BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION BHUBANESWAR

IN THE MATTER OF

An Application for approval of Aggregate Revenue Requirement and Retail Supply Tariff for the financial year 2024-25, under Section 62 and other applicable provisions of the Electricity Act 2003 and in conformity with the provisions of OERC (Terms and Conditions for determination of Wheeling Tariff and Retail Supply Tariff) Regulations, 2022 and OERC (Conduct of Business) Regulation 2004.

AND

IN THE MATTER OF

TP Western Odisha Distribution Ltd (TPWODL)
Corporate Office, Burla, Sambalpur, Odisha-768017

---------TPWODL

The Humble applicant above named respectfully sheweth:

GM (RA & Strategy), TPWODL

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---------TPWODL

Affidavit verifying the application for the Revised Aggregate Revenue Requirement and Tariff Application

I, Kshirod Chandra Nanda, Son of Late Radhanath Nanda, aged about 54 years, residing at, Sambalpur, do hereby solemnly affirm and state as follows: -

I am the General Manager (RA & Strategy) of TP Western Odisha Distribution Ltd. (TPWODL), Corporate Office-Burla, Sambalpur, Odisha-768017.

That, I am authorized representative of TPWODL, the applicant in the instant case and competent to swear this affidavit for and on behalf of the licensee

The statements made above along with the annexures annexed to this application are true to the best of my knowledge and the statements made are based on information and records and I believe them to be true.

Place

Date **DEPONENT**

GM (RA & Strategy), TPWODL

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1. Executive Summary

TP Western Odisha Distribution Ltd. (TPWODL), Burla, Sambalpur, Odisha-768017 is the holder of the Distribution and Retail Supply License w.e.f. 01.01.2021, as per order of Hon'ble Commission's vide License No. OERC/Engg./2/2021/409 dt.26.03.2021 and has been carrying out the business of distribution and retail supply of electricity in nine districts of Odisha namely Sambalpur, Sundargarh, Bolangir, Bargarh, Deogarh, Nuapada, Kalahandi, Sonepur and Jharsuguda.

That, Hon'ble Commission in their Order dated 04.03.2015 in Case No. 55/2013 have revoked the Licences of NESCO, WESCO and SOUTHCO (Distribution Companies) under Section 19 of the Electricity Act, 2003. Post revocation license of Wesco Ltd, Hon'ble Commission appointed Chairman-cum-Managing Director, GRIDCO as the Administrator of WESCO utility u/s 20(1)(d) of the Act vide order dated 04.03.2015. Thereafter, in terms of Section 20 of the Act Hon'ble Commission initiated action for sale of utility of WESCO and Tata Power Company Limited (TPCL) was selected through bidding process under Section 20 (1)(a) of the Act.

As per direction of Hon'ble Commission vide letter no. OERC/RA/SALE OF WESCO-27/2019 (Vol.-III)/1394 dated 04.12.2020, GRIDCO incorporated the Operating Company namely TP Western Odisha Distribution Limited (TPWODL) to which the utility of WESCO has been vested and license of WESCO utility is transferred. Accordingly, TPWODL is the wholly owned subsidiary of GRIDCO with an authorized share capital of ₹. 1000 crore (Indian Rupee One Thousand Crore) only and paid-up capital of Rs. 5 lakh (Indian Rupee Five lakh) only. TPWODL is the Operating Company in which TPCL and GRIDCO holds 51% and 49% equity shares respectively after the completion of sale.

As per terms of RFP, reserved capital of TPWODL is ₹. 300 crore (Indian Rupee Three Hundred Crore) only upon execution of Share Acquisition Agreement, TPCL acquires 51% of the equity shares of TPWODL. Accordingly, shareholding pattern with effect from 01.01.2021 continues 51% and 49% between TPCL & GRIDCO respectively.

This submission is made by the Licensee before the Hon'ble Commission for the determination of Aggregate Annual Revenue Requirement and Retail Supply Tariffs for the Financial Year 2024-25.

Since the takeover, the Licensee has showcased remarkable achievements across various commitments as per vesting order and carve out order, reflecting a robust and transformative trajectory. Capitalization of assets has been a significant milestone, with strategic investments and financial management leading to a substantial increase in the overall value of the company's assets (Rs. 567.48 Cr. Till Q2-FY-24). The reduction of AT&C Losses to an impressive 18.28% in FY 22-23 from 32.20% in FY 20-21 (around 14% reduction) is a testament to the implementation of efficient operational practices and cutting-edge technologies. Furthermore, the successful recovery of past arrears exceeding Rs. 300 Cr. has not only bolstered the financial health of the DISCOM but has also paved the way for sustained growth.

The increase in the consumer base (total 930 MVA load added & 227817 nos. of consumers added till Mar-23) reflects a successful outreach and engagement strategy, fostering a connection between the DISCOMs and the consumers they serve. Notably, the implementation of One-Time Settlement (OTS) Scheme (Rs. 130 Cr.) has been a game changer in resolving outstanding dues, offering consumers a viable approach to settle their past period bills. Around 80,000 customers has availed this benefit.

As per segregation order, clearance of past period liabilities with permission from Hon'ble Commission was mandated. The Licensee, has cleared substantial amount during the span of 34 months. Power availability from the time of pre-vesting has improved considerably (SAIDI – 424 Hr. in FY-22 to 330 Hr. in FY-23 , SAIFI – 600 in FY-22 to 468 in FY-23) with an average duration of supply (HH:MM) – 23:21 in FY-22 to 23:26 in FY-23. Still long way to go and The Licensee is committed to fulfill the national level index in the coming years.

The Licensee took many revenue initiatives with support of all stakeholders and approval of Hon'ble Commission through which the revenue has increased from Rs. 4000 Cr. (FY-21) to more than Rs. 6000 Cr. (FY-23). With support from MNRE, Govt. of Odisha (DoE), GRIDCO & OPTCL a special scheme for implementation of PM KUSUM Component "C" here in the state of Odisha through Gross-Metering arrangement is really a revolutionary decision taken by Hon'ble Commission which will not only contribute towards increase in RE power, additional revenue to farmers but also enhance the state's GDP as well as of the nation.

With all such achievements and initiatives in addition to other achievements, Ministry of Power (GoI) has recognized TPWODL with A+ rating in 11th Annual Integrated Rating for FY 22-23.

The Licensee operates in Western part of Odisha consisting of 9 revenue districts with area of 48373 sq. km. As per legacy, the business of the licensee is dominated by HT & EHT consumption. However, due to different reasons/factors and creation of their own generation affecting the other segment like LT who are in turn cross-subsidized category. To protect the business and insulate GRIDCO through higher BSP initiatives taken through TPA (Tri-partite Agreement) sale was really beneficial for the last 2 years. Hence, the licensee was able to sustain the load of quarterly BSP Surcharge in the current year till date. However, the same scenario may not survive unless there is a requirement from consumers front and GRIDCOs surplus availability. Therefore, the licensee while projecting the revenue has not considered TPA sale in FY 24-25. Nonetheless, committed to achieve the targeted AT&C Loss.

While Odisha is a mineral rich state and has significant contribution to major mineral production at national & international level. Iron and steel, Aluminium and petroleum products account for a majority of Odisha's total exports and the government is ensuring that manufacturing units of these industries are supported. All these are power-intensive industries but their struggle is still persisting sometimes due to market scenario and sometimes due to inadvertent situations.

Looking into the above aspects and helping the industrial sector to grow further, TPWODL humbly requests the Hon'ble Commission for continuity of special schemes and concessional tariffs already in place for industries in the ensuing year in addition to other new proposals in order to increase revenue of the state and retaining the industries.

Filing of ARR Application

The Hon'ble Commission vide its Notification No. 1472-OERC/RA/RST.REGU.-36/2021 dated 20.12.2022 had brought out its New Regulation i.e. Odisha Electricity Regulatory Commission (Terms and Conditions for Determination of Wheeling Tariff and Retail Supply Tariff) Regulations, 2022 superseding the old Regulation of 2014 coming into effect from the date of their publication in the Official Gazette i.e. 23.12.2022 and to remain in force till 31.03.2028, unless otherwise reviewed/extended by the Commission.

As per the new Regulation the DISCOMs are directed to submit the different filings as per the following Timelines (as mentioned under Annexure-I of Gazette Notification).

As regards to Business Plan for the 1st Control Period for FY 2023-24 to FY 2027-28, Hon'ble Commission vide it's order dated 14th September, 2023 had accorded in principle approval to the Business Plan of all 4 DISCOMs.

As regards to CAPEX Plan, the Licensee had filed the CAPEX Plan for FY 24-25 & FY 25-26 on 30th Oct-23 and was registered as Case. No. 101 of 2023. The Hon'ble Commission has concluded the hearing on 28th Nov-23 and has reserved for order.

The licensee has considered the audited figures of FY 2022-23 and actuals till Sep-23 of current year (FY 23-24) while preparing the present ARR for FY 2024-25. However certain modifications has been adopted considering latest development and performance parameters on actual basis which may kindly be taken into record. The reasons for change/modifications are enumerated in the appropriate head in the ARR application.

Accordingly, the company in accordance with the license conditions, have calculated the total expected revenue from sale of electricity in accordance with the provisions of the OERC (Terms and Conditions for determination of wheeling tariff and Retail Supply Tariff) Regulations 2022 and hereby submitting in the foregoing paragraphs as per the following structure.

a. A statement with full details of its expected annual revenue and costs for the ensuing year FY 2024-25 for its Licensed Business along with technical, commercial, performance and financial parameters in the formats prescribed by the Hon'ble Commission.
b. Different initiatives taken & to be taken by the licensee.
c. Compliance to the directives issued by the Hon'ble Commission.
d. Statement of allocation of wheeling and retail supply cost as per provisions of OERC (Terms and Conditions for determination of Wheeling Tariff and Retail Supply Tariff) Regulations, 2022.

e. Proposal for tariff rationalisation measures.

That, the company has made certain assumptions while projecting its operations for the FY 2024-25. These projections are based upon the best estimates of the operations and prospective plans of the licensee at the time of the ARR filing. The actual ARR and the revenue figures would be different from the above estimates due to several external factors such as power purchase cost and change in consumer mix/ consumption pattern etc.

Basing upon estimated Revenue Requirement and Revenue at existing tariff, the revenue gap for current FY 2023-24 is Rs.6.76 Cr.

Revenue Gap with AT&C (18.90%)-Current Year FY 23-24	
Parameters	**Estimated (Rs. Cr.)**
Power Purchase Cost excl. BSP surcharge	5508.70
BSP surcharge	351.94
Total Power Purchase Cost	***5860.64***
Distribution Cost incl. tax on ROE	1381.61
Reasonable return on ROE after tax	107.41
Surplus carried over from past True ups	(-) 600
Sub Total	**6749.66**
Revenue from sale of power at existing tariffs	**6282.69**
Non-Tariff Income	460.21
Revenue GAP(+)/Surplus (-)	**6.76**

Similarly, the Licensee has proposed the revenue gap for FY 24-25 considering the proposed AT&C loss of 17.41% and using surplus from past true up of Rs. 371.12 Cr. The revenue gap proposed is Rs. 1.26 Cr.

Revenue Gap with AT&C (17.41%) FY 24-25	
Parameters	**Rs Cr**
Power Purchase Cost (BSP @ Rs. 3.90/ u)	4770.69
Distribution Cost incl. tax on ROE	1603.44
Reasonable return on ROE after tax	135.43
Surplus carried over from past True ups	371.12
Sub Total	**6138.45**
Revenue from sale of power at existing tariffs	**5751.16**
Non-Tariff Income	386.02
Revenue GAP(+)/Surplus (-)	1.26

That, in the above background it is worth mentioning that as of now, at existing tariffs, the company through additional sale & proposed tariff rational measures along with surplus from past true ups will meet the required ARR without any tariff hike. However, Govt support and subsidy if any shall be an additional help & will be passed on to the consumer.

i. Prayer

In the aforesaid facts and circumstances, the utility prays that the Hon'ble Commission may be pleased to:

- Take the revised ARR application and Tariff Petition on record.
- Approve the Aggregate Revenue Requirement for FY 2024-25.

  Allow additional R&M and additional A&G cost for special drive for the ensuing year FY 2024-25 out of surplus revenue generated / to be generated from current year along with efficiency gain and additional sale though proposed tariff rationalisation measures without burdening the consumer of the state assuming no increase in BST & Transmission charges.

  Allow the following Tariff rationalisation measures as proposed along with continuation of existing consumer benefit schemes:

  Continuation of:

  - Digital rebate to 4% for LT Domestic, LT GP single phase & Single-phase irrigation consumers
  - Discount of 10 paise to Domestic Rural Consumers if consumed on actual meter reading
  - Levy of CSS on RE power
  - Special tariff to steel industries at 33 kV level without having CGP
  - Continuity of Special tariff for industries having CGP with CD up to 20 MW without prior approval of GRIDCO
  - Special tariff for Existing industries having CGP with CD >20 MW with minimum offtake 80% of existing CD with TPA among GRIDCO, DISCOM & Consumer.
  - Continuation of Green Tariff Premium (GTP) mechanism.

New proposals:

- Additional Rebate of Rs.10/ - p.m. if opted E-Bill.
- Processing fee for each services as per Regulation.
- Uniform Tariff for a specific category of Consumer as per load instead of Voltage of Supply.
- Charges for Temporary Supply
- Creation of Category for Mega lift points under EHT with demand charges of Rs.250 per kVA and energy charges under graded slab method.
- Special tariff for industries those who have closed their units if reopen/starts.
- Special tariff for existing industries who have no CGP for drawl of additional power beyond CD of 10 MVA.
- Special tariff for Industries for temporary business requirement.
- Minimum offtake for the industries having CGP
- Revision of Reconnection Charges with penalty clause.
- Billing with Defective Meter. (Practice direction)
- Combined Application form replacing Form-I & Form-II
- Creation of Energy Police station.
- Assessment with LF basis in case of unauthorize use of electricity.
- Meter cost to be included in CAPEX instead of Meter rent
- Levy of DPS on electricity bills
- Pro-rata billing
- Other proposals as proposed in this application
- Allow the Licensee to submit additional documents, modify the present petition, if so required, during the proceeding of this application.

Any other relief, order or direction which the Hon'ble Commission deems fit.

2. Revenue Requirement for FY 2024-25

This section outlines the assumptions for estimation of revenue requirement for FY 2024-25.

The Distribution loss and AT&C loss trajectory on the basis of actual projected is considered in the following manner

Particulars	FY 21-22	FY 22-23	FY 23-24	FY 23-24	FY 24-25
	Actual	Actual	Proposed	Approved	Proposed
Distribution Loss	21.02%	18.40%	18.11%	18.08%	16.57%
Collection Efficiency	92.93%	100.14%	99%	99%	99%
AT&C Loss	26.60%	18.28%	18.93%	18.90%	17.41%

For the current year, the Hon'ble Commission has approved AT&C Loss of 18.90% considering EHT sale of 5352 MU including TPA sale of 2000 MU. Due to non-availability of adequate power during 1st six months of the year, TPA scheduling was only 536 MUs. Therefore, maturation of approved EHT sale may not be possible unless TPA quantum increases substantially in the coming months of the current year.

Further, the concessional tariff to CGP industries having CD up to 20 MW, who can draw double their CD without levy of overdrawal penalty was supposed to contribute towards additional sale as like of previous year. However, due to pre-condition of GRIDCO's approval on monthly basis, it became an obstacle for the industries who in turn are unwilling to avail without any business stability with such kind of piece-meal approach.

In case of HT industries, Hon'ble Commission has approved 2200 MUs for FY 23-24 with special concessional tariff for steel industries connected in 33 kV level having CD more than 1 MW has helped the licensee to retain such industries and is confident to achieve the approved sale under HT category. However, in case of LT, the Licensee has estimated consumption of 3341 MU against approval of 3332 MU with various initiatives like replacement of defective meters, enforcement activities, bill revision, resolution of disputes etc. Accordingly, in the current year T&D loss has been estimated at 18.08% in line with approved level.

Now, in line with the above and with a hope in continuance of concessional tariff to industries and MSME sector the expected sales projection & performance in the ensuing year (FY 2024-25) has been depicted below with actual of previous year (FY 2023-24), estimate for current year (FY 2023-24) as per below table:

Distribution and AT & C Loss FY 2022-23 to FY 2024-25

Particulars	FY 2022-23 (Audited)	FY 2023-24 (Rev. Estimate)	FY 2024-25 (Proposed)
Energy Sales in MU	10610	10715	9614
Energy Purchased in MU	13002	13080	11524
Overall Distribution loss%	18.40	18.08	16.57
Collection Efficiency%	100.14	99	99
AT& C loss %	18.28	18.90	17.41

The Hon'ble Commission has approved input of 13286 MU for the current year against proposal of 12800 MU by the licensee. However, the revised estimate has been considered as 13080 MU due to the reasons as explained in the above paragraphs.
However, the drawl of HT industries for 1st half of the current year is in normal trend, if the drawal of Steel Industries will continue in same pace the HT approved quantum will be achieved. Considering the actual drawl till September 2023, continuance of special concessional tariff for FY 2024-25 the Licensee has estimated distribution loss of 16.57% & AT&C loss of 17.41% for FY 2024-25.

2.1. Data Sources

The Licensee is duty bound in complying with the information requirements of the Hon'ble Commission for Aggregate Revenue Requirement and tariff for the year 2024-25. The schedule of formats submitted along with this proposal is shown in the Table of Contents. The Applicant has relied upon audited accounts of FY 2022-23 and actual till Sep-23 for compilation of data and preparation of this ARR.

The Licensee would like to submit that the input cost is the most important cost element for distribution business. For authentication of input cost, the BSP bills on the basis of scheduled energy received from the Bulk Supplier (GRIDCO) and Transmission Charges on the basis of actual energy received from OPTCL, SLDC charges received from SLDC has been taken. The Licensee expects no deviation from the schedule hence provision for deviation has not been considered in the ensuing year.

Thus, the Licensee submits that the data given are authentic and reliable for formulation of Aggregate Revenue Requirement and Tariff Application for the year 2024-25.

2.2. Sales Forecast

The Licensee has projected the consumption of different categories on the basis of past trends and consumption pattern for first six months of FY 2023-24, actual addition/reduction of loads and other important aspect of market condition. Under Domestic category around 67000 new connections have been estimated & in General purpose category around 19000 connections have been proposed. During the current year, the Licensee has taken data sanitization activities by removing the Ghost consumers from the billing fold through field verifications. Around 2 lakhs such ghost consumers have been identified so far. As a result, the total no. of consumers, as shown in T1 format, has been reduced as compared to previous year. Consumer growth under irrigation category particularly mega lift point has been envisaged during ensuing year as per mega lift scheme of Govt. of Odisha.

In absence of separate category for Irrigation under EHT category a mega lift consumer with supply voltage at EHT level with load of 13500 kVA is being billed under HT category tariff and also added under HT in the projection. The mega lift point has been energized under Kalahandi West Electrical Division. Now, in RST order FY 2023-24, Hon'ble Commission has approved all mega lift (not covered under irrigation pumping and agriculture category of the regulation points to be billed under GP category including HT & EHT without levy of demand charges and eligible for rebate of Rs.2 per unit. However, the Licensee requests Hon'ble Commission for creation of a separate category for Mega Lift under EHT with levy of Demand Charges.

Similarly, under LT category the irrigation load was 237 MW as on 31st March-22, which has increased to 269 MW as on Mar-23 and now in Sep-23 it is 273 MW, with estimated addition of around 3000 connections under LT category.

The category-wise consumption projected for FY 2024-25 has been provided in following sections.

LT Category

The utility has made all-out effort to bring the entire consumers into billing fold, for which its billing performance has increased in LT sector. The growth in the domestic category has been estimated at 5.64% during FY 2024-25. The reason of higher consumption in Domestic sector is on account of replacement of defective meters and electro-mechanical meters in the consumer premises as well as installation of new meters where consumers were availing power supply without meter.

The growth in the sales of other categories in the LT sector has been estimated in the range of 6% during FY 2024-25 considering the past trends except Irrigation & Pumping category of consumers where growth of 9% has been taken up. The irrigation growth is due to addition of loads as well as metering. So, the overall growth under LT has been considered as 6.09%.

The summary of sales projections for LT category is given in following:

Sales(MU)	FY 2022-23	FY 2023-24	FY 2024-25
Domestic including kutirjyoti	1600.408	2234	2360
General Purpose<100 kW	421.255	515	550
Specified public purpose	56.460	61	64
Irrigation	309.983	330	360
Allied Agro Activities	8.987	10.5	11
Allied Agro Industrial	2.455	2.5	3
LT Industrial	78.148	80	84
Public water works	54.903	57	60
Public Lighting	49.296	50	52
Total	**2581.984**	**3340.500**	**3544.100**

HT Category

While projecting the sales in HT Category, the Licensee had analyzed the consumption pattern of each HT consumer with contract demand of more than 1 MVA. The average sale under HT category consumers has been estimated @ 5.97% for the ensuing year and is based on the trend of the FY 2022-23 and actual load for the 1st six month of current year ending Sept'23.

Sales (MU)	FY 2022-23	1st Six Mth of FY 23-24	FY 2023-24	FY 2024-25
Large Industry	1078.484	605.078	1200.500	1297.000
Power intensive	589.091	298.649	610.000	640.000
Mini Steel	167.393	111.217	225.000	230.000

Sales (MU)	FY 2022-23	1st Six Mth of FY 23-24	FY 2023-24	FY 2024-25
Others	329.973	202.676	408.5	423
Total	**2164.941**	**1217.620**	**2444.000**	**2590.000**

The above consumption is in kWh, however, the category wise kWh vis-à-vis kVAh billing has been provided by the licensee in OERC prescribed format T-1.

During current year, in the 1st six-month, consumption reached 1217.620 MU in terms of kWh, at the same time kVAh consumption is 1249.282 MU. Now, situation has improved in some sectors like steel, cement & aluminum and the licensee expects some growth in industrial consumption. At the same time in steel sector at 33 kV level and below those who were struggling preferred migrating to Jharkhand, Chhattisgarh are keeping hope with Hon'ble Commission for stability & continuance of concessional tariff. The Licensee has also proposed continuance of the existing concessional tariff with few other schemes in its proposal to retain the industries, the Hon'ble Commission's decision in this regard may help to a larger extent. So, considering the normal trend projection for the ensuing year with additional load (considering both increase and decrease) growth as well as possibility of some new industries the utility has estimated 2590 MU for FY 2024-25. The overall growth has been taken a 5.97%.

The drawl under HT category includes drawal of M/S Linde India ltd., who is availing power supply through tripartite agreement between RSP, Linde & TPWODL from MSDS VI of RSP which is inside premises of RSP. This is the only industry which contributes around 13% of the entire HT consumption out of 1344 consumers. The CD of the consumer is 43 MVA & the Licensee has projected 344 MUs to be sold under POI category for the above consumer during ensuing year considering actual monthly drawl in the current year. In addition to same, one more tripartite agreement has been executed between RSP, TPWODL and SE Railway for power supply for their railway sliding inside the premises of RSP. The tripartite agreement has already been approved by Hon'ble Commission and railway has already executed the agreement. The consumer is being billed under EHT category at 132 kV level. So, monthly billing for the three consumers is being generated through bifurcation mechanism. M/S Linde & Railway are being billed on the basis of their consumption and thereafter M/s RSP's billing is made subtracting the quantum of consumption of above two consumers from total consumption recorded at Tarkera grid of OPTCL, which is being done through monthly meter data. With RSPs CD at 170 MVA, the drawal of other two consumers are operating at their CD. It is believed that, as Hon'ble Commission has approved the tripartite agreement in principle, due to non-possibility of direct power supply from the GRID. However, for all other purposes like increase or decrease of load the treatment should be as per terms of existing regulation. Accordingly, the load of SE Rly which executed an agreement for 12.5 MVA initially has increased the load to 18.5 MVA. Now, due to surplus generation RSP, RSP desires to delete/ modify some of the provisions/ terms of the Tri-partite agreement which was duly approved by the Hon'ble Commission earlier and hence, filed a petition before the Hon'ble Commission vide Case No. 86/ 2023 and the Order is reserved. As the terms of the TPA was in consonance with all the stakeholders, the Hon'ble Commission, while approving the TPA, has directed that the TPA shall cease if TPWODL makes any loss due to such arrangement. In such circumstances, the Licensee submits that outcome of Case No. 86/ 2023 may affect the projection of HT & EHT consumption for the ensuing year.

EHT Category

The Utility has projected 3480 MU of sales in the ensuing year analyzing the consumption pattern of each EHT consumer. While estimating EHT sale, no TPA sale has been considered. Out of 46 Nos., there are 20 nos. Railway Traction, 1 No. Megalift Connection is also availing power supply at 132 KV level but due to non-availability of tariff category, projection of sales under EHT has been made with balance 26 Nos. of consumers. The consumer availing power supply under Megalift is being billed under HT tariff as explained in earlier sections. Out of the other 26 nos., 18 nos. of industries have their own CGP. The drawal made under EHT category are mainly towards consumption of Railway, MCL, Bhusan Steel & Power, Vedanta (partially), RSP (partially) and Ultratech Cement only. Ordinance Factory Badamal has already set up it's own solar plant of 10MW for which it's drawal is very less. Others are drawing very less quantum as compared to their CD. Further, one industry is availing emergency supply where there is no applicability of demand charges.

Upto Dec-22, the drawal of RSP was normal in commensurate with its CD. However, on synchronization of 250 MW CGP, the drawal from Jan-23 onwards falls drastically. No doubt during FY 22-23, due to drawal of TPA power and intake of other EHT consumers, input of FY 22-23 was in higher trend. Considering the same trend, while approving the input of FY 23-24, the Hon'ble Commission has considered 13286 MU. From Apr-23 onwards the provision of Bi-partite sale deteriorated because of the pre-condition of prior approval of GRIDCO. Similarly, power under TPA was very less in comparison to FY 22-23.

As explained above, RSP drawal also dismal from the beginning of the year. Therefore, in such a scenario, EHT sale as approved by Hon'ble Commission may not mature for the current year. However, the Licensee is trying to compensate some of the quantum through HT. In addition to this, the DISCOM has requested GRIDCO to enhance TPA power at least for rest of the period of the financial year.

The drawal of EHT sale majorly depends upon Vedanta, JSW (Bhushan), RSP for TPWODL. Due to any behavioral changes of these industries has substantial impact on EHT sale. It is observed that Vedanta has acquired 2x600 MW power plant of Athena Chhattisgarh Power Ltd. located at Jhanjgir, Chhattisgarh, which may be operational from FY 24-25 onwards. In FY 24-25, their power requirement/ drawal pattern may vary depending upon their own generation. Therefore, the Licensee has projected EHT sale without considering TPA sale. However, surplus power of GRIDCO, if any, may be required by other industries in the ensuing year. Hence, provision of TPA sale may kindly be retained.

Following HT & EHT consumers have their own CGP for which the applicant has the risk of change in drawal pattern under Industrial category:

Sl. No	Name and address of the CPP	Unitwise capacity (MW)	Total Capacity in MW	DISCOM
1	ACC, Bargarh	2 x 15	30	TPWODL
2	Action Ispat & Power Ltd, Jharsuguda	1 x 12 1 x 25 2 x 43	123	TPWODL
3	Adhunik Metalicks Ltd, Chadrihariharpur, Rourkela	2 x 18	36	TPWODL
4	Aditya Aluminium Ltd, Lapanga, Sambalpur	5 x 150	750	TPWODL
5	Aryan Ispat & Power Ltd. Bamaloi, Sambalpur	1 x 18	18	TPWODL
6	Bhaskar Steel & Ferro Alloys Ltd, Tumkela, Bonai, Sundargarh	1 x 12	12	TPWODL
7	Bhusan Power & Steel Ltd, Thelkoloi, Sambalpur	1 x 40 1 x 60 2 x 8 3 x 130	506	TPWODL
8	Bijayananda Co-operative Sugar Mill, Bolangir	1 x 3	3	TPWODL
9	ESPL, Lahandabuda, Jharsuguda	1 x 12	12	TPWODL
10	HINDALCO, Hirakud, Sambalpur	1 x 67.5 4 x 100	467.5	TPWODL
11	MSP Metalicks Ltd, Marakuta, Jharsuguda	1 x 25	25	TPWODL
12	OCL India Ltd.(Cement) Rajgangpur, Sundargarh	2 x 27	54	TPWODL
13	OCL Iron & Steel Ltd, Rajgangpur, Sundargarh	1 x 18 1 x 35	53	TPWODL
14	Rathi Steel & Power Ltd, Sikirdi, Sambalpur now BR steel	1 x 20	20	TPWODL
15	RSP, Rourkela	6 x 25 2 x 60 2 x 18 1 x 14 1 x 6.5	326.5	TPWODL
16	Rungta Mines Ltd, Koida, Sundargarh	2 x 20	40	TPWODL
17	SCAN Steel Ltd, Rajgangpur, Sundargarh	1 x 8	8	TPWODL
18	Seven Star Steels Ltd.	1 x 8	8	TPWODL
19	Shree Ganesh Metallicks Ltd.	1 x 32	32	TPWODL
20	Shree Mahavir Ferro Alloys Ltd, Kalunga, Rourkela	1 x 13	13	TPWODL
21	Shyam Metalicks & Energy Ltd, Lapanga, Sambalpur (Formerly Shya	2 x 30 1 x 33	93	TPWODL
22	SMC Power Generation Ltd, Hirma, Jharsuguda	1 x 8 1 x 25	33	TPWODL
23	Surendra Mining Industries Pvt. Ltd.	1 x 12	12	TPWODL
24	Vedanta Aluminium Ltd, Jharsuguda	9 x 135	1215	TPWODL
25	Vedanta Aluminium Ltd, Jharsuguda (SEZ Unit)	3 X 600	1800	TPWODL
26	Vedanta Aluminium Ltd., Lanjigarh, Kalahandi	3 x 30	90	TPWODL
27	Viraj Steel & Energy Ltd., Gurupalli, Sambalpur	1 x 8 1 x 20	28	TPWODL
	Total		**5808**	

In view of the above, the summary of the category-wise sales in MUs has been shown in table below.

Sales (MU)	FY 2022-23	1st Six Mth Of FY 23-24*	FY 2023-24	FY 2024-25
LT	2581.984	1594.940	3340.500	3544.100
HT	2164.941	1217.621	2444.000	2590.000
EHT*	5862.697	2422.145	4930.000	3480.000
Total	**10609.623**	**5234.706**	**10714.500**	**9614.100**

* *Includes TPA Sale for FY 2022-23 (2932 MU incl. 80% guarantee), estimated 2500 MU incl. 80% guarantee in FY 2023-24 and no quantum proposed for FY 2024-25.*

The Hon'ble Commission has approved 5351.54 MU under EHT category, considering improved consumption pattern during last quarter of previous year. Further, concessional scheme with flat rate of Rs.4.75 per unit for drawal beyond 80% of CD (Industries having CGP can draw up to double the CD, those who are having CD up to 20 MW) also helped in increase in consumption during previous year. However, from the beginning of the current year due to pre-condition of GRIDCO's prior approval to draw upto double the CD and non-availability of adequate power under TPA, sale under EHT category declined.

In addition to above due to some additional traction load & enhancement of existing load sale under Railway traction has been estimated as 900 MU for the current year and 945 MU for ensuing year. Railway has filed petition before the Hon'ble APTEL challenging the Hon'ble Commission's decision in case no. 55 of 2016 regarding grant of deemed distribution license. The judgment for interim relief to railways before the Hon'ble APTEL is reserved. However, the licensee has projected estimated sales considering Railway as normal consumer of the Licensee.

Other than the above, new additional load/ load enhancement has also been considered for ensuing year in favor of the following industries:

a) M/S Vedanta load enhancement from 200 MVA to 300 MVA under approval stage.

b) M/S JSW (formerly Bhusan Steel & Power) from 200 MVA to 300 MVA, in principle it was approved in previous year subject to construction of 400 kV line, which is under advance stage of completion.

c) M/s OCPL new connectivity at 132 kV 5 MVA from OPGC.

2.3. Power Purchase Expenses

The power purchase expenses have been derived from the sales estimates and the distribution loss level. For the year FY 2024-25, energy input of 11524 MU has been estimated based on the estimated sale of 9614 MU with Distribution Loss of 16.57%.

Power purchase cost for the current year is continuing with BSP of 390 paise per unit, transmission charges of 24 paise per unit and SLDC charges of Rs.17.14 Lakh p.m and BSP surcharge quarterly of 30 paise per unit. During the ensuing year FY 2024-25, the licensee has estimated the power purchase cost of Rs. 4770.69 Crores with BSP @ 390 paise p.u., transmission charges @ 24 paise p.u. & SLDC charges @ Rs 17.14 lakhs per month.

The quantum of power purchase is always fluctuating considering the drawal behaviour of the CGP industries. Under TPWODL area, the CGP's have their generation capacity of 5808 MVA, due to various reasons their drawal pattern from DISCOM is varying, for which the licensee has no control. Further, they do have fixed CD and pay demand charges regularly even in case of no drawal. The applicant has made no. of attempts to get the tentative drawal from the industries, however, in response it is their constant reply that they are having their CD with the DISCOM and their drawal would be within the contract demand. In such scenario, the applicant is not able to project it's monthly requirement of power purchase. Sometimes, increase in coal price affects DISCOM's monthly drawal, because industries are immediately shifting their drawal from DISCOM.

Considering the above, Hon'ble Commission is requested to consider our revised estimated input for FY 2023-24 and may approve drawal for FY 2024-25.

SMD Projection

Considering the past record and additional load towards inclusion of industrial load under HT and proposed additional load of Vedanta (100 MVA) & Bhusan (100 MVA), continuance of concessional tariff for industries, the licensee proposes 1850 MVA as SMD for FY 2024-25. However, due to the reasons as explained in the above paragraphs, the average SMD of 1st six months of current year is 1552 MVA. The maximum SMD occurred in April 2023 as 1676 MVA. The Hon'ble Commission has approved SMD of 1860 MVA for FY 2023-24.

The Licensee submits that SMD (MVA) projections for a year are estimated based on load mix, consumption patterns and other economic policies, and restricting the SMD of the utility up-to a particular level without considering the proposal as above and imposing penalty thereof for drawl beyond the approved level, shall put the Utility with higher financial burden.

The SMD as projected is without TPA power.

