

Table 4: Details of Public Notices published by the Commission

Sl. No.	Date	Name of Newspaper	Language	Place of Circulation
1	1 st January 2022 & 22 nd January 2022	Gomantak	Konkani	Goa
2		The Times of India	English	Goa
3		The Navhind times	English	Goa
4		oHeraldo	English	Goa

The Public Notice was published by the Petitioner in the following newspapers for inviting objections/ suggestions from the stakeholders on the Tariff Petition:

Table 5: Details of Public Notices published by the Petitioner

S. No.	Date	Name of Newspaper	Language	Place of Circulation
1.	15 th January 2022	The Navhind times	English	Goa
2.		The Times of India	English	Goa
3.		Gomantak	Marathi	Goa
4.		Bhaangar Bhuin	Konkani	Goa

1.8. Public Hearing

The COVID-19 pandemic had adversely impacted the movement of people. The guidelines of GoI had accordingly suggested avoiding of travel and gathering of people as far as possible. In view of above, the physical conduct of proceedings by the Commission was not possible. So, the Commission deemed it is necessary to provide an access to all the stakeholders by conducting proceedings remotely, by the use of audio and video enabled hearings in the matters of Petition submitted by Electricity Department, Goa. Therefore, the Commission has decided that the comments/suggestions of the stakeholders need to be heard virtually through video conferencing for seeking their opinion.

Accordingly, the Virtual Public Hearing was held on 24th January 2022 to discuss the issues, if any, related to the Petition filed by the Petitioner. The issues and concerns raised by the stakeholders in writing and as voiced by them during the Public Hearing have been examined by the Commission. The names of the stakeholders who attended the Public Hearing are provided in Annexure-I. The major issues discussed, the responses of the Petitioner thereon and the views of the Commission have been summarized in Chapter 2 of this Order.

2. Chapter 2: Summary of Suggestions/Objections received, Response from the Petitioner and the Commission's Views

2.1. Regulatory Process

On admitting the Petition, the Commission directed the Petitioner to make copies of the Petition available to the public, upload the Petition on the website and also publish the same in the newspapers in an abridged form in the given format duly inviting comments/objections from the public as per the provisions of the MYT Regulations, 2021.

The COVID-19 pandemic has adversely impacted the movement of people as per the guidelines of GoI. These guidelines have also suggested avoiding of travel and gathering of people as far as possible. In view of the above, the physical conduct of proceedings by the Commission was not possible. So, The Commission deemed it is necessary to provide an access to all the stakeholders by conducting proceedings remotely, by the use of audio and video enabled hearings in the matters of Petition submitted by the Petitioner. Therefore, the Commission decided that the comments/suggestions of the stakeholders need to be heard virtually through video conferencing for seeking their opinion.

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2.2. Suggestions/ Objections, Response of the Petitioner and Commission's Views

The Commission is appreciative of the efforts of various stakeholders in providing their suggestions/comments/observations to make the process responsive and efficient. The relevant observations of the stakeholders have been suitably considered by the Commission while finalizing this Tariff Order. The submissions of the stakeholders, response of the Petitioner and views of the Commission are summarized below:

2.2.1. Delayed response post Cyclone Tauktae in Raia Village

Stakeholder's Comment:

The Cyclone hit Goa on May 15, 2021 and parts of Raia Village were affected and were in dark for 3-4 days. Heavy infrastructure damage like falling of huge trees, electricity poles and lines has occurred, and several roads were blocked. The Village Panchayat of Raia acted swiftly and cleared the roads by 10.00 am on the same day. However, there was no JE or any staff at the Electrical Sub-Station for people of Raia to interact with the consumers.

The JE arrived the next day (Monday) at 10.00 am and again was not available in the office to guide the public on Damage Assessment and Restoration Plan. Elderly People, Covid Patients, children, etc were suffering for 3 to 4 days without electricity. After 3 days the power was restored. Still, few of the cracked poles and the sagging electrical live wires are to be repaired.

Petitioner's Response:

The cyclone "Tauktae" that hit Goa on 16/05/2021 has led to huge damage and destruction to the electrical infrastructure and the power distribution network in the entire state of Goa which affected power supply to more than 70% of the power consumers of the State.

