



महाराष्ट्र विद्युत नियामक आयोग Maharashtra Electricity Regulatory Commission

Ref. No. MERC/FAC/2024-25/ ०५५७

Date: 30 August, 2024

To,
The Chief Executive Officer,
Adani Electricity Mumbai Limited,
Devidas Lane, Off SVP Road,
Near Devidas Telephone Exchange
Borivali (W), Mumbai – 400 092

Subject: Prior approval of Fuel Adjustment Charges (FAC) submissions of AEML-D for the month of March, 2024.

Reference:

1. AEML-D FAC submission for the month of March 2024 vide email dated 04 July 2024
2. The data gaps were communicated vide emails dated 10 July 2024
3. AEML-D replied vide emails dated 24 July 2024

Sir,

Upon vetting the FAC calculations for the month of March 2024 as mentioned in the above reference, the Commission has accorded approval for charging FAC amount of **Rs. (18.39) Crore**. The recoverable FAC available at the beginning of March 2024 is **Rs. 206.75 Crore** and hence the closing balance of the FAC recoverable at the end of March 2024 is **Rs. 188.36 Crore**.

AEML-D has submitted the FAC proposal for March 2024 on 4 July 2024 instead of filing it in the month of April 2024 as per the prescribed regulatory timelines. This delay in FAC submission has led to a delay in allowing the FAC recovery on a regular basis.

In its FAC submission for the month of May 2024, AEML-D has requested the Commission to allow cumulative recovery of FAC for the period January 2024 to May 2024 and recovery of revised FAC from September 2024 onwards at FAC ceiling rate (20% of category energy charge) to ensure that accumulated revenue gap can be mopped up to the maximum possible and avoiding the impact of carrying cost on the accumulated amount. In this regard, AEML-D has also submitted that the Commission vide letter dated 19 April 2024, has approved the FAC for the period up to December 2023 and also has approved the category wise FAC for recovery for the months from May 2024 to August 2024 at the ceiling rate (20% of category energy charges) and considered the balance FAC amount of Rs. 20.23 crore to be recovered in the month of September 2024. AEML-D has suggested that the amount allowed to be recovered in September 2024 (Rs. 20.23 Crore) should be clubbed with the FAC accumulated for the period January 2024 to May 2024 and allowed for recovery in the months of September 2024 and October 2024. As the billing for the month of September 2024 has not

Page 1 of 33

commenced, AEML-D has requested the Commission to revise the FAC allowed for recovery in September 2024 to 20% of category energy charge and allow recovery of the total accumulated FAC for the period January 2024 to May 2024 including the recovery allowed earlier in September 2024 (Rs. 20.23 Crore) over the billing period of September 2024 and October 2024. The portion of the accumulated FAC not recovered over the period September 2024 and October 2024 is proposed to be recovered along with the FAC for period June 2024 onwards.

Similar situation was prevailing earlier as well, and this situation could have been envisaged well in advance by AEML-D and they could have ensured time submission of FAC proposals and response to data gaps raised by the Commission presently and in the past as well.

As highlighted by the Commission in the past FAC approval reports, variation in FAC amounts over different months lead to variation in Tariff for end consumers on a monthly basis thereby defeating the objective of creating FAC stabilization fund. In similar situations in the past, the Commission has taken an approach to accumulate the FAC leviable and allowing the recovery of such accumulated amounts in ensuing billing months. Similar approach was also adopted by the Commission for the period July 2023 to December 2023 wherein the recovery was allowed over the period May 2024 to September 2024 at the ceiling rate (20% of category energy charge). Accordingly, considering the accumulated FAC over the period January 2024 to May 2024, the Commission deems it appropriate to adopt a similar approach of accumulating the FAC for January 2024 to May 2024 and allowing recovery at the ceiling limit of the FAC charge (20% of category energy charge) which would ensure that the accumulated FAC gets passed through via the FAC mechanism to the maximum extent possible in the remaining period and thus avoiding the impact of carrying cost on the accumulated FAC and the revenue gap to be carried forward to the new Multi Year Tariff control period will be minimal, thus minimising the carrying cost impact on the consumers to that extent. Accordingly, the Commission considers it appropriate to accumulate the FAC for the period of January 2024 to May 2024 and allow its recovery in the ensuing billing months at ceiling rate. The recovery will start from September 2024 and the overall period of recovery will be decided in the Commission's approval on the FAC submission for May 2024. Accordingly, the FAC amount chargeable to consumers is as shown in the table below:

Month	FAC Amount (Rs. Crore)
March 2024	0

Accordingly, the Commission allows AEML-D to carry forward the FAC amount of Rs. 188.36 Crore for recovery in the future period along with the applicable carrying cost (excluding the period of delay). The issue related to disallowance of carrying cost for the period of delay in FAC submissions by AEML-D has been discussed in detail by the Commission in its approval on FAC for the month of April 2023. Same reasons are also valid in the present situation as well.

In view of the above, the Commission deems it appropriate to not allow AEML-D to recover the carrying cost on the FAC over the period of delay. Considering the accumulation of the FAC over a period of 5 months, under normal circumstances, the accumulated FAC for the period January 2024 to May 2024 would have been recoverable from July 2024 onwards. However, in the present situation,



the recovery can only start from September 2024. Accordingly, considering that the delay is attributable to AEML-D, the Commission deems it appropriate to disallow the carrying cost for the period of delay from July 2024 to August 2024. AEML-D is accordingly not allowed to recover the same from the consumers.

AEML-D is also directed to streamline the process of timely submission of the FAC filings for the period beyond May 2024 and submit the pending filings at the earliest. Failure of AEML-D to adhere to the timeline established by the Commission may force the Commission to take appropriate action for the delays including but not limited to disallowance of the interest on working capital during the period of delay, forfeiture of the carrying cost, etc.

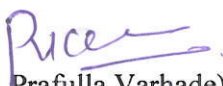
Further, as directed in the Order in Case No. 231 of 2022, in order to maintain transparency in the management and use of such FAC Fund, AEML-D shall maintain a monthly account of such FAC fund and upload it on its website for information of stakeholders.

AEML-D is directed to file their future FAC submissions taking into consideration data gaps raised in previous months to ensure timely prior approval.

AEML-D is also directed to submit a copy of the monthly Bill after levy of FAC as approved by the Commission.



Yours faithfully,


(Dr. Prafulla Varhade)
Director (Elect. Engg.), MERC

Encl: Annexure A: Detailed Vetting Report for the month of March 2024.

PRIOR APPROVAL FOR FAC CHARGES FOR THE MONTH OF March 2024

Subject: Prior approval of Fuel Adjustment Charges (FAC) submissions of AEML-D for the month March 2024.

Reference:

1. AEML-D FAC submission for the month of March 2024 vide email dated 04 July 2024
2. The data gaps were communicated vide emails dated 10 July 2024
3. AEML-D replied vide emails dated 24 July 2024

1. FAC submission by AEML-D:

- 1.1 AEML-D has made FAC submissions for the month of March 2024 as referred above. Upon vetting the FAC calculations, taking cognizance of all the submissions furnished by AEML-D, the Commission has accorded prior approval to AEML-D for the **FAC amount of Rs. (18.39) Crore.**
- 1.2 The opening recoverable FAC available at the beginning of March 2024 is **Rs. 206.75 Crore** and considering the FAC for the month of March 2024 of **Rs. (18.39) Crore**, the total FAC recoverable at the end of March 2024 is **Rs. 188.36 Crore.**
- 1.3 With the objective of reducing the Tariff variations and also considering the delayed FAC submissions on part of AEML-D for the period of January 2024 to May 2024, the Commission, in line with the approach adopted in the past, is allowing accumulation of the FAC amount for the period of January 2024 to May 2024 and such accumulated FAC is being allowed to be recovered in the future billing months.
- 1.4 Further, considering delay in submission of FAC by AEML-D, the Commission has disallowed the carrying cost for the period of delay. The positive FAC for January 2024 to May 2024 was expected to be levied from July 2024 onwards. On account of delay on part of AEML-D, the recovery is possible only from September 2024 onwards. Hence, the carrying cost for delayed period (January 2024 to May 2024) is disallowed and shall not be allowed to be passed through to AEML-D consumers.
- 1.5 Further, as discussed in para 11.3 to 11.5 of this report, the recovery of FAC for the period January 2024 to May 2024 will start from September 2024 and the overall period for recovery will be discussed in the Commission's approval on the FAC submission for May 2024.

2. Background

- 2.1 On 31 March, 2023 the Commission has issued the Mid Term Review Order in respect of AEML-D (Case No. 231 of 2022) for approval of Truing-up of FY 2019-20 to FY 2021-22,



Provisional Truing-up for FY 2022-23 and Revised Aggregate Revenue Requirement for FY 2023-24 and FY 2024-25. Revised Tariff has been made applicable from 1 April, 2023.

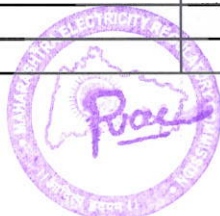
- 2.2 Vide its letter dated 20 April, 2020, the Commission communicated the excel formats for filing of FAC submissions to all Distribution Licensees including SEZs. The Commission also directed all Distribution Licensees to submit FAC computations, including details pertaining to variation in fuel cost of generators for the approval of the Commission. On 19 May, 2021, the Commission has also issued guidelines for considering consumer sales in FAC computation from April, 2021 onwards based on uniform methodology.
- 2.3 As per Prior Approval of FAC Guidelines dated 20 April, 2020, the Commission directed Distribution Licensee to seek prior approval for monthly FAC computations. Accordingly, vide its email dated 4 July 2024, AEML-D has filed FAC submissions for the month of March 2024 for prior approval of the Commission. The Commission has scrutinized the submissions provided by AEML-D and has also verified the power purchase bills and other fuel related invoices provided along with its submissions.

3. Energy Sales of the Licensee

- 3.1 The net energy sales within licence area as submitted by AEML-D in the FAC submission and as approved by the Commission are as shown in Table 1.

