



# जवाहरलाल नेहरू पोर्ट ट्रस्ट

## JAWAHARLAL NEHRU PORT TRUST

ISO 9001 : 2015  
ISO 14001:2015  
ISO 45001:2018  
ISO 27001:2013

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Ref No: JNPT/MERC/MTR/004

03 January 2023

**The Secretary,**  
**Maharashtra Electricity Regulatory Commission,**  
13th Floor, Centre No. 1, World Trade Centre,  
Cuffe Parade,  
Mumbai 400 005

Dear Sir,

**Sub:** Petition of Jawaharlal Nehru Port Trust (JNPT) for approval of Truing-up of FY 2021-22, Provisional Truing-up of FY 2022-23 and Aggregate Revenue Requirement (ARR) and Tariff for the Multi-Year Tariff period for FY 2023-24 and FY 2024-25 for its Distribution Business in accordance with Regulation 5.1 (b) of the Maharashtra Electricity Regulatory Commission (Multi Year Tariff) Regulations, 2019.

With reference to above captioned subject, we are filing herewith the Revised Petition.

The prescribed fee of Rs. 5,00,000/- has already transferred through RTGS/NEFT as per MERC (Transaction of Business and Fees and Charges) Regulations, 2022 on 28 November, 2022.

We request the Hon'ble Commission to take the same on record and place the matter for hearing.

Thanking You,

For Jawaharlal Nehru Port Trust

*A. M. Wade*  
31/1/23

Authorised Signatory

**Encl:** Copy of Petition along with Annexures

**BEFORE THE MAHARASHTRA ELECTRICITY REGULATORY  
COMMISSION, MUMBAI**

CASE NO. \_\_\_\_\_ OF 2022

**IN THE MATTER OF:**

Petition of Jawaharlal Nehru Port Trust (JNPT) for approval of Truing-up of FY 2021-22, Provisional Truing-up of FY 2022-23 and Aggregate Revenue Requirement (ARR) and Tariff for the Multi-Year Tariff period for FY 2023-24 and FY 2024-25 for its Distribution Business in accordance with Regulation 5.1 (b) of the Maharashtra Electricity Regulatory Commission (Multi Year Tariff) Regulations, 2019.

**In the matter of:**

M/s. Jawaharlal Nehru Port Trust (JNPT) ..... Petitioner

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**Before the Maharashtra Electricity Regulatory Commission  
Mumbai**

Filing No.:

Case No.:

IN THE MATTER OF      **Petition of Jawaharlal Nehru Port Trust (JNPT) for approval of Truing-up of FY 2021-22, Provisional Truing-up of FY 2022-23 and Aggregate Revenue Requirement (ARR) and Tariff for the Multi-Year Tariff period for FY 2023-24 and FY 2024-25 for its Distribution Business in accordance with Regulation 5.1 (b) of the Maharashtra Electricity Regulatory Commission (Multi Year Tariff) Regulations, 2019**

AND

IN THE MATTER OF      **Jawaharlal Nehru Port Trust (JNPT)**  
THE APPLICANT

Administration Building,  
Nhava Sheva,  
Uran, Navi Mumbai – 400 707  
(Petitioner)

PETITION UNDER SECTIONS 61, 62 and 64 OF THE ELECTRICITY ACT, 2003 AND UNDER THE MERC (TRANSACTION OF BUSINESS AND FEES AND CHARGES) REGULATIONS 2022, FOR APPROVAL BY THE HON'BLE COMMISSION OF ITS PETITION FOR TRUING-UP OF FY 2021-22, PROVISIONAL TRUING-UP OF FY 2022-23 AND AGGREGATE REVENUE REQUIREMENT (ARR) AND TARIFF FOR THE MULTI-YEAR TARIFF PERIOD FOR FY 2023-24 AND FY 2024-25 IN ACCORDANCE WITH MAHARASHTRA ELECTRICITY REGULATORY COMMISSION (MULTI YEAR TARIFF) REGULATIONS, 2019 FOR ITS DISTRIBUTION BUSINESS

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**LIST OF ABBREVIATIONS**

A&G	Administrative & General
ABR	Average Billing Rate
ACoS	Average Cost of Supply
AMR	Automatic Meter Reading
APP	Agreement of Power Purchase
ARR	Aggregate Revenue Requirement
BUA	Built-up Area
CEA	Central Electricity Authority
CPI	Consumer Price Index
CSD	Consumers' Security Deposit
CSS	Cross Subsidy Surcharge
DPR	Detailed Project Report
EA	Electricity Act
FCA	Fuel Cost Adjustment
GFA	Gross Fixed Asset
HT	High Tension
IoWC	Interest on Working Capital
IT	Information Technology
ITeS	Information Technology enabled services
JNPT	Jawaharlal Nehru Port Trust
kV	kilo Volt
kW	kilo Watt
kWh	kilo Watt hour
LT	Low Tension
MAT	Minimum Alternate Tax
MERC	Maharashtra Electricity Regulatory Commission
MIDC	Maharashtra Industrial Development Corporation
MSEDCL	Maharashtra State Electricity Distribution Company Limited
MSETCL	Maharashtra State Electricity Transmission Company Limited
MSLDC	Maharashtra State Load Despatch Centre
MU	Million Units
MW	Mega Watt



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MVA	Mega Volt Ampere
MYT	Multi Year Tariff
O&M	Operation & Maintenance
PBT	Profit Before Tax
PPA	Power Purchase Agreement
R&M	Repair & Maintenance
REC	Renewable Energy Certificate
RPO	Renewable Purchase Obligation
RTC	Round the Clock
SBI	State Bank of India
SCADA	Supervisory Control and Data Acquisition
SEZ	Special Economic Zone
STOA	Short Term Open Access
STU	State Transmission Utility
ToD	Time of Day
TSU	Transmission System User
TTSC	Total Transmission System Cost
WPI	Wholesale Price Index

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# 1 Background

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## 1.1 Jawaharlal Nehru Port Trust

1.1.1 M/s Jawaharlal Nehru Port Trust (hereinafter referred to as “JNPT” or “the Petitioner”) is a major port notified under Major Port Trusts Act, 1963. JNPT has been notified as a Developer of SEZ by the Ministry of Commerce and Industry, Government of India on 11 August, 2014 vide SEZ notification No. S. O. 2047 (E). The SEZ is being developed over an area of 277.38 Hectares situated in the villages of Savarkahar, Karal, Sonari and Jaskhar of Uran Taluka, Distt. Raigad of the Maharashtra

1.1.2 The SEZ has been planned to be developed within the port area to ensure end-to-end facilities for export-based industries including manufacturing, warehousing, assembly, packaging and finally shipment. The following sectors have been shortlisted for inclusion in the overall development plan based on their export potential and linkages to port:

- Engineering cluster
- Textile and apparel
- Electronic manufacturing
- Logistic Centre
- Multi services/ITES/Healthcare etc.

1.1.3 The Hon’ble Commission, after following the due regulatory process, issued the Order dated 14 June, 2018 in Case No 47 of 2018 and confirmed the status of the deemed Distribution Licensee to JNPT for the notified SEZ area under Section 14 of the EA, 2003. Further, specific conditions of Distribution License applicable to JNPT have been notified by the Hon’ble Commission on 13 November, 2018

## 1.2 Filing under MERC MYT Regulations, 2019

1.2.1 The Hon'ble Commission notified the MERC (Multi Year Tariff) Regulations, 2019 ("MERC MYT Regulations, 2019") for the Control Period from FY 2020-21 to FY 2024-25 on 1 August, 2019. Being a Distribution Licensee in the State of Maharashtra, JNPT is required to file the Petition for approval of Truing-up of FY 2021-22, Provisional Truing-up of FY 2022-23 and Aggregate Revenue Requirement (ARR) and Tariff for the Multi-Year Tariff period for FY 2023-24 and FY 2024-25 in accordance with the provisions of the MERC MYT Regulations, 2019.

1.2.2 Regulation 5 of the MERC MYT Regulations, 2019 specifies as under:

***"5. Petitions to be filed in the Control Period –***

*5.1 The Petitions to be filed in the Control Period under these Regulations are as under: –*

*b) Mid-Term Review Petition, which is complete in all aspects as per these Regulations, shall be filed by November 1, 2022 by Generating Companies, Transmission Licensees and SLDC, and by November 30, 2022, by Distribution Licensees, comprising:*

- i. Truing-up for FY 2019-20 to be carried out under the Maharashtra Electricity Regulatory Commission (Multi Year Tariff) Regulations, 2015;*
- ii. Truing-up for FY 2020-21 and FY 2021-22 to be carried out under the Maharashtra Electricity Regulatory Commission (Multi Year Tariff) Regulations, 2019;*
- iii. Provisional Truing-up for FY 2022-23 to be carried out under the Maharashtra Electricity Regulatory Commission (Multi Year Tariff) Regulations, 2019;*
- iv. Revised forecast of Aggregate Revenue Requirement, expected revenue from existing Tariff and charges, expected revenue gap, and proposed category-wise Tariff for the fourth and fifth year of the Control Period;"*

1.2.3 Since, the operation of JNPT as a Distribution Licensee commenced from 11 August 2021 i.e. in FY 2021-22, therefore, JNPT is filing the Petition requesting

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for approval of

- a) Truing-up for FY 2021-22 and Provisional Truing-up for FY 2022-23 and ARR for FY 2023-24 and FY 2024-25, in accordance with MERC MYT Regulations, 2019;
- b) Revenue from sale of power at existing Tariffs and projected Revenue Gap/(Surplus) for each year of the Control Period from FY 2021-22 to FY 2024-25, in accordance with MERC MYT Regulations, 2019; and
- c) Proposed category-wise Tariff for each year of the Control Period from FY 2023-24 and FY 2024-25, in accordance with MERC MYT Regulations, 2019.

The Tariff formats (in excel-soft copy) are annexed hereto and marked as **Annexure 1**.

### **1.3 Structure of the Petition**

1.3.1 The Petition consists of the following Chapters as outlined below:

**Chapter 1:** Background (Present Chapter)

**Chapter 2:** Approach for Filing the Petition

**Chapter 3:** Truing-up for FY 2021-22, Provisional Truing-up for FY 2022-23 and ARR for FY 2023-24 and FY 2024-25

**Chapter 4:** Tariff Philosophy, Tariff Design, Wheeling Charges and Cross-subsidy Surcharge for FY 2023-24 and FY 2024-25

**Chapter 5:** Proposed Tariff Schedule for the fourth Control Period for FY 2023-24 and FY 2024-25

**Chapter 6:** Prayers to the Hon'ble Commission

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## 2 Approach for filing the Petition

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### 2.1 Preamble

- 2.1.1 This is JNPT's first Petition for approval of Aggregate Revenue Requirement (ARR) and determination of tariff for its licence area. JNPT has outlined its specific issues related to distribution of power supply in the area which is relevant to be considered for true-up purpose as well as for the projections while approving ARR and determining the tariff and is specified along with its overall approach for filing this Petition in this Chapter.
- 2.1.2 JNPT submits that considering the relevant MERC MYT Regulations, 2019 and issues pertain to its operation, it is filing the True-up and ARR Petition for consideration of the Hon'ble Commission in the formats laid down for providing information relating to past, present and future performance. JNPT requests the Hon'ble Commission to consider the same while approving the ARR for JNPT and determine the tariff for FY 2023-24 and FY 2024-25.

### 2.2 Power Procurement

- 2.2.1 The Commission, vide its Order in Case No 47 of 2018 dated 14 June, 2018 declared JNPT as a deemed Distribution Licensee and directed as under:

*"The Commission notes that JNPT has no Power Purchase Agreement (PPA) in place, for fulfilling its Universal Service Obligation. In order to do so in accordance with Section 43 of the EA, 2003, JNPT must make necessary filings for PPA approval and subsequent approval of its Aggregate Revenue Requirement (ARR) and Tariff to be paid by its consumers. JNPT has sought approval of a provisional Tariff to be levied to its consumers till the Petitions for PPA and ARR are filed by it and the respective approvals are in place. JNPT has sought the provisional Tariff for the first year equivalent to MSEDCL's Tariff for respective category of consumers." (Emphasis added)*

- 2.2.2 Subsequently, the Hon'ble Commission vide its order dated 30 January, 2021 in Case No. 5 of 2021 has adopted the rate of Rs. 3.60 per unit at State periphery for 1 MW RTC power from 01 February, 2021 to 30 June, 2021 and 2 MW RTC



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power from 01 July, 2021 to 31 December, 2021 and approved PPA with Manikaran Power Limited (MPL). JNPT and MPL signed amendment to the PPA whereby the Parties agreed to extend the contract by six (6) months up to 30 June, 2022 considering the delay in commencing the power flow. Parties accordingly modified the contract period of the PPA from 01 August, 2021 to 30 June, 2022 on RTC basis having no liability on either side due to such extension. The said extension was allowed by the Hon'ble Commission by its letter dated 15 December, 2021, enclosed as Annexure 2 of this petition. JNPT submits that duration of PPA was kept as eleven (11) months only as approved by the Hon'ble Commission.

2.2.3 Further, the Hon'ble Commission in its Order dated 27 June, 2022 in Case No 90 of 2022 has also approved short term power procurement through competitive bidding route under Section 63 of the Electricity Act, 2003 or the period 1 July, 2022 to 30 June 2023.

2.2.4 It is submitted that JNPT expects slow load growth in its area of supply and has projected the sales for FY 2023-24 and FY 2024-25 as given in detail in subsequent chapter. Considering the slow load growth and till the load is stabilised and there is visibility regarding the load, JNPT has proposed short term power procurement for the remaining years of the Control Period. Thereafter, it will source medium-term power through competitive bidding, as elaborated subsequently.

## **2.3 Tariff Charged in FY 2021-22 and FY 2022-23**

2.3.1 The operation of JNPT as a Distribution Licensee commenced from 11 August 2021, i.e., FY 2021-22. The Hon'ble Commission vide its Order dated 30 January, 2021 in Case No. 5 of 2021 allowed JNPT to charge consumers in its licence area, the tariff that is applicable to the respective category of consumers in the MSEDCL area of supply, as a ceiling tariff, as an interim arrangement till the time the ARR and Tariff of JNPT is approved. Accordingly, from 11 August, 2021, JNPT charged ceiling tariff as applicable to respective categories for retail

sale of electricity in its licence area, except for FAC, which was not charged. The tariff presently charged to these categories is shown in the Table below:

**Table 2-1: Category-wise tariff charged by JNPT in FY 2021-22**

Category	Fixed/Demand Charges	Wheeling Charges (Rs/Unit)	Energy Charges (Rs/Unit)
LT II A (0 to 20KW)	Rs 415 per month	1.38	5.57
LT II B (>20 KW and <=50 KW)	Rs 415 /kVA/Month	1.38	5.57
LT II C (>50KW)	Rs 415 /kVA/Month	1.38	5.57
HT I(A) Industrial	Rs 432/kVA/Month	0.56	5.3
HT II Commercial	Rs 432/kVA/Month	0.56	5.57
LTVII (B) (ii) LT Public Service - Others	Rs 312/kVA/Month	1.38	5.04
LTV(ii) LT Industries	Rs 312/kVA/Month	1.38	5.30

**Table 2-2: Category-wise tariff charged by JNPT in FY 2022-23**

Category	Fixed/Demand Charges	Wheeling Charges (Rs/Unit)	Energy Charges (Rs/Unit)
LT II A (0 to 20KW)	Rs 415 per month	1.35	5.57
LT II B (>20 KW and <=50 KW)	Rs 415 /kVA/Month	1.35	5.57
LT II C (>50KW)	Rs 415 /kVA/Month	1.35	5.57
HT I(A) Industrial	Rs 432/kVA/Month	0.55	5.3
HT II Commercial	Rs 432/kVA/Month	0.55	5.57
LTVII (B) (ii) LT Public Service - Others	Rs 312/kVA/Month	1.35	5.04
LTV(ii) LT Industries	Rs 312/kVA/Month	1.35	5.30

## 2.4 Separation of ARR for Wires Business and Supply Business for the Control Period from FY 2021-22 to FY 2024-25

2.4.1 JNPT respectfully submits that the category-wise tariff of MSEDCL was made applicable as the ceiling tariff for JNPT's area of supply, which comprises separate Wheeling Charges for the Wires Business. The ARR is estimated separately for the Wires Business and Supply Business. The separate ARR for the Wires Business and Supply Business has been considered as the base for the projection of ARR for the Wires Business and Supply Business for the fourth Control Period. For the allocation of expenses, the Allocation Matrix specified in Regulation 71 of the MERC MYT Regulations, 2019 has been considered, wherever the actual break-up of expenses and revenue is not available.

However, since the projection of CAPEX is in pro-rata to load, as explained in subsequent section of this petition, ARR items such as Depreciation, Interest on long-term loan, and Return on Equity, have been considered separately under the Wires Business and Supply Business based on the allocation matrix as no actual break-up of Fixed Assets between Wires Business and Supply Business is available.

2.4.2 Further, JNPT has proposed separate Wheeling Charges and Retail Supply Tariff for the fourth Control Period, i.e., FY 2021-22 to FY 2024-25 in accordance with the MYT Regulations, 2019.

2.4.3 The norms considered for segregation of ARR into Wires Business and Supply Business for each component of ARR have been considered as specified in the MERC MYT Regulations, 2019, as shown below:

**Table 2-3: Allocation Matrix for segregation of ARR into Wires and Supply Business**

Particulars	Wires Business	Supply Business
Power Purchase Expenses	0%	100%
Inter-State Transmission Charges	0%	100%
Intra-State Transmission Charges	0%	100%
Operation & Maintenance Expenses	65%	35%
Interest on Working Capital	10%	90%
Interest on Consumer Security Deposits	10%	90%
Provision for Bad & Doubtful Debts	10%	90%
Income Tax	90%	10%
Contribution to Contingency Reserves	90%	10%
Non-Tariff Income	10%	90%

## 2.5 Capital Investment Plan

2.5.1 The Hon'ble Commission vide its Order dated 14 June, 2018 in Case No 47 of 2018 confirmed the status of the deemed Distribution Licensee to JNPT for the notified SEZ area subsequently notified specific conditions of Distribution License on 13 November, 2018. Accordingly, Capital Expenditure is incurred to provide backbone electrical infrastructure required for uninterrupted and reliable power supply to the consumers in the JNPT, SEZ area. JNPT has filed

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its submission before the Hon'ble Commission for post facto approval of Capital Expenditure for Distribution Business of JNPT in June 2022. The details of Capital Expenditure incurred are elaborated subsequently. The Hon'ble Commission has approved the Capex of Rs 113.94 Crore vide its letter dated 27 December 2022. Accordingly, JNPT has considered capex in proportion to the actual load for FY 2021-22 and estimated load for FY 2022-23 to FY 2024-25.

## **2.6 Approach for MYT Control Period**

- 2.6.1 The Truing-up of FY 2021-22, Provisional Truing-up of FY 2022-23 and ARR and tariff for wheeling of electricity and retail supply of electricity for the fourth Control Period for FY 2023-24 and FY 2024-25 has been projected in accordance with the MERC MYT Regulations, 2019.
- 2.6.2 Further, from FY 2022-23 onwards, JNPT proposes that the category-wise tariffs be determined based on the ARR of JNPT, rather than be linked to the ceiling tariff of MSEDCL, which was only an interim measure adopted till such time the ARR and tariffs could be determined for JNPT.
- 2.6.3 Also, JNPT has proposed to implement kVAh tariff for all categories. The details of the same is provided by JNPT in the Chapter related to Tariff Design in this Petition.
- 2.6.4 It is submitted that since there is no ARR approved for JNPT and this is the first Petition seeking Truing-up of FY 2021-22 and Provisional Truing-up of FY 2022-23, JNPT has submitted the details for the entire Control Period i.e., FY 2021-22 to FY 2024-25 in Chapter 3 for the sake of brevity based on the actual expenditure for FY 2021-22 and H1 (April 22 to September 22) of FY 2022-23 and estimates for H2 (October 22 to March 23) of FY 2022-23, FY 2023-24 and FY 2024-25 for kind consideration of the Hon'ble Commission.

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### 3 True-up for FY 2021-22, Provisional True up for FY 2022-23 and ARR for FY 2023-24 and FY 2024-25

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#### 3.1 Preamble

- 3.1.1 JNPT commenced operations as a Distribution Licensee from 11 August 2021, i.e., in FY 2021-22. Since FY 2021-22 is over, Truing-up of FY 2021-22 has based on actual values of energy sales, power purchase, revenue and expenditure, whereas for FY 2022-23, the Provisional Truing-up for FY 2022-23 has been prepared considering actual values for H1 i.e., April 22 to September 22 and estimated values of energy sales, power purchase, revenue and expenditure from 1 October 2022 to 31 March 2023, in accordance with the provisions of MERC MYT Regulations, 2019.
- 3.1.2 Regulation 5.1 (iv) of the MERC MYT Regulations, 2019 provides for projection of revised ARR for FY 2023-24 and FY 2024-25 (i.e. fourth and fifth year of the Control Period) under these Regulations. Considering this being the first petition of the Petitioner, in this Chapter, JNPT has projected the ARR for the Control Period for FY 2023-24 and FY 2024-25.
- 3.1.3 It is further submitted that 'Control Period' in respect of JNPT for the present Petition is to be considered as FY 2021-22 (August 21 to March 22) to FY 2024-25.
- 3.1.4 JNPT as a company has been maintaining single books of accounts for both all its businesses including the Distribution business. However, allocation of the expenses as been undertaken to both the business segment and the audited allocation statement for FY 2021-22 has been enclosed as Annexure 3 of this Petition.

#### 3.2 Energy Sales

- 3.2.1 As stated in previous Chapter, JNPT SEZ has been planned to be developed within the port area to ensure end-to-end facilities for export-based industries



including manufacturing, warehousing, assembly, packaging and finally shipment. JNPT commenced its operation in August 2021. Considering the pandemic situation and scenario caused due to outbreak of COVID-19, it has affected growth in manufacturing and industrial sector and thereby affecting the potential load growth of licensee area.

- 3.2.2 JNPT is presently supplying to 17 Consumers with Contract Demand of 2.15 MVA and has total demand of upto 1 MW. Further, JNPT has received additional applications for 0.85 MVA for supply of regular power in FY 2022-23. It is estimated that the total demand would be around 1 MW.
- 3.2.3 However, based on the actual sales/loading upto October 2022 and progress of work of various entities to whom land was allotted, it is expected that loading is likely to increase to 1.5 MW by 2023-24 and 2.3 MW by 2024-25 as highlighted in F1.5 of MTR formats.
- 3.2.4 Hence, sale of energy has been projected in accordance with expected loading of the consumers for respective categories. The details of month-wise and category-wise sales have been submitted in the Format F1 annexed to the present Petition.
- 3.2.5 The actual energy sales for FY 2021-22 and H1 of FY 2022-23 and projected energy sales for H2 of FY 2022-23, FY 2023-24 and FY 2024-25 are as under:

**Table 3-1: Energy Sales for the Control period (in MUs)**

Consumer Category	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
	Actual	Estimated	Projection	
<b>HT Category</b>				
Industrial HT-I (A)	0.41	2.47	3.39	5.09
Commercial HT-(II)	0.27	1.43	3.58	4.45
<b>Sub-total</b>	<b>0.69</b>	<b>3.90</b>	<b>6.96</b>	<b>9.54</b>
<b>LT Category</b>				
Commercial LT-II (A)	0.00	0.00	-	-
Commercial LT-II (B)	0.03	0.11	0.18	0.39
Commercial LT-II (C)	0.00	0.07	0.47	1.30
Industrial LT-V (II)	0.13	0.29	0.35	0.65
Public Service LT VII(B)(II)	0.06	0.06	0.08	0.16

Consumer Category	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
	Actual	Estimated	Projection	
<b>Sub-total</b>	<b>0.22</b>	<b>0.53</b>	<b>1.09</b>	<b>2.51</b>
<b>Total</b>	<b>0.91</b>	<b>4.43</b>	<b>8.05</b>	<b>12.05</b>

3.2.6 Further, as stated subsequently, JNPT has proposed kVAh tariff for all categories in accordance with the Hon'ble Commission's directions in this regard for other SEZ's in the State. Hence, the category-wise sales in Million kVAh (MkVAh) for the Control Period is also presented in the Table below:

**Table 3-2: Energy Sales for the Control period (in MVAh)**

Consumer Category	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
	Actual	Estimated	Projection	
<b>HT Category</b>				
Industrial HT-I (A)	0.43	2.62	3.58	5.39
Commercial HT-(II)	0.30	1.53	3.84	4.78
<b>Sub-total</b>	<b>0.73</b>	<b>4.15</b>	<b>7.42</b>	<b>10.17</b>
<b>LT Category</b>				
Commercial LT-II (A)	0.00	0.00	-	-
Commercial LT-II (B)	0.03	0.11	0.19	0.41
Commercial LT-II (C)	0.01	0.07	0.49	1.37
Industrial LT-V (II)	0.14	0.31	0.37	0.69
Public Service LT VII(B)(II)	0.06	0.06	0.08	0.16
<b>Sub-total</b>	<b>0.23</b>	<b>0.55</b>	<b>1.14</b>	<b>2.62</b>
<b>Total</b>	<b>0.96</b>	<b>4.70</b>	<b>8.56</b>	<b>12.79</b>

JNPT requests the Hon'ble Commission to approve the sales for the Control Period, as shown in the Table above. Any deviation from the projected sales shall be claimed at the time of Truing-up of respective year.

### 3.3 Distribution Loss

3.3.1 After considering the actual energy sales, actual energy purchase and actual Intra-State Transmission Loss for FY 2021-22 from August 2021 to March 2022, the Distribution Loss is 36.92% mainly in account of higher no-load losses.

3.3.2 JNPT submits that Distribution Loss of 36.92% is due to the fact that connectivity was granted to JNPT to supply in its licensed area at 220 kV by STU based on the estimated load of around 50 MVA. Considering the huge power requirement and criticality of electricity supply, JNPT has developed the entire network with an incoming supply at 220 kV level and internal supply at 33kV and 11 kV underground network. However, the load realised during FY 2021-22 is less than 1 MW leading sub-optimal utilisation of assets leading to higher no-load losses which are reflected in the higher loss during the year. JNPT submits that loss is only on account of Technical loss in the system.

3.3.3 JNPT expects that as the loading improves, the distribution losses may also reduce, however, it is not possible to assess the realistic levels. JNPT submits that it has optimised the no load losses by switching off the transformers (mainly 1\*50 MVA and 4\*8 MVA) considering the very low load of ~1 MW. The estimated loss for FY 2022-23 is 14.03%. Further, it will be endeavor of JNPT to reconfigure the network so that further transformers will be switched off in such a manner that there is adequate backup in case on any failure and the consumers continue to receive uninterrupted power supply. Accordingly, JNPT has proposed reduction of 0.5% each year for FY 2023-24 and FY 2024-25. In case of any variation in the distribution losses, JNPT shall approach the Hon'ble Commission for necessary relief at the time of Truing-up at the end of the Control Period.

**Table 3-3: Distribution Loss for the Control Period (%)**

Particulars	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Distribution Loss	36.92%	14.05%	13.55%	13.05%

**JNPT requests the Hon'ble Commission to approve the distribution losses for the Control Period, as shown in the Table above**

### **3.4 Energy Balance**

3.4.1 JNPT has considered the Energy Balance after considering the energy sales, Distribution Loss and energy purchase as discussed in the related sections.

Further, JNPT has considered the InSTS loss as approved by the Hon'ble Commission in the InSTS Order dated 30 March, 2020. Accordingly, energy requirement for the Control Period is as under:

**Table 3-4: Energy Balance Statement for the Control Period**

Particulars	Units	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Energy Sales	MUs	0.91	4.43	8.05	12.05
Distribution Loss	%	36.92%	14.05%	13.55%	13.05%
Energy Requirement at T<>D	MUs	1.44	5.15	9.31	13.86
Intra-State Transmission Loss	%	1.37%	1.63%	3.18%	3.18%
<b>Energy Requirement at G&lt;&gt;T</b>	<b>MUs</b>	<b>1.46</b>	<b>5.24</b>	<b>9.62</b>	<b>14.32</b>

**JNPT requests the Hon'ble Commission to approve the Energy Balance for the Control Period, as shown in the Table above.**

### **3.5 Power Purchase Cost**

3.5.1 The power purchase cost of JNPT includes the purchase from conventional sources for meeting its Base Load and Peak Load requirement, RPO for future projections, from power exchange and net purchase from Imbalance Pool made during the year.

#### **Power Purchase for Base Load and Peak Load**

3.5.2 As stated in earlier Chapter, JNPT had undertaken Short-term power procurement through competitive bidding route under Section 63 of the Electricity Act, 2003.

3.5.3 The Hon'ble Commission vide its order dated 30 January, 2021 in Case No. 5 of 2021 has adopted the rate of Rs. 3.60 per unit at State periphery for 1 MW RTC power from 01 February, 2021 to 30 June, 2021 and 2 MW RTC power from 01 July, 2021 to 31 December, 2021 and approved PPA with Manikaran Power Limited (MPL). JNPT and MPL signed amendment to the PPA whereby the Parties agreed to extend the contract by six (6) months up to 30 June, 2022 considering the delay in commencing the power flow. Parties accordingly modified the contract period of the PPA from 01 August, 2021 to 30 June, 2022

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on RTC basis having no liability on either side due to such extension. The said extension was allowed by the Hon'ble Commission by its letter dated 15 December, 2021 enclosed as Annexure 2 of this petition. JNPT submits that duration of PPA was kept as eleven (11) months only as approved by the Hon'ble Commission.

- 3.5.4 Further, the Hon'ble Commission in its Order dated 27 June, 2022 in Case No 90 of 2022 has also approved short term power procurement through competitive bidding route under Section 63 of the Electricity Act, 2003 for the period 1 July, 2022 to 30 June 2023.
- 3.5.5 As mentioned herein above, there is no clear visibility of anticipated load of JNPT going ahead. Accordingly, based on the estimated load, JNPT submits that it will purchase power on short term basis for FY 2023-24 and FY 2024-25 through competitive bidding and will approach the Hon'ble Commission for adoption of tariff. For the said period, JNPT has estimated the power purchase rate of Rs 5.40/unit based on the latest price discovered by M/s. Laxmipati Balaji Supply Chain Management Ltd. (LBSCML) for the Period February 2023 to January 2024. The said information was extracted from the DEEP Portal.
- 3.5.6 The details of month-wise and source-wise power purchase quantum and cost estimated is provided in Form F2.1 of the Formats prescribed by the Hon'ble Commission, submitted along with this Petition.

### **Renewable Purchase Obligation**

- 3.5.7 For the Control Period, JNPT has considered the RPO targets from FY 2021-22 to FY 2024-25 as proposed in the Maharashtra Electricity Regulatory Commission (Renewable Purchase Obligation, its Compliance and Implementation of Renewable Energy Certificate Framework) Regulations, 2019, as shown in the Table below:



**Table 3-5: RPO Target for the Control Period**

Year	Solar	Non-Solar	Total
2021-22	6.00%	11.50%	17.50%
2022-23	8.00%	11.50%	19.50%
2023-24	10.50%	11.50%	22.00%
2024-25	13.50%	11.50%	25.00%

3.5.8 To meet the RPO, JNPT has purchased REC's from Power Exchange for FY 2021-22 and FY 2022-23. Considering the small quantum of RE power required to meet RPO, JNPT has considered REC at Rs 1/kWh to meet the RPO for the Control Period. JNPT submits that if RE power is purchased from GDAM/GTAM market, the landed cost would be much higher after loading all the charges upto the Maharashtra Periphery resulting in higher burden on consumers. Accordingly, it would be prudent to purchase REC's till the time there is substantial load on the system .

