

Before the
MAHARASHTRA ELECTRICITY REGULATORY COMMISSION
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Case No. 31 of 2009

In the matter of
Maharashtra State Electricity Distribution Company Ltd. (MSEDCL)'s Petition for
determination of Additional Supply Charge for withdrawal of Load Shedding in
the Headquarters of Revenue Divisions in MSEDCL Licence Area

Shri. V. P. Raja, Chairman
Shri. S. B. Kulkarni, Member
Shri. V.L. Sonavane, Member

ORDER

Dated: November 30, 2009

The Maharashtra State Electricity Distribution Company Limited (MSEDCL) submitted a Petition dated June 15, 2009 under Sections 62(3), 62(4), 86(1)(b) and 94(2) of the Electricity Act, 2003 (EA 2003), and under Clause 8.2.1 of the Tariff Policy notified by the Government of India, for determination of Additional Supply Charges for withdrawal of load shedding in the headquarters of Revenue Divisions in MSEDCL licence area, viz., Amravati, Nagpur, Aurangabad, Nasik, Pune, Thane and Vashi.

2. MSEDCL, in its Petition, prayed as under:

“

- a. *For implementation of withdrawal of load shedding in the headquarters of the Revenue Division of Thane, Vashi, Nasik, Aurangabad, Nagpur, Pune and Amravati.*
- b. *Honourable Commission may approve the proposal for determination of Additional supply Charge for the above areas as proposed by MSEDCL;*
- c. *Honourable Commission may determine a ceiling rate for procurement of power purchase on a yearly basis, beyond which the power is not to be procures for the beneficiary area.*



- d. Honourable Commission may approve implementation of such model for the period July 2009 – June 2010 and thereafter.*
- e. Honourable Commission may permit a detailed reconciliation of all costs and recovery on a quarterly basis.*
- f. Honourable Commission may permit adjustment for any under/ (over) recovery which will be carried out in every quarter and recovery to be effected in subsequent quarter.*
- g. The Honourable Commission may consider the above proposal for a favourable dispensation.*
- h. The Honourable Commission may condone errors/omission, if any, and may please give an opportunity to rectify the same and to file additional data, information as may be required.”*

3. MSEDCL submitted that the genesis of the Proposal was that the validity of the earlier Orders, wherein the Commission had approved the concept of Interim Franchisee and the Reliability Charges, had come to an end, and there was a need to put in place a framework for the subsequent period.

4. MSEDCL submitted that while the above Orders gave a broad framework for mitigating load shedding, these Models had failed to meet the objective of zero load shedding (ZLS) on account of the following reasons:

- i. The role of the Interim Franchisee was to facilitate the power procurement process by identifying the source of power. However, the Interim Franchisees, viz., The Tata Power Company Limited (TPC), Thane Small Scale Industries Association (TSSIA) and Thane Belapur Industries Association (TBIA) for Pune, Thane and Vashi, respectively, failed to identify the required quantum of power for these areas, which was the key reason for non-implementation of the ZLS model.
- ii. There was an increase in the demand-supply gap, and hence, increase in the power requirement to mitigate load shedding.
- iii. Although the Commission had permitted purchase of infirm power for the beneficiary areas, the rates of infirm power rose very sharply, exceeding the rate prescribed by the Commission.
- iv. The day ahead power was infirm in nature, and MSEDCL could not inform consumers of the reduction in load shedding on account of this power availability, which further aggravated the situation for the consumers.

5. The Commission conducted a Technical Validation Session (TVS) on the Petition filed by MSEDCL, on July 10, 2009, in the presence of Consumer Representatives authorised on a standing basis under Section 94 of the Electricity Act, 2003 (EA 2003). During the TVS, the following observations/directions were inter-alia, made by the Commission:

- a) The model should be revenue neutral and there should be no extra burden on the consumers of other regions on account of implementation of this model in selected areas.
- b) In case of increase in demand-supply gap, the electricity should not be diverted from their quota to mitigate load shedding in the headquarters of Revenue Divisions.
- c) MSEDCL should submit legal opinion regarding the legal tenability of levying Additional Supply Charge for withdrawal of load shedding in the headquarters of Revenue Divisions of MSEDCL licence area, by allocating costly power to their areas, and keeping in view the need to ensure against discrimination within the consumers of the licence area.
- d) MSEDCL should submit a revised Petition with the calculation of the Additional Supply Charge based on different scenarios of load shedding as well as addressing other queries raised during the TVS.

6. In accordance with the Commission's above directions during the TVS, MSEDCL submitted its revised Petition in the matter on July 28, 2009, with the following prayers:

- a) *“Approve implementation of proposal of withdrawal of load shedding in the headquarters of the Revenue Division of Thane, Vashi, Nasik, Aurangabad, Nagpur, Pune and Amravati.*
- b) *Approve the proposal for determination of Additional supply Charge for the above areas as proposed by MSEDCL;*
- c) *Determine a ceiling rate for procurement of power purchase on a yearly basis, beyond which the power is not to be allocated for the beneficiary area.*
- d) *Approve implementation of such model for the period September 2009 - August 2010 and thereafter.*
- e) *Permit a detailed reconciliation of all costs and recovery on a quarterly basis.*

- f) Permit adjustment for any under/ (over) recovery which will be carried out in every quarter and recovery to be effected in subsequent quarter.*
- g) Consider the above proposal for a favourable dispensation.*
- h) Condone errors/omission, if any, and may please give an opportunity to rectify the same and to file additional data, information as may be required.”*

7. In the revised Petition, MSEDCL submitted as under:

- a) MSEDCL has taken the initiative and explored the options for giving power supply on a continuous basis to the growth centres and economic driving engines in the State of Maharashtra. MSEDCL has identified the six towns, which are Revenue Division Headquarters, as areas for giving continuous power supply.
- b) Maharashtra's topography is classified into five broad regional groups, historically evolved as socio-cultural units - Greater Mumbai, Western Maharashtra, Marathwada, Konkan and Vidarbha, Mumbai being the country's prime metropolis. These regions are divided into six Administrative Divisions, which are the main revenue earning areas of the State namely, Amravati Division, Aurangabad Division, Konkan Division, Nagpur Division, Nashik Division and Pune Division. These Divisions have their headquarters at Amravati, Aurangabad, Navi Mumbai, Nagpur, Nashik, and Pune, respectively.
- c) MSEDCL has also included the areas such as Mulund and Bhandup within the Municipal limits of Greater Mumbai, for withdrawal of load shedding, as these areas are indistinguishable from other parts of Mumbai, and have a very high dependence on electricity and being a part of the Municipal limits of Greater Mumbai, the consumers have a feeling of discrimination as they are subjected to load shedding while the rest of Mumbai is not subject to load shedding.
- d) These Revenue Division headquarters are cities spread across the State of Maharashtra and are pivotal to the growth of the State as a whole. These regional headquarters are urban centres attracting investments and are driving engines of growth and it is necessary to ensure that these regional headquarters get uninterrupted supply of power.

- e) MSEDCL proposes that these regional Headquarters be given priority and efforts be made to mitigate load shedding in these areas on a priority basis for better administration in these areas.
- f) MSEDCL is aware of its responsibility to ensure continuous and reliable supply in its entire licence area, however, given the constraints of availability of power, MSEDCL proposes to undertake withdrawal of load shedding in a phased manner as under:
- a. Headquarters of Revenue Division areas
 - b. District Headquarters
 - c. Municipal Corporation areas
 - d. Other Areas having national and regional significance like tourist areas etc.
 - e. Taluka Headquarters
- g) The Petition is based on the provisions of Clause 8.2.1 of the Tariff Policy notified by the Ministry of Power, Government of India, as reproduced below:

“...Consumers, particularly those who are ready to pay a tariff which reflects efficient costs have the right to get uninterrupted 24 hours supply of quality power...”

- h) Thus, in other words, it can also be stated that consumers who desire to have uninterrupted power supply can be levied certain additional charges. The basic premise here is the willingness of the consumers to pay for getting additional benefit.
- i) The Interim Franchisee has no legal status to represent the mass of consumers in an area and it is the people’s representatives who have the constitutional right to represent the people in an area, hence, MSEDCL has interacted with the people’s representatives of the regional Headquarters to assess their willingness to pay the higher cost to mitigate load shedding and have continuous power supply.
- j) The case under consideration is special in nature and considering that the proposal is going to benefit a particular group of consumers, it merits a separate “Tariff Dispensation” from other consumers in the same category.

