
9 SCHEDULE OF CHARGES

9.1 BACKGROUND

In line with the MERC (Electricity Supply Code and Other Conditions of Supply) Regulations, 2005, TPC-D has sought approval for revision of certain components of “Schedule of Charges” (SoC) for the various services provided to the consumers.

In the past, the approval of Schedule of Charges for TPC-D has been summarised as under:

- (a) Order dated 28 December 2012 in Case No. 47 of 2012
- (b) Order dated 25 July, 2014 in Case No. 83 of 2014 - Actual cost involved for shifting of Service at the request of the consumer
- (c) Order dated 26 June 2015 in Case No. 18 of 2015 - MTR for 2nd MYT Control Period – Revision of Service Connection Charges for three-phase LT Supply with motive power upto 27 HP, or other loads upto 20 kW, to Rs. 3000 per consumer
- (d) Order dated 9 February, 2018 in Case No. 82 of 2017 – Revision in Service connection Charges.

Further, the Commission, vide letter MERC/Tech/Tariff/4688 dated 15 November, 2017 directed all Distribution Licensees to submit their proposal for revision in the Schedule of Charges, if any, along with MTR Petition. Accordingly, TPC-D submitted its proposal for revision in certain existing charges approved in previous Orders and certain additional charges to be included in Schedule of Charges.

This Chapter details the proposal of TPC-D for revision of Schedule of Charges and Commission’s Analysis and ruling in this regard.

9.2 REVISION IN EXISTING SCHEDULE OF CHARGES

9.2.1 Charges for Testing of Meters

TPC-D’s Submission

TPC-D has proposed the revision in Charges for Testing of Meters as shown in the following Table:

Table 9-1: Charges for Testing of Meters as proposed by TPC-D (Rs.)

Type of Meter Testing	Single Phase			Three Phase		
	Approved	Cost Incurred	MTR Petition	Approved	Cost Incurred	MTR Petition
Meter testing at TPC-D Laboratory	200	~1200	600	500	~2500	1250
Meter testing at site on Consumer request	100	750	375	350	1000	500

TPC-D submitted that the meter testing requests are normally during change of season, i.e., when the consumption increases on account of on-set of summer (during May, June). Only around 3% of total requests received for meter testing have some issue with the meter.

Further, TPC-D submitted the actual cost incurred for meter testing at laboratory and at site, as shown in the following Table:

Table 9-2: Actual cost of Meter testing as proposed by TPC-D (Rs.)

Sr. No.	Description	Single Phase Meter			Three Phase Meter		
		No. of Hours required	Manpower Cost per hour	Total Cost per meter	No. of Hours required	Manpower Cost per hour	Total Cost per meter
		Hours	Rs.	Rs.	Hours	Rs.	Rs.
1	Site testing engineer cost	2	200	400	2	200	400
2	Site testing technician cost	2	100	200	2	100	200
3	Transportation & other charges			150			400
4	Total			750			1000

TPC-D submitted that it had made a request for similar charges for meter testing in its MYT Petition. However, the Commission in its MYT Order approved lower charges, stating as under:

“While approving the following Charges, the Commission has also kept in mind that in testing charges should be commensurate with the cost of the meter, and should not create any hindrance to consumers exercising the option of meter testing, especially when the entire testing facility established by the Distribution Licensee is for servicing its own consumers.”

In this regard, TPC-D submitted that though the meter testing facility has been created for the consumers, there are a number of activities carried out apart from meter testing requests

from the consumer, for which the consumer is not separately charged. Further, the intent of proposing increase in charges is not to create hindrance, but to ensure that only consumers with a genuine issue approach for meter testing. This will result in cost saving for the consumer base as a whole.

Commission’s Analysis and Ruling

The Commission, in its Order dated 28 December, 2012 in Case No. 47 of 2012 has approved the Schedule of Charges for testing of meters in such way that consumers can easily exercise such option of meter testing, especially when the entire facility is established by Distribution Licensee for servicing its own consumers. The Commission notes that it has been six years after revision of such charges, and the cost associated with such activities have increased. TPC-D has proposed meter testing charges, which are twice the existing charges. However, though TPC-D has submitted the details of actual cost incurred, no details have been provided for verification of the actual cost incurred. Also, such high increase in meter testing charges would create hindrance for consumers.

Hence, for the purpose of revising the meter testing charges, the Commission has considered the past 6 years average of CPI and WPI indices and accordingly escalated existing charges to the present level. In view of this, meter testing charges approved by the Commission are as under:

Table 9-3: Charges for Testing of Meters as approved by the Commission (Rs.)

