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Ref. No. MERC/FAC/2020-21/E-Letter

Date: 27 July, 2020

The Managing Director

Tata Power Company Ltd.
Dharavi Receiving Station
New Shalimar Industrial Estate
Matunga, Mumbai – 400 019

Subject: Prior Approval of Fuel Adjustment Charges (FAC) submission of TPC-D for the month of June 2020.

Reference:

1. TPC-D's FAC submission dated 15 July, 2020 for prior approval of FAC for the month of June 2020.
2. Data gaps communicated to TPC-D vide email dated 16 July, 2020 and 20 July, 2020
3. TPC-D's complete response to data gaps by 25 July, 2020

Sir,

Upon vetting the FAC calculations for the month of June, 2020 as mentioned in the above reference, the Commission has accorded approval for charging FAC of Rs. (18.47) Crore to its consumers as shown in the table below:

Month	FAC Amount (Rs. Crore)
June, 2020	0 (Zero)

The Commission allows the accumulation of total FAC amount of Rs. 40.74 Crore which shall form part of FAC Fund and shall be carried forward to next FAC billing cycle with holding cost as per the Order dated 30 March, 2020 in Case No 326 of 2019. Further, as directed in the said Order, TPC-D shall maintain the monthly account of FAC Fund and upload it on its website to maintain transparency of FAC Fund and also for information of all the stakeholders.

TPC-D is directed to file their future FAC submissions taking into consideration data gaps raised in previous months to ensure timely prior approval.

Yours faithfully,
Sd/-
(Prafulla Varhade)
Director (EE), MERC



Encl: Annexure A: Detailed Vetting Report for the month of June, 2020.

PRIOR APPROVAL FOR FAC CHARGES FOR THE MONTH OF JUNE, 2020

Subject: Prior Approval of Fuel Adjustment Charges (FAC) submission of TPC-D for the month of June, 2020.

Reference: TPC-D's FAC submission dated 15 July, 24 July and 25 July, 2020 for prior approval of FAC for the month of June, 2020.

1. FAC submission by TPC-D:

1.1 TPC-D has submitted FAC submissions for the month of June, 2020 as referred above. Upon vetting the FAC calculations, taking cognizance of all the submissions furnished by TPC-D against the data gaps issued, the Commission has accorded prior approval to TPC-D for negative FAC amount of Rs. 18.47 Crore for the month of June 2020. The approved FAC amount shall be added to the existing FAC Fund and shall be carried forward to next FAC billing cycle with holding cost as per the Order dated 30 March, 2020 in Case No 326 of 2019 (herein after referred to as "Tariff Order").

2. Background

2.1 On 30 March, 2020, the Commission has issued Tariff Order for TPC-D, (Case No .326 of 2019) for True-up of FY 2017-18 and FY 2018-19, provisional Truing-up for FY 2019-20, and Aggregate Revenue Requirement and Tariff for FY 2020-21 to FY 2024-25. Revised Tariff has been made applicable from 1 April, 2020.

2.2 In the Tariff Order, the Commission has stipulated methodology of levying FAC as follows:

"6.7.15 Stabilising variation in consumer bill on account of FAC

.....

Therefore, using its powers for Removing Difficulty under Regulation 106 of the MYT Regulations, 2019, the Commission is making following changes in the FAC mechanism specified under Regulation 10 of the MYT Regulations, 2019:

a. Distribution Licensee shall undertake computation of monthly FAC as per Regulation 10 of the MYT Regulations, 2019 except for treatment to be given to negative FAC as follows:

(i) Negative FAC amount shall be carried forward to the next FAC billing cycle with holding cost;

(ii) Such carried forward negative FAC shall be adjusted against FAC amount for the next month and balance negative amount shall be carried forward to subsequent month with holding cost;

(iii) Such carry forward of negative FAC shall be continued till the accumulated negative FAC becomes 20% of monthly tariff revenue approved by the Commission in Tariff Order. In case of TPC-D, such limit shall be Rs. 50 crore. Any accumulated amount above such limit shall be refunded to consumers through FAC mechanism;

(iv) In case such FAC Fund is yet to be generated or such generated fund is not sufficient to adjust against FAC computed for given month, then Distribution Licensee can levy such amount to the consumers through FAC mechanism.

In order to maintain transparency in management and use of such FAC Fund, the Distribution Licensee shall maintain monthly account of such FAC fund and upload it on its website for information of stakeholders. Further, till date, the Distribution Licensees have been levying FAC up to the prescribed limit of 20% of variable component of tariff without prior approval in accordance with the MYT Regulations, 2015, and submitting the FAC computations on a quarterly basis within 60 days of the close of each quarter, for post facto approval. However, as the Commission has created a FAC fund as stated above to address the increase in fuel prices and power purchase costs, the Commission has modified the FAC mechanism such that the Distribution Licensees shall submit the FAC computations on a monthly basis for prior approval, irrespective of whether FAC is chargeable in a month or whether some amount is accruing to the Fund on account of negative FAC. This will ensure that the FAC mechanism is implemented with the changes as desired by the Commission, and the consumers are not levied FAC without prior approval.

The details of the FAC as per the Regulations, shall be submitted by the 15th of the every month prior to the month in which the FAC is proposed to be levied and the Commission will endeavour to decide on the same within 10 days so that the same can be levied from the 1st of the subsequent month. This prior approval will facilitate the addressing of any difficulties that may arise in giving effect to this fund. All the details will be submitted by the Distribution Licensee as is being done for approval of FAC on post facto basis. Thus, the FAC to the consumers shall now be levied with prior approval of the Commission”

- 2.3 Vide its letter dated 20 April, 2020, the Commission communicated the excel formats along with the checklist to file FAC submissions for prior approval to all Distribution Licensees. The Commission also directed all Distribution Licensees to file FAC submissions by 15th of every month prior to the month for which the FAC is proposed to be levied for prior approval.

2.4 Accordingly, TPC-D has filed FAC submissions for the month of June, 2020 for prior approval. The Commission has scrutinized the submissions provided by TPC-D and has also verified the fuel and power purchase bills provided along with its submissions.

