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ASSOCIATION OF INDUSTRIES DEWAS

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AID/MPERC/23-24/

Date 17.01.2024

MADHYA PRADESH ELECTRICITY REGULATORY COMMISSION
5TH FLOOR, METRO PLAZA,
ARERA COLONY, BITTAN MARKET,
BHOPAL, MADHYA PRADESH -462016

BEFORE THE MADHYA PRADESH ELECTRICITY REGULATORY COMMISSION IN THE MATTER OF:

Filing of Petition for Determination of Revised ARR for FY 2024-25 and Tariff Proposal or Distribution & Retail Supply Business of Distribution licensees namely Madhya Pradesh Poorv Kshetra Vidyut Vitaran Co. Ltd. (East Discom), Madhya Pradesh Madhya Kshetra Vidyut Vitaran Co. Ltd. (Central Discom) & Madhya Pradesh Pashchim Kshetra Vidyut Vitaran Co. Ltd. (West Discom) and MP Power Management Co. Ltd. (MPPMCL) for FY 2024-25 under the tariff principles laid down in the "Madhya Pradesh Electricity Regulatory Commission (Terms and Conditions for Determination of Tariff for Supply and Wheeling of Electricity and Methods and Principles for Fixation of Charges) Regulations, 2021 dated 03rd December 2021" and its amendments thereof.

Reference- Public notice no. No. MPERC / 2023/2932 Bhopal, Dated: 21/12/2022 (Petition No.73 / 2023).

MOST RESPECTFULLY SUBMITTED-

Association of Industries Dewas represents Electricity consumers of all categories and the view expressed are not only to safeguard the interest of the consumers but also make electricity distribution companies more efficient, more professional and for adopting of new techniques and technologies.

The Association of Industries Dewas is a registered Association and has regularly participated in the public hearing on ARR and retail tariffs, held by M .P. Electricity Regulatory Commission year to year from the year 2001.



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The Hon'ble Commission admitted the petition and ask the objection, comments and suggestions from the stake holders vide newspaper advertisement dated 21.12.2023.

The Association of Industries Dewas express their utmost gratitude for the opportunity given by the Hon'ble Commission to represent the case and place their objection, comments and suggestion on the ARR and tariff proposals submitted by the Distribution Licensees.

We hope that the Commission will take necessary action to make easier tariff and also safe guard the interest of all categories of consumers judicially.

We welcome the proposal made by the Distribution Licensees for the following proposal proposed in the Tariff proposal –

1. To continue the rebate to existing H T consumer without change of base year it will be helpful to industries as well as Discóm also to sale of surplus power.
2. Rebate of Re.1.00 per unit or 20%, whichever is lower for new HT Connections for which Agreements were finalized in 2016-17 up to 2024-25.
3. Simplification of Tariff slabs in LV-1.2 Domestic Tariff –We welcome the proposal to reduce the tariff slabs and welcome to remove of above 300 units slab.

4. Introducing KVAH billing for HT category –

We welcome to proposal of Discoms to introduce KVAH BILLING Because various advantages of switching over to kVAh billing to both licensee and consumers and KVAH billing help to consumer to improve the power factor and they will get more incentive and less penalty. as in H T power factor penalty is maximum 35 % while in case of L T consumer it is 10% only.

As the incentives and penalties are inbuilt in the kVAh billing it will reduce the complexities in billing and will encourage the consumers to maintain near unity Power factor to achieve loss reduction, improve system stability, power quality and improve voltage profile.

5. Introduction of TOD Tariff for Non-Domestic and Industrial consumers having maximum/contracted demand more than ten Kilowatt:
6. The Electricity (Rights of Consumers) Amendment Rules, 2023 mandated introduction of the Time of Day tariff for Commercial and



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Industrial consumers having maximum demand more than ten Kilowatt from a date not later than 1st April, 2024. Accordingly, the proposal of the Time-of-Day Tariff for non-Domestic and Industrial consumers having maximum/contracted demand more than ten Kilowatt is welcome step and it was demanded by the Association since long time.

