

WESCO now **TPWODL**

**REJOINDER TO OBJECTION
RECEIVED AGAINST
OPEN ACCESS CHARGES
APPLICATION FOR THE YEAR
2021-22**

(OERC CASE NO. 79 OF 2020)

**WESCO UTILITY
(now TPWODL)**

TP WESTERN ODISHA DISTRIBUTION LIMITED

(A Tata Power and Odisha Government Joint Venture)

TPWODL Regd./Corporate Office, Burla

District-Sambalpur, Odisha-768 017

CIN:U40100OR2020SGC035230

Ph.(0663)2431984, Fax (0663)2432113

e-mail: tpwodl@tpwesternodisha.com, www.tpwesternodisha.com



I N D E X

SI	NAME OF THE OBJECTOR	PAGE No.
1	Sri Ananda Kumar Mohapatra, Power Analyst, S/o-Jachindranath Mohapatra, Plot No. 639/1021, Laxmi Vihar, Basuaghai, Badagada, Tankapani Road, Ps-Badagada, Bhubaneswar, Dist-Khurda-751002.	01
2	M/s. Grinity Power Tech Pvt. Ltd., At-K-8-82, Kalinga Nagar, Ghatikia, Bhubaneswar-751029.	02
3	Er.(Dr) P. K. Pradhan, Duplex-244, Manorama Estate, Rasulgarh, Bhubaneswar-751010.	03
4	M/s Vedanta Ltd., Aluminium & Power, Vill-Bhurkamunda, P.O: Kalimandir, Dist.-Jharsuguda-768202.	04 to 06



BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION BHUBANESWAR
PLOT NO.4, CHUNOKOLI, SHAILASHREE VIHAR, CHANDRASEKHARPUR, BHUBANESWAR-751023.

IN THE MATTER OF

Rejoinder to the objection raised by objectors against Open
Access application for FY 2021-22 vide case no. 79 of 2020.

AND

IN THE MATTER OF

Wesco Utility (Now TPWODL)
Corporate Office Burla, Sambalpur, Odisha-768017

-----Licensee

**Affidavit verifying the rejoinder to the application for the Open Access Charges
for FY 2021-22**

I, Kshirod Chandra Nanda, Son of Late Radhanath Nanda, aged about 51 years,
residing at, Burla, Sambalpur, Odisha do hereby solemnly affirm and state as
follows:-

I am the Deputy General Manager (Finance & RA) of Wesco Utility (Now TPWODL),
Corporate Office-Burla, Sambalpur, Odisha-768017.

The statements made above along with the annexures annexed to this rejoinder 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 *SAMBALPUR*
Date *18 Feb. 2021*

Kshirod Chandra Nanda

DEPONENT

DGM (Finance & RA), WESCO Utility (Now TPWODL)

Identity the deponent:

(B.B. MEHER)
Advocate, Sambalpur
Regd. No.386/79

The deponent solemnly affirm before
me today at.....*11.00*.....A.M/P.M.
being identified by Sri.....*Self*.....
.....Advocate, Sambalpur

NOTARY, Sambalpur



Sl. No...*255*...Dt....*18/2/21*
(B.B. MEHER)
NOTARY, Sambalpur

Case No.79 of 2020

In the matter of : WESCO Utility (Now TPWODL)

And

In the matter of : Sri Ananda Kumar Mohapatra, Power Analyst, S/o-Jachindranath Mohapatra, Plot No. 639/1021, Laxmi Vihar, Basuaghai, Badagada, Tankapani Road, Ps-Badagada, Bhubaneswar, Dist-Khurda-751002.

Rejoinder to objections received by the Secretary, Odisha Electricity Regulatory Commission against the Open Access Charges Application by Licensee for the year 2021-22.

As the objector has given common reply against Case No. 75/2020 & 79/2020, rejoinder given against Case No. 75 of 2020 may kindly be referred.

For and on behalf of WESCO Utility(now TPWODL)

Kehiral Chandra Namaka.

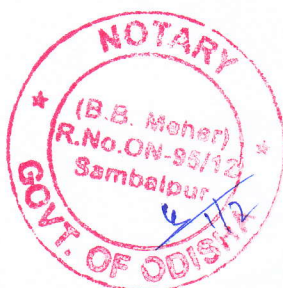
Burla

DGM (Finance & RA)

Dated: *1st Feb, 2021*

C.C. : Sri Ananda Kumar Mohapatra, Power Analyst, S/o-Jachindranath Mohapatra, Plot No. 639/1021, Laxmi Vihar, Basuaghai, Badagada, Tankapani Road, Ps-Badagada, Bhubaneswar, Dist-Khurda-751002.

Note- This is also available at the licensee's website-<https://www.tpwesternodisha.com>



Case No.79 of 2020

In the matter of : WESCO Utility (now TPWODL)
And

In the matter of : M/s. Grinity Power Tech Pvt. Ltd., At-K-8-82, Kalinga Nagar, Ghatikia,
Bhubaneswar-751029.

