

**BEFORE THE HONOURBLE ANDHRA PRADESH ELECTRICITY  
REGULATORY COMMISSION**

**AT ITS OFFICE AT 4<sup>th</sup> FLOOR, SINGARENI BHAVAN, RED HILLS, HYDERABAD.**

**Filing No.        /2018  
in O.P. Nos. 60 & 61 of 2017**

**IN THE MATTER OF:**

Filing of addendum to the ARR application in respect of Retail Supply Business and proposed Tariffs for FY 2018-19 under multi-year tariff principles in accordance with the “Andhra Pradesh Electricity Regulatory Commission (Terms And Conditions For Determination Of Tariff For Wheeling And Retail sale Of Electricity) Regulation, 2005” by the Eastern Power Distribution Company of Andhra Pradesh Limited(‘APEPDCL; or ‘the Company’ or ‘the Licensee’) Southern Power Distribution Company of Andhra Pradesh Limited(‘APSPDCL; or ‘the Company’ or ‘the Licensee’) as the Distribution and Retail Supply Licensees.

**IN THE MATTER OF:**

- 1. Eastern Power Distribution Company of A.P Limited (APEPDCL)**
- 2. Southern Power Distribution Company of A.P Limited (APSPDCL)**

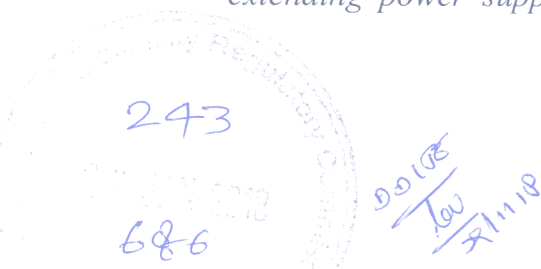
- Petitioners

**MOST RESPECTFULLY SHOWETH THE SUBMISSION:**

**The APDISCOMs humbly submits the following:**

**I.     Tariff Proposal of separate category under HT –II (Others) as HT –II (d) Startup Power for Captive Generating Plants, Co-Generation Plants and Renewable Generation Plants**

1. It is to submit that the Hon’ble APERC in the Regulation No. 3 of 2017, (regarding Power evacuation from Captive Generation, Co-Generation & Renewable Energy Source Power Plants) vide clause 17 has directed “*APTRANSCO/DISCOMs for extending power supply to these generating plants either at Low Tension or High*



*Tension as desired by the producer / developer for maintenance, startup operations and lighting purpose. The tariff for these plants for FY 2017-18 shall be charged at the rate of 11.77/Unit without any fixed and minimum charges. The DISCOMs shall file tariff proposals under section 62 of the Electricity Act, 2003 in the ARR Proposal of FY 2018-19, for supply of electricity to this type of Power Plants”.*

2. In compliance to the above stated clause in the regulation, the APDISCOMs could not file any tariff proposal as such for the startup power in the filing of proposed tariffs (FPT) for FY 2018-19 made before the Hon’ble APERC. The DISCOMs humbly submit that the delay in filing of separate tariff as directed is due to an in depth study carried out by the Licensees in this regard, and the delay may please be condoned.
3. Presently the power drawn by the Captive / Co-Generation/ Renewable Energy Sources is categorized under HT Industrial (IA) and the existing tariffs and the proposed tariff for FY 2018-19 for HT I Industry-General is as follows:

Voltage of Supply	HT I Industry – General	
	Demand Charges (Rs/kVA/Month)	Energy Charges (Rs/kVAh)
132 kV & above	475	5.44
33kV	475	5.87
11kV	475	6.33
Time of the Day (TOD) Tariff:Rs 1.05/kVAh extra for the consumption during the period 18:00 to 22:00 Hrs		

4. The following are the general observations on start-up power.
  - a. Start-up power is required to start the Generating Station from shut down stage. Power is required to run the unit auxiliaries, they in turn run the plant resulting in generation of power. Once unit is started, the unit auxiliaries start drawing from the main plant itself as auxiliary consumption.
  - b. The percentage auxiliary consumption for different plants is as following:
    - i. Thermal: Coal based –around 10%, Gas based – around 3%-6%
    - ii. Hydro- 2%-3%

- c. All the main generating stations who have PPAs with the DISCOMs would have inherent clause about drawl of Startup power and treatment of the same on the basis of “net off” or payment by applying a tariff (usually HT Industry).
  - d. The plants covered in Long-Term PPAs will not have any HT supply agreement with the DISCOMs.
  - e. The Regulation mentions about Captive Generation, Co-Generation & Renewable Energy Source Power Plants
  - f. The quantum of energy used by a captive power plant over a period may not be substantial. Consumption of power for such purpose is not likely to be more than 10% of the total installed capacity of one of generating units of a captive power plant.
  - g. The nature of demand of captive power plants is only temporary as the same is required only for starting up a plant. Subsequent to a start-up, the grid power is required only in emergencies to start the generation, which may be required during breakdown and unscheduled outage, etc.
  - h. There are certain judicial pronouncements on this issue and the Hon’ble Appellate Tribunal and other State Electricity Regulatory Commissions (SERCs) have directed to categorize startup power as a separate category.
5. Accordingly, it is proposed to include a separate category under HT –II (Others) as HT –II (d) Startup Power for Captive Generating Plants, Co-Generation Plants and Renewable Generation Plants, with the proposed tariff and conditions as below.

Voltage of Supply	HT II-(d)	
	Demand Charges (Rs/kVA/Month)	Energy Charges (Rs/kVAh)
All Voltages	475	11.77

Rs 1.05/kVAh Time of the Day (TOD) tariff is leviable on energy consumption during the period from 06:00 P:M to 10:00 P:M, in addition to the normal energy charges at respective Voltages.