### **Imbalance Pool**

3.5.9 JNPT has considered the actual quantum and cost of purchase from Imbalance Pool/Deviation Quantum from August 2021 to September 2022. As Deviation Quantum/Cost cannot be projected as a source of supply, the same has not been estimated for the remaining Control Period.

3.5.10 The power purchase quantum and cost for the Control Period is shown in the following Table:

**Table 3-6: Power Purchase Cost for the Control Period**

Particulars	Source	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
<b>Power Purchase Quantum (MU)</b>	Power procurement from Manikaran Power Limited	2.47	5.46	1.69	
	Short Term PPA			7.93	14.32
	Imbalance Pool	-1.12	-0.23		
	Power Exchange	0.11	0.01		
	Solar Purchase				
	Non-Solar Purchase				

Particulars	Source	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
	<b>Total</b>	<b>1.46</b>	<b>5.24</b>	<b>9.62</b>	<b>14.32</b>
<b>Power Purchase Cost (Rs. Crore)</b>	Power procurement from Manikaran Power Limited	0.77	2.69	0.85	
	Short Term PPA			4.28	7.73
	Imbalance Pool	-0.26	-0.07		
	Power Exchange	0.05	0.01		
	Solar Purchase				
	Non-Solar Purchase				
	REC	0.03	0.09	0.21	0.36
	<b>Total</b>	<b>0.60</b>	<b>2.72</b>	<b>5.34</b>	<b>8.09</b>
<b>Average Power Purchase Cost (Rs. /kWh)</b>	Power procurement from Manikaran Power Limited	3.11	4.92	5.02	
	Short Term PPA			5.40	5.40
	Imbalance Pool	2.30	2.84		
	Power Exchange	4.95	13.37		
	Solar Purchase				
	Non-Solar Purchase				
	REC cost		1.00	1.00	1.00
	<b>Total</b>	<b>4.10</b>	<b>5.19</b>	<b>5.55</b>	<b>5.65</b>

JNPT requests the Hon'ble Commission to approve the power purchase quantum and cost for the Control Period, as shown in the above Table.

### 3.6 Transmission Charges and MSLDC Charges

3.6.1 In accordance with Regulation 2(87) of the MERC MYT Regulations, 2019, JNPT being a Distribution Licensee, is a Transmission System User (TSU) for the purpose of transmission tariff determination. Further, Regulations 61 and 62 of the MERC MYT Regulations, 2019 specify the mechanism for sharing of Total Transmission System Cost (TTSC) amongst the Transmission System Users. In a similar manner, Regulation 99 of the MERC MYT Regulations, 2019 also specifies the mechanism for sharing of MSLDC charges amongst Transmission System Users.

3.6.2 At present, JNPT is paying the transmission charges and MSLDC charges as Short-Term Open Access Consumer and actual payment done is considered by JNPT for the FY 2021-22 and H1 of FY 2022-23. However, being a Distribution Licensee, JNPT is entitled to share the TTSC and MSLDC charges in accordance

with the MERC MYT Regulations, 2019.

3.6.3 Since, JNPT has proposed short term purchase for FY 2023-24 and FY 2024-25, it has considered short term transmission charges as approved by the Hon'ble Commission in the InSTS Order. Also, for projecting MSLDC charges, JNPT has considered MSLDC Charges as approved in the MSLDC's MYT Order dated 30 March, 2020.

3.6.4 JNPT requests the Hon'ble Commission to determine its share of TTSC and MSLDC charges payable during the Control Period in accordance with the provisions of MERC MYT Regulations, 2019, while determining the Transmission Charges payable by the Distribution Licensees for the Control Period. Once the Hon'ble Commission determines JNPT's share of the Transmission Charges and MSLDC Charges, the same may be considered by the Hon'ble Commission while approving the ARR for JNPT for the Control Period.

3.6.5 JNPT submits the Transmission Charges and MSLDC Charges, as shown in the following Table:

**Table 3-7: Intra-State Transmission Charges and MSLDC charges for the control period (Rs Crore)**

Particulars	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Intra-State Transmission Charges	0.13	0.21	0.38	0.56
MSLDC Charges	0.06	0.09	0.09	0.09

**JNPT requests the Hon'ble Commission to approve the Transmission Charges and MSLDC Charges for the Control Period, as shown in the Table above.**

### **3.7 Operation and Maintenance**

3.7.1 Regulations 75 and 84 of the MYT Regulations, 2019 specify the methodology for determination of O&M expenses for the Control Period from FY 2020-21 to FY 2024-25 for the Wires Business and Supply Business, respectively.

3.7.2 Regulation 75.2 of the MERC MYT Regulations, 2019 provides for base O&M expenses for FY 2019-20 to be derived on the basis of average of approved

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expenses for FY 2016-17 to FY 2018-19 escalated at average yearly inflation of WPI and CPI indices for the past five years. (Similar provisions for Retail Supply Business in Regulation 84.2 are not quoted) The relevant Regulations are as follows:

*“75.2 The Operation and Maintenance expenses shall be derived on the basis of the average of the Trued-up Operation and Maintenance expenses after adding/deducting the share of efficiency gains/losses, for the three Years ending March 31, 2019, excluding abnormal Operation and Maintenance expenses, if any, subject to prudence check by the Commission:*

*Provided that the average of such Operation and Maintenance expenses shall be considered as Operation and Maintenance expenses for the Year ended March 31, 2018, and shall be escalated at the respective escalation rate for FY 2018-19 and FY 2019-20, to arrive at the Operation and Maintenance expenses for the base year ending March 31, 2020:*

*Provided further that the escalation rate for FY 2018-19 and FY 2019-20 shall be computed by considering 30% weightage to the average yearly inflation derived based on the monthly Wholesale Price Index of the respective past five financial years as per the Office of Economic Advisor of Government of India and 70% weightage to the average yearly inflation derived based on the monthly Consumer Price Index for Industrial Workers (all-India) of the respective past five financial years as per the Labour Bureau, Government of India:”*

- 3.7.3 As there is no past data of O&M expenses available for JNPT, hence, the O&M expenses for JNPT has to be determined by projecting the individual heads of O&M expenses separately.
- 3.7.4 The above Regulations 75.2 and 84.2 are not applicable to JNPT, as the tariff is yet to be determined for JNPT, and hence, the O&M expenses have to be determined for JNPT on a case-specific basis.
- 3.7.5 It is submitted that since JNPT has started its operations from August 2021 onwards, there is no past data available for estimation of O&M expenses of JNPT, as specified in the Regulations. Hence, the O&M expenses of JNPT have to be estimated based on actuals and other considerations against Employee Expenses, A&G expenses, and R&M expenses.

### **Employee and A &G Expenses**

- 3.7.6 JNPT submits that being an initial phase of the license, whereby the load has not commensurate as per the load envisaged at the time of commencement of distribution business due to various reasons, JNPT has allocated common employees of JNPA to look after the distribution business. Hence there are no dedicated employees at present allocated to JNPT Distribution licensee business. JNPT further submits that considering the miniscule business activity of SEZ at present, JNPA (Corporate Entity equivalent) provides the support related to employee allocation, common services of Central Procurement, Group Finance and HR, Centralized IT services, Administration, Security and other common departments. JNPT submits that similar to integrated utilities, common cost is allocated to each segment of business and the similar approach was undertaken by Reliance Infrastructure Limited (RInfra) whereby the Corporate expenses of RInfra represent the expenses pertaining to common services of Central Procurement, Group Finance and HR, Centralized IT services, Administration, Security and other common departments where the resources and personnel available were rendering the services to the entire RInfra Corporate and accordingly the expenses pertaining to these departments were allocated to all the individual business segments within RInfra, such as the Mumbai energy vertical, EPC business, Wind power plants, etc., on the basis of Turnover of these individual business segments. Hence the precedence of such cases are also available. Accordingly, similar methodology has been adopted by JNPT. JNPT would like to submit that such expenses are incurred for the distribution business but by JNPA and then allocated to JNPT based on the principles as specified in the Allocation statement. Further, JNPT submits that even though the benchmark considered are of private licensee whereas JNPT is a government entity, the activities related to operation of distribution business more or less remains same. Also, as provided in the calculation in MTR petition format "Sheet - Others", the average of private and government licensee (MADC) has been considered whereby it is noticed that

even within private licensee, there is a major variation in the O&M expenses whereby in the initial year the O&M cost is on a higher side. However, JNPT in its submission has considered the average O&M expenses of 4 years of private and Government licensee and JNPT has adopted a more rationale approach for claiming O&M expenses. Accordingly, JNPT has considered the benchmark such as for the Employee Expense - 30 paise/unit and A&G expense - 10 paise/unit for FY 2021-22. The said expenses are escalated for each year as per WPI / CPI Escalation Index specified in the MERC MYT Regulations, 2019.

**Table 3-8: Employee and A&G Expenses claimed for the control period (Ps./kWh)**

Category of expenses	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Employee Expenses	0.30	0.31	0.33	0.35
A&G Expense	0.10	0.10	0.11	0.12

3.7.7 Over and above 10 ps/kwh claimed in A&G expenses, JNPT has also claimed the licensee fees and Tariff Petition filing fees separately, the details of which are outlined as below:

**Table 3-9: A&G Expenses for the control period (Rs. Crore)**

A&G Expenses	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
License Fees	0.02	0.02	0.02	0.02
Petition Filing fees		0.05		0.05
A&G Expense (linked to sales)	0.01	0.05	0.09	0.15
<b>Total</b>	<b>0.03</b>	<b>0.12</b>	<b>0.11</b>	<b>0.22</b>

### **R&M Expenses**

3.7.8 As regards R&M expenses, JNPT submits that competitive bidding process was followed for appointment of Contractor for 3 years in the licence area. Based on the outcome of the Bidding Process, M/s. Virtuous Energy Private Energy was selected for 3 years. As per the scope of work defined by JNPT, Virtuous Energy is not only required to do R&M but is also responsible for billing, operations etc of the entire licence area.

3.7.9 JNPT submits that the actual cost incurred by it for FY 2021-22 is Rs 90,98,574/- . However, since the load is yet to be fructified as envisaged and R&M of the assets needs to be done even though there is minimal load, it will have huge

impact on the consumers of JNPT. In view of the same, even though the actual expense is much higher, JNPT has only claimed R&M expense in proportion to the load to lower the impact on tariff in line with the methodology adopted for claiming Capital Expenditure as described in the subsequent section.

**Table 3-10: R&M Expenses for the Control period (Rs. Crore)**

Particulars	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Contract with Virtuous Energy P. Ltd	0.91	0.95	1.00	1.05
Proportion of Load	2%	2%	4%	6%
Allocation to R&M in pro-rata to Load	0.02	0.02	0.04	0.06

### **Total O&M expenses**

3.7.10 It is submitted that O&M expenses have been segregated between the Wires Business and Retail Supply Business based on the Allocation Matrix as specified in the MYT Regulations, 2019.

3.7.11 In view of the above, the O&M expenses claimed by JNPT for the Control Period are as shown in the following Table:

**Table 3-11: O&M Expenses for the Control Period (Rs. Crore)**

Particulars	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
<b>Distribution Wires Business</b>				
Employee Expenses	0.02	0.10	0.17	0.27
R&M Expenses	0.01	0.01	0.03	0.04
A&G Expenses	0.02	0.08	0.07	0.14
<b>Total O&amp;M Expenses</b>	<b>0.05</b>	<b>0.19</b>	<b>0.27</b>	<b>0.45</b>
<b>Retail Supply Business</b>				
Employee Expenses	0.01	0.05	0.09	0.15
R&M Expenses	0.01	0.01	0.01	0.02
A&G Expenses	0.01	0.04	0.04	0.08
<b>Total O&amp;M Expenses</b>	<b>0.03</b>	<b>0.10</b>	<b>0.15</b>	<b>0.24</b>
<b>Total Distribution Business</b>				
Employee Expenses	0.03	0.15	0.27	0.42
A&G Expenses	0.02	0.02	0.04	0.06
R&M Expenses	0.04	0.12	0.11	0.22
<b>Total O&amp;M Expenses</b>	<b>0.08</b>	<b>0.29</b>	<b>0.42</b>	<b>0.70</b>

JNPT requests the Hon'ble Commission to approve the O&M expenses for the Control Period, as shown in the above Table.

## **3.8 Capital Expenditure and Capitalisation**



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- 3.8.1 The objective of Capital Investment is to provide backbone electrical infrastructure required for uninterrupted and reliable power supply to the consumers in the JNPT, Special Economic Zone (SEZ) area as JNPT is the Deemed Distribution Licensee of the area. JNPT is a large area and was envisaged with significant electrical load comprising of mix of consumers of various categories at 33 kV, 11 kV and LV voltage levels. This would require a dedicated source of power and adequate electrical Distribution network to evacuate, distribute and supply the power to consumers. At the time of conceptualizing the SEZ project there was none of it. JNPT undertook necessary steps to develop the required infrastructure, Distribution network within JNPT licenced area to evacuate and distribute power to its consumers.
- 3.8.2 Based on peak load projection of 50 MVA, for catering the load growth and no of consumers, JNPT had appointed M/s L&T Infrastructure Engineering Limited and Vitya Consultants Pvt Ltd for the preparation of the detailed master plan and engineering design for the development of infrastructure of SEZ area at JNPT, which also included the total plan for Power Supply and Distribution Network. Considering the huge power requirement and criticality of electricity supply, an incoming supply at 220 kV level (overhead) was planned. The internal supply was planned at 33kV and 11 kV underground network. Accordingly, for development of 220 kV incomer supply and 220/33kV substation in SEZ area, JNPT had awarded contract to M/s Angelique International Ltd through tendering process. The EPC contract for internal network development of SEZ area was awarded to Joint Venture of M/S Backbone Enterprise Ltd, M/s Tarmat Ltd and M/s Al Fara's Group after following due process of tendering.
- 3.8.3 An over view of the Capital Investment plan in terms of Distribution network in JNPT is given below:
- The incoming power supply is drawn from the nearest tapping located by MSETCL through a 220 kV overhead line upto 220 kV/33 kV receiving substation. The said substation was planned with a capacity of 2x50 MVA



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serving a load of ~50 MVA with two 50 MVA transformer considering the redundancies.

- b. The power will be supplied to SEZ users through three 33/11 kV substations. The three substations are equipped with 2x8 MVA transformers to feed the estimated load of ~50 MVA and also to maintain redundancy in supply network.
- c. 2 nos. of 33 kV feeders from 220 / 33kV as incomer sources are connected to each 33/11kV substations through 33 kV 400 sq.mm UG cable (Double run proposed for standby purpose). The 33 kV Incomer Feeder for 3 substations comes out to be 12 i.e 6 active and 6 spare for standby and future load. Further, 24 nos. of 11kV feeders are planned to serve the consumers.
- d. The 11 kV secondary distribution planning includes loop feeder technology through Ring Main Units (RMU) with all breakers.

3.8.4 The Distribution network of JNPT was developed keeping in view a load requirement of 50 MW. This network is ready and put to use in August, 2021.

The Hon'ble Commission vide its letter dated 27 December, 2022 has given post-facto approval of Capital Expenditure of Rs 113.94 Crore. It is submitted that JNPT has capitalised capex to the extent of Rs 104.26 Crore. As mentioned herein above, if the said capex is claimed, it will have impact on the tariff of the consumers considering the limited load growth estimated. It is submitted that if capitalisation is to be claimed subject to minimum asset loading of 25% as per Regulation 3.12 of MERC (Approval of Capital Investment Schemes) Regulations, 2022, it would lead to situation of zero capex being allowed even if power is being supplied to consumers using the assets which even after being put to use is not allowed to be claimed in tariff. Accordingly, JNPT submits that the capitalisation is not claimed for the entire capex put to use but in proportion to the actual asset loading considering the fact that if entire capex of Rs 104.26 Crore is claimed it will burden the consumer considering the lower sales. Accordingly, JNPT requests the Hon'ble Commission to invoke Power to Relax under the MERC (Approval of Capital Investment Schemes) Regulations, 2022

and allow capex/capitalisation in proportion to actual asset loading as outlined in the following table:

**Table 3-12: Capitalisation in proportion to the load (Rs. Crore)**

Particulars	Units	Total	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Total CAPEX/ Capitalisation	Rs. Crs	104.26	2.09	-	2.09	2.09
Actual Load	MW	50	0.96	0.96	1.53	2.29
Load rounded off	MW		1.00	1.00	2.00	3.00

3.8.5 The summary of proposed Capitalisation for Wires and Retail Supply Business for the Control Period is provided below:

**Table 3-13: Capitalisation for Wire and Retail Supply Business for the Control Period (Rs. Crore)**

Fixed Assets	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
<b>For Wire Business</b>				
Plant & Machinery	1.88	0	1.88	1.88
<b>Total</b>	<b>1.88</b>	<b>0</b>	<b>1.88</b>	<b>1.88</b>
<b>For Supply Business</b>				
Plant & Machinery	0.21	0	0.21	0.21
<b>Total</b>	<b>0.21</b>	<b>0</b>	<b>0.21</b>	<b>0.21</b>
<b>Total Distribution business</b>				
Plant & Machinery	2.09	0	2.09	2.09
<b>Total</b>	<b>2.09</b>	<b>0</b>	<b>2.09</b>	<b>2.09</b>

JNPT requests the Hon'ble Commission to approve the Capitalisation for the Control Period, as discussed above.

### 3.9 Debt: Equity Ratio

3.9.1 JNPT submits that though the entire capitalisation has been undertaken through internal funds of JNPT and assets are funded 100% through equity, however, as per Regulation 27 of the MERC MYT Regulations, 2019 JNPT has considered the normative debt:equity ratio of 70:30. Accordingly, JNPT has considered the funding of the capitalisation as shown in the following Table:

**Table 3-14: Funding of Capitalisation for the Control Period (Rs. Crore)**

Particulars	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
<b>Distribution Wires Business</b>				

Particulars	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Capitalisation	1.88	-	1.88	1.88
Debt	1.31	-	1.31	1.31
Equity	0.56	-	0.56	0.56
<b>Retail Supply Business</b>				
Capitalisation	0.21	-	0.21	0.21
Debt	0.15	-	0.15	0.15
Equity	0.06	-	0.06	0.06
<b>Total</b>				
Capitalisation	2.09	-	2.09	2.09
Debt	1.46	-	1.46	1.46
Equity	0.63	-	0.63	0.63

JNPT requests the Hon'ble Commission to approve funding of Capitalisation for the Control Period, as discussed above.

### 3.10 Depreciation

3.10.1 JNPT has calculated depreciation in accordance with Regulation 28 of the MERC MYT Regulations, 2019 for the Distribution Wires and Retail Supply Business, separately. The relevant Regulations are as follows:

*"28.1 The Generating Company, Licensee, and MSLDC shall be permitted to recover depreciation on the value of fixed assets used in their respective Businesses, computed in the following manner:*

*(a) The approved original cost of the fixed assets shall be the value base for calculation of depreciation:*

*Provided that the depreciation shall be allowed on the entire capitalised amount of the new assets after reducing the approved original cost of the retired or replaced or de-capitalised assets.*

*(b) Depreciation shall be computed annually based on the straight line method at the rates specified in the Annexure I to these Regulations:*

*Provided that the Generating Company or Licensee or MSLDC shall ensure that once the individual asset is depreciated to the extent of seventy percent, remaining depreciable value as on 31st March of the year closing shall be spread over the balance Useful Life of the asset including the Extended Life, as provided in this Regulation:*

3.10.2 In view of the above Regulation, JNPT has computed depreciation based on the depreciation rates as specified in Annexure I of the MERC MYT Regulations,

2019 for the Capitalisation considered for respective years.

3.10.3 The following table shows the Depreciation computed for the Control Period based on Opening GFA and addition to GFA during the respective years:

**Table 3-15: Depreciation for the Control Period (Rs. Crore)**

Particulars	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
<b>Distribution Wires Business</b>				
Opening GFA	-	1.88	1.88	3.75
Additions during the Year	1.88	-	1.88	1.88
Closing GFA	1.88	1.88	3.75	5.63
Average GFA	0.94	1.88	2.82	4.69
<b>Net Depreciation</b>	<b>0.05</b>	<b>0.10</b>	<b>0.15</b>	<b>0.25</b>
<b>Depreciation Rate</b>	<b>5.28%</b>	<b>5.28%</b>	<b>5.28%</b>	<b>5.28%</b>
<b>Retail Supply Business</b>				
Opening GFA	-	0.21	0.21	0.42
Additions during the Year	0.21	-	0.21	0.21
Closing GFA	0.21	0.21	0.42	0.63
Average GFA	0.10	0.21	0.31	0.52
<b>Depreciation</b>	<b>0.01</b>	<b>0.01</b>	<b>0.02</b>	<b>0.03</b>
<b>Depreciation Rate</b>	<b>5.28%</b>	<b>5.28%</b>	<b>5.28%</b>	<b>5.28%</b>
<b>Combined Distribution Business</b>				
Opening GFA	-	2.09	2.09	4.17
Additions during the Year	2.09	-	2.09	2.09
Closing GFA	2.09	2.09	4.17	6.26
Average GFA	1.04	2.09	3.13	5.21
<b>Depreciation</b>	<b>0.06</b>	<b>0.11</b>	<b>0.17</b>	<b>0.28</b>
<b>Depreciation Rate</b>	<b>5.28%</b>	<b>5.28%</b>	<b>5.28%</b>	<b>5.28%</b>

JNPT requests the Hon'ble Commission to approve the Depreciation expenses for the Control Period, as shown in the Table above.

### 3.11 Interest on Long Term Loan Capital

3.11.1 JNPT has computed the Interest on Long Term Loan Capital in accordance with Regulation 30 of the MERC MYT Regulations, 2019. As stated earlier, the

operation of JNPT as Distribution Licensee started from 11 August, 2021. Hence, there is no opening balance of normative loan. JNPT has considered normative debt: equity ratio of 70:30 on the addition to GFA as discussed in the earlier section. The Depreciation has been considered as normative repayment of loan during the year.

3.11.2 JNPT submits that it does not have any actual loan and there is no other business regulated by the Hon'ble Commission. Accordingly, JNPT has considered the interest rate of the entity as a whole in line with proviso of Regulations 30.5 of MYT Regulations 2019 as outlined below:

*30.5 The rate of interest shall be the weighted average rate of interest computed on the basis of the actual long-term loan portfolio at the beginning of each year:*

*.....*

*Provided also that if the Generating Company or the Licensee or the MSLDC, as the case may be, does not have actual long-term loan, and its other Businesses regulated by the Commission also do not have actual long-term loan even in the past, then the weighted average rate of interest of the entity as a whole shall be considered:"*

3.11.3 JNPT (as an entity) has taken long term loan by issuing tax-free bonds at 6.82% and from ECB at 3.21%. The weighted average rate considered is as given below:

**Table 3-16: Weighted Average Interest rate of JNPT Loan as on FY 2021-22 (%)**

Particulars	Rs. Crs	Int. Rate
Interest Paid in FY 2021-22	94.81	
Principal Outstanding as on 31.03.2022	1,966.75	
Principal Outstanding as on 31.03.2021	2,279.20	
Average Principal Amount	2,122.97	
<b>Weighted rate of interest</b>		<b>4.47%</b>

3.11.4 Since the same rate is applicable at the beginning of the FY 2021-22, as per Regulations 30.5 of MYT Regulations 2019, JNPT has considered the similar interest rate for the balance control period.

3.11.5 The Interest on Long Term Loan capital as claimed by JNPT for the Control Period is shown in the following Table:

**Table 3-17: Interest on Loan Capital (Rs. Crore)**

Particulars	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
<b>Distribution Wires Business</b>				
Opening Balance	0.00	1.26	1.17	2.33
Addition loan during the year	1.31	0.00	1.31	1.31
Repayment during the year	0.05	0.10	0.15	0.25
Closing Balance	1.26	1.17	2.33	3.40
Average Balance of Loan	1.26	1.21	1.75	2.86
Wtd. Avg. Rate of Interest (%)	4.47%	4.47%	4.47%	4.47%
<b>Total Interest Charges</b>	<b>0.04</b>	<b>0.05</b>	<b>0.08</b>	<b>0.13</b>
<b>Retail Supply Business</b>				
Opening Balance	0.00	0.14	0.13	0.26
Addition loan during the year	0.15	0.00	0.15	0.15
Repayment during the year	0.01	0.01	0.02	0.03
Closing Balance	0.14	0.13	0.26	0.38
Average Balance of Loan	0.14	0.13	0.19	0.32
Wtd. Avg. Rate of Interest (%)	4.47%	4.47%	4.47%	4.47%
<b>Total Interest Charges</b>	<b>0.004</b>	<b>0.006</b>	<b>0.009</b>	<b>0.014</b>
<b>Combined Distribution Business</b>				
Opening Balance	0.00	1.40	1.29	2.59
Addition loan during the year	1.46	0.00	1.46	1.46
Repayment during the year	0.06	0.11	0.17	0.28
Closing Balance	1.40	1.29	2.59	3.77
Average Balance of Loan	0.70	1.35	1.94	3.18
Wtd. Avg. Rate of Interest (%)	4.47%	4.47%	4.47%	4.47%
<b>Total Interest Charges</b>	<b>0.039</b>	<b>0.060</b>	<b>0.087</b>	<b>0.142</b>

JNPT requests the Hon'ble Commission to approve the interest on long-term loans for the Control Period, as shown in the above Table.

### 3.12 Interest on Working Capital (IoWC) and Consumer Security Deposits

3.12.1 JNPT has computed the normative Interest on Working Capital as per Regulation 32 of the MERC MYT Regulations, 2019. The relevant extracts are as follows

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*“32.3 Distribution Wires Business*

- (a) The working capital requirement of the Distribution Wires Business shall cover:*
- (i) Normative Operation and maintenance expenses for one month;*
  - (ii) Maintenance spares at one per cent of the opening Gross Fixed Assets for the Year; and*
  - (iii) One and half months equivalent of the expected revenue from charges for use of Distribution Wires at the Tariff approved by the Commission for ensuing year/s;*
- minus*
- (iv) Amount held as security deposits in cash from Distribution System Users....”*

*32.4 Retail Supply of Electricity*

- (a) The working capital requirement of the Retail Supply Business shall cover:*
- (i) Normative Operation and maintenance expenses for one month;*
  - (ii) Maintenance spares at one per cent of the opening Gross Fixed Assets for the Year; and*
  - (iii) One and half months equivalent of the expected revenue from sale of electricity at the Tariff approved by the Commission for ensuing year/s, and including revenue from cross-subsidy surcharge and additional surcharge, if any;*
- minus*
- (iv) Amount held as security deposits in cash from retail supply consumers;*
  - (v) One month equivalent of cost of power purchased, including the Transmission Charges and SLDC Charges, based on the annual power procurement plan:”*

3.12.2 JNPT has projected the Consumer Security Deposit (CSD) by considering 5% increase in CSD from FY 2022-23 to FY 2024-25, on account of lack of past data. The actual increase in CSD shall be submitted at the time of Truing-up for the respective years.

3.12.3 Regulation 32.3 (b) and 34.3 (b) of MERC MYT Regulations, 2019 provides for the rate of Interest to be taken for computing Interest on Working Capital. The

relevant extract is as follows:

*“(b) Rate of interest on working capital shall be on normative basis and shall be equal to the Base Rate as on the date on which the Petition for determination of Tariff is filed, plus 150 basis points:”*

3.12.4 The one-year SBI MCLR rate as on 30 November, 2022 is 7.95%. Accordingly, the rate of interest for computation of IoWC has been considered as 9.45% considering the applicable MCLR of SBI plus 150 basis points, in accordance with the MERC MYT Regulations, 2019. The rate of interest for computation of interest on CSD has been considered equal to the prevailing Bank Rate of Reserve Bank of India (RBI), in accordance with the MYT Regulations, 2019.

3.12.5 Also, JNPT has considered the payment of Interest on CSD for FY 2021-22 in FY 2022-23 and hence the interest claimed is for FY 2021-22 and FY 2022-23 simultaneously.

3.12.6 The projected IoWC and interest on CSD for the Control Period is shown in the Tables below:

**Table 3-18: Interest on Working Capital for the Control Period (Rs. Crore)**

Particulars	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
<b>Distribution Wires Business</b>				
<i>O&amp;M expenses for a month</i>	0.007	0.016	0.023	0.038
<i>Maintenance Spares at 1% of Opening GFA</i>	0.000	0.019	0.019	0.038
<i>One and half months equivalent of the expected revenue from charges for use of Distribution Wires</i>	0.015	0.038	0.087	0.145
<i>Less: Amount held as Security Deposit from Distribution System Users</i>	0.005	0.005	0.006	0.006
<b>Total Working Capital Requirement</b>	<b>0.016</b>	<b>0.067</b>	<b>0.123</b>	<b>0.214</b>
<b>Computation of Working Capital Interest</b>				
Interest Rate (%) - SBI Base Rate +150 basis points	8.50%	9.45%	9.45%	9.45%
<b>Interest on Working Capital</b>				
<i>Normative Working Capital Interest</i>	<b>0.001</b>	<b>0.006</b>	<b>0.012</b>	<b>0.020</b>
<i>Interest on Security Deposit</i>	<b>0.000</b>	<b>0.001</b>	<b>0.000</b>	<b>0.000</b>
<b>Retail Supply Business</b>				



Particulars	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
<i>O&amp;M expenses for a month</i>	0.004	0.008	0.012	0.020
<i>Maintenance Spares at 1% of Opening GFA</i>	0.000	0.002	0.002	0.004
<i>One and half months equivalent of the expected revenue from sale of electricity</i>	0.159	0.463	1.146	1.617
<i>Less: Amount held as Security Deposit</i>	0.049	0.049	0.051	0.054
<i>Less: One month equivalent of cost of power purchase, transmission charges and MSLDC Charges</i>	0.066	0.252	0.485	0.728
<b>Total Working Capital Requirement</b>	<b>0.049</b>	<b>0.173</b>	<b>0.624</b>	<b>0.859</b>
<b>Computation of Working Capital Interest</b>				
Interest Rate (%) - SBI Base Rate +150 basis points	8.50%	9.45%	9.45%	9.45%
<b>Interest on Working Capital</b>				
<i>Normative Working Capital Interest</i>	<b>0.003</b>	<b>0.016</b>	<b>0.059</b>	<b>0.081</b>
<i>Interest on Security Deposit</i>	-	<b>0.006</b>	<b>0.003</b>	<b>0.003</b>
<b>Combined Distribution Business</b>				
<i>Normative Working Capital Interest</i>	<b>0.003</b>	<b>0.023</b>	<b>0.07</b>	<b>0.101</b>
<i>Interest on Security Deposit</i>	-	<b>0.006</b>	<b>0.004</b>	<b>0.004</b>

JNPT requests the Hon'ble Commission to approve the Interest on Working Capital and Interest on Consumers' Security Deposit for the Control Period, as shown in the Table above.

### 3.13 Return on Equity

3.13.1 JNPT has computed the Return on Equity (RoE) for the Control Period in accordance with Regulation 29 of the MERC MYT Regulations, 2019, for Distribution Wire and Retail Supply business separately. The methodology of computation as followed by JNPT is as laid out in the Regulation 29.3 of the MERC MYT Regulation, 2019, the relevant extract of which is provided below:

*“29.3 The Base Return on Equity shall be computed in the following manner:*

- (a) Return at the allowable rate as per this Regulation, applied on the amount of equity capital at the commencement of the Year; plus*
- (b) Return at the allowable rate as per this Regulation, applied on 50 per cent of the equity capital portion of the allowable capital cost, for the*

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*investments put to use in Generation Business or Transmission Business or Distribution Business or MSLDC, for such Year: ..."*

3.13.2 Further, MYT Regulations, 2019 provides for pre-tax RoE to be computed for the Control Period. In line with Regulation 34 of MYT Regulations, 2019, the Licensee has to claim pre-tax RoE for FY 2020-21 considering the effective tax rate on the basis of actual tax paid in respect of the said Financial Year.

