

## **Additional Submissions on Investment Plan Petition FY 2018-19 for JVVNL**

1. The Petitioner hereby resubmits Form 2 attached as **Annexure A** showing the physical targets for various schemes for FY 2018-19.
2. The details of scheme wise physical and financial targets vis-à-vis achievements for FY 2016-17 and FY 2017-18 is hereby attached as **Annexure B**.
3. Regarding the difference in loan amount for RE works as shown in Table 3 of the Petition and the Form 3, it is submitted that the loan amount of Rs 220.95 Cr as shown in Table 3 to be released by Rural Electrification Corporation for RE works also includes the loan amount of Rs 31.29 Cr for Feeder Improvement Works. The same is shown separately in Form 3 of the Investment Plan Formats.
4. The copies of the sanction for proposed work in GoI/GoR sponsored programs like DDUGJY, IPDS, R-APDRP etc that have been received from Appropriate Government along with supporting documents showing sanction/commitment towards equity contribution, grant/subsidies and debt from financial institutions had been submitted along with the reply to the data gaps observed by the Hon'ble Commission on the Investment Plan Petition for FY 2017-18.
5. The petitioner would like to submit the ceiling limit of expenditure with detailed calculation as per clause E of RERC (Investment Approval) Regulations, 2006 along with category wise ceiling as per table provided in the regulation is given below-

Annual Plan =  $K * GFA * \{(1 + \text{Inflation Rate}) * (1 + \text{Growth Rate}) - 1\}$

Where K=constant to convert GFA at the end of previous year to current cost of assets. Till same is worked out it shall be taken as 1.30.

Inflation rate=Ratio of WPI as on 1<sup>st</sup> April of previous year and current year.

Growth rate=Growth of sales envisaged for current year over that of previous year.

Based on the above formula, the ceiling limit works out to be as under:

<b>Particulars</b>	<b>JVVNL</b>
GFA Closing FY 2017-18 (Rs Cr)	17,902.76
K	1.30
WPI 1st April'16	107.70
WPI 1st April'17	113.20
Inflation Rate (%)	5.11%
Sales FY 2017-18 (MU)	21,227.14
Sales FY 2018-19 (MU)	23,149.41
Growth Rate (%)	9.06%

Particulars	JVVNL
Plan Ceiling (Rs Cr)	3,403.75

The petitioner also submits that clause E of RERC (Investment Approval) Regulations, 2006 specifies the sub ceiling limit of expenditure of individual Schemes in the table given below. The petitioner submits detailed calculation for sub ceiling limits of individual proposed schemes as here under-

Table-C-clause No:	Category of Scheme	Scheme Particulars	Prescribed %	Calculated value/ Limit
3, 7,	Rural Electrification, Supply to Consumers	Rural Electrification Schemes	22.5%	765.84
4(a),(b),(c),(d)	Reduction of system losses, Strengthening, Augmentation, Improvement Schemes.	Sub Transmissions & Distribution Schemes, IPDS	50%	1,701.88
4(d)	System Improvement Schemes	FIP, IPDS, RAPDRP Scheme Part-B	12.5%	425.47
7	Supply to Consumers	DDUGJY	10%	340.38
5(c)	Consumer Servicing Scheme	RAPDRP Scheme Part-A	5.00%	170.19

The RGGVY XII Plan Scheme, DDUGJY and IPDS are the government flagship programs, which are partially funded by the Central Government. Looking to the size of entity, commitments of GoR, consumer satisfaction and servicing obligations, electrification of localities and releasing of new agriculture and drinking water connections, the Petitioner requests the Hon'ble Commission to consider and approve the investments made under different heads as submitted.

- As per RERC Investment Approval Regulations, 2006 the Discom needs to consider the cost benefit analysis only for the schemes of loss reduction in T & D losses, System Improvement and Capacitor installation. For all other schemes, the Discom needs to consider the LCA after giving consideration to number of consumers and available finance. Out of the schemes to be taken up based on cost benefit analysis, those having maximum benefits need to be taken up first.

In this regard it is submitted that the RERC Regulations (Investment Approval Regulations), 2006 are being complied and the Discom considering the cost benefit analysis only for the schemes of loss reduction in T & D losses, System Improvement. It is further submitted that Discom is considering, the LCA after giving consideration to number of consumers and available finance for all other schemes.

- The Hon'ble Commission has always advised the Discoms to ensure compliance of CEA (Measures relating to Safety and Electricity Supply) Regulations, 2010 and CEA (Safety requirements for construction, operation and maintenance of electrical plants and electric lines) Regulations, 2011. In this regard the Petitioner would like to submit that the safety parameters are always kept in consideration while carrying out the electrical works. It is

also submitted that while carrying out works like tightening of loose wires, replacement of obsolete cables, reconditioning of transformers, repairing of unsealed cable points, repair of non-working circuit breaker etc. it has been ensured that the provisions of safety parameters and measures are followed to the core.