Our objections, comments and suggestions on various issue related with ARR and tariff proposals as under-

Grid Support Charges under Net Metering:

The Discom has proposed the Grid Support Charges for which our Association strongly opposes the proposal because it is not true that Discom bear the expenditure while the consumers are bear expenditures to install the Grid Interactive Renewable Energy Systems which also helpful to cater the energy demand of the licensee without any capital expenditures. It is well known fact that installation of power plant is very costly affairs and without any expenditure the licensee added hung power on the cost of consumer. Further while considering any such proposal Hon'ble commission should consider the following points-

1. It is also against Government of India policy for Zero carbon for which Hon'ble prime minister of India appeal to install the solar plant to save Earth and life of the public and to help the world free with the disadvantage of the Coal based plants.
2. Government of India vide circular No F. No. 09/01/2023-RCM Dated 25th October 23 regarding imposition of Charges by various State Governments on various forms of generation of electricity - from Hydropower/ Renewable/ Thermal etc. had clarified the above legal position and power to impose any tax or duty on the generation of electricity by any state Government / ERC have no power. **(Copy of circular is enclosed)**
3. It is seen that hidden policy of Discom to discourage the Installations of solar and other Grid Interactive Renewable Energy Systems because the state having surplus power.
4. Government of India Ministry of power vides its letter dated 24.04.23 also advice to withdrawn the any taxes /duties if levied and recovered. (The copy of letter and circular is enclosed.)
5. The reference of MERC given by it is fact that MERC also differ till 2025 these charges and now in view of circular and instruction no any taxes or surcharge etc can be levied on Generation by the State please refer the circular which has been enclosed as ANX-1



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Our silent points are as under on proposed ARR 2024-25

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1. The Distribution Licensees propose hike about average 3.84 % in LT categories i.e. Rs 1493 crore and incase of HT average hike 3.91% i.e. Rs 553 crore total Rs 2046 crore is very high while the average cost of supply in Madhya Pradesh is high as compare to other nearby States. Hon'ble Commission may thoroughly check the provisions of various expenditures heads as well as revenue income.

2. 1.25% per month (15% p.a.) whereas DISCOMs pay interest at the Bank Rate only on consumers Security Deposit. The rate of late payment Surcharge should be aligned with present Bank Rate.

3. Commission considered the increase cost of power through Fuel and Power Purchase Adjustment Surcharges (FPPAS) and its review every month by the commission and every month new rates are decided by the commission which may be positive or negative rates, in past when FCA was charged the impact of negative charges given in same quarter but it is not understood why Fuel and Power Purchase Adjustment Surcharges (FPPAS) when calculated Negative the impact not given which in same month and impact given /adjusted when positive resulted the loss of interest and also cash flow management of the consumer . It is requested Hon'ble commission to give the effect every month either positive or negative as it was done in FCA.

Fuel and Power Purchase Adjustment Surcharges (FPPAS) revise every month Hence the power purchase cost has already meet out and there should be no additional burden towards power purchase cost which is almost 80% cost of total ARR.

The overall availability for MP State (from stations allocated to Discoms as well as stations allocated to MPPMCL) as under-

PARTICULARS	MU
Ex Bus Availability	118120
Ex bus Energy required by Discoms	97877
Back down of power including sale of Surplus power	20243
Back down	14158
IEX rate paisa/kwh	470.40
Revenue from sale of power Rs.crs.	2981
Profit for sale of surplus power Rs in crs.	1329



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In ARR it is proposed that the backing down of power due to surplus power has been proposed from various stations is 20243MU and as per ARR it is it is evidence that 6085 MU Energy is available for sale in open market. The Power management companies propose to sale energy through IEX @489.90paisa per unit and thus from sale of surplus energy an amount of profit Rs 1329 crore will be earned during the year 2024-25 and thus the revenue gap will reduce and Hon'ble commission requested to consider this point while finalizing him ARR. However in this regards our suggestion are as under-

Management of surplus power –

The surplus power can be consumed if the night rebate will be increase. In the last tariff order night rebate was reduced from 20% from the month of April to October to 10%. This may please be revoke to 20 % during the year for all 12 months during off peak hours (10 PM to next day 6 AM).

The TOD segments introduced to all L T Industrial /Commercial consumers having load 10 KW and above is welcome step and some L T Industrial consumer load of L T industries will be shift in night hours. The entire Industrial consumer having the meter to record the consumption as per TOD. The consumers will also having opportunity to use the chipper power during the Night Hours.

POWER PURCHASE COST

The purchase of power cost is a major element in expenditure the proposed power purchase cost excluding other cost related to power purchase including interstate transmission charges and intra state charges, needs detailed scrutiny. The Association submits third party experts in the field of power generation and power trading, should monitor and evaluate the costs it is also requested why the short term power purchase required needs attentions of commission.

The points which require further scrutiny are:-

The availability of power is much more against the requirement in spite of additional capacity created.

