,73,05,466
	TOTAL (MU)	39.85	37.31	40.10	40.17	35.41	38.47	44.47	41.54	317.31

<b>Loading pattern corresponding to the peak demand of 6928 MW (including Vedanta drawal) on 19-JUNE-2024 AT 16:00 hrs</b>			
<b>FEEDER NAME</b>	<b>MW</b>	<b>Rated Capacity in MW</b>	<b>% Loading</b>
400KV MENDHASAL - PANDIAVAL2	50.43		
400KV MERAMUNDALI-BOL_PG	0.00		
400KV MERAMUNDALI-KANIHA1	-637.76		
400KV MERAMUNDALI-KANIHA2	-385.39		
400KV INDRAVATI ICT1	-67.47		
400KV INDRAVATI ICT2	-66.91		
400KV MERAMUNDALI-BOL_PG	0.00		
400KV DUBNW- KALABADIA	-368.96		
400KV_OPGC-JHARS_PG - 1	230.36		
400KV_OPGC-JHARS_PG - 2	150.50		
MENDHASAL -PANDIAVIL 1	49.34		
DUBNW- PANDIAVAL	75.67		
VEDANTA-JHARSUGUDA1 PG	-40.51		
VEDANTA-JHARSUGUDA2 PG	-40.23		
220KV JODA-JAMSHEDPUR	5.54	192	3%
220KV JODA-RAMCHANDRAPUR	-156.72	192	86%
KATAPALLI2-BOLAN PG	0.00	192	0%
SADEIPALLI2-BOLAN PG	-127.65	192	70%
220KV RENGALI-RENGALI PG 1	24.96	192	14%
220KV RENGALI-RENGALI PG 2	9.33	192	5%
220KV RENGALI-KANIHA	-132.61	192	73%
220KV TTPS-KANIHA	136.08	192	75%
220KV MERAMUNDALI-KANIHA 1	-107.71	192	59%
220KV MERAMUNDALI-KANIHA 2	-103.58	192	57%
220KV JAYANAGAR-JEPORE PG 1	-22.71	192	12%
220KV JAYANAGAR-JEPORE PG 2	-23.86	192	13%
220KV BUDHIPADAR-KORBA 1	-4.14	192	2%
220KV BUDHIPADAR-KORBA 2	-2.92	192	2%
220KV BUDHIPADAR-KORBA 3		192	0%
220KV TARKERA-BISRA 1	-201.68	350	61%
220KV TARKERA-BISRA 2	-205.17	350	62%
132KV KALABADIA-BANGIRIPOS	62.92	76	87%
132KV KALABADIA-BARIPADA	66.95	76	93%
220KV KALABADIA-BALASORE 1	176.81	192	97%
220KV KALABADIA-BALASORE 2	177.28	192	97%
NET - KALABADIA DRAWL	-916.91		
ATRI_AUTO-1	98.39	160	65%
ATRI_AUTO-2	98.61	160	65%
BALAS AUTO1	-77.17	160	51%
BALAS AUTO2	-76.75	160	50%
BALAS_AUTO-3	-76.34	160	50%
BHADR AUTO1	0.00	100	0%
BHADR AUTO2	91.01	160	60%
BHADR_AUTO-3	91.84	160	60%

BHANJ AUTO1	53.54	160	35%
BHANJ AUTO2	47.17	160	31%
BIDAN AUTO1	-54.85	100	58%
BIDAN AUTO2	0.00	100	0%
BIDAN AUTO3	23.75	160	16%
BOLNW AUTO1	67.28	160	44%
BOLNW AUTO2	70.89	160	47%
BOLNW_AUTO-3	66.65	160	44%
BUDHI AUTO1	92.49	160	61%
BUDHI AUTO2	52.98	160	35%
BURLA AUTO1	35.41	100	37%
BURLA AUTO2	35.34	100	37%
BURLA_AUTO-3	53.04	160	35%
CHAND AUTO1	56.32	100	59%
CHAND AUTO2	97.51	160	64%
CHAND AUTO3	60.82	100	64%
CHAND AUTO4	94.03	160	62%
DUBURI AUTO1	58.66	160	39%
DUBURI AUTO2	56.70	160	37%
DUBURI AUTO3	37.08	100	39%
GODA_AUTO-1	30.13	160	20%
GODA_AUTO-2	30.47	160	20%
JAYAN AUTO1	47.72	160	31%
JAYAN AUTO2	40.76	160	27%
JODA AUTO1	64.76	160	43%
JODA AUTO2	65.89	160	43%
JODA AUTO3	53.73	100	57%
LAPAN_AUTO-1	81.15	160	53%
LAPAN_AUTO-2	81.07	160	53%
MERAM AUTO1	39.55	100	42%
MERAM AUTO2	38.57	100	41%
MERAM AUTO3	37.43	100	39%
NAREN AUTO1	0.00	160	0%
NAREN AUTO2	0.00	160	0%
NAREN AUTO3	0.00	100	0%
PARAD AUTO1	-46.12	100	49%
NAYAG POWXFMR1	22.55		
NAYAG POWXFMR2	13.44		
NAYAG POWXFMR3	-22.16		
TATAPOWER1	-4.60		
TATAPOWER2	-2.02		
VAL DRAWAL	-959.45		
VEDANTA IPP	499.41	600	88%
ATRI-PANDIAVIL-1	-107.98	192	59%
BHOGRAI-KUCHEI	-29.34	76	41%
JALESWAR-KUCHEI	-40.58	76	56%
ADITYA_LOAD	0.00		
INFA-THERU	37.25	76	52%
ATRI-PANDIAVIL-2	-108.85	192	60%
220KV_KJHAR_GR -KEONJ_PG - 1	-11.58		

200

220KV_KJHAR_GR -KEONJ_PG - 2	-11.75		
LAXMIPUR_POWER TRANSFORMER	2.97	20	16%
PARAD AUTO2	-74.20	160	49%
PARAD AUTO3	-67.87	160	45%
TARKE AUTO1	50.91	100	54%
TARKE AUTO2	52.13	100	55%
TARKE AUTO3	51.04	100	54%
TARKE AUTO4	0.00	100	0%
THERU AUTO1	-22.22	100	23%
THERU AUTO2	21.45	100	23%
TTPS AUTO1	411.78		
TTPS AUTO2	0.00		
BOLNW_BOLAN_PG-2	-127.65	192	70%
132 KV ANAND_BAITARANI PWR	-0.03		
220 KV_ NAREN_TATA GOPALPUR FDR-1	0.00	192	0%
220 KV_ NAREN_TATA GOPALPUR FDR-1	3.32	192	2%
220 KV_ JAYAN_JEYPO FDR-3	-20.90	192	11%
220 KV_ JAYAN_JEYPO FDR-4	-23.87	192	13%
KESINGA - BOLANGIR PG	-60.98	192	33%
PRATAPSASAN-PANDIAVIL - 1	-111.61	192	61%
PRATAPSASAN-PANDIAVIL - 2	-111.83	192	61%
220 BUDHIPADAR - SMC 1	-13.22	192	7%
132 LAPAN - SMC	21.64	76	30%
132KV JODA-KENDUPOSI	22.42	76	31%

**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur  
Bhubaneswar-751021**

**Case No: 93/2024  
Filing No: 1**

**IN THE MATTER OF:**

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**AND**

**IN THE MATTER OF:**

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022.

**... Applicant**

**AND**

**IN THE MATTER OF:**

M/s. Tata Steel Limited, Athagarh, Anantapur, P.O. Dhurusia, Cuttack: 754027, Odisha

**...Respondent**

**The humble respondent above named most respectfully submit as under:**

1. That M/s. Tata Steel Limited, Power Plant, Athagarh, a company incorporated under the provisions of the Companies Act, 1956 having its Registered Office at Bombay House, 24-Homi Mody Street, Fort, Mumbai 400001 and plant site-cum-correspondence office at Athagarh, Anantapur, P.O. Dhurusia, Cuttack: 754027, Odisha hereinafter referred as "TSL-Athagarh" / "Respondent".
2. That TSL-Athagarh has set-up a 2 x 67.5 MW power plant at Athagarh, Anantapur, P.O. Dhurusia, Cuttack: 754027, Odisha.
3. TSL-Athagarh is submitting the following points on the application of OPTGL for determination of Annual Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 for kind review and necessary action by the Hon'ble Commission

*Biplab kaha  
Banshri Man*



*Sehabish Pathan*  
*(202)*



**4. Human Resources Expenses:**

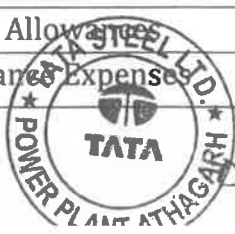
The OPTCL has projected Employee Cost expenditure at Rs. 554.05 Crore for FY 2025-26 against Rs. 488.63 Crore as approved by the Commission to be spent during FY 2024-25. The summary of Employee Expenses of OPTCL for the last fourteen financial years is furnished below.

**Summary of Employee Expenses**

Financial Year	Proposed	Approved	Actual
2010-11	865.13	279.56	173.11
2011-12	952.06	338.14	279.56
2012-13	655.36	318.48	268.59
2013-14	341.2	289.3	191.70
2014-15	361.38	318.18	309.59
2015-16	310.02	305.23	285.95
2016-17	399.56	292.55	382.44
2017-18	462.33	304.5	380.32
2018-19	419.57	360.4	375.65
2019-20	421.99	419.77	394
2020-21	466.22	415.87	373.19
2021-22	532.73	457.88	474.83
2022-23	526.53	477.19	
2023-24	508.76	449.08	
2024-25	582.06	488.63	
2025-26	554.05		

The cost break-up of the employee expense is provided below:

Sl. No	Particulars	Prev. Year 2023-24	Curr. Year 2024-25	Ensuring Year 2025-26
<b>A</b>	<b>Salary &amp; Allowance</b>	<b>1</b>	<b>2</b>	<b>3</b>
1	Basic Pay	156.70	156.69	160.16
2	Dearness Allowance	69.32	89.75	97.70
3	House Rent Allowance	23.18	25.87	25.87
4	Medical Allowance	7.51	8.71	8.41
5	Conveyance Expenses	2.84	3.42	3.88



*Deborah Lakshmi*  
(203)

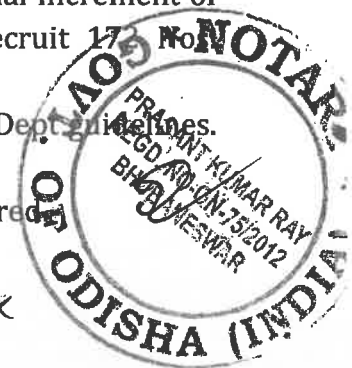


	(allowance+Reimbursement)			
6	Other Allowance	1.28	1.53	1.96
7	Bonus	0.01	0.01	0.01
8	Stipend for New Recruitment	8.49	10.00	10.53
9	Stipend to Apprentice	1.64	3.00	2.74
10	Arrear Salary for Wage Board Revision	-	6.65	-
	<b>Sub-total (A)</b>	<b>270.97</b>	<b>304.83</b>	<b>311.27</b>
<b>B</b>	<b>Additional Employee Cost</b>			
1	Out Sources Engagement	3.46	5.58	6.81
	<b>Sub-total (B)</b>	<b>3.46</b>	<b>5.58</b>	<b>6.81</b>
<b>C</b>	<b>Other Employee Cost</b>			
1	Leave Travel Concession	0.09	0.63	0.63
2	Honorarium	0.09	0.12	0.12
3	Ex-gratia	7.20	5.00	8.84
4	Staff Welfare Expenses	11.07	6.75	10.81
5	Other Employee Cost	0.52	0.02	0.02
6	Capacity Building Charges	1.05	1.02	2.40
	<b>Sub-total (C)</b>	<b>20.02</b>	<b>13.54</b>	<b>22.83</b>
<b>D</b>	<b>Terminal Benefits</b>			
1	Pension	165.77	170.41	175.53
2	Gratuity	11.66	12.01	12.37
3	Leave Salary	14.79	15.16	15.62
4	Other (including contribution to NPS)	21.91	22.62	24.52
	<b>Sub-total (D)</b>	<b>214.12</b>	<b>220.20</b>	<b>228.03</b>
<b>E</b>	<b>Total Employees Cost (A+B+C+D)</b>	<b>508.57</b>	<b>544.15</b>	<b>568.95</b>
F	Less: Employees Cost Capitalised	14.90	14.90	14.90
<b>G</b>	<b>Net Employee Cost ( E- F)</b>	<b>493.67</b>	<b>529.25</b>	<b>554.05</b>

- **Basic Pay and Grade Pay:** Basic Pay and Grade Pay proposed for FY 25-26 = Rs. **160.16** Cr. is based on actual cash flow for FY 24-25 with additional increment of 3% and average number of employee. OPTCL is planning to recruit 173 Nos. employees during FY 2024-25 and 280 Nos. in FY 2025-26.
- **DA:** OPTCL proposed 61% DA for FY 2025-26, considering Finance Dept guidelines. However, actual increase in DA may be reviewed.
- **HRA:** OPTCL proposed HRA @ 10%. Actual cash flow may be considered.



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- **Outsourcing:** OPTCL is functioning with 50% of manpower and has outsourced services. Accordingly, Rs. 6.81 Cr. has been proposed towards payment to outsourced personnel. The same can be reviewed.
- OPTCL is planning to recruit 172 Nos. employees during FY 2024-25 and 280 Nos. in FY 2025-26 and has proposed Rs.10.53 Cr. towards stipend for the new recruiters. Considering the past trend of recruitment the same may be reviewed.
- Actual addition of employees is lesser than the approved. Stipend and employee cost should be approved by reviewing proposed addition of employees.
- Terminal benefits should be reviewed on actual cash flow basis.

**Hence the Employee cost Expenses of OPTCL for FY 2025-26 may be approved accordingly by the Hon'ble Commission.**

**5. Repair and Maintenance (R&M) expenses**

That the OPTCL has projected Repair and Maintenance Expenses at Rs. 217.7 Cr for FY 2025-26 against Rs. 135 Crs as approved by the Commission to be spent during FY 2024-25.

The summary of Repair and Maintenance (R&M) expenses of OPTCL for the last fourteen financial years is furnished below.

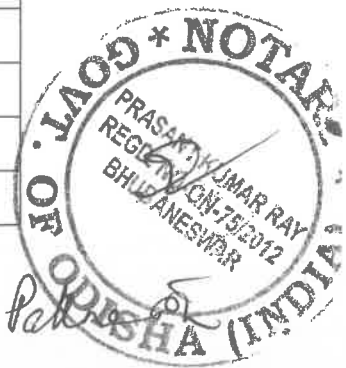
**Summary of R & M Cost**

Financial Year	Proposed	Approved
2010-11	98.14	60
2011-12	93.89	75
2012-13	95.46	95
2013-14	108.91	60
2014-15	146.77	93
2015-16	154.11	108
2016-17	170.66	110.59
2017-18	155.11	124.97
2018-19	156.19	111
2019-20	115.22	115.22
2020-21	140.59	115.22
2021-22	151.1	118.61
2022-23	148.04	110.5
2023-24	164.34	135

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<b>2024-25</b>	<b>169.3</b>	<b>135</b>
<b>2025-26</b>	<b>217.7</b>	

**6. Administration & General Cost**

That the OPTCL has projected Administrative and General (A&G) expenditure at Rs. **49.8 Crs** for FY 2025-26 against Rs. **37.05 Crs** as approved by the Commission to be spent during FY 2024-25.

The summary of Administrative and General Expenses of OPTCL for the last fourteen financial years is furnished below.

**Summary of A&G Cost**

<b>Financial Year</b>	<b>Proposed</b>	<b>Approved</b>
<b>2010-11</b>	26.99	15.14
<b>2011-12</b>	38.34	18
<b>2012-13</b>	39.11	21.25
<b>2013-14</b>	23.09	22.39
<b>2014-15</b>	25.46	24.01
<b>2015-16</b>	32.36	24.37
<b>2016-17</b>	25.58	24.66
<b>2017-18</b>	26.11	25.6
<b>2018-19</b>	27.23	26.44
<b>2019-20</b>	28.07	27.55
<b>2020-21</b>	28.66	28.72
<b>2021-22</b>	38.13	30.35
<b>2022-23</b>	43.18	37.73
<b>2023-24</b>	47.07	40.28
<b>2024-25</b>	51.13	37.05
<b>2025-26</b>	49.8	

The Hon'ble Commission may review the Inspection fee expenses and training expenses. Details of training calendar and its benefits may be checked.



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## 7. Depreciation Cost

That the OPTCL has projected depreciation expenditure at Rs. 356.57 Crs for FY 2025-26 against Rs. 275.67 Crs as approved by the Commission to be spent during FY 2024-25.

The summary of Depreciation of OPTCL for the last fourteen financial years is furnished below.

### Summary of Depreciation Cost

Financial Year	Proposed	Approved
2010-11	153.31	76.6
2011-12	156.4	79.42
2012-13	155.99	78.57
2013-14	172.85	89.4
2014-15	176.02	92.71
2015-16	197.72	107.48
2016-17	150.5	101.45
2017-18	192.59	130.76
2018-19	217.9	145.43
2019-20	186.03	162.06
2020-21	208.59	195.59
2021-22	276.5	232.95
2022-23	263	233.57
2023-24	293.96	269.54
2024-25	320.03	275.67
2025-26	356.57	

- Norms of tariff regulations and rates as specified in the Transmission Tariff regulations should be considered.
- The depreciation should be determined after due scrutiny.

## 8. Annual Revenue Requirement:

That the OPTCL has given the proposal for an annual revenue requirement of Rs. 913.7 Crore for FY 2025-26 against Rs. 913.7 Crore as approved by the Commission during FY 2024-25.

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The summary of ARR of OPTCL for the last fourteen financial years is furnished below.

Financial Year	Proposed	Approved
2011-12	1435.88	579.34
2012-13	1348.46	612.53
2013-14	874.74	597.87
2014-15	988.8	641.3
2015-16	1008.36	630.94
2016-17	975	623.25
2017-18	1013.63	639.4
2018-19	990.65	659.95
2019-20	861.27	706.71
2020-21	966.44	713.84
2021-22	1307.17	792.93
2022-23	1247.14	831.95
2023-24	1102	896.18
2024-25	1380.69	913.7
2025-26	1663.33	

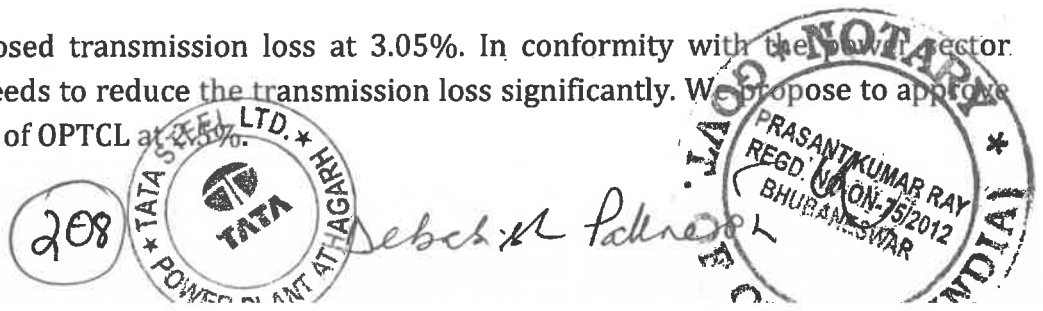
Hence the Annual Revenue Requirement of OPTCL for FY 2025-26 may be approved accordingly through a prudence check and based on the submission made above by the Respondent.

#### 9. Determination of Transmission Charges

OPTCL has given the proposal for transmission charges @ **36.08 P/U** for FY 2025-26 against 24 P/Unit as approved by the Commission during FY 2024-25. The proposed Transmission Tariff of **36.08 P/U** is very high and should not be permitted. This will adversely affect the RST of the DISCOMS and will be a huge burden on the consumers of Odisha.

#### 10. Transmission Loss:

OPTCL has proposed transmission loss at 3.05%. In conformity with the power sector reform, OPTCL needs to reduce the transmission loss significantly. We propose to approve transmission loss of OPTCL at 3.05%.



However, in the neighbouring states such as Andhra Pradesh, where almost similar type of network configuration is available, the Electricity Regulatory Commission has considered the lower limit of intra-state transmission loss for the FY 2023-24 at the level of 2.80%. Further, the transmission losses approved by the respective Electricity Regulatory Commissions for other neighbouring states like West Bengal, Madhya Pradesh, Bihar, and Chhattisgarh with similar types of infrastructure are in the range of 2.23% to 3%.

In page 229, OERC Form T-6, OPTCL has considered gross input at 22625.18 MU and gross output 21925.96 MU for the period April 2024 to September 2024. Thus, the total loss for 6 months is 699.23 MU. However, it may be noted that a CGP of capacity 250 MW inject around 25 MU in a financial year to OPTCL grid as inadvertent injection. Now, considering operating capacity of CGP in Odisha at 9850 MW, the estimated inadvertent injection to OPTCL grid will be around 985 MU. Hence, in a period of six months the average inadvertent injection will be 492.5 MU. Thus, the reported transmission loss of OPTCL of 699.23 MU in six months is incorrect and is based on without any third party audit. If we account for the CGP inadvertent injection, then the loss will be around  $699.23 \text{ MU} - 492.5 \text{ MU} = 206.73 \text{ MU}$ . Thus, the OPTCL transmission loss will be around 0.91%. In view of the above submission, it is prayed before the Hon'ble Commission to consider the above and accordingly re-calculate and approve transmission loss.

11. That OPTCL have not yet identified the areas where loss is maximum and OPTCL need to formulate action plans for loss reduction. OPTCL should inform the methodology adopted to estimate the transmission loss for every year. OPTCL should have undertaken energy audits of lines and substations to know the quantum of transmission loss in the system. There is enough measure by which OPTCL could reduce the Transmission loss. OPTCL should conduct energy audits and their standard performance should be monitored by a third party auditor appointed by the Commission so as to assess the actual performance of the licensees.

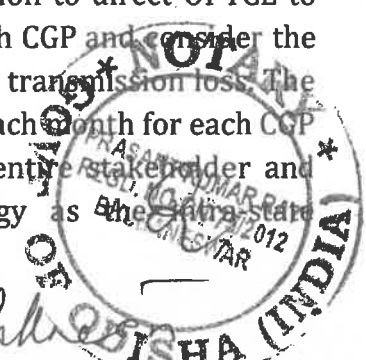
12. That earlier CGPs used to inject inadvertent power to the grid and GRIDCO availed the benefits of inadvertent power. GRIDCO also used to pay the hydro pool cost towards the inadvertent power. However, from FY 2019-20 onwards GRIDCO has stopped making payment towards inadvertent injections. Hence, OPTCL become the ultimate beneficiary of such injection of inadvertent power. We pray to Hon'ble Commission to direct OPTCL to submit the detail list of inadvertent injection for each month by each CGP and consider the same as an additional injection to the grid accordingly calculate the transmission loss. The data of inadvertent injection is available with OPTCL and SLDC for each month for each CGP who are connected to EHT transmission system of OPTCL. The entire stakeholder and consumers of Odisha will be benefited by such methodology as the intra-state transmission loss will reduce significantly.

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**13. Open Access Charges:**

In order to have an insights on the loading of existing transmission systems corresponding to the system peak demand of 6927.78 MW as touched in the month of June 2024. Each year Hon'ble OERC informed OPTCL to submit 400 kV, 220 kV, 132 kV Power Transformer and EHT lines loading. OPTCL should make a practice to submit the Power flow data for 400 kV, 220 kV line and 132 kV line and its loading and the entire Auto-transformer loading, Power Transformer and ICT loading along with the ARR application. Moreover by only submitting only power transmitted on the peak demand day will not solve the purpose. In order to ascertain the margin availability, OPTCL may be directed to submit the maximum power handling capability, power flow and % loading of all the 400 kV, 220 kV, 132 kV line and Power Transformer, Auto Transformer, ICT Transformers. It is also desired that OPTCL should conduct load flow analysis to handle around 2000-3000 MW differential load in appropriate manner.

Once these data are made available, it can be ascertained that, there are sufficient margin is available in the transmission network and in order to utilize it fully, STOA should be promoted and the charges for the same may be kept at 1/4 of the MTOA and LTOA charges and necessary amendments in the regulations may be made.

**14. Introduction of Reactive Energy Charges:**

OPTCL has proposed to introduce Reactive Energy Charges of 3 Paise / KVARh which is very high and should be reduced in consultation with various stakeholders.

**15. Levy of Grid Support Charge for connectivity:**

OPTCL has submitted an application to the Hon'ble OERC on 26.06.2024, to determine and approve the imposition of Grid Support Charges for industries with Captive Generating/Cogeneration plants that operate alongside the OPTCL grids.

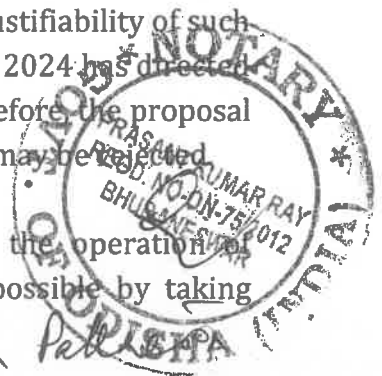
The case was registered as OERC Case No.-44/2024. In an order dated July 6, 2023, the High Court suggested that if OPTCL wishes to pursue the imposition of Grid Support Charges, they should file a separate application with the OERC. The court emphasized that the OERC, under Section 181 of the Electricity Act, should examine the justifiability of such charges. Hon'ble Commission in order dated 09.07.2024 in case no 44 of 2024 has directed OPTCL to submit a consolidated report considering certain queries. Therefore, the proposal of OPTCL to levy of Grid Support Charge for FY 2025-26 for connectivity may be rejected.

**16.** The Commission may direct OPTCL to continuously monitor the operation of transmission system, prevent over loading/under loading wherever possible by taking

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suitable measures and take up innovative action for optimum loading of the existing network for further reduction of loss.

17. Further, OPTCL has mentioned that some of the substations are operating in under loaded condition because of absence of downstream infrastructure of DISCOMs. The Commission directs OPTCL to take action for a co-ordinated development of intra-state network, ISTS and downstream distribution network. The time frame of execution of transmission system should be discussed with DISCOMs & CTU in order to avoid stranded assets and idle investments.

18. Therefore, the Commission should direct that no transmission system strengthening proposals should be executed without the prior approval of the Commission. OPTCL should submit the comprehensive system study along with requirements as specified in the licence conditions of OPTCL and tariff regulations for approval of the Commission before proceeding for execution of the project.

19. The Commission therefore should direct OPTCL to take up the matter with Government of Odisha to fund the economically unviable projects and the other projects that are required for the larger interest of the State through grants.

20. OPTCL should be directed to consider the meter data to assess the month-wise transmission loss in intra-state transmission system including losses at different voltage levels (i.e. 132 kV, 220 kV and 400 kV levels).

21. That earlier CGPs used to inject inadvertent power to the grid and GRIDCO availed the benefits of inadvertent power. GRIDCO also used to pay the hydro pool cost towards the inadvertent power. However, from FY 2019-20 onwards GRIDCO has stopped making payment towards inadvertent injections. Hence, OPTCL become the ultimate beneficiary of such injection of inadvertent power. We pray to Hon'ble Commission to direct OPTCL to submit the detail list of inadvertent injection for each month by each CGP and consider the same as an additional injection to the grid accordingly calculate the transmission loss. The data of inadvertent injection is available with OPTCL and SLDC for each month for each CGP who are connected to EHT transmission system of OPTCL. The entire stakeholder and consumers of Odisha will be benefitted by such methodology as the intra-state transmission loss will reduce significantly.

*Debi Prasad Pal*

PRAYER

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In the facts and circumstances stated above and in the interest of the parties and the larger interest of the State the Hon'ble Commission be pleased to pass appropriate orders to the effect that

1. ARR of OPTCL may be approved accordingly based on the submission made above.
2. The Transmission Charges should be reviewed and reduced substantially.
3. Transmission loss to be reduced considering the submission made for FY 2025-26.
4. Proposal of Reactive energy charges of 3 paise/KVARh should be reduced.
5. Proposal of OPTCL to levy of Grid Support Charge for connectivity may be rejected.
6. Each year truing up exercise and business plan approval should be carried out by Hon'ble commission through a process of public hearing.

Place: Bhubaneswar

For M/s. Tata Steel Limited

Date: 15.01.2025

*Debabrata Pallua*

Authorized Signatory



**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION**  
**Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur**

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**Bhubaneswar-751021**

**Case No: 93/2024**

**Filing No: 1**

**IN THE MATTER OF:**

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**AND**

**IN THE MATTER OF:**

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022

**... Applicant**

**AND**

M/c. Tata Steel Ltd., Athagarh, Anantapur, P.O. Dhurusia, Cuttack: 754027, Odisha

**...Respondent**

**Affidavit verifying the application**

I, Shri Debasish Pattnaik, Son of Sri Pravat Kumar Pattnaik aged about 57 years, working as Head-TSL Power Plant, Athagarh, Anantapur, P.O. Dhurusia, Cuttack: 754027 do hereby solemnly affirm and state as follows: -

1. That I am working as Head-TSL Power Plant, Athagarh and I am duly authorized to swear this affidavit on its behalf.
2. The statements made in the petition are based on information and I believe them to be true.

**PLACE: Bhubaneswar**

**DATE: 15.01.2025**

*Debasish Pattnaik*



*Prasant Kumar Ray*  
PRASANT KUMAR RAY  
NOTARY PUBLIC, BHUBANESWAR  
REGD. NO-ON-75/2012  
GOVT OF ODISHA

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**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur  
Bhubaneswar-751021**

**Case No: 93/2024  
Filing No: 1**

**IN THE MATTER OF:**

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**AND**

**IN THE MATTER OF:**

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022

**... Applicant**

**AND**

M/s. Tata Steel Limited, Athagarh, Anantapur, P.O. Dhurusia, Cuttack: 754027, Odisha

**...Respondent**

**Letter of Authorization**

I, Shri Debasish Pattnaik, Son of Sri Pravat Kumar Pattnaik aged about 57 years, working as Head-TSL Power Plant, Athagarh with M/s. Tata Steel Limited, Athagarh, Cuttack hereby authorize Sri Bibhu Swain, residing at K-8-82, Kalinga Nagar, Ghatikia, Bhubaneswar-751029 to be my representative to present the above case on my behalf before the Hon'ble Odisha Electricity Regulatory Commission relating to my above reply and to submit any additional submission, memos, documents etc. as may be required and in general do all such thing as may be required in connection with the above reply.

**For M/s. Tata Steel Limited**

**Place: Bhubaneswar**

**Date: 15.01.2025**

*Debasish Pattnaik*  
**Authorized Signatory**

*Prasant Kumar Ray*  
**PRASANT KUMAR RAY  
NOTARY PUBLIC, BHUBANESWAR  
REGD. NO.-ON-75/2012  
GOVT OF ODISHA**

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**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
PLOT NO. 4, CHUNAKOLI, SAILESHREE VIHAR,  
CHANDRASEKHARPUR, BHUBANESWAR-751021**

**CASE NO. 93/2024  
FILING NO. 3**

**IN THE MATTER OF:** (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**And**

(ii) Truing up application for the FY 2023-24 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

**AND**

**IN THE MATTER OF:** Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

..... Applicant

**vrs**

**M/s. Tata Steel Limited**, Athagarh, Anantapur, P.O. Dhursusia, Cuttack, Odisha- 754027 and **15 others**.

..... Objectors

**Rejoinder to the objections raised by the Objector M/s. Tata Steel Limited, Athagarh.**

The humble applicant above named

**MOST RESPECTFULLY SHEWETH:**

1. That, the Objector M/s. Tata Steel Limited, Athagarh vide affidavit dated 15.01.2025 has raised certain submissions on ARR & Transmission Tariff Application of OPTCL for FY 2025-26 and Truing up application for FY 2023-24. In reply, OPTCL submits its rejoinder to the submissions in the following paragraphs.

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*Poojbeer Kumar Mallik*

**Rejoinder to Para 4 to 8:**

That, the respondent has submitted the statistical data related to the past year comparing the proposed vis-à-vis approval in respect of expenses towards human resource expenses , R&M expenses , A&G expenses, depreciation with a request to approve accordingly after due scrutiny. In this regard it is submitted that OPTCL has submitted it ARR application for FY 2025-26 as per the various provisions stipulated in OERC (Terms & Conditions for Determination of Transmission Tariff) Regulations, 2014 and directions of the Commission passed in different orders with proper justifications.

**Rejoinder to Para 9:**

**Determination of Transmission Charges:**

The Transmission infrastructures are created considering the demand and request of the DISCOMs from time to time, after due approval form the Hon'ble OERC through Transmission Plan. Being a Transmission License, OPTCL has always endeavored to create the Transmission infrastructure for providing reliable and quality power to the consumers of DISCOMs. Accordingly, every year OPTCL is adding more transmission assets to meet the requirement of DISCOMs. Transmission Charge is arrived at 36.08 paise per unit by dividing the total ARR of OPTCL with the recent realistic MU projections of DISCOMs and recovered from them on a monthly basis. This rate will decrease if DISCOMs drawal increase. Alternatively, OPTCL is proposing to recover the Transmission charges on a monthly basis, based on the recent realistic MU projections of DISCOMs, **irrespective of the drawal.**

The proposed Transmission Charge of 36.08 p/u has been derived by considering the recent realistic energy demand projections of 38764.29 MU as communicated by the DISCOMs & other LTOA customers and the ARR figures have been arrived by OPTCL justifying component wise projections as per the provisions contained in OERC Transmission Tariff Regulations, 2014, OPTCL's Audited Accounts for FY 2023-24, all relevant data/information and materials. The details of projections are submitted in page 51-52 of the present ARR application of OPTCL for FY 2025-26. Moreover, OPTCL had furnished all requisite information and details as per the prescribed formats of the Hon'ble Commission with full justifications.

Hence, mere apprehension of the respondent towards imposition of excessive burden on Discoms seems to be inappropriate and unacceptable which is likely to be rejected at this juncture. Moreover, the contention of the stake holder operating in the value chain of electricity needs to appreciate the fact that the cost recovery has to be in full so as to make the sector sustainable.



Hence, OPTCL does not agree with the views of the Objector.

**Rejoinder to Para 10 to 12:**

**Transmission Loss**

First of all, the proposal to approve transmission loss of OPTCL at 2.5% is baseless and without any study.

The actual transmission loss for the period **Apr' - Sep' 2024** is calculated to be **3.09%** as shown in the ARR & TT application for FY 2025-26 (page-229). This figure is **less than the actual** transmission loss during last year i.e. **3.11%** for **FY 2023-24**. In fact, OPTCL had projected Transmission loss of 3.05% for FY 2024-25, but Hon'ble Commission had set a target of 3.00% which could not be achieved yet.

In OPTCL system, the transmission loss is purely technical loss and a function of real time injection of power by a number of generators, system configuration and power flow requirements at different load centers. It depends on many parameters / factors such as distance and mismatch between generation and load centers, types of load, reactive power compensation, voltage profile, seasonal variation of demand load etc. Thus, OPTCL does not have much control over the same at any point of time. The transmission system of OPTCL operates as an integral part of the Eastern Region Grid to serve the internal demand of the State as well as to carry out import and export of power depending upon the system demand.

As of the matter of fact, some grid s/s and lines are being constructed in many remote and deprived areas funded under Central & State Govt. schemes in the interest of public. Additional length in EHT lines and Sub-stations in under-loaded areas are also responsible for increase in transmission loss.

The Transmission Loss in OPTCL network is in a gradually reducing trend over the years i.e. from 3.73% during 2014-15 to 3.11% in 2023-24 and has remained 3.09% within 1<sup>st</sup> six months of FY 2024-25 mainly due to addition of infrastructure and various system strengthening works taken up by OPTCL. The actual losses incurred over the years by OPTCL have been within the margin allowed by Hon'ble Commission up to the year FY 2017-18. However in FY 2018-19, the commission set the loss at 3.00% though the projected transmission loss was at 3.25% and thereafter the commission has been pegging the transmission loss at the same level though loss projected by OPTCL remained in a downward trend.

Year	Tr. Loss proposed	OERC Approval	Actual
2014-15	3.75%	3.75%	3.73%
2015-16	3.75%	3.75%	3.67%



2016-17	3.70%	3.70%	3.58%
2017-18	3.50%	3.50%	3.34%
2018-19	3.25%	3.00%	3.28%
2019-20	3.25%	3.00%	3.25%
2020-21	3.20 %	3.00%	3.22%
2021-22	3.15%	3.00%	3.18%
2022-23	3.10%	3.00%	3.15%
2023-24	3.10%	3.00%	3.11%
2024-25	3.05%	3.00%	3.09% (1 <sup>st</sup> six months )

From the table given above, it is also clear that each year upto FY 2017-18, the transmission loss achieved by OPTCL has remained at a level lower than the approved figures by Hon'ble commission and from FY 2018-19 the target set by OERC appears to be very stiff which was hard to achieve though **the trend of lesser transmission loss year after year has been achieved.**

That the transmission losses depend upon the voltage level at which the power is transmitted. The transmission losses are higher where the percentage of lower voltage (132kV or below) transmission system is higher. A comparison of the average transmission losses of a few state transmission licensees and their corresponding transmission assets at low voltage level (132 kV) is shown below.

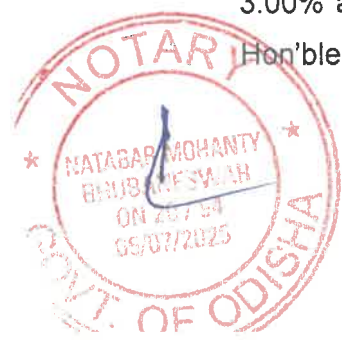
**TRANSMISSION LOSS (%) OF OTHER STATES OF LOW VOLTAGE LINES  
UPTO 132KV FOR FY 2023-24**

States	% of Low voltage Lines (up to 132 kV)			Actual Transmission Losses for FY 2023-24 (%)
	Transmission Lines up to 132kV (Ckm)	Total Transmission Lines (Ckm)	% of Transmission Lines up to 132kV	
<b>Odisha (OPTCL)</b>	8479.831	16508.068	51.36%	3.11
<b>Uttar Pradesh (UPPTCL)</b>	28733	60145	47.77%	3.22
<b>Gujarat (GETCO)</b>	44512	73054	60.93%	3.83

It may be kindly be appreciated that the transmission loss (technical) is bound to happen as per law of physics and is very difficult to reduce after a certain level. Also, at all India level, the transmission loss of utilities have remained at more than 3.00% and to suffice our view point the table is given below for kind appreciation of Hon'ble Commission.

