

8<sup>th</sup> December, 2017  
CREG/MUM/MERC/2017/283

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

Dear Sir,

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

- Ref: 1. MYT Order in Case No. 22 of 2016 of Tata Power-T dated 30<sup>th</sup> June, 2016  
2. Submission of Transmission Licence Amendment Application to Hon'ble Commission vide letter reference MERC/MUM/2016/267 dated 10<sup>th</sup> October, 2016  
3. Email from Hon'ble Commission on 22<sup>nd</sup> December, 2016 (Data Gap Set 1)  
4. Tata Power-T's Letter CREG/MUM/MERC/2017/32 dated 8<sup>th</sup> February, 2017 (Data Gap response Set 1 Submission)  
5. TVS session held at Office of Hon'ble Commission on 9<sup>th</sup> February, 2017  
6. Email on Data Gaps Set 2 from Hon'ble Commission on 4<sup>th</sup> August, 2017  
7. Meeting with office of Hon'ble Commission on 27<sup>th</sup> October, 2017  
8. Tata Power-T's Letter CREG/MUM/MERC/2017/255 dated 7<sup>th</sup> November, 2017 (Data Gap response Submission)

1. This has reference to the Transmission Licence Amendment Application of Tata Power-T in Case No. 137 of 2016 and our letter issued to this Hon'ble Commission dated 7<sup>th</sup> November, 2017.

2. By the present letter we wish to submit our additional submissions as set out in Appendix hereto and more particularly regarding:-

- (a) Exclusion of 2 nos. 110 kV Trombay – BARC feeders from our transmission assets. The same were inadvertently submitted as our transmission assets in our submissions dated 7<sup>th</sup> November, 2017.

*Sent*  
*8-12-17*  
OFFICE OF THE  
MAHARASHTRA ELECTRICITY  
REGULATORY COMMISSION  
COLABA, MUMBAI - 400 005

TATA POWER

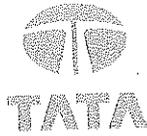
The Tata Power Company Limited

Backbay Receiving Station, Regulation Department 148 Lt Gen J Bhonsale Marg Nariman Point Mumbai - 400 028 Page 1 of 7

Tel 91 22 6717 2903

Registered Office Bombay House 24 Homi Mody Street Mumbai 400 001

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- (b) Placing/ Shifting of 4 nos. 110 kV Western Railway feeders from the heading "110 kV feeders to Direct Consumers" (as mentioned in item no. 77) to "Existing Transmission Lines".
3. Please refer to the **Appendix** for our detailed additional submissions.
  4. We request this Hon'ble Commission to take our additional submissions on record and consider the same while issuing the amendment to the Transmission Licence no. 1 of 2014 of Tata Power-T.

Thanking You,

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Bhaskar Sarkar', written over a faint circular stamp.

**Bhaskar Sarkar**  
Head - Regulatory

**Encl: Appendix**

**Additional Submission in Transmission Licence Amendment Application of Tata Power-T in  
Case No. 137 of 2016**

1. The present Appendix be considered as a part of (in addition to) Tata Power-T's submissions dated 10<sup>th</sup> October, 2016 and 7<sup>th</sup> November, 2017, the contents of which are not being reiterated for the sake of brevity and to avoid prolixity.
2. Tata Power-T has filed an application for amendment of its Transmission Licence No. 1 of 2014 in Case No. 137 of 2016. As the Hon'ble Commission is aware, the Transmission Licence has been granted to Tata Power-T line and bay wise. The amendment in the Transmission Licence has been sought with respect to certain additions, deletions, modifications and corrections required in the Lines and Bays listed in the Transmission Licence.
3. Further to our application dated 10<sup>th</sup> October, 2016 and 7<sup>th</sup> November, 2017, we wish to make an additional submission seeking the following amendment in the Transmission Licence, in addition to the amendments already sought in our original application.
4. In the Transmission Licence granted to Tata Power-T, under the section "Existing Transmission Lines" item no. 77 lists "110 kV feeders to Direct Consumers" wherein 8 lines have been listed as direct feeds to consumer premises. The item 77 from the "Existing Transmission Lines" is reproduced below for the sake of convenience:

77. 110 kV feeders to Direct Consumers (10.91 km):

- a. 110 kV Borivali – W Railway 1 feeder (2.70 km)
- b. 110 kV Borivali – W Railway 2 feeder (2.70 km)
- c. 110 kV Malad – W Railway 1 feeder (0.15 km)
- d. 110 kV Malad – W Railway 2 feeder (0.15 km)
- e. 110 kV Trombay – HPCL 1 feeder (1.90 km)
- f. 110 kV Trombay – HPCL 2 feeder (1.90 km)
- g. 110 kV Trombay – BARC 3 feeder (0.65 km)
- h. 110 kV Trombay – BARC 4 feeder (0.65 km)

5. The original application for amendment of Transmission Licence, includes removing item e) 110 kV Trombay – HPCL 1 feeder (1.90 km) and f) 110 kV Trombay – HPCL 2 feeder (1.90 km) from the Transmission Licence as these assets actually belong to Distribution Business of Tata Power and were inadvertently included in the Transmission Licence. The detailed explanation for this request for amendment is part of our original application and is not reproduced herein for the sake of brevity.
6. The Hon'ble Commission in a separate proceeding in Case No. 58 of 2017 (vide its Daily Order dated 05.10.2017), had raised a query regarding the correct regulatory treatment for all lines listed under item 77 as they fall under the same category of "110 kV feeders to direct consumers". This Hon'ble Commission had further enquired whether any further amendment is required to the Transmission Licence for regularising the existing arrangements, as per the provisions of law.
7. Accordingly, Tata Power-T has re-examined all the lines as listed under item 77 and thereafter wish to make the following submissions in response to this Hon'ble Commission's concern as stated above.

