

Executive Summary

1 Overview

M/s KRC Infrastructure and Projects Private Limited (hereinafter referred to as "KRCIPPL" or "the Petitioner") is a Company incorporated under the provisions of the Companies Act, 1956, having its registered office at Plot No. C-30, Block 'G', Opp. SIDBI, Bandra Kurla Complex, Bandra (E), Mumbai – 400 051, Maharashtra, India.

KRCIPPL and GERA have been jointly notified as the Developer of the SEZ by the Ministry of Commerce & Industry (Department of Commerce) vide Notification No. S.O. 2203 (E) dated 19 June, 2017 and are jointly developing the said IT & ITeS SEZ.

Further, GERA issued a No Objection Certificate (NOC) to KRCIPPL undertaking the power distribution business and hence, the Hon'ble Commission, after taking cognizance of the Notification issued by Ministry of Commerce and Industry and following the due regulatory process, took on record KRCIPPL's status as a deemed Distribution Licensee for Kharadi SEZ area vide Order dated 25 June, 2018 in Case No. 75 of 2018. The Hon'ble Commission notified the Specific Conditions of Distribution Licence for KRCIPPL on 27 September, 2018.

1.1 Filing of Present Petition under MERC MYT Regulations, 2019

KRCIPPL is filing the Mid-Term Review in accordance with Regulation 5.1 (b) of the MERC MYT Regulations, 2019. Accordingly, the Petitioner is hereby filing its MTR Petition requesting for approval of:

- a) Truing up for FY 2019-20 in accordance with the provisions of MERC MYT Regulations, 2015;
- b) Truing up for FY 2020-21 and FY 2021-22 in accordance with the provisions of MERC MYT Regulations, 2019;
- c) Provisional True up for FY 2022-23, in accordance with the provisions of the MERC MYT Regulations, 2019;
- d) Revised ARR for FY 2023-24 and FY 2024-25, in accordance with MERC MYT Regulations, 2019;



- e) Revenue from sale of power at existing Tariffs and projected Revenue Gap/(Surplus) for FY 2023-24 and FY 2024-25, in accordance with MERC MYT Regulations, 2019; and
- f) Proposed category-wise Tariff for FY 2023-24 and FY 2024-25, in accordance with MERC MYT Regulations, 2019.



2 Truing-up of FY 2019-20, FY 2020-21, and FY 2021-22

The Petitioner has considered the Truing-up of FY 2019-20 in line with the provision of MYT Regulations, 2015, as amended from time to time. The Petitioner has considered the Truing-up of FY 2020-21 and FY 2021-22 in line with the provision of MYT Regulations, 2019, as amended from time to time. The following Table shows the summary of ARR for Truing-up of FY 2019-20, FY 2020-21 and FY 2021-22:

Table 1: ARR Summary for Wires Business for FY 2019-20, FY 2020-21 and FY 2021-22 (Rs. Crore)

C.		FY 2019-20		FY 2	020-21	FY 2021-22		
Sr. No.	Particulars	MYT	Actual for	MYT	Actual for	MYT	Actual for	
NO.		Order	Truing up	Order	Truing up	Order	Truing up	
1	O&M Expenses	0.675	0.74	0.745	0.76	0.767	0.71	
2	Depreciation	0.381	0.52	0.924	1.05	1.252	1.17	
3	Interest on Loan Capital	0.450	0.65	1.055	1.11	1.357	0.96	
4	Interest on Working Capital	0.00	0.00	0.046	0.04	0.062	0.04	
5	Interest on CSD	0.006	0.01	0.008	0.01	0.010	0.01	
6	Provision for bad and doubtful debts	0.00	0.00	0.000	0.00	0.000	0.00	
7	Contribution to Contingency Reserves	0.00	0.00	0.072	0.08	0.103	0.11	
8	Income Tax	0.00	0.00					
9	Sharing of Gains/(Losses)		(0.01)		0.01		0.03	
	Impact of restatement of O&M expenses based on share of sales of KRC DISCOMs				0.05		0.29	
10	Total Revenue Expenditure	1.512	1.92	2.850	3.10	3.550	3.31	
11	Add: Return on Equity Capital	0.336	0.46	0.735	0.93	0.996	1.05	
11	Aggregate Revenue Requirement	1.848	2.38	3.585	4.03	4.546	4.36	
12	Less: Non-Tariff Income	0.00	0.00	0.000	0.00	0.002	0.00	
13	Total ARR	1.848	2.38	3.585	4.03	4.543	4.36	



