



जवाहरलाल नेहरु पत्तन प्राधिकरण  
JAWAHARLAL NEHRU PORT AUTHORITY

ISO 9001 : 2015  
ISO 14001 : 2015  
ISO 27001 : 2013  
ISO 45001 : 2018

पत्तन कार्यालय : प्रशासन भवन, शेवा, नवी मुंबई - 400707. Port Office : Administration Bldg., Sheva, Navi Mumbai - 400 707.  
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Ref No: JNPT/MERC/MTR/002

20 December, 2022

The Secretary,  
Maharashtra Electricity Regulatory Commission,  
13th Floor, Centre No. 1, World Trade Centre,  
Cuffe Parade,  
Mumbai 400 005

Dear Sir,

**Sub:** Reply to Data gaps – Set 1 and Set 2 in relation to MTR Petition filed by JNPT-SEZ.

**Ref:** Email dated 9 December and 10 December 2022

The Hon'ble Commission vide its *email dated 9 December and 10 December 2022* raised data gaps in relation to MTR Petition filed JNPT SEZ.

The reply to data gaps raised by the Hon'ble Commission is enclosed herewith for kind consideration.

Thanking You,

For Jawaharlal Nehru Port Trust SEZ

Authorised Signatory

**Encl:** Reply to Data gaps dated 9 December 2022 and 10 December 2022 along with Exhibits

**Reply to TVS Data Gaps - Set 1**

**Petition of M/s. Jawaharlal Nehru Port Trust (JNPT) for approval of Truing-up of FY 2021-22, Provisional Truing-up of FY 2022-23 and Aggregate Revenue Requirement (ARR) and Tariff for the Multi-Year Tariff period for FY 2023-24 and FY 2024-25 for its Distribution Business in accordance with Regulation 5.1 (b) of the Maharashtra Electricity Regulatory Commission (Multi Year Tariff) Regulations, 2019.**

Sr. No	Reference to the Petition	Description/Query	JNPT Reply
<b>Executive Summary and MYT Petition</b>			
1.	Executive Summary	Petitioner should submit the Executive Summary of its MYT Petition having the summary brief approach of the Truing-up years, Provisional True-up year and ARR for the ensuing years along with the ARR summary table.	The Executive Summary of the Petition is enclosed herewith and marked as <b>Exhibit ‘A’</b> .
2.	ARR Claims	Since the claimed expenses and revenue of the Petitioner is typically in Rs. Lakh as per the Allocation Statement. Thus, Petitioner instead claiming its entire ARR in Rs. Crore shall claim in ‘Rs. Lakh’ up to two decimal places.	JNPT submits that expenses and revenue as per the Allocation Statement are in ‘Rs’. However, we have submitted the entire ARR in Rs. Crore considering the fact that it is normally adopted practice by all Utilities while submitting the Petition.
3.	Allocation Statement	Petitioner has submitted the Allocation statement for its Distribution Business. However, Petitioner the Allocation Statement does not have any reference to the Auditor Note referring to the methodology of allocating the accounts from JNPT (as an entity) to Distribution Business. Thus, Petitioner is required submit the complete Allocation statement, methodology of allocation of common expenses from the main business to the distribution business, if any,	Allocation Statement submitted as Annexure ‘3’ to the Petition in Note 22-Employee Benefit Expenses (Pg 82 of the Petition) and Note 25 – Other Expenses (Pg 83 of the Petition) specify that the allocation of the Employee Expenses and part of A&G expense has been considered at 30 paise/unit and 10 paise/unit respectively.  As submitted in the Petition, JNPT is utilising the services of Jawaharlal Nehru Port Authority (Corporate Entity) and such

Sr. No	Reference to the Petition	Description/Query	JNPT Reply
		basis of preparing the allocation statement with Auditor Notes wherever applicable.	expenses are not segregated under O&M expenses for Distribution Business. However, JNPT, based on the Employee and A&G expense approved by the Hon'ble Commission for other SEZs in the State have considered the benchmark for the Employee Expense and A&G expense for FY 2021-22. The said expenses are escalated for each year as per WPI / CPI Escalation Index specified in the MERC MYT Regulations, 2019.
4.	Projections for next 10 years	Considering this is the first Tariff petition for the Licensee, the Petitioner is requested to submit projections for consumer category-wise no. of consumers, load, sales and demand in the next 10 year period. Such projections should be submitted in different scenarios such as optimistic, pessimistic and realistic.	<p>JNPT submits that considering the pandemic situation and scenario caused due to outbreak of COVID-19, it has affected growth in manufacturing and industrial sector and thereby affecting the potential load growth of licensee area. It is submitted that based on the actual sales/loading upto October 2022 and progress of work of various entities to whom land was allotted, it is expected that loading is likely to increase to 1.5 MW by 2023-24 and 2.3 MW by 2024-25.</p> <p>JNPT humbly submits that there is no clear visibility on the load growth as it is completely based on the revival of economic activity leading to allotment of land and progress of work even after land is allotted to them. JNPT will approach the Hon'ble Commission once there is clear visibility of growth and accordingly submit the projections in different scenarios while taking requisite approval of power procurement.</p>