All the Department staff were engaged in the restoration works so as to restore the power supply to the consumers at the earliest. A war room was setup to provide directions and monitor the restoration process. Prior to the cyclone, large number of local contractors were assigned for restoration works and further, more contractors were airlifted from other states to increase the pace of the work.

The temporary restoration works were completed to the extent of 70% within 48 hours and up to 95% within 72 hours and simultaneously strengthening and permanent infrastructure restoration was continued and completed.

As the entire network of the State of Goa was down due to the hit, all the departmental staffs and contractors worked round the clock to restore the power stage by stage ranging from the upstream level (i.e 33kV) to downstream level (i.e 440 V).

However, the extent of damage caused by cyclone to the Department infrastructure was massive and carrying out restoration works with only Department staff would have delayed restoration works and consequently would have delayed power supply to consumers across the State especially in remote parts. On instructions of the Minister of Power, it was therefore decided to engage the services of external contractors to carry out power restoration works. Thus, external contractors from Goa and other states were requisitioned immediately to assist the Departmental staff in the restoration works.

In view of above, allegations made by Mr. Martin Rodrigues are denied by ED Goa. It is submitted that ED-Goa is fully committed to provide timely and satisfactory services to its consumers and is striving hard to achieve.

Commission's View:

The stakeholder may note the response of the Petitioner. Further, the Commission directs the Petitioner to maintain the quality and reliability of supply as per the JERC Supply Code Regulations, 2018 and JERC Standards of Supply Regulations, 2015.

2.2.2. Problem of live sagging wire and cracked pole

Stakeholder's Comment:

The sagging live wires are between Pole no. CLR/F1/2 and the other pole towards its south (there is no number on this pole) with the distance between the poles is about. 60.00 ms. The cracked pole and the sagging live wires pose danger to human lives any moment and the same is persisting for 8 months. Kindly, resolve this problem on urgent basis.

Petitioner's Response:

ED-Goa has resolved the grievance of Mr. Martin Rodrigues raised in the Public Hearing. The cracked poles have been replaced and sagging line has been tightened. The span length between pole No. CLR/F1/2 and other poles was measured and found to be 48 m instead of 60 m as claimed by the party. However, the existing LT line was strung along an old HT pole which was present along the existing line after completing fit up of 2 pin and 4 pin cross arms and the line span is now divided into 18 m on one side and 30 m on the other.

Commission's View:

The stakeholder may note the response of the Petitioner. Further, the Commission directs the Petitioner to maintain the quality and reliability of supply as per the Electricity act,2003 and Regulations made thereunder.

2.2.3. Computation of Cross Subsidy Surcharge (CSS)

Stakeholder's Comment:

The IEX has submitted that, it has observed that the Petitioner has proposed a decrease in the energy charge (@30 paise/ unit decrease for the HT industrial category) against the tariff approved for FY 2021-22. However, while computing the CSS, an increase in the Average Billing Rate (ABR) has been considered compared to the ABR approved by the Commission in the Tariff Order for FY 2021-22, which was computed basis the electricity tariff approved for FY 2021-22. The Commission is requested to consider the impact of the proposed decrease in electricity tariff on the computation of ABR while determining the CSS, so that the effect of the proposed tariff rationalization is reflected in CSS also.

Petitioner's Response:

It is submitted that in FY 2021-22, Commission estimated total HT sales of 2178 MUs and revenue of Rs. 1268 Crores arriving of ABR of Rs. 5.82 per kWh. Further, for FY 2022-23 the Petitioner has estimated sales of 2158 MUs based on actual figures of FY 2020-21 and revised projections of FY 2021-22. Further, it is submitted that the impact of kVAh billing for HT/EHT revenue is more than envisaged in FY 2021-22, and the same has been considered in while estimating revenue of FY 2022-23, accordingly revenue for Rs. 1387 MUs has been estimated. Hence, due to increase in revenue estimated and reduction of sales estimated, the ABR of FY 2022-23 comes to Rs. 6.42 per kWh, compared to approved ABR of FY 2021-22.

Commission's View:

The Commission has determined the CSS for the FY 2022-23 based on the approved ARR. The Commission believes that the tariff should progressively reflect the cost of supply. The Commission while determining the tariff for FY 2022-23 has considered the prudent cost of the Petitioner and has accordingly determined the Open Access charges and tariff for each consumer category. The stakeholder may refer to the relevant Chapter for the detailed rationale.

