

Reply to Data Gaps of MYT Petition

1. The petitioner submits the detailed writeup of every scheme in **Annexure-A**. Also, the Annexures pertaining to scheme-wise expenditure and physical targets are being submitted as **Annexure-B** of the replies.
2. The petitioner acknowledges the fact that the compliance to directives, as given by the Hon'ble Commission in its tariff orders, is not only beneficial for the petitioner to improve its operational parameters but also its financial viability in the long run. The Discom has been determined in complying with the directives of the Hon'ble Commission and has also submitted the detailed compliance on 15.09.2020 in the suo-motu petition of the Hon'ble Commission dated 25.08.2020. The delay in compliance of some of the directives as provided in the tariff order dated 6th Feb 2020 is due to the outbreak of the pandemic in the FY20. For instance, the compliance of directive of rationalization of tariffs would have increased the electricity bills during the worst-affected quarter i.e. Quarter 1 of FY21 of some categories of consumers thereby affecting them negatively in such a distressed economic situation. Hence, the petitioner submits that such changes have been proposed now after the situation has improved and requests the Hon'ble Commission to kindly approve such changes. Details of the revised Compliance of Directives are being submitted as **Annexure-B2**.
3. The petitioner submits the Annual Report of the FY 2018-19 and FY 2019-20 as **Annexure-C-1 and Annexure C-2** respectively.
4. As per the Commission's directive and Regulation 11(5) of the RERC Tariff Regulations, 2019, the Discom is required to furnish details of Voltage wise Cost of Supply, exclusive of external subsidies and cross subsidies in respect of each category of consumer in accordance with the Hon'ble APTEL judgment in Appeal No 102 of 2010.

In accordance with the judgment of Hon'ble APTEL in Appeal No. 102 of 2010, the Tribunal had recognized the difficulty in determining cost of supply to different categories of consumers. However, instead of waiting indefinitely for availability of the requisite data for the study, the Tribunal had suggested a simple method which would take into account the major cost elements. The Tribunal had suggested determination of voltage-wise cost of supply taking into account the major cost elements which would be applicable to all the consumers connected at a particular voltage level.

According to the said judgment, in the absence of segregated network costs, it would be prudent to work out voltage-wise cost of supply taking into account the distribution losses at different voltage levels. As power purchase cost is a major component of tariff, the power purchase cost can be apportioned at different voltage levels taking into account the distribution losses at the relevant voltage level and the upstream system.

The study of system to determine voltage wise technical losses is under process and hence voltage wise technical losses are not available at the moment.

In the absence of voltage wise technical losses, the petitioner has considered the technical distribution losses in the distribution network approved by the Hon'ble Commission for 2006-07 in the Order on determination of wheeling charges and cross subsidy surcharge for the year

2006-07 dated 19th September 2006 to work out voltage wise power purchase cost for 2006-07. For commercial losses, the APTEL judgement has suggested apportionment of difference of total and technical losses i.e. commercial losses across all voltage levels in proportion to the sales plus technical losses at the respective voltage levels. In this manner, the total losses have been apportioned at different voltage levels.

The following table gives the details of apportionment of total losses for FY 2006-07

Table 1: Voltage wise Energy input for FY07

Voltage Level	Sales (MU)	Voltage wise Tech Loss (%)	Transmission Loss	Sales + Tech Loss (MU)	Tech. Losses (MU)	Comm Losses (MU)	Total Loss (MU)	Energy Input (MU)
132 KV	537.01	0%	5.60%	568.86	31.86	101.39	133.25	670.25
33 KV	613.72	3.80%	5.60%	675.81	62.09	120.45	182.54	796.26
11 KV	1,150.73	8.80%	5.60%	1,389.41	238.68	247.64	486.32	1,637.05
LT	5,370.07	16.55%	5.60%	7,769.83	2,399.76	1,384.83	3,784.59	9,154.67
Total	7,671.53			10,403.92	2,732.39	1,854.31	4,586.70	12,258.23