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5.	Cost audit report required	Cost audit report as per Regulation 23.4 of MYT Regulations 2019 justifying revenue expenses is not provided. Petitioner to provide the same.	JNPT submits that Cost Audit Report is not prepared and hence cannot be submitted.												
Data Gaps related to CAPEX & Capitalisation															
6.	Para 3.8.5.	<p>Petitioner to provide clarifications on the following:</p> <p>a. The Net Fixed Asset (NFA) as on 31 March 2022 is Rs. 113.94 Crore as per Note 2 of the Allocated Statement, however, under the referred paragraph, Petitioner has sought the in-principal approval from the Commission on the same NFA cost of Rs. 113.94 Crore. The Petitioner to clarify why the in-principal approval is claimed on the depreciated value of the asset.</p> <p>b. The Gross Fixed Asset as per Note 2 of the Allocated Statement during FY 2021-22 is Rs. 117.11 Crore, however, Petitioner under the referred paragraph submitted that, Rs. 104.26 Crore is capitalised during FY 2021-22. Petitioner to provide clarification on such discrepancy and provide the basis for considering the Rs. 104.26 Crore as the capitalised cost.</p>	<p>a. JNPT submits that it has claimed total capex (GFA) of Rs 113.9461457 Crore as per Note 2 of the Allocated Statement which does not include the capital cost related to Street light, whereas NFA as per Note 2 is Rs 113.9322455 Crore.</p> <p>b. It is submitted that total GFA is Rs 117.11 Crore which includes assets capitalised as well as Work in Progress as on 31.03.2022. The reconciliation of the same is as given below:</p> <table><tr><th>Particulars of Capex</th><th>Amount in Rs</th></tr><tr><td>Capitalisation as per Allocation Statement</td><td>1,17,11,41,936</td></tr><tr><td>Less: Capitalisation not claimed related to Street Light</td><td>12,85,20,000</td></tr><tr><td><b>Capitalisation claimed in MTR Petition - Put to Use</b></td><td><b>1,04,26,21,936</b></td></tr><tr><td>CWIP as per Allocation Statement</td><td>9,68,39,521</td></tr><tr><td><b>Total CAPEX claimed in MTR</b></td><td><b>1,13,94,61,457</b></td></tr></table>	Particulars of Capex	Amount in Rs	Capitalisation as per Allocation Statement	1,17,11,41,936	Less: Capitalisation not claimed related to Street Light	12,85,20,000	<b>Capitalisation claimed in MTR Petition - Put to Use</b>	<b>1,04,26,21,936</b>	CWIP as per Allocation Statement	9,68,39,521	<b>Total CAPEX claimed in MTR</b>	<b>1,13,94,61,457</b>
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			Accordingly, JNPT has considered Rs 104.26 Crore towards capex which is put to use.																							
7.	Put to use of the Assets Capitalised	<p>a. Petitioner to confirm whether the entire CAPEX plan proposed before the Commission is capitalised <b>entirely</b> on Put-to-use basis during FY 2021-22 as per Regulation 24 of the MERC Tariff Regulations 2019.</p> <p>b. In case of part capitalisation, Petitioner should submit the asset wise break-up along with its respective capitalised cost and Put-to-use year, duly reconciled with the Allocated Statement for FY 2021-22.</p> <p>c. JNPT has highlighted the clause 3.12 of the Capex Regulations to claim capitalization based on asset loading, however, as per these Regulations, the licensee can claim the capitalization in proportion to actual asset loading, subject to achievement of minimum asset loading of twentyfive (25) percent. JNPT’s assets are yet to reach loading of 25%. Hence, JNPT to justify the capitalization claimed.</p> <p>d. JNPT to confirm that all its distribution assets including EHV Substation are within its Licence area boundary. Also, same are not connected to the establishments outside the Licence area.</p>	<p>a. Refer reply to query 6 (b) above</p> <p>b. The asset wise break up, which is put to use, is as given below:</p> <table><tr><th>No.</th><th>Fixed asset</th><th>Capital Cost in Rs. (As per Audited Accounts)</th></tr><tr><td>1</td><td>220/33Kv Substation with allied works including civil work</td><td>46,01,38,474</td></tr><tr><td>2</td><td>33/11Kv Substation with allied works including civil work</td><td rowspan="2">62,02,05,432</td></tr><tr><td>3</td><td>UG Cable, cable Trench, RMU and allied work</td></tr><tr><td>4</td><td>Project Management Consultancy (220/33Kv SS)</td><td>2,02,00,000</td></tr><tr><td>5</td><td>Project Management Consultancy (downstream network)</td><td>1,01,35,800</td></tr><tr><td>6</td><td>Supervision charges paid to MSETCL</td><td>2,87,81,751</td></tr><tr><td></td><td><b>Total</b></td><td><b>113,94,61,457</b></td></tr></table> <p>c. It is submitted that if capitalisation is to be claimed subject to minimum asset loading of 25%, it would lead to situation of zero capex being allowed even if power is being supplied to consumers using the assets which even after being put to</p>	No.	Fixed asset	Capital Cost in Rs. (As per Audited Accounts)	1	220/33Kv Substation with allied works including civil work	46,01,38,474	2	33/11Kv Substation with allied works including civil work	62,02,05,432	3	UG Cable, cable Trench, RMU and allied work	4	Project Management Consultancy (220/33Kv SS)	2,02,00,000	5	Project Management Consultancy (downstream network)	1,01,35,800	6	Supervision charges paid to MSETCL	2,87,81,751		<b>Total</b>	<b>113,94,61,457</b>
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			<p>use is not allowed to be claimed in tariff. Accordingly, JNPT submits that the capitalisation is not claimed for the entire capex put to use but in proportion to the actual asset loading considering the fact that if entire capex of Rs 104.26 Crore is claimed it will burden the consumer considering the lower sales.</p> <p>d. JNPT confirms that all its distribution assets including EHV Substation are within its Licence area boundary and are not connected to the establishments outside the Licence area.</p>
8.	Asset Loading	<ul style="list-style-type: none"> <li>Petitioner under Para. 3.8.5 of its Petition has referred to Regulation 3.12 of the MERC (Approval of Capital Investment Schemes) Regulations, 2022 for proportionating the capex/capitalisation to actual asset loading. However, it is observed that, the Load (MW) for different years submitted as per Format F1.5 is different from the Load (MW) used for proportionating the Capitalisation of the assets for the respective years. Thus, the Petitioner is required to provide clarity for the highlighted discrepancy.</li> </ul>	JNPT submits that it will correct the inadvertent linkage error in revised Tariff Model and Petition.
<b>Truing -up of FY 2021-22 and Provisional True-up of FY 2022-23, ARR for FY 2023-24 and FY 2024-25</b>			
9.	Reconciliation statement	<ul style="list-style-type: none"> <li>Please provide reconciliation statement of the numbers in the petition format and numbers in the audited accounts.</li> </ul>	The reconciliation statement along with remarks is annexed hereto and marked as <b>Exhibit 'B'</b> .