3. Energy Sales of the Licensee

3.1 The net energy sales within licence area as submitted by TPC-D in the FAC submission and as approved by the Commission are as shown in the table below:

Consumer Category	Approved by the Commission*	Monthly Approved*	Actual Sales*
	(MU)	(MU)	June 2020 (MU)
	(I)	(II=I/12)	(III)
EHV – Industry	214.59	17.88	9.29
HT I - Industry	827.54	68.96	46.44
EHV- Commercial	106.22	8.85	6.33
HT II - Commercial	401.22	33.44	19.86
HT III - Group Housing Society (Residential)	6.77	0.56	1.07
HT IV – Railways/Metro/Monorail			
-22/33 kV	69.06	5.76	3.31
HT V - Public Services			
a) Govt. Edu. Inst. & Hospitals	13.19	1.10	1.88
b) Others	210.87	17.57	13.89
LT I (A)- Residential (BPL)	0.00	0.00	0.00
LT I (B)- Residential	1884.51	157.04	210.41
LT II - LT Commercial			
(A)- upto 20 kW	228.21	19.02	2.45
(B) >20 kW and <50 kW	112.21	9.35	2.09
(C) - 50 kW	345.66	28.81	10.03
LT III (A) - Industry < 20 kW	32.98	2.75	0.34
LT III (B) - Industry > 20 kW	195.88	16.32	8.62
LT IV - Public Services			
a) Govt. Edu. Inst. & Hospitals	23.37	1.95	0.20
b) Others	6.06	0.50	0.62
LT V - EV Charging Stations	0.10	0.01	0.00
Total	4678.46	389.87	#336.81

* - Approved and Actual Sales includes the direct sales and changeover sales of TPC-D

The sales for April and May 2020 were ~ 255 Mus and 256 Mus respectively (average billing). The sales have increased in June as some consumers have been issued bills after reading the meters.

3.2 Due to spread of Covid-19 pandemic, the Commission had issued Practice Directions on 26 March, 2020 providing certain relaxations in the Supply Code to all the Distribution Licensees in respect of Meter Reading etc. It is observed that the total sales for June,

2020 is 336.81 MUs. The major variation was observed across all categories in view of lower demand on account of lockdown due to Covid-19 pandemic. In response to data gaps in respect of increase in LT Residential sales, TPC-D submitted that AMR is not in place for most of the LT-Residential consumers and accordingly billing for these consumers was done on estimated basis. Meter reading activities for some of the consumers have been resumed in the month of June, 2020 and hence, incremental sales as per actual meter reading for previous period have been billed in the month of June, 2020. Accordingly, there is increase in LT Residential sales as compared to approved for the month of June 2020. The Commission notes the submission of TPC-D.

4. **Power Purchase Details**

4.1 The Commission has approved following sources in the Tariff Order for power purchase by TPC-D.

- a) Tata Power Company Ltd. (TPC-G)
- b) Renewable Energy (Solar and Non-Solar)
- c) Short Term Sources (Bilateral and Power Exchange).

In addition to the aforesaid, there may be some variation in real time (unscheduled interchange) which will be settled through Balancing and Settlement Mechanism approved by the Commission.

4.1 Summary of Power Purchase for TPC-D is as follows:

Sr. No.	Particular	Compliance
1	Sources of approved Power Purchase	TPC-D has purchased power from approved sources.
2	Merit Order Dispatch	TPC-D has followed merit order for scheduling of power and preference was given to cheapest power.
3	Fuel Utilization Plan	Usage of coal is as per Fuel Utilisation Plan approved in TPC-G Order.
4	Pool Imbalance	TPC-D has drawn 20.57 MUs from the imbalance pool to meet the demand.
5	Sale of Surplus Power	TPC-D has sold 0.33 MUs at Rs.4.89/kWh thereby benefitting its consumers as sale rate is higher than APPC. (<i>para. 5.29 below</i>)
6	Power Purchase	Actual Power Purchase is 364.58 MUs as against approved 405.09 MUs due to lower sales.

4.2 The following table show the variation in average power purchase cost (Rs/kWh) for the month of June, 2020 submitted by TPC-D as compared to average power purchase cost approved in Tariff Order:

Particulars	Tariff Order Dated 30.03.2020 FY 2020-21 Approved				Actual for June, 2020 as submitted by TPC-D		
	Net Purchase - Yearly	Net Purchase - Monthly*	Cost - Yearly	Average Power Purchase Cost	Net Purchase	Cost	Average Power Purchase Cost
	MU	MU	Rs. Crore	Rs/kWh	MU	Rs. Crore	Rs/kWh
TPC-G	3,799.84	316.65	1,656.33	4.36	243.56	100.56	4.13
RE Sources	373.85	31.15	246.46	6.59	34.45	19.12	5.55
Short Term	687.31	57.28	244.57	3.56	66.33	17.00	2.56
Unscheduled Interchange	-	-	-	-	20.57	7.20	3.50
Sale of Power	-	-	-	-	(0.33)	(0.16)	4.89
Total	4,861.01	405.08	2,147.36	4.42	364.58	143.72	3.94

