

BEFORE THE HON'BLE MEGHALAYA STATE ELECTRICITY REGULATORY COMMISSION

FILE/ PETITION NO 22 OF 2023

IN THE MATTER OF

ADDITIONAL SUBMISSION AGAINST PETITION FOR APPROVAL OF BUSINESS PLAN FOR THE CONTROL PERIOD FY 2024-25 TO FY 2026-27 OF THE MEGHALAYA POWER DISTRIBUTION CORPORATION LIMITED (MePDCL) CASE NO. 22 OF 2023 UNDER REGULATION 8 OF THE MEGHALAYA STATE ELECTRICITY REGULATORY COMMISSION (MUTI YEAR TARIFF) REGULATIONS, 2014.

AND IN THE MATTER OF

MEGHALAYA POWER DISTRIBUTION CORPORATION LIMITED, LUMJINGSHAI, SHILLONG-793001- MEGHALAYA.

PETITIONER

IT IS RESPECT SUBMITTED BY THE PETITIONER THAT:

1. In exercising the powers conferred to it under Section 131 and 133 of the Electricity Act 2003, the State Government of Meghalaya notified "The Meghalaya Power Sector Reforms Transfer Scheme 2010", notified on 31st March 2010. The Scheme paved path for the re-structuring and unbundling of the erstwhile Meghalaya State Electricity Board (MeSEB). As per the provisions of the aforesaid transfer scheme MeSEB was un-bundled into four entities which are:
 - a) Meghalaya Energy Corporation Limited (MeECL) which is the holding company;
 - b) Meghalaya Power Distribution Corporation Limited (MePDCL) – Distribution Utility;
 - c) Meghalaya Power Generation Corporation Limited (MePGCL)- Generation Utility;
 - d) Meghalaya Power Transmission Corporation Limited (MePTCL)- Transmission Utility.
2. Though the transfer scheme was notified on 31st March 2010, the holding company MeECL continued to carry out the functions of distribution, generation and transmission utilities till 31st March 2012. After notification of amendment to the Power Sector Reforms Transfer Scheme by the State Government on 1st April 2012, the un-bundling of MeECL into MePDCL, MEPGCL and MePTCL came into effect.
3. The Government of Meghalaya notified the vesting order of the Assets and Liabilities as on 1st April 2010, in the books of MeECL. Subsequently, the State Government notified

the 4th amendment to the Notified Transfer Scheme on 29th April 2015, wherein the opening balances of assets and liabilities of all the four entities namely, MePGCL, MePDCL, MePTCL and MeECL as on 1st April 2012 were ascertained.

4. The instant Petition was filed by MePDCL for the approval of Business Plan for Fourth Control Period i.e., FY 2024-25 to FY 2026-27
5. Hon'ble Commission vide order dated 1st September provisionally admitted the Petition for further examination and registered the Petition against Case No. 22 of 2023.
6. MePDCL would like to submit that it would humbly like to make certain additional submissions in terms of the prayer made at Point no. 6 (c) and (d) at page no.3 of the business plan petition
 - "c. Allow addition/ modification of the business plan during the course of the proceedings of the Petition.
 - "d. To condone any inadvertent omissions, errors and shortcomings and permit the rectification of the same during the course of proceedings of the Petition."
7. MePDCL would like to submit that these additional submissions have bearing on the business plan projections and hence humbly request the Hon'ble Commission to accept the additional submission and take them on records.
8. MePDCL thus humbly prays the Hon'ble Commission to:
 - i. Accept the additional submissions made herein.
 - ii. Consider these additional submissions while approving the business plan.
 - iii. Pass any order as the Commission deems fit.

(P. SAHKHAR)
CHIEF ENGINEER (PMC)

For and behalf of
Meghalaya power distribution corporation limited

Additional Submission- Energy Availability and Power Procurement Plan during 4th Control Period.

