

the BESCOM

Preliminary observations on Application for Approval of APR for the FY17 and ARR for the FY19

I. Annual Performance Review for the FY17:

A. Sales -other than IP Sets:

The Commission in its Tariff Order 2016 dated 30.03.2016 had approved total sales to various consumer categories at 26472.74 MU as against the BESCOM's proposal (including additional sales) of 27540.36 MU. The actual sales of the BESCOM's, as per the current APR filing [D-2 FORMAT] are 26239.23 MU, indicating a shortfall in sales to an extent of 233.51 MU, as compared to the approved sales.

The category-wise sales approved by Commission and the actuals for the FY 17 are indicated in the table below:

Figures Million Units

Category	Approved in Tariff Order-2016	Actuals	Difference
LT-2a*	6617.58	6444.13	-173.45
LT-2b	43.12	46.30	3.18
LT-3	1942.44	1879.30	-63.14
LT-4b	2.88	2.04	-0.84
LT-4c	6.07	5.04	-1.03
LT-5	1203.65	1163.20	-40.45
LT-6	509.97	581.85	71.88
LT-6	370.38	387.47	17.09
LT-7	185.94	158.68	-27.26
HT-1	723.98	681.56	-42.42
HT-2a	4743.47	4456.17	-287.30
HT-2b	2834.01	2619.62	-214.39
HT-2c	240.28	270.05	29.77
HT-3a & b	77.60	15.07	-62.53
HT-4	104.50	106.41	1.91
HT-5	78.53	82.49	3.96
Sub total	19684.41	18899.38	-785.03
BJ/KJ	49.15	54.38	5.23
IP	6739.18	7285.47	546.29
Sub total	6788.33	7339.85	551.52
Grand total	26472.74	26239.23	-233.51

*Including BJ/KJ installations consuming more than 18 units/month

From the above table it is noted that the major categories contributing to the reduction in sales with respect to the approved estimates are LT2a-Domestic Category (173.45 MU), LT3-Commercial (63.14 MU), HT Industries (287.30 MU), HT Commercial (214.39 MU) and

HT3-Irrigation (62.53 MU). On the other hand, major categories contributing to the increase in sales with respect to the approved estimates are LT-6 Water supply (71.88 MU) and IP Sets (546.29 MU).

In the light of the above, the BESCO shall:

- a) analyze the reasons for decrease in sales to LT-2a Category in view of the fact that the Commission has approved 7076928 installations under LT-2a Category, excluding BJ/KJ installations consuming more than 18 units/month with corresponding sales at 6537.48 MU. Even though the number of installations has increased by 75915 numbers, the sales have decreased by 167.79 MU.
- b) also analyze the reasons for reduction in sales to HT categories. In this regard the BESCO shall furnish the data of sales to HT2(a), HT2(b) and HT 2(c) categories along with the consumption from open access / wheeling for the years 2014-15, 2015-16 & 2016-17 in the following format:

HT2A

Year 2014-15	Sales by the BESCO	Energy procured by HT Consumers under open access / wheeling	Total of the BESCO Sales & OA/Wheeling consumption	% share of OA energy to Total energy
2015-16				
2016-17				

HT2B

Year 2014-15	Sales by the BESCO	Energy procured by HT Consumers under open access / wheeling	Total of the BESCO Sales & OA/Wheeling consumption	% share of OA energy to Total energy
2015-16				
2016-17				

HT2C

Year 2014-15	Sales by the BESCO	Energy procured by HT Consumers under open access / wheeling	Total of the BESCO Sales & OA/Wheeling consumption	% share of OA energy to Total energy
2015-16				
2016-17				

- c) confirm as to whether, the category-wise sales indicated in D-2 Format are excluding the unbilled sales. If unbilled sales are included, category-wise break up of unbilled sales shall also be furnished.

B. Sales to IP sets

- i. It is observed that, the overall sales have increased by 546.29 MU (8.1%) totaling to 7285.47 MU as against the approved sales of 6739.18 MU as per the Tariff Order dated 30th March, 2016 for the FY17. Further, the Commission had approved specific consumption of IP-sets as 8037 units / installation / annum for the FY17. However, as per the consumption reported in D2 Format of the filing, the specific consumption works out to 8,829 units / installation/annum for the FY17. This indicates a huge increase of 792 units / installation/annum in specific consumption. This increase in specific consumption of 792 units / installation/annum (10%) has resulted in a substantial increase in sales to an extent of 546.29 MU which needs to be explained by the BESCOM. **Also, the actual sales reported for the FY17 is 26% higher than the sales reported for the FY16 (sales for the FY16 was 5777.77 MU).**

Further, the actual number of installations for the FY17 has decreased by 12,291, as compared to the approved number of installations of 8,53,519.