2.2.4. Consideration of Tariff Policy while Computing Cross Subsidy Surcharge (CSS)

Stakeholder's Comment:

The Petitioner has not considered the proviso mentioned in the Tariff Policy to restrict the CSS to 20% of ABR in the Tariff Petitions. Such omission will restrict the ability of open access consumers to avail power to optimise their cost of power purchase

Petitioner's Response:

ED-Goa submits that as per the provision of Section 42 (2) of the Electricity Act 2003, the cross-subsidy surcharge needs to be based on the current level of cross subsidy. Accordingly, the consumers who opted for Open Access need to be charged for the compensation of current level of cross subsidy which prevailed during that period and in order to avoid the burden of the same getting passed on to the other consumers who are with the Distribution Licensee. However, The Tariff Policy 2016 restricts Cross Subsidy Surcharge at 20% of the consumer tariff, this will result in lower CSS applicable than current level of cross subsidy leading to incomplete recovery of Cross Subsidy from Open Access consumers. In this process, Open Access consumers unduly get benefited due to less cross subsidy surcharge and Industrial and commercial consumers who are subsidizing consumers, the more impact gets loaded onto the Industrial and commercial category, raising its tariff further.

Further, there is no such provision provided in JERC MYT Regulations or Open Access Regulations, therefore, in order to avoid burden on other consumers of ED-Goa, it has requested to the Commission to consider the current level of cross subsidy surcharge without any ceiling.

Commission's View:

The Commission has determined the CSS for the FY 2022-23 based on the approved ARR. The Commission while determining the tariff for FY 2022-23 has considered the prudent cost of the Petitioner and has accordingly determined the Open Access charges and tariff for each consumer category. The stakeholder may refer to the relevant Chapter for the detailed rationale.

2.2.5. Additional Surcharge on stranded power due to Open Access**Stakeholder's Comment:**

The Commission is requested to allow Additional Surcharge on stranded power due to Open Access, only when the same is demonstrated through data.

Petitioner's Response:

ED-Goa submits that there are no such Open Access Consumers in the State of Goa and the same cannot be demonstrated with data.

Commission's View:

The suggestion of the Stakeholder is noted. The Petitioner is directed to submit a report on the quarterly details of power stranded for the last 3 years along with the Petition of Tariff Determination for FY 2023-24.

2.2.6. Computation of Additional Surcharge**Stakeholder's Comment:**

It is requested that the Commission may propose a scientific methodology for additional surcharge (eg: Gujarat, Telangana, etc.) which is also aligned with the Tariff Policy. The basic premise ought to be conclusive demonstration of stranded capacity on account of open access. In the absence of any open access, the question of stranded capacity on its account does not arise.

Petitioner's Response:

ED-Goa submits that it shall be following any such methodology as approved by the Commission.

Commission's View:

The Additional Surcharge is determined in line with the Tariff Policy and the JERC MYT Tariff Regulations, 2021.

2.2.7. Fulfilment of RPO Obligations through IEX products**Stakeholder's Comment:**

IEX submitted that the Commission and the Petitioner may consider option to fulfil their RPO obligations by procuring RE power from short term market through Green-DAM and Green-TAM products available at IEX platform while assessing the power purchase of Discoms.

Petitioner's Response:

The ED-Goa submits that it has taken a note of the suggestion of IEX and EDG is aware of the facilities available at IEX. The SLDC-Goa will take a call on real time basis as and when required. However, the quantum available at GTAM is very less and unpredictable and therefore we cannot rely fully on GTAM to optimise the cost of supply as per our requirement.

Commission's View:

The stakeholder may note the Petitioner's Response. The Commission further observes that the Petitioner has proposed to procure power from the Renewable Sources to meet its RPO obligations.

2.2.8. Tariff Shock due to high revenue gap

Stakeholder's Comment:

GCCI has mentioned in the FY 2024-25, the revenue gap (based on commercial accounting) is expected to be Rs.651 Crores (24% of ARR) which may lead to tariff Shock.

Petitioner's Response:

ED-Goa submits that, as per the JERC MYT Regulations the ARR for the MYT Control Period FY 2022-23 to FY 2024-25 are projected. As per prevailing scenario, the projections were carried out for FY 2024-25, which may show the Revenue Gap of Rs.651 Cr. w.r.t revenue computed at the tariff proposed for FY 2022-23. However, the same is subjected to be revised in the respective year's ARR.