*Prabbeer Kumar Mallick*

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### Transmission loss of Different states for FY 2023-24

Name of states	Tr. loss approved by State Commission	Actual Tr. loss
Uttar Pradesh (UPPTCL)	3.22%(UERC)	3.22%
Gujarat (GETCO)	3.60% (GERC)	3.83%
Assam (AEGCL)	3.30%(AERC)	3.30%
Rajasthan (RVPN)	4.50%(RERC)	4.23%
Himachal Pradesh (HPPTCL)	3.19% (HERC)	3.25%

All India average transmission loss for the period 06-01-2025 to 12-01-2025 as published by Grid Controller Of India Limited, National Load Despatch Centre dated 18.01.025 is 4.00 %. Further, as per the CEA General Review 2024 (Containing Data for the Year 2022-23) the transmission loss of Eastern Region is 3.37% (attached as **Annexure-01**). Present transmission loss level of OPTCL is much less than both the said cases (i.e. Grid Controller Of India Limited & CEA General Review 2024).

However, as a responsible Transmission utility, OPTCL is making an all-out effort to reduce the transmission loss further by undertaking various **system operation and loss reduction measures** by implementing the emerging technologies like **system Automation**, load bifurcation, **modification in system configuration**, procurement of more efficient equipment, **Digitalization of grids** by using SAS, Protection system improvement using Busbar protection and Event Logger, **Conversion of Radial to Ring system**, Advanced Metering Infrastructure etc. to bring it to **3.05% by FY 2025-26**.

#### Regarding inadvertent power

OPTCL does not agree to the assumption of the respondent that around 985MU of inadvertent power will be injected in OPTCL system in a year considering the CGP capacity 9850MW. In this regard it is submitted that during the last six months, it is observed that total inadvertent power injection is 239.38MU which has been already considered while calculating the Transmission loss of 3.09% in form T-6. Hence, Transmission loss as suggested by the Objector is not just and proper. Details of inadvertent power injected by CGPs in FY 2024-25 till November is attached as **Annexure-02**.

Further, it is submitted that Transmission charge is being computed on Open access transactions based on scheduled energy. Hence, OPTCL does not reap any benefit out of inadvertent power.



### Steps taken for Energy Audit

Around 2600 nos. of 0.2s Accuracy Class ABT Energy meters are required for different metering points at all Grid Substations of OPTCL for billing and audit purposes. 538 nos. of meters have been installed by OPTCL at different metering points. 2000 nos. energy meters will be installed at different Grid Substations under SAMAST Project, out of which 70 nos. meters have been installed and the installation process of balance meters are in progress. The installation of energy meters for balance metering points under **SAMAST** Project will be completed by 31st October 2025. After installation of the meters, energy audit and calculation of transmission losses of OPTCL on an element-wise at different voltage levels will be feasible.

### Rejoinder to Para 13:

#### Open Access Charges:

That the system peak demand of 6927.78 was touched on dated.19.10.2024. Statement on the loading pattern of the existing transmission system (400kV, 220kV, 132kV power transformers and EHT lines) corresponding to the peak demands is attached as **Annexure-03**. OPTCL has already conducted load flow study considering different load scenario i.e Summer peak, Winter lean, High hydro, Low Hydro & Solar Peak, in the Revised 14<sup>th</sup> Intra-state Transmission Plan of Odisha for FY 2022-23 to FY 2026-27, which has been approved by Hon'ble Commission vide case no. 08/2024. In the aforesaid report percentage loading of all Transmission line, ICT, Auto & Power Transformers till FY 2026-27 have been mentioned. The Transmission infrastructures are created considering the demand and request of the DISCOMs from time to time, after due approval form the Hon'ble OERC through Transmission Plan and the DISCOMs and other LTOA customers are responsible to bear the full approved ARR of OPTCL. STOA charges is being charged as per the Open Access Regulations, 2020.

### Rejoinder to Para 14:

#### Reactive Energy Charges:

As per Regulation 31(1) under Chapter-7 (IMBALANCE AND REACTIVE ENERGY CHARGES) of the OERC (Terms and Conditions of Intra-State Open Access) Regulations, 2020, payment for the reactive energy charges by open access consumers shall be in accordance with provisions stipulated in the State Grid Code or as may be specified in relevant regulations/orders of the Hon'ble Commission .

The Hon'ble Commission in Para 16 (page 5) of the order dated 05.02.2019 in Case No. 50/2017 has inter alia viewed that the provisional reactive energy charges of 3 paise/KVArH as allowed in the ARR order of OPTCL for FY 2018-19 continue for



time being till a final justification is submitted by OPTCL in consultation with the stakeholders. However, OPTCL **has not realized any revenue** from Reactive Energy Charges so far.

In view of the above, OPTCL proposes that 3paise/KVARh may be approved provisionally as Reactive Energy Charges for FY 2025-26.

Hence, the proposal of objector to reduce the reactive energy charges as suggested by OPTCL is not just and proper.

**Rejoinder to Para 15:**

**Levy of Grid Support Charge for connectivity:**

The benefits derived by the CGPs with co-located loads are enormous. The benefits are in the nature of ancillary services which are not paid till now. The Grid support charges (GSC)/Parallel operation charge has been levied by different state Regulatory Commissions and upheld by APTEL and Supreme Court of India through various orders and hence proposed by OPTCL through a separate petition. Recently, OPTCL had filed an application (case No. 44 of 2024) on 26.06.2024 for determination and approval for levy of Grid Support Charges for industries having Captive Generating / Cogeneration plants and running in parallel with the Grids of OPTCL. Hon'ble Commission in its order directed OPTCL to submit a consolidated report considering the observations/queries raised by the stakeholders in the earlier Cases filed by OPTCL. In compliance to above, OPTCL is in final stage of preparation of the required consolidated report and will be submitted before Hon'ble Commission shortly.

**Rejoinder to Para 16 & 17:**

To prevent overloading, regular system study has been carried out and augmented the network capacity as when required. Priority has been given to use of under loaded network. As directed by Commission regular meeting has been conducted with DISCOMs for creation of downstream infrastructure for optimum utilization transmission networks.

**Rejoinder to Para 18:**

OPTCL always executes its projects which are either approved in Business Plan of OPTCL or Intra State Transmission Plan. As per the license conditions, OPTCL is mandated to take prior approval of Hon'ble Commission for any transmission projects above Rs. 10 Cr. which OPTCL has been following scrupulously.

**Rejoinder to Para 19:**

Since the creation of a transmission infrastructure requires huge investments, OPTCL always request state Government for financial support. State Govt. has been





contributing 100% financial assistance in shape of grant/equity in case of non-remunerative and contributing 30% equity support in case of remunerative projects.

2. The objections not specifically admitted may be deemed to have been denied.

**PRAYER**

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of M/s. Tata Steel Limited, Athagarh while approving ARR and Transmission Tariff of OPTCL for FY 2025-26 & Truing up application for the FY 2023-24.

Bhubaneswar  
January 31, 2025

By the Applicant  
Through

*Prabeer Kumar Mallik*

Sr. GM (EI.), RT&C



Annexure-01

**Table 6.2  
Regional Transmission Losses  
Utilities  
2022-23**

Region	Energy Available in the Region (GWh)	Export to other Region (GWh)	Export to Nepal (GWh)	Export to Bangladesh (GWh)	Export to Bhutan (GWh)	Export to Myanmar (GWh)	Total Energy drawal by States/Utilities (GWh)	Transmission Losses (GWh)	Transmission Losses (%)
1	2	3	4	5	6	7	8	9 (2-3-4-5-6-7)	10((8/2)x100)
Northern Region	235784.74	3399.70	343.64	0.00	0.00	0.00	224171.69	7869.71	3.34
Western Region	282367.53	57344.05	0.00	741.34	0.00	0.00	215219.30	9062.84	3.21
Southern Region	173393.55	7625.46	0.00	3491.13	0.00	0.00	156314.82	5962.13	3.44
Eastern Region	134352.68	57191.16	314.03	7547.70	266.30	0.00	64506.41	4527.08	3.37
North Eastern Region	21117.54	4662.00	0.00	1039.50	38.47	9.81	14499.49	868.27	4.11

## STATEMENT OF FREE POWER OF CGPS FOR FY 2024-25

Sl. No.	CGP Stations	STATEMENT OF FREE POWER OF CGPS FOR FY 2024-25												TOTAL Injected (In Kwh)
		APRIL'24 Injected (In Kwh)	MAY'24 Injected (In Kwh)	JUN'24 Injected (In Kwh)	JULY'24 Injected (In Kwh)	AUG'24 Injected (In Kwh)	SEPT'24 Injected (In Kwh)	OCT'24 Injected (In Kwh)	NOV'24 Injected (In Kwh)					
1	IMFA	9,64,093	8,71,590	9,66,013	6,90,482	6,60,805	8,44,052	11,81,938	8,61,089	70,40,062				
2	NALCO	10,68,227	11,48,265	82,715	3,79,525	1,19,400	2,91,407	7,95,571	3,54,861	42,39,971				
3	ARATI STEELS	8,62,606	9,17,113	7,95,889	8,37,134	9,54,267	7,77,542	12,32,834	4,38,520	68,15,905				
4	Aryan Ispat Ltd.	1,89,004	75,496	94,374	1,28,766	75,923	1,18,270	1,13,984	93,094	8,88,911				
5	BPSL	55,93,922	73,91,485	59,86,547	47,02,977	55,65,774	84,85,797	73,22,641	56,03,633	5,06,52,776				
6	TATA BSL(BSL)	1,04,87,992	80,79,802	1,02,02,963	1,00,97,489	59,31,643	69,64,899	1,07,69,509	78,60,310	7,03,94,607				
7	DINABANDHU	-	-	28,262	5,86,618	7,74,738	6,15,824	3,96,009	4,16,635	28,18,086				
8	HINDALCO	12,76,300	13,30,670	13,48,750	14,65,620	15,47,850	13,96,940	14,27,620	15,00,550	1,12,94,300				
9	IFFCO	730	210	480	1,990	31,380	55,630	4,700	140	95,260				
10	JSL	10,68,260	10,39,500	12,65,930	8,91,100	7,64,870	7,70,640	9,64,040	11,83,350	79,47,690				
11	JSP	37,70,844	28,08,670	34,11,545	54,03,917	9,81,356	23,35,330	40,58,051	83,47,885	3,11,17,588				
12	BPPL	1,30,416	1,35,928	1,54,348	2,60,512	3,73,954	8,90,365	2,25,416	1,78,372	23,49,311				
14	MAITHAN	14,48,004	9,09,222	4,00,413	6,83,208	10,57,109	9,66,770	10,59,677	7,65,805	72,90,158				
15	NARBHERAM	2,01,659	58,238	1,03,200	-	56,914	2,25,360	1,47,510	2,39,699	10,32,580				
16	NINL	5,028	31	26,323	96,865	5,696	95,165	11,240	3,849	2,44,197				
17	MGM	1,82,571	1,45,479	2,35,893	2,52,226	2,21,855	2,06,940	3,12,429	2,19,178	17,76,571				
18	NAVA LTD.	4,20,921	4,75,773	6,19,574	5,53,073	7,28,331	5,59,808	4,39,361	5,28,169	43,25,010				
21	DALMIA CEMENT (OCL)	2,99,204	3,75,083	2,94,627	3,14,046	1,72,849	3,16,147	2,67,925	2,33,407	22,73,288				
22	Debtor (Dalmia Kapitas)	66,891	69,910	60,865	80,334	1,19,485	1,63,380	86,986	65,883	7,13,734				
23	PATNAIK STEEL	2	1	1	-	14	-	460	5	483				
24	RSP	3,45,754	1,88,727	1,65,840	8,04,091	1,12,952	4,43,299	5,56,802	3,34,735	28,52,200				
25	MSP METALICS	1,59,426	-	75,880	1,66,416	1,11,304	1,39,010	1,22,197	1,67,099	9,41,332				
26	SHYAM METALICS	1,38,910	2,80,040	74,430	1,94,760	1,21,420	1,68,600	38,210	1,57,180	11,73,550				
27	TATA SPONGE	2,29,645	2,60,280	1,46,805	2,05,081	3,30,178	4,44,025	2,84,981	3,81,790	22,82,786				
28	VAL JHARSUGUDA	2,30,917	3,43,139	2,62,600	2,42,700	2,30,926	4,54,063	5,40,147	3,10,124	26,14,616				
29	VAL LANJIGARH	2,75,100	4,13,880	6,10,070	7,13,440	6,33,460	7,86,250	8,79,780	6,37,430	49,49,410				
30	VISA	7,71,061	10,05,163	9,47,300	2,69,420	30,61,941	12,17,292	14,18,462	12,09,048	96,30,267				
31	OSISL	7,65,935	4,69,738	3,29,024	5,23,439	3,70,361	3,70,361	5,48,210	3,71,584	36,47,711				
34	SHREE GANESH	1,00,210	1,55,053	2,54,522	3,41,391	4,46,352	4,17,582	4,09,942	10,46,114	31,71,166				
35	FACOR	2,65,677	5,50,814	7,41,583	8,52,098	6,34,255	7,53,202	8,37,072	7,47,334	53,82,035				
36	ADITYA(LAPANGA)	6,78,480	8,25,910	8,25,390	7,56,250	8,02,740	7,21,920	8,59,310	7,69,820	62,39,820				
37	Arcellor Mittal Nippon Steel	4,772	90,245	99,500	1,11,325	65,628	29,951	55,182	58,708	5,15,311				
38	BEL	2,10,320	2,69,476	2,62,673	2,75,829	2,49,068	1,95,433	2,25,838	1,87,062	18,75,699				
40	Viraj steel	6,27,076	8,81,557	8,63,335	11,05,979	7,99,391	62,967	5,69,458	5,82,286	54,92,049				
41	RUNGTA MINES DSP	30,64,885	34,10,700	31,31,957	33,01,927	26,70,196	33,64,501	33,82,666	27,08,923	2,50,35,755				
42	Runga mines(Badbil)	5,57,936	6,40,070	5,87,227	3,86,202	2,21,501	4,01,154	3,09,846	4,97,457	36,01,393				
43	Runga mines(Kamanda steel ltd.)	12,15,441	1,23,304	1,604	16,842	2,98,357	3,89,125	44,787	18,658	21,08,118				
44	SMC JHARSUGUDA	4,28,253	5,30,964	5,22,235	5,29,910	4,25,823	4,82,690	6,53,975	2,05,400	37,79,250				
45	SMC BADMAL	2,11,681	1,87,531	4,95,089	4,79,752	4,68,993	4,71,241	4,18,625	1,30,510	28,63,432				
46	ABREL	35,599	53,714	33,667	42,270	38,116	38,364	35,739	27,841	3,05,310				
47	KJS ALUWALIA	2,42,458	-	26,81,937	8,05,113	10,75,172	3,71,659	6,54,355	11,680	58,42,374				

48	SHREE CEMENT	43,307	77,658	1,48,698	1,72,642	2,11,054	2,05,650	1,46,729	93,075	10,98,813
49	JAGANNATH POWER	4,31,538	6,59,109	7,10,884	8,95,731	9,60,536	4,04,745	6,09,344	7,82,263	54,54,150
50	ABREL KHAJURIAKATA	7,74,171	55,849	45,539	74,081	72,652	56,116	50,496	44,857	11,73,761
51	THAKUR PRASAD					7,00,673	1	5	1	7,00,680
53	ADHUNIK METALICS								5,93,528	5,93,528
54	OCL								5,70,453	5,70,453
	TOTAL CGP	3,98,45,226	3,73,05,387	4,00,96,511	4,01,69,132	3,54,10,340	3,84,69,467	4,44,70,009	4,15,39,394	31,73,05,466
	TOTAL (MU)	39.85	37.31	40.10	40.17	35.41	38.47	44.47	41.54	317.31

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Loading pattern corresponding to the peak demand of 6928 MW (including Vedanta drawal) on 19-JUNE-2024 AT 16:00 hrs			
FEEDER NAME	MW	Rated Capacity in MW	% Loading
400KV MENDHASAL - PANDIAVAL2	50.43		
400KV MERAMUNDALI-BOL_PG	0.00		
400KV MERAMUNDALI-KANIHA1	-637.76		
400KV MERAMUNDALI-KANIHA2	-385.39		
400KV INDRAVATI ICT1	-67.47		
400KV INDRAVATI ICT2	-66.91		
400KV MERAMUNDALI-BOL_PG	0.00		
400KV DUBNW- KALABADIA	-368.96		
400KV_OPGC-JHARS_PG - 1	230.36		
400KV_OPGC-JHARS_PG - 2	150.50		
MENDHASAL -PANDIAVIL 1	49.34		
DUBNW- PANDIAVAL	75.67		
VEDANTA-JHARSUGUDA1 PG	-40.51		
VEDANTA-JHARSUGUDA2 PG	-40.23		
220KV JODA-JAMSHEDPUR	5.54	192	3%
220KV JODA-RAMCHANDRAPUR	-156.72	192	86%
KATAPALLI2-BOLAN PG	0.00	192	0%
SADEIPALLI2-BOLAN PG	-127.65	192	70%
220KV RENGALI-RENGALI PG 1	24.96	192	14%
220KV RENGALI-RENGALI PG 2	9.33	192	5%
220KV RENGALI-KANIHA	-132.61	192	73%
220KV TTPS-KANIHA	136.08	192	75%
220KV MERAMUNDALI-KANIHA 1	-107.71	192	59%
220KV MERAMUNDALI-KANIHA 2	-103.58	192	57%
220KV JAYANAGAR-JEPORE PG 1	-22.71	192	12%
220KV JAYANAGAR-JEPORE PG 2	-23.86	192	13%
220KV BUDHIPADAR-KORBA 1	-4.14	192	2%
220KV BUDHIPADAR-KORBA 2	-2.92	192	2%
220KV BUDHIPADAR-KORBA 3		192	0%
220KV TARKERA-BISRA 1	-201.68	350	61%
220KV TARKERA-BISRA 2	-205.17	350	62%
132KV KALABADIA-BANGIRIPOS	62.92	76	87%
132KV KALABADIA-BARIPADA	66.95	76	93%
220KV KALABADIA-BALASORE 1	176.81	192	97%
220KV KALABADIA-BALASORE 2	177.28	192	97%
NET - KALABADIA DRAWL	-916.91		
ATRI_AUTO-1	98.39	160	65%
ATRI_AUTO-2	98.61	160	65%
BALAS AUTO1	-77.17	160	51%
BALAS AUTO2	-76.75	160	50%
BALAS_AUTO-3	-76.34	160	50%
BHADR AUTO1	0.00	100	0%
BHADR AUTO2	91.01	160	60%
BHADR_AUTO-3	91.84	160	60%

BHANJ AUTO1	53.54	160	35%
BHANJ AUTO2	47.17	160	31%
BIDAN AUTO1	-54.85	100	58%
BIDAN AUTO2	0.00	100	0%
BIDAN AUTO3	23.75	160	16%
BOLNW AUTO1	67.28	160	44%
BOLNW AUTO2	70.89	160	47%
BOLNW_AUTO-3	66.65	160	44%
BUDHI AUTO1	92.49	160	61%
BUDHI AUTO2	52.98	160	35%
BURLA AUTO1	35.41	100	37%
BURLA AUTO2	35.34	100	37%
BURLA_AUTO-3	53.04	160	35%
CHAND AUTO1	56.32	100	59%
CHAND AUTO2	97.51	160	64%
CHAND AUTO3	60.82	100	64%
CHAND AUTO4	94.03	160	62%
DUBURI AUTO1	58.66	160	39%
DUBURI AUTO2	56.70	160	37%
DUBURI AUTO3	37.08	100	39%
GODA_AUTO-1	30.13	160	20%
GODA_AUTO-2	30.47	160	20%
JAYAN AUTO1	47.72	160	31%
JAYAN AUTO2	40.76	160	27%
JODA AUTO1	64.76	160	43%
JODA AUTO2	65.89	160	43%
JODA AUTO3	53.73	100	57%
LAPAN_AUTO-1	81.15	160	53%
LAPAN_AUTO-2	81.07	160	53%
MERAM AUTO1	39.55	100	42%
MERAM AUTO2	38.57	100	41%
MERAM AUTO3	37.43	100	39%
NAREN AUTO1	0.00	160	0%
NAREN AUTO2	0.00	160	0%
NAREN AUTO3	0.00	100	0%
PARAD AUTO1	-46.12	100	49%
NAYAG POWXFMR1	22.55		
NAYAG POWXFMR2	13.44		
NAYAG POWXFMR3	-22.16		
TATAPOWER1	-4.60		
TATAPOWER2	-2.02		
VAL DRAWAL	-959.45		
VEDANTA IPP	499.41	600	88%
ATRI-PANDIAVIL-1	-107.98	192	59%
BHOGRAI-KUCHEI	-29.34	76	41%
JALESWAR-KUCHEI	-40.58	76	56%
ADITYA_LOAD	0.00		
INFA-THERU	37.25	76	52%
ATRI-PANDIAVIL-2	-108.85	192	60%
220KV_KJHAR_GR -KEONJ_PG - 1	-11.58		

220KV_KJHAR_GR -KEONJ_PG - 2	-11.75		
LAXMIPUR_POWER TRANSFORMER	2.97	20	16%
PARAD AUTO2	-74.20	160	49%
PARAD AUTO3	-67.87	160	45%
TARKE AUTO1	50.91	100	54%
TARKE AUTO2	52.13	100	55%
TARKE AUTO3	51.04	100	54%
TARKE AUTO4	0.00	100	0%
THERU AUTO1	-22.22	100	23%
THERU AUTO2	21.45	100	23%
TTPS AUTO1	411.78		
TTPS AUTO2	0.00		
BOLNW_BOLAN_PG-2	-127.65	192	70%
132 KV ANAND_BAITARANI PWR	-0.03		
220 KV_NAREN_TATA GOPALPUR FDR-1	0.00	192	0%
220 KV_NAREN_TATA GOPALPUR FDR-1	3.32	192	2%
220 KV_JAYAN_JEYPO FDR-3	-20.90	192	11%
220 KV_JAYAN_JEYPO FDR-4	-23.87	192	13%
KESINGA - BOLANGIR PG	-60.98	192	33%
PRATAPSASAN-PANDIAVIL - 1	-111.61	192	61%
PRATAPSASAN-PANDIAVIL - 2	-111.83	192	61%
220 BUDHIPADAR - SMC 1	-13.22	192	7%
132 LAPAN - SMC	21.64	76	30%
132KV JODA-KENDUPOSI	22.42	76	31%

**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION**  
**Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur**  
**Bhubaneswar-751021**

**Case No: 93/2024**  
**Filing No: 1**

**IN THE MATTER OF:**

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**AND**

**IN THE MATTER OF:**

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022.

**... Applicant**

**AND**

**IN THE MATTER OF:**

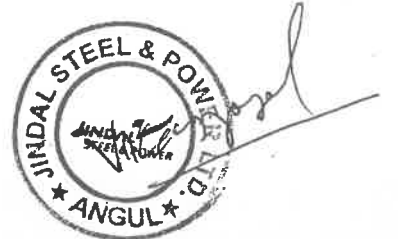
M/s. Jindal Steel & Power Limited, Chhendipada Road, SH 63, PO: Jindal Nagar, Angul, Odisha: 759111

**...Respondent**

**The humble respondent above named most respectfully submit as under:**

1. The Objector, M/s. Jindal Steel & Power Limited (JSPL), being a Company incorporated under Companies Act 1956 and having its Registered Office at O.P. Jindal Nagar, Hisar, 125005, Haryana, having plant site at Chhendipada Road, SH-63, Jindal Nagar, PIN-759111, Dist-Angul, Odisha is consumer of TPCODL and connected with OPTCL Grid Substation at Meramunduli through a 400 kV Double Circuit Line.
2. JSPL is submitting the following points on the application of OPTCL for determination of Annual Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 for kind review and necessary action by the Hon'ble Commission.

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### 3. Determination of Transmission Charges

OPTCL has given the proposal for transmission charges @ **36.08 P/U** for FY 2025-26 against 24 P/Unit as approved by the Commission during FY 2024-25. The proposed Transmission Tariff of **36.08 P/U** is very high and should not be permitted. This will adversely affect the RST of the DISCOMS and will be a huge burden on the consumers of Odisha.

### 4. Transmission Loss:

OPTCL has proposed transmission loss at 3.05%. In conformity with the power sector reform, OPTCL needs to reduce the transmission loss significantly.

However, in the neighbouring states such as Andhra Pradesh, where almost similar type of network configuration is available, the Electricity Regulatory Commission has considered the lower limit of intra-state transmission loss for the FY 2023-24 at the level of 2.80%. Further, the transmission losses approved by the respective Electricity Regulatory Commissions for other neighbouring states like West Bengal, Madhya Pradesh, Bihar, and Chhattisgarh with similar types of infrastructure are in the range of 2.23% to 3%.

In page 229, OERC Form T-6, OPTCL has considered gross input at 22625.18 MU and gross output 21925.96 MU for the period April 2024 to September 2024. Thus, the total loss for 6 months is 699.23 MU. However, it may be noted that a CGP of capacity 250 MW inject around 25 MU in a financial year to OPTCL grid as inadvertent injection. Now, considering operating capacity of CGP in Odisha at 9850 MW, the estimated inadvertent injection to OPTCL grid will be around 985 MU. Hence, in a period of six months the average inadvertent injection will be 492.5 MU. Thus, the reported transmission loss of OPTCL of 699.23 MU in six months is incorrect and is based on without any third party audit. If we account for the CGP inadvertent injection, then the loss will be around 699.23 MU - 492.5 MU = 206.73 MU. Thus, the OPTCL transmission loss will be around 0.91%. In view of the above submission, it is prayed before the Hon'ble Commission to consider the above and accordingly re-calculate and approve transmission loss at 0.91%.

5. That OPTCL have not yet identified the areas where loss is maximum and OPTCL need to formulate action plans for loss reduction. OPTCL should inform the methodology adopted to estimate the transmission loss for every year. OPTCL should have undertaken energy audits of lines and substations to know the quantum of transmission loss in the system. Proposing the transmission loss arbitrarily without giving the breakup of the losses in different components of transmission system i.e., lines, substations, power transformers and auto transformers etc are not appropriate for the S.T.U. Thus proposing loss as per the

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business plan is meaningless. There is enough measure by which OPTCL could reduce the Transmission loss. OPTCL should conduct energy audits and their standard performance should be monitored by a third party auditor appointed by the Commission so as to assess the actual performance of the licensees.

6. That earlier CGPs used to inject inadvertent power to the grid and GRIDCO availed the benefits of inadvertent power. GRIDCO also used to pay the hydro pool cost towards the inadvertent power. However, from FY 2019-20 onwards GRIDCO has stopped making payment towards inadvertent injections. Hence, OPTCL become the ultimate beneficiary of such injection of inadvertent power. We pray to Hon'ble Commission to direct OPTCL to submit the detail list of inadvertent injection for each month by each CGP and consider the same as an additional injection to the grid accordingly calculate the transmission loss. The data of inadvertent injection is available with OPTCL and SLDC for each month for each CGP who are connected to EHT transmission system of OPTCL. The entire stakeholder and consumers of Odisha will be benefitted by such methodology as the intra-state transmission loss will reduce significantly.

**Open Access Charges:**

In order to have an insights on the loading of existing transmission systems corresponding to the system peak demand of 6927.78 MW as touched in the month of June 2024. Each year Hon'ble OERC informed OPTCL to submit 400 kV, 220 kV, 132 kV Power Transformer and EHT lines loading. OPTCL should make a practice to submit the Power flow data for 400 kV, 220 kV line and 132 kV line and its loading and the entire Auto-transformer loading, Power Transformer and ICT loading along with the ARR application. Moreover by only submitting only power transmitted on the peak demand day will not solve the purpose. In order to ascertain the margin availability, OPTCL may be directed to submit the maximum power handling capability, power flow and % loading of all the 400 kV, 220 kV, 132 kV line and Power Transformer, Auto Transformer, ICT Transformers. It is also desired that OPTCL should conduct load flow analysis to handle around 2000-3000 MW differential load in appropriate manner.

Once these data are made available, it can be ascertained that, there are sufficient margin is available in the transmission network and in order to utilize it fully, STOA should be promoted and the charges for the same may be kept at 1/4 of the MTOA and LTOA charges and necessary amendments in the regulations may be made.

**8. Introduction of Reactive Energy Charges:**

OPTCL has proposed to introduce Reactive Energy Charges of 3 Paise / KVARh which is very high and should be reduced in consultation with various stakeholders.



**9. Levy of Grid Support Charge for connectivity:**

OPTCL has submitted an application to the Hon'ble OERC on 26.06.2024, to determine and approve the imposition of Grid Support Charges for industries with Captive Generating/Cogeneration plants that operate alongside the OPTCL grids.

The case was registered as OERC Case No.-44/2024. In an order dated July 6, 2023, the High Court suggested that if OPTCL wishes to pursue the imposition of Grid Support Charges, they should file a separate application with the OERC. The court emphasized that the OERC, under Section 181 of the Electricity Act, should examine the justifiability of such charges. Hon'ble Commission in order dated 09.07.2024 in case no 44 of 2024 has directed OPTCL to submit a consolidated report considering certain queries. Therefore, the proposal of OPTCL to levy of Grid Support Charge for FY 2025-26 for connectivity may be rejected.

**PRAYER**

In the facts and circumstances stated above and in the interest of the parties and the larger interest of the State the Hon'ble Commission be pleased to pass appropriate orders to the effect that

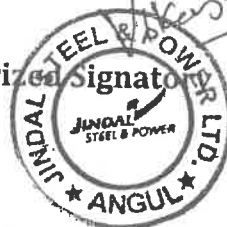
1. ARR of OPTCL may be approved accordingly based on the submission made above.
2. The Transmission Charges should be limited to 17 P/Unit.
3. Transmission loss to be reduced considering the submission made for FY 2025-26.
4. Proposal of Reactive energy charges of 3 paise/KVARh should be reduced.
5. Proposal of OPTCL to levy of Grid Support Charge for connectivity may be rejected.
6. Each year truing up exercise and business plan approval should be carried out by Hon'ble commission through a process of public hearing.

**Place: Bhubaneswar**

**For M/s. Jindal Steel & Power Limited.**

**Date: 14.01.2025**

**Authorized Signatory**



BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur  
Bhubaneswar-751021

Case No: 93/2024  
Filing No: 1

IN THE MATTER OF:

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND

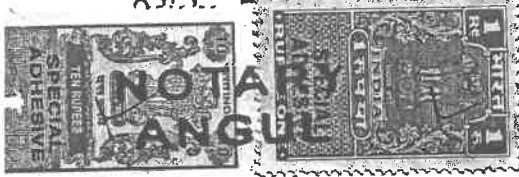
IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022

... Applicant

AND

M/s. Jindal Steel & Power Limited, Chhendipada Road, SH-63, PO: Jindal Nagar, Angul,



Affidavit NO. 465/2025

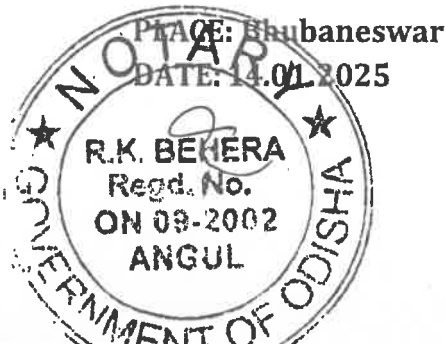
Dated 15.01.2025

....Respondent

AFFIDAVIT IN SUPPORT

I, Shri Vikas Goyal, son of Shri Satya Bhusan Goyal, aged about 55 years, working as Vice President - Central (Electrical) in Jindal Steel & Power Limited, Chhendipada Road, SH 63, PO: Jindal Nagar, Angul, Odisha: 759111 do solemnly affirm and state as follows :-

1. That I am the Vice President - Central (Electrical) in Jindal Steel & Power Limited and I am duly authorized to swear this affidavit on its behalf.
2. The statements made in the petition are based on information and I believe them to be true.



ROHITA KUMAR BEHERA  
NOTARY  
ANGUL, ODISHA  
Regd. No- ON 09- 2002  
Call- 9439737146

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BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur  
Bhubaneswar-751021

Case No: 93/2024

Filing No: 1

IN THE MATTER OF:

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022

... Applicant

AND

M/s. Jindal Steel & Power Limited, Chhendipada Road, SH 63, PO: Jindal Nagar, Angul, Odisha: 759111

....Respondent

Letter of Authorization

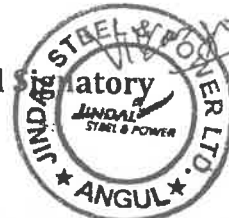
I, Shri Vikas Goyal, working as Vice President - Central (Electrical) in Jindal Steel & Power Limited, Chhendipada Road, SH 63, PO: Jindal Nagar, Angul, Odisha: 759111 hereby authorize Sri Bibhu Swain, residing at K-8-82, Kalinga Nagar, Ghatikia, Bhubaneswar-751029 to be my representative to present the above case on my behalf before the Hon'ble Odisha Electricity Regulatory Commission relating to my above reply and to submit any additional submission, memos, documents etc. as may be required and in general do all such thing as may be required in connection with the above reply.

For M/s. Jindal Steel & Power Limited

Place: Bhubaneswar

Date: 14.01.2025

Authorized Signatory



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BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
PLOT NO. 4, CHUNAKOLI, SAILESHREE VIHAR,  
CHANDRASEKHARPUR, BHUBANESWAR-751021

CASE NO. 93/2024  
FILING NO. 3

**IN THE MATTER OF:** (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**And**

(ii) Truing up application for the FY 2023-24 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

**AND**  
**IN THE MATTER OF:** Odisha Power Transmission Corporation Limited, Janpath,  
Bhubaneswar

..... Applicant

**vrs**

**M/s. Jindal Steel & Power Limited**, Chhendipada Road, SH  
63, PO: Jindal Nagar, Angul, Odisha: 759111 and 15 others.

..... Objectors

**Rejoinder to the objections raised by the Objector M/s.  
Jindal Steel & Power Limited.**

The humble applicant above named

**MOST RESPECTFULLY SHEWETH:**

1. That the Objector M/s. Jindal Steel & Power Limited vide affidavit dated 14.01.2025 has raised certain submissions on ARR & Transmission Tariff Application of



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Prabeer Kumar Mallik

OPTCL for FY 2025-26 and Truing up application for the FY 2023-24. In reply, OPTCL submits its rejoinder to the submissions in the following paragraphs.

**Rejoinder to Para 3:**

**Determination of Transmission Charges:**

The Transmission infrastructures are created considering the demand and request of the DISCOMs from time to time, after due approval from the Hon'ble OERC through Transmission Plan. Being a Transmission License, OPTCL has always endeavored to create the Transmission infrastructure for providing reliable and quality power to the consumers of DISCOMs. Accordingly, every year OPTCL is adding more transmission assets to meet the requirement of DISCOMs. Transmission Charge is arrived at 36.08 paise per unit by dividing the total ARR of OPTCL with the recent realistic MU projections of DISCOMs and recovered from them on a monthly basis. This rate will decrease if DISCOMs drawal increase. Alternatively, OPTCL is proposing to recover the Transmission charges on a monthly basis, based on the recent realistic MU projections of DISCOMs, **irrespective of the drawal.**

The proposed Transmission Charge of 36.08 p/u has been derived by considering the recent realistic energy demand projections of 38764.29 MU as communicated by the DISCOMs & other LTOA customers and the ARR figures have been arrived by OPTCL justifying component wise projections as per the provisions contained in OERC Transmission Tariff Regulations, 2014, OPTCL's Audited Accounts for FY 2023-24, all relevant data/information and materials. The details of projections are submitted in page 51-52 of the present ARR application of OPTCL for FY 2025-26. Moreover, OPTCL had furnished all requisite information and details as per the prescribed formats of the Hon'ble Commission with full justifications.

Hence, mere apprehension of the respondent towards imposition of excessive burden on Discoms seems to be inappropriate and unacceptable which is likely to be rejected at this juncture. Moreover, the contention of the stake holder operating in the value chain of electricity needs to appreciate the fact that the cost recovery has to be in full so as to make the sector sustainable.

Hence, OPTCL does not agree with the views of the Objector.

**Rejoinder to Para 4 to 6:**

**Transmission Loss**

First of all, the proposal to approve transmission loss of OPTCL at 2.5% is baseless and without any study.



The actual transmission loss for the period **Apr' - Sep' 2024** is calculated to be **3.09%** as shown in the ARR & TT application for FY 2025-26 (page-229). This figure is **less than the actual** transmission loss during last year i.e. **3.11%** for **FY 2023-24**. In fact, OPTCL had projected Transmission loss of 3.05% for FY 2024-25, but Hon'ble Commission had set a target of 3.00% which could not be achieved yet.

In OPTCL system, the transmission loss is purely technical loss and a function of real time injection of power by a number of generators, system configuration and power flow requirements at different load centers. It depends on many parameters / factors such as distance and mismatch between generation and load centers, types of load, reactive power compensation, voltage profile, seasonal variation of demand load etc. Thus, OPTCL does not have much control over the same at any point of time. The transmission system of OPTCL operates as an integral part of the Eastern Region Grid to serve the internal demand of the State as well as to carry out import and export of power depending upon the system demand.

As of the matter of fact, some grid s/s and lines are being constructed in many remote and deprived areas funded under Central & State Govt. schemes in the interest of public. Additional length in EHT lines and Sub-stations in under-loaded areas are also responsible for increase in transmission loss.

The Transmission Loss in OPTCL network is in a gradually reducing trend over the years i.e. from 3.73% during 2014-15 to 3.11% in 2023-24 and has remained 3.09% within 1<sup>st</sup> six months of FY 2024-25 mainly due to addition of infrastructure and various system strengthening works taken up by OPTCL. The actual losses incurred over the years by OPTCL have been within the margin allowed by Hon'ble Commission up to the year FY 2017-18. However in FY 2018-19, the commission set the loss at 3.00% though the projected transmission loss was at 3.25% and thereafter the commission has been pegging the transmission loss at the same level though loss projected by OPTCL remained in a downward trend.

Year	Tr. Loss proposed	OERC Approval	Actual
2014-15	3.75%	3.75%	3.73%
2015-16	3.75%	3.75%	3.67%
2016-17	3.70%	3.70%	3.58%
2017-18	3.50%	3.50%	3.34%
2018-19	3.25%	3.00%	3.28%
2019-20	3.25%	3.00%	3.25%
2020-21	3.20 %	3.00%	3.22%
2021-22	3.15%	3.00%	3.18%
2022-23	3.10%	3.00%	3.15%



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Pooja Kumar Mallick



2023-24	3.10%	3.00%	3.11%
2024-25	3.05%	3.00%	3.09% (1 <sup>st</sup> six months )

From the table given above, it is also clear that each year upto FY 2017-18, the transmission loss achieved by OPTCL has remained at a level lower than the approved figures by Hon'ble commission and from FY 2018-19 the target set by OERC appears to be very stiff which was hard to achieve though **the trend of lesser transmission loss year after year has been achieved.**

That the transmission losses depend upon the voltage level at which the power is transmitted. The transmission losses are higher where the percentage of lower voltage (132kV or below) transmission system is higher. A comparison of the average transmission losses of a few state transmission licensees and their corresponding transmission assets at low voltage level (132 kV) is shown below.

