

**BEFORE THE CHHATTISGARH STATE ELECTRICITY
REGULATORY COMMISSION, RAIPUR**

PETITION NO. 04 OF 2025

In the matter of :-

Bhilai Steel Plant- Town Electrical Engineering
Department (BSP-TEED), Bhilai

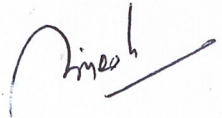
...PETITIONER

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Raipur

Dated: 28.02.2025



दिनेश कुमार
DINESH KUMAR
GM (Electrical)
TEEP / TSD
BHILAI STEEL PLANT

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**BEFORE THE CHHATTISGARH STATE ELECTRICITY
REGULATORY COMMISSION, RAIPUR**

Petition No. 04 of 2025

IN THE MATTER OF:

PETITIONER: Bhilai Steel Plant-Town Electrical Engineering
Department (BSP- TEED), Bhilai

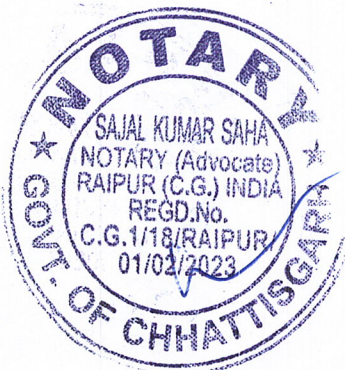
ADDITIONAL SUBMISSION ON BEHALF OF PETITIONER

IN ACCORDANCE WITH THE LETTER DATED 24.01.2025

ISSUED BY THE HON'BLE COMMISSION

Most Respectfully Showeth:

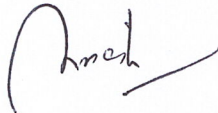
1. That the Hon'ble Commission vide letter dated 24.01.2025 had sought for additional information from the Petitioner herein pertaining to the tariff petition filed by it.
2. That the instant submission is being made to bring on record additional information as sought by the Hon'ble Commission.




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3. Copy of petition in MS Word is submitted and mailed to the email id of the Hon'ble Commission at cserec.sec.cg@nic.in.
4. With respect to point 3, BSP submits that category wise sales reported in Table-2 of the Petition are a mix of metered and assessed sales with a majority of sales being metered sales. Further, since the sales are mix of assessed and metered sales, the sales for HT-3 category of consumers are at same level of 10.71 MU for last 3 years i.e. FY 2021-22, FY 2022-23 and FY 2023-24.
5. With respect to point 4, Petitioner submits that the steep increase in distribution losses is due to commercial losses and theft of electricity. However, Petitioner is taking appropriate measures by improving its distribution system to minimize distribution losses.
6. With respect to point no. 5, BSP-TEED submits that the Hon'ble Commission may allow it sharing of efficiency losses on account of Distribution losses as per applicable MYT Regulations.




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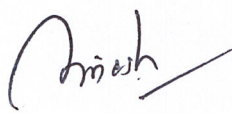
7. With respect to point no. 6, following is submitted against queries raised in 6 (a), 6(b), 6 (c) -

(a) (b)- The increase in actual power purchase cost for FY 2023-24 is due to increase in generation cost of NSPCL power plant, increase in variable cost of power, peak hour charges. Further, cost of power purchase has increased due to addition of taxes and duties, however, the same has already been recovered from the consumers. Thus, after reducing the amount of taxes and duties, the cost of power purchase would be around Rs. 3.86/- Kwh.

(c)- Revenue from sale of electricity as reflected in Table No. 14 includes duties and taxes of Rs. 6.26 crores collected from consumers and the same has already been deposited to the Government.

Further, excluding the incidence of taxes and duties, per unit purchase cost of power for Petitioner in FY 2023-24 would be




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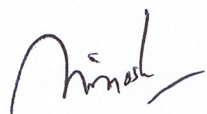
around Rs. 3.86 /- kwh and revenue from sale of power would be Rs. 7452 lakhs (rounded off figure).

8. With respect to point 7, kindly consider the below mentioned table in place of Table provided in para 2.4.4-

Wind	HPO	Other	Total
1.60%	0.66%	24.81%	27.08%

9. With respect to point 8, it is submitted that power upto 5 MW is received by BSP-TEED from NSPCL PP1 (Cogeneration unit) and the remaining power is sourced from PP3. It is submitted that the tariff petition inadvertently mentions that complete power is sourced from PP3 when in reality power upto 5 MW is sourced from PP1. It is humbly requested that the information provided herein be considered for assessing RPO related compliances.