Table 1: Energy Sales – Approved and Actual

Consumer Category	Approved by the Commission (MU)	Monthly Approved (MU)	Actual Sales (March 2024) (MU)
	(I)	(II=I/12)	(III)
LT Category			
BPL	0.01	0.00	0.00
LT-I: Residential	4,897.01	408.08	340.15
LT-II: Commercial	3,245.40	270.45	212.59
LT-III(A): LT Industrial up to 20 kW TOD Option	391.95	32.66	26.66
LT-III(B): LT Industrial above 20 kW	446.52	37.21	26.61
LT-V: LT- Advertisements and Hoardings	-	-	-
LT-VI: LT -Street Lights	-	-	-
LT-VII: LT -Temporary Supply	-	-	-
LT-VIII: LT - Crematorium & Burial Grounds	-	-	-
LT-X: LT -Public Service (A)	44.66	3.72	2.25
LT-X: LT -Public Service (B)	215.84	17.99	16.23
LT-X (A): LT - Agriculture Pump sets	0.05	0	0.01
LT-X (B): LT - Agriculture Others	0.39	0.03	0.02
LT-IV: Public Water Works	-	-	-
LT-IX: LT - EVCS	3.73	0.31	0.86
HT Category			
HT 1 (Industrial)	614.12	51.18	49.69
HT 2 (Commercial)	426.79	35.57	41.27
HT 3 (Group Housing Soc.)	10.96	0.91	0.83
EHT Industry	180.00	15.00	-
EHT Metro & Monorail	120.00	10.00	0.14



Consumer Category	Approved by the Commission (MU)	Monthly Approved (MU)	Actual Sales (March 2024) (MU)
	(I)	(II=I/12)	(III)
HT - Public Services (A)	11.46	0.96	0.22
HT - Public Services (B)	306.62	25.55	18.98
HT - EV Charging station	70.00	5.83	-
Total	10,985.51	915.46	736.51

**In Case of AEML-D, the sales are approved on annual basis. Monthly approved sales are derived based on approved annual sales for comparison purpose.*

3.2 It can be observed from above Table 1 that **actual sales during March 2024 is 736.51 MU which is 21% lower than approved energy sales of 915.46 MU per month for the FY 2023-24**. The sale considered is after netting off the GCN credit for Open Access consumption. AEML-D has considered the energy sales for FAC purposes for March 2024 as follows:

- Energy sales data for HT consumers (AMR) & LT consumers (load above 20 kW) where meters are read remotely or where monthly reading are downloaded is considered for nth month (i.e., for March 2024).
- For cycle consumers (LT cycle billing), consumption data provided is for bill generation (bill posting date) from 1st March to 30th March. These energy sales will pertain to the period which will comprise on an average half of February 2024 and half of March 2024.

3.3 The monthly and cumulative sales for major consumer categories are shown below in the Table 2 below:

Table 2: Monthly and Cumulative Sales for major Consumer Categories (MU)

Year\ Sales (MU)	Residential	Commercial	Industrial	Others	Total (FY 2023-24)	Total (FY 2022-23)
Monthly Approved	409.00	306.02	121.05	79.40	915.46	772.24
Actual - April, 2023	415.29	276.27	104.27	47.02	842.85	796.26
Actual - May, 2023	468.73	285.83	106.62	48.82	910.00	865.26
Actual - June, 2023	514.32	301.24	96.37	50.57	962.51	897.75
Actual - July, 2023	427.39	261.12	96.46	49.39	834.36	753.04
Actual - August, 2023	398.07	264.11	115.54	51.63	829.35	733.94
Actual - September, 2023	408.96	256.89	103.96	46.72	816.53	749.65
Actual - October, 2023	435.39	282.12	85.01	52.56	855.08	793.39
Actual - November, 2023	457.68	274.32	94.38	47.27	873.65	691.70
Actual - December, 2023	387.12	262.23	88.16	42.22	779.74	703.30
Actual-January, 2024	348.26	249.56	88.83	39.07	725.73	657.87
Actual-February, 2024	327.14	238.89	81.62	35.45	683.11	637.92
Actual-March, 2024	340.98	253.86	102.96	38.71	736.51	770.59
Approved - Cumulative till March 2024	4,907.98	3,672.19	1,452.59	952.75	10,985.51	9,266.90
Actual - Cumulative till March 2024	4,929.35	3,206.46	1,164.17	549.43	9,849.41	9,050.68



4. **Power Purchase Details**

4.1 The Commission in its MTR Order dated 31 March, 2023 in Case No. 231 of 2022 had approved the Power Purchase by AEML-D for FY 2023-24 from the following list of sources to meet its demand:

- a) Purchase from Adani Dahanu Thermal Power Station (ADTPS)
 - b) Renewable energy procurement (RPS) including Solar and Non-solar
 - c) Bilateral Contracts, Banking of power, and Imbalance pool
 - d) Medium-Term Power Purchase and Short-Term Power Purchase
- Apart from above, there are incidental purchases from Open Access and Rooftop.

4.2 Summary of power purchase of AEML-D is as shown in Table 3 below:

Table 3: Summary of Power Purchase for March 2024

Sr. No.	Particular	Compliance																																
1	Purchase from Approved Sources	Yes. AEML-D has procured power from ADTPS, AEL-MTPP, Solar and Non-solar Sources and Bilateral sources in the month of March 2024, which are approved sources of power purchase.																																
2	Merit Order Dispatch	Yes. AEML-D had scheduled power as per MoD. With regards to the interstate contracts, as mentioned in the preceding month's FAC approvals, all Interstate contracts viz. RE Hybrid (700 MW), DSPPL (40 MW), AEL-MTPP (500 MW) and other short-term transactions are being scheduled under GNA/ T-GNA, from October 2023.																																
3	Fuel Utilization Plan	There is only one thermal generating station of AEML-G, and it has sourced raw / washed coal during the month based upon the availability. Hence there is no scope for improvement in optimal fuel utilization.																																
4	DSM Pool	AEML-D has drawn 11.72 MU from the DSM pool as per DSM mechanism.																																
5	Sale of Surplus Power	AEML has made sale of 180.92 MUs of surplus power during the month of March 2024.																																
6	Power Purchase	Actual Power Purchase is 866.43 MUs as against approved 1044.45 MUs.																																
7	Source wise Power Purchase	<table border="1"> <thead> <tr> <th>Source Name</th> <th>Approved (MU)*</th> <th>Actual (MU)</th> <th>Proportion of each Source in Actual Purchase</th> </tr> </thead> <tbody> <tr> <td>ADTPS</td> <td>307.02</td> <td>239.08</td> <td>27.59%</td> </tr> <tr> <td>RE Sources</td> <td>341.30</td> <td>315.44</td> <td>36.41%</td> </tr> <tr> <td>AEL-MTPP#</td> <td>366.00</td> <td>276.81</td> <td>31.95%</td> </tr> <tr> <td>Bilateral and Banking@</td> <td>131.38</td> <td>203.88</td> <td>23.53%</td> </tr> <tr> <td>Bilateral Sale</td> <td>(101.25)</td> <td>(180.92)</td> <td>-20.88%</td> </tr> <tr> <td>DSM Pool & Other</td> <td>-</td> <td>12.13</td> <td>1.40%</td> </tr> <tr> <td>Total</td> <td>1,044.45</td> <td>866.43</td> <td>100.00%</td> </tr> </tbody> </table> <p>*The power purchase quantum/cost approved in MTR Order on yearly basis, however monthly approved numbers are derived from comparison purpose. # The Commission has, vide order dated 29-08-2022 in Case No. 149 of 2022 on the petition filed by AEML-D, approved purchase of 500 MW medium term power for the period 1-9-2022 to 14-10-2024. The power flow has accordingly commenced.</p>	Source Name	Approved (MU)*	Actual (MU)	Proportion of each Source in Actual Purchase	ADTPS	307.02	239.08	27.59%	RE Sources	341.30	315.44	36.41%	AEL-MTPP#	366.00	276.81	31.95%	Bilateral and Banking@	131.38	203.88	23.53%	Bilateral Sale	(101.25)	(180.92)	-20.88%	DSM Pool & Other	-	12.13	1.40%	Total	1,044.45	866.43	100.00%
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Sr. No.	Particular	Compliance
		@ Includes 202.69 MU of power banked with AEML-D under the banking arrangement with MPL-RUNVL, MPL- PSPCL and MPL (source- BYPL and PSPCL). Accordingly total energy booked under the banking arrangement in March 2024 is 196.21 MUs without any corresponding cost. Further, 6.48 MUs has been banked with ASL in March 2024. The cost related to this Banking quantum has not been considered separately as the energy is banked from the power available from the existing portfolio of AEML and its cost is therefore already included in the power purchase cost for the month of March 2024. Accordingly, net banking quantum of 196.21 MU has been considered by AEML-D in March 2024.
8	Power Purchase under Section 62 of Electricity Act, 2003	AEML-D is purchasing power from only one source i.e., ADTPS under Section 62 of EA, 2003. As part of verification of fixed cost claimed by AEML-D, the same has been verified from the AEML-D MTR Order in Case No. 231 of 2022.As part of verification of energy charges claimed by AEML-D, operational parameters, fuel cost, GCV, etc is verified from the AEML-G MTR Order Case No. 229 of 2022.
9	RE Purchase	Monthly power purchase invoices are submitted by AEML-D. Power Purchase rates are verified from the PPA signed by AEML-D with contracted sources of power. For short-term RE power sourced from exchange and short-term power purchase RE contracts, monthly power purchase quantum and rate are verified from the invoices, and it is ensured that same has been considered in the FAC calculation.
10	Short Term Power Purchase	Short-term power purchase invoices (from exchange and other sources) of March 2024 are submitted by AEML-D. All the power purchase quantum and rate are verified from the invoices, and it is ensured that same has been considered in the FAC calculation.