**TRANSMISSION LOSS (%) OF OTHER STATES OF LOW VOLTAGE LINES UPTO 132KV FOR FY 2023-24**

States	% of Low voltage Lines (up to 132 kV)			Actual Transmission Losses for FY 2023-24 (%)
	Transmission Lines up to 132kV (Ckm)	Total Transmission Lines (Ckm)	% of Transmission Lines up to 132kV	
Odisha (OPTCL)	8479.831	16508.068	51.36%	3.11
Uttar Pradesh (UPPTCL)	28733	60145	47.77%	3.22
Gujarat (GETCO)	44512	73054	60.93%	3.83

It may be kindly be appreciated that the transmission loss (technical) is bound to happen as per law of physics and is very difficult to reduce after a certain level. Also, at all India level, the transmission loss of utilities have remained at more than 3.00% and to suffice our view point the table is given below for kind appreciation of Hon'ble Commission.

**Transmission loss of Different states for FY 2023-24**

Name of states	Tr. loss approved by State Commission	Actual Tr. loss
Uttar Pradesh (UPPTCL)	3.22%(UERC)	3.22%
Gujarat (GETCO)	3.60% (GERC)	3.83%



Assam (AEGCL)	3.30%(AERC)	3.30%
Rajasthan (RVPN)	4.50%(RERC)	4.23%
Himachal Pradesh (HPPTCL)	3.19% (HERC)	3.25%

All India average transmission loss for the period 06-01-2025 to 12-01-2025 as published by Grid Controller Of India Limited, National Load Despatch Centre dated 18.01.2025 is 4.00 %. Further, as per the CEA General Review 2024 (Containing Data for the Year 2022-23) the transmission loss of Eastern Region is 3.37% (attached as **Annexure-01**). Present transmission loss level of OPTCL is much less than both the said cases (i.e. Grid Controller Of India Limited & CEA General Review 2024).

However, as a responsible Transmission utility, OPTCL is making an all-out effort to reduce the transmission loss further by undertaking various **system operation and loss reduction measures** by implementing the emerging technologies like **system Automation**, load bifurcation, **modification in system configuration**, procurement of more efficient equipment, **Digitalization of grids** by using SAS, Protection system improvement using Busbar protection and Event Logger, **Conversion of Radial to Ring system**, Advanced Metering Infrastructure etc. to bring it to **3.05% by FY 2025-26**.

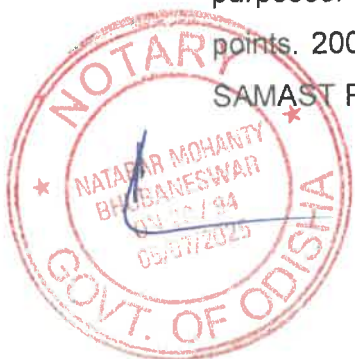
**Regarding inadvertent power**

OPTCL does not agree to the assumption of the respondent that around 985MU of inadvertent power will be injected in OPTCL system in a year considering the CGP capacity 9850MW. In this regard it is submitted that during the last six months, it is observed that total inadvertent power injection is 239.38MU which has been already considered while calculating the Transmission loss of 3.09% in form T-6. Hence, Transmission loss as suggested by the Objector is not just and proper. Details of inadvertent power injected by CGPs in FY 2024-25 till November is attached as **Annexure-02**.

Further, it is submitted that Transmission charge is being computed on Open access transactions based on scheduled energy. Hence, OPTCL does not reap any benefit out of inadvertent power.

**Steps taken for Energy Audit**

Around 2600 nos. of 0.2s Accuracy Class ABT Energy meters are required for different metering points at all Grid Substations of OPTCL for billing and audit purposes. 538 nos. of meters have been installed by OPTCL at different metering points. 2000 nos. energy meters will be installed at different Grid Substations under SAMAST Project, out of which 70 nos. meters have been installed and the installation



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Poojbeer Kumar Mallik

process of balance meters are in progress. The installation of energy meters for balance metering points under **SAMAST** Project will be completed by 31st October 2025. After installation of the meters, energy audit and calculation of transmission losses of OPTCL on an element-wise at different voltage levels will be feasible.

**Rejoinder to Para 7:**

**Open Access Charges:**

That the system peak demand of 6927.78 was touched on dated.19.10.2024. Statement on the loading pattern of the existing transmission system (400kV, 220kV, 132kV power transformers and EHT lines) corresponding to the peak demands is attached as **Annexure-03**. OPTCL has already conducted load flow study considering different load scenario i.e Summer peak, Winter lean, High hydro, Low Hydro & Solar Peak, in the Revised 14th Intra-state Transmission Plan of Odisha for FY 2022-23 to FY 2026-27, which has been approved by Hon'ble Commission vide case no. 08/2024. In the aforesaid report percentage loading of all Transmission line, ICT, Auto & Power Transformers till FY 2026-27 have been mentioned. The Transmission infrastructures are created considering the demand and request of the DISCOMs from time to time, after due approval from the Hon'ble OERC through Transmission Plan and the DISCOMs and other LTOA customers are responsible to bear the full approved ARR of OPTCL. STOA charges is being charged as per the Open Access Regulations, 2020.

**Rejoinder to Para 8:**

**Reactive Energy Charges:**

As per Regulation 31(1) under Chapter-7 (IMBALANCE AND REACTIVE ENERGY CHARGES) of the OERC (Terms and Conditions of Intra-State Open Access) Regulations, 2020, payment for the reactive energy charges by open access consumers shall be in accordance with provisions stipulated in the State Grid Code or as may be specified in relevant regulations/orders of the Hon'ble Commission .

The Hon'ble Commission in Para 16 (page 5) of the order dated 05.02.2019 in Case No. 50/2017 has inter alia viewed that the provisional reactive energy charges of 3 paise/KVARh as allowed in the ARR order of OPTCL for FY 2018-19 continue for time being till a final justification is submitted by OPTCL in consultation with the stakeholders. However, OPTCL **has not realized any revenue** from Reactive Energy Charges so far.

In view of the above, OPTCL proposes that 3paise/KVARh may be approved provisionally as Reactive Energy Charges for FY 2025-26.



Hence, the proposal of objector to reduce the reactive energy charges as suggested by OPTCL is not just and proper.

**Rejoinder to Para 9:**

**Levy of Grid Support Charge for connectivity:**

The benefits derived by the CGPs with co-located loads are enormous. The benefits are in the nature of ancillary services which are not paid till now. The Grid support charges (GSC)/Parallel operation charge has been levied by different state Regulatory Commissions and upheld by APTEL and Supreme Court of India through various orders and hence proposed by OPTCL through a separate petition. Recently, OPTCL had filed an application (case No. 44 of 2024) on 26.06.2024 for determination and approval for levy of Grid Support Charges for industries having Captive Generating / Cogeneration plants and running in parallel with the Grids of OPTCL. Hon'ble Commission in its order directed OPTCL to submit a consolidated report considering the observations/queries raised by the stakeholders in the earlier Cases filed by OPTCL. In compliance to above, OPTCL is in final stage of preparation of the required consolidated report and will be submitted before Hon'ble Commission shortly.

2. The objections not specifically admitted may be deemed to have been denied.

**PRAYER**

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of M/s. Jindal Steel & Power Limited while approving ARR and Transmission Tariff of OPTCL for FY 2025-26 & Truing up application for the FY 2023-24.

Bhubaneswar  
January 31, 2025

By the Applicant  
Through

*Prabir Kumar Mallick*

Sr. GM (EI.), RT&C



**Table 6.2**  
**Regional Transmission Losses**  
**Utilities**  
**2022-23**

Region	Energy Available in the Region (GWh)	Export to other Region (GWh)	Export to Nepal (GWh)	Export to Bangladesh (GWh)	Export to Bhutan (GWh)	Export to Myanmar (GWh)	Total Energy drawal by States/Utilities (GWh)	Transmission Losses (GWh)	Transmission Losses (%)
1	2	3	4	5	6	7	8	9 (2-3-4-5-6-7)	10((8/2)x100)
Northern Region	235784.74	3399.70	343.64	0.00	0.00	0.00	224171.69	7869.71	3.34
Western Region	282367.53	57344.05	0.00	741.34	0.00	0.00	215219.30	9062.84	3.21
Southern Region	173393.55	7625.46	0.00	3491.13	0.00	0.00	156314.82	5962.13	3.44
Eastern Region	134352.68	57191.16	314.03	7547.70	266.30	0.00	64506.41	4527.08	3.37
North Eastern Region	21117.54	4662.00	0.00	1039.50	38.47	9.81	14499.49	868.27	4.11

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SL. No.	CGP Stations	STATEMENT OF FREE POWER OF CGPS FY 2024-25												TOTAL Injected (In Kwh)
		APRIL'24 Injected (In Kwh)	MAY'24 Injected (In Kwh)	JUN'24 Injected (In Kwh)	JULY'24 Injected (In Kwh)	AUG'24 Injected (In Kwh)	SEPT'24 Injected (In Kwh)	OCT'24 Injected (In Kwh)	NOV'24 Injected (In Kwh)					
1	IMFA	9,64,093	8,71,590	9,66,013	6,90,482	6,60,805	8,44,052	11,81,938	8,61,089	70,40,062				
2	NALCO	10,68,227	11,48,265	82,715	3,79,525	1,19,400	2,91,407	7,95,571	3,54,861	42,39,971				
3	ARATI STEELS	8,62,606	9,17,113	7,95,889	8,37,134	9,54,267	7,77,542	12,32,834	4,38,520	68,15,905				
4	Aryan Ispat Ltd.	1,89,004	75,496	94,374	1,28,766	75,923	1,18,270	1,13,984	93,094	8,88,911				
5	BPSL	55,93,922	73,91,485	59,86,547	47,02,977	55,65,774	84,85,797	73,22,641	56,03,633	5,06,52,776				
6	TATA BSL(BSL)	1,04,87,992	80,79,802	1,02,02,963	1,00,97,489	59,31,643	69,64,899	1,07,69,509	78,60,310	7,03,94,607				
7	DINABANDHU	-	-	28,262	5,86,618	7,74,738	6,15,824	3,96,009	4,16,635	28,18,086				
8	HINDALCO	12,76,300	13,30,670	13,48,750	14,65,620	15,47,850	13,96,940	14,27,620	15,00,550	1,12,94,300				
9	IFFCO	730	210	480	1,990	31,380	55,630	4,700	140	95,260				
10	JSL	10,68,260	10,39,500	12,65,930	8,91,100	7,64,870	7,70,640	9,64,040	11,83,350	79,47,690				
11	JSPL	37,70,844	28,08,670	34,11,545	54,03,917	9,81,356	23,35,330	40,58,051	83,47,885	3,11,17,598				
12	BPPL	1,30,416	1,35,928	1,54,348	2,60,512	3,73,954	8,90,365	2,25,416	1,78,372	23,49,311				
14	MATHAN	14,48,004	9,09,222	4,00,413	6,83,208	10,57,109	9,66,770	10,59,627	7,65,805	72,90,158				
15	NARBHERAM	2,01,659	58,238	1,03,200	-	56,914	2,25,360	1,47,510	2,39,699	10,32,580				
16	NINL	5,028	31	26,323	96,865	5,696	95,165	11,240	3,849	2,44,197				
17	MGM	1,82,571	1,45,479	2,35,893	2,52,226	2,21,855	2,06,940	3,12,429	2,19,178	17,76,571				
18	NAVA LTD.	4,20,921	4,75,773	6,19,574	5,93,073	7,28,331	5,59,808	4,39,361	5,28,169	43,25,010				
21	DALMIA CEMENT (OCL)	2,99,204	3,75,083	2,94,627	3,14,046	1,72,849	3,16,147	2,67,925	2,33,407	22,73,288				
22	Debtor (Dalmia Kapilas)	66,891	69,910	60,865	80,334	1,19,485	1,63,380	86,986	65,883	7,13,734				
23	PATNAIK STEEL	2	1	1	-	14	-	460	5	483				
24	RSP	3,45,754	1,88,727	1,65,840	8,04,091	1,12,952	4,43,299	5,56,802	3,34,735	29,52,200				
25	MSP METALICS	1,59,426	-	75,880	1,66,416	1,11,304	1,39,010	1,22,197	1,67,099	9,41,332				
26	SHYAM METALICS	1,38,910	2,80,040	74,430	1,94,760	1,21,420	1,68,600	38,210	1,57,180	11,73,550				
27	TATA SPONGE	2,29,645	2,60,280	1,46,805	2,05,081	3,30,178	4,44,025	2,84,981	3,81,790	22,82,785				
28	VAL JHARSUGUDA	2,30,917	3,43,139	2,62,600	2,42,700	2,30,926	4,54,053	5,40,147	3,10,124	26,14,616				
29	VAL LANJIGARH	2,75,100	4,13,880	6,10,070	7,13,440	6,33,460	7,86,250	8,79,780	6,37,430	49,49,410				
30	VISA	7,71,061	10,05,163	9,47,300	30,61,941	12,17,292	14,18,462	12,09,048	96,30,267	36,47,711				
31	OSISL	7,65,935	4,69,738	3,29,024	2,69,420	5,23,439	3,70,361	5,48,210	3,71,584	31,71,166				
34	SHREE GANESH	1,00,210	1,55,053	2,54,522	3,41,391	4,46,352	4,17,582	4,09,942	10,46,114	53,82,035				
35	FACOR	2,65,677	5,50,814	7,41,583	8,52,098	6,34,255	7,53,202	8,37,072	7,47,334	62,39,820				
36	ADITYA(LAPANGA)	6,78,480	8,25,910	8,25,390	7,66,250	8,02,740	7,21,920	8,59,310	7,69,820	5,15,311				
37	Arcelor Mittal Nippon Steel	4,772	90,245	99,500	1,11,325	65,628	29,951	55,182	58,708	18,75,689				
38	BEL	2,10,320	2,69,476	2,62,673	2,75,829	2,49,068	1,95,433	2,25,838	1,87,062	54,92,049				
40	Viraj steel	6,27,076	8,81,557	8,63,335	11,05,979	7,99,391	62,967	5,69,458	5,82,286	27,08,923				
41	RUNGTA MINES DSP	30,64,885	34,10,700	31,31,957	33,01,927	26,70,196	33,82,666	33,82,666	27,08,923	36,01,393				
42	Runga mines (Badbil)	5,67,936	6,40,070	5,87,227	3,86,202	2,21,501	4,01,154	3,09,846	4,97,457	21,08,118				
43	Runga mines(Kamanda steel ltd.)	12,15,441	1,23,304	1,604	16,842	2,98,357	3,89,125	44,787	18,658	37,79,250				
44	SMC JHARSUGUDA	4,28,253	5,30,964	5,22,235	5,29,910	4,25,823	4,82,690	6,53,975	2,05,400	28,63,432				
45	SMC BADMAL	2,11,681	1,87,531	4,95,099	4,79,752	4,68,993	4,71,241	4,18,625	1,30,510	3,05,310				
46	ABREL	35,599	53,714	33,667	42,270	38,116	38,364	35,739	27,841	58,42,374				
47	KJS ALUWALIA	2,42,458	26,81,937	26,81,937	8,05,113	10,75,172	3,71,659	6,54,355	11,680	58,42,374				

48	SHREE CEMENT	43,307	77,658	1,48,698	1,72,642	2,11,054	2,05,650	1,46,729	93,075	10,98,813
49	JAGANNATH POWER	4,31,538	6,59,109	7,10,884	8,95,731	9,60,536	4,04,745	6,09,344	7,82,263	54,54,150
50	ABREL KHAJURIAKATA	7,74,171	55,849	45,539	74,081	72,652	56,116	50,496	44,857	11,73,761
51	THAKUR PRASAD					7,00,673	1	5	1	7,00,680
53	ADHUNIK METALICS								5,93,528	5,93,528
54	OCL								5,70,453	5,70,453
	TOTAL CGP	3,98,45,226	3,73,05,387	4,00,96,511	4,01,69,132	3,54,10,340	3,84,69,467	4,44,70,009	4,15,39,394	31,73,05,466
	TOTAL (MU)	39,85	37,31	40,10	40,17	35,41	38,47	44,47	41,54	317,31

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<b>Loading pattern corresponding to the peak demand of 6928 MW (including Vedanta drawal) on 19-JUNE-2024 AT 16:00 hrs</b>			
<b>FEEDER NAME</b>	<b>MW</b>	<b>Rated Capacity in MW</b>	<b>% Loading</b>
400KV MENDHASAL - PANDIAVAL2	50.43		
400KV MERAMUNDALI-BOL_PG	0.00		
400KV MERAMUNDALI-KANIHA1	-637.76		
400KV MERAMUNDALI-KANIHA2	-385.39		
400KV INDRAVATI ICT1	-67.47		
400KV INDRAVATI ICT2	-66.91		
400KV MERAMUNDALI-BOL_PG	0.00		
400KV DUBNW- KALABADIA	-368.96		
400KV_OPGC-JHARS_PG - 1	230.36		
400KV_OPGC-JHARS_PG - 2	150.50		
MENDHASAL -PANDIAVIL 1	49.34		
DUBNW- PANDIAVAL	75.67		
VEDANTA-JHARSUGUDA1 PG	-40.51		
VEDANTA-JHARSUGUDA2 PG	-40.23		
220KV JODA-JAMSHEDPUR	5.54	192	3%
220KV JODA-RAMCHANDRAPUR	-156.72	192	86%
KATAPALLI2-BOLAN PG	0.00	192	0%
SADEIPALLI2-BOLAN PG	-127.65	192	70%
220KV RENGALI-RENGALI PG 1	24.96	192	14%
220KV RENGALI-RENGALI PG 2	9.33	192	5%
220KV RENGALI-KANIHA	-132.61	192	73%
220KV TTPS-KANIHA	136.08	192	75%
220KV MERAMUNDALI-KANIHA 1	-107.71	192	59%
220KV MERAMUNDALI-KANIHA 2	-103.58	192	57%
220KV JAYANAGAR-JEPORE PG 1	-22.71	192	12%
220KV JAYANAGAR-JEPORE PG 2	-23.86	192	13%
220KV BUDHIPADAR-KORBA 1	-4.14	192	2%
220KV BUDHIPADAR-KORBA 2	-2.92	192	2%
220KV BUDHIPADAR-KORBA 3		192	0%
220KV TARKERA-BISRA 1	-201.68	350	61%
220KV TARKERA-BISRA 2	-205.17	350	62%
132KV KALABADIA-BANGIRIPOS	62.92	76	87%
132KV KALABADIA-BARIPADA	66.95	76	93%
220KV KALABADIA-BALASORE 1	176.81	192	97%
220KV KALABADIA-BALASORE 2	177.28	192	97%
NET - KALABADIA DRAWL	-916.91		
ATRI_AUTO-1	98.39	160	65%
ATRI_AUTO-2	98.61	160	65%
BALAS AUTO1	-77.17	160	51%
BALAS AUTO2	-76.75	160	50%
BALAS_AUTO-3	-76.34	160	50%
BHADR AUTO1	0.00	100	0%
BHADR AUTO2	91.01	160	60%
BHADR_AUTO-3	91.84	160	60%



BHANJ AUTO1	53.54	160	35%
BHANJ AUTO2	47.17	160	31%
BIDAN AUTO1	-54.85	100	58%
BIDAN AUTO2	0.00	100	0%
BIDAN AUTO3	23.75	160	16%
BOLNW AUTO1	67.28	160	44%
BOLNW AUTO2	70.89	160	47%
BOLNW_AUTO-3	66.65	160	44%
BUDHI AUTO1	92.49	160	61%
BUDHI AUTO2	52.98	160	35%
BURLA AUTO1	35.41	100	37%
BURLA AUTO2	35.34	100	37%
BURLA_AUTO-3	53.04	160	35%
CHAND AUTO1	56.32	100	59%
CHAND AUTO2	97.51	160	64%
CHAND AUTO3	60.82	100	64%
CHAND AUTO4	94.03	160	62%
DUBURI AUTO1	58.66	160	39%
DUBURI AUTO2	56.70	160	37%
DUBURI AUTO3	37.08	100	39%
GODA_AUTO-1	30.13	160	20%
GODA_AUTO-2	30.47	160	20%
JAYAN AUTO1	47.72	160	31%
JAYAN AUTO2	40.76	160	27%
JODA AUTO1	64.76	160	43%
JODA AUTO2	65.89	160	43%
JODA AUTO3	53.73	100	57%
LAPAN_AUTO-1	81.15	160	53%
LAPAN_AUTO-2	81.07	160	53%
MERAM AUTO1	39.55	100	42%
MERAM AUTO2	38.57	100	41%
MERAM AUTO3	37.43	100	39%
NAREN AUTO1	0.00	160	0%
NAREN AUTO2	0.00	160	0%
NAREN AUTO3	0.00	100	0%
PARAD AUTO1	-46.12	100	49%
NAYAG POWXFMR1	22.55		
NAYAG POWXFMR2	13.44		
NAYAG POWXFMR3	-22.16		
TATAPOWER1	-4.60		
TATAPOWER2	-2.02		
VAL DRAWAL	-959.45		
VEDANTA IPP	499.41	600	88%
ATRI-PANDIAVIL-1	-107.98	192	59%
BHOGRAI-KUCHEI	-29.34	76	41%
JALESWAR-KUCHEI	-40.58	76	56%
ADITYA_LOAD	0.00		
INFA-THERU	37.25	76	52%
ATRI-PANDIAVIL-2	-108.85	192	60%
220KV_KJHAR_GR -KEONJ_PG - 1	-11.58		

220KV_KJHAR_GR-KEONJ_PG - 2	-11.75		
LAXMIPUR_POWER TRANSFORMER	2.97	20	16%
PARAD AUTO2	-74.20	160	49%
PARAD AUTO3	-67.87	160	45%
TARKE AUTO1	50.91	100	54%
TARKE AUTO2	52.13	100	55%
TARKE AUTO3	51.04	100	54%
TARKE AUTO4	0.00	100	0%
THERU AUTO1	-22.22	100	23%
THERU AUTO2	21.45	100	23%
TTPS AUTO1	411.78		
TTPS AUTO2	0.00		
BOLNW_BOLAN_PG-2	-127.65	192	70%
132 KV ANAND_BAITARANI PWR	-0.03		
220 KV_NAREN_TATA GOPALPUR FDR-1	0.00	192	0%
220 KV_NAREN_TATA GOPALPUR FDR-1	3.32	192	2%
220 KV_JAYAN_JEYPO FDR-3	-20.90	192	11%
220 KV_JAYAN_JEYPO FDR-4	-23.87	192	13%
KESINGA - BOLANGIR PG	-60.98	192	33%
PRATAPSASAN-PANDIAVIL - 1	-111.61	192	61%
PRATAPSASAN-PANDIAVIL - 2	-111.83	192	61%
220 BUDHIPADAR - SMC 1	-13.22	192	7%
132 LAPAN - SMC	21.64	76	30%
132KV JODA-KENDUPOSI	22.42	76	31%

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur  
Bhubaneswar-751021

Case No: 93/2024

Filing No: 1

IN THE MATTER OF:

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022.

... Applicant

AND

IN THE MATTER OF:

M/s. Jindal Stainless Limited, Kalinga Nagar, Industrial Complex, Jajpur, Odisha: 755026

...Respondent

The humble respondent above named most respectfully submit as under:

1. That the objector i.e. M/s. Jindal Stainless Limited (hereinafter referred as "JSL" / "Respondent") is a company incorporated under the provisions of the Companies Act, 1956, having its Registered Office at O.P. Jindal Marg, Hisar- 125005, Haryana and plant site at Kalinga Nagar Industrial Complex, At/Po- Danagadi, PIN-755026, Dist- Jajpur, Odisha.

JSL is submitting the following points on the application of OPTCL for determination of Annual Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 for kind review and necessary action by the Hon'ble Commission.

**Determination of Transmission Charges**

OPTCL has given the proposal for transmission charges @ 36.08 P/U for FY 2025-26 against 24 P/Unit as approved by the Commission during FY 2024-25. The proposed Transmission Tariff of 36.08 P/U is very high and should not be permitted. This will



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Rajendra R. PANIGRAHI  
A.G.M (LEGAL)  
JINDAL STAINLESS LIMITED  
Kalinga Nagar Industrial Complex  
Danagadi, Jajpur-755026

adversely affect the RST of the DISCOMS and will be a huge burden on the consumers of Odisha. Hence, it is proposed that the same be reviewed and reduced substantially.

**4. Transmission Loss:**

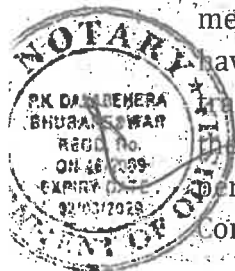
OPTCL has proposed transmission loss at 3.05%. In conformity with the power sector reform, OPTCL needs to reduce the transmission loss significantly. We propose to approve transmission loss of OPTCL at 2.5%.

However, in the neighbouring states such as Andhra Pradesh, where almost similar type of network configuration is available, the Electricity Regulatory Commission has considered the lower limit of intra-state transmission loss for the FY 2023-24 at the level of 2.80%. Further, the transmission losses approved by the respective Electricity Regulatory Commissions for other neighbouring states like West Bengal, Madhya Pradesh, Bihar, and Chhattisgarh with similar types of infrastructure are in the range of 2.23% to 3%.

In page 229, OERC Form T-6, OPTCL has considered gross input at 22625.18 MU and gross output 21925.96 MU for the period April 2024 to September 2024. Thus, the total loss for 6 months is 699.23 MU. However, it may be noted that a CGP of capacity 250 MW inject around 25 MU in a financial year to OPTCL grid as inadvertent injection. Now, considering operating capacity of CGP in Odisha at 9850 MW, the estimated inadvertent injection to OPTCL grid will be around 985 MU. Hence, in a period of six months the average inadvertent injection will be 492.5 MU. Thus, the reported transmission loss of OPTCL of 699.23 MU in six months is incorrect and is based on without any third party audit. If we account for the CGP inadvertent injection, then the loss will be around  $699.23 \text{ MU} - 492.5 \text{ MU} = 206.73 \text{ MU}$ . Thus, the OPTCL transmission loss will be around 0.91%. In view of the above submission, it is prayed before the Hon'ble Commission to consider the above and accordingly re-calculate and approve transmission loss.

5. That OPTCL have not yet identified the areas where loss is maximum and OPTCL need to formulate action plans for loss reduction. OPTCL should inform the methodology adopted to estimate the transmission loss for every year. OPTCL should have undertaken energy audits of lines and substations to know the quantum of transmission loss in the system. There is enough measure by which OPTCL could reduce the Transmission loss. OPTCL should conduct energy audits and their standard performance should be monitored by a third party auditor appointed by the Commission so as to assess the actual performance of the licensees.

6. That earlier CGPs used to inject inadvertent power to the grid and GRIDCO availed the benefits of inadvertent power. GRIDCO also used to pay the hydro pool cost towards the inadvertent power. However, from FY 2019-20 onwards GRIDCO has stopped making payment towards inadvertent injections. Hence, OPTCL become the



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*Rajendra*  
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A.G.M (LEGAL)  
JINDAL STAINLESS LIMITED  
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Danagadi, Jajpur-755026

ultimate beneficiary of such injection of inadvertent power. We pray to Hon'ble Commission to direct OPTCL to submit the detail list of inadvertent injection for each month by each CGP and consider the same as an additional injection to the grid accordingly calculate the transmission loss. The data of inadvertent injection is available with OPTCL and SLDC for each month for each CGP who are connected to EHT transmission system of OPTCL. The entire stakeholder and consumers of Odisha will be benefitted by such methodology as the intra-state transmission loss will reduce significantly.

### 7. Open Access Charges:

In order to have an insights on the loading of existing transmission systems corresponding to the system peak demand of 6927.78 MW as touched in the month of June 2024. Each year Hon'ble OERC informed OPTCL to submit 400 kV, 220 kV, 132 kV Power Transformer and EHT lines loading. OPTCL should make a practice to submit the Power flow data for 400 kV, 220 kV line and 132 kV line and its loading and the entire Auto-transformer loading, Power Transformer and ICT loading along with the ARR application. Moreover by only submitting only power transmitted on the peak demand day will not solve the purpose. In order to ascertain the margin availability, OPTCL may be directed to submit the maximum power handling capability, power flow and % loading of all the 400 kV, 220 kV, 132 kV line and Power Transformer, Auto Transformer, ICT Transformers. It is also desired that OPTCL should conduct load flow analysis to handle around 2000-3000 MW differential load in appropriate manner.

Once these data are made available, it can be ascertained that, there are sufficient margin is available in the transmission network and in order to utilize it fully, STOA should be promoted and the charges for the same may be kept at 1/4 of the MTOA and LTOA charges and necessary amendments in the regulations may be made.

### 8. Introduction of Reactive Energy Charges:

OPTCL has proposed to introduce Reactive Energy Charges of 3 Paise / KVARh which is very high and should be reduced in consultation with various stakeholders.

#### Levy of Grid Support Charge for connectivity:

OPTCL has submitted an application to the Hon'ble OERC on 26.06.2024, to determine and approve the imposition of Grid Support Charges for industries with Captive Generating/Cogeneration plants that operate alongside the OPTCL grids.

The case was registered as OERC Case No.-44/2024. In an order dated July 6, 2023, the High Court suggested that if OPTCL wishes to pursue the imposition of Grid Support Charges, they should file a separate application with the OERC. The court emphasized that the OERC, under Section 181 of the Electricity Act, should examine the justifiability



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Rajendra

R. P. PANIGRAHI  
A.G. LEGAL  
INDRA SAINLESS LIMITED  
Kalinga Nagar Industrial Complex  
Panagadi, Jainpur-755020

of such charges. Hon'ble Commission in order dated 09.07.2024 in case no 44 of 2024 has directed OPTCL to submit a consolidated report considering certain queries. Therefore, the proposal of OPTCL to levy of Grid Support Charge for FY 2025-26 for connectivity may be rejected.

10. The Commission may direct OPTCL to continuously monitor the operation of transmission system, prevent over loading/under loading wherever possible by taking suitable measures and take up innovative action for optimum loading of the existing network for further reduction of loss.

11. Further, some of the substations and lines are either overloaded due to technical constraints or operating in under loaded condition because of absence of downstream infrastructure of DISCOMs. The Commission should direct OPTCL to take action for a co-ordinated development of intra-state network, ISTS and downstream distribution network. The time frame of execution of transmission system and substations should be discussed with DISCOMs & CTU in order for effective power evacuation and to avoid stranded assets and idle investments.

12. The Commission should direct that transmission system strengthening proposals should also be executed as per the timeline requirements of CD enhancement application of industries and sourcing of open access power.

13. OPTCL should be directed to consider the meter data to assess the month-wise transmission loss in intra-state transmission system including losses at different voltage levels (i.e. 132 kV, 220 kV and 400 kV levels).

14. The Hon'ble commission may consider our views and accordingly pass appropriate orders.



**PRAYER**

In the facts and circumstances stated above and in the interest of the parties and the interest of the State the Hon'ble Commission be pleased to pass appropriate orders to the effect that

1. ARR of OPTCL may be approved accordingly based on the submission made above.
2. The Transmission Charges should be reviewed and reduced substantially.
3. Transmission loss to be reduced considering the submission made for FY 2025-26.
4. Proposal of Reactive energy charges of 3 paise/KVARh should be reduced.
5. Proposal of OPTCL to levy of Grid Support Charge for connectivity may be rejected.

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Rayendra Prasad R.P. PANIGRAHI  
A.G.M (LEGAL)  
JINDAL STAINLESS LIMITED  
Kalinga Nagar Industrial Complex  
Banaqadi Jaipur 305001

6. Each year truing up exercise and business plan approval should be carried out by Hon'ble commission through a process of public hearing.

Place: Bhubaneswar

For M/s. Jindal Stainless Ltd.

Date: 15.01.2025

*Rajinder Prasad Panigrahi*  
Authorized Signatory

**R. P. PANIGRAHI**  
A.G.M (LEGAL)  
JINDAL STAINLESS LIMITED  
Kalinga Nagar Industrial Complex  
Danagadi, Jajpur-755026



**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur  
Bhubaneswar-751021**

**Case No: 93/2024  
Filing No: 1**

**IN THE MATTER OF:**

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**AND**

**IN THE MATTER OF:**

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022.

**... Applicant**

**AND**

**IN THE MATTER OF:**

M/s. Jindal Stainless Limited, Kalinga Nagar, Industrial Complex, Jajpur, Odisha: 755026

**...Respondent**

**Affidavit verifying the application**

I, Mr. Rajendra Prasad Panigrahi, Son of Late Anirudha Panigrahi aged about 51 years, working as AGM (Legal) of M/s. Jindal Stainless Limited having its plant site office at Kalinga Nagar Industrial Complex, Jakhapura-755026, Jajpur, Odisha do hereby solemnly affirm and state as follows: -

That I am the Authorised person M/s. Jindal Stainless Limited and I am duly authorized to swear this affidavit on its behalf.

The statements made herein now are based on information and I believe them to be true.

**THE ABOVE NAMED DEPONENT BEING**

**IDENTIFIED BY P. K. Dalabhera**

**ADV. BBSR APPEARS BEFORE ME AND**

**STATE AN OATH 15.01.2025 AT ABOUT 11:30 AM**

**.....AD/PM THAT THE CONTENTS**

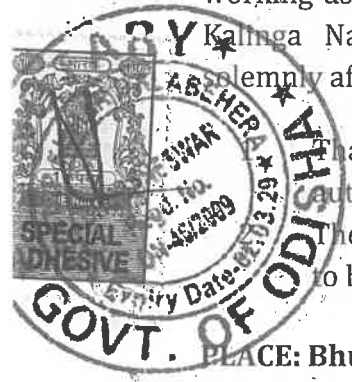
**OF THIS AFFIDAVIT ARE TRUE TO THE**

**BEST OF HIS/HER KNOWLEDGE**

**DEPONENT PANIGRAHI  
A.G.M (LEGAL)  
JINDAL STAINLESS LIMITED  
Kalinga Nagar Industrial Complex  
Danagadi, Jajpur-755026**

**P. K. DALABHERA  
Notary, Bhubaneswar  
Regd. No. ON-46/09**

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**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur  
Bhubaneswar-751021**

**Case No: 93/2024**

**Filing No: 1**

**IN THE MATTER OF:**

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**AND**

**IN THE MATTER OF:**

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022

**... Applicant**

**AND**

M/s. Jindal Stainless Limited, Kalinga Nagar, Industrial Complex, Jajpur, Odisha: 755026

**...Respondent**

**Letter of Authorization**

I, Mr. Rajendra Prasad Panigrahi, Son of Late Anirudha Panigrahi aged about 51 years, working as AGM (Legal) of M/s. Jindal Stainless Limited hereby authorize Sri Bibhu Swain, residing at K-8-82, Kalinga Nagar, Ghatikia, Bhubaneswar-751029 to be my representative to present the above case on my behalf before the Hon'ble Odisha Electricity Regulatory Commission relating to my above reply and to submit any additional submission, memos, documents etc. as may be required and in general do all such thing as may be required in connection with the above reply.

**For M/s. Jindal Stainless Limited**

**Place: Bhubaneswar**

**Date: 15.01.2025**

*Rajendra Prasad Panigrahi*  
**Authorized Signatory**



**R. P. PANIGRAHI**  
A.G.M (LEGAL)  
JINDAL STAINLESS LIMITED  
Kalinga Nagar Industrial Complex  
Danagadi, Jajpur-755026

**R. P. PANIGRAHI**  
A.G.M (LEGAL)  
JINDAL STAINLESS LIMITED  
Kalinga Nagar Industrial Complex  
Danagadi, Jajpur-755026

**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
PLOT NO. 4, CHUNAKOLI, SAILESHREE VIHAR,  
CHANDRASEKHARPUR, BHUBANESWAR-751021**

**CASE NO. 93/2024  
FILING NO. 3**

**IN THE MATTER OF:** (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**And**

(ii) Truing up application for the FY 2023-24 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

**AND**

**IN THE MATTER OF:** Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

**..... Applicant**

**vrs**

**M/s. Jindal Stainless Limited**, Kalinga Nagar, Industrial Complex, Jajpur, Odisha: 755026 and **15 others**.

**..... Objectors**

**Rejoinder to the objections raised by the Objector M/s.  
Jindal Stainless Limited.**

**The humble applicant above named**

**MOST RESPECTFULLY SHEWETH:**

1. That the Objector M/s. Jindal Stainless Limited vide affidavit dated 15.01.2025 has raised certain submissions on ARR & Transmission Tariff Application of OPTCL for FY



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*Pooja Kumar Mallick*

2025-26 and Truing up application for the FY 2023-24. In reply, OPTCL submits its rejoinder to the submissions in the following paragraphs.

**Rejoinder to Para 3:**

**Determination of Transmission Charges:**

The Transmission infrastructures are created considering the demand and request of the DISCOMs from time to time, after due approval from the Hon'ble OERC through Transmission Plan. Being a Transmission License, OPTCL has always endeavored to create the Transmission infrastructure for providing reliable and quality power to the consumers of DISCOMs. Accordingly, every year OPTCL is adding more transmission assets to meet the requirement of DISCOMs. Transmission Charge is arrived at 36.08 paise per unit by dividing the total ARR of OPTCL with the recent realistic MU projections of DISCOMs and recovered from them on a monthly basis. This rate will decrease if DISCOMs drawal increase. Alternatively, OPTCL is proposing to recover the Transmission charges on a monthly basis, based on the recent realistic MU projections of DISCOMs, **irrespective of the drawal.**

The proposed Transmission Charge of 36.08 p/u has been derived by considering the recent realistic energy demand projections of 38764.29 MU as communicated by the DISCOMs & other LTOA customers and the ARR figures have been arrived by OPTCL justifying component wise projections as per the provisions contained in OERC Transmission Tariff Regulations, 2014, OPTCL's Audited Accounts for FY 2023-24, all relevant data/information and materials. The details of projections are submitted in page 51-52 of the present ARR application of OPTCL for FY 2025-26. Moreover, OPTCL had furnished all requisite information and details as per the prescribed formats of the Hon'ble Commission with full justifications.

Hence, mere apprehension of the respondent towards imposition of excessive burden on Discoms seems to be inappropriate and unacceptable which is likely to be rejected at this juncture. Moreover, the contention of the stake holder operating in the value chain of electricity needs to appreciate the fact that the cost recovery has to be in full so as to make the sector sustainable.

