

RVPN's Response

2.98 The petitioner submitted that it has claimed the figures as per actuals.

Energy Transmission

Stakeholder's Comments/suggestions

2.99 The stakeholder submitted that the energy to be transmitted for the FY 2022-23 is claimed as 1,16,713 MU as against actual energy transmitted during FY 2020-21 of 83,162 MU. Further, the Commission approved the energy purchase of 83,634 MU for the DISCOM's during FY 2021-22 however, the petitioner has considered 110245 MUs for the FY 2022-23 with 33% increase. Therefore, the stakeholder requested the Commission to make reasonable assessment.

2.100 Further, the stakeholder submitted that the peak demand and energy flow for the FY 2022-23 has been taken as assessed by the 21st Energy Assessment Committee meeting dated 28.06.2019 which is very old. The assessment done at the 26th Energy assessment Committee meeting held on dated 01.07.2021 may be referred. The Stakeholder sought a copy of the same for further comment.

RVPN's Response

2.101 The petitioner has submitted the revised energy transmission details vide revised T-20, T-21 & T-22

Transmission Loss

Stakeholder's Comments/suggestions

2.102 The stakeholder submitted that the energy inflow of 84727.93 MU (T-21) during the FY 2022-23 in the RVPN system is contrary to the figure of 110245 MU (T-22) considered by RVPN. There is similar discrepancy in figures of FY 2021-22. The stakeholder sought clarification for the same.

2.103 In respect of Transmission loss calculation of 3.30%, the stakeholder submitted that the projection of energy inflow for the FY 2021-22 and FY 2022-23 is on higher side. Therefore, the stakeholder sought confirmation from DISCOM for the same.

- 2.104 Further, the stakeholder submitted that the details of energy to be transmitted for the open access consumers other than consumers of DISCOM has been left blank. The stakeholder sought clarification for the same.
- 2.105 The stakeholder submitted that the transmission loss of 3.80% as projected by RVPN is not being agreed by the DISCOMs and DISCOMs are showing losses of 5.74%. The stakeholder has sought the copy of the report submitted by the Committee constituted by Jaipur DISCOM vide order dt.04.02.2022. The stakeholder has further sought the accuracy class of inter-face meters and regular testing details of the meters as per guidelines of CEA.
- 2.106 The stakeholder submitted that the methodology adopted by RVPN for computation is not in line with the RERC MYT Regulations,2019. RVPN has excluded auxiliary consumption from the transmission losses contrary to the regulations. The stakeholder has submitted a computation of intra-state transmission loss for the FY 2020-21 & FY 2021-22 as below:

	Particulars in MU	FY 2020-21	FY 2021-22
A	Total energy availability State periphery	86,030.00	89,861.00
	Energy Drawl		
B	Gross drawl by DISCOMs	82,775.00	85,902.00
C	Gross drawl by Railways	277.00	517.00
D	Total Gross Drawl (B+C)	83,052.00	86,419.00
E	Aux at GSS	38.00	39.00
F	Net drawl by DISCOMs (B-E)	82,737.00	85,864.00
G	Net drawl by Railways	277.00	517.00
H	Total Net Drawl (F+G)	83,014.00	86,380.00
I	Energy imported by RE Generators	74.00	74.00
J	Energy imported by SGS	36.00	34.00
K	Energy delivered to DISCOMs /Railways as per RVPN (D+I+J)	83,162.00	86,527.00
L	Energy delivered to DISCOMs /Railways if Aux considered as part of RVPN (H+I+J)	83,124.00	86,488.00
M	Transmission Loss as computed by RVPN (MU) [A-K]	2,867.00	3,334.00
N	Transmission Loss as computed by RVPN (%) [M/A]	3.33%	3.71%
O	Revised Transmission loss in MU if Aux considered as part of RVPN	2,905.00	3,372.00

	Particulars in MU	FY 2020-21	FY 2021-22
	[A-L]		
P	Revised Transmission loss in % [O/A]	3.38%	3.75%

RVPN's Response

2.107 The Petitioner stated that as per Rajasthan Government decision for proper utilization of Solar power, the supply to Agriculture consumers is being arranged in two blocks in day time in number of districts instead of three blocks supply (as being done in preceding years) which is resulting in increase of loading of transmission lines, transformer in day time. Peak load for November 2021, Dec. 2021 and Jan. 2022 has increased by 8.44%, 8.996% and 8.12% as compared to respective months in previous year 2020-21. Hence, it will not be possible to achieve the projected transmission Losses of 3.31% for FY 2021-22 and 3.30% for FY 2022-23 as per Trajectory Losses approved by the Commission in the ARR and Tariff of FY 2019-20 for 5 years period.