2.4. Employees Expenses

Importance of Employee strength in Distribution Business

For expansion of any country's economy, development of infrastructure, and eventually improving the quality of life, electrical power is one of the greatest enablers and is a key component for economic growth. However, the distribution system in India is a total contrast to the highly sophisticated, enhanced, and modernized generation and transmission system and has become the feeblest link in the Indian power system chain. Power Distribution in India is the most important link in the entire power sector value chain. As the only interface between utilities and consumers, it is the cash register for the sector as a whole. A well-designed power distribution sector is well equipped to minimize the chance of outages or downtime, which makes it invaluable for any setting or scenario.

Hon'ble High Court of Delhi vide an Order dated November 14, 2022, has held that electricity is an essential service, of which a person cannot be deprived without cogent, lawful reason.

It is noteworthy to state that, employees of power distribution sector (viz. TPWODL) work round-the-clock to maintain resilient operations of the electricity systems so as to ensure uninterrupted power supply to all the consumers of the State. Network maintenance requires the employees to work in close proximity with each other. The metering, billing and collection (MBC) system of most DISCOMs run with manual intervention which means the DISCOM employees have to operate their services with regular public interface.

As a result, the employee cost becomes crucial for a power distribution sector. The term "employee costs" refers to the expenditure incurred by an entity towards the services performed by the employees of such an entity. In normal parlance employee costs include wages/ salaries, allowances and bonuses, paid by an employer in cash or in kind to employee in return for the work done.

TPWODL's transformational journey over the years is a compelling narrative that often highlights its evolution, challenges, successes, and adaptability which also reflects the company's ability to not only survive but thrive in the ever-changing business landscape.

This journey from January 2021 involves several stages and a series of improvements which stands as a testament to adaptability, resilience, and unwavering commitment to innovation, embracing change and challenging the status quo. Its unwavering pursuit of excellence and the willingness to reinvent itself time and time again.

In TPWODL, Human resources (HR) play a crucial role and its importance cannot be overstated. As a multifaceted department responsible for managing TPWODL's most valuable asset viz., its people. Key areas of Human Resource department are as follows:

Talent Acquisition: For recruiting and hiring the right talent for the organization ensuring that the workforce is well-qualified, diverse, and aligned with the company's goals and culture.

Employee Development: For fostering the growth and development of employees through training and development programs, performance appraisals, and career planning as well as helping in improving the skills and capabilities of the workforce, leading to a more skilled and motivated team.

Employee Retention: Implement strategies to retaining top talent which are crucial for organizational success.

Compliance and Legal Matters: For ensuring that the organization complies with labor laws, regulations, and industry standards.

Organizational Culture: In shaping and maintaining the organizational culture by creating a positive work environment that fosters teamwork, collaboration, and innovation.

Strategic Planning: To contribute to an organization's strategic planning by aligning HR practices with the company's long-term goals.

Diversity and Inclusion: In promoting diversity and inclusion within the workplace, ensuring that the organization values and harnesses the diverse perspectives and backgrounds of its employees.

Employee Health and Well-being: Implementation of programs and policies to support employee health and well-being for increased productivity, reduced absenteeism, and a more positive workplace culture.

Overall HR Department in TPWODL is very crucial for the overall success and sustainability of the organization. It is responsible for managing the human capital, ensuring compliance with laws and regulations, and contributing to the development of a positive and productive work environment. Being an effective HR department, it significantly helps

TPWODL's financial health and its ability to adapt and thrive in a dynamic business environment.

TPWODL has taken over the distribution business from erstwhile WESCO utility w.e.f. 1st Jan-21. In view of the large-scale energization of new areas either through rural electrification or due to addition of new consumers, the Utility has been restructured and reorganized by creation of new Divisions, Sub-Divisions and Sections with reinforcement of allied activities such as MRT, Energy Audit, Maintenance of Distribution Transformers and Vigilance activities.

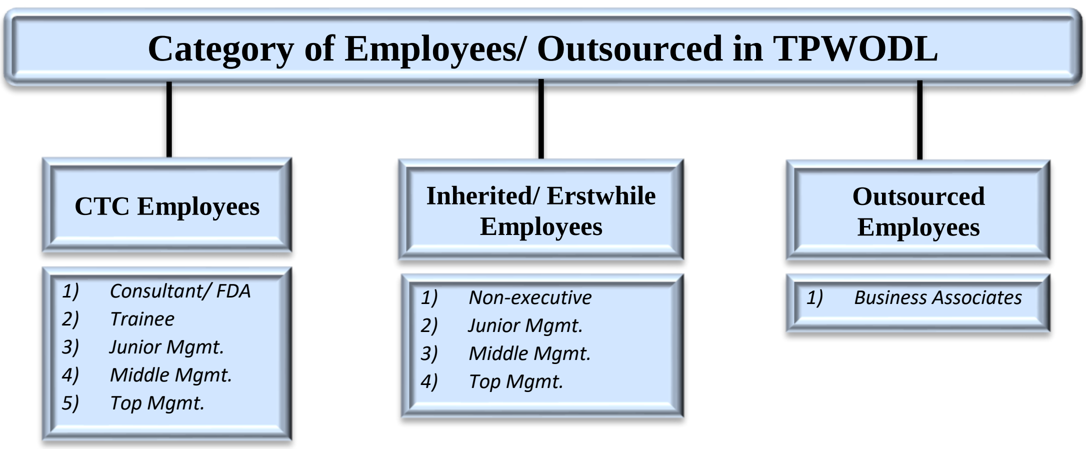
The massive shortage of manpower posed real challenge for seamless operation. TPWODL HR Team carried out detailed study of the existing manpower gaps across various departments and geographical areas spread across 48,373 sq. km and accordingly started formulating comprehensive recruitment plan for filling up the resource gaps.

A comparative analysis of the no. of employees and the no. of consumers since FY 13-14 is appended below:

S. No.	Financial Year	No. of Employees	No. of Consumers (in lakhs)
1	FY 13-14	3785	11.81
2	FY 14-15	3610	13.78
3	FY 15-16	3311	14.01
4	FY 16-17	3007	14.77
5	FY 17-18	2744	16.40
6	FY 18-19	2771	18.24
7	FY 19-20	2510	21.19
8	FY 20-21	2321	24.71
9	FY 21-22	2589	25.53
10	FY 22-23	3043	26.73

From the above table it is evident that the consumer base has increased drastically during the span of 20 years and at the same time the employee strength has reduced.

Employees in TPWODL have been categorized under 3 categories as appended below:



The Licensee has recruited 461 employees in FY 23-24 (till date) and planned for another 50 nos. of employees in FY 23-24 & 330 nos. of employees in FY 24-25 for recruitment. The proposed recruitments are in line with the employee strength benchmark of 1.4 employees per 1000 consumers as directed by the Hon'ble Commission.

The position of the employees up to the end of FY 23-24 as approved by the Hon'ble Commission and as proposed by the Licensees is shown in the following table: -

S. No.	Particulars	Approved by Hon'ble Commission	TPWODL
A	**Inherited Employees**		
1	**No. of employees as on 01.04.2022**	**2121**	**2110**
2	Add: Addition during FY 22-23	0	194
3	Less: Retirement/Expired/ Resignation during FY 22-23	109	323
4	**No. of employees as on 31.03.2023**	**2012**	**1981**
5	Add: Addition during FY 23-24	0	0
6	Less: Retirement/Expired/ Resignation during year FY 23-24	88	94
7	**No. of employees as on 31.03.2024**	**1924**	**1887**
B	**CTC Employees**		
8	**No. of employees as on 01.04.2022**	**514**	**479**
9	Add: Addition during FY 22-23	600	590
10	Less: Retirement/Expired/ Resignation during FY 22-23	31	7
11	**No. of employees as on 31.03.2023**	**1083**	**1062**
12	Add: Addition during FY 23-24	725	511
13	Less: Retirement/Expired/ Resignation during year FY 23-24	0	55
14	**No. of employees as on 31.03.2024**	**1808**	**1518**
15	**Total no. of employees including CTC**	**3732**	**3405**
16	Add: Addition during FY 24-25		330
17	Less: Retirement/Expired/ Resignation during year FY 24-25		55
C	**No. of employees as on 31.03.2025 (incl. CTC)**		**3680**

As can be seen from the above table, the Licensee is well within the limits of the total no. of employees as on 31.03.2024.

The licensee has also calculated and considered saving due to retirement during the current year as well as ensuing year, as per table indicated below:

FY	Category	Nos. of employees retiring	Saving on account of retirement (Rs lakh)
2023-24	Executive & Non-Executive	149	366.90
2024 -25	Executive & Non-Executive	55	240.00

On recruitment front, the Licensee has considered 330 nos. (180 nos. Executives and 150 Non-executives) for the ensuing year FY 24-25. The Consumer base including TD & PD as on 30th September 2023 is as follows:

S. No.	Particulars	Lakhs
1	Live Consumers as on 30th Sep 23	20.59
2	TD & PD consumers	4.60
3	Ghost consumers	2.00
4	**Total consumer base as on 30th Sep 23**	**27.19**

Excluding the Ghost consumers, the consumer base is 25.19 lakhs. So, the employee ratio per 1000 consumers is around 1.46. The Licensee has recognised around 2 lakhs Ghost consumers till 30th September 2023 which had incurred additional manpower. It is submitted that additional manpower is still required by the Licensee for identifying such ghost consumers. However, TPWODL commits to restrict its recruitment of further employees once all the Ghost consumers are removed from the billing fold. Therefore, considering the total consumer base as on 30th September 2023 (27.19 lakhs), minimum no. of employee is 3806 per 1000 consumers. It would be pertinent to mention here that TPWODL has projected 3680 employees which is around 1.353 per 1000 customer, which may kindly be approved. The no. of TD & PD and Ghost customers has been added with the live as the Licensee has to reach such consumer round the year for arrear recovery, reconnection, regularisation to bring them into billing fold, continuous watch/ enforcement to ensure non-use of energy through illegal means etc.

The estimated cost for the above recruitment plan of 330 nos. is considered as Rs.16.77 Cr. during ensuing year.

To keep the manpower cost optimized, TPWODL has been recruiting majorly trainees - Graduate Engineer Trainees, Diploma Engineer Trainees, Commercial Trainees. Effective management of employee costs is crucial for the financial stability and long-term viability of any organization, including power DISCOMs.

TPWODL has also been enhancing the capabilities of its employees by providing world class training and development, engaging employees and their families throughout the year through various programs, implementing digital platform for better employee experience, implementing good health & wellness program and also performance-oriented work culture for better customer services. The Licensee has continuously been focusing, developing, reinforcing and improvising work environment of TPWODL to ensure employees are happy and sufficiently challenged in their respective roles within the team. Also, to provide service with excellence to esteem consumers, following new departments were created:

- Sub Transmission System – STS
- Safety
- Primary Substation modernization - PSS
- Primary Substation Maintenance & testing - PSS(M&T)
- Power System Control - PSC
- Automation & SCADA
- Geographical Information System – GIS
- Communication
- Smart Metering
- Revenue Collection & Assurance
- Business Excellence
- Information Technology
- Contracts, procurement and Stores
- Revenue Recovery
- Meter Management Group
- Connection Management Group
- Enforcement Assessment Group

TPWODL has also recruited skilled manpower, mostly from State of Odisha, under various categories to strengthen the existing workforce. At present, TPWODL is recruiting basing upon Hon'ble Commissions approval i.e., 1.40 staff member per 1000 customer. However, this figure is below the permissible limit of recruitment (i.e **2.47 staff members per 1000 customers in India as per study report given by M/s Smart power India and Rockefeller Foundation in partnership with NITI Aayog in Oct-20**) which is applicable for DISCOMs based in urban area. Further, the Hon'ble Commission at para 104 of RST Order dated 23.03.2023 has held as under:

> *"104. The Commission had earlier analyzed the manpower position, retirements and number of consumers for each DISCOMs. A comparison was made regarding the manpower position vis-à-vis the consumers in each DISCOM in Odisha with that of the various DISCOMs in the country. It was found that in most of the DISCOMs of the country, the manpower position varies from **1.5 per 1000 consumers to 1.75**."*

Gender Ratio: The licensee has also ensured female participation in overall manpower and today female gender ratio is of 8% against 5% earlier.

State Domicile Ratio: The Company has recruited most of the employees who are native of Odisha and as on date we are having 88% of employees who are from Odisha.

The Tariff Regulations, 2022 stipulates the following:

> *"Employees of erstwhile DISCOMs*
> *3.9.4. The Employee Expenses such as Salary, Terminal benefit and Liabilities of erstwhile DISCOMs, shall be serviced as per terms and conditions of the Vesting Orders.*
> *3.9.5. As all the employees of erstwhile DISCOMs have been transferred to new Distribution Licensees from the effective date as per the Vesting Orders, the corresponding liabilities towards pension, gratuity, leave encashment and provident fund of such employees (the "Employees' Liabilities") have also been transferred to new Distribution Licensees.*
> *.....*
> *Employees recruited after Effective Date*
> *.....*
> *3.9.10. The expenses for the employees recruited after Effective Date shall be determined based on the formula shown below:*
> $EMP_n = EMP_{n-1} x\ (1+Index_{Escn})$
> *where,*
> *EMP_n: Employee Cost of Distribution Licensee for the ensuing year;*
> *EMP_{n-1}: Approved Employee Cost of Distribution Licensee for the year preceding ensuing year;*
> *Provided that for first year of the control period EMP_n shall mean employee expenses as approved by the Commission for the first year of the Control Period in the Business Plan;*
> $Index_{Escn} = CPI_n$
> *where,*
> *'CPI_n' (expressed in %) means the average yearly inflation of Consumer Price Index (Industrial workers) over the years for the nth year.*
> *[Source for CPI calculation: Consumer Price Index for Industrial Workers (all India) as per Labour Bureau, Government of India {Base Year: 2001=100}]*
> *Provided that CPI_n is to be computed based on the average yearly inflation derived based on the monthly Consumer Price Index for Industrial Workers (all-India) of the past three Financial Years, at the time of filing of Petition, as per the Labour Bureau, Government of India and such escalation factor so derived to be applied to Operation and Maintenance expenses of each preceding year."*

The major heads of employee expenses include salaries and wages, leave travel allowance, earned leave encashment, dearness allowance, other allowances/ bonus/ benefits and terminal benefits. Salary also includes contractual obligations towards agencies providing manpower for various services like grid maintenance, billing & meter reading, vigilance activities along with outsource obligation.

CAMPUS RECRUITMENT:

At TPWODL, we believe in promoting fresh perspectives, innovative ideas, creative thinking, quick learning skills and adaptability to changes in the workplace. In this line, we have created several job opportunities within State Domicile through Campus recruitment drive for Engineering and Diploma candidates who can readily embrace new technologies, processes and approaches and can lead to novel solutions for improvement.

LEARNING & DEVELOPMENT

Learning and development are crucial aspects of any successful organization, serving as the foundation for employee growth, skill enhancement, lowers attrition, prepares for upcoming challenges and overall company progress. At **TP Western Odisha Distribution Limited (TPWODL)**, our commitment to nurturing talent and fostering a culture of continuous learning is reflected through our comprehensive Learning & Development Initiatives. These initiatives are designed to empower employees, enhance their skills, and drive innovation, ensuring our workforce remains competitive and adaptable in today's dynamic business landscape.

The **Learning & Development initiatives** are formulated to handhold employees by providing platforms for personal and ongoing journey of discovery, growth, and development, in which an individual actively seeks to acquire new knowledge, skills, and experiences in pursuit of their learning goals. Rather than utilizing external force, equipping employees with the desired set of knowledge and skills, required to perform specific tasks or job, promotes employee's own agency and motivation to achieve the desired expectation of the Organization.

To cater this, we design several kinds of **Learning programs** like Technical/ functional Training, Behavioral/ soft skill training, Leadership development, Competency development, Induction/ Orientation programs, Refresher trainings, Safety training etc. Also, we are engaging our employees in our e-Learning platform **Gyankosh** (Powered by LinkedIn Learning) for addressing several real-time training needs.

The real Challenge for Learning and Development initiative in an organization is **to identify the gap** between the current knowledge and skills of employees, and the desired knowledge and skills required to achieve the organization's objectives. To access the same, **Training Need Identification (TNI)** for each employee of the Organization is carried out, so that the desired technological know-how may be imparted to the employee, to establish him / her as a real asset of the Organization. Hence to ensure that the desired Organizational Objective is achieved.

Training need Identification has been done at the beginning of the financial Year where inputs are being taken from the reporting officers, functions Chiefs and department Heads and as per the TNI, the quarterly **Training Calendars** were published to fill the learning gap between the need and the resources.

In **FY 22-23**, we have **achieved 5.64 average training man-days** against the target of **04 man-days** with 02 notable **Executive Development Programs** in association with renowned institutes like **IIM, Sambalpur** and **XIM University, Bhubaneswar**.

Training manual **SMILE (Strategic Model of Integrated Learning Experience)** has been launched on to streamline the Learning & Development Activities of TPWODL.

After Completion of each training programs, **Training effectiveness** of the programs is calculated in different levels considering the category of the program as per the guidelines of learning manual **SMILE** in a method of continuous **feedback, evaluation, and improvement**.

Also, in current **FY23-24**, average man-days **3.33 is already achieved** as on end of October, 2023 against the target of **04 training man-days**.

Apart from Identified programs, TPWODL is keen to conduct several benchmarking programs in this financial year in association with the reputed B'-schools of India like IIM Sambalpur, XIMB Bhubaneswar & IIPM Kansbahal. We are also associated with many reputed Training partners for exclusive training programs.

Safety being of the utmost priority, TPWODL conducting Safety programs for all the executives Felt Safety Leadership, BBS Training, Defensive Driving, Certified First-aid Training programs, Train the Trainer programs, Risk assessment techniques. Programs like L1 Safety training & BBS training also regularly conducted for BA employees (employees in third party payroll) pan DISCOM.

<u>Few highlights of notable training programs held in this year are as follows:</u>

To facilitate strengthening the strategic communication and enhancing the leadership journey of our senior leaders to the next level, **Two-Days' Certification Program on 'Strategic Communication'** was conducted in association with one of the most reputed B-Schools of India, **Xavier Institute of Management (XIM) University, Bhubaneswar** with the active participation of **25 senior dynamic cross departmental** leaders of TPWODL.

To share a deeper understanding of regulations applicable to Odisha electricity distribution system, explore the intricacies of grid codes and the technical requirements for grid connection and apply energy policies and regulations effectively & ensuring our continued compliance, **02 batches** of one-days' training program on "**Regulatory & Grid Code**" was organized covering **62 executives**.

To ensure better understanding of best practices of safety management, adapt and improve safety protocols, ensuring well-being of employees keeping pace with industry advancement, a **2-days' Safety Improvement Program focusing on 'FELT Leadership & Suraksha Sambad'** was organized to enable continual improvement in safety practices covering 54 senior employees of TPWODL in 02 batches.

In association with NDRF, Sambalpur District Administration Sambalpur & Fire Safety Dept., we have conducted '**NDRF – FAMEX & Community Awareness Program on Disaster Management'** at our Goshala Training Centre with active participation of 45 employees. Fire Safety & First-aid demonstrations were conducted in this training program.

To adapt into the evolving business environment, 06 batches of **Two-days training program on 'Agility & Ownership'** were conducted to cover our all 250 OAGs by the trainer Mrs. Sandhyarani Pal, Assistant Professor of a reputed institute **Ravenshaw University, Cuttack**.

A session on '**Prevention of Sexual Harassment (POSH)**' was organized to create awareness about POSH act and promoting a culture of respect and equality is essential for well-being and professional growth of our employees covering 330+ employees in creating TPWODL a safe and inclusive workplace environment.

The Learning & Development Initiatives of TPWODL serve as a testament to our commitment to employee growth and organizational excellence. By providing diverse and targeted learning opportunities, fostering a culture of mentorship, embracing digital learning platforms, investing in leadership development, and embracing continuous feedback, we empower our workforce to thrive in an ever-changing business landscape. Through these initiatives, we not only enhance individual skills but also cultivate a collaborative, innovative, and high-performing workforce, driving our company's success now and in the future.

EMPLOYEE LIFE-CYCLE

Significant efforts have been made for the paradigm shift in employee experience to enhance the employee satisfaction and morale.

In this endeavor, we have been successful to remove stagnations for officers by creating better growth opportunities. New departments/ Functions were created viz. Distribution

Support Function, Agriculture and Renewable Energy Department, Revenue Collection Assurance Group etc.

As employer the prime responsibility to maintain the hygiene factor is to strengthen employee life cycle and gear it to encompass every stage of an employee's experience in the company. Essentially, to keep employees motivated & support the organization with good skill set and energized workforce. For achieving target goals set by the company, it's vital to strengthen employee morale & satisfaction level with right reward and recognition programs in place & robust performance management to evaluate the efforts & avoid any biasness in system.

It is said "The Deepest Principle in human nature is the craving to be appreciated". And in the absence any Reward & Recognition Policy or practice, this principle was missing. In the last two and half years we were able to put the streamlined policy in transparent manner and kept the bar high with the practice of quarterly awards. This year we were successfully able to do the Annual reward and recognition program with recognition to the Best Circle, Best Division, Best Sub-Division and Best Section along with some remarkable individual awards for the Innovation, Operational Excellence, Safety, Female Leadership, Sustainability etc. Till date we have recognized more than 1600 employees across the circles for their remarkable work.

To reach out to the employees for their queries, grievances, concerns and ideas for Organizational improvements, HR has also been voluntarily travelling to all Circles including Division Offices, Sub-Division Offices and Sections Offices. They meet all the employees and discuss on various organizational perspectives at the workplace of employees. This is popularly known as "SAMAKSH: HR @Your Workplace". In this initiative, all the Circle and Division offices have been covered, and 21% of the total sections has also been covered.

There have also been various special initiatives for the Diversity, Equity and Inclusion. Celebration of Women's Day, Mother's Day, Raja Festival are some of them. We have also established all-women Customer Care Center at Kalibadi. While the new MOMs are continuing to receive the hamper of "TPWODL Neomama", a new initiative "Mom-to-be" has been launched. This DEI initiative has been improving team building as the female employees are given best wishes for their upcoming journey of motherhood.

Health and Wellness is one of the primary focuses of TPWODL. Accordingly, we have launched a host of employee well-being activities such as Medical Center at Sambalpur, Doctor's camp across Circles, "Lose To Win" fitness challenge etc. The Doctor has visited more than thirteen locations across covering 513 beneficiaries for their general health assessments, offer advice on preventive measures and address concerns employees have regarding their health. To take this journey forward, Annual Health Check-up facilities for all Circles through tie-up with hospitals have been initiated. 1361 employees have undergone annual health check till date and further advice on the diagnosis have been done.

1. Care for employees is core to the people strategy of TPWODL and employee related benefits are always extended to provide a healthy and safe work environment. In line with the same, Group Health Insurance Scheme (GHIS) to 1956 families of regular employees covering 9050 members, has been provided through an Insurance Company.
2. With the help of digital process TPWODL is sanctioning all Annual increments in respect of Executives/Non-executives (OSCR) without obtaining of physical "Information Sheet" from the Executives/Non-executives, after confirming the continuity of services which is a pre-requisite criteria.
3. All retired employees are being felicitated on the last date of employment and their full and final settlement is also ensured on the same day to promoting better employee satisfaction.
4. The Diploma Apprenticeship Training has been further streamlined and around 60 nos. of Diploma Engineers has been engaged in Apprenticeship Training at different locations of TPWODL. Their Performance has been evaluated in every quarter. BOPT has awarded TPWODL as Best establishment at Eastern Zone.

EMPLOYEE ENGAGEMENT:

Employee engagement is more than just a buzzword; it's the heartbeat of a thriving workplace. It encompasses the emotional commitment, enthusiasm, and dedication that employees bring to their jobs. In a world where organizations are constantly evolving, understanding the significance of employee engagement is paramount. It's the key to unlocking a motivated and high-performing workforce.

At its core, employee engagement reflects the deep connection employees feel with their work, their colleagues, and their organization. It's not just about showing up to work, but about being genuinely invested in the company's success. Engaged employees are the driving force behind innovation, productivity, and customer satisfaction.

In TPWODL, we conduct employee engagement program in four 'C' pillars viz., Celebration, Care, Connect and Coaching & Mentoring and for change management and cultural integration. In this Financial Year, we are conducting all activities which are hovering around two themes viz., Sustainability and Health & Wellness.

Following activities have been conducted during H1 of FY 24.

1. Celebration

a. **World Environment Day:** Around 349 employees participated on Sapling Plantation and placing handmade bird nest at each circle including corporate office.

b. **Raja Parba Celebration:** We dedicated this festival by conducting a volunteering event at each circle including corporate office and visiting nearby ashram (orphanage of girl children). Around 112 employees volunteered.

c. **Annual Athletics Meet 2023:** A qualifier round was conducted at all six locations (five circle and corporate). Based on the performance at qualifying round, qualifiers were finalized at each location who finally competed at the Grand Finale scheduled on 5th Nov 2023. A total of 996 employees participated in Athletics Qualifier across all locations.

d. **Kabaddi Competition:** A qualifier round was conducted at all six locations (five circle and corporate). Based on the performance at qualifying round, qualifiers were finalized at each location who finally competed at the Grand Finale scheduled on 5th Nov 2023. A total of 180 employees participated in Kabaddi Competition Qualifier across all locations.

e. **Regional Festival Celebration:** All employees celebrated regional festivals like Sambalpuri Day, Nuakhai, Biswakarma Puja, Ganesh Puja across all Circles and Corporate Office.

2. Care

Employee Health & Wellness is of utmost importance for TPWODL. Till date 1361 employees have undergone comprehensive annual health check-up, out of which 830 employees have undergone annual health check-up in first half of FY 24. Apart from this Doctor's visit across circle are also being scheduled. In this initiative 513 have benefited across 13 locations.

3. Connect

In H1 of FY 24, following employee communication events have been scheduled.

a. CEO Communication: One event covering 1500+ employees.

b. Samaksh Visit (HR at doorstep): 56 offices visited by HR (Section 42, SDO 4, Division - 5, Circle - 5)

c. Coffee with CEO: Four employees have been covered.

4. Coaching & Mentoring

51 GET (Batch 2022) have been covered. Buddy program also initiated for 112 Campus Trainees (Batch 2023). Additionally, all five SE's are undergoing mentoring program – Prerna Power Leap Mentoring Program.

INDUSTRIAL RELATION:

1. **Project UDAAN -** The TPWODL Management initiated the project UDAAN for the upgradation of technical, safety, and behavioral knowledge of the outsource contract employees working under different contractors in collaboration with Skill Development of India. This course is specified by the Power Sector Skill Council and recognized by the National Council of Vocational Education and Training (NCVERT). A total of **1126** applications were received and upon scrutiny, **573** applications were shortlisted in-house for the eligible candidates who are taking training in 09 centers in 18 batches w.e.f. 24th Jul'22 in all the 09 districts of TPWODL. After completion of **390 hours** of classroom and site training, assessment is started for the candidates from 05-11-2024.
2. **Regularization of Outsourced Manpower -** The management of TP Western Odisha Distribution Limited has initiated the process of regularization of technically qualified and experienced outsourced employees through a designed process for the post of Operation Trainee. The written test was conducted on 28th August 2022 at Bargarh and 825 eligible outsourced manpower from all nine districts of Western Odisha appeared on the test. A total of 128 candidates have been selected and joined TPWODL in this process.
3. **Engagement initiatives for BA employees**
   a) **Reward & Recognition -** R&R sessions are organized on a regular basis by the TPWODL Business Associates (BA) for their employees. In FY24, 352 BA employees were given R&R.
   b) Our BA's organizing festival celebrations with BA employees like Diwali Celebration, Vishwakarma Puja, Holi, etc.
4. **Vendors' Meet –** Organized Business Associates and Management Meet on a monthly and periodical basis to give awareness to the BAs regarding applicable acts and rules for BA development and to ensure BA Statutory Compliances for TPWODL**.**

5. The IR Team also ensures below statutory compliances for BA employees on a monthly basis:

a) Payment of Minimum wages as per notification from GoO
b) Timely disbursement of monthly salary
c) Monthly contribution of EPF and ESIC
d) BA employees accidental Policy
e) Payment of Bonus and Leave encashment.

Expenses towards Terminal Benefit

As per terms of vesting order dated December 28, 2020, issued by the Odisha Electricity Regulatory Commission (OERC), all existing employees of Wesco Utility (WESCO) have been transferred to the Licensee. Payment of terminal benefits including pension, gratuity and leave encashment to the past and existing employees will be made by the respective Trusts (WESCO Employees' Pension Fund Trust, WESCO Employees Gratuity Fund Trust and WESCO Employees Rehabilitation Fund Trust) over the eligibility period.

Considering specific clarification in TPCODL's Carve Out Order and management expectations, the Licensee has revised the accounting treatment of terminal employee liabilities to align it with TPCODL and therefore the Actuarial provisions on account of terminal dues of the erstwhile employees.

Therefore, in line with Hon'ble Commissions order & direction in the vesting order TPWODL has projected the terminal liabilities towards pension, gratuity, leave encashment etc on the basis of actual cash outgo and the projections provided for FY 23-24 and FY 24-25. The details are given in OERC Form: F-12. Therefore, the employee Terminal Benefit outgo requirement for the year FY 23-24 and FY 24-25 amounting to Rs. 152.99 Cr. and Rs.157.58 Cr. respectively may kindly be approved.

Further, as per normal practice & approval of the Hon'ble Commission, the contractual obligation of an amount of Rs. 43.71 Cr. has been estimated for the ensuing year which may kindly be approved, as like of approval made for FY 22-23 and FY 23-24.

The licensee proposed the Employee cost aggregating to Rs. 626.59 Cr. net of capitalization for FY 24-25. This also includes additional employee cost on account of new recruitment (Rs. 16.77 Cr.).

In view of the above it is humbly submitted before Hon'ble Commission to approve the proposed employee cost of **Rs. 626.59 Cr.** net of capitalization for the ensuing year.

2.5. Administrative and General Expenses

The A&G cost of the Licensee is towards, license fees, rent, rates & taxes, insurance, vehicle hire charges, consultancy charges, electricity charges, travelling & conveyance, advertisement & CSR, Meter reading billing and collection (MBC), collection cost for current including arrear, enforcement & vigilance, watch & ward, IT automation, energy audit, shifting of meters from inside to outside premises, safety and statutory requirement, audit fees and expenses, legal expenses, GIS, SCADA & data communication &maintenance cost etc.

After taking over of business, TPWODL has engaged agency circle-wise through transparent bidding process for meter reading, billing and collection activity which is the major expenditure under A&G head. Apart from above certain revenue improvement, A&G expenses like engagement of arrear collection agents and their commission, expenses of Customer Care, vigilance/enforcement activity etc has also been taken up and related cost thereof included under A&G head. O&M Expenses towards improvement of reliability, advanced operational technology like SCADA, GIS, IT automation etc. safety related expenses are also forming part of A&G.

Regulations 3.9.16 & 3.9.17 of the OERC (Terms and Conditions for Determination of Wheeling Tariff and Retail Supply Tariff) Regulations, 2022 provides as under:

> *"3.9.16. The normal A&G Expenses for each subsequent year will be determined by escalating the approved A&G Expenses (excluding additional or special A&G expense) for the previous year, at the escalation factor of 7 % to arrive at permissible A&G expenses for each year of the Control Period.*
>
> *3.9.17. The Commission, in addition to the normal A&G expenses may allow additional expenses, under this head for special measures to be undertaken by the distribution licensees which are not covered under Capital Investment plan approved by the Commission.*
>
> *Provided the Commission will undertake a prudence check before allowing such expenditure."*

The Hon'ble Commission's in their earlier orders also, is considering 7% increase over the allowable A&G expenses of the previous year. The 7% increase is taken on account of inflation on the normal A&G expenses. The Hon'ble Commission may thus kindly approve the A&G expenses for FY 2024-25 considering past trend, inflation scenario and additional requirement of the Licensee in prudence manner.

Considering the above norms of Hon'ble Commission, the licensee has projected the A&G cost for ensuing year with hike of 7% on estimated expenses of current year (FY 2023-24) and also requested for additional expenses towards specific head with detail justification as outlined in following sections.

The A&G expenses for FY 2024-25 are projected at Rs 245.87 Cr., which includes additional expenses of Rs. 41.40 Cr.

The Hon'ble Commission in the Tariff Regulation, 2022 has defined the applicable Control Period i.e. FY 2023-24 to FY 2027-28. Accordingly, the 1st year of the Control Period is FY 2023-24.

It is submitted that the since the 1st Year i.e. FY 2023-24 is not yet completed, the Licensee had projected the A&G Expenses for full year FY 2023-24 taking into account the actuals for 1st 6 months of FY 2023-24. Also, the Hon'ble Commission vide Tariff Order dated 23.03.2023 had approved the A&G expenses of Rs. 158.12 Cr. whereas the Licensee has already incurred an amount of Rs. 95.27 Cr. in the 1st 6 months of FY 2023-24 mainly on account of the activities such as Meter Reading & Collection (MBC) activity, vehicle hire and running expenses, spot billing and meter reading expenses, collection-based franchisee expenses, consultancy expenses and other administrative expenses. The Meter reading, Billing and Collection (MBC) activity agencies are engaged through the system of competitive bidding to carry out performance-based task of MBC in their assigned circles and various collection franchisees have been appointed for collection activities for which substantial amount has been spend to increase collection. Other activities include vigilance and enforcement activity where in at present 32 squads have been engaged through different agencies in all 17 divisions. As a result, substantial collection in LT has been achieved by the licensee as compared to last five years. A comparative chart is appended below for greater appreciation of Hon'ble Commission

Month wise LT Collection (Rs. Cr.)													
Financial Year	**Apr**	**May**	**Jun**	**Jul**	**Aug**	**Sep**	**Oct**	**Nov**	**Dec**	**Jan**	**Feb**	**Mar**	**Total**
2017-18	44.3	49.8	52.81	53.55	48.7	48.78	54.8	50	52.3	52.6	38.7	186.9	**733.29**
2018-19	45.6	40.6	53.98	53.31	48.9	46.22	47.9	43.7	41	43.3	38	202.9	**705.39**
2019-20	35.8	50.3	58.57	56.78	49.9	49.42	55.9	56.5	57.8	57.3	61	102.1	**691.34**
2020-21	21.4	57.7	64.26	60.3	58.8	62.8	69.6	83.3	66.6	93.9	53.7	220.3	**912.51**
2021-22	49.7	31.2	91.57	71.63	75.2	66.96	56.6	71.4	98	78.9	87.6	263.0	**1041.7**
2022-23	59.0	74.7	109.9	108.6	93.3	104.1	92.6	93.0	95.4	99.9	112.9	293.0	**1336.4**
2023-24	87.5	90.6	120.8	124.9	109.8	105.9	113.5						**753.1**

Looking into the current situation and the activities undertaken by the Licensee for increasing collection and reducing theft, the Hon'ble Commission is requested to allow Rs. 191.09 Cr. for FY 2023-24 as has been projected by the Licensee. Further to the above, the Licensee has applied an escalation factor of 7% over FY 2023-24 to arrive at the A&G expenses for FY 2024-25 of Rs. 204.46 Cr.