4.3 **AEML-D has purchased 866.43 MUs of power as against approved 1044.45 MUs from the sources approved by the Commission.**

5. Power Purchase Cost

5.1 The Commission has scrutinised the detailed bills/invoices submitted for power purchase during the month of March 2024, in order to verify the claim of AEML-D 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 As submitted by AEML-D, the **Power Purchase cost incurred in March 2024 is Rs. 353.24 Crore** which is lower than the **approved Power Purchase cost of Rs. 447.99 Crore** by the Commission for the month of March 2024. This is primarily on account of the banking transactions undertaken in March 2024 wherein while the energy was received by AEML-D, there was no cost associated with it presently. As against the submission of AEML-D, the approved and actual Quantum of power purchase (MU), Power Purchase Cost (Rs. Crore) and Average Power Purchase Cost (Rs./kWh) for the month of March 2024 is shown in Table 4 below:



Table 4: Approved and Actual APPC and Power Purchase Quantum & Cost

Particulars	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)
ADTPS	Approved	307.02	30.45	0.99	123.33	4.02	153.78	5.01
	Actual	239.08	30.45	1.27	88.98	3.72	119.43	5.00
Solar and Non-Solar Purchase	Approved	341.30	-	-	122.64	3.59	122.64	3.59
	Actual	315.44	-	-	114.61	3.32	114.61	3.63
AEL MTPP	Approved	366.00	81.51	2.23	110.77	3.03	192.28	5.25
	Actual	276.81	83.64	3.02	86.53	3.13	170.17	6.15
Banking Cost / Banking Return [#]	Approved	70.50	-	-	-	-	-	-
	Actual	196.21	-	-	-	-	-	-
Bilateral Purchase	Approved	60.88	-	-	31.23	5.13	31.23	5.13
	Actual	7.68	-	-	4.52	5.89	4.52	5.89
Pool/ DSM	Approved	-	-	-	-	-	-	-
	Actual	11.72	-	-	4.85	4.14	4.85	4.14
OA/RTS/Banking OA and Trading margin	Approved	-	-	-	-	-	-	-
	Actual	0.41	-	-	0.10	2.38	0.10	2.38
Sale of Power	Approved	(101.25)	-	-	(51.94)	5.13	(51.94)	5.13
	Actual	(180.92)	-	-	(68.27)	3.77	(68.27)	3.77
Other Charges / Rebate / Addl InSTS charges	Approved	-	-	-	-	-	-	-
	Actual	-	-	-	7.83	-	7.83	-
Total	Approved	1,044.45	111.95	1.07	336.03	3.22	447.99	4.29
	Actual	866.43	114.09	1.32	229.36	2.65	353.24	4.08

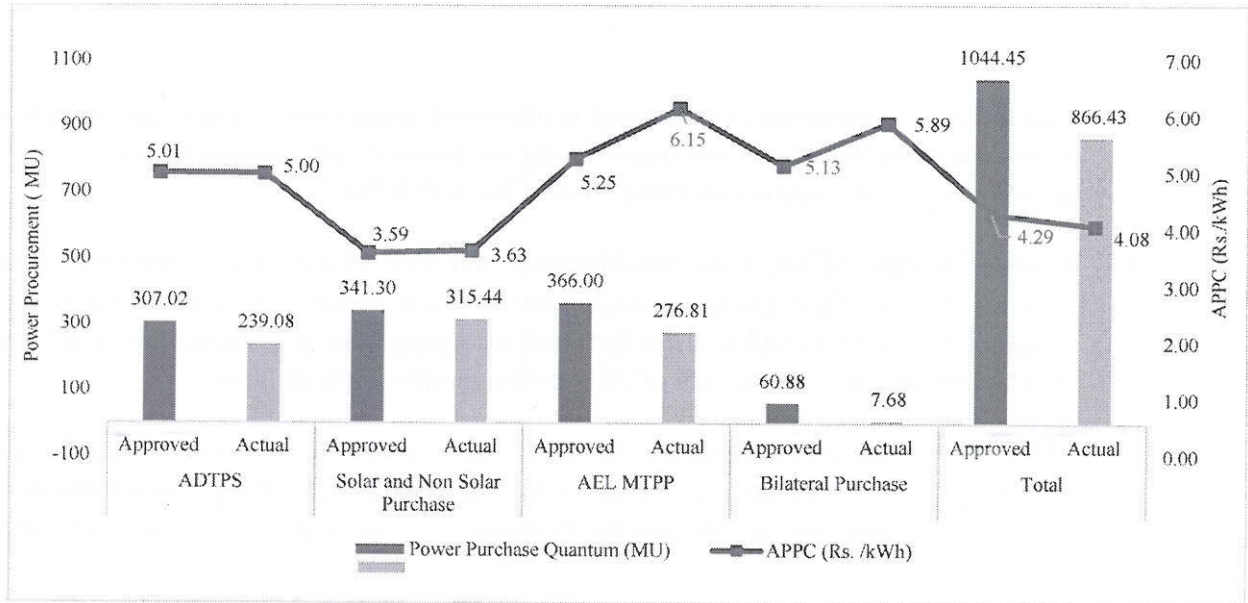
*In the case of AEML-D, there is no monthly approval for purchases. The monthly approved power purchase is computed based on the annual approved power purchase for comparison purpose.

[#] Includes 202.69 MU of power returned to AEML-D under the banking arrangement from MPL-RUNVI, MPL- PSPCL and MPL (source- BYPL and PSPCL). Accordingly total energy booked under the banking arrangement in March 2024 is 196.21 MUs without any corresponding cost. Further, 6.48 MUs has been banked with ASL in March 2024. The cost related to this Banking quantum has not been considered separately as the energy is banked from the power available from the existing portfolio of AEML and its cost is therefore already included in the power purchase cost for the month of March 2024. Accordingly, net banking quantum of 196.21 MU has been considered by AEML-D in March 2024.

5.3 The Figure 1 below shows the variation in Approved & Actual Power Purchased Quantum and Approved & Actual APPC for all the power purchase sources of AEML-D:



Figure 1: Approved & Actual Power Purchase and APPC for March 2024



5.4 AEML-D has submitted that Merit Order Despatch has been followed. As discussed in the FAC approval for previous months, all Interstate contracts viz. RE Hybrid (700 MW), DSPPL (40 MW), AEL-MTTP (500 MW) and other short-term transactions are being scheduled under GNA/ T-GNA, from October 2023. The Commission has noted the submission.

ADTPS

5.5 AEML-D has a PPA with ADTPS (own generation). The Commission in Case No. 231 of 2022 has approved monthly energy quantum of 307.02 MUs from ADTPS at the rate of Rs. 5.01/kWh. AEML-D has purchased 239.08 MU for the month of March 2024 at an average rate of Rs. 5.00/kWh.

5.6 **Fixed Cost:** The Fixed cost approved for FY 2023-24 in Case No. 229 of 2022 (AEML-G) is Rs. 365.35 Crore. The same has also been considered in the AEML-D Order in Case No. 231 of 2022.

5.7 **The actual PLF of ADTPS in March 2024 was 71.17% as compared to approved PLF of 92.90%.** ADTPS was available for generation during the month, the average Plant Availability Factor for the month (PAFM) for both Units of AEML-G was 100%. The actual Plant Availability Factor for the month (PAFM) for both units of AEML-G in March 2024 were 100% both during peak and off-peak hours. The cumulative availability for the period April 2023, May 2023 and March 2024 is 96.46% during peak hours and 96.92% during off peak hours. AEML-G has calculated the capacity charges for peak hours of the month and for off peak hours of the month payable for March 2024 as per Regulation 50.2 of the MYT Regulations, 2019. The capacity charges for peak hours works out to Rs. 6.09 Crore and the capacity charges for off-peak hours works out to Rs. 24.36 Crore, totalling Rs. 30.45 Crore.



- 5.8 **Due to lower generation as compared to approved generation, there is an increase of Rs. 0.28/kWh in the Fixed cost and accordingly the actual Fixed Cost per unit is Rs. 1.27/kWh as compared to the approved Fixed Cost of Rs. 0.99/kWh.**
- 5.9 **Energy Charges:** AEML-G has considered the normative operational parameters such as PLF, Availability, Auxiliary Energy Consumption (without FGD), Additional Auxiliary Energy Consumption for FGD, Station Heat Rate and Secondary fuel Oil Consumption as approved by the Commission in Case No. 229 of 2022 for the month of March 2024.
- 5.10 AEML-D has submitted documents to verify the quantity of coal purchased and total cost including breakup of all the cost such as washing charges, Coal handling charges, transportation charges and liaising charges incurred for Domestic Coal, as applicable, for the month of March 2024.
- 5.11 **Washed Coal:** AEML-D has submitted that AEML-G has received 92671.63 MT of washed coal at the plant boundary of ADTPS at a rate of Rs. 5,216.22 per MT and has consumed 79,229.80 MT of washed coal in March 2024.
- 5.12 "Other Charges" from the closing stock of the last month i.e., February 2024 amounting to Rs. 0.60 Crores have also been considered in the opening stock of the month of March 2024.
- 5.13 In the month of March 2024, Rs. 8,10,994/-, Rs. 3,96,146/- and Rs. 1,54,319/- have been included as an adjustment under freight charges for raw coal, freight charges for washed coal and coal loading charges respectively, on account of diesel escalation for February 2024. Further, Rs. (220)/- have been included as an adjustment under IGI due to short quantity analysis of washed coal made by IGI in February 2024. Also, Rs. (262540)/- have been considered as adjustment under QCI due to short quantity analysis done by QCI for the months of Sept 2023, Nov 2023 and Dec 2023.
- 5.14 The input tax credit (ITC) due to sale of coal rejects works out to Rs. (10,68,070)/- for March 2024 which has been considered as an adjustment under SECL coal purchase cost.
- 5.15 The ITC on GST paid through different invoices for the period December 2023 to March 2024 as well as the difference in ITC (difference between ITC claimed and revised ITC) for the period Apr 2023 to Nov 2023, amounting to Rs. (20,38,830)/- has been considered under respective heads in March 2024.
- 5.16 AEML-G has paid railway demurrage charges of Rs. 9,293/- in March 2024 pertaining to washed coal procured in February 2024. These charges are on account of detention of Railway's rolling stock after the expiry of free time for 4 no. of rakes containing washed coal and the same has been considered in the month of March 2024.
- 5.17 In March 2024, AEML-G received Debit and Credit notes for the period of April 2023 to Oct 2023 issued by SECL works out to be Rs. (2,05,89,940)/- which has been considered as an adjustment under SECL coal purchase cost.



