Maharashtra State Electricity Distribution Co. Ltd. महाराष्ट्र राज्य विद्युत वितरण कंपनी मर्यादित

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Ref:- MSEDCL/MERC/Ag/ NO 1 7 8 1

Date:- 16 01 2020

To,

The Secretary,

Maharashtra Electricity Regulatory Commission World Trade Centre, Centre No.1, 13th Floor Cuffe Parade, Mumbai

Subject: MSEDCL's comments on Agriculture Sales Estimation Draft Analysis by Working Group

Reference:

- 1) MERC order dated 02.11.2018 for constitution of working group.
- 2) Working group meeting dtd 02.01.2020

Sir,

MERC vide its order under reference (1), constituted the Working Group for Agricultural Consumption Study and subsequently held four meetings of Working Group. Furthe the Survey of feeders is started in Sept 19. Till date 70% survey is completed. Meanwhile Prayas Energy Group has presented draft analysis on Ag sales Estimation in Working Group meeting dated 02.01.2020.

Observations regarding following points has been presented by Prayas Energy Group,

- Analysis of survey data
- Metering status
- Pump usage
- Pump operational status
- Analysis of feeder load profile
- Estimation of AG sales for FY 18-19

After using some of the data Prayas Energy group has developed a methodology for estimation of Ag Sale.

Prayas Energy Group methodology:

- Feeder meter(FM) input as primary parameter
- FM Technical Loss non AG sales = Ag consumption (MU)
- Ag consumption / Ag connected load = feeder consumption norm (kWh / HP / yr and Hrs./yr)
- Develop norm for each quartile, based on Ag load weightage/ratio of each sample feeder in that quartile to total Ag load of all sample feeders in that quartile
- Technical Loss range between 6 % to 28 %, Wt. average 18 %

Quartile	Number of Feeders	Wt. average Loss %
1st	21	19
2nd	8	19
3rd	11	16
4th	4	11



Below graph estimating AG sale with feeder loss range and Annual hours of pumping.

Range – 21,000 MU to 23,800 MUs

Ag Sale Estimated using above methodology: 22,500MUs

Comments of MSEDCL on Estimation of AG sales for FY 18-19:

 While estimating total MSEDCL Ag sale, Prayas has not considered 3,23,587 number of Ag consumers having 19,76,971 HP Load connected on mixed feeders.

2. Technical Loss of Feeder:

The detail calculation of Technical loss arrived by Prayas is not available with MSEDCL, but from presentation shared it seems that technical loss is calculated on the basis of few assumption. Also, while capturing I²R loss, the current considered is not specified.

In order to determine requirement of new sub-stations, Augmentation of Power Transformer, New feeder erection, MSEDCL has updated the feeder level data like length of feeder, Conductor type, DTC capacity and load on DTC etc. in IT system of nearly 75% feeders. %Voltage regulation of these feeders is calculated through IT System. MSEDCL is taking all out efforts for updation of balance feeder information. On the basis of this data planning for HVDS is also being done. Further MSEDCL is doing GIS survey of all HT feeders. The SLDs are plotted as per the survey data on the GIS map. For calculation of technical loss, actual details of feeders are considered and technical loss for 37 numbers of feeders having AMR/MRI data is calculated. The detail calculation is explained below and calculation sheet of 37 feeders is enclosed. Also SLDs plotted on GIS map for 12 feeders out of these 37 is attached herewith.

HT Line Loss Calculation:

MSEDCL has worked out HT line loss on actual details of feeder and AMR/MRI data of feeder for sample 37 nos. of feeders.

- The Technical loss calculation is based on factors like length of feeder, Sp. resistance of conductor, loading of feeder and duration.
- The loss is calculated considering various loading condition (interval are divided into times slots of 5% of Maximum loading on the feeder) and usage hours.
- The actual distance of DTCs from sub-station and feeder is taken.
- The current consumed by DTC is calculated considering the individual DTC capacity and Total Capacity of DTCs on the Feeder.
- The resistance of line calculated by considering conductor specific resistance /KM and length of the feeder.
- The I²R (Copper losses) of HT feeder is calculated similarly, considering average current of different time slots (based on loading condition).

LT Line Loss Calculation:

Also while calculating LT loss Prayas group has considered 50% loading at middle point of LT feeder which is not realistic and is based on assumption. However MSEDCL has calculated LT line losses based on following actual data.

- DTC wise consumers connected load, distance of installation from DTC.
- The HT side current of DTC considering individual DTC capacity and total DTCS with average feeder current loading for the duration.
- LT current is derived from corresponding HT current & transformation ratio.
- The average current loading of individual consumer connection is determined by taking in consideration of connected load of consumer in proportion to total load on that DTC.
- The copper loss (I²R) is calculated for every consumers, considering distance of load from DTC.
- The copper losses of all consumers aggregated to arrive copper loss (LT Line loss) at DTC Level.

DTC Loss Calculation:

Further while calculating DTC loss the Prayas has taken DTC input as Feeder input less Feeder line loss. However they have not considered the variation in the capacity and distance of the DTC from substation while calculating the DTC input and losses.

