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1. EXECUTIVE SUMMARY

1.1 Historical Perspective:

The Tata Power Company Limited (“Tata Power”) is a Company established in 1919. On April 1, 2000, The Tata Hydro-Electric Power Supply Company Limited (established in 1910) and The Andhra Valley Power Supply Company Limited (established in 1916) were merged into Tata Power, to form one unified entity. Consequent to the merger, the Licences of the above- mentioned companies were also merged and Tata Power was granted a Licence by the Government of Maharashtra (GoM) for the supply of energy to the public in its Mumbai Licence Area and to supply energy in bulk to Distribution Licensees, vide resolution No: IEA –2001/ CR-10509/NRG-1, dated July 12, 2001.

1.2 Installed Capacity of Thermal and Hydro Generation

The existing installed generation capacity of Tata Power-G is 1377 MW comprising of 447 MW of Hydro Generation and 930 MW of Thermal Generation. The station-wise and unit-wise break up of total capacity of Tata Power-G is given in the following Table:

Table 1-1: Installed Capacity of Generating Stations

Generation Unit	Type of Fuel	Unit Status	Capacity
Unit 5	Coal, Oil and Gas	Operational	500
Unit 7	Gas	Operational	180
Unit 8	Coal	Operational	250
Total Thermal Capacity			930
Bhira	Hydro	Operational	300
Bhivpuri	Hydro	Operational	75
Khopoli	Hydro	Operational	72
Total Hydro Capacity			447
Total Generation Capacity			1377

The entire generation capacity is tied up on a long-term basis with two Distribution Utilities in Mumbai:

- (i) Brihan Mumbai Electric Supply and Transport (BEST)
- (ii) The Tata Power Company Ltd. - Distribution Business (Tata Power-D)

The share of the operating generation capacity tied up with the Distribution Licensees for each of the above-mentioned capacities is as follows:

Table 1-2: Power Purchase Agreements of Tata Power-G with Distribution Utilities

Generation Unit	Type of Fuel	Generation Capacity (MW)	Tie up with Best		Tie up with TPC -D	
			%	MW	%	MW
Unit 5	Coal, Oil and Gas	500	51.17%	256	48.83%	244
Unit 7	Gas	180	51.17%	92	48.83%	88
Unit 8	Coal	250	40%	100	60%	150
Total Thermal Capacity		930		448		482
Bhira	Hydro	300	51.17%	154	48.83%	146
Bhivpuri	Hydro	75	51.17%	38	48.83%	37
Khopoli	Hydro	72	51.17%	37	48.83%	35
Total Hydro Capacity		447		229		218
Total Generation Capacity		1377		677		700

The above-mentioned long-term capacity tie up agreement / arrangement is valid till the end of FY 2023-24 i.e. up to 31st March 2024. Based on the prior experience and cost benefit analysis for bundled cost of power, we request the Hon’ble Commission to determine Tariff for the entire Control Period FY 2020-21 to FY 2024-25 considering that power will be tied up with Best & Tata Power-D as per the existing arrangement in FY 2024-25 also.

1.3 Filings under Present Petition:

Tata Power-G, in this petition, has presented the following for different years as given below:

1.3.1 As per MERC (MYT) Regulations, 2015:

- I. Truing up of FY 2017-18 based on actual performance
- II. Truing up of FY 2018-19 based on actual performance
- III. Provisional Truing up of FY 2019 -20
- IV. Gap / (Surplus) at the end of FY 2019 -20
- V. Status of Compliance to Directives

1.3.2 As per MERC (MYT) Regulations, 2019:

- I. Projections for FY 2020-21 to FY 2024-25
- II. Fixed Cost and Energy Charge for FY 2020-21 to FY 2024-25

The brief summary of the submission for the actual performance for FY 2017-18 & FY 2018-19 and projections for the period FY 2020-21 to FY 2024-25 have been presented below.