Sr. No	Reference to the Petition	Description/Query	JNPT Reply
10.	Power Purchase Cost (Table 3.6)	<p>a. Petitioner has claimed the Power Purchase Cost of Rs. 0.60 Crore during FY 2021-22, however, the Net Power Purchase Cost booked as per the Audited Allocation Statement is Rs. 1.32 Crore for the same year. Thus, Petitioner should provide the justifications for such discrepancy and provide the reconciliation of the actual power purchase cost claimed under the present petition with the Audited Allocation Statement for FY 2021-22.</p> <p>b. Petitioner should provide the break-up Solar RECs and Non-Solar RECs purchased during FY 2021-22 with respective quantum and cost details. In addition, Petitioner shall also demonstrate the RPO compliance for FY 2021-22 w.r.t. to Solar and Non-Solar Target applicable for FY 2021-22 as per “Maharashtra Electricity Regulatory Commission (Renewable Purchase Obligation, its Compliance and Implementation of Renewable Energy Certificate Framework) Regulations, 2019.</p> <p>c. Petitioner shall also submit a separate table for estimating the RPO compliance for Solar and Non-Solar targets for FY 2022-23 to FY 2024-25 as per the applicable targets for the respective years in lines with MERC (RPO) Regulations, 2019 and provides its plan</p>	<p>a. The reconciliation statement along with remarks is annexed hereto and marked as <b>Exhibit ‘B’</b>.</p> <p>b. JNPT submits that it has purchased 80 Solar RECs and 150 Non-Solar RECs to meet the RPO for FY 2021-22. However, considering the Input Energy of 1.46 MU, there is shortfall of 0.01 MU for Solar and 0.02 MU for Non-Solar. The consolidated table is given below in reply of query below.</p> <p>As elaborated in the reply of the query below, JNPT has proposed to meet the RPO shortfall for FY 2021-22 and FY 2022-23 by purchasing RE power in FY 2023-24 to lower the impact on tariff of its consumers.</p> <p>c. JNPT submits that it has proposed to meet RPO targets for FY 2022-23 by way of purchase of REC and any shortfall shall be carried forward to FY 2023-24. It is submitted that JNPT has filed the Petition on 29 November, 2022 and has considered actual REC purchase as on date of filing the Petition. However, subsequently on 30 November, 2022 it has purchased REC (85-Solar and 125-Non-Solar) to meet the RPO. JNPT will consider the said purchase of REC’s in the revised Petition and also accordingly revise the RE</p>

Sr. No	Reference to the Petition	Description/Query	JNPT Reply																																																																								
		for compliance of the RPO	<p>power required for FY 2023-24 and FY 2024-25.</p> <p>JNPT requests the Hon’ble Commission to allow carry forward of RPO shortfall for FY 2021-22 and FY 2022-23 to FY 2023-24. It is proposed to purchase RE Power to meet the RPO for FY 2023-24 and FY 2024-25. The table giving details of the RPO target and achievement by JNPT in the table below:</p> <table><tr><th>RPO Targets &amp; Achievement</th><th>Units</th><th>FY 2021-22</th><th>FY 2022-23</th><th>FY 2023-24</th><th>FY 2024-25</th></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Total Energy Requirement</td><td>MU</td><td>1.46</td><td>5.24</td><td>9.62</td><td>14.32</td></tr><tr><td>Solar RPO target</td><td>%</td><td>6.00%</td><td>8.00%</td><td>10.50%</td><td>13.50%</td></tr><tr><td>Solar RPO target</td><td>MU</td><td>0.09</td><td>0.42</td><td>1.01</td><td>1.93</td></tr><tr><td>Solar RPO Achievement</td><td>MU</td><td>0.08</td><td>0.35</td><td>1.09</td><td>1.93</td></tr><tr><td>Solar RPO Shortfall/(Surplus)</td><td>MU</td><td>0.01</td><td>0.08</td><td>-</td><td>-</td></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Non-Solar RPO target</td><td>%</td><td>11.50%</td><td>11.50%</td><td>11.50%</td><td>11.50%</td></tr><tr><td>Non-Solar RPO target</td><td>MU</td><td>0.17</td><td>0.60</td><td>1.11</td><td>1.65</td></tr><tr><td>Non-Solar RPO Achievement</td><td>MU</td><td>0.15</td><td>0.50</td><td>1.23</td><td>1.65</td></tr><tr><td>Non-Solar RPO Shortfall/(Surplus)</td><td>MU</td><td>0.02</td><td>0.12</td><td>-</td><td>-</td></tr></table>	RPO Targets & Achievement	Units	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25							Total Energy Requirement	MU	1.46	5.24	9.62	14.32	Solar RPO target	%	6.00%	8.00%	10.50%	13.50%	Solar RPO target	MU	0.09	0.42	1.01	1.93	Solar RPO Achievement	MU	0.08	0.35	1.09	1.93	Solar RPO Shortfall/(Surplus)	MU	0.01	0.08	-	-							Non-Solar RPO target	%	11.50%	11.50%	11.50%	11.50%	Non-Solar RPO target	MU	0.17	0.60	1.11	1.65	Non-Solar RPO Achievement	MU	0.15	0.50	1.23	1.65	Non-Solar RPO Shortfall/(Surplus)	MU	0.02	0.12	-	-
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			The certificate issued by IEX towards purchase of REC is annexed hereto and marked as <b>Exhibit ‘C’</b> .
11.	Para 3.7.6	<ul style="list-style-type: none"> <li>In table 3-8 in column titled category of expenses - ‘Operating &amp; Admin Exp’ and ‘A&amp;G Expenses’ need to be interchanged. Please correct the error.</li> </ul>	JNPT submits that inadvertent error will be corrected in the revised Petition.
12.	Distribution Loss	<ol style="list-style-type: none"> <li>Petitioner has claimed the Distribution loss of 36.92% during FY 2021-22 on account of higher No-Load Losses. In this context, Petitioner shall submit the details of equipment wise guaranteed no-load loss, guaranteed no load loss, equipment full load capacity, number of hours of operation in a year, actual loading of the equipment’s (Distribution Transformers, etc) vis-à-vis full load capacity loading.</li> <li>Petitioner to clarify whether it has taken all necessary steps for reducing the no load loss.</li> <li>Petitioner should submit the actual T&lt;math&gt;\Delta&lt;/math&gt;D Interface drawl/consumption in MU duly certified by the Maharashtra SLDC for FY 2021-22.</li> </ol>	<ol style="list-style-type: none"> <li>The relevant details of transformer wise losses and loading is annexed hereto and marked as <b>Exhibit ‘D’</b>.</li> <li>It is submitted that the Petitioner has optimised the operations of the network by switching off the equipments based on the demand and is likely to achieve much lower losses in FY 2022-23 (estimated as 14.05%) as compared to FY 2021-22 (36.92%).</li> <li>JNPT submits that it has requested MSLDC to certify the actual T&lt;math&gt;\Delta&lt;/math&gt;D drawl vide its email dated 1 November, 2022 and 13 December, 2022, enclosed as <b>Exhibit ‘E’</b>. The same is yet to be received and the same will be submitted as soon as the certificate is issued by MSLDC.</li> </ol>
13.	O&M Expenses	<ul style="list-style-type: none"> <li>Petitioner under Para. 3.7.9 of its MYT Petition has claimed the R&amp;M Expenses in proportion to actual and estimated load of the JNPT SEZ. However, Petitioner should clarify whether, it is foregoing the R&amp;M Expenses booked for the respective financial years or</li> </ul>	JNPT submits that it will claim R&M expenses in proportion to actual load of the JNPT SEZ at the time of truing up of respective years (FY 2022-23 to FY 2024-25) and not at actuals.