Type of Meter Testing	Single Phase			Three Phase		
	Exis ting	MTR Petition	Approved in this Order	Exis ting	MTR Petition	Approved in this Order
Meter testing at TPC-D Laboratory	200	600	260	500	1250	600
Meter testing at site on Consumer request	100	375	130	350	500	450

9.2.2 Charges for Open Access

TPC-D’s Submission

TPC-D submitted that number of OA consumers has increased significantly over the years. The majority of OA consumers are short-term OA consumers. As per Regulation 8 of the DOA Regulations, 2016, the Distribution Licensee is the Nodal Agency for processing OA applications for the consumers connected to the Distribution Licensee and the role of Licensee has significantly increased as per previous Regulations.

Processing fees per application

TPC-D submitted the activities to be undertaken for processing the OA application as under:

Table 9-4: Activities for processing Application for Open Access submitted by TPC-D (Rs.)

Sr. No.	Particulars	Estimated time (Mins)	Cost in Rs.
1	Scrutiny of all documents & application	30	300
2	Sending acknowledgement with check list for remaining documents	20	200
3	Tracking completion of documentation	20	200
4	Scrutinizing the completed application	20	200
5	Sending scan applications & documents to MSLDC and MSEDCL	20	200
6	Follow-up with MSLDC and MSEDCL for concurrence	20	200
7	If document found incomplete by MSLDC/MSEDCL communicate to applicant	30	300
8	Tracking & ensuring complete documentation from applicant	30	300
9	Resending complete documents to MSLDC/MSEDCL	20	200
10	Data Entry	30	300
11	Preparation of No Objection Certificate (NoC)	20	200
12	QC of NoC from signing authority	25	250
13	Scanning & Sending NoC to consumer	25	250
14	Follow-up with applicant for payment of MSLDC charges	20	200
15	Sending payment to MSLDC	20	200
16	Visiting STU & MSEDCL for LTOA & MTOA applications	240	2400
17	Miscellaneous cost- for printing & stationery, courier services, scanning and uploading of the applications and expenditure towards transport	-	1000
	Approximate OA Application processing charges	590	6900

In view of the above, TPC-D proposed Processing Fee of Rs. 7000/- per application. TPC-D submitted that entire expenditure should be recovered as the consumers, who are opting for OA, are subsidizing consumers. TPC-D further proposed an annual increase of these charges linked to the CPI.

Operating charges per month

TPC-D submitted that billing of the consumers, who procure power through OA, is undertaken by TPC-D. The billing procedures include the credit energy sourced on OA, which requires additional activities as compared to the normal billing of Distribution Licensee's consumers. TPC-D enlisted the following additional activities:

- a) Monthly downloading meter data on 15-minute basis.

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- b) Consolidating 15-minute day ahead schedule submitted by the consumer during the month.
 - c) Tracking revision of schedule
 - d) Comparison of every 15-minute drawl with schedule to compute energy charges based on energy drawn under contract/overdrawal/underdrawal.
 - e) Billing the consumers for the units taken on OA and units consumed from TPC-D
 - f) Resolving the queries of the consumers.

TPC-D submitted that since there is an increase in the number of OA consumers and there are lot of complexities involved in processing the monthly OA bills. TPC-D further submitted that, in the case of MSEDCL, the Commission has already approved Rs. 10,000/- per month as operating charges. TPC-D proposed same operating charges as Rs. 10,000/- per month for OA consumers.

Commission’s Analysis and Ruling

The Commission notes that it has approved the OA application processing fee as Rs. 2,500/- per application and operating charges as Rs. 2,500/- per month in its Order dated 28 December, 2012 in Case No. 47 of 2012. The charges were kept low at that time keeping in view lower quantum of OA. However, over the years, number of applications have increased, which requires additional manpower for licensee. Hence, it is required to increase the OA charges from the previous approved level.

Further, the Commission observes that TPC-D has sought more than three time increase in OA charges, which is not justified. The costs proposed by TPC-D for each activity are not verified and it is just apportioning of cost. For increase in charges, the Commission has considered the 6 years average of CPI indices. Accordingly, the Commission has approved OA Charges as shown in the following Table:

Table 9-5: Open Access Charges as approved by the Commission (Rs.)