Rejoinder to objections received by the Secretary, Odisha Electricity Regulatory Commission against the
Open Access Charges Application by Licensee for the year 2021-22.

Cross Subsidy Surcharge & reduction thereof:

Hon'ble Commission while approving the cross subsidy surcharge payable, allowing certain percentage of computed value. On the computed value recovery is allowed to the extent of 63%. Last year it was 65%. Therefore, recovery of cross subsidy is in reducing trend.

Additional Surcharge:

In line with National Tariff policy additional surcharge is leviable to recover the fixed cost of generation power capacity, stranded due to open access. Here, the DISCOM is entirely sourcing its power from GRIDCO and GRIDCO is procuring from different generator as per PPA. A consumer having contract demand with the DISCOM is reserving its capacity to draw on its need. Based on the CD of the industry and pattern of use, DISCOM is projecting its sale in the ARR. Considering the projected sale OERC is fixing BSP for the DISCOM. So, when a consumer opting for open access is denying the DISCOM power & in turn drawal from GRIDCO reduces and fixed cost incurred by GRIDCO for generator cannot be prevented.

Most of the neighboring states have also fixed Additional surcharge in similar manner.

Open Access beyond CD:

The intention of restricting open access to the extent of CD is to protect the system for which it is being paid for. Net work assets has its own capacity and limit, continuous stress would definitely affect the network assets adversely for which needs to be compensated.

For and on behalf of WESCO Utility(now TPWODL)

Keshinod Chandra Nanda

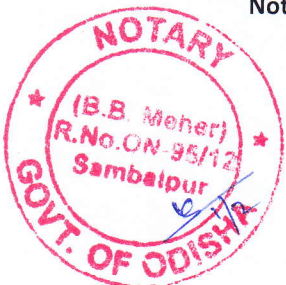
DGM (Finance & RA)

Burla

Dated *1st Feb. 2021*

C.C. : M/s. Grinity Power Tech Pvt. Ltd., At-K-8-82, Kalinga Nagar, Ghatikia, Bhubaneswar-
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In the matter of : WESCO Utility (now TPWODL)
And

In the matter of : Er.(Dr) P. K. Pradhan, Duplex-244, Manorama Estate, Rasulgarh,
Bhubaneswar-751010.

Rejoinder to objections received by the Secretary, Odisha Electricity Regulatory Commission against the Open Access Charges Application by Licensee for the year 2021-22.

Cross Subsidy Surcharge & reduction thereof:

Hon'ble Commission while approving the cross subsidy surcharge payable every year allowing certain percentage of computed value. Now from computed value recovery is allowed only 63%. Last year it was 65%. Therefore, recovery of cross subsidy is in reducing trend.

Consideration of HT Loss 3%:

Ther permissible loss allowed by Hon'ble Commission @8% considering the HT loss in it's entirety. In the energy audit report as conducted for few feeders in some cases it may be less than 8% but in other cases it may be more. Unless entire feeders are put into audit purview exact loss may not be established. Therefore, the HT loss 8% needs to kept for calculation purposes.

Non-levy of CSS for Renewable power:

The suggestion given by the respondent may be considered as industries RPO obligation needs to be fulfilled through capacity enhancement in solar or any other renewable sector not through purchasing the renewable power through open access. Renewable power needs to be assigned to GRIDCO or DISCOMs for benefit of the LT consumers.

Open Access to be permitted within CD:

The intention of restricting open access to the extent of CD is to protect the system for which it is being paid for. Net work assets has it's own capacity and limit, continuous stress would definitely affect the network assets adversely for which needs to be compensated.

For and on behalf of WESCO Utility(now TPWODL)

Signature of Chandra Nandan

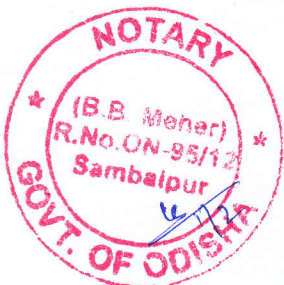
DGM (Finance & RA)

Burla

Dated: 1st Feb 2021

C.C. : Er.(Dr) P. K. Pradhan, Duplex-244, Manorama Estate, Rasulgarh, Bhubaneswar-751010.

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In the matter of : WESCO Utility (now TPWODL)
And

In the matter of : M/s Vedanta Ltd., Aluminium & Power, Vill-Bhurkamunda, P.O:
Kalimandir, Dist.-Jharsuguda-768202.

Rejoinder to objections received by the Secretary, Odisha Electricity Regulatory Commission against the Open Access Charges Application by Licensee for the year 2021-22.

Cross Subsidy Surcharge & reduction thereof:

Hon'ble Commission while approving the cross subsidy surcharge payable every year allowing certain percentage of computed value. Now from computed value recovery is allowed only 63%. Last year it was 65%. Therefore, recovery of cross subsidy is in reducing trend.