1.4 Operational Performance of Tata Power-G:

1.4.1 Availability and PLFs of Generating Units

The Availability and the Plant Load Factors (PLFs) of the Generating Units over the period FY 2017-18 to FY 2024-25 is presented in the Table below:

Table 1-3: Availability & PLF of Generating Units

Unit	Availability								
	FY 2017-18	FY 2018-19	FY 2019-20	Normative	FY 2020-21	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
	<i>Actual</i>	<i>Actual</i>	<i>Estimate</i>		<i>Projections</i>				
Unit 5	93.87%	92.64%	95.06%	85.00%	91.78%	97.26%	91.78%	96.99%	91.78%
Unit 7	98.10%	97.04%	90.76%		98.08%	98.08%	98.08%	97.81%	91.78%
Unit 8	91.75%	99.91%	88.60%		98.08%	93.15%	98.08%	92.90%	98.08%
Thermal	94.12%	95.31%	92.49%		94.69%	96.31%	94.69%	96.05%	93.47%
Bhira	98.72%	99.34%	95.88%	90.00%	97.39%	97.39%	99.58%	99.85%	99.59%
Bhivpuri	99.36%	100.00%	99.05%		96.59%	97.94%	99.58%	99.85%	99.59%
Khopoli	100.00%	99.91%	96.59%		0.00%	0.00%	0.00%	0.00%	0.00%

Unit	PLF							
	FY 2017-18	FY 2018-19	FY 2019-20	FY 2020-21	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
	<i>Actual</i>		<i>Estimate</i>	<i>Projections</i>				
Unit 5	73.15%	70.97%	70.93%	72.21%	77.29%	72.01%	75.72%	76.70%
Unit 7	85.85%	89.47%	73.88%	80.92%	80.92%	80.92%	80.92%	75.95%
Unit 8	79.28%	91.73%	77.41%	85.85%	80.99%	83.98%	78.32%	87.02%

Table 1-4: Overall Operational Performance of Generating Units

Thermal

Particulars	FY 2017-18		FY 2018-19		FY 2019-20	
	Approved	Actual	Approved	Actual	Approved	Proposed
Availability (%)	85.00%	94.12%	85.00%	95.31%	85.00%	92.49%
Plant Load Factor (%)	85.00%	77.26%	85.00%	79.77%	85.00%	73.24%
Gross Generation (MU)	6239.38	6294.14	6189.00	6303.61	6189.00	5983.41
Net Generation (MU)	5909.68	5960.98	5811.08	5974.24	5957.71	5654.82

Hydro

Particulars	FY 2017-18		FY 2018-19		FY 2019-20	
	Approved	Actual	Approved	Actual	Approved	Proposed
Availability (%)	90.00%	97.42%	90.00%	97.95%	90.00%	95.46%
Gross Generation (MU)	1521.83	1524.92	1470.00	1575.91	1470	1515.05
Net Generation (MU)	1498.24	1491.13	1447.22	1546.78	1447.22	1481.25

S. No.	Particulars	FY 2020-21	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
A	Thermal Station					
1	Availability (%)	94.58%	96.42%	94.58%	96.16%	93.32%
2	PLF (%)	77.35%	78.77%	76.74%	77.42%	79.11%
3	Gross Generation (MU)	6318.78	6435.16	6269.32	6324.77	6462.73
4	Net Generation (MU)	5876.74	5987.85	5831.85	5886.78	6006.79
B	Hydro Stations (Overall)					
1	Availability (%)	97.00%	97.31%	97.49%	93.60%	97.80%
2	Gross Generation (MU)	1470.00	1470.00	1470.00	1470.00	1470.00
3	Net Generation (MU)	1444.75	1444.75	1444.75	1444.75	1444.75

1.4.2 Generation from Tata Power-G

The actual generation during the period FY 2017-18 & FY 2018-19 from the various Generating Units of Tata Power - G and proposed generation for the period FY 2020-21 to FY 2024-25 is as given in the Table below:

Table 1-5: Gross & Net Generation of Tata Power Generating Stations

Unit	Gross Generation							
	FY 2017-18	FY 2018-19	FY 2019-20	FY 2020-21	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
	Actual		Estimated	Projections				
Unit 5	3204.15	3108.34	3115.28	3162.83	3385.50	3154.24	3325.46	3359.49
Unit 7	1353.67	1410.81	1168.13	1275.91	1275.91	1275.91	1279.48	1197.50
Unit 8	1736.32	1784.47	1700.00	1880.04	1773.75	1839.16	1719.83	1905.74
Hydro	1524.92	1575.91	1515.05	1470.00	1470.00	1470.00	1470.00	1470.00

Unit	Net Generation							
	FY 2017-18	FY 2018-19	FY 2019-20	FY 2020-21	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
	Actual		Estimated	Projections				
Unit 5	3026.91	2928.31	2929.03	2941.43	3148.51	2933.45	3092.68	3124.33
Unit 7	1314.46	1371.38	1133.51	1237.63	1237.63	1237.63	1241.09	1161.58
Unit 8	1619.61	1674.55	1592.28	1697.68	1601.70	1660.76	1553.01	1720.88
Hydro	1491.13	1546.78	1481.25	1444.75	1444.75	1444.75	1444.75	1444.75

1.4.3 Heat Rates & Auxiliary Consumption

The actual Heat Rates and Auxiliary Consumption for FY 2017-18 & FY 2018-19 and provisional figures for FY 2019-20 have been presented in the Table below. For the period FY 2020-21 to FY 2024-25, the normative values as per MYT Regulations, 2019 have been considered.

Table 1-6: Heat Rates for Generating Units

Unit	Heat Rate (Kcal/kWh)					
	FY 2017-18		FY 2018-19		FY 2019-20	
	Normative	Actual	Normative	Actual	Normative	Estimated
Unit 5	2533	2520	2541	2509	2549	2528
Unit 7	2028	2015	2031	1998	2027	2014
Unit 8	2450	2303	2450	2295	2450	2328

Table 1-7: Auxiliary Consumption for Generating Units

Unit	Auxiliary Consumption (%)					
	FY 2017-18		FY 2018-19		FY 2019-20	
	Normative	Actual	Normative	Actual	Normative	Estimate
Unit 5	6.00%	5.53%	6.00%	5.79%	6.00%	5.98%
Unit 7	3.00%	2.90%	3.00%	2.79%	3.00%	2.96%
Unit 8	8.50%	6.72%	8.50%	6.16%	8.50%	6.34%
Hydro	1.55%	2.22%	1.55%	1.85%	1.55%	2.23%

1.5 Financial Performance of Tata Power-G:

1.5.1 Capital Expenditure and Capitalisation

Tata Power – G has presented in the Table below, the actual capitalisation for FY 2017-18 & FY 2018-19, estimated capitalisation for FY 2019-20 and the projected capitalisation for the Control Period FY 2020-21 to FY 2024-25 as follows:

Table 1-8: Capitalisation (Thermal & Hydro)

Particulars	Capitalisation							
	FY 2017-18	FY 2018-19	FY 2019-20	FY 2020-21	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Unit 4 to 7 & Hydro Stations								
DPR	66.66	36.14	75.54	70.07	119.96	21.22	0.00	0.00
Non-DPR	13.18	25.47	20.20	2.17	3.67	1.16	1.16	1.16
Total	79.84	61.61	95.74	72.24	123.63	22.38	1.16	1.16
Unit 8								
DPR	0.56	0.27	0.29	10.08	44.35	0.24	0.24	0.24
Non-DPR	1.56	4.41	0.01	0.00	0.00	0.00	0.00	0.00
Total	2.12	4.68	0.30	10.08	44.35	0.24	0.24	0.24

1.5.2 Annual Fixed Charges

The Annual Fixed Charges have been arrived at for Trombay Station , Hydro and Unit 8 by using the principles laid down in MYT Regulations, 2015 for FY 2017-18, FY 2018-19 and FY 2019-20 and MYT Regulations, 2019 for FY 2020-21 to FY 2024-25 and are as shown in the Table below:

Table 1-9: Annual Fixed Charges (Thermal and Hydro)