The petitioner recognizes the fact that the sales mix has changed over the years but due to the complexity involved in voltage wise feeder metering & consumer indexing, and the adverse geographical situation in the state, it is solicited that the Hon'ble Commission may kindly allow the advice of the Hon'ble APTEL suggested in the FY 2006-07 to be used to estimate voltage wise cost of supply for FY 2019-20 to FY 2023-24. It is important to mention that the Discom has taken a number of steps to reduce AT&C losses at each voltage level. As such in order to arrive at voltage wise input energy, the total projected loss of FY 2019-20 to FY 2023-24 has been apportioned between the different voltage levels in the same ratio as the voltage wise losses in FY 2006-07. Accordingly input energy has been computed for different voltage levels for FY 2019-20 to FY 2023-24 and the total power purchase cost has been apportioned between different voltages on the basis of energy input required as shown below:

Table 2: FY 2019-20

Voltage Level	Sales (MU)	Total Losses (MU)	Energy Input Required (MU)	Total Power Purchase Cost (Excluding Transmission Cost) (Rs Cr)	Cost per unit sold
	A	B	C = A+B	D	E=D/A*10
132 KV	1,745.03	150.58	1,895.61	855.26	4.90
33 KV	1,994.32	206.29	2,200.61	992.87	4.98
11 KV	3,739.35	549.60	4,288.95	1,935.08	5.17
LT	17,450.29	4,277.07	21,727.36	9,802.90	5.62
Total	24,928.99	5,183.55	30,112.53	13,586.11	5.45

Table 3: FY 2020-21

Voltage Level	Sales (MU)	Total Losses (MU)	Energy Input Required (MU)	Total Power Purchase Cost (Excluding Transmission Cost) (Rs Cr)	Cost per unit sold
	A	B	C = A+B	D	E=D/A*10
132 KV	1,659.94	151.22	1,811.16	873.03	5.26
33 KV	1,897.07	207.16	2,104.24	1,014.31	5.35
11 KV	3,557.01	551.92	4,108.93	1,980.63	5.57
LT	16,599.40	4,295.09	20,894.49	10,071.78	6.07
Total	23,713.43	5,205.39	28,918.82	13,939.75	5.88

Table 4: FY 2021-22

Voltage Level	Sales (MU)	Total Losses (MU)	Energy Input Required (MU)	Total Power Purchase Cost (Excluding Transmission Cost) (Rs Cr)	Cost per unit sold
	A	B	C = A+B	D	E=D/A*10
132 KV	1,838.38	145.32	1,983.70	939.85	5.11
33 KV	2,101.00	199.08	2,300.09	1,089.75	5.19
11 KV	3,939.38	530.40	4,469.78	2,117.72	5.38
LT	18,383.79	4,127.59	22,511.38	10,665.57	5.80
Total	26,262.55	5,002.39	31,264.94	14,812.88	5.64

Table 5: FY 2022-23

Voltage Level	Sales (MU)	Total Losses (MU)	Energy Input Required (MU)	Total Power Purchase Cost (Excluding Transmission Cost) (Rs Cr)	Cost per unit sold
	A	B	C = A+B	D	E=D/A*10
132 KV	1,966.79	144.04	2,110.83	985.84	5.01
33 KV	2,247.76	197.33	2,445.09	1,141.95	5.08
11 KV	4,214.55	525.72	4,740.27	2,213.88	5.25
LT	19,667.90	4,091.20	23,759.10	11,096.39	5.64
Total	28,097.00	4,958.29	33,055.29	15,438.06	5.49

Table 6: FY 2023-24

Voltage Level	Sales (MU)	Total Losses (MU)	Energy Input Required (MU)	Total Power Purchase Cost (Excluding Transmission Cost) (Rs Cr)	Cost per unit sold
	A	B	C = A+B	D	E=D/A*10
132 KV	2,083.65	146.65	2,230.30	1,013.67	4.86