Odisha's CSS is higher as a result Open Access not affordable:

The quantum of open access drawal by M/s Vedanta Ltd vs Grid drawal for last two year is appended below

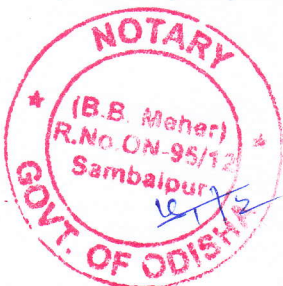
<u>SEZ-unit</u>	<u>Open Access Drawal(MU)</u>	<u>Drawal from DISCOM (MU)</u>
2018-19	2315 (including 176 MU from CGP)	64.194
2019-20	1530 (including 777 MU from CGP & IPP)	120.213
2020-21 (till Dec-20)	816 (including 701 Mu from CGP & IPP)	57.57

The above table indicates M/s Vedanta's drawal under open access vs Grid drawal. It indicates that M/s Vedanta Ltd is much interested to purchase under open access having higher CSS in Odisha (as claimed by Respondent) which is not true.

Method of Calculation of CSS:

Cross Subsidy on tariff and cross subsidy surcharge payable both are different in nature. Hon'ble Commission while approving the ARR & Open access charges has clearly explained the logic and manner. Para 344 to 351 of RST order FY 2020-21 may please be referred.

In line with National Tariff policy additional surcharge is leviable to recover the fixed cost of generation power capacity stranded due to open access. Here, the DISCOM is entirely sourcing its power from



GRIDCO and GRIDCO is procuring from different generator as per PPA. A consumer having contract demand with the DISCOM is reserving it's capacity to draw on it's need. Based on the CD of the industry and pattern of use, DISCOM is projecting it's sale in the ARR. Considering the projected sale OERC is fixing BSP for the DISCOM. So, when a consumer opting for open access is denying the DISCOM power & in turn drawal from GRIDCO reduces and fixed cost incurred by GRIDCO for generator cannot be prevented.

Most of the neighboring states have also fixed Additional surcharge in similar manner.

Additional Surcharge/Recovery of stranded cost:

In line with National Tariff policy additional surcharge is leviable to recover the fixed cost of generation power capacity stranded due to open access. Here, the DISCOM is entirely sourcing it's power from GRIDCO and GRIDCO is procuring from different generator as per PPA. A consumer having contract demand with the DISCOM is reserving it's capacity to draw on it's need. Based on the CD of the industry and pattern of use, DISCOM is projecting it's sale in the ARR. Considering the projected sale OERC is fixing BSP for the DISCOM. So, when a consumer opting for open access is denying the DISCOM power & in turn drawal from GRIDCO reduces and fixed cost incurred by GRIDCO for generator cannot be prevented.

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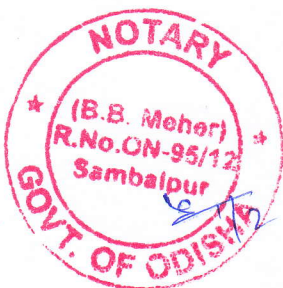
CSS for peak & off peak hours:

The intention of different CSS for both peak and off peak is to maintain harmony with regards to drawal from Discom during peak & off peak. As the consumer is eligible for TOD tariff in off peak hours is trying to off set the open access drawal with drawal from DISCOM and vice versa.

As regards to tariff of two types of CSS for peak & off peak the difference may be to the tune of TOD benefit.

There should be an annual plan for open access drawal:

The licensee is planning it's Annual requirement of power purchase & sales based on the CD and drawal pattern of the consumers. Hence, deviation if any due to open access drawal is affecting the revenue of the licensee as well as power purchase price. Therefore, a tentative annual plan would facilitate the licensee to plan it's Bulk power requirement in the ARR.



Refused Chandra Nandan

Drawal of Open Access more than the CD:

The intention of restricting open access to the extent of CD is to protect the system for which it is being paid for. Net work assets has it's own capacity and limit, continuous stress would definitely affect the network assets adversely for which needs to be compensated.

For and on behalf of WESCO Utility(now TPWODL)

Kshirod Chandra Nanda

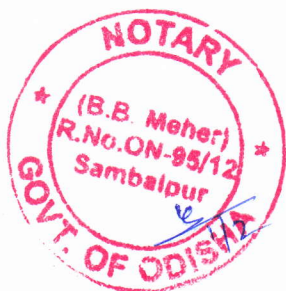
Burla

DGM (Finance & RA)

Dated: *1st Feb 2021*

C.C. : M/s Vedanta Ltd., Aluminium & Power, Vill-Bhurkamunda, P.O: Kalimandir, Dist.-
Jharsuguda-768202.

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12/2/2021
(B.B. MEHER)
NOTARY, Sambalpur
Regd. No.ON-95/12