*"34.1 The Income Tax for the Generating Company or Licensee or MSLDC for the regulated business shall be allowed on Return on Equity, including Additional Return on Equity through the Tariff charged to the Beneficiary/s, subject to the conditions stipulated in Regulations 34.2 to 34.6:....."*

*34.2 The rate of Return on Equity, including additional rate of Return on Equity as allowed by the Commission under Regulation 29 of these Regulations shall be grossed up with the effective tax rate of respective financial year.*

*34.3 The base rate of return on equity shall be rounded off to three decimal places and shall be computed as per the formula given below:  
Rate of pre-tax return on equity = Base rate of Return on Equity / (1-t),  
Where "t" is the effective tax rate*

*34.4 The effective tax rate shall be considered on the basis of actual tax paid in respect of financial year in line with the provisions of the relevant Finance Acts by the concerned Generating Company or Licensee or MSLDC, as the case may be:*

*Provided that, in case of the Generating Company or Licensee or MSLDC has engaged in any other regulated or unregulated Business or Other Business, the actual tax paid on income from any other regulated or unregulated Business or Other Business shall be excluded for the calculation of effective tax rate:*

*Provided further that effective tax rate shall be estimated for future year based on actual tax paid as per latest available Audited accounts, subject to prudence check."*

3.13.3 Since tax is paid by JNPT as a whole entity which also includes unregulated business, it has considered the tax rate as per actual tax paid by JNPT. Thus, the effective tax rate considered for the calculation of RoE in accordance with

Regulations 34.3 of MYT Regulations 2019 is 34.94%. The detailed tax calculation has provided in Form F12 submitted along with this Petition. Thus, the pre-tax return on equity is equal to 21.52% for Wires Business and 23.83% for Retail Business for FY 2021-22.

3.13.4 Thus, JNPT has computed the RoE at 21.52 % and 23.83 % for the Wires Business and Supply Business, respectively, on the opening equity for the respective year and 50% for the asset addition during the year, by considering the normative equity as 30% of the capitalisation, as discussed in the earlier paragraphs for the entire Control Period. The RoE has been submitted in Forms F8 submitted along with this Petition.

3.13.5 It is submitted that JNPT, for the year FY 2021-22 has achieved Wires Availability of 100% and therefore entitled for additional RoE of 1.5%. Further, assessed bills issued by JNPT are ZERO% and Collection Efficiency is 99.73% for FY 2021-22. JNPT submits that it commenced its operations in August 2021 and FY 2021-22 is first year of commencement of operations. Accordingly, the collection of billing done during the month March 22 is in the month of April 22. JNPT has considered the said collection in FY 2021-22 for computing Collection Efficiency. During the normal course of operations, there would be overlap of collection in the month of April which would not have any impact. Considering the 1<sup>st</sup> year of operation, JNPT requests the Hon'ble Commission to consider the Collection Efficiency 99.73% for FY 2021-22. Accordingly, JNPT is entitled to additional RoE of 2%. JNPT has claimed the additional RoE as mentioned above for FY 2021-22.

3.13.6 Accordingly, total Pre-Tax RoE claimed for the control period is outlined in the following table:

**Table 3-19: Pre-tax RoE for the control period (%)**

Particulars	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
<b>Distribution Wire Business</b>				
Base RoE	14.00%	14.00%	14.00%	14.00%
Performance RoE	1.50%			
Total RoE	15.50%	14.00%	14.00%	14.00%
Effective tax Rate	34.94%	34.94%	34.94%	34.94%

Particulars	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Pre-Tax RoE	23.83%	21.52%	21.52%	21.52%
<b>Retail Supply Business</b>				
Base RoE	15.50%	15.50%	15.50%	15.50%
Performance RoE	2.00%			
Total RoE	17.50%	15.50%	15.50%	15.50%
Effective tax Rate	34.94%	34.94%	34.94%	34.94%
Pre-Tax RoE	26.90%	23.83%	23.83%	23.83%

3.13.7 Based on the above Pre-Tax RoE, the Return on Equity (RoE) claimed by JNPT for the Control Period for the Wires Business and Retail Supply Business is shown in the following Tables:

**Table 3-20: Return on Equity for the Control Period (Rs. Crore)**

Particulars	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
<b>Distribution Wires Business</b>				
Op. Balance of Equity	0.000	0.563	0.563	1.126
Addition during the year	0.563	0.000	0.563	0.563
Cl. Balance of Equity	0.563	0.563	1.126	1.689
<b>Return on Equity Computation</b>				
Op. Balance	0.000	0.121	0.121	0.242
Addition during the year	0.067	0.000	0.061	0.061
<b>Return on Equity on Wire Business</b>	<b>0.067</b>	<b>0.121</b>	<b>0.182</b>	<b>0.303</b>
<b>Retail Supply Business</b>				
Op. Balance of Equity	0.000	0.063	0.063	0.125
Addition during the year	0.063	0.000	0.063	0.063
Cl. Balance of Equity	0.063	0.063	0.125	0.188
<b>Return on Equity Computation</b>				
Op. Balance	0.000	0.015	0.015	0.030
Addition during the year	0.008	0.000	0.007	0.007
<b>Return on Equity on Supply Business</b>	<b>0.008</b>	<b>0.015</b>	<b>0.022</b>	<b>0.037</b>
<b>Combined Distribution Business</b>				
<b>Return on Equity on Combined Distribution Business</b>	<b>0.075</b>	<b>0.136</b>	<b>0.204</b>	<b>0.340</b>

JNPT requests the Hon'ble Commission to approve the RoE for the Control Period as shown in the above Table.

### 3.14 Provisioning for Bad Debts

3.14.1 JNPT has not considered provisioning for bad debts as it has not envisaged any outstanding receivables during the Control Period

### 3.15 Contribution to Contingency Reserves

3.15.1 As per Regulation 35.1 of MERC MYT Regulations, 2019, JNPT is required to make contribution to contingency reserve, a sum not less than 0.25 per cent of the original cost of fixed assets annually. Such contribution is also required to be invested in securities permitted under the Indian Trusts Act, 1882 within a period of six months of the close of the year.

3.15.2 Since the opening GFA has been zero for both Wires and Retail Supply Business, Contribution to Contingency Reserve has not been claimed for FY 2021-22. However, JNPT has considered the Contribution to Contingency Reserves in accordance with Regulation 35 of the MERC MYT Regulations, 2019 at 0.5% of original cost of fixed assets for the Control Period as shown in the Table below:

**Table 3-21: Contribution to Contingency Reserves for Control Period (Rs. Crore)**

Particulars	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
<b>Distribution Wires Business</b>				
Opening Balance of GFA	0.000	1.877	1.877	3.753
Contribution to Contingency Reserves for Wires Business	0.000	0.005	0.005	0.009
<b>Retail Supply Business</b>				
Opening Balance of GFA	0.000	0.209	0.209	0.417
Contribution to Contingency Reserves for Supply Business	0.000	0.001	0.001	0.001

3.15.3 The Contribution to Contingency Reserves has been submitted in Forms F11 submitted along with this Petition.

**JNPT therefore requests the Hon'ble Commission to approve Contribution to Contingency Reserves for the Control Period, as shown in the above Table.**

### 3.16 Non-Tariff Income

3.16.1 JNPT has considered Non-Tariff Income considering the investments in Contingency Reserve proposed for the Control Period. For the projection purpose, it is presumed that the amount will be invested in GoI, GILT securities and interest rate assumed is 7.50% equivalent to RBI – 10-Year G-Sec Par Yield as on 22 October 2022.

3.16.2 Further, it has also considered income from consumer charges levied in accordance with Schedule of Charges approved by the Hon'ble Commission. The Non-Tariff Income claimed by JNPT for the Control Period is shown in the following Table:

**Table 3-22: Non-Tariff Income for the Control Period (Rs. Crore)**

Particulars	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
<b>Non-Tariff Income</b>				
<i>Distribution Wires Business</i>	0.0000	0.0000	0.0002	0.0007
<i>Retail Supply Business</i>	0.0032	0.0032	0.0032	0.0032
<b>Total Non-Tariff Income</b>	<b>0.003</b>	<b>0.003</b>	<b>0.003</b>	<b>0.004</b>

JNPT requests the Hon'ble Commission to approve Non-Tariff Income for the Control Period, as shown in the above Table.

### 3.17 Revenue from Sale of Electricity

3.17.1 JNPT submits that the Hon'ble Commission vide its Order dated 30 January, 2021 in Case No. 5 of 2021, had approved the ceiling tariff for JNPT as the Tariff that is applicable for the respective category of consumers in the MSEDCL area of supply, as modified from time to time and has approved the corresponding Tariff Schedule for Industrial Tariff for Industrial consumers and Commercial Tariff for the facilities established within the licence area of JNPT.

3.17.2 The category-wise break-up of revenue from Fixed Charges, Demand Charges, Energy Charges, etc., is provided in Form F13 of the Formats, which are submitted along with the Petition.

3.17.3 The summary of estimated category-wise revenue from sale of electricity for FY 2021-22 and FY 2022-23 submitted by JNPT in the present Petition, is shown

in the following Table:

**Table 3-23: Revenue of JNPT for the Control Period (Rs. Crore)**

Consumer Category	FY 2021-22	FY 2022-23
	Actual	Estimated
	Revenue - Rs. Crore	
<b>HT Category</b>		
Industrial HT-I (A)	0.42	2.17
Commercial HT-(II)	0.25	1.38
<b>Sub-total</b>	<b>0.68</b>	<b>3.56</b>
<b>LT Category</b>		
Commercial LT-II (A)	0.00	0.00
Commercial LT-II (B)	0.03	0.10
Commercial LT-II (C)	0.01	0.08
Industrial LT-V (II)	0.11	0.22
Public Service LT VII(B)(II)	0.04	0.05
<b>Sub-total</b>	<b>0.19</b>	<b>0.45</b>
<b>Total</b>	<b>0.87</b>	<b>4.01</b>

JNPT requests the Hon'ble Commission to approve Revenue from Sale of Electricity for FY 2021-22 and FY 2022-23, as shown in the above Table.

### 3.18 Aggregate Revenue Requirement

3.18.1 The summary of the ARR claimed by JNPT for the Distribution Wires Business for the Control Period, is as shown in the Table below:

**Table 3-24: ARR of the Distribution Wire Business for the Control Period (Rs. Crore)**

Particulars	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
O&M Expenses	0.055	0.186	0.273	0.453
Depreciation	0.050	0.099	0.149	0.248
Interest on Loan Capital	0.035	0.054	0.078	0.128
Interest on Working Capital	0.001	0.006	0.012	0.020
Interest on CSD	0.000	0.001	0.000	0.000
Provision for bad and doubtful debts	0.000	0.000	0.000	0.000
Contribution to Contingency Reserves	0.000	0.005	0.005	0.009
Income Tax	0.000	0.000	0.000	0.000
<b>Total Revenue Expenditure</b>	<b>0.141</b>	<b>0.351</b>	<b>0.516</b>	<b>0.859</b>
Add: Return on Equity Capital	0.067	0.121	0.182	0.303
<b>Aggregate Revenue Requirement</b>	<b>0.208</b>	<b>0.472</b>	<b>0.698</b>	<b>1.161</b>
Less: Non-Tariff Income	0.000	0.000	0.000	0.001
<b>Total Aggregate Revenue Requirement</b>	<b>0.208</b>	<b>0.472</b>	<b>0.698</b>	<b>1.161</b>

3.18.2 The Summary of ARR claimed by JNPT for the Distribution Wires Business for the Control Period, is as shown in the Table below:

**Table 3-25: ARR of the Retail Supply Business for the Control Period (Rs. Crore)**

Particulars	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Power Purchase Expenses	0.598	2.717	5.341	8.088
O&M Expenses	0.030	0.100	0.147	0.244
Depreciation	0.006	0.011	0.017	0.028
Interest on Loan Capital	0.004	0.006	0.009	0.014
Interest on Working Capital	0.003	0.016	0.059	0.081
Interest on CSD	0.000	0.006	0.003	0.003
Provision for bad and doubtful debts	0.000	0.000	0.000	0.000
Contribution to Contingency Reserves	0.000	0.001	0.001	0.001
Intra-State Transmission Charges	0.130	0.215	0.385	0.558
MSLDC Fees & Charges	0.059	0.093	0.094	0.095
Prompt Payment Discount	0.000	0.000	0.000	0.000
Income Tax	0.000	0.000	0.000	0.000
<b>Total Revenue Expenditure</b>	<b>0.828</b>	<b>3.165</b>	<b>6.054</b>	<b>9.113</b>
Add: Return on Equity Capital	0.008	0.015	0.022	0.037
<b>Aggregate Revenue Requirement</b>	<b>0.837</b>	<b>3.179</b>	<b>6.077</b>	<b>9.150</b>
Less: Non-Tariff Income	0.003	0.003	0.003	0.003
<b>Aggregate Revenue Requirement from Retail Supply</b>	<b>0.834</b>	<b>3.176</b>	<b>6.073</b>	<b>9.147</b>

JNPT requests the Hon'ble Commission to approve the ARR for Distribution Wires Business and Retail Supply Business for the Control Period, as shown in the above Tables.

### 3.19 Revenue Gap/(Surplus) for FY 2021-22 and FY 2022-23

3.19.1 JNPT has computed the combined Revenue Gap/(Surplus) for the Wires Business and Retail Supply Business for FY 2021-22 and FY 2022-23, as shown in the following Table:

**Table 3-26: Revenue Gap/(Surplus) for FY 2021-22 and FY 2022-23 (Rs. Crore)**

Particulars	FY 2021-22	FY 2022-23
	Actual	Estimated
ARR for Distribution Wires Business	0.21	0.47
ARR for Retail Supply Business	0.83	3.18
<b>Combined ARR for Wires and Retail Supply Business</b>	<b>1.04</b>	<b>3.65</b>
<b>Revenue from existing tariff</b>	<b>0.87</b>	<b>4.01</b>
<b>Revenue Gap/(Surplus) of Licensed Business</b>	<b>0.17</b>	<b>(0.36)</b>



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JNPT requests the Hon'ble Commission to approve the Revenue Gap/(Surplus) after Truing-up of FY 2021-22 and Provisional Truing-up for FY 2022-23, as shown in the above Table. The said Revenue Gap is now proposed to be passed through to the consumers, over the MYT Control Period, as elaborated in the Chapter on Tariff Philosophy.

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## 4 Tariff Philosophy and Tariff Design for the MYT Control Period – FY 2023-24 and FY 2024-25

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### 4.1 Approach to Tariff Design

4.1.1 JNPT in this Petition has proposed revision in the Retail Supply Tariff and Wheeling Charges for the Control Period for FY 2023-24 and FY 2024-25, keeping in view the principles of tariff determination set out in Sections 61 and 62 of the EA, 2003, the Tariff Policy, relevant provisions of the MYT Regulations, 2019, and the Commission's previous Tariff Orders.

### 4.2 Revenue Gap/(Surplus) at existing tariff

4.2.1 JNPT has computed the Revenue Gap/(Surplus) at the existing tariff based on the projected ARR of the Distribution Wires and Retail Supply Business, and the revenue based on the projected category-wise sales and tariff presently being charged to the consumers, i.e., Tariff for FY 2023-24 and FY 2024-25 respectively as approved for MSEDCL in tariff order dated 30 March 2019, which is also the ceiling tariff of MSEDCL supply area approved by the Hon'ble Commission.

#### **Treatment of Revenue Gap/(Surplus) along with Carrying/(Holding) Cost on account of Truing-up of FY 2021-22**

4.2.2 JNPT submits that as computed in Table 3-26, the Revenue Gap of Rs. 0.17 Crore is claimed against the True-up for FY 2021-22. based on the ARR as computed for FY 2021-22. JNPT has computed carrying/(holding cost) on Revenue Gap/(Surplus) of FY 2021-22 to be passed on in the tariff of FY 2023-24.

4.2.3 Also, as stated in Regulations 33 of MYT Regulations, 2019, the Carrying / Holding Cost is calculated on simple interest basis, at the weighted average Base Rate prevailing during the concerned Year, plus 150 basis points.

4.2.4 The following Table shows the computation of carrying/(holding) cost on the

Revenue Gap/(Surplus) of FY 2021-22 which is claimed till FY 2023-24 i.e., the year in which is proposed to be passed on to consumers.

**Table 4-1: Carrying/(Holding) Cost Computation (Rs. Crore)**

Particulars	FY 2021-22	FY 2022-23	FY 2023-24
Opening Gap/(Surplus)	-	0.17	0.17
Gap/(Surplus) during the Year	0.17		
Gap/(Surplus) passed on to consumers			0.17
Closing Gap/(Surplus)	0.17	0.17	-
Average Gap/(Surplus)	0.08	0.17	0.08
Interest Rate for Carrying/(Holding) Cost	8.50%	9.45%	9.45%
<b>Carrying/(Holding) Cost for the Year</b>	<b>0.01</b>	<b>0.02</b>	<b>0.01</b>

#### **Overall Revenue Gap/(Surplus) projected for the Control Period for FY 2023-24 and FY 2024-25**

4.2.5 The overall projected Revenue Gap/(Surplus) based on projected ARR and Revenue from existing tariff for each year of the Control Period along with the claim of past gaps with the carrying / holding cost is summarised in the Table below:

**Table 4-2: Projected Revenue Gap/(Surplus) at existing Tariff for the Control Period (Rs. Crore)**

Particulars	FY 2023-24	FY 2024-25
ARR for Distribution Wires Business	0.70	1.16
ARR for Retail Supply Business	6.07	9.15
<b>ARR for Combined Wire Business &amp; Retail Supply Business</b>	<b>6.77</b>	<b>10.31</b>
Add: True-up Gap/(Surplus) of FY 2021-22	0.17	
Add: Provisional True-up Gap/(Surplus) of FY 2022-23	(0.36)	
Add: Carrying/(Holding) Cost for Revenue Gap/(Surplus) of FY22	0.03	
<b>Net Revenue Requirement</b>	<b>6.61</b>	<b>10.31</b>
Less: Revenue at Existing Tariff	9.16	12.93
<b>Revenue Gap/(Surplus) of Licensed Business</b>	<b>(2.56)</b>	<b>(2.63)</b>

4.2.6 As seen from the above Table, gap of Rs 0.17 Crore along with Carrying Cost for FY 2021-22 and surplus of Rs. 0.36 Crore computed after Provisional Truing-up of FY 2022-23, is proposed to be adjusted in the ARR of FY 2023-24.

4.2.7 The details of projected revenue from existing tariff for each year of Control Period is provided in Forms F13.1 to F13.3 of the Petition Formats, submitted

along with this Petition.

4.2.8 From the above Table, it is observed that there is a Revenue Surplus for FY 2023-24 and FY 2024-25, as the revenue at the existing tariff is higher than the ARR of the Wires Business and Supply Business, on account of levy of MSEDCL's ceiling tariff. Hence, the tariff is required to be reduced in order to match the ARR of the Wires Business and Supply Business.

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

**Table 4-3: Projected Revenue Requirement and ACoS for FY 2023-24 and FY 2024-25 (Rs. Crore)**

Sr.	Particulars	FY 2023-24	FY 2024-25
1.	<b>Net Revenue Requirement</b>	<b>6.61</b>	<b>10.31</b>
2.	Energy Sales (MUs)	8.05	12.05
3.	<b>Average Cost of Supply (ACoS) (Rs./kWh)</b>	<b>8.21</b>	<b>8.55</b>
4.	<b>Average Annual Tariff Increase/(Decrease) (%)</b>	<b>(0.30)%</b>	<b>4.16%</b>

4.2.10 Accordingly, JNPT has determined the revenue required to be recovered from the revised tariff for Wires Business and Supply Business. JNPT for the purpose of this Petition has matched the Average Cost of Supply (ACoS) for each with the Average Billing Rate (ABR) of that year and accordingly has computed the annual Tariff increase/decrease for the respective year.

4.2.11 The Wheeling Charges have been proposed, such that the entire Wires ARR is recovered from the Wheeling Charges. The Retail Supply Tariff, i.e., Fixed/Demand Charges and Energy Charges, have been proposed accordingly, to recover the balance part of the composite ARR projected for FY2023-24 and FY 2024-25.

### 4.3 Determination of Wheeling Charges

4.3.1 JNPT submits that contribution of HT sales to the total projected sales for FY 2023-24 and FY 2024-25 is around 80%. Considering the configuration of existing distribution network and since the primary distribution voltage is 11

kV, it would not be appropriate to segregate such lower quantum of loss into HT level and LT level.

- 4.3.2 Hence, common Wheeling charges have been proposed for HT and LT category based on the ARR for Wires Business and projected energy sales, as under:

**Table 4-4: Proposed Wheeling Charges for FY 2023-24 and FY 2024-25**

Sr.	Particulars	FY 2023-24	FY 2024-25
1.	Net ARR for Distribution Wires Business (Rs. Crore)	0.70	1.16
2.	Energy Sales (MU in kVAh)	8.56	12.79
3.	Wheeling Charges (Rs./kVAh)	<b>0.81</b>	<b>0.91</b>

**JNPT requests the Hon'ble Commission to approve the Wheeling Charges for the Control Period, as proposed in the above Table.**

#### **4.4 Philosophy for Retail Supply Tariff**

JNPT proposes the following tariff philosophy for the determination of Retail Supply Tariff for the Control Period:

##### **4.4. A. Fixed/Demand Charges**

- 4.4.1 JNPT has proposed to reduce Fixed/Demand Charges for each of the consumer categories, as compared to the Fixed/Demand Charges as approved by the Hon'ble Commission in Case No. 322 of 2019 vide Order dated 30 March 2020.
- 4.4.2 Accordingly, JNPT has proposed following demand/fixed charges for FY 2023-24 to FY 2024-25 for the existing categories in the SEZ area:

**Table 4-5: Proposed Demand/Fixed Charges for FY 2023-24 to FY 2024-25**

Category of consumers	Units	FY 2023-24	FY 2024-25
Industrial HT-I (A)	Rs/kVA/mth	330	370
Commercial HT-(II)	Rs/kVA/mth	330	370
Commercial LT-II (A)	Rs/conn/mth	320	370
Commercial LT-II (B)	Rs/kVA/mth	320	370
Commercial LT-II (C)	Rs/kVA/mth	320	370
Industrial LT-V (II)	Rs/kVA/mth	290	340
Public Service LT VII(B)(II)	Rs/kVA/mth	290	340

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#### **4.4. B. Reduction of Cross-subsidy**

- 4.4.3 JNPT submits that the Cross Subsidy has been equated to around zero for all categories for FY 2023-24 and FY 2024-25, i.e., the Average Billing rate for all categories is almost equal to the ACoS.
- 4.4.4 At present, the applicable ceiling tariff for the area of supply of JNPT is the tariff of MSEDCL for industrial and commercial categories. The tariff of MSEDCL for Industrial and Commercial Categories has been determined after taking into account the requirement of cross-subsidy in MSEDCL's licence area and the consumption of these categories vis-a-vis the consumption of other subsidised categories. Further, the cross-subsidies between consumer categories in MSEDCL's area of supply is a historical legacy, and the Hon'ble Commission is attempting to reduce the cross-subsidies through appropriate tariff design every year. If the same tariff design is continued for JNPT's area of supply, then the cross-subsidy structure will continue between commercial and industrial Consumers.
- 4.4.5 The Electricity Act, 2003 also mandates gradual reduction of cross-subsidies in a progressive manner in the area of supply of the Licensee. In order to achieve this objective of the Electricity Act, 2003, and since the tariff for JNPT is being determined for the first time, JNPT desires that from the beginning itself, there shall be minimum cross-subsidy between consumer categories in its area of supply. Hence, JNPT has proposed category-wise tariffs in such a manner that the Average Billing Rate (ABR) for almost every consumer category shall be equal to the ACoS. This will reduce/eliminate the cross-subsidy in the area of supply of JNPT and consumers will be benefited.
- 4.4.6 Hence, for the Control Period, JNPT has proposed the category-wise tariffs based on the philosophy of  $ACoS = ABR$  for each consumer category.
- 4.4.7 The cross-subsidy trajectory proposed over the Control Period, with respect to the cross-subsidy based on existing tariffs, is shown in the Table below:

**Table 4-6: Projected Cross Subsidy for the MYT Control Period**

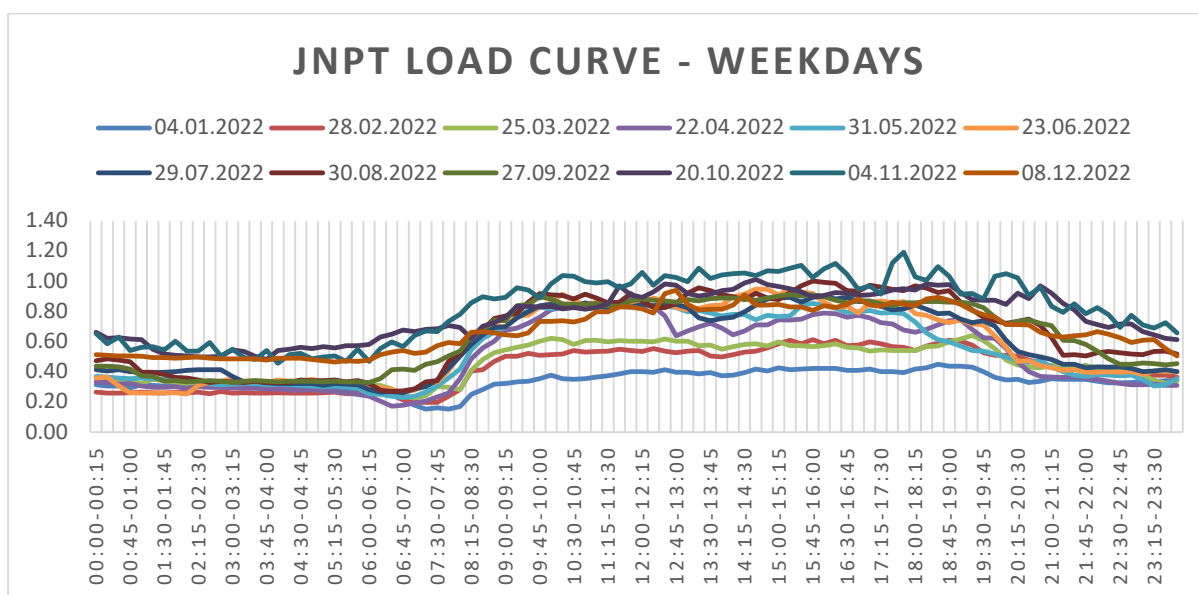
Category	FY 2023-24	FY 2024-25
	Projected	Projected
<b>HT Category</b>		
Industrial HT-I (A)	100%	100%
Commercial HT-(II)	100%	100%
<b>LT Category</b>		
Commercial LT-II (A)	0%	0%
Commercial LT-II (B)	100%	100%
Commercial LT-II (C)	102%	101%
Industrial LT-V (II)	100%	100%
Public Service LT VII(B)(II)	100%	100%

4.4.8 The details of category-wise cross-subsidy are also provided in Form F15, submitted along with the Petition.

**JNPT requests the Hon'ble Commission to approve the cross-subsidy reduction as proposed by JNPT in the Table above.**

#### **4.4. C. Time of Day (ToD) Tariff**

4.4.9 As per the present tariff schedule, the following Time of Day (ToD) Tariff is applicable for HT Industrial, HT-Commercial, LT Industrial and LT Commercial category having load above 20 kW. It is submitted that load curve of JNPT as shown below clearly shows that there is less load during 22:00 Hrs to 6:00 Hrs and same needs to be incentivised to flatten the curve. Similarly, to reduce the peak demand by shifting the load to other time blocks, higher TOD rates are being proposed in the tariff. Further, the power purchased by JNPT is RTC power considering the availability of power and rate, it is necessary to flatten the curve to optimise the cost. Thus, considering the present load curve of JNPT, it has proposed to continue with the existing TOD rates which meets the objective of the having load curve without much variation. Further, the present load of JNPT is very less and as it increases in coming years and stabilises, JNPT will analyse and propose necessary changes in TOD slots in next MYT Petition.



4.4.10 The following Table shows the existing/proposed structure of ToD tariffs applicable for respective categories in Rs/kVAh.

**Table 4-7: Existing and Proposed Time of Day Tariff**

Time Slot	Existing and Proposed ToD Tariff (Rs./kVAh)
2200 Hrs - 0600 Hrs	(1.50)
0600 Hrs - 0900 Hrs & 1200 Hrs - 1800 Hrs	0.00
0900 Hrs - 1200 Hrs	0.80
1800 Hrs - 2200 Hrs	1.10

#### **4.4. D. Power Factor Incentive/Penalty**

4.4.11 As JNPT has proposed kVAh tariff for all categories, there is no relevance of continuing with the Power Factor Incentive/Penalty mechanism. Hence, JNPT proposes to discontinue the existing Power Factor Incentive/Penalty mechanism for the MYT Control Period for FY 2023-24 and FY 2024-25.

#### **4.4. E. Load Factor Incentives/Penalties**

4.4.12 The Hon'ble Commission in the Tariff Orders of other Distribution Licensees has approved Load Factor Incentive (up to 15 % of energy charge) for incentivising bulk consumers in the State to maintain steady demand on the



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system.

- 4.4.13 Consumers having Load Factor above 75% and upto 85% will be entitled to an incentive in the form of a rebate of 0.75% on the Energy Charges for every percentage point increase in Load Factor from 75% to 85%. Consumers having a Load Factor above 85% will be entitled to a rebate of 1% on the Energy Charges for every percentage point increase in Load Factor from 85%. The total rebate will be subject to a ceiling of 15% of the Energy Charges applicable to the consumer.
- 4.4.14 This incentive will be applicable only to consumers in the HT tariff categories.
- 4.4.15 The Load Factor incentive will be available only if the consumer has no arrears with the Distribution Licensee, and payment is made within seven days from the date of the electricity bill. However, it will be available to consumers in whose case payment of arrears in instalments has been allowed by the Distribution Licensee, and such payment is being made as scheduled.
- 4.4.16 The Load factor will be computed in line with the formula as provided by the Hon'ble Commission in MSEDCL's Tariff Order and as amended on time to time basis.
- 4.4.17 In case the consumer exceeds its Contract Demand (including during the non-peak hours, i.e., 22:00 hrs to 06:00 hrs.) in any particular month, the Load Factor Incentive will not be payable to the consumer in that month.

#### **4.4. F. Penalty for exceeding Contract Demand**

- 4.4.18 In case a consumer (availing Demand-based Tariff) exceeds his Contract Demand, he will be billed at the applicable Demand Charge rate for the Demand actually recorded, and also be charged an additional amount at the rate of 150 % of the applicable Demand Charge (only for the Demand in excess of the Contract Demand).
- 4.4.19 In case a LT consumer with a sanction demand/ contract demand less than 20

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kW records actual contract demand above 20 kW, he will be billed at the tariff applicable for the respective load slab approved by the Hon'ble Commission, in which recorded demand falls for that billing cycle only and also be charged an additional amount at the rate of 150% of the applicable charge for the Demand in excess of the Contract Demand.

4.4.20 Further JNPT can enhance the Contract Demand of the consumer when the consumers exceeds the Contract Demand on more than three occasions during a calendar year, irrespective whether the Consumer submits an application for the same or otherwise. However, before such revision of Contract Demand, JNPT will give 15 days' notice such consumer. Also, the Consumer is liable to pay necessary charges as may be stipulated in the approved Schedule of Charges for the revised Contract Demand.