Regulation 3.9.17 of the Tariff Regulations, 2022 provides that the Hon'ble Commission in addition to the normal A&G expenses may allow additional expenses, for special measures to be undertaken by the DISCOMs, not covered under Capital Investment Plan, after undertaking a prudence check.

The Licensee has claimed an amount of Rs. 41.40 Cr. on account of special/ additional expenses including Energy Police Station, to improve reliability and reduce losses and to increase performance the Licensee has proposed expenses towards GIS, SCADA, Communication, OT, Data Charges and IT automation, Meter Replacement (Recurring costs other than meters), Call Centre Addnl. Cost etc.

Accordingly, the Licensee has claimed A&G expenses of Rs. 245.87 Cr. (Rs. 204.46 Cr. – normal A&G and Rs. 41.40 Cr. – Addnl. A&G) for FY 2024-25 and requests the Hon'ble Commission to approve the same.

Under A&G expenses, following additional expenses has been considered while projecting the total A&G expenses for FY 2024-25. The reason/justification and approximate cost under each head is provided in the following paragraphs:

2.5.1. Energy Audit

Energy audits are crucial for TPWODL due to several reasons. Firstly, they help identify inefficiency in energy usage, pinpointing areas where energy is being wasted. Energy Audit dept of TPWODL taken various initiatives & implementing strategies to reduce energy losses, ultimately leading to cost savings. TPWODL Energy Audit also assist in compliance with regulatory standards and environmental regulations, promoting sustainable energy practices. Overall, energy audits play a pivotal role in enhancing operational efficiency, reducing costs, and ensuring a more sustainable and reliable energy distribution system for TPWODL.

<u>The following monthly Energy audit activities are carried out in TPWODL:</u>

1. BST bill unit comparison w.r.t GRIDCO bill.
2. BST bill unit vs. 33 kV Feeder consumption.

3. EHT Consumer Consumption Comparison w.r.t BST bill unit.
4. 33 kV Feeder loss calculation.
5. Dedicated Industry audit
6. Group audit/one-to-one audit of high-value industrial consumers
7. Apartment audit of residential/commercial apartments

The following activities are under progress/plan of action:

1. Auditing of 11 kV feeders has been started in RED & RSED Division & based on GIS tagging. Proper auditing of all 11 kV Feeders under TPWODL shall be done after the completion of GIS tagging.
2. Initially TPWODL targeted DTs having a capacity of 100 kVA and above. As per GIS tagging, we have started DTR-wise loss reports under RED and RSED Division.

The present scenario of Energy Audit in TPWODL is as follows: -

Audit Particulars	Numbers	OK Metering	Audit Activity
BST Points (GRID end)	193	193	193
EHT Consumers	47	47	47
33 kV Feeder (GRID end)	192	192	151
11 kV Feeder	1177	1087	78
DTR SMART METERING	76797	2303	301

BST Points Consumption Comparison w.r.t GRIDCO Bill:				
SL NO	**Circle Name**	**No of BST Metering Points**	**No of BST consumption points checked and found ok**	**Abnormality found**
1	Rourkela Circle	44	44	0
2	Sambalpur Circle	66	66	0
3	Bargarh Circle	19	19	0
4	Bolangir Circle	36	36	0
5	Kalahandi Circle	28	28	0
	TPWODL	**193**	**193**	**0**

Transmission bill Analysis:

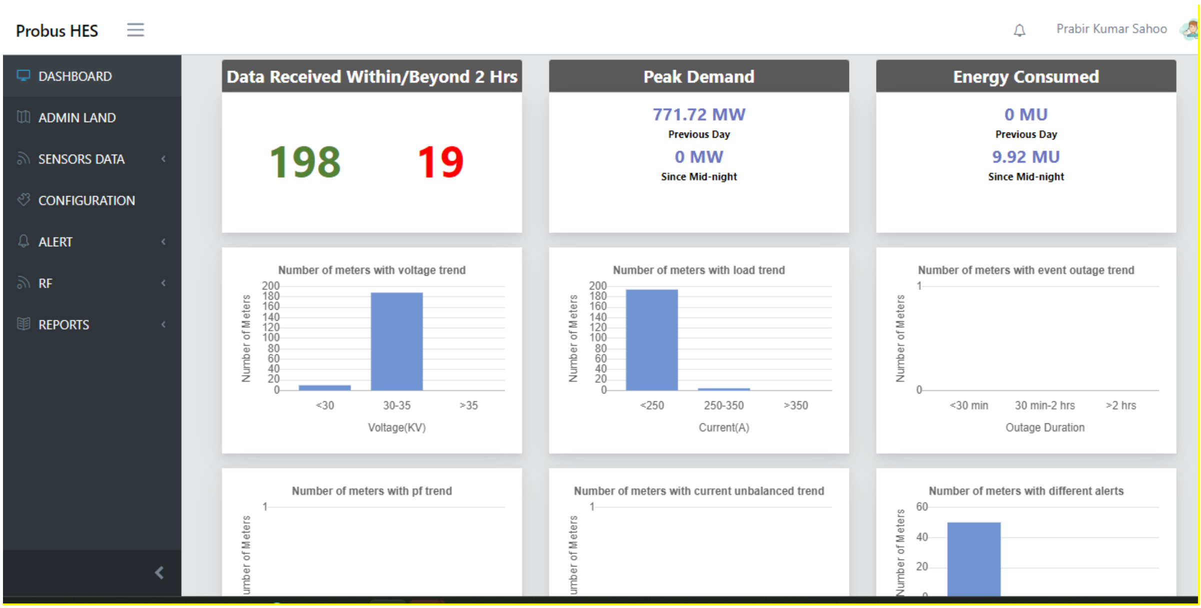
In the Transmission bill, 7 nos. of 132 kV Solar entities import units are billed by OPTCL and paid by WESCO/TPWODL though they are not Consumers of TPWODL. Whereas BST billing of GRIDCO to WESCO/TPWODL for these Solar entities has not been charged. Unit assessed 10.24 MU was intimated to OPTCL for withdrawal at their end.

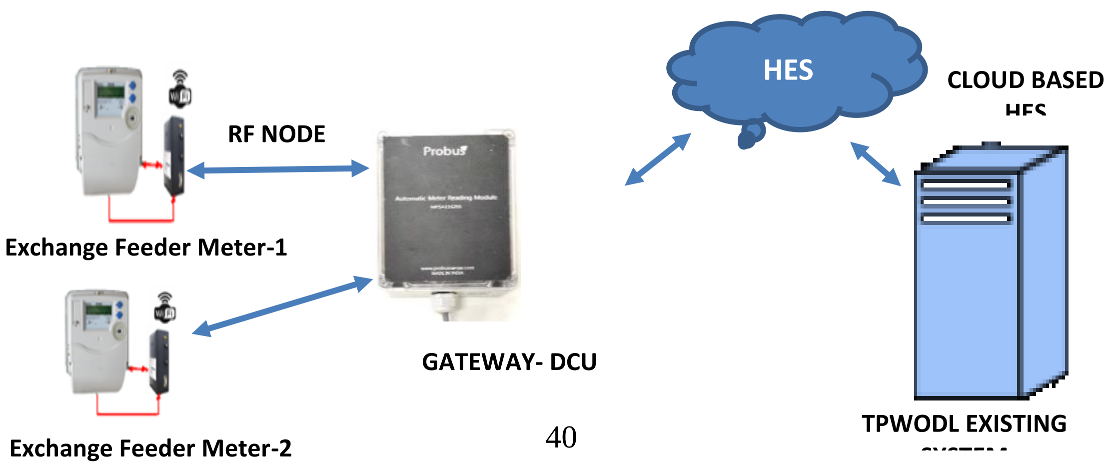
EHT Consumption vs. BST Consumption Comparison:

Name of Circle	No of EHT Consumers	Loss level
		< 0.5 %
Rourkela	13	13
Sambalpur	19	19
Bargarh	2	2
Bolangir	7	7
Kalahandi	6	6
TPWODL	**47**	**47**

33 kV Energy Audit:

Modems are now installed in every 33 kV feeder meter, allowing for seamless data transfer to the HES. This integration enables daily monitoring of feeder energy and prompts alerts concerning meter-related issues as a precautionary measure, ensuring proactive maintenance and operational efficiency. Monitoring live 33 kV feeders is facilitated by a dedicated dashboard software. The hardware, its communication with cloud-based HES, and the web-based dashboard software are visually depicted in the figure. This integrated system enables real-time monitoring and analysis for efficient operations.





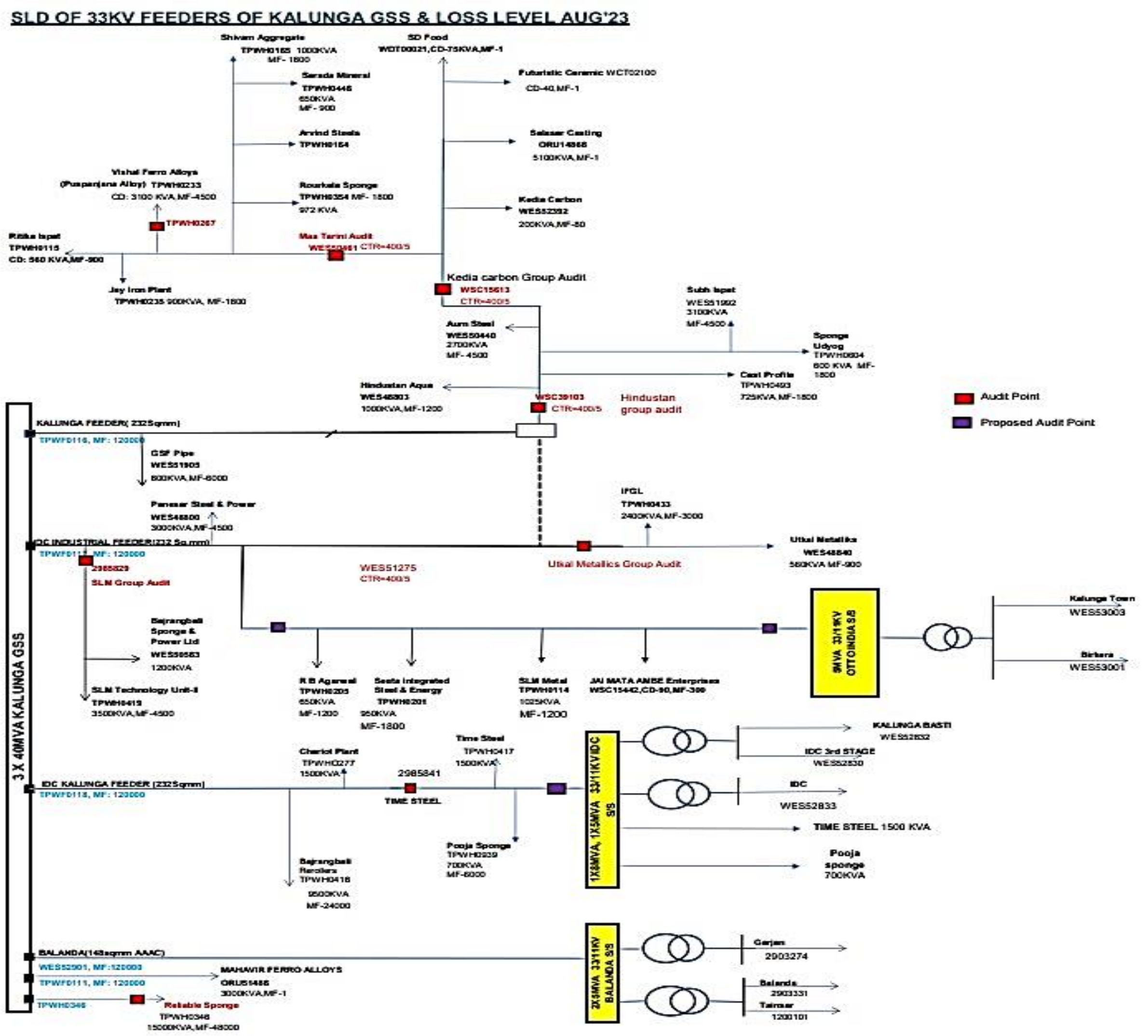
33 kV Feeder Loss of TPWODL is submitted for reference:

Abstract of Feeder Loss of 33 kV Feeders emanating directly from GRIDs							
Sl. No.	**Circle**	**Total No of 33 kV Feeders**	**No of 33 kV Feeders Audited**	**Audit Details**			
				Loss Level (<1%)	**Loss Level (1% to 3%)**	**Loss Level (3% to 4%)**	**Loss Level (4% to 8%)***
1	Rourkela	53	53	19	14	2	18
2	Sambalpur	55	34	15	4	0	15
3	Bargarh	22	19	6	10	0	3
4	Bolangir	36	9	9	0	0	0
5	Kalahandi	26	6	5	1	0	0
TPWODL		**192**	**121**	**54**	**29**	**2**	**36**

***N.B:** Loss level which are shown as >4 % is due to metering & communication issue. So, manual reading was taken & energy was prorated. The utility is in the process of Installation of AMR for Automatic reading for calculation of loss as well as reduction of Human error.

However, all 33 kV Industrial feeders of TPWODL are under the Energy Audit. Apart from the above, group audit meters have also been installed against groups of industries and the energy loss is monitored to check pilferage if any.

Also, in industrial areas for high-value large industries, audit metering units are being installed for one-to-one & group auditing purposes. Monthly audits are being carried out to find the loss unit and strengthen surveillance activities.



The 33 kV industry audit report of TPWODL is attached herewith for reference:

Voltage Level	Type Of Audit	No Of Audit Points	No Of Consumer Covered	Units Audited (MU)	Loss Level (Audit Point)		
					≤1%	1% to 2%	>2%*
33 kV	Dedicated	28	28	24.11	21	2	4
	Individual	34	34	53.75	24	2	2
	Group	24	67	58.51	14	3	4
TOTAL		**86**	**129**	**136.37**	**59**	**7**	**10**

* The highest losses of 71.75% observed in Ghumer feeder with 2.871MU energy under Titlagarh Division of Bolangir Circle.

HT-LT Comparison Analysis Report:

We have installed approx. 1200 no of Smart Meters on LT side in Large & Medium category of HT supply consumers in addition to HT Meters for energy auditing purposes. HT -LT comparison statements are generated every month through the Energy Audit Application Module. If the loss level is high, checking and testing are carried out by the respective MMG

/ Enforcement. According to the loss level, additional units are billed to consumer to recover the revenue loss of DISCOM.

The abstract of the HT-LT Comparison sheet is as follows:

ABSTRACT OF HT- LT COMPARISON OF TPWODL					
Sl. No.	**Circle Name**	**No of Consumers Covered**	**Loss Level (< 1%)**	**Loss Level (1%to3%)**	***Loss Level (≥ 3 %)**
1	Rourkela	257	227	23	7
2	Sambalpur	91	79	8	4
3	Bargarh	198	164	24	10
4	Bolangir	192	165	23	4
5	Kalahandi	45	38	7	0
	TPWODL	**783**	**673**	**85**	**25**

*The highest losses of 18% observed in M/S Bhagawati Re-roller Consumer with units of 116483 units energy difference between HT & LT meters. An additional Bill of 307792.79 units has been recovered.

Apartment Audit Analysis:

In addition to the above, around 120 nos. of Apartments / Commercial Complex are also under Energy Audit under TPWODL. Primarily Smart meters are installed against 3ph consumers of Apartments. Smart meter installation process is going on against Apartment DT to eliminate Human Error and for proper energy accounting.

The Apartment audit report is as follows:

Name of Circle	**Apartments under Audit**	**No of Consumers**	**Loss Level**		
			0 to 1%	**1% to 3%**	**> *3%**
Rourkela	23	637	14	5	4
Sambalpur	20	993	12	4	4
Jharsuguda	31	813	15	11	5
Bolangir	11	358	9		2
Kalahandi	3	51			3
Bargarh	13	359	5	3	5
Total	**101**	**3211**	**55**	**23**	**23**

* The highest losses of 28.5 % observed in Narayani (Block B&C) apartment under Jharsuguda Division of Sambalpur Circle having unit losses of 3870 units.

11 kV Feeder Audit:

As regards 11 kV feeder auditing, only 78 nos. of feeders are being audited out of 1177 nos. of feeders due to lack of proper metering and consumer tagging. The loss ranges are depicted as below:

11 kV feeder	**Loss Range**				
	< 5%	**5% - 20%**	**20% - 40%**	**Data Under Validation**	**Grand Total**
	3	**5**	**18**	**52**	**78**

DTR Energy Audit Status:

There are 76797 no DTRs in TPWODL as of September'23. In the first phase, we have taken approx. 10598 nos. DTR of 100 kVA and above for 100% metering Till Sept 2023 2303, nos. DTR Smart metering was completed. We have targeted for completion of DTR Smart Metering by the end of Mar'2024. As of now, we are doing Energy Accounting of approx. 301 nos. DTR installed under TPWODL based on GIS tagging. A complete DTR audit will be done after the completion of the GIS tagging of consumers.

Abstract of DTR metering installed in different DTRs under respective Circles are as follows:

Sl. No.	Circle Name	No. of DTRs Metered
1	Rourkela Circle	669
2	Sambalpur Circle	607
3	Bargarh Circle	197
4	Bolangir Circle	127
5	Kalahandi Circle	703
TPWODL		**2303**

The Loss ranges are depicted as follows:

DTR	Loss Range				
	< 5%	**5% - 20%**	**20% - 40%**	**Data Under Validation**	**Grand Total**
	85	**51**	**43**	**122**	**301**

Perform Achieve Trade (PAT) Scheme:

National Mission of Enhanced Energy Efficiency (NMEEE) is one of the eight national missions of the NAPCC released by the Prime Minister on 30th June 2008. BEE has been entrusted with the task of preparing the implementation plan for NMEEE. The PAT scheme is formulated under the National Mission for Enhanced Energy Efficiency (NMEEE) which is one of eight plans in the National Action Plan on Climate Change (NAPCC). PAT is a regulatory instrument framed by BEE and the Ministry of Power to reduce specific energy consumption in energy-intensive industries and to reduce T & D losses in DISCOMs with an associated market-based mechanism to enhance the cost-effectiveness through certification of excess energy saving & which can be traded in power exchange.

PAT Cycle-VII activity in TPWODL:

In line with Section 14(g) of the Energy Conservation (EC) Act, the Central Government has notified targets (in the form of Specific Energy Consumption) for Designated Consumers (DCs) on 26th October 2021 under the PAT cycle-VII. The baseline Distribution loss of TPWODL has been fixed as 21.14% for the baseline year 2018-19 with a baseline net input energy of 7573.37MU. TPWODL has been directed to reduce its T&D Loss to 19.70% in the

Target Year 2024-25. If we achieve the target, an E-Certificate will be issued and if we fail to submit the Mandatory Energy Audit (MEA) within the stipulated period, as per the Energy Conservation Act, penalty may be imposed.

Accordingly, the following activities are carried out:

1. MEA and Measurement & Verification audit was carried out by M/s Energy Consultancy Services, Bhubaneswar & M/s. Federation of Indian Chambers of Commerce, and Industry (FICCI), respectively.
2. After verification of MEA audit through M&V audit, TPWODL saved 1876.32 TOE by reducing T&D Loss to 21.14% (In FY 2018-19) against the target of 23.80% from 35.5% (FY 2014-15-baseline year). Accordingly, 16136 Energy Saving Certificates were issued by BEE to TPWODL.
3. The T&D loss target for TPWODL under PAT Cycle-VII as of FY 2024-25 is 19.70%. However, as of FY 2022-23, T&D Loss of TPWODL was 18.4%.

Sl No	PAT Cycle	FY	No of Years	Baseline Year	Opening T&D loss%	Target T&D Loss%	Achieved T&D Loss%	Energy Saving Certification
1	PAT -II	FY 16-17 to FY 18-19	3	FY 14-15	35.46%	23.80%	21.14%	16136
2	PAT -VII	FY 21-22 to FY 24-25	4	FY 18-19	21.14%	19.70%	18.4% as on FY 22-23	Yet to be receive

4. We have already registered on the PAT Net portal and uploaded form -2 and other relevant documents as required by the BEE.
5. On 06th October'2021, BEE notified a fresh circular that from 2021 onwards, every DC must conduct an "Annual Energy Audit" through a third-party BEE-certified Auditor. Accordingly, the Annual Energy Audit was carried out in TPWODL through East Coast Sustainable Pvt. Ltd.

The Cost projected for Energy Audit for FY 2024-25 is as under:

Nature of Activity	FY 2024-25 (in Rs. lakhs)
Annual Energy accounting (Consultation Fee to Accredited Energy Auditor)	2
Periodic Energy accounting (Consultation Fee to Accredited Energy Auditor)	2.8
Total	**4.8**

2.5.2. Vigilance & Enforcement Activity

To reduce AT&C losses, several measures at the Division and Sub-Division level have been initiated. Some of these efforts are proving to be fruitful; however, more needs to be done to meet the targets set by the Regulator. It is observed that a constant vigil is needed so that the TPWODL customers & public at large do not use illegal means to get access to the TPWODL services.

At present 47 squads have been engaged through different agencies in the 17 Divisions. Each vigilance squad is assigned a minimum of 25 premises to be checked and a minimum booking of theft load of 200 kW per month. It is also planned to increase the team from 47 to 70 in the upcoming months. A Division-wise separate squad is also planned to inspect three phases and HT/EHT consumers. A data analysis wing is also to be created at the back office to analyze the meter data dump and low consumption cases to identify suspected theft cases.

Scope of Work

The Enforcement Team shall inspect meters during meter replacement, suspected disconnected meters retained under TD category, Misuse, detection of power theft in live meters based on information (records such as bills computer data, etc.), and intelligence gathering through covert means of surveillance, source work and detection of direct theft. It also involves raids being conducted during the night and early morning hours as may be planned by TPWODL for the best outcome.

i. Identification of theft cases.
ii. Preparation of a complete physical verification report after capturing all the evidence
iii. Seizure of material, preparation of seizure memo and handing over seized material to the concerned Section in charge.
iv. Submission of PVR report to concerned SDO/ Executive Engineer on the same day or the next morning.
v. The team shall be responsible for maintaining and sharing the MIS of cases checked and booked in the prescribed format provided by TPWODL daily.
vi. The team shall do door-to-door checking of at least 40 premises in the absence of any theft-related information.
vii. Facilitate Police in investigations like site identification, user and material evidence identification and submitting the material evidence at police stations.

viii. The involved team member needs to be present physically to proceed with the witness for trial by courts. Any expenses like (DA +TA for presenting the witness) need to be borne by the Business Associate.

ix. Reporting of Reading Accumulation Cases/ MD violations etc. abnormality to the concerned department/ back office for its resolution.

x. Supporting Enforcement Assessment cell team in conducting settlement camps for recovery from theft booked cases.

Details of deployment of Enforcement teams are as follows:

1. Sambalpur - 12 Nos Teams
2. Rourkela - 7 Nos Teams
3. Bolangir- 11 Nos Teams
4. Kalahandi - 8 Nos Teams
5. Bargarh -9 Nos Teams

Each team consists of 1 Supervisor, 1 Technician, 1 Helper/Photographer, and 1 Female Personal. The outsource team will be led by TPWODL employees.

At present around 31 teams have been involved in enforcement activities in 5 circles, the cost of those are estimated at Rs. 4.65 Cr. Per annum @ Rs. 1.25 lakhs per team per month. The cost of these 31 teams for FY 2024-25 has been proposed at Rs. 4.98 Cr. @ 7% escalation over previous year.

Furthermore, the Licensee is planning to involve a total of 70 teams for enforcement activities involving an additional cost of Rs. 5.05 Cr. for FY 2024-25.

The following amount has been estimated under enforcement activities for FY 24-25:

Name of the Vendor	**UoM**	**FY 23-24**	**FY 24-25**
No. of Teams	Nos.	31	70
M/S Amman Associate (Sambalpur, Bargarh, Bolangir and Kalahandi Circles)	Rs. Cr.	3.70	8.01
M/S Unix services (Rourkela)	Rs. Cr.	0.95	2.02
Total Amount	**Rs. Cr.**	**4.65**	**10.03**

2.5.3. Revival of Energy Police Stations in TPWODL

As per the order issued by the Odisha Electricity Regulatory Commission (OERC), Tata Power has taken over the management and operations of Western Electricity Supply Company of Odisha (WESCO) on the 01st of Jan 2021. TPWODL is responsible for the distribution and retail supply of electricity across five circles covering 48373 sq. km. in areas i.e., Rourkela, Sambalpur, Kalahandi, Bolangir, and Bargarh.

TPWODL is committed to providing reliable, affordable, and quality power supply along with superior customer service.

Since takeover, TPWODL has taken up various initiatives for providing ease of access to electricity to consumers like camps, spot bill payments, 24*7 customer service center, the inclusion of SHGs, etc. However, the company is still facing several challenges in curbing the theft and recovery of arrears. With the stated efforts, AT&C losses in TPWODL has been reduced to 18.28% in FY 23.

Earlier, erstwhile distribution company had established Energy Police Station in all Nine revenue Divisions to maintain discipline and curb the theft of electricity but due to financial crunch requisite payouts were not disbursed to police department so it was discontinued, this resulted in high AT&C losses. Reporting of these police staff is also one of the issues as there was not any senior police officer posted to monitor from the central level. To address, this issue it is proposed to depute one SP rank police officer at corporate office for better coordination. The office set up and other infrastructure like vehicles, was provided by the DISCOM.

It is gathered, presently EPS are functioning in the Utilities of Maharashtra, UP and Rajasthan. These are having scattered consumer base and EPS is effectively utilized to curb the theft.

Objective of EPS is to prevent theft of electricity, Arrear recovery and meter replacement in difficult areas. Detailed scope is mentioned as below:

A. Theft of Electricity

It is to be noted that since the date of the takeover, TPWODL has registered more than 40000 theft cases which includes Meter Tampering, Direct Theft from LT mains, Meter Bypass & Un-Authorized use of electricity.

Several Camps have been organized by TPWODL upto Section level to settle these theft cases, but still there are more than 25000 theft assessments are pending for collection, with a whooping amount of more than Rs. 53 Cr.

Due to high consumer resistance in the field, it is not possible to disconnect such consumers. Several incidences of manhandling took place in different parts of the TPWODL area. TPWODL operating area is spread over to more than 48K Sq kM in nine revenue districts of Western Odisha and most of the part is covered in the rural area. Electricity theft component in LT supply is around 40% of losses and to conduct raids in these remote areas where even communications signals are not available, police protection is required for the employees.

B. Arrear Recovery

The licensee is facing the problems of bill defaulters. It is to bring to your kind attention that out of 22-23 lacs consumers, around 6 Lacs consumers have never paid their electricity bills. The arrear amount in TPWODL is more than 3500 Cr. (Prior to date of taken over it is more than Rs.3000 Cr.)

The Licensee is trying its best to recover these dues by arranging collection camps, Bill revisions wherever required, spot payment arrangements, etc. However, our team is facing high resistance, especially in rural areas and several incidences of manhandling are also reported in different parts of TPWODL while doing disconnection of defaulters. In some places, the mob has also disrupted the working of section offices by sabotaging the desktops, Laptops, etc.

C. Meter Replacement

It is also needed to bring to your kind attention that around 2.5 Lacs consumers are having defective meters/ old electromechanical meters, which is against the CEA regulations 2010. The license is replacing these meters on a mass basis, however, management is again facing high resistance in several areas of DISCOM. Several incidences of Manhandling are also reported while metering replacement activities.

TPWODL management acknowledges the fact that existing police stations are overburdened by their daily routine activities and the manpower is not able to cope with the daily issues of DISCOM. In view of this, the license requests for the establishment of dedicated energy police stations at each revenue Division (9 in number) of western Odisha. In this regard, matter is being pursued with Home Dept. and DG Police.

Now TPWODL has plans for setting up of at least 2 EPS, in two circles (Bargarh & Bolangir) with following staffing position:

In addition to above it is proposed to depute one Senior police officer (SP) at corporate level for effective monitoring of all the above deputed staff in EPS and coordination with revenue District police officials.

Man-power Cost			
Human Resource	**Qty**	**Monthly Allowance**	**Costing (Rs. Lakhs)**
SP	1	2,67,500	2.68
Inspector	2	1,07,000	2.14
Sub Inspector	5	85,600	4.28
Constable (Male)	10	64,200	6.42
Constable (Female)	5	64,200	3.21
Home Guard (Male)	10	42,800	4.28
Home Guard (Female)	5	42,800	2.14
Total	**38**		**25.15**
Infrastructure Cost			
Office	5	1,07,000	5.35
Vehicle Cost	14	64,200	8.99
Misc. (House Keeping, Pantry, Electricity, Stationary etc)	5	53,500	2.67
Total	**24**		17.01
Total Monthly Cost			42.16
Annual Cost			**505.90**

The licensee shall provide office set up in in it's existing Division offices.

Total additional Cost under EPS for FY 24-25 will be Rs. 505.90 Lakhs, which may kindly be approved.

2.5.4. Additional Expenses towards IT Automation

Hon'ble Commission has approved Rs.42.02 crs in FY 2021-22, Rs. 48.19 Crs in FY 2022-23 and Rs. 67.18 Cr in FY 2023-24 under CAPEX head. The licensee has spent the amount entirely as approved by Hon'ble Commission for FY 2021-22, Rs. 37.67 Cr has been spent (till Sep 23) for FY 2022-23 and spend for pending Capex has been meticulously planned and work is in progress.

To maintain such critical assets, Opex is indispensable. Upon implementation of various IT automation activity, lot of visible changes has been undertaken & executed in last 30 months of operation. Some of the completed activity has been appended for perusal of Hon'ble Commission.

Innovative digital initiatives for Applications

In FY 2023-24, IT Team has continued implementation of it's digital innovations for the benefit of Customer as well as streamlining business process and growth of the company.

- **Revamped TPWODL Website (Odia/English)**
    - Odia website helps to connect with customer better

- **Launch of New Applications for efficient monitoring and improved business operations including our field force**
  - MMG 2.0 Application
  - Disconnection Order Mobile App
  - Energy Audit Application "Sarthi 2.0"
  - POD (Proof of Delivery) Application
  - OCR based meter reading Application
  - Application for One Time Settlement Scheme (OTSS)

- **Innovation on Collection Application "MUDRA"**

In line with company's focus on Digital journey programme, IT Team has further improvised Door to Door Collection facility & provided the flexibility to customers to make payments.

Implementation of "MUDRA" on bank provided POS (point of sales) machine proved to be game changer. Consumer can pay through any Digital payment channel including UPI. This has benefited both customers as well collection team. As on date, over 2300 POS machines are operational with this new facility.

- **Integration of Mo-Bidyut portal with GIS Application**
  - Helping in fast execution of New Service Connection with less effort for site/ dues verification
- **Smart Metering & Prepaid Metering Solution**
  - Infrastructure (HES, MDM) set-up and integration with MBC/CIS application
- **Manthan Application**

Manthan application has helped in identifying **Ghost Customer** and through this process assessing pending dues from these customers. This application has helped identification of 6.51 lac Customers under the Ghost Category and 2.02 Lacs Customers have been identified for recovery pf dues.

- **Development of Analytics Report and Dashboards & Reports**
  - This initiative was aimed for data-based management and giving actionable visuals and trend. Some of the important dashboards are :
    - KPI Dashboard
    - CEO Review Dashboard
    - Recovery Dashboard

- CMG Dashboard
- ODSSP Dashboard

❖ **Employee centric Initiatives:**

The notable employee centric initiatives are setting up IT support structure, providing laptops and implementation of Office 365 productivity suite. To get the IT support in time, we have enabled “self-ticketing” tool instead of Mail/Call. With regards to these initiatives, IT aimed to improve operational efficiency, the company has implemented employee centric as follows:

- **PTL Application** - Improvising on last FY deployment of Face Recognition Attendance Management System, PTL Application has been launched for regularization of attendance on approval basis. This application has been extended to all employees across TPWODL.
- **VC Devices** - Video Conference machines have been installed across Circle & Division offices and MS MTR licenses have been procured for effective implementation of MS Teams meeting. This has enabled online meetings and avoided travel expenses and increased flexibility in employee communication.
- **Wi-fi Access Point Devices** - IT Enterprise Network Infrastructure has been strengthened by installing 230 Wi-Fi Access Point devices along with license, across 160 Office locations which improved working environment of employees at large.
- **Heavy Duty MFP** - Similarly Heavy-duty Multifunction Printers have been installed across offices and continual vendor support for repair & maintenance has been provisioned across offices.
- **CCTV at Office / CCC Locations –** CCTV surveillance has been installed at 54 Locations including 17 CCC locations. This installation is helping improve the security surveillance at identified office locations where multiple unwarranted incidents have been reported.
- **Distribution of IT Asset (Laptop, Desktop, Printer) & Mail creation as per required basis**

SAP Implementation Updates –

Additional features across different SAP Modules (PM/MM/FICO/HCM) have been implemented for facilitation of services and improve business processes across different departments.

- **FICO Module**
  - New Depreciation Rates- as per OERC Regulatory Act-Configured and implemented
  - Asset Retirement-Approval Process and Auto Retirement Accounting
  - Asset Master Creation-BDC for Mass Upload
  - End to End process designed-Capitalize-Govt. Assets (Transformers) of zero value
  - WBS Owner Mapping-Partner Functionality and Updating the same in Reports
  - Trust Accounting Implementation
  - Bank Guarantee & EMD - Register/Approval Process/E-mail Alerts
  - Cap note Creation/Approval Process/E-mail Alerts/Asset Master Creation
  - Creation of new Service Valuation Classes-For all Service Codes Creation
  - CLA Processing through PO
  - Report on AUC Aging Analysis
  - TRM-TDS Report Business Partner wise
- **MM Module:**
  - Subcontracting PO for Transformer Repairs
  - Online Vendor registration Portal
  - Contract Amendment form approval through FIORI
  - Inventory Ageing Analysis Report
  - Pending PO/RC/RO release status report
  - System restriction for the GRN and SES >7 days of Current Date
  - Blocking of the Material Master posting and Consumption Posting with Pool WBS
- **QM Module:**
  - Incoming Material Inspection
  - Email activation releasing material block to unblock.
  - Material Inspection certification
- **PM Module:**
  - Equipment master Sync with GIS as per Site review

  - Fiori Application for Preventive Maintenance
  - Fiori Application enhancement for Auto installation of the Transformer to the Location
  - Go live of A1 Notification - System alteration Process.
  - FCC Application improvement items (Arrear and Non NPS complaints)

- **Infrastructure Augmentation at Technology Centre**

  Technology Center hardware augmentation has been done by installing new active hardware considering the additional infrastructure and new project implementation requirements.