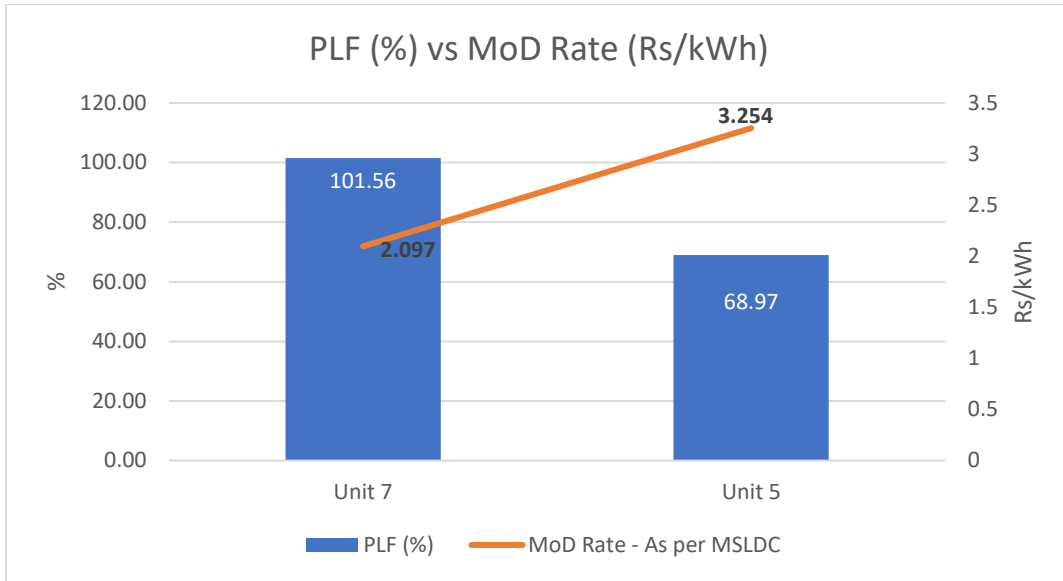
* Although, power purchase quantum is not approved on monthly basis, the monthly quantum is arrived at based on yearly approved quantum and shown for comparison purpose only

5. Power Purchase Cost

5.1 The Commission has sought detailed bills/invoices for all of the power purchase sources in order to verify the claim of TPC-D with regards to average power purchase cost for the month of June, 2020. The Commission has verified the Net Purchase, Variable Cost, Fixed Charge and the Power Purchase Cost from the relevant bills/invoices received for all purchasing sources. TPC-D has purchased power from approved sources as per the Tariff Order.

TPC-G

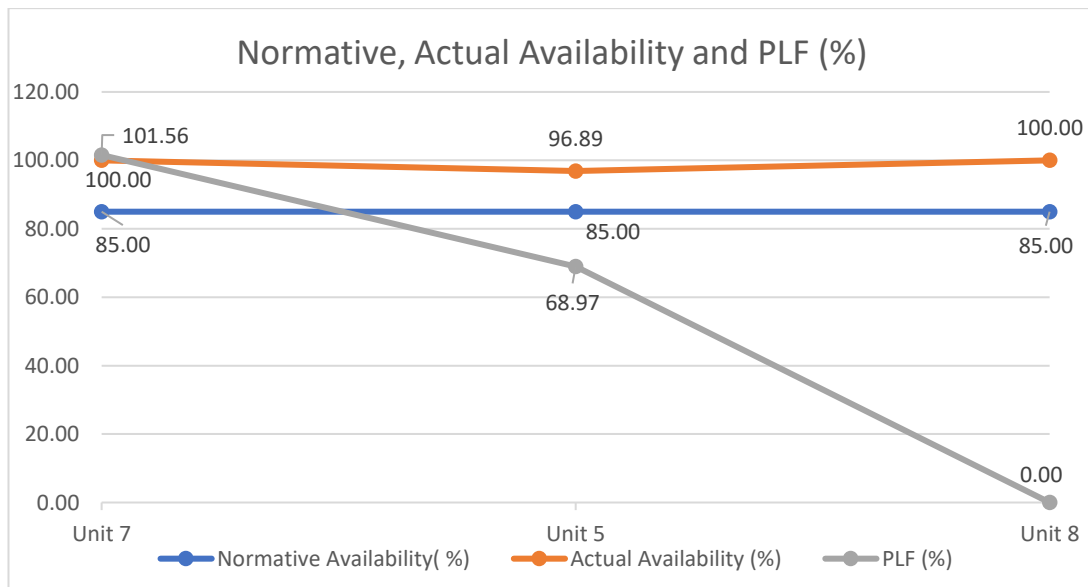
5.2 In view of lower demand due to Covid 19 pandemic, TPC-G Unit-8 having highest rate under MOD was under Zero Schedule, whereas Unit-5 was running at technical minimum. It was observed that Unit-7 having lowest rate in MOD has highest PLF. The graph showing the comparison of Variable Cost in MoD Stack and monthly PLF for TPC-G thermal/gas units is given below:



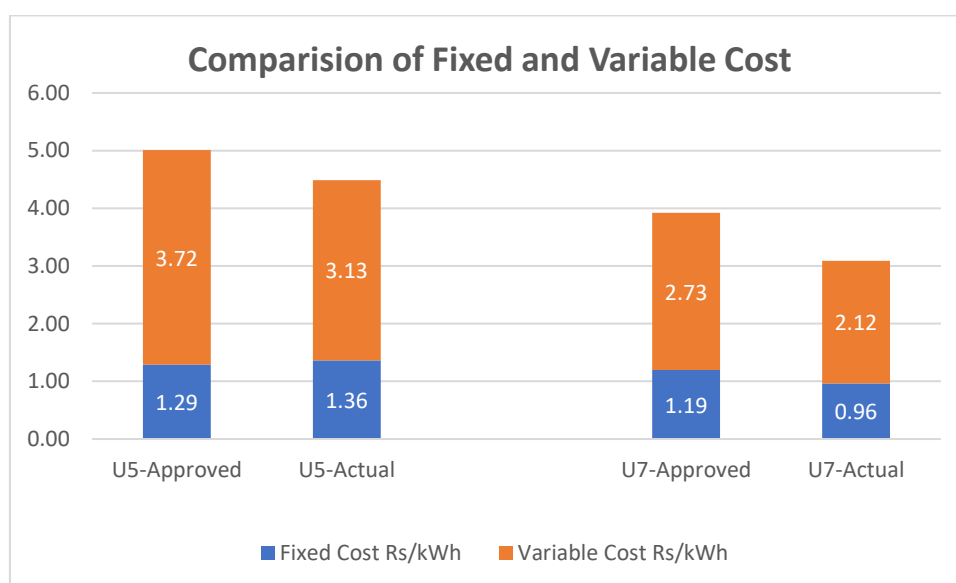
Note: Unit 8 is not considered in aforesaid graph as it was under Zero Schedule for entire month.

