



## JODHPUR VIDYUT VITRAN NIGAM LTD.

Corporate Identity Number (CIN) -U40109RJ2000SGC016483

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No.JdVVNL/SE(RA&C)/JU/S.RA/2025-26/D. 240

Dt. 09-05-25

The Receiving Officer,  
Rajasthan Electricity Regulatory Commission,  
Vidhyut Viniyamak Bhawan,  
Near State Motor Bhawan,  
Shankar Marg,  
Jaipur.

**Sub: - Response on comments/suggestions received from Power Foundation of India (PFI) in petition no. RERC/2286/2024 for approval of True-up for FY 2023-24, in respect of JdVVNL.**

**Ref.: Your office Letter No. 90 dtd. 16.04.2025.**

On the above cited subject and letter under reference, para-wise replies in the matters raised by the learned stakeholder are mentioned as under: -

1. No Comments
2. No Comments

### **Issue A: Huge Unmetered Energy Sales to Agriculture**

The petitioner submits that during the FY 2023-24, JdVVNL supplied 1,254 MU to agricultural consumers on a flat rate basis. The petitioner submits that the conversion is an ongoing process and considering the significant challenges, the Discom undertook extensive efforts to convert all flat rate consumers to metered billing, resulting in zero flat rate consumers remaining by the end of FY 2024-25. The Discom respectfully requests the Honorable Commission to acknowledge the efforts undertaken and consider flat-rate sales for FY 2023-24.

### **Issue B: Higher Distribution losses than the target**

The petitioner submits that the Commission in its Tariff Order approved distribution loss of 15.00%. The Petitioner has however achieved distribution loss level of **23.58%** in FY 2023-24.

It is important to highlight that Jodhpur Discom is relatively large in terms of area (1.83 lac sq. km), and that because of the low consumer density & high agriculture consumer mix and scattered geographical distribution of its consumers, it is difficult for the Discom to set up the necessary infrastructure to provide all consumers with 24-hour electricity. Jodhpur Discom is at a disadvantage compared to the other two Discoms of the State as a result of the high cost of delivering the essential infrastructure to dispersed users as well as distribution losses. The petitioner has taken rigorous efforts to reduce the Distribution Losses.

#### **Issue C: No Bifurcation of Transmission Losses**

The Petitioner submits that Regulation 8 of the Rajasthan Electricity Regulatory Commission (Terms and Conditions for Determination of Tariff) Regulations, 2019 (Tariff Regulations 2019) stipulates the framework by which the Petitioner has prepared the Instant Petition. Accordingly, the Instant Petition is based on the audited accounts for FY 2023-24. Moreover, it is submitted that the audited accounts of the Discom does not include information of inter and intra-state transmission losses separately. As a result, the Petitioner has submitted the aggregated transmission losses for the entire FY 2023-24 as a combined figure, encompassing both inter- and intra-transmission losses and requests Hon'ble Commission to kindly consider the same. Furthermore, a copy of the calculation sheet for transmission losses for FY 2023-24 as **Annexure-1**.

#### **Issue D: Higher Power Purchase Cost**

##### **Issue D: 1: Power Purchase Cost due to excess Distribution losses than target**

The Petitioner submits that the Power Purchase cost and energy balance as claimed in the True Up petition for FY 2023-24 is as per the annual audited accounts of the Discom duly certified by the statutory auditor as well as the CAG and the Discom requests the Hon'ble Commission to kindly consider the same.

##### **Issue D: 2: Costlier Sources of Power**

The petitioner submits that, In FY 2023-24, JdVVNL has procured power from costlier sources such as Coastal Gujarat at Rs. 5.16 per unit and NTPC-Meja at Rs. 6.31 per unit. NTPC-Meja has a long-term power purchase agreement with the state DISCOMS, and the tariffs of NTPC-Meja and CGPL are determined by CERC. The procurement from these units is done based on the Merit Order Dispatch (MOD) principle. This approach restricts the purchase of costlier power, ensuring that power from more expensive sources is only procured when necessary.

Power from costlier sources is purchased primarily in cases where the system demand is high. The demand is typically high during peak hours and low during off-peak hours. This disparity leads to significant differences in market behaviour:

- During peak demand periods, prices increase, making purchases more expensive.
- During low-demand periods, sale prices decrease due to market surplus.

If power is procured from the mentioned plants, it indicates a case of high demand. In the interest of consumers, all sources of power need to be procured as required, whether from available LTA sources or from the market. This ensures a reliable power supply and meets the varying demand efficiently. Furthermore, The details of "Others" is depicted in format 3.1 of the submitted True-up formats.