Voltage Level	Sales (MU)	Total Losses (MU)	Energy Input Required (MU)	Total Power Purchase Cost (Excluding Transmission Cost) (Rs Cr)	Cost per unit sold
	A	B	C = A+B	D	E=D/A*10
33 KV	2,381.31	200.90	2,582.21	1,173.62	4.93
11 KV	4,464.96	535.24	5,000.20	2,272.60	5.09
LT	20,836.48	4,165.31	25,001.79	11,363.36	5.45
Total	29,766.40	5,048.10	34,814.50	15,823.25	5.32

According to the Hon'ble Tribunal's Judgment, in absence of segregated network costs, all the other costs such as Return on Equity, Interest on loan, Depreciation, interest on working capital and O&M costs can be pooled and apportioned equitably to all categories to determine the cost of supply.

Various elements and computation of network cost per unit has been presented in the table below:

Table 7: Network Cost per Unit

Elements		FY 20	FY 21	FY 22	FY 23	FY 24
Total Cost	Rs. Cr.	7,285.10	9,091.60	8,017.86	8,248.20	8,487.81
Units Sold	MU	24,928.99	23,713.43	26,262.55	28,097.00	29,766.40
Network Cost per Unit (G)	Rs./kWh	2.92	3.83	3.05	2.94	2.85

Based on the methodology suggested by the Hon'ble Tribunal and details provided above, the voltage wise cost of supply for FY 2019-20 to FY 2023-24 have been computed and shown in the following tables.

Table 8: FY 2019-20

Voltage Level	Power Purchase Cost /kWh sold	Network Cost /kWh sold	Cost of Supply/kWh
	F	G	H=F+G
132 KV	4.71	2.92	7.63
33 KV	4.90	2.92	7.82
11 KV	5.17	2.92	8.09
LT	5.65	2.92	8.57
Total	5.45	2.92	8.37

Table 9: FY 2020-21

Voltage Level	Power Purchase Cost /kWh sold	Network Cost /kWh sold	Cost of Supply/kWh
	F	G	H=F+G
132 KV	5.08	3.83	8.92
33 KV	5.28	3.83	9.12
11 KV	5.57	3.83	9.41

Voltage Level	Power Purchase Cost /kWh sold	Network Cost /kWh sold	Cost of Supply/kWh
	F	G	H=F+G
LT	6.09	3.83	9.93
Total	5.88	3.83	9.71

Table 10: FY 2021-22

Voltage Level	Power Purchase Cost /kWh sold	Network Cost /kWh sold	Cost of Supply/kWh
	F	G	H=F+G
132 KV	4.88	3.05	7.93
33 KV	5.07	3.05	8.12
11 KV	5.35	3.05	8.40
LT	5.84	3.05	8.90
Total	5.64	3.05	8.69

Table 11: FY 2022-23

Voltage Level	Power Purchase Cost /kWh sold	Network Cost /kWh sold	Cost of Supply/kWh
	F	G	H=F+G
132 KV	4.75	2.94	7.69
33 KV	4.94	2.94	7.87
11 KV	5.21	2.94	8.15
LT	5.69	2.94	8.63
Total	5.49	2.94	8.43

Table 12: FY 2023-24

Voltage Level	Power Purchase Cost /kWh sold	Network Cost /kWh sold	Cost of Supply/kWh
	F	G	H=F+G
132 KV	4.60	2.85	7.45
33 KV	4.78	2.85	7.63
11 KV	5.04	2.85	7.89
LT	5.51	2.85	8.36
Total	5.32	2.85	8.17

5. As per Regulation 11(5) (g) of RERC Tariff Regulations, 2019, the statement showing calculations of the amount of cross subsidy in the existing tariff is as below:

Table 13: Categorywise Sales (in MU)

	FY20	FY21	FY22	FY23	FY24
Domestic	5,776	6,464	6,909	7,385	7,894
Non-Domestic	2,519	2,053	2,464	2,710	2,905
Public Street Light	181	192	201	211	221
Agriculture (Metered)	7,787	7,925	8,425	9,038	9,464

	FY20	FY21	FY22	FY23	FY24
Agriculture (Flat)	293	260	195	130	65
Small Industry	292	239	287	301	316
Medium Industry	821	675	810	843	878
Large Industry	6,039	4,913	5,896	6,312	6,757
Public Water Works (S)	409	419	464	514	570
Public Water Works (M)	30	31	32	33	34
Public Water Works (L)	313	341	367	394	423
Mixed Load / Bulk Supply	200	202	213	225	238
Total	24,660	23,713	26,263	28,097	29,766

Table 14: Categorywise Revenue (in Rs. Cr.)