The BESCOM shall furnish the reasons for increase in specific consumption and total consumption as compared to the approved figures despite reduction in the number of installations by 12291.

- ii. In Table No 4.2 in page No 60 in 5th column it is wrongly mentioned as, "up to 30.09.2018", whereas it should have been indicated as "up to 30.09.2017" and the number of IP sets shown as 854809. Further, under Sl. No.5, LT4 (a)(i), in the last column, the growth rate is given as 4%, whereas the same works out to 1.7%. The BESCOM shall clarify the same.
- iii. During the KPTCL and the ESCOMs' Review Meeting held on 25.10.2017, the BESCOM has submitted that, of the total 791402 IP-sets for, which the GPS survey was completed, 132311 IP-Sets have been declared as not-in-use/dried-up, installations. Almost, the same number was declared as not-in-use/dried up installations, during the previous year also. That means 132311 number of installations shall have to be deducted from the total number of installations indicated in D2, Format for the FY17 (from April 2016 to March 2017). **Accordingly, month-wise and total IP-set consumption needs to revised.**

Therefore, the BESCO shall submit the revised consumption based on the revised number of installations for the FY17, taking into account the GPS survey data.

- iv. The Commission in its Tariff Order dated 30th March, 2016 had directed the BESCO to furnish feeder-wise IP-set-consumption based on feeder-energy meter data by deducting the actual energy losses prevailing in 11kV line, distribution transformers and LT line, every month in respect of agriculture feeders segregated under the NJY. During the KPTCL & the ESCOMs' Review Meeting held on 25.10.2017, the BESCO has submitted the consolidated consumption for the FY17 without indicating feeder-wise/subdivision-wise details, as per the prescribed formats. Therefore, the BESCO is required to revise the IP consumption for the FY17, as per the energy recorded on the segregated feeders clearly indicating the energy input to the feeders on the basis of energy-meters reading data **(final reading minus initial reading multiplied by the constant)**.

The BESCO shall furnish month-wise data in support of its claims of IP-consumption for the FY17 duly considering the above issues, as per the format given in the subsequent paras.

C. Distribution Loss:

The actual distribution loss reported by the BESCO for the FY17 is 13.19%, as against 13.00% approved by the Commission in its Tariff Order dated 30th March, 2016. Considering the actual losses of 12.03% as reported by the BESCO, as per the audited accounts for the FY16, there is an increase in the distribution loss by 1.16% in the FY17. As discussed in the observations on sales to IP-Sets, the Commission notes that, while there is an increase in IP-Set-consumption there is a decrease in the metered sales. Since the IP-Set-sales is not backed up by the consumption figures on the basis of segregated feeder-wise data under the NJY, the Commission is unable to accept the distribution-loss-figures claimed by the BESCO. Hence, the feeder-wise number of IP-sets along with consumption figures, based on segregated-feeders besides Division-wise data of numbers and consumption of IP-sets, as per DCB, shall be furnished along with the connected load.

The Commission, in its Order dated 30th March, 2016, had fixed the distribution loss at 12.75% for the FY18. The BESCO, having reported distribution-loss of

13.19% for the FY17, shall to furnish its present status of distribution loss achieved in the FY18 as at the end of November, 2017.

Considering the substantial capital investment incurred in the recent past and distribution loss levels achieved in the FY16 and the FY17, the BESCO is required to reassess the distribution losses for the FY19.

Further, the BESCO, shall furnish the data of Energy Audit for Town and Cities in the following format, considering the annual energy sale and input energy at the feeder levels:

Name of the Town/City	the FY17			the FY18 (Cumulative as at the end of Nov, 2017)		
	Energy Input in MU	Energy Sold in MU	% Distribution Losses	Energy Input in MU	Energy Sold in MU	% Distribution Losses
TOTAL						

D. Power purchase:

1. The D1 Format which was not submitted along with the filing was obtained through e-mail. The costs indicated did not contain the break-up of fixed cost and the variable cost. Hence, a signed copy in the Commission prescribed D1-Format for the FY 17 and the FY 18 may be furnished, along with the breakup of fixed and the variable charges, in respect of all the sources of power having two-part tariff.
2. The BESCO has considered 29.60 MU and Rs. 11.19 Crores as inter-ESCOMs energy charges, as indicated in D1-Format. The reconciled energy-balancing statement signed by all the ESCOMs shall be furnished.
3. The BESCO has indicated an amount of Rs.98.38 Crores and Rs. (-)398.50 Crores in D1-Format, towards Prior period debit/credit. The BESCO shall furnish a detailed explanation for these amounts.
4. In respect of BTPS Unit-2 & RTPS Unit-8 TPS, the tariff indicated in the D1 Format is higher than the Commission approved tariff. The BESCO shall furnish the reasons thereof.