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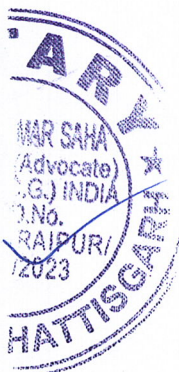
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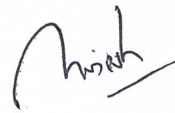
10. With respect to point 9, Petitioner has already requested Chhattisgarh State Renewable Energy Development Agency (CREDA) certifying status of RPO compliance for FY 2023-24 and the same will be submitted before the Hon'ble Commission as and when it is received from the office of CREDA.

11. With respect to point 10, it is submitted that the Employee expenses has reduced in FY 2023-24 as compared to FY 2022-23 due to factors like retirement of employees, claim expenses on employment benefits, etc.

12. With respect to point 11, as advised in the TVS session conducted on 29/01/2025, the revised normative expenses for FY 2023-24 is as mentioned below

O & M Expenses	FY 2023-24 (Normative) in Rs. lakhs
A & G Expenses	194.6
R & M Expenses	177.14




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13. With respect to point no. 12 BSP-TEED submits that the Hon'ble Commission may allow it sharing of efficiency gains/losses on account of difference between normative and actual O&M Expenses as per applicable MYT Regulations.

14. With respect to point no. 13, following details are submitted with respect to capitalisation claim of Rs. 3.04 crores-

- Even though capitalisation for FY 2023-24 was approved as "nil", however, the petitioner in order to develop and upgrade its distribution network to ensure reduction in distribution losses and to enhance the safety of its equipments, has infused capital of Rs. 3.04 crores in the FY 2023-24. This was done on the basis of internal policy decision of SAIL.
- The capital expenditure includes expenses made towards change of transformers, procurement of 315 kVA transformers, PDB Boards, insulators, procurement of additional meters and towards safety works etc.




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- The capital expense as detailed above would result in energy saving, increase in meterisation and may result in reduction of distribution losses.

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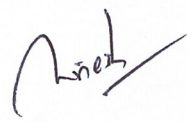
15. With respect to point no. 14, following is submitted -

- Amended Table 8 of the petition is provided below-

Table 8: Interest on Loan of BSP-TEED for the FY 2023-24 (Rs. Lakh)

Sr. No.	Particulars	FY 2023-24	
		MYT Order	Actual
1.	Opening Net Normative loan for the year.	—	-
2.	Addition of normative loan during the year.	-	212.8
3.	Repayment of normative loan during the year	-	50.00
4.	Closing Net Normative loan	-	162.80
5.	Rate of Interest (%)	11.00%	8.8%
6.	Interest Expense		7.16
7.	Add other interest and finance charges		28
8.	Interest on loan capital	-	35.16




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- The parent company of BSP-TEED i.e. SAIL takes loan capital and part of it is disbursed to BSP-TEED. The weighted average interest on loan taken by SAIL comes to around 8.8% and the interest on loan capital is accordingly adjusted in the above Table.

16. With respect to point no. 15, amended Table No. 10 showing calculation of interest on working capital is provided below-

Table 10: Interest on Working Capital of BSP-TEED for the FY 2023-24 (Rs. Lakh)

Sr. No.	Particulars	FY 2023-24	
		MYT Order	Actual
	O&M Expenses for 15 days	79.08	80.24
	Maintenance Spares @20% of M&G Expenses	70.30	74.35
	Receivables equal to 15 days of revenue from sale of electricity at prevailing tariffs within state	840.03 (this was receivable for 1 month as per prevailing MYT Regulation at the time of computation of ARR)	332.01



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Working Requirement	Capital	989.41 (this was arrived since receivable from sale of electricity for one month was taken)	486.6
	Rate of Interest (%)	9.00%	8.8%
	Interest on Working Capital	89.05	42.82

17. With respect to point no. 16, detailed breakup of Non-Tariff Income of Rs. 129 Lakh considered in Table 13 of the Petition is provided below for reference-