MSEDCL has worked out the DTC loss considering actual site conditions,

- In the distribution transformer losses are occurred due to magnetic field and resistance of transformer windings.
- The losses are Iron loss (Fixed Loss) & Variable loss (I²R) loss.
- The standard values (as per MSEDCL transformer specification) of Cu loss and Iron losses are taken for calculation of Transformer losses.
- The % loading of each transformer is calculated and corresponding Cu losses in units (kwh) are determined for different hours based on loading conditions.
- The Total transformer loss is summation of Cu loss units and Iron Loss units.

3% losses are accounted for deteriorated lines due to aging, joints on HT/LT lines, repaired DTCs and non-ideal field conditions.

The Total Technical Loss of feeder is = HT Line Loss+ DTC Loss + LT Line Loss+3%

From detail calculation of 37 feeders, the Technical Loss is in the range of 1.55% to 5.02 %. With addition of 3% losses accounted for deteriorated lines due to aging, joints on HT/LT lines, repaired DTCs and non-ideal field conditions, the technical loss of feeder can be considered as 8%.

The weighted average loss calculated by Prayas is 18%, which is very high. However considering the actual field data Technical losses calculated by MSEDCL is only 8%. So there is 10% difference in losses and correspondingly the rise in Ag sale need to be considered.

3. Ag Sale Estimation:

MSEDCL has already submitted 8737 nos. Ag feeder meter input data to Hon'ble Commission and estimated Ag sale can be calculated by deducting technical loss and Non Ag sale as shown below,

Feeder	No Of	Input	Sale (MUs)	Consumers (Nos)	Connected Load (HP)
Туре	Feeders	(MUs)	NON AG	Ag	Ag
Pure AG	2158	7457	259	776148	4118908
AG SDT	3131	14204	402	1465327	7764338
SPP	3438	12003	1664	1400073	7083789
Total	8727	33664	2325	3641548	18967035

Considering 8% Technical losses, the Ag sale computed is as below,

Description	Estimated AG Sale (Feeder Input - 8% Tech Loss - Non AG Sale)
Pure AG (MUs) -(A)	6602
AG SDT (MUs) -(B)	12665
SPP (Mus) - (C)	9379
Total (Mus) (D=A+B+C)	28645
Connected Load of AG Feeders As per MSEDCL system(HP) – (E)	18967035
Index of AG Feeders (kWh/HP) (F=D/E)	1510
Ag Load on Other Feeders (HP) (G)	2331980
Applying Index of AG Feeder to AG Load connected on Other feeders (MUs) (H=F x G)	3522
Final AG Sale (MUs) (I= D+H)	32167

After deducting (8% technical loss + Non Ag sale) MSEDCL arrived at Ag sale on Ag Feeders (Pure Ag, Ag with SDT & Single Phasing) and Index. After applying this Index to the Ag Connected load of other mixed feeders final Ag sale is estimated as **31411MUs**. Further it is also to be noted that there may be upto 5% variation in the estimated figure and hence the Ag sale submitted by MSEDCL is correct and factual.

4. Consumption of EHV feeders feeding to Ag dominated MSEDCL Sub-Stations (feeding to 502 MSEDCL feeders):

In order to establish year on year variation in Ag sale against EHV input, analysis of 234 EHV feeders feeding to 502 feeders selected by Prayas is as below..

	234 EH\	/ feeders	Total MSEDCL											
H1	EHV input	AG Sale	Total MSEDCL I/p	MSEDCL Ag sales	Total MSEDCL Sales									
16-17	3,105	2,123	55291	10720	48328									
17-18	4,046	2,739	60927	12813	52124									
18-19	4,661	3,227	65804	15316	57697									
Year- on -Year trend (%)														
FY 17-18/16-17	30.29	29.03	10.19	19.52	7.85									
FY 18-19/17-18	15.19	17.82	8.01	19.53	10.69									
	234 EH\	/ feeders	To	otal MSEDCL										
H2	EHV input	AG Sale	Total MSEDCL I/p	MSEDCL Ag sales	Total MSEDCL Sales									
16-17	5,099	3,463	61503	16687	51319									
17-18	4,990	3,465	62945	16992	54529									
18-19	5,200	3,592	66637	17240	56688									
	Ye	ar- on -Yea	r trend (%)											
FY 17-18/16-17	-2.14	0.08	2.35	1.83	6.26									
FY 18-19/17-18	4.20	3.66	5.86	1.46	3.96									
	234 EHV feeders T													
FY	EHV input	AG Sale	Total MSEDCL I/p	MSEDCL Ag sales	Total MSEDCL Sales									
16-17	8,204	5,586	1,16,794	27,407	99,647									
17-18	9,036 9,860	6,204 6,819	1,23,872	29,805	1,06,653									
18-19	1,32,441	32,556	1,14,385											
	Ye	ar- on -Year	r trend (%)											
FY 17-18/16-17	10.14	11.08	6.06	8.75	7.03									
FY 18-19/17-18	9.12	9.91	6.92	9.23	7.25									

From above Table, it is seen that MSEDCL's Ag sale rise for FY18-19 (9.23%) is in line with the input rise of EHV feeders (9.12%).