Hence, OPTCL does not agree with the views of the Objector.

**Rejoinder to Para 4 to 6:**

**Transmission Loss**

First of all, the proposal to approve transmission loss of OPTCL at 2.5% is baseless and without any study.



The actual transmission loss for the period **Apr' - Sep' 2024** is calculated to be **3.09%** as shown in the ARR & TT application for FY 2025-26 (page-229). This figure is **less than the actual** transmission loss during last year i.e. **3.11%** for. **FY 2023-24**. In fact, OPTCL had projected Transmission loss of 3.05% for FY 2024-25, but Hon'ble Commission had set a target of 3.00% which could not be achieved yet.

In OPTCL system, the transmission loss is purely technical loss and a function of real time injection of power by a number of generators, system configuration and power flow requirements at different load centers. It depends on many parameters / factors such as distance and mismatch between generation and load centers, types of load, reactive power compensation, voltage profile, seasonal variation of demand load etc. Thus, OPTCL does not have much control over the same at any point of time. The transmission system of OPTCL operates as an integral part of the Eastern Region Grid to serve the internal demand of the State as well as to carry out import and export of power depending upon the system demand.

As of the matter of fact, some grid s/s and lines are being constructed in many remote and deprived areas funded under Central & State Govt. schemes in the interest of public. Additional length in EHT lines and Sub-stations in under-loaded areas are also responsible for increase in transmission loss.

The Transmission Loss in OPTCL network is in a gradually reducing trend over the years i.e. from 3.73% during 2014-15 to 3.11% in 2023-24 and has remained 3.09% within 1<sup>st</sup> six months of FY 2024-25 mainly due to addition of infrastructure and various system strengthening works taken up by OPTCL. The actual losses incurred over the years by OPTCL have been within the margin allowed by Hon'ble Commission up to the year FY 2017-18. However in FY 2018-19, the commission set the loss at 3.00% though the projected transmission loss was at 3.25% and thereafter the commission has been pegging the transmission loss at the same level though loss projected by OPTCL remained in a downward trend.

Year	Tr. Loss proposed	OERC Approval	Actual
2014-15	3.75%	3.75%	3.73%
2015-16	3.75%	3.75%	3.67%
2016-17	3.70%	3.70%	3.58%
2017-18	3.50%	3.50%	3.34%
2018-19	3.25%	3.00%	3.28%
2019-20	3.25%	3.00%	3.25%
2020-21	3.20 %	3.00%	3.22%
2021-22	3.15%	3.00%	3.18%
2022-23	3.10%	3.00%	3.15%



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2023-24	3.10%	3.00%	3.11%
2024-25	3.05%	3.00%	3.09% (1 <sup>st</sup> six months )

From the table given above, it is also clear that each year upto FY 2017-18, the transmission loss achieved by OPTCL has remained at a level lower than the approved figures by Hon'ble commission and from FY 2018-19 the target set by OERC appears to be very stiff which was hard to achieve though **the trend of lesser transmission loss year after year has been achieved.**

That the transmission losses depend upon the voltage level at which the power is transmitted. The transmission losses are higher where the percentage of lower voltage (132kV or below) transmission system is higher. A comparison of the average transmission losses of a few state transmission licensees and their corresponding transmission assets at low voltage level (132 kV) is shown below.

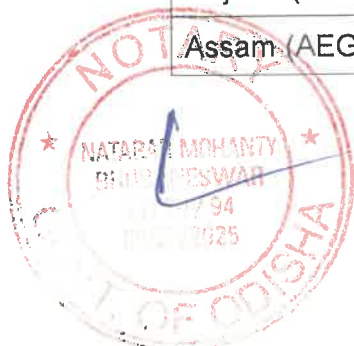
**TRANSMISSION LOSS (%) OF OTHER STATES OF LOW VOLTAGE LINES  
UPTO 132KV FOR FY 2023-24**

States	% of Low voltage Lines (up to 132 kV)			Actual Transmission Losses for FY 2023-24 (%)
	Transmission Lines up to 132kV (Ckm)	Total Transmission Lines (Ckm)	% of Transmission Lines up to 132kV	
Odisha (OPTCL)	8479.831	16508.068	51.36%	3.11
Uttar Pradesh (UPPTCL)	28733	60145	47.77%	3.22
Gujarat (GETCO)	44512	73054	60.93%	3.83

It may be kindly be appreciated that the transmission loss (technical) is bound to happen as per law of physics and is very difficult to reduce after a certain level. Also, at all India level, the transmission loss of utilities have remained at more than 3.00% and to suffice our view point the table is given below for kind appreciation of Hon'ble Commission.

**Transmission loss of Different states for FY 2023-24**

Name of states	Tr. loss approved by State Commission	Actual Tr. loss
Uttar Pradesh (UPPTCL)	3.22%(UERC)	3.22%
Gujarat (GETCO)	3.60% (GERC)	3.83%
Assam (AEGCL)	3.30%(AERC)	3.30%



Rajasthan (RVPN)	4.50%(RERC)	4.23%
Himachal Pradesh (HPPTCL)	3.19% (HERC)	3.25%

All India average transmission loss for the period 06-01-2025 to 12-01-2025 as published by Grid Controller Of India Limited, National Load Despatch Centre dated 18.01.2025 is 4.00 %. Further, as per the CEA General Review 2024 (Containing Data for the Year 2022-23) the transmission loss of Eastern Region is 3.37% (attached as **Annexure-01**). Present transmission loss level of OPTCL is much less than both the said cases (i.e. Grid Controller Of India Limited & CEA General Review 2024).

However, as a responsible Transmission utility, OPTCL is making an all-out effort to reduce the transmission loss further by undertaking various **system operation and loss reduction measures** by implementing the emerging technologies like **system Automation**, load bifurcation, **modification in system configuration**, procurement of more efficient equipment, **Digitalization of grids** by using SAS, Protection system improvement using Busbar protection and Event Logger, **Conversion of Radial to Ring system**, Advanced Metering Infrastructure etc. to bring it to **3.05% by FY 2025-26**.

#### Regarding inadvertent power

OPTCL does not agree to the assumption of the respondent that around 985MU of inadvertent power will be injected in OPTCL system in a year considering the CGP capacity 9850MW. In this regard it is submitted that during the last six months, it is observed that total inadvertent power injection is 239.38MU which has been already considered while calculating the Transmission loss of 3.09% in form T-6. Hence, Transmission loss as suggested by the Objector is not just and proper. Details of inadvertent power injected by CGPs in FY 2024-25 till November is attached as **Annexure-02**.

Further, it is submitted that Transmission charge is being computed on Open access transactions based on scheduled energy. Hence, OPTCL does not reap any benefit out of inadvertent power.

#### Steps taken for Energy Audit

Around 2600 nos. of 0.2s Accuracy Class ABT Energy meters are required for different metering points at all Grid Substations of OPTCL for billing and audit purposes. 538 nos. of meters have been installed by OPTCL at different metering points. 2000 nos. energy meters will be installed at different Grid Substations under SAMAST Project, out of which 70 nos. meters have been installed and the installation process of balance meters are in progress. The installation of energy meters for balance metering



points under **SAMAST** Project will be completed by 31st October 2025. After installation of the meters, energy audit and calculation of transmission losses of OPTCL on an element-wise at different voltage levels will be feasible.

**Rejoinder to Para 7:**

**Open Access Charges:**

That the system peak demand of 6927.78 was touched on dated.19.10.2024. Statement on the loading pattern of the existing transmission system (400kV, 220kV, 132kV power transformers and EHT lines) corresponding to the peak demands is attached as **Annexure-03**. OPTCL has already conducted load flow study considering different load scenario i.e Summer peak, Winter lean, High hydro, Low Hydro & Solar Peak, in the Revised 14th Intra-state Transmission Plan of Odisha for FY 2022-23 to FY 2026-27, which has been approved by Hon'ble Commission vide case no. 08/2024. In the aforesaid report percentage loading of all Transmission line, ICT, Auto & Power Transformers till FY 2026-27 have been mentioned. The Transmission infrastructures are created considering the demand and request of the DISCOMs from time to time, after due approval form the Hon'ble OERC through Transmission Plan and the DISCOMs and other LTOA customers are responsible to bear the full approved ARR of OPTCL. STOA charges is being charged as per the Open Access Regulations, 2020.

**Rejoinder to Para 8:**

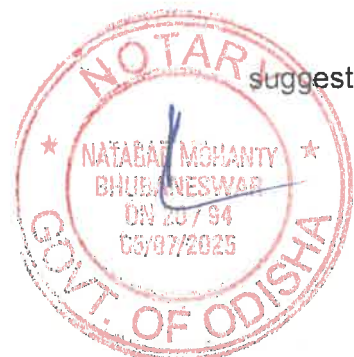
**Reactive Energy Charges:**

As per Regulation 31(1) under Chapter-7 (IMBALANCE AND REACTIVE ENERGY CHARGES) of the OERC (Terms and Conditions of Intra-State Open Access) Regulations, 2020, payment for the reactive energy charges by open access consumers shall be in accordance with provisions stipulated in the State Grid Code or as may be specified in relevant regulations/orders of the Hon'ble Commission .

The Hon'ble Commission in Para 16 (page 5) of the order dated 05.02.2019 in Case No. 50/2017 has inter alia viewed that the provisional reactive energy charges of 3 paise/KVARh as allowed in the ARR order of OPTCL for FY 2018-19 continue for time being till a final justification is submitted by OPTCL in consultation with the stakeholders. However, OPTCL **has not realized any revenue** from Reactive Energy Charges so far.

In view of the above, OPTCL proposes that 3paise/KVARh may be approved provisionally as Reactive Energy Charges for FY 2025-26.

Hence, the proposal of objector to reduce the reactive energy charges as suggested by OPTCL is not just and proper.



**Rejoinder to Para 9:**

**Levy of Grid Support Charge for connectivity:**

The benefits derived by the CGPs with co-located loads are enormous. The benefits are in the nature of ancillary services which are not paid till now. The Grid support charges (GSC)/Parallel operation charge has been levied by different state Regulatory Commissions and upheld by APTEL and Supreme Court of India through various orders and hence proposed by OPTCL through a separate petition. Recently, OPTCL had filed an application (case No. 44 of 2024) on 26.06.2024 for determination and approval for levy of Grid Support Charges for industries having Captive Generating / Cogeneration plants and running in parallel with the Grids of OPTCL. Hon'ble Commission in its order directed OPTCL to submit a consolidated report considering the observations/queries raised by the stakeholders in the earlier Cases filed by OPTCL. In compliance to above, OPTCL is in final stage of preparation of the required consolidated report and will be submitted before Hon'ble Commission shortly.

**Rejoinder to Para 10 & 11:**

To prevent overloading, regular system study has been carried out and augmented the network capacity as when required. Priority has been given to use of under loaded network. As directed by Commission regular meeting has been conducted with DISCOMs for creation of downstream infrastructure for optimum utilization transmission networks.

2. The objections not specifically admitted may be deemed to have been denied.

**PRAYER**

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of M/s. Jindal Stainless Limited while approving ARR and Transmission Tariff of OPTCL for FY 2025-26 & Truing up application for the FY 2023-24.

Bhubaneswar  
January 31, 2025

By the Applicant  
Through

*Pooja Kumar Mallik*

Sr. GM (EI.), RT&C





**Table 6.2**  
**Regional Transmission Losses**  
**Utilities**  
**2022-23**

Region	Energy Available In the Region (GWh)	Export to other Region (GWh)	Export to Nepal (GWh)	Export to Bangladesh (GWh)	Export to Bhutan (GWh)	Export to Myanmar (GWh)	Total Energy drawal by States/Utilities (GWh)	Transmission Losses (GWh)	Transmission Losses (%)
1	2	3	4	5	6	7	8	9 (2-3-4-5-6-7)	10((8/2)x100)
Northern Region	235784.74	3399.70	343.64	0.00	0.00	0.00	224171.69	7869.71	3.34
Western Region	282367.53	57344.05	0.00	741.34	0.00	0.00	215219.30	9062.84	3.21
Southern Region	173393.55	7625.46	0.00	3491.13	0.00	0.00	156314.82	5962.13	3.44
Eastern Region	134352.68	57191.16	314.03	7547.70	266.30	0.00	64506.41	4527.08	3.37
North Eastern Region	21117.54	4662.00	0.00	1039.50	38.47	9.81	14499.49	868.27	4.11

SL. No.	CGP Stations	STATEMENT OF FREE POWER OF CGPS FOR FY 2024-25												TOTAL Injected (In Kwh)
		APRIL'24 Injected (In Kwh)	MAY'24 Injected (In Kwh)	JUN'24 Injected (In Kwh)	JULY'24 Injected (In Kwh)	AUG'24 Injected (In Kwh)	SEPT'24 Injected (In Kwh)	OCT'24 Injected (In Kwh)	NOV'24 Injected (In Kwh)					
1	IMFA	9,64,093	8,71,590	9,66,013	6,90,482	6,60,805	8,44,052	11,81,938	8,61,089	70,40,062				
2	NALCO	10,68,227	11,48,265	82,715	3,79,525	1,19,400	2,91,407	7,95,571	3,54,861	42,39,971				
3	ARATI STEELS	8,62,606	9,17,113	7,95,889	8,37,134	9,54,267	7,77,542	12,32,834	4,38,520	68,15,905				
4	Anyan Ispat Ltd.	1,89,004	75,496	94,374	1,28,766	75,923	1,18,270	1,13,984	93,094	8,88,911				
5	BPSL	55,93,922	73,91,485	59,86,547	47,02,977	55,65,774	84,85,797	73,22,641	56,03,633	5,06,52,776				
6	TATA BSL (BSL)	1,04,87,992	80,79,802	1,02,02,963	1,00,97,489	59,31,643	69,64,899	1,07,69,509	78,60,310	7,03,94,607				
7	DINABANDHU	-	-	28,262	5,86,618	14,65,620	15,47,850	14,27,620	15,00,550	1,12,94,300				
8	HINDALCO	12,76,300	13,30,670	13,48,750	1,990	31,380	55,630	4,700	140	95,260				
9	IFFCO	730	210	480	8,91,100	7,64,870	7,70,640	9,64,040	11,83,350	79,47,690				
10	JSL	10,68,260	10,39,500	12,65,930	54,03,917	9,81,356	23,35,330	40,58,051	83,47,885	3,11,17,598				
11	JSPL	37,70,844	28,08,670	34,11,545	2,60,512	3,73,954	8,90,365	2,25,416	1,78,372	23,49,311				
12	BPPL	1,30,416	1,35,928	1,54,348	6,83,208	10,57,109	9,66,770	10,59,627	7,65,805	72,90,158				
14	MAITHAN	14,48,004	9,09,222	4,00,413	-	56,914	2,25,360	1,47,510	2,39,699	10,32,580				
15	NARBHERAM	2,01,659	58,238	1,03,200	96,865	5,696	95,165	11,240	3,849	2,44,197				
16	NINL	5,028	31	26,323	2,52,226	2,21,855	2,06,940	3,12,429	2,19,178	17,76,571				
17	MGM	1,82,571	1,45,479	2,35,893	5,53,073	1,72,331	5,59,808	4,39,361	5,28,169	43,25,010				
18	NAVA LTD.	4,20,921	4,75,773	6,19,574	3,14,046	7,28,849	3,16,147	2,67,925	2,33,407	22,73,288				
21	DALMIA CEMENT (OCL)	2,99,204	3,75,083	2,94,627	80,334	1,19,485	1,63,380	86,986	65,883	7,13,734				
22	Debtor (Dalmia Kapilas)	66,891	69,910	60,865	-	14	-	460	5	483				
23	PATNAIK STEEL	2	1	1	8,04,091	1,12,952	4,43,299	5,56,802	3,34,735	29,52,200				
24	RSP	3,45,754	1,88,727	1,65,840	1,66,416	1,11,304	1,39,010	1,22,197	1,67,099	9,41,332				
25	MSP METALICS	1,59,426	-	75,880	1,94,760	1,21,420	1,68,600	38,210	1,57,180	11,73,550				
26	SHYAM METALICS	1,38,910	2,80,040	74,430	2,05,081	3,30,178	4,44,025	2,84,981	3,81,790	22,82,785				
27	TATA SPONGE	2,29,645	2,60,280	1,46,805	2,42,700	2,30,926	4,54,063	5,40,147	3,10,124	26,14,616				
28	VAL JHARSUGUDA	2,30,917	3,43,139	2,62,600	7,13,440	6,33,460	7,86,250	8,79,780	6,37,430	49,49,410				
29	VAL LANJGARH	2,75,100	4,13,880	6,10,070	9,47,300	30,61,941	12,17,292	14,18,462	12,09,048	96,30,267				
30	VISA	7,71,061	10,05,163	9,47,300	2,69,420	5,23,439	3,70,361	5,48,210	3,71,584	36,47,711				
31	OSISL	7,65,935	4,69,738	3,29,024	3,41,391	4,46,352	4,17,582	4,09,942	10,46,114	31,71,166				
34	SHREE GANESH	1,00,210	1,55,053	2,54,522	8,52,098	6,34,255	7,53,202	8,37,072	7,47,334	53,82,035				
35	FACOR	2,65,677	5,50,814	7,41,583	7,56,250	8,02,740	7,21,920	8,59,310	7,69,820	62,39,820				
36	ADITYA (LAPANGA)	6,78,480	8,25,910	8,25,390	1,11,325	65,628	29,951	55,182	58,708	5,15,311				
37	Arcelor Mittal Nippon Steel	4,772	90,245	99,500	2,75,829	1,95,433	2,49,838	2,25,838	1,87,062	18,75,699				
38	BEL	2,10,320	2,69,476	2,62,673	11,05,979	7,99,391	62,967	5,69,458	5,82,286	54,92,049				
40	Viraj steel	6,27,076	8,81,557	8,63,335	33,01,927	26,70,196	33,64,501	33,82,666	27,08,923	2,50,35,755				
41	RUNGTA MINES DSP	30,64,885	34,10,700	31,31,957	3,86,202	2,21,501	4,01,154	3,09,846	4,97,457	36,01,393				
42	Runga mines (Kamanda steel ltd.)	5,57,936	6,40,070	5,87,227	16,842	2,98,357	3,89,125	44,787	18,658	21,08,118				
43	Runga mines (Kamanda steel ltd.)	12,15,441	1,23,304	1,604	5,29,910	4,25,823	4,82,690	6,53,975	2,05,400	37,79,250				
44	SMC JHARSUGUDA	4,28,253	5,30,964	5,22,235	4,79,752	4,68,993	4,71,241	4,18,625	1,30,510	28,63,432				
45	SMC BADMAL	2,11,681	1,87,531	4,95,099	4,79,752	4,68,993	4,71,241	4,18,625	1,30,510	28,63,432				
46	ABREL	35,599	53,714	33,667	42,270	38,116	38,364	35,739	27,841	3,05,310				
47	KJS ALUWALIA	2,42,458	26,81,937	8,05,113	10,75,172	3,71,659	6,54,355	11,680	58,42,374					

48	SHREE CEMENT	43,307	77,658	1,48,698	1,72,642	2,11,054	2,05,650	1,46,729	93,075	10,98,813
49	JAGANNATH POWER	4,31,538	6,59,109	7,10,884	8,96,731	9,60,536	4,04,745	6,09,344	7,82,263	54,54,150
50	ABREL KHA-JURIAKATA	7,74,171	55,849	45,539	74,081	72,652	56,116	50,496	44,857	11,73,761
51	THAKUR PRASAD					7,00,673	1	5	1	7,00,680
53	ADHUNIK METALICS								5,93,528	5,93,528
54	OCL								5,70,453	5,70,453
	TOTAL CGP	3,98,45,226	3,73,05,387	4,00,96,511	4,01,69,132	3,54,10,340	3,84,69,467	4,44,70,009	4,15,39,394	31,73,05,466
	TOTAL (MU)	39.85	37.31	40.10	40.17	35.41	38.47	44.47	41.54	317.31

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Loading pattern corresponding to the peak demand of 6928 MW (including Vedanta drawl) on 19-JUNE-2024 AT 16:00 hrs			
FEEDER NAME	MW	Rated Capacity in MW	% Loading
400KV MENDHASAL - PANDIAVAL2	50.43		
400KV MERAMUNDALI-BOL_PG	0.00		
400KV MERAMUNDALI-KANIHA1	-637.76		
400KV MERAMUNDALI-KANIHA2	-385.39		
400KV INDRAVATI ICT1	-67.47		
400KV INDRAVATI ICT2	-66.91		
400KV MERAMUNDALI-BOL_PG	0.00		
400KV DUBNW- KALABADIA	-368.96		
400KV_OPGC-JHARS_PG - 1	230.36		
400KV_OPGC-JHARS_PG - 2	150.50		
MENDHASAL -PANDIAVIL 1	49.34		
DUBNW- PANDIAVAL	75.67		
VEDANTA-JHARSUGUDA1 PG	-40.51		
VEDANTA-JHARSUGUDA2 PG	-40.23		
220KV JODA-JAMSHEDPUR	5.54	192	3%
220KV JODA-RAMCHANDRAPUR	-156.72	192	86%
KATAPALLI2-BOLAN PG	0.00	192	0%
SADEIPALLI2-BOLAN PG	-127.65	192	70%
220KV RENGALI-RENGALI PG 1	24.96	192	14%
220KV RENGALI-RENGALI PG 2	9.33	192	5%
220KV RENGALI-KANIHA	-132.61	192	73%
220KV TTPS-KANIHA	136.08	192	75%
220KV MERAMUNDALI-KANIHA 1	-107.71	192	59%
220KV MERAMUNDALI-KANIHA 2	-103.58	192	57%
220KV JAYANAGAR-JEPORE PG 1	-22.71	192	12%
220KV JAYANAGAR-JEPORE PG 2	-23.86	192	13%
220KV BUDHIPADAR-KORBA 1	-4.14	192	2%
220KV BUDHIPADAR-KORBA 2	-2.92	192	2%
220KV BUDHIPADAR-KORBA 3		192	0%
220KV TARKERA-BISRA 1	-201.68	350	61%
220KV TARKERA-BISRA 2	-205.17	350	62%
132KV KALABADIA-BANGIRIPOS	62.92	76	87%
132KV KALABADIA-BARIPADA	66.95	76	93%
220KV KALABADIA-BALASORE 1	176.81	192	97%
220KV KALABADIA-BALASORE 2	177.28	192	97%
NET - KALABADIA DRAWL	-916.91		
ATRI_AUTO-1	98.39	160	65%
ATRI_AUTO-2	98.61	160	65%
BALAS AUTO1	-77.17	160	51%
BALAS AUTO2	-76.75	160	50%
BALAS_AUTO-3	-76.34	160	50%
BHADR AUTO1	0.00	100	0%
BHADR AUTO2	91.01	160	60%
BHADR_AUTO-3	91.84	160	60%

BHANJ AUTO1	53.54	160	35%
BHANJ AUTO2	47.17	160	31%
BIDAN AUTO1	-54.85	100	58%
BIDAN AUTO2	0.00	100	0%
BIDAN AUTO3	23.75	160	16%
BOLNW AUTO1	67.28	160	44%
BOLNW AUTO2	70.89	160	47%
BOLNW_AUTO-3	66.65	160	44%
BUDHI AUTO1	92.49	160	61%
BUDHI AUTO2	52.98	160	35%
BURLA AUTO1	35.41	100	37%
BURLA AUTO2	35.34	100	37%
BURLA_AUTO-3	53.04	160	35%
CHAND AUTO1	56.32	100	59%
CHAND AUTO2	97.51	160	64%
CHAND AUTO3	60.82	100	64%
CHAND AUTO4	94.03	160	62%
DUBURI AUTO1	58.66	160	39%
DUBURI AUTO2	56.70	160	37%
DUBURI AUTO3	37.08	100	39%
GODA_AUTO-1	30.13	160	20%
GODA_AUTO-2	30.47	160	20%
JAYAN AUTO1	47.72	160	31%
JAYAN AUTO2	40.76	160	27%
JODA AUTO1	64.76	160	43%
JODA AUTO2	65.89	160	43%
JODA AUTO3	53.73	100	57%
LAPAN_AUTO-1	81.15	160	53%
LAPAN_AUTO-2	81.07	160	53%
MERAM AUTO1	39.55	100	42%
MERAM AUTO2	38.57	100	41%
MERAM AUTO3	37.43	100	39%
NAREN AUTO1	0.00	160	0%
NAREN AUTO2	0.00	160	0%
NAREN AUTO3	0.00	100	0%
PARAD AUTO1	-46.12	100	49%
NAYAG POWXFM1	22.55		
NAYAG POWXFM2	13.44		
NAYAG POWXFM3	-22.16		
TATAPOWER1	-4.60		
TATAPOWER2	-2.02		
VAL DRAWAL	-959.45		
VEDANTA IPP	499.41	600	88%
ATRI-PANDIAVIL-1	-107.98	192	59%
BHOGRAI-KUCHEI	-29.34	76	41%
JALESWAR-KUCHEI	-40.58	76	56%
ADITYA_LOAD	0.00		
INFA-THERU	37.25	76	52%
ATRI-PANDIAVIL-2	-108.85	192	60%
220KV_KJHAR_GR-KEONJ_PG-1	-11.58		

220KV_KJHAR_GR-KEONJ_PG - 2	-11.75		
LAXMIPUR_POWER TRANSFORMER	2.97	20	16%
PARAD AUTO2	-74.20	160	49%
PARAD AUTO3	-67.87	160	45%
TARKE AUTO1	50.91	100	54%
TARKE AUTO2	52.13	100	55%
TARKE AUTO3	51.04	100	54%
TARKE AUTO4	0.00	100	0%
THERU AUTO1	-22.22	100	23%
THERU AUTO2	21.45	100	23%
TTPS AUTO1	411.78		
TTPS AUTO2	0.00		
BOLNW_BOLAN_PG-2	-127.65	192	70%
132 KV ANAND_BAITARANI PWR	-0.03		
220 KV_NAREN_TATA GOPALPUR FDR-1	0.00	192	0%
220 KV_NAREN_TATA GOPALPUR FDR-1	3.32	192	2%
220 KV_JAYAN_JEYPO FDR-3	-20.90	192	11%
220 KV_JAYAN_JEYPO FDR-4	-23.87	192	13%
KESINGA - BOLANGIR PG	-60.98	192	33%
PRATAPSASAN-PANDIAVIL - 1	-111.61	192	61%
PRATAPSASAN-PANDIAVIL - 2	-111.83	192	61%
220 BUDHIPADAR - SMC 1	-13.22	192	7%
132 LAPAN - SMC	21.64	76	30%
132KV JODA-KENDUPOSI	22.42	76	31%

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BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur  
Bhubaneswar-751021

Case No: 93/2024

Filing No: 1

IN THE MATTER OF:

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022.

... Applicant

AND

IN THE MATTER OF:

The Utkal Chamber of Commerce & Industry Ltd. (UCCI), N-6, IRC Village, Nayapalli, Bhubaneswar-751015, Email: [pwrctch@gmail.com](mailto:pwrctch@gmail.com), [contactus@utkalchamber.in](mailto:contactus@utkalchamber.in), Phone-9437155337

...Respondent

**The humble respondent above named most respectfully submit as under:**

1. That, the Respondent, Utkal Chamber of Commerce & Industry Ltd. (UCCI), N-6, IRC Village, Nayapalli, Bhubaneswar - 751015 is represented by its Member Industries drawing power at EHT, HT & LT as well having Independent Power Producing Units, Captive Power Plants in the State of Odisha and the present objections are filed in general on behalf of the said member industries through Expert Committee for Power and Electricity.
2. UCCI is submitting the following points on the application of OPTCL for determination of Annual Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 for kind review and necessary action by the Hon'ble Commission.



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**3. Human Resources Expenses:**

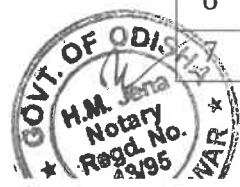
The OPTCL has projected Employee Cost expenditure at Rs. 554.05 Crore for FY 2025-26 against Rs. 488.63 Crore as approved by the Commission to be spent during FY 2024-25. The summary of Employee Expenses of OPTCL for the last fourteen financial years is furnished below.

**Summary of Employee Expenses**

Financial Year	Proposed	Approved	Actual
2010-11	865.13	279.56	173.11
2011-12	952.06	338.14	279.56
2012-13	655.36	318.48	268.59
2013-14	341.2	289.3	191.70
2014-15	361.38	318.18	309.59
2015-16	310.02	305.23	285.95
2016-17	399.56	292.55	382.44
2017-18	462.33	304.5	380.32
2018-19	419.57	360.4	375.65
2019-20	421.99	419.77	394
2020-21	466.22	415.87	373.19
2021-22	532.73	457.88	474.83
2022-23	526.53	477.19	
2023-24	508.76	449.08	
2024-25	582.06	488.63	
2025-26	554.05		

The cost break-up of the employee expense is provided below:

Sl. No	Particulars	Prev. Year 2023-24	Curr. Year 2024-25	Ensuring Year 2025-26
A	<b>Salary &amp; Allowance</b>	1	2	3
1	Basic Pay	156.70	156.69	160.16
2	Dearness Allowance	69.32	89.75	97.70
3	House Rent Allowance	23.18	25.07	25.87
4	Medical Allowances	7.51	8.71	8.41
5	Conveyance Expenses (Allowance+Reimbursement)	2.84	3.42	3.88
6	Other Allowance	1.28	1.53	1.96
	Bonus	0.01	0.01	0.01



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8	Stipend for New Recruitment	8.49	10.00	10.53
9	Stipend to Apprentice	1.64	3.00	2.74
10	Arrear Salary for Wage Board Revision	-	6.65	-
	<b>Sub-total (A)</b>	<b>270.97</b>	<b>304.83</b>	<b>311.27</b>
<b>B</b>	<b>Additional Employee Cost</b>			
1	Out Sources Engagement	3.46	5.58	6.81
	<b>Sub-total (B)</b>	<b>3.46</b>	<b>5.58</b>	<b>6.81</b>
<b>C</b>	<b>Other Employee Cost</b>			
1	Leave Travel Concession	0.09	0.63	0.63
2	Honorarium	0.09	0.12	0.12
3	Ex-gratia	7.20	5.00	8.84
4	Staff Welfare Expenses	11.07	6.75	10.81
5	Other Employee Cost	0.52	0.02	0.02
6	Capacity Building Charges	1.05	1.02	2.40
	<b>Sub-total (C)</b>	<b>20.02</b>	<b>13.54</b>	<b>22.83</b>
<b>D</b>	<b>Terminal Benefits</b>			
1	Pension	165.77	170.41	175.53
2	Gratuity	11.66	12.01	12.37
3	Leave Salary	14.79	15.16	15.62
4	Other (including contribution to NPS)	21.91	22.62	24.52
	<b>Sub-total (D)</b>	<b>214.12</b>	<b>220.20</b>	<b>228.03</b>
<b>E</b>	<b>Total Employees Cost (A+B+C+D)</b>	<b>508.57</b>	<b>544.15</b>	<b>568.95</b>
<b>F</b>	<b>Less: Employees Cost Capitalised</b>	<b>14.90</b>	<b>14.90</b>	<b>14.90</b>
<b>G</b>	<b>Net Employee Cost (E-F)</b>	<b>493.67</b>	<b>529.25</b>	<b>554.05</b>

- **Basic Pay and Grade Pay:** Basic Pay and Grade Pay proposed for FY 25-26 = Rs. 160.16 Cr. is based on actual cash flow for FY 24-25 with additional increment of 3% and average number of employee. OPTCL is planning to recruit 172 Nos. employees during FY 2024-25 and 280 Nos. in FY 2025-26.
- **DA:** OPTCL proposed 61% DA for FY 2025-26, considering Finance Dept guidelines. However, actual increase in DA may be reviewed.
- **HRA:** OPTCL proposed HRA @19%. Actual cash flow may be considered.
- **Outsourcing:** OPTCL is functioning with 50% of manpower and has outsourced services. Accordingly, Rs. 6.81 Cr. has been proposed towards payment to outsourced personnel. The same can be reviewed.
- OPTCL is planning to recruit 172 Nos. employees during FY 2024-25 and 280 Nos. in FY 2025-26 and has proposed Rs.10.53 Cr. towards stipend for the new recruiters. Considering the past trend of recruitment the same may be reviewed.



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- Actual addition of employees is lesser than the approved. Stipend and employee cost should be approved by reviewing proposed addition of employees.
- Terminal benefits should be reviewed on actual cash flow basis.

Hence the Employee cost Expenses of OPTCL for FY 2025-26 may be approved accordingly by the Hon'ble Commission.

#### 4. Repair and Maintenance (R&M) expenses

That the OPTCL has projected Repair and Maintenance Expenses at Rs. 217.7 Cr for FY 2025-26 against Rs. 135 Crs as approved by the Commission to be spent during FY 2024-25.

The summary of Repair and Maintenance (R&M) expenses of OPTCL for the last fourteen financial years is furnished below.

Summary of R & M Cost

Financial Year	Proposed	Approved
2010-11	98.14	60
2011-12	93.89	75
2012-13	95.46	95
2013-14	108.91	60
2014-15	146.77	93
2015-16	154.11	108
2016-17	170.66	110.59
2017-18	155.11	124.97
2018-19	156.19	111
2019-20	115.22	115.22
2020-21	140.59	115.22
2021-22	151.1	118.61
2022-23	148.04	110.5
2023-24	164.34	135
2024-25	169.3	135
2025-26	217.7	

#### 5. Administration & General Cost

That the OPTCL has projected Administrative and General (A&G) expenditure at Rs. 49.8 Crs for FY 2025-26 against Rs. 37.05 Crs as approved by the Commission to be spent during FY 2024-25.



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The summary of Administrative and General Expenses of OPTCL for the last fourteen financial years is furnished below.

**Summary of A&G Cost**

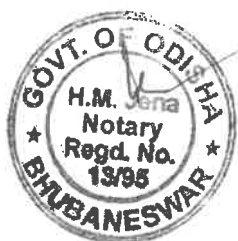
Financial Year	Proposed	Approved
2010-11	26.99	15.14
2011-12	38.34	18
2012-13	39.11	21.25
2013-14	23.09	22.39
2014-15	25.46	24.01
2015-16	32.36	24.37
2016-17	25.58	24.66
2017-18	26.11	25.6
2018-19	27.23	26.44
2019-20	28.07	27.55
2020-21	28.66	28.72
2021-22	38.13	30.35
2022-23	43.18	37.73
2023-24	47.07	40.28
2024-25	51.13	37.05
2025-26	49.8	

The Hon'ble Commission may review the Inspection fee expenses and training expenses. Details of training calendar and its benefits may be checked.

**6. Depreciation Cost**

That the OPTCL has projected depreciation expenditure at Rs. 356.57 Crs for FY 2025-26 against Rs. 275.67 Crs as approved by the Commission to be spent during FY 2024-25.

The summary of Depreciation of OPTCL for the last fourteen financial years is furnished below.



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**Summary of Depreciation Cost**

Financial Year	Proposed	Approved
2010-11	153.31	76.6
2011-12	156.4	79.42
2012-13	155.99	78.57
2013-14	172.85	89.4
2014-15	176.02	92.71
2015-16	197.72	107.48
2016-17	150.5	101.45
2017-18	192.59	130.76
2018-19	217.9	145.43
2019-20	186.03	162.06
2020-21	208.59	195.59
2021-22	276.5	232.95
2022-23	263	233.57
2023-24	293.96	269.54
2024-25	320.03	275.67
2025-26	356.57	

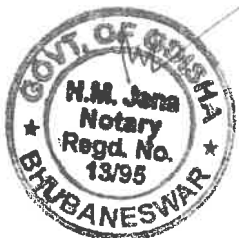
- Norms of tariff regulations and rates as specified in the Transmission Tariff regulations should be considered.
- The depreciation should be determined after due scrutiny.

**7. Annual Revenue Requirement:**

That the OPTCL has given the proposal for an annual revenue requirement of Rs. 1663.33 Crore for FY 2025-26 against Rs. 913.7 Crore as approved by the Commission to be spent during FY 2024-25.

The summary of ARR of OPTCL for the last fourteen financial years is furnished below.

Financial Year	Proposed	Approved
2011-12	1435.88	579.34
2012-13	1348.46	612.53
2013-14	874.74	597.87
2014-15	988.8	641.3



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2015-16	1008.36	630.94
2016-17	975	623.25
2017-18	1013.63	639.4
2018-19	990.65	659.95
2019-20	861.27	706.71
2020-21	966.44	713.84
2021-22	1307.17	792.93
2022-23	1247.14	831.95
2023-24	1102	896.18
2024-25	1380.69	913.7
2025-26	1663.33	

Hence the Annual Revenue Requirement of OPTCL for FY 2025-26 may be approved accordingly through a prudence check and based on the submission made above by the Respondent.

#### 8. Determination of Transmission Charges

OPTCL has given the proposal for transmission charges @ 36.08 P/U for FY 2025-26 against 24 P/Unit as approved by the Commission during FY 2024-25. The proposed Transmission Tariff of 36.08 P/U is very high and should not be permitted. This will adversely affect the RST of the DISCOMS and will be a huge burden on the consumers of Odisha. Hence, it is proposed that the same be reviewed and reduced substantially.

#### 9. Transmission Loss:

OPTCL has proposed transmission loss at 3.05%. In conformity with the power sector reform, OPTCL needs to reduce the transmission loss significantly. We propose to approve transmission loss of OPTCL at 2.5%.

However, in the neighbouring states such as Andhra Pradesh, where almost similar type of network configuration is available, the Electricity Regulatory Commission has considered the lower limit of intra-state transmission loss for the FY 2023-24 at the level of 2.80%. Further, the transmission losses approved by the respective Electricity Regulatory Commissions for other neighbouring states like West Bengal, Madhya Pradesh, Bihar, and Chhattisgarh with similar types of infrastructure are in the range of 2.23% to 3%.

In page 229, OERC Form T-6, OPTCL has considered gross input at 22625.18 MU and gross output 21925.96 MU for the period April 2024 to September 2024. Thus, the total



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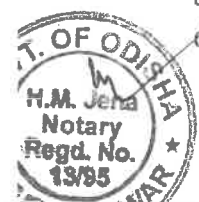
loss for 6 months is 699.23 MU. However, it may be noted that a CGP of capacity 250 MW inject around 25 MU in a financial year to OPTCL grid as inadvertent injection. Now, considering operating capacity of CGP in Odisha at 9850 MW, the estimated inadvertent injection to OPTCL grid will be around 985 MU. Hence, in a period of six months the average inadvertent injection will be 492.5 MU. Thus, the reported transmission loss of OPTCL of 699.23 MU in six months is incorrect and is based on without any third party audit. If we account for the CGP inadvertent injection, then the loss will be around  $699.23 \text{ MU} - 492.5 \text{ MU} = 206.73 \text{ MU}$ . Thus, the OPTCL transmission loss will be around 0.91%. In view of the above submission, it is prayed before the Hon'ble Commission to consider the above and accordingly re-calculate and approve transmission loss.