Rs. Crore

Particulars	Rs. Crores							
	FY 2017-18	FY 2018-19	FY 2019-20	FY 2020-21	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Unit 4 to 7 & Hydros								
O&M Charges	475.90	404.08	463.48	482.84	497.70	513.02	528.82	545.10
Interest on Long Term Loans	52.97	36.22	26.12	15.94	6.24	1.04	-	-
Interest on Working Capital	19.06	27.28	34.93	35.11	35.41	35.78	36.09	36.27
Interest and Finance Charges	2.81	0.83	-	-	-	-	-	-
Depreciation	152.39	128.94	174.72	178.56	183.04	186.37	186.91	186.96
Income Tax	136.11	131.67	131.67	-	-	-	-	-
Return on Equity	244.99	211.59	210.79	309.19	315.75	320.64	321.42	321.50
Annual Fixed Charges	1084.23	940.62	1041.71	1021.64	1038.14	1056.84	1073.25	1089.85
Less:								
Non Tariff Income	20.98	30.86	30.86	30.86	30.86	30.86	30.86	30.86
Unit 4 Fixed Charges	4.12	-	-	-	-	-	-	-
Allocation to Unit 8 towards shared capacity	11.76	12.35	12.02	11.69	11.35	11.02	10.69	10.36
Net Annual Fixed Charges	1047.37	897.41	998.83	979.10	995.93	1014.97	1031.70	1048.63

Table 1-10: Annual Fixed Charges (Unit 8)

<i>Rs. Crores</i>								
Particulars	FY 2017-18	FY 2018-19	FY 2019-20	FY 2020-21	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Unit 8								
O&M Charges	68.69	59.47	68.88	69.73	72.23	74.83	77.53	80.33
Interest on Long Term Loans	39.10	31.41	26.30	21.46	17.88	13.89	8.53	3.16
Interest on Working Capital	5.13	10.20	11.34	11.23	11.27	11.34	11.37	11.35
Interest and Finance Charges	4.67	0.02	-	-	-	-	-	-
Depreciation	62.13	62.16	59.58	59.84	61.18	62.28	62.29	62.30
Income Tax	25.64	27.15	27.15	-	-	-	-	-
Return on Equity	55.72	56.27	56.33	64.53	65.97	67.16	67.17	67.18
Expenditure towards shared capacity of Unit 5 & 7	11.76	12.35	12.02	11.69	11.35	11.02	10.69	10.36
Annual Fixed Charges	272.83	259.02	261.60	238.47	239.88	240.51	237.57	234.68
Less:								
Non Tariff Income	1.50	0.09	0.09	0.09	0.09	0.09	0.09	0.09
Net Annual Fixed Charges	271.33	258.94	261.52	238.38	239.79	240.42	237.48	234.59

1.6 Fuel Prices:

Tata Power-G uses Imported Coal, Domestic Natural Gas (under APM mechanism), Oil (LSHS) and Imported RLNG (Re-Gasified Liquid Natural Gas) for its Generating Units at Trombay. The Coal is imported from Indonesia under long term contracts. The Gas and RLNG is supplied by GAIL whereas Oil (LSHS) is sourced from local oil refineries.

The projections of the fuel prices for the Control Period from FY 2020-21 to FY 2024-25 has been work out as per Regulation 50.6 of MYT Regulations, 2019 by considering last three months weighted average price in the Table below:

Table 1-11: Fuel Prices Projections from FY 2020-21 to FY 2024-25

Coal	Rs / MT	Rs / Mkcal	GCV
Jul-19	6591	1424	4.628
Aug-19	6397	1350	4.738
Sep-19	6321	1362	4.641
Weighted Average	6440	1380	4.666

APM	Rs / MT	Rs / Mkcal	GCV
Jul-19	17416	1322.93	13.16
Aug-19	18100	1379.00	13.13
Sep-19	19933	1531.26	13.02
Weighted Average	18023	1373	13.13

RLNG	Rs / MT	Rs / Mkal	GCV
Jul-19	0.00	0.00	0.00
Aug-19	43487	3320	13.10
Sep-19	0.00	0.00	0.00
Weighted Average	43487	3320	13.10