5. Comparison with Other states: Further during Ag working Group meeting dtd. 02.01.2020, the Ag consumption and index of other states was discussed. For Punjab and Gujrat the index is 1700 Kwh/HP/Annum, whereas in Rajasthan it is in the range of 1325 – 2314 kWh/HP/Annum. Index arrived by MSEDCL is 1510kWh/HP/Annum, which is well below the other states index.

6. Circle wise losses: Further it is submitted that MSEDCL is calculating Circlewise Losses by taking Input & sale energy of that particular Circle & for FY 18-19 the losses of Non Ag circles such as Washi Circle - 6.70%, Ganeshkhind Circle - 8.10%, Nagpur Urban - 4.10% etc. Also the Towns from Ag dominated circles has non AG Consumption these towns losses are on higher side upto 64.21%, the details of such Towns is attached as Annexure 3, which is also available MSEDCL website and also submitted to Ministry of Power, GoI. Hence the presumption that non Ag sale is being booked in Ag sale is not correct considering the losses of non Ag Circles, Losses of Towns of Ag dominated Circles also by correlating with EHV feeder input of Ag dominated feeders.

From all above analysis and points mentioned in above para's Ag sale submitted by MSEDCL in it's MYT petition is correct and factual. It is further to submit that any correction or revision in MSEDCL's Ag sales based on assumption and sampling methodology will severally affect MSEDCL's financial position.

Yours Faithfully

(Satish Chavan)

Director (Commercial), MSEDCL

Encl: 1. Annexure 1-Technical Loss of 37 Feeders

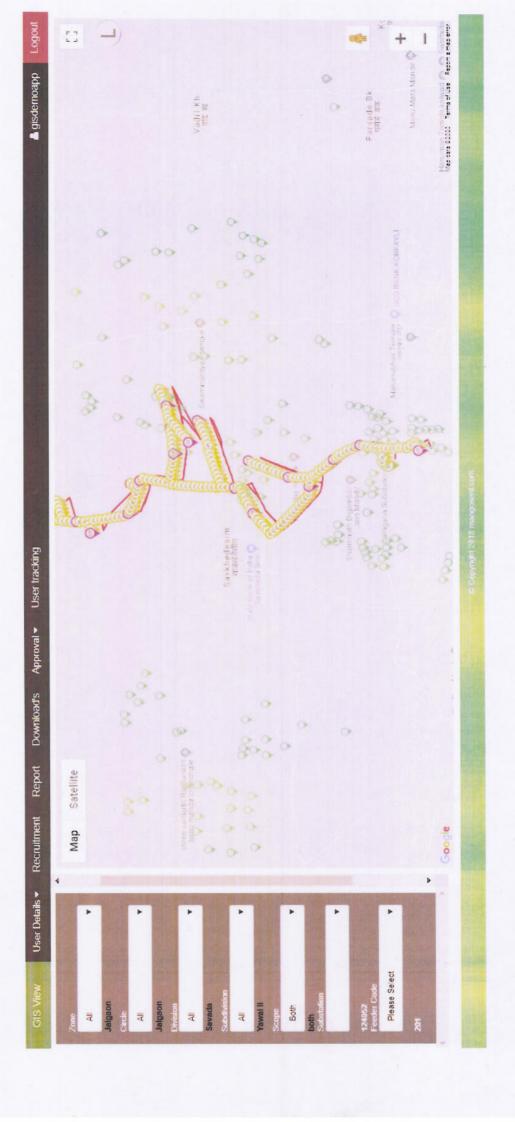
2. Annexure 2 - GIS SLDs of 12 Feeders

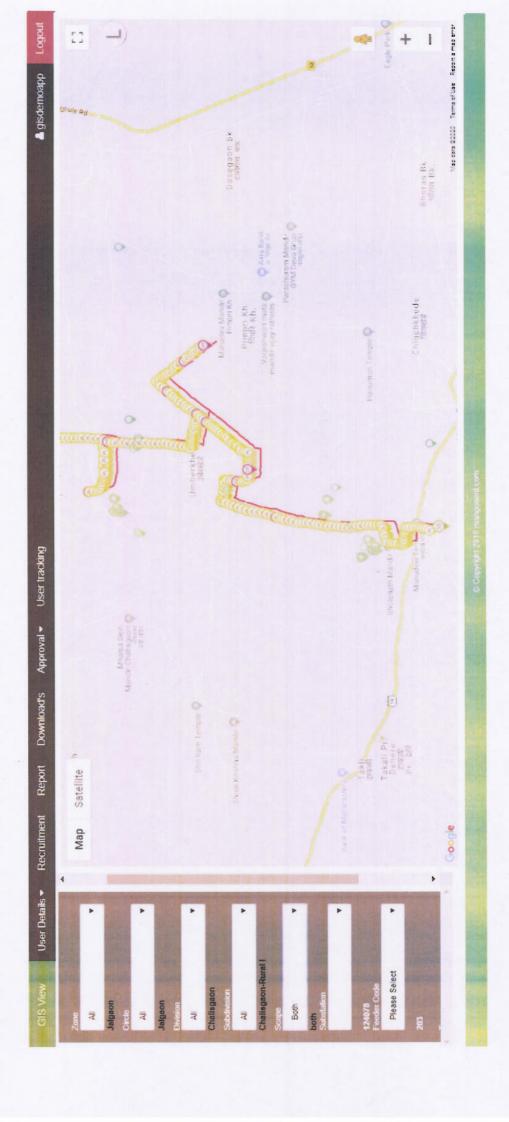
3. Annexure 3 - Town Losses of Ag dominated circles.

