FILE No: \_\_\_

#### **AFFIDAVIT**

### BEFORE HON'BLE JOINT ELECTRICITY REGULATORY COMMISSION FOR THE STATE OF GOA & UNION TERRITORIES

CASE No:				
IN THE MATTER OF	:	Petition for Approve MYT Petition & Te	ariff Proposal	
AND				
IN THE MATTER OF THE PETITIONER	:	Lakshadweep Kavaratti - 682555	Electricity	Department,
		Petitioner		
I M D Dharwach Whan S/a	. CI	ari Karra M. V. (agad	51 moore) Es	vocutivo Engineer

- I, M.P Dharwesh Khan, S/o, Shri Koya M. K (aged 51 years), Executive Engineer, Lakshadweep Electricity Department, U.T of Lakshadweep residing at Kavaratti, Lakshadweep, the deponent named above do hereby solemnly affirm and state on oath as under:-
- 1. That the deponent is the Executive Engineer of Lakshadweep Electricity

  Department and is acquainted with the facts deposed to below.

2. I, the deponent named above do hereby verify that the contents of the accompanying petition are based on the records of Lakshadweep Electricity Department maintained in the ordinary course of business and believed by them to be true and I believe that no part of it is false and no material has been concealed there from.

#### Details of enclosures:

Petition for Approval of Petition for Approval of APR for FY 2024-25 and MYT Petition & Tariff Proposal for the control period FY 2025-26 to FY 2029-30.

#### For Lakshadweep Electricity Department

Petitioner

er कार्यकारी अभियंता (वि) / Executive Engineer (ELE) लक्षद्वीप सं.श.प्र / U.T. of Lakshadweep कवारत्ती /Kaveratti-682 555

Dated:

Place: Kavaratti, Lakshadweep,

I, Shuam Chanda Advocate, Executive Magistrate, do hereby declare that the person making this affidavit is known to me through the perusal of records and I am satisfied that he is the same person alleging to be deponent himself.

#### Advocate

EXECUTIVE MAGISTRATE



Petition for Annual Performance Review for FY 2024-25 and MYT Petition & Tariff Proposal for the control period FY 2025-26 to FY 2029-30

> Submitted by: Lakshadweep Electricity Department Administration of Lakshadweep

> > May-2025

#### GENERAL HEADINGS OF PROCEEDINGS

### BEFORE HON'BLE JOINT ELECTRICITY REGULATORY COMMISSION FOR THE STATE OF GOA & UNION TERRITORIES

FILE No:	
CASE No: _	

IN THE MATTER OF

Petition for Approval of APR for FY 2024-25 and

MYT Petition & Tariff Proposal for the control

period FY 2025-26 to FY 2029-30.

AND

IN THE MATTER OF THEPETITIONER

Lakshadweep Electricity Department,

Kavaratti – 682555

.....Petitioner

Lakshadweep Electricity Department (hereinafter referred to as 'LED'), files Petition for Approval of APR for FY 2024-25 and MYT Petition & Tariff Proposal for the control period FY 2025-26 to FY 2029-30.

कार्यकारी अभियंता (वि) Executive Engineer (ELE) लक्षद्वीप सं.श.प्र / U.T. of Lakshadweep कवारत्ती/Kaveratti-682 555

### BEFORE HON'BLE JOINT ELECTRICITY REGULATORY COMMISSION

FOR THE STAT	E OF GOA & UNION TERRITORIE	ES
FILE No:		
CASE No:		
IN THE MATTER OF :	Petition for Approval of APR for MYT Petition & Tariff Proposal period FY 2025-26 to FY 2029-30.	
AND		
IN THE MATTER OF : THE PETITIONER	Lakshadweep Electricity  Kavaratti - 682555	Department,
	Petitioner	
Executive Engineer, Lakshadweep	S/o, Shri Koya .M. K. b Electricity Department, U.T of Lakshad	dweep residing at
affirm and state on oath as under:-		
1. That the deponent is the is acquainted with the facts d	eposed to below.	ity Department and
2. I, the deponent named above	e do hereby verify that the contents of	the accompanying

petition are based on the records of Lakshadweep Electricity Department maintained in the ordinary course of business and believed by them to be true and I believe that no part

of it is false and no material has been concealed there from.

Details of enclosures:

Petition for Approval of Petition for Approval of APR for FY 2024-25 and MYT Petition & Tariff Proposal for the control period FY 2025-26 to FY 2029-30.

For Lakshadweep Electricity Department

Petitioner

Place: Kavaratti, Lakshadweep,

Dated:

कार्यकारी अभियंता (वि) Executive Engineer (ELE) लक्षद्वीप सं.श.प्र / U.T. of Lakshadweep

कवारत्ती /Kavaratti-682 555

SMIVA M CHANDRA Advocate, EXECUTIVE MAGISTRATE do hereby declare that the person making this affidavit is known to me through the perusal of records and I am satisfied that he is the same person alleging to be deponent himself.

#### Advocate

by the deponent who has been identified by the aforesaid Advocate. I have satisfied myself by examining the deponent that he understood the contents of the affidavit which has been read over and explained to him. He has also been explained about section 193 of Indian Penal Code that whoever intentionally gives false evidence in any of the proceedings of the Commission or fabricates evidence for purpose of being used in any of the proceedings shall be liable for punishment as per law.

> EXECUTIVE MAGISTRATE KAVARATTI-682 555

### BEFORE HON'BLE JOINT ELECTRICITY REGULATORY COMMISSION FOR THE STATE OF GOA & UNION TERRITORIES

	FILE No:
	CASE No:
IN THE MATTER OF :	Petition for Approval of APR for FY 2024-25 and MYT Petition & Tariff Proposal for the control period FY 2025-26 to FY 2029-30.
AND	
IN THE MATTER OF THE PETITIONER	: Lakshadweep Electricity Department, Kavaratti-682555, U.T. of Lakshadweep.
	Petitioner

PETITIONER, UNDER JOINT ELECTRICITY REGULATORY COMMISSION FOR THE STATE OF GOA AND UNION TERRITORIES (MULTI YEAR TARIFF) REGULATIONS, 2021 & 2024 READ WITH JERC (CONDUCT OF BUSINESS), REGULATIONS,2009 FILES FOR INITIATION OF PROCEEDINGS BY THE HON'BLE COMMISSION FOR APPROVAL OF APR FOR FY 2024-25 AND MYT PETITION & TARIFF PROPOSAL FOR THE CONTROL PERIOD FY 2025-26 TO FY 2029-30 OF LAKSHADWEEP ELECTRICITY DEPARTMENT (HEREIN AFTER REFERRED TO AS "LED").

#### LAKSHADWEEP ELECTRICITY DEPARTMENT RESPECTFULLY SUBMITS:

- 1. The Petitioner, Lakshadweep Electricity Department has been allowed to function as Distribution Utility for UT of Lakshadweep.
- 2. Pursuant to the enactment of the Electricity Act, 2003, LED is required to submit its Aggregate Revenue Requirement (ARR) and Tariff Petitions as per procedures outlined in section 61, 62 and 64, of EA 2003, and the governing regulations thereof.
- 3. The Joint Electricity Regulatory Commission For Joint Electricity Regulatory Commission for the State of Goa and Union Territories (Generation, Transmission and Distribution Multi Year Tariff) Regulations, 2024 (MYT Regulations) requires the LED to file True-up for previous year, APR for current year & MYT Petition & tariff proposal for the control period FY 2025-26 to FY 2029-30, which shall comprise but not be limited to detailed category-wise sales and demand, power procurement, capital investment, financing, physical targets, cost components etc..
- 4. LED is submitting its Petition for Approval of APR for FY 2024-25 and MYT Petition & Tariff Proposal for the control period FY 2025-26 to FY 2029-30 to Hon'ble Commission on the basis of the Business Plan Petition & principles outlined in tariff regulations notified by the Joint Electricity Regulatory Commission.

कार्यकारी अभियंता (वि) Executive Engineer (ELE) लक्षद्वीप सं.श.प्र/U.T. of Lakshadweep क्यारती/Kavaratti-682 555 5. LED prays to the Hon'ble Commission to admit the attached Petition for APR for FY 2024-25 and MYT Petition & Tariff Proposal for the control period FY 2025-26 to FY 2029-30 and would like to submit that:

#### PRAYERS TO THE HON'BLE COMMISSION:

- 1. The petition provides, inter-alia, LED's approach for formulating the present petition, the broad basis for projections used, summary of the proposals being made to the Hon'ble Commission, performance of LED in the recent past, and certain issues impacting the performance of LED in the Licensed Area.
- Broadly, in formulating the MYT Petition & Tariff Proposal for the control period FY 2025-26 to FY 2029-30, the submission made in the Business Plan & the principles specified in the Joint Electricity Regulatory Commission for the State of Goa and Union Territories (Multi Year Tariff) Regulations, 2024 ("MYT Regulations") have been considered as the basis.
- 3. In order to align the thoughts and principles behind the MYT petition and Tariff Proposal, LED respectfully seeks an opportunity to present their case prior to the approval of the business plan. LED believes that such an approach would go a long way towards providing a fair treatment to all the stakeholders and may eliminate the need for a review or clarification.
- 4. LED may also be permitted to propose suitable changes to the petition and the mechanism of meeting the revenue on further analysis, prior to the final approval by the Hon'ble Commission.

In view of the above, the petitioner respectfully prays that Hon'ble Commission may:

- Approve the APR for FY 2024-25 and MYT Petition & Tariff Proposal for the control
  period FY 2025-26 to FY 2029-30 for LED formulated in accordance with the guidelines
  outlined as per the regulation of Joint Electricity Regulatory Commission relating to
  Distribution Licensee and the principles contained in Tariff Regulations;
- Condone any inadvertent delay/omissions/errors/rounding off differences/shortcomings and LED may please be permitted to add/change/modify/alter the petition;
- Permit LED to file additional data/ information as may be necessary;

 Pass such further and other orders, as the Hon'ble Commission may deem fit and proper, keeping in view the facts and circumstances of the case.

Lakshadweep Electricity Department

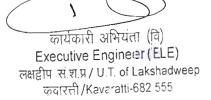
Petitioner

Place: Kavaratti, Lakshadweep

Dated: 01/5/2025

कार्यकारी अभियंता (वि) Executive Engineer (ELE) लक्षद्वीप सं.श.प्र / U.T. of Lakshadweep कवारती/Kavaratti-682 555

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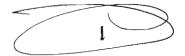
कार्यकारी अभियंता (वि) Executive Engineer (ELE) लक्षद्वीप सं.श.प्र / U.T. of Lakshadweep कवारत्ती/Kavaratti-682 555

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कार्यकारी अभियता (!: Executive Engineer (ELE) लक्षद्वीप सं.श.प्र / U.T. of Lakshadweep कवारती /Kavaratti-682 555

### LIST OF ABBREVIATIONS

Abbreviation	Description
A&G	Administration & General
ARR	Annual Revenue Requirement
CAGR	Compound Annual Growth Rate
CD	Contract Demand
CoS	Cost of Supply
Crs	Crore
D/E	Debt Equity
LED	Electricity Department of Lakshadweep
FY	Financial Year
GFA	Gross Fixed Assets
HT	High Tension
JERC	Joint Electricity Regulatory Commission
KV	Kilovolt
KVA	KilovoltAmps
kWh	kilo Watt hour
LT	Low Tension
LTC	Leave Travel Concession
MU	Million Units
MVA	Million Volt Amps
MW	Mega Watt
O&M_	Operation & Maintenance
PLF	Plant Load Factor
MCLR	Marginal Cost Lending Rate
R&M_	Repairs and Maintenance
RoE	Rate of Return
Rs.	Rupees
S/s	Sub Station
SBI	State Bank of India
T&D	Transmission & Distribution
UT	Union Territory
MYT	Multi Year Tariff

कार्यकारी अभियंता (वि) Executive Engineer (ELE) लक्षद्वीप सं.श.प्र/U.T. of Lakshadweep कवारती/Kavcratti-692 555

#### 1. INTRODUCTION

#### 1.1 Historical Perspective

Lakshadweep Electricity Department ("LED") is responsible for power supply in the union territory. Power requirement of LED is met by own generation station as well as power purchase.

The Union Territory (UT) of Lakshadweep is an archipelago consisting of 12 atolls, three reefs and five submerged banks. It is a uni-district Union Territory with an area of 32 Sq. Kms and is comprised of ten inhabited islands, 17 uninhabited islands attached islets, four newly formed islets and 5 submerged reefs. The inhabited islands are Kavaratti, Agatti, Amini, Kadmat, Kiltan, Chetlat, Bitra, Andrott, Kalpeni, and Minicoy.

Electrification of Lakshadweep Islands was initiated during the second Five Year Plan. Minicoy was the first Island electrified in 1962 followed by Kavaratti Island in 1964, then Amini and Andrott in 1965 and 1966 respectively. Bitra was the last Island electrified in 1982. Initially, power supply was limited to 6 - 12 hours till 1982-83 except in Kavaratti where 24 hours power supply was provided from 1964 itself. Round the clock power supply is provided in all the Islands since 1983.

Starting with modest capacity of 51.6 kilo Watts in 1962 from two Diesel Generating Sets, the generating capacity of Lakshadweep Electricity Department has grown up over the years with increase in demand. The power generated has been steadily increasing over the years to meet the demand of the people in the Islands. Since, the Diesel Generating sets were the only source of power, diesel has to be transported from Calicut (Kerala) in barrels. These barrels are transported in cargo barges to the Islands and stored for use. To alleviate this problem of transportation, oil storage facilities initially at Kavaratti and Minicoy Islands are under installation.

Due to the geographical & topographical peculiarities of these islands including separation by sea over great distances there is no single power grid for the entire electrified island and instead a power house caters independently to the power requirements of area/islands.

Lakshadweep Electricity Department is operates and maintains power generation, transmission & distribution system network in these islands for providing electric power supply to general public and implements various schemes under Plan & Non Plan for augmentation of DG Generating Capacity, establishment of new power houses, renewable sources of power and T&D Systems. Presently, the department is headed by Executive Engineer.

कार्यकारी अभियंता (वि) Executive Engineer (ELE) लक्षद्वीप सं.श.प्र / U.T. of Lakshadweep

ळवारती /Kaunnatti,692,555

#### 1.2 Power Scenario

1.2.1 The salient features about development of electric power supply in these islands are provided below:

#### **ELECTRICITY DEPARTMENT AT A GLANCE (2023-24)**

Total Installed capacity	:	26.262 MW
No. of Power Houses	:	11 Nos
Total Staff strength	:	273 Nos
HT line	:	113.322 Kms
LT line	:	400.364 Kms
Distribution Transformers	:	110 Nos.
No. of consumers	:	27,351 Nos
Annual unit generation	:	63.74 MUs.
Annual unit purchased	:	1.24 MUs.
Total unit sent out	:	63.29 MUs.
Total unit sold	:	56.52 MUs.
T&D loss	:	12.42%
No. of site offices	:	11 Nos.