Oil	Rs / MT	Rs / Mkal	GCV
Jul-19	55344	5352	10.34
Aug-19	55367	5344	10.36
Sep-19	55358	5353	10.34
Weighted Average	55364	5346	10.36

1.7 Energy Charges

Considering the projected fuel prices for the Control Period FY 2020-21 to FY 2024-25, the Energy Charges (in Rs. /kWh) are projected in the Table below for each of the Thermal Generating Units 5, 7 & 8 fuel wise:

Table 1-12: Energy Charges Trombay Station and Unit 8

Particulars		Projections (Rs / kWh)				
		FY 21	FY 22	FY 23	FY 24	FY 25
Unit 5	Oil	14.653	14.653	14.653	14.653	14.653
Unit 5	Coal	3.783	3.783	3.783	3.783	3.783
Unit 5	RLNG	9.100	9.100	9.100	9.100	9.100
Unit 7	APM	2.880	2.880	2.880	2.880	2.880
Unit 7	RLNG	6.965	6.965	6.965	6.965	6.965
Unit 8	Coal	3.707	3.707	3.707	3.707	3.707
Unit 8	Oil	0.028	0.028	0.028	0.028	0.028

It may be noted that as explained above, Unit 6 energy charge shown in the Table above is reflecting the price of existing oil stock which was procured earlier at the prevailing rates then. However, in case the Unit 6 is required to generate, the energy charge will factor in the projected oil prices to the extent of the level of generation. Considering the projected oil prices, the energy charge may accordingly reduce. The Capacity and Energy Charge for Hydro for the Control period from FY 2020-21 to FY 2024-25 are as shown in the Table below:

Table 1-13: Capacity and Energy Charge for Hydro Stations for FY 2020-21 to FY 2024-25

Particulars	UoM	FY21			FY22			FY23			FY24			FY25		
		Bhira	Bhivpuri	Khopoli	Bhira	Bhivpuri	Khopoli	Bhira	Bhivpuri	Khopoli	Bhira	Bhivpuri	Khopoli	Bhira	Bhivpuri	Khopoli
Fixed Cost for Hydro	Rs Cr	129.79	88.24	132.83	135.09	90.34	137.50	138.88	92.06	141.63	139.39	93.38	144.38	141.09	94.65	146.50
NAPAF	%	90.00%	90.00%	90.00%	90.00%	90.00%	90.00%	90.00%	90.00%	90.00%	90.00%	90.00%	90.00%	90.00%	90.00%	90.00%
Projected Availability	%	98.58%	97.39%	96.59%	99.05%	97.39%	97.94%	98.76%	99.58%	99.58%	92.90%	99.85%	99.85%	99.22%	99.59%	99.59%
Capacity Charges	d=0.5*a *c/b	71.08	47.74	71.28	74.34	48.88	74.81	76.20	50.93	78.35	71.94	51.80	80.09	77.77	52.37	81.05
Design Energy	MUs	744.12	193.23	174.68	744.12	193.23	174.68	744.12	193.23	174.68	744.12	193.23	174.68	744.12	193.23	174.68
Auxiliary Consumption	%	1.72%	1.72%	1.72%	1.72%	1.72%	1.72%	1.72%	1.72%	1.72%	1.72%	1.72%	1.72%	1.72%	1.72%	1.72%
Net Designed Energy	d=b*(1-c)	731.34	189.91	171.68	731.34	189.91	171.68	731.34	189.91	171.68	731.34	189.91	171.68	731.34	189.91	171.68
Energy Charge Rate	e = 0.5*a/d	0.887	2.323	3.868	0.924	2.378	4.004	0.950	2.424	4.125	0.953	2.458	4.205	0.965	2.492	4.267

1.8 Incentives, Uncontrollable Expenditure and Sharing of Gains and Losses:

Tata Power-G is entitled to earn incentives in the event of the operational performance being better than the norms set by the Hon’ble Commission. Similarly, any approved uncontrollable expenditure has to be passed on to the consumers, whereas any approved gain or loss in the controllable factors has to be shared with the consumers in the ratio as specified in the Regulations. Accordingly, Tata Power-G has worked out the applicable incentives, identified the uncontrollable expenditures and calculated the gain / (loss) on controllable factors for FY 2017- 18 & FY 2018-19.