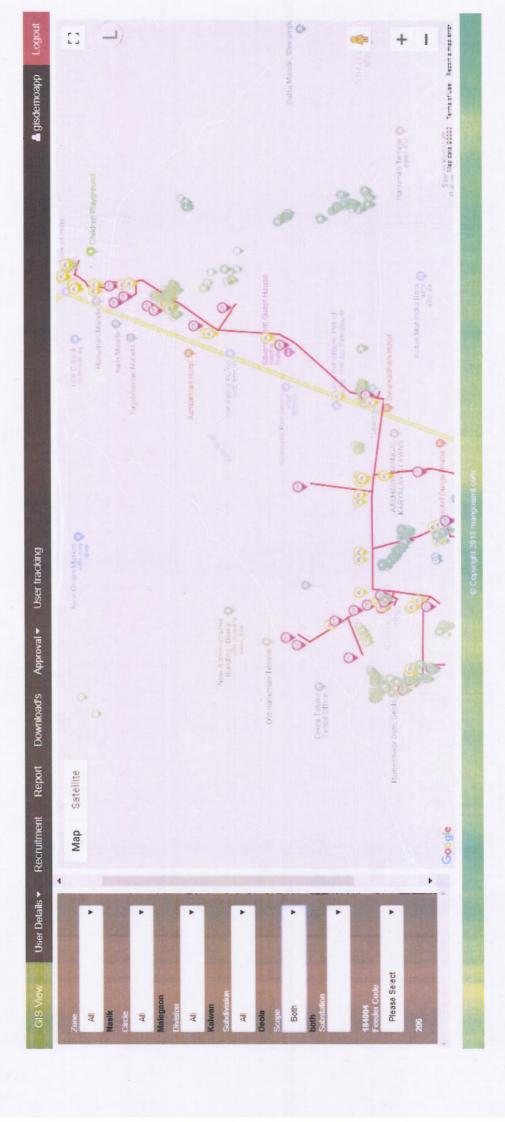
Technical Losses of 37 Nos. Sample Feeders