  - **DC Active Hardware** - Provisioning of multiple Data Center Active Hardware
    - Server provisioning for business Application rollout.
    - SAN Storage space upgradation to support bulk storage requirement.
    - Backup configuration for important Servers which host critical business applications.
    - Installation & commissioning of 2 nos. of Link Load Balancer (LLB) on HA mode to ensure Technology Center communication redundancy.
    - Network Devices (Router/Switch etc.) for implementation of IT/OT Applications.
  - **ICC Infrastructure –**
    - Server & Network infrastructure has been installed at Burla Data Center. This is in line to the thought of consolidated Contact Center availability for 4 DISCOMs.

- **Implementation of Cyber security plan -**

  With better Infra & Communication, it is also important to secure our network as well as data. The following plans are taken & more planned in FY -25.

  - **Action Taken –**
    - Implementation of process – Mail ID Creation, VPN Access, DC Access etc.
    - Purchase of EMS E3 License of O365 (AIP + MDM)
    - Firewall with IPS, Botnet, C&C protection
    - End point security – Antivirus, HIPS.

The proposal for digitization of Legacy documents was placed under CAPEX proposal FY 23-24 wherein Hon'ble Commission observed that the same component can be taken under A&G expenses. Accordingly, the Licensee also considered under A&G for FY 24-25 under additional A&G expenses.

The details of IT automation cost under different head is as below:

Particulars	Rs. Lakh
M365	225
Customer Experience Enhancement	25
SAP AMC	300
Internet Connectivity	30
MBC CIS Support FG & Digitization of documents	1200
Manpower Support Services	270
Software & Subscriptions	240
Enterprise IT & Infra	140
TOTAL	**2430**

However, the Licensee has considered Rs. 5.65 Cr. (Rs. 0.25 Cr. – Customer Exp. Enhancement + Rs. 1.40 Cr. – Enterprise IT & Infra and Rs. 4 Cr. – MBC CIS Support FG including digitization of legacy documents) towards additional expenses as all other costs are recurring in nature.

2.5.5. Meter Replacement (Recurring expenses other than cost of meters)

Manpower Services Cost for Consumer Survey

Around 3 Lakhs consumers have defective meters in the billing database. These faulty/defective meters are being replaced in mass. However, during replacement of these meters in the field, it is observed that many premises are locked, or consumers are not available at the site. To attend to such cases multiple visits are required by replacement teams thereby reducing their efficiency and increasing cost of the entire activity. To overcome such a scenario, it is pertinent to identify the locations and exact status of these connections, for which survey activity needs to be carried out beforehand so that Meter Replacement activity can be done in a more effective and time-bound manner. To carry out survey, a mobile application has been developed by the in-house IT Team named "MMG 2.8" which has made the meter replacement activity a lot systematic, automatic, and error-free. Accordingly, the following recurring cost shall also be incurred during FY 24-25.

Activity	Survey of Faulty Meter Cases
Period	**FY 2024-25**
Qty.	1,20,000 nos

Base Price in Rs.	Rs. 283.20/-
Total Rs. In Cr.	**3.40**

Expenses towards Maintenance and testing of CT/PT Unit

As per OERC Conditions of Supply Code-2019 and the CEA regulations all EHT & HT Meters must be tested once every year, single-phase consumers once in 5 years and three-phase must be tested once every 03 years. This is a statutory requirement and TPWODL needs to comply with it. At present, there are 1875 nos. of HT & EHT consumers and approx. 3000 consumers having LTCT meters in the purview of meter testing for which agencies need to be hired who are experts in carrying out such testing activities. Work is allotted based on tendering and competitive bidding to agencies equipped with all required tools and instruments suitable for offline as well as live line field testing and possess sufficient logistics facilities for ferrying manpower and testing equipment across the TPWODL area. Accordingly, the following recurring cost shall also be incurred during FY 24-25.

Activity	**Expenses towards maintenance & Testing of CT/PT**
Period	**FY 2024-25**
No. of Teams	6
Monthly Expense/Team	2,83,000
Total Rs. In Cr.	**2.03**

Tools & Equipment - Lineman Tool Kit:

Linemen work on electrical cables and powerlines with powerful electric currents, making it mandatory to follow all applicable safety protocols, and PPE and use proper tools and tackles to keep them protected from electric shock and accidents. As there are 201 Sections across TPWODL, approx. 500 such kits are required per annum to replace worn-out defective items and provide immediate replacement to maintain continuity of meter testing services. Accordingly, the following recurring cost shall also be incurred during FY 24-25.

Activity	**Tools & Equipment - LINEMAN TOOL KIT**
Period	**FY 2024-25**
No. of Teams	600
Per Unit Cost	1,770
Total Rs. In Cr.	**0.11**

Calibration of Instruments:

As per ISO 9001, all testing instruments are required to be calibrated at defined intervals, at least once a year through the NABL Certified Statutory Agency. Instruments like meggers, earth testers, clamp-on meters, multimeters, on-site accuracy testers, CTPT testers, etc. are being used for maintaining metering at operational standards. Accordingly, the following recurring cost shall also be incurred during FY 24-25.

Activity	**Calibration Of Equipment**
Period	FY 2024-25
Total Rs. In Cr.	**0.12**

Rental for SIMs for Modems:

To keep the AMR Modems installed at HT Consumers billing meters, monthly rental charges for SIMs are required for remote and timely reading and billing on the 1st day of every month or on demand.

The required recurring cost (FY 24-25) for this activity is as follows:

Activity	**Rental for SIMs for Modems/Smart Meters**
Period	**FY 2024-25**
Qty.	60000
Base Price in Rs.	Rs. 20/-
Total Rs. In Cr.	**0.012**

Expenses towards maintenance of Office & MMG Store:

To facilitate timely availability of meters and metering materials at all locations, including remote locations, 25 Nos. Porta Cabins were procured for setting up of MMG office as well Material Storage at various MMG locations. These porta cabins act as storage for materials drawn from central stores for site activities. Accordingly, the following recurring cost shall also be incurred during FY 24-25.

Activity	**Expenses towards maintenance of Office & MMG**
Period	FY 2024-25
Qty.	25
Unit Price in Rs.	5000
Total Rs. In Cr.	**0.125**

Replacement of Dusty/Non-Visible Meter Boxes

Around 50000 Meter Boxes need to be replaced as these boxes have got dirty due to environmental factors and continuous exposure to elements and Meter reading and other details are not visible from outside. Due to such meter boxes use of OCR technology for meter reading purposes is also hindered cost of replacement of such meter boxes is as follows:

Activity	Replacement of Meter Boxes
Period	FY 2024-25
Qty.	50000
Unit Price in Rs.	644
Total Rs. In Cr.	**3.22**

However, the Licensee has considered Rs. 3.22 Cr. (on account of replacement of meter boxes) towards additional expenses as all other costs are recurring in nature.

2.5.6. Meter Reading, Billing & Collection (MBC)

With the vision of initiating the structured and proper course of the reform process, the TPWODL has introduced a system of competitive bidding with proper checks and balances for the appointment of Division wise Metering and Billing Agencies. Thereby, after going through the complete process of competitive bidding in a transparent manner, 11 (Eleven) Agencies were appointed and started their Metering and Billing activity from 1st August 2022 in a phased manner to carry out performance-based tasks of Meter reading and billing activities in their assigned Divisions. Besides, the primary activities of Meter reading and billing, the incentives are attached with other supporting and loss reduction activities such as reporting of extra-connections, Theft/ Unauthorized Extension, Misuse cases, reporting of unethical activities, OCR-based billing, etc.

With the vision of accommodating the future requirements and dynamic needs of the organization, the broader spectrum of performance parameters such as training & development of BA employees on the new billing system namely the Fluent Grid (FG) billing system are taken into consideration while deciding the scope of service level agreements with the agencies. The Division wise detail of the Agencies appointed is as follows:

DIVISION WISE METERING & BILLING AGENCIES APPOINTED	
Agency Name	**Division**
Inventive Software Solutions Pvt. Ltd	BED-BALANGIR
Shyam Indus Power Solutions Pvt. Ltd	TED-TITLAGARH
Hindustan Engineering Corporation	SED-SONEPUR
	NED-NUAPADA
M/S BKS ENTERPRISES	KEED- KALAHANDI
	KWED- KALAHANDI
Emdee Digitronics Pvt. Ltd	BWED-BARGARH
Powertech Consultants India Pvt. Ltd	BED-BARGARH
M/S BUDDHAM BUILDERS PRIVATE LIMITED	RED-RAJGANGPUR
	SED-SUNDERGARH
M/S The Imperial Electric Company	RED-ROURKELA
	RSED- ROURKELA
M/S Data Ingenious Global Limited	BED-Brajraj Nagar

	DED-Deogarh
Powertech Consultants India Pvt. Ltd	JED-JHARSUGUDA
M/S G.V. Electricals Pvt Limited	SED-Sambalpur
	SEED-Sambalpur

Coverage Area/ Extent of Applicability:
This includes a complete operating area of TPWODL which includes:

CIRCLE NAME	ROURKELA	SAMBALPUR	BARGARH	BOLANGIR	KALAHANDI	Total
No. of Division	4	5	2	3	3	**17**
No. of Sub-Divisions	14	12	9	11	10	**56**
No. of Sections	45	57	31	36	32	**201**

Scope of work:
The scope of work extends to the whole operating area of TPWODL and includes-

i. Meter reading for spot billing consumers
ii. Meter reading for non-spot billing consumers
iii. Special meter readings
iv. Bill Distribution, with collection of consumers contact details.
v. Painting of walk-in sequence
vi. Training & development of BA employees

Besides the above, following additional initiatives have been taken to improve billing efficiency: -

i. OCR Based Billing
ii. Installation of Smart Meters in Single Phase consumers
iii. Installation of Smart Meters in Agriculture Consumers.
iv. Replacement of defective and aging meters
v. Expedite the Bill Revision process for error-free billing.
vi. Efforts to reduce provisional billing.
vii. Onsite statutory testing of consumer meters.
viii. Hiring extra manpower to expedite the meter replacement activities.
ix. Lead of theft/misuse.
x. Capturing the count of ACs installed in a premises.
xi. Establishment type capturing through bill distributors.

Estimated cost involved in carrying out core functions of Revenue Cycle Management Departments i.e. Meter Reading & Billing for FY 2024-2025 on the basis of consumer data up to OCT. 2023 enumerated below:

Estimated Monthly Cost of Spot Meter Reading, Billing and Bill Distribution and service of Disconnection Notice Cost			
CIRCLE	**Total No. of Consumers**	**Rate**	**Total Cost (in Rs.)**
BALANGIR	4,44,248	₹ 20.46	₹ 90,90,145.79
BARGARH	2,66,875	₹ 24.39	₹ 65,10,250.09

SAMBALPUR	4,08,919	₹ 20.05	₹ 81,97,464.71
KALAHANDI	4,63,784	₹ 19.81	₹ 91,85,253.82
ROURKELA	4,06,893	₹ 18.02	₹ 73,30,411.64
TOTAL	**19,90,719**	**₹ 20.25**	**₹ 4,03,13,526.04**

Estimated Monthly cost for Meter Reading of Non SBM Consumers- Other Than Irrigation/PWW and SPP			
CIRCLE	**Total No. of Consumers**	**Rate**	**Total (in Rs.)**
BALANGIR	1,582	₹ 36.16	₹ 57,197.22
BARGARH	1,370	₹ 55.28	₹ 75,717.86
SAMBALPUR	3,934	₹ 54.71	₹ 2,15,247.35
KALAHANDI	1,197	₹ 61.98	₹ 74,186.74
ROURKELA	3,262	₹ 52.84	₹ 1,72,394.86
TOTAL	**11,345**	**₹ 52.42**	**₹ 5,94,744.04**

Estimated Monthly cost for Colored Bill Printing			
CIRCLE	**Total No. of Consumers**	**Rate**	**Total (in Rs.)**
BALANGIR	9,151	₹ 16.40	₹ 1,50,040.25
BARGARH	6,167	₹ 7.29	₹ 44,929.52
SAMBALPUR	16,609	₹ 16.00	₹ 2,65,666.10
KALAHANDI	6,624	₹ 27.48	₹ 1,82,041.73
ROURKELA	12,234	₹ 20.05	₹ 2,45,332.29
TOTAL	**50,784**	**₹ 17.49**	**₹ 8,88,009.89**

Estimated Monthly cost for Bill distribution of Non-SBM Consumers including disconnection/other notice delivery with Acknowledgement			
CIRCLE	**Total No. of Consumers**	**Rate**	**Total (in Rs.)**
BALANGIR	908	₹ 37.43	₹ 33,983.09
BARGARH	614	₹ 24.50	₹ 15,031.93
SAMBALPUR	2,095	₹ 40.31	₹ 84,429.63
KALAHANDI	794	₹ 39.42	₹ 31,279.51
ROURKELA	1,135	₹ 66.71	₹ 75,687.15
TOTAL	**5,544**	**₹ 43.36**	**₹ 2,40,411.31**

Estimated Monthly cost for Bill distribution of Non SBM Consumers including disconnection / other notice delivery without Acknowledgement			
CIRCLE	**Total No. of Consumers**	**Rate**	**Total (in Rs.)**
BALANGIR	8,867	₹ 37.41	₹ 3,31,678.16
BARGARH	5,970	₹ 20.70	₹ 1,23,574.82
SAMBALPUR	16,148	₹ 27.90	₹ 4,50,463.48
KALAHANDI	6,454	₹ 31.80	₹ 2,05,233.33
ROURKELA	11,931	₹ 53.45	₹ 6,37,763.94
TOTAL	**49,370**	**₹ 35.42**	**₹ 17,48,713.73**

Estimated Monthly cost for Special Meter Reading/Site Verification report			
CIRCLE	**Total No. of Consumers**	**Rate**	**Total (in Rs.)**
BALANGIR	6,396	₹ 53.16	₹ 3,40,004.16

Estimated Monthly cost for Special Meter Reading/Site Verification report			
CIRCLE	**Total No. of Consumers**	**Rate**	**Total (in Rs.)**
BARGARH	4,264	₹ 48.46	₹ 2,06,635.09
SAMBALPUR	10,660	₹ 40.56	₹ 4,32,379.99
KALAHANDI	6,396	₹ 91.88	₹ 5,87,632.50
ROURKELA	8,528	₹ 60.49	₹ 5,15,894.32
TOTAL	**36,244**	**₹ 57.46**	**₹ 20,82,546.07**

Estimated Monthly cost for Special Bill Distribution / Notice with Acknowledgement			
CIRCLE	**Total No. of Consumers**	**Rate**	**Total (in Rs.)**
BALANGIR	156	₹ 32.90	₹ 5,132.18
BARGARH	104	₹ 23.70	₹ 2,465.19
SAMBALPUR	260	₹ 51.86	₹ 13,484.88
KALAHANDI	156	₹ 65.14	₹ 10,161.46
ROURKELA	208	₹ 60.49	₹ 12,582.79
TOTAL	**884**	**₹ 49.58**	**₹ 43,826.49**

Estimated Monthly Meter Reading of Non-SBM Consumers- Irrigation/PWW and SPP Cost			
CIRCLE	**Total No. of Consumers**	**Rate**	**Total Cost (in Rs.)**
BALANGIR	24,221	₹ 40.76	₹ 9,87,164.58
BARGARH	34,715	₹ 37.62	₹ 13,06,010.65
SAMBALPUR	12,376	₹ 55.82	₹ 6,90,827.39
KALAHANDI	15,460	₹ 67.92	₹ 10,50,049.79
ROURKELA	9,291	₹ 74.34	₹ 6,90,679.71
TOTAL	**96,063**	**₹ 49.18**	**₹ 47,24,732.13**

2.5.7. Loss Reduction

In addition to aforesaid incentives for loss reduction have been taken and approx. estimated annual calculations are as follows:

(i) OCR Based Meter Reading:

With the objective of ensuring actual reading-based billing and ensuring the best customer services to the end consumers, TPWODL incurs expenditure for the replacement of defective meters, implementation of smart meters, and onsite statutory testing of consumer meters and use of latest technology for accurate meter reading In order to ensure the reading-based billing of all consumers, TPWODL offers Rs.18.50/- per bill Metering & Billing Agency With the introduction of OCR-based reading an additional cost of @Re.1/- per bill get added. TPWODL has proposed Metering & Billing cost in FY 24-25 as per table mentioned below:

Activity	OCR Based Reading
Period	FY 2024-25
Qty./ Month	20,81,076
Base Price in Rs.	Rs. 1.00/-
Total Rs. In Cr.	**2.49**

(ii) ECL Consumer survey Cost / Cost of Never Paid cases

Presently there are around 5.55 Lac ECL consumers who have never paid/Less paid less than 20% of their dues since the date of the power supply. To cover these consumers and to identify actual site remarks, TPWODL has developed one in-house mobile application named "MANTHAN" to carry out this survey. To expedite the survey, one lakh consumers have been taken as the target for FY 2023-2024 to complete the survey on a priority basis, Rs.30/- per consumer is considered towards survey cost.

Activity	Survey of Never-Paid Consumers
Period	FY 2024-25
Qty.	2,00,000
Base Price in Rs.	Rs. 30/-
Total Rs. In Cr.	**0.6**

(iii) Estimated Monthly cost for Extra Connections:

Reporting Extra Live connections not in TPWODL billing system, presently or disconnected / Removed in TPWODL

Estimated Monthly cost for Extra Connections: Reporting Extra Live connections not in TPWODL billing system, presently or disconnected / Removed in TPWODL billing system, not given in downloaded data			
CIRCLE	**Total No. of Consumers**	**Rate**	**Total (in Rs.)**
BALANGIR	150	₹ 600.00	₹ 90,000.00
BARGARH	100	₹ 600.00	₹ 60,000.00
SAMBALPUR	250	₹ 600.00	₹ 1,50,000.00
KALAHANDI	150	₹ 600.00	₹ 90,000.00
ROURKELA	200	₹ 600.00	₹ 1,20,000.00
TOTAL	**850**	**₹ 600.00**	**₹ 5,10,000.00**

(iv) Estimated Monthly cost for Capturing & reporting of correct Mobile No/Email ID.

CIRCLE	Total No. of Consumers	Rate	Total (in Rs.)
BALANGIR	8,500	₹ 2.00	₹ 17,000.00

CIRCLE	Total No. of Consumers	Rate	Total (in Rs.)
BARGARH	5,500	₹ 2.00	₹ 11,000.00
SAMBALPUR	12,500	₹ 2.00	₹ 25,000.00
KALAHANDI	8,500	₹ 2.00	₹ 17,000.00
ROURKELA	10,000	₹ 2.00	₹ 20,000.00
TOTAL	**45,000**	**₹ 2.00**	**₹ 90,000.00**

(v) Estimated Monthly cost for Conversion of provisional/average bill continues more than 6 months into the actual base.

The estimated Monthly cost for Conversion of provisional/average bill continues more than 6 months into the actual base			
CIRCLE	**Total No. of Consumers**	**Rate**	**Total (in Rs.)**
BALANGIR	2,500	₹ 40.00	₹ 1,00,000.00
BARGARH	2,000	₹ 40.00	₹ 80,000.00
SAMBALPUR	2,500	₹ 40.00	₹ 1,00,000.00
KALAHANDI	2,000	₹ 40.00	₹ 80,000.00
ROURKELA	2,000	₹ 40.00	₹ 80,000.00
TOTAL	**11,000**	**₹ 40.00**	**₹ 4,40,000.00**

2.5.8. Initiatives for improvement of Reliability, SCADA/GIS etc

In order to improve the reliability and reduce the losses and to improve the overall performance, effective implementation of technologies is required. TPWODL is in the midst of technology transformation to provide quality customer services and to deliver highly reliable and improved quality supply in safe manner to its consumers by meeting various standards of operation. To bring the various latest technology, systematic investment is planned by TPWODL as given below in Operation Technology.

FY 2021-22 has been very challenging in terms of unprecedented and prolonged Pandemic of Covid second wave, Despite of every odds, TPWODL has attained many achievements such as establishment of 24*7 & Operational Power System Control Centre (PSCC) and provided mobile applications to all 33/11KV Primary Sub-Station to collect the operational information, Planned Outages monitoring and information pass on to consumers regarding the outages in their area before 48 hrs. every major breakdown and planned outages informed to centralized Call Centre and consumers benefitted through it.

During the span of journey, Operation Technology has played a critical role in transforming the organization and has yielded superlative results in terms of bringing efficiency into the system and enhancing customer experience. Key Operational Technology initiatives includes automation of substations through Supervisory Control and Data Acquisition

(SCADA), Consumer and asset mapping through Geographical Information System (GIS), Integrated Communication Technology (ICT) & Smart meter backend infra.

Accordingly, for FY 24-25 the Licensee has considered the following expenses under OT including additional expenses of Rs. 14.19 Cr.

OT OPEX items	FY 24-25
Automation Spare materials	17.92
Repairing & Maintenance Automation Devices	30.00
SIM Card Rental for Smart Meters	1047.84
HES AMC services	70.80
FMS services	472.00
MDMS AMC services	35.40
Recurring Charges of MPLS Link	220.50
Optic Fiber Maintenance	10.80
Technology Center Equipment AMC Services	13.85
TOTAL	**1919.11**

1. Automation:

The operational expenditure (OPEX) for 200 numbers of Primary Substation (PSS) in FY-25 and 258 numbers of PSS in FY-26 Automation-related Spare Parts, along with Repairing and Maintenance of various Automation Devices, is imperative to uphold the reliability and functionality of critical automation infrastructure.

1.1 PSS Automation related Spare Parts:

- Spare parts such as RTU cards, ALSTOM C264, Schneider C264, surge arresters, fuses, MCBs, Ethernet cables, serial cables, GI conduit cables, cable connectors, RS232 converters, panel sealants, cable strippers, etc., are essential components of the PSS Automation system.
- Maintaining an inventory of these spare parts ensures quick replacements in the event of component failures, reducing downtime and sustaining the optimal performance of the automation infrastructure.
- Adequate spare parts availability is a proactive measure to address potential issues swiftly, contributing to system reliability and operational efficiency.

1.2 Repairing & Maintenance of Automation Devices:

- Regular maintenance and repair activities for devices such as RTU cards, multi-functional meters, Ethernet switches, etc., are critical for preventing malfunctions and ensuring sustained functionality.
- Scheduled maintenance helps identify and address issues proactively, minimizing the risk of unexpected failures and optimizing the overall performance of automation devices.
- Investing in repairing and maintaining automation devices extends their operational life, providing a cost-effective approach to infrastructure management.

Proposed Operational Expenditure Plan – FY (24-25)

Item/Job Description	Budget Required for FY-25 in Rs. Cr.
Automation Spare materials	₹ 0.18
Repairing & Maintenance Automation Devices	₹ 0.30

2. Communication:

Communication Backbone MPLS

The Opex for the MPLS link services at the 466 locations is essential to support the seamless and secure functioning of the company's extensive IT and OT networks. MPLS (Multiprotocol Label Switching) plays a critical role in extending the company's Local Area Network (LAN) without relying on the public internet, ensuring a private and dedicated connection across its various locations.

2.1 IT Network:

- The IT Network spans across Circle Offices, Division Offices, Subdivision Offices, Section Offices, MRT Offices, Stores, Customer Care, Collection Counters and GRF.
- With approximately 208 locations, the MPLS link services are vital for efficient communication and data transfer, requiring substantial bandwidth to accommodate the numerous users in each office.
- MPLS enhances safety, security, reliability, and operational speed, contributing to the seamless delivery of applications across the extensive IT Network.

2.2 OT Network:

- The OT Network encompasses Sub Stations, where low latency and low jitter are crucial for remote operations and monitoring of substations. These activities are centrally controlled from the main control Centre located at Burla.
- With around 258 locations, the MPLS link services become indispensable for maintaining a reliable and responsive network, ensuring the timely and secure transmission of data between substations and the central control Centre.

2.3 Optic Fiber Maintenance:

Optic Fiber Maintenance is essential to ensure the continuous and reliable performance of the optical Fiber network of 350 kM.

1. **Network Reliability:** Optical fiber is a critical component of modern communication networks. Regular maintenance is necessary to identify and address potential issues proactively, preventing network disruptions.
2. **Minimizing Downtime:** Scheduled maintenance activities contribute to minimizing downtime by addressing wear and tear, environmental factors, or any potential damage to the optical fiber infrastructure.
3. **Optimizing Performance:** Maintenance is crucial for optimizing the performance of the optical fiber network, ensuring the efficient transmission of data and maintaining the quality of communication services.
4. **Preventing Failures:** Proactive maintenance helps in identifying and rectifying potential points of failure before they escalate into larger issues, enhancing the overall reliability of the network.
5. **Environmental Factors:** Optic Fiber networks are susceptible to environmental factors such as weather, temperature changes, and physical wear. Maintenance activities include inspections and repairs to mitigate the impact of these factors.

Proposed operational Expenditure Plan – FY (24-25) & (25-26) [4.63 Cr]

Item/Job Description	Budget Required for FY-25 in Cr.
Recurring Charges of MPLS Link	₹ 2.21
Optic Fiber Maintenance	₹ 0.11

3. Smart Metering and back-end infrastructure

Smart meters represent an intelligent choice for both consumers and DISCOMs. While providing complete transparency in billing and consumption patterns for utilities, they empower consumers to optimize their usage and achieve significant savings. The Government of India, through the Ministry of Power Gazette notification (F.No. 23/35/2019-R&R) dated 17th August 2021, has mandated that all states transition from conventional meters to more advanced prepaid smart meters within the next three years. This initiative marks India's largest digital transformation within the industry.

The company is spearheading this digital transition by implementing various digital initiatives for continual upgrades and enhancing the technology landscape. Aligned with the company's commitment to maximizing sustainable value for all stakeholders through IT/OT-enabled solutions and smart technology, it is undertaking several technology intervention initiatives to address the digital needs of ongoing and envisaged projects. The purpose of this proposal is to highlight the necessity for the company to adopt smart metering as part of its digital transformation strategy.

The OPEX for SIM Card Rental, HES AMC services, FMS (Facility management Services), and MDMS AMC services is crucial to support the operational efficiency and maintenance of a substantial smart meter infrastructure.

3.1 SIM Card Rental for Smart Meters:

- Involves the rental costs associated with SIM cards for approximately 462500 nos. smart meters in FY 25 and 900000 nos. smart meters in FY 26.
- SIM cards enable communication and data transfer for smart meters, facilitating real-time monitoring, control and data retrieval.

3.2 HES AMC Services:

- Encompasses the annual maintenance contract for the Head-End System, a critical component that manages communication between smart meters and the central system.

- AMC services ensure the reliability, performance and security of the HES, minimizing downtime and optimizing the functionality of the entire smart meter network.

3.3 FMS Services:

- Includes Facility management Services, addressing physical and technical maintenance requirements for the smart meters deployed in the field.
- FMS services are essential for proactively identifying and resolving issues, ensuring the continued accuracy and performance of smart meters.

3.4 MDMS AMC Services:

- Encompasses the Annual Maintenance Contract services for the Meter Data Management System, responsible for collecting, processing, and managing data from smart meters.
- AMC services for MDMS guarantee the integrity and efficiency of data handling, contributing to accurate billing and effective energy management.

Proposed operational Expenditure Plan – FY (24-25)

Item/Job Description	Budget Required for FY-25 in Cr.
SIM Card Rental for Smart Meters	₹ 10.48
HES AMC services	₹ 0.71
FMS services	₹ 4.72
MDMS AMC services	₹ 0.35

Accordingly, the Licensee has considered Rs. 14.19 Cr. as additional A&G costs.

4. Data Center

The Annual Maintenance Contract (AMC) services for the Main Control Center is crucial to ensure the continued and efficient functioning of this central hub for System reliability, Proactive issue resolution, equipment longevity, Security and Compliance and Optimizing Performance

1. **System Reliability:** The Main Control Center serves as the nerve Center for data Center operations, managing and monitoring critical functions. AMC services are essential for maintaining the reliability and availability of the systems housed within this Center.

2. **Proactive Issue Resolution:** An AMC includes routine inspections, proactive maintenance, and timely issue resolution. This proactive approach helps identify and address potential problems before they lead to system failures, minimizing downtime.

3. **Equipment Longevity:** Regular maintenance not only ensures immediate operational efficiency but also contributes to the longevity of the equipment and systems within the Main Control Center. This in turn, supports the overall sustainability and cost-effectiveness of the data center.

4. **Security and Compliance:** AMC services play a vital role in ensuring that security measures and compliance standards are consistently met. Regular updates and checks are performed to address any vulnerabilities and maintain a secure operational environment.

5. **Optimizing Performance:** The AMC services focus on optimizing the performance of the Main Control Center's infrastructure, including servers, networking equipment, and control systems. This is crucial for the efficient management of data flows and operations.

Proposed operational Expenditure Plan – FY (24-25)

Item/Job Description	**Budget Required for FY-25 in Cr.**
Technology Center Equipment AMC Services	₹ 0.14

Loss Reduction:

During limited site inspections, the energy meters were observed missing at the consumer’s premises. There were many non-functional energy meters comprising obsolete technology-based energy meters, burnt, rusted and faulty energy meters.

These issues are resulting into reduction in billing efficiency, high AT&C losses and caused an increase in making provisional billing, defective billing and substantial consumer complaints leading to customer dissatisfaction. The errors in the bills lead to non-payment of bills and thus, hampers the collection efficiency.

Further, it was also observed that meters are not installed on all Distribution Transformers (DT) leading to no energy accounting at DT level. As a result, it is not possible to determine the level of energy input and hence unable to measure AT&C losses at DT level. Energy accounting provides the means to identify areas of leakages, wastage and inefficient energy usage.

To reduce the techno-commercial losses, the following key activities are planned for execution:

- Replacement of burnt / faulty / electromechanical meters
- Installation of smart meters along with back-end IT infrastructure
- Upgradation of the existing metering system for 3-Phase all categories and 1- phase having consumption more than 200 Units per month.

2.5.9. Customer Care & Call Centre

It is utmost important to resolve consumer grievances as quickly as possible. The traditional system of Fuse Call Centre (FCC) is now strengthened to address all the technical issues related to the supply of power from closure quarters to the consumer premises. Call Centre has been ever since April 2021 with following features:

Features of Call Centre:

i. Interactive Voice Response System (IVRS) based calls routing to agents.
ii. Computer Telephony Integration with CRM
iii. Options of three languages i.e. Odia, English and Hindi
iv. Auto-forwarding of complaints to SDO & Section based on complaint codes derived from the consumer account.
v. IVRS with 7 options to choose from.
vi. Reporting of theft and ethics-related issues through voice-recorded message
vii. Option available on IVRS for mobile number and Email ID updating.

Functions of Call Centre

1. Exclusive E- Care Centre – Initiated for responding to Consumer queries, requests, complaints & grievances through Emails, Letters, and social media. Also, auto-response integrated through E-Mail and standard script designed for a proper written response to consumer E-mail to improve experience.
2. New initiative taken as New Service Connection (NSC) missed call service where call center team regularly follow up with the consumer who give a missed call on 7411779783.
3. IVRS for Capturing Mobile Numbers and E-Mail IDs – IVRS was developed to capture mobile numbers and e-mail IDs to improve consumer outreach and other service-related communications.
4. Initiative taken to collect all EHT/HT consumers' contact numbers and Email IDs to improve contact and other service-related communication.
5. KAM Contact Plan - As a part of the KAM Contact plan, connected with all HT/EHT Consumers. Taken up the resolution of issues/complaints with respective departments.
6. E-Billing Drive for HT_EHT Consumers- Initiative taken to send E-Bill from Key Accounts Manager (KAMs) email ID within 8 hours from the time of bill generation then E-Bill gets generated automatically from FG portal to consumer email ID with a copy marked to respective KAMs. Who confirms receipt of the bill form the consumers.
7. Tele-Calling Process for Recovery - Tele-calling process initiated to maximize revenue recovery from pending arrears of HT, EHT, and LT_3 Phase Consumers.
8. Initiated Call Back Request Process to reduce Inbound call Average Handling Time and Improve overall Consumer experience. Call Back Request was taken for detailed Bill clarification, the system downtime, and for continuing conversation interrupted due to call disconnection during an ongoing consumer call.
9. Consumer queries, complaints & attribute changes are taken care immediately with the appointment of KAMs in coordination with respective departments.
10. HT-EHT Client Visit Programmed – A program initiated to establish closer contact with such consumers KAM who visit HT-EHT clients. These visits help in developing a trust relationship, communicate value-added services and AMC solutions for 11KV and 33 KV maintenance, investment towards capex etc.

11. Grievance Real-Time Response - Initiated to address and respond to grievances of consumers on a real-time basis on the TPWODL Twitter page and CM Grievance.
12. Mo-Sarkar Visitor Management System – Initiative taken to re-start Mo-Sarkar Visitor Management System, which is aimed at reaching the general public with the objective of receiving their feedback on the programs of the Government.
13. Arrear Recovery Plan – Initiative taken for deploying business associates in different Circles for arrear recovery of HT-EHT, 3 Phase and Single-phase PD, and TD status consumers.
14. Disconnection notice generated automatically along with monthly bill of 3 Phase consumers having arrears more than 5k. The same followed-up regularly for arrear recovery & disconnection.
15. Automated Complaint flow to Bidyut Abhijog Sanchalak(BAS/TO)- CRM integration done for automatic Email and SMS trigger to TO desk for NPS / O&M complaint resolution. Also, the Telephone Operator (TO) desk complaint closure mechanism is designed for proper close looping of the complaint.
16. Repeat Caller Pop-Up in CRM – If any repeat caller calls to the Call Center more than 2 times within 24 hours, a pop-up message will display in the agent CRM screen "Repeat Caller-Handle with Care". This will help agents to identify repeat callers and they will handle the consumer with extra care. This will avoid further escalation and improve customer satisfaction.
17. Real-time outage information – Integrated platform designed at the Call Centre to inform consumer regarding planned and emergency breakdowns. Also expected time of restoration of supply is informed to consumer.
18. Interactive WhatsApp Service (8114393836) – Consumer can download duplicate bills, register their complaints, update their contact details, and also can chat live with our executive 24x7 even on holidays.
19. Queue Management System, Bill Print, and Cash Deposit facility at Customer Care Centres.
20. Senior Citizen Desk at Customer Care Centers to provide priority services to senior citizens the desk has been set up.
21. Jan Jagaran Journey (A Consumer Service Camp) at Customer Care Centers for addressing consumer requests, complaints, and queries on the spot, camp is organized in locality for better consumer outreach.