- k) Change in tariff or levy of additional charge is governed by Section 62 (4) of the Electricity Act, 2003, and it may not be possible to effect any change in the same more than once a year. However, the present proposal is not an “ordinary” proposal within the normal business operations of MSEDCL and hence, warrants a special treatment and speedy dispensation from the Commission.
- l) MSEDCL proposes to continue procurement of power through the regular power purchase activity, based on the Principles and Protocols of Load Shedding (PPLS) prevalent at a given point of time, availability of power, seasonal variations, etc. MSEDCL will allocate the costly power from its Merit Order Despatch to the headquarters of revenue Divisions, such that the consumers of those regions will have to bear the additional cost only to the extent required for mitigation of load shedding in these areas.
- m) MSEDCL would consider the following steps for working of the proposal:
- a. Estimate minimum requirement of power for maintaining PPLS
 - b. Estimate the power purchase requirement of the areas considered for withdrawal of load shedding.
 - c. Procure additional power to mitigate load shedding in these particular areas
- n) It would be the endeavour of MSEDCL to procure additional power to mitigate load shedding. MSEDCL, being one of the largest distribution licensees in the country, is in a position to procure power at competitive rates due to economies of scale, which an Interim Franchisee would not be able to get on account of requirement of small quantity of power.
- o) While MSEDCL will endeavour to procure additional power for these regions, at the same time, MSEDCL will ensure that the regions other than the Headquarters of Revenue Division areas are subject to load shedding only in accordance with the PPLS. With the power exchanges presently working on a wide spread basis, it will be possible to procure power on economical rates on a day ahead basis for mitigating load shedding for the Regional Headquarters, and it shall not be done by increasing load shedding for the other regions.
- p) Assumptions for Calculation of Additional Supply Charge:

a. Period of model:

The Model will be implemented from the month subsequent to the month in which the Commission issues the order and thereafter for a period of 12 months. For the purpose of calculation, the period assumed is September 2009 to August 2010.

b. Load shedding protocol:

The hours of load shedding have been considered as per Load Shedding Circular No. 27 effective from June 13, 2009, as under:

Region	Other regions	Agricultural dominated regions
Groups	Hours	Hours
A	1.75	7.50
B	2.50	8.00
C	3.25	8.50
D	4.00	9.00
E	4.50	9.50
F	5.50	10.00

Based on the above Load Shedding protocol, the MW and MU requirement for the Revenue Division Headquarters including Urban and Staggered industrial feeder works out to 446 MW on 12 hour basis and 5.35 MU, as shown in the below table:

Circle	MW Requirement for 12 hrs to mitigate load shedding	MU Requirement for to mitigate load shedding
	MW	MU
Pune	135	1.62
Thane	68	0.82
vashi	81	0.97
Nagpur	57	0.68
Amravati	12	0.15
Nashik	39	0.46
Aurangabad	55	0.66
TOTAL	446	5.35

For Nagpur and Amravati region, consumption of one-day staggered industrial consumers has been excluded from the requirement. The industrial consumers of Nagpur facing one-day of staggered load shedding, have stated that they would be following a holiday on the staggered day followed in their region. Hence, the consumption during the staggered day would be limited to lighting requirement, which would be around 10% of the total requirement of such industrial consumers. Also, the industrial consumers of Nagpur facing one-day of staggered load shedding have expressed their willingness to contribute 25 paise per unit for facilitating the withdrawal of load shedding in Nagpur Urban Circle.

c. Power Procurement cost:

MSEDCL shall procure additional power to mitigate Load Shedding in these areas. The power purchase rate for the purpose of calculation of Additional Supply Charge has been considered at Rs. 6.75 per unit based on the average price of traded power purchased by MSEDCL in FY 2008-09.

MSEDCL submitted that there are wide fluctuations in the cost of short term power with the cost of power traded going up to Rs. 14 per unit. MSEDCL submitted that the Commission should specify a price cap beyond which the average power purchase price should not go for these areas during the period of the scheme.

d. Consumption:

The following consumer categories are proposed to be exempted from the levy of Additional Supply Charge, viz.,

- HT Industries (Express feeder),
- PWW (Express)
- Railway traction.
- Below Poverty Line (BPL) consumers,
- Agriculture consumers.

e. Growth rate:

The growth rate for consumption is assumed at 5.23%, in accordance with the CAGR of sales of 5.23% considered by the Commission in the recent Tariff Order on MSEDCL's Annual Performance Review (APR) Petition for FY 2008-09.

f. Distribution losses:

The individual area Distribution losses in FY 2008-09 have been considered.

g. Average Billing Rate:

The Average Billing Rate has been considered on the basis of the actual demand and the billed units for each region.

h. Other Assumptions:

Other assumptions considered for determination of Additional Supply Charge are given in the Table below:

Assumptions								
Particulars	Units	Pune	Nagpur	Amravati	Nasik	Thane	Vashi	Aurangabad
Power Purchase Rate	Rs/kwh	6.75	6.75	6.75	6.75	6.75	6.75	6.75
Power Purchase Hours	Hr	12	12	12	12	12	12	12
MW Requirement	MW	135	57	12	39	68	81	55
Hours Requirement	Hr	12	12	12	12	12	12	12
MU Requirement per day	MU	1.62	0.68	0.15	0.46	0.82	0.97	0.66
Distribution Loss of the region for period April 08 to Mar 09	%	10.32%	22.32%	27.60%	11.18%	14.58%	9.59%	30.26%
Effective days of load shedding as per year 2008-09	%	80%	80%	80%	80%	80%	80%	80%
Consumption		All consumers to be charged excluding express feeder and BPL (One day staggering MIDC excluded for Nagpur and Amravati)						
Average Consumption for period April 08 to Mar 09 excl express feeder	MU	342	86	16.17	62	138	174	65
Consumption Growth Rate	%	5.23%	5.23%	5.23%	5.23%	5.23%	5.23%	5.23%
Average Consumption Considering Growth Rate as above	MU	360	91	17	65	145	183	68
Average Billing Rate for ZLS area	Rs/kwh	5.26	4.65	4.27	4.40	5.29	5.33	4.40

i. For Nagpur, Amravati, Aurangabad and Nashik, it is proposed that the model will be implemented for a period of nine (9) months and in the months of June, July and August 2010; these regions will be subjected to load shedding. However, the levy and recovery of Additional Supply Charge will be spread over the entire period of 12 months.

j. The calculation of Additional Supply Charges have been done for the headquarters of Revenue Division areas of Thane, Vashi, Nasik, Aurangabad, Nagpur, Pune and Amravati, irrespective of the Distribution and Collection (DCL) losses for each Division.

k. The Commission in its Order dated June 20, 2008 in Case No. 5 of 2008 had given the standard methodology for calculation of Reliability Charges. In the standard methodology, any additional power not utilised by the ZLS areas was to be sold in the State and the additional cost of power purchase was loaded on the ZLS area after reducing the Average Billing Rate of the State as a whole (Stage II of computations). In the proposed model, as there is allocation of the power purchase cost from the existing power purchased and the additional power sourced for these regions, there will be no additional burden of Reliability Charge under Stage II. Hence, the consumers are to be levied Reliability Charges in the form of Additional Supply Charge only for that power that has actually been utilised to mitigate load shedding in the beneficiary areas only.

l. Based on the above assumptions, the summary of Additional Supply Charge for consumers of Headquarters of Revenue Division is as under:

(Rs/kWh)

Region	Additional Supply Charge
Pune	0.24
Nagpur	0.40
Amravati	0.57
Nasik	0.37
Thane	0.32
Vashi	0.26
Aurangabad	0.63

m. Any revision in the hours of load shedding during the period of the Model, i.e., from September 2009 to August 2010, will have an impact on such arrangement. If the load shedding hours are increased, and there is a constraint on the availability of additional power; proportionate load shedding will have to be undertaken by MSEDCL. Alternatively, if there is a reduction in the hours of load shedding, the consumers will get the benefit and MSEDCL will allocate power to the extent required to mitigate load shedding for these areas. The scenarios under the various protocols are as under:

Requirement of power to mitigate Load Shedding in Rev. Comm. HQ & Mumbai Metropolitan Area Considering All ABCDEF groups

Circle	Scenario-I		Scenario-II		Scenario-III		Scenario-IV		Scenario-V		Scenario-VI	
	MW	MU	MW	MU	MW	MU	MW	MU	MW	MU	MW	MU
Pune	113	1.35	135	1.62	146	1.75	179	2.15	201	2.41	223	2.68
Thane	55	0.65	68	0.82	75	0.90	96	1.15	110	1.31	123	1.48
vashi	71	0.85	81	0.97	86	1.03	101	1.21	111	1.33	121	1.45
Nagpur	60	0.71	57	0.82	73	0.88	86	1.04	95	1.14	104	1.25
Amravati	12	0.14	12	0.16	14	0.17	17	0.21	19	0.23	21	0.25
Nashik	33	0.39	39	0.46	42	0.50	51	0.61	57	0.69	63	0.76
Aurangabad	50	0.60	55	0.66	57	0.68	64	0.76	68	0.82	72	0.87
Total	392	4.70	446	5.51	493	5.91	594	7.12	661	7.93	728	8.74

8. Subsequently, MSEDCL also submitted the legal opinion provided by Shri. Ravi Prakash, Advocate, which broadly stated that in view of the following, MSEDCL's Petition was legally maintainable:

- a) The Judgment given by the Appellate Tribunal for Electricity (ATE) in Appeal No. 64 of 2004 in the matter of M/S H.M. Steel Ltd. vs. Himachal Pradesh Electricity Regulatory Commission & Ors.
- b) The Commission's powers under Sections 23, 62(3) and 86(b) of the EA 2003
- c) Various Orders passed by the Commission, which provided for rationing of electricity supply amongst various consumer categories based on certain criteria, which inherently implies different supply to different categories.

9. Based on the above submissions made by MSEDCL, the Commission admitted MSEDCL's Petition to withdraw load shedding in Headquarters of Revenue Divisions, by payment of Additional Supply Charges, on August 20, 2009. The Public Hearings in the matter were scheduled on the following dates at the following locations:

Sl.	Place	Time	Date of Hearing
1	Amravati	11:00 hours	Oct 27, 2009
2	Nagpur	11:00 hours	Oct 28, 2009
3	Aurangabad	11:00 hours	Oct 30, 2009
4	Nashik	11:00 hours	Nov 3, 2009
5	Pune	11:00 hours	Nov 5, 2009
6	Navi Mumbai	11:00 hours	Nov 6, 2009

10. The Commission directed MSEDCL to publish the Public Notice in the matter, and the copies of MSEDCL's Petition were made available to the stakeholders at the respective Divisional offices as well as on MSEDCL's website.