Sr. No	Reference to the Petition	Description/Query	JNPT Reply
		the same shall be recovered subsequently as and when the load increases. In case, if the same is being proposed to be recovered in the subsequent years, the Petitioner is required to demonstrate the overall impact of the cost burden for the respective financial years i.e., from FY 2021-22 to FY 2024-25.	
14.	Table 3-9, Table 3-10 and Table 3-11	<ul style="list-style-type: none"> <li>a. The values for A&amp;G Expenses and R&amp;M expense in table 3-11 are interchanged with respect to those in Table 3-9 and Table 3-10.</li> <li>b. Please provide separate table in the petition for year-wise total Employee expenses. The same is missing in the current petition.</li> <li>c. The Petitioner should provide the numbers of category-wise employees dedicated to the Distribution business, for each year till date since operationalization of the Distribution business.</li> <li>d. The Petitioner has stated that is utilising the services of JNPT Authority (Corporate Entity) and such expenses are not segregated under O&amp;M expenses for Distribution Business. However, JNPT, based on the Employee and A&amp;G expense approved by the Commission for other SEZs in the State have considered the benchmark such as for the Employee Expense - 30 paise/unit and A&amp;G expense - 10</li> </ul>	<ul style="list-style-type: none"> <li>a. JNPT submits that it will correct the inadvertent error in the revised Petition.</li> <li>b. JNPT submits that it will include the same in the revised Petition</li> <li>c. JNPT submits that being an initial phase of the license, whereby the load has not commensurate as per the load envisaged at the time of commencement of distribution business due to various reasons, JNPT has allocated common employees of JNPA to look after the distribution business. Hence there are no dedicated employees at present allocated to JNPT Distribution licensee business.</li> <li>d. JNPT submits that considering the miniscule business activity of SEZ at present, JNPA (Corporate Entity equivalent) provides the support related to employee allocation, common services of Central Procurement, Group Finance and HR, Centralized IT services, Administration, Security and other common departments. JNPT submits that similar to integrated utilities, common</li> </ul>

Sr. No	Reference to the Petition	Description/Query	JNPT Reply
		<p>paaise/unit for FY 2021-22. In this context, it is expected that the actual expenses are required to be claimed for truing up years. It appears that for JNPT Distribution Licensee, there is no outflow currently towards such expenses (and also no outflow expected in future too). The Licensed businesses are expected to be undertaken in water-tight compartment. Further, although JNPT has benchmarked the employee and A&amp;G expenses based on other SEZs, no fixed ratio exists between the sales and these expenses. Also, other SEZs are privately own SEZs whereas JNPT is Government owned entity. Hence, JNPT needs to justify its submissions on the employee expenses and A&amp;G expenses.</p>	<p>cost is allocated to each segment of business and the similar approach was undertaken by Reliance Infrastructure Limited (RInfra) whereby the Corporate expenses of RInfra represent the expenses pertaining to common services of Central Procurement, Group Finance and HR, Centralized IT services, Administration, Security and other common departments where the resources and personnel available were rendering the services to the entire RInfra Corporate and accordingly the expenses pertaining to these departments were allocated to all the individual business segments within RInfra, such as the Mumbai energy vertical, EPC business, Wind power plants, etc., on the basis of Turnover of these individual business segments. Hence the precedence of such cases are also available. Accordingly, similar methodology has been adopted by JNPT. JNPT would like to submit that as stated in the query that there is no actual outflow currently towards such expenses is incorrect as such expenses are incurred for the distribution business but by JNPA and then allocated to JNPT based on the principles as specified in the Allocation statement. Further, JNPT submits that even though the benchmark considered are of private licensee whereas JNPT is a government entity, the activities related to operation of distribution business more or less remains</p>