DEPOSIT_TYPE	FY2023_2024
ANNUAL RENTAL CHARGES	3081673
APPL PROCESS FEE FOR 3 PHASE LT CONN WITHOUT CT UPTO 19 KW	1000
APPL PROCESS FEE LT COMMERCIAL	57371
AUGMENTATION CHARGES ABOVE 5KW	268878
DISCONN/RECONN ON CONSUMER REQUEST 1 PHASE	9905
DISCONN/RECONN ON CONSUMER REQUEST 1 PHASE 3 PHASE ABOVE 19kw	1150
DISCONN/RECONN ON CONSUMER REQUEST 1 PHASE 3 PHASE ABOVE 19kw	30990
METER TEMPERING	359618
METER TESTING 1 PHASE	82235
METER TESTING 3 PHASE	14000
NEW CONN CHARGES APPL PROCSESS FEE LT DOMESTIC	6235
PENALTY THEFT	1365
RECONN OF DEFAULT 1 PHASE	30323
RECONN OF DEFAULT 1 PHASE 3 PHASE ABOVE 19kw	2305
RECONN OF DEFAULT 1 PHASE 3 PHASE ABOVE 19kw	2005
SECURITY DEPOSIT NEW CONN	191735



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SECURITY DEPOSIT NEW CONN ADDITIONAL LOAD	63421
SECURITY DEPOSIT NEW CONN CHANGE OF OWNERSHIP	118720
SECURITY DEPOSIT NEW CONN TEMPORARY CCONN	615601
SUPERVISORY CHARGES 1 PHASE	11471
SUPERVISORY CHARGES 3 PHASE ABOVE 19KW	2010
SUPERVISORY CHARGES 3 PHASE UPTO 19 KW	6580
TEMP CONN	7947249
TOTAL	12906002

18. With respect to Point No. 18, it is humbly submitted that BSP-TEED has computed revenue gap and claimed the same in Table No. 15. There is a specific [negative (-)] sign preceding data showing there is a revenue gap. Amended revenue gap as per the amendment in various parameters as provided in the instant affidavit is provided below for reference-

Table 15: Summary of ARR for BSP-TEED for the FY 2023-24

(Rs. Lakh)

Particulars	FY 2023-24	
	MYT Order	Actual
Power Purchase Cost	7900.50	7814
O&M Expenses	1924.27	1925.74
Depreciation	48.31	50
Interest on loan capital	-	35.16
Normative Interest on Working Capital	89.05	42.82



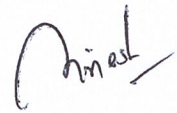
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Interest on Consumer Security Deposit	-	26.74
Provision for Bad & Doubtful debts	-	-
Return on Equity	35.67	42.68
Provision for Bad debt	-	-
Less: Non-Tariff Income	100.32	129
Net Aggregate revenue Requirement	9897.47	9937.14
Less: Revenue from Sale of Electricity		8079
Revenue Gap/(Surplus)		1858.14

19. With respect to point no. 19, it is humbly submitted that even though the CAGR comes to be negative, BSP-TEED expects an increase in sales due to increase in population of the area. Therefore, petitioner (BSP-TEED) is not relying upon the CAGR for projecting sales for the FY 2025-26. However, in compliance with the Hon'ble Commission's direction, category wise CAGR is provided below for reference-

Category	LT1	LT2	LT3	LT4	LT5	HT1	HT2	HT3
CAGR	-3%	5%	-3%	4%	21%	6%	-3%	0%


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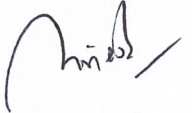
Further, with respect to point 19 (b), BSP-TEED submits that it has forecasted a 10% increase in sales across all categories due to increase in population and consumption. Thus, a 10% increase in sales as approved in ARR for FY 2024-25 is considered for determining tariff for FY 2025-26.

Furthermore, for point 19(c) the G-form for category-wise sales in H1 of FY 2024-25 is Annexed herein as ANNEXURE P-1.

20. With respect to point no. 20, it is submitted that there is constant increase in illegal settlement and theft due to which distribution losses of BSP-TEED have increased significantly. Submissions made with respect to achieving of lower/target distribution losses in Para 2.3.2 of the petition was an inadvertent error and it is requested that the same may not be relied upon.

21. BSP-TEED had undertaken capitalisation of Rs. 3.04 Crores in FY 2023-24 with respect to change of transformers, procurement of 315 kVA transformers, PDB Boards, insulators, procurement of additional meters, etc. This together coupled with the capitalisation being




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undertaken by BSP-TEED during FY 2024-25 and 2025-26 would ensure that the Distribution losses are brought down significantly over period of time.