4.4.21 Under these circumstances, the consumer shall not be liable for any other action under Section 126 of the EA, 2003, since the penal additional Demand Charge provides for the penalty that the consumer is liable to pay for exceeding his Contract Demand. In case a consumer exceeds his Contract Demand on more than three occasions in a calendar year, the action to be taken would be governed by the provisions of the Supply Code Regulations.

4.4.22 Based on the above submission, JNPT has not proposed any changes in the existing incentives/penalties and it will continue to prevails as per the miscellaneous and general charges as approved by Hon'ble Commission in its Order dated 30 March 2020 in Case No. 322 of 2019.

#### **4.4. G. Discount for Digital Payment**

4.4.23 MERC MYT Regulations, 2019 provides for discount to be given to LT category of consumers for payment of electricity bills through various modes of digital payment. The relevant extract is as follows:

*"36.3 A discount on the monthly bill (excluding taxes and duties) shall be provided to Low Tension category consumers for payment of electricity*

*bills through various modes of digital payment such as credit cards, debit cards, UPI, BHIM, internet banking, mobile banking, mobile wallets, etc.:*

*Provided that the rate of such discount shall be stipulated by the Commission in the relevant Tariff Order"*

4.4.24 JNPT therefore proposes the existing discount of 0.25% of the monthly bill (excluding taxes and duties), subject to a cap of Rs. 500/- per month per bill, for all LT category consumers.

## 4.5 Tariff Proposal for FY 2023-24 and FY 2024-25

4.5.1 Based on the tariff philosophy as discussed in the earlier paragraphs, JNPT proposes the following revised Tariff for its area of supply for the Control Period for FY 2023-24 and FY 2024-25:

**Table 4-8: Proposed Tariff Schedule for FY 2023-24**

Sr. No.	Consumer Category	Fixed/ Demand Charge per month	Wheeling Charges (Rs./kVAh)	Energy Charges (Rs/kVAh)
<b>HIGH TENSION CATEGORIES</b>				
1	<b>HT I: HT- Industry</b>	Rs. 330 per kVA	0.81	5.08
2	<b>HT II: HT Commercial</b>	Rs. 330 per kVA	0.81	5.27
<b>TOD Tariffs (in addition to above Base Tariffs)- compulsory for HT I and HT II categories</b>				
2200 Hrs – 0600 Hrs				(1.50)
0600 Hrs – 0900 Hrs & 1200 Hrs- 1800 Hrs				0.00
0900 Hrs – 1200 Hrs				0.80
1800 Hrs – 2200 Hrs				1.10
<b>LOW TENSION CATEGORIES</b>				
3	<b>LT II: LT Commercial</b>			
(A) 0-20 kW		Rs. 320	0.81	6.53
(B) Above >20 and <=50 kW		Rs. 320 per kVA	0.81	6.53
(C) Above 50 kW		Rs. 320 per kVA	0.81	6.53
4	<b>LT V(ii): LT Industry</b>	Rs. 290 per kVA	0.81	6.24
5	<b>LTVII (B) (ii): Public Service</b>	Rs. 290 per kVA	0.81	6.02
<b>TOD Tariffs (in addition to above Base Tariffs)- compulsory for LT II(B), LT II(C), LT V (ii) and LT VII (B) categories</b>				
2200 Hrs – 0600 Hrs				(1.50)
0600 Hrs – 0900 Hrs & 1200 Hrs- 1800 Hrs				0.00
0900 Hrs – 1200 Hrs				0.80
1800 Hrs – 2200 Hrs				1.10

Table 4-9: Proposed Tariff Schedule for FY 2024-25

Sr. No.	Consumer Category	Fixed/ Demand Charge per month	Wheeling Charges (Rs./kVAh)	Energy Charges (Rs/kVAh)
<b>HIGH TENSION CATEGORIES</b>				
1	<b>HT I: HT- Industry</b>	Rs. 370 per kVA	0.91	5.32
2	<b>HT II: HT Commercial</b>	Rs. 370 per kVA	0.91	5.71
<i>TOD Tariffs (in addition to above Base Tariffs)- compulsory for HT I and HT II categories</i>				
2200 Hrs – 0600 Hrs				(1.50)
0600 Hrs – 0900 Hrs & 1200 Hrs- 1800 Hrs				0.00
0900 Hrs – 1200 Hrs				0.80
1800 Hrs – 2200 Hrs				1.10
<b>LOW TENSION CATEGORIES</b>				
3	<b>LT II: LT Commercial</b>			
(A) 0-20 kW		Rs. 370	0.91	6.93
(B) Above >20 and ≤50 kW		Rs. 370 per kVA	0.91	6.93
(C) Above 50 kW		Rs. 370 per kVA	0.91	6.93
4	<b>LT V(ii): LT Industry</b>	Rs. 340 per kVA	0.91	6.45
5	<b>LTVII (B) (ii): Public Service</b>	Rs. 340 per kVA	0.91	6.32
<i>TOD Tariffs (in addition to above Base Tariffs)- compulsory for LT II(B), LT II(C), LT V (ii) and LT VII (B) categories</i>				
2200 Hrs – 0600 Hrs				(1.50)
0600 Hrs – 0900 Hrs & 1200 Hrs- 1800 Hrs				0.00
0900 Hrs – 1200 Hrs				0.80
1800 Hrs – 2200 Hrs				1.10

JNPT requests the Hon'ble Commission to approve the category-wise tariffs for FY 2023-24 and FY 2024-25 as proposed above.

4.5.2 The revenue to be recovered from revised tariffs have been provided in Forms F14.1 and F14.2 submitted along with the Petition Formats.

#### 4.6 Determination of Cross-Subsidy Surcharge

4.6.1 Section 2(47) of the Electricity Act, 2003 defines 'Open Access', while Section 42 of the Act inter-alia mandates the Distribution Licensee to provide Open Access to eligible consumers, subject to payment of Cross-Subsidy Surcharge, Additional Surcharge and other applicable charges.

4.6.2 Section 86(1) of the Act inter-alia mandates the Hon'ble Commission to

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determine Cross-Subsidy Surcharge (CSS), Additional Surcharge and other applicable charges payable by the consumers opting for Open Access.

- 4.6.3 CSS shall be calculated based on the Formula stipulated in the revised Tariff Policy notified by Ministry of Power on January 28, 2016, as reproduced below:

*“SERCs may calculate the cost of supply of electricity by the distribution licensee to consumers of the applicable class as aggregate of (a) per unit weighted average cost of power purchase including meeting the Renewable Purchase Obligation; (b) transmission and distribution losses applicable to the relevant voltage level and commercial losses allowed by the SERC; (c) transmission, distribution and wheeling charges up to the relevant voltage level; and (d) per unit cost of carrying regulatory assets, if applicable.*

*Surcharge formula:*

$$S = T - [C/(1-L/100) + D + R]$$

*Where,*

*S is the surcharge*

*T is the tariff payable by the relevant category of consumers, including reflecting the Renewable Purchase Obligation*

*C is the per unit weighted average cost of power purchase by the Licensee, including meeting the Renewable Purchase Obligation*

*D is the aggregate of transmission, distribution and wheeling charge applicable to the relevant voltage level*

*L is the aggregate of transmission, distribution and commercial losses, expressed as a percentage applicable to the relevant voltage level*

*R is the per unit cost of carrying regulatory assets.*

*Above formula may not work for all distribution licensees, particularly for those having power deficit, the State Regulatory Commissions, while keeping the overall objectives of the Electricity Act in view, may review and vary the same taking into consideration the different circumstances prevailing in the area of distribution licensee*

*Provided that the surcharge shall not exceed 20% of the tariff applicable to the category of consumers seeking open access.”*

4.6.4 JNPT has computed the category-wise CSS for HT I and HT II Category, i.e., the category eligible for Open Access in accordance with the above formula, for each year of the Control Period, as shown in the following Table:

**Table 4-10: Proposed Cross-Subsidy Surcharge for HT-I category**

Year	T (ABR)	C	WL	TL	L	C/(1-L%)	D	CSS	CSS
	Rs./kWh	Rs./kWh	%	%	%	Rs./kWh	Rs./kWh	Rs./kWh	Rs/kVAh
FY 2023-24	8.21	5.55	13.55%	3.18%	16.73%	6.67	0.98	0.56	0.53
FY 2024-25	8.56	5.65	13.05%	3.18%	16.23%	6.74	1.04	0.77	0.73

**Table 4-11: Proposed Cross-Subsidy Surcharge for HT-II category**

Year	T (ABR)	C	WL	TL	L	C/(1-L%)	D	CSS	CSS
	Rs./kWh	Rs./kWh	%	%	%	Rs./kWh	Rs./kWh	Rs./kWh	Rs/kVAh
FY 2023-24	8.21	5.55	13.55%	3.18%	16.73%	6.67	0.98	0.56	0.52
FY 2024-25	8.55	5.65	13.05%	3.18%	16.23%	6.74	1.04	0.77	0.72

JNPT requests the Hon'ble Commission to approve the category-wise Cross Subsidy Surcharge for FY 2023-24 and FY 2024-25 as proposed in the Table above.

## 4.7 Schedule of Charges

4.7.1 JNPT has been levying schedule of charges for the consumers which is approved by the Hon'ble Commission for MSEDCL in its Order dated 30 March, 2020 in Case No. 322 of 2019. JNPT submits that being an SEZ it has developed the network in a manner that any new Consumer is able to get the connection in plug and play manner and no incremental network is required to be laid by Distribution Licensee to release supply to the Consumer. Accordingly, JNPT is not proposing any Schedule of Charges for release of supply to Consumer except for the following charges as given below:

- A. Administrative Charges for Dishonouring the Cheque – Rs 750/- or Bank Charges whichever is higher.
- B. Processing Fees for Open Access – Rs 2500/- per application
- C. Operating Charges for Open Access – Rs 2500/- per month.
- D. Reconnection Charges pursuant to disconnection due to default in payment
  - a. LT Connection – Rs 500/-
  - b. HT Connection – Rs 3000/-

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The aforesaid charges are being proposed in line with the charges approved for other SEZ's in the State and or MSEDCL. Accordingly, JNPT requests the Hon'ble Commission to approve the same Schedule of Charges for the Control Period for FY 2023-24 and FY 2024-25.

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## 5 Proposed Tariff Schedule for the Control Period

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### 5.1 HT-I - HT Industry

#### Applicability

This tariff category is applicable for electricity for Industrial use at High Voltage for purposes of manufacturing and processing, including electricity used within such premises for general lighting, heating/cooling, etc.

It is also applicable for use of electricity/power supply for Administrative Offices/Canteen, Recreation Hall/Sports Club or facilities/Health Club or facilities/Gymnasium/Swimming Pool exclusively meant for employees of the industry; water pumps, fire-fighting pumps and equipment, street and common area lighting; Research and Development units, Telecom Tower etc.

Provided that all such facilities are situated within the same industrial premises and supplied power from the same point of supply.

This tariff category shall be applicable for use of electricity/power supply by an Information Technology (IT) or IT-enabled Services (ITeS) Unit as defined in the applicable IT/ITes Policy of Government of Maharashtra.

It is also applicable for use of electricity / power supply for common facilities in the IT Park/SEZ (such as lobbies, central air conditioning, lifts, escalators, Effluent Treatment Plant/Sewage Treatment Plant, wash rooms etc.) which are used by the Units, excluding support services areas, after the registration is granted to the IT Park by the Directorate of Industries and Development Commissioner of the SEZ for an IT SEZ, as per the IT and ITeS Policy of the Government of Maharashtra as applicable from time to time.

This Tariff category is also applicable for Electric Vehicle Charging Station.

Provided that in case the consumer uses the electricity supply for charging his own electric vehicle at his premises, the tariff applicable shall be as per the category of such premises.

Electricity consumption for other facilities at Charging Station such as restaurant, rest rooms, convenience stores, etc., shall be charged at tariff applicable to Commercial Category



**Tariff w.e.f April 1, 2023**

Consumption Slab	Demand Charge (Rs./kVA/month)	Wheeling Charge (Rs./kVAh)	Energy Charge (Rs./kVAh)
All Units	330	0.81	5.08

**Tariff w.e.f April 1, 2024**

Consumption Slab	Demand Charge (Rs./kVA/month)	Wheeling Charge (Rs./kVAh)	Energy Charge (Rs./kVAh)
All Units	370	0.91	5.32

**ToD Tariffs for FY 2023-24 and FY 2024-25**

Sr. No.	Particulars	TOD Tariffs (Rs./kVAh) (in addition to the Base Tariff)
1	22:00 Hrs - 06:00 Hrs	(1.50)
2	0600 Hrs - 0900 Hrs & 1200 Hrs - 1800 Hrs	0.00
3	0900 Hrs - 1200 Hrs	0.80
4	1800 Hrs - 2200 Hrs	1.10

## 5.2 HT-II – HT Commercial

### Applicability

This tariff category is applicable for electricity used at High Voltage in non-residential, non-industrial and/or commercial premises for commercial consumption meant for operating various appliances used for purposes such as lighting, heating, cooling, cooking, and washing/cleaning, entertainment/leisure and water pumping in, but not limited to, the following premises:

- (a) Non-Residential, Commercial and Business premises, including Shopping Malls and Showrooms;
- (b) Combined lighting and power services for facilities relating to Entertainment, including film studios, cinemas and theatres (including multiplexes), Hospitality, Leisure, Meeting/Town Halls, and places of Recreation and Public Entertainment;
- (c) Offices, including Commercial Establishments;
- (d) Marriage Halls, Hotels / Restaurants, Ice-cream parlours, Coffee Shops, Guest Houses, Internet / Cyber Cafes, Telephone Booths and Fax / Photocopy shops;
- (e) Automobile and all other types of repairs, servicing and maintenance centres (unless specifically covered under another tariff category); Retail Gas Filling Stations, Petrol Pumps & Service Stations, including Garages; -
- (f) Tailoring Shops, Computer Training Institutes, Typing Institutes, Photo Laboratories, Laundries, Beauty Parlours and Saloons;
- (g) Banks and ATM centres, Telephone Exchanges, TV Stations, Micro Wave Stations, Radio Stations, Telecommunications Tower;
- (h) Sewage Treatment Plant/ Effluent Treatment Plant and common facilities like Water Pumping / Lifts / Fire-Fighting Pumps and other equipment / Street and other common area Lighting for Commercial Complexes, and not covered under the HT I – Industry category;
- (i) Sports Clubs/facilities, Health Clubs/facilities, Gymnasiums, Swimming Pools not covered under any other category;
- (j) Construction of all types of structures/ infrastructure for any purposes;
- (k) Stand-alone Research and Development units not covered under any other category;

**Tariff w.e.f April 1, 2023**

Consumption Slab	Demand Charge (Rs./kVA/month)	Wheeling Charge (Rs./kVAh)	Energy Charge (Rs./kVAh)
All Units	330	0.81	5.27

**Tariff w.e.f April 1, 2024**

Consumption Slab	Demand Charge (Rs./kVA/month)	Wheeling Charge (Rs./kVAh)	Energy Charge (Rs./kVAh)
All Units	370	0.91	5.71

**ToD Tariffs for FY 2023-24 and FY 2024-25**

Sr. No.	Particulars	TOD Tariffs (Rs./kVAh) (in addition to the Base Tariff)
1	22:00 Hrs - 06:00 Hrs	(1.50)
2	0600 Hrs - 0900 Hrs & 1200 Hrs - 1800 Hrs	0.00
3	0900 Hrs - 1200 Hrs	0.80
4	1800 Hrs - 2200 Hrs	1.10

**Note:**

A consumer in the HT II tariff category requiring single-point supply for the purpose of downstream consumption by separately identifiable entities shall have to operate as a Franchisee authorised as such by the Distribution Licensee; or such downstream entities shall be required to take separate individual connections and be charged under the tariff category applicable to them.

### 5.3 LT II – LT Commercial

- a. LT II (A) – LT Commercial up to 20 kW Load
- b. LT II (B) – LT Commercial above 20 kW and less than or equal to 50 kW Load
- c. LT II (C) – LT Commercial above 50 kW Load

#### Applicability

This tariff category is applicable for electricity used at Low/Medium Voltage in non-residential, non-industrial and/or commercial premises for commercial consumption meant for operating various appliances used for purposes such as lighting, heating, cooling, cooking, and washing/cleaning, entertainment/leisure and water pumping in, but not limited to, the following premises.

- (a) Non-Residential, Commercial and Business premises, including Shopping Malls and Showrooms;
- (b) Combined lighting and power supply for facilities relating to Entertainment, including film studios, cinemas and theatres (including multiplexes), Hospitality, Leisure, Meeting/Town Halls, and places of Recreation and Public Entertainment;
- (c) Offices, including Commercial Establishments;
- (d) Marriage Halls, Hotels / Restaurants, Ice-cream parlours, Coffee Shops, Guest Houses, Internet / Cyber Cafes, Telephone Booths, and Fax / Photocopy shops;
- (e) Automobile and all other types of repairs, servicing and maintenance centres (unless specifically covered under another tariff category); Retail Gas Filling Stations, Petrol Pumps and Service Stations, including Garages;
- (f) Tailoring Shops, Computer Training Institutes, Typing Institutes, Photo Laboratories, Laundries, Beauty Parlours and Saloons;
- (g) Banks and ATM centres, Telephone Exchanges, TV Stations, Microwave Stations, Radio Stations, Telecommunications Towers;
- (h) Sports Clubs/facilities, Health Clubs/facilities, Gymnasiums, Swimming Pools not covered under any other category;
- (i) Construction of all types of structures/ infrastructure for any purposes;
- (j) Sewage Treatment Plant/ Effluent Treatment Plant and common facilities like Water Pumping / Lifts / Fire-Fighting Pumps and other equipment /

Street and other common area Lighting for Commercial Complexes and not covered under the LT Industry category;

(k) Stand-alone Research and Development Units not covered under any other category;

(l) Temporary supply for any of the activity not covered under any other head.

#### **Tariff w.e.f April 1, 2023**

<b>Consumption Slab</b>	<b>Fixed/ Demand Charge</b>	<b>Wheeling Charge (Rs/kVAh)</b>	<b>Energy Charge (Rs./kVAh)</b>
LT II (A)	Rs. 320 per month	0.81	6.53
LT II (B)	Rs. 320 per kVA per month	0.81	6.53
LT II (C)	Rs. 320 per kVA per month	0.81	6.53

#### **Tariff w.e.f April 1, 2024**

<b>Consumption Slab</b>	<b>Fixed/ Demand Charge</b>	<b>Wheeling Charge (Rs/kVAh)</b>	<b>Energy Charge (Rs./kVAh)</b>
LT II (A)	Rs. 370 per month	0.91	6.93
LT II (B)	Rs. 370 per kVA per month	0.91	6.93
LT II (C)	Rs. 370 per kVA per month	0.91	6.93

#### **ToD Tariffs for FY 2023 -24 and FY 2024-25**

<b>Sr. No.</b>	<b>Particulars</b>	<b>TOD Tariffs (Rs. /kVAh) (in addition to the Base Tariff)</b>
1	22:00 Hrs - 06:00 Hrs	(1.50)
2	0600 Hrs - 0900 Hrs & 1200 Hrs - 1800 Hrs	0.00
3	0900 Hrs - 1200 Hrs	0.80
4	1800 Hrs - 2200 Hrs	1.10

#### **Note:**

The ToD Tariff is compulsorily applicable to LT - II (B) and LT II (C)

## 5.4 LT V - LT Industrial

### Applicability

This tariff category is applicable for electricity for Industrial use, at Low/Medium Voltage, for purposes of manufacturing and processing, including electricity used within such premises for general lighting, heating/cooling, etc.

It is also applicable for use of electricity / power supply for Administrative Offices / Canteens, Recreation Hall / Sports Club or facilities / Health Club or facilities/ Gymnasium / Swimming Pool exclusively meant for employees of the industry; Research and Development units, etc. –

Provided that all such facilities are situated within the same industrial premises and supplied power from the same point of supply;

This tariff category shall also be applicable for use of electricity / power supply by an Information Technology (IT) or IT-enabled Services (ITeS) Unit as defined in the applicable IT and ITeS Policy of Government of Maharashtra. Where such Unit does not hold the relevant permanent registration Certificate, the tariff shall be as per the LT II category, and the LT III tariff shall apply to it after receipt of such permanent registration Certificate and till it is valid.

It is also applicable for use of electricity / power supply for common facilities in the IT Park/SEZ (such as lobbies, central air conditioning, lifts, escalators, Effluent Treatment Plant/Sewage Treatment Plant, wash rooms etc.) which are used by the Units, excluding support services areas, after the registration is granted to the IT Park by the Directorate of Industries and Development Commissioner of the SEZ for an IT SEZ, as per the IT and ITeS Policy of the Government of Maharashtra as applicable from time to time. (In case the Government of Maharashtra revisits the present dispensation given under the IT and ITeS Policy, 2015, such use will be billed under the Commercial tariff category unless otherwise stipulated in the revised Policy.)

This Tariff category is also applicable for Electric Vehicle Charging Station.

Provided that in case the consumer uses the electricity supply for charging his own electric vehicle at his premises, the tariff applicable shall be as per the category of such premises.

Electricity consumption for other facilities at Charging Station such as restaurant, rest rooms, convenience stores, etc., shall be charged at tariff applicable to Commercial Category

#### **Tariff w.e.f April 1, 2023**

<b>Consumption Slab</b>	<b>Fixed/ Demand Charge</b>	<b>Wheeling Charge (Rs/kVAh)</b>	<b>Energy Charge (Rs./kVAh)</b>
LT V	Rs. 290 per kVA per month	0.81	6.24

#### **Tariff w.e.f April 1, 2024**

<b>Consumption Slab</b>	<b>Fixed/ Demand Charge</b>	<b>Wheeling Charge (Rs/kVAh)</b>	<b>Energy Charge (Rs./kVAh)</b>
LT V	Rs. 340 per kVA per month	0.91	6.45

#### **ToD Tariffs for FY 2023-24 and FY 2024-25**

<b>Sr. No.</b>	<b>Particulars</b>	<b>TOD Tariffs (Rs. / kVAh) (in addition to the Base Tariff)</b>
1	22:00 Hrs - 06:00 Hrs	(1.50)
2	0600 Hrs - 0900 Hrs & 1200 Hrs - 1800 Hrs	0.00
3	0900 Hrs - 1200 Hrs	0.80
4	1800 Hrs - 2200 Hrs	1.10

## 5.5 LT VII (B) – LT -Public Services – Others

### Applicability

This tariff category is applicable for electricity supply at Low/Medium Voltage for:

- (a) Educational Institutions, such as Schools and Colleges; Health Care facilities, such as Hospitals, Dispensaries, Clinics, Primary Health Care Centres, Diagnostic Centres, Blood Banks, Laboratories; Libraries and public reading rooms - other than those of the State or Central Government or Local Self-Government bodies such as Municipalities, Zilla Parishads, Panchayat Samitis, Gram Panchayats, etc.
- (b) Sports Clubs and facilities / Health Clubs and facilities / Gymnasium / Swimming Pools attached to such Educational Institutions /Health Care facilities, provided that they are situated in the same premises and are meant primarily for their students / faculty/ employees/ patients;
- (c) all offices of Government and Municipal/ Local Authorities/ Local Self-Government bodies, such as Municipalities, Zilla Parishads, Panchayat Samitis, Gram Panchayats; Police Stations and Police Chowkies; Post Offices; Armed Forces/Defence and Para-Military establishments;
- (d) Service-oriented Spiritual Organisations;
- (e) State or Municipal/Local Authority Transport establishments, including their Workshops
- (f) Fire Service Stations; Jails, Prisons; Courts;
- (g) Airports;
- (h) Ports and Jetties;
- (i) Railway/Metro/Monorail Stations, including Shops, Workshops, Yards, etc, if the supply is at Low/ Medium Voltage.
- (j) Waste processing units
- (k) All Students Hostels affiliated to Educational Institutions
- (l) All other Students' or Working Men/Women's Hostels;
- (m) Other types of Homes/Hostels, such as (i) Homes/Hostels for Destitutes, Disabled Persons (physically or mentally handicapped persons, etc.) and mentally ill persons (ii) Remand Homes (iii) Dharamshalas, (iv) Rescue



Homes, (v) Orphanages - subject to verification and confirmation by the Distribution Licensee's concerned Zonal Chief Engineer or equivalent;

**Tariff w.e.f April 1, 2023**

Consumption Slab	Fixed/ Demand Charge	Wheeling Charge (Rs/kVAh)	Energy Charge (Rs./kVAh)
LT VII (B)	Rs. 290 per kVA per month	0.81	6.02

**Tariff w.e.f April 1, 2024**

Consumption Slab	Fixed/ Demand Charge	Wheeling Charge (Rs/kVAh)	Energy Charge (Rs./kVAh)
LT VII (B)	Rs. 340 per kVA per month	0.91	6.32

**ToD Tariffs for FY 2023-24 and FY 2024-25**

Sr. No.	Particulars	TOD Tariffs (Rs. / kVAh) (in addition to the Base Tariff)
1	22:00 Hrs - 06:00 Hrs	(1.50)
2	0600 Hrs - 0900 Hrs & 1200 Hrs - 1800 Hrs	0.00
3	0900 Hrs - 1200 Hrs	0.80
4	1800 Hrs - 2200 Hrs	1.10

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## 5.6 MISCELLANEOUS AND GENERAL CHARGES

### **A. Fuel Adjustment Cost (FAC) Component of Z factor Charge**

- 5.6.1 The FAC Component of Z factor charge will be determined based on the formula specified in the MERC MYT Regulations, 2019 and approved by the Commission and directions as may be given by the Commission from time to time and will be applicable to all consumer categories for their entire consumption.
- 5.6.2 In case of any variation in the fuel prices and power purchase prices, the Distribution Licensee shall pass on the adjustments through the FAC component of the Z-factor Charge accordingly.
- 5.6.3 The details of applicable  $Z_{FAC}$  for each month shall be available on the JNPT website [www.jnport.gov.in](http://www.jnport.gov.in).

### **B. Electricity Duty and Tax on Sale of Electricity**

- 5.6.4 The Electricity Duty and Tax on Sale of Electricity, as applicable, will be levied in addition to the tariffs approved by the Commission as per the Government of Maharashtra guidelines from time to time. However, the rate and the reference number of the Government Resolution/Order vide which the Electricity Duty and Tax on Sale of Electricity are made effective shall be stated in the bill. A copy of such Resolution / Order shall be made available on the website [www.jnport.gov.in](http://www.jnport.gov.in)

### **C. Prompt Payment Discount**

- 5.6.5 A prompt payment discount of 1% on the monthly bill (excluding Taxes and Duties) shall be available to the consumers if the bills are paid within a period of 7 working days from the date of issue of the bill.

### **D. Delayed Payment Charges**

- 5.6.6 Delayed Payment Charges shall be applicable as per Regulation 37.2 of MERC MYT Regulations, 2019 as under:

*In case the payment of bills of retail Tariff by the consumers is delayed beyond a period of 15 days for High Tension consumers and 21 days for Low Tension consumers from the date of billing, Delayed Payment Charge on the billed amount, including the taxes, cess, duties, etc., shall be levied at the rate of 1.25% on the billed amount for the first month of delay.*

**E. Rate of Interest on Arrears**

- 5.6.7 The rate of interest chargeable on arrears will be as given below for payment of arrears-

Sr. No.	Delay in Payment (months)	Interest Rate per annum (%)
1	Payment after 60 days and up to 90 days from date of billing	12
2	Payment beyond 90 days	15

**F. Digital Payment Discount**

- 5.6.8 Digital payment discount of 0.25% of the monthly bill (excluding Taxes and Duties), subject to a cap of Rs. 500/- shall be provided to LT category consumers for payment of electricity bills through various modes of digital payment such as credit cards, debit cards, UPI, BHIM, internet banking, mobile banking, mobile wallets, etc.

**G. Load Factor Incentive**

- 5.6.9 Consumers having Load Factor over 75% up to 85% will be entitled to a rebate of 0.75% on the Energy Charges for every percentage point increase in Load Factor from 75% to 85%. Consumers having a Load Factor over 85 % will be entitled to rebate of 1% on the Energy Charges for every percentage point increase in Load Factor from 85%. The total rebate under this head will be subject to a ceiling of 15% of the Energy Charges for that consumer. This

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incentive is applicable only to consumers in the tariff categories of HT Industry, HT Commercial.

5.6.10 Further, the Load Factor incentive will be available only if the consumer has no arrears with JNPT, and payment is made within seven days from the date of the bill. However, this incentive will be applicable to consumers where payment of arrears in instalments has been granted by JNPT, and the same is being made as scheduled. JNPT will take a commercial decision on the issue of how to determine the time frame for which the payments should have been made as scheduled, in order to be eligible for the Load Factor Incentive.

5.6.11 The Load Factor has been defined below:

$$\text{Load Factor} = \frac{\text{Consumption during the month in MU}}{\text{Maximum Consumption Possible during the month in MU}}$$

*Maximum consumption possible = Contract Demand (kVA) x Actual Power Factor x (total no. of hours during the month, less actual interruption hours recorded in the meter for billing period)*

5.6.12 Additionally, the Load Factor Incentive shall not be applicable for the month if the consumer exceeds its Contract Demand in that month. Consumers exceeding Contract demand during the off-peak hours (2200 hrs to 0600 hrs) would also not be eligible for Load factor Incentive for that month..

#### **H. Penalty for exceeding Contract Demand**

5.6.13 In case a consumer (availing Demand-based Tariff) exceeds his Contract Demand, he will be billed at the applicable Demand Charge rate for the Demand actually recorded, and also be charged an additional amount at the rate of 150% of the applicable Demand Charge (only for the Demand in excess of the Contract Demand).

5.6.14 Under these circumstances, the consumer shall not be liable for any other action under Section 126 of the EA, 2003, since the penal additional Demand Charge

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provides for the penalty that the consumer is liable to pay for exceeding his Contract Demand. In case a consumer exceeds his Contract Demand on more than three occasions in a calendar year, the action to be taken would be governed by the provisions of the Supply Code Regulations.

**I. Consumer Security Deposit**

5.6.15 Subject to the provisions of Section 47(5) of the Electricity Act, 2003, the Distribution Licensee shall require any person to whom supply of electricity has been sanctioned to deposit an amount as security in accordance with the provisions of Section 47(1) (a).

5.6.16 The amount of the Security Deposit shall be as stipulated in Electricity Supply Code and Standards of Performance of Distribution Licensees including Power Quality) Regulations, 2021 as amended from time to time.

**J. Grid Support Charges**

5.6.17 JNPT submits that MERC (Grid Interactive Rooftop Renewable Energy Generating Systems) Regulations, 2019 have an enabling provision for the Distribution Licensee to propose Grid Support Charges for the consumer opting for grid connected solar roof top arrangement through the Net Metering arrangement. However, in order to encourage green energy generation in its limited licence area, JNPT has not proposed levy of Grid Support Charges on the consumer.

**K. Definitions:**

**Maximum Demand**

Maximum Demand in kilo-Watts or kilo-Volt Amperes, in relation to any period shall, unless otherwise provided in any general or specific Order of the Commission, mean twice the highest number of kilo-watt-hours or kilo-Volt Ampere hours supplied and taken during any consecutive thirty-minute blocks in that period.

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**Contract Demand**

Contract Demand means the demand in kilo-Watt (kW) or kilo-Volt Amperes (kVA), mutually agreed between the Distribution Licensee and the consumer as entered into in the agreement or agreed through other written communication. (For conversion of kW into kVA, the Power Factor of 0.80 shall be applied.).

**Sanctioned Load**

Sanctioned Load means load in Kilowatt (kW) mutually agreed between JNPT and the consumer.