Commission's View:

The Commission has determined the Revenue gap for the FY 2022-23 based on the approved ARR. The Commission while determining the tariff for FY 2022-23 has considered the prudent cost of the Petitioner and has accordingly determined the tariff for each consumer category. The stakeholder may refer to the relevant Chapter for the detailed rationale.

2.2.9. High rate of return on equity

Stakeholder's Comment:

GCCI has submitted that Return on equity is considered as 16% (Table 5.22). Norm for ROE was fixed in the earlier year of 2000, based on bank lending rate +3%. Currently, lending rate is less than 9% and hence ROE may be calculated at 11% or 12%. For a risk-free business with captive consumers, ROE of 11% is a reasonable return. Commission is requested to revise the same.

Petitioner's Response:

EDG has considered Return on Equity is 16% per cent per annum as per the Regulations 28 of JERC MYT Regulations for MYT Control Period FY 2022-23 to FY 2024-25.

Quote

"The return on equity for the Retail Supply Business shall be allowed on the equity capital determined in accordance with Regulation 27 for the assets put to use, at the rate of sixteen (16) per cent per annum."

Unquote.

Commission's View:

The Commission has considered the rate of return on equity as per JERC MYT Regulations, 2021 for MYT Control Period from FY 2022-23 to FY 2024-25.

2.2.10. Formation of District Committee to help monitor loss reduction measures

Stakeholder's Comment:

GCCI has submitted that the AT&C loss is reported as 11.90% for FY 2021-22. This together with inter-state transmission loss of 3.35%, for WR and 7.95 for SR, total ATC loss works out to be 15.8%. Aggressive loss reduction to 9.85% is essential to avoid tariff shock. The loss reduction measures such as completion of 400 kV interstate line, associated 220 kV system and augmentation of intra state transmission and distribution lines are to be monitored and completed aggressively. Forming district committees as per section 166(5) of IE act 2003 will help in monitoring the same. The Commission is requested to recommend formation of District Committees.

Petitioner's Response:

ED-Goa submits that the Commission may take appropriate decision on this matter. However, it is suggested that since Goa is a small state so formation of one co-ordination committee will be feasible and sufficient for entire state of goa.

Commission's View:

The suggestion of the stakeholder is noted.

2.2.11. Reduction in Electricity Duty

Stakeholder's Comment:

The GCCI submitted that ED-Goa creates a fund by levy of Electricity Duty of Rs.0.70 per kWh towards capital expenditure. This amount is not fully utilised in any given year and carried over to the subsequent year. Presently the kitty has nearly Rs. 1000 Cr.. It is requested that ED-Goa provide for interest on accrued fund and treat it as income. We request JERC to recommend Govt. of Goa to reduce Electricity Duty to Rs. 0.40 per kWh.

Petitioner's Response:

Electricity Duty is basically the State Government tax levied by ED Goa as per Electricity Duty Act 1986. The Government of Goa collects Electricity Duty from all the Consumers of ED-Goa, through the electricity bill of the Consumers. Funds collected are utilised for various schemes for the development of Electrical infrastructure to ensure stability of power, development of project. Since the execution of projects takes time, funds collected during the year cannot be completely utilised in the respective year.

Commission's View:

The levy of Electricity Duty fund comes under the ambit of the Government of Goa. The Commission has no jurisdiction in the matter.

2.2.12. kVAh based Tariff for LT consumers

Stakeholder's Comment:

GCCI submitted that, in FY 2021-22, ED-Goa adopted kVAh based billing instead of kWh based for HT Consumers. Its impact is nearly 12%. It is said that kVAh billing will be extended to LT consumers. Such a move

will adversely impact economy. The tariff will indirectly increase by 10-12% as has happened in the HT Consumers who are in a position to implement corrective measure which may not be viable. We request the JERC to kindly drop any plans to extend the same for LT Consumers.

Petitioner's Response:

ED-Goa has around 1 Lakh LT Commercial Consumers and 5,000 LT Industrial consumers. Some of the meters installed for these consumer categories are capable of recording kWh reading only. KVAh reading for the all the consumers can be obtained once the old meters are replaced with the Smart/ Prepaid meters. Hence at this stage it is not feasible to get ready for implementation of KVAh based tariff for LT Industrial and Commercial categories as it involves replacement of old Meter/high financial investment.