- 5.18 The Commission has examined the invoices and the supporting excel working provided by AEML-D and has found it to be appropriate. The working of the washed coal fuel cost considered for March 2024 is as shown in the Table 5 below:

Table 5: Working of Washed Coal Rate for March 2024

Particular	Quantity (MT)	Cost (Rs. Crore)	Price (Rs./MT)
Inventory			
Opening (as on 1st March 2024)	86,822.19	47.35	5,453.32
Addition during month	92,671.63	48.34	5,216.22
Other Charges			
Total	179,493.82	95.69	5,330.91
Consumption			
Actual	79,229.80	41.97	5,297.70
Other Charges		0.10	
Total	79,229.80	42.08	5,310.80

- 5.19 The overall cost approved towards consumption of washed coal is Rs. 42.08 Crore for the month of March 2024.
- 5.20 **With regards to the washed coal, the weighted average landed cost for consumption in the month of March 2024 is Rs. 5,310.80/MT as compared to MTR approved Rs. 5,354/MT. AEML-D has consumed 79,229.80 MT of washed coal during the month of March 2024.**
- 5.21 AEML-D has considered the 'As billed' GCV of washed coal as 3,973 kCal/kg, while the 'As Received' GCV of same coal as per M/s IGI certificate (third party appointed by AEML-G for GCV measurement at receiving end) is 3,956 kCal/kg for March 2024. In MYT Order in Case No. 298 of 2019, the Commission has directed AEML-G to consider the GCV 'As Received' or 'As Billed', whichever is higher.
- 5.22 AEML-D has been considering the 'As Received' GCV of the opening stock of the washed coal and the 'As Received' GCV of the washed coal received during the month for working out the weighted average 'As Received' GCV of the coal for the month. The same was used to work out the stacking loss during the month. The Commission has also been approving the computation of GCV based on the same methodology. However, the Commission has adopted a different approach in the MTR Order for AEML-G in Case No. 229 of 2022.
- 5.23 The Commission in MTR Order in Case no. 229 of 2022 for AEML-G, has stated the following:

"4.10.17 Accordingly, the Commission has recalculated GCV (As Received Basis) on the coal procured during the month / year and the weighted average GCV so computed is considered for computation of stacking loss against the GCV (As Fired). The impact of opening / closing stock has not been considered while computing GCV (As Received Basis), the cyclical usage of the coal will nullify the impact in the going concern in future month / year."



- 5.24 Accordingly, in line with the FAC approval for August 2022 onwards, for the month of March 2024 the Commission has considered 'As Received' GCV of the coal received during the month and has not considered the impact of Opening stock for computing the weighted average 'As Received' GCV for a particular type of coal. Also, if a particular type of coal is not purchased in the month of reference (March 2024 in the present situation) but is consumed in that month from an older stock, then in such case 'As Received' GCV of that coal purchased in the most recent month (March 2024 or earlier, as applicable, in the present case) would be considered. In the present case, the washed coal was purchased in March 2024 and hence the GCV of this coal will be considered. The Commission has adopted this approach while approving the FAC submissions from August 2022 onwards for AEML-D. The Commission would also be following same approach while approving FAC for AEML-D in ensuing months as well.
- 5.25 In the submission done for the month of March 2024, AEML-D has considered the same approach for determining stacking loss as approved by the Commission. Accordingly, AEML-D has undertaken the Energy charge calculation for ADTPS for March 2024 in line with the above approach and submitted the same for approval of the Commission.
- 5.26 Accordingly, the 'As Billed' GCV of 3,973 kCal/kg for washed coal has been considered by the Commission for computing the weighted average GCV and further calculating the energy charge for the month of March 2024.
- 5.27 The transit loss claimed by AEML-D for the month of March 2024 is 660.29 MT which is 0.71% of the overall quantum of washed coal dispatched in that month.
- 5.28 The 'As fired' GCV of washed coal considered by AEML-D is 3,894 kCal/kg. Considering the difference between the 'As Received' GCV and the 'As Fired' GCV, the stacking loss for washed coal works out to 79 kCal/kg which within the limit of 120 kCal/kg.
- 5.29 **Raw Coal:** AEML-D has submitted detailed computation and methodology for booking the coal consumption cost. AEML-D has calculated the total coal consumption cost on the basis of Weighted Average Price Method by adding the purchases during the month in the opening inventory stock. The closing inventory is then obtained by deducting the coal consumed from the total of opening inventory and purchases during the respective month. AEML-D has purchased 1,12,391.90 MT Raw Coal (at plant boundary) from SECL and has consumed 1,10,874.54 MT of raw coal in March 2024. As per weighment of coal at ADTPS, the raw coal received is 1,12,391.90 MT and the weighment of coal dispatched by SECL was 1,13,348.92 MT. The difference is reported as the transit loss which is 957.02 MT which is 0.84% of the total coal dispatched during the month of March 2024.
- 5.30 As submitted in earlier FAC submissions, sometimes, during transit of coal from railway siding in Chhattisgarh to ADTPS, few wagons get detached from rakes due to various reasons and does not reach ADTPS. Later on, the missing wagons reach ADTPS and the coal quantity in the missing wagons is then accounted. For raw coal, AEML-G has considered additional coal received of 66.65 MT coal in received quantity. This pertains to extra one wagon of raw coal (wagon No. SE 43357) received against RR No. 162000542 dated 04.03.2024.



- 5.31 AEML-G has paid railway demurrage charges of Rs. 91,981/- for the month of March 2024. These charges are on account of detention of Railway's rolling stock after the expiry of free time for 5 no. of rakes containing raw coal and the same has been considered in the month of March 2024.
- 5.32 The working of the raw coal fuel cost considered for March 2024 is as shown in the Table 6 below:

Table 6: Working of Raw Coal Rate for March 2024

Particular	Quantity (MT)	Cost (Rs. Crore)	Price (Rs./MT)
Inventory			
Opening (as on 1st March 2024)	77,175.86	37.16	4,815.25
Addition during month	112,391.90	54.27	4,828.98
Total	189,567.76	91.44	4,823.39
Consumption			
Actual	1,10,874.54	53.48	4,823.39
Other Charges	-	(0.22)	-
Total	1,10,874.54	53.26	4,803.69

- 5.33 The overall cost approved towards consumption of raw coal is Rs. 53.26 Crore for the month of March 2024.
- 5.34 **With regards to the raw coal, the weighted average landed cost for consumption in the month of March 2024 is Rs. 4,803.69/MT.** AEML-D has consumed 1,10,874.54 MT of raw coal during the month of March 2024.
- 5.35 It has been observed that in March 2024, AEML-G has purchased raw coal from SECL only. AEML-D has considered the 'As billed' GCV of raw coal as 3,942 kCal/kg, while the 'As Received GCV' of same coal as per M/s IGI certificate (third party appointed by AEML-G for GCV measurement at receiving end) is 3,318 kCal/kg for March 2024. As per clause 50.6 of MYT Regulations, 2019, actual loss in GCV of coal between 'As Billed by Supplier' and 'As Received at generating station' is allowed subject to maximum loss of 300 kcal/kg. The GCV loss calculated by AEML- D (difference between 'As Billed' GCV and 'As Received' GCV) for raw coal for the month of March 2024 is 624 kCal/kg)
- 5.36 Hence, as mentioned above, the GCV loss (624 kCal/kg) for raw coal for the month of March 2024 is outside the limit of 300 kCal/kg and 'As Billed' GCV of 3,942 kCal/kg is considered for calculation (i.e., maximum of the 'As Received' GCV or 'As Billed' GCV minus 300 kCal/kg).
- 5.37 In accordance with the methodology mentioned in para 5.23 to para 5.25, the Commission has approved 'As Billed' GCV as 3,642 kCal/kg for raw coal. The 'As Fired' GCV of raw coal is 3,330 kCal/kg. The same has been used to work out the stacking loss of 312 kCal/kg for raw coal.
- 5.38 In the month of March 2024, Rs. (404)/- have been considered as an adjustment under IGI due to short quantity analysis of raw coal in March 2024. Further, AEML-D have considered Rs.



(3,55,198)/- under QCI due to short quantity analysis of coal made by QCI for the months of Nov 2023 and Dec 2023.

- 5.39 The ITC on GST paid through different invoices for the period Dec 2023 to Mar 2024 as well as the difference in ITC (difference between ITC claimed and revised ITC) for the period Apr 2023 to Nov 2023, amounting to Rs. (25,76,047)/- has been considered under respective heads in March 2024.
- 5.40 In March 2024, AEML-G received Debit notes for the period of April 2023 issued by SECL works out to be Rs. 1,20,317/- which has been considered as an adjustment under SECL coal purchase cost.
- 5.41 **Imported Coal:** AEML-G has neither purchased nor consumed any imported coal in March 2024. Also, there was nil quantum imported coal reported in opening inventory of the month of March 2024.
- 5.42 The differential ITC on GST (difference between ITC claimed in October 2023 and revised ITC for October 2023) amounting to Rs. (55,559)/- has been considered under respective heads for the month of March 2024.
- 5.43 **LDO:** AEML-G has neither purchased nor consumed any LDO in March 2024. The working of the LDO fuel cost considered for March 2024 is as shown in the Table 7 below:

Table 7: Working of LDO Rate for March 2024

Particular	Quantity (KL)	Cost (Rs. Crore)	Price (Rs./KL)
Inventory			
Opening (as on 1st March 24)	439.35	3.25	73,995.24
Addition during month	-	-	-
Total	439.35	3.25	73,995.24
Consumption			
Actual	-	-	-
Other Charges	-	-	-
Total	-	-	-

- 5.44 The overall cost approved towards LDO expense for the month of March 2024 is **nil**.
- 5.45 As per MYT Regulations, 2019 for calculation of Energy Charge Rate, the Commission has notified the maximum stacking loss allowed in Clause 50.7 as reproduced below:

“Any variation in Price and Gross Calorific Value of coal/lignite or gas or liquid fuel as billed by supplier less actual stacking loss subject to the maximum stacking loss of 85 kcal/kg or 120 kcal/kg, as the case may be, vis-a-vis approved values shall be adjusted on month to month basis on the basis of average Gross Calorific Value of coal/lignite or gas or liquid fuel in stock received and weighted average landed cost incurred by the Generating Company for procurement of coal/lignite, oil, or gas or liquid fuel, as the case may be for a power Station.”