E. RPO Compliance:

1. The BESCOM has furnished the details of compliance of solar and non-solar RPO for the 2016-17. The BESCOM shall confirm whether the RPO compliance, as indicated, is in accordance with the Government Order No. EN 43 PSR 2017 dated 26.09.2017 and if not, shall give reasons for deviation from the GO. For validating the RPO compliance and to work out the APPC, the BESCOM shall furnish the data as per the format indicated below duly reconciling the data with the audited accounts:

i. Non-solar RPO:

No.	Particulars	Quantum in MU	Cost-Rs. Crs.
1	Total Power Purchase quantum from all sources		
2	Non-solar Renewable energy purchased under PPA route at Generic tariff including Non-solar RE purchased from KPCL		
3	Non-solar Short-Term purchase from RE sources, excluding sec-11 purchase		
4	Non-solar Short-Term purchase from RE sources under Section-11		
5	Non-solar RE purchased at APPC		
6	Non-solar RE pertaining to green energy sold to consumers under green tariff		
7	Non-solar RE purchased from other ESCOMs		
8	Non-solar RE sold to other ESCOMs		
9	Non-solar RE purchased from any other source like banked energy purchased at 85% of Generic tariff		
10	Total Non-Solar RE Energy Purchased [No 2+ No.3+No.4+No.5 +No.7+No.9]		
11	Non-Solar RE accounted for the purpose of RPO [No.10- No.5-No.6-No.8]		
12	Non-solar RPO complied in % [No11/No1]*100		

ii. Solar RPO:

No.	Particulars	Quantum in MU	Cost-Rs. Crs.
1	Total Power Purchase quantum from all sources		
2	Solar energy purchased under PPA route at Generic tariff including solar energy purchased from KPCL		
3	Solar energy purchased under Short-Term, excluding Section-11 purchase		
4	Solar Short-Term purchase from RE under Section-11		
5	Solar energy purchased under APPC		
6	Solar energy pertaining to green energy sold to consumers under green tariff		

7	Solar energy purchased from other ESCOMs		
8	Solar energy sold to other ESCOMs		
9	Solar energy purchased from NTPC (or others) as bundled power		
10	Solar energy purchased from any other source like banked energy purchased at 85% of Generic tariff		
11	Total Solar Energy Purchased [No.2+ No.3+No.4+No.5+No.7+No.9+No.10]		
12	Solar energy accounted for the purpose of RPO [No.11- No.5-No.6-No.8]		
13	Solar RPO complied in % [No12/No.1]*100		

F. Capital Expenditure for the FY17:

- i) In the Tariff Order dated 30th March, 2016, the Commission had approved Rs.**1529.41 Crores** towards capex for the FY17. Subsequently, the BESCOM had approached the Commission for approval of revised capex of Rs.**3251.48** Crores, stating that, it is taking up many GoI and GoK initiated works. The Commission, after examining the proposal had approved a revised capex of Rs.**2000** Crores for the FY17.

Now, the BESCOM has indicated a capital expenditure of Rs.**1402.25** Crores in table on page No.14, whereas in format D17, the capital expenditure is shown as Rs.1615.92 Crores. the BESCOM shall explain the reasons for the difference in capex figures:

Capital expenditure of the BESCOM for the FY17

Amount in Rs. Crores

Heads of works	Approved by KERC on 23/11/2016	Actual Expenditure
Ganga kalyana Works		83.34
Service connection works	264.6	59.98
Water Works		38.50
Providing Infra. to General IP Set		0.66
11 KV Evacuation line	68.10	46.97
Providing Additional DTC's /Enhancement of DTCs	39.40	27.17
Reconductoring of HT lines in No.s/Circuit kms	21.03	14.50
Reconductoring of LT lines in No.s/circuit kms	25.29	17.44
SDP Progress	-	14.00
Strengthening of HT/LT network including OH/UG cable and AB cable	51.52	35.53
Local planning	156.59	107.99
Safety works	19.23	13.26
Emergency / Calamity Works	1.91	1.32
Meters	20.22	6.05
Providing Infrastructure to Un authorised IP sets	260.26	179.49
NJY	453.83	312.98
HVDS	213.15	147.00
RGGVY 12th plan	25.85	17.83
RAPDRP B	15.00	4.25

