

Reply to Data Gaps for Investment Plan of FY 2019-20

1. The petitioner has resubmitted the **Form-2** with the physical targets proposed for FY 2019-20 as required by the Hon'ble Commission. The Petitioner requests the Hon'ble Commission to accept the same.
2. The petitioner is submitting the details of scheme wise and subhead wise physicals as well as financial targets and achievements for the FY 2017-18 and FY 2018-19 as **Annexure A**. The petitioner requests the Hon'ble Commission to accept the same.
3. The Petitioner submits that copies of the sanction for proposed work in GoI/GoR sponsored programs like DDUGJY, IPDS, R-APDRP etc. that have been received from Government along with supporting documents showing sanction/commitment towards equity contribution, grant/subsidies and debt from financial institutions have been submitted as **Annexure B**. The petitioner requests the Hon'ble Commission to accept the same.
4. The petitioner is resubmitting the **Form 2** with the updated details regarding the physical targets and the corresponding expenditure to be incurred in the FY 2019-20 and requesting the Hon'ble Commission to accept the same. The budget provision of Rs 30 Cr for the FY 2019-20 is kept under DDUGJY 12th Plan keeping in view the balance 10% grant to be obtained from the nodal agency REC that shall be released based on the submission of final closure to REC. As per fund disbursement guidelines of DDUGJY 12th plan scheme, last 10% grant is released based on closure of contract. As such since, the physical work is completed in field but submission of final closure report to close the contract shall be possible to submit to REC in the current FY closure i.e. 2019-20 therefore keeping in view the fund disbursement guidelines provision of Rs. 30 Cr is kept under budget provision.
5. The petitioner, on the guidelines of the Hon'ble Commission, have provided the details of the works done under feeder segregation in the last 3 financial years in the table provided below:

Table 1: Targets vis-à-vis Achievements of Feeder Segregation

Financial Year	Target	Achieved	Reason for slippage
2016-17	-	-	-
2017-18	75 nos.	75 nos.	-
2018-19	945 nos.	287 nos.	Priority assigned for the work of HH electrification and further due to ROW constraints and crops in field, work got delayed. Now work is in progress in full swing and likely to complete by June-19.

The petitioner states that the works of feeder segregation started in the FY 2017-18 in the discom and hence no work has been carried out in the FY 2016-17.

6. The petitioner submits that Fixed Asset Registers as on 31.03.2018 (Quantity) in respect of all Accounting units except of IT&RE, MM & Jaipur Zone have already been prepared after physical verification. Concerning Circle Accounting Offices have been advised to make valuation of such Fixed Asset details and to reconcile the same with books of accounts. The circles SEs have been advised to update such fixed assets register up to 31.03.2019. Management is constantly monitoring the progress of work of preparation of Fixed Asset Register. Further, the work relating to ERP implementation including **Assets Management Module** has been awarded to M/s Raj Comp Info Services Ltd., Jaipur vide No. 2005 dated 01.03.2019 by SE(IT), JPD, Jaipur which shall go live in the year 2019-20.
7. 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-

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

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 1st 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:

Particulars	JVVNL
GFA Closing FY 2018-19 (Rs Cr)	20,066
K	1.30
WPI 1st April'17	113.2
WPI 1st April'18	117.3
Inflation Rate (%)	3.62%
Sales FY 2018-19 (MU)	23,855
Sales FY 2019-20 (MU)	26,996
Growth Rate (%)	13.17%
Plan Ceiling (Rs Cr)	4503.49

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	Category of Scheme	Scheme Particulars	Prescribed %	Calculated Value/Limit
3, 7	Rural Electrification, Supply to Consumers	Rural Electrification Schemes	22.50%	1013.29
4(a),(b),(c),(d)	Reduction of system losses, Strengthening, Augmentation, Improvement Schemes.	Sub Transmissions & Distribution Schemes, IPDS	50%	2,251.75
4(d)	System Improvement Schemes	FIP, IPDS, RAPDRP Scheme Part-B	12.50%	562.94
7	Supply to Consumers	DDUGJY	10%	450.35
5(c)	Consumer Servicing Scheme	RAPDRP Scheme Part-A	5.00%	225.17

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.

- In the regard of cost benefit analysis, the petitioner submits that the RERC Regulations (Investment Approval Regulations), 2006 are being complied with and the Discom is taking into account the cost benefit analysis only for the schemes of loss reduction in T & D losses, System Improvement and has selected the scheme with maximum benefit with least amount of cost to assess the utility of the scheme. It is further

submitted that Discom is taking into account the LCA after considering number of consumers and available finance for all other schemes.