2.108 The Petitioner submitted that provisional transmission losses are 4.78% ,4.74% & 4.71% respectively for the month of Jan. 2022, Feb.2022 & March 2022. Therefore, provisional losses for the FY 2021-22 is 3.71% and may increase during finalization of state energy accounts after revision in draws to DISCOMs figures, availability figures during the year due to revision by NRPC .Therefore, transmission losses for FY 2021-22 may be considered as 3.71% and for FY 2022-23 may be increased from targeted 3.31% to 3.80% as all districts have not been covered under two block supply till date and aforesaid data is only for 3 months after execution of two block supply.

2.109 The Petitioner submitted that the peaking demand observed was 15784 MW on 16.02.2022 for FY 2021-22. As per 28th EAC meeting, the peak energy demand and total energy assessed for FY 2022-23 is 17757 MW & 96411 MU (at RVPN periphery).

Return on Equity (RoE)

Stakeholder's Comments/suggestions

2.110 The stakeholder submitted that the approval of the GoR, for the claim of 14% ROE for the FY 2022-23 is still awaited. Therefore, the stakeholder requested the Commission to consider 2% ROE as done in previous years.

2.111 The stakeholder submitted that the Govt. of Rajasthan has not approved any RoE to the RVPN. Therefore, the Commission should not allow any RoE without approval of the Govt. of Rajasthan.

2.112 The stakeholder submitted that the approval of Govt. of Rajasthan for claiming RoE is subject to formation of InVIT & requirement of equity for SPV, if needed. Since, the approval is subject to certain conditions, RoE may not be allowed till RVPN fulfils such conditions.

RVPN's Response

2.113 The Petitioner submitted that the Approval of GoR vide letter dated 31.03.2022 for the claim of 14 % RoE has already provided in data gap reply.

Energy Transmission

Stakeholder's Comments/suggestions

2.114 The stakeholder sought the copy of MOM of the 26th Energy Assessment Committee meeting held on dated 01.07.2021.

RVPN's Response

2.115 The Petitioner submitted that as per 28th EAC meeting, the peak energy demand and total energy assessed for FY 2022-23 is 17757 MW & 96411 MU (at RVPN periphery). Copy of MOM 28th EAC has been attached.

Revenue Requirement

Stakeholder's Comments/suggestions

2.116 The stakeholder submitted that the Revenue Requirement claim of Rs. 4371.25 Cr. for the FY 2022-23 is 60% higher than approved amount of Rs. 2726.19 Cr. for the FY 2021-22. The stakeholder requested the Commission to consider only reasonable increase in this regard.

2.117 Further, the petitioner submitted that the procedure followed to arrive the main components of the ARR for the FY 2022-23 is not as per Regulations. Therefore, the stakeholder requested the Commission to take appropriate view on this matter.

2.118 The stakeholder submitted that the RVPN has not provided justification of abnormal increase (60%) on Revenue Requirement to Rs. 4371.25 Crore for FY 2022-23 against Rs. 2726.19 Crore approved by the Commission for the FY 2021-22.

RVPN's Response

2.119 The petitioner submitted that the main reason of such increase in non-consideration of ROE and other heads by the Commission during the FY 2021-22 for which review petition is already filed.

Transmission Tariff

Stakeholder's Comments/suggestions

2.120 The stakeholder submitted that the Transmission charges proposed by the petitioner is very high compared to the approved Transmission Tariff for the FY 2021-22. Therefore, the stakeholder requested the Commission only to consider reasonable increase in Transmission Tariff.

2.121 The stakeholder submitted that proposal of petitioner to effect billing of transmission charges based on monthly fixed charges based on % of sharing of annual transmission charges instead of basing it on contracted capacity is not as per Regulation 66(1) & (2). The stakeholder has requested the Commission to work out transmission charges based on contracted generation capacity and not on maximum demand.