**Billing Demand (for LT categories):**

Monthly Billing Demand will be the higher of the following:

- (a) 65% of the actual Maximum Demand recorded in the month during 0600 hours to 2200 hours;
- (b) 40% of the Contract Demand.

*Note:*

- (a) In case of change in Contract Demand, the period specified in Clause (a) above will be reckoned from the month following the month in which the change of Contract Demand takes place.

**Billing Demand (for HT categories):**

Monthly Billing Demand will be the higher of the following:

- a) Actual Maximum Demand recorded in the month during 0600 hours to 2200 hours;
- b) 75% of the highest billing demand recorded during preceding eleven months subject to limit of Contract Demand.
- c) 70% of the Contract Demand\*.

\* FY 2023-24: 70% and FY 2024-25: 75%

*Note: In case of change in Contract Demand, the period specified in Clause (a) above will be reckoned from the month following the month in which the change of Contract Demand takes place.*



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## 6 Prayers

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JNPT prays to the Hon'ble Commission as under:

- i. To admit the MTR Petition as per the provisions of MERC MYT Regulations 2019, consider for further proceedings before the Hon'ble Commission;
- ii. To approve the Truing-up and Provisional truing up and Revenue Gap/(Surplus) for FY 2021-22 and FY 2022-23 and recovery of the same through tariff, as proposed by JNPT;
- iii. To approve the ARR for FY 2023-24 and FY 2024-25 and its recovery through revised tariff as proposed by JNPT;
- iv. To determine JNPT's share of the Transmission Charges and MSLDC Charges, and consider the same while approving the ARR for JNPT for the Control Period;
- v. To approve Retail Supply Tariff for FY 2023-24 and FY2024-25 and the Tariff schedule, as proposed by JNPT;
- vi. To approve the Schedule of Charges as proposed by JNPT;
- vii. Condone any inadvertent omissions, errors, short comings and permit JNPT to add/change/modify/alter this filing and make further submissions as may be required at a future date; and
- viii. Pass such other and further Orders as deemed fit and proper in the facts and circumstances of the case.

*(Signature)*

 अनिल टी. चोपडे / ANIL T. CHOPDE  
प्रबंधक ( उपयोगिता सेवाएँ )  
MANAGER (UTILITY SERVICES)  
ज.ने.प.न्यास, शेवा, नवी मुंबई 400707  
J.N.P.T., Sheva, Navi Mumbai 400707

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**Annexure -1**

**Tariff Model – Soft Copy in Excel Uploaded on E-Filing Portal**





# महाराष्ट्र विद्युत नियामक आयोग Maharashtra Electricity Regulatory Commission

79



Annexure - 2

MERC/MYT/Tariff/ 2021-22/ 549

Date: 15 December, 2021

To,

The Manager (US)

Jawaharlal Nehru Port Trust

Administration Building

Sheva, Navi Mumbai :- 400077

Subject: Application for extension in timelines for filing MYT Petition for approval of  
ARR and Tariff determination for SEZ Area.

Ref:- Your reference letter No. JNP/ M& EE/US Section/ SEZ/Power Supply/ 2021/221  
dated 18 November, 2021

Sir,

With reference to your letter under reference, I am directed to communicate that, the Commission has accorded its approval for extending the timeline for submission of MYT Tariff Petition by Jawaharlal Nehru Port Trust for its SEZ area up to 30 November, 2022.

Further the Commission has accorded approval for extension of Power Purchase Agreement with Manikaran Power Limited up to 30 June, 2022 subject to all the terms and conditions of PPA remains same.

(Dr. Rajendra G. Ambekar)  
Executive Director



Balance sheet as at 31-March-2022		In ₹ (Rupees)	
Particulars	Note	as at 31 Mar, 2022	as at 31 Mar, 2021
<b>ASSETS</b>			
<b>Non-Current Assets</b>			
(a) Property, Plant and Equipment	2	1,13,93,22,455	-
(b) Capital Work-in-Progress	3	9,68,39,521	1,11,24,37,250
(c) Investment Property			
(d) Other Intangible Assets	4		
(e) Intangible Assets under Development	5		
(f) Financial Assets			
(i) Investments			
(ii) Loans			
(iii) Other financial Assets			
(g) Deferred Tax Assets (net)			
(h) Other non current assets	6		
Total Non-Current Assets			
<b>Current Assets</b>			
(a) Inventories	7		
(b) Financial Assets			
(i) Investments			
(ii) Trade receivables	8	15,49,911	-
(iii) Cash and Cash Equivalents	9		
(iv) Bank Balances other than (iii) above			
(v) Loans			
(vi) Other financial assets			
(c) Other Current Assets	10		
Total Current Assets			
<b>Total Assets</b>		<b>1,23,77,11,886</b>	<b>1,11,24,37,250</b>
<b>EQUITY AND LIABILITIES</b>			
<b>Equity</b>			
(a) Equity Share Capital	11	-	-
(b) Other Equity	12	1,23,66,60,876	1,11,24,37,250
Total Equity		1,23,66,60,876	1,11,24,37,250
<b>Liabilities</b>			
<b>Non-Current Liabilities</b>			
(a) Financial Liabilities			
(i) Borrowings	13		
(ii) Other Non Current financial Liabilities	14		
(b) Provisions			
(c) Deferred Tax Liabilities (net)	15		
(d) Other non current Liabilities			
Total non current Liability			
<b>Current Liabilities</b>			
(a) Financial Liabilities			
(i) Borrowings			
(ii) Trade payables	16	5,06,653	
(iii) Other Current Financial Liabilities			
(b) Other Current Liabilities	17	5,44,357	
(c) Provisions	18		
(d) Current Tax Liabilities (Net)	19		
Total Current Liabilities			
<b>Total Equity and Liabilities</b>		<b>1,23,77,11,886</b>	<b>1,11,24,37,250</b>
<b>Accounting Policies</b>	1		
<b>Other Notes to Financial Statements</b>	27 to 42		

The Notes referred to above form an integral part of financial statements.

For Jagadish Laxman Sate & Co.  
Chartered Accountants  
Firm No. 146905W

CA Jagadish L Sate  
Proprietor  
M.No. 182935  
Date: 18.11.2022  
Place: Panvel



For Jawaharlal Nehru Port Authority

Mr. Gautam Kumar Das  
(Chief Manager Finance)

UDIN: 22182935 BDMY TN S168

[Note: certified as per information provided by the party]



**JAWAHARLAL NEHRU PORT AUTHORITY**  
Divisional Accounts of JNPT-SEZ Distribution Licensee

Statement of Profit and Loss for the year ended 31-March-2022

In ₹ (Rupees)

	Particulars	Note no.	For the year ended 31st March 2022	For the year ended 31st March 2021
I	Revenue from operations	20	75,79,631	-
II	Other Income	21	31,600	-
III	Total Income ( I+II)		76,11,231	-
IV	Expenses			
	Power Purchase Cost	22	1,32,23,864	-
	Employee benefit expenses	23	2,87,629	-
	Finance cost		-	-
	Depreciation and amortisation expense	24	3,18,19,482	-
	Other expenses	25	94,74,450	-
	Total expenses (IV)		5,48,05,425	-
V	Profit/(Loss) before exceptional items and tax (III-IV)		-4,71,94,194	-
VI	Exceptional Items		-	-
VII	Profit/(Loss) before Tax (V-VI)		-4,71,94,194	-
VIII	Total Tax expense	26	-	-
	(1) Current Tax			
	(2) Deferred Tax			
IX	Profit (Loss) for the period from Continuing operations (VII-VIII)		-4,71,94,194	-
X	Profit/(Loss) from dis continuing operations		-	-
XI	Tax expense of dis continuing operations		-	-
XII	Profit/(Loss) from dis continuing operations (after tax) (X-XI)		-	-
XIII	Profit/(Loss) for the period (IX+XII)		-4,71,94,194	-
XIV	Other Comprehensive income A (I) Items that will not be classified to profit or Loss (II) Income tax relating to items that will not be classified to profit or Loss			
	B (i) items that will be reclassified to profit or Loss			
	(ii) Income tax relating to items that will be reclassified to profit or Loss		-	-
XV	Total Comprehensive income for the period(XIII+XIV) (comprising profit (Loss) and other comprehensive income for the period)		-4,71,94,194	-
XVI	Earnings per equity share (for continuing operation)			
	(1) Basic			
	(2) Diluted			
XVII	Earnings per equity share (for dis continued operation)			
	(1) Basic		-	-
	(2) Diluted		-	-
XVIII	Earnings per equity share (for dis continued & Continuing operations)			
	(1) Basic		-	-
	(2) Diluted		-	-
	Accounting Policies	1		
	Other Notes to Financial Statements	27 to 42		

The Notes referred to above form an integral part of financial statements.

**Note :** The expenses incurred by JNPA (Corporate entity) are commonly used by the Distribution Licensee also and the same is not segregated under O & M expenses of the distribution business. Such expenses are non- allocable expenses.

For Jagadish Laxman Sate & Co.  
Chartered Accountants  
Firm No. 146905W

CA Jagadish L Sate  
Proprietor  
M.No. 182935  
Date: 18.11.2022  
Place: Panvel



For Jawaharlal Nehru Port Authority

Mr. Gautam Kumar Das  
(Chief Manager Finance)

UDIN: 22182935 BDMYTNS168

[ Note: certified as per information provided by the party ]



**NOTE 2 - PROPERTY, PLANT & EQUIPMENT**

SL NO.	Particulars	COST				ACCUMULATED DEPRECIATION				NET BOOK VALUE		In ₹ (Rupees)
		As at 1st April, 2021	Additions during the year	Disposal	Adjustment during the year	As at 31st March 2022	As at 1st April, 2021	Additions during the year	Disposal	Adjustment during the year	As at 31st March 2022	
1	Land											
	a) Freehold Land	-	-	-	-	-	-	-	-	-	-	-
	b) Leasehold Land (perpetual)											
2	Buildings											
	a) Building & civil work	-	-	-	-	-	-	-	-	-	-	-
	b) Drains and Culverts	-	-	-	-	-	-	-	-	-	-	-
3	Plant and Machinery											
	a) Transmissions	-	2,48,47,836	-	-	2,48,47,836	-	6,21,196	-	6,21,196	-	-
	b) Sub-stations	-	1,14,62,94,100	-	-	1,14,62,94,100	-	3,11,98,286	-	3,11,98,286	2,42,26,640	-
4	Furniture and Fixtures											
	a) Furniture	-	-	-	-	-	-	-	-	-	-	-
	b) Electrical installation	-	-	-	-	-	-	-	-	-	-	-
5	Office Equipment											
	a) Office equipment	-	-	-	-	-	-	-	-	-	-	-
	b) Electronic data processing machine	-	-	-	-	-	-	-	-	-	-	-
	c) Servers & network component	-	-	-	-	-	-	-	-	-	-	-
	d) Servicing equipment	-	-	-	-	-	-	-	-	-	-	-
	SUB-TOTAL		1,17,11,41,936	-	-	1,17,11,41,936	-	3,18,19,482	-	3,18,19,482	1,13,93,22,455	-

For Jagdish Laxman Sate & Co.  
Chartered Accountants  
Firm No. 146905W

**For Jawaharlal Nehru Port Authority**

CA Jagadish L Sate  
Proprietor  
M.No. 182935  
Date: 18.11.2022  
Place: Panvel

**Mr. Gautam Kumar Das**  
(Chief Manager Finance)



NOTE 3 - Capital Work-in-Progress

Particulars	In ₹ (Rupees)			
	As at 01.04.2021	Additions during the year	Adjustments	As at 31.03.2022
CWIP - 220/33kV Sub-Station (Sub-Note - 1)	45,16,94,945	4,47,78,510	-	-
CWIP - 33/11kV Sub-station (Sub-Note - 2)	63,88,08,048	10,78,52,118	-	9,68,39,521
CWIP - 220/33kV Transmission Line (Sub-Note - 3)	2,19,34,257	29,13,579	-	-
Total	1,11,24,37,250	15,55,44,208	-	9,68,39,521

Particulars	In ₹ (Rupees)			
	As at 01.04.2020	Additions during the year	Adjustments	As at 31.03.2021
CWIP - 220/33kV Sub-Station (Sub-Note - 1)	37,47,21,201	7,69,73,744	-	45,16,94,945
CWIP - 33/11kV Sub-station (Sub-Note - 2)	29,09,81,803	34,78,26,245	-	63,88,08,048
CWIP - 220/33kV Transmission Line (Sub-Note - 3)	-	2,19,34,257	-	2,19,34,257
Total	66,57,03,004	44,67,34,246	-	1,11,24,37,250

Note 3(1)

Break-up for CWIP 220/33kV Sub-Station

Nature of Payments	In ₹ (Rupees)
220/33kV Sub-Station	3,58,18,817
Prof./technical fee	89,59,693
Total	4,47,78,510

Note 3(2)

Break-up for CWIP 33/11kV Sub-station

Nature of Payments	In ₹ (Rupees)
Temp power supply to JNPT SEZ	-91,57,150
33/11kV Sub-station	11,50,03,227
33/11kV Sub-station-PMC	20,06,041
Total	10,78,52,118

Note 3(3)

Break-up for CWIP 220/33kV Transmission Line

Nature of Payments	In ₹ (Rupees)
220/33kV Transmission Line	29,13,579
Total	29,13,579

For Jagadish Laxman Sate & Co.  
Chartered Accountants  
Firm No. 146905W



*[Signature]*

CA Jagadish L Sate  
Proprietor  
M.No. 182935  
Date: 18.11.2022  
Place: Panvel

For Jawaharlal Nehru Port Authority

*[Signature]*

Mr. Gautam Kumar Das  
(Chief Manager Finance)



In ₹ (Rupees)		
NOTE 8 - Trade Receivables		
Particulars	as at 31-Mar-2022	as at 31-Mar-2021
JNPT SEZ Utility Services - Admin Building	3,81,959.00	-
JNPT SEZ Utility Services - 220/33KV Main Substation	7,32,862.00	-
JNPT SEZ Utility Services - 33/11 KV Substation	2,19,219.00	-
JNPT SEZ Utility Services - Substation 01 & 02 Street Light	1,33,276.00	-
JNPT SEZ Utility Services - Substation 03 Street Light	82,595.00	-
<b>Total</b>	<b>15,49,911.00</b>	<b>-</b>

In ₹ (Rupees)		
NOTE 12 - Other Equity		
Particulars	as at 31-Mar-2022	as at 31-Mar-2021
<b>CSR Reserve</b>		
Balance at the Beginning of the year	-	-
Addition during the year	-	-
Deduction during the year	-	-
Balance at the End of the year	-	-
<b>Retained Earnings</b>		
Balance at the Beginning of the year	-	-
Add : Net Profit for the year	-4,71,94,194	-
Less : Appropriations to CSR Reserve	-	-
Balance at the End of the year	-4,71,94,194	-
<b>JNPT Contribution</b>		
Balance at the Beginning of the year	1,11,24,37,250	93,40,62,376
Add : Contribution during the year	17,14,17,821	17,83,74,873
Balance at the End of the year	1,28,38,55,071	1,11,24,37,250
<b>Total</b>	<b>1,23,66,60,876</b>	<b>1,11,24,37,250</b>

In ₹ (Rupees)		
NOTE 13 - Long-Term Borrowings		
Particulars	as at 31-Mar-2022	as at 31-Mar-2021
<b>Secured</b>		
Term Loans		
From other parties		
Loan From		
Loan From		
<b>Total</b>	<b>-</b>	<b>-</b>

In ₹ (Rupees)		
NOTE 14 - Other Non-Current Financial Liabilities		
Particulars	as at 31-Mar-2022	as at 31-Mar-2021
Retention Money-		
<b>Total</b>	<b>-</b>	<b>-</b>

For Jagadish Laxman Sate & Co.

Chartered Accountants

Firm No. 146905W

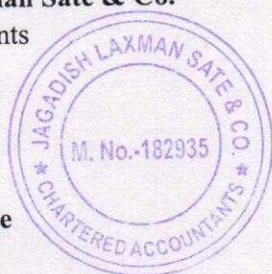
CA Jagadish L Sate

Proprietor

M.No. 182935

Date: 18.11.2022

Place: Panvel



For Jawaharlal Nehru Port Authority

Mr. Gautam Kumar Das  
(Chief Manager Finance)



**NOTE 15 - Deferred Tax Liabilities (Net)**

In ₹ (Rupees)

Particulars	as at 31-Mar-2022	as at 31-Mar-2021
As per Last Account		
Additions during the year		
<b>Total</b>	-	-

**NOTE 16 - Trade Payables**

In ₹ (Rupees)

Particulars	as at 31-Mar-2022	as at 31-Mar-2021
Manikaran Power Ltd.	5,06,653.00	-
Vertuous Energy Private Ltd.	-	-
<b>Total</b>	5,06,653.00	-

**NOTE 17 - Other Current Liabilities**

In ₹ (Rupees)

Particulars	as at 31-Mar-2022	as at 31-Mar-2021
<b>Part-2</b>		
Building Cess Tax		
Contractors/Suppliers Control A/C		
Interest Accrued on Loan		
TDS - CGST		
TDS Contractors/Sub Cont.		
TDS - IGST		
TDS - Profinal. / Tech Ser		
TDS - SGST		
<b>Part-1</b>		
Building Cess Tax		
C G S T		
Commitment & Up Front Ch. Payable		
Contractors/Suppliers Control A/C		
Contractors/Suppliers Control A/C for TDS		
Interest Accrued on Loan-REC		
S G S T		
TDS - CGST		
TDS Contractors/Sub Cont.		
TDS- Foreign / Non Resident.		
TDS - IGST		
TDS - Profinal. / Tech Ser		
TDS - Rent		
TDS - SGST.		
Audit Fee Payable		
Dead Cheque		
E M D		
Other Payables		
PF/GPF		
Salary Payable		
Security Deposit	5,44,357.00	
<b>Total</b>	5,44,357.00	-

**NOTE 18 - Provisions**

In ₹ (Rupees)

Particulars	as at 31-Mar-2022	as at 31-Mar-2021
Provisions for Employees Benefits		
Salary, PRP, Leave Encashment & Reimbursement		
Superannuation benefits		
<b>Total</b>	-	-

**NOTE 19 - Current Tax Liabilities**

In ₹ (Rupees)

Particulars	as at 31-Mar-2022	as at 31-Mar-2021
As per last year balance sheet	-	
Additions during the year	-	
Amount adjusted during the year	-	
<b>Total</b>	-	-
Net off against Advance tax and TDS	-	
<b>Total</b>	-	-

For Jagadish Laxman Sate & Co.  
Chartered Accountants  
Firm No. 146905W

CA Jagadish L Sate  
Proprietor  
M.No. 182935  
Date: 18.11.2022  
Place: Panvel



For Jawaharlal Nehru Port Authority

Mr. Gautam Kumar Das  
(Chief Manager Finance)



## NOTE 20 - Revenue from Operations

In ₹ (Rupees)

Particulars	For the year ended 31st March 2022	For the year ended 31st March 2021
Sale of Service/Goods		
Sale of Electricity to Unit Holders	61,87,897	
Sale of Electricity to Own Consumption	13,91,734	-
<b>Total</b>	<b>75,79,631</b>	<b>-</b>

## NOTE 21 - Other income

In ₹ (Rupees)

Particulars	For the year ended 31st March 2022	For the year ended 31st March 2021
Temporary Power Supply- Application and Processing Fees	31,600	-
Yearly ground rent	-	-
Building plan scrutiny / permit Fees	-	-
Development charges ss per MRTP Act	-	-
Other administrative and miscellaneous charges	-	-
Sez sale of tender fees	-	-
Sez-accrued income - Estate.	-	-
<b>Total</b>	<b>31,600</b>	<b>-</b>

## NOTE 22 - Power Purchase Cost

In ₹ (Rupees)

Particulars	For the year ended 31st March 2022	For the year ended 31st March 2021
Cost of Purchase of Power	76,72,163	-
Penalty charges incurred in power purchase	32,63,734	-
MSLDC Charges Paid for purchase of power	19,67,967	-
DSM/FBSM Registration Charges	4,00,000	-
Less : Cash Back Received from DSM	-	-
Less : Other Operating & Maint. Cost included above	80,000	-
Net Cost of Power Purchase	1,32,23,864	-
<b>Total</b>	<b>1,32,23,864</b>	<b>-</b>

## NOTE 22 - Employee Benefit Expenses

In ₹ (Rupees)

Particulars	For the year ended 31st March 2022	For the year ended 31st March 2021
Salaries and Wages (Rs.30paise/per unit sold)	2,87,629	
Contribution to Provident Fund and Other Funds		
Staff Welfare Expenses		
<b>Total</b>	<b>2,87,629</b>	<b>-</b>

## NOTE 24 - Depreciation and Amortization Expenses

In ₹ (Rupees)

Particulars	For the year ended 31st March 2022	For the year ended 31st March 2021
Depreciation of Property, Plant & Equipment	3,18,19,482	-
Amortisation of Intangible assets	-	-
<b>Total</b>	<b>3,18,19,482</b>	<b>-</b>

For Jagadish Laxman Sate &amp; Co.

Chartered Accountants

Firm No. 146905W

CA Jagadish L Sate

Proprietor

M.No. 182935

Date: 18.11.2022

Place: Panvel



For Jawaharlal Nehru Port Authority

Mr. Gautam Kumar Das  
(Chief Manager Finance)



## NOTE 25 - Other expenses

In ₹ (Rupees)

Particulars	For the year ended 31st March 2022	For the year ended 31st March 2021
Repair & Maintenance		
-Plant & Machinery		
Repair & Maint.-Sub-Stations	90,98,574	-
Repair & Maint.-Trans. Line		
R&M-Sub-Stn Security-Manpower Outsource		
R&M-Transmission-Manpower Outsource		
-Others		
Advertisement Expenses	-	-
Audit Fees		
Government Fees	2,00,000	
Books & Periodicals Expenses		
Communication Expenses		
Membership Fees	-	-
Electricity Expenses		
Other Operating and Administration Expenses (Rs.10paise/per unit sold)	95,876	
Registration Charges paid to MSLDC	80,000	
Filing Fee		
Insurance		
Legal Expenses		
Licence Fee		
Meeting Expenses		
Office Expenses		
Printing & Stationery Expenses		
Prof./technical Fee	-	-
Training Expenses	-	-
Rent		
Sitting Fee of Director		
Taxes, Brokerage & Commission		
Telephone & Mobile Expenses		
Travelling Expenses		
Vehicle Expenses	-	-
Total	94,74,450	-

## NOTE 26 - Tax Expense

In ₹ (Rupees)

Particulars	For the year ended 31st March 2022	For the year ended 31st March 2021
Tax Expense - Current		
Tax Expense - Deferred		
Total	-	-

For Jagadish Laxman Sate &amp; Co.

Chartered Accountants

Firm No. 146905W

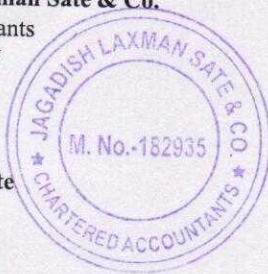
CA Jagadish L Sate

Proprietor

M.No. 182935

Date: 18.11.2022

Place: Panvel



For Jawaharlal Nehru Port Authority

  
 Mr. Gautam Kumar Das  
 (Chief Manager Finance)



पत्तन कार्यालय : प्रशासन भवन, शेवा, नवी मुंबई - 400707. Port Office : Administration Bldg., Sheva, Navi Mumbai - 400 707.  
मुख्य सतर्कता अधिकारी Chief Vigilance Officer - (022) 2724 4151 ; मुख्य प्रबंधक (प्रशासन) एवं सचिव Chief Manager (Admn.) & Secy - (022) 2724 4021 ;  
मुख्य प्रबंधक (यातायात) Chief Manager (Traffic) - (022) 2724 4191; मुख्य प्रबंधक (यां.एव.वि.अ.) Chief Manager (M&EE) - (022) 2724 4181 ;  
मुख्य प्रबंधक (वित्त) Chief Manager (Fin) - (022) 2724 4081; मुख्य प्रबंधक (प.यो.वि.) Chief Manager (PP&D) - (022) 2724 4156  
उप-संरक्षक Dy. Conservator (022) 2724 4171; हार्बर मास्टर (022) 2724 4173.  
Website : www.jnport.gov.in • E-mail : info@jnport.gov.in

Ref No: JNPT/MERC/MTR/002

20 December, 2022

The Secretary,  
Maharashtra Electricity Regulatory Commission,  
13th Floor, Centre No. 1, World Trade Centre,  
Cuffe Parade,  
Mumbai 400 005

Dear Sir,

Sub: Reply to Data gaps – Set 1 and Set 2 in relation to MTR Petition filed by JNPT-SEZ.

Ref: Email dated 9 December and 10 December 2022

The Hon'ble Commission vide its *email dated 9 December and 10 December 2022* raised data gaps in relation to MTR Petition filed JNPT SEZ.

The reply to data gaps raised by the Hon'ble Commission is enclosed herewith for kind consideration.

Thanking You,

For Jawaharlal Nehru Port Trust SEZ



Authorised Signatory

Encl: Reply to Data gaps dated 9 December 2022 and 10 December 2022 along with Exhibits

**Reply to TVS Data Gaps - Set 1**

**Petition of M/s. Jawaharlal Nehru Port Trust (JNPT) for approval of Truing-up of FY 2021-22, Provisional Truing-up of FY 2022-23 and Aggregate Revenue Requirement (ARR) and Tariff for the Multi-Year Tariff period for FY 2023-24 and FY 2024-25 for its Distribution Business in accordance with Regulation 5.1 (b) of the Maharashtra Electricity Regulatory Commission (Multi Year Tariff) Regulations, 2019.**

Sr. No	Reference to the Petition	Description/Query	JNPT Reply
<b>Executive Summary and MYT Petition</b>			
1.	Executive Summary	Petitioner should submit the Executive Summary of its MYT Petition having the summary brief approach of the Truing-up years, Provisional True-up year and ARR for the ensuing years along with the ARR summary table.	The Executive Summary of the Petition is enclosed herewith and marked as <b>Exhibit 'A'</b> .
2.	ARR Claims	Since the claimed expenses and revenue of the Petitioner is typically in Rs. Lakh as per the Allocation Statement. Thus, Petitioner instead claiming its entire ARR in Rs. Crore shall claim in 'Rs. Lakh' up to two decimal places.	JNPT submits that expenses and revenue as per the Allocation Statement are in 'Rs'. However, we have submitted the entire ARR in Rs. Crore considering the fact that it is normally adopted practice by all Utilities while submitting the Petition.
3.	Allocation Statement	Petitioner has submitted the Allocation statement for its Distribution Business. However, Petitioner the Allocation Statement does not have any reference to the Auditor Note referring to the methodology of allocating the accounts from JNPT (as an entity) to Distribution Business. Thus, Petitioner is required submit the complete Allocation statement, methodology of allocation of common expenses from the main business to the distribution business, if any,	Allocation Statement submitted as Annexure '3' to the Petition in Note 22-Employee Benefit Expenses (Pg 82 of the Petition) and Note 25 – Other Expenses (Pg 83 of the Petition) specify that the allocation of the Employee Expenses and part of A&G expense has been considered at 30 paise/unit and 10 paise/unit respectively.  As submitted in the Petition, JNPT is utilising the services of Jawaharlal Nehru Port Authority (Corporate Entity) and such

Sr. No	Reference to the Petition	Description/Query	JNPT Reply
		basis of preparing the allocation statement with Auditor Notes wherever applicable.	expenses are not segregated under O&M expenses for Distribution Business. However, JNPT, based on the Employee and A&G expense approved by the Hon'ble Commission for other SEZs in the State have considered the benchmark for the Employee Expense and A&G expense for FY 2021-22. The said expenses are escalated for each year as per WPI / CPI Escalation Index specified in the MERC MYT Regulations, 2019.
4.	Projections for next 10 years	Considering this is the first Tariff petition for the Licensee, the Petitioner is requested to submit projections for consumer category-wise no. of consumers, load, sales and demand in the next 10 year period. Such projections should be submitted in different scenarios such as optimistic, pessimistic and realistic.	<p>JNPT submits that considering the pandemic situation and scenario caused due to outbreak of COVID-19, it has affected growth in manufacturing and industrial sector and thereby affecting the potential load growth of licensee area. It is submitted that based on the actual sales/loading upto October 2022 and progress of work of various entities to whom land was allotted, it is expected that loading is likely to increase to 1.5 MW by 2023-24 and 2.3 MW by 2024-25.</p> <p>JNPT humbly submits that there is no clear visibility on the load growth as it is completely based on the revival of economic activity leading to allotment of land and progress of work even after land is allotted to them. JNPT will approach the Hon'ble Commission once there is clear visibility of growth and accordingly submit the projections in different scenarios while taking requisite approval of power procurement.</p>

Sr. No	Reference to the Petition	Description/Query	JNPT Reply												
5.	Cost audit report required	Cost audit report as per Regulation 23.4 of MYT Regulations 2019 justifying revenue expenses is not provided. Petitioner to provide the same.	JNPT submits that Cost Audit Report is not prepared and hence cannot be submitted.												
Data Gaps related to CAPEX & Capitalisation															
6.	Para 3.8.5.	<p>Petitioner to provide clarifications on the following:</p> <p>a. The Net Fixed Asset (NFA) as on 31 March 2022 is Rs. 113.94 Crore as per Note 2 of the Allocated Statement, however, under the referred paragraph, Petitioner has sought the in-principal approval from the Commission on the same NFA cost of Rs. 113.94 Crore. The Petitioner to clarify why the in-principal approval is claimed on the depreciated value of the asset.</p> <p>b. The Gross Fixed Asset as per Note 2 of the Allocated Statement during FY 2021-22 is Rs. 117.11 Crore, however, Petitioner under the referred paragraph submitted that, Rs. 104.26 Crore is capitalised during FY 2021-22. Petitioner to provide clarification on such discrepancy and provide the basis for considering the Rs. 104.26 Crore as the capitalised cost.</p>	<p>a. JNPT submits that it has claimed total capex (GFA) of Rs 113.9461457 Crore as per Note 2 of the Allocated Statement which does not include the capital cost related to Street light, whereas NFA as per Note 2 is Rs 113.9322455 Crore.</p> <p>b. It is submitted that total GFA is Rs 117.11 Crore which includes assets capitalised as well as Work in Progress as on 31.03.2022. The reconciliation of the same is as given below:</p> <table><tr><th>Particulars of Capex</th><th>Amount in Rs</th></tr><tr><td>Capitalisation as per Allocation Statement</td><td>1,17,11,41,936</td></tr><tr><td>Less: Capitalisation not claimed related to Street Light</td><td>12,85,20,000</td></tr><tr><td><b>Capitalisation claimed in MTR Petition - Put to Use</b></td><td><b>1,04,26,21,936</b></td></tr><tr><td>CWIP as per Allocation Statement</td><td>9,68,39,521</td></tr><tr><td><b>Total CAPEX claimed in MTR</b></td><td><b>1,13,94,61,457</b></td></tr></table>	Particulars of Capex	Amount in Rs	Capitalisation as per Allocation Statement	1,17,11,41,936	Less: Capitalisation not claimed related to Street Light	12,85,20,000	<b>Capitalisation claimed in MTR Petition - Put to Use</b>	<b>1,04,26,21,936</b>	CWIP as per Allocation Statement	9,68,39,521	<b>Total CAPEX claimed in MTR</b>	<b>1,13,94,61,457</b>
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Sr. No	Reference to the Petition	Description/Query	JNPT Reply																							
			Accordingly, JNPT has considered Rs 104.26 Crore towards capex which is put to use.																							
7.	Put to use of the Assets Capitalised	<p>a. Petitioner to confirm whether the entire CAPEX plan proposed before the Commission is capitalised <b>entirely</b> on Put-to-use basis during FY 2021-22 as per Regulation 24 of the MERC Tariff Regulations 2019.</p> <p>b. In case of part capitalisation, Petitioner should submit the asset wise break-up along with its respective capitalised cost and Put-to-use year, duly reconciled with the Allocated Statement for FY 2021-22.</p> <p>c. JNPT has highlighted the clause 3.12 of the Capex Regulations to claim capitalization based on asset loading, however, as per these Regulations, the licensee can claim the capitalization in proportion to actual asset loading, subject to achievement of minimum asset loading of twentyfive (25) percent. JNPT’s assets are yet to reach loading of 25%. Hence, JNPT to justify the capitalization claimed.</p> <p>d. JNPT to confirm that all its distribution assets including EHV Substation are within its Licence area boundary. Also, same are not connected to the establishments outside the Licence area.</p>	<p>a. Refer reply to query 6 (b) above</p> <p>b. The asset wise break up, which is put to use, is as given below:</p> <table><tr><th>No.</th><th>Fixed asset</th><th>Capital Cost in Rs. (As per Audited Accounts)</th></tr><tr><td>1</td><td>220/33Kv Substation with allied works including civil work</td><td>46,01,38,474</td></tr><tr><td>2</td><td>33/11Kv Substation with allied works including civil work</td><td rowspan="2">62,02,05,432</td></tr><tr><td>3</td><td>UG Cable, cable Trench, RMU and allied work</td></tr><tr><td>4</td><td>Project Management Consultancy (220/33Kv SS)</td><td>2,02,00,000</td></tr><tr><td>5</td><td>Project Management Consultancy (downstream network)</td><td>1,01,35,800</td></tr><tr><td>6</td><td>Supervision charges paid to MSETCL</td><td>2,87,81,751</td></tr><tr><td></td><td><b>Total</b></td><td><b>113,94,61,457</b></td></tr></table> <p>c. It is submitted that if capitalisation is to be claimed subject to minimum asset loading of 25%, it would lead to situation of zero capex being allowed even if power is being supplied to consumers using the assets which even after being put to</p>	No.	Fixed asset	Capital Cost in Rs. (As per Audited Accounts)	1	220/33Kv Substation with allied works including civil work	46,01,38,474	2	33/11Kv Substation with allied works including civil work	62,02,05,432	3	UG Cable, cable Trench, RMU and allied work	4	Project Management Consultancy (220/33Kv SS)	2,02,00,000	5	Project Management Consultancy (downstream network)	1,01,35,800	6	Supervision charges paid to MSETCL	2,87,81,751		<b>Total</b>	<b>113,94,61,457</b>
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Sr. No	Reference to the Petition	Description/Query	JNPT Reply
			<p>use is not allowed to be claimed in tariff. Accordingly, JNPT submits that the capitalisation is not claimed for the entire capex put to use but in proportion to the actual asset loading considering the fact that if entire capex of Rs 104.26 Crore is claimed it will burden the consumer considering the lower sales.</p> <p>d. JNPT confirms that all its distribution assets including EHV Substation are within its Licence area boundary and are not connected to the establishments outside the Licence area.</p>
8.	Asset Loading	<ul style="list-style-type: none"> <li>Petitioner under Para. 3.8.5 of its Petition has referred to Regulation 3.12 of the MERC (Approval of Capital Investment Schemes) Regulations, 2022 for proportionating the capex/capitalisation to actual asset loading. However, it is observed that, the Load (MW) for different years submitted as per Format F1.5 is different from the Load (MW) used for proportionating the Capitalisation of the assets for the respective years. Thus, the Petitioner is required to provide clarity for the highlighted discrepancy.</li> </ul>	JNPT submits that it will correct the inadvertent linkage error in revised Tariff Model and Petition.
<b>Truing -up of FY 2021-22 and Provisional True-up of FY 2022-23, ARR for FY 2023-24 and FY 2024-25</b>			
9.	Reconciliation statement	<ul style="list-style-type: none"> <li>Please provide reconciliation statement of the numbers in the petition format and numbers in the audited accounts.</li> </ul>	The reconciliation statement along with remarks is annexed hereto and marked as <b>Exhibit 'B'</b> .