22. Digital Services Stickering and GP Meets - As a new move towards "Digital Payment Promotion, Collection & My Tata Power App Registration "TPWODL Customer Service team took the initiative to paste a sticker showing "TPWODL Digital Services" on meter box and carried out consumer Meets at Gram Panchayat level for spreading awareness about Digital Services, Online payment avenues, Energy conservation, Safety awareness, Dangers of hooking and unauthorized use of Electricity.

Additional A&G Cost for FY 2024-25.

S.No	Description	Amount (Rs. Cr.)
1	Energy Audit	0.048
2	Call Centre Addnl. Cost	3.84
3	GIS, SCADA, Communication, OT, Data Charges	14.19
4	IT automation	5.65
5	Meter Replacement (Recurring costs other than meters)	3.22
6	Loss Reduction	4.33
7	Re-establishment of Energy Police Station	5.06
8	Enforcement activities	5.05
9	**Total**	**41.40**

Additional expenses for FY 2024-25 are projected at **Rs 41.40 Cr.** taking into consideration the above initiatives which may kindly be considered.

2.6. Repair & Maintenance Expenses

In the vesting order Hon'ble Commission vide para 53(d) has directed that:

> "*…with regards to R&M expenses, the Commission shall allow in the Aggregate Revenue Requirement, R&M expenses incurred on the existing assets transferred to TPWODL as well as assets created out of grants which are not reflected in the books of WESCO utility subject to prudence check by the Commission, as per existing practice."*

Accordingly, Assets transferred as on effective date i.e Dec-20 balance sheet of erstwhile Wesco utility is Rs.1964.79 Cr. This includes Land cost of Rs. 1.77 Cr. As per license condition, the new operating Company TPWODL only retains the operational use of Land for the purposes of carrying out distribution business. As per terms of vesting order, land has been given on lease basis for a nominal consideration of Rs.1 per year. So, balance asset as on effective date is Rs.1963.02 Cr. The assets added by TPWODL during Jan-21 to March-21 is Rs.0.28 Cr. Therefore, opening GFA as on March-21 became Rs.1963.30 Cr.

Subsequently, upon further additions of assets by TPWODL, the opening GFA as on 1st April-22 is Rs. 2353.58 Cr.

Now as per new Regulation for Determination of Wheeling & Retail Supply Tariff, 2022. As per provision of new Regulation vide following para;

"3.4.1. *The following nature of work carried out by the Distribution Licensee shall be classified under this category:*
a. Works after obtaining a part or all of the funds from the users in the context of deposit works;
b. Capital works undertaken by utilising grants received from the State and Central Governments, including funds under various schemes;
c. Capital investment from the depreciation to be allowed on the asset of the erstwhile DISCOMs as on effective date in terms of the provisions of Vesting Orders
d. Any other grant of similar nature and such amount received without any obligation to return the same and with no interest costs attached to such subvention.
3.4.2. The expenses on such capital expenditure shall be treated as follows:

a. normative O&M expenses as specified in these Regulations shall be allowed*;*

…………………….."

In line with vesting order as well as new regulation, for R&M purposes assets are grouped under the following major category;

i) Assets transferred to new licensee as on effective date (this also includes some grant & consumer contribution assets.

ii) Assets created by the licensee itself through own capital investment.

iii) Addition of consumer contribution assets post vesting period through deposit work mechanism

iv) Assets executed through Grant of central and state govt funding but not appearing in the books of DISCOMs.

Para 3.9.19 of the Tariff Regulations, 2022 provides as under:

"*3.9.19 Repair and Maintenance expenses shall be allowed as a % of opening Gross Fixed Assets (GFA) only on assets owned by the distribution company, for each year of the Control Period as provided in the table below:*

DISCOMs	TPCODL	TPWODL	TPNODL	TPSODL
FY 23-24	4.20%	4.50%	4.50%	5.40%
FY 24-25	4.00%	4.20%	4.20%	4.50%
FY 25-26	3.50%	4.00%	4.00%	4.20%
FY 26-27	3.00%	3.00%	3.00%	3.50%
FY 27-28 & onwards as per the directives of the Commission	3.00%	3.00%	3.00%	3.00%

Further, Regulation 3.9.22 of the New Regulations, 2022 provides as under:

"3.9.22. The Commission shall allow an amount for maintenance of assets added under State and Central Government Schemes @ 3.00% of the opening GFA of such assets. The Distribution Licensee(s) shall be required to separately submit to the Commission along with ARR, the details of assets taken into service under these Schemes."

Accordingly, the Licensee has computed the total entitlement (GFA) on own assets as on 31st March 2024 as appended below:

Particulars	**UoM**	**Mar-23**	**Mar-24**
Assets out of Consumer Contribution	Rs. Cr.	1147.90	1258.89
Grant Assets		479.86	636.61
Own Inherited Assets		868.08	873.76
Own CAPEX Assets		500.00	1137.00
Total GFA (Own Assets)		**2995.85**	**3906.25**

So, the Licensee has claimed R&M Expenses on the Opening Gross Block as on 31st March 2023 & 31st March 2024 of Rs. 2995.85 & Rs. 3906.25 Cr. @ 4.50% & 4.20% respectively amounting to Rs. 134.81 Cr. & Rs. 164.06 Cr. respectively.

Apart from the above TPWODL owned assets, there are assets created through Central Govt. & State Govt. assistance which does not appear in the Books of Accounts of the Licensee, but the Licensee maintains such assets. The details of such assets have been duly verified by OPTCL and the Minutes of meeting of the 1st meeting of committee for development of protocol for asset management of GoI/ GoO funded schemes held on 12.10.2023 was considered for updating the following table:

Particulars	**Sanctioned Amount (Rs in Cr.)**	**Assets as on 31st March-23 (Rs in Cr.)**	**Assets as on 31st March-24 (Rs in Cr.)**
ODSSP (I, II & III)	1145.92	899.45	1143.53
ODSSP (IV)	597.53	29.87	491.12
DDUGJY New	293.00	293.39	293.39
IPDS	216.00	223.11	223.11
DDUGJY (PGCIL)	496.70	685.37	685.37
DDUGJY (NTPC)	1035.00	1442.63	1442.63
RLTAP (District Administration)	90.00	80.00	80.00
Total	**3874.15**	**3653.82**	**4359.15**

The above assets are under the jurisdiction of TPWODL area across 48000 sq.km. of operation. While maintaining the assets (both preventive & breakdown) the Licensee has to maintain it without any discrimination. So, R&M entitlement for FY 23-24 & FY 24-25 on Opening GFA of Rs. 3653.82 Cr. & Rs. 4359.15 Cr. at 3% rate amounts to Rs. 109.61 Cr. & Rs. 130.77 Cr. respectively on Govt. owned assets.

Accordingly, the R&M entitlement for FY 2023-24 & FY 2024-25 as per Tariff Regulations, 2022 is computed below:

FY 2023-24:

S. No.	Particulars	Amount (Rs. Cr.)
1	Opening GFA as on 01.04.2023 for DISCOM owned assets	2995.85
2	Approved %	4.50%
3	R&M Expenses for DISCOM owned assets	134.81
4	Opening GFA as on 01.04.2023 for Govt. owned assets maintained by DISCOM	3653.82
5	Approved %	3.00%
6	R&M Expenses for Govt. owned assets maintained by DISCOM	109.61
7	**Total R&M expenses for FY 2023-24**	**244.43**

FY 2024-25:

S. No.	Particulars	Amount (Rs. Cr.)
1	Opening GFA as on 01.04.2024 for DISCOM owned assets	3906.89
2	Approved %	4.20%
3	R&M Expenses for DISCOM owned assets	164.09
4	Opening GFA as on 01.04.2024 for Govt. owned assets maintained by DISCOM	4359.15
5	Approved %	3%
6	R&M Expenses for Govt. owned assets maintained by DISCOM	130.77
7	**Total R&M expenses for FY 2024-25**	**294.86**

However, the R&M Expenses as per the entitlement is not sufficient for which the Licensee is seeking a deviation with the following reason and justification: -

The Licensee submits that comprehensive repair and maintenance is required in the areas of safety, system operation, distribution system and distribution services, centralized power system control center, civil structures, automation technology etc. R&M Expenses are mainly incurred by the Petitioner under 33 kV & 11 kV grid substation and lines (AMC & material), safety expenses, PSCC, SCADA, GIS, transformer and other equipment repairs, civil repair and maintenance, IT related and store related material handling.

It is submitted that ageing also plays an important factor in the distribution system. Due to ageing of the electrical equipment, power distribution system is plagued with problems of high failures. Also, if proper repair and maintenance is not carried out in time, it may lead to high failures in distribution transformers and sub-stations leading to interruption in power supply to the consumers.

Some of the key reasons for failures in distribution transformers are as given below:

a. Prolonged overloading
b. Oil pilferage or leakage
c. Non-topping up of oil
d. Single phasing
e. Improper size of fuses
f. No lightning arresters installed/faulty
g. Faulty earthing
h. Tree cutting
i. Improper sag in lines and miscellaneous maintenance reasons.

Timely and regular maintenance helps to reduce outages, lower costs, and increased energy efficiency. However, maintenance includes costs and it is the commitment of the Licensee to provide uninterrupted power supply to all its consumers.

Furthermore, the Hon'ble Commission in Tariff Order dated 23.03.2023 has viewed as under:

> *"130. …*
>
> *The additional expenses have also been allowed under R&M in view of the fact that that the approval based on the GFA is insufficient to meet the cost of R&M. The Commission has also taken into cognisance of the current year FY 2022-23 expenditure and found that* ***additional expenses are required to meet the committed obligations.*** *The Commission has therefore allowed additional expenses which must be utilised for the purpose envisaged in the Tariff Regulations, 2022. The Commission will prudently check such expenses made by the DISCOMs while allowing them in the Truing up."*

Also, initial phase of difficulties as well as prudent practice of selection of vendors through competitive bidding. It was delayed in awarding the contract in previous year and as a result AMC was not streamlined during previous year. As a result, the R&M Expense was low during FY 21-22. However, in FY 22-23 from the beginning all the expenses are being incurred.

Accordingly, the Licensee requests the Hon'ble Commission to allow **Rs. 37.56 Cr.** for FY 2023-24 & **Rs. 42 Cr.** for FY 2024-25 as additional R&M Expenses subject to prudence checks during Truing up and since FY 2023-24 is the first year of the Control Period to be in force, it is the request of the Licensee to allow the R&M entitlement of **Rs. 281.99 Cr.** for FY 2023-24 & **Rs. 336.84 Cr.** for FY 2024-25 (including additional R&M Expenses) considering the efforts put in by the Licensee to provide uninterrupted and safe supply to the consumers.

Justification of Repair & Maintenance Cost

The DISCOM, TPWODL, serves a population of around 90 lakh with a Customer Base of more than 27 lakh. With vast Distribution Area covering 48,373 sq. km across nine revenue districts of Odisha such as Bargarh, Bolangir, Deogarh, Jharsuguda Kalahandi, Nuapada, Sambalpur Sonepur and Sundergarh. It procures power from GRIDCO at 33KV at various supply points and maintains extensive 33KV, 11KV and LT overhead networks for distribution of electric supply over its entire area of operation. For making reliable power supply, along with prompt service to its consumers, establishment of 5 Circles and 17 Divisions, 57 Subdivisional offices, 201 Electrical sections has been created.

TPWODL receives electrical power at 33 kV level from 45 numbers of 220/33KV or 132/33 kV GSS substation (OPTCL) located within and in the vicinity of TPWODL operational area. TPWODL distributes the power at 33 kV / 11 kV / 440V / 230V depending on the demand of the consumers. Presently, there are 182 numbers of 33KV feeders with a combined circuit length of approximately 5549 CKMs supplying power to 312 numbers of 33/11 kV Primary Substation (Structures). The 33 kV supply is stepped down to 11 kV level through 694 numbers of 33/11 kV power transformers. 1189 numbers of 11 kV feeders emanates from the 33/11 kV primary substations having cumulative length of approximately 50406 CKMs and supply power to HT consumers connected at 11 kV level and other LT customers connected to 11/0.415 kV distribution substation. Approx. 76068 numbers of distribution transformers are installed in all five circles. The length of the LT network is approximately 65302 KMs. These LT feeders supply power to three phase and single-phase consumers.

With this objective of ensuring reliable power supply and ensuring best customer services to the end consumers, TPWODL requires expenditure for maintain the existing 33 kV, 11 kV, LT Network and its office building under “Repair & Maintenance” Head.. In order to ensure the Operation, repair and maintenance and upkeep of the existing network, TPWODL has proposed placed various AMC contract through competitive bidding process for 33 kV Operations, 33 kV Network , 11 kV network, DTR & PTR repair, Tower maintenance in the previous year and upcoming year. Additionally, various spares, repairs & OEM services is also proposed under Repair & Maintenance Head.

a) Civil infrastructure repair & maintenance:

Civil maintenance for offices, PSS, Store, Access Road need time bound maintenance, painting to ensure safe, and hygiene atmosphere. Maximum buildings are old and some of the buildings are more than 50 years of age and maintenance requirement is very high.

Following activities are covered under civil repair & maintenance:

1. Old Building Painting where paint is totally fed
2. Maintenance work of AC & sanitary item
3. Periodically cleaning of Septic Tank & Soak Pit
4. Replacing of Light Fittings
5. Shifting of material including scrap
6. Other Miscellaneous work.

b) 33 kV Network AMC:

33 kV Network AMC is placed for each circle through competitive bidding process, which covers following activities.

1) FEEDER MAINTENANCE

- Replacement of damaged poles/assistance for erecting structures during the breakdown. For towers, separate order will be placed. However, feeder will be restored by installing rail/joist poles.
- Replacement of corroded, cracked, flashed insulators (Disc/Pin). Trimming (off Line) of trees under/near the feeders on regular basis
- Attending to hotspots / replacement of joints
- Repairs and re-tensioning of conductors, G.I. Earth wire, providing of guard laces, stay wires. repairs to the earthing of the poles.
- Installation of lightning arrestors, in places, where the chances of lightning is very high, as per guidance of Division In charge.
- Thermo vision scanning to be carried out on periodic basis or on the instruction of Division in charge (without outage)
- Providing assistance in identification of tower/poles without earthing. Identification of locations where guard wires/cradle guards are required. The details would be sent to engineer-in-charge for needful action after the inspections are affected.
- To ensure Plan Maintenance Schedule for 5549 Ckm. lines.

2) PSS MAINTENANCE & TESTING

- Inspection, Preventive and Predictive maintenance, condition monitoring of all electrical equipment installed in Primary Substation S/S as per the schedule and check list provided by respective engineer in charge to ensure optimum performance.
- Improvisation at PSS i.e. adding Transformers, breakers, CRP, Switchgear and other equipments along with accessories (Control cable, MCBs, Switches, LED hooters etc.) It also includes cost incurred for Replacements, attending breakdown, Spares identification & Inventory mgmt.
- Inspection, maintenance, & restoration of Electrical equipment installed in PSS.
- Pre-commissioning Test, Post commissioning checks, Investigation Tests, Routine Testing of Electrical equipment.
- Transformer Oil Testing at NABL for chemical properties, DGA, furan analysis.
- DC System Maintenance for reliable DC Supply in PSS. Inspection of Battery and Battery Chargers services provided by AMC.
- Earthing System study, recommendations, and refurbishment of earthing
- Testing Equipment's calibration and repairing of the Kit.
- Repairing of defective relay through card repairs/replacement.

3) 11 kV NETWORK AMC

Presently 11kV contract includes combined activities related to Maintenance of LT & HT Network, Installation, replacement and shifting of single-phase meter, new connection upto 5kW, recovery and disconnection in TPWODL area.

TPWODL intend to deploy 11kV AMC contract to ensure better quality services to its esteemed consumers and also in order to improve the collection efficiency, disconnection being part of the existing contract needs to be strengthened in order to achieve desired targets of organization.

The following are the salient features and considerations which are considered for renewal of 11kV AMC contract for FY 24-25.

- In FY 22-23, Total number of 11kV feeders were 1130 no's while it is now increased to 1189 Nos till H1(FY 23-24). Also, total numbers of Distribution transformers in FY 22-23 were around 72769 while it is now increased to 76068 No's till H1(FY 23-24).

- Though a lot of work has been done in11kV and LT network which has also resulted into significant reduction of tripping. However, still a lot of work are required to be done to improve dilapidated state of network which requires ample resources to make robust, reliable and safe network system.
- Routine maintenance practice has now begun which has significantly improved Distribution Network health. So far we have covered high value DTs and now requires urgent attention to improve heath of lower rating DTs whose failure rate is very high. Hence, resources in terms of manpower, testing equipment's and vehicles would be required for condition monitoring and maintenance.
- Further, increased numbers of assets in tune of 5% in 11kV population and 5% in DT population requires to be maintained for which extra number of resources would be required to be placed.
- The Safety of human, animal and electrical equipment's is a big challenge in last one and half year we have strengthen safety processes but 100% usage of PPE is also a big concern. Hence, we are deploying dedicated safety personals and with all required PPE and other safety gadgets to the line staff. This will help to enhance and maintain safety culture in the organization.
- Other commercial activities like Meter shifting, Service line replacement, burnt meter/faulty replacement etc. would also be carried out on a day-to-day basis.
- As disconnection is a part of this AMC contract and now in order to achieve desired targets of organization, we need to strengthen disconnection by deployment of dedicated team and other resources in all 202 sections of TPWODL.
- To take care of the movement of the team, all the 17 Nos of divisions are provided with 24 Hrs., 16 Hrs. 12 Hrs. vehicles considering geographical locations, total number of sections and number of feeders per section etc. We have deployed total 168 Nos of 12 Hrs. vehicles, 60 Nos of 16 Hrs. vehicle and 57 Nos of 24 Hrs. vehicles in all 17 Nos of divisions of TPWODL. Due to the addition of 11KV feeders and new line additional resource would be deployed.

4) OPERATION OF PSS – 33 kV / 11 kV SUBSTATION:

All the 33/11 kV Grid substations Operations and Condition monitoring are being carried out 24X7 by various AMC Business Associates across TPWODL.

The major activities are as follows:

- Recording of the readings at periodical intervals including Feeder Metering Points as specified by Officer-in charge of Sub-station and maintaining them in the logbook. All log sheets and registers should be signed with their name by the concerned person on duty deployed by the Service Provider in every shift.
- carry out the operations like charging CBs circuit breakers and other equipment, issue of PTW to authorized person etc. and follow the SOP (Standard Operating Procedure) during PERMIT TO WORK
- Recording all tripping of Breakers and other events that occur in the order of sequence with the time of occurrence correctly and record them in logbook.
- Updating of interruption registers, Telephone Call Register, Data Book, Battery Register, Register of Inspection of Jumpers. Apart from the above, the Service Provider shall carry out the routine checks during the Contract period daily.
- Must attend to all emergencies that may arise during the contract period such as equipment failures, fire accidents etc., shall get acquainted with all the operations such as isolating transformers and other equipment etc.
- Periodical inspection and intimation for any defects, abnormality to PSCC/ maintenance team.

A. TRANSFORMERS:

1. Logging & reporting of oil level & leakages & recording temperatures of oil and winding.
2. Reporting un-usual internal noises.
3. Reporting relief diaphragm for cracks.
4. Reporting status of HG-Fuses and Section Fuses of Station Transformer for replacement by TPWODL.
5. Reporting the condition of silica gel and record in the Logbook.
6. Shall record hourly readings of temperature of oil and winding in the logbook.
7. Reporting for Release of gas from Buchholz relay during its operation.

B. 33/11 kV BREAKERS:

1. Reporting of healthiness of trip circuits, SF-6 Gas pressure, pneumatic and hydraulic.
2. Pressures and oil leakage, if any, and other works specified by the Officer of TPWODL.

C. SWITCH YARD:

1. Checking of the Yard at hourly intervals and note down & report unusual observations,
2. Defects, sparks, loose contracts, red hot spots, jumpers, abnormalities detected in the equipment and loose bolts & nuts etc. and informing the concerned officers of TPWODL.

D. BATTERIES:

1. Logging of specific gravity and voltage of pilot cells daily during morning shift and for all cells weekly once & observation shall be recorded in the logbook.
2. Logging/Checking of DC Earth leakage, physical condition of connectors and top up distilled water when required.

5) DTR & PTR Repair & Maintenance:

A. DTRs Installed NSTALLED IN TPWODL: Total **76068** DTRs are installed in TPWODL System.

a. Below Report shows Total DTs Installed in 3 Category E.g., Rural Urban & Agriculture.

Circle	Rourkela	Sambalpur	Bargarh	Balangir	Kalahandi
Urban	3255	2848	2503	2745	2910
Rural	7111	6565	7728	8812	8068
Agriculture	4454	4077	4674	5553	4765
Total	14820	13490	14905	17110	15743

b. Below details shows Capacity Wise DTs installed in TPWODL.

Circle Name	Capacity	Total DTs installed in our system
Rourkela	10 kVA TO 63 kVA	12615
	100 kVA TO 200 kVA	1640
	250 kVA TO 500 kVA	546
	630 kVA TO 1000 kVA	19
Sambalpur	10 kVA TO 63 kVA	10900
	100 kVA TO 200 kVA	1900
	250 kVA TO 500 kVA	657

Circle Name	Capacity	Total DTs installed in our system
	630 kVA TO 1000 kVA	33
Bargarh	10 kVA TO 63 kVA	12894
	100 kVA TO 200 kVA	1687
	250 kVA TO 500 kVA	314
	630 kVA TO 1000 kVA	10
Balangir	10 kVA TO 63 kVA	15015
	100 kVA TO 200 kVA	1861
	250 kVA TO 500 kVA	228
	above 500 kVA TO 1000 kVA	6
Kalahandi	10 kVA TO 63 kVA	13838
	100 kVA TO 200 kVA	1632
	250 kVA TO 500 kVA	267
	above 500 kVA TO 1000 kVA	6
Total		**76068**

B. Root cause analysis of DTs failure:

FY'21& 22 DTR failure Analysis – In FY'21 Total 3297 Nos. & In FY'22 Total 2268 Nos. DTRs mainly failed due to Overloading, Aging & M/s Vijai Electrical Make.

DTR. analysis category-wise	Reasons	FY'22-23(APR - MAR)			FY'23-24(APR - SEPT)		
		10 kVA TO 63 kVA	100 kVA TO 200 kVA	250 kVA TO 1000 kVA below	10 kVA TO 63 kVA	100 kVA TO 200 kVA	250 kVA TO 1000 kVA below
Urban	Over loaded	201	78	55	143	46	23
	Vijay electrical	117	45	0	95	29	0
	AGEING (15 YRS. ABOVE)	256	47	20	66	32	18
	GOOD Conditioned	71	8	7	36	7	4
Rural	OVER LOADED	322	140	14	258	155	14
	VIJAY ELECTRICAL	356	65	0	231	22	0
	AGEING (15 YRS. ABOVE)	272	122	10	134	62	5
	GOOD Conditioned	121	18	1	52	18	2
Agriculture	OVER LOADED	342	20	0	231	7	0
	VIJAY ELECTRICAL	178	0	0	0	0	0
	AGEING (15 YRS. ABOVE)	199	7	0	254	0	0
	GOOD Conditioned	47	4	0	169	0	0

C. REASON OF DTs FAILURE:

1) **OVER LOADING:** During field verification & system Reliability inspection it has been observed that many DTRs are overloaded above their capacity & which is the main Cause of DTR failure in Summer Season. In SAUBHAGYA/DDUGY/RGGVY Many DTs (16kVA to 25 kVA) are installed with new connections adding load on already installed DTRs. Every Year 20000 new connections given to our new consumer in various TPWODL area in Existing Distribution Transformer.
2) **AGEING:** In TPWODL System Many Distribution Transformers are Installed in near about 15 to 20 years back. These Transformers are failing because of over age and frequent faults in the system. These Transformers are either Not repairable or if repairable but having high No Load losses. Also, the cost of repair of these transformers are comparatively high as compare to new Transformer. which is also causing reliability of power supply to the Consumers. Hence instead of repairing these old age transformers it is better to replace with new one. Over aging is also impacting technical losses of the system.
3) **M/s VIJAI ELECTRICAL MAKE:** M/s. Vijai make DTRs installed During Earlier time & under DDUGJY/RGGVY, 12th plan are frequently failing since installation. These transformers are Also Having High losses and not repairable by Regular Vendors. Hence there is difficulty repairing these transformers due to complicated core arrangement and core design**.**

D. Details Of Over Loading, Ageing & M/s Vijay Electrical Failure Distribution Transformer Are as follows:

CIRCLE NAME	CAPACITY	OVER LOADED	VIJAY ELECTRICAL	AGEING
ROURKELA	10KVA TO 63KVA	1247	531	2705
	100 KVA TO 200KVA	365	157	793
	250KVA TO 500 KVA	58	23	114
	ABOVE 500 KVA TO 1000KVA	2	0	2
SAMBALPUR	10KVA TO 63KVA	1007	445	2226
	100 KVA TO 200KVA	410	184	921
	250KVA TO 500 KVA	71	32	161
	ABOVE 500 KVA TO 1000KVA	4	1	8

CIRCLE NAME	CAPACITY	OVER LOADED	VIJAY ELECTRICAL	AGEING
BARGARH	10KVA TO 63KVA	988	473	2366
	100 KVA TO 200KVA	497	237	1186
	250KVA TO 500 KVA	34	15	75
	ABOVE 500 KVA TO 1000KVA	1	0	2
BALANGIR	10KVA TO 63KVA	987	471	2158
	100 KVA TO 200KVA	646	312	1435
	250KVA TO 500 KVA	22	11	51
	ABOVE 500 KVA TO 1000KVA	1	0	2
KALAHANDI	10KVA TO 63KVA	955	461	2307
	100 KVA TO 200KVA	539	265	1327
	250KVA TO 500 KVA	25	12	60
	ABOVE 500 KVA TO 1000KVA	1	0	1
Total		**7860**	**3632**	**17898**

OTHER REASONS OF DTRs FAILURE-

Apart from above mentioned reasons there are some other reasons which affecting failure of DTs.

a) **Heavy Lightening:** TPWODL is high lightening prone area. Lightening strokes are regularly observed during Kal-baisakhi and normal rainy season also.

b) **Oil Level Low:** Many Old Transformers are also failing due to low Oil level by several years.

c) **Improper Earthing:** In several DSS either earthing system in not available or improper earthing has been done earlier.

6) <u>Spares for all repair and maintenance:</u>

Requirement of spares (11kV,33kV, VCB Spares etc.

11 kV Spares

TPWODL has around 76068 DTs and around approx. 33000 AB switches installed in its network. Now, in order to maintain these DTs and AB switches, we require spare parts like Male-Female contacts, Handles, Copper strips, lugs, studs, gaskets, Channels, brackets etc. Such spares are very critical as most of these assets are installed in systems for more than 15-20 years and it is utmost important to ensure reliability of supply to our esteemed consumers.

33kV Spares

33KV Overhead Network comprising of 184 Nos 33kV Feeders having total length of 5549 Ckt Kms spread in Geographical area of 48373 Sq. Kms. Following spares are required to maintain the reliability & availability of 33kV Feeders at various locations of TPWODL.

VCB Spares

In TPWODL, Total 2761 Nos of VCBs are installed. Circle wise break up of which is as follows:

Circle	Total Installed	Total Installed	Total Installed	Total Installed	Total Installed
	Rourkela	Sambalpur	Bargarh	Balangir	Kalahandi
11 kV	402	483	293	367	332
33 kV	209	225	152	145	155

VCBs of different make are installed in TPWODL system.

Circle	Total Installed	Total Installed	Total Installed	Total Installed	Total Installed	Total Installed
	Schneider Make	Stelmac Make	ABB Make	CG Make	L&T Make	Others Make
11 kV	412	356	443	93	653	205
33 kV	31	53	91	68	106	252

For a healthy system, it is important for VCBs to operate successfully during fault condition in order to isolate faulty network in minimum time. This saves the healthy equipment from abnormal conditions and also increases reliability of the overall system.

Most of the VCBs are obsolete and have served their useful life. Multiple operation of these VCBs during long run have resulted in failure of parts in some cases. This are parts of VCBs like Pole assembly, Complete mechanism, closing coil & tripping coil, Vacuum Interrupters which deteriorate in the long run and have tendency to malfunction.

It is recommended to maintain minimum stock of spares in store in order to rectify defective parts during preventive maintenance and also restore the system in minimum time during breakdown maintenance.

7) 33 kV TOWER MAINTENANCE

Presently TPWODL network consists of 645 Nos tower. Most of these towers are more than 50 years old and cross rivers, forest & serving critical load requirement of Rourkela, Sambalpur & other areas. Corporate civil design team were engaged to inspect the foundation of these towers. They observed that 40% of the tower are having poor foundation & structure. In a few areas tower legs are being cut (photo attached) and stolen. Considering the above conditions special maintenance activities are planned to repair and strengthen these Towers.

Special R&M & Emergency Unforeseen like KALABAISAKHI (33 kV & 11 kV river crossing & forest area Tower maintenance)	
Materials for Tower	Structure steel with Accessories
Services for Tower	Erection, Fabrication, Tower repair (Structural and CIVIL), Cleaning & painting
Pole Erection (33 kV)	Erection of 33 KV new Poles and Intermediate poles for emergency restoration (major Break down works)
Pole Erection (11 kV & DTR)	Erection of 11 KV new Poles, Intermediate poles & DTR for emergency restoration (major Break down works)

Accordingly, the total R&M Expenses claimed by TPWODL for FY 2024-25 is tabulated as under:

Sl.No.	Particulars	Ensuing Year (24-25) In Lakhs
1	Civil repairs & maintenance	30.00
2	Distribution line repairs & maintenance (Material)	778.54
3	33 kV Network asset AMC (other than Grid operation)	4377.11
4	11 kV & below Network assets AMC	13340.00
5	Consumer service maintenance	1485.00
6	Substation operations & maintenance (33 kV Grid operation & maintenance)	5120.89
7	Street lighting maintenance	28.65
8	Transformer maintenance	1525.78
9	Other repairs & maintenance	765.43
10	Special R&M (33 kV & 11 kV river crossing & forest area Tower maintenance)	6235.00
11	**TOTAL**	**33686.40**

The reason of special additional R&M for TPWODL:

To protect the life of wild animal recently Govt of Odisha has funded substantial amount more than Rs.200 crs towards Elephant corridor. In the past similar type of network assets also created under Wesco utility (now TPWODL). Hon'ble Commission is very much aware about the type of pole and requirement of network assets under dip forest area for this cause of action. Maintenance of such asset needs special equipment and skill also. TPWODL is having large part of forest among all the DISCOMs. So, Hon'ble Commission is requested to kind enough to sanction special R&M for maintenance of these assets.

Further, under Megalift scheme, Govt of Odisha has created substantial electrical assets to promote water for all. These assets are also far away from the PSS with longer span of connectivity and communication to maintain such assets more or same as like of Elephant Corridor. Apart from these, TPWODL area of operation constituting most of the hilly region where in electrical consumers are not to be deprived from their essential need like electricity. To maintain assets under hilly area can't be treated under equal footing as like of urban.

Therefore, the licensee once again requests before Hon'ble Commission to kindly consider our deviation and approves some additional amount under R&M for FY 2024-25.

2.7. Provision for Bad and Doubtful Debts

The Licensee while estimating the ARR for FY 2024-25 has considered the revenue from sale of power on accrual basis in line with the Commission's Order on ARR and Tariff Petitions. Considering the ground reality improvement of collection efficiency to the extent of desirable level i.e., 99% is not possible. However, the licensee is putting its best efforts for improvement of the same. Accordingly, for the ensuing year the proposed collection efficiency considered as 99%, which is also a challenging target.

Regulation 5.8.1 of the New Regulations, 2022 provides as under:

*"5.8.1 The Commission shall allow provisioning for bad debts as a pass through in the Aggregate Revenue Requirement, as a prudent commercial practice in the revenue requirement of the licensee. The Bad and Doubtful debt during this control period shall be allowed on normative basis of **1% of the total annual revenue billed for sale of electricity**."*

In terms of the above, the licensee has proposed the same as provisions for bad and doubtful debts as tabulated below:

S. No.	Particulars	FY 2024-25 (in Rs. Cr.)
A	Total Revenue	5751.16
B	Bad Debt (1% of A)	**57.51**

The Petitioner humbly requests the Hon'ble Commission to consider the same.

2.8. Depreciation

As per para 39 (h) of the vesting order *The capital investments made by TPWODL shall be allowed recovery of depreciation in line with the rates prescribed in Annexure-2 till the time applicable regulation is notified by the Commission. The depreciation rates specified in regulations shall prevail over the rates specified in Annexure - 2 as and when applicable regulation is notified by the Commission*.

Similarly, for assets transferred under transfer scheme shall continue to earn depreciation as per existing norms approved by Hon'ble Commission. It has been directed in the vesting order vide para 39 (i) *Depreciation on all existing assets transferred to TPWODL shall be determined based on the existing methodology being followed by the Commission.*

Now as per Tariff Regulations, 2022 vide clause 3.8, the Licensee's entitlement of depreciation has been enunciated as under:

a. For the assets of erstwhile DISCOMs transferred to the new DISCOMs through the Vesting Orders, depreciation shall be calculated on the pre-up valued cost of assets at pre-1992 rate on the asset base approved by the Commission.

b. For assets achieving date of commercial operation (COD) in the control period, depreciation shall be computed annually based on the straight-line method at the rates specified in the Annexure II to the New Regulations, 2022.

Accordingly, depreciation on assets transferred under segregation order has been calculated in Straight Line Method (SLM) at pre-92 rates and for assets created by the licensee has been calculated @ rates prescribed in the Annexure-2 of New Regulations, 2022.