- 5.46 In line with MYT Regulations, 2019 and MYT Order in Case No. 298 of 2019, the Commission has considered stacking loss of 120 kcal/kg (minimum of actual weighted average loss considering washed coal, raw coal, and imported coal of 214.89 kCal/kg or 120 kCal/kg as per Regulation) for calculation of energy charge rate.
- 5.47 Considering the approved rates for washed coal, raw coal, imported coal and LDO, the fuel cost, GCV and normative operational parameters, the **energy charges** work out to **3.722/kWh** which is lower than the approved variable cost of Rs. 4.017/kWh as per the MTR Order for AEML-G (Case No. 229 of 2022).
- 5.48 **Incentive:** As per Regulation 46.3 of MYT Regulations, 2019 specifies the target PLF of 85%. Since the PLF for March 2024 was less than 85% (both in peak hours and off-peak hours), AEML-G has not claimed any incentive for March 2024.
- 5.49 Variation in power purchase expenses from ADTPS on account of change in quantum and per unit rate is as shown in Table 8 below:

Table 8: Variation in Power Purchase expenses from ADTPS for March 2024

Source	Approved Quantum (MU)	Approved rate (Rs./kWh)	Actual quantum (MU)	Actual rate (Rs./kWh)	Variation due to quantum (Rs. Crore)	Variation due to rate (Rs. Crore)	Total variation (Rs. Crore)
ADTPS	307.02	5.01	239.08	5.00	(34.03)	(0.32)	(34.35)

- 5.50 Based on the above, **APPC for ADTPS works out to Rs. 5.00/kWh as against approved Rs. 5.01/kWh. There is a decrease of Rs. 0.01/kWh in APPC for the month of March 2024. Fixed cost variation is contributing to increase of Rs. 0.28/kWh and variable cost variation is contributing Rs. 0.30/kWh to the decrease.** The decrease in variable cost is due to use of low cost raw and washed coal in the month of March 2024.
- 5.51 **Power from other generator (AEL- MTPP):** AEML-D has submitted that the Commission has, vide order dated 29 August, 2022 in Case No. 149 of 2022 on the petition filed by AEML-D, approved the purchase of 500 MW medium term power for the period 1 September, 2022 to 14 October, 2024. Power flow has commenced and accordingly power purchase of **276.81 MUs** and the associated cost of Rs. 170.17 Crore has been considered in the March 2024 month FAC by AEML-D.
- 5.52 **Solar Purchase:** AEML-D has an Energy Purchase Agreement (EPA) with Dhursar Solar Power Private Limited (DSPPL). The Commission has approved power purchase at the rate of Rs. 10.30/kWh from DSPPL. **AEML-D has purchased 5.49 MUs from DSPPL at the same rate of Rs. 10.30/kWh as approved in the MTR Order.** The Commission has verified the bills/invoices submitted and found them to be correct.
- 5.53 **Wind Solar Hybrid:** AEML also has PPA with Adani Hybrid Energy Jaisalmer Four Limited for 700 MW. The Commission has approved renewable power purchase quantum of 285.85 MUs at the rate of Rs. 3.24/kWh from wind solar hybrid for FY 2023-24. The project has fully



commissioned with Hybrid capacity of 700 MW. AEML-D has purchased 275.18 MUs in the month of March 2024 from wind solar hybrid source at the same rate of Rs. 3.24/kWh as approved in the MTR Order.

- 5.54 **Non-Solar Purchase:** AEML-D also has an EPA with three non-solar sources namely Vector Green Energy Private Limited, Tembhu Power Private Limited, and Reliance Clean Power Private Limited. The Commission has approved power purchase from these non-solar sources in the MTR Order. The actual APPC and approved APPC from all the sources is as shown in the Table 9 below:

Table 9: Approved and Actual APPC from Non-Solar Sources

Source	Approved (Rs./MT)	Actual (Rs./MT)
Vector Green Energy Private Limited (April 2009)	5.07	-
Tembhu Power Private Limited	4.26	4.26
Reliance Clean Power Limited	5.81	5.81

- 5.55 The Commission has approved power purchase rate for Vector Green Energy Private Limited, and Reliance Clean Power Private Limited in the MTR Order in Case No. 231 of 2022. AEML-D has procured 2.48 MUs power from Reliance Clean Power Private Limited at the same rate (Rs. 5.81/kWh) during March 2024. No power has been purchased from Vector Green Energy Private Limited during March 2024. Further, 0.55 MUs of power has been procured from Tembhu Power Pvt. Ltd. during March 2024 at the rate of Rs. 4.26/kWh.
- 5.56 **Short Term Contracts for RE power:** AEML-D in the MTR Petition in Case No. 231 of 2022 had submitted that it is exploring tie up of Short-Term Wind power from generators located in Maharashtra and had estimated quantum of approximately 526 MU at the purchase rate of Rs. 2.94/kWh. The Commission, in its Order, approved the quantum as estimated by AEML-D, however, the rate approved was Rs. 4.90/kWh, considering the average GDAM rate from July 2022 to December 2022.
- 5.57 AEML-D submitted in the FAC application that it had contracted Intrastate Non-Firm Wind capacity up to 353 MW in March 2024 on short term basis. Out of total contracted capacity, part of the power has been contracted through competitive bidding while the remaining has been contracted through day-ahead exchange linked contract (DAM). Through such as exchange linked contract, the trading margin of IEX is also saved. In support of the same, AEML-D has submitted Letters of Intent (LOIs) issued to the generators. AEML-D has stated that the bill/ invoice against the said contract/LOI was not received, as GCN has not been received by the seller from MSEDCL. Thus, since the quantum is not known at this point of time, AEML-D has estimated it in proportion to the generation capacity of sources. A working of this estimation as submitted by AEML-D is provided below:



Table 10: Estimation of STPP RE procured in proportion to capacity

Particular	Energy (MU)	Remark
Total RE Capacity (Contracted + OA)	56.35	Provisional Actual REMC as per SLDC DSM bill data (A)
OA (LT+MT+ST)	21.87	Provisional Actual REMC in proportion of Capacity (B)
Contracted (LT + ST)	34.48	Provisional Actual REMC in proportion of Capacity (C)
Contracted RE (LT)	3.03	Actual RE Energy as per Bills (D)
Contracted RE (ST) by AEML-D (352.13 MW)	31.45	Estimated ST RE Energy (C – D)

- 5.58 Further, the cost against the power procurement these sources is not claimed in this month, since invoices are not received. AEML-D has submitted that once the invoices are received, the cost will be claimed in the month in which payment is made. Accordingly, a few bills pertaining to the months of July 2023 to February 2024 were paid in the month of March amounting to Rs. 8.23 crore and the same are considered as part of power purchase cost in the month of March 2024.
- 5.59 In the approval of FAC for the month of December 2023, the Commission in the matter of purchase of power from STPP-RE source had stated the following:

“5.65 However, as discussed in the approval Of FAC for the month Of April 2023, the approach adopted presently by AEML-D leads to a situation where in the month in which the units are considered without any corresponding cost, the power purchase cost (Rs./kWh) is understated and vice-versa in the month in which the cost is reported without any corresponding units.

5.66 To avoid such situation, AEML-D is directed to consider both (units as well as cost), albeit based on assumption, to minimise the impact of this variation and to adopt this approach appropriately in the future months for which filing has not been done yet.

5.67 Further, AEML-D is also directed to submit reconciliation in its future FAC submissions providing the month-wise energy estimated by AEML-D, actual energy as per the bills received and actual cost as per the bills etc.”

- 5.60 Accordingly, AEML-D was directed in the December 2023 FAC approval report (issued on 19 April 2024) to consider both (units as well as cost), albeit based on assumption, to minimize the impact of this variation and to adopt this approach appropriately in the future months for which filing was not done. AEML-D was also directed to submit reconciliation in its future FAC submissions providing the month-wise energy estimated by AEML-D, actual energy as per the bills received and actual cost as per the bills etc.
- 5.61 Accordingly, AEML-D was again directed to provide the status of compliance with the approach as directed by the Commission.



5.62 In response to the query raised by the Commission, AEML acknowledged the direction of the Commission and submitted that in the FAC computation submitted to months of March 2024 to May 2024, it had inadvertently not considered the cost of short-term RE on provisional basis. Accordingly, AEML-D outlined the following methodology for considering the same while approving FAC:

- For short-term RE purchased during FY 2023-24, actual invoices have been received in various months in FY 2023-24 and have continued to be received in FY 2024-25 as well.
- On the basis of the invoices received for FY 2023-24, the per unit average works out to approx. Rs. 2.97/unit.
- The above rate is considered for the month of March 2024 for estimated quantum of 31.45 MU and accordingly the cost estimated cost is Rs. 9.34 crore.
- Similar changes will also be incorporated for April 2024 and May 2024.

5.63 AEML-D has further highlighted significant difficulties regarding following the approach directed by the Commission in response to the data gaps for March 2024 and requested the Commission to allow continuing the approach considered by AEML-D of considering the cost only on receipt of invoice from the generator. Some of the key issues highlighted by AEML-D include the following:

- AEML-D purchases short-term RE from a wide variety of generators under LOIs. Each LOI contains multiple sources (sometimes ranging 40 to 50) and there could be multiple generators / machines under each source. The Generation Credit Note (GCN) issued by MSEDCL is given for each generator / machine separately. That makes up for a very large number of GCNs pertaining to any given month. A generator can send an invoice to AEML-D only after it receives GCN.
- MSEDCL takes a lot of time to issue GCNs to the generators. e.g. GCN for a generator for the month of April could arrive in the month of June next year or perhaps with even greater delay.
- The month-wise reconciliation of cost estimated for short-term RE and the actual cost as per bills received from generators could, therefore, take a very long time, because full reconciliation cannot be done till such time all bills are received.
- An even bigger issue of reconciliation will arise when a true-up petition is filed – e.g. the amount recovered through FAC based on provisional / estimated cost of short-term RE will get added to the revenue of such year, while the actual cost (which is dependent on bills, which is in turn dependent on issuance of GCN) will get added to the cost side only partially (basis actual bills received till the time of filing of true-up petition). This would mean that, upon true-up, the surplus will again get surrendered through the ARR back to the customers (as surplus will reflect in revenue gap). Now, bills for the said financial year could still continue to be received even after the true-up order is issued, but since the surplus is already surrendered, AEML-D will again need to claim the cost as per bills in FAC, on actual basis.

5.64 The Commission has noted the submission of AEML-D regarding complication and difficulties in following the approach directed by the Commission. However, the original approach adopted



by AEML-D leads to a situation where there could be fluctuations in FAC on account of consideration of cost towards this short term RE Power in random manner and without any proper co-relation or proportion to the quantum of this power considered for FAC purpose. This FAC fluctuation may lead to monthly variations in the Tariff payable by the consumers which would defeat the objective of FAC stabilization. To avoid such situation, AEML-D is directed to consider both (units as well as corresponding cost), albeit based on estimation, to minimise the impact of this variation and AMEL-D to adopt the approach directed by commission. Similar approach is being followed in case of other licensees as well and it is important to maintain consistency in approach to the extent possible.