Sr. No	Reference to the Petition	Description/Query	JNPT Reply
			same. Also, as provided in the calculation in MTR petition format “Sheet – Others”, the average of private and government licensee (MADC) has been considered whereby it is noticed that even within private licensee, there is a major variation in the O&M expenses whereby in the initial year the O&M cost is on a higher side. However, JNPT in its submission has considered the average O&M expenses of 4 years of private and Government licensee and JNPT has adopted a more rationale approach for claiming O&M expenses.
e.	Interest on Long Term Loan (Para. 3.11.3)	Petitioner to submit the weighted average Interest Rate Certificate of 3.28% duly certified from the Auditor for FY 2021-22 and FY 2022-23 up to H1 or latest available month.	We will revert to the same shortly.
f.	Contribution to Contingency Reserves (Table 3.21)	Petitioner to clarify whether there is any investment made for the Contribution to Contingency reserve during FY 2022-23 as per the Regulation 35.1 of the MERC MYT Regulations, 2019. If yes, the relevant documentary evidence shall be submitted for the invested amount.	JNPT submits that since the opening GFA has been zero for both Wires and Retail Supply Business, Contribution to Contingency Reserve has not been claimed for FY 2021-22. Accordingly, there is no investment made during FY 2022-23.
g.	Return on Equity (Para. 3.13.5)	a. Petitioner to submit the computation of arriving at the <b><u>wire’s availability of 99.80%</u></b> as per the formula provided under Regulation 29.8 of the MERC MYT Regulations, 2019. Further, the Petitioner to also provide the SAIDI recorded for FY 2021-22 duly	a. We will revert to the same shortly.  b. It is submitted that JNPT commenced its operations in August 2021 and FY 2021-22 is first year of commencement of operations. Accordingly, the

Sr. No	Reference to the Petition	Description/Query	JNPT Reply
		<p>certified by the Auditor.</p> <p>b. Petitioner to submit the auditor certificate for certifying its <b><u>collection efficiency of 99.50%</u></b> for FY 2020-21 with respect to Revenue billed to its consumers vis-à-vis Revenue booked during FY 2021-22 as per the Allocated Statement submitted as part of the present Petition.</p>	<p>collection of billing done during the month March 22 is in the month of April 22. JNPT has considered the said collection in FY 2021-22 for computing Collection Efficiency. During the normal course of operations, there would be overlap of collection in the month of April which would not have any impact. Considering the 1<sup>st</sup> year of operation, JNPT requests the Hon'ble Commission to consider the Collection Efficiency 99.50% for FY 2021-22. The certificate will be submitted shortly.</p>
18.	Consumer security deposit (Para. 3.12.2)	JNPT SEZ has considered 5% increase in CSD from FY 2022-23 to FY 2024-25 on account of lack of past data. Is there any basis such as increase in load over the year considered while assuming 5% increase in CSD? If yes, please provide details.	JNPT has projected the Consumer Security Deposit (CSD) by considering 5% increase in CSD from FY 2022-23 to FY 2024-25, on account of lack of past data. The actual increase in CSD shall be submitted at the time of Truing-up for the respective years
19.	Revenue from sale of electricity (Table 3.23)	<ul style="list-style-type: none"> <li>The Petitioner has booked the total revenue from operations for FY 2021-22 as per the Allocation Statement is Rs. 0.76 Crore, out of which the revenue booked from sale to electricity consumers is Rs. 0.62 Crore. It is observed that, under the referred table, the total revenue claimed by the Petitioner for FY 2021-22 is Rs. 0.87 Crore. Thus, Petitioner is required to provide the justifications for such highlighted discrepancy.</li> </ul>	<ul style="list-style-type: none"> <li>JNPT would like to submit that as per Allocation Statement, Revenue from Sale of Electricity is Rs. 0.76 Crore which includes sale of power to JNPT-SEZ itself as well as to other consumers. Since the power is sold to JNPT SEZ, the same is also charged at approved tariff and is part of the revenue.</li> <li>JNPT would like to submit that at the time of preparation of the allocation statement, the revenue was considered equivalent to the electricity billed till March 2022.</li> </ul>