The truing up for FY 2017-18 & FY 2018-19 has been carried out considering the above-mentioned principles set under the MYT Regulations 2015. The Net Gain / (Loss) for FY 2017-18 & FY 2018-19 is presented in the Table below:

Table 1-14: Sharing of Gain / (Loss) of Unit 5, 7 & Hydro for FY 2017-18 & FY 2018-19

Rs. Crores

Particulars	FY 2017-18		FY 2018-19	
	Gains / Loss	Passed on to the Beneficiaries	Gains / Loss	Passed on to the Beneficiaries
Heat Rate	6.78	4.52	18.95	12.63
O&M	62.37	41.58	78.40	52.27
Auxilliary Consumption	4.23	2.82	2.60	2.60
Total	73.37	48.92	99.95	67.50

Table 1-15: Sharing of Gain / (Loss) of Unit 8 for FY 2017-18 & FY 2018-19

Rs. Crores

Particulars	FY 2017-18		FY 2018-19	
	Gains / Loss	Passed on to the Beneficiaries	Gains / Loss	Passed on to the Beneficiaries
Heat Rate	36.23	24.15	44.35	29.57
O&M	-18.62	-6.21	9.20	6.13
Auxilliary Consumption	12.69	8.46	16.58	11.05
Total	30.30	26.40	70.13	46.75

As can be seen from the above Table, the consumers would be benefitted on account of efficient operations of the Generating Units.

1.9 Net Gap / (Surplus) for FY 2017-18 & FY 2018-19 and FY 2019-20

Based on the ARR arrived at after the Truing Up exercise of FY 2017-18 & FY 2018-19, the Revenue earned during the year, the provisional truing up of FY 2019-20, the amount already recovered from Distribution Utilities and the Carrying cost, the Net Gap / (Surplus) to be recovered from / shared with Distribution Licensees is brought out in the Table below:

Table 1-16: Gap / (Surplus) of Tata Power-G Unit 5, 7 & Hydro for FY 2017-18, FY 2018-19 and FY 2019-20

Rs. Crores

S. No.	Particulars	FY 2017-18		FY 2018-19		FY 2019-20	
		Approved	Claimed	Approved	Claimed	Approved	Proposed
A	Expenditure						
1	Total Fuel Related Expenses	1245.34	1271.76	-	1,383.39		1399.03
2	Operation & Maintenance (O&M) Expenses	525.73	455.11	465.94	377.95	481.40	463.48
3	Depreciation	150.84	152.39	153.64	128.94	155.89	174.72
4	Interest on Long-term Loan Capital including financing and refinancing charges	50.80	52.97	41.74	36.22	31.40	26.12
5	Interest on Working Capital (IoWC)	35.85	7.52	33.03	24.86	18.02	34.93
6	Other Expenses	-	0.85	0.00	0.83	0.00	0.00
7	Income Tax	103.34	136.11	103.34	131.67	103.34	131.67
B	Total Revenue Expenditure	2111.90	2076.71		2083.86		2229.94
8	Add: Return on Equity	243.80	244.99	247.55	211.59	250.55	210.79
C	Aggregate Revenue Requirement	2355.70	2321.70		2295.46		2440.73
9	Add: Incentive (PLF, Hydro Incentive)		54.44		62.70		0.00
10	Net Entitlement after sharing of gains/(losses) on account of Fuel Expenses, O&M Expenses and IOWC including Auxiliary Consumption Benefit		36.00		35.73		
11	Net entitlement after sharing of gains(losses) of refinancing of loan		1.96				
12	Less : Unallocated fixed cost portion of Unit 4	12.17	4.12	12.31	0.00		
13	Less : Allocation from Unit 8 for Shared Capacity	12.50	11.76	12.50	12.35	8.75	12.02
14	Less: Non Tariff Income	25.62	20.98	25.62	30.86	25.62	30.86
D	Net Aggregate Revenue Requirement	2305.41	2377.23		2350.68		2397.86
E	Revenue	2,371.24	2,419.13		2372.96		2347.01
F	Revenue Gap/(Surplus) = (D – E)	(65.83)	(41.91)		(22.28)		50.85