Type of Assets	**Dep rate applicable to transferred assets with-Pre 92**	**Dep rate applicable for TPWODL created assets as per New Regulations, 2022**
Land	0%	0%
Building	1.80%	3.34%
Network Assets	3.80%	4.67%
Overhead Lines	3.80%	4.67%
Furniture's & Fixtures	4.55%	6.33%
Vehicles	12.86%	9.50%
Office Equipment	9%	6.33%
IT Equipment's	9%	15%
Software		30%

Further as per vesting order para no. 44 a(iii) *"No depreciation shall be allowed to be recovered on assets created out of Government grants/capital subsidy/capital contribution from consumers irrespective of whether the corresponding grant is transferred to TPWODL or not."*

Accordingly, the Licensee has computed depreciation for the ensuing year FY 2024-25 based on depreciation rate applicable for TPWODL created assets as per Tariff Regulations, 2022 as under:

Particulars	**Dep on old assets (@ pre-92 rates)**	**TPWODL assets (@ new regulation)**	**Total for FY 24-25**
Land	0	0	0
Buildings	28.84	354.17	383.01
Network assets	2368.04	7568.00	9936.04
Overhead lines	4993.83	2387.02	7380.85
F&F	9.18	53.19	62.37
Vehicles	6.18	55.74	61.93
O/E	21.90	252.52	274.42
IT Equipment's	45.18	963.80	1008.98
Software		769.80	769.80
Total	**7473.14**	**12404.25**	**19877.40**
Depreciation on Consumer contributed assets			7279.00
Dep Considered			**12598.40**

Further, in the Tariff Regulations, 2022 it has been mentioned that the Licensee can calculate depreciation on the assets created during part of the year considering opening balance and closing balance average. In similar line depreciation on assets to be capitalized during the ensuing year has been calculated.

The Hon'ble Commission is requested to kindly consider the depreciation of Rs.125.98 Cr. for the ensuing years as calculated above, which may kindly be approved.

2.9. Interest Expenses

The Licensee has calculated the interest on loan for capex works and working capital has been calculated as per normative provision of Hon'ble Commission.

2.9.1. Interest on Loan for Capex works

The Hon'ble Commission has approved Rs. 333 Cr. towards CAPEX for FY 2021-22 vide order dt. 18th Sep-21, Rs. 477.72 Cr. for FY 2022-23 vide order dated 8th July 2022 & Rs. 381.91 Cr. for FY 2023-24 vide order dated 21.06.2023. To execute the same, the Licensee has to arrange fund with debt-to-equity ratio of 70:30. Accordingly, the loan has been estimated as Rs.223.79 Cr. for the year FY 2023-24 to be arranged from banks/financial

Institution. Similarly, for FY 2024-25, the Licensee has a capital investment plan of Rs. 571.96 Cr. The detailed Capex plan has already been filed with the Hon'ble Commission separately. With the above proposed Capex, the Licensee also requires loan from different banks/financial institutions for an amount of Rs. 356.66 Cr. with the debt-to-equity ratio of 70:30. The proposed rate of interest has been considered as 8.50% p.a. for the current year and 11.60% p.a. (10.10% + 1.50%) has been considered for the ensuing year. Therefore, the interest on loan for FY 24-25 has been proposed as Rs. 45.10 Cr. net of capitalization may kindly be approved.

For the ensuing year 2024-25, the repayment of loan has been taken as 30%.

2.9.2. Interest on Working capital Loan

As regards to interest on Working capital the Licensee has relied upon the following regulation of Hon'ble Commission -

Regulation 3.10 of the OERC Tariff Regulations, 2022 provides for Interest on working capital as under:

> *"3.10.1. The Distribution Licensee shall be allowed interest on the estimated level of working capital for the Wheeling and Retail supply business for the Financial Year. The working capital for the purpose of ARR calculation shall be computed as follows:*
> *a. Operation and maintenance expenses for one month; plus*
> *b. Maintenance spares @ twenty (20) % of average R&M expense for one month; plus*
> *c. Power Purchase Cost for one (1) month."*

The Licensee, in accordance with the above Regulation has computed the normative interest on working capital as under:

S. No.	Particulars	FY 2024-25	Average for 1 month	Maintenance spares @ 20% of R&M for 1 month	Working Capital as per Reg., 2022
		(Rs. Cr.)	(Rs. Cr.)	(Rs. Cr.)	(Rs. Cr.)
1	O&M Expenses	852.36	71.03		71.03
2	Gross Power Purchase Cost	4770.69	397.56		397.56
3	R&M Expenses	336.84	28.07	5.61	5.61
4	**Total monthly requirement**				**474.20**
5	Rate of Interest for Working Capital @ 13.10% *				13.10%
6	**Interest on Working Capital**				**62.12**

Base rate of 10.10% (as on 15.06.2023) plus 300 basis point

Also, the total interest on account of other borrowings is Rs, 5 Cr. for FY 2024-25. Accordingly, the proposed working capital interest of Rs. 67.12 Cr. (Rs. 62.12 Cr. + Rs. 5 Cr.) may kindly be approved.

2.9.3. Interest on Security Deposit

Section 47(4) of the Electricity Act 2003 states that "The distribution Utility shall pay interest equivalent to the bank rate or more, as may be specified by the concerned State Commission, on the security referred to in sub-section (1) and refund such security on the request of the person who gave such security."

The OERC Distribution (Conditions of Supply) Code 2019, Regulation (57) also mandates the payment of interest on consumer security deposit, the manner in which it is to be administered and penal provisions for delay in making such payments.

The Licensee has calculated the interest on security deposit @ 6.75% on the closing balance of security deposit amount for FY 2023-24 based on the existing approval of Hon'ble Commission. The interest on security deposit considered in ARR for FY 2024-25 is to the tune of Rs. 85.89 Cr.

2.9.4. Interest on carrying cost

As per Tariff Regulation, 2022 of Hon'ble Commission vide para

> *"2.11.5 …………*
> *c. Carrying cost to be allowed on the amount of Revenue Gap or Revenue Surplus for the period from the date on which such gap/surplus has become due, i.e., the interest should be calculated for the period from the middle of the Financial Year in which the revenue gap had occurred upto the middle of the Financial Year in which the recovery has been proposed, calculated on simple interest basis at the weighted average Base Rate of the respective Financial Year or any replacement thereof by SBI from time to time being in effect applicable for 1 year period, as applicable for the relevant year."*

The SBI base rate of 8.70 % would be the prevailing rate for claiming/offering interest on carrying cost. As per the estimation for current year the licensee would generate revenue surplus, which will be adjusted with the ensuing year GAP. Therefore, on the estimated surplus amount the Licensee has offered carrying cost @ 8.70 % on Rs.6.76 Cr. amounting to Rs.0.59 Cr.

2.9.5. Total Interest for Financial Year FY 2024-25

The total interest expenses estimated for FY 2023-24 is given in following Table:

Summary of Interest Expenses

		Rs. In crs.
1	Interest on loan for Capex	45.10
2	Interest on loan for working capital	67.12
3	Interest on Security Deposit	85.89
4	**Total Interest for ARR**	**198.11**

The total interest chargeable to revenue proposed by the Licensee for the year FY 2024-25 is Rs 184.58 Cr. (Rs. 198.11 Cr. – Rs. 13.53 Cr." Interest Capitalized").

3. CAPITAL EXPENDITURE PROGRAMME

3.1.1. CAPEX FOR CURRENT YEAR

As per commitment in the bid document and subsequent direction in the vesting order TPWODL submitted it's CAPEX plan before Hon'ble Commission on 10th Feb-21 for an amount of Rs.462 Cr. Hon'ble Commission has approved the capex plan of the licensee vide order dt. 18th Sep-21 in case no.7 of 21 for an amount of Rs.333 Cr. Subsequently for FY 22-23 & FY 23-24, Hon'ble Commission has approved for an amount of Rs.477.72 Cr. & Rs. 381.91 Cr. respectively. Cumulatively till FY 23-24, total capex approved is Rs. 1192 Cr.
As per para 39 (b) of vesting order TPCL has capital investment plan for Rs.1663 Cr. in a span of 5 years in the following manner.

Rs. In Cr.

FY 21-22	FY 22-23	FY 23-24	FY 24-25	FY 25-26	TOTAL
306	500	333	322	202	1663

To allow flexibility Hon'ble Commission vide para 39(c) has permitted the cumulative capital expenditure plan in the following manner:

Up to 31st March-22	Up to 31st March-23	Up to 31st March-24	Up to 31st March-25	Up to 31st March-26
306	806	1139	1461	1663

In compliance with the above, the Licensee has already prepared its capex plan for FY 24-25 and FY 25-26 and has submitted separately for kind approval of Hon'ble Commission. The Licensee had filed the CAPEX plan for FY-25 & FY-26 on 30th Oct-2023 which has been registered as Case No. 101/2023 and the Hon'ble Commission heard the proposal on 28th Nov, 2023 and the same has been reserved for order.

As regards to progress of capex for FY 21-22, FY 22-23 & FY 23-24 is concerned it is appended below for kind perusal of Hon'ble Commission

FY 21-22							
Particulars	**Description**	**OERC Approved Budget**	**Capitalized out of Actual CAPEX**	**Actual**	**WIP**	**Balance**
		(Rs. Cr.)				
Statutory, Safety And Security	Earthing, Fencing and boundary wall	55.54	52.57	55.15	0.31	0.08
	Life enhancement of feeder network in respect of maintaining safe horizontal / vertical clearances	20.54	17.52	19.18	0.89	0.47
	Meter Testing Lab	10.35	9.31	9.51	0.65	0.19
	Provision of Safety Equipment & PPEs to workforce	12.05	11.75	12.04	0.00	0.01
Sub - Total		**98.48**	**91.14**	**95.88**	**1.85**	**0.75**
Loss Reduction	Energy Meter replacement	4.08	3.14	3.96	0.05	0.07
	Refurbishment /augmentation of 33 kV/ 11 kV/ 0.415 kV network to reduce Losses	38.40	35.60	36.83	1.41	0.16
Sub - Total		**42.48**	**38.74**	**40.79**	**1.46**	**0.23**
Network Reliability	Augmentation of LV side protection System along with DT LA	12.45	12.34	12.42	0.03	0.00
	Installation of AB switches/ Isolators/Insulators on 33 kV and 11 kV Network	14.30	12.26	13.07	0.91	0.32
	Pilot Project for Installation of Fault Passage Indicator (FPI)	2.00	0.00	0.00	2.00	0.00
	Refurbishment/Life enhancement of 33/11 kV Primary Substation /Additional New Substations	20.16	12.52	14.77	2.39	3.00
Sub - Total		**48.91**	**37.12**	**40.26**	**5.33**	**3.32**
Load Growth	Network enhancement / Unforeseen emergency Capex requirement	39.71	32.55	36.32	2.96	0.43
Sub - Total		**39.71**	**32.55**	**36.32**	**2.96**	**0.43**
Technology And Civil Infrastructure	Infrastructure for Customer Care, Call Centre, Payment Centre, and Section Offices	2.04		0.00	0.00	2.04
	Admin	5.00	4.78	4.84	0.14	0.02
	CIVIL	23.62	23.13	23.22	0.33	0.07
	GIS Implementation	5.00	6.38	6.38	0.31	-1.69
	GSAS	9.52	5.97	6.71	0.58	2.23

FY 21-22						
Particulars	**Description**	**OERC Approved Budget**	**Capitalized out of Actual CAPEX**	**Actual**	**WIP**	**Balance**
		(Rs. Cr.)				
	IT & Technology for process efficiency	42.02	45.62	45.62	0.00	-3.60
	SCADA Implementation	15.30	15.16	15.16	0.14	0.00
	Security system in Central stores	1.05	1.01	1.01	0.04	0.00
Sub - Total		**103.55**	**102.04**	**102.94**	**1.54**	**0.00***
Grand Total		**333.13**	**301.60**	**316.19**	**13.14**	**3.80**

FY 22-23						
Particulars	**Description**	**OERC Approved Budget**	**Capitalization**	**Actual**	**WIP**	**Balance**
		(Rs. Cr.)				
Statutory, Safety And Security	Boundary Wall & Infrastructure	17.5	16.03	16.67	0.81	0.02
	Earthing and Fencing	15.5	9.42	11.41	2.03	2.06
	Life Enhancement of Network	15.09	7.63	12.07	1.71	1.31
	Testing and Safety Equipment	4.31	3.93	4.29	0	0.02
Sub - Total		**52.4**	**37.02**	**44.44**	**4.55**	**3.41**
Load Growth	Network Enhancement/unforeseen Emergency	145.57	74.64	90.7	45.71	9.16
Sub - Total		**145.57**	**74.64**	**90.7**	**45.71**	**9.16**
Loss Reduction	Energy Audit & Meter Related	13.52	1.26	5.42	3.65	4.45
	Replace-LT Bare conductor/ AB cable	30.08	22.77	25	5.08	0
	Spot Billing	3.2	0.23	1.19	0.01	2
Sub - Total		**46.8**	**24.25**	**31.61**	**8.74**	**6.45**
Network Reliability	Network Comp-33/11KV -Dist-Substation	14.6	5.52	11.18	2.79	0.63
	Network Components-33/11KV -Lines	52	28.47	34.26	15.1	2.64
	Network Components-33/11KV -Substation	51.74	20.93	35.57	9.72	6.45
Sub - Total		**118.34**	**54.92**	**81.01**	**27.61**	**9.72**
Technology And Civil Infrastructure	Infrastructure - Admin	1.5	1.50	1.49	0.01	0
	Infrastructure - Civil	18	13.31	16.47	1.44	0.09
	Infrastructure - Customer Needs	2.78	0.49	1.18	0.13	1.47
	Infrastructure - Stores	4.04	3.31	3.77	0.22	0.05
	IT & Technology	48.19	34.15	37.74	9.51	0.94
	OT-GIS/SCADA	40.1	15.18	15.18	24.79	0.13
Sub - Total		**114.61**	**67.95**	**75.83**	**36.1**	**2.68**
Grand Total		**477.72**	**258.79**	**323.59**	**122.71**	**31.42**

FY 23-24						
Particulars	**Description**	**OERC Approved Budget**	**Capitalization**	**Actual**	**WIP**	**Balance**
		(Rs. Cr.)				
Statutory, Safety And Security	Life enhancement of network and maintaining safe horizontal/ vertical clearances maintaining safe horizontal/vertical clearances	9.02	0.00	0.59	1.64	6.79
	Provision of Testing Equipment & PPEs to workforce	3.79	0.00	0.00	3.72	0.07
	Fencing, Boundary wall and Infrastructure works at Primary & Distribution substation	21.31	2.56	3.63	13.16	4.52
Sub - Total		**34.12**	**2.56**	**4.22**	**18.52**	**11.38**
Loss Reduction	Energy Audit & Meter related activity	27.04	0.00	1.76	3.59	21.69
	Replacement of LT Bare conductor with AB cable	31.96	0.34	7.53	5.94	18.49
Sub - Total		**59.00**	**0.34**	**9.29**	**9.53**	**40.18**
Network Reliability	Replacement/Addition of network component in 33/11KV Primary Substation	23.37	0.00	0.22	15.47	7.68
	Replacement/Addition of network component in 33KV & 11KV Line	36.08	0.09	1.63	3.13	31.32
	Replacement/ Addition of network component in Distribution Substation	10.03	0.00	0.40	0.32	9.31
Sub - Total		**69.48**	**0.09**	**2.25**	**18.92**	**48.31**
Load Growth	Network Enhancement/unforeseen Emergency	67.82	0.90	7.55	20.39	39.88
Sub - Total		**67.82**	**0.90**	**7.55**	**20.39**	**39.88**
Technology And Civil Infrastructure	IT & Technology Intervention	67.48	0.00	0.35	53.52	13.61
	OT-GIS Communication Other	62.21	2.07	2.38	41.79	18.04
	Improvement of Civil Infrastructure	15.65	0.36	2.38	9.98	3.29
	Infrastructure - Stores	4.35	0.01	0.01	0.58	3.76
	Infrastructure - Admin	1.80	0.76	0.94	0.54	0.32
Sub - Total		**151.49**	**3.20**	**6.06**	**106.41**	**39.02**
Grand Total		**381.91**	**7.09**	**29.37**	**173.77**	**178.77**

The License has proposed the following:

S. No.	Particulars	FY 24-25 (Rs. Cr.)	FY 25-26 (Rs. Cr.)
1	Statutory, Safety & Security	51.53	48.29
2	Loss Reduction	54.61	47.12
3	Reliability	156.09	119.53
4	Load Growth	218.27	124.95
5	Technology adoption & infrastructure	91.46	63.24
TOTAL		**571.97**	**403.13**

Major category wise proposed capex plan for FY 24-25 & FY 25-26 is appended below:

S. No.	Major Category	Activity	Works to be covered	Proposed Capex FY 24-25 (Rs. Cr.)	Proposed Capex FY 25-26 (Rs. Cr.)
1	Statutory, Safety and Security	i) Life enhancement of network and maintaining safe horizontal / vertical clearances	Intermediate Pole to Increase height for 11 kV and 33 kV Network.	5.74	5.00
			National Highway, SH & River Crossing with Guarding on 13m/14m/M+6 Type Tower- 33kV Pole (For NH & SH Crossing)	2.00	1.98
			Replacement of Open Conductor with Covered Conductor inside forest city and high-density public area.	2.00	2.00
		ii) Provision of Testing Equipment & PPEs to workforce	Testing equipment & Software.	6.28	5.00
			Safety Equipment (Discharge Rod, Neon Tester etc.)/ Virtual Reality uses for Switchyard Operation and Safety Training by PSCC Group/Man Lifter/ Tree Pruner (Battery Operated).	4.92	4.20
		iii) Fencing, Boundary Wall and infrastructure works at Primary& Distribution substation	Fencing of Distribution Substation.	8.50	8.50
			Boundary wall of Primary Substation.	9.00	9.00
			Gravel filling for Primary substation.	4.50	4.50
			Access road for inside and outside PSS.	3.00	3.00
			Civil work for control room/other building in PSS.	3.00	3.00
			Practice Yard.	0.60	0.40
			Provision for water supply for PSS/Offices (Watering for Earth pit).	1.00	1.00
			Earthing for PSS & DSS.	0.99	0.71
		Sub Total- Statutory, Safety and Security		**51.53**	**48.29**
2	Loss Reduction	i) Energy Audit & Meter related activity	Installation of 1Ph Smart Meter (Services - Meter Installation, Removal, Cable Installation, Removal, Attending Consumer Complaints, NSC, Shifting of Meters, Field Survey, etc) **- This excludes Meter Cost.**	12.00	12.00
			Installation of LI connections (3-Ph) with smart meter (Services - Meter Installation, Removal, Cable Installation, Removal, Attending Consumer Complaints, NSC, Shifting of Meters, Field Survey, etc) **- This excludes Meter Cost.**	5.00	2.50
			Installation of smart meters in place of Defective/faulty meters (BLE) (Services - Meter Installation, Removal, Cable Installation, Removal, Attending Consumer Complaints, NSC, Shifting of Meters, Field Survey, etc) - **This excludes Meter Cost.**	8.00	8.00
			Installation of CT PT MC MU & Testing.	12.00	12.00
			Installation of Metering Unit, Meters and Modems at PSS Boundary Points.	1.80	1.00
			DTR Smart Metering 100KVA & above.	3.00	0
			High Value Industrial Consumers Audit Point Metering & HT-LT check Metering.	1.00	0
			Printer and associated equipment's for Spot Billing.	0.88	1.62
		ii) Replacement of LT Bare conductor with AB cable	Replacement of LT Bare conductor with AB cable.	10.93	10.00
		Sub Total-Loss Reduction		**54.61**	**47.12**
3	Reliability	i) Replacement/A	PSS Modernization (Structure Replacement / Yard Renovation/Civil Foundation for VCB & PTR).	4.10	4.00

S. No.	Major Category	Activity	Works to be covered	Proposed Capex FY 24-25 (Rs. Cr.)	Proposed Capex FY 25-26 (Rs. Cr.)
		ddition of network component in 33/11KV Primary Substation.	Installation of 11 kV breaker/ Group Breaker to make it suitable for SCADA Operation (Segregation, replacement of obsolete breakers along with CT, PT, civil & control cable).	3.00	2.46
			Installation of 33 kV breaker/ Group Breaker to make it suitable for SCADA Operation (Segregation, replacement of obsolete breakers along with CT, PT, civil & control cable).	4.90	3.00
			Feeder protection-OC Relay & Control (BCPU).	1.56	0
			Replacement of Indoor Switchgear Panels along with associated equipment.	3.91	4.15
			Replacement of Substation Transformer -33/0.4 kV 100 KVA Trf.	1.53	1.06
			Replacement of Battery & Battery Charger/ACDB Panel/DCDB Panel.	0.73	0.54
			ERS Tower (Emergency Restoration Tower).	2.00	0
			Implementation of Automation/SCADA.	3.35	3.05
			Roof top for Office/ Building lighting/Solar Rooftop generation with Net metering & Emergency lighting.	3.00	0
			High Mast/Lighting arrangement for PSS/Store.	0.50	0.50
		ii) Replacement/Addition of network component in 33 kV & 11 kV Line.	Augmentation of old 11 kV line (for aged lines or to mitigate overloading/ undervoltage).	19.60	13.06
			Augmentation of old 33 kV line (for aged lines or to mitigate overloading/ undervoltage).	30.00	28.31
			Installation of 11 kV & 33 kV FPI/HIGH VOLTAGE O/H LINE INDICATOR, RLSU.	1.85	1.51
			Installation of 11 kV & 33 kV AB switches, Isolator & RMU.	14.93	11.34
			33 kV & 11 kV Polymer Insulator/ LA	3.00	2.91
			New Tower Addition/Replacement (Joda Tensa).	29.06	19.38
			Railway Crossing using U/G Cable.	4.00	3.00
			33 kV & 11 kV Auto Recloser & Sectionalizer.	12.11	12.67
		iii) Replacement/Addition of network component in Distribution Substation.	Remodelling of DSS (above 100 KVA DTR along with LT Protection, Earthing etc. other than Augmentation).	12.97	8.59
		Sub Total-Reliability		**156.09**	**119.53**
4	Load Growth	i) Network enhancement / Unforeseen emergency.	Construction of 33 kV New/Link Line.	70.00	62.66
			Construction of 11 kV New/ Link Line.	27.19	20.00
			Construction of new PSS/Renovation of Aged PSS.	70.00	0
			Addition/Augmentation/Replacement of PTR of various ratings.	8.05	6.36
			Addition/Augmentation/Replacement of DTR of various ratings.	7.19	7.00
			MCCB/ ACB Installation.	9.00	8.59
			Mobile DT &Mini Workshop (DTR, Breaker & Relays).	5.84	0
			Addition of New LT ABC Network.	16.00	15.34

S. No.	Major Category	Activity	Works to be covered	Proposed Capex FY 24-25 (Rs. Cr.)	Proposed Capex FY 25-26 (Rs. Cr.)
			Unforeseen Emergencies (Network extension for new connection, Kal baisakhi, Special Yatras etc.).	5.00	5.00
		Sub Total- Load Growth		**218.27**	**124.95**
5A	IT Infrastructure	i) Technology Intervention-IT & Technology.	Disaster Recovery Centre - HW & SW.	3.75	1.16
			DC Hardware & DC Software & Licences.	7.98	2.30
			Front End Devices and End user IT Infrastructure.	3.42	2.15
			Locational Network Strengthening.	1.48	0.83
		Sub Total- IT Infrastructure		**16.63**	**6.44**
5B	OT Infrastructure	ii) Technology Intervention-GIS, Communication & Others Implementation.	Implementation of GIS.	2.00	2.00
			Communication Infrastructure.	16.00	6.50
		Sub Total- OT Infrastructure		**18.00**	**8.50**
5C	Civil, Admin and Other Infrastructure	iii) Improvement of Civil Infrastructure.	Additional Material Storage area platform & road.	3.00	2.00
			New store building/shed/HOTT & Energy meter Section in 5 circles for safety training.	3.00	3.50
			New Scrap Yard, Pole Storage location/MMG/Other Department Store.	2.00	1.50
			New Building for Division/ Subdivision/Section/Commercial Office./ including toilet facility/Guest House/Major Buildings/Furniture for New Building / renovated old building.	30.00	30.00
			Remodelling of Old Office Building including Toilet/Boundary Wall of Office Building /Peripheral Development work of Offices	8.00	7.00
			Fuse Call Centre / Customer Care.	1.00	1.00
		iv) Store Infrastructure & EV Vehicles.	Store infrastructure, Security System and fire Hydrant System in Store.	4.76	3.30
			Purchase of EV Vehicles and other vehicles for employees.	1.65	0
		v) Ready to use assets for Offices.	Ready to Use assets for Offices.	3.42	0
		Sub Total- Civil & Admin Infrastructure		**56.83**	**48.30**
		Sub Total-Technology & Infrastructure		**91.46**	**63.24**
GRAND TOTAL				**571.97**	**403.13**

3.1.2. CONSUMER CONTRIBUTION DEPOSIT WORKS

During the current year & ensuing year the Licensee is continuing & will undertake the various line augmentation, construction of new distribution s/s etc under consumer contribution scheme both private and Govt funded job. The estimated amount towards consumer contribution and govt deposit fund for FY 2023-24 & FY 2024-25 are as follows:

Scheme details	FY-23-24 (Rs. in Cr.)	FY 24-25 (Rs. in Cr.)
Deposit Works fund including Govt	180.00	180.00
Elephant Corridor (Phase IV)	20.00	20.00
School Anganwadi	20.00	3.00
Mega Lift	2.00	2.00
System Improvements	7.31	7.45
Total	**229.31**	**212.45**

3.1.3. Govt Grant Assets

The Licensee has considered Govt. grant assets in accordance with the Minutes of Meeting of 1st meeting of committee for development of protocol for asset management of GoI/GoO funded schemes held on 12-10-2023 at GRIDCO Conference hall chaired by ACS, Dept. of Energy wherein details of such assets used by DISCOMs as on 31-03-2023 has been provided (**ANNEXURE-I).** The assets created under Central & State Govt assistance not in the books of the Licensee are as under.

Particulars	Sanctioned Amount (Rs in Cr.)	Assets as on 31st March-23 (Rs in Cr.)	Assets as on 31st March-24 (Rs in Cr.)
ODSSP (I, II & III)	1145.92	899.45	1143.53
ODSSP (IV)	597.53	29.87	491.12
DDUGJY New	293.00	293.39	293.39
IPDS	216.00	223.11	223.11
DDUGJY (PGCIL)	496.70	685.37	685.37
DDUGJY (NTPC)	1035.00	1442.63	1442.63
RLTAP (District Administration)	90.00	80.00	80.00
Total	**3874.15**	**3653.82**	**4359.15**

3.1.4. Strengthening of Infrastructures in Elephant Corridor

The State Govt. has formulated a scheme named as Strengthening of Electrical Infrastructure inside Elephant Corridor in order to avoid elephant electrocution and to provide safe movement of elephants without any hazards from the existing electrical infrastructures in and around the defined Elephant movement corridors. State Govt. is releasing the funds in shape of grants to the DISCOMs for execution of works. The scope of works includes erecting of interposing poles, use of Spikes in Poles, Cooping, Fencing AB cabling of LT lines etc. The technical specification of materials is as per CAPEX. The qualities of execution are supervised by the Dist. Administration.

There were three phases of work under this scheme has been executed by the Wesco utility earlier. The incomplete job of third phase will be carried out along with 4th phase.

In 4th phase Govt of Odisha has proposed to spend around Rs.241 Cr. towards strengthening of Elephant Corridor work across the different areas of the utility. Accordingly, the work has been assigned through tendering process to various contractors for 84 packages. During the current year the utility expects to spend around Rs.20 Crs. During the ensuing year the balance amount of Rs.20 crs expected to be utilized towards Elephant Corridor and the project will be completed.

3.1.5. Strengthening Project (ODSSP)

Under ODSSP (I, II & III) scheme, the Licensee was allotted for 142 Nos of 33/11 kV substations with an estimated cost of Rs.1145.92 Cr for and the project has already been completed. Under ODSSP (IV), another Rs. 597.53 Cr has been sanctioned. In order to reduce the lengthy 11 kV lines and associated loss therein, the new 33/11 kV substations has been created. The existing 11 kV lines are accordingly linked from the newly created 33/11 kV substations to the nearby 11 kV lines. Considering the current progress, the Licensee has estimated Rs. 491.12 Cr. to be added during ensuing year FY 24-25.

3.1.6. MEGALIFT POINT BY GOVT. of ODISHA

As per the Govt Megalift irrigation scheme all the house hold would be facilitated with drinking water across the state. Accordingly, clusters have been defined under Licensee area. Under the scheme mostly separate bay extension work from the Existing 33/11 kV s/s or from ongoing ODSSP project 33/11 kV s/s is required to be made. There are 26 locations under the utility has been selected. For the current year Rs.2.00 Cr. and during the ensuing year only one project amounting Rs.2.00 Cr. has been estimated under deposit head.

4. Revenue and Current year GAP

4.1Non Tariff Income

The Utility has proposed Rs.386.02 Cr. as Non-Tariff Income for the ensuing year FY 2024-25. The details of Non-tariff income are as under :

i)Rebate on Power purchase	Rs.66.52 Cr.
ii)Supervision charges	Rs.20.00 Cr.
iii)Interest on FD	Rs. 80.00 Cr.

iv)Open access charges (CSS & wheeling)	Rs.180.00 Cr.
v)Misc. receipt	Rs.10.00 Cr.
vi)ODP	Rs.10.00 Cr.
vii)DPS	Rs. 9.50 Cr.
viii) Other incl. scrap	Rs. 10.00 Cr.
Total	**Rs. 386.02 Cr.**

4.2 Reasonable Return (ROE)

The Licensee submits that ROE @ 16% has been claimed amounting to Rs.135.24 Cr. on equity base of Rs.845.28 Cr. Provision towards Tax on equity has also been made at the rate of 25.17 % gross (Tax 22% + Surcharge 10% +Education cess 4%) amounting to Rs.45.49 Cr. which may kindly be approved. The Licensee & the stake holder also eligible for ROE on creation of capital assets through equity infusion (30% of Capex) accordingly the equity base has been calculated.

Equity as on 31st March-23 (As per audited accounts)	Rs.480.20 Cr.
Estimated capitalization during FY 23-24 Rs.637 Cr. (30%)	Rs.191.10 Cr.
Proposed capitalization during FY 24-25 Rs.583.79 Cr. (30%)	Rs.175.14 Cr.
Total Equity base on which ROE claimed	**Rs. 846.44 Cr.**

4.3. Current year FY 2023-24 GAP/Surplus

Further based on the actual sales, revenue and expenses for the first half of the current year 2023-24 and based on estimates for next half of current year, the revenue gap for FY 2023-24 is Rs.13.80 Crore as against surplus of Rs.59.27 Crore approved by Hon'ble Commission.

Statement of Current's Year GAP/SURPLUS

Parameters	Approved FY 23-24 (Rs. Cr.)	Estimated FY 23-24 (Rs. Cr.)
Power Purchase	13286 MU	13080 MU
Power Purchase Cost excl. BSP Surcharge	5528.46	5508.70
BSP Surcharge/ (Redn. In BSP)		351.94
Total Power Purchase Cost (A)	**5528.46**	**5860.64**
Distribution Costs (B)		
a) Employees cost	580.57	582.71

Parameters	Approved FY 23-24 (Rs. Cr.)	Estimated FY 23-24 (Rs. Cr.)
b) Repair and Maintenance cost	281.99	281.99
c) Admin. & General Expenses	158.12	191.09
d) Provision for bad and doubtful debts	62.52	62.83
e) Depreciation	72.93	91.58
f) Interest on CAPEX loans	45.57	23.42
g) Interest on Working capital	53.87	60.57
h) Interest on Security Deposits	72.06	78.18
i) RoE Net of Tax	57.59	107.41
j) Tax on ROE		36.13
k) Carrying Cost on Reg. assets/liabilities		(-) 1.78
l) Less Expenses capitalized (Emp + Int)	43.25	25.11
Total Distribution cost	**1341.97**	**1489.02**
TOTAL (A+B)	**6870.43**	**7349.66**
Less: Miscellaneous receipts	400.33	460.21
Less: True up/ Special Appropriation	**277.38**	**600.00**
Total Revenue Requirement	**6192.72**	**6289.45**
Revenue from tariffs (full year)	**6251.99**	**6282.69**
Revenue Gap (+) / surplus (-)	**(-) 59.27**	**6.76**

The Licensee has submitted that Hon'ble Commission may kindly to acknowledge the above factor accordingly.

4.4. Revenue at Existing Tariffs

The Licensee has estimated the revenue from sale of power considering the sales projected for FY 2024-25 and by applying the various components of existing tariffs. As detailed out in previous sections, the Utility has adopted the approach considered by the Commission and estimated the revenue from sale of power on accrual basis. The total revenue based on the existing tariffs applicable for the projected sales is estimated at **Rs 5751.16 Cr.**

The details of estimated revenue from different categories of consumers at existing tariffs are provided in Form T-7 & T- 8. The Licensee humbly requests the Hon'ble Commission to estimate the revenue for estimated sales at existing tariff by duly considering the category-wise and slab wise in the format prescribed by the Hon'ble Commission with the applicable tariffs in each category.

4.5. Summary of Annual Revenue Requirement and Revenue Gap(+)/Surplus(-)

Basing upon estimated Revenue Requirement and Revenue at existing tariff, the revenue Gap after using surplus from past true up of Rs. 600 Cr. for current FY 2023-24 is Rs.6.76 Cr.

Revenue Gap with AT&C (18.90%)-Current Year FY 23-24	
Parameters	**Estimated (Rs. Cr.)**
Power Purchase Cost excl. BSP surcharge	5508.70
BSP surcharge	351.94
Total Power Purchase Cost	***5860.64***
Distribution Cost incl. tax on ROE	1381.61
Reasonable return on ROE after tax	107.41
Surplus carried over from past True ups	(-) 600
Sub Total	**6749.66**
Revenue from sale of power at existing tariffs	**6282.69**
Non-Tariff Income	460.21
Revenue GAP(+)/Surplus (-)	**6.76**

Similarly, the Licensee has proposed the revenue gap for FY 24-25 considering the proposed AT&C loss of 17.41% and using surplus from past true up of Rs. 371.12 Cr. The revenue gap proposed is Rs. 1.26 Cr.

Revenue Gap with AT&C (17.41%) FY 24-25	
Parameters	**Rs Cr**
Power Purchase Cost (BSP @ Rs. 3.90/ u)	4770.69
Distribution Cost incl. tax on ROE	1603.44
Reasonable return on ROE after tax	135.43
Surplus carried over from past True ups	371.12
Sub Total	**6138.45**
Revenue from sale of power at existing tariffs	**5751.16**
Non-Tariff Income	386.02
Revenue GAP(+)/Surplus (-)	1.26

That, in the above background it is worth mentioning that as of now, at existing tariffs, the company through additional sale & proposed tariff rational measures along with use of surplus from past period true ups will meet the required ARR without any tariff hike. However, Govt support and subsidy if any shall be an additional help & will be passed on to the consumer.