Sr. No	Reference to the Petition	Description/Query	JNPT Reply																																											
		<ul style="list-style-type: none"> <li>Further, the Petitioner should also reconcile the category wise revenue realised during FY 2021-22 with the Audited Allocation statement.</li> <li>Please provide the basis for estimation of category-wise revenue in FY 2022-23.</li> </ul>	<p>However, energy consumed in March 2022 against which the bill were raised in April 2022 was not considered as a part of Revenue in Allocation Statement but the same has been included in the Revenue in MTR Petition. the Reconciliation of the same is outlined in the following table:</p> <table border="1"> <thead> <tr> <th rowspan="2">Component of Revenue</th><th colspan="3">Revenue Billed</th></tr> <tr> <th>Till March</th><th>in April</th><th>Total</th></tr> </thead> <tbody> <tr> <td>Demand Charges</td><td>0.237</td><td>0.053</td><td>0.290</td></tr> <tr> <td>Energy Charges</td><td>0.382</td><td>0.133</td><td>0.516</td></tr> <tr> <td>Wheeling Charges</td><td>0.055</td><td>0.018</td><td>0.073</td></tr> <tr> <td>TOD Charges</td><td>-0.001</td><td>-0.001</td><td>-0.002</td></tr> <tr> <td>Prompt Payment Discount</td><td>-0.004</td><td></td><td>-0.004</td></tr> <tr> <td>Revenue as per MTR</td><td><b>0.669</b></td><td><b>0.203</b></td><td><b>0.872</b></td></tr> <tr> <td>Electricity Duty</td><td>0.077</td><td>0.034</td><td>0.110</td></tr> <tr> <td>TOSE</td><td>0.012</td><td>0.004</td><td>0.016</td></tr> <tr> <td><b>Total Revenue as per Allocation Statement</b></td><td><b>0.758</b></td><td><b>0.241</b></td><td><b>0.999</b></td></tr> </tbody> </table> <ul style="list-style-type: none"> <li>JNPT would like to submit that as specified in the MTR Petition, it is presently supplying to 17 Consumers with Contract Demand of 2.15 MVA and has total demand of upto 1 MW. Further, JNPT has received additional applications for 0.85 MVA for supply of regular power in FY 2022-23. Also, actual sales/loading upto October 2022 has been considered and future projection is based on the application received from other consumers. Further for estimating the revenue, Wheeling charges and fixed</li> </ul>	Component of Revenue	Revenue Billed			Till March	in April	Total	Demand Charges	0.237	0.053	0.290	Energy Charges	0.382	0.133	0.516	Wheeling Charges	0.055	0.018	0.073	TOD Charges	-0.001	-0.001	-0.002	Prompt Payment Discount	-0.004		-0.004	Revenue as per MTR	<b>0.669</b>	<b>0.203</b>	<b>0.872</b>	Electricity Duty	0.077	0.034	0.110	TOSE	0.012	0.004	0.016	<b>Total Revenue as per Allocation Statement</b>	<b>0.758</b>	<b>0.241</b>	<b>0.999</b>
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Sr. No	Reference to the Petition	Description/Query	JNPT Reply
			charges are considered as per MSEDCL Tariff Order dated 30 <sup>th</sup> March 2020 as the same being the ceiling tariff for JNPT. With respect to energy charges, the Hon'ble Commission vide its Order dated 30 January, 2021 in Case No. 5 of 2021, had approved the ceiling tariff for JNPT as the Tariff that is applicable for the respective category of consumers in the MSEDCL area of supply, as modified from time to time and has approved the corresponding Tariff Schedule for Industrial Tariff for Industrial consumers and Commercial Tariff for the facilities established within the licence area of JNPT. JNPT submits that as per Order of the Hon'ble Commission, it was allowed to levy ceiling tariff of MSEDCL. Accordingly, JNPT has levied the tariff considering the MSEDCL tariff as ceiling tariff and not exceeded the MSEDCL tariff for any tariff category.
20.	Provisional Accounts FY 2022-23	<ul style="list-style-type: none"> <li>Petitioner to submit the Provisional Allocated Statement for FY 2022-23 for H1 or up to latest available month.</li> </ul>	The statement will be submitted along with the revised Petition.
21.	Income Tax	<ul style="list-style-type: none"> <li>Petitioner to submit the ITR acknowledgement for the tax paid during FY 2021-22 (JNPT as an entity) to verify the effective tax rate.</li> </ul>	The ITR acknowledgement for the tax paid for FY 2021-22 is annexed hereto and marked as <b>Exhibit 'F'</b> .
22.	Form 12	<ul style="list-style-type: none"> <li>Petitioner for computing the Effective tax rate has considered the gross income from the Regulated entity</li> </ul>	JNPT submits that revenue of regulated entity (JNPT SEZ) is 0.76 Crore whereas revenue of Rs 859.65 Crore is of JNPA,

Sr. No	Reference to the Petition	Description/Query	JNPT Reply
		as Rs. 859.65 Crore, however, the total income/revenue booked as per the allocation statement's P&L statement is Rs. 0.76 Crore. Petitioner should provide the justification for such discrepancy highlighted above.	which is a corporate entity. Hence, the revenue of only regulated entity is being considered in the Petition.
23.	Form 9	<ul style="list-style-type: none"> <li>Petitioner should do the total summation of the Non-Tariff Income claimed for the respective years.</li> </ul>	JNPT will comply with the same in the revised Petition.
<b>Data Gaps related to Tariff Philosophy and Schedule of Charges</b>			
24.	Paragraph 4.3	<ul style="list-style-type: none"> <li>On 21<sup>st</sup> July 2022 MERC has published Guidelines for allocation of assets and cost at different voltage levels for distribution. The guidelines are available on MERC's website. The Petitioner is required to refer the guidelines and submit (i) roadmap for acquisition of requisite hardware and software (according to guideline 6.2) and (ii) submit its asset ratios and consequent division of various items of Distribution Wires ARR over different voltages (according to guideline 6.1).</li> <li>Petitioner should submit the voltage wise asset details along with the respective cost break-up for the respective financial years.</li> </ul>	JNPT submits that it has claimed capitalisation in proportion to the load and also claimed wheeling charges without bifurcating the same into HT and LT. It is submitted that since JNPT has claimed lower capitalisation than actually incurred, it is difficult to bifurcate the same voltage-wise as sought for in the data gaps.
25.	Paragraph 4.4	<ul style="list-style-type: none"> <li>Petitioner to provide the basis for estimating the Fixed Charges for FY 2023-24 and FY 2024-25.</li> </ul>	JNPT submits that the fixed charges for Revenue as proposed were envisaged to meet the fixed cost as envisaged in the ARR