## Conditions

- i. Contracted maximum demand under this category is limited to percentage norm (10% in Thermal, 6% in Gas, 3% in Hydel) of the maximum capacity unit in the Generating Station.
- ii. Supply is to be used strictly for startup operations, maintenance, and lighting purposes only and shall not be extended for process plant.
- iii. Demand charges are leviable only if the monthly load factor of the consumer exceeds 10% in accordance with billing demand condition under HT –II (A).
- iv. If RMD exceeds CMD the penal charges on Demand & Energy will be applicable as per the existing conditions of HT-II (A) others category, even if the monthly load factor is equal or below 10%
- V. Monthly minimum charges on energy are not applicable to this category.
- vi. All other conditions applicable to HT-II (A) Others category shall also apply to this category

## II. Change of Nomenclature for Non-Profit Organizations in LT Category–VII(A):

### General Purpose.

As per the Tariff Order for FY 2017-18, the applicability of tariffs for Public Charitable Institutions is as follows:

The LT Cat-VII (A) General Purpose is applicable for charitable institutions i.e. Public Charitable Trusts and Societies registered under the Societies Registration Act running educational and medical institutions on a no profit basis.

Relevant extracts from the Tariff Order are as below:

### **“1.7.1 LT CATEGORY–VII (A): GENERAL PURPOSE**

#### ***Applicability***

Applicable for supply of energy to places of Crematoriums, Government Educational Institutions and Student Hostels run by Government agencies, Charitable Institutions i.e., Public charitable trusts and societies registered under the Societies Registration

Act running educational and medical institutions on a no profit basis, recognized service institutions and registered old age homes.”

For Public Charitable Institutions under HT Category, the applicable tariff Clause is as follows:

In respect of public charitable institutions rendering totally free service to the general public, the overall KVAh rate (including customer charges) may be limited to the tariff rate under LT Cat-VII (A) General Purpose may be limited to the tariff.

#### **“5.2.1 HT CATEGORY-II (A): OTHERS**

##### ***Applicability***

This tariff is applicable to all HT consumers other than those covered under HT Categories I, II (B) and III to VII:

<b>Demand Charges &amp; Energy Charges</b>		
<b>Voltage of Supply</b>	<b>Demand Charges Rs/kVA/month of Billing Demand</b>	<b>Energy Charges Rs/kVAh *</b>
132 kV and above	475	6.72
33 kV	475	6.98
11 kV	475	7.66
* Rs 1.05/ kVAh Time of Day Tariff is leviable on energy consumption during the period from 06:00 PM to 10:00 PM, in addition to the normal energy charges at respective voltages.		

Note: In respect of Government controlled Auditoriums and Theatres run by Public Charitable Institutions for purpose of propagation of art and culture which are not let out with a profit motive and in respect of other Public Charitable Institutions rendering totally free service to the general public, the overall kVAh rate (including customer charges) may be limited to the tariff rates under L.T. Category-VII (A) General purpose, in specific cases as decided by the Licensee.”



In this regard, it is proposed to change the applicability of tariffs under LT Cat-VII (A) General Purpose to the public charitable institutions as given below:

**“LT CATEGORY–VII (A): GENERAL PURPOSE**

***Applicability***

Applicable for supply of energy to places of Crematoriums, Government Educational Institutions and Student Hostels run by Government agencies, Charitable Institutions i.e., Public charitable trusts and societies registered under the Societies Registration Act running educational and medical institutions rendering totally free service to the general public, recognized service institutions and registered old age homes.”

**In the above circumstances, the licensee humbly pray the honorable Commission:**

- i. To approve the proposal of separate category under HT –II (Others) as HT –II (d) Startup Power for Captive Generating Plants, Co-Generation Plants and Renewable Generation Plants, with the above proposed tariff and conditions
- ii. To approve the proposed change the applicability of tariffs under LT Cat-VII (A) General Purpose to the public charitable institutions.
- iii. 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  
SOUTHERN POWER DISTRIBUTION COMPANY OF ANDHRA PRADESH LIMITED**

**(APPLICANTS)**

Through

  
**Chief General Manager  
Plg, PPA&RA, APEPDCL  
VISAKHAPATNAM**

**Place: Visakhapatnam.**

**Date : 26.01.2018.**

**BEFORE THE HONOURBLE ANDHRA PRADESH ELECTRICITY  
REGULATORY COMMISSION  
AT ITS OFFICE AT 4<sup>th</sup> FLOOR, SINGARENI BHAVAN, RED HILLS, HYDERABAD.**

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- Petitioners

**AFFIDAVIT OF THE APPLICANT VERIFYING THE APPLICATION ACCOMPANYING  
ADDENDUM FILING AS PER TERMS AND CONDITIONS OF TARIFF FOR WHEELING  
AND RETAIL SALE OF ELECTRICITY**

I, Kanchumurthy Prasad, Son of Sri K. Suryanarayana, 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/ Planning, PPA & RA of Eastern Power Distribution Company of AP Limited duly authorized on behalf of both APDISCOMs (APEPDCL & APSPDCL) to be file this affidavit and the deponent is acquainted with the facts deposed below,

2. I, Kanchumurthy 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  
Planning, PPA & RA  
A.P.E.P.D.C. LTD.  
VISAKHAPATNAM-530 013


**VERIFICATION:**

I, the above named Deponent solemnly affirm at Visakhapatnam on this 26<sup>th</sup> day of January, 2018 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  
Planning, PPA & RA  
A.P.E.P.D.C. LTD.  
VISAKHAPATNAM-530 013

Solemnly affirmed and signed before me.

  
Company Secretary  
CORPORATE OFFICE  
Eastern Power Distribution  
Company of A.P.E.P.D.C.  
VISAKHAPATNAM