Table 1-17: Gap / (Surplus) of Tata Power-G Unit 8 for FY 2017-18, FY 2018-19 and FY 2019-20

<i>Rs. Crores</i>			
Particulars	FY 2017-18	FY 2018-19	FY 2019-20
Revenue	850.39	910.40	833.46
Power Supply	848.89	910.32	833.37
Non-Tariff Income	1.50	0.09	0.09
Expenditure			
Fuel Related Expense	536.41	626.42	549.98
Aux Consumption Benefit	4.23	5.53	0.00
O&M Charges	68.69	59.47	68.88
Depreciation	62.13	62.16	59.58
Interest on Long Term Loans	39.10	31.41	26.30
Interest and Finance Charges	4.67	0.02	0.00
Interest on Working Capital	5.13	10.20	11.34
Income Tax	25.64	27.15	27.15
Return on Equity	55.72	56.27	56.33
Total Expenditure	801.72	878.62	799.57
Incentive (PLF, Hydro)	0.00	2.99	0.00
Total Expenditure including incentive	801.72	881.62	799.57
Add:			
Expenditure towards shared capacity of Unit 4 to 7	11.76	12.35	12.02
Total ARR	813.48	893.97	811.59
Net Gap/(Surplus)	-36.92	-16.44	-21.87

1.10 Past Recovery

Table 1-18: Summary of past recovery for FY 2015-16 & FY 2016-17

Particulars		Rs. Crores		
		AS per MYT Petition		
		BEST	TPC-D	Total
For FY 2015-16				
Impact of Review Order in Case No. 320 of 2018	Trombay Station & Hydro	2.30	2.59	4.89
Impact of Reinstatement of Brand Equity Expenditure	Trombay Station & Hydro	1.23	1.17	2.40
Impact of Review Order in Case No. 320 of 2018	Unit 8	0.04	0.05	0.09
Impact of Reinstatement of Brand Equity Expenditure	Unit 8	0.11	0.17	0.29
Total Impact of Review Order on Truing Up of FY 2015-16 with Carrying Cost - I		5.25	5.90	11.15
For FY 2016-17				
Impact of Review Order in Case No. 320 of 2018	Trombay Station & Hydro	2.38	2.27	4.65
Impact of Reinstatement of Brand Equity Expenditure	Trombay Station & Hydro	2.05	1.96	4.01
Impact of Review Order in Case No. 320 of 2018	Unit 8	0.04	0.07	0.11
Impact of Reinstatement of Brand Equity Expenditure	Unit 8	0.57	0.85	1.42
Total Impact of Review Order on Truing Up of FY 2016-17		5.05	5.15	10.20
Total Impact of Review Order on Truing Up of FY 2016-17 with Carrying Cost - II		6.83	6.97	13.79