The petitioner further submits that, In FY 2023-24, the state's total thermal capacity was 13,884.8 MW of tied-up capacity, of which 11,426 MW plants under CPSU/State Power Genco had their tariffs decided by the Commission. Additionally, 2,458 MW of IPP plants were tied up under Section 63 through TBCB, and all remaining power was procured through competitive bidding, adhering to all applicable regulations and guidelines.

DISCOMS strictly adheres to the principles of competitive power purchase as mandated by the regulatory provisions. All power procurement is conducted through transparent and competitive bidding processes to ensure the least cost basis for power purchase.

Any deviations from the approved power purchase plan are carefully analyzed and justified based on operational requirements and grid stability considerations. These deviations are not taken lightly and are always aimed at ensuring reliable power supply to consumers.

The concern regarding the impact of power purchase costs on consumer tariffs. DISCOMS is committed to minimizing this impact by optimizing power procurement strategies and leveraging competitive bidding to secure the best possible rates.

By optimizing power procurement strategies, for FY 2024-25 (up to November) the average rate for power purchase is Rs. 4.70 per unit, indicating a reduction of Rs. 0.30 per unit, reflecting a more cost-effective procurement strategy.

The Petitioner humbly reiterates that the power purchase expenses as submitted in the Instant Petition are as per the expenditure recorded by the Discom in the financial statements for FY 2023-24, duly audited by Statutory Auditor appointed by the CAG. Thus, the Petitioner requests the Hon'ble Commission to consider the submissions made in the Instant Petition.

### **Issue E: Renewable Purchase Obligation Target**

The Petitioner submits that in Format 3.1 of the Instant Petition, the Petitioner has submitted the details of source-wise power procurement during FY 2023-24. Furthermore, the Petitioner invites the attention of the learned stakeholder to the Discom's reply to the deficiencies observed by the Hon'ble Commission on the Instant Petition wherein the Discom has submitted a detailed statement on the Hon'ble Commission's directive on meeting the RPO targets notified vide the relevant Regulations.

However, the Petitioner humbly reiterates that the RUVITL, on behalf of the Discom, had arranged and approved the requisite capacity to meet the acquired backlog and prospective years' RPO targets until 31.03.2024. Despite the same, the RPO targets and acquired backlog could not be met primarily for the following reasons:

- a) In FY 2023-24, 34% of the state's total tied-up capacity comprised of renewable energy (RE) sources. The capacity tied up by RUVITL could not get commissioned within the prescribed timelines which is not attributable to the RUVITL. To address the RPO for the respective years and the backlog from previous years, the Board of RUVITL approved the procurement of 4885 MW of solar and 1426 MW of wind power through Tariff-Based Competitive Bidding (TBCB) conducted by SECI in February 2019. SECI carried out bidding in various tranches and selected solar and wind power producers to set up this capacity. However, due to several factors such as the global COVID-19 pandemic, extensions in completion timelines by the Ministry of New and Renewable Energy (MNRE), judicial rulings like the Supreme Court's verdict in the Great Indian Bustard matter, supply chain shortages, changes in law claims, and the non-readiness of power evacuation infrastructure, these projects were delayed, leading to an accumulation of the RPO backlog.
- b) Existing biomass power plants did not operate at 80% normative PLF, and apart from these, three biomass projects with a cumulative capacity of 32.45 MW (227.40 MUs annually) have not been generating since 2018-19.
- c) RUVITL was vigorously pursuing M/s. Jindal Urban Waste Management (Jaipur & Jodhpur) Ltd. since April 2019 for signing a PPA for setting up 18 MW waste-to-energy plants. However, the PPA could not be signed timely due to delays in signing the land lease agreement between power producers and the respective Nagar Nigam. This capacity, as per the envisaged timeline, should have been commissioned in FY 2021, but has now been postponed to July 2025.
- d) RUVITL has also signed PPAs with 77 solar generators and 16 wind generators related to the REC mechanism. Out of these, 73 solar generators and 15 wind generators have furnished bills thus far. Certain generators have not furnished bills yet, and the energy corresponding to these generators is approximately 23.87 MUs.
- e) The table below shows that RUVITL could have achieved the respective year's RPO targets and accrued backlogs, with a surplus quantum of 10,223 MUs available until the end of FY 2023-24 against the accrued backlog of 10,486 MUs. The mere deficit of 263 MUs (10,486 – 10,223 MUs) of RPO backlog can be attributed to the fact that against the approved wind capacity of 1426 MW, only 1200 MW could have been arranged at that time as it was readily available with SECI, and the Board of RUVITL pursued the same.

Year	Total Energy (MU) excluding Hydel Energy from 2017-18	Actual			In case capacity would have been commissioned as per envisaged planning	
		Target	Achievement	Diff	Achievement	Diff
2020-21	28762.46	13114	11021.76	-2092.19	12180.25	-933.70
2021-22	84518.05	15618.9	13402.78	-2261.16	18075.94	2497
2022-23	95025.75	18957.6	14427.89	-4529.75	20798.02	1840.37
2023-24 (Prov.)	102066.39	22107.6	15360.17	-6747.41	28967.02	6859.44
<b>Total</b>					80021.23	10223.12

Given these circumstances, the deposit in the RPO fund should not be reduced from the Aggregate Revenue Requirement (ARR) for FY 2023-24, as the delays were beyond the control of the procuring entities and were influenced by external factors. The Petitioner requests the Hon'ble Commission to kindly consider the submissions made.

Furthermore, details of RPO compliance by Ajmer Discom during FY 2023-24 is provided in Note Other Disclosures of the audited accounts for FY 2023-24. The Petitioner requests the Hon'ble Commission to consider the same. It is also submitted that the RUVITL has filed Petition under Regulation 9 (2) of the Rajasthan Electricity Regulatory Commission (Renewable Energy Certificate and RPO Compliance Framework) Regulations, 2010 read with Section 86 (1) (e) and 86 (1) (f) of the Electricity Act, 2003 to waive off the shortfall of RPO ought to be complied by the Discoms accruing from year 2011-2024. It should be noted that the matter is pending before the Hon'ble Commission.

#### **Issue F: Disallowance on Account of Excess Depreciation**

The Petitioner submits that the Discom has adhered to the provisions and methodology for depreciation and amortization as outlined in the Tariff Regulations 2019. Furthermore, the block wise depreciation booked by the Petitioner is also available in the audited financial statements for FY 2023-24. Additionally, the expenditure incurred by the Discom in the Instant Petition has been submitted as per the expenditure recorded in the financial statements of the Discom for FY 2023-24, duly audited by a Statutory Auditor appointed by the CAG. The Petitioner requests the Hon'ble Commission to consider the submissions made in the Instant Petition.

### **Issue G: Other Debits**

The Petitioner once again reiterates that the estimates submitted in the Instant Petition are as per the expenditure recorded by the Discom in the financial statements of the Discom for FY 2023-24, duly audited by a Statutory Auditor appointed by the CAG. The Petitioner requests the Hon'ble Commission to consider the submissions made in the Instant Petition.

### **Issue H: Summary**

The Petitioner reiterates that the Instant Petition and the accompanying Formats have been submitted in accordance with the provisions of the Tariff Regulations 2019. The estimates submitted in the Instant Petition are as per the expenditure incurred by the Discom during FY 2023-24, as recorded by the financial statements for FY 2023-24, duly audited by a Statutory Auditor appointed by the CAG. The Petitioner humbly requests the Hon'ble Commission to consider the same.

The above responses are hereby submitted for your kind perusal and further needful.

Encl: As above

  
(GHANSHYAM CHAUHAN)  
SUPERINTENDING ENGINEER (RA&C)  
JODHPUR DISCOM, JODHPUR

Copy submitted/forwarded to the following, for information and necessary action:

1. The Addl. Chief Engineer (HQ), Jodhpur Discom, Jodhpur.
2. The TA to MD, Jodhpur Discom, Jodhpur.
3. Power Foundation of India, B-28, Qutab Institutional Area, New Delhi-110016, email- dg@powerfoundation.org.in

  
SUPERINTENDING ENGINEER (RA&C)  
JODHPUR DISCOM, JODHPUR

## Inter Discom calculation for the year 2023-24 (prov.)

	Jaipur	Ajmer	Jodhpur	Total
Purchase	41309.102	31012.927	37165.428	109487.456
Ratio of Purchase	37.73	28.33	33.34	100.00
Drawn (M&P)	38538.820	27786.209	34314.448	101139.477
Ratio of Drawn (M&P)	38.10	27.47	34.42	100.00
Total Tr. Loss	6.706	10.404	6.326	7.625
Purchase	41309.102	31012.927	37165.428	109487.456
Tr. Loss	3149.653	2364.611	2833.715	8347.979
Actual Drawn (M&P)	38159.448	28648.316	34331.713	101139.477
Inter Discom	38538.820	27786.209	34814.448	101139.477
	410.684719	-933.264467	522.579748	0.000
NET PURCHASE	41719.786	30079.663	37688.007	109487.456
TRANS. LOSS	3180.966	2293.454	2873.559	8347.979
TRANS. LOSS IN %	7.625	7.625	7.625	7.625

Interdiscom amount

2065744135

-4694320268

2628576133

Note:- Interdiscom amount has been calculated at the average power cost (excluding prior period) of discoms for the financial year 2023-24

Dr. A. K. S. 8/11/24  
Sr. Accounts Officer  
RUVITL, Jaipur