10. That OPTCL have not yet identified the areas where loss is maximum and OPTCL need to formulate action plans for loss reduction. OPTCL should inform the methodology adopted to estimate the transmission loss for every year. OPTCL should have undertaken energy audits of lines and substations to know the quantum of transmission loss in the system. There is enough measure by which OPTCL could reduce the Transmission loss. OPTCL should conduct energy audits and their standard performance should be monitored by a third party auditor appointed by the Commission so as to assess the actual performance of the licensees.

11. That earlier CGPs used to inject inadvertent power to the grid and GRIDCO availed the benefits of inadvertent power. GRIDCO also used to pay the hydro pool cost towards the inadvertent power. However, from FY 2019-20 onwards GRIDCO has stopped making payment towards inadvertent injections. Hence, OPTCL become the ultimate beneficiary of such injection of inadvertent power. We pray to Hon'ble Commission to direct OPTCL to submit the detail list of inadvertent injection for each month by each CGP and consider the same as an additional injection to the grid accordingly calculate the transmission loss. The data of inadvertent injection is available with OPTCL and SLDC for each month for each CGP who are connected to EHT transmission system of OPTCL. The entire stakeholder and consumers of Odisha will be benefitted by such methodology as the intra-state transmission loss will reduce significantly.

**12. Open Access Charges:**

In order to have an insights on the loading of existing transmission systems corresponding to the system peak demand of 6927.78 MW as touched in the month of June 2024. Each year Hon'ble OERC informed OPTCL to submit 400 kV, 220 kV, 132 kV Power Transformer and EHT lines loading. OPTCL should make a practice to submit the Power flow data for 400 kV, 220 kV line and 132 kV line and its loading and the entire Auto-transformer loading, Power Transformer and ICT loading along with the ARR application. Moreover by only submitting only power transmitted on the peak demand day will not solve the purpose. In order to ascertain the margin availability, OPTCL may



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be directed to submit the maximum power handling capability, power flow and % loading of all the 400 kV, 220 kV, 132 kV line and Power Transformer, Auto Transformer, ICT Transformers. It is also desired that OPTCL should conduct load flow analysis to handle around 2000-3000 MW differential load in appropriate manner.

Once these data are made available, it can be ascertained that, there are sufficient margin is available in the transmission network and in order to utilize it fully, STOA should be promoted and the charges for the same may be kept at 1/4 of the MTOA and LTOA charges and necessary amendments in the regulations may be made.

**13. Introduction of Reactive Energy Charges:**

OPTCL has proposed to introduce Reactive Energy Charges of 3 Paise / KVARh which is very high and should be reduced in consultation with various stakeholders.

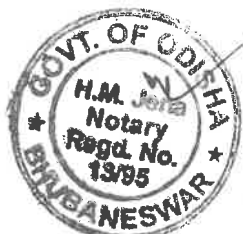
**14. Levy of Grid Support Charge for connectivity:**

OPTCL has submitted an application to the Hon'ble OERC on 26.06.2024, to determine and approve the imposition of Grid Support Charges for industries with Captive Generating/Cogeneration plants that operate alongside the OPTCL grids.

The case was registered as OERC Case No.-44/2024. In an order dated July 6, 2023, the High Court suggested that if OPTCL wishes to pursue the imposition of Grid Support Charges, they should file a separate application with the OERC. The court emphasized that the OERC, under Section 181 of the Electricity Act, should examine the justifiability of such charges. Hon'ble Commission in order dated 09.07.2024 in case no 44 of 2024 has directed OPTCL to submit a consolidated report considering certain queries. Therefore, the proposal of OPTCL to levy of Grid Support Charge for FY 2025-26 for connectivity may be rejected.

15. The Commission may direct OPTCL to continuously monitor the operation of transmission system, prevent over loading/under loading wherever possible by taking suitable measures and take up innovative action for optimum loading of the existing network for further reduction of loss.

16. Further, OPTCL has mentioned that some of the substations are operating in under loaded condition because of absence of downstream infrastructure of DISCOMs. The Commission directs OPTCL to take action for a co-ordinated development of intra-state network, ISTS and downstream distribution network. The time frame of execution of transmission system should be discussed with DISCOMs & CTU in order to avoid stranded assets and idle investments.



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17. Therefore, the Commission should direct that no transmission system strengthening proposals should be executed without the prior approval of the Commission. OPTCL should submit the comprehensive system study along with requirements as specified in the licence conditions of OPTCL and tariff regulations for approval of the Commission before proceeding for execution of the project.
18. The Commission therefore should direct OPTCL to take up the matter with Government of Odisha to fund the economically unviable projects and the other projects that are required for the larger interest of the State through grants.
19. OPTCL should be directed to consider the meter data to assess the month-wise transmission loss in intra-state transmission system including losses at different voltage levels (i.e. 132 kV, 220 kV and 400 kV levels).
20. The Hon'ble commission may consider our views and accordingly pass appropriate orders.

**PRAYER**

In the facts and circumstances stated above and in the interest of the parties and the larger interest of the State the Hon'ble Commission be pleased to pass appropriate orders to the effect that

1. ARR of OPTCL may be approved accordingly based on the submission made above.
2. The Transmission Charges should be reviewed and reduced substantially.
3. Transmission loss to be reduced considering the submission made for FY 2025-26.
4. Proposal of Reactive energy charges of 3 paise/KVARh should be reduced.
5. Proposal of OPTCL to levy of Grid Support Charge for connectivity may be rejected.
6. Each year truing up exercise and business plan approval should be carried out by Hon'ble commission through a process of public hearing.

Place: Bhubaneswar

For . The Utkal Chamber of  
Commerce & Industry Ltd.

Date: 15.01.2025

*[Signature]*

Chairman - Expert Committee For  
Electricity & Power  
THE UTKAL CHAMBER OF COMMERCE & INDUSTRY LTD.  
N/6,IRC VILLAGE,NAYAPALLI,BBSR-15



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BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur  
Bhubaneswar-751021

Case No: 93/2024

Filing No: 1

IN THE MATTER OF:

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022.

... Applicant

AND

IN THE MATTER OF:

The Utkal Chamber of Commerce & Industry Ltd. (UCCI), N-6, IRC Village, Nayapalli, Bhubaneswar-751015, Email: [pwrtch@gmail.com](mailto:pwrtch@gmail.com), [contactus@utkalchamber.in](mailto:contactus@utkalchamber.in), Phone-9437155337

...Respondent

Affidavit verifying the application

I, Shri Bibhu Charan Swain, son of Shri Baishnab Charan Swain, aged about 48 years, resident of Bhubaneswar, do solemnly affirm and state as follows :-

1. That I am the Chairman Electricity Power Committee, Utkal Chamber of Commerce & Industry, the Objector in the above Petition and am fully authorized by the said Objector to make this Affidavit on its behalf.

2. That the statements made herein are to the best of my knowledge and information available and I believe them to be true.

(The above named deponent being identified by ..... Advocate Bhubaneswar appears before me .. .... at 3.00 Pm states the Contents in this ..... are true to the best of his/her knowledge.)

PLACE: Bhubaneswar

DATE: 15.01.2025

identified by me'

Regd. Advocate

HARAJOHAN JENA  
NOTARY PUBLIC  
Govt. of Orissa, Regd.-1328  
LIB-84, Bhima Tangi  
Bhubaneswar-751002  
9937427282

DEPONENT

(Bibhu Charan Swain)

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**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION**

**PLOT NO. 4, CHUNAKOLI, SAILESHREE VIHAR,  
CHANDRASEKHARPUR, BHUBANESWAR-751021**

**CASE NO. 93/2024**

**FILING NO. 3**

**IN THE MATTER OF:** (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**And**

(ii) Truing up application for the FY 2023-24 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

**AND**

**IN THE MATTER OF:** Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

**..... Applicant**

**vrs**

**Utkal Chamber of Commerce & Industry Ltd. (UCCI), N-6,  
IRC Village, Nayapalli, Bhubaneswar-751015 and 15 others.**

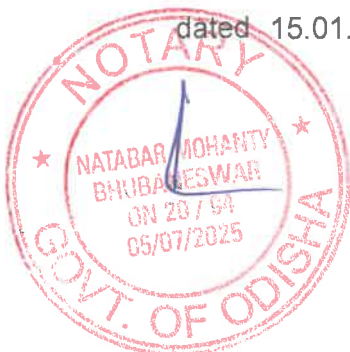
**..... Objectors**

**Rejoinder to the objections raised by the Objector Utkal  
Chamber of Commerce & Industry Ltd.**

**The humble applicant above named**

**MOST RESPECTFULLY SHEWETH:**

1. That, the Objector Utkal Chamber of Commerce & Industry Ltd. (UCCI) vide affidavit dated 15.01.2025 has raised certain submissions on ARR & Transmission Tariff



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*Prabir Kumar Mallik*

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Application of OPTCL for FY 2025-26 and Truing up application for FY 2023-24. In reply, OPTCL submits its rejoinder to the submissions in the following paragraphs.

**Rejoinder to Para 3 to 7:**

That, the respondent has submitted the statistical data of the previous years comparing the proposed vis-à-vis approved in respect of expenses towards human resource expenses , R&M expenses , A&G expenses, depreciation with a request to approve accordingly after due scrutiny. In this regard, it is pertinent to mention that OPTCL has submitted it ARR application for FY 2025-26 as per the various provisions stipulated in OERC (Terms & Conditions for Determination of Transmission Tariff) Regulations, 2014 and directions of the Commission passed in different orders with proper justifications.

**Rejoinder to Para 8:**

**Determination of Transmission Charges:**

The Transmission infrastructures are created considering the demand and request of the DISCOMs from time to time, after due approval form the Hon'ble OERC through Transmission Plan. Being a Transmission License, OPTCL has always endeavored to create the Transmission infrastructure for providing reliable and quality power to the consumers of DISCOMs. Accordingly, every year OPTCL is adding more transmission assets to meet the requirement of DISCOMs. Transmission Charge is arrived at 36.08 paise per unit by dividing the total ARR of OPTCL with the recent realistic MU projections of DISCOMs and recovered from them on a monthly basis. This rate will decrease if DISCOMs drawal increase. Alternatively, OPTCL is proposing to recover the Transmission charges on a monthly basis, based on the recent realistic MU projections of DISCOMs, **irrespective of the drawal.**

The proposed Transmission Charge of 36.08 p/u has been derived by considering the recent realistic energy demand projections of 38764.29 MU as communicated by the DISCOMs & other LTOA customers and the ARR figures have been arrived by OPTCL justifying component wise projections as per the provisions contained in OERC Transmission Tariff Regulations, 2014, OPTCL's Audited Accounts for FY 2023-24, all relevant data/information and materials. The details of projections are submitted in page 51-52 of the present ARR application of OPTCL for FY 2025-26. Moreover, OPTCL had furnished all requisite information and details as per the prescribed formats of the Hon'ble Commission with full justifications.

Hence, mere apprehension of the respondent towards imposition of excessive burden on Discoms seems to be inappropriate and unacceptable which is likely to be rejected at this juncture. Moreover, the contention of the stake holder operating in the



value chain of electricity needs to appreciate the fact that the cost recovery has to be in full so as to make the sector sustainable.

Hence, OPTCL does not agree with the views of the Objector.

**Rejoinder to Para 9 to 11:**

**Transmission Loss**

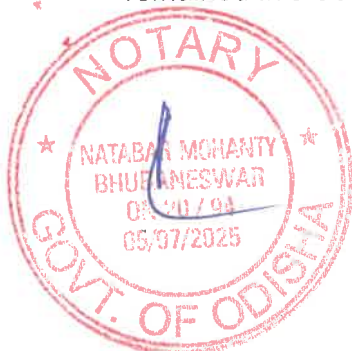
First of all, the proposal to approve transmission loss of OPTCL at 2.5% is baseless and without any study.

The actual transmission loss for the period **Apr' - Sep' 2024** is calculated to be **3.09%** as shown in the ARR & TT application for FY 2025-26 (page-229). This figure is **less than the actual** transmission loss during last year i.e. **3.11%** for **FY 2023-24**. In fact, OPTCL had projected Transmission loss of 3.05% for FY 2024-25, but Hon'ble Commission had set a target of 3.00% which could not be achieved yet.

In OPTCL system, the transmission loss is purely technical loss and a function of real time injection of power by a number of generators, system configuration and power flow requirements at different load centers. It depends on many parameters / factors such as distance and mismatch between generation and load centers, types of load, reactive power compensation, voltage profile, seasonal variation of demand load etc. Thus, OPTCL does not have much control over the same at any point of time. The transmission system of OPTCL operates as an integral part of the Eastern Region Grid to serve the internal demand of the State as well as to carry out import and export of power depending upon the system demand.

As of the matter of fact, some grid s/s and lines are being constructed in many remote and deprived areas funded under Central & State Govt. schemes in the interest of public. Additional length in EHT lines and Sub-stations in under-loaded areas are also responsible for increase in transmission loss.

The Transmission Loss in OPTCL network is in a gradually reducing trend over the years i.e. from 3.73% during 2014-15 to 3.11% in 2023-24 and has remained 3.09% within 1<sup>st</sup> six months of FY 2024-25 mainly due to addition of infrastructure and various system strengthening works taken up by OPTCL. The actual losses incurred over the years by OPTCL have been within the margin allowed by Hon'ble Commission up to the year FY 2017-18. However in FY 2018-19, the commission set the loss at 3.00% though the projected transmission loss was at 3.25% and thereafter the commission has been pegging the transmission loss at the same level though loss projected by OPTCL remained in a downward trend.



Year	Tr. Loss proposed	OERC Approval	Actual
2014-15	3.75%	3.75%	3.73%
2015-16	3.75%	3.75%	3.67%
2016-17	3.70%	3.70%	3.58%
2017-18	3.50%	3.50%	3.34%
2018-19	3.25%	3.00%	3.28%
2019-20	3.25%	3.00%	3.25%
2020-21	3.20 %	3.00%	3.22%
2021-22	3.15%	3.00%	3.18%
2022-23	3.10%	3.00%	3.15%
2023-24	3.10%	3.00%	3.11%
2024-25	3.05%	3.00%	3.09% (1 <sup>st</sup> six months )

From the table given above, it is also clear that each year upto FY 2017-18, the transmission loss achieved by OPTCL has remained at a level lower than the approved figures by Hon'ble commission and from FY 2018-19 the target set by OERC appears to be very stiff which was hard to achieve though **the trend of lesser transmission loss year after year has been achieved.**

That the transmission losses depend upon the voltage level at which the power is transmitted. The transmission losses are higher where the percentage of lower voltage (132kV or below) transmission system is higher. A comparison of the average transmission losses of a few state transmission licensees and their corresponding transmission assets at low voltage level (132 kV) is shown below.

**TRANSMISSION LOSS (%) OF OTHER STATES OF LOW VOLTAGE LINES  
UPTO 132KV FOR FY 2023-24**

States	% of Low voltage Lines (up to 132 kV)			Actual Transmission Losses for FY 2023-24 (%)
	Transmission Lines up to 132kV (Ckm)	Total Transmission Lines (Ckm)	% of Transmission Lines up to 132kV	
Odisha (OPTCL)	8479.831	16508.068	51.36%	3.11
Uttar Pradesh (UPPTCL)	28733	60145	47.77%	3.22
Gujarat (GETCO)	44512	73054	60.93%	3.83

It may be kindly be appreciated that the transmission loss (technical) is bound to happen as per law of physics and is very difficult to reduce after a certain level. Also, at all India level, the transmission loss of utilities have remained at more than 3.00% and



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Roabeer Kumar Mallick

to suffice our view point the table is given below for kind appreciation of Hon'ble Commission.

**Transmission loss of Different states for FY 2023-24**

Name of states	Tr. loss approved by State Commission	Actual Tr. loss
Uttar Pradesh (UPPTCL)	3.22%(UERC)	3.22%
Gujarat (GETCO)	3.60% (GERC)	3.83%
Assam (AEGCL)	3.30%(AERC)	3.30%
Rajasthan (RVPN)	4.50%(RERC)	4.23%
Himachal Pradesh (HPPTCL)	3.19% (HERC)	3.25%

All India average transmission loss for the period 06-01-2025 to 12-01-2025 as published by Grid Controller Of India Limited, National Load Despatch Centre dated 18.01.025 is 4.00 %. Further, as per the CEA General Review 2024 (Containing Data for the Year 2022-23) the transmission loss of Eastern Region is 3.37% (attached as **Annexure-01**). Present transmission loss level of OPTCL is much less than both the said cases (i.e. Grid Controller Of India Limited & CEA General Review 2024).

However, as a responsible Transmission utility, OPTCL is making an all-out effort to reduce the transmission loss further by undertaking various **system operation and loss reduction measures** by implementing the emerging technologies like **system Automation**, load bifurcation, **modification in system configuration**, procurement of more efficient equipment, **Digitalization of grids** by using SAS, Protection system improvement using Busbar protection and Event Logger, **Conversion of Radial to Ring system**, Advanced Metering Infrastructure etc. to bring it to **3.05% by FY 2025-26**.

**Regarding inadvertent power**

OPTCL does not agree to the assumption of the respondent that around 985MU of inadvertent power will be injected in OPTCL system in a year considering the CGP capacity 9850MW. In this regard it is submitted that during the last six months, it is observed that total inadvertent power injection is 239.38MU which has been already considered while calculating the Transmission loss of 3.09% in form T-6. Hence, Transmission loss as suggested by the Objector is not just and proper. Details of inadvertent power injected by CGPs in FY 2024-25 till November is attached as **Annexure-02**.



Further, it is submitted that Transmission charge is being computed on Open access transactions based on scheduled energy. Hence, OPTCL does not reap any benefit out of inadvertent power.

**Steps taken for Energy Audit**

Around 2600 nos. of 0.2s Accuracy Class ABT Energy meters are required for different metering points at all Grid Substations of OPTCL for billing and audit purposes. 538 nos. of meters have been installed by OPTCL at different metering points. 2000 nos. energy meters will be installed at different Grid Substations under SAMAST Project, out of which 70 nos. meters have been installed and the installation process of balance meters are in progress. The installation of energy meters for balance metering points under **SAMAST** Project will be completed by 31st October 2025. After installation of the meters, energy audit and calculation of transmission losses of OPTCL on an element-wise at different voltage levels will be feasible.

**Rejoinder to Para 12:**

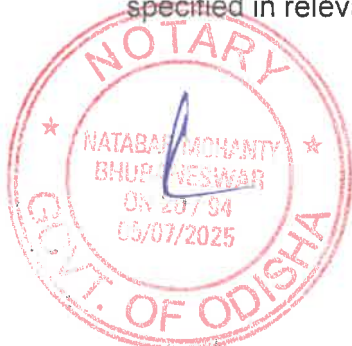
**Open Access Charges:**

That the system peak demand of 6927.78 was touched on dated.19.10.2024. Statement on the loading pattern of the existing transmission system (400kV, 220kV, 132kV power transformers and EHT lines) corresponding to the peak demands is attached as **Annexure-03**. OPTCL has already conducted load flow study considering different load scenario i.e Summer peak, Winter lean, High hydro, Low Hydro & Solar Peak, in the Revised 14<sup>th</sup> Intra-state Transmission Plan of Odisha for FY 2022-23 to FY 2026-27, which has been approved by Hon'ble Commission vide case no. 08/2024. In the aforesaid report percentage loading of all Transmission line, ICT, Auto & Power Transformers till FY 2026-27 have been mentioned. The Transmission infrastructures are created considering the demand and request of the DISCOMs from time to time, after due approval form the Hon'ble OERC through Transmission Plan and the DISCOMs and other LTOA customers are responsible to bear the full approved ARR of OPTCL. STOA charges is being charged as per the Open Access Regulations, 2020.

**Rejoinder to Para 13:**

**Reactive Energy Charges:**

As per Regulation 31(1) under Chapter-7 (IMBALANCE AND REACTIVE ENERGY CHARGES) of the OERC (Terms and Conditions of Intra-State Open Access) Regulations, 2020, payment for the reactive energy charges by open access consumers shall be in accordance with provisions stipulated in the State Grid Code or as may be specified in relevant regulations/orders of the Hon'ble Commission .



*Poober Kumar Mallik*

The Hon'ble Commission in Para 16 (page 5) of the order dated 05.02.2019 in Case No. 50/2017 has inter alia viewed that the provisional reactive energy charges of 3 paise/KVARh as allowed in the ARR order of OPTCL for FY 2018-19 continue for time being till a final justification is submitted by OPTCL in consultation with the stakeholders. However, OPTCL **has not realized any revenue** from Reactive Energy Charges so far.

In view of the above, OPTCL proposes that 3paise/KVARh may be approved provisionally as Reactive Energy Charges for FY 2025-26.

Hence, rejection of the proposal of OPTCL with regard to Reactive Energy Charges as suggested by the Objector is not just and proper.

**Rejoinder to Para 14:**

**Levy of Grid Support Charge for connectivity:**

The benefits derived by the CGPs with co-located loads are enormous. The benefits are in the nature of ancillary services which are not paid till now. The Grid support charges (GSC)/Parallel operation charge has been levied by different state Regulatory Commissions and upheld by APTEL and Supreme Court of India through various orders and hence proposed by OPTCL through a separate petition. Recently, OPTCL had filed an application (case No. 44 of 2024) on 26.06.2024 for determination and approval for levy of Grid Support Charges for industries having Captive Generating / Cogeneration plants and running in parallel with the Grids of OPTCL. Hon'ble Commission in its order directed OPTCL to submit a consolidated report considering the observations/queries raised by the stakeholders in the earlier Cases filed by OPTCL. In compliance to above, OPTCL is in final stage of preparation of the required consolidated report and will be submitted before Hon'ble Commission shortly.

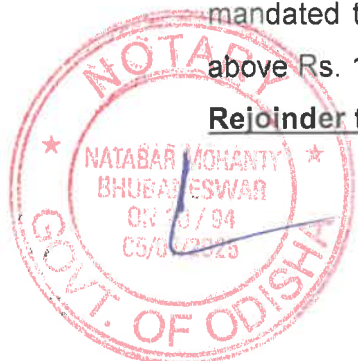
**Rejoinder to Para 15 & 16:**

To prevent overloading, regular system study has been carried out and augmented the network capacity as when required. Priority has been given to use of under loaded network. As directed by Commission regular meeting has been conducted with DISCOMs for creation of downstream infrastructure for optimum utilization transmission networks.

**Rejoinder to Para 17:**

OPTCL always executes its projects which are either approved in Business Plan of OPTCL or Intra State Transmission Plan. As per the license conditions, OPTCL is mandated to take prior approval of Hon'ble Commission for any transmission projects above Rs. 10 Cr. which OPTCL has been following scrupulously.

**Rejoinder to Para 18:**





Since the creation of a transmission infrastructure requires huge investments, OPTCL always request state Government for financial support. State Govt. has been contributing 100% financial assistance in shape of grant/equity in case of non-remunerative and contributing 30% equity support in case of remunerative projects.

2. The objections not specifically admitted may be deemed to have been denied.

**PRAYER**

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of Utkal Chamber of Commerce & Industry Ltd. while approving ARR and Transmission Tariff of OPTCL for FY 2025-26 & Truing up application for the FY 2023-24.

Bhubaneswar  
January 31, 2025

By the Applicant  
Through

*Poo Beer Kumar Mallick*

Sr. GM (El.), RT&C



**Table 6.2**  
**Regional Transmission Losses**  
**Utilities**  
**2022-23**

Region	Energy Available in the Region (GWh)	Export to other Region (GWh)	Export to Nepal (GWh)	Export to Bangladesh (GWh)	Export to Bhutan (GWh)	Export to Myanmar (GWh)	Total Energy drawal by States/Utilities (GWh)	Transmission Losses (GWh)	Transmission Losses (%)
1	2	3	4	5	6	7	8	9 (2-3-4-5-6-7)	10((8/2)x100)
Northern Region	235784.74	3399.70	343.64	0.00	0.00	0.00	224171.69	7869.71	3.34
Western Region	282367.53	57344.05	0.00	741.34	0.00	0.00	215219.30	9062.84	3.21
Southern Region	173393.55	7625.46	0.00	3491.13	0.00	0.00	156314.82	5962.13	3.44
Eastern Region	134352.68	57191.16	314.03	7547.70	266.30	0.00	64506.41	4527.08	3.37
North Eastern Region	21117.54	4662.00	0.00	1039.50	38.47	9.81	14499.49	868.27	4.11

STATEMENT OF FREE POWER OF CGPS FOR FY 2024-25

SL. No.	CGP Stations	STATEMENT OF FREE POWER OF CGPS FOR FY 2024-25												TOTAL Injected (In Kwh)
		APRIL'24 Injected (In Kwh)	MAY'24 Injected (In Kwh)	JUN'24 Injected (In Kwh)	JULY'24 Injected (In Kwh)	AUG'24 Injected (In Kwh)	SEPT'24 Injected (In Kwh)	OCT'24 Injected (In Kwh)	NOV'24 Injected (In Kwh)	TOTAL				
1	IMFA	9,64,093	8,71,590	9,66,013	6,90,482	6,60,805	8,44,052	11,81,938	8,61,089	70,40,062				
2	NALCO	10,68,227	11,48,265	82,715	3,79,525	1,19,400	2,91,407	7,95,571	3,54,861	42,39,971				
3	ARATI STEELS	8,62,606	9,17,113	7,95,889	8,37,134	9,54,267	7,77,542	12,32,834	4,38,520	68,15,905				
4	Aryan Ispat Ltd.	1,89,004	75,496	94,374	1,28,766	75,923	1,18,270	1,13,984	93,094	8,88,911				
5	BPSL	55,93,922	73,91,485	59,86,547	47,02,977	55,65,774	84,85,797	73,22,641	56,03,633	5,06,52,776				
6	TATA BSL (BSL)	1,04,87,992	80,79,802	1,02,02,963	1,00,97,489	59,31,643	69,64,899	1,07,69,509	78,60,310	7,03,94,607				
7	DINABANDHU	-	-	28,262	5,86,618	7,74,738	6,15,824	3,96,009	4,16,635	28,18,086				
8	HINDALCO	12,76,300	13,30,670	13,48,750	14,65,620	15,47,850	13,96,940	14,27,620	15,00,550	1,12,94,300				
9	IFFCO	730	210	480	1,990	31,380	55,630	4,700	140	95,260				
10	JSL	10,68,260	10,39,500	12,65,930	8,91,100	7,64,870	7,70,640	9,64,040	11,83,350	79,47,690				
11	JSP	37,70,844	28,08,670	34,11,545	54,03,917	9,81,356	23,35,330	40,58,051	83,47,885	3,11,17,598				
12	BPPL	1,30,416	1,35,928	1,54,348	2,60,512	3,73,954	8,90,365	2,25,416	1,78,372	23,49,311				
14	MAITHAN	14,48,004	9,09,222	4,00,413	6,83,208	10,57,109	9,66,770	10,59,627	7,65,805	72,90,158				
15	NARBHERAM	2,01,659	58,238	1,03,200	-	56,914	2,25,360	1,47,510	2,39,699	10,32,580				
16	NINL	5,028	26,323	96,885	96,885	5,696	95,165	11,240	3,849	2,44,197				
17	MGM	1,82,571	1,45,479	2,35,893	2,52,226	2,21,855	2,06,940	3,12,429	2,19,178	17,76,571				
18	NAVA LTD.	4,20,921	4,75,773	6,19,574	5,53,073	7,28,331	5,59,808	4,39,361	5,28,169	43,25,010				
21	DALMIA CEMENT (OCL)	2,99,204	3,75,083	2,94,627	3,14,046	1,72,849	3,16,147	2,67,925	2,33,407	22,73,288				
22	Debtor (Dalmia Kapilas)	66,891	69,910	60,865	80,334	1,19,485	1,63,380	86,986	65,883	7,13,734				
23	PATNAIK STEEL	2	1	1	-	14	-	460	5	483				
24	RSP	3,45,754	1,88,727	1,65,840	8,04,091	1,12,524	4,43,299	5,56,802	3,34,735	29,52,200				
25	MSP METALICS	1,59,426	-	75,880	1,66,416	1,11,304	1,39,010	1,22,197	1,67,099	9,41,332				
26	SHYAM METALICS	1,38,910	2,80,040	74,430	1,94,760	1,21,420	1,68,600	38,210	1,57,180	11,73,550				
27	TATA SPONGE	2,29,645	2,60,280	1,46,805	2,05,081	3,30,178	4,44,025	2,84,981	3,81,790	22,82,785				
28	VAL JHARSUGUDA	2,30,917	3,43,139	2,62,600	2,42,700	2,30,926	4,54,063	5,40,147	3,10,124	26,14,616				
29	VAL LANJGARH	2,75,100	4,13,880	6,10,070	7,13,440	6,33,460	7,86,250	8,79,780	6,37,430	49,49,410				
30	VISA	7,71,061	10,05,163	9,47,300	9,47,300	30,61,941	12,17,792	14,18,462	12,09,048	96,30,267				
31	OSISL	7,65,935	4,69,738	3,29,024	2,69,420	5,23,439	3,70,361	5,48,210	3,71,584	36,47,711				
34	SHREE GANESH	1,00,210	1,55,053	2,54,522	3,41,391	4,46,352	4,17,582	4,09,942	10,46,114	31,71,166				
35	FACOR	2,65,677	5,50,814	7,41,583	8,52,098	6,34,255	7,53,202	8,37,072	7,47,334	53,82,035				
36	ADITYA(LAPANGA)	6,78,480	8,25,910	8,25,390	7,56,250	8,02,740	7,21,920	8,59,310	7,69,820	62,39,820				
37	Arcellor Mittal Nippon Steel	4,772	90,245	99,500	1,11,325	65,628	29,951	55,182	58,708	5,15,311				
38	BEL	2,10,320	2,69,476	2,62,673	2,75,829	2,49,068	1,95,433	2,25,838	1,87,062	18,75,699				
40	Viraj steel	6,27,076	8,81,557	8,63,335	11,05,979	7,99,391	62,967	5,69,458	5,82,286	54,92,049				
41	RUNGTA MINES DSP	30,64,885	34,10,700	31,31,957	33,01,927	26,70,196	33,64,501	33,82,666	27,08,923	2,50,35,755				
42	Runga mines(Kamanda steel ltd.)	5,57,936	6,40,070	5,87,227	3,86,202	2,21,501	4,01,154	3,09,846	4,97,457	36,01,393				
43	Runga mines(Kamanda steel ltd.)	12,15,441	1,23,304	1,604	16,842	2,98,357	3,89,125	44,787	18,658	21,08,118				
44	SMC JHARSUGUDA	4,28,253	5,30,964	5,22,235	5,29,910	4,25,823	4,82,690	6,53,975	2,05,400	37,79,250				
45	SMC BADMAL	2,11,681	1,87,531	4,95,099	4,79,752	4,68,993	4,71,241	4,18,625	1,30,510	28,63,432				
46	ABREL	35,599	53,714	33,667	42,270	38,116	38,364	35,739	27,841	3,05,310				
47	KJS ALUWALIA	2,42,458	26,81,937	8,05,113	10,75,172	3,71,659	6,54,355	11,680	1,1680	58,42,374				
48	SHREE CEMENT	43,307	77,658	1,48,698	1,72,642	2,11,054	2,05,650	1,46,729	93,075	10,98,813				
49	JAGANNATH POWER	4,31,538	6,59,109	7,10,884	8,95,731	9,60,536	4,04,745	6,09,344	7,82,263	54,54,150				
50	ABREL KHAJURIAKATA	7,74,171	55,849	45,539	74,081	72,652	56,116	50,496	44,857	11,73,761				
51	THAKUR PRASAD	-	-	-	-	7,00,673	1	5	1	7,00,680				
53	ADHUNIK METALICS	-	-	-	-	-	-	-	-	5,93,528				
54	OCL	3,98,45,226	3,73,05,387	4,00,96,511	4,01,69,132	3,54,10,340	3,84,69,467	4,44,70,009	4,15,39,394	31,73,05,466				
	TOTAL CGP	39,85	37,31	40,10	40,17	35,41	38,47	44,47	41,54	317,31				
	TOTAL (MU)													

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**Loading pattern corresponding to the peak demand of 6928 MW  
(including Vedanta drawal) on 19-JUNE-2024 AT 16:00 hrs**

FEEDER NAME	MW	Rated Capacity in MW	% Loading
400KV MENDHASAL - PANDIAVAL2	50.43		
400KV MERAMUNDALI-BOL_PG	0.00		
400KV MERAMUNDALI-KANIHA1	-637.76		
400KV MERAMUNDALI-KANIHA2	-385.39		
400KV INDRAVATI ICT1	-67.47		
400KV INDRAVATI ICT2	-66.91		
400KV MERAMUNDALI-BOL_PG	0.00		
400KV DUBNW- KALABADIA	-368.96		
400KV_OPGC-JHARS_PG - 1	230.36		
400KV_OPGC-JHARS_PG - 2	150.50		
MENDHASAL -PANDIAVIL 1	49.34		
DUBNW- PANDIAVAL	75.67		
VEDANTA-JHARSUGUDA1 PG	-40.51		
VEDANTA-JHARSUGUDA2 PG	-40.23		
220KV JODA-JAMSHEDPUR	5.54	192	3%
220KV JODA-RAMCHANDRAPUR	-156.72	192	86%
KATAPALLI2-BOLAN PG	0.00	192	0%
SADEIPALLI2-BOLAN PG	-127.65	192	70%
220KV RENGALI-RENGALI PG 1	24.96	192	14%
220KV RENGALI-RENGALI PG 2	9.33	192	5%
220KV RENGALI-KANIHA	-132.61	192	73%
220KV TTPS-KANIHA	136.08	192	75%
220KV MERAMUNDALI-KANIHA 1	-107.71	192	59%
220KV MERAMUNDALI-KANIHA 2	-103.58	192	57%
220KV JAYANAGAR-JEPORE PG 1	-22.71	192	12%
220KV JAYANAGAR-JEPORE PG 2	-23.86	192	13%
220KV BUDHIPADAR-KORBA 1	-4.14	192	2%
220KV BUDHIPADAR-KORBA 2	-2.92	192	2%
220KV BUDHIPADAR-KORBA 3		192	0%
220KV TARKERA-BISRA 1	-201.68	350	61%
220KV TARKERA-BISRA 2	-205.17	350	62%
132KV KALABADIA-BANGIRIPOSI	62.92	76	87%
132KV KALABADIA-BARIPADA	66.95	76	93%
220KV KALABADIA-BALASORE 1	176.81	192	97%
220KV KALABADIA-BALASORE 2	177.28	192	97%
NET - KALABADIA DRAWL	-916.91		
ATRI_AUTO-1	98.39	160	65%
ATRI_AUTO-2	98.61	160	65%
BALAS AUTO1	-77.17	160	51%
BALAS AUTO2	-76.75	160	50%
BALAS_AUTO-3	-76.34	160	50%
BHADR AUTO1	0.00	100	0%
BHADR AUTO2	91.01	160	60%
BHADR_AUTO-3	91.84	160	60%

BHANJ AUTO1	53.54	160	35%
BHANJ AUTO2	47.17	160	31%
BIDAN AUTO1	-54.85	100	58%
BIDAN AUTO2	0.00	100	0%
BIDAN AUTO3	23.75	160	16%
BOLNW AUTO1	67.28	160	44%
BOLNW AUTO2	70.89	160	47%
BOLNW_AUTO-3	66.65	160	44%
BUDHI AUTO1	92.49	160	61%
BUDHI AUTO2	52.98	160	35%
BURLA AUTO1	35.41	100	37%
BURLA AUTO2	35.34	100	37%
BURLA_AUTO-3	53.04	160	35%
CHAND AUTO1	56.32	100	59%
CHAND AUTO2	97.51	160	64%
CHAND AUTO3	60.82	100	64%
CHAND AUTO4	94.03	160	62%
DUBURI AUTO1	58.66	160	39%
DUBURI AUTO2	56.70	160	37%
DUBURI AUTO3	37.08	100	39%
GODA_AUTO-1	30.13	160	20%
GODA_AUTO-2	30.47	160	20%
JAYAN AUTO1	47.72	160	31%
JAYAN AUTO2	40.76	160	27%
JODA AUTO1	64.76	160	43%
JODA AUTO2	65.89	160	43%
JODA AUTO3	53.73	100	57%
LAPAN_AUTO-1	81.15	160	53%
LAPAN_AUTO-2	81.07	160	53%
MERAM AUTO1	39.55	100	42%
MERAM AUTO2	38.57	100	41%
MERAM AUTO3	37.43	100	39%
NAREN AUTO1	0.00	160	0%
NAREN AUTO2	0.00	160	0%
NAREN AUTO3	0.00	100	0%
PARAD AUTO1	-46.12	100	49%
NAYAG POWXFMR1	22.55		
NAYAG POWXFMR2	13.44		
NAYAG POWXFMR3	-22.16		
TATAPOWER1	-4.60		
TATAPOWER2	-2.02		
VAL DRAWAL	-959.45		
VEDANTA IPP	499.41	600	88%
ATRI-PANDIAVIL-1	-107.98	192	59%
BHOGRAI-KUCHEI	-29.34	76	41%
JALESWAR-KUCHEI	-40.58	76	56%
ADITYA_LOAD	0.00		
INFA-THERU	37.25	76	52%
ATRI-PANDIAVIL-2	-108.85	192	60%
220KV_KJHAR_GR-KEONJ_PG-1	-11.58		

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220KV_KJHAR_GR -KEONJ_PG - 2	-11.75		
LAXMIPUR_POWER TRANSFORMER	2.97	20	16%
PARAD AUTO2	-74.20	160	49%
PARAD AUTO3	-67.87	160	45%
TARKE AUTO1	50.91	100	54%
TARKE AUTO2	52.13	100	55%
TARKE AUTO3	51.04	100	54%
TARKE AUTO4	0.00	100	0%
THERU AUTO1	-22.22	100	23%
THERU AUTO2	21.45	100	23%
TTPS AUTO1	411.78		
TTPS AUTO2	0.00		
BOLNW_BOLAN_PG-2	-127.65	192	70%
132 KV ANAND_BAITARANI PWR	-0.03		
220 KV_NAREN_TATA GOPALPUR FDR-1	0.00	192	0%
220 KV_NAREN_TATA GOPALPUR FDR-1	3.32	192	2%
220 KV_JAYAN_JEYPO FDR-3	-20.90	192	11%
220 KV_JAYAN_JEYPO FDR-4	-23.87	192	13%
KESINGA - BOLANGIR PG	-60.98	192	33%
PRATAPSASAN-PANDIAVIL - 1	-111.61	192	61%
PRATAPSASAN-PANDIAVIL - 2	-111.83	192	61%
220 BUDHIPADAR - SMC 1	-13.22	192	7%
132 LAPAN - SMC	21.64	76	30%
132KV JODA-KENDUPOSI	22.42	76	31%



**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION**  
**Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur**  
**Bhubaneswar-751021**

**Case No: 93/2024**  
**Filing No: 1**

**IN THE MATTER OF:**

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**AND**

**IN THE MATTER OF:**

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022.