Total back down of power to the extent of 14158 MU needs an independent scrutiny. This backing down needs to be examining whether such backing down is in State Interest and whether such surplus power can be used in other states, without a financial loss to our state.

The surplus power available and cost of power is another matter of scrutiny the power management company should examine to terminate the agreement as we are paying the fixed cost to such power companies without purchasing single unit as per agreement.

It is requested to the Commission that The proposed O&M Expenses, Employee Costs, Administrative & General Expenses, Repair and Maintenance Expenses,



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Capital Investment Plan. Scheme Wise Capitalization, CWIP, Fixed Assets Addition etc. needs to be verifying from other agency for its correctness.

The company also shown in the ARR regarding expenses towards Repairs and Maintenance, Employees cost and A&G expenses on the basis Regulation. However, over and above provision made in ARR needs proper justification, the actual cost always less then as per provision. It is requested kindly allow the actual cost at the time of True up. As per Regulation Distribution Licensees are not incurred expenditure on Employees, Repairs and Maintenance, and A&G expenses, as per Regulations expenditure then the services to the consumers will be quite good.

Proposed Tariff Schedule for 2024-25

Alignment of Existing TOD structure with MoP Rules

The Ministry of Power vide its Electricity (Rights of Consumers) Amendment Rules, 2023 dated 14 June, 2023 has stipulated various provision for TOD Tariff during peak, normal as well as solar hours.

However, the existing provisions of TOD are more practical and also suitable to consumer as well as Discoms also. The surplus power is being used in appraisable cost in night hours and also got more revenue from present system.

2. Without any study of load curve and without any data changes in TOD structural is not desirable.

3. The Madhya Pradesh state is having surplus power and surplus power sold to chipper cost and proposal of Discom to charge@1.2 time in peak hours are not desirable.

4. As per table no 170 the period of peak hours and solar period propose as under -

Morning Peak 06.00 Hrs – 09.00 Hrs

Evening Peak 17.00 Hrs – 22.00 Hrs

Normal Hours 22.00 Hrs – 06.00 Hrs

Solar Hours 09.00 Hrs – 17.00 Hrs

(Off Peak Hours)



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From the above table it is evidence that no study has been done by the Discoms. No such data's are made available to decide the peak hours and also solar hours. In the State of Madhya Pradesh first data should be made available to decide the load patters and when morning peak as well as evening peak occurred in absence of details cannot be considered the peak hours and solar hours proposed by the Discom cannot be acceptable.

The Hon'ble commission requested to direct Power Management company to submit the details of load study and load curve etc and approach paper may also be issued by the commission to obtain the view of stockholders. It is further requested to commission till deeply study and reliable data received the present TOD method should be continued.

Our objection and suggestion on proposed tariff as under-

High Tension Tariffs

H V 3 Industrial - Non industrial, shopping mall & Power incentive industries-

Request for tariff minimum units-

Due to Tariff minimum units small H T consumers as well as those consumers converted from L T Industrial to H T connection are suffering from the tariff minimum units. Hence it is requested that the tariff minimum units for all H T consumer category needs to be removed and actual consumption to be taken. It is also evident that the actual consumption in 90% industries is very high and more than tariff minimum. It will be very helpful for small industrial consumers as big and medium industries consumption is more than TMC units.



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The average costs of unit to such small H T consumers are ranging from Rs 15 to 20 per unit and such type of consumers are less than 1 % of total H T consumer. The aim of the tariff minimum units fulfill by the another consumers and Distribution Licensees is not suffered any revenue loss.

Rebate for existing HT connections:

A rebate of Rs one per unit is approved by the commission in energy charge for incremental monthly consumption w.r.t consumption of FY 2015-16, same month. In ARR the Discom proposed to continue it up to 2024-25 and should be continue as proposed by the Discom.

It is also welcome that all connection which all gating rebate new connection rebate to be continue up to 2024-25 considering the surplus power in the state.

In TOD segment the surplus power is available during night Hours hence during off period time power is surplus during night hours. i.e. 22 Hrs to 6 AM the rebate should be given 20%. In the Tariff order issued by the commission, this rebate has been revised and from April to October it is 10% and from November to March 20 % it is requested Hon'ble commission it should be 20 % for whole year for all 12 months.

SEASONAL HV-4-

Hon'ble commission requested that the condition for billing of LT Industrial seasonal consumers may please be retain as it is it was given in the tariff order 2023-24:-

1.7 Minimum charges shall be billed as follows:

1. The consumer shall be billed one twelfth of annual minimum consumption (kWh) specified for their category each month in case the actual consumption is less than above mentioned minimum consumption. However, for Seasonal consumers the annual minimum consumption shall be equally distributed during seasonal months and during off season only actual consumption shall be considered for billing subject to adjustment of actual cumulative consumption against cumulative minimum consumption.