11. The comments and suggestions received during the Public Hearings have been summarised below, location-wise:

Amravati

The Vidarbha Industries Association (VIA) supported the Zero Load Shedding (ZLS) proposal submitted by MSEDCL and requested the Commission to issue an Interim Order in the matter at the earliest. VIA referred to the Tariff Order for MSEDCL for FY 2009-10 and submitted that due to reduced transmission and distribution losses and increased Average Billing Rate, the Reliability Charge in Amravati area would be lower at Rs. 0.43 per unit. VIA requested the Commission to issue an Interim Order approving the Reliability Charge of Rs. 0.43 per unit.

MIDC Industries Association, Amravati welcomed MSEDCL's ZLS proposal and requested the Commission to exclude MIDC industries from levy of Additional Supply Charge (ASC) since the industries are ready to face one staggered load shedding as being done under prevailing load shedding scenario. MIDC Industries Association pointed out that most of the coal based power generation plants are located in Vidarbha region and cause great suffering to the local residents in the form of environmental pollution, use of water reservoirs solely for power generation plants, etc., and requested the Commission to subsidize the Vidarbha region consumers by giving 10% concession in prevailing tariff instead of levy of any ASC.

Shri Chandrasen Wankhede referred to the EA 2003 and submitted that the consumer should get uninterrupted and quality power supply at reasonable cost. Further, MSEDCL should strictly adhere to the load shedding protocol and stipulated load shedding hours. Shri Purushottam Bajaj, Shri Pravin Bajad, Shri Pramod Pande and many others welcomed the ZLS proposal for Amravati city; however, they opposed the levy of ASC.

Nagpur

VIA submitted that Vidarbha is the biggest producer of power and about 40% of the energy generated in the State is from the Vidarbha region. Vidarbha is subjected to pollution and the water resources are being utilized for generation purpose apart from

utilizing the coal and other minerals from Vidarbha area. VIA added that the total consumption in Vidarbha region is hardly 25% of the generation and rest of the power is being transferred to the Western part of the State. The corridors through which the power is being transferred to the Western part of the State are fully loaded, adding to transmission losses in the system. Further, it is becoming difficult to add more generation on existing network in Vidarbha area and it is technically infeasible to accommodate and provide open access to the small power generating stations coming up in Vidarbha, since the load in Vidarbha is very less as compared to the loading of the transmission and distribution systems. VIA pointed out that due to the problem of power evacuation, MSEDCL itself has submitted a Petition for withdrawal of load shedding in the areas where small generators are connected to the grid as power evacuation becomes difficult during load shedding hours. VIA requested the Commission to direct MSEDCL to withdraw load shedding in Vidarbha region in a phased manner, based on technical aspects and benefits to the grid, without levy of any ASC.

VIA further requested the Commission to direct MSEDCL to immediately submit further Petition for withdrawal of load shedding up to Taluka head quarter level for Vidarbha region.

VIA submitted that the Commission should direct MSEDCL to make arrangement to harness power from small generating projects, viz., biomass, CPP, etc., which are expected to come up in the very near future in large numbers and ensure network capacity addition to evacuate such power. VIA pointed out that number of hurdles are being created by MSEDCL and the Maharashtra State Electricity Transmission Company Limited (MSETCL) in getting open access, metering arrangement, sanction of protection schemes, communication facilities, etc. Normally the total time taken for all above sanctions is 9 to 12 months; however, it should not be more than 2 to 3 months. VIA requested the Commission to direct MSEDCL to immediately prepare a procedure and issue a time bound sanctioning scheme to avoid all such delays.

VIA suggested that for calculation of ASC for Vidarbha region, additional transmission losses of 4.85 % should not be considered, since the excess power generated in Vidarbha region shall be utilized for mitigating load shedding and the transmission losses for transferring power to Western part of Maharashtra would be reduced. VIA stated that additional MW requirement for Nagpur should be reduced to 57 MW from 59.38 MW as projected by MSEDCL.

VIA further submitted that ASC calculations done by MSEDCL are based on the old tariff applicable at that time when the Petition was submitted to the Commission. Thereafter, the Commission has revised the tariff for FY 2009-10 in August 2009 and hence, the new tariff should be considered for calculation of ABR. VIA submitted that MSEDCL has calculated ABR of Rs. 4.65 per unit for Nagpur Urban Circle, which would be increased by 20% due to revision in tariff.

VIA submitted that industries under Nagpur Urban Circle being subjected to one day staggered load shedding had willingly agreed to contribute Rs. 0.25 per unit. VIA added that though these industries are already burdened due to tariff increase, such industries were ready to contribute Rs. 3.5 Crore as projected by MSEDCL in its Petition. As a result of the above changes, the ASC would be reduced to Rs. 0.16 per unit instead of Rs. 0.25 per unit. VIA requested the Commission to approve the Reliability Charges based on its submissions, i.e., Rs.0.16 per unit for industries facing one day staggered load shedding in Nagpur Urban Circle and Rs.0.27 per unit for all other consumers excluding BPL consumers for Nagpur urban Circle.

The Nagpur Chamber of Commerce accepted the ZLS proposal subject to maximum ASC of Rs. 0.40 per unit for total withdrawal of load shedding. Shri Devendra Phadnavis, MLA and many others also supported the Petition filed by MSEDCL subject to maximum ASC of Rs. 0.20 per unit with zero load shedding for next 12 months. Shri Devendra Phadnavis also stated that the load shedding protocol should be static and not dynamic. Smt Pahade, Shri Sunil Sirsikar, Smt Sumitra Lule, Shri Anjaya Anparthi and many others welcomed the ZLS proposal, but stated that the ASC should be kept to a minimum.

Shri Mohan Sharma submitted that the ASC should be recovered on a pro-rata basis from the residential consumers. He further added that the ASC should also be made applicable to all express feeder consumers. Shri Mohan Sharma suggested that the ASC should be equal to all consumers within Maharashtra.

Shri Mahendra Jichkar pointed out that the ZLS Model would be more beneficial to commercial consumers as compared to residential consumers and suggested 30:70 ASC ratio for residential and commercial consumers. Shri Srinivas Anand requested the Commission to appoint a special auditor to verify the ASC calculations. Shri M. D. Booth submitted that if MSEDCL would successfully reduce its arrears, theft and losses, it would generate sufficient revenue and the concept of ASC would not be required at all.

Shri Regi Lukos requested the Commission to promote renewable energy generation in the State to bridge the demand-supply gap. Shri Amitabh Dharal welcomed the ZLS proposal, however, protested the levy of any additional cost for the same.

Aurangabad

Urja Sahyog welcomed the ZLS proposal for Aurangabad city, but submitted that there was a significant difference between the ASC proposed for Aurangabad city and Nashik city. Urja Sahyog submitted that the load pattern of Aurangabad city and Nashik city are comparable and hence, ASC for both places should also be comparable. Urja Sahyog suggested that the distribution losses of Aurangabad city should be reduced to Nashik city level.

The Marathwada Association of Small Scale Industries & Agriculture agreed for maximum ASC of Rs. 0.25 per unit for proposed ZLS scheme. They added that reduction of distribution losses is the sole responsibility of MSEDCL and the consumers should not be burdened on account of the inefficiency of MSEDCL.

Urja Manch proposed that the same level of ASC should be charged from consumers of all Revenue Division Headquarters towards ensuring ZLS. Further, the consumers with monthly consumption lower than 300 units per month should not be subjected to any ASC. Urja Manch stated that MSEDCL is not serious about reduction of theft and distribution losses.

Nashik

The Institution of Engineers (India) submitted that recently MSEDCL has implemented the revised tariffs w.e.f. August 1, 2009, and any further increase in tariff will have adverse effect on industrial consumers and they will not be competitive in the market. The cost of services or product of industries should not overshoot due to increase in electricity charges. The Institution of Engineers (India) requested the Commission not to accept the proposal of MSEDCL for ensuring ZLS by payment of ASC. They added that MSEDCL may be directed to provide zero load shedding to all its consumers, and suggested below referred measures to meet the additional cost required for procurement of additional power:

- a) Demand Side Management, through installation of capacitors for reducing reactive component of power.
- b) Promotion of CFL and LED lamps.
- c) Use of Star rated appliances.

- d) Metering of all agricultural consumers and undertaking energy audit of rural areas.
- e) Acceleration of theft detection drives.
- f) Reduction of cross-subsidy in accordance with the provisions of the Tariff Policy.
- g) Implementation of Time of Day (ToD) tariff for all LT industrial and commercial consumers to reduce peak demand.
- h) MSEDCL should upgrade its network and carry out periodical preventive maintenance to reduce the technical losses in the system.
- i) MSEDCL should recover old pending arrears from MPECS and other consumers to meet the additional cost for purchase of costly power.

The Institution of Engineers (India) submitted that if the ASC proposal is accepted by the Commission, then MSEDCL should ensure uninterrupted supply to the consumers without any load shedding. In case load shedding is done or there is a supply interruption, MSEDCL should refund the ASC to such consumers at double rate in that particular month.