ED-Goa is in the process of installing smart meters and the Proof of Concept (PoC) for the Smart Meter has also been carried out successfully. The kVAh based billing will be carried out for LT Commercial and LT Industrial after installation of the Smart Meters and as per directions of the Commission.

Commission's View:

The Commission shall examine the matter of introducing kVAh tariff to LT consumers post installation of the Smart Meters. Appropriate decision shall be taken in line with the provisions of the Electricity Act, 2003, the prevalent Tariff Policy and the prevalent JERC MYT Regulations.

2.2.13. Reduction in delayed payment charges

Stakeholder's Comment:

The GCCI submitted that incase the Electricity bills are not paid within the due date mentioned on the bill, delayed payment charges of two percent (2%) (Computed on daily basis on outstanding bill from the due date till date of payment) are levied on the bill amount. ED Goa proposes to continue to levy 2% per month (works out to be 27.1% per annum). Considering the current economic situation & prevailing bank interest rates of 8%, it is submitted to the JERC to reduce it to 0.5% per month cumulative which is below the working capital interest rate.

Petitioner's Response:

ED-Goa submits that it has not proposed any changes in the rate of delayed payment charges in the instant petition. The delayed payment charges of 2% is accordance with the Tariff Order dated 19th May 2020 and as approved by Commission from time to time.

Commission's View:

The Commission has considered the suggestion and accordingly has reduced the late payment surcharge to 1.5% per month.

2.2.14. Tariff on Street lighting within a compound

Stakeholder's Comment:

GCCI submitted that the Street lighting within a compound (residential complex, commercial complex etc) to be charged at residential, commercial, industrial rates etc on the basis of associated activity. Please avoid categorization of Street Lighting charges in residential Complex at Commercial rates.

Petitioner's Response:

The EDG submits that the Street lighting within a compound of residential complex, commercial complex, etc. are charged at the tariff as per the respective Category on the basis of associated activity only. In this regard, if the Consumer has any grievances, can approach the EDG.

Commission's View:

The stakeholder may note the Petitioner's response.

2.2.15. Consideration of Cold storage units as Agriculture allied Industry**Stakeholder's Comment:**

GCCI submitted that, it appears that cold storage units are purposely targeted at. Cold storage units provide 24 hrs base load with a flat load curve. It helps the utility. Cold Storage prevents wastage, extends shelf life, enhance export market. Cold Storage thus helps the economy. We kindly request that cold storage wherever it is located & used, to be considered as Agriculture allied Industry irrespective of the Sector. In this connection we are enclosing herewith the judgement of Maharashtra State Electricity Distribution Co. (MSEDCL) Consumer Grievance Redressal Forum Case No 05/2017.

Petitioner's Response:

EDG submits that cold storage is billed as per the Rate Schedule and applicable tariff category approved by Commission in Tariff Order.

Commission's View:

The suggestion of the Stakeholder is noted. The Petitioner shall continue to charge the tariff rates as per the Tariff Schedule approved by the Commission.

2.2.16. Reliability linked tariff**Stakeholder's Comment:**

In general, the business plan is a well written document, without spelling out, area wise growth, reduction in losses and improvement in reliability.

There are initiatives like GIS substation, but it will be effective only if reliability of lines is nearly 100%. Even in Panaji, there are numerous tripping which will harm GIS operation. It is suggested to ED-Goa, to declare reliable distribution areas. A reliability linked tariff will be welcome step since consumers will save on diesel.

Petitioner's Response:

ED, Goa has undertaken numerous initiatives for overall improvement of power system reliability in the state of Goa. This includes commission of new substations, conversion of overhead lines to underground system and conversion of existing conductor to High Amperage conductor. A number of new similar projects are also in pipeline and the same has been included in the Business Plan. However, Commission to take a view of tariff.

Commission's View:

The suggestion of the Stakeholder is noted. The Commission has determined the tariff for the FY 2022-23 based on the approved ARR and as per the JERC MYT Regulations, 2021. Further, the Commission in the Business Plan Order dated 31st March 2022. has also prescribed targets of reliability indices for the 3rd MYT Control Period.