5.3 The Commission has observed that TPC-D has purchased 243.56 MUs from TPC-G. The total overall generation was lower during the month leading to low overall PLF mainly due to lower system demand. It was observed that Unit-7 having lowest rate in MOD has run at PLF of 101.5% thereby benefitting the consumers. Unit-7 is having Gas Turbine Generator (GTG) of 120 MW and Steam Turbine Generator (STG) of 60 MW capacity and based on operating conditions like condenser vacuum & other steam parameter, STG can run on more than 100% Plant Load Factor (PLF). Hence, in the combined cycle mode Unit-7 has generated 101.5% due to higher STG generation.

5.4 All the Units of TPC-G were available during the given period, above normative availability. The graphical comparison of normative availability and actual availability for the month of June 2020 is as given below:



5.5 Even though the PLF for the Unit-5 was lower and Unit-8 was under Zero Schedule for the aforesaid month, the entire monthly fixed cost was payable in line with MYT Regulations, 2019 as the cumulative plant availability was higher than the normative availability of 85%. This has resulted into fixed cost being spread over lower net generation. However, the impact of increase in fixed cost for Unit-5 is offset by lowering variable cost due to reduced purchases. Further, in view of better PLF for Unit-7, the fixed cost per unit has decreased. The comparison of Actual and Approved Fixed and Variable Cost of Units 5 and 7 as shown in the graph below shows the impact of fixed cost due to actual generation.



Note: Unit 8 is not considered in aforesaid graph as it was under Zero Schedule for entire month. Fixed Cost payable was Rs.11.74 Crore

5.6 Further, the Commission has verified that the payment of Fixed Charges for all the Thermal/Gas Units as well as Hydro Units have been worked out based on the cumulative availability as per the provisions of MYT Regulations, 2019.

5.7 The Commission in its Order dated 30 March, 2020 in Case No 300 of 2019 in respect of Fuel Utilisation Plan of TPC-G as held as follows:

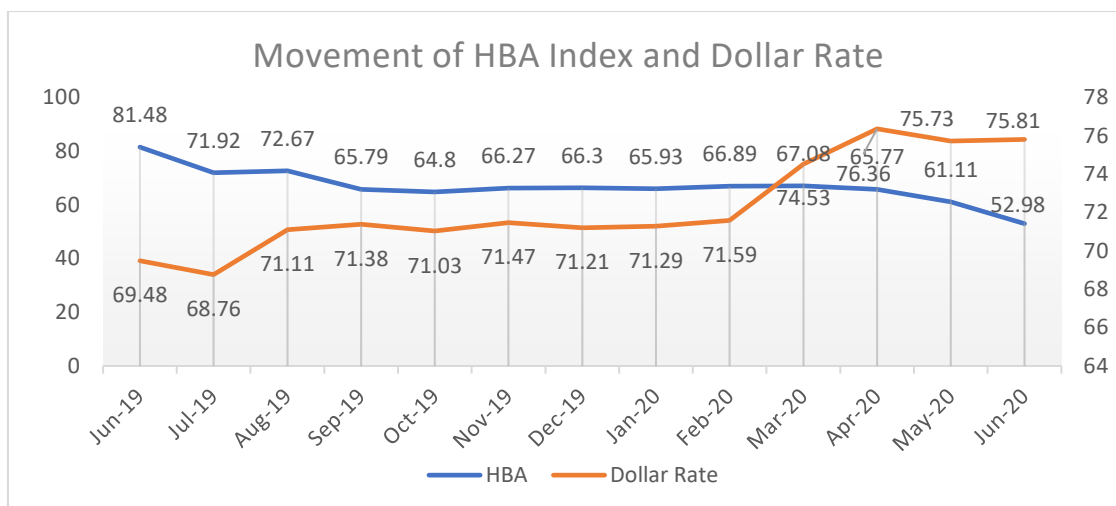
“7.17.7 Regarding the imported coal, it is submitted that Thermal Generating Station at Trombay needs ultra-low sulphur, low ash and Mid GCV coal to adhere with the stringent environment norms. Since, PPAs were not finalised during the year 2019 and there was uncertainty with respect to future tie-ups, the coal tie-ups were done only for a period of one year. The long term contract with Adaro is valid till 2020. Also, annual contract with Kideco and with Avra are valid upto July 31, 2020.

7.17.8 Regarding further fuel arrangement, the Commission notes the TPC-G’s submission that, existing PPAs are valid till March 31, 2024 and hence, it is exploring

the options to tie up Coal on annual basis or on term basis, to get competitive prices for the required quantity in the best interest of consumers.

7.17.9 As regards Gas Contract, the Commission notes that existing APM gas Contract with GAIL is valid upto December 31, 2020. TPC-G submitted that it will be approaching GAIL for renewal of the contracts for further period as per usual practice.”

- 5.8 The Commission notes that from the fuel invoices submitted by TPC-D, coal has been utilised from the contracts approved in the TPC-G's Tariff Order. Further, it has also submitted that they have initiated the competitive bidding process for coal purchase and will conclude the same before expiry of existing contracts.
- 5.9 The Commission has also verified that the usage of coal is as per Fuel Utilisation Plan approved in the Tariff Order resulting in the economic despatch of generation thereby benefitting the consumers.
- 5.10 The APPC for TPC-G, which generates power on Imported Coal, Domestic Natural Gas (under APM mechanism), Oil (LSHS), imported RLNG and hydro has been worked out at Rs. 4.13/ kWh as against the approved rate of Rs. 4.36/kWh.
- 5.11 The variation in APPC is mainly on account of fixed charge payment as explained in paragraph above and also due to lower price of fuel for June 2020. The landed cost of coal for energy charge computation as claimed by TPC-G is Rs. 5694.74/MT as compared to approved rate of Rs. 6705.91/MT. It can be seen that the actual landed price is lower as compared to approved rate in the Tariff Order and the same is due to decrease in the imported coal price primarily attributed to demand supply position of the global coal market. It is also observed that there is reduction in price of APM Gas to Rs. 13,323.97/SCM as compared to approved rate of Rs.17,139.56/SCM.
- 5.12 TPC-G mainly procures imported coal from Indonesian market. As per the Contract, the coal reference price is HBA index i.e., Harga Batubara Acuan for Indonesian coal which is set by Ministry of Energy and Mineral Resources (Indonesia). The Commission has sought for prevailing HBA index during the aforesaid period along with the detailed computation of FOB price at which the coal has been procured by TPC-G. The graph below shows the trend of HBA index which is considered by TPC-G for energy charge calculations. It can be observed that the HBA index has witnessed a downward trend from June 2019 to June 2020 and in the range of around 52.98 to 81.48 which has resulted in lower imported coal price procured in May/June 2020. However, the Dollar Exchange rate has witnessed a sharp surge from February 2020.