1. MePDCL has projected the energy availability and power procurement plan for the 4th control period under Para 3.2 (Page No. 29 to 31) of the Original Petition. MePDCL has projected an availability of 3160.89 MU in 2024-25, 3031.56 MU in 2025-26 and 3167.71 MU in FY 2026-27. This included availability of power from various sources including MePGCL, NTPC, NHPC, OTPC and NEEPCO.
2. MePDCL would like to humbly submit that due consideration was given to include all the available sources in the projections for the energy availability for the 4th Control Period i.e., 2024-25 to 2025-26.
3. However, MePDCL would like to submit that Ministry of Power GOI vide letter dated 14.07.2009 as allocated 49.41 MW of power from upcoming Subansiri HEP of NHPC having total capacity of 2000 MW comprising of 6 units of 250 MW each. The design energy of the project is 7421.59 MU. Letter from MoP GOI dated 14.07.2009 is annexed as **Annexure A** to this Submission. The share of the North Eastern States in the project is 440 MW whereas rest of the of the power is allocated to northern and western states. Accordingly, the share of the Meghalaya comes to 11.23% i.e., 49.41 MW out of 440 MW.
4. In the 24th NERPC meeting held on 27th and 28th June 2023 at Tawang, Arunachal Pradesh it was intimated by NHPC that the first two units of the project would be commissioned by February 2024 and the balance 6 units would be commissioned in 2024-25. Thus the power available from the project should also be a part of projections for 4th Control Period 2024-25 to 2026-27. Copy of the MoM of 24th NERPC Meeting is annexed as **Annexure B** to this submission.27
5. However, MePDCL would like to humbly submit that due to inadvertent oversight this was missed out in the petition filed for approval of business plan.
6. As stated above the share of the Meghalaya is 11.23% of the power allocated to the North Eastern states and as such the energy available to Meghalaya would be 183.36 MU per year. Further, MePDCL would like to humble submit that the tariff for the aforesaid station would be decided by the Central Electricity Regulatory Commission and the same will be used for the projection of power purchase expenses at the time of filing of ARR Petitions.
7. In the 2023-24 the availability of power from this station shall be for two months only and hence the energy available from the station in 2023-24 would be 30.56 MU.
8. Accordingly, the Table 15 of the Petition for Approval of Business Plan would be changed as under:

Table 1 Revised Energy Availability and Power Procurement Plan (Table 15 of Original Petition)

Share Allocation and Projected Availability of Meghalaya												
Sl No	Name of Station	Capacity (MW)	Total Allocation (Mw)	Actual Availability (Mu)	Total Allocation (Mw)	Projected Availability (Mu)	Total Allocation (Mw)	Projected Availability (Mu)	Total Allocation (Mw)	Projected Availability (Mu)	Total Allocation (Mw)	Projected Availability (Mu)
			FY 2022-23		FY 2023-24		FY 2024-25		FY 2025-26		FY 2026-27	
A	MePGCL											
1	Umiam –I	36.0	36.0	117.7	36.0	114.6	36.0	114.6	36.0	114.6	36.0	114.6
2	Umiam –II	20.0	20.0	62.1	20.0	45.4	20.0	45.4	20.0	45.4	20.0	45.4
3	Umiam –III	60.0	60.0	129.6	60.0	137.3	60.0	137.3	60.0	0.0	60.0	127.2
4	Umiam -IV	60.0	60.0	176.0	60.0	203.9	60.0	203.9	60.0	203.9	60.0	203.9
5	MLHEP	126.0	126.0	359.7	126.0	478.7	126.0	478.7	126.0	478.7	126.0	478.7
6	Umtru	11.2	11.2	0.0	11.2	0.0	11.2	0.0	11.2	0.0	11.2	0.0
7	Sonapani	1.5	1.5	6.5	1.5	4.9	1.5	4.9	1.5	4.9	1.5	4.9
8	New Umtru	40.0	40.0	196.2	40.0	231.5	40.0	231.5	40.0	231.5	40.0	231.5
9	Ganol	22.5	22.5	0.0	22.5	0.0	22.5	66.2	22.5	66.2	22.5	66.2
10	Lakroh	1.5	1.5	3.4	1.5	10.9	1.5	10.9	1.5	10.9	1.5	10.9
11	Riangdo	3.0	3.0	0.0	3.0	0.0	3.0	0.0	3.0	8.0	3.0	17.0
12	MLHEP-II	210.0	210.0	0.0	0.0	0.0	0	0.0	0.0	0.0	0.0	0.0
	Sub-Total MePGCL	591.70	591.70	1051.20	381.70	1227.28	381.70	1293.47	381.70	1164.14	378.70	1300.30
B	NEEPCO											
1	Kopili	200	35.05	0.0	35.1	17.0	35.1	106.8	35.1	106.8	35.1	106.8
2	Kopili-Ext	25	3.45	0.0	3.5	7.2	3.5	10.1	3.5	10.1	3.5	10.1
3	Khandong	50	8.51	0.0	8.5	0.0	8.5	26.8	8.5	26.8	8.5	26.8