**... Applicant**

**AND**

**IN THE MATTER OF:**

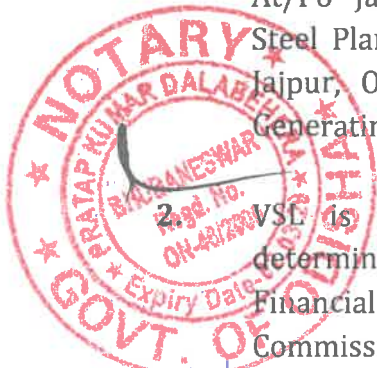
M/s. Visa Steel Limited, Kalinganagar Industrial Complex, At/Po- Jakhapura, Dist- Jajpur, Odisha-755026, Email: dr.dash@visasteel.com, Mobile: 9777958822

**...Respondent**

**The humble respondent above named most respectfully submit as under:**

1. That the objector i.e. M/s. Visa Steel Limited (hereinafter referred as "VSL" / "Respondent") is a company incorporated under the provisions of the Companies Act, 1956, having its Registered Office at VISA House, 11 Ekamra Kanan, Nayapalli, Bhubaneswar - 751015, Odisha and plant site at Kalinga Nagar Industrial Complex, At/Po- Jakhapura-755026, Dist- Jajpur, Odisha. That VSL has set-up an Integrated Steel Plant at Kalinga Nagar Industrial Complex, At/Po- Jakhapura-755026, Dist- Jajpur, Odisha. The Applicant has also installed Co-generation based Captive Generating Plant of 3 x 25 MW Capacity in its plant premises.

VSL is submitting the following points on the application of OPTCL for determination of Annual Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 for kind review and necessary action by the Hon'ble Commission.



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*16.1.25*



*Dwijargy' Dash*

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**3. Human Resources Expenses:**

The OPTCL has projected Employee Cost expenditure at Rs. 554.05 Crore for FY 2025-26 against Rs. 488.63 Crore as approved by the Commission to be spent during FY 2024-25. The summary of Employee Expenses of OPTCL for the last fourteen financial years is furnished below.

**Summary of Employee Expenses**

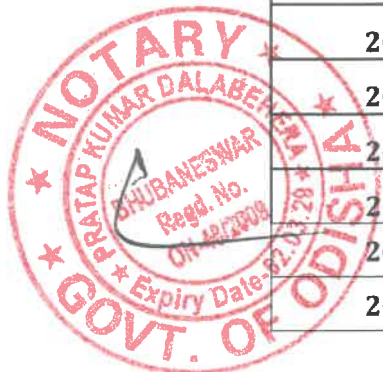
Financial Year	Proposed	Approved	Actual
2010-11	865.13	279.56	173.11
2011-12	952.06	338.14	279.56
2012-13	655.36	318.48	268.59
2013-14	341.2	289.3	191.70
2014-15	361.38	318.18	309.59
2015-16	310.02	305.23	285.95
2016-17	399.56	292.55	382.44
2017-18	462.33	304.5	380.32
2018-19	419.57	360.4	375.65
2019-20	421.99	419.77	394
2020-21	466.22	415.87	373.19
2021-22	532.73	457.88	474.83
2022-23	526.53	477.19	
2023-24	508.76	449.08	
2024-25	582.06	488.63	
2025-26	554.05		

The cost break-up of the employee expense is provided below:

Sl. No	Particulars	Prev. Year 2023-24	Curr. Year 2024-25	Ensuring Year 2025-26
<b>A</b>	<b>Salary &amp; Allowance</b>	<b>1</b>	<b>2</b>	<b>3</b>
1	Basic Pay	156.70	156.69	160.16
2	Dearness Allowance	69.32	89.75	97.70
3	House Rent Allowance	23.18	25.07	25.87
4	Medical Allowances	7.51	8.71	8.41
5	Conveyance Expenses (allowance+Reimbursement)	2.84	3.42	3.88



*Sarjraj Dash*  
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6	Other Allowance	1.28	1.53	1.96
7	Bonus	0.01	0.01	0.01
8	Stipend for New Recruitment	8.49	10.00	10.53
9	Stipend to Apprentice	1.64	3.00	2.74
10	Arrear Salary for Wage Board Revision	-	6.65	-
	<b>Sub-total (A)</b>	<b>270.97</b>	<b>304.83</b>	<b>311.27</b>
<b>B</b>	<b>Additional Employee Cost</b>			
1	Out Sources Engagement	3.46	5.58	6.81
	<b>Sub-total (B)</b>	<b>3.46</b>	<b>5.58</b>	<b>6.81</b>
<b>C</b>	<b>Other Employee Cost</b>			
1	Leave Travel Concession	0.09	0.63	0.63
2	Honorarium	0.09	0.12	0.12
3	Ex-gratia	7.20	5.00	8.84
4	Staff Welfare Expenses	11.07	6.75	10.81
5	Other Employee Cost	0.52	0.02	0.02
6	Capacity Building Charges	1.05	1.02	2.40
	<b>Sub-total (C)</b>	<b>20.02</b>	<b>13.54</b>	<b>22.83</b>
<b>D</b>	<b>Terminal Benefits</b>			
1	Pension	165.77	170.41	175.53
2	Gratuity	11.66	12.01	12.37
3	Leave Salary	14.79	15.16	15.62
4	Other (including contribution to NPS)	21.91	22.62	24.52
	<b>Sub-total (D)</b>	<b>214.12</b>	<b>220.20</b>	<b>228.03</b>
<b>E</b>	<b>Total Employees Cost (A+B+C+D)</b>	<b>508.57</b>	<b>544.15</b>	<b>568.95</b>
F	Less: Employees Cost Capitalised	14.90	14.90	14.90
<b>G</b>	<b>Net Employee Cost ( E- F)</b>	<b>493.67</b>	<b>529.25</b>	<b>554.05</b>

- **Basic Pay and Grade Pay:** Basic Pay and Grade Pay proposed for FY 25-26 = Rs. **160.16** Cr. is based on actual cash flow for FY 24-25 with additional increment of 3% and average number of employee. OPTCL is planning to recruit 172 Nos. employees during FY 2024-25 and 280 Nos. in FY 2025-26.

**DA:** OPTCL proposed 61% DA for FY 2025-26, considering Finance Dept guidelines. However, actual increase in DA may be reviewed.

**HRA:** OPTCL proposed HRA @19%. Actual cash flow may be considered.



*Sarjraj Dash*

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- **Outsourcing:** OPTCL is functioning with 50% of manpower and has outsourced services. Accordingly, Rs. 6.81 Cr. has been proposed towards payment to outsourced personnel. The same can be reviewed.
- OPTCL is planning to recruit 172 Nos. employees during FY 2024-25 and 280 Nos. in FY 2025-26 and has proposed Rs.10.53 Cr. towards stipend for the new recruiters. Considering the past trend of recruitment the same may be reviewed.
- Actual addition of employees is lesser than the approved. Stipend and employee cost should be approved by reviewing proposed addition of employees.
- Terminal benefits should be reviewed on actual cash flow basis.

Hence the Employee cost Expenses of OPTCL for FY 2025-26 may be approved accordingly by the Hon'ble Commission.

#### 4. Repair and Maintenance (R&M) expenses

That the OPTCL has projected Repair and Maintenance Expenses at Rs. 217.7 Cr for FY 2025-26 against Rs. 135 Crs as approved by the Commission to be spent during FY 2024-25.

The summary of Repair and Maintenance (R&M) expenses of OPTCL for the last fourteen financial years is furnished below.

Summary of R & M Cost

Financial Year	Proposed	Approved
2010-11	98.14	60
2011-12	93.89	75
2012-13	95.46	95
2013-14	108.91	60
2014-15	146.77	93
2015-16	154.11	108
2016-17	170.66	110.59
2017-18	155.11	124.97
2018-19	156.19	111
2019-20	115.22	115.22
2020-21	140.59	115.22
2021-22	151.1	118.61
2022-23	148.04	110.5
2023-24	164.34	135



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2024-25	169.3	135
2025-26	217.7	

**5. Administration & General Cost**

That the OPTCL has projected Administrative and General (A&G) expenditure at Rs. **49.8 Crs** for FY 2025-26 against Rs. **37.05 Crs** as approved by the Commission to be spent during FY 2024-25.

The summary of Administrative and General Expenses of OPTCL for the last fourteen financial years is furnished below.

**Summary of A&G Cost**

Financial Year	Proposed	Approved
2010-11	26.99	15.14
2011-12	38.34	18
2012-13	39.11	21.25
2013-14	23.09	22.39
2014-15	25.46	24.01
2015-16	32.36	24.37
2016-17	25.58	24.66
2017-18	26.11	25.6
2018-19	27.23	26.44
2019-20	28.07	27.55
2020-21	28.66	28.72
2021-22	38.13	30.35
2022-23	43.18	37.73
2023-24	47.07	40.28
2024-25	51.13	37.05
2025-26	49.8	

The Hon'ble Commission may review the Inspection fee expenses and training expenses. Details of training calendar and its benefits may be checked.



*Sarjraj Dash*



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## 6. Depreciation Cost

That the OPTCL has projected depreciation expenditure at Rs. 356.57 Crs for FY 2025-26 against Rs. 275.67 Crs as approved by the Commission to be spent during FY 2024-25.

The summary of Depreciation of OPTCL for the last fourteen financial years is furnished below.

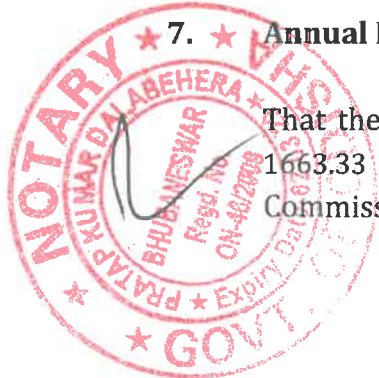
### Summary of Depreciation Cost

Financial Year	Proposed	Approved
2010-11	153.31	76.6
2011-12	156.4	79.42
2012-13	155.99	78.57
2013-14	172.85	89.4
2014-15	176.02	92.71
2015-16	197.72	107.48
2016-17	150.5	101.45
2017-18	192.59	130.76
2018-19	217.9	145.43
2019-20	186.03	162.06
2020-21	208.59	195.59
2021-22	276.5	232.95
2022-23	263	233.57
2023-24	293.96	269.54
2024-25	320.03	275.67
2025-26	356.57	

- Norms of tariff regulations and rates as specified in the Transmission Tariff regulations should be considered.
- The depreciation should be determined after due scrutiny.

## 7. Annual Revenue Requirement:

That the OPTCL has given the proposal for an annual revenue requirement of Rs. 1663.33 Crore for FY 2025-26 against Rs. 913.7 Crore as approved by the Commission to be spent during FY 2024-25.



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The summary of ARR of OPTCL for the last fourteen financial years is furnished below.

Financial Year	Proposed	Approved
2011-12	1435.88	579.34
2012-13	1348.46	612.53
2013-14	874.74	597.87
2014-15	988.8	641.3
2015-16	1008.36	630.94
2016-17	975	623.25
2017-18	1013.63	639.4
2018-19	990.65	659.95
2019-20	861.27	706.71
2020-21	966.44	713.84
2021-22	1307.17	792.93
2022-23	1247.14	831.95
2023-24	1102	896.18
2024-25	1380.69	913.7
2025-26	1663.33	

Hence the Annual Revenue Requirement of OPTCL for FY 2025-26 may be approved accordingly through a prudence check and based on the submission made above by the Respondent.

#### 8. Determination of Transmission Charges

OPTCL has given the proposal for transmission charges @ **36.08 P/U** for FY 2025-26 against 24 P/Unit as approved by the Commission during FY 2024-25. The proposed Transmission Tariff of **36.08 P/U** is very high and should not be permitted. This will adversely affect the RST of the DISCOMS and will be a huge burden on the consumers of Odisha.

#### 9. Transmission Loss:

OPTCL has proposed transmission loss at 3.05%. In conformity with the power sector reform, OPTCL needs to reduce the transmission loss significantly. We propose to approve transmission loss of OPTCL at 2.5%.



*Sudhakar Jadh*  
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That OPTCL have not yet identified the areas where loss is maximum, so as to formulate action plans for loss reduction. OPTCL should inform the methodology adopted to estimate the transmission loss for every year. OPTCL should have undertaken energy audits of lines and substations to know the quantum of transmission loss in the system. Proposing the transmission loss arbitrarily without giving the breakup of the losses in different components of transmission system i.e., lines, substations, power transformers and auto transformers etc are not appropriate for the S.T.U. Thus proposing loss as per the business plan is meaningless. There is enough measure by which OPTCL could reduce the Transmission loss. OPTCL should conduct energy audits and their standard performance should be monitored by a third party auditor appointed by the Commission so as to assess the actual performance of the licensees.

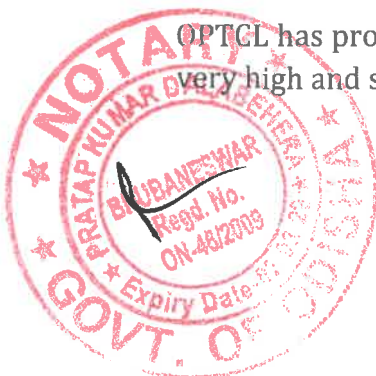
#### 10. Open Access Charges:

In order to have an insights on the loading of existing transmission systems corresponding to the system peak demand of 6927.78 MW as touched in the month of June 2024, Hon'ble OERC has desired OPTCL to submit 400 kV, 220 kV, 132 kV Power Transformer and EHT lines loading. However OPTCL has only submitted the Power flow data only for 400 and 220 kV line. The 132 kV line load has not been furnished. OPTCL has not submitted all the Power Transformer and ICT loading. Moreover by only submitting only power transmitted on the peak demand day will not solve the purpose. In order to ascertain the margin availability, OPTCL may be directed to submit the maximum power handling capability, power flow and % loading of all the 400 kV, 220 kV, 132 kV line and Power Transformer, Auto Transformer, ICT Transformers. It is also desired that OPTCL should conduct load flow analysis to handle around 2000-3000 MW differential load in appropriate manner.

Once these data are made available, it can be ascertained that, there are sufficient margin is available in the transmission network and in order to utilize it fully, STOA should be promoted and the charges for the same may be kept at 1/4 of the MTOA and LTOA charges and necessary amendments in the regulations may be made.

#### 11. Introduction of Reactive Energy Charges:

OPTCL has proposed to introduce Reactive Energy Charges of 3 Paise / KVARh which is very high and should be reduced in consultation with various stakeholders.



**12. Levy of Grid Support Charge for connectivity:**

OPTCL has submitted an application to the Hon'ble OERC on September 23, 2020, to determine and approve the imposition of Grid Support Charges for industries with Captive Generating/Cogeneration plants that operate alongside the OPTCL grids.

The case was registered as OERC Case No.-52/2020, but it faced opposition in the Orissa High Court in petitions filed by Vedanta Limited and CCPPO Odisha. In an order dated July 6, 2023, the High Court suggested that if OPTCL wishes to pursue the imposition of Grid Support Charges, they should file a separate application with the OERC. The court emphasized that the OERC, under Section 181 of the Electricity Act, should examine the justifiability of such charges. Accordingly, the regulation has to be framed first for the above cause, then only OPTCL shall file for approval of such charges before the Hon'ble OERC in subsequent Tariff Order. Therefore, the proposal of OPTCL to levy of Grid Support Charge for connectivity may be rejected.

**13.** The Commission may direct OPTCL to continuously monitor the operation of transmission system, prevent over loading/under loading wherever possible by taking suitable measures and take up innovative action for optimum loading of the existing network for further reduction of loss.

**14.** Further, OPTCL has mentioned that some of the substations are operating in under loaded condition because of absence of downstream infrastructure of DISCOMs. The Commission directs OPTCL to take action for a co-ordinated development of intra-state network, ISTS and downstream distribution network. The time frame of execution of transmission system should be discussed with DISCOMs & CTU in order to avoid stranded assets and idle investments.

**15.** Therefore, the Commission should direct that no transmission system strengthening proposals should be executed without the prior approval of the Commission. OPTCL should submit the comprehensive system study along with requirements as specified in the licence conditions of OPTCL and tariff regulations for approval of the Commission before proceeding for execution of the project.

**16.** The Commission therefore should direct OPTCL to take up the matter with Government of Odisha to fund the economically unviable projects and the other projects that are required for the larger interest of the State through grants.

**17.** OPTCL should be directed to consider the meter data to assess the month-wise transmission loss in intra-state transmission system including losses at different voltage levels (i.e. 132 kV, 220 kV and 400 kV levels).



*Jarjarg* *Salh*  
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18. The Hon'ble commission may consider our views and accordingly pass appropriate orders.

**PRAYER**

In the facts and circumstances stated above and in the interest of the parties and the larger interest of the State the Hon'ble Commission be pleased to pass appropriate orders to the effect that

1. ARR of OPTCL may be approved accordingly based on the submission made above.
2. The Transmission Charges should be limited to 17 P/Unit.
3. Transmission loss to be reduced to 2.5% for FY 2025-26.
4. Proposal of Reactive energy charges of 3 paise/KVARh should be reduced.
5. Proposal of OPTCL to levy of Grid Support Charge for connectivity may be rejected
6. Each year truing up exercise and business plan approval should be carried out by Hon'ble commission through a process of public hearing.

**Place: Bhubaneswar**

**For M/s. Visa Steel Ltd.**

**Date: 11.01.2025**

*Sanjay Desh*  
**Authorized Signatory**



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**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur  
Bhubaneswar-751021**

Case No: 93/2024

Filing No: 1

**IN THE MATTER OF:**

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**AND**

**IN THE MATTER OF:**

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022

**... Applicant**

**AND**

M/s. Visa Steel Limited, Kalinganagar Industrial Complex, At/Po- Jakhapura, Dist- Jajpur, Odisha-755026, Email: dr.dash@visasteel.com, Mobile: 9777958822

**...Respondent**

**Affidavit verifying the application**

I, Mr. Dwijaraj Dash, Son of Mr. Nrusingha Charan Dash aged about 57 years, working as General Manager, CPP of M/s. Visa Steel Limited having its plant site office at Kalinga Nagar Industrial Complex, Jakhapura-755026, Jajpur, Odisha do hereby solemnly affirm and state

s follows:-

1. That I am the Authorised person M/s. Visa Steel Limited and I am duly authorized to swear this affidavit on its behalf.

2. The statements made herein now are based on information and I believe them to be true

**THE ABOVE NAMED DEPONENT BEING IDENTIFIED BY.....  
ADV. BBSR APPEARS BEFORE ME AND STATE AN OATH ON.....  
.....AM/PM THAT THE CONTAINTS OF THIS AFFIDAVIT ARE TRUE TO THE BEST OF.....  
KNOWLEDGE**

*Dwijaraj Dash*  
**DEPONENT**

**PLACE: Bhubaneswar  
DATE: 11.01.2025**

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**P K DALABHERA  
Notary, Bhubaneswar  
Regd. No. ON-46/09**



**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur  
Bhubaneswar-751021**

**Case No: 93/2024**

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**IN THE MATTER OF:**

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**AND**

**IN THE MATTER OF:**

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022

**... Applicant**

**AND**

M/s. Visa Steel Limited, Kalinganagar Industrial Complex, At/Po- Jakhapura, Dist- Jajpur, Odisha-755026, Email: dr.dash@visasteel.com, Mobile: 9777958822

**...Respondent**

**Letter of Authorization**

I, Mr. Dwijaraj Dash, Son of Mr. Nrusingha Charan Dash aged about 57 years, working as General Manager - CPP of M/s. Visa Steel Limited hereby authorize Sri Bibhu Swain, residing at K-8-82, Kalinga Nagar, Ghatikia, Bhubaneswar-751029 to be my representative to present the above case on my behalf before the Hon'ble Odisha Electricity Regulatory Commission relating to my above reply and to submit any additional submission, memos, documents etc. as may be required and in general do all such thing as may be required in connection with the above reply.

**For M/s. Visa Steel Limited**

**Place: Bhubaneswar**

**Date: 11.01.2025**

*Dwijaraj Dash*  
**Authorized Signatory**



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**BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
PLOT NO. 4, CHUNAKOLI, SAILESHREE VIHAR,  
CHANDRASEKHARPUR, BHUBANESWAR-751021**

**CASE NO. 93/2024  
FILING NO. 3**

**IN THE MATTER OF:** (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**And**

(ii) Truing up application for the FY 2023-24 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

**AND**

**IN THE MATTER OF:** Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

..... Applicant

**vrs**

M/s. Visa Steel Limited, Kalinganagar Industrial Complex, At/Po- Jakhapura, Dist-Jajpur, Odisha-755026 and 15 others.

..... Objectors

**Rejoinder to the objections raised by the Objector M/s. Visa Steel Limited.**

**The humble applicant above named**

**MOST RESPECTFULLY SHEWETH:**

1. That, the Objector M/s. Visa Steel Limited vide affidavit dated 16.01.2025 has raised certain submissions on ARR & Transmission Tariff Application of OPTCL for FY



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*Prabir Kumar Mallick*

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2025-26 and Truing up application for FY 2023-24. In reply, OPTCL submits its rejoinder to the submissions in the following paragraphs.

**Rejoinder to Para 3 to 7:**

That, the respondent has submitted the statistical data related to the past year comparing the proposed vis-à-vis approval in respect of expenses towards human resource expenses , R&M expenses , A&G expenses, depreciation with a request to approve accordingly after due scrutiny. In this regard it is submitted that OPTCL has submitted its ARR application for FY 2025-26 as per the various provisions stipulated in OERC (Terms & Conditions for Determination of Transmission Tariff) Regulations, 2014 and directions of the Commission passed in different orders with proper justifications.

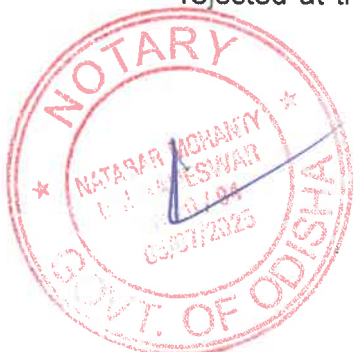
**Rejoinder to Para 8:**

**Determination of Transmission Charges:**

The Transmission infrastructures are created considering the demand and request of the DISCOMs from time to time, after due approval from the Hon'ble OERC through Transmission Plan. Being a Transmission License, OPTCL has always endeavored to create the Transmission infrastructure for providing reliable and quality power to the consumers of DISCOMs. Accordingly, every year OPTCL is adding more transmission assets to meet the requirement of DISCOMs. Transmission Charge is arrived at 36.08 paise per unit by dividing the total ARR of OPTCL with the recent realistic MU projections of DISCOMs and recovered from them on a monthly basis. This rate will decrease if DISCOMs drawal increase. Alternatively, OPTCL is proposing to recover the Transmission charges on a monthly basis, based on the recent realistic MU projections of DISCOMs, **irrespective of the drawal.**

The proposed Transmission Charge of 36.08 p/u has been derived by considering the recent realistic energy demand projections of 38764.29 MU as communicated by the DISCOMs & other LTOA customers and the ARR figures have been arrived by OPTCL justifying component wise projections as per the provisions contained in OERC Transmission Tariff Regulations, 2014, OPTCL's Audited Accounts for FY 2023-24, all relevant data/information and materials. The details of projections are submitted in page 51-52 of the present ARR application of OPTCL for FY 2025-26. Moreover, OPTCL had furnished all requisite information and details as per the prescribed formats of the Hon'ble Commission with full justifications.

Hence, mere apprehension of the respondent towards imposition of excessive burden on Discoms seems to be inappropriate and unacceptable which is likely to be rejected at this juncture. Moreover, the contention of the stake holder operating in the



*Prabbeer Kumar Mallik*

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value chain of electricity needs to appreciate the fact that the cost recovery has to be in full so as to make the sector sustainable.

Hence, OPTCL does not agree with the views of the Objector.

**Rejoinder to Para 9:**

**Transmission Loss**

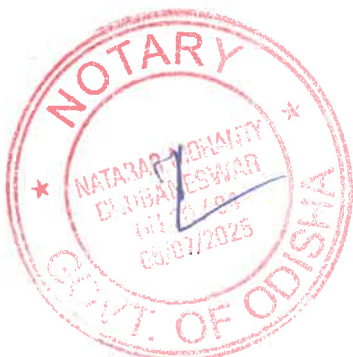
First of all, the proposal to approve transmission loss of OPTCL at 2.5% is baseless and without any study.

The actual transmission loss for the period **Apr' - Sep' 2024** is calculated to be **3.09%** as shown in the ARR & TT application for FY 2025-26 (page-229). This figure is **less than the actual** transmission loss during last year i.e. **3.11%** for **FY 2023-24**. In fact, OPTCL had projected Transmission loss of 3.05% for FY 2024-25, but Hon'ble Commission had set a target of 3.00% which could not be achieved yet.

In OPTCL system, the transmission loss is purely technical loss and a function of real time injection of power by a number of generators, system configuration and power flow requirements at different load centers. It depends on many parameters / factors such as distance and mismatch between generation and load centers, types of load, reactive power compensation, voltage profile, seasonal variation of demand load etc. Thus, OPTCL does not have much control over the same at any point of time. The transmission system of OPTCL operates as an integral part of the Eastern Region Grid to serve the internal demand of the State as well as to carry out import and export of power depending upon the system demand.

As of the matter of fact, some grid s/s and lines are being constructed in many remote and deprived areas funded under Central & State Govt. schemes in the interest of public. Additional length in EHT lines and Sub-stations in under-loaded areas are also responsible for increase in transmission loss.

The Transmission Loss in OPTCL network is in a gradually reducing trend over the years i.e. from 3.73% during 2014-15 to 3.11% in 2023-24 and has remained 3.09% within 1<sup>st</sup> six months of FY 2024-25 mainly due to addition of infrastructure and various system strengthening works taken up by OPTCL. The actual losses incurred over the years by OPTCL have been within the margin allowed by Hon'ble Commission up to the year FY 2017-18. However in FY 2018-19, the commission set the loss at 3.00% though the projected transmission loss was at 3.25% and thereafter the commission has been pegging the transmission loss at the same level though loss projected by OPTCL remained in a downward trend.



Year	Tr. Loss proposed	OERC Approval	Actual
2014-15	3.75%	3.75%	3.73%
2015-16	3.75%	3.75%	3.67%
2016-17	3.70%	3.70%	3.58%
2017-18	3.50%	3.50%	3.34%
2018-19	3.25%	3.00%	3.28%
2019-20	3.25%	3.00%	3.25%
2020-21	3.20 %	3.00%	3.22%
2021-22	3.15%	3.00%	3.18%
2022-23	3.10%	3.00%	3.15%
2023-24	3.10%	3.00%	3.11%
2024-25	3.05%	3.00%	3.09% (1 <sup>st</sup> six months )

From the table given above, it is also clear that each year upto FY 2017-18, the transmission loss achieved by OPTCL has remained at a level lower than the approved figures by Hon'ble commission and from FY 2018-19 the target set by OERC appears to be very stiff which was hard to achieve though **the trend of lesser transmission loss year after year has been achieved.**

That the transmission losses depend upon the voltage level at which the power is transmitted. The transmission losses are higher where the percentage of lower voltage (132kV or below) transmission system is higher. A comparison of the average transmission losses of a few state transmission licensees and their corresponding transmission assets at low voltage level (132 kV) is shown below.

**TRANSMISSION LOSS (%) OF OTHER STATES OF LOW VOLTAGE LINES  
UPTO 132KV FOR FY 2023-24**

States	% of Low voltage Lines (up to 132 kV)			Actual Transmission Losses for FY 2023-24 (%)
	Transmission Lines up to 132kV (Ckm)	Total Transmission Lines (Ckm)	% of Transmission Lines up to 132kV	
Odisha (OPTCL)	8479.831	16508.068	51.36%	3.11
Uttar Pradesh (UPPTCL)	28733	60145	47.77%	3.22
Gujarat (GETCO)	44512	73054	60.93%	3.83

It may be kindly be appreciated that the transmission loss (technical) is bound to happen as per law of physics and is very difficult to reduce after a certain level. Also, at all India level, the transmission loss of utilities have remained at more than 3.00% and



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to suffice our view point the table is given below for kind appreciation of Hon'ble Commission.

**Transmission loss of Different states for FY 2023-24**

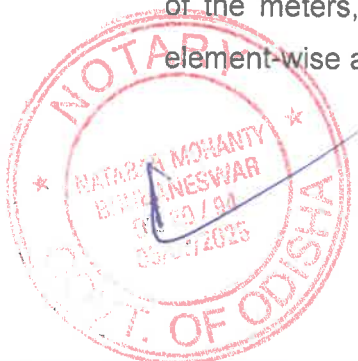
Name of states	Tr. loss approved by State Commission	Actual Tr. loss
Uttar Pradesh (UPPTCL)	3.22%(UERC)	3.22%
Gujarat (GETCO)	3.60% (GERC)	3.83%
Assam (AEGCL)	3.30%(AERC)	3.30%
Rajasthan (RVPN)	4.50%(RERC)	4.23%
Himachal Pradesh (HPPTCL)	3.19% (HERC)	3.25%

All India average transmission loss for the period 06-01-2025 to 12-01-2025 as published by Grid Controller Of India Limited, National Load Despatch Centre dated 18.01.2025 is 4.00 %. Further, as per the CEA General Review 2024 (Containing Data for the Year 2022-23) the transmission loss of Eastern Region is 3.37% (attached as **Annexure-01**). Present transmission loss level of OPTCL is much less than both the said cases (i.e. Grid Controller Of India Limited & CEA General Review 2024).

However, as a responsible Transmission utility, OPTCL is making an all-out effort to reduce the transmission loss further by undertaking various **system operation and loss reduction measures** by implementing the emerging technologies like **system Automation**, load bifurcation, **modification in system configuration**, procurement of more efficient equipment, **Digitalization of grids** by using SAS, Protection system improvement using Busbar protection and Event Logger, **Conversion of Radial to Ring system**, Advanced Metering Infrastructure etc. to bring it to **3.05% by FY 2025-26**.

**Steps taken for Energy Audit**

Around 2600 nos. of 0.2s Accuracy Class ABT Energy meters are required for different metering points at all Grid Substations of OPTCL for billing and audit purposes. 538 nos. of meters have been installed by OPTCL at different metering points. 2000 nos. energy meters will be installed at different Grid Substations under SAMAST Project, out of which 70 nos. meters have been installed and the installation process of balance meters are in progress. The installation of energy meters for balance metering points under **SAMAST** Project will be completed by 31st October 2025. After installation of the meters, energy audit and calculation of transmission losses of OPTCL on an element-wise at different voltage levels will be feasible.



**Rejoinder to Para 10:**

**Open Access Charges:**

That the system peak demand of 6927.78 was touched on dated.19.10.2024. Statement on the loading pattern of the existing transmission system (400kV, 220kV, 132kV power transformers and EHT lines) corresponding to the peak demands is attached as **Annexure-02**. OPTCL has already conducted load flow study considering different load scenario i.e Summer peak, Winter lean, High hydro, Low Hydro & Solar Peak, in the Revised 14<sup>th</sup> Intra-state Transmission Plan of Odisha for FY 2022-23 to FY 2026-27, which has been approved by Hon'ble Commission vide case no. 08/2024. In the aforesaid report percentage loading of all Transmission line, ICT, Auto & Power Transformers till FY 2026-27 have been mentioned. The Transmission infrastructures are created considering the demand and request of the DISCOMs from time to time, after due approval from the Hon'ble OERC through Transmission Plan and the DISCOMs and other LTOA customers are responsible to bear the full approved ARR of OPTCL. STOA charges is being charged as per the Open Access Regulations, 2020.

**Rejoinder to Para 11:**

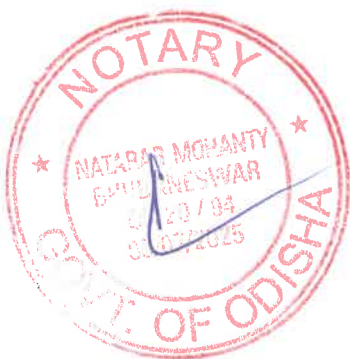
**Reactive Energy Charges:**

As per Regulation 31(1) under Chapter-7 (IMBALANCE AND REACTIVE ENERGY CHARGES) of the OERC (Terms and Conditions of Intra-State Open Access) Regulations, 2020, payment for the reactive energy charges by open access consumers shall be in accordance with provisions stipulated in the State Grid Code or as may be specified in relevant regulations/orders of the Hon'ble Commission .

The Hon'ble Commission in Para 16 (page 5) of the order dated 05.02.2019 in Case No. 50/2017 has inter alia viewed that the provisional reactive energy charges of 3 paise/KVARh as allowed in the ARR order of OPTCL for FY 2018-19 continue for time being till a final justification is submitted by OPTCL in consultation with the stakeholders. However, OPTCL **has not realized any revenue** from Reactive Energy Charges so far.

In view of the above, OPTCL proposes that 3paise/KVARh may be approved provisionally as Reactive Energy Charges for FY 2025-26.

Hence, rejection of the proposal of OPTCL with regard to Reactive Energy Charges as suggested by the Objector is not just and proper.





**Rejoinder to Para 12:**

**Levy of Grid Support Charge for connectivity:**

The benefits derived by the CGPs with co-located loads are enormous. The benefits are in the nature of ancillary services which are not paid till now. The Grid support charges (GSC)/Parallel operation charge has been levied by different state Regulatory Commissions and upheld by APTEL and Supreme Court of India through various orders and hence proposed by OPTCL through a separate petition. Recently, OPTCL had filed an application (case No. 44 of 2024) on 26.06.2024 for determination and approval for levy of Grid Support Charges for industries having Captive Generating / Cogeneration plants and running in parallel with the Grids of OPTCL. Hon'ble Commission in its order directed OPTCL to submit a consolidated report considering the observations/queries raised by the stakeholders in the earlier Cases filed by OPTCL. In compliance to above, OPTCL is in final stage of preparation of the required consolidated report and will be submitted before Hon'ble Commission shortly.

**Rejoinder to Para 13 & 14:**

To prevent overloading, regular system study has been carried out and augmented the network capacity as when required. Priority has been given to use of under loaded network. As directed by Commission regular meeting has been conducted with DISCOMs for creation of downstream infrastructure for optimum utilization transmission networks.

**Rejoinder to Para 15:**

OPTCL always executes its projects which are either approved in Business Plan of OPTCL or Intra State Transmission Plan. As per the license conditions, OPTCL is mandated to take prior approval of Hon'ble Commission for any transmission projects above Rs. 10 Cr. which OPTCL has been following scrupulously.

**Rejoinder to Para 16:**

Since the creation of a transmission infrastructure requires huge investments, OPTCL always request state Government for financial support. State Govt. has been contributing 100% financial assistance in shape of grant/equity in case of non-remunerative and contributing 30% equity support in case of remunerative projects.

2. The objections not specifically admitted may be deemed to have been denied.

**PRAYER**

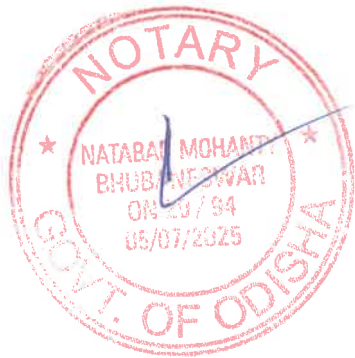
In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of M/s. Visa Steel Limited while



approving ARR and Transmission Tariff of OPTCL for FY 2025-26 & Truing up application for the FY 2023-24.