Shri Satish S. Shah pointed out that the legal opinion submitted by MSEDCL through its Advocate Shri Ravi Prakash is silent on the provisions of Section 62(3) and 62(4) of the EA 2003. Shri Shah added that in the said ZLS proposal, the word Reliability Charge is replaced with ASC, as Reliability Charge is a part of the tariff structure. Shri Shah added that if the ZLS proposal is implemented, the tariff for industrial consumers on non-express feeders (Rs. 4.60 + Rs. 0.49) would be higher than tariff for industrial consumers on express feeders (Rs. 5.05 + nil). Further, the staggering day for the industries would continue, and hence, there would be no additional benefit to the industries.

Shri T.N Agrawal submitted that the supply shortage in Maharashtra ranges from 3,000 MW to 3,500 MW and enquired how the additional power would be made available by MSEDCL when overall power shortage in India is around 13.5%. Shri Agrawal stated that MSEDCL's ZLS proposal is a short-term proposal to get additional tariff hike. In the long term, MSEDCL would not be able to meet the growing demand.

Shri Siddharth Soni, Veej Grahak Samiti, Nasik Industries & Manufacturer's Association (NIMA), and Akhil Bhartiya Grahak Panchayat (Nasik) opposed MSEDCL's proposal in toto and submitted that the Petition filed by MSEDCL is not at all tenable under Section 62(4) of EA 2003. Further, opinion of Advocate Shri Ravi Prakash is irrelevant and

cannot be considered. They highlighted that MSEDCL has not discussed the ZLS proposal with any of the Consumer Representatives or Consumer Organizations.

NIMA submitted there is no concrete assurance about ZLS, whereas, ASC amount would vary every month/quarterly. NIMA requested the Commission to allow Open Access to all consumers to bring competition in the electricity market. Shri Vilas Deole, Shri Venkatesh Murti and many others also objected to the ZLS Petition filed by MSEDCL.

Pune

Prayas submitted that MSEDCL should maintain accountability and transparency in all its operations, viz., estimation of additional charge, estimation of additional power requirement, cost of additional power purchase, estimation of average billing rate, etc. Further, MSEDCL should strictly implement and adhere to the load shedding protocol. MSEDCL should also adopt competitive bidding mechanism for contracting short-term power for at least 2-3 years. Prayas requested the Commission to have a cap on ASC for each region/area.

Prayas suggested that the consumers with monthly consumption lower than 200 units should be exempted from levy of ASC. Further, the industries on express feeder should be included in ASC structure as they should also shoulder this social responsibility. Prayas suggested that quarterly review of load shedding scenario, power purchase cost and ABR should be done to determine ASC variation, if any, and added that if ASC exceeds approved limit, public review should be conducted to verify the fruitfulness of the ZLS model. Prayas also suggested that quarterly public review of MSEDCL's efforts on capacity addition should be done, to verify the contracting process and progress on contracted projects.

Prayas requested the Commission to direct MSEDCL to ensure improvement in supply and service quality to rural areas, automatic meter reading of all feeders, periodic audit/review of feeder load data, tracking progress of single phasing and feeder separation schemes. Prayas submitted that MSEDCL should submit details of power purchase cost and quantum for next phase of reduced load shedding model at district level within a month.

Sajag Nagrik Manch pointed out that the load shedding scenario has changed since filing of the Petition, and hence, the additional power purchase quantum would have to be recalculated and reduced, resulting in reduction in proposed ASC. Sajag Nagrik Manch

submitted that except the continuous process industries, most of the industries work only for 6 days a week with a staggered holiday, however, the ASC has been calculated considering that all industries would work for seven (7) days a week and no effect of staggered holiday has been considered. Sajag Nagrik Manch added that any additional charge levied on commercial and industrial consumers ultimately gets passed on to domestic consumers and if domestic consumers are also charged ASC directly, then it would be a double burden for them and hence, the domestic consumers with consumption less than 200 units per month should be excluded from levy of ASC.

Tata Motors welcomed the ZLS Petition with no ASC proposed for express feeder consumers. Tata Motors pointed out that MSEDCL has considered 98.30% power purchase through Bilateral Agreements and only 1.7% from Energy Exchange for proposed ZLS model, which increases the certainty in terms of power availability and cost. Tata Motors requested the Commission to include MIDC areas in the ZLS proposal.

Tata Motors submitted that as per CEA Reports, there is a total of 1487 MW capacity of Captive Power Plants (1MW and above) within Maharashtra with various industries. Tata Motors submitted that MSEDCL has considered an average purchase rate of Rs.6.75 per unit at State boundary. Due to elimination of T&D losses, it is economical for MSEDCL if any CPP wishes to sell power at the rate of about Rs. 7.70 per unit or below.

Wartsila appreciated the efforts and the end objective set by MSDECL and submitted that MSEDCL should look forward for sustainable power sources on a long-term basis with least cost to consumers. Since it is not practical to design larger central thermal stations to meet the peak load, MSEDCL should set-up natural gas based peaking power plants, which would be beneficial in many terms, viz.:

- Long-term sustainable solution
- Reduced transmission losses, since the generation is located closer to the load centre
- Saving of approx. Rs. 120 Crore per annum
- Low cost of power procurement (Rs.0.85/unit)
- Reduced ASC due to cheaper cost of power (Rs. 0.11/ unit)

Pudumjee Pulp & Paper Mills Ltd. supported the ZLS Petition and submitted that the express feeder consumers located at Thergaon in Pimpri-Chinchwad Municipal Corporation area are a part of prevailing Pune ZLS pattern and requested the

Commission to incorporate Pimpri-Chinchwad Municipal Corporation area in the Divisional Headquarters under ZLS scheme.

Shri Girish Bapat, MLA, BJP, Smt Madhuri Misal, MLA, BJP, Smt Mukta Tilak, P.M.C., Shri Vikas Matkari, P.M.C. opposed the concept of levy of ASC for uninterrupted power supply. Shri Pradeep Bhargava, CII, Shri Shankar Kalmadi and many others submitted that small residential consumers with monthly consumption up to 200 units should be excluded from levy of ASC under proposed ZLS model. Further, there should be cap on ASC.

Dr. Anjali Dharme, College of Engineering, Pune stated that there is a necessity to carry out study of proposed ZLS model and associated ASC.

Navi Mumbai

Shri Ashok Pendse, representing Thane Belapur Industries Association (TBIA) supported the ZLS proposal and submitted that for common consumers, the source of power is immaterial and they are ready to pay reasonable additional cost for uninterrupted power supply. He added that the proposal should be renamed as reduced load shedding instead of zero load shedding.

Shri Ashok Pendse suggested that the Commission and MSEDCL should eliminate the deficiencies in the prevailing ZLS model implemented in Thane-Vashi area. Shri Pendse submitted that load shedding has been in existence since year 2000 and would continue till the year 2012 at least, and hence, the applicability of proposed ZLS model should be 3 years instead of 12 months, else, the ZLS model should continue till new dispensation. Shri Pendse added that the estimated power purchase quantum is based on the present demand-supply gap, and hence, MSEDCL should also purchase additional power when the demand supply gap increases. Further, MSEDCL should occasionally purchase power even on day ahead basis thereby targeting uninterrupted power supply. The higher power purchase cost should be adjusted during annual truing up. Shri Pendse submitted that the proposed ZLS model should achieve three basic targets, viz., demand supply load balance, energy balance and revenue neutrality for MSEDCL.

Dr. S. L. Patil, TBIA also welcomed the ZLS proposal and submitted that growth rate projected by MSEDCL should be 10% to 12%. Dr. S. L. Patil suggested that ASC should be renamed as Regulatory Charges. Further, distribution losses of MIDC feeders are very marginal and the same should be considered while determining the additional cost.

Shri Ponrathnam, Vel Induction Hardening, and Shri Rakhpal Abrol pointed out that the term Load Shedding is not reflected anywhere in the EA 2003 and the Regulations framed by the Commission and suggested that instead of ZLS, MSEDCL should name the proposal as uninterrupted power supply. Shri P. N. Shridhar also opposed the concept of ASC. Many stakeholders submitted that consumers have the right to receive uninterrupted power supply without any additional charge and enquired about the road map to ensure uninterrupted power supply.

Shri Santosh Pachlag, BJP submitted that additional charge should be levied only on the consumers using electricity during periods of load shedding. Ispat Industries Ltd. opposed ASC concept and suggested that MSEDCL should focus on improving its own performance instead of burdening the consumers.

Shri Annasaheb Desai, Maharashtra Veej Kamgar Sangh proposed that ASC amount should be subsidized by the State Government. Further, the whole State should be covered under the proposed ZLS model. Shri Eknath Shinde, MLA opposed the ASC concept and submitted that the present demand supply gap situation has arisen due to MSEDCL's inefficiency and other associated Companies. No new generation capacity has been added in the past 10 years. Shri Eknath Shinde further pointed out that at present, the consumers located in Thane city are paying Rs. 0.43 per unit as Reliability Charge, however, they are still being subjected to daily load shedding of 4 hours.