Sr. No	Reference to the Petition	Description/Query	JNPT Reply
10.	Power Purchase Cost (Table 3.6)	<p>a. Petitioner has claimed the Power Purchase Cost of Rs. 0.60 Crore during FY 2021-22, however, the Net Power Purchase Cost booked as per the Audited Allocation Statement is Rs. 1.32 Crore for the same year. Thus, Petitioner should provide the justifications for such discrepancy and provide the reconciliation of the actual power purchase cost claimed under the present petition with the Audited Allocation Statement for FY 2021-22.</p> <p>b. Petitioner should provide the break-up Solar RECs and Non-Solar RECs purchased during FY 2021-22 with respective quantum and cost details. In addition, Petitioner shall also demonstrate the RPO compliance for FY 2021-22 w.r.t. to Solar and Non-Solar Target applicable for FY 2021-22 as per “Maharashtra Electricity Regulatory Commission (Renewable Purchase Obligation, its Compliance and Implementation of Renewable Energy Certificate Framework) Regulations, 2019.</p> <p>c. Petitioner shall also submit a separate table for estimating the RPO compliance for Solar and Non-Solar targets for FY 2022-23 to FY 2024-25 as per the applicable targets for the respective years in lines with MERC (RPO) Regulations, 2019 and provides its plan</p>	<p>a. The reconciliation statement along with remarks is annexed hereto and marked as <b>Exhibit ‘B’</b>.</p> <p>b. JNPT submits that it has purchased 80 Solar RECs and 150 Non-Solar RECs to meet the RPO for FY 2021-22. However, considering the Input Energy of 1.46 MU, there is shortfall of 0.01 MU for Solar and 0.02 MU for Non-Solar. The consolidated table is given below in reply of query below.</p> <p>As elaborated in the reply of the query below, JNPT has proposed to meet the RPO shortfall for FY 2021-22 and FY 2022-23 by purchasing RE power in FY 2023-24 to lower the impact on tariff of its consumers.</p> <p>c. JNPT submits that it has proposed to meet RPO targets for FY 2022-23 by way of purchase of REC and any shortfall shall be carried forward to FY 2023-24. It is submitted that JNPT has filed the Petition on 29 November, 2022 and has considered actual REC purchase as on date of filing the Petition. However, subsequently on 30 November, 2022 it has purchased REC (85-Solar and 125-Non-Solar) to meet the RPO. JNPT will consider the said purchase of REC’s in the revised Petition and also accordingly revise the RE</p>



Sr. No	Reference to the Petition	Description/Query	JNPT Reply																																																																								
		for compliance of the RPO	<p>power required for FY 2023-24 and FY 2024-25.</p> <p>JNPT requests the Hon’ble Commission to allow carry forward of RPO shortfall for FY 2021-22 and FY 2022-23 to FY 2023-24. It is proposed to purchase RE Power to meet the RPO for FY 2023-24 and FY 2024-25. The table giving details of the RPO target and achievement by JNPT in the table below:</p> <table><tr><th>RPO Targets &amp; Achievement</th><th>Units</th><th>FY 2021-22</th><th>FY 2022-23</th><th>FY 2023-24</th><th>FY 2024-25</th></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Total Energy Requirement</td><td>MU</td><td>1.46</td><td>5.24</td><td>9.62</td><td>14.32</td></tr><tr><td>Solar RPO target</td><td>%</td><td>6.00%</td><td>8.00%</td><td>10.50%</td><td>13.50%</td></tr><tr><td>Solar RPO target</td><td>MU</td><td>0.09</td><td>0.42</td><td>1.01</td><td>1.93</td></tr><tr><td>Solar RPO Achievement</td><td>MU</td><td>0.08</td><td>0.35</td><td>1.09</td><td>1.93</td></tr><tr><td>Solar RPO Shortfall/(Surplus)</td><td>MU</td><td>0.01</td><td>0.08</td><td>-</td><td>-</td></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Non-Solar RPO target</td><td>%</td><td>11.50%</td><td>11.50%</td><td>11.50%</td><td>11.50%</td></tr><tr><td>Non-Solar RPO target</td><td>MU</td><td>0.17</td><td>0.60</td><td>1.11</td><td>1.65</td></tr><tr><td>Non-Solar RPO Achievement</td><td>MU</td><td>0.15</td><td>0.50</td><td>1.23</td><td>1.65</td></tr><tr><td>Non-Solar RPO Shortfall/(Surplus)</td><td>MU</td><td>0.02</td><td>0.12</td><td>-</td><td>-</td></tr></table>	RPO Targets & Achievement	Units	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25							Total Energy Requirement	MU	1.46	5.24	9.62	14.32	Solar RPO target	%	6.00%	8.00%	10.50%	13.50%	Solar RPO target	MU	0.09	0.42	1.01	1.93	Solar RPO Achievement	MU	0.08	0.35	1.09	1.93	Solar RPO Shortfall/(Surplus)	MU	0.01	0.08	-	-							Non-Solar RPO target	%	11.50%	11.50%	11.50%	11.50%	Non-Solar RPO target	MU	0.17	0.60	1.11	1.65	Non-Solar RPO Achievement	MU	0.15	0.50	1.23	1.65	Non-Solar RPO Shortfall/(Surplus)	MU	0.02	0.12	-	-
RPO Targets & Achievement	Units	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25																																																																						
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Sr. No	Reference to the Petition	Description/Query	JNPT Reply
			The certificate issued by IEX towards purchase of REC is annexed hereto and marked as <b>Exhibit 'C'</b> .
11.	Para 3.7.6	<ul style="list-style-type: none"> <li>In table 3-8 in column titled category of expenses - 'Operating &amp; Admin Exp' and 'A&amp;G Expenses' need to be interchanged. Please correct the error.</li> </ul>	JNPT submits that inadvertent error will be corrected in the revised Petition.
12.	Distribution Loss	<ul style="list-style-type: none"> <li>a. Petitioner has claimed the Distribution loss of 36.92% during FY 2021-22 on account of higher No-Load Losses. In this context, Petitioner shall submit the details of equipment wise guaranteed no-load loss, guaranteed no load loss, equipment full load capacity, number of hours of operation in a year, actual loading of the equipment's (Distribution Transformers, etc) vis-à-vis full load capacity loading.</li> <li>b. Petitioner to clarify whether it has taken all necessary steps for reducing the no load loss.</li> <li>c. Petitioner should submit the actual T&lt;&gt; D Interface drawl/consumption in MU duly certified by the Maharashtra SLDC for FY 2021-22.</li> </ul>	<ul style="list-style-type: none"> <li>a. The relevant details of transformer wise losses and loading is annexed hereto and marked as <b>Exhibit 'D'</b>.</li> <li>b. It is submitted that the Petitioner has optimised the operations of the network by switching off the equipments based on the demand and is likely to achieve much lower losses in FY 2022-23 (estimated as 14.05%) as compared to FY 2021-22 (36.92%).</li> <li>c. JNPT submits that it has requested MSLDC to certify the actual T&lt;&gt;D drawl vide its email dated 1 November, 2022 and 13 December, 2022, enclosed as <b>Exhibit 'E'</b>. The same is yet to be received and the same will be submitted as soon as the certificate is issued by MSLDC.</li> </ul>
13.	O&M Expenses	<ul style="list-style-type: none"> <li>Petitioner under Para. 3.7.9 of its MYT Petition has claimed the R&amp;M Expenses in proportion to actual and estimated load of the JNPT SEZ. However, Petitioner should clarify whether, it is foregoing the R&amp;M Expenses booked for the respective financial years or</li> </ul>	JNPT submits that it will claim R&M expenses in proportion to actual load of the JNPT SEZ at the time of truing up of respective years (FY 2022-23 to FY 2024-25) and not at actuals.

Sr. No	Reference to the Petition	Description/Query	JNPT Reply
		the same shall be recovered subsequently as and when the load increases. In case, if the same is being proposed to be recovered in the subsequent years, the Petitioner is required to demonstrate the overall impact of the cost burden for the respective financial years i.e., from FY 2021-22 to FY 2024-25.	
14.	Table 3-9, Table 3-10 and Table 3-11	<p>a. The values for A&amp;G Expenses and R&amp;M expense in table 3-11 are interchanged with respect to those in Table 3-9 and Table 3-10.</p> <p>b. Please provide separate table in the petition for year-wise total Employee expenses. The same is missing in the current petition.</p> <p>c. The Petitioner should provide the numbers of category-wise employees dedicated to the Distribution business, for each year till date since operationalization of the Distribution business.</p> <p>d. The Petitioner has stated that is utilising the services of JNPT Authority (Corporate Entity) and such expenses are not segregated under O&amp;M expenses for Distribution Business. However, JNPT, based on the Employee and A&amp;G expense approved by the Commission for other SEZs in the State have considered the benchmark such as for the Employee Expense - 30 paise/unit and A&amp;G expense - 10</p>	<p>a. JNPT submits that it will correct the inadvertent error in the revised Petition.</p> <p>b. JNPT submits that it will include the same in the revised Petition</p> <p>c. JNPT submits that being an initial phase of the license, whereby the load has not commensurate as per the load envisaged at the time of commencement of distribution business due to various reasons, JNPT has allocated common employees of JNPA to look after the distribution business. Hence there are no dedicated employees at present allocated to JNPT Distribution licensee business.</p> <p>d. JNPT submits that considering the miniscule business activity of SEZ at present, JNPA (Corporate Entity equivalent) provides the support related to employee allocation, common services of Central Procurement, Group Finance and HR, Centralized IT services, Administration, Security and other common departments. JNPT submits that similar to integrated utilities, common</p>

Sr. No	Reference to the Petition	Description/Query	JNPT Reply
		<p>paaise/unit for FY 2021-22. In this context, it is expected that the actual expenses are required to be claimed for truing up years. It appears that for JNPT Distribution Licensee, there is no outflow currently towards such expenses (and also no outflow expected in future too). The Licensed businesses are expected to be undertaken in water-tight compartment. Further, although JNPT has benchmarked the employee and A&amp;G expenses based on other SEZs, no fixed ratio exists between the sales and these expenses. Also, other SEZs are privately own SEZs whereas JNPT is Government owned entity. Hence, JNPT needs to justify its submissions on the employee expenses and A&amp;G expenses.</p>	<p>cost is allocated to each segment of business and the similar approach was undertaken by Reliance Infrastructure Limited (RInfra) whereby the Corporate expenses of RInfra represent the expenses pertaining to common services of Central Procurement, Group Finance and HR, Centralized IT services, Administration, Security and other common departments where the resources and personnel available were rendering the services to the entire RInfra Corporate and accordingly the expenses pertaining to these departments were allocated to all the individual business segments within RInfra, such as the Mumbai energy vertical, EPC business, Wind power plants, etc., on the basis of Turnover of these individual business segments. Hence the precedence of such cases are also available. Accordingly, similar methodology has been adopted by JNPT. JNPT would like to submit that as stated in the query that there is no actual outflow currently towards such expenses is incorrect as such expenses are incurred for the distribution business but by JNPA and then allocated to JNPT based on the principles as specified in the Allocation statement. Further, JNPT submits that even though the benchmark considered are of private licensee whereas JNPT is a government entity, the activities related to operation of distribution business more or less remains</p>

Sr. No	Reference to the Petition	Description/Query	JNPT Reply
			<p>same. Also, as provided in the calculation in MTR petition format “Sheet – Others”, the average of private and government licensee (MADC) has been considered whereby it is noticed that even within private licensee, there is a major variation in the O&amp;M expenses whereby in the initial year the O&amp;M cost is on a higher side. However, JNPT in its submission has considered the average O&amp;M expenses of 4 years of private and Government licensee and JNPT has adopted a more rationale approach for claiming O&amp;M expenses.</p>
e.	Interest on Long Term Loan (Para. 3.11.3)	Petitioner to submit the weighted average Interest Rate Certificate of 3.28% duly certified from the Auditor for FY 2021-22 and FY 2022-23 up to H1 or latest available month.	We will revert to the same shortly.
f.	Contribution to Contingency Reserves (Table 3.21)	Petitioner to clarify whether there is any investment made for the Contribution to Contingency reserve during FY 2022-23 as per the Regulation 35.1 of the MERC MYT Regulations, 2019. If yes, the relevant documentary evidence shall be submitted for the invested amount.	JNPT submits that since the opening GFA has been zero for both Wires and Retail Supply Business, Contribution to Contingency Reserve has not been claimed for FY 2021-22. Accordingly, there is no investment made during FY 2022-23.
g.	Return on Equity (Para. 3.13.5)	a. Petitioner to submit the computation of arriving at the <b><u>wire’s availability of 99.80%</u></b> as per the formula provided under Regulation 29.8 of the MERC MYT Regulations, 2019. Further, the Petitioner to also provide the SAIDI recorded for FY 2021-22 duly	<p>a. We will revert to the same shortly.</p> <p>b. It is submitted that JNPT commenced its operations in August 2021 and FY 2021-22 is first year of commencement of operations. Accordingly, the</p>

Sr. No	Reference to the Petition	Description/Query	JNPT Reply
		<p>certified by the Auditor.</p> <p>b. Petitioner to submit the auditor certificate for certifying its <b><u>collection efficiency of 99.50%</u></b> for FY 2020-21 with respect to Revenue billed to its consumers vis-à-vis Revenue booked during FY 2021-22 as per the Allocated Statement submitted as part of the present Petition.</p>	<p>collection of billing done during the month March 22 is in the month of April 22. JNPT has considered the said collection in FY 2021-22 for computing Collection Efficiency. During the normal course of operations, there would be overlap of collection in the month of April which would not have any impact. Considering the 1<sup>st</sup> year of operation, JNPT requests the Hon'ble Commission to consider the Collection Efficiency 99.50% for FY 2021-22. The certificate will be submitted shortly.</p>
18.	Consumer security deposit (Para. 3.12.2)	JNPT SEZ has considered 5% increase in CSD from FY 2022-23 to FY 2024-25 on account of lack of past data. Is there any basis such as increase in load over the year considered while assuming 5% increase in CSD? If yes, please provide details.	JNPT has projected the Consumer Security Deposit (CSD) by considering 5% increase in CSD from FY 2022-23 to FY 2024-25, on account of lack of past data. The actual increase in CSD shall be submitted at the time of Truing-up for the respective years
19.	Revenue from sale of electricity (Table 3.23)	<ul style="list-style-type: none"> <li>The Petitioner has booked the total revenue from operations for FY 2021-22 as per the Allocation Statement is Rs. 0.76 Crore, out of which the revenue booked from sale to electricity consumers is Rs. 0.62 Crore. It is observed that, under the referred table, the total revenue claimed by the Petitioner for FY 2021-22 is Rs. 0.87 Crore. Thus, Petitioner is required to provide the justifications for such highlighted discrepancy.</li> </ul>	<ul style="list-style-type: none"> <li>JNPT would like to submit that as per Allocation Statement, Revenue from Sale of Electricity is Rs. 0.76 Crore which includes sale of power to JNPT-SEZ itself as well as to other consumers. Since the power is sold to JNPT SEZ, the same is also charged at approved tariff and is part of the revenue.</li> <li>JNPT would like to submit that at the time of preparation of the allocation statement, the revenue was considered equivalent to the electricity billed till March 2022.</li> </ul>

Sr. No	Reference to the Petition	Description/Query	JNPT Reply																																											
		<ul style="list-style-type: none"> <li>Further, the Petitioner should also reconcile the category wise revenue realised during FY 2021-22 with the Audited Allocation statement.</li> <li>Please provide the basis for estimation of category-wise revenue in FY 2022-23.</li> </ul>	<p>However, energy consumed in March 2022 against which the bill were raised in April 2022 was not considered as a part of Revenue in Allocation Statement but the same has been included in the Revenue in MTR Petition. the Reconciliation of the same is outlined in the following table:</p> <table border="1"> <thead> <tr> <th rowspan="2">Component of Revenue</th><th colspan="3">Revenue Billed</th></tr> <tr> <th>Till March</th><th>in April</th><th>Total</th></tr> </thead> <tbody> <tr> <td>Demand Charges</td><td>0.237</td><td>0.053</td><td>0.290</td></tr> <tr> <td>Energy Charges</td><td>0.382</td><td>0.133</td><td>0.516</td></tr> <tr> <td>Wheeling Charges</td><td>0.055</td><td>0.018</td><td>0.073</td></tr> <tr> <td>TOD Charges</td><td>-0.001</td><td>-0.001</td><td>-0.002</td></tr> <tr> <td>Prompt Payment Discount</td><td>-0.004</td><td></td><td>-0.004</td></tr> <tr> <td>Revenue as per MTR</td><td><b>0.669</b></td><td><b>0.203</b></td><td><b>0.872</b></td></tr> <tr> <td>Electricity Duty</td><td>0.077</td><td>0.034</td><td>0.110</td></tr> <tr> <td>TOSE</td><td>0.012</td><td>0.004</td><td>0.016</td></tr> <tr> <td><b>Total Revenue as per Allocation Statement</b></td><td><b>0.758</b></td><td><b>0.241</b></td><td><b>0.999</b></td></tr> </tbody> </table> <ul style="list-style-type: none"> <li>JNPT would like to submit that as specified in the MTR Petition, it is presently supplying to 17 Consumers with Contract Demand of 2.15 MVA and has total demand of upto 1 MW. Further, JNPT has received additional applications for 0.85 MVA for supply of regular power in FY 2022-23. Also, actual sales/loading upto October 2022 has been considered and future projection is based on the application received from other consumers. Further for estimating the revenue, Wheeling charges and fixed</li> </ul>	Component of Revenue	Revenue Billed			Till March	in April	Total	Demand Charges	0.237	0.053	0.290	Energy Charges	0.382	0.133	0.516	Wheeling Charges	0.055	0.018	0.073	TOD Charges	-0.001	-0.001	-0.002	Prompt Payment Discount	-0.004		-0.004	Revenue as per MTR	<b>0.669</b>	<b>0.203</b>	<b>0.872</b>	Electricity Duty	0.077	0.034	0.110	TOSE	0.012	0.004	0.016	<b>Total Revenue as per Allocation Statement</b>	<b>0.758</b>	<b>0.241</b>	<b>0.999</b>
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Sr. No	Reference to the Petition	Description/Query	JNPT Reply
			charges are considered as per MSEDCL Tariff Order dated 30 <sup>th</sup> March 2020 as the same being the ceiling tariff for JNPT. With respect to energy charges, the Hon'ble Commission vide its Order dated 30 January, 2021 in Case No. 5 of 2021, had approved the ceiling tariff for JNPT as the Tariff that is applicable for the respective category of consumers in the MSEDCL area of supply, as modified from time to time and has approved the corresponding Tariff Schedule for Industrial Tariff for Industrial consumers and Commercial Tariff for the facilities established within the licence area of JNPT. JNPT submits that as per Order of the Hon'ble Commission, it was allowed to levy ceiling tariff of MSEDCL. Accordingly, JNPT has levied the tariff considering the MSEDCL tariff as ceiling tariff and not exceeded the MSEDCL tariff for any tariff category.
20.	Provisional Accounts FY 2022-23	<ul style="list-style-type: none"> <li>Petitioner to submit the Provisional Allocated Statement for FY 2022-23 for H1 or up to latest available month.</li> </ul>	The statement will be submitted along with the revised Petition.
21.	Income Tax	<ul style="list-style-type: none"> <li>Petitioner to submit the ITR acknowledgement for the tax paid during FY 2021-22 (JNPT as an entity) to verify the effective tax rate.</li> </ul>	The ITR acknowledgement for the tax paid for FY 2021-22 is annexed hereto and marked as <b>Exhibit 'F'</b> .
22.	Form 12	<ul style="list-style-type: none"> <li>Petitioner for computing the Effective tax rate has considered the gross income from the Regulated entity</li> </ul>	JNPT submits that revenue of regulated entity (JNPT SEZ) is 0.76 Crore whereas revenue of Rs 859.65 Crore is of JNPA,



Sr. No	Reference to the Petition	Description/Query	JNPT Reply
		as Rs. 859.65 Crore, however, the total income/revenue booked as per the allocation statement's P&L statement is Rs. 0.76 Crore. Petitioner should provide the justification for such discrepancy highlighted above.	which is a corporate entity. Hence, the revenue of only regulated entity is being considered in the Petition.
23.	Form 9	<ul style="list-style-type: none"> <li>Petitioner should do the total summation of the Non-Tariff Income claimed for the respective years.</li> </ul>	JNPT will comply with the same in the revised Petition.
<b>Data Gaps related to Tariff Philosophy and Schedule of Charges</b>			
24.	Paragraph 4.3	<ul style="list-style-type: none"> <li>On 21<sup>st</sup> July 2022 MERC has published Guidelines for allocation of assets and cost at different voltage levels for distribution. The guidelines are available on MERC's website. The Petitioner is required to refer the guidelines and submit (i) roadmap for acquisition of requisite hardware and software (according to guideline 6.2) and (ii) submit its asset ratios and consequent division of various items of Distribution Wires ARR over different voltages (according to guideline 6.1).</li> <li>Petitioner should submit the voltage wise asset details along with the respective cost break-up for the respective financial years.</li> </ul>	JNPT submits that it has claimed capitalisation in proportion to the load and also claimed wheeling charges without bifurcating the same into HT and LT. It is submitted that since JNPT has claimed lower capitalisation than actually incurred, it is difficult to bifurcate the same voltage-wise as sought for in the data gaps.
25.	Paragraph 4.4	<ul style="list-style-type: none"> <li>Petitioner to provide the basis for estimating the Fixed Charges for FY 2023-24 and FY 2024-25.</li> </ul>	JNPT submits that the fixed charges for Revenue as proposed were envisaged to meet the fixed cost as envisaged in the ARR

Sr. No	Reference to the Petition	Description/Query	JNPT Reply																								
		<ul style="list-style-type: none"><li>Petitioner to further clarify, whether the Fixed Cost recovery for the ensuing years will be recovered from the proposed Fixed Charges across the Consumer Categories or some part of the Fixed Component is proposed to be recovered through Energy Charges.</li></ul>	<p>– Retails Supply business and outlined as below:</p> <table><tr><th>Particulars</th><th>2023-24</th><th>2024-25</th></tr><tr><td>Revenue from Demand</td><td>1.43</td><td>1.90</td></tr><tr><td><b>Fixed Cost</b></td><td></td><td></td></tr><tr><td>ARR of Retails Supply business</td><td>5.37</td><td>8.05</td></tr><tr><td>Less: 85% of power purchase cost</td><td>3.91</td><td>5.91</td></tr><tr><td></td><td></td><td></td></tr><tr><td><b>Fixed Cost</b></td><td><b>1.46</b></td><td><b>2.14</b></td></tr><tr><td><b>Fixed Cost Recovery*</b></td><td><b>102%</b></td><td><b>113%*</b></td></tr></table> <p>*- Table may revise the same in Revised MTR submission based on the revised ARR due to changes to be incorporated in response to Data gaps raised by the Hon’ble Commission</p>	Particulars	2023-24	2024-25	Revenue from Demand	1.43	1.90	<b>Fixed Cost</b>			ARR of Retails Supply business	5.37	8.05	Less: 85% of power purchase cost	3.91	5.91				<b>Fixed Cost</b>	<b>1.46</b>	<b>2.14</b>	<b>Fixed Cost Recovery*</b>	<b>102%</b>	<b>113%*</b>
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26.	Paragraph 4.7	<ul style="list-style-type: none"><li>Petitioner to submit a proper detailed ‘Schedule of Charges’ proposed for the ensuing years i.e., FY 2023-24 and FY 2024-25, while referring to the charges approved for MSEDCL as proposed in the present Petition.</li></ul>	<p>JNPT submits that being an SEZ it has developed the network in a manner that any new Consumer is able to get the connection in plug and play manner and no incremental network is required to be laid by Distribution Licensee to release supply to the Consumer. Accordingly, JNPT is not proposing any Schedule of Charges for release of supply to Consumer except for the following charges as given below:</p> <p>A. Administrative Charges for Dishonouring the Cheque – Rs 750 or Bank Charges whichever is higher.</p> <p>B. Processing Fees for Open Access – Rs 2500/- per application</p> <p>C. Operating Charges for Open Access – Rs 2500/- per</p>																								

Sr. No	Reference to the Petition	Description/Query	JNPT Reply
			<p>month.</p> <p>The aforesaid charges are being proposed in line with the charges approved for other SEZ's in the State. Further, same would be included in the revised Petition.</p>

**Reply to Data Gaps-Set-2 dated 10.12.2022**

**Petition of M/s. Jawaharlal Nehru Port Trust (JNPT) for approval of Truing-up of FY 2021-22, Provisional Truing-up of FY 2022-23 and Aggregate Revenue Requirement (ARR) and Tariff for the Multi-Year Tariff period for FY 2023-24 and FY 2024-25 for its Distribution Business in accordance with Regulation 5.1 (b) of the Maharashtra Electricity Regulatory Commission (Multi Year Tariff) Regulations, 2019.**

Sr No	Reference to the Petition	Description/Query	JNPT Reply																											
Truing -up of FY 2021-22 and Provisional True-up of FY 2022-23, ARR for FY 2023-24 and FY 2024-25																														
1.	Power Purchase Cost (Table 3.6)	<ul style="list-style-type: none"><li>Petitioner to provide the REC Certificates of both Solar and Non-Solar along with the payment receipts for FY 2021-22 and FY 2022-23 (available upto latest months)</li></ul>	The copy of the REC Certificates are annexed marked as <b>Exhibit ‘C’</b> to reply of Data gaps Set-1.																											
2.	Existing Tariff	<ul style="list-style-type: none"><li>Petitioner under para 2.3.1. has submitted the following: “.....Accordingly, from 11 August, 2021, <u>JNPT charged ceiling tariff as applicable to respective categories for retail sale of electricity in its licence area, except for FAC, which was not charged....</u>” In this context, Petitioner to provide clarification for adopting different tariff rates for its consumers as under:<table><tr><th rowspan="2">Category (FY 2021-22)</th><th colspan="2">Fixed/Demand Charges</th><th colspan="2">Wheeling Charges (Rs/Unit)</th><th colspan="2">Energy Charges (Rs/Unit)</th></tr><tr><th>JNPT</th><th>MSEDCL</th><th>JNPT</th><th>MSEDCL</th><th>JNPT</th><th>MSEDCL</th></tr><tr><td>LT II A (0 to 20KW)</td><td>Rs. 415/month</td><td>Rs. 415/month</td><td>1.38</td><td>1.38</td><td>5.57</td><td>7.18</td></tr><tr><td>LT II B (&gt;20 KW)</td><td>Rs 415 /kVA/Month</td><td>Rs 415 /kVA/Month</td><td>1.38</td><td>1.38</td><td>5.57</td><td>10.79</td></tr></table></li></ul>	Category (FY 2021-22)	Fixed/Demand Charges		Wheeling Charges (Rs/Unit)		Energy Charges (Rs/Unit)		JNPT	MSEDCL	JNPT	MSEDCL	JNPT	MSEDCL	LT II A (0 to 20KW)	Rs. 415/month	Rs. 415/month	1.38	1.38	5.57	7.18	LT II B (>20 KW)	Rs 415 /kVA/Month	Rs 415 /kVA/Month	1.38	1.38	5.57	10.79	JNPT submits that as per Order of the Hon’ble Commission, it was allowed to levy ceiling tariff of MSEDCL. Accordingly, JNPT has levied the tariff considering the MSEDCL tariff as ceiling tariff and not exceeded the MSEDCL tariff for any tariff category.
Category (FY 2021-22)	Fixed/Demand Charges			Wheeling Charges (Rs/Unit)		Energy Charges (Rs/Unit)																								
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Sr No	Reference to the Petition	Description/Query							JNPT Reply
		and <=50 KW)							
		LT II C (>50KW)	Rs 415 /kVA/Month	Rs 415 /kVA/Month	1.38	1.38	5.57	12.95	
		HT I(A) Industrial	Rs 432/kVA/Month	Rs 432/kVA/Month	0.56	0.56	5.57	6.96	
		HT II Commercial	Rs 432/kVA/Month	Rs 432/kVA/Month	0.56	0.56	5.04	11.20	
		LTVII (B) (ii) LT Public Service – Others	Provide appropriate slab referring to MSEDCL's Tariff Schedule						
		LTV (ii) LT Industries	Rs 312/kVA/Month	Rs 312/kVA/Month	1.38	1.38	5.30	5.93	
		<b>Category (FY 2022-23)</b>	<b>Fixed/Demand Charges</b>		<b>Wheeling Charges (Rs/Unit)</b>		<b>Energy Charges (Rs/Unit)</b>		
			<b>JNPT</b>	<b>MSEDCL</b>	<b>JNPT</b>	<b>MSEDCL</b>	<b>JNPT</b>	<b>MSEDCL</b>	
		LT II A (0 to 20KW)	Rs. 415/month	Rs. 427/month	1.35	1.35	5.57	7.01	
		LT II B (>20 KW and <=50 KW)	Rs 415 /kVA/Month	Rs 427/kVA/Month	1.35	1.35	5.57	10.79	
		LT II C (>50KW)	Rs 415 /kVA/Month	Rs 427 /kVA/Month	1.35	1.35	5.57	12.76	
		HT I(A)	Rs	Rs	0.55	0.55	5.57	6.89	

