



महाराष्ट्र विद्युत नियामक आयोग Maharashtra Electricity Regulatory Commission



Ref. No. MERC/FAC/2024-25/0452

Date: 24th July, 2024

To,
The Gigaplex Estate Private Ltd.,
K Raheja Corp, Level-9, Raheja Tower
Block 'G', Plot No. C-30,
Bandra Kurla Office
Bandra (E), Mumbai – 400 051

Subject: Post-facto approval of Fuel Adjustment Charges (FAC) submissions of GEPL for the months of January 2024, February 2024, and March 2024

Reference:

1. GEPL's FAC submission for the month of January 2024, February 2024, and March 2024 vide email dated 22 May 2024
2. Data gaps raised vide email dated 11th June 2024
3. GEPL's response to data gaps vide email dated 20th June 2024

Sir,

Upon vetting the FAC calculations for the months of January 2024, February 2024, and March 2024 as mentioned in the above reference, the Commission has accorded approval for charging FAC to its consumers as shown in the table below:

Month	January 2024	February 2024	March 2024
Z _{FAC} allowed for recovery (Rs. Crore)	0.171	0.166	0.178

The Commission allows the carry forward FAC of Rs. 1.411 Crores, Rs. 1.551 Crores, and Rs. 1.642 Crores for the months of January 2024, February 2024, and March 2024, respectively. Further, as directed by the Commission, GEPL shall maintain the monthly account of FAC Fund and upload it on its website to maintain transparency of FAC Fund and, also for information of all the stakeholders.



Yours faithfully,

(Dr. Rajendra G. Ambekar)
Secretary, MERC

Encl: Annexure A: Detailed Vetting Report for the period of January 2024, February 2024 and March 2024

**POST-FACTO APPROVAL FOR FAC CHARGES FOR THE MONTHS OF JANUARY 2024,
FEBRUARY 2024 AND MARCH 2024**

Subject: Post-facto approval of Fuel Adjustment Charges (FAC) submissions of GEPL for the months of January 2024, February 2024 and March 2024.

Reference:

1. GEPL's FAC submission for the month of January 2024, February 2024 and March 2024 vide email dated 22 May 2024
2. Data-gaps raised vide email dated 11th June 2024
3. GEPL's response to data-gaps vide email dated 20th June 2024

1. FAC submission by GEPL:

1.1 GEPL has made FAC submissions for the months of January 2024, February 2024 and March 2024 as referred above. Upon vetting the FAC calculations, taking cognizance of all the submissions furnished by GEPL, the Commission has accorded post-facto approval for the FAC amount to be charged in the billing months of January 2024, February 2024 and March 2024.

2. Background

2.1 On 31 March, 2023 the Commission has issued MTR Order in respect of GEPL (Case No. 215 of 2022) for Truing up of Aggregate Revenue Requirement for FY 2019-20, FY 2020-21 and FY 2021-22, Provisional Truing up for FY 2022-23 and approval of revised estimates of ARR and Tariff for FY 2023-24 and FY 2024-25. Revised Tariff has been made applicable from 1 April, 2023.

2.2 Vide its letter dated 20 April, 2020, the Commission communicated the excel formats and guiding principles for filing of FAC submissions to all Distribution Licensees including SEZs. The Commission also directed all Distribution Licensees to submit FAC computations, including details pertaining to variation in fuel cost of generators for the approval of the Commission.

2.3 The summary of the FAC Vetting Report approvals granted by the Commission till date is given below:

- Prior approval of the FAC for the month of April 2020 vide FAC Vetting Report dated 7 June, 2020.
- Post-facto approval to the FAC for the month of May and June 2020 vide FAC vetting Report dated 25 September, 2020.
- Post-facto approval to the FAC for the months of July 2020, August 2020 and September 2020 vide FAC vetting Report dated 30 November 2020
- Post-facto approval to the FAC for the months of October 2020, November 2020 and December 2020 vide FAC vetting Report dated 16 March 2021.



- Post-facto approval to the FAC for the month of January to March 2021 vide FAC Vetting Report dated 18 June, 2021.
- Post-facto approval to the FAC for the month of April to June 2021 vide FAC Vetting Report dated 11 October 2021.
- Post-facto approval to the FAC for the month of July to September 2021 vide FAC Vetting Report dated 30 December 2021.
- Post-facto approval to the FAC for the months of October 2021, November 2021 and December 2021 vide FAC Vetting Report dated 28 June 2023.
- Post-facto approval to the FAC for the months of January 2022, February 2022 and March 2022 vide FAC Vetting Report dated 24 July 2023.
- Post-facto approval to the FAC for the months of April 2022, May 2022 and June 2022 vide FAC Vetting Report dated 02 November 2023.
- Post-facto approval to the FAC for the month of July 2022, August 2022 and September 2022 vide FAC Vetting Report dated 02 November 2023.
- Post-facto approval to the FAC for the month of October 2022, November 2022 and December 2022 vide FAC Vetting Report dated 02 November 2023.
- Post-facto approval to the FAC for the month of January 2023, February 2023 and March 2023 vide FAC Vetting Report dated 02 November 2023.
- Post-facto approval to the FAC for the month of April 2023, May 2023 and June 2023 vide FAC Vetting Report dated 11 January 2024.
- Post-facto approval to the FAC for the month of July 2023, August 2023 and September 2023 vide FAC Vetting Report dated 11 March, 2024.
- Post-facto approval to the FAC for the month of October 2023, November 2023 and December 2023 vide FAC Vetting Report dated 18 June, 2024.

2.4 As per provisions of MYT Regulations, 2019 a Distribution Licensee (SEZ) is required to obtain post-facto approval of the Commission on a quarterly basis for FAC charges within 60 days of close of each quarter. Accordingly, vide its letter dated **22 May 2024 (sent vide email dated 22 May 2024)**, GEPL has filed the FAC submission for the month of January 2024, February 2024, and March 2024 vide email dated 22 May 2024. The Commission has scrutinized the submissions provided by GEPL and has also verified the fuel and power purchase bills provided along with its submissions.