Request for seasonal consumer-

Due to change of crop patten as well as monsoon, the cotton crops comes around in the month of September and till end of April the cultivator's sale their crop. The off-season period for seasonal consumer should be 4 months in place of 6 months as per consumer option.

Due to change of policy of Central Govt. ginning & pressing Industries is not able to consumed even TMM units. Hence as proposed above off season period for



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seasonal consumer should be kept for 4 months in place of 6 months as per consumer request.

In this connection it is brought in to knowledge that during the year 2002-2003 the period of season was minimum period of 4 month and maximum period of 9 month in a year .(Kindly refer tariff order 2002-2003 page no 244 of tariff order). Further in the year 2004-05 it was minimum period of four months and a maximum period of eight months in a year.

It is appreciated that during off season billing on actual consumption in case of Ht consumers.

Use of Load for temporary purpose in HT premises:-

It is proposed that in case of temporary purpose, 10% of sanctioned load is allowed to be used for construction for expansion/renovation/modification should allowed from the existing HT connection on the same tariff applicable for permanent connection. At present the consumers are facing difficulty and harassment in the name of checking.

It is well known facts that small construction and modification is always required in the industries and it is part of industrial activity hence it is very important for H T consumer to allow 10% load of contact demand for such activity.

Income from other sources-

The Discoms are charging the charges from the cable operator and also from Communication Company and other advertize company etc for uses of their pole and other infrastructure but in tariff and its format it is not shown how much income from these sources in this aspect our request is as under-

Whether the Discom has notified the rates for use of their property and having agreement with users?

How much income from this uses which has not been shown in the ARR.

Whether the infrastructure other than Discom used by these users the charges collected by Discom?

Such full details should be asked by commission from Discom as maximum poles used by different agency and hung amount can be collected by the Discom.

LT INDUSTRIAL

In case of consumers having contract demand up to 25 HP, the energy charges and fixed charges shall be billed at a rate 30% less than the charges applicable to



Estd. 1978

ASSOCIATION OF INDUSTRIES DEWAS

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other consumer and the request to revoke the condition 2016-17 may kindly be considered by the Hon'ble Commission.

Seasonal consumers: - Discom has proposed to withdraw the billing on actual consumption during off season as it was given from the tariff order 2023-24. This may please continue for this year as it has been proposed in case of HT seasonal consumers. It is also brought to the knowledge of Hon'ble Commission the facility of billing during off season on actual consumption is not being provided by the Discom and consumer is forced to 20% extra amount of normal charges on TMM unit billed during off season period. Commission is requested this extra amount may kindly refunded to consumers.

Other issue of Members of Association Dewas-

1. The HT consumers of Dewas are badly affected due to poor maintains of HT/ LT lines .They are suffering from frequent interruptions and brake down. The officers are requested so many times from the Association as well as by consumer but still they are facing problems. The Work of RRRD should be completed as early as possible. Further member's complaints that at present it is being observed that the routine shutdown plan is being taken by the MPPKVV Co. on any day, whereas it should be taken on Sunday. The Hon'ble commission is requested to give instruction for this.

2. Regarding stop payment through cheque.

Reference – Circular no MD/WZ/Com/05/8844 dated 22.07.2020 and our request letter dated 13.08.2020.

Kindly gone through the circular issued by the Director Commercial MPPKVV CO LTD Indore on dated 22.07.2020 regarding payment of bill etc. not to be accept through cheque.

Association of Industries Dewas oppose the circular issued against the supply code as well as provision of tariff order. The provisions in supply code 2021 as under-

9.2 The licensee shall ensure adequate publicity of the addresses/ locations and working hours of the collection centers including those of banks where consumers can make payments. The licensee shall provide a choice of maximum alternative modes of payment to the consumers like payment through cash, local cheque, bank draft, banker's cheque, Electronic Clearing System (ECS), credit card, drop boxes etc.



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Thus it is against the order of the commission and thus it is requested to Hon'ble Commission to instruct MPPKVV CO LTD Indore to withdraw this circular immediately.

Shri -R C Somani will represent before Commission during public Hearing.

**His mobile number and Email address as under-
Mobile Number 9827226933**

Email address-somani_rc@yahoo.com

Yours Faithfully,

For Association of Industries Dewas


Ashok Khandelia
President