Table 1-19: Summary of Gap / Surplus for FY 2017-18 to FY 2019-20

Particulars		Rs. Crore			
		AS per MYT Petition			
		BEST	TPC-D	AEML □	Total
For FY 2017-18					
Gap / (Surplus)	Trombay Station & Hydro	-21.44	-20.46	0.00	-41.91
Gap / (Surplus)	Unit 8	-14.77	-22.15	0.00	-36.92
Total Gap / (Surplus) for FY 2017-18		-36.21	-42.61	0.00	-78.82
Incremental Gap / (Surplus) for FY 2017-18		19.63	22.77	0.00	42.40
Total Gap / (Surplus) for FY 2017-18 including Carrying Cost -III		24.50	28.41	0.00	52.91
For FY 2018-19					
Final Trued up Gap / (Surplus)	Trombay Station & Hydro	-11.40	-10.88	0.00	-22.28
Final Trued up Gap / (Surplus)	Unit 8	-19.06	-23.27	0.00	-42.32
Entry Tax amount to be recovered pertaining to FY 2013-14 (Paid in FY 2018-19)	Trombay Station & Hydro	10.37	10.71	0.00	21.08
Total Gap / (Surplus) for FY 2018-19		-20.09	-23.43	0.00	-43.52
Total Gap / (Surplus) for FY 2018-19 including Carrying Cost -IV		-23.05	-26.88	0.00	-49.93
For FY 2019-20					
Provisional Gap / (Surplus)	Trombay Station & Hydro	26.02	24.83	0.00	50.85
Provisional Gap / (Surplus)	Unit 8	-8.75	-13.12	0.00	-21.87
Recovery of Entry Tax amount paid under Amnesty Scheme, 2019	Trombay Station & Hydro	118.98	98.03	59.21	276.22
Difference in the Standby Charges as worked out by Hon'ble ATE and by the Hon'ble Commission	Trombay Station & Hydro	25.85	20.61	15.37	61.84
Total Provisional Gap / (Surplus) for FY 2019-20-V		162.11	130.35	74.58	367.04
Total Past Recovery to be Recovered I to V		175.63	144.74	74.58	394.95

As can be seen from the above Table there is a Net Overall Gap for FY 2017-18 & FY 2018-19 together which is required to be recovered from the Distribution Licensees. This amount is proposed to be recovered from the Distribution Licensees immediately within one month of the Order. In case the Hon'ble Commission deems fit to recover this amount in instalments, we request the Hon'ble Commission to apply appropriate interest as has been done in the previous Tariff Order.

Further, Tata Power-G wishes to submit that it has filed an Appeal No. 281 of 2019 against the MERC Order dated 12th September 2018, in Case No. 65 of 2018. The judgement of the same is awaited and the impact of the same (approximately Rs. 114.23 crores would be considered in the filings for future period along with the carrying cost as applicable.

1.11 Overall Generation tariff determination from FY 2020-21 to FY 2024-25

Tata Power – G has regulated generation capacity at Trombay and across various Hydro stations. Unit wise Fixed cost for the Control Period is presented below:

Table 1-20: Annual Fixed Charges of Unit 5, 7, 8 & Hydro for MYT Control period

Particulars	Fixed Cost (Rs. Crore)				
	FY 2020-21	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Unit-5	450.32	454.98	462.39	471.69	481.10
Unit-7	177.92	178.02	179.99	182.86	185.29
Unit-8	238.38	239.79	240.42	237.48	234.59
Bhira	71.08	74.34	76.20	71.94	77.77
Bhivpuri	47.74	48.88	50.93	51.80	52.37
Khopoli	71.28	74.81	78.35	80.09	81.05

Table 1-21: Projected ARR for Thermal Units including Unit 8 and Hydro (Rs. Crore)

S. No.	Particulars	FY 2020-21	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
A	Expenditure					
1	Total Fuel Related Expenses	2281.68	2330.43	2275.73	2299.17	2353.51
2	Operation & Maintenance (O&M) Expenses	552.57	569.93	587.85	606.34	625.43
3	Depreciation	238.40	244.22	248.65	249.20	249.27
4	Interest on Long-term Loan Capital including financing and refinancing charges	37.39	24.12	14.93	8.53	3.16
5	Interest on Working Capital (IoWC)	46.35	46.68	47.11	47.46	47.63
6	Other Expenses	0.00	0.00	0.00	0.00	0.00
B	Total Revenue Expenditure	3156.39	3215.37	3174.27	3210.70	3279.00
7	Add: Return on Equity	373.72	381.72	387.79	388.59	388.68
C	Aggregate Revenue Requirement	3530.11	3597.09	3562.06	3599.30	3667.68
8	Less: Non Tariff Income	30.94	30.94	30.94	30.94	30.94
D	Net Aggregate Revenue Requirement	3499.16	3566.15	3531.12	3568.35	3636.74

We request the Hon'ble Commission to accept the submissions made through this Petition.