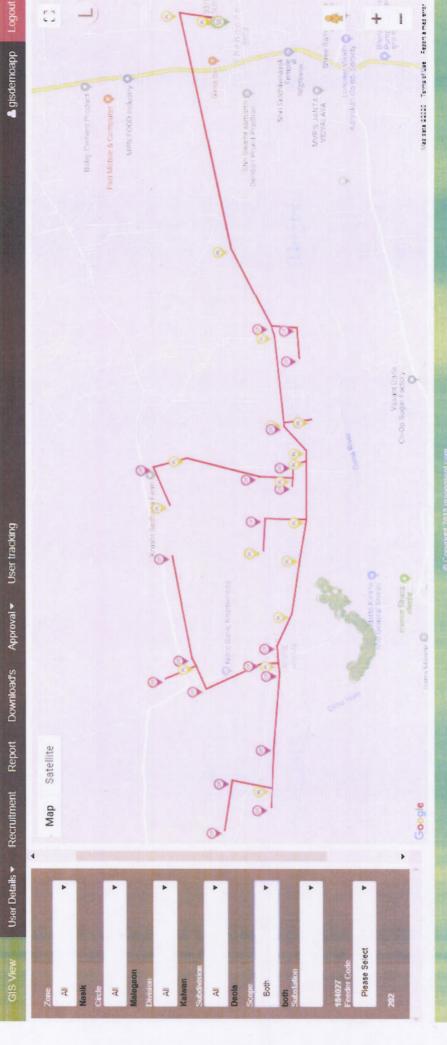
2 6	38	35	34	33	32	31	30	29	28	2/	26	25	24	2 0	2 1	3 !	21	20	اس	18	17	16	15	14	13	12	1	10	9	8	7	6	5	4) N	s -	7	SR NO
000000000000000000000000000000000000000	33 KV BORIA	JEWALI	33/11 KV SUB-STATION DHOKI	33/11 KV TINGRI	BHARAM SUB STATION	33/11 KV TALEGAON	33/11 KV MALGAON	HIRAPUR	33/11 KV KARANJAU	GAVANDGAON SUBSTATION	33/11 KV AHUKLI 5/5	IANDULWADI	JORAN	OO/ HE NA CINDINGIAL	23/11 KV/ IMARANE	VADNER RH	DFOI A	PALASPUR	33 KV S/S DAPKA	HADGAON	BHOKAR	33 KV S/S NIVALI	33KV Bheta S/S	33/11 KV KAWA	33/11 KV YEROL	33/11 KV BHALOD	33 KV GIRAD	33/11 KV KURWEL S/STN	33/11 KV KURWEL S/STN	33/11 KV ADGAON	33/11 KV NHAVI	33/11 KV GHODASGAON	33/11 KV PIMPALNER	33/11 KV DEOLA S/Stn	WADWALI	22 / IT NA WIGGROUI	33 / 11 KV Aradgaon	33/11 KV NIMON SLIB STATION	SUBSTATION NAME
1000/25	324079	194048	194010	184264	184254	184249	184244	184222	184216	184207	164207	10/15/	194090	18/07/	184064	184051	184004	174123	174110	174013	174011	154086	154065	154052	154024	124169	124120	124093	124093	124078	124048	124028	094007	004007	054140	04/120	014140	014096	SUBSTATION CODE
11 KV IS -	11 KV YEHELGAON AG	11 KV HIPPARAGA S SPP feeder	11 KV TADWALA (KOMBADWADI)	11 KV DAHIDI	11 KV BHARAM FEEDER	11KV DHAKAMBE 1	11 KV WALGAON	LI NV ORDOL AG	11 KY LIBDIII AG	THE NY DARNIER	THE REPORT OF THE PROPERTY OF	11 KV MHASHBII	11 KV ANTARVELLI	11 KV IORAN	11 KV GIRNARE-AG SDT	11KV DHONDĞAVAN	11 KV RAMESHWAR	11 KV DOLHARI	11 KV HATRAL	11 KV AMBALA	11 KV BATALA	11 KV KARKHANA	11 KV BHETA FEEDER	LIKV KAJIV NAGAK	11 KV YEROL SPP	11 KV MANUDEVI AG	11 KV BHA KHANDE	11 kV Dhanwadi AGR teeder	11 KV KURWEL AG	11 KV UMBERKHED	11 KV JINI FEEDER	11 KV GHODASGAON AG I LEDEN	11 NV DEGACIA	THE NAME OF STREET	11 KV KHADKI DEWI A AG	11KV MAIGAON AG	11 KV GANPATWADI	11 K V Palaskhade	FEEDER NAME
202	201	201			T07	202	107	201	202	203	201	201	204	201	202	202	206	203	203	201	203	107	202	202	202	202	202	2002	202	203	202	202	204	201	202	209	203	203	FEEDER CODE
4270480	1820040	2653400	1996120	4962800	1400080	4220700	03CTCC+	1951520	2705920	3594378	1655680	4427840	2945640	4022400	4984560	5269840	6232560	1604040	939492.4	3902040	7606967	200000	7505100	2227107	1563135	3475040	3475040	6190550	210000	041500	663140	1018000	2210560	7697360	2255664	3005560	5898800	2569894	INPUT KWH
56	28	28	28	20 /1	7,7	25	30	35.	40	47	29	43	42	34	56	47	48	14	24	46	1/2	57	60	21	15	0 40	40	30	30	51	18	22	36	60	56	28	33	14	NO OF DTC
2837	301	5954	2544	2577	TOOC	1300	2097	3479	1950	1528	2237	882	3850	1230	3418	2700	3569	1090	145	2914	2004	7020	3787	3055	630	1780	3244	2830	8507	2280	390	5069	2003	7175	762	3229	9024	336	HT LINE LOSS KWH
84004	50308	50202	45555	36367	1//715	54733	115300	126136	60117	97754	67863	63586	83596	115501	152907	803/6	19203P	40755	20750	3VC3E	1,0,11	117871	138114	116241	43606	76081	43299	161491	64853	95253	21252	114234	39597	209398	37229	53124	147845	69402	DTC LOSS KWH KWH
24143	1/17	17000	26971	15//19	16157	8255	8782	30637	4521	8039	10139	7127	12137	13616	19166	9237	4925/	10727	1000	4120	5007	4159	17905	40365	9744	108593	15324	7110	20689	21350	2186	72111	17138	30919	12871	31366	39127	1850	KWH KWH
110984	00/70	50200	133205	61528	165437	64289	126179	160252	66589	107321	80238	71596	99583	130348	1/5491	92313	240/17	217072	97637	40509	145847	124834	159306	159661	53980	186455	61867	171431	89799	118892	23827	191413	58738	247492	50862	87719	195996	71588	KWH
2.60	2.50	20.0	5 02	3.08	3.33	4.59	2.99	3.24	2.46	2.99	4.85	1.62	3.38	3.24	3.52	1./3	1 75	3 50	7 87	4.31	3 74	4.20	3.47	4.78	3.45	4.34	1.78	2.77	2.89	2.53	3.59	4.76	2.66	3.22	2.25	2.92	3.32	2.79	% LOSS