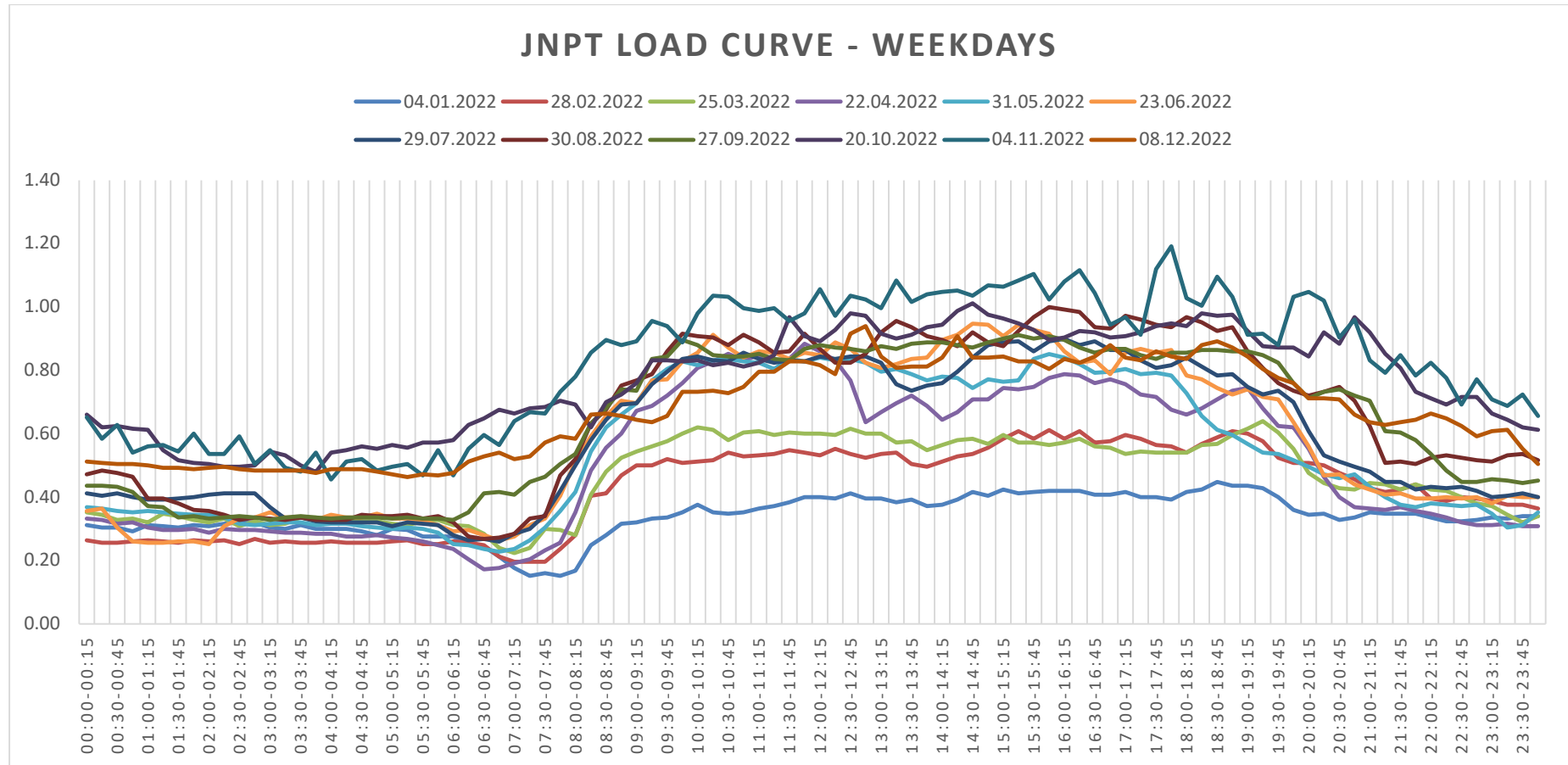
Sr No	Reference to the Petition	Description/Query								JNPT Reply
		Industrial	432/kVA/Month	454/kVA/Month						
		HT II	Rs	Rs	0.55	0.55	5.04	10.95		
		Commercial	432/kVA/Month	454/kVA/Month						
		LTVII (B) (ii) LT Public Service – Others	Provide appropriate slab referring to MSEDCL’s Tariff Schedule							
		LTV(ii) LT Industries	Rs 312/kVA/Month	Rs 321/kVA/Month	1.35	1.35	5.30	6.05		
3.	Green Energy Tariff	<ul style="list-style-type: none"><li>Petitioner has not proposed Green Tariff for Consumers who opt for supply of RE power from Distribution Licensee. In this context, Petitioner to propose the methodology to levy Green Tariff and charges for the same.</li></ul>								It is submitted that there are only 17 consumers in the area of supply of JNPT SEZ. Further, till date no consumer has opted for Green Tariff. JNPT proposes to continue with existing 66 paise/unit which is approved by the Hon’ble Commission to be continued for FY 2023-24 and FY 2024-25.
4.	Form F 21	<ul style="list-style-type: none"><li>Petitioner should fill the Format F21, which is kept blank as per the enclosed Tariff Formats.</li></ul>								It is submitted that JNPT has claimed capitalisation of capex in proportion to the asset loading which is very miniscule as compared to total capex incurred by JNPT. Thus, Format F21 would not be the correct reflection of the actual assets capitalised and depreciation of the said

Sr No	Reference to the Petition	Description/Query	JNPT Reply
			assets.
<b>Data Gaps related to Tariff Philosophy</b>			
5.	Proposed Tariff Schedule	<ul style="list-style-type: none"> <li>Petitioner to provide clarification for the following deviations taken under the “Miscellaneous and General Charges” Chapter with respect to the prevailing Definition and conditions of the referred chapter provides under Case No. 322 of 2019, dated 31 March 2020:               <ol style="list-style-type: none"> <li>Why ‘Rebate for Incremental Consumption’ and “Rebate on Bulk Consumption’ to HT Industry consumers is not proposed?</li> <li>‘Penalty for exceeding Contract Demand’ proposed conditions are different from prevailing conditions.</li> <li>‘Consumer Security Deposit’ proposed conditions are different from prevailing conditions.</li> <li>‘Sanctioned Load’ definition is different.</li> </ol> </li> </ul>	<ol style="list-style-type: none"> <li>Considering the load profile of existing consumers, JNPT has not proposed any ‘Rebate for Incremental Consumption’ and “Rebate on Bulk Consumption’ as is the case with MSEDCL.</li> <li>The conditions proposed in respect of ‘Penalty for exceeding Contract Demand’ and ‘Consumer Security Deposit’ and definition of ‘Sanctioned Load’ are in accordance with the tariff order dated 21 July, 2022 in Case No 235 of 2020 for MADCL.</li> </ol>
6.	Prepaid Meter Connection	<ul style="list-style-type: none"> <li>Petitioner to clarify whether any proposal or choice is given to its existing consumers for opting Prepaid Meter Connections.</li> </ul>	JNPT submits that it has not received any request for any Prepaid meter connection. As an when such request is received, JNPT may consider the same.
7.	ToD Tariff	<ul style="list-style-type: none"> <li>Petitioner should submit the detailed estimation of the ToD Rates for FY 2023-24 and FY 2024-25 based on the recommendations provided for EON SEZ under the “REPORT ON STUDY OF TIME OF DAY (TOD) TARIFF STRUCTURE IN ELECTRICITY TARIFF IN MAHARASHTRA” published</li> </ul>	It is submitted that load curve of JNPT as shown below clearly shows that there is less load during 22:00 Hrs to 6:00 Hrs and same needs to be incentivised to flatten the curve. Similarly, to

Sr No	Reference to the Petition	Description/Query	JNPT Reply
		in September 2022.	reduce the peak demand by shifting the load to other time blocks, higher TOD rates are being proposed in the tariff. Further, the power purchased by JNPT is RTC power considering the availability of power and rate, it is necessary to flatten the curve to optimise the cost. Thus, considering the present load curve of JNPT, it has proposed to continue with the existing TOD rates which meets the objective of the having load curve without much variation. Further, the present load of JNPT is very less and as it increases in coming years and stabilises, JNPT will analyse and propose necessary changes in TOD slots in next MYT Petition.



Load Curve of JNPT – Weekday of a Month from January 22 to December 22





# जवाहरलाल नेहरू पोर्ट ट्रस्ट

## JAWAHARLAL NEHRU PORT TRUST

पत्तन कार्यालय : प्रशासन भवन, शेवा, नवी मुंबई - 400 707. Post Office : Administration Bldg., Sheva, Navi Mumbai - 400 707.  
मुख्य सतर्कता अधिकारी Chief Vigilance Officer-(022) 2724 2292; मुख्य प्रबंधक (प्रशासन) एवं सचिव Chief Manager (Admn.) & Secy-(022) 2724 2233;  
मुख्य प्रबंधक (यातायात) Chife Manager (Traffic)-(022) 2724 2377; मुख्य प्रबंधक (यां. एव वि.अ.) Chief Manager (M&EE)-(022) 2724 2218;  
मुख्य प्रबंधक (वित्त) Chief Manager (Fin)-(022) 2724 2241; मुख्य प्रबंधक (प. यो. वि.) Chief Manager (PP&D) - (022) 2724 2326;  
उप-संरक्षक Dy. Conservator (022) 2724 2301; हार्वर मास्टर Harbour Master - (022) 2724 4173.  
Website : www.jnport.gov.in E-mail : info@jnport.gov.in

Ref No: JNPT/MERC/MTR/003

03 January, 2023

**The Secretary,**  
**Maharashtra Electricity Regulatory Commission,**  
13th Floor, Centre No. 1, World Trade Centre,  
Cuffe Parade,  
Mumbai 400 005

Dear Sir,

**Sub:** Reply to Data gaps – Set 2 and balance query of Set 1 and Set 2 in relation to MTR Petition filed by JNPT

**Ref:** Email dated 9 December 2022, 10 December 2022 and 24 December 2022

The Hon'ble Commission vide its email dated 9 December 2022, 10 December 2022 and 24 December 2022 raised data gaps in relation to MTR Petition filed JNPT SEZ.

The reply to data gaps set 3 and balance pending replies to data gap Set 1 and 2 as raised by the Hon'ble Commission is enclosed herewith for kind consideration.

Thanking You,

For Jawaharlal Nehru Port Trust

*(Signature)*  
3/1/23

Authorised Signatory

**Encl:** Reply to Data gaps dated 9 December 2022, 10 December 2022 and 24 December 2022 along with Exhibits

**JNPT Reply to Post TVS Data-Gaps-Set-3**

**Petition of M/s. Jawaharlal Nehru Port Trust (JNPT) for approval of Truing-up of FY 2021-22, Provisional Truing-up of FY 2022-23 and Aggregate Revenue Requirement (ARR) and Tariff for the Multi-Year Tariff period for FY 2023-24 and FY 2024-25 for its Distribution Business in accordance with Regulation 5.1 (b) of the Maharashtra Electricity Regulatory Commission (Multi Year Tariff) Regulations, 2019.**

Sr. No	Reference to the Petition	Description/Query	Reply
1.	O&M Expenses MYT Formats - "Others"	Petitioner has not considered the 'efficiency factor' on the escalation factor derived for estimating the O&M expenses for FY 2023-24 and FY 2024-25. In this context Petitioner is required to provide justification for not considering the same.	<p>JNPT submits that the MYT Regulations, 2019 specify that the escalation factor has to be reduced by an efficiency factor of 1%, unless there is an increase in the number of consumers including Open Access consumers connected to the Distribution Wires of at least 2 percent annually over the last 3 years. JNPT being an SEZ has laid its entire network and the same is readily available to the consumers like plug and play model. JNPT is required to maintain the said entire network.</p> <p>Hence, the Petitioner respectfully submits that the escalation factor should not be reduced by the efficiency factor of 1% and requests the Hon'ble Commission to consider the escalation factor based on the composite WPI:CPI index. The Hon'ble Commission is requested to exercise its powers to relax under the MYT Regulations, 2019 and not consider the efficiency factor, while computing the escalation factor, in view of the peculiar circumstances of SEZ.</p>
2.	O&M Expenses	The Petitioner has claimed the Employee Expenses and A&G Expenses as per some benchmarked norms i.e., 30 Paisa/kWh and 10 Paisa/kWh, respectively. Whereas for R&M expenses the	JNPT submits that though the R&M Contract includes activities of billing/operations there are employees of JNPT who are involved in supervision, monitoring of activities of the Contractor, Regulatory

Sr. No	Reference to the Petition	Description/Query	Reply
		<p>Petitioner has adopted a different approach wherein it is claiming actual incurred expenses in proportion to the loading. In this context, Petitioner is required to justify the following:</p> <ol style="list-style-type: none"> <li>With regards to Employee Expenses, the Petitioner under para. 3.78. of its Original Petition has submitted that, under the prevailing R&amp;M contract, the vendors are also responsible for billing and operations of the entire license area along with the R&amp;M activities. Since, the administration and operations related activities are being executed by the appointed vendors, some part of the A&amp;G activity related to billing and operations is covered under the same contract. Thus, the vendors appointed by JNPT are carrying out R&amp;M activity some part of A&amp;G activity + some part of employee activity (which is now outsourced). However, JNPT SEZ is fully allocating the cost towards the contract towards R&amp;M expenses only.</li> <li>Thus, the current approach of Petitioner for claiming O&amp;M expenses is non uniform as R&amp;M expenses are claimed based on contracts with external agencies while employee expenses and A&amp;G expenses are claimed based on benchmarked norms. Thus, Petitioner is required to provide justifications for the above highlighted observations. In addition, Petitioner should also separate out the A&amp;G related expenses (both a</li> </ol>	<p>Compliance, Power Purchase, accounts related activities etc. Thus, there are certain costs which are incurred by JNPT in addition to the contract given for R&amp;M. Further, it is submitted that since there was R&amp;M contract awarded to Virtuous Energy through competitive bidding, it has been claimed in proportion to the load and not at actuals to minimise the impact on tariff of consumers.</p> <p>JNPT further submits that allocated employee expenses and A&amp;G Expenses are already considered in the audited allocation statement. Allocation Statement submitted as Annexure '3' to the Petition in Note 22-Employee Benefit Expenses (Pg 82 of the Petition) and Note 25 – Other Expenses (Pg 83 of the Petition) specify that the allocation of the Employee Expenses and part of A&amp;G expense has been considered at 30 paise/unit and 10 paise/unit respectively.</p> <p>JNPT submits that there are no dedicated employees working for JNPT-SEZ. The existing employees of JNPT are also handling the work of SEZ. JNPT has submitted detailed explanation in respect of O&amp;M expense claimed in reply to Query 14 of Data gaps Set 1.</p>

Sr. No	Reference to the Petition	Description/Query	Reply				
		<p>corporate level and outsourced to the vendor) and employee expenses (both at corporate level and outsourced to the vendor).</p> <p>c. It is observed that the Petitioner has allocated employee expenses and A&amp;G Expenses from its main port business and considered some benchmarked numbers for such allocation. JNPT to confirm whether such allocation methodology has been audited by statutory auditor.</p> <p>d. It is also observed that as per the regulatory principles, the actual cost incurred for the employee expenses and A&amp;G expenses are required to be claimed for truing up years and only the common portion of these costs are to be allocated from the main business to licensed business. Hence, JNPT to provide the employee expenses and A&amp;G expenses in the following format (same information to be given to A&amp; G expenses also):</p> <table border="1" data-bbox="454 1121 1200 1428"> <tr> <td data-bbox="454 1121 651 1428">Actual employee expenses incurred by JNPT Licensed business for</td><td data-bbox="651 1121 848 1428">Employee expenses common between JNPT Licensed business and</td><td data-bbox="848 1121 1046 1428">Percentage of allocation between main business to licensed business</td><td data-bbox="1046 1121 1200 1428">Basis for such percentage allocation of common portion of</td></tr> </table>	Actual employee expenses incurred by JNPT Licensed business for	Employee expenses common between JNPT Licensed business and	Percentage of allocation between main business to licensed business	Basis for such percentage allocation of common portion of	
Actual employee expenses incurred by JNPT Licensed business for	Employee expenses common between JNPT Licensed business and	Percentage of allocation between main business to licensed business	Basis for such percentage allocation of common portion of				

Sr. No	Reference to the Petition	Description/Query				Reply												
		licensed business operations	its main Port business		expenses													
3.	Reply to Data Gaps Set I - Query 6	<div><div><div><div><div>Petitioner has submitted the following assets bifurcation:</div><table><thead><tr><th>Particulars of Capex</th><th>Amount in Rs</th></tr></thead><tbody><tr><td>Capitalisation as per Allocation Statement</td><td>1,17,11,41,936</td></tr><tr><td>Less: Capitalisation not claimed related to Street Light</td><td>12,85,20,000</td></tr><tr><td>Capitalisation claimed in MTR Petition - Put to Use</td><td>1,04,26,21,936</td></tr><tr><td>CWIP as per Allocation Statement</td><td>9,68,39,521</td></tr><tr><td>Total CAPEX claimed in MTR</td><td>1,13,94,61,457</td></tr></tbody></table></div><div><p>The Petitioner has deducted the Capitalisation of Rs. 12.85 Crore booked against Street Lights. In this context, Petitioner should clarify whether, such capitalisation is completely forgone and will not be claimed by the Petitioner in the ensuing years. Further, Petitioner should also clarify whether the cost of streetlights installed in the JNPT SEZ License are included within this forgone cost of Rs. 12.85 Crore or the same is capitalised separately under different asset heads.</p></div></div></div></div>				Particulars of Capex	Amount in Rs	Capitalisation as per Allocation Statement	1,17,11,41,936	Less: Capitalisation not claimed related to Street Light	12,85,20,000	Capitalisation claimed in MTR Petition - Put to Use	1,04,26,21,936	CWIP as per Allocation Statement	9,68,39,521	Total CAPEX claimed in MTR	1,13,94,61,457	The Petitioner clarifies that the capitalisation in respect of Street Lights in JNPT is completely foregone and will not be claimed in the ensuing years and nor same is claimed/capitalised under different asset heads.
Particulars of Capex	Amount in Rs																	
Capitalisation as per Allocation Statement	1,17,11,41,936																	
Less: Capitalisation not claimed related to Street Light	12,85,20,000																	
Capitalisation claimed in MTR Petition - Put to Use	1,04,26,21,936																	
CWIP as per Allocation Statement	9,68,39,521																	
Total CAPEX claimed in MTR	1,13,94,61,457																	
4.	Reply to data gaps set 1 query no. 10 (c)	The Petitioner has requested the Commission to allow carry forward of RPO shortfall for FY 2021-22 and FY 2022-23 to FY 2023-24. FY 2022-23 is yet to complete. The Petitioner has projected solar RPO shortfall of 0.08 MU and non-solar RPO				The Petitioner has considered REC Purchase for the entire Control Period from FY 2021-22 to FY 2024-25 and has made necessary changes in the revised Petition. Further, there is no carry forward of RPO shortfall from FY 2022-23.												

Sr. No	Reference to the Petition	Description/Query	Reply
		shortfall of 0.12 MU even though Petitioner has made REC purchases in FY 2022-23. The Petitioner can very well meet any shortfall in RPO through REC purchases so the requirement of carry forward of RPO shortfall for FY 2022-23 may not arise. The Petitioner is required to consider this while making revised submissions.	
5.	Reply to data gaps set 1 query no. 13	Petitioner in its reply has not specifically mentioned that it would not claim in future, the amount of O&M expenses it would forgo while claiming them in proportion to the load. The Petitioner shall mention the same in the revised petition.	The Petitioner submits that it will forego the balance amount of O&M expense while claiming them in proportion to the load
6.	Reply to data gaps set 1 query no. 14 (d)	In the reply the Petitioner has stated " <i>JNPT would like to submit that as stated in the query that there is no actual outflow currently towards such expenses is incorrect as such expenses are incurred for the distribution business but by JNPA and then allocated to JNPT based on the principles as specified in the Allocation statement.</i> " Please submit the principles used in the Allocation statement (which we believe is the Divisional Accounts of JNPT-SEZ Distribution Licensee) used to allocate the JNPA expenses to the JNPT SEZ regulated distribution business.	The Petitioner submits that audited allocation statement submitted by JNPT clearly specifies the Employee Expense at 30p/unit and A&G expense at 10p/unit.
7.	Reply to data gaps set 1 query no. 14 (f)	Is JNPT SEZ planning make investments in 'Contribution to contingency reserves' in FY 2022-23? If yes, please factor the same in the revised draft of the petition. If no, please mention the same specifically.	JNPT submits that investment to made in FY 2022-23 is related to provisions undertaken in FY 2021-22. Since the operation has been commenced in FY 2021-22, the opening GFA is zero and in line with Regulation, no provision has been claimed for FY 2021-22 and hence no subsequent investment has been made in FY 2022-23

Sr. No	Reference to the Petition	Description/Query	Reply																																																								
8.	Reply to data gaps set 1 query no. 12 & discussion during TVS	<ul style="list-style-type: none"> <li>The Petitioner has submitted transformer details and element wise no load loss levels. The Petitioner is required to give calculation regarding actual no-load losses for FY 2021-22 and FY 2022-23. Further, the Petitioner has stated that it optimised the operations of the network by switching off equipment's based on demand resulting in likely lower losses in FY 2022-23 than in FY 2021-22. Thus, Petitioner is required to provide details of optimisation of the equipment and isolate the no-load losses pertaining to the switched off equipment to justify the high values of distribution losses in FY 2020-21 and FY 2021-22.</li> <li>For FY 2023-24 and FY 2025-26 the Petitioner has proposed reduction of only 0.5% each year, the Petitioner is required to revisit this assumption in light of the possibility to further optimise the network optimisation and propose better estimate of proposed reduction in distribution loss levels.</li> <li>Petitioner under Exhibit D has submitted the Transformer wise loading; however, the Petitioner is required to submit the comparison of the losses for the Transformers loaded during FY 2021-22 vis-à-vis losses in case the Transmission is running on full load capacity. Further, provide the break-up of the total distribution losses claimed for the respective year in terms of No-Load Losses and other technical and commercial losses.</li> </ul>	<p>The computation of no load losses for FY 2021-22 is as given below:</p> <table border="1"> <thead> <tr> <th>Transformer</th><th>Nos</th><th>No Load Loss in Watts</th><th>Total No Load Losss</th></tr> </thead> <tbody> <tr> <td>50MVA</td><td>2</td><td>22064</td><td>44128</td></tr> <tr> <td>8 MVA</td><td>8</td><td>6700</td><td>53600</td></tr> <tr> <td>500KVA</td><td>1</td><td>643</td><td>643</td></tr> <tr> <td>100KVA</td><td>2</td><td>202.84</td><td>405.68</td></tr> <tr> <td colspan="3">Total No Load Loss</td><td>98776.68</td></tr> <tr> <td colspan="3">Total No of Hours during 2021-22</td><td>5088</td></tr> <tr> <td colspan="3">Total Energy lost due to no load loss (KWH)</td><td>502576</td></tr> <tr> <td colspan="3">Input units in FY 2021-22 (Sep21 to Mar22)</td><td>1438226</td></tr> <tr> <td colspan="3">Billed units in FY 2021-22 (Sep21 to Mar22)</td><td>907162</td></tr> <tr> <td colspan="3">Loss</td><td>531064</td></tr> <tr> <td colspan="3">Loss in %</td><td>36.92</td></tr> <tr> <td colspan="3">Adjusting loss considering no load loss</td><td>28489</td></tr> <tr> <td colspan="3">Loss in % after adjustment of No load loss</td><td>1.98</td></tr> </tbody> </table> <p>The Petitioner submits that it has now optimised the no load losses by switching off the transformers (mainly 1*50 MVA and few 8 MVA transformers) considering the very low load of ~1 MW. Further, it will be endeavour of JNPT to reconfigure the network so that further transformers will be switched off in such a manner that there is adequate backup in case on any failure and the consumers continue to receive uninterrupted power supply. It is further</p>	Transformer	Nos	No Load Loss in Watts	Total No Load Losss	50MVA	2	22064	44128	8 MVA	8	6700	53600	500KVA	1	643	643	100KVA	2	202.84	405.68	Total No Load Loss			98776.68	Total No of Hours during 2021-22			5088	Total Energy lost due to no load loss (KWH)			502576	Input units in FY 2021-22 (Sep21 to Mar22)			1438226	Billed units in FY 2021-22 (Sep21 to Mar22)			907162	Loss			531064	Loss in %			36.92	Adjusting loss considering no load loss			28489	Loss in % after adjustment of No load loss			1.98
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Sr. No	Reference to the Petition	Description/Query	Reply
			submitted that since the load projected for future years is around 2 to 2.5 MW, the no load losses will continue to remain and it would be not be possible to theoretically asses the scenario going forward. Accordingly, we request the Hon'ble Commission to consider the loss reduction trajectory of 0.5% for FY 2023-24 and FY 2024-25.
9.	Reply to data gaps set 1 query no. 26	<ul style="list-style-type: none"> <li>In light of the discussions held during the TVS, Petitioner shall revisit the 'Schedule of Charges' to incorporate the same in the revised Petition.</li> </ul>	The revised schedule of charges will be incorporated in the revised Petition.
10.	Power Purchase Rate	<ul style="list-style-type: none"> <li>In light of the discussions held during the TVS, Petitioner shall study the prevailing power purchase rates for procuring power through various sources, the future outlook to propose power purchase rate for procurement of power from various sources in the future years. The power purchase rate shall be backed up with proper justification and basis.</li> </ul>	The justification for considering short term rate will be incorporated in the revised Petition.
11.	Para. 3.7.6 of the Petition	<ul style="list-style-type: none"> <li>The Petitioner has stated " <i>However, JNPT, based on the Employee and A&amp;G expense approved by the Hon'ble Commission for other SEZs in the State have considered the benchmark such as for the Employee Expense - 30 paise/unit and A&amp;G expense - 10 paise/unit for FY 2021-22.</i>" The Petitioner is required to submit the benchmarking analysis it has undertaken to arrive at the values of 30 paise/ unit and 10 paise/ unit for employee expenses and A&amp;G expenses for FY 2021-22.</li> </ul>	The reply to the said query is already submitted as a part of reply to Datagaps Set 1 and query 2 herein above.
12.	TVS inputs	JNPT SEZ has stated that it has incurred higher expenses for	JNPT submits that amount forgone towards O&M expense will not

Sr. No	Reference to the Petition	Description/Query	Reply
		various components of ARR however, it is claiming expenses only in proportion to the load. JNPT is required to provide the details of amount of ARR it is foregoing in the interest of the consumers and keeping the tariffs competitive. Further, JNPT SEZ is required to mention clearly in the Petition that it would forego such amount and not claim the same in the future.	be claimed in future. Also, Capex is being claimed in proportion to the load of JNPT and any additional amount of capex approved but not claimed (in proportion to the load) will not be claimed in future

Reply to Balance Data gaps Set 1 and Set 2

**Petition of M/s. Jawaharlal Nehru Port Trust (JNPT) for approval of Truing-up of FY 2021-22, Provisional Truing-up of FY 2022-23 and Aggregate Revenue Requirement (ARR) and Tariff for the Multi-Year Tariff period for FY 2023-24 and FY 2024-25 for its Distribution Business in accordance with Regulation 5.1 (b) of the Maharashtra Electricity Regulatory Commission (Multi Year Tariff) Regulations, 2019.**

Sr. No	Reference to the Petition	Description/Query	JNPT Reply
<b>Executive Summary and MYT Petition</b>			
a.	Interest on Long Term Loan (Para. 3.11.3)	Petitioner to submit the weighted average Interest Rate Certificate of 3.28% duly certified from the Auditor for FY 2021-22 and FY 2022-23 up to H1 or latest available month.	JNPT submits that it has inadvertently considered interest rate of 3.28%. However, based on the certified Auditor certificate, the interest rate is 4.47% and the same is being considered in the revised Petition. The Copy of the certificate is annexed hereto and marked as <b>Exhibit 'A'</b> .
b.	Return on Equity (Para. 3.13.5)	<p>a. Petitioner to submit the computation of arriving at the <b>wire's availability of 99.80%</b> as per the formula provided under Regulation 29.8 of the MERC MYT Regulations, 2019. Further, the Petitioner to also provide the SAIDI recorded for FY 2021-22 duly certified by the Auditor.</p> <p>b. Petitioner to submit the auditor certificate for certifying its <b>collection efficiency of 99.50%</b> for FY 2020-21 with respect to Revenue billed to its consumers vis-à-vis Revenue booked during FY 2021-22 as per the Allocated Statement submitted as part of the present</p>	<p>a. On perusal of the SOP Compliance reports submitted to the Hon'ble Commission, JNPT submits that there is no interruption to consumers in FY 2021-22. Accordingly, the Wires Availability is 100% and it was inadvertently considered as 99.80% in the Petition. The same will be corrected in the revised Petition. SOP Compliance Reports are annexed hereto and marked as <b>Exhibit 'B'</b>.</p> <p>b. It is submitted that JNPT commenced its operations in August 2021 and FY 2021-22 is first year of commencement of operations. Accordingly, the</p>

Sr. No	Reference to the Petition	Description/Query	JNPT Reply
		Petition.	collection of billing done during the month March 22 is in the month of April 22. JNPT has considered the said collection in FY 2021-22 for computing Collection Efficiency. During the normal course of operations, there would be overlap of collection in the month of April which would not have any impact. Considering the 1 <sup>st</sup> year of operation, JNPT requests the Hon'ble Commission to consider the Collection Efficiency 99.50% for FY 2021-22. The Copy of the certificate is annexed hereto and marked as <b>Exhibit 'C'</b> .





**JAGADISH LAXMAN SATE & CO.**  
**CHARTERED ACCOUNTANTS**

Office : 63, At- Village - Bhatan,  
Post - Somatne, Taluka - Panvel,  
Dist - Raigad - 410 206.

**TO WHOMSOEVER IT MAY CONCERN**

We have verified the Books of Accounts and relevant records produced before us of **M/S JAWAHARLAL NEHRU PORT AUTHORITY** & Registered office at Administration Building, Sheva, Navi Mumbai-400 707. According to the information and explanation provided to us we hereby certify that the above mentioned entity has borrowed amount through External Commercial Borrowings.