	FY20	FY21	FY22	FY23	FY24
Domestic	4078	5051	5374	5740	6131
Non-Domestic	2414	2393	2763	2993	3178
Public Street Light	137	157	164	173	181
Agriculture (Metered)	4040	4729	5021	5383	5641
Agriculture (Flat)	162	216	146	104	63
Small Industry	217	230	264	278	294
Medium Industry	656	701	804	837	871
Large Industry	4665	4973	5725	6148	6681
Public Water Works (S)	292	295	325	357	394
Public Water Works (M)	23	26	27	28	29
Public Water Works (L)	247	292	312	332	355
Mixed Load / Bulk Supply	147	191	200	210	221
Total	18118	19254	21125	22584	24038

Table 15: ABR (Rs./kWh)

	FY20	FY21	FY22	FY23	FY24
Domestic	7.06	7.82	7.78	7.77	7.77
Non-Domestic	9.59	11.66	11.22	11.04	10.94
Public Street Light	7.55	8.18	8.17	8.18	8.19
Agriculture (Metered)	5.19	5.97	5.96	5.96	5.96
Agriculture (Flat)	5.55	8.30	7.48	8.01	9.60
Small Industry	7.43	9.63	9.20	9.25	9.30
Medium Industry	7.99	10.38	9.92	9.92	9.92
Large Industry	7.72	10.12	9.71	9.74	9.89
Public Water Works (S)	7.14	7.05	7.00	6.95	6.90
Public Water Works (M)	7.57	8.38	8.37	8.37	8.38
Public Water Works (L)	7.89	8.57	8.50	8.44	8.37
Mixed Load / Bulk Supply	7.37	9.46	9.40	9.35	9.30
Total	7.35	8.12	8.04	8.04	8.08

Table 16: Average cost of Supply (Rs./kWh)

	FY20	FY21	FY22	FY23	FY24
Net ARR	21,049	23,329	23,147	24,038	24,621

	FY20	FY21	FY22	FY23	FY24
Sales	24,660	23,713	26,263	28,097	29,766
ACoS	8.54	9.84	8.81	8.56	8.27

Table 17: Cross subsidy levels

	FY20	FY21	FY22	FY23	FY24
Domestic	-17%	-21%	-12%	-9%	-6%
Non-Domestic	12%	18%	27%	29%	32%
Public Street Light	-12%	-17%	-7%	-4%	-1%
Agriculture (Metered)	-39%	-39%	-32%	-30%	-28%
Agriculture (Flat)	-35%	-16%	-15%	-6%	16%
Small Industry	-13%	-2%	4%	8%	12%
Medium Industry	-6%	6%	13%	16%	20%
Large Industry	-10%	3%	10%	14%	20%
Public Water Works (S)	-16%	-28%	-21%	-19%	-17%
Public Water Works (M)	-11%	-15%	-5%	-2%	1%
Public Water Works (L)	-8%	-13%	-4%	-1%	1%
Mixed Load / Bulk Supply	-14%	-4%	7%	9%	12%
Total	-14%	-17%	-9%	-6%	-2%