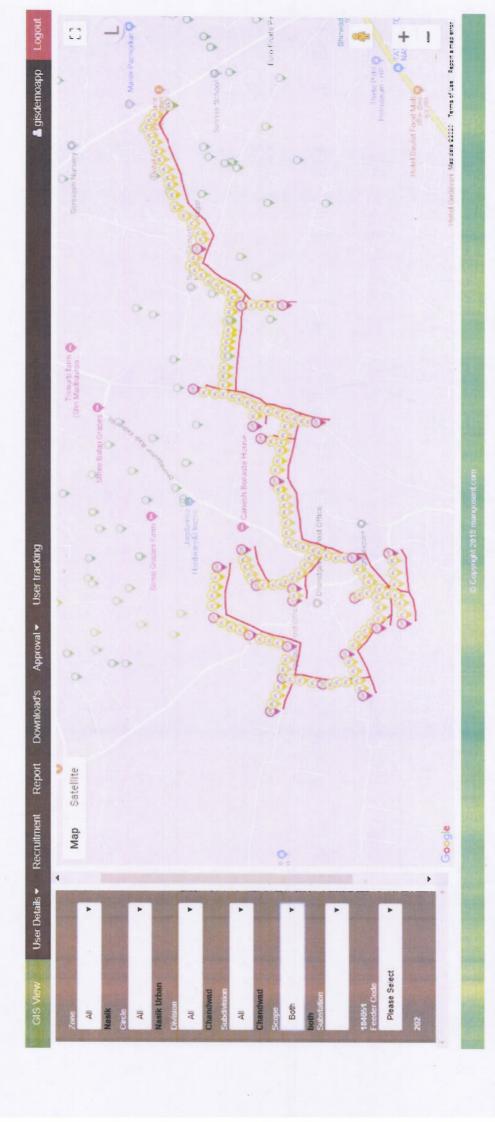
Annexure 2 GIS SLDs of 12 Feeders

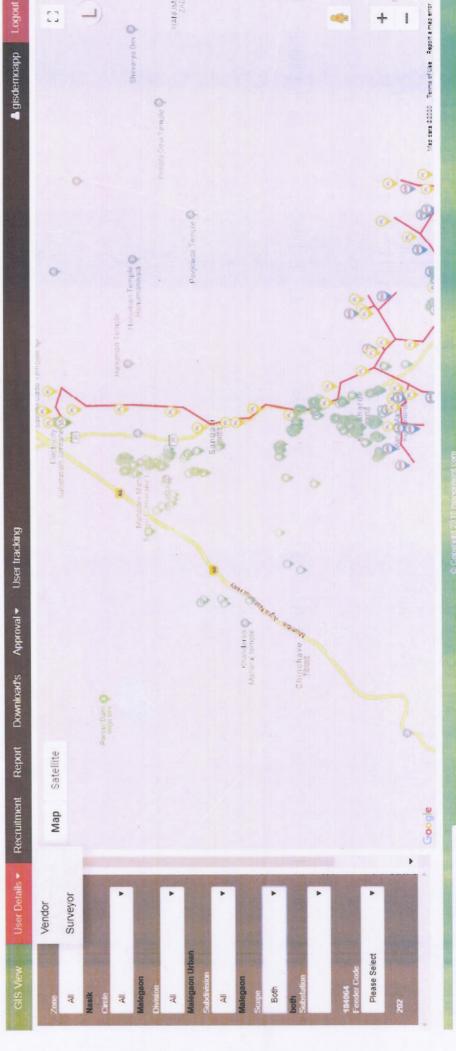




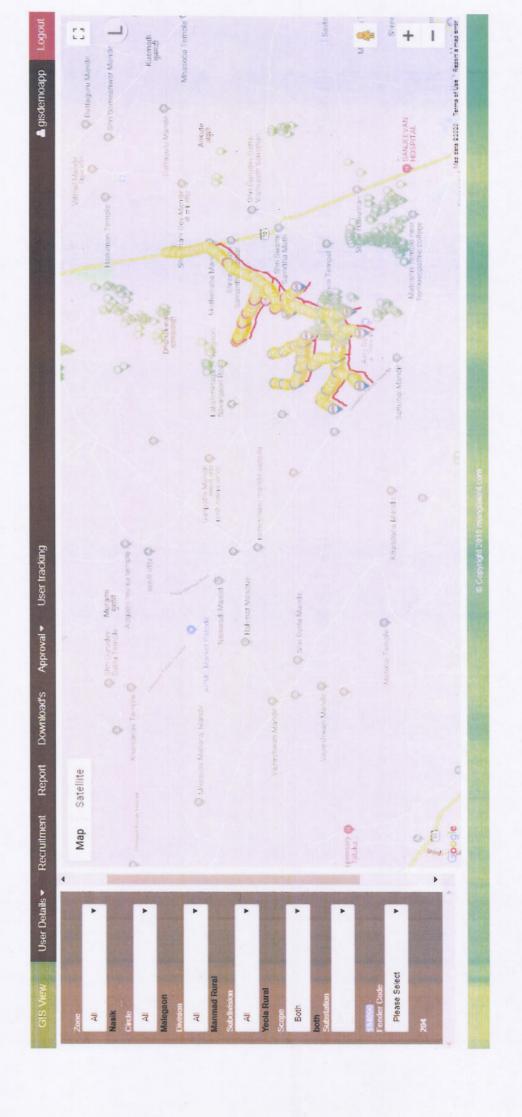


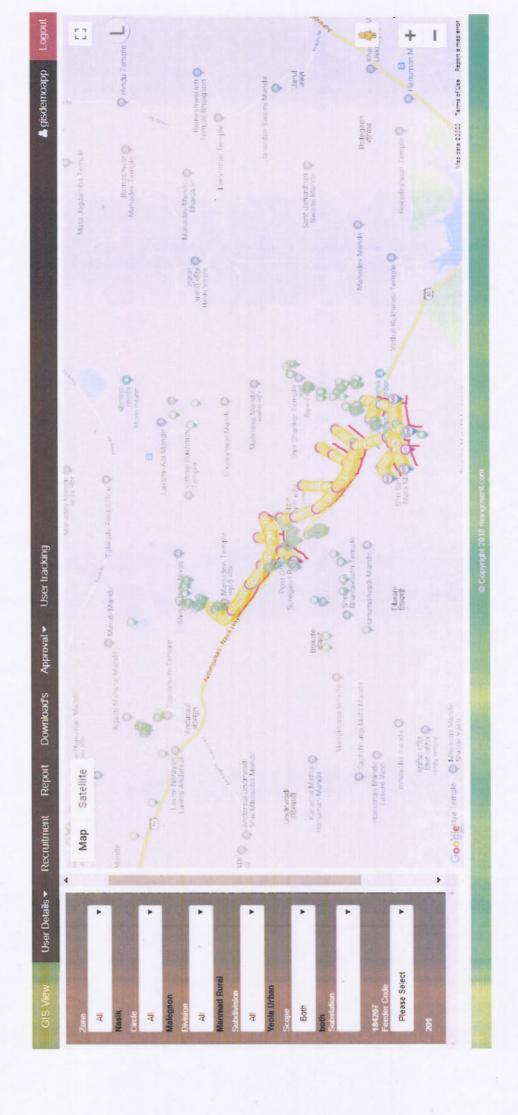


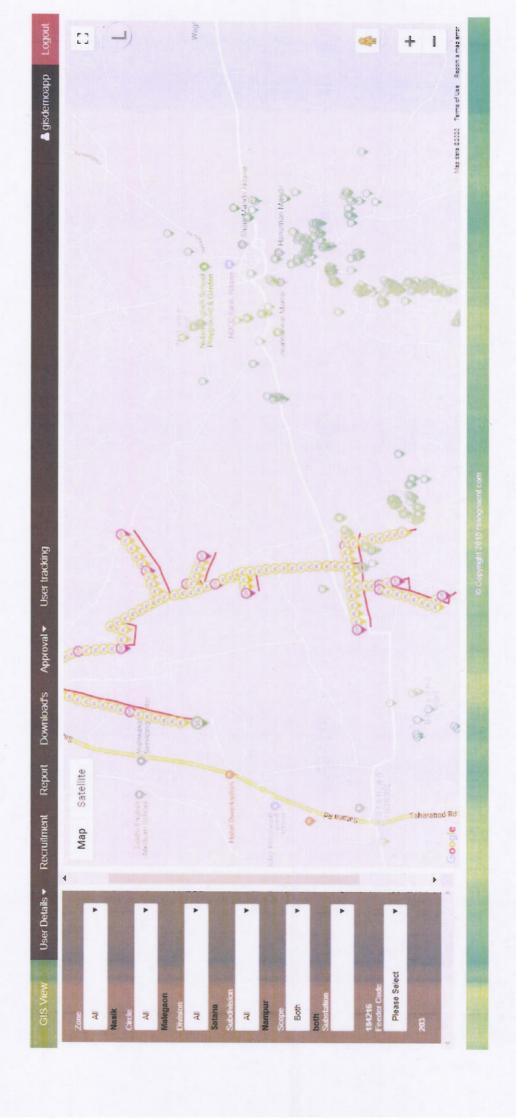


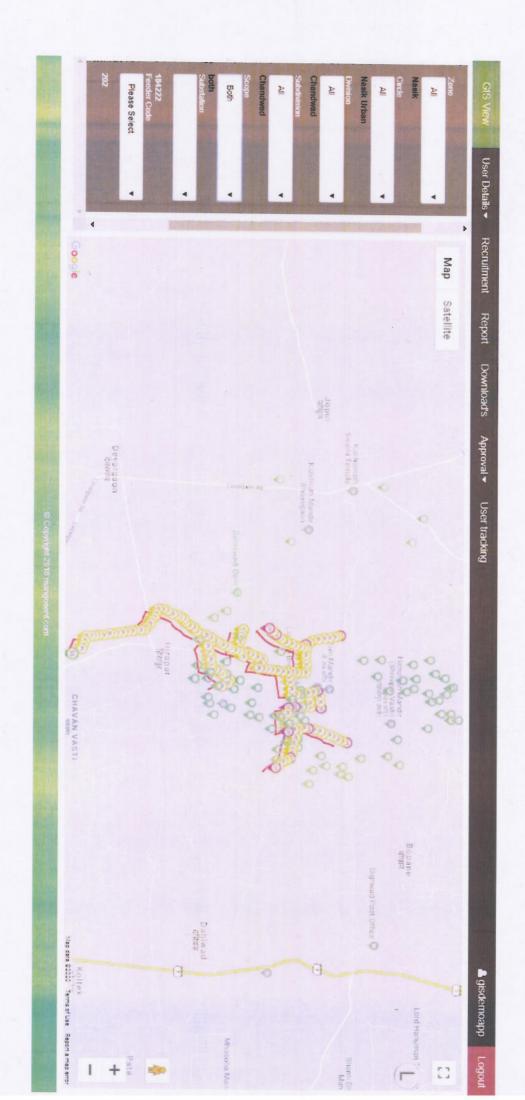


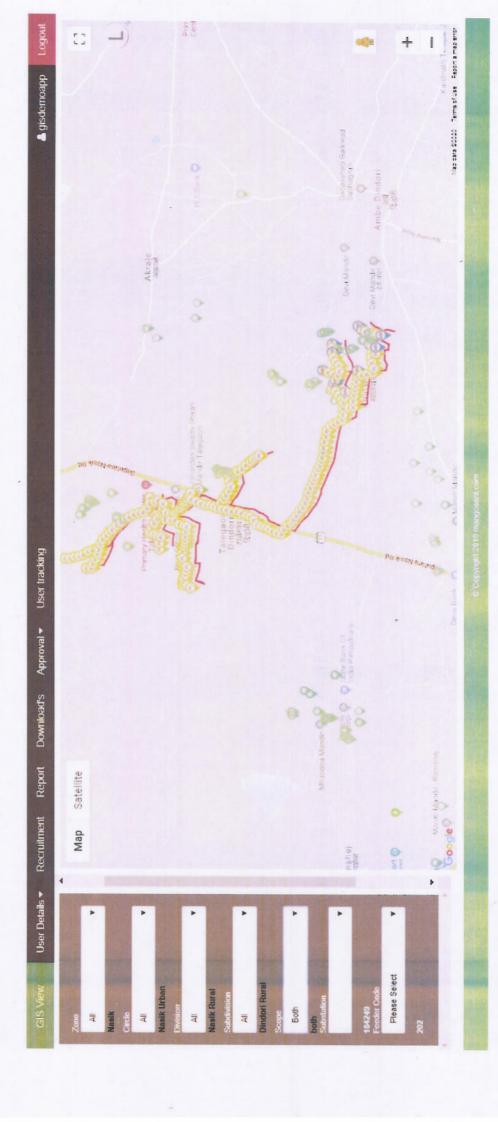
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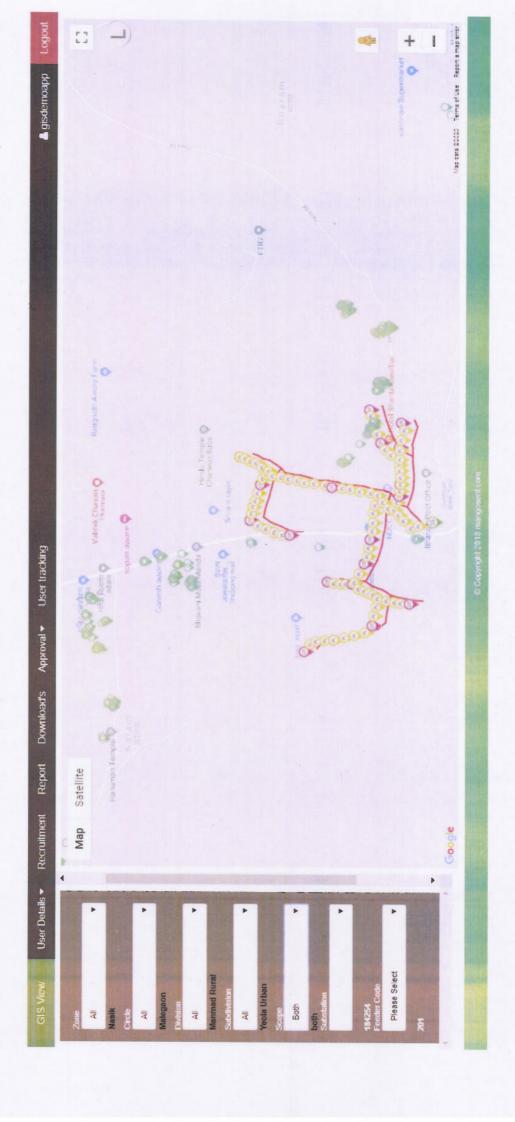












