I.A.No. 12 of 2019 in OP.No. 60 of 2017

BEFORE THE HONOURABLE ANDHRA PRADESH ELECTRICITY REGULATORY COMMISSION

At its office at 4th Floor, Singareni Bhavan, Red Hills, Hyderabad-500 004

File No.

/2019

Case No.

/2019

IN THE MATTER OF:

Seeking approval of the Honourable Commission for additional subsidy requirement for additional units of supply to agriculture over and above the Tariff Order approved quantity due to extension of supply to agriculture over and above the stipulated 7 Hrs. supply and extending supply to the agriculture from 7 Hrs. to 9 Hrs. a day from 15-02-19 in the jurisdiction of Eastern Power Distribution Company of Andhra Pradesh Limited in the state of Andhra Pradesh during FY 2018-19.

AND

IN THE MATTER OF:

Eastern Power Distribution Company of A.P Limited (APEPDCL)

- Petitioner

- 1) Government of Andhra Pradesh represented by Chief Secretary, Velagapudi, Amaravathi, A.P
- 2) Southern Power Distribution Company of A.P. Limited represented by its Chairman & Managing Director, Tirupathi, A.P

- Respondents

Affidavit

I, Y.S.N Prasad, Son of Sri Y.Krishna Murthy, aged about 59 years, residing at Visakhapatnam, the deponent named above do hereby solemnly affirm and state on oath as under:-

1. That the deponent is the Chief General Manager, PPA, RA & QC of Eastern Power Distribution Company of AP duly authorized by APEPDCL to make this affidavit on its behalf and the deponent is acquainted with the facts deposed below,

I, Y.S.N Prasad, the deponent named above do hereby verify that the
contents of the affidavit and those of the accompanying petition are true to my
personal knowledge and verify that no part of this affidavit is false and nothing
material has been concealed.

DEPONENT
CHIEF GENERAL MANAGER
PPA, RA & QC
A.P.E.P.D.C. LTD.
VISAKHAPATNAM-13

VERIFICATION:

I, the above named Deponent solemnly affirm at Visakhapatnam on this Add day of June, 2019 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.

DEPONENT CHIEF GENERAL MANAGER PPA, RA & QC A.P.E.P.D.C. LTD. VISAKHAPATNAM-13

Solemnly affirmed and signed before me.

K.S.v. Soular FCS-8286 Company Secretary CORPORATE OFFICE Eastern Power Distribution Company of A.P. Ltd., VISAKHAPATNAM

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- Respondents

MOST RESPECTFULLY SHOWETH THE SUBMISSION

The APEPDCL humbly submits the following:

It is submitted that, the sales to agriculture proposed in the ARR and approved in the Tariff Order for FY 2018-19 is based on the historical sales. The actual sales to this category is primarily dependent on the climatic conditions such as low rainfall during the year, the water level falling down resulting in more working hours of the pump sets by individual

farmers in most of the areas of the licensee's jurisdiction (within the stipulated 7 Hrs. supply). Inspite of strict implementation of agricultural supply timings (7Hrs. duration per day), the agricultural sales volume has been increased considerably. Thus it is submitted that the licensee has no control over the agricultural sales in the circumstances explained.

Further, the GoAP have directed the DISCOM to extend supply to agriculture in excess of stipulated 7 Hrs. a day on need basis to save the crops being dried up at various places in the state. Accordingly, supply was extended to agriculture for additional hours in East and West Godavari Districts. The consequent additional sales to agriculture is submitted hereunder. In addition to the above, as per G.O.Ms.No.17, dt.15-02-2019, the APEPDCL have been extending supply to the agriculture from 7 Hrs. to 9 Hrs. a day from 15-02-19 onwards.

Table-1: Addl. Sales volume due to extension of supply to agriculture for additional hours in excess of stipulated 7 hours a day during FY 2018-19

SI	Circle	No of 11	No of addl. Hrs of	Per	riod	Addl. Agl sales	
No	Circle	KV feeders	supply	From	То	volume in MU	
1	Rajamahendaravaram	18	2 Hrs	01.04.18	30.06.18	11.84MU	
	Eluru	3	2 Hrs	16.09.18	13.11.18	33.09 MU	
2.		41	2 Hrs	10.10.18	13.11.18		
		24	2 Hrs	25.10.18	13.11.18		
	Total	86				44.93	

Table-2: As per the G.O.Ms.No.17, the additional agricultural sales volume for the months of Feb'19 & Mar'19