Sr. No.	Particulars	MTR Petition	Approved in this Order
1	Open access processing fee per application	7,000	3,000
2	Open access operating charges per month	10,000	3,000

9.3 NEW SCHEDULE OF CHARGES

9.3.1 Operative and Administrative Charges for connectivity for Net Metering

TPC-D's Submission

TPC-D submitted that as per MERC (Net Metering for Roof-top Solar Photo Voltaic Systems) Regulations, 2015, the Distribution Licensee shall allow net metering to eligible consumers, who have installed or intend to install a renewable system connected to the network of the Licensee. The number of consumers opting for Net metering have increased to 94 in FY 2017-18.

TPC-D requested the Commission to approve one-time Net Metering Application Processing Charges of Rs. 7,000/-per application, considering that dedicated manpower is required for processing the applications. TPC-D submitted the details of manpower cost as shown in the following Table:

Table 9-6: Cost of processing Net metering Application as submitted by TPC-D (Rs.)

Sr. No.	Description	Manpower Cost per day	Total Cost per Net Meter Application
1	Engineer Man Days	2	6,000
2	Technician man days	2	3,000
3	Application Verification and processing comprising of activities listed above		6,000
	Total		15,000

Commission's Analysis and Ruling

The Commission notes that existing approved Schedule of Charges does not include the charges for processing Net metering application. The Commission finds that there are additional activities are required for processing the net metering application. However, the manpower cost proposed by TPC-D against these activities is high, considering the scope of work.

Further, the Commission notes that Regulation 8.1 of MERC (Net Metering for Roof-top Solar Photo Voltaic Systems) Regulations, 2015 specifies the Registration and Application Fee of Rs. 500/- and Rs. 1,000/- for consumers with sanctioned load or contract demand upto and above 5 kW respectively. The Commission is of view that it has enabled the net metering through Regulations for promotion of rooftop solar and other distributed Renewable Energy applications. The Commission has already approved the Application and Registration fee, hence, there is no need for separate charges for processing of application. In view of this, the Commission rejects the prayer of TPC-D for approval of charges for net metering application processing.

9.3.2 Meter and Panel Cost for Net Metering

TPC-D's Submission

TPC-D submitted that once a consumer applies for net metering, the Distribution Licensee is required to change the meter compatible for Net Metering as per the Net Metering Regulations. The meter and related accessories charges involves cost of net meter, other accessories like box, fuse, etc., based on site and consumer requirement, and changes in the AMR modem, if required.

TPC-D submitted that as per DOA Regulations, 2016, the cost of ABT meter is borne by the consumers. In case of Net Metering, the cost is to be borne by the Distribution Licensee as per the Net Metering Regulations.

TPC-D, in line with the DOA Regulations, 2016, proposed that the Net metering Applicant may opt to purchase a meter either from Distribution Licensee or from any supplier with specifications made in compliance with CEA, at its own cost instead of meters provided by Distribution Licensee.

Commission's Analysis and Ruling

The Commission notes that TPC-D's contentions are based on DOA Regulations. However, the provisions related to net metering are governed by MERC (Net Metering for Roof-top Solar Photo Voltaic Systems) Regulations, 2015. The Commission notes that Regulations 7.5 and 7.6 of MERC (Net Metering for Roof-top Solar Photo Voltaic Systems) Regulations, 2015 specifies as under:

*“7.5. The Eligible Consumer shall install, **at his own cost**, a Solar Generation Meter conforming to the applicable CEA Regulations at an appropriate location to measure the energy generated from the Roof-top Solar PV system, if he is an Obligated Entity and desires that such energy be counted towards meeting its RPO.*

*7.6. The Distribution Licensee shall install, **at its own cost and with the consent of the Eligible Consumer**, a Solar Generation Meter conforming to the applicable CEA Regulations at an appropriate location to measure the energy generated from the Roof-top Solar PV System if it desires that such energy be counted towards meeting its RPO.*

*7.7. The Solar Generation Meter shall be maintained **by the Distribution Licensee at its cost.**” (emphasis added)*

Further, the Commission has issued practice directions for connectivity for change over consumers, wherein it has stated as under:

*“2.5.1 The Consumer may opt for provision of the Net Meter by either the Supply or the Wires Licensee, or **may opt to purchase it himself**. The Net Meter shall be maintained by the Supply Licensee except where it has been provided by the Wires Licensee, in which case it shall be maintained by the latter.”*

The above said Regulations clearly specifies that Distribution Licensee shall install the meter at his own cost. Also, the consumer has an option to opt for his own meter, at his own cost. Hence, the Commission is of the view that there is no need for approval of separate charges for meter and panel for net metering.