Table 2: ARR Summary for Retail Supply Business for FY 2019-20, FY 2020-21 and FY 2021-22 (Rs. Crore)

Sr.		FY	2019-20	FY 2020-21		FY 2020-21		FY	2021-22
No.	Particulars	MYT Order	Actual for Truing up	MYT Order	Actual for Truing up	MYT Order	Actual for Truing up		
1	Power Purchase Expenses	2.111	3.19	12.833	4.09	16.321	5.90		
2	O&M Expenses	0.364	0.40	0.401	0.41	0.413	0.39		
3	Depreciation	0.017	0.01	0.055	0.02	0.086	0.03		
4	Interest on Loan Capital	0.004	0.002	0.012	0.01	0.017	0.005		
5	Interest on Working Capital	-	-	0.00	0.04	0.000	0.05		
6	Interest on CSD	0.057	0.08	0.069	0.11	0.092	0.11		
7	Provision for bad and doubtful debts	-	-	0.00	0.00	0.000	0.00		
8	Contribution to Contingency Reserves	-	-	0.001	0.00	0.002	0.00		
9	Intra-State Transmission Charges	0.122	-	1.595	1.55	1.579	1.54		
10	MSLDC Fees & Charges	0.069	-	0.008	0.01	0.007	0.01		
11	Income Tax	-							
12	Sharing of Gains/(Losses)		(0.01)		(0.03)		(0.03)		
	Impact of restatement of O&M expenses based on share of sales of KRC DISCOMs				0.02		0.15		
13	Total Revenue Expenditure	2.745	3.68	14.974	6.23	18.518	8.15		
14	Add: RoE	0.004	0.01	0.012	0.01	0.020	0.01		
15	Aggregate Revenue Requirement	2.749	3.68	14.986	6.23	18.538	8.16		
16	Less: Non-Tariff Income	0.044	0.00	0.266	0.02	0.339	0.01		
17	Aggregate Revenue Requirement from Retail Supply	2.705	3.68	14.720	6.22	18.199	8.15		

The Revenue Gap/(Surplus) for FY 2019-20, FY 2020-21 and FY 2021-22 based on the above ARR and actual revenue for respective years, is shown in the Table below:



Table 3: Revenue Gap/(Surplus) for FY 2019-20, FY 2020-21 and FY 2021-22 (Rs. Crore)

Sr.		FY	2019-20	FY 2020-21		FY 2021-22	
No.	Particulars	MYT Order	Actual for Truing up	MYT Order	Actual for Truing up	MYT Order	Actual for Truing up
1	ARR for Distribution Wires Business	1.85	2.38	3.59	4.03	4.54	4.36
2	ARR for Retail Supply Business	2.70	3.68	14.72	6.22	18.20	8.15
3	Combined ARR for Wires and Retail Supply Business	4.55	6.06	18.30	10.24	22.74	12.51
4	Revenue from Wheeling Charges		0.23		1.28		1.71
5	Revenue from sale of electricity		8.16		8.37		10.61
6	Total Revenue		8.39		9.66		12.32
7	Gap/(Surplus of Wires Business		2.15		2.74		2.65
8	Gap/(Surplus of Supply Business		(4.48)		(2.16)		(2.46)
9	Combined Revenue Gap/(Surplus)		(2.33)		(0.67)		0.19

The Petitioner requests the Hon'ble Commission to approve the Revenue Gap/(Surplus) after truing up for FY 2019-20, FY 2020-21 and FY 2021-22, as shown in the above Tables. Further, considering the peculiar circumstances under which the Revenue Gap has been generated, viz., combination of lower sales due to COVID-19 impact, lower tariffs due to deferment of revenue requirement, recovery of fixed Wires ARR through variable sales units, which have declined sharply, etc., the Petitioner requests the Hon'ble Commission to consider the combined Revenue Gap of the Wires Business and Supply Business, rather than separately.