RAPDRP A	60.99	42.06
DAS	135.08	93.16
SG	0.82	0.57
DSM	17.06	11.77
DDUGJY	-	0.00
IPDS	-	0.00
One time maintenance	91.15	82.78
Civil Engineering Works	48.91	33.73
IT initiative	10.00	9.92
TIC	-	0.00
Replacement of existing conventional Tc. by Amorphous Core Tc. In South Circle	-	0.00
Corporate office reserve fund	-	0.00
Grand Total	2000.00	1402.25

The amount of assets, categorized for the FY17, has been shown in format-D17 & D15 as Rs.1763.27 Crores. The capital expenditure, categorized/ capitalized (gross fixed assets) towards plant & machinery and lines & Cables is indicated as Rs.1691.59 Crores.

Though, the BESCO had sought a huge capex of Rs.3251.48 Crores for, the FY17, it has incurred a capex of only Rs.1402.24 Crores for the FY17, which is less than the originally approved capex of Rs.1529.41 Crores. This shows that, the BESCO is not planning its capex, as per the Capital expenditure guidelines issued by the Commission. The reasons for the same shall to be furnished.

- ii) Further, on examining the above table, it is noted that, the BESCO has spent Rs.14 Crores for '**SDP**', for which, the BESCO had not indicated any capex during the MYT tariff filing. The BESCO shall explain the type of the works it had taken up and the reasons for taking up these works without indicating in the capex proposals.

It is to be noted here that, the BESCO has not achieved the capex in respect of Extension & improvement works (E & I), as proposed, which would have helped the BESCO to reduce distribution-losses and improve the reliability of Distribution system. During the FY16, the BESCO had achieved less than 50% of the capex proposed under E & I works and during the FY17, it has not achieved capex beyond 70%. When the BESCO is not able to achieve the level of capex approved by the Commission, the reasons/justification for approval of higher capex targets year on year, should be explained by the BESCO.

In case of **TIC** (Technological Innovation Centre) **works**, the BESCO has stated that, out of Rs.10 Crores, it had achieved a capex of Rs.9.92 Crores. The BESCO shall explain the type of works taken up in TIC and the benefits achieved vis-à-vis the envisaged benefits.

- iii) The BESCOM needs to confirm as to whether, it had recovered an amount of Rs.44.30 Crores from the **BBMP towards Tender Sure** Works, which were stated to have been incurred during the FY16. The Commission had cautioned the BESCOM in the Tariff Order dated 11th April, 2017 that, the amount is liable for disallowance if, it is not recovered from the BBMP since the Tender Sure work is a deposit contribution work in nature and needs to be paid by the BBMP. Further, if any amount has been incurred during the FY17 for Tender Sure Works, the BESCOM needs to furnish the breakup of Tender Sure works and the details of amount collected from BBMP.
- iv) The BESCOM shall furnish the details of sources of funding (like grants, debt, equity and internal sources) for the categories of capex incurred during the FY17, against each category of works.
- v) The BESCOM is required to furnish the details of expenditure incurred if any, for the Surya Raitha Scheme under DSM during the FY17 and the details of loans drawn, as envisaged in the scheme.

II. Annual Revenue Requirement of the FY19:

A. Sales -other than to IP-Sets:

1. The BESCOM in its filing has stated that the number of installations for the FY19 has been worked out on the basis of:
 - a. Estimation of the number of consumers for the FY18 by adding the half yearly growth of consumers to the first half year data of the FY18 and
 - b. Applying one-year Growth of the FY17 over the FY16 on the FY-18 revised estimates with following deviations:
 - For IP sets i.e., LT4a, 26070 unauthorized IP installations are planned to be serviced in 5 months of the second half i.e., H2 of the FY18 along with Rural Electrification of IP of 7000. For the FY19, 15000 installations are added under Rural Electrification of IP-sets.
 - Under DDUJY, 59830 no. of installations are to be serviced under the FY18 (already 23624 installations are serviced). Hence, 36206 installations are considered for H2 of the FY18. For the FY19, 59829 no. of installations are considered.
 - Wherever, one-year growth rate for the FY17 is negative or exorbitant, certain alterations are done, such as
 - For LT2b, one-year growth rate is -0.2%, the FY18 numbers are retained for the FY19.
 - For LT4c, one-year growth rate is -50.7%, installations added during the FY18 is

added to year end installations of the FY18 for estimating the installations for the FY19.

- For LT7, one-year growth rate is 14.5%. Since, the percentage growth varies under this category only 10% growth rate over the FY18 is considered for the FY19.
- For, HT5, one-year growth rate is 59.8%, which is exorbitant. Hence, 25% growth rate over the FY18 is considered for the FY19.