- 5.65 Further, the Commission in the past has also taken a similar approach in the matter of considering FBSM charges on provisional basis (with quantum as well as the cost) to avoid burden on the consumers at a later point of time. Excerpts from the Commission's Post facto approval of Charges (FAC) for the period of January 2020 to March 2020 is reproduced below for reference:

"FBSM/Imbalance Pool:

4.38 The Commission observed that AEML-D has not considered any pool quantum and cost in FAC computation as the same being on provisional basis was disallowed by the Commission in previous post facto approvals (Q1 of FY 2018-19). However, AEML-D in its earlier submission (Q2 of FY 2018-19) has requested to consider these provisional entries as UI power is actually consumed and the rates of which are normally lower as compared to other sources of power. Thus, consideration of the same reduces the average power purchase cost and correspondingly reduce FAC burden on consumers. Accordingly, on request of licensee and also to avoid FAC burdens on consumers, the Commission has considered the power purchase quantum as well as the cost towards imbalance pool on provisional basis in post-facto approval of FY 2018-19.

4.39 In present approval as well, the Commission has continued with the same approach as adopted in previous post-facto approvals and has considered imbalance power purchase quantum as well as the cost on provisional basis. Also, with regards to FBSM rate the Commission has considered it as Rs. 3.50/kWh in line with the previous quarter post-facto approval."

- 5.66 Accordingly, the Commission is inclined to proceed with the approach suggested in the FAC approval for December 2024 and directs AEML-D to adopt the same in the future period. As regards the difficulties and concerns raised by AEML-D regarding delayed /non receipt of the GCNs from MSEDCL resulting into delayed/non-receipt of the invoices from the generators, it is directed that AEML-D shall take up this issue in the meetings of Open Access Committee and if still issue does not get resolved, then it is at liberty to approach the Commission during the upcoming MYT Petition wherein the Commission will have a chance to get feedback from all the stakeholders and licensees and decide on the standard approach to be adopted across all the licensees.



- 5.67 Accordingly, based on the approach adopted by AEML-D, for estimated quantum of 31.45 MU, the cost estimated shall be Rs. 9.34 crore for the month of March 2024. Some of the invoices pertaining to the transaction from this source in the months of July 2023 to February 2024 were paid in March 2024 amounting to Rs. 8.68 Crore. Accordingly, the total cost of Rs. 18.02 Crores is considered as part of power purchase cost of STPP RE in the month of March 2024. The revised FAC working has been submitted by AEML-D after incorporating the necessary changes.
- 5.68 Accordingly, the Commission approves the power purchase of short term RE (market linked contracts and competitively discovered price) considered in the month of March 2024. However, AEML-D needs to track the market movements and ensure that the terms of the contract are beneficial for the consumers.
- 5.69 As the approval by the Commission is on yearly energy quantum, the monthly variation in power purchase from various sources of power is being accepted provided cumulative power procured from majority of the sources is within the approved energy quantum.
- 5.70 Variation in power purchase expenses from RE sources on account of change in quantum and per unit rate is as shown in Table 11 below:

Table 11: Variation in Power Purchase expenses from Renewable Energy Sources for March 2024

Source	Approved Quantum (MU)	Approved rate (Rs./ kWh)	Actual quantum (MU)	Actual rate (Rs./ kWh)	Variation due to quantum (Rs. Crore)	Variation due to rate (Rs. Crore)	Total variation (Rs. Crore)
Solar							
DSPPL	4.35	10.30	5.49	10.30	1.18	(0.00)	1.18
Adani Hybrid Energy Jaisalmer Four Limited - Wind Solar Hybrid (AHEJFL)	285.85	3.24	275.18	3.24	(3.46)	-	(3.46)
Non-Solar					-	-	-
Vector Green Energy Pvt Ltd	0.07	5.07	-	-	(0.03)	-	(0.03)
Tembhu Power Pvt. Ltd.	1.00	4.26	0.55	4.26	(0.19)	-	(0.19)
Reliance Power Ltd.	6.24	5.81	2.48	5.81	(2.18)	-	(2.18)
Short Term RE [#] and Exchange (G-DAM)	43.80	4.90	31.74	5.71	(5.91)	2.57	(3.34)
Total RE Sources	341.30	3.59	315.44	3.63	(10.60)	2.57	(8.03)

[#] This includes the provisional quantum (31.45 MUs) of power purchased from short term RE (intrastate non-firm) sources for which the invoices are not available. As directed by the Commission, AEML-D has now considered a provisional cost of Rs. 9.34 Crore against this quantum. Further, few bills pertaining to July 2023 to February 2024 were paid in March 2024 amounting to Rs. 8.68 Crore which were paid in March 2024 have been considered.



- 5.71 **APPC for renewable sources for the month of March 2024 works out to Rs. 3.63/kWh which is higher than MTR approved level of Rs. 3.59/kWh.**
- 5.72 **Bilateral Purchase:** AEML-D has undertaken bilateral purchase of power from power exchange (IEX and HPX), through exchange price linked bilateral contracts and inter-discom trade (BEST and ASL) at the average rate of Rs. 5.89/kWh which is higher than the approved rate of Rs. 5.13/kWh. It is observed that the average power prices in short term market are lower in March 2024 as compared to the prices observed during October 2023, November 2023, December 2023, January 2024 and February 2024 which is also reflected in the average price of power purchase in October 2023 (8.76/kWh), November 2023 (5.74/kWh), December 2023 (7.37/kWh), January 2024 (7.74/kWh) and February 2024 (6.52/kWh).

Figure 2: Exchange price trends (RTC)

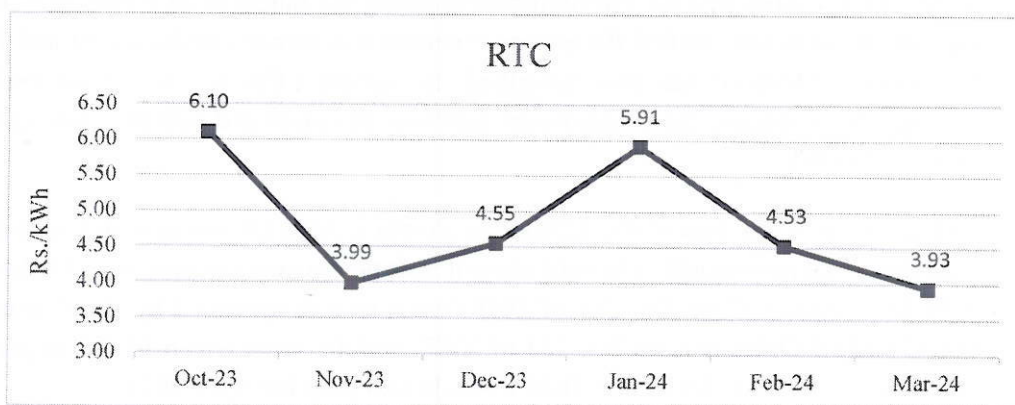


Table 12: Power Prices in short term market (Rs./kWh)

Month	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24
RTC	6.10	3.99	4.70	5.91	4.53	3.93
Evening (17-23 Hrs)	7.52	5.07	5.83	7.24	5.45	4.70
Day (10-17 Hrs)	5.41	3.83	4.69	6.27	3.96	3.19
Night (0-6, 23-34 Hrs)	5.79	3.12	2.79	2.94	2.97	3.62
Morning (6-10 Hrs)	5.72	4.17	6.37	8.47	6.86	4.62

- 5.73 AEML-D has purchased 7.68 MUs through bilateral purchase (IEX, HPX, exchange linked contracts and Inter Discoms Trade) which is 0.89% of its total power purchase for March 2024. The summary of the power procured from the various short-term sources is reproduced in the table below:

Table 13: Summary of power procured from short term sources

Sr. No.	Source	Net Purchase (MU)	Power Purchase Cost (Rs. Crore)	Average Power Purchase Cost (Rs./kWh)
Bilateral Sources				
1	IEX	6.94	2.60	3.74
2	PXIL	-	-	-
3	HPX	0.19	0.11	5.80



Sr. No.	Source	Net Purchase (MU)	Power Purchase Cost (Rs. Crore)	Average Power Purchase Cost (Rs./kWh)
4	STPP ASL	0.08	0.02	2.17
5	STPP BEST	0.46	0.40	8.73
7	Exchange sale cost		0.43	-
8	MSLDC Fees, SLDC schedule charges and OA charges for STPP	-	0.96	-
	TOTAL	7.68	4.52	5.89

- 5.74 AEML-D has submitted the bill/invoices regarding the purchase of power from exchange and the Commission has verified the energy quantum and power purchase cost and found it to be appropriate. AEML-D has also submitted the sample LOIs for day ahead exchange linked contract. Accordingly, the Commission approves the aforesaid bilateral purchase with APPC of Rs. 5.89/kWh.
- 5.75 AEML-D has to pay fees of Rs. 7,500/- per month to MSLDC towards IEX standing clearance in advance, for next month. The said amount is as per the amount approved by the Commission in SLDC Order in Case No. 291 of 2019 (same as that approved by the Commission in the SLDC's MTR Order in Case No. 233 of 2022) and the same is considered as part of Bilateral purchase cost in FAC for March 2024 towards fees paid for April 2024.
- 5.76 Additionally, AEML-D received a past bill from MSLDC for scheduling and rescheduling charges as per clause no. 6.2.8 of the Commission's Order in Case No. 219 of 2019 dated 30.03.2020 amounting to Rs. 6,26,000/- for February 2024. This is proposed to be considered as part of Bilateral power purchase cost, in FAC for March 2024. The Commission has noted the submissions.
- 5.77 Variation in power purchase expenses from bilateral sources on account of change in quantum and per unit rate is as shown in Table 14 below:

Table 14: Variation in Power Purchase expenses from bilateral sources for March 2024

	Approved Quantum (MU)	Approved rate (Rs./kWh)	Actual quantum (MU)	Actual rate (Rs./kWh)	Variation due to quantum (Rs. Crore)	Variation due to rate (Rs. Crore)	Total variation (Rs. Crore)
Bilateral Purchase	60.88	5.13	7.68	5.89	(27.29)	0.58	(26.71)

- 5.78 **Banking Return:** AEML-D has entered into a banking arrangement wherein AEML-D will bank 75 MW power with MPL-PSPCL over the period 24th July 2023 to 30th September 2023. Under the arrangement, the return of banked power by MPL-PSPCL shall be from 21st October 2023 to 31st December 2023 and from 1st March 2024 to 15th April 2024 with the return percentage at 105% of banked energy at delivery point i.e. Regional Periphery. Under this contract, for the month of March 2024, AEML-D has received 33.04 MUs and accordingly has considered the same in March 2024 month's FAC.