3. Energy Sales of the Licensee

- 3.1 In the MTR Order dated 31 March 2023 passed by the Commission in Case No. 215 of 2022, the Commission has approved revised tariffs to maintain zero cross subsidy across tariff categories.
- 3.2 The net energy sales within licence area as submitted by GEPL in the FAC submission and as approved by the Commission are as shown in the Table 1 below:

Table 1: Energy Sales approved and actual in MUs

Consumer Category	Approved by the Commission (MU)	Monthly Approved (MU)	Actual Sales (MU)		
			Jan-24	Feb-24	Mar-24
	(I)	(II=I/12)	(III)	(IV)	(V)
HT Category					



Consumer Category	Approved by the Commission (MU)	Monthly Approved (MU)	Actual Sales (MU)		
			Jan-24	Feb-24	Mar-24
	(I)	(II=I/12)	(III)	(IV)	(V)
HT-I Industrial	22.26	1.86	1.76	1.70	1.71
HT-II Commercial	0.75	0.06	-	-	-
LT Category					
LT-II (A) Commercial (0-20 kW)	0.39	0.03	0.04	0.04	0.05
LT-II (B) Commercial (above 20 kW)	0.42	0.04	0.01	0.01	0.01
LT-III (A) Industrial (0-20 kW)	0.28	0.02	0.04	0.04	0.04
LT-III (B) Industrial (above 20 kW)	2.22	0.19	0.22	0.22	0.33
LT-IV Electric Vehicle (EV) Charging Stations	-	-	0.01	0.01	0.01
Total	26.32	2.19	2.07	2.02	2.14

3.3 It can be observed from above Table 1 that the actual sales during the months of January 2024, February 2024, and March 2024 is 2.07 MUs, 2.02 MUs and 2.14 MUs, respectively, which is 5.53% , and 8.07% and 2.27 % lower, respectively than the monthly approved energy sales of 2.19 MUs for the FY 2023-24. The major variation was primarily observed in HT I -Industry, HT II- Commercial, and LT II B – Commercial (above 20 KW).

4. Power Purchase Details

4.1 GEPL is a deemed Distribution Licensee notified by the Commission for IT & ITES SEZ located at Airoli, Thane. GEPL does not own or operate any generating stations. Accordingly, GEPL is required to procure power from outside sources in order to fulfil the electricity demand of its consumers.

4.2 Approved Power Purchase sources:

4.2.1 The KRC DISCOMs have entered into a PPA with GMR Energy Trading Limited (GMRETL) for purchase of 8 MW base load power from the period from 1 November 2022 to 31 October 2023. This PPA has been duly approved by the Commission vide its Order dated 28 October 2022 in Case No. 177 of 2022. The DISCOM wise share of power in the PPA is as follows: (i) GEPL's - 1.5 MW; (ii) KRCIPPL – 1.5 MW; and (iii) MBPPL – 5 MW. The generator identified by GMRETL is Birla Carbon for RTC supply.

4.2.2 In its MTR Order dated 31 March 2023 in Case No. 215 of 2022, the Commission has approved the power procurement from GMRETL at an average rate of Rs. 6.35/kWh for RTC power for the period 1 Nov 2022 to 31 October 2023.

4.2.3 Accordingly, short term power purchase agreement with the GMRETL ended on 31 October 2023. Hence there was no purchase of power in from GMRETL in the months of November 2024 to March 2024.

4.3 Further, GEPL has procured RE power through IEX in the GDAM, through HPX and PXIL in the GTAM and through Manikaran Power Limited during the months of January 2024, February 2024, and March 2024. GEPL purchased 0.01 MUs and 2.19 MUs of Solar and Non-Solar power in January 2024 at an average rate of Rs. 7.19 /kWh and Rs. 7.15 /kWh, respectively. Further, GEPL purchased 0.003 MUs of Solar power and 2.18 MUs of non-Solar power in February 2024 at an



average rate of Rs. 9.25/kWh and Rs. 6.91/kWh, respectively. Similarly, GEPL purchased 0.02 MUs and 0.85 MUs of Solar and non-Solar power in March 2024 at an average rate of Rs. 4.64/kWh and Rs. 4.75/kWh, respectively. Further, a differential cost adjustment for power procured from wind generators and claimed on provisional basis in the month of October 2023 to December 2023 have been made in the month of January 2024 when the actual bills have been received. This adjustment amounts to Rs. (0.005) Crore in January 2024.

- 4.4 The Commission notes that GEPL has purchased RE power through the power exchanges and Manikaran Power Limited (MPL) to meet the RPO obligations in the months of January 2024 to March 2024. The power purchase has been through the power exchanges where the prices are market driven and competitively discovered. The Commission in the MTR Order in Case no. 215 of 2022 has approved the RE procurement up to the RPO percentage stipulated in the Regulations for FY 2023-24 and FY 2024-25 and the tariff of RE sources is considered as Rs. 4.90 per unit which is weighted average rate of GDAM for the period of July to December 2022.
- 4.5 GEPL has procured 0.03 MUs, 0.01 MUs, and 1.44 MUs of power from Power Exchange at average rates of Rs. 7.46/kWh, Rs. 7.10/kWh, and Rs. 7.86/kWh during the months of January 2024, February 2024, and March 2024 respectively. GEPL has fulfilled its total load requirement by procuring power from power exchanges under its various products GDAM/GTAM apart from the contracted power with MPL for green power requirements and TAM, DAM, and RTM for conventional power.
- 4.6 Summary of power purchase of GEPL is as under:

Sr. No.	Particular	Compliance
1	Purchase from Approved Sources	Yes. In order dated 28 October, 2022 in Case No. 177 of 2022 the Commission has approved for combined power procurement of 8 MW RTC for period from 1 November, 2022 to 31 October, 2023. Further, in the MTR Order dated 31 March, 2023, in Case No. 215 of 2022, the Commission has approved a combined power procurement of 8 MW RTC for the three KRC DISCOMs, effective until October 31, 2023. Hence there was no purchase of power in from GMRETL in the months of November 2023 to March 2024. In line with the aforesaid order GEPL has procured power from MPL (wind power), and through various products from power exchange.
2	Merit Order Dispatch	Yes. GEPL procures power on short-term basis for bilateral mode of transaction (Wind generator). Further, GEPL met its peak power requirement through various product from power exchange and MPL which is in line with MOD principles.
3	Fuel Utilization Plan	Not applicable. All the sources of power procurement fall under Section 63 of EA, 2003.
4	DSM Pool	GEPL has drawn 0.04 MU, 0.02 MU and 0.13 from pool in the month of January 2024, February 2024 and March 2024 respectively.
5	Sale of Surplus Power	GEPL has sold surplus power of 0.003 MUs in month of January 2024.