Also regular directions are imparted to field officers for ensuring compliance of CEA Safety Regulations, 2010. Further in the training programs being conducted for Discom employees, the safety measures for electrical lines as per the Safety Regulation are explained in detail. The Petitioner also submits a certificate attached as **Annexure C** stating that all safety measures have been taken in the Discom area.

8. As per the MoU signed under UDAY Scheme by the Discoms certain works are to be undertaken by Discoms viz Feeder/DT metering, Feeder segregation, AMR metering, Network strengthening and implementation of ERP system etc. In this regard the Petitioner submits that works related to system strengthening, loss reduction etc are being taken up under schemes like Sub-Transmission and Distribution, RAPDRP, FIP, IPDS, DDUGJY etc. For adherence of targets set under UDAY, various officers have been designated as initiative owners for each activity for ensuring that the required activities are being completed in stipulated time and monthly monitoring of each of the activity is also done.
9. Regarding the carry forward of the approved outlay for RGGVY to DDUGJY, it is submitted that though under the provisions of DDUGJY Scheme, the existing scheme of RGGVY as approved by the CCEA for continuation in 12<sup>th</sup> and 13<sup>th</sup> Plans will get subsumed in the DDUGJY. But the same guidelines, guide not to include works already sanctioned under other GoI schemes ( like RGGVY) which already receiving / proposed to be received grants / subsidy from GoI. Therefore undergoing works of RGGVY scheme have not been included under DDUGJY.
10. Regarding the subsuming of R-APDRP into IPDS and carrying forward the approved outlay for R-APDRP to IPDS as mentioned in the Investment Plan Petition, it is submitted that although para 2.3 of Chapter-1 of the IPDS guidelines specifies the existing scheme of RAPDRP as approved by the CCEA for continuation in 12<sup>th</sup> and 13<sup>th</sup> Plans will get subsumed in the IPDS for IT enablement of Distribution sector (Part-A and SCADA projects under RAPDRP) and strengthening of distribution network (Part-B) projects under RAPDRP in the urban areas, but in para 2 (h) (i) of Chapter-2 of same guidelines, it is mentioned that the works already sanctioned under other GoI schemes ( like RAPDRP/ RGGVY / DDUGY etc) & progress for which any other grants/ subsidy from GoI has already been received/ proposed to be received shall not be eligible under this scheme. Therefore undergoing works of RAPDRP scheme will be executed under the same scheme shall not be subsumed in to IPDS.
11. In reference to the Fixed Assets Register, the Discom would like to submit that the work for preparation of the same had been awarded to M/s Ankit Maheshwari & Associates,

Jaipur for the year 2000-01 to 2012-13. The said firm has submitted the Fixed Assets Register of Kota circle which has been verified by the circle office. But considering the requirement of physical verification of the fixed assets which were not covered under the scope of the existing work order, the management has short closed the work order awarded to the mentioned firm.

Thereafter the management has decided that the work of preparation of Fixed Assets Register and physical verification will be done at its own level internally. The procedures and detailed guidelines have been issued in this regard to all circle officers and is under process.

12. The Discom would like to submit the following details pertaining to expenditure related to release of agriculture and domestic connections and the details of segregation of agriculture feeders:

Particulars	Expenditure (Rs lacs)
Per connection expenditure in release of rural domestic connection	0.08
Per connection expenditure in release of rural agriculture connection	2.07

Regarding segregation of Agriculture meters it is submitted that under DDUGJY 262 Nos. 11KV Feeders has been selected for segregation. The work of segregation on these feeders is yet to be started.

13. The Petitioner would like to resubmit Form 2,3 and 4 of the Investment Plan Formats as per the data maintained by the Petitioner attached as **Annexure A, D and E** and requests the Hon'ble Commission to consider the same. The work details of R-APDRP scheme is attached as **Annexure F**.

In Form no 4 no reactive compensation has been shown for the mentioned years. Regarding this the Petitioner would like to submit that a lump sum provision for 11K.V. reactive compensation has been considered for FY. 2016-17, FY 2017-18 and FY 2018-19 as 1.00 Cr. for each year which is a part of proposed STDP works. For LT side reactive compensation is made by installing the Super Transformers especially for Agriculture consumers which have in-built shunt capacitors and nowadays all the agriculture consumers are being fed through Super Transformers.

Regarding no purchase of HT meters it is submitted that the meter procurement is carried out after analyzing the need and requirement of specific meters depending on the status of the meters available in store, the replacement scenario of meters, the specific need for meters etc. Also the ABT compliant meters are accounted for by the consumer himself wherever required.