22. With respect to point no. 21, it is submitted that the power purchase quantum from PP1 which is a cogen unit has been inadvertently mentioned as NIL. BSP-TTED submits that it shall be procuring power from PP1 and PP3 together to achieve its RPO target for FY 2025-26. As of now upto 5 MW of power is supplied by NSPCL PP1 and remaining is supplied by NSPCL PP3. Similar arrangements will be followed in FY 2025-26 to meet RPO compliance.

23. With respect to point no. 22, it is submitted that the cost of generation (variable cost) is likely to increase in the FY 2025-26 due to increase in coal prices and other factors affecting generation. Thus, power purchase cost is projected to be Rs. 4.50/kWh for FY 2025-26.



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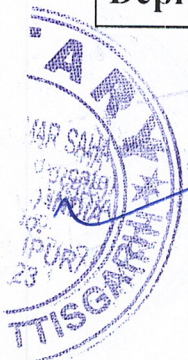
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24. With respect to point no. 23, it is submitted that the capitalisation of Rs. 105 Lakhs submitted by BSP-TEED is towards proposed expenditure that it will incur for improvement of its distribution system. It is submitted that a detailed capital investment plan is in discussion stages and is yet to be approved by the management of BSP-SAIL and therefore, the same cannot be submitted at this stage. However, BSP-TEED submits that as and when the detailed capital investment plan would be approved, it shall be submitted before the Hon'ble Commission.

25. With respect to point no. 24, it is submitted that the Opening GFA is inadvertently mentioned as Rs. 1733.89 akhs in place of Rs. 2032 lakhs.

Updated Table No. 23 is provided below for reference-

Particular	FY 2025-26
	Projected
Opening GFA	2032
Addition to GFA	105
Closing GFA	2137
Depreciation	51.57




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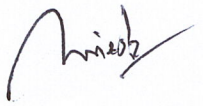
26. With respect to point no. 25, it is submitted that depreciation has been arrived at by applying a straight line method.

27. With respect to point no. 26, updated table showing Return on normative equity is provided below-

Particular	FY 2025-26
	Projected
Opening Equity	258.6
Normative Addition during the year	31.5
Closing Equity	290.1
Return on Equity @16%	46.416

28. With respect to point no. 28, it is humbly submitted that the amount reflected against Revenue is preceded with (-) which would mean that the value is in negative and thus there is a reflection of revenue gap as claimed in the petition. It is humbly requested that the Hon'ble Commission may consider revenue gap as Rs.1470.306 lakhs which is computed in updated Table No. 30 below-




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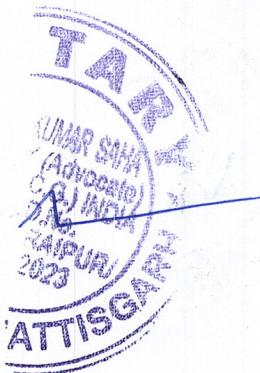
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Table 30: ARR for FY 2025-26 (in Rs. lakh)

Particulars	FY 2025-26
	Projected
Power Purchase Cost	8808.3
O&M Expenses	2070
Depreciation	51.57
Interest & Finance Charges	14.63
Normative Interest on Working Capital	59.09
Provision for Bad & Doubtful Debts	-
Return on Equity	46.416
Less: Non-Tariff Income	129
Net Aggregate Revenue Requirement	10921.006
Less: Revenue from Sale of Electricity	9450.7
Revenue Gap/(Surplus)	1470.306

Table 31: Revenue Gap for FY 2025-26 at existing tariff (in Rs. Lakh)

Sr. No.	Particulars	Amount
1.	Aggregate Revenue Requirement	10921.006
2.	Revenue from Sale of Power @ Existing Tariff	9450.7
3.	Revenue Gap/ (Surplus)	1470.306



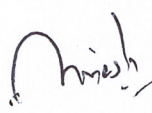

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29. With respect to point no. 30, it is submitted that BSP-TEED at this juncture doesn't desire any change in existing terms and conditions of retail tariff other than what has already been stated in the petition and this additional submission.

30. With respect to point no. 31, it is humbly submitted that seeking a relief from the Hon'ble Commission is BSP-TEED's legal right and the petitioner has provided reasons for making such prayer in the petition. It is requested that the Hon'ble Commission may decide the petition in accordance with the applicable Regulations and data provided in the petition and the instant submissions.

31. With respect to point no. 32, it is humbly submitted that Petitioner is seeking recovery of meter hire charges in line with the previous tariff orders of the Hon'ble Commission wherein, the Hon'ble Commission has allowed recovery of such charges. The Hon'ble Commission in Petition 106 of 2023 has allowed recovery of meter hire charges and it




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is requested that the same maybe allowed to Petitioner in the instant petition.

32. BSP-TEED has tried to provide all data available with it in compliance of the Hon'ble Commission directives, if any data is still remaining to be provided, the petitioner requests that the Hon'ble Commission may grant it additional time to submit the same and issue it appropriate directions in this regard.

33. BSP-TEED submits that it has carried out the calculation on prudence method, however, it is submitted that if there is an inadvertent error on the same, it is humbly requested that the Commission may pass appropriate order based on available data and records in accordance with applicable MYT Regulations.

34. BSP-TEED humbly submits that it reserves its right to file any additional documents/submissions in support of its petition as and when required.

RAIPUR

28.02.2025



A handwritten signature in blue ink, appearing to read 'Dinesh', is located above the typed name.

(DINESH KUMAR)

GM (TEED)

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**BEFORE THE HON'BLE CHHATTISGARH STATE ELECTRICITY
REGULATORY COMMISSION, RAIPUR**

Petition No. 04 of 2025

IN THE MATTER OF:

PETITIONER

: Bhilai Steel Plant-Town
Electrical Engineering
Department (BSP- TEED),
Bhilai

AFFIDAVIT

I, Dinesh Kumar S/o Shri Balan Nair, aged about 59 years, working as GM (TEED) TS Department, Bhilai Steel plant has solemn affirmation on oath as under:

1. That, I am the authorized signatory of the Petitioner in the instant case and as such fully conversant with the facts of the present case.
2. That the accompanying additional submissions has been drafted as per my instructions and the contents made in Paras 1 to 34 are true and correct according to my knowledge and belief and as per the office records.
3. That nothing material is concealed or overstated in the instant accompanying additional submissions.

VERIFICATION

I, Dinesh Kumar, the above described deponent, solemnly affirm and verify that the contents of this affidavit are true to my personal knowledge and belief.

Hence verified and signed on **28 FEB 2025** at Raipur C.G).

IDENTIFYING WITNESS

**THE DEPONENT SOLEMNLY
AFFIRMED BEFORE ME, THE
DEPONENT READ OVER AND
UNDERSTANDS.**

**S.K. SAHA
NOTARY
RAIPUR (C.G.)**

28 FEB 2025

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SAIL-BHILAI STEEL PLANT
TOWN ELECTRICAL ENGINEERING DEPARTMENT
G-FORM FOR THE MONTH BETWEEN: 202404 AND 202412

Sl. No.	Category	Consu	Unit	Billed	Energy Chgs	Duty	Cess	Fix+Energy	Total	Realisation	Surcharge	Realisation- (Duty+Cess)
					[a]	[b]	[c]	[a+b]	[a+b+c+d]	E	F	[E-(C+D)]
	HT3	135	8032941	5519880	0	0	0	0	0	0	0	0
	LT2	29562	21029684	8858558	62299920	0	0	67819800	68623094	68623093	0	67819799
	LT3	476	328646	499392	122469803	17768178	2058196	131328361	151154735	120254581	622643	100428207
	LT4	2133	6035465	6896430	1499353	52380	32325	1998745	2083449	1453065	10597	13683360
	LT1	156854	50045589	10980602	47208208	0	603547	54104638	54708185	50937939	0	50334392
	HT1	63	117563	447801	173305391	15831831	4881191	184285993	204999014	105252652	725896	84539630
	HT2	252	7073078	11910150	634463	61603	9166	1082264	1153033	1188345	165	1117576
	LT5	841	17425	1170038	54599398	7443433	657229	66509548	74610210	72370105	6418	64269443
	BSP	102736	30858474	20695197	1170038	139800	32285	2340076	2512161	2512161	0	2340076
	TOTAL	293061	123538865	66978048	563970564	50939817	12162873	121479187	134207419	134207419	0	121479187

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