कार्यकारी अभियंता (वि) Executive Engineer (ELE)

#### 1.3 JERC Formation

In exercise of the powers conferred by the Electricity Act 2003, the Central Government constituted a Joint Electricity Regulatory Commission for all Union Territories to be known as "Joint Electricity Regulatory Commission for Union Territories" as notified on 2<sup>nd</sup> May 2005. Later with the joining of the State of Goa, the Commission came to be known as "Joint Electricity Regulatory Commission for the State of Goa and Union Territories" as notified on 30<sup>th</sup> May 2008.

The Hon'ble Commission is a two-member body designated to function as an autonomous authority responsible for regulation of the power sector in the State of Goa and Union Territories of Lakshadweep, Lakshadweep, Chandigarh, Daman & Diu, Dadra Nagar & Haveli and Puducherry. The powers and the functions' of the Hon'ble Commission are as prescribed in the Electricity Act 2003. The Head Office of the Commission presently is located in the district town of Gurgaon, Haryana and falls in the National Capital Region.

The Joint Electricity Regulatory Commission for the State of Goa and Union Territories started to function with effect from August 2008 with the objectives and purposes for which the Commission has been established. Presently the Hon'ble Commission is framing various regulations as mandated in the Electricity Act 2003 to facilitate its functioning. Some of the Regulations notified by the Hon'ble Commission include the following:

- JERC Conduct of Business Regulations 2009;
- JERC Electricity Supply Code Regulations 2010
  - (a) 1<sup>st</sup> Amendments
  - (b) 2<sup>nd</sup> Amendments
  - (c) Corrigendum dt. 6th Jan. 2014
- JERC State Grid Code Regulations 2010
- JERC Procurement of Renewal Energy Regulations 2010 along with amendments.
- JERC for the State of Goa & UTs (Standard of Performance for Distribution Licensees)
   Regulation, 2015
- JERC (Solar Power -Grid Connected Ground Mounted and Solar Rooftop and Metering) Regulations, 2015
- JERC (Connectivity and Open Access in Intra-State Transmission and Distribution) Regulations, 2017
- JERC for the State of Goa and Union Territories (Multi Year Tariff) Regulations, 2018.
- JERC for the State of Goa and Union Territories (Multi Year Tariff) Regulations, 2021.
- JERC for the State of Goa and Union Territories (Multi Year Tariff) Regulations, 2024.

कार्यकारी अभियंता (वि) Executive Engineer (ELE) लक्षद्वीप संशप्त / U.T. of Lakebadus

#### 1.4 Filing under Tariff Regulations

- 1.4.1 LED has been filing its ARR and Tariff petitions for the past years with the Hon'ble Commission based on the principles outlined by the Hon'ble Commission vide applicable Regulations from time to time. Accordingly, previously Tariff Petitions have been filed under JERC Terms and Conditions of Tariff for Distribution Licensees as notified in 2009, JERC (Multi Year Distribution Tariff) Regulations,2014 JERC (Multi Year Tariff) Regulations,2018 and filed the last petition in accordance with the JERC (Multi Year Tariff) Regulations,2021.
- 1.4.2 LED filed its last petition for determination of Aggregate Revenue Requirement (ARR) & tariff for the FY 2024-25 under section 61, 62 & 64 of the Electricity Act, 2003 and JERC (Multi Year Tariff) Regulations, 2021 on 8<sup>th</sup> December, 2023 against which Tariff Order was issued by the Hon'ble Commission on 10<sup>th</sup> June, 2024.
- 1.4.3 LED filed its petition for approval of Business Plan for the control period FY 2025-26 to FY 2029-30 on 29<sup>th</sup> November, 2024.
- 1.4.4 As per JERC (Multi Year Distribution Tariff) Regulations, 2021, LED is required to file the APR for the third year of the control period FY 2022-23 to FY 2024-25 and as per JERC (Multi Year Distribution Tariff) Regulations, 2024, LED is required to file MYT Petition and Tariff proposal for the control period FY 2025-26 to FY 2029-30.
- 1.4.5 Accordingly, this petition has been prepared in line with the MYT Regulations, 2021 & MYT Regulation, 2024.

कार्यकारी अभियंता (वि)

#### 2. OVERALL APPROACH FOR PRESENT FILING

The Hon'ble Commission had notified JERC (Multi Year Tariff) Regulations, 2021 and JERC (Multi Year Tariff) Regulations, 2024. LED has been filing the ARR petitions for consideration of the Hon'ble Commission in the formats laid down for providing information relating to past, present and future performance. In this petition, LED is filing the Annual Performance Review for FY 2024-25 along with MYT Petition & Tariff proposal for the control period FY 2025-26 to FY 2029-30.

- 2.1. Annual Performance Review for the FY 2024-25
- 2.1.1. As specified in the Tariff Regulations, the Hon'ble Commission shall undertake the Annual Performance Review by considering variations between the approved and revised estimates of sale of electricity, income and expenditure for the relevant year.
- 2.1.2. Accordingly, LED is filing this Annual Performance Review petition for the year FY 2024-25 based on the actual performance during the 1st half of the year and the revised estimates for the second half of the year of purchase and sales.
- 2.2. MYT Petition & Tariff Proposal for the control period FY 2025-26 to FY 2029-30.
- 2.2.1. LED is filing the MYT Petition for the control period FY 2025-26 to FY 2029-30 for approval of ARR & Tariff for the FY 2025-26 based on the MYT Regulations, 2024.
- 2.2.2 APR for FY 2024-25 and MYT Petition & Tariff proposal for the control period FY 2025-26 to FY 2029-30 have been carried out separately and details of the same are presented separately.



#### 3. Annual Performance Review for the FY 2024-25

#### 3.1. Background to FY 2024-25 Tariff Petition

3.1.1. LED filed the 3rd MYT Petition for the control period FY 2022-23 to FY 2024-25. FY 2024-25 is the last year of the control period. The ARR for the control period was approved by the Hon'ble Commission vide MYT order Dt. 31st March, 2022 along with the tariff for the FY 2022-23. Further, ARR for the FY 2024-25 was revised & approved by the Hon'ble Commission vide order Dt. 10th June, 2024. Regulation 12(3) of the JERC MYT Regulations, 2021 provides as follows:

"Annual Performance Review: a comparison of the revised estimates of performance targets of the Applicant for the current Financial Year with the approved forecast in the Tariff Order corresponding to the Control Period for the current Financial Year subject to prudence check;"

In accordance with the above Regulation, LED is filing for Annual Performance Review for the FY 2024-25.

3.1.2. This chapter summarizes each of the components of ARR for FY 2024-25 and requests the Hon'ble Commission to review the performance for FY 2024-25. The Annual Performance Review for FY 2024-25 is based on actual data/ information for the FY 2023-24 & for the first 6 months (First Half – H1) of the FY 2024-25 and estimation/projections for remaining 6 months (Second Half – H2) of the FY 2024-25, wherever applicable. The projections for the second 6 months are arrived at based on the performance over the first half data/ information.

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#### 3.2. Approved ARR for the FY 2024-25

3.2.1. The summary of the charges for FY 2024-25 as approved by the Hon'ble Commission in the MYT Order is tabulated below:

Table 3.1: ARR approved for the FY 2024-25

(Rs. in crore)

	E8-54-19-1-5	FY 2024-25	
S. No.	Particulars	Approved in T.O. dated 31st March 2022	Approved in T.O. dated 10th June 2024
1	Power Purchase Cost	0.00	0.00
2	Fuel Cost	147.32	192.62
3	REC Cost	0.00	0.49
4	O&M Expenses	47.54	50.55
5	Depreciation	7.10	5.82
6	Interest and Finance charges	1.71	0.72
7	Interest on working capital	0.78	0.35
8	Return on Equity	11.27	9.49
9	Interest on Security Deposit	0.04	0.53
10	Income Tax	0.00	0.00
11	Total Revenue Requirement	215.76	260.57
12	Less: Non-Tariff Income	1.48	1.48
13	Net Revenue Requirement	214.28	259.09

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#### 3.3. Number of consumers

3.3.1. Hon'ble Commission has approved the number of consumers for the FY 2024-25 in the tariff order Dt. 10.06.2024. However, on the basis of the actual number of consumers for the FY 2023-24 & number of consumers during the first half of FY 2024-25, LED has recalculated the number of consumers for the FY 2024-25 considering the CAGR over past years. The revised estimates of category wise number of consumers for FY 2024-25 and comparison with the approved numbers are shown below:

FY 2024-25 Estimated Approved in Approved in Actual SI. No. Category T.O. dated 31st T.O. dated for FY 6 March 2022 10th June 2024 Months 2024-25 3 2 5 1 4 6 21618 20863 Domestic 21525 21293 1 Commercial 5237 5474 4643 4953 2 Govt. Connection 1173 1082 1070 1098 3 4 Industrial 368 366 363 369 HT Consumers 5 15 9 8 8 Public Lighting 76 72 6 69 69 Temporary 136 0 270 270 Connection 7 8 Total 28623 28528 27286 28061

Table 3.2: Number of consumers for the FY 2024-25

3.3.2. It is requested to the Hon'ble Commission to approve the number of consumers as submitted in the above table for FY 2024-25.

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#### 3.4. Connected Load

5.4.1 Hon'ble Commission has approved the connected load for the FY 2024-25 in the tariff order Dt. 10.06.2024. However, on the basis of the actual connected load for the FY 2023-24 & load during the first half of FY 2024-25, LED has recalculated the connected load for the FY 2024-25 considering the CAGR over past years. The revised estimates of category wise connected load for FY 2024-25 and comparison with the approved numbers are shown below:

Table 3.3: Connected Load for the FY 2024-25

in kVA

			FY 2024-25				
Sl. No.	Category	Approved in T.O. dated 31st March 2022	Approved in T.O. dated 10th June 2024	Actual 6 Months	Estimated for FY 2024-25		
1	2	. 3	4	5	6		
1	Domestic	101428	75557	89752	92135		
2	Commercial	8213	9164	11754	11935		
3	Govt. Connection	18434	11253	13149	13242		
4	Industrial	3832	3481	4067	4243		
5	HT Consumers	1633	904	1226	1347		
6	Public Lighting	284	261	290	292		
7	Temporary Connection	273	0	346	346		
8	Total	134097	100620	120584	123540		

5.4.2 It is requested to the Hon'ble Commission to approve the connected load as submitted in the above table for FY 2024-25.

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#### 3.5 Energy Sales

3.5.1 Hon'ble Commission has approved the Energy Sales for the FY 2024-25 in the tariff order Dt. 10.06.2024. However, on the basis of the actual sales for the FY 2023-24 & sales during the first half of FY 2024-25, LED has recalculated the sales for the FY 2024-25 considering the CAGR over past years. The revised estimates of category wise energy sales for FY 2024-25 and comparison with the approved numbers are shown below:

Table 3.4: Energy Sales for the FY 2024-25

(In MUs)

			FY 2024-	25	
S. No.	Categories	Approved in T.O. dated 31st March 2022	Approved in T.O. dated 10th June 2024	Actual 6 Months	Estimated for FY 2024-25
1	Domestic	47.15	37.72	21.62	40.59
2	Commercial	4.01	4.47	2.58	8.54
3	Govt. Connection	7.28	7.54	4.43	5.38
4	Industrial	0.44	0.46	0.36	0.74
5	HT Consumers	1.25	2.76	0.97	2.14
6	Public Lighting	1.03	0.86	0.40	0.80
7	Temporary Connection	0.09	0.12	0.04	0.09
8	Grand Total	61.25	53.92	30.42	58.28

3.5.2 It is requested to the Hon'ble Commission to approve the sales as submitted in the above table for FY 2024-25.

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#### 3.6 Energy Balance

3.6.1 Hon'ble Commission has approved the Energy Balance and T&D loss for the FY 2024-25 in the tariff order Dt. 10.06.2024. However, on the basis of the actual figures during the first half of FY 2024-25, LED submits the revised estimates for FY 2024-25. A comparison of the revised estimates with earlier approved numbers is shown below:

Table 3.5: Energy Balance for the FY 2024-25

		Car and St. A.	FY 2024-2	25	
SI. No.	Particulars	Approved in T.O. dated 31st March 2022	Approved in T.O. dated 10th June 2024	Actual 6 Months	Estimated for FY 2024-25
A	ENERGY REQUIREMENT (MU)				
i)	Total Sales within UT	61.25	53.92	30.42	58.28
ii)	Transmission & Distribution Losses (%)	9.25	9.25	9.85	9.25
iii)	T&D Losses (MU)	6.24	5.50	3.32	5.94
	Total Energy Requirement (for sale to retail consumers)	67.49	59.42	33.74	64.22
В	ENERGY AVAILABILITY AT PERIPHERY				
i)	Solar Power Purchase	0.00	0.00	1.17	3.44
ii)	Solar Renewable Generation	13.22	2.12	0.01	0.01
iii)	HSD Generation (Net)	54.27	57.30	32.55	60.77
	Total Energy Availability	67.49	59.42	33.74	64.22
	ENERGY SURPLUS/(GAP)	0.00	0.00	0.00	0.00

3.6.2 LED requests the Hon'ble Commission to approve the Energy Balance and T&D Loss as submitted above for FY 2024-25.

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#### 3.7 Cost of fuel

- 3.7.1 The energy requirement of LED is met from own generation. There is no availability of power from Central Generating Stations or from other sources/ open market/ power exchanges etc.
- 3.7.2 Hon'ble Commission has approved the Fuel Cost for the FY 2024-25 in the tariff order Dt. 10.06.2024. However, on the basis of the cost figures during the first half of FY 2024-25, LED submits the revised estimates for FY 2024-25. A comparison of the revised estimates with earlier approved numbers is shown below:

Table 3.6: Cost of fuel for the FY 2024-25

Rs. In Cr.

		FY 2024-25				
Sr.No.	Particulars	Approved in T.O. dated 31st March 2022	Approved in T.O. dated 10th June 2024	Actual 6 Months	Estimated for FY 2024-25	
1	2	3		4	5	
1	Cost of HSD	146.44	191.36	97.20	197.85	
2	Cost of Lube Oil	0.88	1.27	0.80	1.50	
3	Total	147.32	192.62	98.00	199.34	

3.7.3 The Hon'ble Commission is requested to approve the fuel cost as submitted above for FY 2024-25.

#### 3.8 GFA, Capitalisation & Depreciation

- 3.8.1 Hon'ble Commission has approved the GFA for the FY 2024-25 in the tariff order Dt. 10.06.2024. LED has considered the actual GFA as on 31.03.2024 and actual additions during 1<sup>st</sup> half of FY 2024-25 & estimated additions during the 2<sup>nd</sup> half of the FY 2024-25 to arrive at the closing GFA for the year.
- 3.8.2 In view of the revision of the GFA as above, the depreciation for the FY 2024-25 is also recalculated in accordance with the MYT Regulations,2021. The approved and the revised projections of depreciation for the FY 2024-25 is provided below.