3 Provisional Truing-up of FY 2022-23

The Petitioner has computed the Provisional Truing-up requirement of FY 2022-23 in line with the provision of MYT Regulations, 2019 as amended from time to time. The following Table shows the summary of ARR for Provisional Truing-up of FY 2022-23:

Table 4: ARR Summary for Wires Business for FY 2022-23 (Rs. Crore)

Sr.		FY 20)22-23	
No.	Particulars	MYT	Provisional	
140.		Order	Truing up	
1	Operation & Maintenance Expenses	0.788	0.75	
2	Depreciation	1.585	1.30	
3	Interest on Loan Capital	1.633	0.99	
4	Interest on Working Capital	0.075	0.08	
5	Interest on deposit from Distribution	0.012	0.01	
	System Users	0.012	0.01	
6	Provision for bad and doubtful debts	0.000	0	
7	Contribution to Contingency Reserves	0.134	0.12	
8	Income Tax			
9	Total Revenue Expenditure	4.228	3.25	
10	Add: Return on Equity Capital	1.260	1.05	
11	Aggregate Revenue Requirement	5.489	4.30	
12	Less: Non-Tariff Income	0.008	0.00	
13	Total Aggregate Revenue Requirement	5.480	4.29	

Table 5: ARR Summary for Retail Supply Business for FY 2022-23 (Rs. Crore)

Sr.		FY 2022-23			
No.	Particulars	MYT Order	Provisional Truing up		
1	Power Purchase Expenses (including	18.780	17.16		
1	Inter-State Transmission Charges)	10.700	17.10		
2	Operation & Maintenance Expenses	0.424	0.41		
3	Depreciation	0.101	0.05		
4	Interest on Loan Capital	0.018	0.01		
5	Interest on Working Capital	0.000	0.08		



Sr.		FY 202	2-23
No.	Particulars	MYT Order	Provisional Truing up
6	Interest on Consumer Security Deposit	0.110	0.01
7	Provision for bad and doubtful debts	0.000	0.03
8	Contribution to Contingency Reserves	0.003	0.00
9	Intra-State Transmission Charges	2.653	2.62
10	MSLDC Fees & Charges	0.013	0.01
11	Income Tax	-	-
12	Total Revenue Expenditure	22.103	20.38
13	Add: Return on Equity Capital	0.027	0.02
14	Aggregate Revenue Requirement	22.130	20.39
15	Less: Non-Tariff Income	0.390	0.01
16	Aggregate Revenue Requirement from Retail Supply	21.741	20.38

The Revenue Gap/(Surplus) based on provisional true-up for FY 2019-20 is shown in the Table below:

Table 6: Revenue Gap/(Surplus) for FY 2022-23 (Rs. Crore)

Sr.	Particulars	FY 2022-23			
No.	1 atticulars	MYT Order	Estimated		
1	ARR for Distribution Wires Business	5.480	4.29		
2	ARR for Retail Supply Business	21.741	20.38		
3	Combined ARR for Wires and Retail	27.221	24.67		
	Supply Business				
4	Revenue from sale of electricity		19.97		
5	Revenue Gap/(Surplus)		4.71		

The Petitioner requests the Hon'ble Commission to approve the Revenue Gap/(Surplus) after provisional true-up for FY 2022-23, as shown in the above Tables.



4 Revised ARR for FY 2023-24 and FY 2024-25

The Petitioner has projected the revised ARR for FY 2023-24 and FY 2024-25 in line with Regulation 5.1 (iii) of MYT Regulations, 2019. The following Tables show the summary of revised ARR for FY 2023-24 and FY 2024-25:

Table 7: ARR Summary for Wires Business for FY 2023-24 and FY 2024-25 (Rs. Crore)

Sr.		FY 20	23-24	FY 2024-25	
No.	Particulars	MYT	Projecte	MYT	Projecte
110.		Order	d	Order	d
1.	Operation & Maintenance Expenses	0.811	0.79	0.834	0.83
2.	Depreciation	1.754	1.48	1.756	1.66
3.	Interest on Loan Capital	1.686	1.06	1.527	1.12
4.	Interest on Working Capital	0.086	0.09	0.083	0.10
5.	Interest on Deposit from Consumers and	0.013	0.01	0.013	0.01
	Distribution System Users	0.013	0.01	0.013	0.01
6.	Contribution to contingency reserves	0.166	0.120	0.166	0.16
7.	Total Revenue Expenditure	4.515	3.55	4.379	3.87
8.	Add: Return on Equity Capital	1.395	1.20	1.397	1.34
9.	Aggregate Revenue Requirement	5.910	4.75	5.776	5.22
10.	Less: Non-Tariff Income	0.017	0.00	0.027	0.00
11.	Aggregate Revenue Requirement from	5.893	4.75	5.750	5.22
	Distribution Wires				