2.2.17. Pumped Hydro Storage Systems (PHSS)

Stakeholder's Comment:

The high peak power due to growth in tourism, will be a huge challenge for peak power procurement. Pumped hydro storage is a green power, matured, cost effective technology for energy storage. PHSS works by storing energy in water in an upper reservoir, pumped from second reservoir at a lower elevation when there is excess power in the system. When there is demand for energy the water in the upper reservoir is released and as it falls it rotates turbines that generate power. A consultant may be appointed to study the possibility of developing pumped hydro storage systems in goa.

Petitioner's Response:

No such initiatives are to be taken in near future by Government of Goa. Further, the Pumped Hydro storage Systems are Capital intensive projects are only used for Supporting the Grid during the Peak power compensation. ED Goa is trying to sign innovative PPAs with additional support during peak hours.

Commission's View:

The Petitioner may note the Stakeholder's comment. The Commission directs the Petitioner to explore the feasibility of the proposal suggested by the stakeholder.

2.2.18. Low standards of O&M practices

Stakeholder's Comment:

The GCCI has submitted that the maintenance & Construction standards of ED are well below benchmark standards. There is no proper supervision & inspection during erection & thereafter left to the local linesman to do temporary jobs. The quality of the material/equipment also play a major role in the failures. Open distribution boxes, broken hinges, undresses wires, tilted poles, unclean insulators sparking are common occurrences. The ED should have strict material inspection facility & also carryout preventive maintenance on a regular basis. ED is already using SAP. There is a Plant Maintenance (PM) module which can be used. The repair history, material equipment used, causes of failure & remedial action taken can be updated which will help in cutting down failure rates.

Petitioner's Response:

There has been a substantial improvement in regard to the Reliability Indices and the losses in regard to the Distribution Network of ED, Goa. The figures indicate improved O&M practices. The Plant Maintenance Module of SAP is made operational for carrying out periodic O&M works related to feeders and transformers.

Nodal officers at the level of Junior Engineer are appointed for each project and the projects are directly monitored by the Office of the Superintending Engineer of the concerned circles. Quality Inspector is appointed to carry out surprise checks whilst execution of the project. Further, RECPDCL has been appointed as PMC for supervision of major projects carried out by ED, Goa. Their scope includes approving of GTP/drawings, inspection of material and supervision of onsite works.

Commission's View:

The suggestion of the Stakeholder is noted. The Stakeholder may also note the Petitioner's response. Further, the Commission has already notified SOP Regulations providing limits/timelines for various individual /overall Standard of Performance.

2.2.19. Analyzing metering data

Stakeholder's Comment:

ED-Goa already has metering at DTC's. However, the data available is not analysed. Reputed Institutes like Goa Institute of Management can be roped in to analyse the data based on which suggestions for improvement, mismatch in supply & distribution, consumption, etc can be obtained.

Petitioner's Response:

The data available through Automated Meter Reading (AMR) instrument located at each DTC is made available in the Meter Data Management (MDM) system. The data is periodically analysed for checking the loading trend of the DTC, balancing of the load, losses, lower PF cases, etc.

Commission's View:

The Stakeholder may note the Petitioner's response.

2.2.20. Audit of Annual Accounts

Stakeholder's Comment:

GCCI submitted that they congratulate the current CEE for following up & completing the ED Goa Accounts up to 2018. They were pending since FY 2012 onwards. Without audit no accounts can be verified. We understand the Audit is currently on by CAG. We request that the accounts be brought upto date so that the exact figures can be made public. We are sure that this will be completed by the current CEE.

Petitioner's Response:

ED-Goa submits that once the audit of accounts for FY 2017-18 to FY 2019-20 is completed, the respective details will be submitted to the public. Drafting of provisional accounts for FY 2020-21 is in process, upon completion the same will be submitted for CAG audit.

Commission's View:

The Commission directs the Petitioner to complete the audit of accounts up to FY 2020-21 and submit the same to the Commission along with True-up Petition within 3 months of the issuance of this Order. Further, the audit of FY 2021-22 should be completed and submitted to the Commission along with True-up Petition while filing the Tariff Petition for FY 2023-24.

2.2.21. Periodical education of customers

Stakeholder's Comment:

GCCI submitted that ED-Goa should include periodical education of Customers on issues like connected load, procedures, Energy Efficiency for flattening of load curve. Plan may include this aspect.