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Table 3.7: GFA, Capitalisation & Depreciation for the FY 2024-25

(Rs. in crore)

	FY 2024-25					
Particulars	Approved in T.O. dated 31st March 2022	Approved in T.O. dated 10th June 2024	Estimated for FY 2024-25			
Gross Opening GFA	229.09	198.38	200.36			
Less: Assets depreciated upto 90% till FY 2020-21	22.92	22.92	24.34			
Net Opening GFA	206.17	175.45	176.01			
Addition	11.50	9.80	11.76			
Closing GFA	217.67	185.26	187.77			
Average GFA	211.92	180.36	181.89			
Depreciation Rate	3.35%	3.23%	4.53%			
Depreciation	7.10	5.82	8.24			

3.8.2.1 LED requests the Hon'ble Commission to kindly approve the same for APR for FY 2024-25.

#### 3.9 Operation & Maintenance expenses

- 3.9.1 Operation & Maintenance Expenses consists of three elements viz Employee Expenses, A&G Expense and R&M Expense:
  - Employee expenses comprise of salaries, dearness allowance, bonus, terminal benefits in the form of pension & gratuity, leave encashment and staff welfare expenses
  - Administrative expenses mainly comprise of rents, telephone and other communication expenses, professional charges, conveyance and travelling allowances and other debits.
  - Repairs and Maintenance Expenses go towards the day to day upkeep of the distribution network of the Company and form an integral part of the Company's efforts towards reliable and quality power supply as well as in the reduction of losses in the system.

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#### 3.9.2 Employee Expenses

- 3.9.2.1 The Hon'ble Commission has approved the Employee cost for the FY 2024-25 based on the approved norms in accordance with Regulation 61 of the MYT Regulations, 2021.
- 3.9.2.2 LED is proposing the revised estimates of the employee cost based on the actual expenses for the FY 2023-24 & 1<sup>st</sup> Half (April,24 to September,24) of the FY 2024-25. The cost as approved by the Hon'ble Commission for the FY 2024-25 and the revised proposal for the year is given below:

Table 3.8: Employee Expenses for the FY 2024-25

(Rs. in crore)

	FY 2024-25				
Particulars	Approved in T.O. dated 31st March 2022	Approved in T.O. dated 10th June 2024	Actual 6 Months	Estimated for FY 2024-25	
Employee Expenses	32.26	24.27	13.63	24.39	
Total Employee Expenses	32.26	24.27	13.63	24.39	

3.9.2.3 LED requests the Hon'ble Commission to kindly approve the same for APR for FY 2024-25.

#### 3.9.3 Repair & Maintenance Expenses

- 3.9.3.1 The Hon'ble Commission has approved the Repair & Maintenance Expenses for the FY 2024-25 based on the approved norms in accordance with Regulation 61 of the MYT Regulations, 2021.
- 3.9.3.2 LED is proposing the revised estimates of the Repair & Maintenance Expenses based on the actual expenses for the FY 2023-24 & 1<sup>st</sup> Half (April,24 to September,24) of the FY 2024-25 The cost as approved by the Hon'ble Commission for the FY 2024-25 and the revised proposal for the year is given below:

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Table 3.9: Repair & Maintenance Expenses for the FY 2024-25

(Rs. in crore)

	FY 2024-25					
Particulars	Approved in T.O. dated 31st March 2022	Approved in T.O. dated 10th June 2024	Actual 6 Months	Estimated for FY 2024-25		
R & M Expenses	9.37	23.58	6.38	8.60		
Total R & M Expenses	9.37	23.58	6.38	8.60		

3.9.3.3 LED requests the Hon'ble Commission to kindly approve the same for APR for FY 2024-25.

#### 3.9.4 Administrative & General Expenses

- 3.9.4.1 The Hon'ble Commission has approved the Administrative & General Expenses for the FY 2024-25 based on the approved norms in accordance with Regulation 61 of the MYT Regulations, 2021.
- 3.9.4.2 LED is proposing the revised estimates of the Administrative & General Expenses based on the actual expenses for the FY 2023-24 & 1<sup>st</sup> Half (April,24 to September,24) of the FY 2024-25 The cost as approved by the Hon'ble Commission for the FY 2024-25 and the revised proposal for the year is given below:

Table 3.10: Administrative & General Expenses for the FY 2024-25

(Rs. in crore)

		FY 2024-	25	
Particulars	Approved in T.O. dated 31st March 2022	Approved in T.O. dated 10th June 2024	Actual 6 Months	Estimated for FY 2024- 25
A & G Expenses	<u>5.91</u>	2.70	0.16	2.39
Total A & G Expenses	5.91	2.70	0.16	2.39

3.9.4.3 LED requests the Hon'ble Commission to kindly approve the same for APR for FY 2024-25.



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3.9.5 O&M expenses summary - Based on the foregoing paragraphs, the O&M expenses for the year FY 2024-25 are summarised below:

Table 3.11: O&M expenses summary for the FY 2024-25

(Rs. in crore)

	FY 2024-25					
Particulars	Approved in T.O. dated 31st March 2022	Approved in T.O. dated 10th June 2024	Actual 6 Months	Estimated for FY 2024-25		
Employee Expenses	32.26	24.27	13.63	24.39		
R & M Expenses	9.37	23.58	6.38	8.60		
A & G Expenses	5.91	2.70	0.16	2.39		
Total O & M Expenses	47.54	50.55	20.16	35.38		

3.9.5.1 LED requests the Hon'ble Commission to kindly approve the same for APR for FY 2024-25.

#### 3.10 Interest & Finance charges

- 3.10.1 The LED being a Government Department, the entire capital employed till date has been funded through equity infusion by the Central Government through budgetary support without any external borrowings. LED has considered the GFA as on 31.03.2024 and estimated additions during the FY 2024-25 to arrive at the closing GFA for the year. The normative loan for the FY 2024-25 has been arrived in accordance with the Regulation 27 of the MYT Regulations, 2021.
- 3.10.2 It is submitted that Regulation 29.4 of MYT Regulations,2021 provides as below:

"Provided further that if the Transmission Licensee or the Distribution Licensee does not have actual loan, then (1) Year State Bank of India (SBI) MCLR / any replacement thereof as notified by RBI for the time being in effect applicable for (1) Year period, as may be applicable as on 1st April of the relevant Year plus 100 basis points shall be considered as the rate of interest for the purpose of allowing the interest on the normative loan."

In view of the above Regulation, LED proposes to revise the interest charges based on the State Bank of India (SBI) MCLR – 1 year tenor as on 01.04.2024. The State Bank of India (SBI) MCLR – 1 year tenor as on 01.04.2024 was 8.65%. Accordingly, interest rate of 9.65% (8.65%+1%) has been considered for projecting the interest charges for the FY 2024-25.

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Table 3.12: Interest & Finance charges for the FY 2024-25

(Rs. in crore)

	FY 2024-25				
Particulars	Approved in T.O. dated 31st March 2022	Approved in T.O. dated 10th June 2024	Estimated for FY 2024-25		
Opening Normative loan	20.89	7.08	0.00		
Add: Normative Loan during the year	8.05	6.86	8.23		
Less: Normative Repayment equal to Depreciation	7.10	5.82	8.23		
Closing Normative Loan	21.84	8.12	0.00		
Average Normative Loan	21.37	7.60	0.00		
Interest Rate	8.00%	9.50%	9.65%		
Interest on Loan	1.71	0.72	0.00		

3.10.3 LED requests the Hon'ble Commission to kindly approve the same for APR for FY 2024-25.

#### 3.11 Interest on Working Capital

3.11.1 The Hon'ble Commission has approved the Interest on Working Capital for the FY 2024-25 based on the cost parameters approved for MYT Control Period in accordance with the Regulation 64 of the MYT Regulations, 2021. The Regulation provides as follows:

The Distribution Licensee shall be allowed interest on the estimated level of Working Capital for the Distribution Wires Business for the financial Year, computed as follows:

- a) Operation and maintenance expenses for one (1) month; plus
- b) Maintenance spares at 40% of R&M expenses for one (1) month; plus
- a) Receivables equivalent to two (2) months of the expected revenue from Consumers at the prevailing tariffs;

Less

- b) Power Purchase cost for one (1) month; plus
- c) Amount, if any, held as security deposits
- 3.11.2 In view of the above Regulations, LED has recalculated the working capital requirement for the FY 2024-25.
- 3.11.3 Regulation 31.4 of MYT Regulations provides as follows:

"The rate of interest on Working Capital shall be equal 1 Year State Bank of India (SBI) MCLR / any replacement thereof as notified by RBI for the time being in effect applicable for 1 Year period, as may be applicable as on 1st April of the financial Year in which the Petition is filed plus 200 basis points."

- 3.11.4 In view of the above Regulation, LED proposes to revise the interest charges based on the State Bank of India (SBI) MCLR 1 year tenor as on 01.04.2021. The State Bank of India (SBI) MCLR 1 year tenor as on 01.04.2021 was 8.65%. Accordingly, interest rate of 10.65% (8.65%+2%) has been considered for projecting the interest charges for the FY 2024-25.
- 3.11.5 LED has calculated the revised interest on working capital for the FY 2024-25 in accordance with the above submission. The same is provided below along with the approved figures for the year:

Table 3.13: Interest on Working Capital for the FY 2024-25

(Rs. in crore)

	FY 2024-25				
Particulars	Approved in T.O. dated 31st March 2022	Approved in T.O. dated 10th June 2024	Estimated for FY 2024-25		
O&M expenses - 1 month	3.96	4.21	2.95		
Maintenance Spares @ 40% of R&M expense - I month	0.31	0.78	0.29		
Two Months Receivables	5.35	7.01	7.59		
Less: Amount held as Security Deposits	0.97	8.66	7.32		
Total Working Capital	8.66	3.35	3.26		
Rate of Interest on Working Capital	9.00%	10.50%	10.65%		
Interest on Working Capital	0.78	0.35	0.35		

3.11.6 LED requests the Hon'ble Commission to kindly approve the same for APR for FY 2024-25.

#### 3.12 Interest on Security deposits

3.12.1 Hon'ble Commission has approved the Interest on Security deposits on the balance of Security Deposit from the consumers during the FY 2024-25 in the order Dt. 10.06.2024. LED has recalculated the interest on Security Deposits based on the estimated security deposits for the FY 2024-25 and applicable bank rate of 6.5% and as approved by the Hon'ble Commission in the tariff order. The cost as approved by the Hon'ble Commission for the FY 2024-25 & the revised cost is given below:

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Table 3.14: Interest on Security deposits for the FY 2024-25

(Rs. in crore)

The state of the s	FY 2024-25				
Particulars	Approved in T.O. dated 31st March 2022	Approved in T.O. dated 10th June 2024	Estimated for FY 2024- 25		
Opening Security Deposit	0.96	7.19	6.58		
Net Addition during the year	0.01	1.46	0.74		
Refund during the year	0.00	0.00	0.00		
Closing Security Deposit	0.97	8.66	7.32		
Average Security Deposit	0.965	7.915	6.95		
RBI Bank Rate	4.25%	6.75%	6.75%		
Interest on Consumer Security Deposit	0.04	0.53	0.47		

3.12.2 LED requests the Hon'ble Commission to kindly approve the same for APR for FY 2024-25.

#### 3.13 Return on Equity

- 3.13.1 The LED being a Government Department, the entire capital employed till date has been funded through equity infusion by the Central Government through budgetary support. LED has considered the GFA as on 31.03.2024 and estimated additions during the FY 2024-25 to arrive at the closing GFA for the year. The normative Equity for the FY 2024-25 has been considered at 30% of the above GFA in accordance with the Regulation 28 of the MYT Regulations, 2021.
- 3.13.2 Further, Regulation 28 of MYT Regulations, 2021 provides as follows:

"The return on equity for the Retail Supply Business shall be allowed on the equity capital determined in accordance with Regulation 27 for the assets put to use, at the rate of sixteen (16) per cent per annum...."

3.13.3 In view of the above, the revised Return on Equity for the FY 2024-25 is calculated as below:

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Table 3.15: Return on Equity for the FY 2024-25

(Rs. in crore)

	FY 2024-25			
Particulars	Approved in T.O. dated 31st March 2022	Approved in T.O. dated 10th June 2024	Estimated for FY 2024-25	
Opening Equity Amount	68.72	59.59	59.83	
Equity Addition during year (30% of Capitalization)	3.45	2.94	3.53	
Closing Equity Amount	72.17	62.53	63.35	
Average Equity Amount	70.45	61.06	61.59	
Rate of Return on Equity	0.00%	0.00%	16.00%	
Return on Equity	11.27	9.49	9.85	

3.13.4 LED requests the Hon'ble Commission to kindly approve the same for APR for FY 2024-25.

#### 3.14 Provision for Bad & Doubtful Debts

3.14.1 Regulation 63 of MYT Regulations, 2021 provides that the Bad debt shall be allowed based on actual write off. The same is reproduced below:

".....Provided that the Commission shall true up the bad debts written off in the Aggregate Revenue Requirement, based on the actual write off of bad debts excluding delayed payment charges waived off, if any, during the year, subject to prudence check...."

3.14.2 In view of the above LED is not proposing any provision for Bad Debt. LED shall submit the claim towards bad and doubtful debts when audited figures are available for the consideration of the Hon'ble Commission at the time of true-up. Hon'ble Commission may kindly allow the same.