Table 8: ARR Summary for Retail Supply Business for FY 2023-24 and FY 2024-25 (Rs. Crore)

Sr.		FY 20	23-24	FY 2024-25	
No.	Particulars	MYT	Projecte	MYT	Projecte
140.		Order	d	Order	d
1.	Power Purchase Expenses	19.558	16.04	20.272	16.24
2.	Operation & Maintenance Expenses	0.436	0.43	0.449	0.45
3.	Depreciation	0.101	0.09	0.074	0.10
4.	Interest on Loan Capital	0.016	0.02	0.011	0.03
5.	Interest on Working Capital	0.000	0.07	0.000	0.08



Sr.		FY 20	23-24	FY 2024-25	
No.	Particulars	MYT	Projecte	MYT	Projecte
140.		Order	d	Order	d
6.	Interest on Consumer Security Deposit	0.116	0.01	0.118	0.01
7.	Write-off of bad and doubtful debts	0.000	0.00	0.000	0.00
8.	Contribution to contingency reserves	0.003	0.00	0.004	0.00
9.	Intra-State Transmission Charges	2.770	2.62	2.851	2.62
10.	MSLDC Fees & Charges	0.015	0.01	0.015	0.01
11.	Total Revenue Expenditure	23.014	19.30	23.794	19.54
12.	Add: Return on Equity Capital	0.032	0.03	0.034	0.04
13.	Aggregate Revenue Requirement	23.046	19.33	23.828	19.58
14.	Less: Non-Tariff Income	0.406	0.01	0.421	0.01
15.	Less: Income from other business	-	-	-	-
16.	Aggregate Revenue Requirement from	22.640	19.31	23.407	19.57
	Retail Supply	22.040	19.31	43.40 /	19.37

The Petitioner has computed carrying/(holding cost) on Revenue Gap/(Surplus) of FY 2019-20, FY 2020-21, and FY 2021-22 to be passed on in the tariff of FY 2023-24 and FY 2024-25, as shown in the Table below:

Table 9: Carrying/(Holding) Cost for Past Gaps/(Surplus) (Rs. Crore)

Particulars	FY 2019-20	FY 2020-21	FY 2021-22	FY 2022-23	FY 2023-24	Total
Opening						
Incremental	-	(1.07)	(1.75)	(1.55)	(1.55)	
Gap/(Surplus)						
Incremental						
Gap/(Surplus)	(1.07)	(0.67)	0.19		-	
during the year						
Closing	(1.07)	(1.75)	(1 EE)	(1 EE)	(1 EE)	
Gap/(Surplus)	(1.07)	(1.75)	(1.55)	(1.55)	(1.55)	
Average	(0.54)	(1.41)	(1.65)	(1.55)	(1.55)	
Gap/(Surplus)	(0.34)	(1.41)	(1.65)	(1.55)	(1.55)	
Interest Rate for						
Carrying/(Holding)	9.66%	8.57%	8.50%	9.55%	9.55%	
Cost						
Carrying/(Holding)	(0.05)	(0.12)	(0.14)	(0.15)	(0.15)	(0.61)
Cost for the Year	(0.03)	(0.12)	(0.14)	(0.15)	(0.13)	(0.61)



5 Tariff Proposal for FY 2023-24 and FY 2024-25

Based on the above computations of Revenue Gap/(Surplus) after true-up of previous years, and the projected Revenue Gap/(Surplus) for FY 2023-24 and FY 2024-25, the Petitioner has proposed the recovery/adjustment in FY 2023-24 and FY 2024-25.