* - HBA indices at 6,322 kcal/kg GAR coal with 8% total moisture, 15% ash as received and 0.8% sulphur

\$ - Dollar Rate source - www.x-rates.com (Average rate for the month for representation purpose and may not be a reference rate at which Coal is procured)

5.13 The Commission has also sought for coal purchase bills considered for June 2020. The Commission has scrutinised the bills submitted and computed the purchase price of coal for the month of June 2020 as shown in Table below:

Date	Invoice QTY	GCV	HBA	Correction as per FSA	Invoice Rate	Coal Cost	Freight Rate	BF Correction	Freight Payable	Total Coal Cost	
	MT	kcal/kg	\$/MT	\$/MT	\$/MT	\$	\$/MT	\$/MT	\$	\$	\$/MT
a	b	c	D	e	f	g	h	I	j	k	l
10-05-2020	51600	4756	61.11	17.92	43.19	2228604	12.07	3.00	468012	2696616	52.26
05-06-2020	51343	4922	52.98	11.84	41.14	2112251	12.07	2.50	491353	2603604	50.71
Total	102943	4839	57.06	14.89	42.17	4340855	12.07	2.75	959365	5300220	51.49

5.14 TPC-D has submitted the detailed coal computation for the coal purchased in June 2020 and also the reconciliation of coal cost considered in Form F12 along with each coal invoice. The coal cost is arrived on the basis of Goods Receipt Note (GRN) in the SAP system which is dependent on the rate of coal purchase (in Rs./MT or USD/MT) considered at the time of coal order (PO) booking. However, the coal cost mentioned in the coal invoice is as per the base price of coal purchase (in Rs./MT or USD/MT) arrived on the basis of actual gross calorific value, Moisture content, Ash content, Sulphur content, HBA indices etc. Once the invoice is booked in the SAP system after GRN of full coal quantity of a shipment, the cost as per coal invoice gets booked against each shipment in the SAP system in order to make payment to the supplier. To facilitate this, the difference between coal cost in Goods Receipt Note (GRN) and coal cost in the invoice is booked as adjustment entry in the SAP. Hence, the coal inventory gets valued ultimately at the invoice values and at the coal purchase rate (in Rs./MT or USD/MT) prevailing on the date of billing.

5.15 The Commission while approving the FAC for the month of May, 2020 has disallowed Rs. 3.8 Crore provisionally considered by TPC-D in the absence of invoice towards dredging expense. TPC-D was directed to claim the expense as and when invoice is raised and payment is made by TPC-D. In view of the aforesaid disallowance, the cost of coal purchased during the month of May 2020 reduced leading to change in Coal Consumption Cost during the month as well cost of closing coal inventory. TPC-D in its submission for the month of June 2020 has not considered the revised cost of closing coal inventory approved for the May 2020. On scrutiny of invoices related to Fuel Handling Charge, it is noted that TPC-D has submitted the invoice towards dredging expense and claimed the balance amount by adjusting the provisional amount of Rs 3.8 Crore. However, the Commission having disallowed the provisional dredging expense in May 2020, has considered the actual expense of Rs 5.92 Crore as per invoice submitted by TPC-D for computing the cost of coal purchased during the month of June 2020. Accordingly, considering the approved cost of coal inventory for the month of May 2020 (which is opening coal inventory for June 2020) and dredging expense, which is part of Fuel Handling Charge, the coal cost approved for the month of June 2020 is as given in table below:

Fuel	Opening inventory actual			Purchase during the month			Consumption during the month			Closing inventory actual		
	Quantity	Cost	Price	Quantity	Cost	Price	Quantity	Cost	Price	Quantity	Cost	Price
	MT	Rs.	Rs./MT	MT	Rs.	Rs./MT	MT	Rs.	Rs./MT	MT	Rs.	Rs./MT
As Submitted - Coal	2,37,283	1,42,06,99,183	5,987	52,127	32,52,63,869	6,240	1,06,561	64,28,62,826	6,033	1,82,850	1,10,31,00,226	6,033
As Approved- Coal	2,37,283	1,39,29,42,080	5,870	52,127	36,32,63,869	6,969	1,06,561	64,66,34,248	6,068	1,82,850	1,10,95,71,701	6,068

5.16 TPC is directed to consider the aforesaid approved coal cost while computing the FAC for the month of July 2020.

5.17 Further, as the coal purchase during a month is generally not utilised in the same month, hence, there is a variation in above computed coal price vis-à-vis coal price as considered by TPC-G for energy charge calculations. The cost of coal for energy charge computation pertains to coal consumed during the respective months which is arrived based on the actual cost of coal inventory as well as the purchased coal cost received in the coal yard.

5.18 Apart from above, the Commission has also sought for third party sampling report for GCV verifications. TPC-G has submitted the third party sampling certificate for the respective period. The Commission has verified the document submitted and found to be in order.