5. Compliance to Directives of Hon'ble Commission

5.1 Compliance to the directions under RST Order:

Hon'ble Commission has given certain direction in the Retail Supply Tariff (RST) Order dt.23.03.2023 and compliance to same are as under: -

1) **Para No. 79-** The Commission has reviewed the application of the Business Plan of licensees and approved the ARR for FY 2023-24 (i.e. first year of the present control period). The Commission directed to submit the business plan for the balance control period by 30th April 2023.

   Compliance: The Business Plan for the first control period FY 24-25 to FY 27-28 was filed with the Hon'ble Commission on 07-06-2023 and subsequently registered as Case No. 44 of 2023. The Hon'ble OERC granted approval for the Business Plan for FY 24-25 to FY 27-28 for all DISCOMs through a consolidated order dated 14-09-2023.

2) **Para No. 86 and 243 (c) -** The Hon'ble Commission has directed the licensees to complete the energy audit in HT segment early and find out actual HT loss. Once energy audit is completed DISCOMs will be required to reduce HT loss, if required by technical intervention.

   Compliance:

   In adherence to compliance measures, the evaluation of actual HT Loss has been systematically conducted through the following steps:

   a) All 33 kV feeders (192nos.) are metered & enabled with AMR.
   b) Out of the total 1177 11 kV feeders, 1129 are currently outfitted with accurate meters. TPWODL has devised a plan to finalize the installation of Current Transformers (CT) and Potential Transformers (PT) at the remaining defective metering units by December 2023.
   c) Within TPWODL's jurisdiction, comprising 76797 Distribution Transformer Centers (DTRs), a prioritized approach has been undertaken. Of these, 10773 DTRs with a capacity of 100 kVA and above have been selected for the installation of Smart meters. As of now, 2303 DTRs have successfully undergone Smart meter installation, and the

remaining metering will be completed by March 2024. Subsequent to this, audit activities will commence based on Geographic Information System (GIS) mapping.

d) GIS tagging of consumers has been taken with the aim of completing the tagging process by March 2024. Currently, GIS tagging has been successfully accomplished in one circle (Rourkela) and two divisions (Jharsuguda & Bargarh West).

TPWODL has taken various steps to assess LT & HT losses:

a) Smart Metering of High-value consumers at DTRs, LT side is under progress.
b) Currently Audit activities are carried out in Commercial buildings/ Apartments / Industrial areas where substantial load persists.
c) The Audit Application is integrated with GIS, FG and MDM to ensure a seamless and accurate evaluation, minimizing manual intervention.

3) **Para No. 243 – (a)-** to provide the norms for engaging the outsourcing personnel through Business associates, details of number of outsourcing personnel at each division & circle level and works/responsibilities assigned to them.

Compliance: - TPWODL engages its Business Associates through a transparent & competitive open bidding process for a particular period of time. The bidding document clearly states the Category-wise (i.e. Un-skilled, Semi-Skilled, Skilled & High Skilled) resource requirement. Also, it clearly defines the required Skill Set, Qualifications and Experience for the individual roles as per the norms and guidelines. Apart from the mandatory qualification (technical and financial) criteria, the bidders/vendors need to submit the valid proof of documents in support of the desired skill set, qualification and experience of each proposed personnel/resource. Accordingly, the bid evaluation committee evaluates the bids by adopting methods like Least Cost Selection (LCS)/ Quality-cum Cost Based Selection (QCBS) as the case may be. Further, negotiation is also been conducted before placing the final order to the selected Business Associates.

4) **Para No. 243 – (b)-** to provide present status and future planning for creation of dedicated industrial feeders with adequate protection system for providing reliable power supply.

   Compliance: - To provide reliable Power Supply N-1 redundancy is desirable. So, for improvement in N-1 redundancy at 33 kV level additional 22 High Revenue Feeders (Industrial) have been added through CAPEX, bringing the total to 57 such feeders. Similarly, for improvement at the 11 kV level, the number of N-1 compliant high revenue feeders has increased to 130, up from the previous count of 108. Additionally, 45 Model DSS (Distribution Substations) have been created to further reinforce the N-1 redundancy framework.

5) **Para No. 243 – (d)-** to submit valuation of distribution assets under operation in their area of supply segregating them into three broad categories i.e. existing assets before taking over, assets created after taking over by present DISCOMs and assets created under Govt. funding before & after taking over of distribution business by the present DISCOMs.

   Compliance: - Assets, which were transferred through vesting order and subsequently created, are duly recorded in the Company's books of accounts. The Audited Financial Statements, inclusive of data up to FY 22-23 and H1 FY 23-24, have been submitted to the Hon'ble Commission for review. Notably, assets funded by the government do not directly appear in the Company's financial records. However, the Licensee is asserting Repair and Maintenance (R&M) expenses based on data derived from OPTCLs/GRIDCOs.

6) **Para No. 243 – (e)-** to create robust consumer database by introducing KYC mechanism and other method to identify genuine consumer(s) & eliminate bogus consumer(s).

   Compliance: -

   TPWODL has implemented a comprehensive strategy to build a robust consumer database, incorporating various measures for data sanitization:

   a) The Call Centre team conducts daily data sanitization outcalls to validate consumer contact details.

b) Mobile numbers and Email IDs undergo data sanitization through inbound calling.

c) Email Verification is executed by "Thank You mailers".

d) WhatsApp Number verification is conducted via the "Green Bill Drive".

e) Mobile numbers and Email IDs are collected through Twitter and the E-Care desk.

f) An E-Bill opt-in drive has been initiated specifically targeting Three Phase & HT EHT consumers.

g) Email IDs and Mobile numbers are updated through IVR.

h) The "Jan Jagran Journey" initiative focuses on instant sanitization of mobile numbers and Email IDs.

i) Contact details of Government & Institutional consumers are verified and sanitized through physical visits.

j) The "E-Darpan" initiative captures consumer contact details from walk-in consumers at Customer Care Centres.

Summary of Data Sanitization completed with Mobile Numbers:

Total live consumers as on Sep-23	**Data Sanitization Completed (1 Phase Consumer)**	**Data Sanitization Completed (3 Phase Consumer)**	**Data Sanitization Completed (HT & EHT Consumers.)**	**Total Data Sanitization Completed**
2058897	718270	43000	1455	762725

7) **<u>Para No. 243 –(f)-</u>** to consider consumer-licensee interaction meetings to address consumer complaints and grievances and create a consumer-friendly environment.

<u>Compliance: -</u>

GP Meets:

In a proactive step towards enhancing consumer awareness, the TPWODL Customer Service Team conducted outreach activities covering 258 Gram Panchayats, engaging with over 2 lakh consumers. The team disseminated information on various topics including complaint resolution, benefits of digital payments, utilization of the My Tata Power Application, energy conservation practices, safety awareness, and the risks associated with unauthorized use of electricity. This initiative facilitated direct interaction with consumers, addressing their requests and queries for a more informed and empowered consumer base.

Digital Service Stickering – A part of Digital Literacy Campaign:

In a fresh initiative aimed at promoting "Digital Payment, Collection, and My Tata Power App Registration," the TPWODL Customer Service team proactively affixed stickers labeled "TPWODL Digital Services" on consumer meter boxes. This strategic move saw the placement of approximately 87,000 stickers at consumer premises spanning across 9 districts. This effort serves to raise awareness and encourage consumers to engage with digital services offered by TPWODL for enhanced convenience and efficiency.

Mo Sarkar Visitor Management System – At TPWODL offices:

The initiative is geared towards instilling professionalism and fostering behavioural change in TPWODL offices, employing a direct and random feedback system from consumers based on their experiences. Under this initiative, when a consumer visits any TPWODL office, their phone number is registered in the MO-Sarkar Visitor Management Portal, ensuring their requests or queries are promptly addressed. Notably, this approach has successfully addressed the concerns of over 30,000 visitors, even in the post-lockdown period and amid Covid-19 restrictions, demonstrating the commitment to customer satisfaction and continuous improvement.

Govt. Consumer Visit Program:

To streamline processes related to bill submission, demand processing, and address key issues such as bill disputes and defective meter connections, the Government & Institutional (G&I) Cell was established. This specialized unit is adept at navigating the government structure, engaging with departmental heads, and interfacing with sanctioning authorities. Additionally, the G&I Cell conducts physical visits for data sanitization and gathers TPWODL service feedback.

Since its inception, the G&I Cell Team has made significant strides, visiting more than 40 government departments and interacting with over 1100 individuals. This underscores the cell's dedication to fostering effective communication, resolving priority issues, and ensuring the seamless operation of TPWODL services within the government and institutional sector.

E-Darpan (Consumer Visit at Customer Care Centres):

Transactional feedback has been initiated to systematically monitor the interactions of consumers visiting our Customer Care Centres. The feedback process encompasses evaluating the informational and behavioural attitude of our Customer Service Representatives (CSRs), assessing the awareness index of digital services, gauging the perception rating, and reviewing the office facility based on customer feedback. In order to solicit views on various parameters, an online form has been meticulously crafted and is an integral part of our comprehensive "Customer Feedback" mechanism.

It is noteworthy that a substantial number of consumers, exceeding 3.5 lakhs, have availed themselves of our services, visiting a total of 14 Customer Care Centres.

Senior Citizen Desk – (At Customer Care Centers):

Senior Citizen Desk at Customer Care Centers aims to provide specialized assistance and priority services tailored to the needs of elderly individuals with no need for them to stand in a queue policy.

Jan Jagaran Journey – Consumer Service Camp:

TPWODL CS & Recovery Team conducted a successful consumer service camp at the Kalibadi Customer Care Centre on 29th August, 2023, addressing over 100 consumer queries and grievances, while also promoting digital services like the My Tata Power App, Web portal and Miss-call pay. The event's positive outcome has prompted plans for its expansion to 5 Circles and 17 Divisions of TPWODL, showcasing our commitment to proactive customer service and the promotion of digital solutions.

5.2 **Vesting order Compliances:**

Hon'ble Commission has given certain direction in the Vesting order dated 28-12-2020 and compliance to same are as under: -

1) **Para No. 39 (d)-** The DISCOM has to obtain prior approval of Hon'ble Commission on the detailed Capital Expenditure plan in line with regulation.

Compliance: -

Sl. No.	Financial Year	Case Number	Date of Approval
1	FY 21-22	07/2021	18.09.2021
2	FY 23-24	101/2021	08.07.2022
3	FY 23-24	97/2022	21.06.2023
4	FY 24-25 & FY 25-26	101/2023	CAPEX application submitted on 27.10.2023

2) **Para 43 (d) –** Past arrear collection.

Compliance: - In adherence to the terms of the bid, TPCL has committed to recovering past arrears total Rs. 300 Crore until FY 2025-26. The company has been diligently complying with the specified mandate and as of October 2023, an amount of Rs. 310.40 Crore has already been remitted to GRIDCO, exceeding the committed recovery amount.

5.3 Compliance to OERC (Licensee's Standard of Performance) Regulation, 2004:

1) **Para No. 6(2) & 6 (3) –** Submission of Guaranteed Standard of Performance (GSoP) report on monthly (within 15 days of the close of the month) and annual (within 30 days of the close of the year) basis. In parallel, submission of Overall Standard of Performance (OSoP) report in every quarter and a consolidated annual report.

Compliance: -

The compliance details are as follows:

SL No.	Compliance	Letter No. & date of compliance
1.	Quarterly OSOP, Monthly GSOP and consolidated annual SOP report (GSOP & OSOP both) for FY 21-22.	TPWODL/RA&S/2022/078 dated 22.06.2022.
2.	Monthly GSOP and Quarterly OSOP for Quarter-I of FY 2022-23	TPWODL/RA&S/2022/095 dated 29.07.2022.
3.	Monthly GSOP Submission for July'2022	TPWODL/RA&S/2022/105 dated 24.08.2022
4.	Monthly GSOP Submission for August'2022	TPWODL/RA&S/2022/116 dated 17.09.2022

SL No.	Compliance	Letter No. & date of compliance
5.	Monthly GSOP for September and Quarterly OSOP for Q-II of FY 22-23 submission	TPWODL/RA&S/2022/128 dated 15.10.2022
6.	Monthly GSOP submission for October’2022	TPWODL/RA&S/2022/146 dated 14.11.2022
7.	Monthly GSOP submission for November’2022	TPWODL/RA&S/2022/146 dated 15.12.2022
8.	Monthly GSOP for December and Quarterly OSOP for Q-III of FY 22-23 submission	TPWODL/RA&S/2023/07 dated 11.01.2023
9.	Monthly GSOP submission for January’2022	TPWODL/RA&S/2023/018 dated 15.02.2023
10.	Monthly GSOP submission for February’2022	TPWODL/RA&S/2023/024 dated 14.03.2023
11.	Monthly GSOP for March and Quarterly OSOP for Q-IV of FY 22-23 submission	TPWODL/RA&S/2023/036 dated 12.04.2023
12.	Monthly GSOP submission for April’2023	TPWODL/RA&S/2023/50 dated 15.05.2023
13.	Monthly GSOP submission for May’2023	TPWODL/RA&S/2023/64 dated 16.06.2023
14.	Monthly GSOP for June and Quarterly OSOP for Q-I of FY 23-24 submission	TPWODL/RA&S/2023/82 dated 12.07.2023
15.	Monthly GSOP submission for July’2023	TPWODL/RA&S/2023/103 dated 11.08.2023
16.	Monthly GSOP submission for August’2023	TPWODL/RA&S/2023/117 dated 13.09.2023
17.	Monthly GSOP for September and Quarterly OSOP for Q-II of FY 23-24 submission	TPWODL/RA&S/2023/141 dated 12.10.2023

2) **Para No. 8-** Third party audit in order to monitor the compliance of the Standards by Licensees annually.

Compliance: - Following the Hon’ble Commission's directive, TPWODL has engaged three third-party auditors from the Commission's empanelled list to conduct the FY 2022-23 audit. The process is in accordance with Regulation 8 of OERC (License’s Standard of Performance) Regulation, 2004, and the Commission's specific instructions in the letter dated 22.02.2022 (OERC/Engg.-7/2018/171). The audit is ongoing and the report will be submitted upon completion of the audit activities.

5.4 Segregation/ Carve out order compliance: -

The licensee is to update the compliance status half-yearly and annual basis to the Hon'ble Commission as mandated in the Segregation/ Carve out order dated 23-11-2021. The series of intimation in this regard are provided below:

Sl. No.	Letter No.	Date	Compliance period
1	TPWODL/RA&S/2022/058	07.04.2022	Till March 2022
2	TPWODL/RA&S/2022/129	18.10.2022	Till September 2022
3	TPWODL/RA&S/2023/053	15.05.2023	Till March 2023
4	TPWODL/RA&S/2023/143	12.10.2023	Till September 2023

Para wise details of updated compliance status are as under:

8) **Para No. 6 (i)-** Security deposit from consumers amounting to Rs. 752.94 Cr. was transferred to TPWODL. As per auditor's report, amount outstanding as per consumer ledger is Rs. 760.35 Cr. and balance Rs. 7.41 Cr. is unreconciled. TPWODL was directed to reconcile the balance Rs. 7.41 Cr. through independent auditor and submit the report to the commission.

   Compliance: - TPWODL has appointed an Independent Auditor for reconciliation, as directed. The current status of the audit has been duly communicated to the Hon'ble Commission.

9) **Para No. 9 -** TPWODL to provide a quarterly account of the amount of grants spent/returned and balance with banks along with interest accrued thereon maintained against grants audited by an independent auditor.

   Compliance: - The Audit Reports and Financial details as above are being communicated to the Hon'ble Commission. Initially, the audit report for Jan-21 to Mar-22 was submitted to the Hon'ble Commission via letter No. TPWODL/RA&S/2022/104 dated 23-08-2022. However, a subsequent update conveyed through letter dated 18-10-2022 highlighted a closing balance of Rs. 226.46 Cr as of 30-09-2022 (Sep'22). Following this, the audit report for the period of Apr-22 to Sep-22 was submitted to the Hon'ble Commission via letter TPWODL/RA&S/2023/40 dated 24-04-2023. Additionally, Independent Auditor's report regarding Government Grants for Oct-22 to Mar-23 was submitted to OERC through letter no. TPWODL/RA&S/2023/061 dated 09-06-2023. The latest communication, dated 12-10-2023, informed the Hon'ble Commission about the ongoing audit progress for the period of Apr-23 – Sep-23.

10) **Para No. 14 -** Interest payable on security deposit of Rs. 27.79 Cr. was transferred to TPWODL. TPWODL shall be required to submit proof of actual payment as and when this liability is discharged.

Compliance: - TPWODL had already complied with the above direction vide Letter No. TPWODL/RA&S/2022/058 dated 07-04-2022.

11) **Para No. 15 -** Liabilities of Rs.1.60 Cr. towards electricity duty collected and not remitted as on 31.12.2020 has been transferred to TPWODL. TPWODL shall be required to submit proofs of actual payments.

Compliance: - The continuity of business is maintained through the consistent practice of depositing rollover balances in subsequent months.

12) **Para No. 17 -** Rs.5.97 Cr. transferred to TPWODL. TPWODL needs to submit proof of actual payment.

Compliance: - TPWODL vide letter dated 12-10-2023 has communicated that an amount of Rs. 5.05 Cr. was remitted to TPSODL on 17-03-2022. The balance amount is yet to be paid. In adherence to regulations, proof of this payment had been furnished to the Hon'ble Commission vide letter dated 07-04-2022.

13) **Para No. 20 (Capital Work in Progress)-** Rs.118.15 Cr. has been transferred to TPWODL. TPWODL has to provide details of CWIP created out of Govt grants and Consumer contribution. Scheme-wise register shall be submitted by 31.12.21.

Compliance: - TPWODL vide Letter No. TPWODL/RA&S/2022/058 dated 07-04-2022 furnished scheme-wise register amounting to Rs. 118.15 Cr. to the Hon'ble Commission.

14) **Para No. 23 (iii) -** Rs.141.65 Cr. towards unspent grants transferred to TPWODL. TPWODL shall provide quarterly account of balance along with interest accrued.

Compliance: - TPWODL vide letter dated 18-10-2022 provided details regarding Grants Spent/Returned and the balance with banks, including accrued interest up to 30-09-2022. Subsequently, an Audit Report covering Oct-22 to Mar-23 was submitted to the Hon'ble Commission vide Letter No. - TPWODL/RA&S/2023/061 dated 09-06-2023. The most recent communication dated 12-10-2023 updated the Hon'ble Commission about the ongoing audit progress for the period Apr-23 to Sep-23 which is currently underway.

15)**Para No. 23 (vii) -** TPWODL to submit quarterly details of the amount of liabilities which are outstanding as on 31.12.2020 and subsequently settled by TPWODL.

Compliance: - TPWODL submits that the liability is settled till Mar-23. Details is appended below:

Particulars	AS on 31.12.20 (in Rs Cr.)	Paid till Sept -21 (in Rs. Cr)	Paid in Oct-21 to March - 22 (in Rs. Cr)	Balance as on 31.03.2022	Paid in Apr-22 to Sept-22 (in Rs. Cr)	Balance as on 30.09.2022	Paid in Oct-22 to Mar-23 (in Rs. Cr)	Balance as on 31.03.2023
Para 8 Retentions from suppliers/contractors	22.52			**22.52**	**1.68**	**20.84**	**0.10**	**20.74**
Para 13 Sundry Creditors	55.74	17.24	0.59	**37.91**	**0.06**	**37.85**	**0.12**	**37.73**
Para 16 Creditors on Capital	23.73	21.96	-	**1.77**		**1.77**	**0.07**	**1.70**
Para 18 Other Current Liability (Total Rs 95.20 Cr.)	14.85	14.85	-	-		-		
	43.65	-	24.19	**19.46**	**19.46**	-		
	36.70	-	2.85	**33.85**		**33.85**		
Total	**197.19**	**54.05**	**27.63**	**115.51**	**21.20**	**94.31**	**0.29**	**94.02**

Data compilation work, pertaining to the period until Sep-2023 is under progress. The Central Finance team is collaborating with the Divisional Accounts team to facilitate this process. Concurrently, the audit is also in progress. The same has also been submitted to the Hon'ble Commission vide letter dated 12-10-2023.

16)**Para No. 27 -** TPWODL to maintain separate records for arrear collections from consumers pertaining to the period prior to 31.12 20. The amount after deducting the incentive, shall be dealt with as per para 43(h) of the vesting order. The amount shall be paid to GRIDCO on monthly basis towards settlement of outstanding BSP dues. Suitable MIS report shall also be submitted by TPWODL to GRIDCO showing detailed month wise revenue collections and past arrear collections. The same shall be audited by an independent auditor on a half yearly basis and report shall be submitted to the Commission and GRIDCO within 90 days from the end of the half year.

Compliance: - TPWODL vide letters dated 18-10-2022 and 15-12-2022 have submitted the Auditor's Report pertaining to the period from Jan-21 to Mar-22 and from Apr-22 to Sep-22 respectively. However, for the balance half year i.e. from Oct-22 to Mar-23, provisional data was submitted on 26-04-2023. TPWODL vide letters dated 12-10-2023 have submitted the MIS of Past Arrear Collection and remittance pattern to GRIDCO for H1, FY 23-24 (up to the month of Aug-23) and also informed about the progress of Audit. Further, the auditor's report on Past Arrear Collection and remittance for the period of Oct-22 to Mar-23(FY 22-23) has been submitted to the Hon'ble Commission vide Letter No: TPWODL/RA&S/2023/177 dated 03-11-2023.

17)**Para No. 28 -** TPWODL shall obtain Commission's approval for liabilities pertaining to period before 31.12.20 as and when settled. TPWODL shall obtain post facto approval if not obtained.

Compliance: - TPWODL is seeking approval on case to case basis for payment of past liabilities in line with direction under Vesting Order & Segregation Order.

6. Allocation of Wheeling and Retail supply cost

As per the Tariff Regulation, 2022 of Hon'ble Commission, vide following clause has directed for allocation of Wheeling and Retail Supply Cost:

"2.5.1The Distribution Licensee shall segregate the accounts of the Licensed business into Wheeling Business and Retail Supply Business within one year of notification of these Regulations as per the guidelines to be issued by the Commission.

2.5.2. The Wheeling Charges of the Distribution Licensee shall be determined by the Commission on the basis of segregated accounts of Wheeling Business:"

Till the time the Distribution Licensee submits audited and certified separate accounts for Wheeling Business and Retail Supply Business, a Allocation Matrix as provided shall be applicable, accordingly the licensee has bifurcated the wheeling cost and retail supply cost as per table appended below considering proposed parameters.

Cost/Income Component	ARR for FY 2024-25	Assumption Ratio for consideration in Wheeling Business	Assumption Ratio for consideration in Retail Supply Business	Wheeling cost for FY 2024-25	Retail supply Cost for FY 24-25
Cost of Power	449222.89	0%	100%	23166.72	426056.17
Transmission Charges	27640.61	0%	100%	1801.86	25838.75
SLDC Charges	205.66	0%	100%	205.66	0.00
Total power purchase cost *	**477069.16**			**25174.23**	**451894.92**
O&M					
Employee Cost	60649.92	60%	40%	36389.95	24259.97
Repair & Maintenance Cost	33686.40	90%	10%	30317.76	3368.64
Administrative & General Expenses	24586.53	50%	50%	12293.27	12293.27
Bad & Doubtful Debt including Rebate	5751.16	0%	100%	0.00	5751.16
Depreciation	12598.40	90%	10%	11338.56	1259.84
Interest on Loans					
For Term Loan CAPEX	3156.40	90%	10%	2840.76	315.64
for Working capital	6712.05	10%	90%	671.21	6040.85
Interest on Security Deposits	8589.27	0%	100%	0.00	8589.27
Return on Equity	13542.97	90%	10%	12188.67	1354.30
Tax on ROE	4555.35	90%	10%	4099.81	455.53
Carrying cost on Regulatory Assets/Liabilities	58.85	10%	90%	5.88	52.96
Special Appropriation					
Amortization of Regulator Assets	0.00	25%	75%	0.00	0.00
True Up of Current year	-37111.91	25%	75%	-9277.98	-27833.93
Other, if any-Contigency Reserve	0.00	100%	0%	0.00	0.00
Grand Total	**613844.54**			**126042.12**	**487802.42**
Miscellaneous Receipt					
Non-Tariff Income	38602.13	10%	90%	3860.21	34741.92

* Allocation of power purchase cost towards wheeling has been made considering 8% Loss on input after effecting EHT sale.

7. Reconsideration of Truing up of FY 20-21 (3 months) & FY 21-22 and truing up for FY 22-23

As per the existing regulation the licensee is mandated to file it's truing up petition before 30th Nov of each year for the previous year. Furthermore, the Hon'ble Commission in Order dated 23.03.2023 had considered the truing-up of FY 2020-21 (3 months) & FY 2021-22. Also, the Hon'ble Commission had taken a view to finalize the truing-up for FY 2020-21 along with truing-up for FY 2021-22 when the full year audited accounts are available. However, there are certain errors in the said truing up, which needs to be revisited. Accordingly, revised truing up for FY 2020-21 (3 months) and truing up for FY 2021-22 has been filed with Hon'ble Commission separately along with Truing up for FY 2022-23. An abstract is depicted below for kind reference:

Revised FY 2020-21 (3 months):

Statement of Truing up calculation for FY 2020-21 (Jan'21 to Mar'21)				**Rs. In Cr.**
Particulars	**Approved in the ARR FY 21**	**Audited (3 months)**	**Allowed in true up**	**Request to consider now FY 21 (3 months)**
Expenditure				
Cost of Power Purchase	2633.22	689.8	660.68	665.15*
Employee costs	361.02	101.7	101.7	116.38*
R&M Expenses	92.24	5.75	5.75	5.75
A&G Expenses	52.8	36.76	13.2	22.07*
Provision for Bad & Doubtful Debts	22.95	8.53	5.74	8.53*
Depreciation	61.4	16.4	15.35	16.40*
Interest on Working capital	0	2.95	2.95	2.95
Interest on Consumer Security Deposit	38.62	8	8	8
Interest on long term loan	14.58		0	0
Sub-Total	**3276.83**	**869.89**	**813.36**	**845.23**
Less: Employee cost capitalized				
(A) Total expenses	**3276.83**	**869.89**	**813.36**	**845.23**
Income Tax				
(B) Return on Equity	**7.78**	**0**	**12**	**12**
TOTAL (A+B)	**3284.61**	**869.89**	**825.36**	**857.23**
Less: Miscellaneous Receipt	191.39	44.93	44.93	44.93
Less: Receipt on a/c of CSS		46.57	46.57	46.57
Total Revenue Requirement (C)	**3093.22**	**778.39**	**733.86**	**765.72**
Revenue from Sale of Power (D)	**3128.91**	**847.62**	**847.62**	**847.62**
GAP (-)/ Surplus (+) (D-C)	**35.69**	**69.23**	**113.76**	**81.90**

Revised Truing up FY 2021-22:

Statement of Truing up calculation for FY 2021-22				**Rs. In Cr.**
Particulars	**Approved in the ARR FY 22 & ABP**	**Audited FY 2021-22**	**Allowed in true up**	**Request for consideration FY 2021-22**
Expenditure				
Cost of Power Purchase	3140.48	3338.17	3310.91	3340.43*
Employee costs	409.49	456.35	412.35	473.45*
R&M Expenses	160	137.06	137.05	137.06*
A&G Expenses	103.17	146.23	103.17	113.27*
Provision for Bad & Doubtful Debts	27.42	45.03	45.03	45.03
Depreciation	36.34	81.12	24.45	24.45
Interest on Working capital	34.37	9.98	9.98	9.98
Interest on Consumer Security Deposit		32.95	32.95	32.95
Interest on long term loan				
Sub-Total	**3911.27**	**4246.89**	**4075.90**	**4176.61**
Less: Employee cost capitalized		5.64	5.64	5.64*
(A) Total expenses	**3911.27**	**4241.25**	**4081.54**	**4170.97**
Arrear collection Incentive				
Return on Equity	48	63.74	52.79	52.79
Income Tax		21.45	0	21.79*
(B) Sub-Total	**48**	**85.19**	**52.79**	**74.58**
TOTAL (A+B)	**3959.27**	**4326.44**	**4134.33**	**4245.55**
Less: Miscellaneous Receipt	237.45	234.36	142.67	142.67
Total Revenue Requirement ©	**3721.82**	**4092.08**	**3991.66**	**4102.88**
Revenue from Sale of Power (D)	**3705.75**	**4691.86**	**4691.86**	**4691.86**
GAP (-)/ Surplus (+) (D-C)	**-16.07**	**599.78**	**700.20**	**588.98**

Truing up FY 2022-23:

Statement of Truing up calculation for FY 22-23			**Rs. In Cr.**
Expenditure	**OERC Approved FY 22-23**	**TPWODL FY 22-23 (Audited)**	**Considered for True-up FY 22-23**
Total Power Purchase, Transmission & SLDC Cost(A)	**3610.07**	**5094.79**	**5169.93**
Employee Cost	474.83	467.40	474.40
Repair & Maintenance	156.03	237.56	237.56
Administrative and General Expenses	110.39	153.46	146.45
Provision for Bad & Doubtful Debts	27.87	129.41	61.81
Depreciation (net of CC & Grants Assets)	46.52	44.27	44.27
Interest Chargeable to Revenue (Interest on S.D)	37.50	63.94	63.94
Interest on Working Capital & Finance costs	7.00	21.15	67.55
Total Operation & Maintenance and Other Cost	**860.14**	**1117.19**	**1095.98**
Less: Employee Cost Capitalised	21.18	15.23	15.23

Statement of Truing up calculation for FY 22-23			**Rs. In Cr.**
Expenditure	**OERC Approved FY 22-23**	**TPWODL FY 22-23 (Audited)**	**Considered for True-up FY 22-23**
Less: Interest Capitalised		3.64	3.64
Add: Return on Equity	48.00	67.21	67.21
Add: Tax Income		31.94	22.61
Total Distribution Cost	**886.96**	**1197.47**	**1166.93**
Less: Miscellaneous Receipt	267.69	233.99	218.33
Less: Cross Subsidy/ Open Access Charges		540.07	540.07
Net Distribution Cost (B)	**619.27**	**423.40**	**408.52**
Less: Provisional Surplus considered	**150.00**		
Total Special Appropriation (C)			
Total Revenue Requirement (A+B+C)	**4079.34**	**5518.20**	**5578.45**
Total Revenue (Full year) on accrual basis	**4119.48**	**6180.86**	**6180.86**
GAP at existing (+/-) on accrual basis	**40.14**	**662.66**	**602.41**

8. Tariff Proposals and Rationalization Measures

The Hon'ble Commission has taken immense steps in introducing a number of new schemes through which all the consumers across all the licensees could be able to avail reliable power supply at affordable rate. Specifically, for industries a competitive tariff in compared to industrial tariff of adjacent States. During FY 22-23, the use of power by industries having CGP with CD up to 20 MW to the tune of double the CD without levy of overdrawal penalty was very much effective. However, the precondition placed for FY 23-24 was again became ineffective due to its procedural formalities. The licensee again proposes the continuity of this scheme along with other schemes in the coming years with certain modifications wherever required. The required modification has been suggested in the foregoing paragraphs.

During the ensuing year the licensee is proposing certain tariff rationalization measures in the following paragraph and also request Hon'ble Commission for continuation of existing benefits as the consumer is otherwise eligible.

The Licensee requests Hon'ble Commission for Continuation:

1. Digital rebate to 4% for LT Domestic, LT GP single phase & Single-phase irrigation consumers
2. Discount of 10 paise to Domestic Rural Consumers if consumed on actual meter reading
3. Levy of CSS on RE power
4. Special tariff to steel industries at 33 kV level without having CGP
5. Continuity of Special tariff for industries having CGP with CD up to 20 MW
   However, in the RST order dt.23.03.2023 Hon'ble Commission have made certain departure and directed for prior permission from GRIDCO. As the scheme is purely within the approved SMD of DISCOM, prior permission to on monthly basis is not gaining acceptability to the consumers. So, they are finding difficulty in planning their business as well as the operation of their own power plant. Therefore, for sustainability of the scheme, it is once again submitted that the scheme may kindly be approved for ensuing year without prior permission from GRIDCO. In addition to this an industry availing this benefit shall not be permitted to avail the benefit of another scheme.
6. Special tariff for Existing industries having CGP with CD >20 MW with minimum offtake 80% of existing CD with TPA among GRIDCO, DISCOM & Consumer.
7. . Continuation Green Tariff Premium (GTP) mechanism.

Tariff Rationalization Measures (New Proposals)

8.1 Additional Rebate of Rs.10/ - p.m. if opted E-Bill:

Now, with digital platform, all are familiar with Electronic Bill (E-Bill). Almost all the bankers are encouraging/adopting E-Statement for the account holder. Credit Card bills are being served through E mode, which is acceptable to all the users. Almost in all segments E-Bill is generally acceptable. But, as per Regulation serving of electricity bill through E-mode has not been emphasized. No doubt high value consumers are accepting E-Bill and desiring to continue regularly, to save their bill processing time & avail prompt payment rebate.

As per present Distribution (Conditions of Supply) Code, 2109 vide regulation 147(i) licensees are directed serve the bill in the following manner;

> *"(i) It would be the duty of the engineer or his authorized agent to ensure that the bills are dispatched within ten days from the end of billing cycle and records of such*

dispatch are duly maintained. The licensee/supplier shall send the bills to the consumers either by post or by courier or through the messenger well before the due date to avoid any inconvenience to the consumer not covered under spot billing. The licensee/supplier may ***send the information on billed amount and due date of payment to the consumers through registered E-mail ID/Mobile numbers/smart meters****.* ***The mobile number of each consumer shall be collected /recorded for sending billing SMS.” (Emphasis added)***

Even though, information to the extent of billed amount and due date of payment to the consumer has been mandated to send through registered E-mail Id/Mobile numbers/Smart meters etc but serving of bill to the consumer physically through courier/special messenger/spot billing has been strictly mandated. Further, the Hon’ble Commission has also directed to connect with the consumer through registered post/courier service/registered E-mail/personal service with proper acknowledgement in case of load reduction (Regulation 123) and Load Enhancement (Regulation 130). Therefore, considering the present lifestyle and technology advancement, the most powerful communication are email and mobile phone.