Overall Revenue Gap/(Surplus) proposed for recovery in FY 2023-24 and FY 2024-25

The overall projected Revenue Gap/Surplus) based on projected ARR and Revenue from existing tariff for FY 2023-24 and FY 2024-25 is summarised in the Table below:

Table 10: Projected Revenue Gap/(Surplus) at existing Tariff for FY 2023-24 and FY 2024-25 (Rs. Crore)

Sr. No.	Particulars	FY 2023- 24	FY 2024- 25
1.	ARR for Distribution Wires Business	4.75	5.22
2.	ARR for Retail Supply Business	19.31	19.57
3.	ARR for Combined Wires Business & Retail Supply Business	24.07	24.78
4.	Add: Incremental Revenue Gap/(Surplus) for FY 2019-20	(1.07)	
5.	Add: Revenue Gap/(Surplus) for FY 2020-21	(0.67)	
6.	Add: Revenue Gap/(Surplus) for FY 2021-22	0.19	
7.	Add: Carrying/(Holding) Cost for Revenue Gap/(Surplus) of FY 2019-20, FY 2020-21, and FY 2021-22	(0.61)	
8.	Add: Revenue Gap/(Surplus) for FY 2022-23	1.18	3.53
9.	Total Revenue Requirement	23.08	28.31
10.	Revenue from existing tariff	20.44	21.17
11.	Revenue Gap of Licensed Business	2.65	7.14

From the above Table, it is observed that there is a Revenue Gap for FY 2023-24 and FY 2024-25, as the revenue at the existing tariff is lower than the ARR of the Wires Business and Supply Business. Hence, the tariff is required to be increased in order to recover the ARR of the Wires Business and Supply Business. As stated earlier, the Petitioner has proposed category-wise tariffs for FY 2023-24 and FY 2024-25, to realise the revised Net ARR computed in the Table above.



The following Table shows the Projected Revenue Requirement considered for recovery and Average Cost of Supply for FY 2023-24 and FY 2024-25:

Table 11: Projected Revenue Requirement and ACoS for FY 2023-24 and FY 2024-25 (Rs. Crore)

Sr. No.	Particulars	FY 2023-24	FY 2024-25
1.	Net ARR of Licensed Business	23.08	28.31
2.	Energy Sales (MkWh)	27.34	28.71
3.	Energy Sales (MkVAh)	28.51	29.94
4.	Average Cost of Supply (Rs./kWh)	8.44	9.86
5.	Average Cost of Supply (Rs./kVAh)	8.09	9.46

The Wheeling Charges have been proposed in accordance with the approach followed by the Hon'ble Commission in the MYT Order, such that the entire Wires ARR is recovered from the Wheeling Charges. The Retail Supply Tariff, i.e., Fixed/Demand Charges and Energy Charges, have been proposed accordingly, to recover the balance part of the composite ARR projected for the Control Period.

Table 12: Proposed Wheeling Charges for FY 2023-24 and FY 2024-25

Sr.	Particulars	FY 2023-24	FY 2024-25
No.			
1.	Wires ARR (Rs. Crore)	4.75	5.22
2.	GFA attributable to HT Network (%)	42.00%	42.00%
3.	GFA attributable to LT Network (%)	58.00%	58.00%
4.	Charge recoverable from HT consumers (Rs. Crore)	2.00	2.19
5.	Charge recoverable from LT consumers (Rs. Crore)	2.76	3.03
6.	Total HT Sales (MkVAh)	22.44	23.56
7.	Total LT Sales (MkVAh)	6.08	6.38
8.	Charge recoverable from HT consumers (Rs. Crore)	1.57	1.72
9.	Charge recoverable from LT consumers (Rs. Crore)	3.18	3.49
10.	HT Wheeling Charge (Rs./kVAh)	0.70	0.73
11.	LT Wheeling Charge (Rs./kVAh)	5.24	5.48



Sr.	Particulars	FY 2023-24	FY 2024-25
No.			
12.	Composite Wheeling Charges (Rs/kVAh)	1.67	1.74

As can be seen from the above computation, the LT Wheeling Charges, if computed separately, are working out to be very high, on account of the very low share of sales (21%) as against share of 58% of the Wires ARR. Hence, the Petitioner requests the Hon'ble Commission to consider the composite (HT and LT combined) Wheeling Charges in case of the Petitioner.

The following Tables shows the category-wise Tariffs proposed by the Petitioner for FY 2023-24 and FY 2024-25.