2.122 The stakeholder submitted that procurement of electricity through open access has become costlier. Thus, increase in transmission charges for long, medium & short-term open access consumers by 38.36-38.46% is unjustified. The increase in transmission charges is an attempt to burden the industrial consumers availing power through open access and making it prohibitive for them to obtain power.

2.123 The Stakeholder has submitted that RVPN has not provided justification for abnormal increase (53%) on Transmission charges & tariff for DISCOMs, LTOA & MTOA as Rs.229.90/kW/Month for the FY 2022-23 against Rs. 150.08 kW/Month approved by the Commission for the FY 2021-22.

RVPN's Response

2.124 The Petitioner submitted that the main reason of such increase is non consideration of ROE and other heads by the Commission during FY 2021-22 for which review petition is already filed in Commission

Transmission Network

Stakeholder's Comments/suggestions

2.125 The stakeholder sought following details in regards of transmission network addition for the FY 2022-23 Projections.

- (i) Date of Schedule commissioning and Start Date for the same in respect of each project.
- (ii) Cost of each line as per project report and Completion report segregated as Hard cost and IDC.

RVPN's Response

2.126 The petitioner submitted that the complete details of under execution projects have been given with the Investment Plan petition at annexure-4. The petitioner further submitted the requisite details of all projects targeted for the FY 2022-23 for commissioning.

Project Details

Stakeholder's Comments/suggestions

2.127 The Stakeholder submitted the following in respect of various Projects:

- a. The stakeholder submitted that in respect of "Augmentation at existing 400 kV GSS Akal" it has been stated that two transformers of 500 MVA each commissioned on 23.03.2021 and 7.5.2021 and 2X315 MVA Transformer has been shown as removed. The stakeholder sought the following details in this regard –
 - i. Date of commissioning of these transformers with their cost in Hard Cost and IDC separately, reason for replacement, existing load on these transformer, current utilization status of the transformer, cumulative depreciation, and confirmation for reducing the total GFA and the capacity in the same year.

- b. The stakeholder submitted that the scheme "Installation of 3x500 MVA, 765/400kV Power Transformer (ICT-3) at 765kV GSS at Phagi along with associated bays" has been commissioned in FY 2021-22. Further, the stakeholder submitted that these three-transformers have been installed by using 1X500 MVA spare transformer. Therefore, the stakeholder requested to the Commission not to allow the addition of capacities in respect of the same for calculating the normative O&M expenses. Further, the stakeholder sought the details of the cost and total period for which it is lying as spare.
- c. The stakeholder submitted that the scheme "LILO of 132 kV S/C Dholpur (220 kV GSS)-Roopwas line at 220 kV GSS Saipau" is a dedicated line of GTPS Dholpur. Therefore, the stakeholder requested to the Commission not to allow the same as capital investment for RVPN.
- d. The stakeholder sought the following details in regards to the scheme "400 kV D/C Suratgarh TPS- Babai" – whether necessary ROW has been received & work has been started by the agency. Further, justification for increase in cost & details of recovery of LD for delay in execution has been sought by the stakeholder.
- e. The Stakeholder submitted that the schemes "220/132kV, 2x160 MVA GSS at NPH Jodhpur and 220 kV D/C overhead line from 220 kV GSS Basni (Jodhpur)" has been substantially delayed on account ROW issues. The stakeholder has sought the details in respect of the same and the requested the Commission to review whether these schemes should be allowed to be continue.
- f. The stakeholder submitted that in work of revised interconnection at Kalisindh TPS" is in respect of a dedicated transmission line belonging to RVUN. Further, the stakeholder submitted that as per APTEL decision the transmission utility has no authority to construct and maintain the dedicated transmission line. Therefore, the stakeholder requested to the Commission not to allow the same in investment plan of RVPN.