Sr. No.	Particular	Compliance			
6	Power Purchase	Actual Power Purchase is 2.27 MUs, 2.21 MUs, and 2.43 MUs for January 2024, February 2024 and March 2024 respectively, as against approved monthly power purchase of 2.29 MUs.			
7	Source wise Power Purchase	Source Name	Approved* (MU)	Actual Oct 2023 (MU)	Proportion of each Source in Actual Purchase (%)
		RE Solar	0.24	0.01	0.63%
		RE Non-Solar [#]	0.26	2.19	96.35%
		Peak sources (GMR STPP) [@]	0.46	-	0.00%
		Exchange/ Other Peak Source/New Source	1.3	0.03	1.25%
		DSM Pool	-	0.04	1.92%
		Sale of Surplus Power	-	(0.00)	-0.15%
		Total	2.29	2.27	100.00%
		Source Name	Approved* (MU)	Actual Nov 2023 (MU)	Proportion of each Source in Actual Purchase (%)
		RE Solar	0.24	0.00	0.16%
	RE Non-Solar [#]	0.26	2.18	98.31%	
	Peak sources (GMR STPP) [@]	0.46	-	0.00%	
	Exchange/ Other Peak Source (PTC)/New Source	1.33	0.01	0.67%	
	DSM Pool	-	0.02	0.86%	
	Total	2.29	2.21	100.00%	
	Source Name	Approved* (MU)	Actual Dec 2023 (MU)	Proportion of each Source in Actual Purchase (%)	
	RE Solar	0.24	0.02	0.89%	
	RE Non-Solar [#]	0.26	0.85	34.82%	
	Peak sources (GMR STPP) [@]	0.46	-	0.00%	
	Exchange/ Other Peak Source/New Source	1.33	1.44	59.07%	
DSM Pool	-	0.13	5.21%		
Total	2.29	2.43	100.00%		
<p>*The power purchase quantum/cost approved in MTR Order is on yearly basis, however monthly approved numbers are derived for comparison purpose.</p> <p>@ The PPA for combined power procurement of 8 MW RTC for the three KRC DISCOMs for the period up to 31 October, 2023 was duly approved by the Commission vide its Order dated 28 October 2022 in Case No. 177 of 2022. Subsequently, in the MTR Order dated March 31, 2023, in Case No. 215 of 2022, the Commission has approved the power procurement through this source until 31 October 2023. The share of GEPL in this contract is 1.5 MW.</p>					



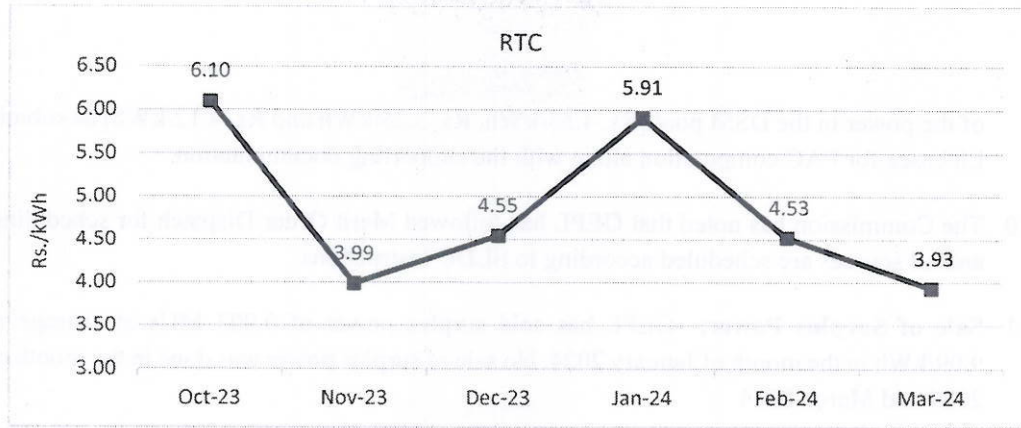
Sr. No.	Particular	Compliance
		<i>RE procurement is approved at a rate of Rs. 4.90/kWh which is weighted average rate of GDAM for the period of July to December 2022. # KRC Discoms has filed petition in Case No. 168 of 2023 before the Commission for approval of combined short term wind power procurement of upto 70 MW from M/s Manikaran Power Limited for the period 01.08.2023 to 31.07.2024 at Rs 2.25/kWh for Group I projects and Rs 2.52/kWh for Group II to IV projects. The procurement has been approved by the Commission vide its order dated 21 June 2024 in Case No 168 of 2023. GEPL has procured wind (RE) power through bilateral mode of transaction from the month of August 2023 and onwards from Manikaran Power Limited.</i>
8	Power Purchase under Section 63 of Electricity Act, 2003	Monthly power purchase invoices are submitted by GEPL. Power Purchase rates are verified from the PPA signed by GEPL with each source of power. Monthly power purchase quantum and rate are verified from the invoices, and it is ensured that same has been considered in the FAC calculation.