Bhubaneswar  
January 31, 2025

By the Applicant  
Through  
*Prabeer Kumar Mallick*  
Sr. GM (El.), RT&C



Annexure-01

**Table 6.2**  
**Regional Transmission Losses**  
**Utilities**  
**2022-23**

Region	Energy Available in the Region (GWh)	Export to other Region (GWh)	Export to Nepal (GWh)	Export to Bangladesh (GWh)	Export to Bhutan (GWh)	Export to Myanmar (GWh)	Total Energy drawal by States/Utilities (GWh)	Transmission Losses (GWh)	Transmission Losses (%)
1	2	3	4	5	6	7	8	9 (2-3-4-5-6-7)	10((8/2)x100)
Northern Region	235784.74	3399.70	343.64	0.00	0.00	0.00	224171.69	7869.71	3.34
Western Region	282367.53	57344.05	0.00	741.34	0.00	0.00	215219.30	9062.84	3.21
Southern Region	173393.55	7625.46	0.00	3491.13	0.00	0.00	156314.82	5962.13	3.44
Eastern Region	134352.68	57191.16	314.03	7547.70	266.30	0.00	64506.41	4527.08	3.37
North Eastern Region	21117.54	4662.00	0.00	1039.50	38.47	9.81	14499.49	868.27	4.11

Loading pattern corresponding to the peak demand of 6928 MW (including Vedanta drawal) on 19-JUNE-2024 AT 16:00 hrs			
FEEDER NAME	MW	Rated Capacity in MW	% Loading
400KV MENDHASAL - PANDIAVAL2	50.43		
400KV MERAMUNDALI-BOL_PG	0.00		
400KV MERAMUNDALI-KANIHA1	-637.76		
400KV MERAMUNDALI-KANIHA2	-385.39		
400KV INDRAVATI ICT1	-67.47		
400KV INDRAVATI ICT2	-66.91		
400KV MERAMUNDALI-BOL_PG	0.00		
400KV DUBNW- KALABADIA	-368.96		
400KV_OPGC-JHARS_PG - 1	230.36		
400KV_OPGC-JHARS_PG - 2	150.50		
MENDHASAL -PANDIAVIL 1	49.34		
DUBNW- PANDIAVAL	75.67		
VEDANTA-JHARSUGUDA1 PG	-40.51		
VEDANTA-JHARSUGUDA2 PG	-40.23		
220KV JODA-JAMSHEDPUR	5.54	192	3%
220KV JODA-RAMCHANDRAPUR	-156.72	192	86%
KATAPALLI2-BOLAN PG	0.00	192	0%
SADEIPALLI2-BOLAN PG	-127.65	192	70%
220KV RENGALI-RENGALI PG 1	24.96	192	14%
220KV RENGALI-RENGALI PG 2	9.33	192	5%
220KV RENGALI-KANIHA	-132.61	192	73%
220KV TTPS-KANIHA	136.08	192	75%
220KV MERAMUNDALI-KANIHA 1	-107.71	192	59%
220KV MERAMUNDALI-KANIHA 2	-103.58	192	57%
220KV JAYANAGAR-JEPORE PG 1	-22.71	192	12%
220KV JAYANAGAR-JEPORE PG 2	-23.86	192	13%
220KV BUDHIPADAR-KORBA 1	-4.14	192	2%
220KV BUDHIPADAR-KORBA 2	-2.92	192	2%
220KV BUDHIPADAR-KORBA 3		192	0%
220KV TARKERA-BISRA 1	-201.68	350	61%
220KV TARKERA-BISRA 2	-205.17	350	62%
132KV KALABADIA-BANGIRIPOSI	62.92	76	87%
132KV KALABADIA-BARIPADA	66.95	76	93%
220KV KALABADIA-BALASORE 1	176.81	192	97%
220KV KALABADIA-BALASORE 2	177.28	192	97%
NET - KALABADIA DRAWL	-916.91		
ATRI_AUTO-1	98.39	160	65%
ATRI_AUTO-2	98.61	160	65%
BALAS AUTO1	-77.17	160	51%
BALAS AUTO2	-76.75	160	50%
BALAS_AUTO-3	-76.34	160	50%
BHADR AUTO1	0.00	100	0%
BHADR AUTO2	91.01	160	60%
BHADR_AUTO-3	91.84	160	60%

BHANJ AUTO1	53.54	160	35%
BHANJ AUTO2	47.17	160	31%
BIDAN AUTO1	-54.85	100	58%
BIDAN AUTO2	0.00	100	0%
BIDAN AUTO3	23.75	160	16%
BOLNW AUTO1	67.28	160	44%
BOLNW AUTO2	70.89	160	47%
BOLNW_AUTO-3	66.65	160	44%
BUDHI AUTO1	92.49	160	61%
BUDHI AUTO2	52.98	160	35%
BURLA AUTO1	35.41	100	37%
BURLA AUTO2	35.34	100	37%
BURLA_AUTO-3	53.04	160	35%
CHAND AUTO1	56.32	100	59%
CHAND AUTO2	97.51	160	64%
CHAND AUTO3	60.82	100	64%
CHAND AUTO4	94.03	160	62%
DUBURI AUTO1	58.66	160	39%
DUBURI AUTO2	56.70	160	37%
DUBURI AUTO3	37.08	100	39%
GODA_AUTO-1	30.13	160	20%
GODA_AUTO-2	30.47	160	20%
JAYAN AUTO1	47.72	160	31%
JAYAN AUTO2	40.76	160	27%
JODA AUTO1	64.76	160	43%
JODA AUTO2	65.89	160	43%
JODA AUTO3	53.73	100	57%
LAPAN_AUTO-1	81.15	160	53%
LAPAN_AUTO-2	81.07	160	53%
MERAM AUTO1	39.55	100	42%
MERAM AUTO2	38.57	100	41%
MERAM AUTO3	37.43	100	39%
NAREN AUTO1	0.00	160	0%
NAREN AUTO2	0.00	160	0%
NAREN AUTO3	0.00	100	0%
PARAD AUTO1	-46.12	100	49%
NAYAG POWXFMR1	22.55		
NAYAG POWXFMR2	13.44		
NAYAG POWXFMR3	-22.16		
TATAPOWER1	-4.60		
TATAPOWER2	-2.02		
VAL DRAWAL	-959.45		
VEDANTA IPP	499.41	600	88%
ATRI-PANDIAVIL-1	-107.98	192	59%
BHOGRAI-KUCHEI	-29.34	76	41%
JALESWAR-KUCHEI	-40.58	76	56%
ADITYA_LOAD	0.00		
INFA-THERU	37.25	76	52%
ATRI-PANDIAVIL-2	-108.85	192	60%
220KV_KJHAR_GR -KEONJ_PG - 1	-11.58		

220KV_KJHAR_GR -KEONJ_PG - 2	-11.75		
LAXMIPUR_POWER TRANSFORMER	2.97	20	16%
PARAD AUTO2	-74.20	160	49%
PARAD AUTO3	-67.87	160	45%
TARKE AUTO1	50.91	100	54%
TARKE AUTO2	52.13	100	55%
TARKE AUTO3	51.04	100	54%
TARKE AUTO4	0.00	100	0%
THERU AUTO1	-22.22	100	23%
THERU AUTO2	21.45	100	23%
TTPS AUTO1	411.78		
TTPS AUTO2	0.00		
BOLNW_BOLAN_PG-2	-127.65	192	70%
132 KV ANAND_BAITARANI PWR	-0.03		
220 KV_ NAREN_TATA GOPALPUR FDR-1	0.00	192	0%
220 KV_ NAREN_TATA GOPALPUR FDR-1	3.32	192	2%
220 KV_ JAYAN_JEYPO FDR-3	-20.90	192	11%
220 KV_ JAYAN_JEYPO FDR-4	-23.87	192	13%
KESINGA - BOLANGIR PG	-60.98	192	33%
PRATAPSASAN-PANDIAVIL - 1	-111.61	192	61%
PRATAPSASAN-PANDIAVIL - 2	-111.83	192	61%
220 BUDHIPADAR - SMC 1	-13.22	192	7%
132 LAPAN - SMC	21.64	76	30%
132KV JODA-KENDUPOSI	22.42	76	31%

315

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
AT- PLOT NO.-4, CHUNOKOLI, SHAILASHREE VIHAR, BHUBANESWAR-21.

CASE NO:- 93/2024

FILING NO:- 01

IN THE MATTER OF:

Application filed by M/s Odisha Power Transmission Corporation Ltd (OPTCL) under Section 64(2) of the Electricity Act, 2003 for approval of Annual Revenue Requirement (ARR) & Determination of Transmission Tariff for the FY26 & Truing up Petition for FY24 in terms of Sections 62, 64 and 86 of the Electricity Act, 2003 read with OERC (Conduct of Business) Regulations-2004 and OERC (Terms & Conditions for Determination of Transmission Tariff) Regulations, 2014, duly registered in OERC Case No. 93/2024.

AND

IN THE MATTER OF:

MD, OPTCL Ltd, Janapath, Bhubaneswar-751022.....Petitioner

Vrs.

SHRI ANANDA KUMAR MOHAPATRA, Freelance Power Analyst, aged about 56 years, S/o Late Jachindra Nath Mohapatra, Plot No.- 799/4, Kotiteertha Lane, Old Town, BBSR-02, [anandamohapatra22@gmail.com](mailto:anandamohapatra22@gmail.com) .....Respondent

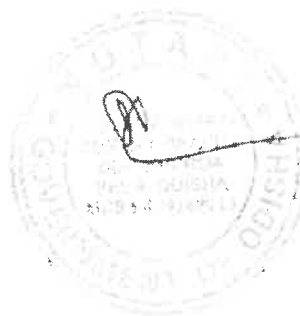
AFFIDAVIT

I, SHRI ANANDA KUMAR MOHAPATRA, S/o Late Jachindra Nath Mohapatra, Plot No.- 799/4, Kotiteertha Lane, Old Town, BBSR-02 do hereby solemnly affirm and state as follows:

1. That I am the Freelance Power Analyst of the State of Odisha & the Respondent in the above matter Case No. 93 of 2024.
2. That the facts stated above are true to the best of my knowledge.

IDENTIFIED BY  
Identified by  
ADVOCATE

Advocate  
Place: Bhubaneswar  
Date: 16.01.2025



Ananda Kumar Mohapatra  
DEPONENT

16-01-2025

**BEFORE ODISHA ELECTRICITY REGULATORY COMMISSION  
AT- PLOT NO-4, CHUNOKOLI, SHAILASHREE VIHAR, BHUBANESWAR-21.**

**CASE NO:- 93 of 2024**

**FILING NO:-1**

**IN THE MATTER OF:**

The Electricity Act-2003 & the Rules, Regulations, Codes, Plans & Policies notified there under.

**AND**

**IN THE MATTER OF:**

Application filed by M/s Odisha Power Transmission Corporation Ltd (OPTCL) under Section 64(2) of the Electricity Act, 2003 for approval of Annual Revenue Requirement (ARR) & Determination of Transmission Tariff for the FY26 & Truing up Petition for FY24 in terms of Sections 62, 64 and 86 of the Electricity Act, 2003 read with OERC (Conduct of Business) Regulations-2004 and OERC (Terms & Conditions for Determination of Transmission Tariff) Regulations, 2014, duly registered in OERC Case No. 93/2024.

**AND**

**IN THE MATTER OF:**

E-filing of Public Comments as called for in the Public Notice dt. 13.12.2024 by OERC as per section 64(2) of the Electricity Act' 2003 and relevant provisions of the OERC (Conduct of Business) Regulations-2004 for consideration by Ld Commission.

**AND**

**IN THE MATTER OF:**

**Managing Director, OPTCL Ltd, Janapath, BBSR-751022 .....Applicant**

**Vrs.**

**SHRI ANANDA KUMAR MOHAPATRA, Freelance Power Analyst, aged about 56 years, S/o Late Jachindra Nath Mohapatra, Plot No.- 799/4, Kotiteertha Lane, Old Town, BBSR-751002, Email:- [anandamohapatra22@gmail.com](mailto:anandamohapatra22@gmail.com)**

**.....Respondent**



*Power Analyst*  
Odisha



## Most Respectfully SHEWETH:

During the last Tariff proceedings for FY25, we have raised the issue of e-filing of tariff documents by the Stakeholders and urged upon Ld Commission to implement it. We have cited the e-filing of cases done at the registrar of Hon'ble APTEL, High Court and Supreme Court of India. Hon'ble Member & I/c Chairman Shri Gajendra Mohapatra considered our suggestion and accordingly directed the Secretary, OERC to implement e-filing. Therefore, in view of the above direction of OERC, I do file herewith objections & suggestions through electronic mode (e-mail) for the consideration by Ld Commission.

1. **Timelines:** Timeliness in power sector is very crucial as it ensures the tasks of notifying specified regulations, forecasting demand & supply, R&M works, plans and projects are completed within the deadlines, maintaining operational flow and meeting the objectives stipulated in the Electricity Act. Timelines fosters the cost effectiveness, reasonable tariff and so also customer satisfaction by delivering the services on time. It is ultimately leading to a positive reputation of regulatory regime of electricity and increased customer trust; essentially, being timely demonstrates the professionalism and respect for Utilities, Clients and Consumers.

1.1 **Timeline failure cases:** Timelines are required to be ensured to upkeep the pace of growth because without timelines, the performance of the Applicant & Regulatory body cannot be improved. Though the timelines desired under various provisions of the Act are grossly violated by all concerned including the Regulator and the Applicant, but nothing remedial measures are taken so far to ensure it. Ld OERC, the Regulatory body fails to notify required regulations on timelines. Forecasting of demand & supply of power in the State has been irregular, Business plan or MYT of the Utilities including the Applicant is not approved as per the timelines; the Utility fails to complete the projects on timelines; replacement of defective transformers, meters and electrical plants & machinery are not done as per the regulated timelines; restoration of power supply and the quality of various services & automatic compensation for failure of service have not been ensured within timelines as specified in the Act and Regulations. Therefore, it is urged upon the Commission to pay strict attention over the timelines specified in the Act, Policies, Codes, Rules and Regulations and to ensure it so that the public & private bodies of State electricity including the regulatory body OERC could perform the work within timelines to the satisfaction of stakeholders and to meet the objectives of the Act.



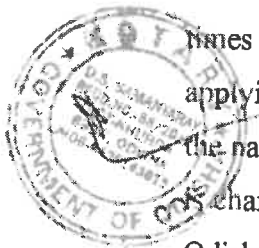
Power Analyst  
Orissa

1.2 **Directives of the Act:** That the regulation no. 3.1 of OERC (Terms & Conditions for Determination of Transmission Tariff) Regulations, 2014 states that the commission shall be guided by the nine principles as laid down in Section 61(a) to 61(i) of the Act while determining Transmission Tariff. But sorry to state that even after completion of 22 years of enactment of the Electricity Act'2003, the principles laid down in Section 61(a) & Section 61(f) are not followed by the state regulatory body in notifying regulations & tariff orders within the timeline. The Central Commission, CERC is regularly revising and amending the regulations for determination of transmission tariff of the inter-State Transmission Licensees since the FY14. If we study & compare the principles followed by Central Commission, CERC for determination of transmission tariff with the principles followed State Commission, OERC, then yours lord will find huge gaps in between. Odisha Commission is following Postage Stamp Method whereas Central Commission is following POC (Point of Connection) Method. The POC Method is very much accurate & scientific because it ensures recovery of every rupee spent by the Transmission Licensee and gives justice to the Beneficiaries by charging fair tariff at the point of connection. POC Method considers the actual cost of the specific grid sub-station & its associated bays at the point of connection of the Beneficiary. But the Postage Stamp Method is primitive because it neither ensures recovery of every rupee nor gives justice to the Beneficiaries. The Beneficiaries pay more tariff than the real cost of the service provided by the Transmission Licensee in the Postage Stamp Method. This primitive method of transmission pricing exploits & rewards to the groups of Beneficiary depending upon their birth land or say point of connection. This is undemocratic & injustice indeed. Though this matter is taken to the notice of the Commission in previous years, the regulatory body has not paid due heed and trying to escape from its duties and responsibilities. As a result, the Applicant is losing huge source of revenue and the Beneficiaries depending upon his point of connection are paying more than the real cost of service at that point of connection. The Applicant has restructured the grid management to suit the change of tariff from postage stamp to POC since last several years but regulatory body does not pay due attention. This is nothing but failure of timeline of the state regulatory body. Therefore, I may urge upon the Learned Commission to scrap out the TT Regulations, 2014 and initiate immediate necessary action to make new TT Regulations, 2025 in place effective from 01.04.2024 as per the POC mechanism applied by Ld CERC since long. By doing so, I must say the State Commission honours Central Commission as per the obligation mentioned in Section 61(a) of the Act.



Power Analyst  
Office

1.3 **Observation of OERC is ridiculous:** For last several years, we have been strongly objecting to the failure of tariff mechanism contemplated in Section 61(f) of the Act. The Act says, the tariff mechanism applied for tariff determination must not be limited to three years as applied by OERC (which can be verified from last 15 years tariff orders). OERC is determining tariff considering only three years, such as previous year, current year and ensuing year. Nothing more named year like base year & other three years are found in OERC Tariff Orders. The principles of multiyear tariff (MYT) mechanism contemplated in Section 61(f) of the Act direct the regulatory commission to consider seven years in the proceeding to approve each element of the revenue requirement filed by the Licensees & Generating Companies. I must say how are. The MYT period is five years period, the tariff policy speaks. The balances two years are the years preceding to the base year of MYT period. It is well noted in the tariff regulations that the accounts of the Licensees/Companies for the two years preceding to the base year of MYT period will be verified to approve each element of revenue requirement for each year of the block period (five years) to issue MYT Order. While the Licensee/Company files application to revise tariff, the commission starts to review seven years data before rejecting/accepting the Application. In Odisha electricity, the MYT has been reflected in the tariff regulations because the concept like Business Plan for block period of five years is well described. Tariff Regulations in Odisha is ok wrt MYT mechanism but it is never applied since FY09. I must clarify that since FY09, nothing tariff order of OERC considers element wise cost & revenue data for at least five years in the orders to revise tariff. Therefore, the approved projections in Business Plan and its references are not given anywhere to approve any component of cost, revenue and capital of ARR in the tariff orders issued by OERC since FY09. So the State regulatory body & the licensees have grossly failed to apply MYT mechanism in the proceeding to determine tariff year after year. Time passed on & rectification was not done. This issue was taken to the notice of the Commission several times in past years but the Commission is repeatedly observing in tariff orders that they are applying MYT mechanism in the approval of ARR and revising tariff. That is why I make the narrative "Observation of OERC is ridiculous". Is not it ridiculous? The rule of Odisha has changed in the meantime & new Govt led by Bharatiya Janata Party (BJP) starts to rule Odisha since June last year. In the domain of changed rules, I am hopeful for certain changes in the tariff mechanism applied in Odisha.



Power Analyst  
Odisha

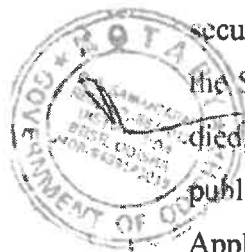
1.4 The Applicant files the instant Petition as per Regulation no. 5(2) of OERC (Terms & Conditions for Determination of Tariff) Regulations, 2014 without carrying the regulation no.4 titled Business Plan. In the instant application the Licensee does not say anything for the Business Plan for the 3<sup>rd</sup> Control period FY25 to FY29. I must cite herewith the observation of Ld OERC at Para no. 153 of current year tariff order for FY25 in the case no. 113/2023. OERC says in the above para that *“the 1st Control Period is from 1st April 2014 to 31<sup>st</sup> March, 2019. After the expiry of 1st control period in the year 2019, the Commission had allowed OPTCL to submit their Business Plan for 2nd control period which the Commission defined as a period starting from 01.04.2019 to 31.03.2024. Accordingly, OPTCL had submitted its Business Plan for the 2nd control period which has been approved by the Commission in their order in Case No. 63/2020 dated 03.11.2021.”* The fact is that the 2<sup>nd</sup> control period of Business plan for five years, i.e. FY20 to FY24 and begins on dt. 01.04.2019. To meet the objectives of MYT mechanism, the Business plan of the Applicant should be approved well in advance before 30<sup>th</sup> Nov’2018, so it enables the Applicant to file ARR & TT application for the base year FY20 factoring the approved planned figure for FY20. But this has not been done by OERC. OERC asked the applicant to file Business plan for 2<sup>nd</sup> control period on dt. 19.07.2019. That after expiry of 3 months of the base year of 2<sup>nd</sup> control period, OERC asked the Applicant to file Business Plan and by that time OERC had already approved tariff for the base year. After the approval of tariff for the base year FY20, the business approved latter for the base year has no meaning. So the base year tariff was determined without MYT so also Business plan. The tariff for the 2<sup>nd</sup> year of the control period, i.e. FY21, was approved without any valid business plan. There was no valid business plan in hand while the Applicant filed the Tariff Petition for 3<sup>rd</sup> year FY22 of the control period. So the TT has been determined by OERC without valid business plan for the first three years of 2<sup>nd</sup> control period. Lastly, OERC approved business plan for 2<sup>nd</sup> control period vide order dated 03.11.2021 in case no 63/2020 while tariff has already been determined for first three years of business plan. So, question arises what is the usefulness of business plan or MYT Order if it is approved after the determination of tariff for first three years out of five years? Simple answer is nothing usefulness. The surprising fact is that the Applicant filed the application for determination of tariff for the remaining two years of the control period (FY23 & FY24) without referring the approved figures of business plan. The Licensee and the statutory body very well know that the Business plan and MYT has nothing utility in determining tariff and this is established from the TT order issued for

FY23 & FY24 because there is no reference of approved figures of business plan in the tariff orders. Is not it ridiculous?

1.5 In the above para OERC further states that the TT Regulations, 2014 of the Commission will remain in force until it is specifically repealed by the Commission and the Regulations empower the Commission to define control periods from time to time. The 2<sup>nd</sup> control period ended by FY24 after which 3<sup>rd</sup> Control period begins by FY25 and ends with FY29 whereas the Commission says to define the control periods from time to time. May I know, could the Commission extend the control period beyond five years? If yes, then which provision of the Act, Policy or Plan empowers the Commission to do so? The Applicant and the Commission need to address the issue in public interest and to make tariff affordable.

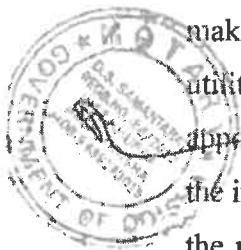
1.6 The most surprising fact is that the validity of TT Regulations, 2014 extends till which year is not known to anybody because neither 3<sup>rd</sup> control period is defined nor the business plan is approved. As a matter of practice, while time arrived, the Applicant filed ARR & TT application for FY25 & FY26 without the definition of 3<sup>rd</sup> Control period and valid business plan. The Commission has already approved ARR & TT for FY25 without valid business plan and for FY26, the Applicant files ARR TT application in the instant proceeding which I am objecting herewith. So I conclude, there is no wrong to say that the observation of the Commission on MYT is ridiculous.

2. **Public Capital dies in Tariff determination.** That the Applicant is a wholly owned Govt body alias public body like other Applicants OHPC, OPGC & GRIDCO. It is the sole responsibility Govt of Odisha and the public body like the Applicant to ensure the security of the public capital deployed in the sector and to utilise the same in the interest of the State but without making losses. Public capital neither dies nor making losses. if it is died, then there is no democratic rule. So it is the duty & responsibility of the Govt and its public bodies to act to secure public capital. But in reality, the Govt Bodies including the Applicant and the Govt of Odisha JVs like TATA DISCOMs have grossly failed to ensure the security of the public capital received from both Union and State Govt & plough back funds of public bodies. The plough back funds generated by all the public bodies or semi-public bodies are public capital in view of the laws of our land. The Assembly reply given by Govt of Odisha on disbursement of public capital to the public bodies under



consideration speaks that, more than Rs. 30000 Crores (Thirty Thousand Crores) has been disbursed to them by both Union Govt & State Govt since the commencement of reforms in the year 1995 but the aforesaid public bodies have failed to secure the public capital in their books of account, Balance Sheet. If we consolidate the Balance Sheets of all the public bodies for the purpose of verification of live public capital then we will hardly find only Rs. 5000 Crores (Five Thousand Crores). That means the balance public capital worth Rs. 25000 Crore dies in the books of account of public bodies. Therefore, I say public capital has been unsecured in the proceeding to determine the tariff proposed by the public bodies. The surprising fact is that the Regulatory Body of the Public Bodies has tolerated the death of public capital while approved tariff, resulted one Crore Odisha Consumers paid & paying higher energy bills above & over the national average as per the PFC Report discussed in Odisha media during last general election. Therefore, I do urge upon the Commission to initiate necessary measures to make all the public capital alive since 01.04.1995 in the regulatory tariff and in the books of accounts of the public bodies.

- 2.1 **Public Capital does not make any return:** The Govt grants through budget disbursed to Public Utilities & the plough back funds of the Public Utilities utilised for the purpose of capital works or equity induction is called public capital. In true sense, the Public capital is the capital paid by me as well as by the people vide taxes, duties, fees, charges etc to Govt & public bodies. Govt & Public Utilities/bodies are not formed for profit making whereas they utilise the public capital for the welfare of the people without causing any loss to people. The public utilities/bodies namely the Applicant OPTCL, OHPC, OPGC and GRIDCO are all the branches of Govt. They collect revenue directly & indirectly from people through various means as said before and spend the same without making any losses. The Chairman, MD, Directors and Employees of the aforesaid public utilities/bodies are not the owner of the bodies but they are called public servants appointed by Govt. They are to function within the rules and policies notified by Govt in the interest of public without causing any loss. Public capital that is my capital or capital of the people is granted/sanctioned by Govt in favour of the utilities with the objective of making power supply reliable and tariff affordable so that the pace of economic development of the State could be improved. Therefore, the Act, Policies, Rules & Regulations notified by the Govt and Govt bodies like Regulatory Commission do not allow the Govt Bodies to make return out of public capital. Yes, I do agree the return on private capital must be paid to private bodies. That is why the depreciation on the Assets



created out of public capital is not chargeable to tariff because public cannot pay return for their own capital. Wherever the public capital is deployed, that is not eligible to make return out of it. This is the thumb rule of a welfare State. If this is the fact, then how the OERC could approve Return on Equity on public capital deployed by public utilities and charged the same to tariff, thereby recovered from people? This is grossly illegal act; need to stop as early as possible. Public capital to be lived in books of the regulatory accounts, without which the tariff can neither be affordable nor the service be reliable.

**2.2 Public Servants do not pay public capital but people pays:** The Equity Capital of the Public Utilities/Bodies like OHPC, OPGC, OPTCL & GRIDCO is not paid by the Public Servants as stated before, rather the same is paid by the people or by the private bodies. Generally, the equity capital of the public utilities is public capital & it is deployed for the welfare of the People. While the public fails to pay the required capital for the successful formation & operation of the public utilities in public interest, Govt knocks the door of Private or Banking Bodies to float adequate private capital through loans for the purpose. Moreover, 30% of the total private capital brought up by the public utilities is eligible for return, so it is booked to equity. The public bodies including the regulatory body do not make return out of public capital as per the law of the land. This good governance model was very much visible during the initial period of regulatory regime of electricity in Odisha. But after the breakup year 2009, the above good model started to deplete. The power governance now reached at such a worst point while public bodies don't know the difference between public capital and private capital. For last several years, the public bodies like OHPC, OPTCL, OPGC and GRIDCO are making returns out of the public capital (Equity) by charging the same to tariff under the approval of regulatory body. Therefore, I urge upon Ld OERC & Dept of Energy, Govt of Odisha to intervene into the matter of grave concern and pass out necessary orders to stop making return out of public capital and recover the public capital which dies in the accounts of regulatory & public bodies.

**2.3 Difference between Public Capital & Private Capital:** Differentiating public capital from private capital has now become a difficult task for public servants because in the meantime they have forgotten the usefulness of public capital. We may kindly note that, there is no rule enacted so far by the federal Govt India or State Govt of Odisha to make return out of public capital. However, private capital floated through loans makes

return and for which those are eligible to get return on equity or payment of interest. Forgetting public capital means the Public Servants make the Govt a Private Company. Therefore, I urge upon Ld OERC & Govt of Odisha to look into the matter of grave concern and initiate remedial measures to impart necessary education in the minds of public servants so that they would be able to distinguish public capital from private capital. Sooner the cure better for the economy.

3. **Truing up for previous FY24:** That the Applicant submits the audited accounts for the year ending FY24 at Annexure-6 of the instant petition. The audited accounts shows that revenue from operation is Rs. 1048.92 Cr and other income is Rs. 249.97 Cr, thereby the total revenue received stands at Rs. 1298.89 Cr by the end of FY24. The total expenses for the corresponding period is determined at Rs. 1225.86, thereby leaving surplus revenue of Rs. 73.03 Cr before tax by the end of FY24. The current tax (MAT) paid by the Applicant is Rs. 11.29 Cr & a sum of Rs. 5.65 Cr is paid for previous years. So the total tax paid during current year is determined by the Auditor is Rs. 16.94 Cr. The Profit after tax is determined at Rs. 56.09 Cr. The audited accounts of the Applicant shows that they have run the public body without making losses during previous year. But the deferred tax adjustment of Rs. 234.65 Cr and the tax due for other comprehensive income of Rs. 6.76 Cr considered by the Auditor in the P&L Account caused loss to the financial position of the Applicant. The notes of accounts appended the auditor report marks the details of provisions for deferred tax which could be suitable addressed by the Learned Commission. But it is true that the profit from operation after tax of Rs. 56.09 Cr is derived from the Utility by the Applicant for the previous FY24.

- 3.1 **Deferred Tax :** That deferred tax is a provision done by the Auditor for ensuing years. This tax provision does not have any relationship with the accounts of previous FY24. That is why in the proceeding to determine the TT, Ld OERC ignores such provision for deferred tax. As reveals from Form No. 20 titled Profit & Loss Account, the Applicant provides a sum of Rs. 251.59 Cr for deferred tax and such provision for tax in the P&L A/c makes the Utility loss making to the tune of Rs. 178.56 Cr. for FY24. It is surprised to note that the Balance Sheet of the Applicant for the year ending FY24 provides deferred tax provision of Rs. 397.65 Cr whereas the P&L A/c debits only 251.59 Cr. Why this difference occurs between P&L A/c and Balance Sheet for FY24? Coming to the current FY25, nothing provision for deferred tax is provided because of the provision done for



previous year and for which it made profit of Rs. 31.51 Cr after tax. The financial position of the Utility at present Transmission Tariff looks excellent because it provides profit for Rs. 255.16 Cr after tax. In view of above, we can say that the financial position of the Transmission Licensee is good because in all three years FY24, FY25 & ensuing FY26 it derives profit from operation.

3.2 **P&L Account & Truing up for FY24:** That the Licensee submits P&L Account in Form No. 20 & the abstract of truing up at Table no.39 of the instant petition as desired by regulations of the Commission. Both the Table are presented below:

**Profit & Loss Accounts**

SI No	Particulars	Rs. in Crores		
		PY24	CY25	EY26
<b>A</b>	<b>INCOME</b>			
	Revenue from LTOA	865.20	913.76	1,398.71
	Revenue from Interstate sale	8.14	7.75	8.14
	Revenue from STOA	162.84	165.00	176.28
	Revenue from MTOA	0.00	-	12.00
	Income from Investment	74.34	80.00	20.00
	SLDC	12.49		
	Other Misc.Receipt	63.52	50.00	48.20
	<b>Sub-total (A)</b>	<b>1,186.53</b>	<b>1,216.51</b>	<b>1,663.33</b>
<b>B</b>	<b>EXPENDITURE</b>			
	Employees cost	502.19	529.25	554.05
	R & M Cost	131.61	151.62	217.70
	Admn. & General Expenses	48.20	46.91	50.15
	Interest & Financial Charges	120.96	128.40	145.61
	Depreciation & Amortisation expenses	294.20	301.99	356.57
	Rebate allowed to Customer	16.34	17.85	27.97
	Exemption under OERP-2022		2.31	2.10
	Miscellaneous			
	Prior period debit/credit			
	<b>Sub-total (B)</b>	<b>1,113.50</b>	<b>1,178.33</b>	<b>1,354.15</b>
<b>C</b>	<b>Profit / (Loss) before tax other adjustment (A-B)</b>	<b>73.03</b>	<b>38.18</b>	<b>309.18</b>
<b>D</b>	<b>Total tax expense (VI)</b>	<b>251.59</b>	<b>6.67</b>	<b>54.02</b>
<b>E</b>	<b>Profit/(Loss) After Tax (C-D)</b>	<b>(178.56)</b>	<b>31.51</b>	<b>255.16</b>

**Table No. 39: ABSRTACT OF TRUING UP FOR THE FY 2023-24**

Particulars / Year	(Rs. Cr.)			
	OERC	Actual as per Audited	Truing up	Surplus/

Power Analyst  
Odia

	Approval	Accounts		(Deficit)
<b>Expenditure</b>				
<b>Expenditure</b>				
A. Employee Cost (Net)	449.08	493.67	493.67	-44.59
B. R & M Cost	135.00	130.83	130.83	4.17
C. A & G Cost (Incl SLDC and GCC)	40.28	46.83	42.81	-2.53
<b>Sub-Total (A+B+C)</b>	<b>624.36</b>	<b>671.33</b>	<b>667.31</b>	<b>-42.95</b>
D. Depreciation	269.54	294.71	294.71	-25.17
E. Interest on long-term liability	111.83	120.96	120.96	-9.13
F. Rebate	17.92	16.23	16.23	1.69
G. Incentive for system availability	5.00		13.46	-8.46
H. GCC Expenses	0.35	-	-	0.35
<b>Sub-Total (A to H)</b>	<b>1,029.00</b>	<b>1,103.23</b>	<b>1,112.67</b>	<b>-83.67</b>
I. Return on Equity	140.42		172.21	-31.79
J. Income tax	27.21		10.77	16.44
<b>Grand Total (A to J)</b>	<b>1,196.63</b>	<b>1,103.23</b>	<b>1,295.65</b>	<b>-99.02</b>
<i>Less: Inter-state wheeling &amp; Misc. Revenue</i>	300.45	412.67	282.59	17.86
<b>Net Transmission Cost</b>	<b>896.18</b>	<b>690.56</b>	<b>1,013.06</b>	<b>-116.88</b>
Revenue from Transmission Charges	896.18	873.35	873.35	22.83
<b>Difference to be allowed in truing up (FY 2023-24)</b>	<b>-</b>	<b>182.79</b>	<b>-139.71</b>	<b>-139.71</b>



3.3 That in the abstract of truing up table no. 39, the Applicant depicts the actual income as per audited a/c is Rs. 1286.02 Cr for FY24, the breakup of which is inter-state wheeling & Misc Revenue is 412.67 Cr and Revenue from Transmission Charges is Rs. 873.35 Cr. But in Form No. 20, the total income is shown as Rs. 1186.53 Cr including SLDC Charges of Rs. 12.49 Cr. for same FY24. There is difference of around Rs.112 Cr (excluding SLDC Charges). The Licensee is urged upon to comply the above difference.

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Odisha

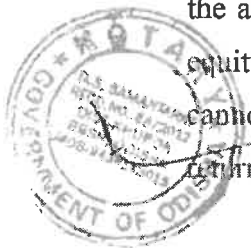
3.4 The Applicant says about deficit truing up gap of Rs. 139.71 Cr. Such high deficit revenue gap is arising due to non-consideration of full inter-state wheeling and Misc Revenue of Rs. 412.67 Cr. Out of the full income of Rs. 412.67 Cr, the Applicant has considered only 282.59 Cr in the true up exercise, thereby leaving a sum of Rs. 130.08 Cr outside the purview of regulatory accounts. Therefore, I urge upon Ld OERC to consider the full income of Rs. 412.67 Cr under such head in the truing up exercise in the interest of the State.

3.5 The audited a/c for FY24 shows revenue surplus of Rs. 182.79 Cr whereas the Applicant has trued up leaving deficit gap of Rs. 139.71 Cr. This is huge mismatching, need to be addressed appropriately by Ld OERC in the interest of the State.

3.6 That the Applicant has estimated the other revenue (excluding the LTOA consumers) for Rs. 264.62 Cr or ensuing year but the audited a/c for previous FY24 shows Rs. 412.67 Cr. So in comparison to PY24, the Licensee has under estimated other revenue to the extent of Rs. 148.05 Cr. The Applicant is required to reply, why they have under estimated the other revenue.

3.7 **ROE (Return on Equity):** That the equity of OPTCL comprises mostly public capital disbursed by Govt of Odisha from State Budget or the plough back funds of the applicant. The audited a/c does not pass through the return on equity. The Licensee does not spell out the amount of loan capital converted into equity. Therefore, I presume that the return of equity of Rs. 172.21 Cr proposed for truing up is derived from public capital. The public cannot pay return for their own capital. Therefore, I urge upon Ld OERC to set aside the return on equity proposed by the Applicant in the truing up exercise.

3.8 **Compliance to the queries on levy of GSC by OERC:** That the Applicant has filed an Application (Case No 44 of 2024) before Ld OERC on 26.06.2024 for determination and approval for levy of Grid Support Charges for industries having Captive Generating / Cogeneration plants and running in parallel with the Grids of OPTCL subsequent to order dated 06.07.2023 of Hon'ble Orissa High Court in W.P(C) No-2220 of 2021 & W.P(C) No-16513 of 2021 filed by M/s Vedanta Limited and M/s CCPPO Odisha respectively. The Learned Commission has initiated proceeding in case no 44/2024 & passed an interim order dated 09.07.2024 in which the Applicant is directed to submit a



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consolidated report on certain queries. The Applicant is not filed yet the compliance report to the queries of the Commission. Therefore, I urge upon the Applicant to file the compliance report asked by the Commission at earliest, which will enable the Commission to levy GSC. The fact is that, the Applicant will get additional source of revenue from levy of GSC which shall be passed on to the end users resulting further reduction in transmission tariff.

4. **ARR & Tariff for FY26:** In the tariff revision proposal, the Applicant submits deficit Revenue gap of Rs. 468.37 Cr at Table no. 27 for ensuing FY26, justifying that the aggregate revenue requirement for ensuing FY26 is Rs. 1398.71 Cr against which Rs. 930.34 Cr will be recovered from Long Term Open Access (LTOA) Customers at the existing TT of 24 Paisa/Unit. Therefore, to bridge the deficit revenue deficit gap, the Applicant proposes hike of transmission charges to 36.08 Paisa/Unit or otherwise Rs. 8660/- per MW/Day at Table no. 28. The tariff hike proposal calculates transmission of 38764.29 MU at an average power flow of 4425.15 MW/Day in the transmission network of the Applicant so as to meet the state demand for the ensuing FY26.

- 4.1 **GRIDCO Projection:** With reference to the OERC case no. 94/2024, the deemed power trader GRIDCO submits Table no. 74 titled Summary of Power Purchase Cost for FY26 in the application for determination of bulk price for ensuing FY26. The table reveals that 43949.49 MU energy is available in the bucket of GRIDCO for FY26 out of which 40117.06 MU energy will be sold to LTOA Customers including DISCOMs to meet the State demand. The Para no. 241 of GRIDCO's Application, "The Petitioner GRIDCO humbly submits before the Hon'ble Commission that after considering the estimated energy availability in the basket of GRIDCO based on the contracted/tied-up capacities as per the subsisting PPAs the Average Power Purchase Cost (APPC) for procurement of 43,949.49 MU to be procured at total cost of Rs.14,916.83 Crores has been estimated to be 339.41 Paise/kWh." The above submission of GRIDCO reveals that 43949.49 MU energy will be traded by GRIDCO through the transmission networks of OPTCL during the ensuing FY26 whereas the Applicant OPTCL considers only energy transmission of only 38764.29 MU in his networks and determines transmission charges accordingly. There is a gap of 5185.20 MU energy between the projections of OPTCL and GRIDCO. If we admit the application of GRIDCO to transmit energy of 43949.49 MU during FY26, then the proposed Transmission Charges of OPTCL @36.08 P/U will be revised downward and

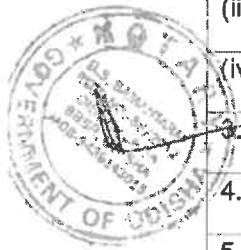


reached at 31.83 Paise/Unit. In the above backdrop, I invite the compliance of the Applicant in the interest of the State.

- 4.2 **Summary of ARR:** That the summary of the ARR is submitted by the Applicant OPTCL at Table no. 25 of the instant application, in which the Aggregate Revenue Requirement (ARR) is projected for Rs. 1398.71 Cr or the ensuing FY26. The ARR is attached below for ready reference of Learned Commission:

**TABLE-25: SUMMARY of ARR OF OPTCL FOR FY 2025-26**

ITEMS	Proposal for FY26 (Rs. Cr)
<b>A) FIXED COST</b>	
<b>1. O&amp;M Expenses</b>	<b>821.90</b>
(i) Employees Cost including Terminal Benefits	554.05
(ii) A&G Cost	49.80
(iii) R&M Cost	217.70
(iv) Expenses related to auxiliary energy consumption	0
(v) Other misc. expenses, statutory levies and taxes (GCC)	0.35
<b>2. Interest &amp; Financial Charges</b>	<b>175.68</b>
(i) Interest on Loan Capital	145.61
(ii) Interest on Working Capital	0.00
(iii) Rebate	27.97
(iv) Incentives as per OERP-2022	2.10
<b>3. Depreciation &amp; amortisation expense</b>	<b>356.57</b>
<b>4. Return on Equity</b>	<b>284.95</b>
<b>5. Income Tax</b>	<b>10.77</b>
<b>Sub-Total (A)</b>	<b>1,649.87</b>
<b>B) Others</b>	
Incentive for system availability	13.46
<b>Total Trans. Cost (A+B)</b>	<b>1,663.33</b>
<b>C) Less Misc. Receipts</b>	<b>264.62</b>



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D)Net ARR to be recovered from LTOA Customers i.e.