6. The petitioner submits that the figures for FY 2019-20 were submitted based on the provisional annual accounts of the Discom. Since the audited annual accounts for FY 2019-20 are now available, the Petitioner hereby submits the same as **Annexure-A**. Further the revised MYT Formats, duly incorporating the impact of revisions in figures for FY 2019-20, are also being submitted as **Annexure-D**.
7. The petitioner submits that the category-wise sales by the Distribution Franchisee in the area of supply of the Discom are not separately projected. Since the Distribution Franchisee is operating on behalf of the Discoms and not as a separate entity, the Petitioner projects sales at the consumer end, thereby, considering the consumers of the DF as its own consumers. This is in line with the approach adopted by the Hon'ble Commission in its last True-up and ARR Orders.
8. The petitioner has resubmitted the energy balance table reconciling with the formats as a part of the **Annexure-A** and requests the Hon'ble Commission to kindly consider the same.
9. The petitioner submits that the Format 2.5 for the FY 2019-20 in the revised Formats is being submitted as **Annexure-D**.
10. The petitioner submits that there has been a typographical error in the calculations submitted for the generation pertaining to Component A under KUSUM scheme. The revised calculations are being resubmitted in the **Annexure-A** under point 1.19 in the table 7.
11. As per the UDAY scheme, GoR took-over 75% of the outstanding debt of the Discom as on 30.09.2015 in 2 tranches- 50% in FY 2015-16 and the balance 25% in FY 2016-17. Further, GoR has converted the debt taken over from the Discom into Equity and Grant over the period of 5 years from FY 16 to FY 20 as shown in the table below:

Particular	Rs Cr
Outstanding Debt as on 30.09.2015	28056.36
50% Debts taken over by GoR in FY 15-16	13770.47
25% Debts taken over by GoR in FY 16-17	7913.33
Total debt taken-over by GoR	21683.80
Conversion into Equity and Grant	
FY 2015-16	
Equity	1985.87
Grant	0.00
FY 2016-17	
Equity	1045.19
Grant	3135.57
FY 2017-18	
Equity	1040.91
Grant	4163.64
FY 2018-19	
Equity	1040.91
Grant	4163.64
FY 2019-20	
Equity	314.17
Grant	4793.90
Total	21683.80

In order to take-over the debt of the Discoms, the GoR issued non-SLR Bonds at a coupon rate 8.39-8.40% and charged interest of Rs 3768.56 Cr to the Discom.

For the remaining debt of Rs 6372.56 Cr remaining with the Discom, JVVNL issued bonds in FY 16 for Rs 4,776.50 Cr at a coupon rate of 9.80%. Discom made several efforts to issue bonds for the balance debt but could not achieve the same due to the following:

- In the year 2017, Discoms could not issue bonds due to not receiving RBI back stop from GoR within the timeline given to the Arranger.
 - In FY 18, Discoms appointed arranger for mobilizing the funds by issue of bonds on private placement basis but the same could not materialize due to higher coupon rate as well as high commission of the arranger.
 - In April 2019, Discoms again initiated the process to receive bids for issue of bonds directly through NSE-EBP platform but the same could not materialize due to inadequate quantum of bids.
 - In May 2019, RFP was again floated for appointment of arranger but due to unfavourable market conditions, no response received up till the extended deadline of August 19
12. The petitioner submits the detailed computation of sales estimation of agriculture metered and flat rate category for FY 2019-20 to FY 2023-24 in **Annexure-A** in the section “Sales projection for Agriculture Category”.

13. The petitioner submits the details of age wise and category wise no. of defective meters and category wise outstanding arrears upto 31/03/2020 as **Annexure-E1 and E2** respectively.
14. The petitioner submits the detailed computation of weighted average rate of interest on term loan for FY 2019-20 as **Annexure-F** and requests the Hon'ble Commission to kindly consider the same.
15. The Petitioner recognizes the importance of reducing the distribution losses in order to ensure that the state power sector remains viable. The Petitioner has already undertaken several steps and numerous measures are envisaged to be undertaken to bring down the existing loss levels. The actual loss levels for the FY 2019-20 at 17.21% are an indication of the thought process and line of action taken by the Petitioner in this direction.

The Petitioner intends to pursue the loss reduction programs initiated in previous years with increased use of technology. Information Technology, being a tremendous enabler, is the backbone of any complex socio-technical system, allowing to sense, discover, regulate, enforce, control and optimize the system.

The petitioner further plans to implement smart metering which will assist the Discom in better managing the billing and collections. Use of smart meters will also improve the theft detection methods leading to improved vigilance and reduction in losses.