5. Power Purchase Cost:

- 5.1 The Commission has scrutinised the detailed bills/invoices submitted for power purchase during the month of January 2024, February 2024, and March 2024, to verify the claim of GEPL regarding Average Power Purchase Cost (APPC). The Commission has verified the actual as well as approved Net Purchase (MUs), Variable Cost (Rs. /kWh) and Power Purchase Cost considered in FAC computation from the invoices and applicable MTR Order respectively.
- 5.2 The Power Purchase cost incurred in January 2024, February 2024, and March 2024 is **Rs. 1.61 Crores, Rs. 1.52 Crores, and Rs. 1.59 Crores** respectively, which is significantly higher than the total approved monthly Power Purchase cost of **Rs. 1.26 Crores** by the Commission. The power purchase cost is higher on account of the actual cost of power purchase (per unit) being higher than the approved cost of power purchase for sources like exchange / new source and RE sources.
- 5.3 **Short term sources:** The KRC DISCOMs have entered a PPA with GMR Energy Trading Limited (GMRETL) for purchase of 8 MW base load power from the period from 1 November 2022 to 31 October 2023. This PPA has been duly approved by the Commission vide its Order dated 28 October 2022 in Case No. 177 of 2022. Subsequently, the Commission in MTR Order dated 31 March 2023 in Case no. 215 of 2022 has approved the power procurement from this source until 31 October 2023. Hence, there was no purchase of power in from GMRETL in the months of November 2023 to March 2024.
- 5.4 **Power Procurement from Exchange/Other Peak Sources:** KRC DISCOMs procured power from the Power Exchange for January to March 2024. GEPL has procured 0.03 MUs, 0.01 MUs, and 1.44 MUs of power from TAM / DAM / RTM products available on Power Exchange at average rates of Rs. 7.46/kWh, Rs. 7.10/kWh and Rs. 7.86 /kWh during the months of January 2024, February 2024, and March 2024, respectively. Though the actual cost of power purchase through exchange is higher in January 2024, February 2024, and March. The trends observed in the power exchange in the respective months as shown in the below figure



Figure 1: Exchange price trends (RTC)



- 5.5 **Renewable Sources:** The Commission has approved Rs. 0.25 Crore each for January 2024, February 2024, and March 2024 for purchase of RE power to meet Renewable Purchase Obligation (RPO). GEPL has purchased RE Solar and RE Non-Solar during the period January 2024 to March 2024. The RE Solar purchase quantum was 0.01 MUs, 0.003 MUs and 0.02 MUs at a power purchase rate of Rs. 7.19/kWh, Rs. 9.25 /kWh and Rs. 4.64 /kWh in the months of for January 2024, February 2024, and March 2024, respectively. Similarly, the RE Non-Solar purchase quantum was 2.19 MUs, 2.18 MUs, and 0.85 MUs at a power purchase rate of Rs. 7.15/kWh, Rs. 6.91/kWh, and Rs. 4.75/kWh in the months of January 2024, February 2024, and March 2024, respectively.
- 5.6 Accordingly, GEPL has sourced RE non-Solar power through the bilateral mode of transaction (wind generator - MPL). Further, the RE Solar and additional RE non-Solar power have also been sourced from the exchange (GDAM and GTAM), to meet the RPO obligation.
- 5.7 In the response to data gaps regarding unavailability of invoices pertaining to RE power procurement from MPL in the FAC proposal for quarter 2 of FY 2023-24, GEPL had submitted that it has not received invoices from the MPL for the month in which the power was procured. Hence, GEPL had considered wind generator calculation on the provisional basis based on the Renewable Energy (RE) replacement schedule derived from data provided by the Maharashtra State Load Dispatch Centre (MSLDC). Once the actual bills are received, the necessary adjustment between the provisional values and the actual values will be undertaken by GEPL in the month in which the bills are received. Accordingly, in line with the above approach, a differential cost adjustment for power procured from wind generators and claimed on provisional basis in the month of October 2023 to December 2023 have been made in the month of January 2024 when the actual bills have been received. This adjustment amounts to Rs. (0.005) Crores in January 2024.
- 5.8 The APPC for solar and non-solar sources are higher than approved rate of Rs. 4.90/kWh for both solar and non-solar in the months of January 2024 and February 2024. The Commission notes that the price of power is competitively discovered for the power sourced from the power exchange and GEPL has provided all the necessary supporting documents for verification of the cost. Accordingly, the Commission approves inclusion of the power purchased from RE sources for recovery through the FAC mechanism.
- 5.9 **DSM Pool:** GEPL has drawn 0.04 MU, 0.02 MU and 0.13 from pool in the month of January 2024, February 2024 and March 2024 respectively. The Commission has also considered the average price

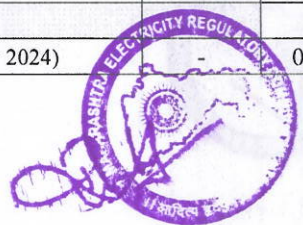


of the power in the DSM pool [Rs. 4.53/kWh, Rs. 3.25/kWh and Rs. 4.12/kWh] as submitted by the Licensee for FAC computation along with the supporting documentation.

- 5.10 The Commission has noted that GEPL has followed Merit Order Dispatch for scheduling of power and all sources are scheduled according to SLDC instructions.
- 5.11 **Sale of Surplus Power:** GEPL has sold surplus power of 0.003 MUs at average rate of Rs. 9.09/kWh in the month of January 2024. No sale of surplus power was done in the month of February 2024 and March 2024
- 5.12 The APPC during the period January 2024 to March 2024 is higher due to purchase of higher cost power both conventional (contracted as well as power exchange) and RE sources (power exchange).
- 5.13 The details of the overall cost approved and actual for the months of January 2024, February 2024, and March 2024, as per MTR Order is as shown in the Table 2 below:

Table 2: Approved and Actual Power Purchase Cost for GEPL

Source		Power Purchase Quantum (MU)	Fixed Cost (Rs. Crore)	Fixed Cost (Rs./ kWh)	Variable Cost (Rs. Crore)	Variable Cost (Rs./ kWh)	Total Cost (Rs. Crore)	APPC (Rs./ kWh)	
Peak sources (GMR STPP) #	Approved	0.46	-	-	0.29	6.34	0.29	6.34	
	Actual (January 2024)	-	-	-	-	-	-	-	
	Actual (February 2024)	-	-	-	-	-	-	-	
	Actual (March 2024)	-	-	-	-	-	-	-	
Exchange / Other Peak Source/New Source	Approved	1.33	-	-	0.72	5.40	0.72	5.40	
	Actual (January 2024)	0.03	-	-	0.02	7.46	0.02	7.46	
	Actual (February 2024)	0.01	-	-	0.01	7.10	0.01	7.10	
	Actual (March 2024)	1.44	-	-	1.13	7.86	1.13	7.86	
Solar & Non-Solar RE / REC	Approved	(RE Solar)	0.24 (RE Solar)	-	-	0.12	4.90	0.12	4.90
		(RE Non-Solar)	0.26 (RE Non Solar)	-	-	0.13	4.90	0.13	4.90
	Actual (January 2024)	(RE Solar)	0.01 (RE Solar)	-	-	0.01	7.19	0.01	7.19
		(RE Non-Solar)	0.219 (RE Non Solar)	-	-	1.57	7.15	1.57	7.15
	Actual (February 2024)	(RE Solar)	0.003 (RE Solar)	-	-	0.00	9.25	0.00	9.25
		(RE Non-Solar)	0.218 (RE Non Solar)	-	-	1.50	6.91	1.50	6.91
	Actual (March 2024)	(RE Solar)	0.02 (RE Solar)	-	-	0.01	4.64	0.01	4.64
		(RE Non-Solar)	0.85 (RE Non Solar)	-	-	0.40	4.75	0.40	4.75
DSM / Pool	Approved	-	-	-	-	-	-	-	
	Actual (January 2024)	0.04	-	-	0.02	4.53	0.02	4.53	
	Actual (February 2024)	0.02	-	-	0.01	3.25	0.01	3.25	
	Actual (March 2024)	0.13	-	-	0.05	4.12	0.05	4.12	
SLDC Fee	Approved	-	-	-	-	-	-	-	
	Actual (January 2024)	-	0.001	-	-	-	0.001	-	

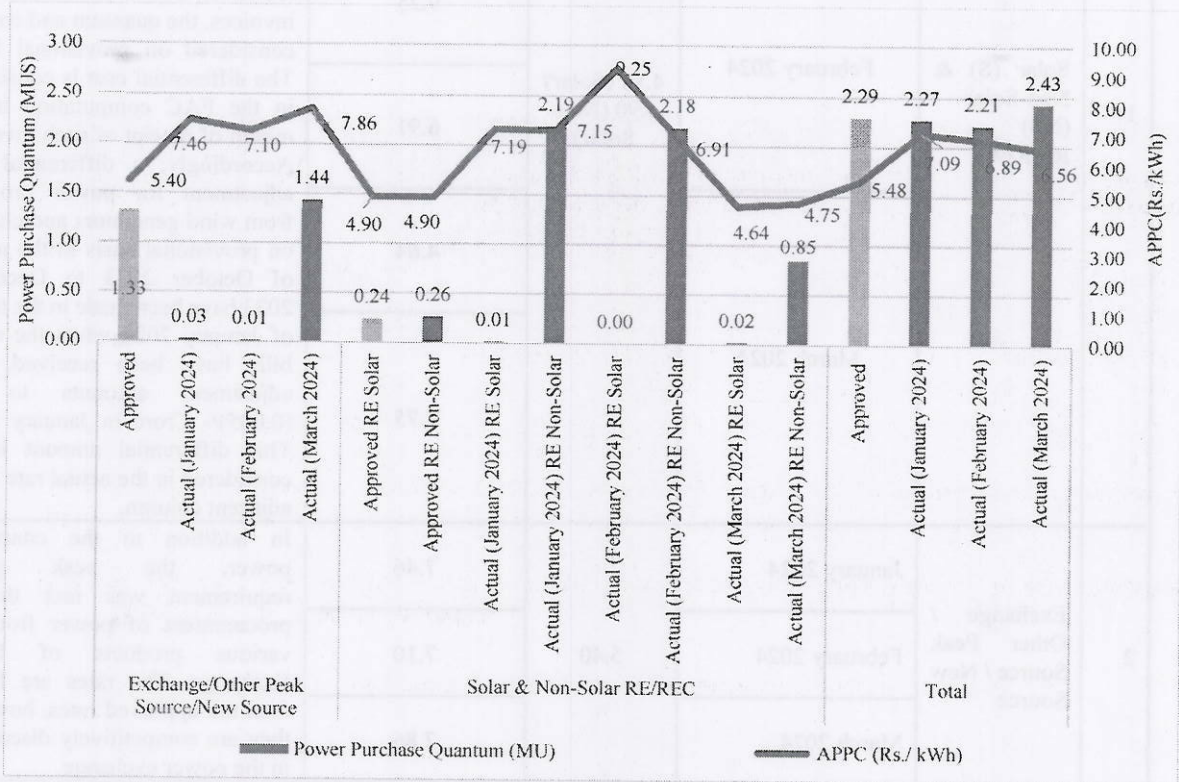


Source		Power Purchase Quantum (MU)	Fixed Cost (Rs. Crore)	Fixed Cost (Rs./ kWh)	Variable Cost (Rs. Crore)	Variable Cost (Rs./ kWh)	Total Cost (Rs. Crore)	APPC (Rs./ kWh)
	Actual (February 2024)	-	0.001	-	-	-	0.001	-
	Actual (March 2024)	-	0.001	-	-	-	0.001	-
Total	Approved	2.29	-	-	1.26	5.48	1.26	5.48
	Actual (January 2024)	2.27	0.001	-	1.61	7.08	1.61	7.09
	Actual (February 2024)	2.21	0.001	-	1.52	6.88	1.52	6.89
	Actual (March 2024)	2.43	0.001	-	1.59	6.55	1.59	6.56

Power purchase agreement with the GMRETL ended on 31 October 2023. Hence there was no purchase of power in from GMRETL in the months of January 2024 to March 2024

5.14 Source wise approved and actual quantum of power procured from some of the key sources and APPC is shown in the graph below:

Figure 2: Variation in Power Procurement and Total per unit Cost



5.15 Reasons for the rate variation for various sources are as shown below:



Table 3: Reasons for rate variation for various Sources

Sr. No.	Source	Month	Approved Rate (Rs. /kWh)	Actual Rate (Rs. /kWh)	Reason for rate variation
1	Solar (S) & Non-Solar (NS) RE/REC	January 2024	4.90 (Solar) 4.90 (Non-Solar)	7.19	Market discovered rate: RE power was purchased during the period from January 2024 to March 2024 from Power Exchange (GDAM, and GTAM). Wind energy was also procured from Manikaran Power Limited at average rate of Rs 2.25/kWh for Group I projects and Rs 2.52/kWh for Group II to IV projects. However, due to unavailability of invoices, the quantum and cost are considered on provisional basis. The differential cost is considered in the FAC computation in the month of receipt of such invoices. Accordingly, a differential cost adjustment for power procured from wind generators and claimed on provisional basis in the month of October 2023 to December 2023 have been made in the month of January 2024 when the actual bills have been received. This adjustment amounts to Rs. (0.005)/- Crore in January 2024. This differential amount is not considered in the actual rate in the adjacent column.
				7.15	
		February 2024		9.25	
				6.91	
		March 2024		4.64	
				4.75	
2	Exchange / Other Peak Source / New Source	January 2024	5.40	7.46	In addition to the contracted power, the peak power requirement was met through procurement of power from the various products of Power Exchange. The rates are higher than the approved rates, however, they are competitively discovered in the power exchange.
		February 2024		7.10	
		March 2024		7.86	
3	DSM Imbalance Pool	January 2024	-	4.53	DSM rates are based on supporting documents provided by GEPL.
		February 2024		3.25	
		March 2024		4.12	
4	Total	January 2024		7.09	Due to above factors
		February 2024		6.89	
		March 2024		6.56	

5.16 Considering the above, the Commission allows the average power purchase cost of Rs. 7.09/kWh, Rs. 6.89/kWh and Rs. 6.56/kWh for the months of January 2024, February 2024 and March 2024. The variation in power purchase cost is on the higher side in January 2024, February 2024, and March 2024 due to higher cost of RE and conventional power purchase from exchange.



6. **FAC on account of fuel and power purchase cost (F)**

- 6.1 The Commission has worked out the average power purchase costs for the months of January 2024, February 2024 and March 2024 as shown in Table 2 above. The same has been compared with the average power purchase cost approved by the Commission in MTR Order dated 31 March 2023 in Case no. 215 of 2022 to arrive at the differential per unit rate at which Z_{FAC} is to be passed on to the consumers.
- 6.2 Thus, the following Table 4 shows the Z_{FAC} worked out by the Commission on account of difference in power purchase cost for the month of January 2024, February 2024, and March 2024.

Table 4: FAC on account of Power Purchase Cost

Sr. No.	Particulars	Units	Jan-24	Feb-24	Mar-24
1	Average power purchase cost approved by the Commission	Rs./kWh	5.48	5.48	5.48
2	Actual average power purchase cost	Rs./kWh	7.09	6.89	6.56
3	Change in average power purchase cost (=2 -1)	Rs./kWh	1.61	1.41	1.08
4	Net Power Purchase	MU	2.27	2.21	2.43
5	Change in power purchase cost (=3 x 4/10)	Rs. Crore	0.37	0.31	0.26

7. **Adjustment for over recovery/under recovery (B)**

- 7.1. The adjustment factor for over recovery / under recovery (B) is as shown in the Table 5 below:

Table 5: Adjustment for over recovery/under recovery

S. No.	Particulars	Units	Jan-24	Feb-24	Mar-24
1.1	Incremental cost allowed to be recovered in Month n-4	Rs. Crore	0.173	0.166	0.171
1.2	Incremental cost in Month n-4 actually recovered in month n-2	Rs. Crore	0.181	0.181	0.176
1.3	(over-recovery)/under-recovery (=1.2 - 1.1)	Rs. Crore	-0.01	-0.02	-0.01
2	Carried forward adjustment for over-recovery/under-recovery attributable to application of ceiling limit for previous month	Rs. Crore	1.22	1.41	1.55
3	Adjustment factor for over-recovery/under-recovery (1.3+2.0)	Rs. Crore	1.21	1.40	1.55

8. **Carrying Cost for over recovery/under recovery (C)**

- 8.1 Carrying Cost/(Holding Cost) for under recovery/(over recovery) has been granted at the approved interest rate for the eligible amount which works out to **Rs. 0.01 Crores, Rs. 0.01 Crores, and 0.01 Crores** for the months of January 2024, February 2024 and March 2024, respectively.
- 8.2 The Commission has considered one-year SBI MCLR rate of the month plus 150 basis points which works out to be **10.15%** for January 2024, **10.15%** for February 2024, and **10.15%** for March 2024, respectively.
- 8.3 The Commission has computed the holding cost towards the amount over recovered in the month of January 2024 to March 2024 which is as shown in the Table 6 **Error! Reference source not found.** below:



Table 6: Carrying/Holding Cost for over/under recovery

Particulars	Units	Jan-24	Feb-24	Mar-24
Adjustment factor for over-recovery/under-recovery	Rs. Crore	1.21	1.40	1.55
Interest rate	%	10.15%	10.15%	10.15%
Carrying cost for over-recovery/under-recovery	Rs. Crore	0.01	0.01	0.01

9. Holding Cost for FAC Fund

- 9.1 The Commission in its FAC approval for the month of March 2021 has decided to accumulate the FAC fund arising out of negative monthly FAC up to March 2023 along with the holding cost. The Commission decided to continue with the same principle for the FY 2023-24 and FY 2024-25 as well as per the decision outlined in the MTR Order in Case No. 215 of 2022. Accordingly, as per said principle laid down by the Commission, GEPL will carry forward the negative FAC amount and accumulate the same in the FAC Fund along with holding cost, as applicable.
- 9.2 The Commission has determined positive FAC of 1.581 Crores, Rs. 1.717 Crores and Rs. 1.820 Crores for the months of January 2024, February 2024, and March 2024, respectively. There was no FAC fund available at the beginning of January 2024. Further, the Commission has determined positive FAC for the months of January 2024, February 2024, and March 2024. Accordingly, the FAC fund of nil amount has been approved at the end of each the month from January 2024 to March 2024.
- 9.3 The Commission has considered the one-year MCLR rate declared by the SBI from time to time plus 150 basis points which works out to 10.15% for January 2024, 10.15% for February 2024, and 10.15% for March 2024, respectively. Considering that the FAC fund approved by the Commission is nil, the Commission has calculated nil holding cost for the months January 2024, February 2024, and March 2024, to be contributed to the FAC Pool.