12. The Commission's observations and ruling on the above issues are as under:

- a) As regards the admissibility of MSEDCL's Petition to ensure ZLS in selected regions in the State, with the cost being recovered by levying additional charges, the Commission has relied on Section 62 (3) of the EA 2003 and admitted the Petition. .
- b) In view of the positive response to MSEDCL's proposal by the affected consumers in the Amravati region, Nagpur region, Aurangabad region, Pune Region, Navi Mumbai, and Thane Region (including Mulund and, Bhandup), the Commission has approved the Zero Load Shedding scheme for these regions as proposed by MSEDCL, with certain modifications, which are detailed in the subsequent paragraphs on assumptions and computation of additional charges.
- c) As regards Nashik region, in view of the objections and the rejection of MSEDCL's proposal by the majority of the consumers, the Commission has not

approved MSEDCL's proposal for introducing Zero Load Shedding for Nashik region.

- d) The observation regarding increase in the ABR due to the tariff revision approved by the Commission in the Tariff Order for MSEDCL for FY 2009-10, which has been implemented by MSEDCL w.e.f. August 2009 is correct, and the Commission has accordingly considered the increase in the ABR while determining the Reliability Charges.
- e) The issue of generation stations being located in Vidarbha and the need for providing special benefits to Vidarbha region on this account have already been addressed by the Commission in several Orders, and are not being repeated here. The Commission has already ruled that the generation sources as well as the revenue sources are all pooled together and are not being considered to provide special treatment to any region.
- f) In accordance with the principles approved by the Commission, the additional expense on account of additional power purchase to mitigate load shedding for a specific region has to be internalised in that region, and the consumers in the region who are benefited from the reduction/elimination of load shedding, have to pay so that the MSEDCL is able to recover the additional expense.
- g) The Commission has retained the name of 'Reliability Charges' for the additional charges to be levied to alleviate load shedding in the identified regions, rather than the proposed name of 'Additional Supply Charges', in view of the different connotation of Additional Supply Charges, which were introduced by the Commission a few years ago under a different approach. Moreover, through a separate Order, the Commission has approved the ASC refund to selected consumer categories, and having the same name is likely to create unwarranted confusion in the minds of the consumers.
- h) MSEDCL should ensure that to the extent possible, load shedding is not undertaken in areas where the ZLS scheme is implemented, since the consumers are paying additional charges in the form of Reliability Charges for every unit of consumption.
- i) As regards the observations regarding facilitation of Open Access by MSEDCL and MSETCL, the same are not within the scope of the Petitions filed by MSEDCL for implementation of zero load shedding schemes and hence, are not being dealt with. However, MSEDCL and MSETCL should ensure that they act at all times in accordance with the EA 2003 and Regulations framed by the Commission in this regard, and ensure compliance both in letter and spirit.

- j) As regards the suggestion that transmission losses should not be considered for assessing the MW and MU requirement for Nagpur region, in view of the location of the generation sources in the region, the Commission is of the view that since under this Proposal, no specific generation sources have been identified, it is incorrect to state that Nagpur's additional requirement would come from Vidarbha itself. Hence, the Commission has considered transmission losses for assessing the MW and MU requirement for Nagpur region, in a consistent manner for all regions.
- k) As regards the voluntary contribution of 25 paise/kWh by MIDC industries, who are subjected to one staggered day of load shedding, the Commission is of the view that while the voluntary offer is laudable, the same is not practically implementable, since MSEDCL will be unable to determine whether any industrial consumer has actually drawn full load on the staggered day of load shedding, as compared to the commitment to draw only for lighting load upto 10% of normal power requirement. Since the MIDC industrial consumers have indicated that they would like to be kept out of the ZLS scheme and are willing to continue being subjected to one day of staggered load shedding, the Commission has accepted the same, and has not included the consumption and revenue (@ 25 paise/kWh) of such consumers for computing the additional charges.
- l) The ZLS scheme has not been made applicable to consumers connected on express feeders, in accordance with MSEDCL's proposal in this regard, and since these consumers are already subjected to a higher tariff on account of the assurance of uninterrupted power supply.
- m) By its very design, such schemes have to be designed to cater to the specific needs of each region and are linked to the consumer mix, distribution losses, load requirement, etc., and hence, the suggestion that the additional charges should be levied uniformly across the State does not have merit.
- n) The suggestions regarding maintaining accountability and transparency in all activities, viz., estimation of additional charge, estimation of additional power requirement, cost of additional power purchase, estimation of average billing rate, etc., have merit and the Commission directs MSEDCL to ensure the same. Further, MSEDCL should strictly implement and adhere to the load shedding protocol. MSEDCL should also adopt competitive bidding mechanism for contracting medium-term power for at least 2-3 years, rather than relying on short-term day ahead power for such schemes.
- o) MSEDCL should also actively try to improve the additionality of supply capacity, by tapping surplus captive generation sources.

13. The Commission's detailed assumptions and computation of Reliability Charges for each of these regions is given below:

- a) The detailed month-wise and aggregated computation of Reliability Charges for Amravati Division, Nagpur Division, Aurangabad Division, Pune Division, Thane Division, and Navi Mumbai Division, is given in **Annexures 1 to 6** to this Order
- b) General assumptions, applicable for all regions:
 - i. The period of model has been considered as 12 months, from December 1, 2009 to November 30, 2010
 - i. The Load Shedding protocol has been considered as per Scenario II of the load shedding protocol approved by the Commission, as submitted in MSEDCL's revised Petition dated July 28, 2009. In case there is any variation in the demand-supply gap, MSEDCL shall procure further additional power for these areas to ensure zero load shedding, and the impact of the same should be adjusted by MSEDCL at the time of quarterly review based on audit of expenses and revenue.
 - ii. While computing the MW requirement, MSEDCL has erroneously considered intra-State transmission losses twice, thus leading to over-estimation of MW and MU requirement. The Commission has considered the intra-State transmission losses only once, to assess the quantum of MW support required.
 - iii. The power purchase has been considered for 12 hours daily as proposed by MSEDCL, and MSEDCL has to manage the demand and supply in such a manner that the MW and MU requirement is matched, and the other regions, who are not benefitting from the ZLS scheme, are not burdened on account of costly power purchase for selected regions.
 - iv. The effective days of load shedding have been considered as 80% based on MSEDCL's submission in this regard, for assessing the MWh requirement.
 - v. The power purchase rate for the purpose of computation of Reliability Charges has been considered at Rs. 6.75 per unit based on the average price of traded power purchased by MSEDCL in FY 2008-09, as proposed by MSEDCL. The Scheme would be viable for both, MSEDCL as well as the consumers, only if the power purchase rates remain near-about the assumed rate. The Commission, therefore, directs MSEDCL to immediately get its power procurement contracts for the proposed

requirement for the period of operation of the Scheme. In the interim, MSEDCL may procure power on daily or any other basis, and in case of any variation in the power purchase prices, MSEDCL will be able to pass through the difference (positive or negative) through the quarterly truing up mechanism, based on audited numbers. The Commission has not imposed any cap on the power procurement rates.

- vi. The following consumer categories have been exempted from the levy of Additional Supply Charge, primarily because these categories are not benefiting additionally on account of the introducing the ZLS scheme, viz.,
 - HT Industries connected on Express feeders;
 - PWW connected on Express feeders;
 - Railway traction;
 - Below Poverty Line (BPL) consumers,
 - Agriculture consumers.
- vii. The growth rate for consumption has been assumed at 5.23%, as proposed by MSEDCL, and in accordance with the CAGR of 5.23% in sales considered by the Commission in the Tariff Order dated August 17, 2009, on MSEDCL's Annual Performance Review (APR) Petition for FY 2008-09 (Case No. 116 of 2008). The actual growth in area-wise sales is likely to be different, and will have to be addressed at the time of quarterly truing up;
- viii. The distribution losses for each ZLS area have been considered as submitted by MSEDCL, based on the actual distribution losses in FY 2008-09.
- ix. MSEDCL had considered the Average Billing Rate (ABR) on the basis of the actual demand and the billed units for each region in FY 2008-09. However, the Commission has since issued the Tariff Order for MSEDCL for FY 2009-10, which is effective from August 2009, wherein the average tariff increase is around 4.2%. Depending on the consumption mix in each ZLS area, the increase in the ABR would vary. For the purpose of this Order, the Commission has considered a 4.2% increase in ABR for all ZLS areas, while computing the additional revenue from the increased sales due to introduction of ZLS scheme. However, based on the actual audited sales and revenue, MSEDCL should pass through the difference (positive or negative) through the quarterly truing up mechanism.

x. As explained earlier, the Commission has assumed that the additional power will be procured for all the 12 months of the year, and the Reliability Charges will also be levied throughout the year.

c) Region-specific assumptions:

i. For Nagpur and Amravati regions, the consumption of industrial consumers having one-day staggered load shedding has been excluded from the requirement, and such consumers would continue to face the staggered day of load shedding.

d) The computation of Reliability Charges has been done in accordance with the standard methodology adopted by the Commission and elaborated in the Commission's Order dated June 20, 2008 in Case No 5 of 2008, and have been given in **Annexures 1 to 6** of this Order, and summarised in the Table below:

Particulars	Units	Pune	Navi Mumbai	Thane	Aurangabad	Nagpur	Amravati
Power purchase rate at State Boundary	Rs./kWh	6.75	6.75	6.75	6.75	6.75	6.75
Power requirement in MW	MW	128.3	76.8	65.0	52.0	53.8	11.8
Hours usage	Hrs	12	12	12	12	12	12
Hours considering 80% effective load shedding	Hrs	80%	80%	80%	80%	80%	80%
MWh requirement	MWh	1232	737	624	499	517	113
MU requirement per day	MU	1.23	0.74	0.62	0.50	0.52	0.11
Annual Consumption in MU excluding Express feeder and BPL, considering CAGR	MU	4315.28	2197.16	1740.26	817.94	1087.45	204.21
Support at Dist end in MU	MU	449.52	268.94	227.62	182.09	188.55	41.28
Distribution loss	%	10%	10%	15%	30%	22%	28%
Distribution loss	MU	44.95	26.89	34.14	54.63	41.48	11.56
Additional sales after accounting dist losses	MU	404.57	242.04	193.48	127.47	147.07	29.72
Net units reqd for sale to consumers	MU	4719.85	2439.21	1933.74	945.41	1234.51	233.93
Add transmission loss of 4.85%	%	4.85%	4.85%	4.85%	4.85%	4.85%	4.85%
MW requirement at T\leftrightarrowD interface (add trans. loss of 4.85%)	MW	134.83	80.66	68.27	54.62	56.55	12.38
Annual support after losses in MU	MU	472.43	282.65	239.22	191.37	198.16	43.39
Power Purchase cost	Rs.Cr.	318.89	190.79	161.47	129.18	133.76	29.29
Average Billing Rate	Rs./kWh	5.48	5.55	5.51	4.58	4.85	4.44
Reduction in purchase cost due to additional sale @ Rs/unit	Rs.Cr	221.85	134.44	106.65	58.40	71.31	13.21

Particulars	Units	Pune	Navi Mumbai	Thane	Aurangabad	Nagpur	Amravati
Actual burden of power purchase for mitigating load shedding	Rs.Cr	97.04	56.35	54.82	70.77	62.44	16.07
Reliability Charge per unit	Rs./kWh	0.21	0.23	0.28	0.75	0.51	0.69

14. In the above summary of MW and MU requirement and the computation of Reliability Charges, it is important to note the following reasons for the variation in Reliability Charges between various ZLS areas, as well as the reasons for the variation between Reliability Charges approved by the Commission and that proposed by MSEDCL in its Petition:

- a) The Reliability Charges varies from one ZLS area to another depending on the following key aspects:
 - Distribution loss in the ZLS area, which impacts both the overall requirement of MW and MU to mitigate load shedding, as well as the additional revenue due to additional sales. Higher the distribution loss of the ZLS area, the corresponding MW and MU requirement will be higher, the additional revenue earned through additional sales will be lower, and the Reliability Charges will be higher. As a result, the ZLS areas of Pune, Navi Mumbai, and Thane, which have lower distribution losses, are required to pay lower Reliability Charges, and the ZLS areas of Aurangabad, Nagpur and Amravati, which have higher distribution losses, are required to pay higher Reliability Charges, to offset the cost of additional power purchase.
 - The Average Billing Rate (ABR), which impacts the revenue from additional sales. Higher the ABR of the ZLS area, the corresponding additional revenue earned through additional sales will be higher, and the Reliability Charges will be lower. As a result, the ZLS areas of Pune, Navi Mumbai, and Thane, which have higher ABR, are required to pay lower Reliability Charges, and the ZLS areas of Aurangabad, Nagpur and Amravati, which have lower ABR, are required to pay higher Reliability Charges, to offset the cost of additional power purchase.

- b) The Reliability Charges approved by the Commission is different from that proposed by MSEDCL in its Petition, on account of the following reasons:
 - The Reliability Charges approved for Pune, Navi Mumbai and Thane, is lower than that proposed by MSEDCL, on account of the fact that the MW and MU support has been reduced due to removal of the double-accounting of the

intra-State transmission losses, and higher ABR considered by the Commission, and all other assumptions being retained as proposed by MSEDCL.

- The Reliability Charges approved for Aurangabad, Nagpur, and Amravati is higher than that proposed by MSEDCL, on account of the fact that the additional power purchase has been assumed for all the 12 months of the year, as against MSEDCL's proposal to procure additional power for only 9 months of the year, which has only been partly off-set by reduction in the MW and MU support, due to removal of the double-accounting of the intra-State transmission losses, and higher ABR considered by the Commission, and all other assumptions have been retained as proposed by MSEDCL. Also, in Nagpur and Amravati, industries with one day of staggered load shedding have been excluded from the ZLS scheme, as a result of which, the Reliability Charges payable by other consumers is higher. Also, in Nagpur, the voluntary offer by industries facing one day staggered load shedding to pay Rs. 0.25 per kWh, has not been considered on account of reasons explained above.

15. MSEDCL should undertake reconciliation between actuals and the basis on which the above Reliability Charges have been determined, on a quarterly basis, and ensure that the recovery of Reliability Charges on actual basis matches the expenditure on additional power procurement. Truing up would be necessitated on account of the following changes in the ground realities, inter-alia:

- a) The periodic revision in the load shedding protocol and the actual load shedding would depend on the system conditions, which will have an impact on the additional power purchase requirement.
- b) The actual power purchase cost, actual category-wise sales and hence, actual recovery through Reliability Charges would be different from that estimated in this Order.
- c) The category-wise tariffs have been revised in the above-referred Tariff Order with effect from August 2009, and hence, the additional revenue would undergo a change.
- d) The above reconciliation should be got audited by a Certified third-party Chartered Accountant (certified by Institute of Chartered Accountants of India - ICAI) from outside the local area to be appointed by MSEDCL. The difference between the cost and recovery under this Scheme should be passed through to the identified consumer categories of the respective ZLS areas, after the above reconciliation and third-party audit, on a quarterly basis, as Variation in

- e) Reliability Charges. The audit Report submitted by the third-party auditor should be submitted to the Commission on a quarterly basis, along with the details of the variation in Reliability Charges passed through to the consumers, on a post-facto basis. It is clarified that the variation can be positive or negative, and should be passed through to consumers on a quarterly basis, irrespective of whether it is positive or negative.

16. The Commission also observes that such ZLS schemes are only short-term solutions, and should not be considered as a long-term solution for the prevailing and expected demand-supply gap. Such schemes are also difficult to administer and regulate. Past experience shows consumer dissatisfaction at non-reconciliation of charges recovered, costs incurred, etc. MSEDCL should contract for the desired quantum of power, based on a scientific assessment of the demand and supply over the next few years, through a judicious mix of long-term contracts, medium-term contacts, and short-term contracts.

With the above, the Petition filed by MSEDCL in Case No. 31 of 2009 stands disposed of.

Sd/-
(V.L. Sonavane)
Member

Sd/-
(S.B. Kulkarni)
Member

Sd/-
(V.P.Raja)
Chairman



(Sanjay Sethi)
Secretary, MERC

Annexure 1: Computation of Reliability Charges for Pune ZLS area

Particulars	Units	Assumptions	Dec-09	Jan-10	Feb-10	Mar-10	Apr-10	May-10	Jun-10	Jul-10	Aug-10	Sep-10	Oct-10	Nov-10	Total
Days in the month			31	31	28	31	30	31	30	31	31	30	31	30	365
Power purchase rate at State Boundary	Rs./kWh	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75
Energy requirement in MW	MW	128	128	128	128	128	128	128	128	128	128	128	128	128	128
Hours usage	Hrs	12	12	12	12	12	12	12	12	12	12	12	12	12	12
Hours considering 80% effective load shedding	Hrs	80%	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60
MWh requirement	MWh		1232	1232	1232	1232	1232	1232	1232	1232	1232	1232	1232	1232	1232
MU requirement per day	MU		1.23	1.23	1.23	1.23	1.23	1.23	1.23	1.23	1.23	1.23	1.23	1.23	1.23
Consumption in MU excluding Express feeder and BPL, considering CAGR	MU	360	360	360	360	360	360	360	360	360	360	360	360	360	4315
Monthly support at Dist end in MU	MU		38.18	38.18	34.48	38.18	36.95	38.18	36.95	38.18	38.18	36.95	38.18	36.95	450
Distribution loss	MU	10%	3.82	3.82	3.45	3.82	3.69	3.82	3.69	3.82	3.82	3.69	3.82	3.69	45
Additional sales after accounting dist losses	MU		34.36	34.36	31.04	34.36	33.25	34.36	33.25	34.36	34.36	33.25	34.36	33.25	405
Net units reqd for sale to consumers	MU		393.97	393.97	390.64	393.97	392.86	393.97	392.86	393.97	393.97	392.86	393.97	392.86	4719.85
MW requirement at T<->D interface (add trans. loss of 4.85%)	MW	4.85%	134.83	134.83	134.83	134.83	134.83	134.83	134.83	134.83	134.83	134.83	134.83	134.83	
Monthly support after losses in MU	MU		40.12	40.12	36.24	40.12	38.83	40.12	38.83	40.12	40.12	38.83	40.12	38.83	472.43
Power Purchase cost	Rs.Cr.		27.08	27.08	24.46	27.08	26.21	27.08	26.21	27.08	27.08	26.21	27.08	26.21	318.89
Reduction in purchase cost due to additional sale @ Rs/unit	Rs.Cr	5.48	18.84	18.84	17.02	18.84	18.23	18.84	18.23	18.84	18.84	18.23	18.84	18.23	221.85
Actual burden of power purchase for mitigating load shedding	Rs.Cr		8.24	8.24	7.44	8.24	7.98	8.24	7.98	8.24	8.24	7.98	8.24	7.98	97.04
Reliability Charge per unit	Rs./kWh		0.21	0.21	0.19	0.21	0.20	0.21	0.20	0.21	0.21	0.20	0.21	0.20	0.21