The Discom also plans to solarise grid connected Pumpsets thereby reducing the agriculture consumption and corresponding losses. Also, use of distributed generation, wherein the generating source is close to the load centre, reduces the line losses. Discom plans to install solar plants by utilizing the land available in existing 33 kV substations. Further, physical segregation of agriculture feeders has also been planned. This will ensure that transformation capacity is adequately utilized thereby reducing the iron losses of the transformer.

It is pertinent to request the Hon'ble Commission due to the outbreak of the Covid-19 pandemic, the Discom requests the Hon'ble Commission to kindly revise the trajectory of the Distribution losses for the remaining MYT period.

16. The petitioner submits that it will meet its Renewable Power Obligation for FY 2020-21 to FY 2023-24 by taking the following measures:
 - Procuring power from non-conventional energy sources like wind, solar, hydro and biomass-based plants, the details of which are provided in form 3.1.
 - The Rajasthan Discoms plan to install solar capacity of 2,600 MW at their own substations under Component A of KUSUM.
 - Implementing KUSUM scheme wherein solarisation of 2 lacs existing agriculture pumps will be done and also 2 lacs new agricultural pumps will be set up and the power injected into the grid from such installations will contribute to the Discom's RPO. The solarisation of agricultural pumps will hence benefit the Discom in 2 ways:
 - Solarisation of the pumps will reduce the procurement of power to meet the need of such consumers from conventional energy sources
 - At the same time, the injection of excess energy generated from the solar installations will further reduce the dependence on conventional energy sources.

- Promoting and installing solar rooftops through Net metering arrangement.
 - Further, RUVN has set an action plan for Rajasthan Discoms to meet their RPO targets. The copy of the plan is attached as **Annexure-G**.
17. The Discoms have projected revenue gap in their MYT projections for the period FY 2020-21 to FY 2023-24, for meeting which, revision in tariffs would have been required. However, in current year due to the situations looming under the COVID-19 Pandemic and the financial stress prevalent in the economy, it has been decided not to impose an additional burden of increased electricity tariffs on the consumers of the State at the moment. Therefore, the Petitioner has not proposed any tariff revision in the instant Petition. Moreover, the Petitioner humbly submits that COVID-19 pandemic is an unprecedented event and to estimate its impact there are no past trends and references. The projections for the MYT period are based on Petitioner's assessment of the COVID-19 situation and its impact on various cost and revenue parameters of the ARR. It is pertinent to note that the Pandemic situation is changing on day-to-day basis and therefore, the projections of ARR for FY 2020-21 and subsequently for the remaining 3 years of the MYT period are bound to undergo change as more and more information is available. Therefore, keeping in mind the uncertainty regarding the actual impact of COVID-19 on the ARR projections, the Petitioner humbly submits that a more realistic assessment of the revenue gap shall be available at the time of filing of Annual Performance Review of FY 2020-21 and the Petitioner may be allowed to submit the mechanism for meeting the revenue gap at the time of APR.
 18. The petitioner has estimated the quantum as well as cost for each generating station from where it procures power.
 - a) For the estimation of quantum of power procurement, the availability of each station and the corresponding energy (in MU) purchased from that station for each year of MYT period has been considered same as that for FY 2019-20. In case the energy requirement is more in any particular year vis-à-vis FY 2019-20, the Petitioner has considered energy procurement based on Merit Order Dispatch (MoD) duly keeping in mind the PLF of that particular station does not exceed a normative level of 85%. In case the energy requirement is less in any particular year vis-à-vis FY 2019-20, the Petitioner has reduced the energy procurement from the costliest plant as per the MoD principal duly keeping in mind the PLF of that particular station does not fall below a technical minimum level of 55%.
 - b) For the estimation of cost, the fixed charges and energy charges per unit have been taken the same as for the FY 2019-20 for the FY 2020-21. For FY 2021-22 and onwards, a nominal hike of 2% in the energy and fixed charges has been considered considering the actual increase in the past few years.
 19. The petitioner submits that the cost included in the "Others" head under RVUN stations is based on the actual cost for the FY19 and FY20. The details of the cost under this head for the FY19 are being submitted as **Annexure-H**.
 20. The petitioner submits that RGTP-3 did not declare any availability in FY 2019-20 and therefore no energy was generated by the genco. Accordingly, the Discoms have not projected