Petitioner's Response:

EDG submits that, continuous efforts are being taken in creating awareness and educating the people and future generations through various modes and methods provided in the following:

- Launching of Energy Conservation Mobile Van. The movable mobile Van hired for publicity consisting of a structure with message on Energy Conservation tips through a banner was conveyed to teachers and students of Government High Schools/Kendriya Vidhyalayas/Jawahar Navodaya Vidhyalayas across entire state of Goa and also energy conservation awareness material i.e. poster/sticker to schools was distributed.
- Creation of Energy Clubs by encouraging participation of young children in energy efficiency movement on Energy Saving/Conservation in Government High Schools including Kendriya Vidyalayas, Jawahar Navodaya Schools which will be selected for Model Energy Efficient Schools in the State of Goa. The Work Order has been issued to M/s LILA Digital & Environmental Solutions Pvt. Ltd. on 08/09/2020. The agency has completed online training sessions in all the 25 schools. Balance work is in progress.
- Conversion of 16 nos. of Government high Schools including 5 nos. of Kendriya Vidyalayas and 2 nos. of Jawahar Navodaya Vidyalaya to Model Energy Efficient Schools. The Work Order has been issued to M/s Energy Efficiency Services Limited, New Delhi on 21/09/2020 and the work is completed.
- Conversion of Government High School, Dona Paula to Model Energy Efficient School by replacing all existing conventional appliances as a pilot project. The Work Order had been issued to M/s Energy Efficiency Services Limited, New Delhi on 26/08/2020 and the work is completed.
- Organized Energy Conservation Week programme at Institute Menezes Braganza Conference Hall on 21/12/2021, the programme included Training to Government High
- Schools/Kendriya Vidhyalayas/Jawahar Navodaya Vidhayala Teachers w.r.t. Energy Clubs, quiz Competition for finalists, Awareness/Interactive session on Energy Conservation Building Code and Painting and quiz competition prize distribution to students w.r.t. Energy Clubs.
- Work of Implementation of DSM based Efficient Lighting Programme in the State of Goa by providing 3 nos. of 7W/9W LED Bulbs to each Registered Domestic Consumer of GED at free of cost as a step towards energy conservation. Distributed of 8,04,735 nos. of 9W LED Bulbs to 2,68,245 nos. of Consumers with estimated saving of 106 MUs of annually.

Commission's View:

The Stakeholder may note the Petitioner's response.

2.2.22. Continuous Staff training, Long-term solution for power interruption and improvement of distribution efficiency

Stakeholder's Comment:

Continuous training of engineers, Managers and administrative staff is essential. About 2% of HR expenses may be allocated to the same. There are numerous short duration transient failures & some failures in the distribution system in goa. Besides carrying out repairs & adopting "Jugad" solutions, it is necessary to carry out Root Cause Analysis (RCA) and find long term effective solution in terms of material, specification, procedure & processes by forming separate dedicated groups. It is also necessary to take up pilot projects such as HV Distribution with an objective to improve distribution efficiency.

Petitioner's Response:

EDG submits the reply in three parts provided in the following:

Training: The ED, Goa Training Centre at Ponda has been made fully functional and carries out periodic training for Technical and Clerical staff. Some of these trainings are carried out in association with reputed organizations such as RECL, NTPI and NTPC. Hands on training is also provided by reputed OEM for O&M staff. Trainings related to Safety such as Safe Practices, Use of PEEs, etc. are also provided.

Root Cause Analysis and long-term effective solution: The major cause of power interruption is due to falling of trees / branches on the overhead lines especially during the monsoon season. Further, the existing overhead system is aged and the frequent snapping of the lines causes further deteriorations effecting power supply reliability severely. The Departments has taken up numerous projects for conversion of overhead network to

under ground system across the state of Goa to include major cities and towns and also hinterlands and the coastal belts. The projects are under various stage of completions.

HV Distribution: The HV Distribution is for High Load concentrated areas wherein independent transformer is installed to supply large number of consumers located at one location. The system avoids use of long LT lines thereby reducing losses and chances of theft. The system is ideal for Metro cities wherein large cluster of consumers are located very closely. In Goa, individual transformers are provided for multi consumers complexes and single dwelling consumers are supplied through 11/0.433 KV Distribution transformer of requisite ratings.

Commission's View:

The Stakeholder may note the Petitioner's response. Further, the Commission has already notified SOP Regulations providing limits/timelines for various individual /overall Standard of Performance.