10. Disallowance due to excess Distribution Loss

- 10.1 Regulation 10.8 of MYT Regulations, 2019 provides for FAC amount to be reduced in case the actual annual sliding distribution loss for the month exceeds the approved distribution loss. The relevant extract is reproduced as follows.

“10.8 The total Z_{FAC} recoverable as per the formula specified above shall be recovered from the actual sales in terms of “Rupees per kilowatt-hour”:

Provided that, in case of unmetered consumers, the Z_{FAC} shall be recoverable based on estimated sales to such consumers, computed in accordance with such methodology as may be stipulated by the Commission:

Provided further that, where the actual annual sliding distribution losses of the Distribution Licensee exceed the level approved by the Commission, the amount of Z_{FAC} corresponding to the excess distribution losses (in kWh terms) shall be deducted from the total Z_{FAC} recoverable.”



10.2 The following table provides the comparison of approved and actual distribution loss and disallowance due to excess distribution loss:

Table 7: Disallowance of FAC due to excess Distribution Loss

Sr. No.	Particulars	Units	Approved in Tariff Order	Jan-24	Feb-24	Mar-24
1	Net Energy input at Distribution Voltages	MU	2.22	2.10	2.03	2.17
2	Energy sales at Distribution voltages	MU	2.19	2.07	2.02	2.14
3	Distribution Loss (1 - 2)	MU	0.03	0.03	0.02	0.03
4	Distribution Loss as % (3/1)	%	1.20%	1.52%	0.83%	1.24%
5	Annual Sliding Distribution Loss	%		1.35%	1.31%	1.28%
6	Excess Distribution Loss = [Annual Sliding Distribution Loss - Distribution loss approved] x Net Energy Input (1)	MU		0.003	0.002	0.002
7	Disallowance of FAC due to excess Distribution Loss	Rs. Crore		0.002	0.002	0.001

10.3 As seen from the above Table 7, the annual sliding distribution loss for the months of January 2024, February 2024, and March 2024 is 1.35%, 1.31 %, and 1.28%, respectively, which is higher than MTR approved distribution loss is 1.20%. The monthly distribution loss for the month of February 2024 is lower than the distribution loss of 1.20% approved in the MTR Order. However, the monthly distribution loss for the months of January 2024 and March 2024 is higher than the MTR approved distribution loss of 1.20%, respectively.

10.4 The Commission observed that GEPL has worked out the disallowance of FAC due to excess Distribution Loss based on the annual approved sliding Distribution Loss corresponding to the standalone energy input at distribution voltage for the month of January 2024 to March 2024. As the standalone FAC for all these months is positive and since the month wise annual sliding losses are higher than the approved distribution loss, GEPL has considered Rs. 0.002 Crore, Rs. 0.002 Crore and Rs. 0.001 Crore amount of disallowance of FAC due to excess distribution loss for the months of January 2024, February 2024 and March 2024 respectively. The same is approved by the Commission.

11. Summary of Allowable Z_{FAC}

11.1 The summary of the FAC amount as approved by the Commission for the month January 2024, February 2024, and March 2024 which is allowed to be recovered in the billing month of March 2024, April 2024 and May 2024 is shown in the Table 8 below.

Table 8: Summary of Allowable Z_{FAC}

Sr. No.	Particulars	Units	Jan-24	Feb-24	Mar-24
1	Calculation of Z_{FAC}				
1.1	Change in cost of generation and power purchase attributable to Sales within the License Area (F)	Rs. Crore	0.365	0.312	0.262
1.2	Carrying cost for over-recovery/under-recovery (C)	Rs. Crore	0.010	0.012	0.013
1.3	Adjustment factor for over-recovery/under-recovery (B)	Rs. Crore	1.208	1.396	1.546
1.5	$Z_{FAC} = F+C+B$	Rs. Crore	1.584	1.719	1.821



Sr. No.	Particulars	Units	Jan-24	Feb-24	Mar-24
2	Calculation of FAC Charge				
2.1	Energy Sales within the License Area	MU	2.072	2.017	2.144
2.2	Excess Distribution Loss	MU	0.003	0.002	0.002
2.3	ZFAC per kWh *	Rs./kWh	7.632	8.515	8.487
2.4	Cap at 20% of variable component of tariff	Rs./kWh	0.893	0.893	0.893
2.5	FAC Charge allowable (Minimum of 2.3 and 2.4)	Rs./kWh	0.893	0.893	0.893
3	Recovery of FAC				
3.1	FAC disallowed corresponding to excess Distribution Loss $[(2.1+2.2) \times 2.3/10]$	Rs. Crore	0.002	0.002	0.001
3.2	Allowable FAC	Rs. Crore	1.581	1.717	1.820
4	Utilization of FAC Fund				
4.1	Opening Balance of FAC Fund	Rs. Crore	-	-	-
4.2	Holding Cost on FAC Fund	Rs. Crore	-	-	-
4.3	Z _{FAC} for the month (Sr. No. 3.2)	Rs. Crore	1.581	1.717	1.820
4.4	Closing Balance of FAC Fund	Rs. Crore	-	-	-
4.5	Z _{FAC} leviable/refundable to consumer	Rs. Crore	1.581	1.717	1.820
5	Total FAC based on category wise and slab wise allowed to be recovered	Rs. Crore	0.171	0.166	0.178
6	Carried forward FAC for recovery during future period (3.1-3.2-4)	Rs. Crore	1.411	1.551	1.642

11.2 It can be seen from the above Table 8 that the standalone FAC for the month of January 2024, February 2024 and March 2024 is Rs. 1.581 Crores, Rs. 1.717 Crores, and Rs. 1.820 Crores respectively. Based on energy sales and excess distribution loss, FAC per unit has been worked out as Rs. 7.632/kWh, Rs. 8.515/kWh and Rs. 8.487/kWh for the months of January 2024, February 2024, and March 2024 respectively as shown above. The Commission while approving the FAC has rectified the discrepancy in computation of the FAC allowed to be recovered based on category wise and slab wise sales in the submission of GEPL.