any power procurement from RGTP-3 in the MYT period FY 21 to FY 24. For DCCPP, even though the plant had declared availability, the Petitioner did not procure any power in FY 2019-20 owing to high variable cost of generation from the gas based station and the plant not being scheduled as per the Merit Order Dispatch principal. Further, the Hon'ble Commission in the Tariff Order for RVUN for FY 21 has not approved any tariff for DCCPP owing to issues related to fuel availability. Hence, the Discoms have not projected any energy from DCCPP in the MYT period.

21. The petitioner submits that the negative UI cost implication was based on the provisional power purchase statement submitted earlier. Since the audited accounts are now available, the Petitioner hereby submits the power purchase statement as per audited accounts in which there is no UI total cost of energy received is not negative. The Hon'ble Commission is requested to consider the same as submitted as **Annexure-D** with the MYT formats.
22. The petitioner submits that the actual fixed and variable charges per unit incurred during the FY 2019-20 for the STPS units 1-6 have been considered for the units 7&8 for the projections of the MYT period. Unit 7 has achieved COD on 01.12.2020 while Unit 8 is expected to achieve COD by March 2021.
23. The petitioner has 2 new capacities of STPS generating plant (Unit 7 and Unit 8) as stated in the previous reply. While there are various Central Sector plants expected to come up during the MYT period, as per the data available from CEA and analysed by RUVN, energy availability from these Central Sector plants are in 'Unsure Category' owing to issues such as land acquisition, pending clearances, non-achievement of financial closure, bidding not started etc. Accordingly, the Petitioner has not considered any projections from such Central Sector plants.
24. The petitioner has considered the prevailing approved ratio of power purchase among the Discoms for the remaining MYT period and the same shall be revised according to the actuals, if revised in the coming years. The approved ratio of Power purchase is being submitted as **Annexure-I**.
25. The petitioner resubmits the required format as **Annexure-D** for the kind perusal of the Hon'ble Commission.
26. The petitioner submits the Revised Terminal benefits in the **Annexure-A** and **Annexure-D** as per the actuals of the FY 2019-20 and requests the Hon'ble Commission to kindly accept the same. Further, the actuarial valuation report is being submitted as **Annexure-J**.
27. The petitioner submits that due to a inadvertent error, the same has been submitted as Rs. 0.04/kWh instead of Rs 0.01/kWh and has submitted the revised section on Wheeling charges as **Annexure-A**. The Hon'ble Commission is requested to kindly consider the wheeling charges for 132 kV as Rs. 0.01/kWh.
28. The petitioner submits that there has been a major disruption in economic activity due to COVID and a severe dip is expected in income level of consumers as well as reduced cashflow in terms of electricity bill payments. The economic activity in the state has already witnessed

slowdown and this situation of distress is expected to continue for the entire financial year (FY 2020-21).

The deteriorated economic situation might not allow all the consumers to pay their bills and the provisioning of 5% as non-performing asset or bad debts has been taken accordingly. In order to recover pending dues from the consumers the Petitioner has been incentivising the consumers to make payments in instalments without any LPS, so that the Petitioner is able to recover maximum possible dues without them converting into bad debts. Further, it is submitted that the actual status of bad debts shall be submitted in the Trueup petition for the FY 2020-21.

29. The petitioner submits the soft copy of the revised petition is being submitted as **Annexure-A** with the corresponding revised formats as **Annexure-D** and the petitioner requests the Hon'ble Commission to kindly accept the same.
30. The petitioner has submitted the required information as **Annexure-A and D** for the kind perusal of the Hon'ble Commission.
 - The petitioner submits that the segregation of technical and commercial losses is not available and hence, the combined losses have been submitted for the kind perusal of the Hon'ble Commission.