Share Allocation and Projected Availability of Meghalaya												
SI No	Name of Station	Capacity (MW)	Total Allocation (Mw)	Actual Availability (Mu)	Total Allocation (Mw)	Projected Availability (Mu)	Total Allocation (Mw)	Projected Availability (Mu)	Total Allocation (Mw)	Projected Availability (Mu)	Total Allocation (Mw)	Projected Availability (Mu)
			FY 2022-23		FY 2023-24		FY 2024-25		FY 2025-26		FY 2026-27	
4	Ranganadi	405	47.10	152.3	47.1	162.9	47.1	162.9	47.1	162.9	47.1	162.9
5	Doyang	75	8.69	18.9	8.7	19.8	8.7	19.8	8.7	19.8	8.7	19.8
6	AGBPP	291	34.74	204.1	34.7	209.9	34.7	209.9	34.7	209.9	34.7	209.9
7	AGTPP CC	130	16.57	112.0	16.6	122.5	16.6	122.5	16.6	122.5	16.6	122.5
8	Pare	110	14.0	67.2	14.0	71.0	14.0	71.0	14.0	71.0	14.0	71.0
9	Kameng	600	15.0	69.5	15.0	58.9	15.0	58.9	15.0	58.9	15.0	58.9
	Sub-Total NEEPCO		183.11	623.9	183.11	669.16	183.11	788.72	183.11	788.72	183.11	788.72
C	NHPC-Loktak	105	13.007	35.59		4.0		0.00		0.00		0.00
D	NHPC-Subansiri	2000	12.35	10.19	49.41	183.36	49.41	183.36	49.41	183.36	49.41	183.36
E	OTPC-Palatana	726	78.99	498.73	78.99	492.00	78.99	500.54	78.99	500.54	78.99	500.54
F	NTPC											
1	BTPS	750	0.0	0.00	53.0	350.00	88.0	578.16	88.0	578.16	88.0	578.16
2	FSTPS	0.00	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3	KHSTPS-I	0.00	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4	KHSTPS-II	0.00	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
5	TSTPS-II	0.00	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Sub-Total NTPC		0.00	0.00	53.00	350.00	88.00	578.16	88.00	578.16	88.00	578.16
	Total			2209.42		2752.63		3344.25		3214.92		3351.07

9. Further MePDCL would like to submit that the change in the availability would also have the bearing on the Energy Balance of the state. Accordingly, the Energy balance submitted in the original petition at page no. 36 would stand changed as under:

Sr. No.	Particulars	Calculation	FY 2023-24	2024-25	2025-26	2026-27
1	Power purchased from the Eastern Region (ER)	A	0	0	0	0
2	Inter-state transmission loss for ER	B	1.80%	1.80%	1.80%	1.80%
3	Net power purchased from the ER	$C=A*(1-B)$	0	0	0	0
4	Power purchased from the North - Eastern Region (NER)	D	1525.36	2023.96	2023.96	2023.96
5	Inter-state transmission loss for NER	E	3.00%	3.00%	3.00%	3.00%
6	Net power available at state bus from external sources on long term	$F=(C+D)*(1-E)$	1479.60	1963.24	1963.24	1963.24
7	Power purchased from generating stations within the state	G	1227.28	1320.29	1190.96	1327.12
8	Power purchased from other sources	H				
	Intra-State Transmission Losses		3.18%	3.18%	3.18%	3.18%
	Total Availability at MePDCL Periphery	I=F+G+H	2,620.79	3,179.12	3,053.90	3,185.72
9	Power to be sold to consumers within the state (including ASEB)	J	1831.63	1954.53	2088.49	2234.60
10	Transmission & Distribution Losses (%)	K	18.00%	17.00%	16.50%	16.00%
11	Net power requirement at state bus for sale of power within the state	$L=J/(1-K)$	2233.70	2354.85	2501.19	2660.23
12	Surplus Power (for sale outside state)	$M = I - L$	387.10	824.26	552.71	525.49

10. In view of the submission above MePDCL would humbly like to pray the Hon'ble Commission to consider the revised energy availability and the revised energy balance of the state as projected above.

11. In addition to the above submission MePDCL would like to humbly submit that at para 3.1.2-page no. 21 of the original petition MePDCL has submitted that:

"As on 31st March 2023 the total number of consumers served by MePDCL are 6,82,030 with a connected load of 1,34,067.34 Kva including both consumers at LT level and HT level. The major contributor to the number of consumers are LT Domestic and Kutir Jyoti Consumers which together constitute around 94% of the total consumers. In terms of connected load also LT Domestic and Kutir Jyoti consumers contribute to around 60% of

the total connected load, whereas industrial consumers both at HT and EHT level contribute to approximately 19% of the total connected load. In terms of sales the Industrial consumers at HT and EHT level contribute to around 47% of the sales of FY 2022-23."

12. It is humbly submitted that total connected load of MePDCL has been shown as 1,34,067.34 Kva due inadvertent typographical error. The total connected load of MePDCL as on 31.03.2023 is 13,40,867.34 MU. MePDCL regrets the inadvertent typographical error. However, this does not have any bearing on the calculations and projections made for the 4th Control Period.

13. In view of the above submissions MePDCL prays the Hon'ble Commission to accept the additional submissions made by MePDCL herein and take the same into consideration for deciding the business plan for MePDCL for 4th Control period.

Annexure:

1. Annexure A- MoP Letter Dated 14.07.2009
2. Annexure B- Copy of MoM of 24th NERPC Meeting.