Rate of Interest of ECB is calculated as follows.

Particulars	Amount	Amount
Total Interest Paid During FY 21-22 (A)	42,76,50,791	
Total Interest Rate Swap Charges Paid During FY 21-22(B)	52,04,76,758	
<b>Total : (C=A+B)</b>		<b>94,81,27,549</b>
Principle Outstanding Amount at 31.03.22(D)	19,66,75,05,000	
Principle Outstanding Amount at 31.03.21(E)	22,79,20,00,000	
<b>Average Principle Amount {F=(D+E)/2}</b>		<b>21,22,97,52,500</b>
<b>Interest Rate Calculated (G= C/F*100)</b>		<b>4.47 %</b>

**Note :-** As per Agreement executed by and between JNPA and its lenders for \$400 Million Rate of Interest is Libor plus spread. Actual Interest as per the amount paid for FY 2021-22 comes to 4.47%.

This certificate is being issued at the request of the JNPA to be submitted to MERC and should not be used for any other purpose or to be distributed to any other parties. Accordingly, we do not accept or assume any liability or any duty of care for any other party to whom it is shown or into whose hands it may come without our prior consent in writing.

For Jagadish Laxman Sate & Co.

Chartered Accountants

Firm Regn.No. 146905W

CA Jagadish Sate

M. No. 182935



Date : 20/12/2022

Place : Panvel

UDIN : 22182935BFTWUC1119





# जवाहरलाल नेहरू पोर्ट ट्रस्ट

## JAWAHARLAL NEHRU PORT TRUST

124 9001 : 2015  
ISO 14001:2015  
ISO 45001:2018  
ISO 27001:2013

पत्तन कार्यालय : प्रशासन भवन, शेवा, नवी मुंबई - 400 707. Post Office : Administration Bldg., Sheva, Navi Mumbai - 400 707.  
मुख्य सतर्कता अधिकारी Chief Vigilance Officer-(022) 2724 2292; मुख्य प्रबंधक (प्रशासन) एवं सचिव Chief Manager (Admn.) & Secy-(022) 2724 2233;  
मुख्य प्रबंधक (यातायात) Chife Manager (Traffic)-(022) 2724 2377; मुख्य प्रबंधक (वां. एवं वि.अ.) Chief Manager (M&EE)-(022) 2724 2218;  
मुख्य प्रबंधक (वित्त) Chief Manager (Fin)-(022) 2724 2241; मुख्य प्रबंधक (प.यो.वि.) Chief Manager (PP&D) - (022) 2724 2326;  
उप-संरक्षक Dy. Conservator (022) 2724 2301; हार्वर मास्टर Harbour Master - (022) 2724 4173.  
Website : www.jnport.gov.in E-mail : info@jnport.gov.in

JNP/M&EE/US-SEZ/MERC/2022

June 8, 2022

To  
The Secretary,  
Maharashtra Electricity Regulatory Commission  
Mumbai.

**Subject: Standard of Performance Quarterly Return Sep 2021, Dec 2021, & Mar 2022**

Respected Sir,

Maharashtra Electricity Regulatory Commission after following due regulatory process taken on record the status of Jawaharlal Nehru Port Trust Sez (JNPT SEZ) as deemed distribution licensee under Section 14(b) of EA2003, in its order in case 47 of 2018 dated 14/06/2018. Further Hon. Commission has notified in official gazette the Maharashtra Electricity Regulatory Commission (Specific Conditions of Distribution Licence applicable to Jawaharlal Nehru Port Trust for SEZ at Jawaharlal Nehru Port, Taluka-Uran, District-Raigad) Regulations, 2018 on 13/11/2018.

JNPT SEZ has commenced its operation as distribution licensee from 11-08-2021 after complying with the scope of STU and statutory requirement of MSLDC. However the consumers are added and billed in the month of Sep 2021.

In compliance to the MERC (Maharashtra Electricity Regulation Commission) Electricity Supply Code and Standards of performance of Distribution Licensee including power Quality Regulations 2021, the SOP quarterly return in the prescribed formats as given in Annexure III to VII for the quarter ending Sep 2021, Dec 2021 & Mar 2022 are attached herewith for your kind perusal.

Thanking You

Yours Faithfully,

*(Anil Chopade)*  
8/6/22

Authorised Signatory

(Anil Chopade | Manager – Utility Services)

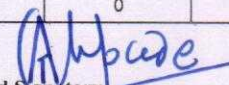
M +91 98336 72435

anilchopade@jnport.gov.in

Encl :- Annexure III to VII



JAWAHARLAL NEHRU PORT TRUST SEZ									
Annexure III- Standards of Performance Level by the Distribution Licensee									
Format for Quarterly Return Mar 2022 to be submitted to the Commission by the Distribution Licensee									
Sr No	Parameters	Area	Pending complaints nos (Previous Quarter)	Complaints in current quarter	Total Complaints	No of complaints addressed			Pending complaints at end of quarter
	A	b	c	d	e=c+d	f	g	h=f+g	i=e-h
1	Intimation of charges where supply to dedicated or after extension/ augmentation	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
2	New connection / additional load where supply from existing line	Urban	0	2	2	2	0	2	0
		Rural	0	0	0	0	0	0	0
	New connection/ additional load where supply after extension/ augmentation	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
4	New connection/ additional load where supply after commissioning of sub station	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
5	Shifting of Meter/ service line	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
6	Reconnection of supply after payment of dues	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
7	Change of Name	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
8	Change of category	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
9	Fuse of call	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
10	Break down of over head line	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
11	Underground cable fault/ Bus riser fault	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
12	Transformer & associated switchgear failure	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
13	Metre Reading	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
14	Replacement of faulty metrs	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
15	Replacement of burnt meter	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
16	Billing complaint	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
17	Quality of supply (specify the parameter)	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0

  
 Authorised Signatory  
 (Anil Chopade | Manager – Utility Services)  
 M +91 98336 7243  
 anilchopade@jnport.gov.in



ज.ने.प.न्यास  
JNPT

अनिल टी. चोपडे / ANIL T. CHOPDE  
 प्रबंधक ( उपयोगिता सेवाएँ )  
 MANAGER (UTILITY SERVICES)  
 ज.ने.प.न्यास, शेवा, नवी मुंबई 400707  
 J.N.P.T., Sheva, Navi Mumbai 400707



# JAWAHARLAL NEHRU PORT TRUST SEZ

## Annexure-IV-Report of individual Complaints where Compensation has been paid

Format for quarterly return Mar-2022 to be submitted to the Commission by the Distribution Licensee

Sr. No.	Complaint No	Date of Filing complaint/ automatic compensation	Consumer No.	Name and address of consumer	Nature of complaint	Reference standard of performance	Amount of compensation (Rs)	Date of payment of payment of compensation (DD/MM/YYYY)
1	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil

Note - The report shall be prepared as per category of item for which the compensation is paid for non-observance of standard of performance

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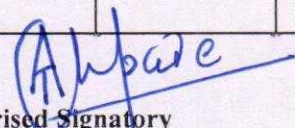
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JAWAHARLAL NEHRU PORT TRUST SEZ							
Annexure-V- Report of action on Faulty Meters (1 Phase/ 3 Phase).							
Format for quarterly return Mar 2022 to be submitted to the Commission by the Distribution Licensee							
Sr No	Name of Distribution Licensee	Reference to overall standard	Faulty Meter at start of the quarter (Nos)	Faulty Meter added during the quarter (Nos)	Total Faulty meters (Nos)	Meter rectified/ replaced (Nos)	Faulty Meters pending at end of quarter (Nos)
[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]
1	JNPT SEZ	Nil	0	0	0	0	0



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## JAWAHARLAL NEHRU PORT TRUST SEZ

## Annexure-VI-Report of Installation of Meter

Format for quarterly return Mar 2022 to be submitted to the Commission by the Distribution Licensee

Sr No	Name of Distribution Licensee	Total Agriculture connections at start of the quarter (Nos)	Metered Agriculture connection at start of the quarter (Nos)	New Meter Agriculture connections released during the quarter (Nos)	Unmetered agriculture connections at start if the quarter (Nos)	New Unmetered agriculture connection released during the quarter (Nos)	Meter installed to unmetered connections during the quarter (Nos)	Unmetered agriculture connections at start of the quarter (Nos)	New Unmetered agriculture connections released during the quarter (Nos)	Meter installed to unmetered connection during the quarter (Nos)
[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9=6+7+8]	[10=4+5+8]	[9+10]
1	JNPT SEZ	0	0	0	0	0	0	0	0	0

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**JAWAHARLAL NEHRU PORT TRUST SEZ**

Annexure-VII- Performance Report regarding Reliability Indices.

Formats for Quarterly returns Mar 2022 to be submitted to the Commission by the Distribution Licensee

**1) System Average Interruption Duration Index (SAIDI)**

Sr No	Month	Ni=Number of Consumers Who experienced a sustained interruption on ith feeder.	Ri=Restoration time for each interruption event on ith feeder	Nt=Total number of consumers of the distribution Licensees area.	Sum.(Ri*Ni) for all feeders excluding agriculture feeders	SAIDI=(6)/(5)
[1]	[2]	[3]	[4]	[5]	[6]	[7]
1	Oct-21	0	0	13	0	0
2	Nov-21	0	0	13	0	0
3	Dec-21	0	0	13	0	0
	<b>Total</b>	<b>0</b>	<b>0</b>	<b>13</b>	<b>0</b>	<b>0</b>

**2) System Average Interruption Frequency Index(SAIFI)**

Sr No	Month	Ni=Number of Consumers Who experienced a sustained interruption on ith feeder.	Sum of Consumers of i feeders which had experienced interruptions =Sum Ni	Nt=Total number of consumers of the distribution Licensees area.	SAIFI=(4)/(5)
[1]	[2]	[3]	[4]	[5]	[6]
1	Oct-21	0	0	13	0.000
2	Nov-21	0	0	13	0.000
3	Dec-21	0	0	13	0.000
	<b>Total</b>	<b>0</b>	<b>0</b>	<b>13</b>	<b>0.000</b>

**3) Customer Average Interruption Duration Index (CAIDI)**

Sr No	Month	SAIDI	SAIFI	SAIDI/SAIFI
[1]	[2]	[3]	[4]	[5]
1	Oct-21	0	0.000	0
2	Nov-21	0	0.000	0
3	Dec-21	0	0.00	0
	<b>Total</b>	<b>0</b>	<b>0.00</b>	<b>0</b>

**4) customer Average Interruption Duration Index (CAIDI) for HT consumers**

Sr No	Month	Ni=Number of HT consumers who experienced a sustained interruption	Ri=Restoration time for each interruption event on HT feeder	sum.(Ri*Ni) for all HT consumers	CAIDI=(5)/(3)
[1]	[2]	[3]	[4]	[5]	[6]
1	Oct-21	0	0	0	0
2	Nov-21	0	0	0	0
3	Dec-21	0	0	0	0
	<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

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## JAWAHARLAL NEHRU PORT TRUST SEZ

Annexure III- Standards of Performance Level by the Distribution Licensee

Format for Quarterly Return Sep 2021 to be submitted to the Commission by the Distribution Licensee

Sr No	Parameters	Area	Pending complaints nos (Previous Quarter)	Complaints in current quarter	Total Complaints	No of complaints addressed			Pending complaints at end of quarter
	A	b	c	d	e=c+d	f	g	h=f+g	i=e-h
1	Intimation of charges where supply to dedicated or after extension/ augmentation	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
2	New connection / additional load where supply from existing line	Urban	0	7	7	7	0	7	0
		Rural	0	0	0	0	0	0	0
	New connection/ additional load where supply after extension/ augmentation	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
4	New connection/ additional load where supply after commissioning of sub station	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
5	Shifting of Meter/ service line	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
6	Reconnection of supply after payment of dues	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
7	Change of Name	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
8	Change of category	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
9	Fuse of call	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
10	Break down of over head line	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
11	Underground cable fault/ Bus riser fault	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
12	Transformer & associated switchgear failure	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
13	Metre Reading	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
14	Replacement of faulty metrs	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
15	Replacement of burnt meter	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
16	Billing complaint	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
17	Quality of supply (specify the parameter)	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0

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# JAWAHARLAL NEHRU PORT TRUST SEZ

Annexure-IV-Report of individual Complaints where Compensation has been paid

Format for quarterly return Sep-2021 to be submitted to the Commission by the Distribution Licensee

Sr. No.	Complaint No	Date of Filing complaint/ automatic compensation	Consumer No.	Name and address of consumer	Nature of complaint	Reference standard of performance	Amount of compensation (Rs)	Date of payment of payment of compensation (DD/MM/YYYY)
1	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil

Note - The report shall be prepared as per category of item for which the compensation is paid for non-observance of standard of performance

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# JAWAHARLAL NEHRU PORT TRUST SEZ

Annexure-V- Report of action on Faulty Meters (1 Phase/ 3 Phase).

Format for quarterly return Sep 2021 to be submitted to the Commission by the Distribution Licensee

Sr No	Name of Distribution Licensee	Reference to overall standard	Faulty Meter at start of the quarter (Nos)	Faulty Meter added during the quarter (Nos)	Total Faulty meters (Nos)	Meter rectified/ replaced (Nos)	Faulty Meters pending at end of quarter (Nos)
[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]
1	JNPT SEZ	Nil	0	0	0	0	0

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## JAWAHARLAL NEHRU PORT TRUST SEZ

## Annexure-VI-Report of Installation of Meter

Format for quarterly return Sep 2021 to be submitted to the Commission by the Distribution Licensee

Sr No	Name of Distribution Licensee	Total Agriculture connections at start of the quarter (Nos)	Metered Agriculture connection at start of the quarter (Nos)	New Meter Agriculture connections released during the quarter (Nos)	Unmetered agriculture connections at start if the quarter (Nos)	New Unmetered agriculture connection released during the quarter (Nos)	Meter installed to unmetered connections during the quarter (Nos)	Unmetered agriculture connections at start of the quarter (Nos)	New Unmetered agriculture connections released during the quarter (Nos)	Meter installed to unmetered connection during the quarter (Nos)
[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9=6+7+8]	[10=4+5+8]	[9+10]
1	JNPT SEZ	0	0	0	0	0	0	0	0	0

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**JAWAHARLAL NEHRU PORT TRUST SEZ**

Annexure-VII- Performance Report regarding Reliability Indices.

Formats for Quarterly returns Sep 2021 to be submitted to the Commission by the Distribution Licensee

**1) System Average Interruption Duration Index (SAIDI)**

Sr No	Month	Ni=Number of Consumers Who experienced a sustained interruption on ith feeder.	Ri=Restoration time for each interruption event on ith feeder	Nt=Total number of consumers of the distribution Licensees area.	Sum.(Ri*Ni) for all feeders excluding agriculture feeders	SAIDI=(6)/(5)
[1]	[2]	[3]	[4]	[5]	[6]	[7]
1	Jul-21	NA	NA	NA	NA	NA
2	Aug-21	NA	NA	NA	NA	NA
3	Sep-21	0	0	7	0	0
	<b>Total</b>	<b>0</b>	<b>0</b>	<b>7</b>	<b>0</b>	<b>0</b>

**2) System Average Interruption Frequency Index(SAIFI)**

Sr No	Month	Ni=Number of Consumers Who experienced a sustained interruption on ith feeder.	Sum of Consumers of i feeders which had experienced interruptions =Sum Ni	Nt=Total number of consumers of the distribution Licensees area.	SAIFI=(4)/(5)
[1]	[2]	[3]	[4]	[5]	[6]
1	Jul-21	NA	NA	NA	NA
2	Aug-21	NA	NA	NA	NA
3	Sep-21	0	0	7	0.000
	<b>Total</b>		<b>0</b>	<b>7</b>	<b>0.000</b>

**3) Customer Average Interruption Duration Index (CAIDI)**

Sr No	Month	SAIDI	SAIFI	SAIDI/SAIFI
[1]	[2]	[3]	[4]	[5]
1	Jul-21	NA	NA	NA
2	Aug-21	NA	NA	NA
3	Sep-21	0	0.00	0
	<b>Total</b>	<b>0</b>	<b>0.00</b>	<b>0</b>

**4) customer Average Interruption Duration Index (CAIDI) for HT consumers**

Sr No	Month	Ni=Number of HT consumers who experienced a sustained interruption	Ri=Restoration time for each interruption event on HT feeder	sum.(Ri*Ni) for all HT consumers	CAIDI=(5)/(3)
[1]	[2]	[3]	[4]	[5]	[6]
1	Jul-21	NA	NA	NA	NA
2	Aug-21	NA	NA	NA	NA
3	Sep-21	0	0	0	0
	<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

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## JAWAHARLAL NEHRU PORT TRUST SEZ

Annexure III- Standards of Performance Level by the Distribution Licensee

Format for Quarterly Return Dec 2021 to be submitted to the Commission by the Distribution Licensee

Sr No	Parameters	Area	Pending complaints nos (Previous Quarter)	Complaints in current quarter	Total Complaints	No of complaints addressed			Pending complaints at end of quarter
	A	b	c	d	e=c+d	f	g	h=f+g	i=e-h
1	Intimation of charges where supply to dedicated or after extension/ augmentation	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
2	New connection / additional load where supply from existing line	Urban	0	4	4	4	0	4	0
		Rural	0	0	0	0	0	0	0
	New connection/ additional load where supply after extension/ augmentation	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
4	New connection/ additional load where supply after commissioning of sub station	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
5	Shifting of Meter/ service line	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
6	Reconnection of supply after payment of dues	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
7	Change of Name	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
8	Change of category	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
9	Fuse of call	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
10	Break down of over head line	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
11	Underground cable fault/ Bus riser fault	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
12	Transformer & associated switchgear failure	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
13	Metre Reading	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
14	Replacement of faulty metrs	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
15	Replacement of burnt meter	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
16	Billing complaint	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0
17	Quality of supply (specify the parameter)	Urban	NA	NA	NA	NA	NA	NA	NA
		Rural	0	0	0	0	0	0	0

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# JAWAHARLAL NEHRU PORT TRUST SEZ

## Annexure-IV-Report of individual Complaints where Compensation has been paid

Format for quarterly return Dec-2021 to be submitted to the Commission by the Distribution Licensee

Sr. No.	Complaint No	Date of Filing complaint/ automatic compensation	Consumer No.	Name and address of consumer	Nature of complaint	Reference standard of performance	Amount of compensation (Rs)	Date of payment of payment of compensation (DD/MM/YYYY)
1	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil

Note - The report shall be prepared as per category of item for which the compensation is paid for non-observance of standard of performance

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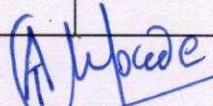
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JAWAHARLAL NEHRU PORT TRUST SEZ							
Annexure-V- Report of action on Faulty Meters (1 Phase/ 3 Phase).							
Format for quarterly return Dec 2021 to be submitted to the Commission by the Distribution Licensee							
Sr No	Name of Distribution Licensee	Reference to overall standard	Faulty Meter at start of the quarter (Nos)	Faulty Meter added during the quarter (Nos)	Total Faulty meters (Nos)	Meter rectified/ replaced (Nos)	Faulty Meters pending at end of quarter (Nos)
[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]
1	JNPT SEZ	Nil	0	0	0	0	0

  
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## JAWAHARLAL NEHRU PORT TRUST SEZ

## Annexure-VI-Report of Installation of Meter

Format for quarterly return Dec 2021 to be submitted to the Commission by the Distribution Licensee

Sr No	Name of Distribution Licensee	Total Agriculture connections at start of the quarter (Nos)	Metered Agriculture connection at start of the quarter (Nos)	New Meter Agriculture connections released during the quarter (Nos)	Unmetered agriculture connections at start if the quarter (Nos)	New Unmetered agriculture connection released during the quarter (Nos)	Meter installed to unmetered connections during the quarter (Nos)	Unmetered agriculture connections at start of the quarter (Nos)	New Unmetered agriculture connections released during the quarter (Nos)	Meter installed to unmetered connection during the quarter (Nos)
[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9=6+7+-8]	[10=4+5+8]	[9+10]
1	JNPT SEZ	0	0	0	0	0	0	0	0	0

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# JAWAHARLAL NEHRU PORT TRUST SEZ

Annexure-VII- Performance Report regarding Reliability Indices.

Formats for Quarterly returns Dec 2021 to be submitted to the Commission by the Distribution Licensee

## 1) System Average Interruption Duration Index (SAIDI)

Sr No	Month	Ni=Number of Consumers Who experienced a sustained interruption on ith feeder.	Ri=Restoration time for each interruption event on ith feeder	Nt=Total number of consumers of the distribution Licensees area.	Sum.(Ri*Ni) for all feeders excluding agriculture feeders	SAIDI=(6)/(5)
[1]	[2]	[3]	[4]	[5]	[6]	[7]
1	Oct-21	0	0	9	0	0
2	Nov-21	0	0	10	0	0
3	Dec-21	0	0	11	0	0
	<b>Total</b>	<b>0</b>	<b>0</b>	<b>11</b>	<b>0</b>	<b>0</b>

## 2) System Average Interruption Frequency Index(SAIFI)

Sr No	Month	Ni=Number of Consumers Who experienced a sustained interruption on ith feeder.	Sum of Consumers of i feeders which had experienced interruptions =Sum Ni	Nt=Total number of consumers of the distribution Licensees area.	SAIFI=(4)/(5)
[1]	[2]	[3]	[4]	[5]	[6]
1	Oct-21	0	0	9	0.000
2	Nov-21	0	0	10	0.000
3	Dec-21	0	0	11	0.000
	<b>Total</b>	<b>0</b>	<b>0</b>	<b>11</b>	<b>0.000</b>

## 3) Customer Average Interruption Duration Index (CAIDI)

Sr No	Month	SAIDI	SAIFI	SAIDI/SAIFI
[1]	[2]	[3]	[4]	[5]
1	Oct-21	0	0.000	0
2	Nov-21	0	0.000	0
3	Dec-21	0	0.00	0
	<b>Total</b>	<b>0</b>	<b>0.00</b>	<b>0</b>

## 4) customer Average Interruption Duration Index (CAIDI) for HT consumers

Sr No	Month	Ni=Number of HT consumers who experienced a sustained interruption	Ri=Restoration time for each interruption event on HT feeder	sum.(Ri*Ni) for all HT consumers	CAIDI=(5)/(3)
[1]	[2]	[3]	[4]	[5]	[6]
1	Oct-21	0	0	0	0
2	Nov-21	0	0	0	0
3	Dec-21	0	0	0	0
	<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

Authorised Signatory

(Anil Chopade | Manager – Utility Services)

M +91 98336 72431

anilchopade@jnpt.gov.in

MANAGER (UTILITY SERVICES)

ज.ने.प.न्यास  
JNPT

ज.ने.प.न्यास, शेवा, नवी मुंबई 400707  
J.N.P.T., Sheva, Navi Mumbai 400707



# JAWAHARLAL NEHRU PORT TRUST SEZ

Annexure-VII- Performance Report regarding Reliability Indices.

Formats for Quarterly returns Mar 2022 to be submitted to the Commission by the Distribution Licensee

## 1) System Average Interruption Duration Index (SAIDI)

Sr No	Month	Ni=Number of Consumers Who experienced a sustained interruption on ith feeder.	Ri=Restoration time for each interruption event on ith feeder	Nt=Total number of consumers of the distribution Licensees area.	Sum.(Ri*Ni) for all feeders excluding agriculture feeders	SAIDI=(6)/(5)
[1]	[2]	[3]	[4]	[5]	[6]	[7]
1	Jan-22	0	0	13	0	0
2	Feb-22	0	0	13	0	0
3	Mar-22	0	0	13	0	0
	<b>Total</b>	<b>0</b>	<b>0</b>	<b>13</b>	<b>0</b>	<b>0</b>

## 2) System Average Interruption Frequency Index(SAIFI)

Sr No	Month	Ni=Number of Consumers Who experienced a sustained interruption on ith feeder.	Sum of Consumers of i feeders which had experienced interruptions =Sum Ni	Nt=Total number of consumers of the distribution Licensees area.	SAIFI=(4)/(5)
[1]	[2]	[3]	[4]	[5]	[6]
1	Jan-22	0	0	13	0.000
2	Feb-22	0	0	13	0.000
3	Mar-22	0	0	13	0.000
	<b>Total</b>	<b>0</b>	<b>0</b>	<b>13</b>	<b>0.000</b>

## 3) Customer Average Interruption Duration Index (CAIDI)

Sr No	Month	SAIDI	SAIFI	SAIDI/SAIFI
[1]	[2]	[3]	[4]	[5]
1	Jan-22	0	0.000	0
2	Feb-22	0	0.000	0
3	Mar-22	0	0.00	0
	<b>Total</b>	<b>0</b>	<b>0.00</b>	<b>0</b>

## 4) customer Average Interruption Duration Index (CAIDI) for HT consumers

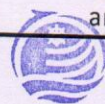
Sr No	Month	Ni=Number of HT consumers who experienced a sustained interruption	Ri=Restoration time for each interruption event on HT feeder	sum.(Ri*Ni) for all HT consumers	CAIDI=(5)/(3)
[1]	[2]	[3]	[4]	[5]	[6]
1	Jan-22	0	0	0	0
2	Feb-22	0	0	0	0
3	Mar-22	0	0	0	0
	<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

Authorised Signatory

(Anil Chopade | Manager – Utility Services)

M +91 98336 7243

anilchopade@jnpport.gov.in



प्रबंधक (उपयोगिता सेवाएं)  
MANAGER (UTILITY SERVICES)



RSJ/2022-23/035

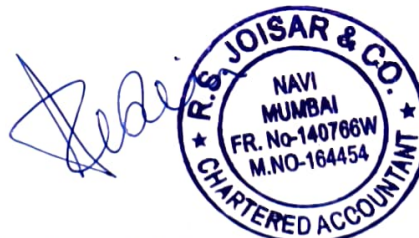
Date: - 03/01/2023

### TO WHOMSOEVER IT MAY CONCERN

1. We have examined the books of accounts and other relevant records and documents of the company as at the end of the year ended 31<sup>st</sup> March 2022, in the normal course of its business for the purpose of providing reasonable assurance on the particulars mentioned in allocation statement for distribution of power business of JNPT-SEZ.
2. We have been requested by the management of the company to provide a Certificate on the Collection efficiency for submission to Hon'ble Maharashtra Electricity Regulatory Commission (MERC), which has been prepared based on the books of accounts and other relevant records and documents of the company as at and for the year ended 31<sup>st</sup> March 2022.
3. Our responsibility, for the purpose of this certificate, is limited to certifying that the particulars contained in this statement have been extracted from the respective Distribution business maintained by the Company as at and for the year ended 31<sup>st</sup> March 2022.
4. This certificate is being issued at the request of the company to be submitted to MERC and should not be used for any other purpose or to be distributed to any other parties. Accordingly, we do not accept or assume any liability or any duty of care for any other party to whom it is shown or into whose hands it may come without our prior consent in writing.

#### Collection Efficiency for FY 2021-22

Category	FY 2021-22		
	Billing	Collection	Collection Efficiency
HT I (A)	46,67,369.16	46,79,675.00	100.26%
HT II	31,28,502.94	31,13,628.00	99.52%
LT II (A)	3,370.02	3,390.00	100.59%
LT II (B)	3,87,326.19	2,99,232.00	77.26%
LT II (C)	1,42,343.95	1,41,517.00	99.42%
LT V (ii)	11,94,398.49	11,93,810.00	99.95%
LT VII (B) (ii)	4,65,563.44	5,30,490.00	113.95%
<b>Total</b>	<b>99,88,874.19</b>	<b>99,61,742.00</b>	<b>99.73%</b>





# R S JOISAR & CO

## CHARTERED ACCOUNTANT

5. The billing amount is considered based on the energy consumed by the consumers till 31<sup>st</sup> March 2022 though the same might have been billed in April 2022 considering the method of accrual basis of accounting. Also, with respect to collection, amount collected within due-date for energy consumed in March 2022 and billed in April 2022 is considered under collection amount, so as to provide the accurate information on the collection efficiency.

Yours faithfully,

For

R.S. Joisar & Co

Chartered Accountant

CA Rohit S. Joisar

Proprietor:-

Mob No. 164454

Date: 03/01/2023

Place: Navi Mumbai





**BEFORE**  
**THE MAHARASHTRA ELECTRICITY REGULATORY COMMISSION**  
**MUMBAI**

IN THE MATTER OF

Petition of Jawaharlal Nehru Port Trust (JNPT) for approval of Truing-up of FY 2021-22, Provisional Truing-up of FY 2022-23 and Aggregate Revenue Requirement (ARR) and Tariff for the Multi-Year Tariff period for FY 2023-24 and FY 2024-25 for its Distribution Business in accordance with Regulation 5.1 (b) of the Maharashtra Electricity Regulatory Commission (Multi Year Tariff) Regulations, 2019

AND

IN THE MATTER OF

M/s. Jawaharlal Nehru Port Trust (JNPT)

Administration Building,

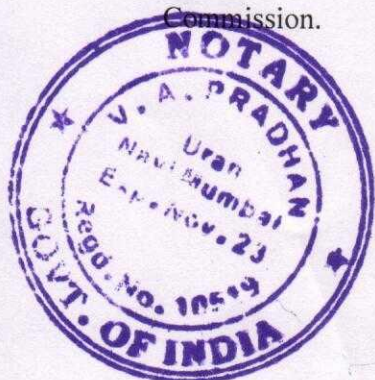
Nhava Sheva,

Uran, Navi Mumbai – 400 707

...Petitioner

I, Anil Chopade, aged 57 years, son of Shri. Tryambak Chopade having my office at Administration Building Nhava Sheva, Navi Mumbai - 400 707, do solemnly affirm and say as follows:

1. I am authorized signatory of Jawaharlal Nehru Port Trust, the applicant in the above matter and am duly authorized by the said applicant to make this affidavit.
2. The statements made in the Petition, are true to my knowledge and belief based on the information received and I believe them to be true.
3. I say that there are no proceedings pending in any court of law/tribunal or arbitrator or any other authority, wherein the Petitioners are a party and where issues arising and/or reliefs sought are identical or similar to the issues arising in the matter pending before the Hon'ble Commission.



(Anil Chopade)

03 JAN 2023

JP



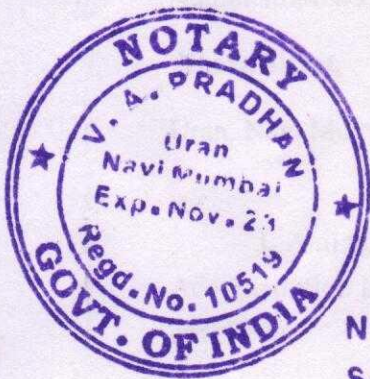
I solemnly affirm at JNPT, Navi Mumbai on this 03<sup>rd</sup> day of January, 2023 that the contents of the above affidavit are true to my knowledge, no part of it is false and nothing material has been concealed there from.

Identified before me

Petitioner

*Anupade*

 अनिल टी. चोपडे / ANIL T. CHOPDE  
प्रबंधक (उपयोगिता सेवाएँ)  
MANAGER (UTILITY SERVICES)  
ज.ने.प.न्यास, शेवा, नवी मुंबई 400707  
J.N.P.T., Sheva, Navi Mumbai 400707



NOTARIAL REGISTER

Serial No. 33 Date 03 JAN 2023

2023



BEFORE ME

*Vaishali A. Pradhan*

3.1.2023

**Mrs. VAISHALI A. PRADHAN**

M. SC., LL.B.

ADVOCATE & NOTARY PUBLIC (Govt. Of India)

Uran Navi Mumbai  
Reg. No. 10519