Annexure 2: Computation of Reliability Charges for Navi Mumbai ZLS area

Particulars	Units	Assumptions	Dec-09	Jan-10	Feb-10	Mar-10	Apr-10	May-10	Jun-10	Jul-10	Aug-10	Sep-10	Oct-10	Nov-10	Total
Days in the month			31	31	28	31	30	31	30	31	31	30	31	30	365
Power purchase rate at State Boundary	Rs./kWh	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75
Energy requirement in MW	MW	77	77	77	77	77	77	77	77	77	77	77	77	77	77
Hours usage	Hrs	12	12	12	12	12	12	12	12	12	12	12	12	12	12
Hours considering 80% effective load shedding	Hrs	80%	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	
MWh requirement	MWh		737	737	737	737	737	737	737	737	737	737	737	737	
MU requirement per day	MU		0.74	0.74	0.74	0.74	0.74	0.74	0.74	0.74	0.74	0.74	0.74	0.74	
Consumption in MU excluding Express feeder and BPL, considering CAGR	MU	183	183	183	183	183	183	183	183	183	183	183	183	183	2197
Monthly support at Dist end in MU	MU		22.84	22.84	20.63	22.84	22.10	22.84	22.10	22.84	22.84	22.10	22.84	22.10	269
Distribution loss	MU	10%	2.28	2.28	2.06	2.28	2.21	2.28	2.21	2.28	2.28	2.21	2.28	2.21	27
Additional sales after accounting dist losses	MU		20.56	20.56	18.57	20.56	19.89	20.56	19.89	20.56	20.56	19.89	20.56	19.89	242
Net units reqd for sale to consumers	MU		203.65	203.65	201.66	203.65	202.99	203.65	202.99	203.65	203.65	202.99	203.65	202.99	2439.21
MW requirement at T<->D interface (add trans. loss of 4.85%)	MW	4.85%	80.66	80.66	80.66	80.66	80.66	80.66	80.66	80.66	80.66	80.66	80.66	80.66	
Monthly support after losses in MU	MU		24.01	24.01	21.68	24.01	23.23	24.01	23.23	24.01	24.01	23.23	24.01	23.23	282.65
Power Purchase cost	Rs.Cr.		16.20	16.20	14.64	16.20	15.68	16.20	15.68	16.20	16.20	15.68	16.20	15.68	190.79
Reduction in purchase cost due to additional sale @ Rs/unit	Rs.Cr	5.55	11.42	11.42	10.31	11.42	11.05	11.42	11.05	11.42	11.42	11.05	11.42	11.05	134.44
Actual burden of power purchase for mitigating load shedding	Rs.Cr		4.79	4.79	4.32	4.79	4.63	4.79	4.63	4.79	4.79	4.63	4.79	4.63	56.35
Reliability Charge per unit	Rs./kWh		0.24	0.24	0.21	0.24	0.23	0.24	0.23	0.24	0.24	0.23	0.24	0.23	0.23



Annexure 3: Computation of Reliability Charges for Thane ZLS area

Particulars	Units	Assumptions	Dec-09	Jan-10	Feb-10	Mar-10	Apr-10	May-10	Jun-10	Jul-10	Aug-10	Sep-10	Oct-10	Nov-10	Total
Days in the month			31	31	28	31	30	31	30	31	31	30	31	30	365
Power purchase rate at State Boundary	Rs./kWh	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75
Energy requirement in MW	MW	65	65	65	65	65	65	65	65	65	65	65	65	65	65
Hours usage	Hrs	12	12	12	12	12	12	12	12	12	12	12	12	12	12
Hours considering 80% effective load shedding	Hrs	80%	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60
MWh requirement	MWh		624	624	624	624	624	624	624	624	624	624	624	624	624
MU requirement per day	MU		0.62	0.62	0.62	0.62	0.62	0.62	0.62	0.62	0.62	0.62	0.62	0.62	0.62
Consumption in MU excluding Express feeder and BPL, considering CAGR	MU	145	145	145	145	145	145	145	145	145	145	145	145	145	1740
Monthly support at Dist end in MU	MU		19.33	19.33	17.46	19.33	18.71	19.33	18.71	19.33	19.33	18.71	19.33	18.71	228
Distribution loss	MU	15%	2.90	2.90	2.62	2.90	2.81	2.90	2.81	2.90	2.90	2.81	2.90	2.81	34
Additional sales after accounting dist losses	MU		16.43	16.43	14.84	16.43	15.90	16.43	15.90	16.43	16.43	15.90	16.43	15.90	193
Net units reqd for sale to consumers	MU		161.45	161.45	159.86	161.45	160.92	161.45	160.92	161.45	161.45	160.92	161.45	160.92	1933.74
MW requirement at T<->D interface (add trans. loss of 4.85%)	MW	4.85%	68.27	68.27	68.27	68.27	68.27	68.27	68.27	68.27	68.27	68.27	68.27	68.27	68.27
Monthly support after losses in MU	MU		20.32	20.32	18.35	20.32	19.66	20.32	19.66	20.32	20.32	19.66	20.32	19.66	239.22
Power Purchase cost	Rs.Cr.		13.71	13.71	12.39	13.71	13.27	13.71	13.27	13.71	13.71	13.27	13.71	13.27	161.47
Reduction in purchase cost due to additional sale @ Rs/unit	Rs.Cr.	5.51	9.06	9.06	8.18	9.06	8.77	9.06	8.77	9.06	9.06	8.77	9.06	8.77	106.65
Actual burden of power purchase for mitigating load shedding	Rs.Cr.		4.66	4.66	4.21	4.66	4.51	4.66	4.51	4.66	4.66	4.51	4.66	4.51	54.82
Reliability Charge per unit	Rs./kWh		0.29	0.29	0.26	0.29	0.28	0.29	0.28	0.29	0.29	0.28	0.29	0.28	0.28

Annexure 4: Computation of Reliability Charges for Aurangabad ZLS area

Particulars	Units	Assumptions	Dec-09	Jan-10	Feb-10	Mar-10	Apr-10	May-10	Jun-10	Jul-10	Aug-10	Sep-10	Oct-10	Nov-10	Total
Days in the month			31	31	28	31	30	31	30	31	31	30	31	30	365
Power purchase rate at State Boundary	Rs./kWh	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75
Energy requirement in MW	MW	52	52	52	52	52	52	52	52	52	52	52	52	52	52
Hours usage	Hrs	12	12	12	12	12	12	12	12	12	12	12	12	12	12
Hours considering 80% effective load shedding	Hrs	80%	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	
MWh requirement	MWh		499	499	499	499	499	499	499	499	499	499	499	499	
MU requirement per day	MU		0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	
Consumption in MU excluding Express feeder and BPL, considering CAGR	MU	68	68	68	68	68	68	68	68	68	68	68	68	68	818
Monthly support at Dist end in MU	MU		15.47	15.47	13.97	15.47	14.97	15.47	14.97	15.47	15.47	14.97	15.47	14.97	182
Distribution loss	MU	30%	4.64	4.64	4.19	4.64	4.49	4.64	4.49	4.64	4.64	4.49	4.64	4.49	55
Additional sales after accounting dist losses	MU		10.83	10.83	9.78	10.83	10.48	10.83	10.48	10.83	10.83	10.48	10.83	10.48	127
Net units reqd for sale to consumers	MU		78.99	78.99	77.94	78.99	78.64	78.99	78.64	78.99	78.99	78.64	78.99	78.64	945.41
MW requirement at T<->D interface (add trans. loss of 4.85%)	MW	4.85%	54.62	54.62	54.62	54.62	54.62	54.62	54.62	54.62	54.62	54.62	54.62	54.62	
Monthly support after losses in MU	MU		16.25	16.25	14.68	16.25	15.73	16.25	15.73	16.25	16.25	15.73	16.25	15.73	191.37
Power Purchase cost	Rs.Cr.		10.97	10.97	9.91	10.97	10.62	10.97	10.62	10.97	10.97	10.62	10.97	10.62	129.18
Reduction in purchase cost due to additional sale @ Rs/unit	Rs.Cr.	4.58	4.96	4.96	4.48	4.96	4.80	4.96	4.80	4.96	4.96	4.80	4.96	4.80	58.40
Actual burden of power purchase for mitigating load shedding	Rs.Cr.		6.01	6.01	5.43	6.01	5.82	6.01	5.82	6.01	6.01	5.82	6.01	5.82	70.77
Reliability Charge per unit	Rs./kWh		0.76	0.76	0.70	0.76	0.74	0.76	0.74	0.76	0.76	0.74	0.76	0.74	0.75