RVPN's Response

2.128 The Petitioner submitted in respect of "Augmentation at existing 400 kV GSS Akal" Hard Cost - Rs. 3078.50 Lacs and IDC- Rs. 834.2 lacs and both the removed transformer i.e. 400/220 KV 315 MVA ICT-I&II were in good condition at the time their removal

Further, the Petitioner submitted that 400/220 KV 315 MVA ICT-I removal process started from 20.10.2020 & 400/220 KV 315 MVA ICT-II removal process started from 01.11.2020. The peak load before removal process started was-

400/220 KV 315 MVA ICT-I: 299.33 MVA (23:00 hrs on dated 18.08.2020)

400/220 KV 315 MVA ICT-II: 278.98 MVA (23:00 hrs on dated 18.08.2020)

The Petitioner submitted that removed transformer have been utilised: 1st transformer at 400kV GSS Bikaner and 2nd transformer at 400kV GSS Jodhpur (New)(Kankani).

2.129 The respondent needs to be technically clear on the operation of Transformer bank, capacity and use of spare transformer in the 765kV switchyard which is clarified as under:

- i) In 765kV network, the single phase 1x500MVA Transformer is used for formation of 3-phase bank of 3x500MVA with total capacity of 1500 MVA each.
- ii) For (N-1) criteria, the Transformer bank should be readily available i.e. in operation so that once any bank of 1500 MVA is out on fault, the other two banks cater to the system conditions.
- iii) The spare 1x500MVA Transformer is installed in switchyard in such a formation that it can be put in any 3 Nos. Transformer bank in case any of Single phase 1x500 MVA Transformer becomes faulty/ burn. This is not an automatic process but it takes a manual intervention and requires 4-5 hours to make necessary change over and make necessary connections.

2.130 Therefore, the purpose and function of complete live 3 phase transformer bank and spare 1x500 MVA Transformer is completely different and the formation used & investment made by RVPN is justified and is as per notional practice adopted by all other leading utilities having 765kV Transmission sub-stations.

2.131 The Petitioner stated that as per regulation 16 (8) (d) of Regulations, 2019 (Terms and Condition for determination of Tariff), initial spares shall be capitalized as a percentage of the Plant and Machinery cost up to cut-off date, subject to the ceiling limit for transmission Substation (4%). This spare transformer having cost Rs. 2503.66 lacs with IDC is in the transmission system since commissioning i.e Jan, 2015

2.132 The Hon'ble APTEL order dated 25.03.2012 under reference is for the private generator who is opting for Intra State open access or open access generator, therefore Sec. 10 of Electricity Act., 2003 allowed construction of dedicated transmission line by generator or to be constructed by STU as per request of generator as deposit works. Dholpur (GTPS) is not an open access generator. It is owned by RVUNL (generating company) which has PPA with DISCOM of Rajasthan. Therefore, the transmission system is constructed by RVPN under Section 39 & 40 of Electricity Act., 2003. The existing 220kV S/C GTPS (Dholpur) - Bharatpur line is a power evacuation line and is the capital assets of RVPN. LILO of this line to other S/S (220KV Saipau) of RVPN will not alter any existing evacuation system. This scheme was also approved by TSPCC in its 13th meeting dated 25.11.2019. Detailed MoM of 13th TSPCC meeting is also enclosed with instant investment plan petition FY 2022-23 for reference.

2.133 220kV/132kV GSS at NPH (Jodhpur)(Upgradation) has been commissioned on 26.02.2022 with associated 220kV D/C Basni (Jodhpur)-NPH (Jodhpur) line. However, reason for delay in commissioning of the scheme is as per the followings:

1. Construction of GSS took place timely but could not be put in the system due to delay in associated line.
2. Associated line work order placed in FY 2017-18 and was scheduled to be commissioned on 28.02.2019.
3. Associated Line was delayed on account of Contractor, RoW issue with AIIMS, line passing through densely populated area etc.

Comments on ARR Petition of SLDC for FY 2022-23

SLDC Charge

Stakeholder's Comments/suggestions

2.134 The stakeholder submitted that increase in SLDC charges for long, medium & short-term open access consumers by 11.79-10.15% is unjustified. The industries are facing stiff competition in the market and a competitive tariff is required for growth of industries in the State. Hence, the stakeholder sought to reduce the SLDC charges.

RVPN's Response

2.135 The petitioner submitted that the ARR & Tariff has been claimed as per the Tariff Regulations,2019 notified by the Commission.