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#### 3.15 Non-Tariff Income

3.15.1 Hon'ble Commission has approved the Non-Tariff Income (NTI) for the FY 2024-25 in the Tariff Order Dt. 10.06.2024. LED has revised the estimated NTI based on the actual NTI during the FY 2023-24. The revised estimates of NTI for FY 2024-25 and comparison with the approved numbers are shown below:

Table 3.16: Non-Tariff Income for the FY 2024-25

(Rs. in crore)

	FY 2024-25		
Particulars	Approved in T.O. dated 31st March 2022	Approved in T.O. dated 10th June 2024	Estimated for FY 2024- 25
Non-Tariff Income	1.48	1.48	0.58

3.15.2 LED requests the Hon'ble Commission to kindly approve the same for APR for FY 2024-25.

#### 3.16 Aggregate Revenue Requirement

3.16.1 The Aggregate Revenue Requirement for FY 2024-25 as approved by the Hon'ble Commission and the calculation for Aggregate Revenue Requirement on the basis of revised estimates as submitted in the above sections for FY 2024-25 is shown below:

Table 3.17: Aggregate Revenue Requirement for the FY 2024-25

(Rs. in crore)

	Particulars	FY 2024-25			
S. No.		Approved in T.O. dated 31st March 2022	Approved in T.O. dated 10th June 2024	Estimated for FY 2024-25	
1	Power Purchase Cost	0.00	0.00	2.96	
2	Fuel Cost	147.32	192.62	199.34	
3	O&M Expenses	47.54	50.55	35.38	
4	Depreciation	7.10	5.82	8.24	
5	Interest and Finance charges	1.71	0.72	0.00	
6	Interest on working capital	0.78	0.35	0.35	
7	Return on Equity	11.27	9.49	9.85	
8	Interest on Security Deposit	0.04	0.53	0.47	
9	Income Tax	0.00	0.00	0.00	
10	Total Revenue Requirement	215.76	260.57	256.59	
11	Less: Non-Tariff Income	1.48	1.48	0.58	
12	Net Revenue Requirement	214.28	259.09	256.02	

3.16.2 LED requests the Hon'ble Commission to kindly approve the same for APR for FY 2024-25.

#### 3.17 Revenue from sale of Power at Existing Tariff

3.17.1 The revised estimate of Revenue from Tariff for FY 2024-25 as compared with the figures approved by the Hon'ble Commission in the tariff order Dt. 10.06.2024 is shown in the table below:

Table 3.18: Revenue from sale of Power at Existing Tariff for the FY 2024-25

(Rs. in crore)

S. No.	Particulars	FY 2024-25			
		Approved in T.O. dated 10th June 2024	Actual 6 Months	Estimated for FY 2024-25	
Α	Domestic	17.85	7.64	20.73	
В	Commercial	3.67	2.20	10.94	
С	Govt. Connection	9.35	4.08	8.70	
D	Industrial	0.60	0.32	1.07	
Е	HT Consumers	3.08	0.96	3.13	
F	Public Lighting	0.75	0.27	0.90	
G	Temporary	0.12	0.24	0.07	
	Total	35.42	15.72	45.54	

3.17.2 LED requests the Hon'ble Commission to kindly approve the same for APR for FY 2024-25.

#### 3.18 Revenue Gap for FY 2024-25

3.18.1 The Revenue Gap as approved by the Hon'ble Commission and as calculated on the basis of the APR for the FY 2024-25 is shown in the table below:

Table 3.19: Revenue Gap for the FY 2024-25

(Rs. in crore)

		FY 2024-25		
S. No.	Particulars	Approved in T.O. dated 31st March 2022	Approved in T.O. dated 10th June 2024	Estimated for FY 2024-25
1	Net Revenue Requirement	214.28	259.09	256.02
2	Revenue from Sale of Power at Existing Tariff	0.00	35.42	45.54
3	Net GAP during the year	214.28	223.67	210.47
4	Add: Previous Year Gap	0.00	0.00	0.00
5	Total Gap	214.28	223.67	210.47

3.18.2 LED requests the Hon'ble Commission to kindly approve the same for APR for FY 2024-25.

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# 4. MYT PETITION FOR CONTROL PERIOD I.E. FY 2025-26, FY2026-27, FY2027-28, FY2028-29 AND FY2029-30.

This section outlines the MYT Petition of the LED for control period i.e. FY2025-26, FY2026-27, FY2027-28, FY2028-29 AND FY2029-30, which takes into consideration:

- i. The various parameters as per the Business Plan
- ii. Actual Performance in previous years;
- iii. Estimated Performance for FY 2024-25 based on the Actual performance for the first half year of the FY 2024-25;
- iv. Projection based on the Actual performance of previous years and estimated performance in FY 2024-25;
- v. Principles outlined in Tariff Regulations of JERC.
- vi. JERC (Retail Supply Tariff Structure) Guideline 2024

Past trends have been taken into cognizance in case of certain elements as deemed necessary. The present section has been structured in the following manner:

- Energy Requirement
  - o Sales Projections
  - o Loss Trajectory
  - o Energy Balance
- Capital Expenditure and capitalization
  - Capital Expenditure
  - Asset Capitalisation
- Determination of the Aggregate Revenue Requirement
  - Power Generation
  - o Operation and Maintenance Expenses
  - o Depreciation
  - o Interest charges (including interest on working capital)
  - o Provision for Bad and Doubtful Debts
  - o Return on Equity
  - o Non-Tariff Income

LED had projected the category wise energy sales, connected load & consumers based on the existing categories of consumers as approved by the Hon'ble Commission in previous tariff Orders and the petition was accordingly submitted to the Hon'ble Commission on 30<sup>th</sup> December, 2024.

Further, the Hon'ble Commission has notified JERC (Retail Supply Tariff Structure) Guideline 2024. The Hon'ble Commission directed LED to revise the petition by considering the consumer categories as defined in the JERC (Retail Supply Tariff Structure) Guideline 2024.

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Accordingly, LED has regrouped/categorised the energy sale, connected load & consumers based on the new Retail Supply Tariff Structure as notified by the Hon'ble Commission.

It is submitted that total energy sales, connected load & consumers remains same as projected and submitted in the original petition, only the same has been regrouped/recategorized as per the new Retail Supply Tariff Structure.

LED has followed the following methodology for recategorizing the energy sale, connected load & consumers.

- i. The actual data of energy sales, connected load & consumers for the FY 2023-24 has been analysed based on the records.
- ii. The actual consumers of FY 2023-24 have been regrouped & re categorised as per the category applicability defined in the new Retail Supply Tariff Structure by transferring the consumers from existing category to the revised tariff categories/structure.
- iii. Wherever, exact matching of consumers of the existing category vis-a-vis new tariff structure could not be done due to insufficiency of details, suitable assumptions have been done with objective to keep the consumers in applicable category based on the past trends.
- iv. The category wise energy sales, connected load & consumers shall be again analysed based on actual figures at the end the current financial year (FY 2025-26) and changes as may be required shall be submitted to the Hon'ble Commission for consideration.

## 4.1 Energy Requirement

The energy requirement of the license area is determined based on the expected sales in the area during the period under consideration and the expected distribution losses in the network. Accordingly, the energy requirement projected by the LED for the control period i.e. FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY2029-30 is as given in the succeeding paragraphs.

#### 4.1.1 Approach for Sales Projection

LED has proposed the category wise sales in the Business plan for the control period FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY2029-30, LED has considered the same in the instant petition for determining ARR for the control period.

#### 4.1.2 Category wise Sales

The category wise sales for the control period FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY2029-30 as per previous tariff structure is provided below:

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Table 4.1: Energy Sales-FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY2029-30

(in MU's)

S. No.	Categories	2025-26 (Projected)	2026-27 (Projected)	2027-28 (Projected)	2028-29 (Projected)	2029-30 (Projected)	
]	Domestic	41.42	42.26	43.12	44.00	44.90	
2	Commercial	8.97	9.42	9.89	10.38	10.90	
3	Govt. Connection	5.64	5.93	6.22	6.53	6.86	
4	Industrial	0.83	0.92	1.03	1.15	1.28	
5	HT Consumers	2.34	2.55	2.79	3.05	3.34	
6	Public Lighting	0.83	0.85	0.88	0.91	0.93	
7	Agriculture	0.07	0.11	0.16	0.23	0.32	
8	Others Temporary						
	Supply	0.10	0.10	0.11	0.11	0.12	
9	Total	60.19	62.15	64.21	66.37	68.66	

The category wise sales for the control period FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY2029-30 as per the new Retail Supply Tariff Structure is provided below:

Table 4.2: Energy Sales in the new Retail Supply Tariff Structure (in MU's)

S. No.	Categories	2025-26 (Projected)	2026-27 (Projected)	2027-28 (Projected)	2028-29 (Projected)	2029-30 (Projected)
1	DOMESTIC SERVICE (DS)					
i	LTDS-I: Connected Load Based	0	0	0	0	0
ii	LTDS-II: Demand Based	42.14	43.08	44.05	45.05	46.06
iii	LTDS-III: Demand Based	2.22	2.27	2.32	2.37	2.42
2	NON-DOMESTIC SERVICE (NDS)					
i	NDS - I: Demand Based	6.90	7.24	7.61	7.99	8.39
ii	NDS - II: Demand Based	1.28	1.35	1.41	1.49	1.56
iii	NDS - III: Demand Based	0	0	0	0	0
iv	NDS - IV: Demand Based	2.53	2.66	2.79	2.93	3.08
٧	NDS - V: Connected Load Based	0.14	0.14	0.15	0.15	0.15
3	AGRICULTURAL SERVICE (AS)					
i	LTAS - I: Connected Load Based	0.07	0.11	0.16	0.23	0.32
ii	LTAS - II: Demand Based	0	0	0	0	0
jii	LTAS - III: Demand Based	0	0	0	0	0
4	INDUSTRIAL SERVICES (LTIS)	0.83	0.92	1.03	1.15	1.28
5	PUBLIC UTILITY SERVICES					
i	LTPS-I: Demand Based	0.55	0.58	0.61	0.64	0.67
ii	LTPS-II: Connected Load Based	0.83	0.85	0.88	0.91	0.93
iii	LTPS-III: Connected Load Based	0.36	0.38	0.40	0.42	0.44

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S. No.	Categories	2025-26 (Projected)	2026-27 (Projected)	2027-28 (Projected)	2028-29 (Projected)	2029-30 (Projected)
6	Electric Vehicle Charging Stations					
i	LTEV-I: Demand Based					
7	HIGH TENSION SUPPLY					
i	HTS-I: Demand Based	0	0	0	0	0
ii_	HTS-II: Demand Based	2.34	2.55	2.79	3.05	3.34
8	Total	60.19	62.15	64.21	66.37	68.66

## 4.1.3 Number of Consumers

In the Business plan for the control period FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY2029-30, LED has proposed the category wise number of consumers. LED has considered the same in the instant petition for determining ARR for the control period. The category wise number of consumers for the control period FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY2029-30 based on the previous tariff structure is provided below:

Table 4.3: No. of Consumers – FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY2029-30

S. No.	Categories	2025-26 (Projected)	2026-27 (Projected)	2027-28 (Projected)	2028-29 (Projected)	2029-30 (Projected)
1	Domestic	21,574	21,859	22,147	22,439	22,735
2	Commercial	5,300	5,671	6,069	6,494	6,949
3	Govt. Connection	1,119	1,142	1,165	1,188	1,212
4	Industrial	374	378	383	388	392
5	HT Consumers	9	10	10	11	11
6	Public Lighting	69	69	69	69	69
7	Agriculture	25	40	60	85	120
8	Others Temporary					
	Supply	270	270	270	270	270
9	Total	28741	29439	30173	30943	31758

The category wise number of consumers for the control period FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY2029-30 based on the new Retail Supply Tariff Structure is provided below:

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Table 4.4: No. of Consumers Sales in the new Retail Supply Tariff Structure

S. No.	Categories	2025-26 (Projected)	2026-27 (Projected)	2027-28 (Projected)	2028-29 (Projected)	2029-30 (Projected)
1	DOMESTIC SERVICE (DS)					
i	LTDS-I: Connected Load Based	0	0	0	0	0
ii	LTDS-II: Demand Based	20,864	21,142	21,424	21,710	21,999
iii	LTDS-III: Demand Based	1,098	1,113	1,128	1,143	1,158
_ 2	NON-DOMESTIC SERVICE (NDS)					
i	NDS – I: Demand Based	5,843	6,211	6,603	7,023	7,471
ii	NDS - II: Demand Based	188	201	215	230	246
iii	NDS - III: Demand Based	0	0	0	0	0
iv	NDS - IV: Demand Based	183	187	191	194	198
V	NDS - V: Connected Load Based	72	73	74	75	76
3	AGRICULTURAL SERVICE (AS)					
i	LTAS - I: Connected Load Based	25	40	60	85	120
ii	LTAS - II: Demand Based	0	0	0	0	0
iii	LTAS - III: Demand Based	0	0	0	0	0
4	INDUSTRIAL SERVICES (LTIS)	374	378	383	388	392
_5	PUBLIC UTILITY SERVICES					
i	LTPS-I: Demand Based	14	14	14	14	15
ii	LTPS-II: Connected Load Based	69	69	69	69	69
iii	LTPS-III: Connected Load Based	2	2	2	2	2
6	Electric Vehicle Charging Stations					
i	LTEV-I: Demand Based	0	0	0	0	0
7	HIGH TENSION SUPPLY					
j	HTS-I: Demand Based	0	0	0	0	0
ii	HTS-II: Demand Based	9	10	10	11	11
8	Total	28,741	29,439	30,173	30,943	31,758

## 4.1.4 Connected Load

In the Business plan for the control period FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY2029-30, LED has proposed the category wise connected load. LED has considered the same in the instant petition for determining ARR for the control period.

The category wise connected load for the control period FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY2029-30 previous tariff structure is provided below:



Table 4.5: Connected Load – FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY2029-30

(In kVA)

S. No.	Categories	2025-26 (Projected)	2026-27 (Projected)	2027-28 (Projected)	2028-29 (Projected)	2029-30 (Projected)	
1	Domestic	96521	101116	105929	110972	116255	
2	Commercial	12307	12691	13088	13496	13918	
3	Govt. Connection	13565	13896	14234	14581	14937	
4	Industrial	4627	5045	5502	5999	6542	
5	HT Consumers	1481	1628	1790	1967	2163	
6	Public Lighting	294	296	298	300	302	
7	Agriculture	63	100	150	213	300	
8	Others Temporary Supply	346	346	346	346	346	
9	Total	129204	135119	141337	147875	154762	

The category wise connected load for the control period FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY2029-30 new Retail Supply Tariff Structure is provided below:

Table 4.6: Connected Load Sales in the new Retail Supply Tariff Structure

(In kVA)

S. No.	Categories	2025-26 (Projected)	2026-27 (Projected)	2027-28 (Projected)	2028-29 (Projected)	2029-30 (Projected)
1	DOMESTIC SERVICE (DS)					
i	LTDS-I: Connected Load Based	0	0	0	0	0
ii	LTDS-II: Demand Based	96,660	1,01,144	1,05,838	1,10,753	1,15,899
iii	LTDS-III: Demand Based	5,087	5,323	5,570	5,829	6,100
2	NON-DOMESTIC SERVICE (NDS)					
i	NDS - I: Demand Based	17,460	17,958	18,471	18,998	19,541
ii	NDS - II: Demand Based	522	538	555	572	590
iii	NDS - III: Demand Based	0	0	0	0	0
iv	NDS - IV: Demand Based	2,560	2,623	2,687	2,752	2,819
٧	NDS - V: Connected Load Based	103	108	113	119	124
3	AGRICULTURAL SERVICE (AS)					
i	LTAS – I: Connected Load Based	63	100	150	213	300
ij	LTAS - II: Demand Based	0	0	0	0	0
iii	LTAS - III: Demand Based	0	0	0	0	0
4	INDUSTRIAL SERVICES (LTIS)	4,627	5,045	5,502	5,999	6,542
5	PUBLIC UTILITY SERVICES					
i	LTPS-I: Demand Based	220	225	230	236	242
ii	LTPS-II: Connected Load Based	294	296	298	300	302
iii	LTPS-III: Connected Load Based	127	130	133	136	140

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S. No.	Categories	2025-26 (Projected)	2026-27 (Projected)	2027-28 (Projected)	2028-29 (Projected)	2029-30 (Projected)
6	Electric Vehicle Charging Stations					
i	LTEV-I: Demand Based	0	0	0	0	0
7	HIGH TENSION SUPPLY					
i	HTS-I: Demand Based	0	0	0	0	0
ii	HTS-II: Demand Based	1,481	1,628	1,790	1,967	2,163
8	Total	1,29,204	1,35,119	1,41,337	1,47,875	1,54,762

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### 4.1.5 Transmission & Distribution Losses

In the Business plan for the control period FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY2029-30. LED has proposed the T&D loss trajectory. LED has considered the same T&D loss trajectory in the instant petition for determining ARR for the control period. The T&D loss trajectory for the control period FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY2029-30 is provided below:

Table 4.7: T & D Loss

Sl. No.	Particulars	FY 2025-26	FY 2026-27	FY 2027-28	FY 2028-29	FY 2029-30
1	T&D Loss Trajectory	9.25%	9.25%	9.25%	9.25%	9.25%

# 4.1.6 Energy Requirement & Sources of Power Purchase

The energy requirement for LED is projected based on the retail sales, grossed up by loss levels as per Business Plan. The energy balance expected for the FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY2029-30 is as given below:

Table 4.8: Energy Requirement – FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30

(In MU's)

					-	(111 1110 5)
Sl.		FY	FY	FY	$\mathbf{FY}$	$\mathbf{FY}$
	Particular	2025-	2026-	2027-	2028-	2029-
No.		26	27	28	29	30
	ENERGY REQUIREMENT					
Α	(MU)					
i)	Total Sales within UT	60.19	62.15	64.21	66.37	68.66
ii)	Transmission & Distribution Losses (%)	9.25	9.25	9.25	9.25	9.25
iii)	T&D Losses (MU)	6.13	6.33	6.54	6.77	7.00
	Total Energy Requirement (for	(( 22	69.49	70.75	72 14	75.00
	sale to retail consumers)	66.32	68.48	70.75	73.14	75.66
	ENERGY AVAILABILITY					
В	AT PERIPHERY					
i)	Solar Power Purchase	6.23	12.70	38.67	72.78	75.66
ii)	Solar Renewable Generation	0.00	0.00	0.00	0.00	0.00
iii)	HSD Generation (Net)	60.09	55.78	32.08	0.35	0.00
	Total Energy Availability	66.32	68.48	70.75	73.14	75.66
	ENERGY SURPLUS/(GAP)	0.00	0.00	0.00	0.00	0.00

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The energy requirement of LED is currently met majorly from own generation. However, the Department has entered into Memorandum of Understanding. The MOU deals with the utilization of the land and lagoon area in the Union Territory of Lakshadweep for setting up of cumulative capacity of 25.14 MW Solar Power Projects comprising of re-powering of the existing Ground Mounted Solar PV System, Lagoon based floating Solar PV Projects as well as and Rooftop Solar PV Installation with upto 75.71 MWh Battery Energy Storage System (hereinafter referred to as 'BESS'. Apart from the above sources, there is no availability of power from Central Generating Stations or from other sources/ open market/ power exchanges etc. Details of the available sources of power for FY 2025-26, FY 2026-27, FY 2027-28, FY 2028-29 and FY 2029-30 is provided below.

Table 4.9: Details of Power Generation – FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30

(In MU's)

S. No.	Name of Project	FY 2025-26	FY 2026-27	FY 2027-28	FY 2028-29	FY 2029-30
1	Unit Generated - HSD	60.52	56.18	32.31	0.36	0.00
2	Auxiliary Consumption	0.43	0.40	0.23	0.00	0.00
3	Net Generation (Sent out)	60.09	55.78	32.08	0.35	0.00

The estimated cost for power generation has been discussed in subsequent sections.

## 4.2 Capital Expenditure & Capitalisation

LED has undertaken capital expenditure during FY 2023-24 and the current FY 2024-25 and has plans to implement schemes for development of infrastructure during FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30. The investment plan for the control period as per the Business Plan is provided below:

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Table 4.10: Details of schemes for FY 2025-26, FY2026-27, FY2027-28, FY2028-29 & FY 2029-30

			Propose	ed Expe	nditure	
Sr.	New Schemes	0.00	(F	Rs Cror	e)	r s Arig
No.		2025- 26	2026- 27	2027- 28	2028-	2029- 30
1	Supply installation testing and commissioning of DG sets for augmentation/replacement of existing DG generating capacity at Islands	10.00	9.00	8.00	8.00	6.00
2	Replacement of old and obsolete Panel board and other allied equipment's in the Power House.	2.00	1.00	1.20	0.00	0.00
3	Improvement and augmentation of StepUp Transformer at 11 KV Stations at Lakshadweep Islands	0.70	0.80	0.75	0.75	0.50
4	Improvement and augmentation of Step DownTransformer in the Sub Stations including 11 KV Switch Gear Pannels (RMU)	1.35	1.35	1.80	1.00	0.50
5	Supply of 11 KV HT Cable line in the phased manner in all the island, 6km in each year.	0.70	0.70	0.60	0.35	0.35
6	Supply of LT Cable line in the phased manner in all the island, 20 km in each year.	0.65	0.65	0.65	0.25	0.25
7	Supply and Laying of new cable line and also replacement of old and defective cables in all the Island (Consumer Service Cables).	0.35	0.35	0.35	0.35	0.35
8	Requirement of RCC slab for cable laying work for all the Island.	0.25	0.25	0.25	0.25	0.25
9	Supply of Street light Pole and street light sets.	0.75	0.80	0.80	0.70	0.50
10	Installation and replacement of Distribution boxes.	0.60	0.65	0.70	0.50	0.40
11	Supply of Electronics Energy Meters (3 Phase/Single Phase)	0.20	0.25	0.30	0.25	0.20
12	Improvement and Augmentation of Power House/Line Tools in all the Island.	0.15	0.20	0.25	0.20	0.15
	Total	17.70	16.00	15.65	12.60	9.45

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Table 4.11: Summary of Proposed Capital Expenditure & Capitalisation for FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30

(Rs. In Crores)

Sr. No.	Particulars	FY 2025-26	FY 2026-27	FY 2027-28	FY 2028-29	FY 2029-30
1	Opening Balance	0.00	0.00	0.00	0.00	0.00
2	Add: New Investments	17.70	16.00	15.65	12.60	9.45
3	Total	17.70	16.00	15.65	12.60	9.45
4	Less; Investment Capitalised	17.70	16.00	15.65	12.60	9.45
5	Closing Balance	0.00	0.00	0.00	0.00	0.00

## 4.3 Aggregate Revenue Requirement for LED

Based on the provisions of the Tariff Regulations, the estimate for the ARR would consist of the following elements:

- o Power Generation
- o Operation and Maintenance Expenses
- Depreciation
- o Interest charges (including interest on working capital)
- o Provision for Bad and Doubtful Debts
- o Return on Equity
- Non-Tariff Income

#### 4.3.1 Power Purchase/Generation

The energy requirement of LED is current met majorly from own generation. However, the Department has entered into Memorandum of Understanding. The MOU deals with the utilization of the land and lagoon area in the Union Territory of Lakshadweep for setting up of cumulative capacity of 25.14 MW Solar Power Projects comprising of re-powering of the existing Ground Mounted Solar PV System, Lagoon based floating Solar PV Projects as well as and Rooftop Solar PV Installation with upto 75.71 MWh Battery Energy Storage System (hereinafter referred to as 'BESS'. Apart from the above sources, there is no availability of power from Central Generating Stations or from other sources/ open market/ power exchanges etc. Details of the available sources of power for FY 2025-26, FY 2026-27, FY 2027-28, FY 2028-29 and FY 2029-30 is provided below.

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The existing installed capacity of DG sets is provided below:

Table 4.12: Existing Installed Capacity of DG Sets

S. No.	Island	Machine No.	Engine Make	Alternator Make	Date of installation	Capacity (kW)
T	Minicoy	DG-1	MTU	Leroy Somer	05-08-2009	1000
2	Williacoy	DG-2	MTU	Leroy Somer	15-09-2020	1000
3		DG-6	Perkins	Leroy Somer	03-12-2019	808
4		DG-3	Greaves	KIRLOSKAR	22-04-1995	400
7		DG - 2	MTU	Leroy Somer	13-10-2010	1320
8	Kavaratti	DG - 3	CUMMINS	SAMFORD	27-01-2020	1200
9	Kavaratti	DG - 4	CUMMINS	STAMFORD	19-10-2009	600
10		DG - 5	CUMMINS	STAMFORD	18-09-2009	600
11		DG - 1	MTU	Leroy Somer	31.08.2008	1025
12	Amini	DG - 2	MTU	Leroy Somer	04.04.2010	1025
13	AIIIIII	DG - 4	CUMMINS	STAMFORD	01.09.2013	808
14		DG - 5	Perkins	Leroy Somer	07.01.2020	808
15		DG - 1	MTU	Leroy Somer	09.02.2009	1320
16		DG - 4	CUMMINS	Stamford	30.01.2013	808
18	Androth	DG - 10	VOLVO PENTA	Stamford	01.08.2016	520
19	Androin	DG - 9 VOLVO PENTA Stamford		Stamford	01.08.2016	520
20		DG - 11	Perkins	Leroy Somer	18.02.2020	600
21		DG - 12	Perkins	Leroy Somer	18.02.2020	600
22		DG - 3	Greaves	NGEF	01-01-1998	250
23		DG - 4	VOLVO PENTA	LEROY SOMER	25-05-2009	250
24	Kalpeni	DG - 5	VOLVO PENTA	LEROY SOMER	25-05-2009	250
25		DG - 6	CUMMINS	Stamford	17-02-2016	808
26		DG - 7	Perkins	LEROY-SOMER	29-01-2020	808
27		DG - 1	MTU	Leroy Somer	12-03-2008	500
28		DG - 2	MTU	Leroy Somer	02-06-2008	500
29	Agatti	DG - 3	CUMMINS	Leroy Somer	09-03-1998	400
30		DG - 5	CUMMINS	Stamford	10-01-2013	808
31		DG - 7	Perkins	Leroy Somer	23/12/2020	600
32		DG - 6	CUMMINS	Kirlosker	08-05-2011	400
33	Kadmath	DG - 7	CUMMINS	Stamford	03-02-2013	750
34		DG - 11	Perkins	LEROY SOMER	17-03-2020	600

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S. No.	Island	Machine No.	Engine Make	Alternator Make	Date of installation	Capacity (kW)
35		DG - 12	Perkins	LEROY-SOMER	08-05-2021	808
36		DG - 1	MTU	Leroy Somer	13/08/2008	505
37	Kiltan	DG - 2	MTU	Leroy Somer	14/08/2008	505
38	Killan	DG - 4	CUMMINS	STAMFORD	22/02/2016	480
39		DG - 5	Greaves	Leroy Somer	03-09-1998	400
40		DG-I	VOLVO PENTA	LEROY SOMER	10.02.2012	256
41	Chetlath	DG-II	VOLVO PENTA	LEROY SOMER	11.02.2012	256
42		DG-III	CUMMINS	STAMFORD	12.02.2013	500
43		DG - 5	Mahindra	Crompton Greaves	08-08-2021	100
44	Bitra	DG - 6	Mahindra	Crompton Greaves	09-08-2021	100
45		DG-4	CUMMINS	Stamford	28.02.2013	100
46		DG-3	CUMMINS	Kirlosker	20-12-2009	66
47		DG-4	Ashok Leyland		13-10-2021	100
48	Bangaram	Bangaram DG-5			13-10-2021	100
49		DG-6	Ashok Leyland		13-10-2021	100
			TOTAL	3016		26262

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The details of solar power procurement from SECI are provided below.

1. The SECI and the Lakshadweep Electricity Department, SECI had undertaken the feasibility report with regard to the Renewable Energy Development in Lakshadweep.

2. On 07.10.2018, the Lakshadweep Electricity Department and SECI entered into a

Memorandum of Understanding. The MOU deals with the utilization of the land and

lagoon area in the Union Territory of Lakshadweep for setting up of cumulative capacity

of 25.14 MW Solar Power Projects comprising of re-powering of the existing Ground

Mounted Solar PV System, Lagoon based floating Solar PV Projects as well as and

Rooftop Solar PV Installation with upto 75.71 MWh Battery Energy Storage System

(hereinafter referred to as 'BESS'

3. In pursuance of the above MOU, SECI executed a Power Purchase Agreement

(hereinafter referred to as 'PPA') dated 09.01.2019 where under it has been agreed

between the parties that SECI would establish the Solar Power Projects of 25.14 MW

cumulative contracted capacity with BESS Capacity up to 75.71 MWh and sale of such

energy generated from the projects would entirely be to the Lakshadweep Electricity

Department.

4. The capacity, as mentioned hereinabove, is to be established with Solar Power Projects

inclusive of empowering the existing Ground Mounted Solar PV System, Roof Top Solar

PV System as well as by setting up lagoon based floating Solar PV System presently

identified to be located in 11 islands of the Union Territory of Lakshadweep. The project

details are as under:

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Table 4.13: Proposed Installed Capacity of Solar

Islands	Solar (MW)	Ground PV Based (MW)	Roof-Top PV (MW)	Floating PV (MW)	Storage (MWh)
Agatti	3.00	0.31	0.30	2.39	9.00
Amini	2.75	0.25	0.25	2.25	8.55
Andrott	3.70	0.50	1.50	1.70	11.00
Bangaram	0.08	0.08	0.00	0.00	0.25
Bitra	0.13	0.09	0.04	0.00	0.41
Chetlat	0.75	0.15	0.20	0.40	2.10
Kadmat	2.00	0.55	0.13	1.32	6.40
Kalpeni	1.80	0.25	0.17	1.38	5.60
Kavaratti	5.80	1.40	1.90	2.50	17.00
Kiltan	1.43	0.35	0.25	0.83	4.40
Minicoy	3.70	0.40	1.50	1.80	11.00
Total	25.14	4.33	6.24	14.57	75.71

- In this regard, the PPA dated 09.01.2019 sets out the scheme of purchase and sale of solar power from the solar power projects of SECI to Lakshadweep Electricity Department as under:
  - A. Whereas an MOU has been executed between SECI and Lakshadweep Electricity Department on 07.10.2018, for setting up of cumulative 25.14 MW Solar Power Project (which includes repowering of existing ground mounted solar PV systems, Lagoon based floating solar PV system and rooftop solar PV system) with upto 75.71 MWh battery storage in 11 islands of UT Lakshadweep as per the details attached at Schedule-II.
  - B. Whereas, SECI shall Build, Own & Operate the Project(s) and will also make all required investments for the Projects.
  - C. Whereas, the proposed Project being setup at 11 islands of UT Lakshadweep and will be connected to designated LED grid at 11 kV voltage level or any other voltage level as consented by the LED.
  - D. Whereas, SECI shall also complete all other assignments required for setting up, commissioning and successful operation of the Project, considering point of sale of power at the delivery point at the outgoing feeder from the project.