Sr. No	Reference to the Petition	Description/Query	JNPT Reply																								
		<ul style="list-style-type: none"><li>Petitioner to further clarify, whether the Fixed Cost recovery for the ensuing years will be recovered from the proposed Fixed Charges across the Consumer Categories or some part of the Fixed Component is proposed to be recovered through Energy Charges.</li></ul>	<p>– Retails Supply business and outlined as below:</p> <table><tr><th>Particulars</th><th>2023-24</th><th>2024-25</th></tr><tr><td>Revenue from Demand</td><td>1.43</td><td>1.90</td></tr><tr><td><b>Fixed Cost</b></td><td></td><td></td></tr><tr><td>ARR of Retails Supply business</td><td>5.37</td><td>8.05</td></tr><tr><td>Less: 85% of power purchase cost</td><td>3.91</td><td>5.91</td></tr><tr><td></td><td></td><td></td></tr><tr><td><b>Fixed Cost</b></td><td><b>1.46</b></td><td><b>2.14</b></td></tr><tr><td><b>Fixed Cost Recovery*</b></td><td><b>102%</b></td><td><b>113%*</b></td></tr></table> <p>*- Table may revise the same in Revised MTR submission based on the revised ARR due to changes to be incorporated in response to Data gaps raised by the Hon’ble Commission</p>	Particulars	2023-24	2024-25	Revenue from Demand	1.43	1.90	<b>Fixed Cost</b>			ARR of Retails Supply business	5.37	8.05	Less: 85% of power purchase cost	3.91	5.91				<b>Fixed Cost</b>	<b>1.46</b>	<b>2.14</b>	<b>Fixed Cost Recovery*</b>	<b>102%</b>	<b>113%*</b>
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26.	Paragraph 4.7	<ul style="list-style-type: none"><li>Petitioner to submit a proper detailed ‘Schedule of Charges’ proposed for the ensuing years i.e., FY 2023-24 and FY 2024-25, while referring to the charges approved for MSEDCL as proposed in the present Petition.</li></ul>	<p>JNPT submits that being an SEZ it has developed the network in a manner that any new Consumer is able to get the connection in plug and play manner and no incremental network is required to be laid by Distribution Licensee to release supply to the Consumer. Accordingly, JNPT is not proposing any Schedule of Charges for release of supply to Consumer except for the following charges as given below:</p> <p>A. Administrative Charges for Dishonouring the Cheque – Rs 750 or Bank Charges whichever is higher.</p> <p>B. Processing Fees for Open Access – Rs 2500/- per application</p> <p>C. Operating Charges for Open Access – Rs 2500/- per</p>																								

Sr. No	Reference to the Petition	Description/Query	JNPT Reply
			<p>month.</p> <p>The aforesaid charges are being proposed in line with the charges approved for other SEZ's in the State. Further, same would be included in the revised Petition.</p>

**Reply to Data Gaps-Set-2 dated 10.12.2022**

**Petition of M/s. Jawaharlal Nehru Port Trust (JNPT) for approval of Truing-up of FY 2021-22, Provisional Truing-up of FY 2022-23 and Aggregate Revenue Requirement (ARR) and Tariff for the Multi-Year Tariff period for FY 2023-24 and FY 2024-25 for its Distribution Business in accordance with Regulation 5.1 (b) of the Maharashtra Electricity Regulatory Commission (Multi Year Tariff) Regulations, 2019.**

Sr No	Reference to the Petition	Description/Query	JNPT Reply																											
Truing -up of FY 2021-22 and Provisional True-up of FY 2022-23, ARR for FY 2023-24 and FY 2024-25																														
1.	Power Purchase Cost (Table 3.6)	<ul style="list-style-type: none"><li>Petitioner to provide the REC Certificates of both Solar and Non-Solar along with the payment receipts for FY 2021-22 and FY 2022-23 (available upto latest months)</li></ul>	The copy of the REC Certificates are annexed marked as <b>Exhibit ‘C’</b> to reply of Data gaps Set-1.																											
2.	Existing Tariff	<ul style="list-style-type: none"><li>Petitioner under para 2.3.1. has submitted the following: “.....Accordingly, from 11 August, 2021, <u>JNPT charged ceiling tariff as applicable to respective categories for retail sale of electricity in its licence area, except for FAC, which was not charged....</u>” In this context, Petitioner to provide clarification for adopting different tariff rates for its consumers as under:<table><tr><th rowspan="2">Category (FY 2021-22)</th><th colspan="2">Fixed/Demand Charges</th><th colspan="2">Wheeling Charges (Rs/Unit)</th><th colspan="2">Energy Charges (Rs/Unit)</th></tr><tr><th>JNPT</th><th>MSEDCL</th><th>JNPT</th><th>MSEDCL</th><th>JNPT</th><th>MSEDCL</th></tr><tr><td>LT II A (0 to 20KW)</td><td>Rs. 415/month</td><td>Rs. 415/month</td><td>1.38</td><td>1.38</td><td>5.57</td><td>7.18</td></tr><tr><td>LT II B (&gt;20 KW)</td><td>Rs 415 /kVA/Month</td><td>Rs 415 /kVA/Month</td><td>1.38</td><td>1.38</td><td>5.57</td><td>10.79</td></tr></table></li></ul>	Category (FY 2021-22)	Fixed/Demand Charges		Wheeling Charges (Rs/Unit)		Energy Charges (Rs/Unit)		JNPT	MSEDCL	JNPT	MSEDCL	JNPT	MSEDCL	LT II A (0 to 20KW)	Rs. 415/month	Rs. 415/month	1.38	1.38	5.57	7.18	LT II B (>20 KW)	Rs 415 /kVA/Month	Rs 415 /kVA/Month	1.38	1.38	5.57	10.79	JNPT submits that as per Order of the Hon’ble Commission, it was allowed to levy ceiling tariff of MSEDCL. Accordingly, JNPT has levied the tariff considering the MSEDCL tariff as ceiling tariff and not exceeded the MSEDCL tariff for any tariff category.
Category (FY 2021-22)	Fixed/Demand Charges			Wheeling Charges (Rs/Unit)		Energy Charges (Rs/Unit)																								
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Sr No	Reference to the Petition	Description/Query							JNPT Reply
		and <=50 KW)							
		LT II C (>50KW)	Rs 415 /kVA/Month	Rs 415 /kVA/Month	1.38	1.38	5.57	12.95	
		HT I(A) Industrial	Rs 432/kVA/Month	Rs 432/kVA/Month	0.56	0.56	5.57	6.96	
		HT II Commercial	Rs 432/kVA/Month	Rs 432/kVA/Month	0.56	0.56	5.04	11.20	
		LTVII (B) (ii) LT Public Service – Others	Provide appropriate slab referring to MSEDCL's Tariff Schedule						
		LTV (ii) LT Industries	Rs 312/kVA/Month	Rs 312/kVA/Month	1.38	1.38	5.30	5.93	
		<b>Category (FY 2022-23)</b>	<b>Fixed/Demand Charges</b>		<b>Wheeling Charges (Rs/Unit)</b>		<b>Energy Charges (Rs/Unit)</b>		
			<b>JNPT</b>	<b>MSEDCL</b>	<b>JNPT</b>	<b>MSEDCL</b>	<b>JNPT</b>	<b>MSEDCL</b>	
		LT II A (0 to 20KW)	Rs. 415/month	Rs. 427/month	1.35	1.35	5.57	7.01	
		LT II B (>20 KW and <=50 KW)	Rs 415 /kVA/Month	Rs 427/kVA/Month	1.35	1.35	5.57	10.79	
		LT II C (>50KW)	Rs 415 /kVA/Month	Rs 427 /kVA/Month	1.35	1.35	5.57	12.76	
		HT I(A)	Rs	Rs	0.55	0.55	5.57	6.89	