- 5.79 Further, AEML-D has also entered banking arrangement for up to 200 MW wherein MPL (source- BYPL and PSPCL) will be banking power from October 2023 to December 2023 and 1st March 2024 to 15th April 2024. The return of banked power at 105% by AEML-D will be from 20th June 2024 to 30th September 2024. Under this contract, for the month of March 2024, quantum of 124.97 MU (53.21 MU - BYPL and 71.76 MU - PSPCL) has been received by AEML-D.
- 5.80 Further, AEML-D has entered into a banking arrangement wherein AEML-D will bank 200 MW power during 06:00 to 18:00 hours with MPL-RUVNL over the period 1st November 2023 to 29th February 2024. Under the arrangement, the return of banked power by MPL-RUVNL shall be from 15th March 2024 to 30th June 2024 with the return percentage at 102% of banked energy at delivery point i.e. Regional Periphery. Under this contract, for the month of March 2024, AEML-D has received 44.68 MU.
- 5.81 AEML-D has not considered the cost related to the banking quantum separately, since the banking quantum is supplied from the power available from the existing portfolio of AEML and its cost is therefore already included in the power purchase cost for the month of March 2024. The Commission has noted the submission.
- 5.82 The breakup of the total of **202.69 MUs** of banked quantum is shown below in

Particular	Banking (MU)
Banking Return power (MPL- PSPCL)	33.04
Banking arrangement (BYPL and PSPCL)	124.97
Forward Banking (MPL-RUVNL)	44.68
Total	202.69

- 5.83 Further, AEML-D has also banked 6.48 MU with ASL in the month of March 2024 from the power available through purchases from its existing contracts. This power shall be returned by ASL from July 2024 to September 2024. The cost related to the Banking quantum has not been considered separately as the energy is banked from the power available from the existing portfolio of AEML and its cost is therefore already included in the power purchase cost for the month of March 2024. **Thus, the total net banked power amounts to 196.21 MU in the month of March 2024.**
- 5.84 **DSM Pool:** AEML-D has submitted that for the month of March 2024, it has drawn 11.72 MUs from the pool under the DSM mechanism and has incurred cost of Rs. 4.85 Crore.
- 5.85 **Power Procurement from Open Access and Roof Top Solar Consumers:** As per MERC (Distribution Open Access) (First Amendment) Regulations, 2019:

"20.5. The unutilised banked energy at the end of the month, limited to 10% of the actual total generation by such Renewable Energy generator in such month, shall be considered as deemed purchase by the Distribution Licensee at a rate equivalent to that stipulated under yearly Generic RE Tariff Order applicable for respective technology..."



...Provided further that provision relating to Banking of the Principal Regulations shall continue to apply for existing Open Access Agreements or contracts as on date of notification of the first amendment of the Principal Regulations, till the expiry of the approved period for such OA transactions, beyond which provision relating to Banking under Regulation 20 of the first amendment of the Principal Regulations shall apply."

Further, as per MERC (Net Metering for Roof-top Solar Photo Voltaic Systems) Regulations, 2015:

"10.3. The unadjusted net credited Units of electricity as at the end of each financial year shall be purchased by the Distribution Licensee at its Average Cost of Power Purchase as approved by the Commission for that year, within the first month of the following year."

- 5.86 The surplus energy of Roof-Top Solar and RE Open Access consumers (Firm and Non-firm) purchased by AEML-D as per the aforementioned regulations is 0.41 MU at a cost of Rs. 0.10 Crore and is considered in the FAC for the month of March 2024. AEML-D has submitted the details of the power procured as a part of the submission which has been verified based on consumer wise detail provided by AEML-D.
- 5.87 **Sale of Power:** AEML has sold 180.92 MUs under bilateral transaction and received Rs. 68.27 Crores for the month of March 2024 at the average rate of 3.77/kWh which is lower than the approved rate of 5.13/kWh.
- 5.88 The Commission, vide MTR Order for AEML-D, has approved the sale of surplus power at Rs. 5.13/kWh (at the same rate of bilateral short term power purchase rate), however, the actual rate realised for sale of power (Rs. 3.77/kWh) is below actual bilateral purchase rate of Rs. 5.89/kWh for March 2024).
- 5.89 In response to the query raised by the Commission in this regard, AEML-D has stated that at AEML, during day ahead planning, availability from all the contracted sources (LT/MT/ST) is first mapped against the forecast demand and, if there is Surplus/shortfall, then only day ahead power Sale/Purchase is undertaken through power exchange or through bilateral contracts, if any. During Intraday operations, based on variation in demand & REMC schedule, real time surplus/shortfall is bid on Realtime market (RTM) to minimize deviation in pool under DSM Regulations.
- 5.90 AEML demand varies across the day. Similarly, the availability from generators also varies during the day, especially from RE Generators, wherein it is maximum during daytime and lower during evening and night. Therefore, surplus is generally observed during solar hours of the day due to solar generation component of RE Hybrid. Surplus power is also higher during Sundays & Holidays due to lower demand as compared to availability from contracted sources. Shortfall is generally observed during non-solar hours i.e. evening and nighttime. Therefore, Day Ahead /Intraday purchase is undertaken only in case of shortfall w.r.t. forecast demand and sale is undertaken only if in surplus.



- 5.91 The contracted sources generally have Fixed cost and variable cost; however, the surplus sale rate is decided based on the variable cost only. If the sale realization rate is lower than the variable cost, AEML undertakes backing down upto technical minimum for all contracts wherever possible. However, RE contracts are must absorb contracts and Inter-State Bilateral contracts cannot be revised on Day ahead/intraday basis, hence they are also must absorb contracts. Generally, AEML undertakes sale only if the sale realization rate is higher than the variable cost of marginal Generator. However, if the surplus is arising from the technical minimum/ must absorb quantum/ SLDC instructions, then it must be sold at the available market rate else it goes into DSM pool at zero rate as it cannot be backed down.
- 5.92 The rates mentioned in the data gap are composite rate (FC+VC), hence purchase rate appears to be higher than the sale realization rate. However, in reality by undertaking sale transaction AEML has optimized the overall cost because the sale realization rate is higher than variable cost of marginal generation, except in case of must absorb sale time blocks.
- 5.93 The Commission has noted the submissions of AEML-D and opines that the sale of excess power should not lead to undue burden on the consumers on account of the difference in the cost of purchase and sale. With commencement of power flow from medium term PPA source, AEML-D appears to be in surplus and has been selling a significant amount of surplus power. **Therefore AEML-D, subject to technical constraints, should ensure that the consumers are not adversely impacted on account of the above stated issues.**
- 5.94 **Charges to CTU:** AEML-D has received a bill amounting to Rs. 10,56,31,945 from Central Transmission Utility (CTU) for Regional Transmission Account as per the CERC (Sharing of Inter-State Transmission Charges and Losses), Regulations, 2020. Since the bill pertains to the power sourced during March-24, the amount has been considered in the FAC for the month of March 2024. Commission has noted the submission.
- 5.95 **Charges to STU (MSETCL):** AEML-D has received a bill amounting to Rs. 70,66,247 from State Transmission Utility (CTU) for Regional Transmission Account in accordance with the Honourable Commission's Order dated 18-10-2020 in Case No. 52 of 2020. Since the bill is received during March-24, the amount has been considered in the FAC for the month of March 2024. Commission has noted the submission.
- 5.96 **Other Charges:** AEML-D has considered rebate pertaining to payments made towards power purchase from contracted generators of renewable energy, traders from short term power purchase, payment made for InSTS charges, SLDC charges etc. in the month of March 2024. Though AEML has submitted that there are no specific supporting bills showing the rebate. The rebate being claimed is considering the billed amount as per the invoices and the rebate available as per contracts/ invoice.
- 5.97 The Commission has scrutinized the details and has approved Rs. 3.78 Crore as rebate to be considered as part of power purchase cost for the month of March 2024. There is no standby previous year adjustment for the month of March 2024.



5.98 Summarised reasons for the rate variation for various sources are given in Table 15 below:

Table 15: Reasons for the rate variation for various sources for March 2024

Sr. No.	Source	Approved Rate (Rs. /kWh)	Actual Rate (Rs. /kWh)	Reason for rate variation
1	ADTPS	5.01	5.00	<ul style="list-style-type: none"> There is a decrease of Rs. 0.01/kWh in APPC for the month of March 2024. Fixed cost variation is contributing to increase of Rs. 0.28/kWh and variable cost variation is contributing Rs. 0.30/kWh to the decrease. The fixed charges are higher due to lower generation as compared to the approved generation.
2	RE Sources	3.59	3.63	<ul style="list-style-type: none"> RE power procurement from contracted sources Very less quantum of RE power procured through exchange platform. AEML-D contracted Intrastate Wind capacity with AEL in March 2024. As GCNs for March 2024 are not issued by MSEDCL, energy bills are not yet submitted by the generators and hence cost against this purchase is estimated at Rs. 2.97/kWh. Further, certain invoices were received in March 2024 for power procured from July 2023 to February 2024 and the cost pertaining to these invoices has been considered in the FAC of March 2024. This has led to increased rate.
3	AEL-MTPP	5.25	6.15	<ul style="list-style-type: none"> The rate of Rs. 5.25/kWh approved in the MTR Order was based on the actual effective rate obtained in the H1 of FY 2022-23 and the same rate was adopted for FY 2023-24 and FY 2024-25 as well. The PPA provides for change in the base fixed charges and variable charges linked to WPI. This also impacts the rate of purchase of energy.
4	Bilateral purchase excluding the impact of banking of power	5.13	5.89	<ul style="list-style-type: none"> Market discovered rate. Higher cost purchase of short-term power from Power Exchange (IEX and HPX), through day ahead exchange linked bilateral contracts and inter discom trade. The rate of power purchase without considering the impact of banking of power is Rs. 5.89/kWh.
5	Sale of surplus power	5.13	3.77	<ul style="list-style-type: none"> Market discovered rate;
	Total	4.29	4.08*	Variation due to above reasons

* Includes 202.69 MU of power banked with AEML-D under the banking arrangement with MPL-RUNVL, MPL- PSPCL and MPL (source- BYPL and PSPCL). Accordingly total energy booked under the banking arrangement in March 2024 is 196.21 MUs without any corresponding cost. Further, 6.48 MUs has been banked with ASL in March 2024. The cost related



to this Banking quantum has not been considered separately as the energy is banked from the power available from the existing portfolio of AEML and its cost is therefore already included in the power purchase cost for the month of March 2024. Accordingly, net banking quantum of 196.21 MU has been considered by AEML-D in March 2024.

5.99 Considering the above, the Commission allows the actual average power purchase cost of Rs. 4.08/kWh for the month of March 2024 as shown in Table 15 above as compared to approved average power purchase cost of Rs. 4.29/kWh.