S.No	Period	Agl. Consumption (MU)	Agl. Consumption (MU per Hour)	Assessed Agl. Consumption for additional hours of 3 phase power supply (MU)			
	(a)	(b)	(c) = (b)/(a)	(d) = (c)*2 Hrs.*No. of days of 9 Hrs. supply			
1	Feb'19 (01-02-19 to 14-02-19: 7 Hrs. supply) (15-02-19 to 28-02-19: 9 Hrs. supply) Total 3 Phase supply hours – 224 Hrs.	282	1.26	35.28			
2	Mar'19 (Total 3 Phase supply hours – 279 Hrs.)	383.77	1.37	84.94			
	Total			120.22 MU			

The overall actual sales to LT Agriculture Consumers during FY 2018-19 is 2179.77 MU, which is excess by 89.50 MU over the approved quantity of 2090.27 MU. The major reasons for such huge increase are:

- a) Extending supply beyond stipulated 7 Hrs. a day to save the crops due to acute rainfall shortage at certain areas in two districts of the licensee's jurisdiction, as per the directions of GoAP.
- b) Acute rainfall shortage in most of the areas of the licensee's jurisdiction resulting in deep ground water tables.
- c) As per G.O.Ms.No.17, dt.15-02-2019, the APEPDCL has been extending supply to the Agriculture from 7 Hrs. to 9 Hrs. a day from 15-02-19 onwards.

The additional cost towards additional sales to agriculture over and above the Tariff Order approved quantity shall be payable by GoAP as additional subsidy to the licensee's at the rate of LT CoS.

The actual and approved sales (with excess quantities) to LT agricultural consumers during FY 2018-19 and computation of subsidy requirement are as follows:

				A	Actual Ag	ricultural S	Sales for F	Y 2018-19	in MU					
SI. No.	Circle	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Total
1	Srikakulam	6.50	11.00	6.00	3.00	3.00	7.50	7.00	4.90	5.02	10.00	12.00	20.62	96.54
2	Vizianagaram	5.50	10.00	4.00	4.00	3.00	6.50	4.00	4.47	3.50	10.00	14.00	12.32	81.29
3	Visakhapatnam	10.50	10.00	12.00	3.00	3.00	7.00	5.00	5.05	4.00	6.00	17.00	30.71	113.26
4	Rajahmundry	59.50	60.00	23.00	12.00	13.00	45.00	37.00	22.90	36.00	54.00	64.00	93.72	520.12
5	Eluru	135.00	145.00	57.00	36.00	33.00	100.00	106.00	87.16	108.00	160.00	175.00	226.40	1368.6
6	TOTAL	217.00	236.00	102.00	58.00	55.00	166.00	159.00	124.48	156.52	240.00	282.00	383.77	2179.77
7	Approved as per Tariff Order for FY2018-19	233.80	268.32	53.68	61.11	104.06	150.41	121.71	117.76	174.01	217.38	266.42	321.61	2090.27
8	Excess quantity	-16.80	-32.32	48.32	-3.11	-49.06	15.59	37.29	6.72	-17.49	22.62	15.58	62.16	89.50
9	Approved LT Cos for FY 2018-19 (Rs./Unit)	6.07												
10	Subsidy requirement (Rs. in Crs)	-10.20	-19.62	29.33	-1.89	-29.78	9.46	22.64	4.08	-10.62	13.73	9.46	37.73	54.33

The additional subsidy requirement for the above additional sales to agriculture over and above the Tariff Order approved quantity is worked out to be Rs.54.33 Crs. (89.50 MU x Rs.6.07).

In the above circumstances, the licensee humbly prays the Honorable Commission:

i. To approve the action taken by the Discom in extending supply to agriculture in excess of stipulated hours in view of the directions of the GoAP to save the crops which are being dried up due to acute shortage of rain fall and in support of the farmers of the state and extending supply to the agriculture from 7 Hrs. to 9 Hrs. a day from 15-02-19 onwards.

- ii. To approve the additional sales volume of 89.50 MU which are estimated as per actuals for the FY 2018-19.
- iii. To issue necessary directions to the GoAP to provide Rs. 54.33 Crs. as additional subsidy towards the cost of power purchase towards additional sales to LT agriculture over and above the Tariff Order quantity for FY 2018-19.
- iv. To pass such order as the Honourable Commission may deem fit and proper in the facts and circumstances explained above.

EASTERN POWER DISTRIBUTION COMPANY OF ANDHRA PRADESH LIMITED
(APPLICANT)

Through

Place: Visakhapatnam Date: 13 -06-2019

Chief General Manager
PPA, RA & QC
CHIEF GENERAL MANAGER
PPA, RA & QC
A.P.E.P.D.C. LTD.
VISAKHAPATNAM-13