Annexure 5: Computation of Reliability Charges for Nagpur ZLS area

Particulars	Units	Assumptions	Dec-09	Jan-10	Feb-10	Mar-10	Apr-10	May-10	Jun-10	Jul-10	Aug-10	Sep-10	Oct-10	Nov-10	Total
Days in the month			31	31	28	31	30	31	30	31	31	30	31	30	365
Power purchase rate at State Boundary	Rs./kWh	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75
Energy requirement in MW	MW	54	54	54	54	54	54	54	54	54	54	54	54	54	54
Hours usage	Hrs	12	12	12	12	12	12	12	12	12	12	12	12	12	12
Hours considering 80% effective load shedding	Hrs	80%	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	
MWh requirement	MWh		517	517	517	517	517	517	517	517	517	517	517	517	
MU requirement per day	MU		0.52	0.52	0.52	0.52	0.52	0.52	0.52	0.52	0.52	0.52	0.52	0.52	
Consumption in MU excluding Express feeder and BPL, considering CAGR	MU	91	91	91	91	91	91	91	91	91	91	91	91	91	1087
Monthly support at Dist end in MU	MU		16.01	16.01	14.46	16.01	15.50	16.01	15.50	16.01	16.01	15.50	16.01	15.50	189
Distribution loss	MU	22%	3.52	3.52	3.18	3.52	3.41	3.52	3.41	3.52	3.52	3.41	3.52	3.41	41
Additional sales after accounting dist losses	MU		12.49	12.49	11.28	12.49	12.09	12.49	12.09	12.49	12.49	12.09	12.49	12.09	147
Net units reqd for sale to consumers	MU		103.11	103.11	101.90	103.11	102.71	103.11	102.71	103.11	103.11	102.71	103.11	102.71	1234.51
MW requirement at T<=>D interface (add trans. loss of 4.85%)	MW	4.85%	56.55	56.55	56.55	56.55	56.55	56.55	56.55	56.55	56.55	56.55	56.55	56.55	
Monthly support after losses in MU	MU		16.83	16.83	15.20	16.83	16.29	16.83	16.29	16.83	16.83	16.29	16.83	16.29	198.16
Power Purchase cost	Rs.Cr.		11.36	11.36	10.26	11.36	10.99	11.36	10.99	11.36	11.36	10.99	11.36	10.99	133.76
Reduction in purchase cost due to additional sale @ Rs/unit	Rs.Cr.	4.85	6.06	6.06	5.47	6.06	5.86	6.06	5.86	6.06	6.06	5.86	6.06	5.86	71.31
Actual burden of power purchase for mitigating load shedding	Rs.Cr.		5.30	5.30	4.79	5.30	5.13	5.30	5.13	5.30	5.30	5.13	5.30	5.13	62.44
Reliability Charge per unit	Rs./kWh		0.51	0.51	0.47	0.51	0.50	0.51	0.50	0.51	0.51	0.50	0.51	0.50	0.51

Annexure 6: Computation of Reliability Charges for Amravati ZLS area

Particulars	Units	Assumptions	Dec-09	Jan-10	Feb-10	Mar-10	Apr-10	May-10	Jun-10	Jul-10	Aug-10	Sep-10	Oct-10	Nov-10	Total
Days in the month			31	31	28	31	30	31	30	31	31	30	31	30	365
Power purchase rate at State Boundary	Rs./kWh	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75	6.75
Energy requirement in MW	MW	12	12	12	12	12	12	12	12	12	12	12	12	12	12
Hours usage	Hrs	12	12	12	12	12	12	12	12	12	12	12	12	12	12
Hours considering 80% effective load shedding	Hrs	80%	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	
MWh requirement	MWh		113	113	113	113	113	113	113	113	113	113	113	113	
MU requirement per day	MU		0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11	
Consumption in MU excluding Express feeder and BPL, considering CAGR	MU	17	17	17	17	17	17	17	17	17	17	17	17	17	204
Monthly support at Dist end in MU	MU		3.51	3.51	3.17	3.51	3.39	3.51	3.39	3.51	3.51	3.39	3.51	3.39	41
Distribution loss	MU	28%	0.98	0.98	0.89	0.98	0.95	0.98	0.95	0.98	0.98	0.95	0.98	0.95	12
Additional sales after accounting dist losses	MU		2.52	2.52	2.28	2.52	2.44	2.52	2.44	2.52	2.52	2.44	2.52	2.44	30
Net units reqd for sale to consumers	MU		19.54	19.54	19.30	19.54	19.46	19.54	19.46	19.54	19.54	19.46	19.54	19.46	233.93
MW requirement at T<->D interface (add trans. loss of 4.85%)	MW	4.85%	12.38	12.38	12.38	12.38	12.38	12.38	12.38	12.38	12.38	12.38	12.38	12.38	
Monthly support after losses in MU	MU		3.68	3.68	3.33	3.68	3.57	3.68	3.57	3.68	3.68	3.57	3.68	3.57	43.39
Power Purchase cost	Rs.Cr.		2.49	2.49	2.25	2.49	2.41	2.49	2.41	2.49	2.49	2.41	2.49	2.41	29.29
Reduction in purchase cost due to additional sale @ Rs/unit	Rs.Cr.	4.44	1.12	1.12	1.01	1.12	1.09	1.12	1.09	1.12	1.12	1.09	1.12	1.09	13.21
Actual burden of power purchase for mitigating load shedding	Rs.Cr.		1.37	1.37	1.23	1.37	1.32	1.37	1.32	1.37	1.37	1.32	1.37	1.32	16.07
Reliability Charge per unit	Rs./kWh		0.70	0.70	0.64	0.70	0.68	0.70	0.68	0.70	0.70	0.68	0.70	0.68	0.69



Annexure 7

List of persons who participated during the Public Hearings at six locations in the State of Maharashtra

AMRAVATI DIVISION

S.No.	Name of the Objector	Organisation/Company
[A]	Consumer Representative u/s. 26 of the ERC Act, 1998	
1	Shri Shantanu Dixit	Prayas Energy Group
2	Dr. Ashok Pendse	Mumbai Grahak Panchayat
3	Dr. S.L. Patil	Thane Belapur Industries Association
4	Shri R.B. Goenka	Vidarbha Industries Association
[B]	Objections / Suggestions	
5	Shri Girish Deshmukh	BJP
6	MIDC Industrial Association,	
7	Shri Chandrasen O. Wankhede	
8	Shri Purushottam G. Bajaj	

NAGPUR DIVISION

S.No.	Name of the Objector	Organisation/Company
[A]	Consumer Representative u/s. 26 of the ERC Act, 1998	
1	Shri Shantanu Dixit	Prayas Energy Group
2	Dr. Ashok Pendse	Mumbai Grahak Panchayat
3	Dr. S.L. Patil	Thane Belapur Industries Association
4	Shri R.B. Goenka	Vidarbha Industries Association
[B]	Objections / Suggestions	
5	Shri Girish Deshmukh	BJP
6	Smt. Beena John	
7	Smt. Sakshi Tiwari	
8	Shri Nikhil Trivedi	
9	Shri Baban Trivedi	
10	Shri Ashok Santoshrao Gode	
11	The Nagpur Chamber of Commerce Ltd	
12	Grahak Panchayat-Nagpur	
13	Prof. S.A. Gaidhane	

AURANGABAD DIVISION

S.No.	Name of the Objector	Organisation/Company
[A]	Consumer Representative u/s. 26 of the ERC Act, 1998	
1	Shri Shantanu Dixit	Prayas Energy Group
2	Dr. Ashok Pendse	Mumbai Grahak Panchayat
3	Dr. S.L. Patil	Thane Belapur Industries Association
4	Shri R.B. Goenka	Vidarbha Industries Association
[B]	Objections / Suggestions	
5	Urja Sahayog	
6	Akhil Bhartiya Grahak Panchayat	
7	Marathwada Association of Small Scale Industries & Agriculture	
8	Swabhimani Sena	

NASHIK DIVISION

S.No.	Name of the Objector	Organisation/Company
[A]	Consumer Representative u/s. 26 of the ERC Act, 1998	
1	Shri Shantanu Dixit	Prayas Energy Group
2	Dr. Ashok Pendse	Mumbai Grahak Panchayat
3	Dr. S.L. Patil	Thane Belapur Industries Association
4	Shri R.B. Goenka	Vidarbha Industries Association
[B]	Objections / Suggestions	
5	Shri Satish Shah	
6	Global Packaging Industries	
7	Nashik Industries & Manufacturer's Association (NIMA)	
8	Akhil Bhartiya Grahak Parishad	

PUNE DIVISION

S.No.	Name of the Objector	Organisation/Company
[A]	Consumer Representative u/s. 26 of the ERC Act, 1998	
1	Shri Shantanu Dixit	Prayas Energy Group
2	Dr. Ashok Pendse	Mumbai Grahak Panchayat
3	Dr. S.L. Patil	Thane Belapur Industries Association
4	Shri R.B. Goenka	Vidarbha Industries Association
[B]	Objections / Suggestions	
5	Kisaan Kranti Samiti	
6	Bharat Forge Ltd	
7	Wartsila India Limited	
8	Shri S.D. Damle	
9	Tata Motors Ltd	
10	Pudumjee Pulp & Paper Mills Ltd.	
11	Kalyani Carpenter Spl. Steel Ltd.	
12	Shri Vivek Velankar	
13	Confederation of Indian Industry	

NAVI MUMBAI DIVISION

S.No.	Name of the Objector	Organisation/Company
[A]	Consumer Representative u/s. 26 of the ERC Act, 1998	
1	Shri Shantanu Dixit	Prayas Energy Group
2	Dr. Ashok Pendse	Mumbai Grahak Panchayat
3	Dr. S.L. Patil	Thane Belapur Industries Association
4	Shri R.B. Goenka	Vidarbha Industries Association
[B]	Objections / Suggestions	
5	Shri Eknath S. Shinde	
6	Vel Induction Hardenings	
7	Wartsila India Ltd	
8	Navi Mumbai Mall Owners Welfare Association	
9	Tirthraj Apmt. Owners Association	