9. In the power distribution sector, safety plays a vital role and the Discom has always tried its best 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. The Discoms Co-ordination Forum in its meeting had already approved the specification of safety items and procedures for purchase thereof. 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. Committee of senior officers has been constituted at circle level to carry out regular inspection of 33/11 kV sub-stations and provide practical training to workers at work place, check availability of safety devices and ensure their use by workers while performing work and initiate action against defaulters.
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 certificates stating that all safety measures have been taken in the Discom area have been submitted along with the reply to data gaps as **Annexure-C** for the investment plan petition for FY 2019-20. The petitioner further submits that there has been no amount spent for compliance of safety regulations. Also, no investment, under the schemes FIP and SSIP has been done for the compliance.
10. 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 and various measures have been taken under these schemes. Some of these measures include implementing a performance monitoring and management system, 100% feeder metering, AMR metering for high value consumers, energy audit & accounting at feeder level, supply to single consumer from single DT for agriculture consumers, etc. Under RGGVY scheme (subsumed under DDUGJY) and Saubhagya Scheme an increase in specific consumption of the existing consumers due to increasing supply hours and improving living standards has been observed. 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 done.
11. The petitioner submits that work under scheme has been completed till the previous year. Though it has been proposed in FY 2019-20 because the bill pertained to previous year and will be submitted in the upcoming year by the contractor.
12. The Petitioner submits that Feeder Improvement Programme was implemented for the sake of improving quality and compliance of directives for safety as per directions of the Hon'ble Chairman Discoms vide his order NO: 16/1 issued vide Dispatch NO:36 Dated 20.06.2016 (Copy submitted as **Annexure-D**). In compliance to the order the petitioner had identified works as per **Annexure-A** of the order. Details of certain completed works having major material component up to Feb. 2019 is submitted here under-
 - a) Reconditioning of Distribution Transformers- 3 Phase-67359 Nos.
 - b) Reconditioning of Distribution Transformers- 1 Phase-34784 Nos.
 - c) Installation of Pole in Long Span for educates ground Clearance-59188 Nos.
 - d) Replacement of AB Cables- 3979.7 Km and 2818 Km.(Single and 3 Phase respectively)
 - e) Capacity augmentation of 1 Phase DTs- 11570 Nos.
 - f) Earthing on single Phase Distribution Transformers-27112 Nos.

g) Providing 3 Phase system in village near by 33 KV Sub Station-277 villages,

Petitioner further submits to kindly allow the investment provisions as allowed in it's order dated 28.05.2018 in the matter of petition Nos: 1288/17,1288/17.1289/17 in the matter of approval of Investment approval FY 19 of Rajasthan Discoms.

13. It is submitted that though under the provisions of DDUGJY Scheme, the existing scheme of RGGVY as approved by the CCEA for continuation in 12th and 13th Plans will get subsumed in the DDUGJY. However, 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.
14. The petitioner submits that, as mentioned in the Investment Plan Petition, the subsuming of R-APDRP into IPDS and carrying forward the approved outlay for R-APDRP to IPDS as mentioned in the para 2.3 of Chapter-1 of the IPDS guidelines. It specifies the existing scheme of RAPDRP as approved by the CCEA for continuation in 12th and 13th 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. Whereas 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.
15. The category wise pending number of applications as on 31st Mar. 2019 is provided in the table below:

S. No.	Category	Number of Pending applications
1	Domestic	43150
2	Non-Domestic	1893
3	Industrial	465
4	Agriculture	25972
5	PHED	552
6	Public Street Light	81
7	Mixed Load	128
	Total	72241

Since, the details could be furnished for the FY 2018-19 upto 31st March 2019, hence the Petitioner is submitting upto 31st March.

16. The petitioner submits that the Smart Metering scheme has been brought to a halt due to the orders from the Supreme Court. The work planned under the scheme will be started again as soon as the further orders from the Hon'ble court comes.
17. The petitioner is resubmitting the **Form 2** and **Annexure A** reconciled with the correct details and requests the Hon'ble Commission to accept the same.
18. The petitioner has resubmitted the updated **Form 2** and **Annexure A** and requests the Hon'ble Commission to accept the same.
19. **Form 1**
 - a.) The figure of Rs. 7.47/kWh has been derived from the projected sales and ARR for the FY20. The formula for the derivation has been submitted here under:

Sales(MU)	ARR (in Cr.)	Rate(in Rs./unit)
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27,141.13	20284.54	7.47
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Form 2

- a.) The petitioner has resubmitted the Form 2 with the required details.
- b.) The petitioner has resubmitted the Form 2 with the required details. As mentioned above in the reply that due to the orders of the Hon'ble Supreme Court, there has been a stay on the Smart Metering Project because of which the petitioner has not been able to project physical targets. The scheme RAPDRP-B has been completed.
- c.) The petitioner has resubmitted the Form-2 as in the format prescribed by the RERC Regulation, 2006.
- d.) The petitioner has resubmitted the Form 2 with the details as required by the Hon'ble Commission as requests to accept the same.

Form 3

- a.) The petitioner submits that the required details have been resubmitted in the Revised Form-3.
- b.) The petitioner submits that the required details have been resubmitted in the Revised Form-3.
- c.) The petitioner has resubmitted the Form-3 as per the RERC Regulation, 2006.

Form 4

- a.) Form 4 is being resubmitted with the required details as asked by the Hon'ble Commission.
- b.) The petitioner is resubmitting the Form 4 and submits that it was a typographical mistake.
- c.)The petitioner submits that no provision for reactive compensation has been considered because in LT side reactive compensation is made by installing the super transformers specially for Agricultural consumers which have in built shunt capacitors. And no more shunt capacitors are required as of 2019-20.
- d.) The petitioner is resubmitting the Form 4 with the number of meters proposed in the FY20 and requests the Hon'ble Commission to accept the same.
- e.) The petitioner is resubmitting the Form 4 as prescribed in the RERC Regulations, 2006, for the FY 18, 19 and 20 and requests the Hon'ble commission to accept the same.