Sr No	Reference to the Petition	Description/Query							JNPT Reply
		Industrial	432/kVA/Month	454/kVA/Month					
		HT II	Rs	Rs	0.55	0.55	5.04	10.95	
		Commercial	432/kVA/Month	454/kVA/Month					
		LTVII (B) (ii) LT Public Service – Others	Provide appropriate slab referring to MSEDCL’s Tariff Schedule						
		LTV(ii) LT Industries	Rs 312/kVA/Month	Rs 321/kVA/Month	1.35	1.35	5.30	6.05	
3.	Green Energy Tariff	<ul style="list-style-type: none"><li>Petitioner has not proposed Green Tariff for Consumers who opt for supply of RE power from Distribution Licensee. In this context, Petitioner to propose the methodology to levy Green Tariff and charges for the same.</li></ul>							It is submitted that there are only 17 consumers in the area of supply of JNPT SEZ. Further, till date no consumer has opted for Green Tariff. JNPT proposes to continue with existing 66 paise/unit which is approved by the Hon’ble Commission to be continued for FY 2023-24 and FY 2024-25.
4.	Form F 21	<ul style="list-style-type: none"><li>Petitioner should fill the Format F21, which is kept blank as per the enclosed Tariff Formats.</li></ul>							It is submitted that JNPT has claimed capitalisation of capex in proportion to the asset loading which is very miniscule as compared to total capex incurred by JNPT. Thus, Format F21 would not be the correct reflection of the actual assets capitalised and depreciation of the said

Sr No	Reference to the Petition	Description/Query	JNPT Reply
			assets.
<b>Data Gaps related to Tariff Philosophy</b>			
5.	Proposed Tariff Schedule	<ul style="list-style-type: none"> <li>Petitioner to provide clarification for the following deviations taken under the “Miscellaneous and General Charges” Chapter with respect to the prevailing Definition and conditions of the referred chapter provides under Case No. 322 of 2019, dated 31 March 2020:               <ol style="list-style-type: none"> <li>Why ‘Rebate for Incremental Consumption’ and “Rebate on Bulk Consumption’ to HT Industry consumers is not proposed?</li> <li>‘Penalty for exceeding Contract Demand’ proposed conditions are different from prevailing conditions.</li> <li>‘Consumer Security Deposit’ proposed conditions are different from prevailing conditions.</li> <li>‘Sanctioned Load’ definition is different.</li> </ol> </li> </ul>	<ol style="list-style-type: none"> <li>Considering the load profile of existing consumers, JNPT has not proposed any ‘Rebate for Incremental Consumption’ and “Rebate on Bulk Consumption’ as is the case with MSEDCL.</li> <li>The conditions proposed in respect of ‘Penalty for exceeding Contract Demand’ and ‘Consumer Security Deposit’ and definition of ‘Sanctioned Load’ are in accordance with the tariff order dated 21 July, 2022 in Case No 235 of 2020 for MADC.</li> </ol>
6.	Prepaid Meter Connection	<ul style="list-style-type: none"> <li>Petitioner to clarify whether any proposal or choice is given to its existing consumers for opting Prepaid Meter Connections.</li> </ul>	JNPT submits that it has not received any request for any Prepaid meter connection. As an when such request is received, JNPT may consider the same.
7.	ToD Tariff	<ul style="list-style-type: none"> <li>Petitioner should submit the detailed estimation of the ToD Rates for FY 2023-24 and FY 2024-25 based on the recommendations provided for EON SEZ under the “REPORT ON STUDY OF TIME OF DAY (TOD) TARIFF STRUCTURE IN ELECTRICITY TARIFF IN MAHARASHTRA” published</li> </ul>	It is submitted that load curve of JNPT as shown below clearly shows that there is less load during 22:00 Hrs to 6:00 Hrs and same needs to be incentivised to flatten the curve. Similarly, to

Sr No	Reference to the Petition	Description/Query	JNPT Reply
		in September 2022.	<p>reduce the peak demand by shifting the load to other time blocks, higher TOD rates are being proposed in the tariff. Further, the power purchased by JNPT is RTC power considering the availability of power and rate, it is necessary to flatten the curve to optimise the cost. Thus, considering the present load curve of JNPT, it has proposed to continue with the existing TOD rates which meets the objective of the having load curve without much variation. Further, the present load of JNPT is very less and as it increases in coming years and stabilises, JNPT will analyse and propose necessary changes in TOD slots in next MYT Petition.</p>

Load Curve of JNPT – Weekday of a Month from January 22 to December 22