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- E. Whereas, SECI shall operate and maintain the Project(s) for the period of minimum (25) years (or extended period as mutually agreed) from the date of Commercial Operation date (COD) of the project(s).
- F. Whereas, SECI has agreed to sell entire energy generated from project to LED and the LED has agreed to purchase such Power from the Projects as per terms and conditions contained herein and at a tariff to be determined as per provisions contained herein.
- G. Whereas, LED has agreed to pay for the energy purchased from SECI at a tariff to be determined as per provisions contained herein;
- H. Whereas, the tariff for sale of power will be determined as per JERC tariff determination model specified for Solar PV projects including technical constrains (like auxiliary consumption, grid availability etc). For determination of tariff, the EPC cost arrived through bidding along with other charges like IDC, Project Development Charges, incidental expenses during construction, Insurance and Contingency etc. will be considered in arriving at the final project cost.
- I. Whereas based on the final Project Cost, tariff will be computed taking into consideration other factors like guaranteed generation as per bid documents, financing Cost as per actual in line with terms of Lending Institutions, Returns on equity, O&M charges and Depreciation as per JERC/CERC parameters.
- J. Whereas any implication of Change in Law as per Clause 8 which shall result in a revision of the tariff accordingly, applicable from the month subsequent to such change.
- K. Whereas, the agreed contracted (cumulative) Capacity by SECI to LED for Solar Projects with battery storage shall be 25.14 [with BESS capacity of upto 75.71 MWh.
- 6. In terms of the MOU and PPA, SECI has proceeded with the process for selection of Engineering, Procurement and Construction Contractor (EPC) Contractor through etendering followed by e-reverse auction process for development of the projects. Considering the location of the power projects proposed, being away from the mainland and endeavor being made for the first time in Lakshadweep, the establishment of the Power Projects is necessarily to be in a phased manner and it is not possible to proceed with the selection of the developer for the cumulative capacity of 25.14 MW in one go.

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7. As at present, out of the cumulative capacity of 25.14 MW agreed to in between the parties, SECI has proceeded with the development of 1.7 MW ground mounted solar PV Power Project with 1.4 MWh BESS at the following two (2) locations:

Table 4.14: Capacity of Solar

S. No.	Island	Solar capacity (KW)	BESS Capacity (kWh)	
1.	Agatii	300	0	
2.	Kavaratti	1400	1400	
	TOTAL	1700	1400	

The power from the above planned sources have been considered to project the power availability during the control period FY 2025-26 to FY 2029-30.

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The expected power generation/procurement sources for FY 2025-26, FY 2026-27, FY 2027-28, FY 2028-29 and FY 2029-30 are provided in the table below.

Table 4.15: Details of Power Procurement Sources – FY 2025-26, FY 2026-27, FY 2027-28, FY 2028-29 and FY 2029-30

Energy Balance	FY 23- 24 (Actual) MU's	FY 24-25 (Estimated) MU's	FY 25-26 (Projected) MU's	FY 26-27 (Projected) MU's	FY 27-28 (Projected) MU's	FY 28-29 (Projected) MU's	FY 29-30 (Projected) MU's
Power							
Purchase							
(Solar -							
SECI)	1.30	3.46	4.21	8.11	31.38	61.03	63.91
Power							
Purchase							
(Solar-							
RTS)	0.00	0.00	2.03	4.59	7.29	11.75	11.75
Own							
Generation							
(DG-NET)	63.24	60.77	60.09	55.78	32.08	0.35	0.00
Total	64.53	64.22	66.32	68.48	70.75	73.14	75.66

#### 4.3.2 PROCUREMENT PLAN

The Generation forecast is based on the plant availability and energy demand for the period. Accordingly, generation for FY 2021-22, FY 2025-26, FY 2026-27, FY 2027-28, FY 2028-29 and FY 2029-30 is estimated.

Table 4.16: Projected Power Generation—FY 2025-26, FY 2026-27, FY 2027-28, FY 2028-29 and FY 2029-30

		(M	Un Us)	its Gener	ated & S	ent Out	
	FY	FY	FY	FY	FY	FY	FY
Particulars	2023- 24	2024-25		2026- 27	2027- 28	2028- 29	2029- 30
Marine Salar	Actual	Estimated		Shill have	Projected		
Units Generated (DG-Gross)	63.69	61.20	60.52	56.18	32.31	0.36	0.00
Auxiliary Consumption	0.45	0.43	0.43	0.40	0.23	0.00	0.00
Sent Out	63.24	60.77	60.09	55.78	32.08	0.35_	0.00

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#### 4.3.3 Cost of Fuel:

On the basis of the Generation projections as detailed above, the cost of generation has been estimated for respective years of the control period. Details of cost of fuel are provided below:

Table 4.17: Cost of Fuel for FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30

(Rs. In Crores)

S. No.	Type of Fuel	FY 2025- 26	FY 2026- 27	FY 2027- 28	FY 2028- 29	FY 2029- 30
1	Cost of HSD	205.43	200.24	120.93	1.40	0.00
	Cost of Lube					
2	Oil	1.55	1.52	0.92	0.01	0.00
3	Total	206.98	201.76	121.84	1.41	0.00

Cost of fuel for FY 2024-25 has been arrived at by taking the average price of HSD & for the FY 2023-24 and escalating the same by 5%. Similarly, cost of fuel for FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30 has been projected by escalating estimated rate of previous year by 5% year over year.

Considering the above, the Hon'ble Commission is requested to allow the cost of fuel as estimated by LED for FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30.

## 4.3.4 Cost of Power purchase:

As detailed in the previous section, LED has entered into MOU with SECI for procurement of power. The petition for determination power purchase rate is pending before Hon'ble CERC. However, for purpose of projecting power purchase cost, the provisional rate of Rs. 8.60 per unit as per the provisional bill raised by SECI. Copy of a bill is attached as Annexure – I.

On the basis of the Power procurement projections detailed above, the cost of power purchase has been estimated for respective years of the control period. Details of cost of power purchase are provided below:

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Table 4.18: Cost of power purchases for FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30

(Rs. In Crores)

S. No.	Particulars	FY 2025-26	FY 2026-27	FY 2027-28	FY 2028-29	FY 2029-30
1	Cost of Solar Power Purchase - SECI	3.62	6.98	26.99	52.49	54.96
2	Cost of Solar Power Purchase - RTS	1.37	3.10	4.92	7.93	7.93
3	Total	4.99	10.07	31.91	60.42	62.89

Cost of Solar Power Purchase from SECI for control period FY 2025-26 to FY 2029-30 has been arrived at by taking the contract price of Rs. 8.60 per unit as per the agreed provisional rate for FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30.

Further, cost of procurement of power from Roof-Top Solar has been calculated on the basis of the generic tariff for Solar PV of Rs. 6.75 per unit as approved by the Hon'ble Commission in the Generic Tariff Order for renewable sources Dt.28<sup>th</sup> April, 2021.

Considering the above, the Hon'ble Commission is requested to allow the cost of power purchase as estimated by LED for FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30.

# 4.3.5 Transmission and Other Charges

There are no separate transmission charges as the transmission and distribution system is being operated & maintained by LED and same is included in operation and maintenance cost.

### 4.3.6 Operation and Maintenance Expenses

Operation & Maintenance expenses comprise of the following heads of expenditure viz.

- Employee Expenses
- Administration & General Expenses
- Repairs & Maintenance Expenses

#### 4.3.6.1 Employee Expenses

The expense head of employee cost consists of salary, wages, pension contribution and other employee costs etc. In accordance with Regulation 72 of MYT Regulations, 2024 LED has projected the employee cost for the control period by taking the actual employee expenses for the FY 2023-24 as base and escalating the same at the rate of 5.46% year over year i.e. average increase in CPI from 2021-22 to 2023-24. Further, the growth factor (Gn) for the respective years has been considered for meeting additional manpower requirement.

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It is therefore, kindly requested that Hon'ble Commission may approve the employee expenses as projected. The parameters adopted for projecting the employee cost is given below:

Table 4.19: Employee Expenses parameter

Particular	Unit	FY 2024-25	FY 2025-26	FY 2026-27	FY 2027-28	FY 2028-29	FY 2029-30
Opening no. of employees	No.	273	264	340	345	353	356
Closing no. of employees	No.	264	340	345	353	356	352
Gn	ln %	-3%	29%	1%	2%	1%	-1%
Employee Cost of Previous Year	Rs. Cr.	23.91	24.39	33.12	35.44	38.24	40.67
Growth Factor (Gn)	In %	-3%	29%	1%	2%	1%	-1%
CPI Inflation	In %	5.46%	5.46%	5.46%	5.46%	5.46%	5.46%
Projected Employee Cost	Rs. Cr.	24.39	33.12	35.44	38.24	40.67	42.41

#### 4.3.6.2 Administration and General Expenses

A&G expenses comprise of the following broad subheads of expenditure, viz.

- Domestic Travelling Expenses
- Office Expenses
- Legal, Regulatory & Consultancy Fees
- Insurance etc.

The A&G expenses for the FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30 has been projected in accordance with Regulation 72 of MYT Regulations, 2024 by escalating the A&G expenses for the FY FY2023-24 by 5.46% i.e. average increase in CPI from 2021-22 to 2023-24, year over year. It is therefore requested that the Hon'ble Commission may kindly approve the A&G expenses as proposed. The escalation is to absorb the normal inflationary increases in the costs. The parameters adopted for projecting the A&G expenses is given below:

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Particular	Unit	FY 2024-25	FY 2025-26	FY 2026-27	FY 2027-28	FY 2028-29	FY 2029-30
A&G Expenses of	Rs.						
Previous Year	Cr.	2.26	2.39	2.52	2.65	2.80	2.95
CPI Inflation	In %	5.46%	5.46%	5.46%	5.46%	5.46%	5.46%
Projected A&G expenses	Rs. Cr.	2.39	2.52	2.65	2.80	2.95	3.11

Table 4.20: Administration & General Expenses Parameter

### 4.3.6.3 Repairs and Maintenance Expenses

LED has been undertaking various Repairs and Maintenance activities as a step towards improvement of systems, reduction in breakdowns, reduction in response time and increasing preventive maintenance. The R&M expenses for the control period FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30 has been projected in accordance with Regulation 72 of MYT Regulations, 2024 considering the following factors:

- i. 'K' factor calculated as per the Regulation 72.4 of MYT Regulations, 2024,
- ii. Average increase in WPI from 2021-22 to 20230-24 i.e 7.23% &
- iii. GFA at the beginning of the respective years.

It is requested to Hon'ble Commission to kindly approve R&M expenses as proposed below:

Table 4.21: Repairs & Maintenance Expenses parameter

Particular	Unit	FY 2024-25	FY 2025-26	FY 2026-27	FY 2027-28	FY 2028-29	FY 2029-30
Opening GFA	Rs. Cr.	200.36	212.12	229.82	245.82	261.47	274.07
Addition During the year	Rs. Cr.	11.76	17.70	16.00	15.65	12.60	9.45
Closing assets	Rs. Cr.	212.12	229.82	245.82	261.47	274.07	283.52
Average GFA	Rs. Cr.	206.24	220.97	237.82	253.64	267.77	278.79
K Factor	%	4.00%	5.56%	5.56%	5.56%	5.56%	5.56%
WPI Inflation	%	7.23%	7.23%	7.23%	7.23%	7.23%	7.23%
Projected R&M Expenses	Rs. Cr.	8.60	12.65	13.71	14.66	15.59	16.34

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## 4.3.6 O&M Expenditure

On the basis of the above parameters the estimated O&M Expenditure for FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30 is tabulated below:

Table 4.22: O&M Expenditure – FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30

Rs. In Crores.

Particular	FY 2025- 26	FY 2026- 27	FY 2027- 28	FY 2028- 29	FY 2029- 30
Employee Expenses	33.12	35.44	38.24	40.67	42.41
R&M Expenses	12.65	13.71	14.66	15.59	16.34
A&G Expenses	2.52	2.65	2.80	2.95	3.11
Total O&M Expenses	48.29	51.80	55.70	59.22	61.87

It is submitted that LED is now gearing up for meeting the operational requirement of servicing existing and additional new consumers in line with the Standards of performance which the licensees have to adhere to. Hence, there would be an increase in O&M expenditure to support full-fledged distribution business operations.

#### 4.3.7 Gross Fixed Assets

It is submitted that opening value of gross fixed assets (GFA) for 2024-25 has been taken from actual GFA for the FY 2023-24 and the same has been increased by estimated addition of assets during the FY 2024-25. Thereafter, planned additions during FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30 as per the Business Plan have been considered and accordingly, GFA has been computed for the control period. The GFA for the control period is provided in the table below.

Table 4.23: Gross Fixed Assets Movement

(Rs. In Crores)

Particulars	FY 2023-24	FY 202 <b>4-25</b>	FY 2025-26	FY 2026-27	FY 2027-28	FY 2028-29	FY 2029-30
Opening GFA	194.15	200.36	212.12	229.82	245.82	261.47	274.07
Capitalization	6.20	11.76	17.70	16.00	15.65	12.60	9.45
Closing GFA	200.36	212.12	229.82	245.82	261.47	274.07	283.52



## 4.3.8 Depreciation

The depreciation for FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30 is computed based on the average depreciation rates for the previous year and the average assets for the respective financial year. The table below provides the summary of depreciation for the control period.

Table 4.24: Depreciation – FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30

(Rs. In Crores)

Particular	FY 2025-26	FY 2026-27	FY 2027-28	FY 2028-29	FY 2029-30
Gross Opening GFA	212.12	229.82	245.82	261.47	2 <b>7</b> 4.07
Less: Assets depreciated upto 90% till FY 2020-21	24.34	24.34	24.34	24.34	24.34
Net Opening GFA	187.77	205.47	221.47	237.12	249.72
Addition	17.70	16.00	15.65	12.60	9.45
Closing GFA	205.47	221.47	237.12	249.72	259.17
Average GFA	196.62	213.47	229.30	243.42	254.45
Depreciation Rate	4.53%	4.53%	4.53%	4.53%	4.53%
Depreciation	8.91	9.67	10.39	11.03	11.53

## 4.3.9 Interest and Financial Charges

The Interest costs have been estimated under following three heads:

- Interest on Debt/ Long term loans
- Interest on Working Capital
- Interest on Security Deposit

#### 4.3.9.1 Interest on Loan/Debt

The LED being a Government Department, the entire capital employed till date has been funded through equity infusion by the Central Government through budgetary support without any external borrowings. The interest on debt/loan has been calculated considering debt to be 70% of GFA. Repayment of loan has been considered equivalent to the depreciation of the respective years.

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It is submitted that Regulation 29.4 of MYT Regulations, 2024 provides as below:

"......Provided also that if the Generating Company or the Transmission Licensee or the Distribution Licensee does not have actual loan, then one (1) Year State Bank of India (SBI) MCLR / any replacement thereof as notified by RBI for the time being in effect applicable for one (1) Year period, as may be applicable as on 1st April of the relevant Year shall be considered as the rate of interest for the purpose of allowing the interest on the normative loan....".