1,398.71

**OPTCL's Aggregate Revenue Requirement**

4.3 **Miscellaneous Receipts:** It is once again reiterated that the Applicant OPTCL estimates the Misc Receipts for Rs. 264.62 Cr for ensuing year in the above projections whereas the audited a/c for previous FY24 shows a sum of Rs. 412.67 Cr has been received under Misc Receipts. In comparison to FY24, the Licensee has under estimated Misc revenue to the extent of Rs. 148.05 Cr. The Applicant is required to reply, why they have under estimated the Misc Receipts. Why should it be undercasted? The reason behind the under casting of Misc Receipts for FY26 may be recorded in the instant proceeding if it is approved at lower level than the actual receipts for FY24.

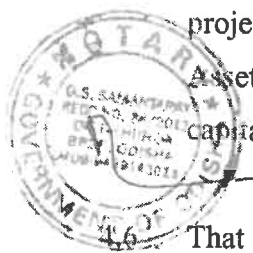
4.4 **Depreciation:** The Applicant has calculated depreciation worth Rs. 356.57 Cr by taking the average of the Assets as on 31.03.2025 & 31.03.2026 and multiplied by the applicable rate of depreciation as per the Table no. 22 submitted in the instant application. The Table no.22 is presented below for ready reference.

Particulars	1	Free Hold Land	Lease Hold Land	Buildings	Electrical Installation	Plant Machinery: (Civil Work)	Plant Machinery	Plant Machinery: (Lines, Cables & Network)	Vehicles	Furniture, Fixture	Office Equipment	Intangible Assets	Total Own Assets
OERC Rates of Depreciation	2		3.34 %	3.34%	5.28 %	3.34%	5.28%	5.28%	9.50 %	6.33%	6.33%	15.00 %	
Book value of own Assets as on 1-4-2023 (on which Dep. Calculated) #	3	54.94	57.31	165.01	12.36	108.90	5367.97	3116.27	2.34	9.46	103.85	17.42	9015.83
Book Value of FA Depreciated (90%) on 01-04-2023	4		0.00	0.50	0.52		824.67	1005.27	2.34	1.49	24.04		1858.82
Book Value of FA (Grant, Beneficiary & Deposit as on 01-04-2023	5	6.29	5.63	8.18	3.95	5.94	1056.28	755.01	0.00	0.52	6.06	0.00	1847.86
Book value of own Assets as on 01-04-2023 (on which Dep. Calculated)	6=3-4-5	48.65	51.68	156.33	7.90	102.96	3487.02	1355.99	0.00	7.45	73.75	17.42	5309.15
Book Value of FA Added in FY 2023-24 (As per Audited Accounts)	7	2.55	1.24	57.75	1.59	17.29	304.91	157.80	0.31	1.01	18.86	0.07	563.38
Deletion/adjustments	8				1.32	-5.07	-21.30				-0.04		-25.09
Book Value of FA Depreciated (90%) in FY 2023-24	9		1.04				7.10	31.54					39.68
Book Value of FA (Grant, Beneficiary & Deposit Assets added in FY24	10	0.00	0.00	4.72	0.00	0.70	79.87	118.24		0.06	2.50		206.09

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Book value of own Assets as on 31-03-2024 (on which Dep. Calculated)	11=6+7 +8-9-10	51.20	51.88	209.36	10.81	114.48	3683.66	1364.01	0.31	8.40	90.07	17.49	5601.67
Depreciation for the Year 2023-24	8	0.00	1.74	6.12	0.55	3.88	197.75	71.39	0.11	0.52	10.09	0.97	293.11
Book value of own Assets as on 31-03-2024 (on which Dep. Calculated)	3	51.20	51.88	209.36	10.81	114.48	3683.66	1364.01	0.31	8.40	90.07	17.49	5601.67
Book Value of FA Added in FY 2024-25 (Own Assets)	4	4.83	4.89	19.73	1.02	10.79	347.15	128.55	0.03	0.79	8.49		526.26
Book value of own Assets as on 31-03-2025 (on which Dep. Calculated)	5=3+4	56.03	56.77	229.09	11.82	125.27	4030.82	1492.55	0.34	9.19	98.56	17.49	6127.93
Depreciation for the Year 2024-25	5=Ave (3,5)*2	0.00	1.81	7.32	0.60	4.00	203.66	75.41	0.03	0.56	5.97	2.62	301.99
Book value of own Assets as on 31-03-2025 (on which Dep. Calculated)	1	56.03	56.77	229.09	11.82	125.27	4030.82	1492.55	0.34	9.19	98.56	17.49	6127.93
Book Value of FA Added in FY 2025-26 (Own Assets)	2	14.72	14.92	60.20	3.11	32.92	1059.24	392.22	0.09	2.42	25.90		1605.73
Book value of own Assets as on 31-03-2026 (on which Dep. Calculated)	3=1+2	70.75	71.69	289.29	14.93	158.19	5090.06	1884.77	0.43	11.61	124.46	17.49	7733.67
Depreciation for the Year 2025-26	4=Ave (1,3)*2	0.00	2.15	8.66	0.71	4.73	240.79	89.16	0.04	0.66	7.06	2.62	356.57

4.5 That the Applicant submits the book values of Fixed Assets funded by Govt grants and Beneficiaries as Rs. 1847.86 Cr by 31.03.2023 and added Rs. 206.09 Cr during FY24. So the total public capital funded in fixed assets as on 31.03.2024 stands at Rs. 2053.95Cr whereas the balance sheet as on 31.03.2024 records only 1730.09 Cr. In the process, public capital worth Rs. 323.86 Cr dies in the accounts of the Applicant, needs recovery. Moreover, the Applicant has added Fixed Assets worth Rs. 526.26 Cr during FY25& projects to add Rs. 1605.73 Cr during FY26 without giving the details of funding of the Assets. Therefore, the applicant needs to say the source of funding behind the additional capitalisation worth Rs. 2131.99 Cr for FY25 & FY26.



4.6 That the Applicant proposes repayment of loan worth Rs. 178.53 Cr during FY26 but claims Depreciation for Rs. 356.57 Cr for the corresponding period which is just doubled of repayment of loan. The Depreciation is chargeable to tariff for the purpose of repayment of loans or say private capital as per the regulations of OERC. The excess depreciation claim of Rs. 178.04 Cr over & above the repayment of loan is redundant. The Applicant has considered average fixed assets of Rs. 6930.80 Cr for the purpose of calculation of depreciation for FY26 but it fails to segregate the public capital lying unheeded in the aforesaid fixed assets, resulted depreciation increased to a unsustainable level. I urge upon

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Ld OERC to initiate necessary action to distinguish the source of funding (public or private) behind capitalisation of fixed assets in order to secure the public capital paid by the people.

4.7 **Return on Equity:** That the Applicant submits in the instant application under the heading Return on Equity at Page no. 47 that the "Book value of own Assets as on 31-03-2024 (on which depreciation will be calculated) is **Rs. 6127.93 Cr.** The above assets have been created with the funding from Share Capital infused by State Government, long term loans from Banks/Financial institutions and internal Cash accrual. Accordingly, OPTCL proposes Return on Equity (RoE) of **Rs. 284.95 Cr.** for FY 2025-26 @ 15.5% on 30% of GFA Rs.6127.93Cr." The above disclosure of Applicant establishes the fact that Public capital funded by Govt and internal cash accrual is considered for the calculation of return on equity. I do strongly object herewith the above act of the Applicant and for which urge upon the learned Commission to trace out the funding of private capital lying unheeded in the capital assets worth Rs. 6127.93 Cr and allow depreciation and Return on Equity on such funding only. By doing so, the public capital contributed by People will be secured and very much effective to make retail tariff competitive and affordable.

4.8 **Corpus funds:** That the Applicant pays every year to the corpus fund created for the payment of terminal benefits like provident fund, Pension and Gratuity as per the actuarial valuation. The Applicant does not disclose the balances lying with the corpus funds as on 31.03.2024. Without knowing the balances of the corpus funds, it is imprudent to pass through the terminal liabilities proposed by the Applicant. Moreover, the learned Commission is required to ensure the security terminal liabilities due to the employees both in the regulatory and company accounts of the Applicant. I do hope, the Applicant will disclose the balances of the three corpus funds as on 31.03.2024.

4.9 **Receipts from CTU:** That the Applicant admits during previous proceedings of OERC that eleven numbers of EHT Lines belonging to OPTCL is providing services more than its 50% capacity to the CTU, PGCIL but the nothing charges is getting in return. The matter is also taken to the notice of learned Commission during previous year's tariff proceeding. Therefore, I urge upon Ld OERC to initiate the assessment of transmission charges due from PGCIL for the use of above eleven numbers of line of OPTCL and pass through the same in the instant proceeding to determine transmission charges/tariff for FY26.



5. **High gaps between Maximum Demand and Minimum Demand:** That the Applicant submits the actual monthly maximum demand, minimum demand and average demand in form no TRP-6 occurred during 18 months ending Sep'24 along with the application. So far as the demand for FY24 is concerned, the Maximum demand of the grid reached 6431.61 MW during Aug'23 & Minimum demand fell down to 2943.06 MW during Dec'23. There is a huge gap of 3488.55 MW between maximum and minimum demand of the grid for FY24. Similarly, if we look into the monthly average demand for FY24, the maximum average demand reached to 5094.70 MW in Mar'24 and minimum average demand fell down to 3893.74 MW in Jan'24. So there is a gap of 1200.96 MW in the monthly average demand of the grid for FY24. The gap between maximum and minimum demand of the grid looks worsen during the first six months of the current FY25. The Table of TRP-6 is given below for ready reference of the learned Commission. I urge upon Ld OERC to initiate necessary measures to bring down the gap for supply of reliable power to one crore consumers of Odisha.

### OERC FORM TRP-6

Month	Max Demand (in MW)	Time of occurrence	Min Demand (in MW)	Time of occurrence	Ave Demand (in MW)
Apr-23	6392.15	19 / 22:00	3286.85	23 / 03:00	4830.60
May-23	6047.90	19 / 16:00	3788.07	16 / 19:00	4916.04
Jun-23	6287.11	05 / 16:00	3234.37	10 / 19:00	4823.75
Jul-23	6084.74	02 / 24:00	4119.66	25 / 14:00	4981.44
Aug-23	<b>6431.61</b>	<b>27 / 23:00</b>	3456.71	02 / 14:00	4866.98
Sep-23	6017.96	10 / 23:00	3842.59	14 / 07:00	4921.60
Oct-23	5911.95	06 / 16:00	3693.30	31 / 14:00	4779.06
Nov-23	5290.92	09 / 19:00	3338.87	26 / 02:00	4149.31
Dec-23	4998.84	12 / 19:00	<b>2943.06</b>	<b>17 / 02:00</b>	3918.72
Jan-24	5030.26	29 / 19:00	2991.14	02 / 04:00	<b>3893.74</b>
Feb-24	5382.17	28 / 20:00	3315.70	01 / 03:00	4312.26
Mar-24	6123.75	10 / 20:00	3672.08	21 / 05:00	<b>5094.70</b>
Apr-24	6647.09	30 / 16:00	4379.95	11 / 15:00	5423.16
May-24	6826.66	28 / 16:00	4019.00	12 / 01:00	5481.36
Jun-24	<b>6927.78</b>	<b>19 / 16:00</b>	4161.99	02 / 23:00	5457.97
Jul-24	6174.94	11 / 23:00	<b>3539.42</b>	<b>26 / 17:00</b>	4939.25
Aug-24	5895.35	18 / 21:00	4025.00	01 / 05:00	4866.96
Sep-24	6114.55	20 / 23:00	4128.57	16 / 15:00	5015.20




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6. **Voltage fluctuations & Under loading Grid S/s:** That the voltage fluctuations below the limit specified by CEA happens mostly in three circles in Odisha, i.e. Jeypore, Burla and Bolangir as reveals from Form P-1 submitted by the Applicant. The Licensee also submits maximum percentage of loading of the high capacity power transformers installed in the grids located throughout Odisha in OERC Form L-9. The data covers total capacity of 26944 MVA. We have filtered the data to know the loading of the transformers below 50% and found that the loading of 13858 MVA capacity Transformers are below 50%. That means 52% of the installed capacity of the grid is loaded below 50%. By stepping one step more, I filtered the data basing on below 40% load and found that 11348 MVA capacity transformers are fell under the range. It is also revealed from L-9 form that 7870 MVA Capacity Transformers are loaded below 30%. It is surprised to note that the total capacity of the grid to the extent of 3849 MVA is under loaded below 10% load. This is alarming. The high under loading of power transformers (grid capacity) is a matter of concern for the State. If it was not necessary to add more capacity to the grid, then why such capital investment is done in the grid? Is it back up arrangement or installed under pressure of higher authority? The Applicant needs to spell out the reasons behind such high under loading of grid capacity.

7. **Incentive of system availability:** That the Applicant proposes Rs. 13.46 Cr towards incentive for system availability in the ARR for FY26. In accordance with the formulae prescribed in Regulation 6.5, the Applicant has considered TAFY of 99.98% & approved ARR of Rs. 896.18 Cr for FY24. The application says, OPTCL is entitled to get incentive if the Transmission System Availability Factor for the year is greater than the Normative Annual Transmission System Availability Factor (NATAF) of 98.50%. TAFY has been arrived at 99.98% and the same is verified by SLDC, the Applicant says. My observation is greater the TAF, better the power supply in the State. But the quality of power supply and reliability is poor in the State because if we move to rural areas, the consumers are not relied to power supply and they prefer back up power supply and hiring Diesel Generators. In such scenario, the Transmission Licensee claims incentive for higher availability of its networks. Therefore, it is necessary to ask the DISCOMs to verify the TAFY of 99.98% claimed by the Applicant because they know better how the grid system is available to them. I urge upon learned Commission to get the TAFY verified from DISCOMs before approving the incentive claimed by the Applicant.

8. **Summer Peak Load:** That the Peak load during last summer reached at 6927.78 MW on dated 19<sup>th</sup> June'24 at 16:00 Hour. The Peak load is expected to increase further during the summer of ensuing FY26. Therefore, I urge upon the learned Commission to approve the Peak demand not less than 7500 MW for the ensuing FY26 in order to supply reliable power to one crore Consumers of Odisha.
9. **Reliability of Power Supply:** The role of the Applicant OPTCL to ensure the improvement in the reliability of power supply during the peak summer period in Odisha is commendable. The State grid managed by the Applicant supplies power while it needs most during peak summer period, needs appreciation. Despite Applicant's timely efforts and cooperation, the reliability of power supply in Odisha is worst as reveals from the report of CEA (Central Electricity Authority). Question arises, what should be the GOOD reliability of power supply, or what is good power supply? We have various indices including the two major indices SAIDI & SAIFI to measure the reliability of power supply but this humble Power Analyst differs with the aforesaid indices. I will agree with you on good power supply in Odisha at that time while the People lived in Rural Areas are not requiring Diesel Generators to host their social, ceremonial and political functions and celebrations. At that time People I will say People have faith on our power supply and that is my good reliability of power supply. I do hope, with your kind cooperation and support, we will be able achieve the above target of good power supply by 2036 while our linguistic based State Odisha observing centenary foundation year.



Coming to the topic of improvement of reliability of power supply, CEA is publishing reports for States in every year which is available in public domain. You put your finger on smart phone; you will find the reliability indices on power supply prevails in various States. The rank of Odisha is very poor. The Electricity Act, 2003 provides beautiful mechanism to improve the reliability of power supply. Ld OERC notified the Licensee's standard of performance regulations in the year 2004 in which the Commission makes regulation to calculate two major indices relating to reliability of power supply per month per Consumer. But those regulations were limited within the calculation the two major indices SAIDI & SAIFI (System Average Interruption Duration Index & System Average Interruption Frequency Index). The reliability indices Regulations did not have teeth to bite the failure of services. The matter of reliability of service was discussed in the forum of Regulators constituted under the provisions of the Act.

In the year 2018, the Forum of Regulators (FOR) conceived the alarming indices for unreliable supply prevails in various States from Cities to rural areas. Therefore, the FOR prescribed standards for SAIDI & SAIFI and recommended normative index 10 Hours power interruption per Month/Consumer under SAIDI and normative index of 15 power interruptions per Month/Consumer under SAIFI. That means a consumer will sustain maximum power cuts 15 times totalling 10 Hours per Month, beyond that the DISCOMs will be penalized in an automatic manner. OERC did not compare the status of power supply that prevails in the Cities and Towns of other States considering the CEA report and notified the same normative indexes by amending the Standard of Performance Regulations, 2004 in the year 2019.

How many times & how many hours, a bonafide Power Consumer of BBSR sustains power interruptions are known to everybody with us who lived with without automatic Diesel Generators. But if you study the CEA data, you will find that the Consumers live in the Cities of Gujurat, Maharastra, Madhya Pradesh and other States are sustaining only 5 minutes & 5 interruptions per Month. That is why I object herewith the normative indexes approved by OERC in the year 2019. In the meantime, the Central Govt notifies the Electricity (Rights of Consumers) Rules, 2020 and four amendments to the rules are done so far. The Rights of Consumers rules pay deep attention to reliability of power supply. The Central Govt has developed five indices including the two major indices SAIDI & SAIFI.

The low reliability of power supply in the central Odisha operated by TPCODL is given in Table 8-1 as submitted by former, which can be viewed below:



Parameters	FY23	FY24
Interruptions	141173	85662
SAIDI	137	176
SAIFI	341	312
PT Failure	0.71%	0.43%
DT Failure	3.42%	3%

That we have in hand only 11 years left to reach the Centenary Foundation year of Odisha and we are to work in such a manner that the Consumers of rural Odisha will trust on supply of electricity. We are to ensure that, by the centenary year 2036, the Consumers of rural Odisha would not be like to hire Diesel Generators for various social, ceremonial and


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political functions. All the Enterprises of the State Power Sector namely OHPC, OPGC, OCPL, OPTCL, TPCODL, TPNODL, TPWODL & TPSODL are making profits. GRIDCO's status is different than a deemed Power Trader. Being the power trader, GRIDCO makes Rs. 1010 Cr profit during last FY24 on which the Stakeholders are concerned. But being SDE, Equity holders on behalf of Govt and Nodal Agency of Govt of Odisha, it makes loss on which the Stakeholders of State Power Sector including the Regulatory Body are least concerned. Therefore, the mission to dissuade the use of Diesel Generators by 2036 is not a difficult task for us.

On the above backdrop, it has been necessary in the part of regulatory body OERC to make new regulations for Licensee's Standard of Performance. Leaving the matter of making regulations to the Commission, I urge upon the learned Commission to initiate necessary calculations in the instant proceeding for approval of normative indexes for SAIDI & SAIFI at least for the Capital City of Odisha BBSR. If we will able to improve the power supply at BBSR by next year through proper implementation of SAIDI & SAIFI normative indexes now approved by the learned Commission, then 2036 is not far away to accomplish the goal of good power supply in Odisha. Good Power Supply in the Capital city of Odisha will be a torch light for other Cities, Municipalities, NACs and Gram Panchayats. Therefore, I seek your kind cooperation on the issue to reach the goal. Thank you.

## P R A Y E R

It is, therefore, most respectfully prayed that the Hon'ble OERC may graciously be pleased:

- 
- (i) to admit this e-filing of Objections & Suggestions;
  - (ii) to initiate necessary remedial measures to maintain & upkeep the timelines given in the Electricity Act, 2003 & the Rules, Regulations, Codes, Plans and Policies enacted there under and frame new TT Regulations, 2025 & business plan (Fy25 to FY29);
  - (iii) to initiate necessary action for recovery of public capital dies in the regulatory accounts since 01.04.1995 & adjust the Depreciation and ROE accordingly;
  - (iv) to direct the Applicant to file the required documents as per regulations as sought by us in our objections & suggestions;
  - (v) to pass an order to distinguish the Private Capital from Public Capital and treat the same as desired by the Act and Regulations in the instant proceeding;

- (vi) to consider the power availability projected by GRIDCO & determine TT accordingly;
- (vii) to direct the Experts paid by OERC to scrutinise the corpus fund, Misc Receipts & other areas against which we have raised objections & suggestions;
- (viii) condone any inadvertent omissions/errors/shortcomings & permit the Respondent to add/ change/modify/alter this filing & make further submissions as may be required at a further date;

And Hon'ble Commission may be pleased to pass such further or any other order(s) as may deem fit & proper in the facts and circumstances of the case in the interest of justice so as to make electricity sustainable;

This Humble Respondent craves leave and reserve the right to make further submission.

And for this act of kindness the Respondent shall as in duty bound ever pray.

**Place: Bhubaneswar**

**Date: 16.01.2025**

*Ananda Kumar Mohapatra.*

**Respondent**

**ANANDA KUMAR MOHAPATRA,  
POWER ANALYST (Freelance).**



Power Analyst  
Odisha  
*16-01-2025*  
DUSASAN SAMANTARAY  
NOTARY, GOVT. OF ODISHA  
BHUBANESWAR, ODISHA  
REGD. NO. 88/2012  
MOB-9439143015

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
PLOT NO. 4, CHUNAKOLI, SAILESHREE VIHAR,  
CHANDRASEKHARPUR, BHUBANESWAR-751021

CASE NO. 93/2024  
FILING NO. 3

**IN THE MATTER OF:** (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

**And**

(ii) Truing up application for the FY 2023-24 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

**AND**

**IN THE MATTER OF:** Odisha Power Transmission Corporation Limited, Janpath,  
Bhubaneswar

..... Applicant

**vrs**

Sri Ananda Kumar Mohapatra and 15 others.

..... Objectors

**Rejoinder to the objections raised by the Objector Sri  
Ananda Kumar Mohapatra.**

**The humble applicant above named  
MOST RESPECTFULLY SHEWETH:**

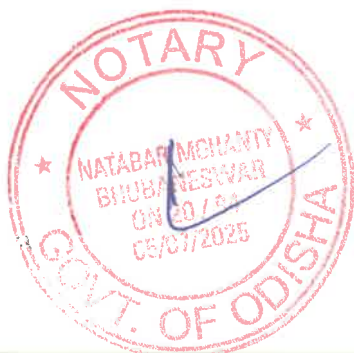
1. That the Objector Sri Ananda Kumar Mohapatra vide affidavit dated 16.01.2025 has raised certain objections & suggestions on ARR & Transmission Tariff Application of OPTCL for FY 2025-26 and Truing up application for FY 2023-24. In reply, OPTCL submits its rejoinder in the following paragraphs.



*Prabbeer Kumar Mallik*

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2. It is observed that in some of the paras, the objector has mentioned/raised certain suggestions /queries which are not directly relevant to the present tariff petition No 93/2024. Therefore, instead of giving a para-wise Rejoinder, OPTCL is submitting the following reply in relevance to the ARR of OPTCL for F.Y. 2025-26 which is as under:
3. M/s. Odisha Power Transmission Corporation Limited, Bhubaneswar (in short OPTCL) undertakes Intra State transmission business in the state of Odisha. It has been notified as the State Transmission Utility (STU) U/s 39(1) of the Electricity, 2003.
4. Being the STU as well as a Transmission licensee, OPTCL is primarily responsible for transmitting electricity from power generation companies to the distribution companies within the State. The transmission infrastructures have been created based on the requirement / recommendation of Distribution Companies considering following components mainly:-
  - To provide the power supply to upcoming Industrial hub.
  - To strengthen the Inter State Power connectivity for import / export of power.
  - To improve the voltage profile in the low voltage area/pockets.
  - To provide un-interrupted power to the EHT, HT and LT Consumers of the state
  - Availability of alternate power supply and also meet the N-1 Transmission planning criteria
  - To improve the system availability, reliability & quality of the power supply.
  - To meet the future load growth.
  - To improve socio economic status of peripheral inhabitants.
  - To reduce Transmission Losses.
5. It may be noted that OPTCL has been maintaining system availability above 99.98% which is always above the normative system availability of 98.50%.
6. Except NALCO & IMFA, all the open access customers are the consumers of Distribution Companies. Therefore, the consumers of Odisha are the ultimate beneficiaries of all the transmission infrastructure created by OPTCL.
7. OPTCL has adopted the principles enunciated in the Transmission Tariff Regulations, 2014 for proposing the different components of ARR for FY 2025-26 in the present application. Except return on equity, all the components allowed in the ARR are subject to trueing up, which are carried out on the basis of actual expenses booked in the Audited books of Accounts of OPTCL. Considering the requirement for expenses on operation and maintenance, debt service obligation and other expenditure as per the provisions stipulated in the Regulations, 2014, the transmission tariff is projected with justifications.





8. In the regulatory process all the controllable/uncontrollable cost incurred by licensee needs to be recovered through tariff so as to make it cost effective without burdening the consumers. It is obligatory for the transmission licensee (STU) for conducting its operation through the amount approved by Commission. Also, it caters to the growing demand of the state at optimal cost. Being the transmission licensee, OPTCL endeavor to exercise to control its expenditure on different heads to the minimum possible extent. It may be pertinent to mention that projection has been made on the actual expenditure incurred in 1<sup>st</sup> half of FY 2024-25 along with the likely expenditure to be incurred in FY 2025-26.
9. All the Electrical consumers of the State irrespective of the classification, as stated under Supply Code 2019, are consumers of any of the four Distribution licensees notified by the OERC based on their area of supply. All the transmission infrastructure created by OPTCL are based on the demand and requirement of the Distribution Companies for quality and reliable power supply to the consumers of Odisha. Therefore, Distribution licensee are the major contributor of Transmission Tariff of OPTCL and OPTCL is raising the transmission charges bill based on the actual Energy Consumption by the Distribution consumers at delivery point as per the direction of the Hon'ble Commission and prevailing regulation. Both POC and Postage Stamp method are the methods used for recovery of the transmission charges from the beneficiary. In the present scenario the element wise tariff of OPTCL network is not being determined, therefore the applicability of POC charges method is not implementable. Considering only four Distribution companies, the recovery of transmission charges on POC method will have no adverse impact on recovery of OPTCL revenue as well as extra burden on beneficiaries. The present OERC (Terms and Conditions for Determination of Transmission Tariff) Regulation, 2014 is effective initially upto March'2019. In exercising the powers of Regulation-9, Hon'ble Commission has extended this regulation till further orders. In the meantime, Hon'ble Commission has Gazetted the OERC Retail Supply Regulation-2022 and OERC Generation Regulation-2024. Therefore, the petitioner also agrees with the views of the objector and argue before the commission for a new transmission tariff regulation.
10. As per the present regulation, the transmission tariff is determined on yearly basis considering the latest data after prudent check which is more realistic than 5 years projection. OPTCL has submitted the Business Plan for the Control Period 2024-2027. As per the direction of the Hon'ble Commission OPTCL will submit the revised Business Plan for the control period 2024-2027 shortly incorporating the required information.

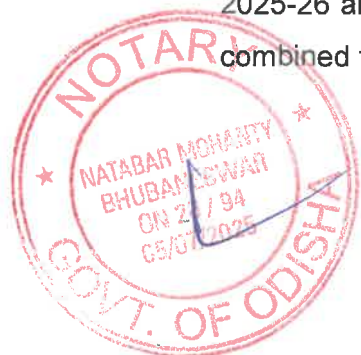


11. Deferred tax assets are recognized for unused tax losses / credits to the extent that it is probable that taxable profit will be available against which the losses can be utilized. Management judgment is required to determine the amount of deferred tax assets that can be recognized, based upon the likely timing and the level of future taxable profits together with future tax planning strategies. Deferred tax calculation for FY 2023-24 is attached as **Annexure-01** for the clarification.
12. The difference of Rs. 112 Cr. in the miscellaneous income is nothing but deferred income which is always kept aside during tariff calculation. Similarly, the excess provision written back amounting to Rs. 18.08 Cr. is not an income but written off from part of an income which was already tried up in earlier year. Therefore, Rs. 138.08 Cr. should not be part of the miscellaneous income. The projection of miscellaneous income for the F.Y. 2025-26 has been made considering the present trend and future projections only. Some of the income miscellaneous of F.Y. 2023-24 may not be in F.Y. 2025-26.
13. OPTCL has proposed to recover ARR amount of Rs. 1398.71 Cr. from DISCOMs and other LTOA customers on 38,764.29 MU energy @ 36.08 P / kwh as transmission charges as detailed below:-

SL No.	DISCOMS	MU Projected	Less:- Drawal in 33 & 11 KV	Net Projected MU	Proposed rate@ p/u	Rs in Cr.
1	TPCODL	13823.00	32.00	13,791.00	36.08	497.58
2	TPWODL	11274.00	324.00	10,950.00	36.08	395.08
3	TPNODL	8378.40	31.00	8,347.40	36.08	301.17
4	TPSODL	5062.00	53.00	5,009.00	36.08	180.72
5	Other LTOA customers	666.89	-	666.89	36.08	24.16
	<b>TOTAL</b>	<b>39,204.29</b>	<b>440.00</b>	<b>38,764.29</b>		<b>1,398.71</b>

The above MU projections were made by concerned DISCOMs and other LTOA customers based on OPTCL's request for the ARR purpose.

14. As per the Audited Accounts the closing balance of Grant Assets and Other than Grant Assets (Beneficiaries) as on 31.03.2024 is Rs. 2053.95 Cr. not Rs. 1730.09 Cr. (ref. page no. 444 of the application). Further, OPTCL is executing various projects / scheme with the funding of Government support (Equity & Grant), Long Term loans from banks / Financial Institution and Internal Accrual. The proposed addition for F.Y. 2024-25 & 2025-26 amounting to Rs. 526.26 Cr. and Rs. 1605.73 Cr. respectively will be funded combined from the above sources.



15. OPTCL denies the submission of Respondent on Deprecation and Return on Equity which are out of the provisions of Regulations- 2014.

16. The corpus funds of three nos. of Terminal benefit Trusts as on 31.03.2024:

Sl.No.	Name of the Trust	Rs. in Crores.
01.	Pension Fund	3040.82
02.	Gratuity Fund	117.67
03	Leave Encashment Fund	153.98

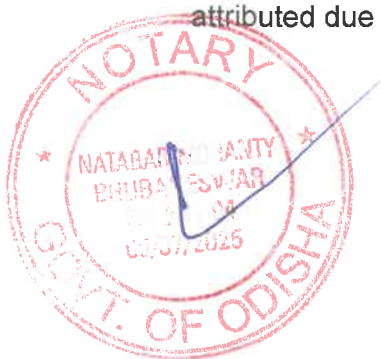
17. OPTCL has filed a petition Vide No. 288/TT/2023 before CERC for inclusion of 9 nos. the transmission assets in Computation of Point of Connection (PoC) Charges and Losses as per the Commission's order dated 12.5.2017 in Petition No. 7/SM/2017 for inclusion in PoC charges in accordance with the Central Electricity Regulatory Commission (Sharing of Inter-state Transmission Charges and Losses) Regulations, 2010 as amended from time to time read with Regulations 111 to 113 of the Central Electricity Regulatory Commission (Conduct of Business) Regulations, 1999. The matter was heard on dtd. 09.09.2024 and the order is reserved. Therefore, pending such order it will not be prudent to assess any tariff on the above 9 nos. of lines as pass through.

**18. Levy of Grid Support Charge for connectivity:**

The benefits derived by the CGPs with co-located loads are enormous. The benefits are in the nature of ancillary services which are not paid till now. The Grid support charges (GSC)/Parallel operation charge has been levied by different state Regulatory Commissions and upheld by APTEL and Supreme Court of India through various orders and hence proposed by OPTCL through a separate petition. Recently, OPTCL had filed an application (case No. 44 of 2024) on 26.06.2024 for determination and approval for levy of Grid Support Charges for industries having Captive Generating / Cogeneration plants and running in parallel with the Grids of OPTCL. Hon'ble Commission in its order directed OPTCL to submit a consolidated report considering the observations/queries raised by the stakeholders in the earlier Cases filed by OPTCL. In compliance to above, OPTCL is in final stage of preparation of the required consolidated report and will be submitted before Hon'ble Commission shortly.

**19. Gap in Maximum and Minimum demand (Para-5)**

High gap in Maximum and Minimum demand of power in the state of Odisha can be attributed due to following reasons.



**Seasonal Variation:** Power demand fluctuates based on the season. For example, summer months tend to see higher demand due to increased use of air conditioners and cooling systems, whereas in winter, demand tends to decrease as cooling needs reduce.

**Agricultural Demand:** In rural regions, particularly in agricultural states like Odisha, the demand for power spikes during the irrigation seasons when farmers need electricity to power pumps for irrigation.

**Industrial Load Fluctuations:** Odisha has a significant industrial base, especially in sectors like steel and aluminium production. Large industries are self-reliant with their captive generation plants (CGPs) for power consumption. However, during the outage of any generating unit, they tend to draw power from the grid, which increases the total demand on the grid.

**Urban vs Rural Disparity:** Urban areas generally have a more consistent demand, while rural areas experience fluctuating needs, especially if agricultural activities are tied to irrigation schedules or crop cycles.

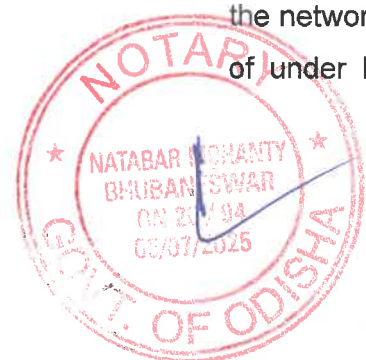
It is worth mentioning that load demand on EHT system is not in the control of OPTCL.

## 20. Voltage fluctuations & Under loading Grid S/s (Para-6)

OPTCL is making every effort to prevent under-voltage issues which includes conversion of S/C to D/C, up-gradation of old conductors with HTLS conductors, conversion of radial to ring system and establishment of new grid substations to meet the requirements of DISCOMs. However, momentary voltage fluctuations may still occur in the system due to mismatch between load and generation or excessive reactive energy drawal.

Total Transformation capacity comprise of ICT, Auto & Power Transformers. It is worth mentioning that Power Transformers serve the 33kV feeder demand whereas ICT and Auto Transformers are utilized to change the voltage level. Additionally, as per CEA guideline, additional transformers are installed to meet N-1 contingency criteria. Due to delay in takeoff arrangement by DISCOMs, some GSS in OPTCL are in under loaded condition.

To prevent overloading, regular system study are being carried out and augmented the network capacity as and when required. Priority has always been given to make use of under loaded network. As directed by Commission, regular meetings have been



conducted with DISCOMs for creation of downstream infrastructure for optimum utilization transmission networks.

**21. System availability (Para-7)**

SLDC is responsible for carry out real time operations for grid control and despatch of electricity within the state of Odisha through secure and economic operation. Further, all the tripping details are published on monthly basis in SLDC's website and accordingly Transmission system availability is computed which is duly certified by CLD, SLDC as per provisions stipulated in the extant OERC Transmission Tariff Regulations, 2014.

Moreover, the operations of DISCOMs are limited to 33kV and lower voltage networks and they are unaware of the details of EHT network tripping events. Hence, the proposal of respondent to verify TAFY of OPTCL by DISCOMs is not just and proper.

**22. Summer Peak Load (Para-8)**

OPTCL is capable enough to handle the anticipated load growth in FY 2025-26.

**23. Reliability of Power Supply (Para-9)**

Said para is not related to Transmission Licensee.

24. Anything not specifically admitted or dealt with shall be deemed to have been denied. The Answering Respondent craves leave and reserves its rights to make further submissions at the time of hearing. The objections not specifically admitted may be deemed to have been denied.

**PRAYER**

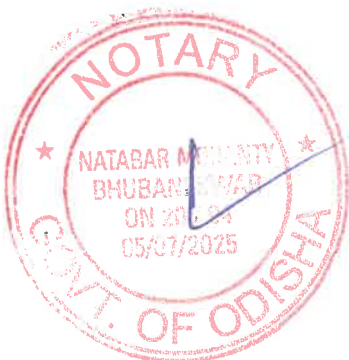
In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of Sri Ananda Kumar Mohapatra while approving ARR and Transmission Tariff of OPTCL for FY 2025-26 & Truing up application for the FY 2023-24.

By the Applicant  
Through

Bhubaneswar  
January 31, 2025

*Prabir Kumar Mallik*

Sr. GM (EI.), RT&C



<b>Deferred Tax</b>		
<b>Why this difference occurs between P/L Account and Balance Sheet for FY 2023-24</b>		
		Amount in Rs. Crore
(a)	<b>Deferred Tax Liabilities as on 31.03.2023</b>	<b>166.63</b>
	Add: Provision made towards Déffered Tax	234.65
		401.28
	Less: Deferred Tax relating to Other Comprehensive Income i.e Income Tax relating to item that will not be reclassification to P/L Account.	-3.63
	<b>Deferred Tax Liability as on 31.12.2024</b>	<b>397.65</b>
(b)	<b>Profit &amp; Loss debited only 251.59 Cr towards Tax Expenses as follows</b>	
	Current Tax (MAT)	11.29
	Tax for earlier years	5.65
	Deferred Tax	234.65
	<b>Total Tax expenses for FY 2023-24</b>	<b>251.59</b>

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION  
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**AND**

**IN THE MATTER OF:** Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

..... **Applicant**

**Shri Ramesh Ch. Satpathy**, Secretary, National Institute of Indian Labour & President of Upobhokta Mahasangha and **15 others.**

..... **Objectors**

**Affidavit verifying the submission**

I, Sri Prabeer Kumar Mallick, son of Late Binod Bihari Mallick, aged about 59 years, residing at Cuttack, do solemnly affirm and say as follows:

1. That, I am the Senior General Manager of Regulation, Tariff & Commercial wing of OPTCL and have been duly authorized by the Applicant, OPTCL to make this affidavit on its behalf.
2. That, the Statements made in paragraphs herein above are based on official information and I believe them to be true.

Bhubaneswar

Dt. 31.01.2025

*Prabeer Kumar Mallick*

SWORN BEFORE ME

DEPONENT



*N. Mohanty*  
N. MOHANTY  
NOTARY  
Regd. No. ON 20/94  
382, Bhoi Nagar,  
Bhubaneswar-751022

*31.01.2025*  
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