11.3 Further, the Regulation 10.9 of MYT Regulations, 2019 specifies as:

Provided that the monthly Z_{FAC} shall not exceed 20% of the variable component of Tariff or such other ceiling as may be stipulated by the Commission from time to time:

11.4 The FAC in January 2024, February 2024 and March 2024 is positive, however, as there is no FAC fund presently available with GEPL, there is no adjustment of the FAC for the month with the FAC fund. As the FAC per unit computed in the month of January 2024 (Rs. 7.632/kWh), February 2024 (Rs. 8.515/kWh), and March 2024 (Rs. 8.487/kWh) as shown in Table 8 above is higher than the 20% cap (Rs. 0.893/kWh) specified in MYT Regulations, 2019, hence, the restriction is triggered with regards to such ceiling.

11.5 Accordingly, considering the ceiling limit (Rs. 0.893/kWh) at 20%, the FAC recoverable will be lower. Accordingly, due to ceiling limit (Rs. 0.893/kWh), the FAC recoverable has been worked out as Rs. 0.171 Crores, Rs. 0.166 Crores and Rs. 0.178 Crores for the months of January 2024, February 2024 and March 2024 respectively.

11.6 Thus, considering the ceiling limit of 20% of variable component of tariff and the matter discussed in the preceding paragraph, FAC equivalent Rs. 1.411 Crores (i.e., Rs. 1.581 Crores minus Rs. 0.171 Crores) for the month of January 2024, Rs. 1.551 Crores (i.e., Rs. 1.717 Crores minus Rs. 0.166



Crores) for the month of February 2024, and Rs. 1.642 Crores (i.e., Rs. 1.820 Crores minus Rs. 0.178 Crores) for the month of March 2024 has remained unrecovered which will be recovered as part of FAC of upcoming months.

- 11.7 There was nil FAC fund available at the beginning of January 2024 and no FAC fund was created during the period from January 2024 to March 2024, accordingly, the Commission has also approved nil holding cost on the FAC Fund during the months of January 2024 to March 2024. The Commission has determined a positive FAC of Rs. 1.581 Crores, Rs. 1.717 Crores and Rs. 1.820 Crores for the months of January 2024, February 2024, and March 2024, respectively. Accordingly, the positive FAC determined by the Commission for January 2024, February 2024 and March 2024 is recoverable from the consumers. The recovery during each month will be subject to the cap of 20% of variable component of tariff as discussed earlier.

12. Recovery from Consumers:

- 12.1 Regulation 10.9 of MERC MYT Regulations, 2019 provides for methodology of recovery of FAC charge from each category of consumers. The relevant extract is reproduced as below.

“10.9 The Z_{FAC} per kWh for a particular Tariff category/sub-category/consumption slab shall be computed as per the following formula: —

$$Z_{FAC\ Cat} (Rs/kWh) = [Z_{FAC} / (\text{Metered sales} + \text{Unmetered consumption estimates} + \text{Excess distribution losses})] * k * 10,$$

Where:

$Z_{FAC\ Cat}$ = Z_{FAC} component for a particular Tariff category/sub-category/consumption slab in ‘Rupees per kWh’ terms ;

k = Average Billing Rate / ACOS ;

Average Billing Rate = Average Billing Rate for a particular Tariff category/sub-category/consumption slab under consideration in ‘Rupees per kWh’ as approved by the Commission in the Tariff Order:

Provided that the Average Billing Rate for the unmetered consumers shall be based on the estimated sales to such consumers, computed in accordance with such methodology as may be stipulated by the Commission:

ACOS = Average Cost of Supply in ‘Rupees per kWh’ as approved for recovery by the Commission in the Tariff Order:

Provided that the monthly Z_{FAC} shall not exceed 20% of the variable component of Tariff or such other ceiling as may be stipulated by the Commission from time to time:

Provided further that any under-recovery in the Z_{FAC} on account of such ceiling shall be carried forward and shall be recovered by the Distribution Licensee over such future period as may be directed by the Commission....”

- 12.2 The Commission has worked out FAC per unit for each category of consumer based on the formula provided in the above Regulations.



12.3 The following April 2024 and May 2024.

12.4 Table 9 Category wise FAC Revenue for billing month of month March 2024, April 2024, and May 2024 shows per unit Z_{FAC} for the month of January 2024, February 2024 and March 2024 to be levied on consumers of GEPL in the billing month of March 2024, April 2024 and May 2024.

Table 9 Category wise FAC Revenue for billing month of month March 2024, April 2024, and May 2024

Sr. No	Consumer Category	Slabs	Z _{FAC} computed for the month of Jan 2024	Z _{FAC} computed for the month of Feb 2024	Z _{FAC} computed for the month of Mar 2024
	HT Category				
1	HT- I Industrial	all units	0.141	0.136	0.137
2	HT-II Commercial	all units	-	-	-
	LT Category				
3	LT-II (A) Commercial (0-20 kW)	all units	0.005	0.005	0.005
4	LT-II (B) Commercial (above 20 kW)	all units	0.001	0.001	0.001
5	LT-III (A) Industrial (0-20 kW)	all units	0.004	0.004	0.004
6	LT-III (B) Industrial (above 20 kW)	all units	0.020	0.020	0.030
7	LT-IV – Electric Vehicle (EV) Charging Stations	all units	0.000	0.000	0.001
	Total FAC Recovery (Rs. Crore)		0.171	0.166	0.178