5.19 From the Table above in Para 5.13, the basic purchase cost of imported coal including freight during the month of June 2020 as per sample bills submitted worked out at USD 51.49/MT. TPC-D has booked Rs. 3,904.40/MT (i.e. Rs. 3155.80/MT for Coal and Rs. 748.60/MT for freight) resulting in conversion rate of Rs. 75.83 per dollar. Also, other coal handling charges such as insurance, handling and wharfage charges, taxes and duties, clean energy cess and other miscellaneous charges considered by TPC-D are in line with the average prices approved in the previous quarters and accordingly, the total landed

cost of coal arrived is Rs. 6,239.84/MT. As mentioned above, the Commission has considered actual Dredging Expenses of Rs 5.92 Crore as per invoice submitted by PC-D. Considering the impact of the said amount, the total landed cost of coal arrived has increased to Rs. 6,968.83/MT. Accordingly, the break-up of the cost as submitted by TPC-D and as approved by Commission against the procurement of coal for the month of June 2020 is as given below:

Sr. No	Particular	Source / Formula	units	As Submitted – Coal Cost	As Approved – Coal Cost
1	Coal cost including Freight	As computed above	USD \$/MT	51.49	51.49
2	Dollar exchange rate	As an average	USD/Rs.	75.83	75.83
3	Basic Coal cost + Freight in Rs.	1 X 2	Rs./MT	3,904.40	3,904.40
4	Excise + Custom Duty + CE Cess+ Insurance	As submitted	Rs./MT	630.95	630.95
5	Handling and Wharfage	As submitted	Rs./MT	592.84	592.84
6	Other Fuel Handling Charges	As submitted	Rs./MT	1,129.59	1,858.58*
7	Other Adjustment	As submitted	Rs./MT	(17.94)	(17.94)
8	Total as per Form 12	Sum(3:7)	Rs./MT	6,239.84	6,968.83

* - inclusion of Dredging cost disallowed earlier and approved for the month of June as per invoice

5.20 It is observed that there is difference in coal cost considered in Form 11 and Form 12. TPC-D submitted that the difference in the cost is due to Foreign exchange variation due to difference in dollar rate at the time of booking of Purchase Order and the actual payment made to vendor and the employee cost. Accordingly, considering the revised coal cost approved by the Commission, the coal consumption cost to be considered as per Form 11 is as given below:

Particulars	Units	TPC Submission	As Approved
Form F12 - Coal Consumption Cost	Rs/MT	6,032.83	6,068.22
Foreign Exchange Rate Variation	Rs/MT	-412.34	-412.34
Employee Cost	Rs/MT	74.25	74.25
Form F11 - Coal Consumption Cost	Rs/MT	5694.74	5730.13

5.21 In view of the above, the Commission has considered APPC of Rs 4.14/kWh as against approved rate of Rs. 4.36/kWh for power purchased from TPC-G.

Renewable Sources

5.22 TPC-D has tied up non-solar generation (Wind) of 158 MW and 28.06 MW of solar to meet its Renewable Purchase Obligation. The Commission in the Tariff Order has approved the said purchase for non-solar and solar energy at average rate of Rs. 4.98/kWh

and Rs. 9.10/kWh respectively. Further, the Commission has also approved non-solar and solar REC's at Floor Price of Rs.1.00/kWh for approximately 391 MUs towards shortfall in meeting RPO.

5.23 TPC-D had purchased non-Solar (30.83 MUs) and Solar RE (3.62 MUs) power as per the long term PPAs with Wind and Solar generators. TPC-D has submitted invoices for solar energy purchase and the solar purchase considered is as per invoice submitted by TPC-D and the same is considered by the Commission in FAC computation. In respect of non-solar, it has submitted that TPC-D is yet to receive credit notes (invoices) for the wind power procured from various generators during June, 2020 and accordingly wind power purchase has been considered based on the monthly meter reading data. In view of the purchase of non-solar energy being from an approved source as per Tariff Order, the Commission has considered the non-solar energy as submitted by TPC-D. However, TPC-D is directed to submit the invoices of non-solar wind energy purchase during the FAC submission of next month for verification. TPC-D has also purchased 2865 REC's at Rs 1/kWh at the floor price approved by the Commission in the Tariff Order and has accordingly considered the cost of Rs 0.29 Crore towards REC.

5.24 The Commission observes that TPC-D has purchased total 34.45 MUs of RE power during the month of June, 2020. This power has been purchased by TPC-D as per Generic Tariff rate approved by the Commission. The average power purchase cost from RE sources including REC is Rs. 5.55/kWh as compared to approved rate of Rs. 6.59/kWh. Accordingly, the Commission has considered RE purchase as submitted by TPC-D.

Short Term Purchase

5.25 With regards to short term purchase, TPC-D has purchased 66.33 MUs at average rate of Rs. 2.56/kWh as compared to approved rate of Rs. 3.56/kWh. It was observed that in spite of availability of contracted sources, TPC-D purchased power from Power Exchange at lower rate to optimise its overall power purchase cost. Accordingly, the Commission has considered the power purchased from Power Exchange by TPC-D.

5.26 To summarise, TPC-D has optimised its overall power purchase cost by taking following actions:

- (a) Zero Schedule to Unit 8 (highest cost in MOD) under Zero Schedule for entire month.
- (b) Running Unit 5 at Technical Minimum for entire month (2nd in MOD)
- (c) Lowest Cost Generator – Unit 7 is run at highest PLF among all the thermal/gas generators
- (d) Purchasing cheaper power from Power Exchange at Rs 2.56/kWh which is lower than Variable Cost of Unit 5 and Unit 8.

Imbalance Pool

- 5.27 It was observed that TPC-D has drawn 20.57 MUs from the imbalance pool during the month of June 2020. The said drawl from the pool may be on account of either increase in demand of consumers than estimated by the Licensee or due to lower generation than scheduled by the generator. In both the scenarios, power has been drawn by the Licensee and supplied to its consumers. The said power supplied to the consumers is already billed as per Tariff approved by the Commission. The Energy Charge approved also includes the element of power purchase. It is therefore pertinent that such cost of such power drawn from the pool is considered while computing FAC.
- 5.28 Due to historical issues of delay in computing imbalance pool quantum and cost of power, for which appropriate orders are already passed by the Commission, the imbalance pool quantum and cost is required to be considered on provisional basis to avoid any adverse impact in future. If the said cost and quantum is not considered, it will not only result in recovering the cost from the consumers as billing has already been done, but also increase the overall power purchase cost for the particular month having positive impact on FAC and burdening the consumers. Also, as and when the final bills are issued by MSDLC, the power purchase cost of the imbalance pool quantum will be levied in future months, thereby burdening the consumers in future in that month when such cost will be levied. Accordingly, to balance the overall interest of consumers and licensee, the Commission has considered imbalance pool quantum as submitted by TPC-D at provisional rate of Rs. 2.86/kWh as considered in the MYT Order. This provisional consideration of cost for FAC computation will get adjusted during truing-up of the respective year.

Sale of Power

- 5.29 TPC-D has done sale of surplus power to the extent of 0.33 MUs during the month at Rs. 4.89/kWh. With such a sale of power TPC-D has earned revenue of Rs. 0.16 Crore. The Commission has compared the rate of sale of surplus power by TPC-D vis-à-vis the Market Clearing Price (MCP) prices of power traded at IEX. The average MCP prices for June 2020 prevailed at Rs. 2.35/kWh at Regional periphery which would be approximately Rs. 2.75/kWh at Maharashtra Periphery. Against the above prices prevailing at IEX, TPC-D has managed to sold the surplus power at a higher rate, thus lowering the APPC and benefitting the consumers. Hence, based on this the Commission has considered the actual quantum and revenue against surplus sale.

Approved Cost of Power Purchase

- 5.30 In view of the above, the overall cost approved in the Tariff Order and actual for the month of June, 2020 considered by the Commission is as shown below:

Particulars	Source	Power Purchase Quantum (MU)	Fixed Cost (Rs. Crore)	Fixed Cost (Rs./kWh)	Variable Cost (Rs. Crore)	Variable Cost (Rs./kWh)	Total Cost (Rs. Crore)	APPC (Rs./kWh)
TPC-G	Approved	316.65	39.26	1.24	98.77	3.12	138.03	4.36
	Actual	243.56	41.46	1.70	59.27	2.43	100.73	4.14
Renewable including REC	Approved	31.15	-	-	20.54	6.59	20.54	6.59
	Actual	34.45		-	19.12	5.55	19.12	5.55
Short Term	Approved	57.28	-	-	20.38	3.56	20.38	3.56
	Actual	66.33		-	17.00	2.56	17.00	2.56
Imbalance Pool	Approved	-	-	-	-	-	-	-
	Actual	20.57			5.88	2.86	5.88	2.86
Sale of Surplus Power	Approved	-	-	-	-	-	-	-
	Actual	(0.33)		-	(-0.16)	4.89	(0.16)	(4.89)
Total	Approved	405.08	39.26	0.97	139.69	3.45	178.95	4.42
	Actual	364.58	41.46	1.14	101.12	2.77	142.58	3.91

5.31 Considering the above, the Commission allows the average power purchase cost of Rs.3.91/kWh for the month of June, 2020 as shown in Table above. The variation in power purchase cost is mainly on account of lower cost of power purchase from TPC-G and short term purchase, as already explained in para above.

6. FAC on account of fuel and power purchase cost (F)

6.1 The Commission has worked out the average power purchase cost for the month of June, 2020 as shown in above table. The same has been compared with the average power purchase cost approved by the Commission in Tariff Order dated 30 March, 2020 and accordingly arrived at differential per unit rate at which Z_{FAC} is to be passed on to the consumers.

6.2 The following table shows the Z_{FAC} worked out by the Commission on account of difference in fuel and power purchase cost for the month of June, 2020.

S. No.	Particulars	Units	June 2020
1	Average power purchase cost approved by the Commission	Rs./kWh	4.42
2	Actual average power purchase cost	Rs./kWh	3.91
3	Change in average power purchase cost (=2 -1)	Rs./kWh	(0.51)
4	Net Power Purchase	MU	364.58
5	Change in fuel and power purchase cost (=3 x 4/10)	Rs. Crore	(18.47)

7. Adjustment for over recovery/under recovery (B)

7.1 The adjustment for over recovery/under recovery has to be done for the (n-4) month as per provisions of MYT Regulations, 2019. As the prior approval of FAC has started from April 2020, there would not be any adjustment factor for months prior to April 2020 while computing the allowable FAC.

8. Carrying Cost for over recovery/under recovery (B)

8.1 As explained in the above paragraph in absence of any adjustment factor for previous month, there is no carrying cost which is to be allowed in FAC for the month of June, 2020.

9. Disallowance due to excess Distribution Loss

9.1 Regulation 10.8 of MYT Regulations, 2019 provides for FAC amount to be reduced in case the actual distribution loss for the month exceeds the approved distribution loss. The relevant extract is reproduced as follows.

“10.8 The total Z_{FAC} recoverable as per the formula specified above shall be recovered from the actual sales in terms of “Rupees per kilowatt-hour”:

Provided that, in case of unmetered consumers, the Z_{FAC} shall be recoverable based on estimated sales to such consumers, computed in accordance with such methodology as may be stipulated by the Commission:

Provided further that, where the actual annual sliding distribution losses of the Distribution Licensee exceed the level approved by the Commission, the amount of Z_{FAC} corresponding to the excess distribution losses (in kWh terms) shall be deducted from the total Z_{FAC} recoverable”

9.2 The following table provides the comparison of approved and actual distribution loss and disallowance due to excess distribution loss if any.

S. N	Particulars	Units	Approved in Tariff Order	June 2020- Actual	Actual upto June 2020
1	Net Energy Input at Distribution Voltage	MU	3242.49	175.25	488.22
2	TPC-D Retail Sales (excluding sales at 110/132 kV level)	MU	3209.42	178.51	455.55
3	Distribution Loss (1 - 2)	MU	33.07	(3.26)	32.66
4	Distribution Loss as % of net energy input (3/1)	%	1.02%	-1.86%	6.69%
5	Excess Distribution Loss = [Actual Distribution Loss (4) -	MU	-	(5.05)	27.69

S. N	Particulars	Units	Approved in Tariff Order	June 2020- Actual	Actual upto June 2020
	Distribution loss approved] x Net Energy Input (1)				
6	Disallowance of FAC due to excess Distribution Loss	Rs. Crore	-	-	-

9.3 It is seen that standalone distribution loss for the month of June 2020 is negative. In response to query raised by the Commission, TPC-D submitted that the meter reading activities for distribution consumers were restricted in the month of April, 2020 and May, 2020 due to lockdown on account of Covid-19 pandemic. Meter reading activities have been resumed in the month of June, 2020. The estimated consumption for the month of April, 2020 and May, 2020 has been billed for some of the consumers in the month of June, 2020. Hence, the distribution sales for the month of June, 2020 are higher than the input energy at distribution level, resulting in negative distribution loss for the month of June, 2020. The Commission notes the submission of TPC-D. However, as seen from the above table, cumulative Distribution Loss upto the month of June, 2020 is 6.69% which is higher than the approved Distribution Loss of 1.2% mainly due to estimated sales due to Covid-19 pandemic. The Commission has not worked out any disallowance on account of excess Distribution Loss since the standalone FAC for the month of June, 2020 is negative.