In view of the above Regulation, Interest on loan for the control period FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30 has been calculated on the average normative loan for the respective year @ SBI MCLR for 1 year tenor as on 1st April, 2024 as provided in Regulation 29.4 of MYT Regulations, 2024. The SBI MCLR for 1 year tenor as on 1st April, 2024 was 8.65%, hence rate of interest considered for calculating interest on loan is 8.65%. The interest calculation for the control period are detailed in the table below:

Table 4.25: Interest on Loan

(Rs. In Crore)

Particular	FY 2025-26	FY 2026-27	FY 2027-28	FY 2028-29	FY 2029-30
Opening Normative loan	0.00	3.48	5.01	5.58	3.37
Add: Normative Loan during the year (70% of proposed capitalization)	12.39	11.20	10.96	8.82	6.62
Less: Normative Repayment equal to Depreciation	8.91	9.67	10.39	11.03	9.99
Closing Normative Loan	3.48	5.01	5.58	3.37	0.00
Average Normative Loan	1.74	4.25	5.30	4.47	1.69
Interest Rate (@ SBI MCLR for 1 year tenor as on 1st April, 2024)	8.65%	8.65%	8.65%	8.65%	8.65%
Interest on Loan	0.15	0.37	0.46	0.39	0.15

# 4.3.9.2 Interest on Working Capital

The LED has computed the Interest on Working Capital for FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30 on normative basis. The normative working capital has been calculated in accordance with Regulations 78.1 of MYT Regulations, 2024 as follows:

O&M Expenses for one (1) month; plus

Maintenance spares at 40% of repair and maintenance expenses for one (1)

month; plus

Receivables equivalent to two (2) months of the expected revenue from c) Consumers at the prevailing tariff

#### Less

Power Purchase cost for one (1) month; Provided that the Power Purchase cost including cost of REC paid in advance; if any shall be excluded;

### plus

Amount, if any, held as security deposits under clause (b) of subsection (1) of Section 47 of the Act from Consumers except the security deposits held in the form of Bank Guarantees:

It is submitted that Regulation 32.5 of MYT Regulations, 2024 provides as below:

"The rate of interest on working capital shall be equal to one (1) Year State Bank of India (SBI) MCLR / any replacement thereof as notified by RBI for the time being in effect applicable for one (1) Year period, as may be applicable as on 1st April of the relevant Financial Year plus 325 basis points".

In view of the above Regulation, Interest on working capital for the control period FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30 has been calculated on the working capital for the respective year @ SBI MCLR for 1 year tenor as on 1st April, 2024 plus 325 basis points as provided in Regulation 32.5 of MYT Regulations, 2024. The SBI MCLR for 1 year tenor as on 1<sup>st</sup> April,2024 was 8.65%, hence rate of interest considered for calculating interest on loan is 11.90% ( 8.65% + 3.25%).

The interest on normative working capital for FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30 calculated on the basis of the above parameters is given in the table below:

**Table 4.26: Interest on Working Capital** 

(Rs. In Crore)

Particular	FY 2025- 26	FY 2026-27	FY 2027-28	FY 2028-29	FY 2029-30
O&M expenses - 1 month	4.02	4.32	4.64	4.93	5.16
Maintenance Spares @ 40% of R&M expense - 1 month	0.42	0.46	0.49	0.52	0.54
Two Months Receivables	7.90	8.24	8.58	8.95	9.34
Less: Power Purchase Cost for One (1) Month	0.42	0.84	2.66	5.03	5.24
Less: Amount held as Security Deposits	8.06	8.79	9.53	10.26	11.00
Total Working Capital	3.88	3.38	1.53	0.00	0.00
Rate of Interest on Working Capital	11.90%	11.90%	11.90%	11.90%	11.90%
Interest on Working Capital	0.46	0.40	0.18	0.00	0.00

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The Hon'ble Commission is requested to kindly approve the interest on working capital as proposed.

#### 4.3.9.3 Interest on Security Deposit

Interest on Security Deposits has been calculated on the projected average balance of Security Deposit from the consumers during the respective financial year.

The rate of interest on security deposit has been calculated at the bank rate as on 1<sup>st</sup>April, 2024 in accordance with Regulation 29.11 of MYT Regulations, 2024. The bank rate as on 1<sup>st</sup> April, 2024 was 6.75%.

The interest on security deposit for FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30 calculated on the basis of the above parameters is given in the table below:

Table 4.27: Interest on Security Deposit

(Rs. In Crore)

Particular	FY 2025- 26	FY 2026- 27	FY 2027- 28	FY 2028- 29	FY 2029- 30
Opening Security Deposit	7.32	8.06	8.79	9.53	10.26
Net Addition during the year	0.74	0.74	0.74	0.74	0.74
Refund during the year	0.00	0.00	0.00	0.00	0.00
Closing Security Deposit	8.06	8.79	9.53	10.26	11.00
Average Security Deposit	7.69	8.42	9.16	9.89	10.63
RBI Bank Rate	6.75%	6.75%	6.75%	6.75%	6.75%
Interest on Consumer Security Deposit	0.52	0.57	0.62	0.67	0.72

## 4.3.10 Provision for Bad and Doubtful Debts

LED has not projected provision for bad debts for the control period. It is submitted that claim towards bad debts shall be made at the time of true-up based on the audited accounts of the respective years.

#### 4.3.11 Return on Equity

In accordance with the Regulations, Debt: Equity norm of 70:30 and RoE of 16% for FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30 has been considered and accordingly, the return on equity is calculated as given below:

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Table 4.28: Return on Equity – FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30

(Rs. In Crore)

Particular	FY 2025- 26	FY 2026-27	FY 2027-28	FY 2028-29	FY 2029-30
Opening Equity Amount	63.35	68.66	73.46	78.16	81.94
Equity Addition during year (30% of Capitalization)	5.31	4.80	4.70	3.78	2.84
Closing Equity Amount	68.66	73.46	78.16	81.94	84.77
Average Equity Amount	66.01	71.06	75.81	80.05	83.36
Rate of Return on Equity	16.00%	16.00%	16.00%	16.00%	16.00%
Return on Equity	10.56	11.37	12.13	12.81	13.34

### 4.3.12 Non-Tariff Income

Non-tariff income for the FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30 has been projected by escalating the estimated Non-tariff income of FY 2024-25 by 5% YOY. Accordingly, Non-tariff income for the FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30 is given in the table below:

Table 4.29: Non-Tariff Income

(Rs. In Crore)

					(2201 222 01010)
Particular	FY 2025- 26	FY 2026- 27	FY 2027- 28	FY 2028- 29	FY 2029- 30
Non-Tariff Income	0.61	0.64	0.67	0.70	0.74

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# 4.3.13 Aggregate Revenue Requirement

Based on the above estimates and projections, the ARR for LED for FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30 works out as under:

Table 4.30: Annual Revenue Requirement

(Rs. In Crores)

S.	TUSE INVESTIGATION AS	FY	FY	FY	FY	FY
No.	Particular	2025-26	2026-27	2027-28	2028-29	2029-30
1	Power Purchase Cost	4.99	10.07	31.91	60.42	62.89
2	Fuel Cost	206.98	201.76	121.84	1.41	0.00
3	O&M Expenses	48.29	51.80	55.70	59.22	61.87
4	Depreciation	8.91	9.67	10.39	11.03	11.53
5	Interest and Finance charges	0.15	0.37	0.46	0.39	0.15
6	Interest on working capital	0.46	0.40	0.18	0.00	0.00
7	Return on Equity	10.56	11.37	12.13	12.81	13.34
8	Interest on Security Deposit	0.52	0.57	0.62	0.67	0.72
9	Income Tax	0.00	0.00	0.00	0.00	0.00
10	Net Revenue Requirement	280.86	286.01	233.23	145.94	150.49
11	Less: Non-Tariff Income	0.61	0.64	0.67	0.70	0.74
12	Net Revenue Requirement (10-11)	280.25	285.38	232.56	145.24	149.75

## 4.4 Average Cost to Supply

Based on the above computed ARR, the Average Cost of Supply for the control period is calculated in the table below.

Table 4.31 : Average Cost of Supply for FY 2015-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30

Sr. No.	Particulars	FY 2025- 26	FY 2026-27	FY 2027-28	FY 2028-29	FY 2029-30
1	2	3	4	5	6	7
	Net Revenue Requirement					
1	(Rs. In Crore)	280.25	285.38	232.56	145.24	149.75
2	Energy Sales (MU's)	60.19	62.15	64.21	66.37	68.66
	Average cost of					
3	supply/unit (In Rs)	46.56	45.92	36.22	21.88	21.81

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## 4.5 Revenue at Existing Tariff and Gap for the control period

The estimated revenue at Existing Tariff for FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30 and gap is provided in the table below.

Table 4.32 : Revenue Gap at Existing Tariff FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30

(Rs. In Crores)

S. No.	Particulars	FY 2025-26	FY 2026-27	FY 2027-28	FY 2028-29	FY 2029-30
1	Net Revenue Requirement	280.25	285.38	232.56	145.24	149.75
2	Revenue from retail sales at Existing Tariff	44.50	46.34	48.28	50.32	52.48
3	Revenue Surplus/(Gap) for the Year	(235.75)	(239.04)	(184.28)	(94.92)	(97.27)

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## 5 TARIFF PROPOSAL FOR FY 2025-26 to FY 2029-30

LED in the previous sections has discussed the estimated performance for the FY 2025-26, FY2026-27, FY2027-28, FY2028-29 and FY 2029-30 based on the past years performances and certain assumptions explained at appropriate places to determine the Aggregate Revenue Required for the control period

## 5.1 Recovery of Revenue Gap for FY 2025-26 to FY 2029-30

The estimated gap at existing tariff for the each year of the control period has been computed by deducting the net ARR from Revenue at Existing Tariff of the respective years. LED has projected gap at existing tariff for each year of the control period as detailed in the table above.

Tariff is a sensitive subject having substantial impact on social, economic and financial well being of the public at large as well as the viability and growth of power sector. LED proposes to recover a part of the gap through hike in tariff as recovery of the total gap would result in huge burden on the consumers. The proposed tariff for recovery of the gap is detailed in the subsequent section.

#### 5.2 Proposed Tariff for FY 2025-26 to FY 2029-30

#### 5.2.1 Tariff Proposal for FY 2025-26 to FY 2029-30

The basic requirement of any Tariff proposal is that it has to be transparent and justifiable against various policy guidelines and the framework evolved by the JERC and various SERCs. In the light of the experience gained by other utilities in implementation of the tariff orders and regulatory requirements specified under various states and policy guidelines an attempt has been made to improve upon the present tariff design. The cost of supply, average revenue per unit at existing tariff & gap per unit is provided in the tables below for each year of the control period FY 2025-26 to FY 2029-30.

It is submitted that over 95% of power is generated from Diesel based generating stations. There is no other source of energy. Major component of cost of supply is cost of HSD and Lubricants. The above factor, apart from general rise in prices have necessitated the increase in tariff. However, in this Tariff proposal only partial recovery of cost is proposed.

Considering the above, the tariff proposal for FY 2025-26 to FY 2029-30 for individual categories is given below along with the comparison of existing and proposed energy charges.

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Table 5.1: Energy Charges – Existing Tariff

	Existing	
Category	Energy Charge (Rs./Kwh)	Fixed Charges
Life Line Connection	1.60	Rs. 10/- per kW per month
Domestic Connection		
0 to 100 units	3.00	
101 to 200 units	4.50	Rs. 25/- per kW per
201 to 300 units	6.50	month
301 units & above	8.50	
Commercial		
0-100 Units	10.00	
101 to 200 Units	11.50	Rs. 35/- per kW per month
201 Units & above	15.00	
Govt. Connection		
0-200 Units	14.00	De 45/ months / months
201 units & above	15.30	Rs. 45/- per kW per month
Industrial		
All units	10.00	Rs. 65/- per KVA per month
HT Consumers	13.15	Rs. 200/- per KVA per month
Public Lighting	10.80	Rs. 90/- per KVA per month
EV Charging Stations	7.80	
Temporary Connection	7.66	

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Table 5.2: Energy Charge - Proposed Tariff

			F	roposed						
	FY 202	25-26	FY 202	26-27	FY 20	27-28	FY 202	28-29	FY 207	29-30
Category	Energy Charge (Rs./Kwh)	Fixed Charges	Energy Charge (Rs./Kwh)	Fixed Charges	Energy Charge (Rs./Kwh)	Fixed Charges	Energy Charge (Rs./Kwh)	Fixed Charges	Energy Charge (Rs./Kwh)	Fixed Charge
DOMESTIC SERVICE (DS)										
LTDS-I: Connected Load Based										
All units	1.75	Rs. 10/- per kW per month	1.90	Rs. 10/- per kW per month	2.05	Rs. 10/- per kW per month	2.20	Rs. 10/- per kW per month	2.35	Rs. 10/- per kW per month
LTDS-II: Demand Based										
Upto 100	3.30		3.55		3.80		4.05		4.30	
101 to 200	4.95	Rs. 25/-	5.30	Rs. 25/- per kW	5 65	Rs. 25/- per kW per month	6.00	Rs. 25/- per kW per month	6.35	Rs. 25/ per kW per month
201 to 300	7.15	per kW per	7.70		8.25		8.80		9.35	
301 to 400 Units	9.35	month	10.05	month	10.75		11.45		12.15	
Above 400	12.15		13.05		13.95		14.85		15.75	
LTDS-III: Demand Based										
Upto 100	3.35		3.60		3.85		4.10		4.35	
101 to 200	5.05	Rs. 25/-	5.45	Rs. 25/-	5.85	Rs. 25/-	6.25	Rs. 25/-	6.65	Rs. 25/-
201 to 300	7.30	per kW per	7.85	per kW per	8.40	per kW per	8.95	per kW per	9.50	per k\\ per
301 to 400 Units	9.50	month	10.20	month	10.90	month	11.60	month	12.30	month
Above 400	12.35		13.30		14.25		15.15		16.05	
Above 400	12.33	<u> </u>	13.30	<del> </del>	14.23		13.13		16.03	+

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			Parada Salara Sa	roposed						
	FY 202	5-26	FY 202	26-27	FY 202	27-28	FY 202	28-29	FY 202	29-30
Category	Energy Charge (Rs./Kwh)	Fixed Charges	Energy Charge (Rs./Kwh)	Fixed Charges	Energy Charge (Rs./Kwh)	Fixed Charges	Energy Charge (Rs./Kwh)	Fixed Charges	Energy Charge (Rs./Kwh)	Fixed Charge
NON-DOMESTIC SERVICE (NDS)										
NDS - I: Demand Based			-							
Upto 100	11.00	Rs. 35/-	11.85	Rs. 35/-	12.65	Rs. 35/-	13.50	Rs. 35/-	14.30	Rs. 35/-
101 to 200	12.65	per kW per	13.60	per kW per	14.55	per kW per	15.50	per kW per	16.45	per kW
Above 200	16.50	month	17.75	month	19.00	month	20.25	month	21.45	month
NDS - II: Demand Based										_
Upto 100	11.00	Rs. 35/- per kW	11.85	Rs. 35/- per kW	12.65	Rs. 35/- per kW	13.50	Rs. 35/- per kW	14.30	Rs. 35/
101 to 200	12.65	per kw	13.60	per	14.55	per kvv	15.50	per	16.45	per KV
Above 200	16.50	month	17.75	month	19.00	month	20.25	month	21.45	month
NDS - III: Demand Based										
All units	13.55	Rs. 35/- per kW per month	14.55	Rs. 35/- per kW per month	15.55	Rs. 35/- per kW per month	16.55	Rs. 35/- per kW per month	17.55	Rs. 35/ per kW per month
NDS – IV: Demand Based										
All units	16.60	Rs. 35/- per kW per month	17.85	Rs. 35/- per kW per month	19.10	Rs. 35/- per kW per month	20.35	Rs. 35/- per kW per month	21.55	Rs. 35, per kV per month
NDS - V: Connected Load Based				_						