Town names of Ag Dominated Circles

Annexure 3

Sr. No.	Name of Circle	Name of town	Dist Loss %
1	LATUR CIRCLE	AHMADPUR	53.78
2	AMARAVATI CIRCLE	ANJANGAON	31.66
3	HINGOLI CIRCLE	BASMATH	64.21
4	BEED CIRCLE	BEED	50.83
5	JALGAON CIRCLE	BHUSAWAL	38.95
6	JALGAON CIRCLE	CHALISGAON	54.17
7	JALGAON CIRCLE	CHOPDA	26.21
8	JALGAON CIRCLE	DHARANGAON	43.15
9	YAVATMAL CIRCLE	DIGRAS	33.06
10	HINGOLI CIRCLE	HINGOLI	30.94
11	AURANGABAD CIRCLE	KANNAD	41.41
12	BEED CIRCLE	MAJALGAON	42.7
13	MALEGAON CIRCLE	MANMAD	37.26
14	NANDED CIRCLE	NANDED	41.92
15	LATUR CIRCLE	NILANGA	43.79
16	PARBHANI CIRCLE	PARBHANI	47.55
17	BEED CIRCLE	PARLI	44.12
18	PARBHANI CIRCLE	PATHRI	64.12
19	PARBHANI CIRCLE	PURNA	52.83
20	PARBHANI CIRCLE	SAILU	46.19
21	AURANGABAD CIRCLE	SILLOD	42.01
22	YAVATMAL CIRCLE	UMARKHED	63.39
23	SANGLI CIRCLE	URAN-ISLAMPUR	53.78
24	WASHIM CIRCLE	WASHIM	29.01