Table 13: Proposed Tariff Schedule for FY 2023-24

Table 13. Froposed Tariff Schedule for F1 2023-24						
Sr.		Fixed/ Demand	Wheeling	Energy Charges		
No	Consumer Category	Charge per	Charges	(Rs/kVAh)		
•		month	(Rs./kVAh)			
HIG	HIGH TENSION CATEGORIES					
1	HT I: HT- Industry	Rs. 360 per kVA	1.67	5.20		
2	HT II: HT Commercial	Rs. 360 per kVA	1.67	5.20		
3	HT III: HT Electric Vehicle	Rs. 70 per kVA	1.67	5.20		
	Charging Station	Ks. 70 per KVA		5.20		
LOW TENSION CATEGORIES						
4	LT I: LT- General Purpose	Rs. 280	1.67	6.50		
5	5 LT II: LT Commercial					
(A) (0-20 kW	Rs. 360	1.67	6.10		
(B) A	Above 20 kW	Rs. 360 per kVA	1.67	6.95		
6 LT III: LT Industry						
(A) (0-20 kW	Rs. 360	1.67	6.80		
(B) A	Above 20 kW	Rs. 360 per kVA	1.67	6.85		
7	LT IV: LT Electric Vehicle Charging Station	Rs. 70 per kVA	1.67	7.00		

Table 14: Proposed Tariff Schedule for FY 2024-25

Sr. No	Consumer Category	Fixed/ Demand Charge per month	Wheeling Charges (Rs./kVAh)	Energy Charges (Rs/kVAh)	
HIC	HIGH TENSION CATEGORIES				
1	HT I: HT- Industry	Rs. 360 per kVA	1.74	5.50	
2	HT II: HT Commercial	Rs. 360 per kVA	1.74	5.50	



Sr. No	Consumer Category	Fixed/ Demand Charge per month	Wheeling Charges (Rs./kVAh)	Energy Charges (Rs/kVAh)		
3	HT III: HT Electric Vehicle Charging Station	Rs. 70 per kVA	1.74	5.50		
LOV	V TENSION CATEGORIES					
4	LT I: LT- General Purpose	Rs. 280	1.74	6.50		
5	5 LT II: LT Commercial					
(A) (0-20 kW	Rs. 360	1.74	6.35		
(B) A	Above 20 kW	Rs. 360 per kVA	1.74	7.15		
6 LT III: LT Industry						
(A) (0-20 kW	Rs. 360	1.74	6.80		
(B) A	Above 20 kW	Rs. 360 per kVA	1.74	7.10		
7	LT IV: LT Electric Vehicle Charging Station	Rs. 70 per kVA	1.74	7.00		

The Petitioner requests the Hon'ble Commission to kindly approve the Tariffs as proposed in above Tables for respective years.



6 Prayers

The Petitioner prays to the Hon'ble Commission as under:

- i. To admit the MTR Petition as per the provisions of MERC (MYT) Regulations 2019, and consider for further proceedings before the Hon'ble Commission;
- ii. To approve the truing up and Revenue Gap/(Surplus) for FY 2019-20, FY 2020-21, and FY 2021-22 and recovery of the same through tariff, as proposed by the Petitioner;
- iii. To approve the provisional truing up and Revenue Gap/(Surplus) for FY 2022-23 and recovery of the same through tariff, as proposed by the Petitioner;
- iv. To allow recovery of past Revenue Gaps/(Surplus) along with the carrying/(holding) cost as proposed by the Petitioner;
- v. To approve Capex and Capitalization as proposed in this Petition;
- vi. To approve the revised ARR for FY 2023-24 and FY 2024-25 and its recovery through revised tariff as proposed by the Petitioner;
- vii. To determine the Petitioner's share of the Transmission Charges and MSLDC Charges, and consider the same while approving the ARR for the Petitioner for FY 2023-24 and FY 2024-25;
- viii. To approve the additional Green Energy Tariff of Rs. 0.53/kWh to be charged to consumers desirous of procuring additional RE power over and above the RPO target for the Petitioner;
 - ix. To approve the composite Wheeling Charges for FY 2023-24 and FY 2024-25, as proposed by the Petitioner;
 - x. To approve Retail Supply Tariff for FY 2023-24 and FY 2024-25 and the Tariff schedule, as proposed by the Petitioner;
 - xi. Condone any inadvertent omissions, errors, short comings and permit the Petitioner to add/change/modify/alter this filing and make further submissions as may be required at a future date; and
- xii. Pass such other and further Orders as deemed fit and proper in the facts and circumstances of the case.