**Re: Items 77a to 77d**

8. The Lines mentioned under items 77a and 77b are transmission lines emanating from our Borivali Receiving Station, whereas Lines under items 77c and 77d emanate from

our Malad Receiving Station. All the four lines are utilised for providing power supply to Western Railway. The 110 kV breakers at Borivali Receiving Station end and Malad Receiving Station end are part of the existing Transmission Licence and are listed as item nos. 11 and 20 under the heading "Existing Bays at Sub-stations."

9. As this Hon'ble Commission is aware, Indian Railways was a consumer of Tata Power-D, in Mumbai, till 2<sup>nd</sup> February, 2016. However, the Hon'ble CERC, by its Order dated 5<sup>th</sup> November, 2015 in Case No. 197/MP/2015, has granted a Deemed Distribution Licensee status to Indian Railways. Therefore, from 5<sup>th</sup> November, 2015, Indian Railways has ceased to be a consumer of Tata Power-D.
10. Accordingly, the Lines mentioned at items "77a" to "77d" no longer feed TPC-D's consumers, but feeds a Deemed Distribution Licensee viz. Indian Railways. Hence, these Lines "77a" to "77d" continue to be a part of Transmission Licence. However, these would be required to be shifted under **"item no. 76 – 110 kV Feeders to Discoms."**
11. Considering the above submission, we request the Hon'ble Commission to amend the Transmission Licence to shift the Transmission Lines mentioned in "77a" to "77d" as item nos. "76h" to "76k" under "110 kV Feeders to Discoms."

**Re: Items 77e to 77f**

12. As already explained above, Tata Power-T has already sought an amendment in the original application for removing lines 77(e) to (f) [Supplying to HPCL] from the Transmission Licence and wishes to continue with the same submission as per the reasons explained in the original application. In this regard, Tata Power-T also wishes to rely upon Tata Power-D's submission in Case No. 58 of 2017.

**Re: Items 77g to 77h**

13. The Lines set out under items "77g" to "77h", emanating from the Trombay

Generating Station belong to the Generation Business of Tata Power. These two Lines are short length lines starting from the 110 kV switchyard at Trombay Generating Station (110 kV Bays for these Lines are part of the Generation Business of Tata Power) and laid upto the gantry just outside the boundary of Trombay Generating Station. Further, from the gantry these Lines are extended to the consumer of the Distribution Business of Tata Power – i.e., Bhabha Atomic Research Centre (BARC). The 110 kV Lines from the gantry to BARC are owned by BARC itself and do not form part of the asset of any of the Businesses of Tata Power as also do not form part of the Transmission License. It may be noted that, this is an historical arrangement continuing from around 1955-60.

14. Considering the above layout, the purpose of the short length lines “77g” and “77h” starting from 110 kV switchyard at Trombay Generating Station upto the gantry just outside the boundary of Trombay Generating Station is to provide power supply to a consumer. It is a settled law that the classification of lines into distribution or transmission is not as per its voltage level, but as per its purpose and intent. Further, any line connecting to a consumer’s premises is a part of the distribution system of the distribution licensee. Hence, item “77g” and “77h” i.e. 110 kV Trombay-BARC 3 Feeder and 110 kV Trombay-BARC 4 Feeder are part of the Distribution System and cannot be a part of the Transmission Licence.
15. Accordingly, lines set out under items “77g” and “77h” need to be regularised, and we humbly request this Hon’ble Commission to amend the Transmission Licence to remove the said Lines from the Transmission Licence.
16. In addition to the above, we humbly submit and clarify that, in the data gap response dated 7<sup>th</sup> November, 2017, wherein Tata Power-T has submitted the details of Transmission bays associated with the transmission lines along with its status of ownership, maintenance and O&M entitlement, it has inadvertently submitted that, the 0.65 km 110 kV Trombay - BARC 3 feeder and 0.65 km 110 kV Trombay - BARC 4 feeder are owned by Tata Power-T. It is clarified that, the said Lines under item “77g”

and "77h" are part of the Tata Power's Generation asset and not part of the Transmission asset in anyway. With respect to regularising the said asset under the appropriate business i.e., the Distribution Business of Tata Power, it is stated that Tata Power will take up the same in the MTR filings of the respective businesses.

17. Considering all the above submissions, we request the Hon'ble Commission to grant the following additional amendments in the Transmission Licence of Tata Power - T:
  - a.) To shift the Transmission Lines "110 kV Borivali – W. Railway 1 Feeder", "110 kV Borivali – W. Railway 2 Feeder", "110 kV Malad – W. Railway 1 Feeder", "110 kV Malad – W. Railway 2 Feeder" (Item "77a" to "77d") under "110 kV Feeders to Discoms." (Item "76h" to "76k")
  - b.) To remove Lines "110 kV Trombay-BARC 3 Feeder" and "110 kV Trombay-BARC 4 Feeder" (Item "77g" and "77h") from the Transmission Licence.
18. Tata Power craves leave to file further submissions, if the need so arises.