3. Chapter 3: True-up of the FY 2017-18, FY 2018-19, FY 2019-20 and FY 2020-21

3.1. Applicable provisions

The True-up of FY 2017-18 and FY 2018-19 are to be carried out as per Regulation 8 (2) of the JERC MYT Regulations, 2014:

“8. Annual Review of Performance and True-up

...

(2)After audited accounts of a year are made available, the Commission shall undertake similar exercise as above with reference to the final actual figures or the provisional actual accounts as available as per the audited accounts. This exercise with reference to audited accounts shall be called 'Truing Up'.

The Truing Up for any year will ordinarily not be considered after more than one year of 'Review'.

(3)The revenue gap/surplus, if any, of the ensuing year shall be adjusted as a result of review and truing up exercises.

(4)While approving such expenses/revenue to be adjusted in the future years as arising out of the Review and/or Truing up exercises, the Commission may allow the carrying costs as determined by the Commission of such expenses/revenue. Carrying costs shall be limited to the interest rate approved for working capital borrowings.

(5)For any revision in approvals, the licensee would be required to satisfy the Commission that the revision is due to conditions beyond its control.

(6)In case additional supply is required to be made to any particular category, the licensee may, any time during the year make an application to the Commission for its approval. The application will demonstrate the need for such additional supply of power and also indicate the manner in which the licensee proposes to meet the cost for such additional supply of power.”

Further, the True-up of FY 2019-20 and FY 2020-21 are to be carried out as per Regulation 11 of the JERC MYT Regulations, 2018:

“11. Annual Performance Review, Truing-up and tariff determination during the Control Period

11.1 The Generating Company, Transmission Licensee and Distribution Licensee shall be subject to annual performance review and truing up of expenses and revenue during the Control Period in accordance with these Regulations.

11.2 The Generating Company, Transmission Licensee and Distribution Licensee shall file an application for the annual performance review of the current year, truing up of the previous Year or the Year for which the audited accounts are available and determination of tariff for the ensuing Year on or before 30th November of each Year, in formats specified by the Commission from time to time:

Provided that the Generating Company, Transmission Licensee or Distribution Licensee, as the case may be, shall submit to the Commission information in such form as may be specified by the Commission, together with the audited accounts, extracts of books of account and such other details as the Commission may require to assess the reasons for and extent of any variation in financial performance from the approved forecast of Aggregate Revenue Requirement and Expected Revenue from Tariff and Charges.

11.3 The scope of the annual performance review, truing up and tariff determination shall be a comparison of the performance of the Generating Company, Transmission Licensee or Distribution Licensee with the approved forecast of Aggregate Revenue Requirement and Expected Revenue from Tariff and Charges and shall comprise of the following:

a) True-up: a comparison of the audited performance of the Applicant for the Financial Year for which the true up is being carried out with the approved forecast for such previous Financial Year, subject to the prudence check;

.....”

3.2. Approach for the True-up of the FY 2017-18, FY 2018-19, FY 2019-20 and FY 2020-21

Petitioner’s submission:

The Petitioner has not submitted the True-Up Petition for FY 2017-18, FY 2018-19, FY 2019-20 and FY 2020-21. Further, the Petitioner has submitted that that audit works is in progress for FY 2017-18 by CAG. The accounts for FY 2018-19 and FY 2019-20 are completed and submitted to CAG, the process of auditing is yet to start. Further the accounts of FY 2020-21 will be finalized by ED-Goa by 31st December 2021 and the same will be submitted to CAG for auditing purposes.

Commission’s analysis:

The Commission in its previous Orders had stressed upon the requirement of the audited accounts to reflect the true picture and bring in accuracy in the estimates made by the Commission. The JERC MYT Regulations, 2014 and JERC MYT Regulations, 2018 also require the licensee to file the True up along with the audited accounts in the filing.

The Commission reiterates its direction to the Petitioner to prepare and submit the audited accounts for FY 2017-18, FY 2018-19, FY 2019-20 and FY 2020-21 based on commercial principles along with the True-up Petitions by 30th November 2022.

The True-up would therefore be taken up only after submission of the audited accounts. Accordingly, the Commission has decided not to take up True-up for FY 2017-18, FY 2018-19, FY 2019-20 and FY 2020-21 in the current Order.