In view of this, the Commission rejects the prayer of TPC-D regarding the approval of meter and panel cost for net metering.

9.3.3 Charges for Address Change or Address Correction

TPC-D's Submission

TPC-D submitted that the approved charges do not include Application Registration and Processing Charges for “*Change in address*” or “*Correction in address*”. It further submitted that activities involved for processing application are acknowledgement of application, checking the application and confirming with the documents submitted along with the application, processing in the system, and filing the application.

TPC-D requested the Commission to approve Application Registration and Processing Charges for “*Change in Address*” or “*Correction in Address*” at the same rates approved for Application Registration and Processing Charges for “*Change of Name*” as shown in the Table below:

Table 9-7: Proposed Charges for processing “Address Change” / “Address Correction” Applications as submitted by TPC-D

Sr. No.	Address Change / Address Correction	Rs./Application
A	Single Phase	50
B	Three Phase	50
C	HT Supply	100

Commission’s Analysis and Ruling

TPC-D has sought Application Registration and Processing charges for “*Change in Address*” or “*Correction in Address*”. The address of consumer is related to consumer premise to which electricity is supplied. The address of consumers is fixed as the premises to which supply provided is fixed.

Further, it is unable to apprehend requirement of separate charges for “*Change in Address*” or “*Correction in Address*”. Hence, the Commission rejects TPC-D’s prayer for approval of Application Registration and Processing charges for “*Change in Address*” or “*Correction in Address*”.

9.3.4 Charges of Disconnection of Consumer on consumer’s request

TPC-D’s Submission

TPC-D proposed the charges for Disconnection of consumer on consumer’s request as shown in the following Table:

Table 9-8: Charges of Disconnection of Consumer on consumer’s request as submitted by TPC-D

Consumers	1 phase	3 Phase	HT Meter / CT
Direct Consumers	900	1300	2000
Changeover Consumers	500	500	500

TPC-D submitted that at present there are no Schedule of Charges applicable for Disconnection of consumers on request made by consumers. TPC-D stated that since TPC-D is operating in a parallel licensee scenario, the number of disconnections on consumers’ request are significantly large, at 128 Nos. for Direct consumers and 657 Nos. for change-over consumers for FY 2017-18.

TPC-D submitted the different activities involved in disconnection such as application processing for disconnection of meter, meter management group disconnects the meter and bring it back to the store, network department disconnects the other elements of the network like SFU, cable, panel board, etc., and system entry for moved out consumer. Further, TPC-D submitted that the activities involved in disconnection of direct consumers of TPC-D and change-over consumers is quite different. TPC-D submitted the cost involved in disconnection of meter as Rs. 890/- for single phase meter, Rs. 1290/- for three phase meter, and Rs. 2190/- for CT meter, for Direct consumers. Also, the cost of Rs. 490/- has been submitted for disconnection of change-over consumers.

Commission's Analysis and Ruling

The existing Schedule of Charges does not include separate charges for disconnection on consumer's request. However, the re-connection charges have been approved separately. The Commission notes that nomenclature of re-connection and disconnection may be different, but activities carried out in the field are more or less the same in nature. In order to remove the ambiguities, the Commission in Order dated 28 December, 2012 in Case No. 47 of 2012 has rationalised the activities to be charged. In case of change-over consumer, consumer would pay re-connection charges /other applicable charges to Distribution Licensee, whose supply is being opted for. Hence, the Commission is of the view that all charges are to be levied only at the time of reconnection, irrespective of whether disconnection has been necessitated on the request of the consumer or on account of non-payment of dues by the consumer.

9.4 APPLICABILITY OF REVISED TARIFFS

The revised tariffs approved in this Order will be applicable from 1 September, 2018.

Where there is a billing cycle difference for a consumer with respect to the date of applicability of the revised tariff, the revised tariff should be applied to the consumption on a pro-rata basis. The bills for the respective periods as per the existing and revised tariffs shall be computed based on the pro-rata consumption (units consumed during the respective periods, arrived at on the basis of average unit consumption per day multiplied by the number of days in the respective periods falling under the billing cycle).

The Petition of M/s. The Tata Power Company Ltd. – Distribution in Case No. 69 of 2018 stands disposed of accordingly.

Sd/-
(Mukesh Khullar)
Member

Sd/-
(I.M. Bohari)
Member

Sd/-
(Anand B. Kulkarni)
Chairperson