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 month of March 2024 as shown in Table 15 above. The same has been compared with the average power purchase cost approved by the Commission in MTR Order dated 31 May, 2023 to arrive at the differential per unit rate at which Z_{FAC} is to be passed on to the consumers.

6.2 It is noted that AEML-D has incurred the per unit Power Purchase Cost lower than the approved per unit Power Purchase Cost hence the Z_{FAC} worked out by the Commission on account of difference in power purchase cost for the month of March 2024 is positive as shown in the Table 16 below.

Table 16: FAC on account of Power Purchase Cost

Sr. No.	Particulars	Units	March 2024
1	Average power purchase cost approved by the Commission	Rs./ kWh	4.29
2	Actual average power purchase cost	Rs. /kWh	4.08
3	Change in average power purchase cost (= 2-1)	Rs./ kWh	(0.21)
4	Net Power Purchase	MU	866.43
5	Change in power purchase cost (=3 x 4/10)	Rs. Crore	(18.39)

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

7.1 The adjustment for over recovery/under recovery has to be done for the (n-4) month as per provisions of MYT Regulations, 2019.

7.2 The Commission has allowed recovery of FAC leviable for the period April 2023 to June 2023 from March 2024 to May 2024 in its June 2023 FAC approval. The Commission has allowed recovery of FAC leviable for the period July 2023 to December 2023 from May 2024 to September 2024. Details of the actual recovery will be available once the actual recovery is done. Hence, the deferred over-recovery/under-recovery at the end of February 2024 to be adjusted in March 2024 is nil.

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

8.1 As there is no adjustment for over recovery/under recovery as mentioned in para 7.2 above, there is no carrying cost on account of such adjustment.



9. Disallowance due to excess Distribution Loss

9.1 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”

9.2 The following Table 17 provides the comparison of approved and actual distribution loss and disallowance due to excess distribution loss, if any:

Table 17: Disallowance of FAC due to excess Distribution Loss

Sr. No.	Particulars	Units	Approved in Tariff Order	Actual for Mar 2024	Cumulative up to Mar 2024	Annual Sliding Distribution Loss up to Mar 2024
1	Net Energy input at Distribution Voltages	MU	848.41	864.19	10404.51	10404.51
2	Energy sales at Distribution voltages	MU	790.72	736.51	9849.41	9849.41
3	Distribution Loss (1 - 2)	MU	57.70	127.68	555.10	555.10
4	Distribution Loss as % (3/1)	%	6.80%	14.77%	5.34%	5.34%
5	Excess Distribution Loss = [Annual Sliding Distribution Loss (4) - Distribution loss approved] x Net Energy Input (1)	MU	-	-	-	-
6	Disallowance of FAC due to excess Distribution Loss	Rs. Crore	-	-	-	-

9.3 As seen from the above Table 17, distribution loss for the month of March 2024 is 14.77% which is higher than the approved distribution loss of 6.80% in the MTR Order dated 31 March, 2023. Further, the annual sliding distribution loss up-to March 2024 is 5.34% which is also lower than the distribution losses approved in the MTR Order dated 31 March 2023. AEML-D submitted that the distribution losses are being reported considering the difference between the input and sales attributable to AEML-D’s own consumers. Further, the sales being reported for LT cycle billing is as per bill posting date, whereas the input will be pertaining to the concerned



month itself and thus there will be variation in losses on account of the differing period of purchase and sales.

- 9.4 As part of the analysis, monthly as well as cumulative distribution losses trend is also examined with reference to approved by the Commission and similar period of last financial year as shown in Table 18 below:

Table 18: Monthly and Cumulative Distribution Loss trend of AEML-D

Year	FY 2023-24	FY 2022-23
Approved	6.80%	7.05%
Actual – April	9.72%	12.47%
Actual – May	10.80%	11.48%
Actual – June	1.14%	-4.83%
Actual – July	-2.65%	2.70%
Actual - August	7.11%	7.14%
Actual - September	4.30%	6.10%
Actual – October	12.47%	7.40%
Actual – November	-3.61%	0.06%
Actual – December	0.58%	6.52%
Actual – January	0.84%	-2.06%
Actual – February	4.83%	8.81%
Actual – March	14.77%	11.24%
Actual - Cumulative till March	5.34%	5.92%

- 9.5 As seen from above Table 18, disallowance of FAC due to excess distribution loss for the month of March 2024 is nil. Though the standalone FAC for the month of March 2024 is negative, as the annual sliding distribution loss is lower than approved distribution loss by the Commission, there is no disallowance of FAC due to excessive distribution loss.

10. Summary of Allowable Z_{FAC}

- 10.1 The summary of the FAC amount as approved by the Commission for the month of March 2024 as shown in the Table 19 below.

Table 19: Summary of Allowable Z_{FAC} for March 2024

Sr. No.	Particulars	Units	As Claimed March 2024	As Approved March 2024
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	(18.39)	(18.39)
1.2	Carrying cost for over-recovery/under-recovery (C)	Rs. Crore	-	-
1.3	Adjustment factor for over-recovery/under-recovery (B)	Rs. Crore	-	-
1.4	Z_{FAC} = F+C+B	Rs. Crore	(18.39)	(18.39)
2	Calculation of FAC Charge			
2.1	Energy Sales within the License Area	MU	736.51	736.51
2.2	Excess Distribution Loss	MU	-	-
2.3	Z _{FAC} per kWh	Rs./kWh	(0.25)	(0.25)
3	Recovery of FAC			



Sr. No.	Particulars	Units	As Claimed March 2024	As Approved March 2024
3.1	FAC disallowed corresponding to excess Distribution Loss [(2.2 x 2.3)/10]	Rs. Crore	-	-
3.2	Allowable FAC	Rs. Crore	(18.39)	(18.39)
4	Utilization of FAC Fund			
4.1	Opening Balance of FAC Fund	Rs. Crore	207.71	206.75
4.2	Carrying cost on FAC Fund	Rs. Crore	1.76	-
4.3	Z _{FAC} for the month (Sr. No. 3.2)	Rs. Crore	(18.39)	(18.39)
4.6	Closing Balance of FAC Fund	Rs. Crore	191.08	188.36
4.7	Z _{FAC} leviable/refundable to consumer	Rs. Crore	191.08	188.36
5	Total FAC based on category wise and slab wise allowed to be recovered in future billing months	Rs. Crore	-	-
6	Carried forward FAC for recovery during future period (4.7-5)	Rs. Crore	191.08	188.36

10.2 It can be seen from the above Table 19 that opening FAC recoverable for month of March 2024 is Rs. 206.75 Crore and standalone FAC for the month of March 2024 approved by the Commission is Rs. (18.39) Crore. Accordingly, the FAC amount recoverable from the consumer for the month of March 2024 is Rs. 188.36 Cr. However, due to the reasons discussed earlier, the Commission has decided to carry forward and accumulate the FAC for a five-month period, along with the applicable carrying cost (excluding the period of delay). The accumulated FAC amount shall be recovered in the future billing months.

11 Recovery from Consumers:

11.1 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....”

- 11.2 The Commission allows the standalone FAC amount of Rs. (18.39) Crore for the month of March 2024.
- 11.3 In its FAC submission for the month of May 2024, AEML-D has requested the Commission to allow cumulative recovery of FAC for the period January 2024 to May 2024 and recovery of revised FAC from September 2024 onwards at FAC ceiling rate (20% of category energy charge) to ensure that accumulated revenue gap can be mopped up to the maximum possible and avoiding the impact of carrying cost on the accumulated amount. In this regard, AEML-D has also submitted that the Commission vide letter dated 19 April 2024, has approved the FAC for the period up to December 2023 and also has approved the category wise FAC for recovery for the billing months from May 2024 to August 2024 at the ceiling rate (20% of category energy charges) and considered the balance FAC amount of Rs. 20.23 crore to be recovered in the month of September 2024. AEML-D has suggested that the amount allowed to be recovered in September 2024 (Rs. 20.23 Crore) should be clubbed with the FAC accumulated for the period January 2024 to May 2024 and allowed for recovery in the months of September 2024 and October 2024. As the billing for the month of September 2024 has not commenced, AEML-D has requested the Commission to revise the FAC allowed for recovery in September 2024 to 20% of category energy charge and allow recovery of the total accumulated FAC for the period January 2024 to May 2024 including the recovery allowed earlier in September 2024 (Rs. 20.23 Crore) over the billing period of September 2024 and October 2024. The portion of the accumulated FAC not recovered over the period September 2024 and October 2024 is proposed to be recovered along with the FAC for period June 2024 onwards.
- 11.4 Similar situation was prevailing earlier as well, and this situation could have been envisaged well in advance by AEML-D and they could have ensured time submission of FAC proposals and response to data gaps raised by the Commission presently and in the past as well.
- 11.5 As highlighted by the Commission in the past FAC approval reports, variation in FAC amounts over different months lead to variation in Tariff for end consumers on a monthly basis thereby defeating the objective of creating FAC stabilization fund. In similar situations in the past, the Commission has taken an approach to accumulate the FAC leviable and allowing the recovery of such accumulated amounts in ensuing billing months. Similar approach was also adopted by the Commission for the period July 2023 to December 2023 wherein the recovery was allowed over the period May 2024 to September 2024 at the ceiling rate (20% of category energy charge). Accordingly, considering the accumulated FAC over the period January 2024 to May 2024, the Commission deems it appropriate to adopt a similar approach of accumulating the



FAC for January 2024 to May 2024 and allowing recovery at the ceiling limit of the FAC charge (20% of category energy charge) which would ensure that the accumulated FAC gets passed through via the FAC mechanism to the maximum extent possible in the remaining period and thus avoiding the impact of carrying cost on the accumulated FAC and the revenue gap to be carried forward to the new Multi Year Tariff control period will be minimal, thus minimising the carrying cost impact on the consumers to that extent. Accordingly, the Commission considers it appropriate to accumulate the FAC for the period of January 2024 to May 2024 and allow its recovery in the ensuing billing months at ceiling tariff. The recovery will start from September 2024 and the overall period of recovery will be decided in the Commission's approval on the FAC submission for May 2024.

- 11.6 In view of the above, per unit Z_{FAC} for the month of March 2024 will be levied on the consumers of AEML-D starting from the billing month of September 2024 along with the FAC for the period January 2024, February 20024 and April 2024 to May 2024. The details will be provided in the Commission's approval on the FAC submission for May 2024.