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			I	Proposed						
	FY 202	5-26	FY 20	26-27	FY 202	27-28	FY 202	28-29	FY 202	29-30
Category	Energy Charge (Rs./Kwh)	Fixed Charges	Energy Charge (Rs./Kwh)	Fixed Charges	Energy Charge (Rs./Kwh)	Fixed Charges	Energy Charge (Rs./Kwh)	Fixed Charges	Energy Charge (Rs./Kwh)	Fixed Charges
All units	5.00	Rs. 35/- per kW per month	5,35	Rs. 35/- per kW per month	5.75	Rs. 35/- per kW per month	6.10	Rs. 35/- per kW per month	6.45	Rs. 35/- per kW per month
AGRICULTURAL SERVICE (AS)										
LTAS - I: Connected Load Based										
All units	3.00		3,25		3.45		3.70		3.90	
LTAS - II: Demand Based										
All units	3.00	]	3.25		3.45	]	3.70	]	3.90	
LTAS - III: Demand Based						_			_	
All units	3.00		3.25		3.45		3.70		3.90	
INDUSTRIAL SERVICES (LTIS)										1
1-500	11.00	Rs. 65/-	11.85	Rs. 65/-	12.65	Rs. 65/-	13.50	Rs. 65/-	14.30	Rs. 65/-
501-1000	12.65	per KVA	13.60	per KVA	14.55	per KVA	15.50	per KVA	16 45	per KVA
Above 1000	16.50	per month	17.75	per month	19.00	per month	20.25	per month	21.45	per month
PUBLIC UTILITY SERVICES										
LTPS-I: Demand Based			_	<del>                                     </del>						

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		B. L.	I	roposed			100			
	FY 202	5-26	FY 202	26-27	FY 20	27-28	FY 202	28-29	FY 20	29-30
Category	Energy Charge (Rs./Kwh)	Fixed Charges								
All units	16.60	Rs. 90/- per KVA per month	17.85	Rs. 90/- per KVA per month	19.10	Rs. 90/- per KVA per month	20.35	Rs. 90/- per KVA per month	21.55	Rs 90/- per KVA per month
LTPS-II: Connected Load Based										
All units	11.90	Rs. 90/- per KVA per month	12.80	Rs. 90/- per KVA per month	13.70	Rs. 90/- per KVA per month	14.60	Rs. 90/- per KVA per month	15.50	Rs. 90/- per KVA per month
LTPS-III: Connected Load Based										
All units	16.60	Rs. 90/- per KVA per month	17.85	Rs. 90/- per KVA per month	19.10	Rs. 90/- per KVA per month	20.35	Rs. 90/- per KVA per month	21.55	Rs. 90/- per KVA per month
Electric Vehicle Charging Stations										
LTEV-I: Demand Based										
All units	8 60		9.25		9.90		10.55		11.20	
HIGH TENSION SUPPLY										
HTS-I: Demand Based			-							

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			F	roposed						
	FY 202	25-26	FY 2026-27		FY 2027-28		FY 202	28-29	FY 2029-30	
Category	Energy Charge (Rs./Kwh)	Fixed Charges								
All units	14.45	Rs. 200/- per KVA per month	15.55	Rs. 200/- per KVA per month	16.65	Rs. 200/- per KVA per month	17.75	Rs. 200/- per KVA per month	18.80	Rs. 200/- per KVA per month
HTS-II: Demand Based										
All units	14.45	Rs. 200/- per KVA per month	15.55	Rs. 200/- per KVA per month	16.65	Rs. 200/- per KVA per month	17.75	Rs. 200/- per KVA per month	18.80	Rs 200/- per KVA per month

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#### 5.3 Revenue at Proposed Tariff for the FY 2025-26 to FY 2029-30

Based on the tariff proposed above, following is the summary of the revenue from various consumer categories at the proposed tariff, which is being compared with the consumer category-wise revenue at existing tariff:

Table 5.3: Comparison of Revenue at Existing Tariff with Proposed Tariff

(Rs. In Crores)

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	14-	I	Y 2025-	26	I	Y 2026-	27	I	Y 2027-	28	I	Y 2028-	29	I	Y 2029-	30
S. N o.	Categories	Ener gy Sales (MU 's)	Reve nue at Existi ng Tariff	Reven ue at Propo sed Tariff												
1	DOMESTIC SERVICE (DS)															
i	LTDS-I: Connected Load Based	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ii	LTDS-II: Demand Based	42.14	21.55	23.75	43.08	22.09	25.96	44.05	22.64	28.27	45.05	23.21	30.68	46.06	23.80	33.16
iii	LTDS-III: Demand Based	2.22	1.13	1.27	2.27	1.16	1.39	2.32	1.19	1.52	2.37	1.22	1.65	2.42	1.25	1.78
2	NON-DOMESTIC SERVICE (NDS)															
i	NDS - I: Demand Based	6.90	9.24	10.10	7.24	9.69	11.33	7.61	10.16	12.66	7.99	10.65	14.10	8.39	11.17	15.61
ii	NDS - II: Demand Based	1.28	1.61	1.76	1.35	1.69	1.99	1.41	1.77	2.23	1.49	1.86	2.50	1.56	1.95	2.78
iii	NDS - III: Demand Based	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
iv	NDS - IV: Demand Based	2.53	3.94	4.32	2.66	4.13	4.86	2.79	4.33	5.45	2.93	4.55	6.09	3.08	4.77	6.76
v	NDS - V: Connected Load Based	0.14	0.07	0.07	0.14	0.07	0.08	0.15	0.07	0.09	0.15	0.07	0.10	0.15	0.07	0.10
3	AGRICULTURAL SERVICE (AS)															
1	LTAS – I: Connected Load Based	0.07	0.00	0.02	0.11	0.00	0.04	0.16	0.00	0.06	0.23	0.00	0.08	0.32	0.00	0.13
ii	LTAS - II: Demand Based	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
iii	LTAS - III: Demand Based	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4	INDUSTRIAL SERVICES (LTIS)	0.83	1.19	1.27	0.92	1.32	1.49	1.03	1.46	1.74	1.15	1.62	2.02	1.28	1.80	2.35
5	PUBLIC UTILITY SERVICES															
i	LTPS-I: Demand Based	0.55	0.86	0.94	0.58	0.90	1.06	0.61	0.94	1.18	0.64	0.99	1.32	0.67	1.04	1.47

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कार्यकारी अभियंता (वि) Executive Engineer (ELE) लक्षद्वीप सं.श.प्र / U.T. of Lakshadweep कवारत्ती /Kavaratti-682 555

		F	Y 2025-	26	F	Y 2026-	27	F	Y 2027-	28	F	Y 2028-	29	F	Y 2029-	30
S. N o.	Categories	Ener gy Sales (MU 's)	Reve nue at Existi ng Tariff	Reven ue at Propo sed Tariff												
ii	LTPS-II: Connected Load Based	0.83	0.92	1.02	0.85	0.95	1.12	0.88	0.98	1.24	0.91	1.01	1.36	0.93	1.04	1.48
iii	LTPS-III: Connected Load Based	0.36	0.56	0.62	0.38	0.59	0.70	0.40	0.62	0.78	0.42	0.65	0.87	0.44	0.68	0.97
6	Electric Vehicle Charging Stations															
i	LTEV-I: Demand Based	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7	HIGH TENSION SUPPLY															
i	HTS-I: Demand Based	2.34	0.00	0.00	2.55	0.00	0.00	2.79	0.00	0.00	3.05	0.00	0.00	3.34	0.00	0.00
ii	HTS-II: Demand Based	0.00	3.43	3.73	0.00	3.75	4.36	0.00	4.10	5.08	0.00	4.49	5.89	0.00	4.91	6.79
8	Total	60.19	44.50	48.86	62.15	46.34	54.37	64.21	48.28	60.28	66.37	50.32	66.65	68.66	52.48	73.38

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#### 5.3.1 Impact of Tariff on Consumers

The revenue gap and the average tariff hike proposed are presented in the table below:

Table 5.4: Revenue Gap and average tariff hike

Sr. No.	Particular	Units	FY 2025-26		FY 2026-27		FY 2027-28		FY 2	028-29	FY 2029-30	
31. 140.			Existing	Proposed	Existing	Proposed	Existing	Proposed	Existing	Proposed	Existing	Proposed
1	Net ARR	Rs. Crores	280.25	280.25	285.38	285.38	232.56	232.56	145.24	145.24	149.75	149.75
2	Revenue	Rs. Crores	44.50	48.86	46.34	54.37	48.28	60.28	50.32	66.65	52.48	73.38
3	Gap (1-2)	Rs. Crores	235.75	231.39	239.04	231.01	184.28	172.28	94.92	78.59	97.27	76.37
4	Total Sales	MU's	60.19	60.19	62.15	62.15	64.21	64.21	66.37	66.37	68.66	68.66
5	Average Cost of Supply (1/4x10)	Rs, per kWh	46.56	46.56	45.92	45.92	36.22	36.22	21.88	21.88	21.81	21.81
6	Average Revenue (2/4x10)	Rs. per kWh	7.39	8.12	7.46	8.75	7.52	9.39	7.58	10.04	7.64	10.69
7	Pure Gap (5-6)	Rs. per kWh	39.17	38.45	38.46	37.17	28.70	26.83	14.30	11.84	14.17	11.12

In view of the above, it is prayed to the Hon'ble Commission that considering the above submission, the proposed hike in tariff for respective years be allowed.

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# 6 Compliance to Directives:

# 6.1.1. Filing of Review and True up of previous years

## Originally issued in Tariff Order dated 31st October 2012

#### Commission's latest directive in Tariff Order dated 10th June 2024

The Commission has considered the True-up of expenses for FY 2019-20. The Commission directs the Petitioner to get the accounts audited for FY 2020-21, FY 2021-22, FY 2022-23 and FY 2023-24 and file the true up petitions along with the next MYT tariff filing for the control period FY 2025-26 to FY 2027-28.

#### Compliance

It is submitted that the Accounts are being compiled and the True-up shall be filed after the same is audited by AG.

## 6.1.2. Capital Expenditure

## Originally issued in Tariff Order dated 31st October 2012

#### Commission's latest directive in Tariff Order dated 10th June 2024

The Commission regrets that despite repeated directions to submit the progress report of capitalization quarterly basis, the Petitioner does not seem concerned at all and have failed to comply the directions of the Commission. The Petitioner has not left any room before the Commission but to initiate Suo-moto proceeding under section 142 of the Electricity act 2023 for imposition of penalty. However, the Commission, giving the Petitioner a last opportunity, directs the Petitioner to submit the progress report of capitalisation on quarterly basis strictly in the format already shared failing which the Commission shall be constant to take action in accordance with the act.

### Compliance

It is submitted that the Department shall submit the Capital Expenditure on quarterly basis from next FY onwards. Hon'ble Commission may kindly consider and allow the same.

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Executive Engineer (ELE)

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# 6.1.3. Improvement of specific fuel consumption

#### Originally issued in Tariff Order dated 31st October 2012

#### Commission's latest directive in Tariff Order dated 10th June 2024

The Commission has observed that the detailed work undertaken for improvement of specific fuel consumption is not being submitted on quarterly basis. The Commission regrets that despite repeated directions to submit the report on fuel consumption on quarterly basis, the Petitioner does not seem concerned at all and have failed to comply the directions of the Commission. The Petitioner has not left any room before the Commission but to initiate Suo-moto proceeding under section 142 of the Electricity act 2023 for imposition of penalty. However, the Commission, giving the Petitioner a last opportunity, directs the Petitioner to submit the report on fuel consumption on quarterly basis strictly in the format already shared failing which the Commission shall be constant to take action in accordance with the act.

#### Compliance

Detailed work undertaken for improvement of specific fuel consumption shall be submitted to Hon'ble Commission on quarterly basis.

6.1.4. Metering of consumer installations/replacement of non-functional or defective meters

Originally issued in Tariff Order dated 31st October 2012

#### Commission's latest directive in Tariff Order dated 10th June 2024

The Commission appreciates the compliance by the Petitioner directs the Petitioner to submit the information on timely manner.

#### Compliance

Status of consumer metering shall be submitted to Hon'ble Commission on quarterly basis.

#### 6.1.5. State Load Despatch Centre

#### Originally issued in Tariff Order dated 19th March 2018

## Commission's latest directive in Tariff Order dated 10th June 2024

The Commission noted the submission and directs the Petitioner to expedite the establishment on priority. The Commission further directs the Petitioner to furnish a detailed report regarding a status of establishment of SLDC with in 60 days from the issuance of this tariff order.

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#### Compliance

The draft report from POSOCO has not yet received. Further Department shall take up the matter with Central Electricity Authority for extending support in this regard. The status of the same shall be communicated to the Hon'ble Commission in due course.

6.1.6. Slab wise details

Originally issued in Tariff Order dated 19th March 2018

Commission's latest directive in Tariff Order dated 10th June 2024

The Commission again directs the Petitioner to provide the island-wise, month-wise and slab-wise detailed break up of number of consumers, connected load and energy sales under each consumer category for the last five years within three months of the issuance of this order. Further, the Commission also directs the Petitioner to maintain and submit monthly island-wise information for category-wise sales, number of consumers, connected load, T&D losses, plant-wise generation/purchase, fuel cost, etc. on quarterly basis within three months of the issuance of this order.

## Compliance

It is submitted that as directed, Department is maintaining the details and same shall be submitted from the next quarter onwards.

6.1.7. Details of upcoming power plants

Originally issued in Tariff Order dated 19th March 2018

Commission's latest directive in Tariff Order dated 10th June 2024

The Commission again directs the Petitioner to submit quarterly the status of the upcoming projects.

Compliance

It is submitted that the details shall be submitted from the next quarter onwards.

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# 6.1.8. Reliability Indices proposal for the control period

### Originally issued in Tariff Order dated 31st March 2022

The draft report from POSOCO has not yet received. Further Department shall take up the matter with Central Electricity Authority for extending support in this regard. The status of the same shall be communicated Hon'ble Commission in due course.

#### Commission's latest directive in Tariff Order dated 10th June 2024

The Commission directs the Petitioner to submit the data of failures for generating plants and distribution network separately for the entire 3rd control period within 30 days of from the issuance of this order. The Commission further directs the Petitioner to submit the trajectory for the Reliability Indices for 4th control period (i.e. FY 2025-26 to FY 2027-28) along with filing of the Business Plan for the next control period.

## Compliance

## 6.1.9. Proposal for implementation of kVA/kVAh tariff for HTConsumers

#### Originally issued in Tariff Order dated 28th March 2023

#### Commission's latest directive in Tariff Order dated 10th June 2024

The Commission noted the submission and directs the petitioner that all HT consumers should be compliant for kVAh billing by 31st March 2025.

#### Compliance

Department has requisite infrastructure to implement the same.

#### 6.2. New Directives issued in this Order

#### 6.2.1. Submission of separate tariff rates for Agriculture consumers

As per the comments received by the stakeholders, the Commission has instructed the department to include pertinent facts and a tariff recommendation for agricultural customers in the upcoming tariff petition.

#### Compliance

It is submitted that separate tariff rates for agricultural consumers has been proposed in the instant petition.

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