At present, all the licensees are spending a substantial amount on Meter Reading and Bill Distribution. In Dec-2020, the Ministry of Power (MoP) has also brought guidelines for replacement static/old meters with Smart meters in phased manner. Accordingly, across the country demand for Smart meters has been increased substantially and the licensee has also started installation of Smart meters. We have already replaced around 135000 old meters with smart meters and all the new 3-phase/1-phase connections are being provided with Smart Meters. So, consumers with smart meters can be served with E-bill without any additional cost. Going forward, all the consumers will be covered under Smart Meter fold. So, to promote installation of smart meters and reduction in Meter Reading and Bill Distribution Expenses, the licensee proposes **Rs.10/ p.m**. additional Rebate over and above all other rebate as the consumer is otherwise eligible may please be approved where a consumer desires/opt for E-bill instead of physical bill. If this is permitted, our MRBD cost will be zero where consumer is having smart meter.

Further, if provision of E-mail ID will be mandated the consumer can also get many information/communication from the licensee and the benefits are as under:

- Consumer will be able to get the estimate and all timely updates in her/his mail.

- No involvement of hard copy, no use of paper, system will become more Eco friendly, less carbon footprint.
- Fear of loss of physical copy shall be ruled out.
- Consumer can fetch the e-Bill details via his/her mail.
- No need of physical movement for customer which will enhance customer satisfaction.

8.2 Processing fee for each service as per Regulation

Presently, the licensees are directed to serve the consumer for their different requirement apart from Billing and collection activities. Consumers also needs, Load Change (Reduction/Enhancement), attribute changes (like Change of name, Category Change, name correction, address correction /Change etc.)

As per existing Regulation, for new connection the processing fee has been defined as Rs.50/-per application, however, there is no such charges is payable for the other services like Change of name, Category Change, name correction, address correction /Change etc. But the licensee is spending a considerable amount for such services. Therefore, the DISCOM proposes, the following charges may kindly be approved for providing better & timely services to the consumer for each of the services requested for:

Sl. No.	Purpose of Application	Application Processing charges (APC)
1	Change of Category	Rs. 100/-
2	New Connection / Load Change	Rs. 100/-
3	Change/correction of Name or address, Ownership change/modification	Rs. 100/-

It will help to maintain uniformity in processing all types of New Connection and Attribute change applications.

8.3 Uniform Tariff for a specific category of Consumer as per load instead of Voltage of Supply:

Presently few of the consumer are covered under LT & HT for Tariff purposes considering their Voltage of Supply, which creates many confusions and disparity. They are as follows:

Category of Consumer	Voltage of Supply (LT)	Voltage of Supply (HT)
General Purpose >= 110 kVA	Energy Charges Rs.6.20 p/u, Demand Charges Rs.200/kW	EC of Rs.5.85 p/u (up to 60% LF and Rs.4.85 p/u for >60% LF

	& Customer Service Charges Rs.30/month	consumption), DC Rs.250/kVA & CS Charges Rs.250/month
General Purpose>70 kVA <= 110 kVA	No such Tariff Category	-do-
Irrigation Pumping and Agriculture	Rs.1.50 p/u for EC and Rs.20 p/m MMFC	Rs.1.40 p/u for EC, Demand Charges Rs.250/ kVA & CS Rs.30/-pm
Allied Agricultural Activities	Rs.1.60 p/u for EC and Rs.20 p/m MMFC	Rs.1.50 p/u for EC, Demand Charges Rs.250/ kVA & CS Rs.30/-pm
Allied Agro-Industrial Activities	Rs.3.10 p/u for EC and Rs.80 p/m MMFC	Rs.3.00 p/u for EC, Demand Charges Rs.250/kVA & CS Rs.50/-pm
PWWS<110 kVA	Rs.6.20 p/u EC and MMFC Rs.50/kW	-
PWWS>110 kVA	Rs.6.20 p/u EC, Demand charges of Rs.200/kW and CS Rs.30/pm	EC of Rs.5.85 p/u (upto 60% LF and Rs.4.85 p/u for >60% LF consumption), DC Rs.250/kVA & CS Charges Rs.250/month
Medium Industry >=22 kVA <110 kVA	Rs.6.20 p/u EC and MMFC Rs.100/kW	-
Medium Industry*	-	EC of Rs.5.85 p/u (up to 60% LF and Rs.4.85 p/u for >60% LF consumption), DC Rs.150/kVA & CS Charges Rs.250/month

**No such limitation of load has been defined under HT.*

Even though as per existing RST, irrespective of voltage of Supply, considering type of metering (LT or HT) tariff is applicable, but in practical implementation and acceptability to consumers it is becoming more cumbersome and confusing. Therefore, to avoid all sort of confusion the DISCOM proposes that basis upon the consumers contract demand/connected load and metering type (LT or HT) tariff may be fixed instead of voltage of supply. The benefits to both licensee and consumer would be as follows:

- Transformer loss can be recovered for all consumers if the meter side is HT and HT tariff for load >=70 kVA.
- LT consumers (Load <70 kVA) to be billed as per slab rate and transformer Loss will not be levied.
- There may be uniformity in tariff category and Metering side.

8.4 Charges for Temporary Supply:

As per the Hon'ble Commission's RST order vide para 238, charges for temporary supply have been allowed with payment of 10% higher on energy charges. For this purpose, the rate provided as per relevant consumer category shall be applicable.

> *"Para 238 The tariff for the period of temporary connection shall be at the rate applicable to the relevant consumer category with the exception that Energy Charges*

> *shall be 10% higher (in case of temporary connection)* ***compared to the regular connection****. Connections, temporary in nature, shall be provided as far as possible with pre-paid meters to avoid accumulation of arrears in the event of dismantling of the temporary connection etc."* ***(Emphasis added)***

As per Distribution Conditions of Supply Code 2019, Temporary supply has been defined as under

> ***"138 (p) Temporary supply***
> *This category relates to supply of power to meet temporary needs on special occasions including marriage or other ceremonial functions, fairs, festivals, religious functions or seasonal business or for construction of residential houses, complexes, commercial complexes, industrial premises provided that such power supply does not exceed a period of six months*. "

With the above Regulatory provisions, a person, or industries desires to avail construction supply, applicability of charges as respective category is becoming a challenge. Because unless construction completed, they may not be covered under appropriate category as per tariff norms. So, the licensee is of the view a more clarity may be provided for easy of doing business. Nonetheless for construction purposes, GP tariff may be made applicable for all types of construction irrespective of future tariff category upon completion of construction activity. During construction period electricity is being used for general purpose only, upon completion they may be covered on appropriate category as per the terms of power supply agreement. This may please be approved.

8.5 Creation of Category for Mega lift points under EHT and applicability of Demand Charges.

The licensee is having a consumer under mega lift with CD of 13500 kVA and availing power supply with 132kV level. As there is no such tariff category under EHT for such supply, TPWODL is billing it under HT irrigation as per applicable tariff. The Hon'ble Commission in the RST order dt.23.03.2023 has notified tariff for Mega lift points in the following manner:

> *"(xxxii)The Mega Lift consumers (who are using electricity for irrigation purpose and not covered under irrigation pumping and agriculture category of the Regulation)* ***connected either to HT or EHT system shall be treated as GP consumers and shall***

not pay any demand charges and shall get an additional rebate of Rs.2 per unit (kVAh) *on the respective energy charges*." **(Emphasis Added)**

It is respectfully submitted that extending rebate of Rs.2 per unit on Energy charges may be permitted but waiver of Demand charges is a discrimination with other consumers and the licensee is heavily affected. So, it requested to kindly create separate category under EHT with demand charges of Rs.250 per kVA and energy charges under graded slab method for Mega lift points connected at HT & EHT level.

8.6 Special tariff for industries those who have closed their units if reopen/starts

TPWODL has made a wide study in its area of operation and found that there are no of industries who have closed their units since long. This may be due to different reason, but resources are getting wasted because of non-operational. To start a business creating all the infrastructure is always a challenge however, having a set up an industry can start with minimum expenditure. Specifically, with the present market condition which is moving much faster pace. If a suitable tariff structure for the closed units can be introduced, we hope definitely some more industry can restart their unit. Further, when industries will run, it will create employment opportunity, GST & Income Tax also contributes towards national GDP. Further operationalization of industries will help in growth of industrialization, create employment opportunity, improvement in national GDP etc.

a. The proposal is for industries those who have closed their units in complete shape prior to take over.
b. Industries those who have arrear outstanding even after adjustment of SD has to clear it's dues before availing the benefit.
c. The industry has to start with the load when it was closed. No load reduction is permissible before or after availing this benefit during FY 24-25.
d. The incentive may be given @ 20% on entire units consumed if achieves 60% L.F. in a month.
e. Closed Industry may be permitted at 11kV or 33kV level with minimum CD of 500 kW.
f. As this is a special scheme for revival of the closed units it will be for the year 2024-25 only.
g. On account of closure of units no one is benefited including Government of Odisha who will get electricity duty @8% on energy charges. So, this will offset the incentive so offered to a large extent.

h. This incentive will be over and above all other existing incentives in the tariff
i. Industries opting this benefit shall not be eligible for open access.
j. Double incentive is not to be permitted.

8.7 Special tariff for existing industries who have no CGP for drawl of additional power beyond CD of 10 MVA

Upon announcement of above scheme few of the other industries those who have no CGP has started approaching for similar type of scheme for them so that they can utilize their existing installed capacity in full, beyond CD or may add capacity in the existing premises beyond CD if permitted. In line with special tariff for industry having CGP, a special tariff for non CGP industries connected in 33 KV level or above may kindly be considered. The scheme may be as follows:

a) The agreement shall be between the industry & concerned DISCOM.
b) Under 33 KV level the permissible limit of drawl is 15000 KVA, but licensee has the discretion to allow beyond the limit of 15 MVA on special ground considering the adequacy of system availability. If system does not permit then the opting industry has to augment the system of supply to higher level to avail this benefit.
c) Industry interested for this scheme has to ensure minimum offtake of 85% L.F. of existing CD
d) Load reduction shall not be allowed during the financial year or those who have reduced their load has to restore before availing the scheme.
e) The power so consumed under this agreement may be treated as surplus power of GRIDCO and this quantum shall be over and above the approved quantum in ARR including SMD.
f) Interested industry has to pay a flat rate for the additional energy so consumed beyond 85% of CD.
g) Consumption upto 85% LF shall be billed as per existing RST
h) No demand charges for the additional quantum beyond existing CD.
i) Open access shall not be permitted during this special arrangement.
j) As this is a special agreement adequate Payment security mechanism shall be in place before power transaction as well as there will not be any rebate on additional power. However, DPS shall be applicable if payment is not made within due date.

k) Industry availing this benefit shall not be permitted to avail benefit of another scheme.

8.8 Special tariff for Industries for temporary business requirement

As per existing regulation temporary supply is permitted to meet temporary needs on special occasions including marriage or other ceremonial functions, fairs, festivals, religious functions or seasonal business or for construction of residential houses, complexes, commercial complexes, industrial premises provided that such power supply does not exceed a period of six months. For these purposes the **Energy Charges shall be 10% higher as compared to the regular connection**.

Under TPWODL area there are around 24 industries having their own CGP. Some of them has single unit of generation and some are having multiple units with different capacity. To maintain the generating unit's annual maintenance is inevitable. Similarly, some of the other industries need power intermittently to meet seasonal requirements. For such temporary outages of their CGP and short-term business need they approaches DISCOM for power for couple of months, sometimes even for less than 15 days. They are also not willing to increase their load for such short-term need as reduction of load has certain restriction.

In view of the above TPWODL submits before Hon'ble Commission to approve/permit such temporary additional load beyond CD for short period of maximum 3 months. In that event the industry has to **bear 10% higher charges on both normal Demand and energy component**. Such additional consumption will contribute towards revenue enhancement and will help to protect risk of tariff enhancement. The above temporary arrangement shall be accommodated by the licensee well within its approved/permitted SMD, without additional burden to GRIDCO.

It is relevant to mention that there are around 74 nos. of CGP at present under all 4 DISCOMs (excluding NALCO and IMFA) and their installed capacity is (5808 MW+2609 MW+166.38 MW+934.5 MW) 9517.88 MW. Therefore, requirement of power during annual maintenance of their units may be needed from DISCOM. If some type of arrangement in tariff is created it will be a win-win situation for all the stake holders. The licensee is submitting herewith before Hon'ble Commission to consider the above proposal in the ensuing year ARR.

8.9 Minimum offtake for the industries having CGP.

Presently the BST of all the DISCOMs is with composite of Energy and Demand charges. Considering the approved SMD composite BST is determined by Hon'ble Commission. At the same time HT & EHT consumers have to pay the demand charges @ Rs.250 per kVA per month on Demand Recorded or 80% of CD whichever is higher. The existing Demand charges is continuing since long. In the neighboring states the Demand charges is on the installed capacity @ Rs.375 per kVA per month however, here in Odisha irrespective of installed capacity, consumer has the choice to keep the contract demand. With increased consumer mix under LT segment as well as increase of O&M cost meeting fixed cost like Staff cost R&M by Distribution company becoming sturdier.

The major impact is due to the CGP industries who are keeping their CD, but not using the DISCOM energy. Wherever, they use only on occasional requirement that to during peak period. As result, GRIDCO is facing difficulty in arranging power for them as they are drawing without prior intimation or scheduling in the imploration of fixed demand charges. With Demand charges of Rs.250 per kVA and occasional drawing has major impact on DISCOM. Therefore, the DISCOM proposes that for Industry having CGP has to off take minimum 25% of the requirement commensurate with their CD or Demand charges has to be on installed capacity instead of CD.

8.10 Revision of Reconnection Charges with penalty clause

It is submitted that the reconnection charges w.e.f. 01.04.2023 is continuing since last 11 years even though BST and RST of DISCOMs have increased no of times.

Category of Consumers & Applicable Rates

Particulars	Prior to 1st April 2012	Continuing since 1st April 2012	Proposed Reconnection charges
LT Single Phase Domestic Consumer	Rs.75/-	Rs.150/-	Rs.300/-
LT Single Phase other consumer	Rs.200/-	Rs.400/-	Rs.800/-
LT 3 Phase consumers	Rs.300/-	Rs.600/-	Rs.1200/-
All HT & EHT consumers	Rs.1500/-	Rs.3000/-	Rs.6000/-

Now, the biggest challenge in the field even after disconnection, consumers are not willing to reconnect power supply formally, but found to be reconnected again through their own means and ways. This is not only affecting business of the licensee, at the same time risk of fatal accident cannot be ruled out. It is not possible to monitor post disconnection by 24 X 7 with the available resources as well as it is not cost effective. Therefore, it is the humble submission of the licensee to put a separate stringent punishment, a separate penalty clause may be approved to create fear among such segment of consumers. **In the event of consumer found reconnected without paying formal reconnection charges shall be imposed with 10 times of the reconnection charges, apart from other action as per law**.

In addition to above, upon reconnection if the consumer fails to clear its dues regularly and the licensee is disconnecting the consumers, in such case the consumer has to pay 5 times of the reconnection charges for each subsequent reconnection so made.

9. Other Proposals

9.1 Billing with Defective Meter

As per existing regulation the licensee is permitted to raise provisional bill for maximum up to three months and during this time the defective meter has to be replaced with new meter. Thereafter, the provisional bill so raised shall be revised considering actual meter reading for consecutive six billing cycle. The extant regulation of OERC Distribution (Conditions of Supply) Code, 2019 is appended below:

> *"155. For the period the meter remained defective or was lost, the billing shall be done on the basis of average meter reading of the past three billing cycles immediately preceding the meter being found/reported defective. These provisional charges shall be leviable for a maximum period of three months during which time the licensee/supplier/consumer is expected to have replaced the defective meter. The provisional bill shall be revised as per the average of six consecutive billing after a new meter is installed. In no case the previous bill can be revised for more than two (2) years prior to the installation of new meter."*

With the above mechanism the licensee is facing the following difficulties in implementing the provision

a. Consumers are not paying even the actual bill after replacement of defective meter unless the bill is revised. The licensee is helpless even collecting the actual bill from the consumer & has to wait for six consecutive billing cycle.
b. In many cases consumers are desiring to revise the bill considering past actual consumption in corresponding period, but DISCOM can not violate the provision of law.

c. Some are insisting for bill revision considering actual metering after one month's consumption.
d. Most of the consumers are trying to control the consumption and tempted to use through other means with an intention to reduce the billing even though they have actually used during meter defective period.

With the above ground reality, the DISCOM is not able to improve the collection efficiency and has to wait for six months till bill is rectified. Even after lapse of six-month when the bill is revised with upward assessment the consumer is not willing to pay such huge amount.

The DISCOM understands the provision of prevailing regulation, however, Hon'ble Commission has the power to issue practice direction for proper billing and collection thereof till the supply code, 2019 is being amended.

Therefore, the Licensee humbly submits that, a practice direction may kindly be given in the RST order FY 24-25 for revision of the provisional bill in case of defective meter, considering the past corresponding period's actual consumption. That means if meter found defective in Summer, bill shall be revised considering actual consumption of summer only and if it is in winter past winter period actual meter reading may be taken into consideration. However, basing upon actual consumption during the succeeding six-month period, necessary sundry debit shall be made if the actual consumption in succeeding month is less than or more than the past corresponding period's actual consumption.

Further, at present Hon'ble Commission has allowed bill revision of past period till 15th July-23 (as per OTS order), which may kindly be further extended for one more year.

9.2 Combined Application form replacing Form-I & Form-II

Presently, as per Regulation 3, a Domestic & GP consumer is opting Form-I for New Service Connection / Load enhancement/ Load reduction/ Reconnection /Change of Name/ Shifting/ Temporary Supply/ Conversion of Service/ Change of consumer category and Form-II is applicable to other category of consumers to the extent of New Connection/Load Reduction/Load Enhancement/Change of Name.

With this, consumers are confused about the Application form which one they must choose (Form I or Form II). Licensee is also unable to capture the detailed information about the consumer. Hence, TPWODL proposes to introduce a single application form which is beneficial for both consumers and licensee. Even though it requires amendment of Regulation, Hon'ble Commission with discretionary power may direct/allow through practice direction to adopt a common Application Form till Regulation is amended.

9.3 Creation of Energy Police station

It is to submit that in past State Govt had taken anti-theft initiatives and also created no of energy police station across all the DSICOMs. Home Department Govt of Orissa vide Notification No 47514 dated 23.10.2008, has declared creation of Energy police station in 29 locations across Odisha. As per our understanding there are 10 no of EPS were created under TPWODL Zone namely at Sambalpur (Burla), Deogarh, Sundargarh, Sonepur, Kalahandi, Bolangir, Nuapada, Rourkela, Bargarh and Jharsuguda.

Effectiveness of EPS in the past was not encouraging at that point of time due to no of factors. However, with present management and changed scenario the outcome would be definitely positive, if the same is permitted to re-establish. Therefore, the licensee humbly requests before Hon'ble Commission to accord approval of necessary additional A&G cost and may direct Govt of Odisha for creation of EPS across all the DISCOMs. Now TPWODL has plans for setting up of at least 2 EPS, in two circles (Bargarh & Bolangir) with following staffing position:

<table>
<tr><th colspan="4">TPWODL Area</th><th colspan="6">Proposed Required Manpower</th></tr>
<tr><th>Circle</th><th>TPWODL Divisions</th><th>Revenue Districts of Odisha</th><th>Area Covered (SQ KM)</th><th>Inspector</th><th>Sub Inspector</th><th>Constable (Male)</th><th>Constable (Female)</th><th>Home Guard (Male)</th><th>Home Guard (Female)</th></tr>
<tr><td rowspan="2">SEEC BARGARH</td><td>BED BARGARH</td><td rowspan="2">Bargarh</td><td rowspan="2">5837</td><td rowspan="2">1</td><td rowspan="2">2</td><td rowspan="2">4</td><td rowspan="2">2</td><td rowspan="2">4</td><td rowspan="2">2</td></tr>
<tr><td>BWED BARGARH</td></tr>
<tr><td rowspan="3">SEEC BALANGIR</td><td>BED BALANGIR</td><td rowspan="2">Balangir</td><td rowspan="2">6575</td><td rowspan="3">1</td><td rowspan="2">2</td><td rowspan="2">4</td><td rowspan="2">2</td><td rowspan="2">4</td><td rowspan="2">2</td></tr>
<tr><td>TED TITLAGARH</td></tr>
<tr><td>SED SONEPUR</td><td>Subarnapur</td><td>2284</td><td>1</td><td>2</td><td>1</td><td>2</td><td>1</td></tr>
<tr><td colspan="3">Total</td><td>14696</td><td>2</td><td>5</td><td>10</td><td>5</td><td>10</td><td>5</td></tr>
</table>

Total staff 38 nos. including 1 SP.

Hon'ble CM of Odisha also has the vision on 5T across the State where in Teamwork, Technology, Transparency, Transformation and Time limit is the five factors on which performance of government officials and projects are be judged. It is the believe of the licensee, if the EPS are re-established it will contribute additionally for the above vision.

9.4 Assessment in case of Theft of energy

Even though Hon'ble Commission has provided separate guideline for assessment of unauthorized use in the regulation, however as per field condition while doing the assessment it is not practically feasible/ possible to adhere the provision. So, to lucidity the process it is the humble submission of the license, if a consumer found using electricity unauthorizedly, in such case the assessment must be made with LDF basis. In case of Domestic LF of 30%, for GP may be kept as 60% and in case of continuous process industries, assessment may be done with 100% LF. However, while doing the assessment, due procedure as per Electricity Act and Regulation shall be strictly observed.

9.5 Meter Cost to be included in CAPEX instead of Meter Rent

The Hon'ble Commission has notified the OERC Distribution (Conditions of Supply) Code, 2019 in August 2019. Under regulation 97 (iv) (3), the Licensee/supplier is permitted to move on gradually towards installation/replacement of prepaid/smart/pre-paid smart meters preferably within three years. Ministry of Power, Govt. of India have issued timelines for replacement of existing meters with smart meters for all consumers as per above mentioned notification dated 17th Aug-21.

It is pertinent to mention here that, TPWODL had submitted its CAPEX plan before Hon'ble Commission for FY 21-22 & FY 22-23, where in provision for installation of smart meters was made. However, envisaging impact of CAPEX on tariff, the Hon'ble Commission has taken decision in not allowing under the head CAPEX. The Hon'ble Commission permitted the recovery of Smart meter cost through monthly meter rent.

At present, in terms of the extant Regulations, TPWODL recovers an amount of Rs. 1500/- (Meter Cost - Rs. 1271 + Rs. 229 GST) under Mo Bidyut towards installation of Single-Phase meter while providing new connection.

Further, Regulation113 (v) of OERC Distributions (Conditions of Supply) Code, 2019, provides as follows:

> "*In case the licensee/supplier replaces the meter due to technological up-gradation, the cost of the old correct meter already recovered through meter rent shall be deducted from the cost of new meter and the balanced amount may be recovered through meter rent on pro-rata basis* "

Accordingly, the licensee can recover only the differential cost through meter rent on prorate basis on replacement of existing Static Meter with Smart meter. In view of the above, TPWODL have started installation of Smart Meter phase wise, beginning with 3 Ph category from July, 2022. All the new connection applications under 3 Ph category are being provided with Smart Meter only and it has been planned to start installation of Single-Phase Smart Meter from November, 2022 onwards.

Furthermore, due to technological obsolescence, the old meters are required to be replaced with smart meters. While doing so, the consumers are reluctant to allow the replacement because they have paid the meter rent fully or partially and in some cases they have purchased the meters. In such scenarios, recovery of meter rent through installation of smart meters is becoming more challenging now-a-days.

It is also submitted that, the entire new connection as well as replacement of defective meter may be permitted through Smart Meters only. The Hon'ble Commission is, therefore, requested to allow the replacement of smart meters under CAPEX instead of meter rent.

9.6 Levy of DPS on Electricity Bills

The Hon'ble Commission had discontinued the practice of levy of DPS on the Electricity Bills in the Tariff Order for FY 2023-24. The Extracts of the Tariff Order is as follows:

> *"87. The issue of levy of DPS to above categories of consumers was raised by DISCOMs during hearing. The Commission thoroughly scrutinized the issue. It is found that levy of DPS is acting as a hurdle for small consumers in resolving their disputed bills. The revenue impact of DPS for these small consumers is also not substantial. Therefore, in order to resolve bill disputes quickly, the Commission decides to abolish DPS for LT Domestic, LT General Purpose and HT Bulk Supply Domestic Consumers w.e.f. 01.04.2023."*

However, rescinding the levy of DPS has resulted in willful delay in payment as there is no deterrent now available. The DPS was acting as the required deterrent and the consumers were paying in time. In this regard, it is assured that DPS would be applicable only on the undisputed portion. Hence when the Bill gets revised due to Disputes, the DPS would be once again computed on the Un Disputed amount. Further we also note that the consumers at times are required to pay DPS as the bill delivery is delayed. Such situation arises as the Due Date is very short of 7 days. Hence in order to address this grievance of the consumer, it may be appropriate to increase the Due Date of such consumers to 30 days. In this regard, the stand of the Hon'ble Commission in Tariff Order for FY 2022-23 is relevant and presented below:

> *"There is a tendency among the category of LT Domestic, General Purpose and HT Bulk Supply Domestic etc. consumers who don't pay delayed payment surcharge to be negligent towards bill payment once the due date is over. Therefore, it is directed that LT Domestic, LT General Purpose and HT Bulk Supply Domestic consumers will get 10*

paise/unit rebate for prompt payment of the bill within due date. Thereafter, if the bill is paid within the next due date, there shall be no Rebate/Delayed Payment Surcharge. But if it is paid beyond the next due date then there shall be a Delayed Payment Surcharge of 1% of the billed value for each month of delay."

The Hon'ble Commission is, therefore, requested to kindly consider re-introducing the DPS for LT Domestic, LT General Purpose and HT Bulk Supply Domestic Consumers. However, the Due Date for the payment can be extended from the normal 7 days to the next due date as made applicable in the past.

9.7 Pro rata Billing

The attention of the Hon'ble Commission is drawn towards importance of pro-rata billing for Tariff Slab applicability in case of billing being in deviation to the monthly billing cycle. The relevant Regulation for Billing Cycle is reproduced below:

"109(i) The meter shall normally be read ***on fixed date ± 3 working days for monthly billing cycle****. The licensee/supplier shall issue proper photo identity cards to all meter readers and meter readers shall carry the photo identity card during the course of meter reading. (****Emphasis Supplied****)"*

While the Discoms are working towards achieving the above norm under normal conditions, the Hon'ble Commission is cognizant of the uncontrollable climatic conditions such as Kalbaisakhi, monsoons and extremely high temperature during summer months which beset Odisha regularly, that effect normal meter reading billing cycles. While occurrence of such events result in extension of billing period beyond the + 3 working days for monthly billing cycle, processes are being put in place to ensure that subsequent month's billing is done earlier than 30 + 3 days so as to ensure that over two billing cycles, the billing period is largely restored as per norms. The relevant Regulation with respect to pro-rata monthly billing is reproduced below:

"148. The charges payable by a consumer for supply of electrical power and other sums payable to the licensee/supplier shall be billed ***on pro-rata monthly basis*** *indicating the period for which charges have been levied.* ***When supply to a new consumer is commenced or an agreement is terminated on a day other than the first day of a month****, demand charges and other charges as applicable under tariff notification*

shall be levied pro-rata for the number of days during the month for which supply shall have been given or agreement shall have been in force."

*(**Emphasis Supplied**)*

The issue of Pro-rata Billing in case of deviation of billing from 30 days billing cycle was clarified by the Hon'ble Commission vide letter dated 06.06.2022, wherein pro-rata billing was denied in all cases other than in cases of commencement or termination of supply on a day other than the first day of a month. The Discoms were further directed to follow Regulation 109 (on billing cycle period). The clarification, however has not addressed the situation where the billing, for various reasons , cannot be carried within the stipulated norms as per regulation 109 of the Supply Code,2019.The relevant extract from the above referred letter is reproduced below:

*"A harmonious reading of the Regulation 148 of the OERC Distribution (Conditions of Supply) Code, 2019 reveals that the prorata billing should be adopted only in cases when supply to a new consumer commenced or an agreement is terminated on a day other than first day of a month. **Prorata billing should not be adopted in other cases including the case of spot billing** as provided under Regulation 147 of the OERC Distribution (Conditions of Supply) Code, 2019. **Regulation 109 of the OERC Distribution (Conditions of Supply) Code, 2019 shall be strictly followed by DISCOMs without any deviation**."*

Considering that Billing on the fixed date every month (+ 3 days) may not be feasible for reasons as explained above, it is submitted that the Hon'ble Commission may kindly consider permitting pro-rata adjustment of Slabs limits based on actual days of billing vis a vis the standard norm of 30 days (365 Days/ 12) to ensure that the Consumers get the full slab benefit under all actual billing period scenarios (vis a vis the norm).

An illustration to demonstrate the impact on Consumer Bill, of the tariffs applied for 'Fixed Slabs' irrespective of the number of days of billing vis-à-vis the same tariff being applied to 'Pro-rata Slab' based on actual no. of days billing' is provided below:

Sr No.	Particular	UoM	Scenario-1	Scenario-2	Scenario-3
1	Actual Billing Days	Days	33	27	30
2	Standard Monthly Billing Days (365/12)	Days	30	30	30
3 = (1/2)	Pro-Rata Factor	No	1.1	0.9	1
4	Total Billed Unit for the Month	kWh	500	500	500

Scenario -1 Actual Days of Billing: 33 days, Pro-Rata Factor: 1.1 (33/30)						
Slabs for Domestic Consumers	Energy Charges for Slab (Rs./kwh)	Standard Slab (Existing Practice) in kwh	Adjusted Slab on Pro-rata basis (Proposed Method) in kwh	Energy Charges as per existing method of Billing (Rs.)	Energy Charges as per proposed method of Billing (Rs.)	Difference (Rs.)
	A	B	C = B X Pro-Rata factor	D = A x B	E = A X C	F = D-E
0-50	3	50	55	150	165	-15
50-200	4.8	150	165	720	792	-72
200-400	5.8	200	220	1160	1276	-116
>400	6.2	100	60	620	372	248
Total		**500**	**500**	**2650**	**2605**	**45**

Scenario -2 Actual Days of Billing: 27 days, Pro-Rata Factor: 0.9 (27/30)						
Slabs for Domestic Consumers	Energy Charges for Slab (Rs./kwh)	Standard Slab (Existing Practice) in kwh	Adjusted Slab on Pro-rata basis (Proposed Method) in kwh	Energy Charges as per existing method of Billing (Rs.)	Energy Charges as per proposed method of Billing (Rs.)	Difference (Rs.)
	A	B	C = B X Pro-Rata factor	D = A x B	E = A X C	F = D-E
0-50	3	50	45	150	135	15
50-200	4.8	150	135	720	648	72
200-400	5.8	200	180	1160	1044	116
>400	6.2	100	140	620	868	-248
Total		**500**	**500**	**2650**	**2695**	**-45**

Scenario -3 Actual Days of Billing: 30 days, Pro-Rata Factor: 1 (30/30)						
Slabs for Domestic Consumers	Energy Charges for Slab (Rs./kwh)	Standard Slab (Existing Practice) in kwh	Adjusted Slab on Pro-rata basis (Proposed Method) in kwh	Energy Charges as per existing method of Billing (Rs.)	Energy Charges as per proposed method of Billing (Rs.)	Difference (Rs.)
	A	B	C = B X Pro-Rata factor	D = A x B	E = A X C	F = D-E
0-50	3	50	50	150	150	0
50-200	4.8	150	150	720	720	0
200-400	5.8	200	200	1160	1160	0
>400	6.2	100	100	620	620	0
Total		**500**	**500**	**2650**	**2650**	**0**

As can be observed from above, pro-rata billing for slab adjustment based on actual no's of days of billing vis a vis the standard norm of 30 days is just and equitable for Consumers as it compensates the consumers for any deficit in slab benefit in a particular month (less than one month) in the subsequent month where the Billing is for more than 30 days.

It is further submitted that similar methodology of pro-rata Slab adjustment is adopted by various States.

In view of the above explained difficulties in ensuring billing all the time within the stipulated norms, the Hon'ble Commission is requested to permit pro-rata billing for any deviation from the billing cycle of 30 days as explained above.

10. Formats

The following filled in formats will form a part of the revised ARR and Tariff Application for FY 2023-24 as annexures.

10.1 Commercial/Technical Formats T1-T9
10.2 Financial Formats F1-F27
10.3 Details Performance Formats (P1-P17) in Vol- II

11. Prayer

In the aforesaid facts and circumstances, the utility prays that the Hon'ble Commission may be pleased to:

- Take the revised ARR application and Tariff Petition on record.
- Approve the Aggregate Revenue Requirement for FY 2024-25.

  Allow additional R&M and additional A&G cost for special drive for the ensuing year FY 2024-25 out of surplus revenue generated / to be generated from current year along with efficiency gain and additional sale though proposed tariff rationalisation measures without burdening the consumer of the state assuming no increase in BST & Transmission charges.

  Allow the following Tariff rationalisation measures as proposed along with continuation of existing consumer benefit schemes:

  Continuation of:

  - Digital rebate to 4% for LT Domestic, LT GP single phase & Single-phase irrigation consumers
  - Discount of 10 paise to Domestic Rural Consumers if consumed on actual meter reading
  - Levy of CSS on RE power
  - Special tariff to steel industries at 33 kV level without having CGP
  - Continuity of Special tariff for industries having CGP with CD up to 20 MW without prior approval of GRIDCO
  - Special tariff for Existing industries having CGP with CD >20 MW with minimum offtake 80% of existing CD with TPA among GRIDCO, DISCOM & Consumer.
  - Continuation of Green Tariff Premium (GTP) mechanism.

New proposals:

- Additional Rebate of Rs.10/ - p.m. if opted E-Bill.
- Processing fee for each services as per Regulation.
- Uniform Tariff for a specific category of Consumer as per load instead of Voltage of Supply.
- Charges for Temporary Supply
- Creation of Category for Mega lift points under EHT with demand charges of Rs.250 per kVA and energy charges under graded slab method.
- Special tariff for industries those who have closed their units if reopen/starts.
- Special tariff for existing industries who have no CGP for drawl of additional power beyond CD of 10 MVA.
- Special tariff for Industries for temporary business requirement.
- Minimum offtake for the industries having CGP
- Revision of Reconnection Charges with penalty clause.
- Billing with Defective Meter. (Practice direction)
- Combined Application form replacing Form-I & Form-II
- Creation of Energy Police station.
- Assessment with LF basis in case of unauthorize use of electricity.
- Meter cost to be included in CAPEX instead of Meter rent
- Levy of DPS on electricity bills
- Pro-rata billing
- Other proposals as proposed in this application
- Allow the Licensee to submit additional documents, modify the present petition, if so required, during the proceeding of this application.

Any other relief, order or direction which the Hon'ble Commission deems fit.

By the Applicant

Through its Authorized representative.

Dated:

Place: