



8th February, 2017

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OFFICE OF THE *9/2/17*

CREG/MUM/MERC/2017/32

MAHARASHTRA ELECTRICITY
REGULATORY COMMISSION
WTC, COLABA, MUMBAI - 400 005.

To,
Secretary,
Maharashtra Electricity Regulatory Commission,
13th Floor, Centre No 1, World Trade Centre
Cuffe Parade, Colaba, Mumbai 400 005.

Dear Sir,

Sub: Transmission Licence Amendment Application of Tata Power-T in Case No. 137 of 2016 -

Response to Data Gaps Set 1

- Ref: 1 MYT Order in Case no. 22 of 2016 of Tata Power-T dated 30th June, 2016*
2. Submission of Transmission Licence Amendment Application to Hon'ble
Commission vide letter reference MERC/MUM/2016/267 dated 10th October, 2016
3. Email on Data Gaps Set 1 from Hon'ble Commission on 22nd December, 2016

This has reference to the data gaps raised through the above mentioned email (Ref. 3) with respect to the Transmission Licence Amendment Application of Tata Power-T in Case No. 137 of 2016.

We are in the **Appendix**, enclosing our response to the queries raised.

We trust the same is in order.

Yours faithfully,

Swati Mehendale
8/2/17

Ms. Swati Mehendale
Head Regulatory (Western Region)

Encl: Appendix

TATA POWER

The Tata Power Company Limited

Backbay Receiving Station, Regulation Department 148 Lt Gen J Bhonsale Marg Nariman Point Mumbai - 400 024

Tel 91 22 6717 2903

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**Transmission Licence Amendment Application of Tata Power-T in Case No. 137 of 2016 -
Response to Data Gaps Set 1**

- 1) *110 kV Trombay Dharavi 2 Transmission Line: TPC-T has mentioned that a part of 110 kV Trombay Dharavi 2 Transmission Line has been decommissioned. Please provide the length of the Line decommissioned, date of decommissioning and please clarify whether GFA reduction was proposed by TPC-T in the respective years' Tariff Petition. If yes, please submit the relevant portion of the Petition.*

Please clarify whether the revision in above asset was submitted as a part of MYT Petition in Case No. 22 of 2016. Provide extracts of Petition submission.

Response

With respect to 110 kV Trombay Dharavi 2 Transmission Line, we wish to submit that a length of 7.52 km. of this Line was decapitalised on 30th June, 2015.

With respect to reduction of GFA, it is submitted that in the MYT Petition, Truing up of FY 2015-16 was carried out on a provisional basis, wherein no decapitalisation and consequent reduction of GFA was considered as per practice. Such reduction in GFA on account of decapitalisation of the above mentioned asset shall be part of the total reduction in GFA to be considered during final truing-up of FY 2015-16.

Further, with respect to the revision of asset, we wish to submit that although the asset was decapitalised, new line of same length will be added in the same stretch as part of the Trombay Dharavi Salsette Line project under construction. The net impact will be submitted during the MTR petition.

- 2) *110 kV Dharavi – BKC Transmission Lines: TPC-T has mentioned that as per the scope of DPR approved by the Commission, the length of the line is 6.94 ckt. Km for two lines. The in principle approval of the Commission does not show the approved length as 6.94 ckt.km. STU Plan also does not indicate the length as 6.94 km and indicates the length of line as two Km. Hence, please clarify the position Vis-a vis DPR submitted and whether for revised length, the approval of the Commission was sought. This is particularly considering the O&M expenses are approved based on ckt-km.*

Also, please clarify if the scope of the DPR approved in 2008 included 2 nos. of lines with 6.94 ckt km (as mentioned in the Petition), then at the time of Licence Petition, why only one line with 2 km length was sought to be included in the Licence.

Please clarify whether the revision in above asset was submitted as a part of MYT Petition in Case No. 22 of 2016. Provide extracts of Petition submission.

Response

With respect to the 110 kV Dharavi BKC line 3 & 4, we wish to submit that the establishment of this Line has considered the two existing 110 kV overhead lines of 4.14 ckt. km each from Dharavi Receiving Station to Tower Location 16. This scope was part of DPR submission letter reference dated MERC/CAP/DPR/17/08/965 dated 9th May, 2008 of Tata Power-T. The relevant extract from the DPR is reproduced below:

"Two additional 22 kV feeders from Dharavi R/S are routed on 110 kV transmission line towers and are terminated on H frames within the BKC plot area. These lines are rated for 110 kV. From the H frames, these 22 kV feeders are brought into the switchgear room through 22 kV cables. It is proposed to supply BKC S/S at 110 kV using these existing overhead lines from Dharavi R/S to BKC S/S. These 110 kV lines may be used as incoming to the proposed 145 kV GIS."

...

Hence, the length of ~ 2 km was only towards the additional length required to complete the line. For this portion, underground cable of 2.80 ckt. km was laid for each line from Tower Location 16 to the new BKC Receiving Station. Thus the total length of each of the Dharavi - BKC Transmission Line was sum of the existing Transmission Line of 4.14 Ckt. Km from Dharavi to Tower Location 16 and an underground cable length of 2.80 ckt. Km from Tower Location 16 to BKC Receiving Station making the total length 6.94 ckt. km for each line.

As the addition in length was of only ~ 2 km. the same may have got reflected in the STU Plan.

Further, the above referred paragraph from the DPR also brings out that 2 existing 110 kV lines being used at 22 kV will be used as 110 kV incomers for BKC. However, in the

Transmission Licence petition, only one line was erroneously considered for grant of Licence.

The commissioning of 110 kV Dharavi - BKC Transmission Line 3 and 4 were part of MYT submission in Case No. 22 of 2016 of Tata Power-T.

It may be noted that the 110 kV Dharavi-BKC Transmission Line 4 was commissioned in FY 2014-15. This Line length was included as part of the total Transmission Line length of 34.64 ckt. Km. added during FY 2014-15.

Further, the 110 kV Dharavi-BKC Transmission Line 3 was commissioned in FY 2015-16. This Line length was included as part of the total Transmission Line length added during FY 2015-16.

- 3) *220kV Salsette – Saki and Salsette-Sahar Lines: Please clarify as to why these lines were not sought to be included at the time of Licence Petition In spite of the Commission's approval in way back in 2007 and 2010. Also, copy of the letter dated 18 November, 2013 may be submitted.*

Change in name of Transmission line: Reason for change in name of line no. 32 and 45 shall be furnished with reference to any reconfiguration carried out, if any and corresponding approval and date of reconfiguration. If no reconfiguration has been done, kindly clarify the reason why these names were not proposed at the time of grant of Licence.

Please clarify whether the revision in above asset was submitted as a part of MYT Petition in Case No. 22 of 2016. Provide extracts of Petition submission.

Response

The Hon'ble Commission had granted a Transmission Licence to Tata Power for a period of 25 years in Case No. 112 of 2014 on 14th August, 2014. Further as explained in Transmission Licence Amendment Petition, Tata Power-T has used the existing 220 kV Saki-NIE-Sahar Transmission Line for creation of two new 220 kV Transmission Lines, one from Salsette to Saki Receiving Station and second from Salsette to Sahar Receiving Station. Though the two DPR's for these lines were approved in FY 2007-08 and FY 2009-10 respectively, in actuals these lines were commissioned during March 2016 (220 kV Salsette-Saki Transmission Line) and May 2016 (220 kV Salsette-Sahar Transmission Line) which was post issuance of Transmission Licence. Hence as the two lines were not established at the time of Licence, the 220 kV Saki-NIE-Sahar line continued to be represented in the Transmission Licence.

We are enclosing copy of the letter CREG/MUM/13/239 dated 18th November, 2013 as **Annexure 1** as required in which Tata Power-T had submitted the change of scope in 220 kV Transmission Line from Salsette Receiving Station to Saki Receiving Station.

The commissioning of 220 kV Salsette-Saki Line and 220 kV Salsette Sahar line was included as part of the addition of Line lengths in FY 2015-16 in the MYT petition in Case No. 22 of 2016. However, the 220 kV Salsette Sahar Transmission Line was commissioned in May, 2016. As FY 2015-16 was a provisional true up, the actual line length addition shall be submitted during the final true-up of FY 2015-16 in the MTR Petition.

Change in name of Transmission lines:

Tata Power-T has requested following changes in the names of its Transmission Lines:

Item No. 32 from "110 kV Carnac-Backbay 1 Transmission Line (4.01 km) from Carnac Receiving Station to BEST Backbay Receiving Station" to "110 kV Carnac-BEST-Backbay 1 Transmission Line (4.01 km) from Carnac Receiving Station to Backbay Receiving Station": We wish to inform Hon'ble Commission that there was a major fire incident at BEST Backbay substation on 16th October, 2011. There are 2 Nos. 110 kV lines feeding BEST Backbay from Tata Backbay. Based on N-1 contingency, to provide additional source to BEST Backbay from Tata Carnac R/S, 110 KV Carnac Backbay 1 cable was rerouted from 145 KV GIS at Tata Backbay to 145 KV GIS at BEST Backbay in FY 2014-15. Further as there was no addition to Network Ckt Km, Tata Power-T is requesting the change in the name to reflect the exact route of the cable in its nomenclature for precise identification.

- **Item No. 45** from "110 kV Khopoli- Mankhurd Transmission Line (56.27 km) from Khopoli Generating Station to Mankhurd Receiving Station" to "110 kV Khopoli-Bhokarpada-Mankhurd Transmission Line (56.27 km) from Khopoli Generating Station to Mankhurd Receiving Station":

We wish to inform Hon'ble Commission that as per approved DPR for "Construction of 110/33 kV Substation at IXORA, Panvel", 110 kV Khopoli-Mankhurd transmission line was Looped in loop out (LLO) at Bhokarpada (for providing power supply to Ixora Receiving Station) thus making it a three terminal line between Khopoli, Bhokarpada &

Mankhurd. Further, Tata Power-T is requesting the change in the existing name of a transmission line to reflect the exact route of the line in its nomenclature for precise identification.

- 4) *Ambernath Receiving Station: It is submitted that there are 14 outgoing feeders. However, the SLD shows only 11 feeders. Pl. clarify.*

Please clarify whether the revision in above asset was submitted as a part of MYT Petition in Case No. 22 of 2016. Provide extracts of Petition submission

Response

With respect to Ambernath Receiving Station we wish to submit the following:

In line with our amendment petition, there are 22 nos. 22 kV Bays at Ambernath Receiving Station. We regret the incorrect SLD submitted and have enclosed the correct SLD (Refer **Annexure 2**). Further, we are also showing the correct configuration of the bays in the Table below.

Table 1: 22 kV Bays Configuration at Ambernath Receiving Station

Bay Name	No. of Bays
Incomer Bays	5
Outgoing Feeders	9
Station Transformer Bays	2
Bus PT bays	3
Capacitor Bank Feeder	2
Bus Section Breaker Bay	1
Total 22 kV Bays	22

- 5) *Backbay receiving station: It is submitted in the Petition, that the Commission in DPR approval dated 21 December, 2012, had approved addition of 14 33kV bays. However, the copy of in principle approval letter enclosed as annexure 14 shows only 12 bays. Please clarify.*

Please clarify whether the revision in above asset was submitted as a part of MYT Petition in Case No. 22 of 2016. Provide extracts of Petition submission

Response

With respect to Backbay Receiving Station we wish to submit that the In-principle clearance for Backbay Receiving Station comprises of total 14 bays. The relevant extract of the in-principle clearance is as shown below:

Appendix – A

“ Installation of additional bays at Borivali, Malad & Backbay R/s
(All Price are in rs. Lakhs)

Sr No	Description	UoM	Per unit cost	Backbay		Borivali		Malad	
				Qty	Item Price	Qty	Item Price	Qty	Item Price
1	Civil works for 33kv Installation			1	20	1	20	1	20
2	Procurement of 33kV GIS complete with CTs, Dummy panels disconnections, BCU/BCPU equipment	Rs Lakhs/ bay	43.75	12	525	9	393.75	10	437.5
3	Additional PT's required for Protection and Metering	Rs Lakhs/ bay	1.8	2	3.6	2	3.6	2	3.6

The total no. of 33 kV bays as shown in above in-principle clearance snapshot is 14 bays (12+2). (Refer Annexure 3 for the "In-principle" clearance)

In view of the above, there was no revision as compared to the "In-principle" clearance received.

- 6) BKC receiving station: It is submitted that vide DPR approval dated 9 May, 2008 in principle approval was given for 6 nos. of 110kV bays. Please clarify whether revised in principle approval was obtained for three additional 110 KV bays. Whether the additional cost has been approved by the Commission in any proceeding? As regards to 33kV additional 21 bays also, whether revised in principle approval was obtained for 21 additional 33 KV bays. Whether the additional cost has been approved by the Commission in any proceeding? Please clarify whether the revision in above asset was submitted as a part of MYT Petition in Case No. 22 of 2016. Provide extracts of Petition submission.

Response

Tata Power-T had submitted a Detailed Project Report (DPR) of "145 kV GIS at BKC Sub Station" with a scheme value of Rs. 230.50 Crores for "in-principle" clearance of the Hon'ble Commission on 21st January, 2008. The Hon'ble Commission had granted its "in-principle" clearance to the DPR by their letter MERC/CAP/DPR/17/08/965 dated 9th May, 2008. Subsequent to the "in-principle" clearance, during execution, the cost of the project was estimated to increase from the approved value of Rs. 230.50 Crores to Rs. 285.95 Crores on account of various reasons which were beyond control of Tata Power-T. Considering the cost and time over run, the Hon'ble Commission has made the following observations in the MYT Order of Tata Power-T in Case 22 of 2016 dated 30th June, 2016:

"4.3.18 Based on the above, the cost of land of Rs 116.18 Crore (base land cost: Rs. 95 Crore + IDC: Rs. 21.18) is approved for FY 2014-15, as against TPC-T's claim of Rs. 137.92 Crore (considering a higher IDC of Rs. 42.92 crore). The cost of the scheme pertaining to assets/equipment, including the corresponding IDC, for FY 2014-15 has been approved as Rs 110.75 Crore, as claimed by TPC-T. Thus, the Commission approves capitalization of Rs 226.93 (116.18 + 110.75) crore for FY 2014-15 against this scheme. TPC-T shall submit a revised DPR for approval with reasons for the cost and time over-runs."

In line with the above directive, Tata Power-T has submitted the revised DPR for "145 kV GIS at BKC Receiving Station" with a total revised cost of Rs. 285.95 Crores along with the additional 110 kV and 33 kV bays which were commissioned at BKC Receiving Station vide letter reference REG/MUM/2017/294 dated 7th November, 2016. We are attaching the copy of DPR submission letter as **Annexure 4** to this submission. The "in-principle" approval for the revised DPR is awaited from Hon'ble Commission.

In MYT submission 7 Nos. 110 kV bays & 31 Nos. 33 kV bays were included as part of addition of Bays in FY 2014-15. Two Nos. 110 kV Bus PT bays and five Nos. 33 kV bays were not included in MYT submission, the same has been requested as a correction in this Licence Amendment Petition.

- 7) *Carnac Receiving Station: It is stated that instead of 14 nos. of 110kV bays, there are 17 110kV bays in Carnac Rs. Please clarify the reason why at the time of Licence Petition, 17 110kV bays were not sought for inclusion.*

Regarding 33kV bays, it is stated that 12 bays have been added as per approved DPR dated 12 April, 2012. However, the in principle approval does not indicate such number. Also, the DPR was for replacement of 33kV bays, the question of additional 12 bays need not arise. Please clarify.

Please clarify the reason for not considering the above 33kV bays at the time of grant of Licence as proposed bays Inspite of being in principally approved by the Commission in 2012. Please clarify whether the revision in above asset was submitted as a part of MYT Petition in Case No. 22 of 2016. Provide extracts of Petition submission.

Response

110 kV Transmission bays at Carnac Receiving Station -

As explained in the Transmission Licence Amendment Application, with respect to 110 kV Transmission Bays at Carnac Receiving Station, we wish to inform Hon'ble Commission that in actual there are 17 nos. 110 kV bays at Carnac Receiving Station. However, during earlier Transmission Licence petition filled in FY 2013-2014, the 110 kV Bays represented are 14 as 3 nos. 110 kV Bays were inadvertently missed out in the submission. We regret the error in the submission.

33 kV Transmission bays at Carnac Receiving Station -

There were a total of 19 nos. existing 33 kV bays at Carnac Receiving Station on Bus Section 1 and 2. Tata Power-T has submitted the DPR for "Replacement of 22 kV and 33 kV bus sections at Carnac Receiving Station" vide letter reference REG/MERC/11/154 dated 30th June, 2011 for it's in principle clearance (Refer **Annexure 5** for DPR). This DPR proposed replacement of the existing 33 kV Bus Sections 1 and 2 along with addition of 14 bays for catering to load growth. The Hon'ble Commission granted its in-principle clearance for this DPR. (Refer **Annexure 6**). However, in actual only 12 additional bays were commissioned against the proposed 14. The actual addition of bays at Bus Section 1 & 2 is as shown in Table below:

Table 2: 33 kV Bus Section 1 & 2 Bays at Carnat

33 kV Bays at Carnat R/S Bus Section 1 & 2			
Bus No.	Existing bays prior to replacement	As per In Principle DPR Approval	Bays Actually Added
Bus Section 1	11	16	16
Bus Section 2	8	17	15
Total	19	33	31

Revision of the asset in MYT Petition -

14 nos. 110 kV Bays and 59 nos. 33 kV Bays and 25 nos. 22 kV Bays are part of the no. of bays in the MYT Petition. 3 nos. 110 kV bays and 2 no. 22 kV Bus PT which were erroneously missed out and removal of 1 no. excess 33 kV Bay, will be taken up during the MTR Petition.

- 8) *Please submit the copy of Petition to STU for STUs recommendations on the amendment proposed.*

Response

We wish to inform Hon'ble Commission that Tata Power-T has forwarded the copy of Transmission Licence Amendment Application Petition of Tata Power-T to Chief Engineer STU vide email communication on 25th October, 2015. The copy of the submission was also been despatched to STU office at Prakashganga through courier service on following day i.e. 26th October 2015,

Further we have once again sent the hard copy of the submission to Office of Chief Engineer STU on 6th January, 2017 as advised by Hon'ble Commission through this data gap query. We are attaching the acknowledgement copy of this letter as **Annexure 7** to this submission. We will submit the response of STU as soon as the same is provided by them.