10. Summary of Allowable Z_{FAC}

10.1 The summary of the FAC amount as approved by the Commission for the month of June, 2020 is as shown in the Table below.

S. No.	Particulars	Units	June 2020 - As per TPC	June 2020 – As Approved
1.0	Calculation of Z_{FAC}			
1.1	Change in cost of generation and power purchase attributable to Sales within the License Area (F)	Rs. Crore	(17.33)	(18.47)
1.2	Carrying cost for over-recovery/under-recovery (C)	Rs. Crore	0.00	0.00
1.3	Adjustment factor for over-recovery/under-recovery (B)	Rs. Crore	(0.04)	0.00
1.4	Z_{FAC} = F+C+B	Rs. Crore	(17.36)	(18.47)
2.0	Calculation of Per Unit FAC			
2.1	Energy Sales within the License Area	MU	336.81	336.81
2.2	Excess Distribution Loss	MU	0.00	0.00
2.3	Z _{FAC} per kWh	Rs./kWh	0.00	0.00
3.0	Allowable FAC			
3.1	FAC disallowed corresponding to excess Distribution Loss [(2.2 x 2.3)/10]	Rs. Crore	0.00	0.00
3.2	FAC allowable [1.4-3.1]	Rs. Crore	(17.36)	(18.47)
4.0	Utilization of FAC Fund			
4.1	Opening Balance of FAC Fund	Rs. Crore	(22.12)	(22.12)
4.2	Holding Cost on FAC Fund	Rs. Crore	0.16	0.16*
4.3	Z _{FAC} for the month (Sr. N. 3.2)	Rs. Crore	(17.36)	(18.47)
4.4	Closing Balance of FAC Fund	Rs. Crore	(39.64)	(40.74)
4.5	Z _{FAC} leviable/refundable to consumer	Rs. Crore	0.00	0.00
5.0	Total FAC based on category wise and slab wise allowed to be recovered in the billing month of Jun-20	Rs. Crore	0.00	0.00
6.0	Carried forward FAC for recovery during future period (4.5-5.0)	Rs. Crore	0.00	0.00

* - TPC-D has computed holding cost on opening balance which also included interest component for the month of May 2020 whereas it is recomputed by the Commission considering simple interest as per Regulations.

10.2 It can be seen from the above table that standalone FAC for the month of June, 2020 is Rs. (18.47) Crore. As the FAC is negative, the said amount will be accumulated in FAC Fund for stabilisation of FAC rate over the period.

11. Recovery from Consumers:

11.1 Regulation 10.9 of MYT Regulations, 2019 provides for methodology of recovery of FAC charge from each category of consumers. The relevant extract is reproduced as below.

“10.9 The ZFAC per kWh for a particular Tariff category/sub-category/consumption slab shall be computed as per the following formula: —

$Z_{FAC\ Cat} (Rs/kWh) = [Z_{FAC} / (Metered\ sales + Unmetered\ consumption\ estimates + Excess\ distribution\ losses)] * k * 10,$

Where:

$Z_{FAC\ Cat} = Z_{FAC}$ component for a particular Tariff category/sub-category/consumption slab in ‘Rupees per kWh’ terms;

$k = Average\ Billing\ Rate / ACOS;$

Average Billing Rate = Average Billing Rate for a particular Tariff category/sub-category/consumption slab under consideration in ‘Rupees per kWh’ as approved by the Commission in the Tariff Order:

Provided that the Average Billing Rate for the unmetered consumers shall be based on the estimated sales to such consumers, computed in accordance with such methodology as may be stipulated by the Commission:

$ACOS = Average\ Cost\ of\ Supply$ in ‘Rupees per kWh’ as approved for recovery by the Commission in the Tariff Order:

Provided that the monthly Z_{FAC} shall not exceed 20% of the variable component of Tariff or such other ceiling as may be stipulated by the Commission from time to time:

Provided further that any under-recovery in the Z_{FAC} on account of such ceiling shall be carried forward and shall be recovered by the Distribution Licensee over such future period as may be directed by the Commission....”

- 11.2 The Commission allows the FAC amount of Rs. (18.47) Crore for the month of June, 2020 to be accumulated as FAC Fund and shall be carried forward to the next billing cycle with holding cost.
- 11.3 The Commission in its approval for the month of May, 2020 has directed TPC-D to carry forward the approved FAC amount of Rs. (22.12) Crore to be accumulated as FAC Fund to be carried forward to the next billing cycle with holding cost. The opening balance of FAC fund along with holding cost is Rs. (22.28) Crore.
- 11.4 Accordingly, considering the approved standalone FAC amount of Rs. (18.47) Crore for the month of June, 2020 and opening balance FAC Fund of Rs. (22.28) Crore, the total amount of Rs. (40.74) Crore is being allowed to be accumulated in the FAC Fund and shall be carried forward to the next billing cycle with holding cost.

- 11.5 The Commission in the Tariff Order had held that negative FAC amount shall be carried forward to the next FAC billing cycle with holding cost till the accumulated negative FAC reaches the limit of Rs. 50 Crore.
- 11.6 In view of the above, the per unit Z_{FAC} for the month of June, 2020 to be levied on consumers of TPC-D in the billing month of August 2020 is **Nil**.