2. Further, the BESCO has stated that, the FY19 the sales estimate is computed as under:

a. The estimation for the FY18 is computed, adding the Sales for Second Half of the FY 18 i.e. H2 of the FY-18(which is projected considering the H2 ratio for the FY17) to the actuals sales up to September,2018, and

b. The FY-19 sales are computed based on one-year Growth Rate with following modifications:

- Wherever there is a negative growth the sales of the FY18 is retained, as in the LT4b.
- For LT6 water supply installations, one-year growth rate is 43.8% and CAGR, as per formula is 22.5%. Since, 43.8% is on the higher side, growth rate as per CAGR formula i.e. 22.5% is considered.
- For LT7 water supply installations, one-year growth rate is -5.3% and CAGR as per formula is 2.6%. Since, -5.3% is on the negative side, the growth rate as per CAGR formula i.e. 2.6% is considered.
- Sale to IP set is computed by multiplying the average consumption of 7980 Units/IP/annum for the FY18 with the end year installations figure of the FY 19.
- Sale to BJ/KJ is computed by multiplying the average consumption of the FY18 with the end year installations figure of the FY-19, a part of the sales is considered under LT2a category.

3. The observations of the Commission on the sales forecast for the FY19 are as follows

- LT(1) – BJ/KJ category: The BESCO has not indicated the breakup of installations consuming upto 40 units/month and more than 40 units/month under this category. Hence, the BESCO, shall furnish the breakup of installations consuming less than or equal to 40 units/month and above 40 units/month for the 2017-18 and estimates for the FY19 in the following format:

Particulars	No. of Installations	Consumption in MU
Installations Consuming up to 40 Units.		
Installations consuming more than 40 units and build under LT 2a.		

- ii. In the case of HT4, the number of installations as on 30.09.2017 is higher, compared to estimated figures as on 31.03.2018. In this context, the BESCOM shall explain the reasons for reduction in number of installations as on 31.03.2018.
- iii. In the case of LT2 (b)(ii), even though the number of installations for the FY19 is retained at the FY18 level, the sales for the FY19 is not retained at the FY18 level. Also, for LT 4(b), though the number of installations has been increased in the FY19 with respect to the FY18, sales have been retained at the FY18 level. Reasons for the same shall be furnished.
- iv. For HT-1category, though the number of installations has been increased for the FY18, the sales are retained at the FY17 level. For HT-2a, though there is increase in the number of installations for the FY18 & the FY19, the sales are retained at the FY17 level. For HT 2b(i), though the number of installations for the FY19 is reduced when compared to the FY18, increased sales have been shown. In the case of HT-3(a)(i), though the number of installations in the FY18 has increased, the sales are retained at the FY17 level for the FY18 and reduced for the FY19. In the case of HT-4(a), though the number of installations has decreased, the sales have been increased in the FY19. Reasons for the same shall be explained.
- v. One-year growth rate considered for estimating the no. of installations, would not capture the underlying trend. Therefore, the BESCOM may reconsider adopting CAGR based on three to five years' data for estimating the number of installations and sales.
- vi. The table indicating the growth rates for the no. of installations is furnished, as under:

Category	Percentage Growth Rates			
	2011-12 to 2016-17 CAGR	2013-14 to 2016-17 CAGR	the FY17 growth over the FY16	Growth rate proposed by the BESCOM for the FY19
LT-2a	6	6	6	6
LT-2b	-2	5	9	9
LT-3	6	6	7	7
LT-5	5	5	1	1
LT-6 WS	9	9	44	23
LT-6 SL	4	4	6	6
HT-1	9	8	1	1
HT-2 (a)	8	8	-3	0
HT-2 (b)	7	7	0.18	0
HT-2 (c)	-	30	16.14	16
HT-3(a)& (b)	9	18	-74	-57
HT-4	3	5	10	10

It is noted that the growth rates considered for LT-2b, LT-6 WS and HT-4, is higher compared to the normal growth rates as per the CAGR and is lower for LT-5. HT-1, HT-2a, HT-2b and HT-3. The BESCO shall consider revising the above, as one-year growth rate would not capture the underlying trend.

vii. The table indicating the growth rates for the energy sales is furnished below:

Category	Percentage Growth Rates			
	2011-12 to 2016-17 CAGR	2013-14 to 2016-17 CAGR	the FY17 growth over the FY16	Growth rate proposed by the BESCO
LT-2a	7	7	6	6
LT-2b	2	8	9	9
LT-3	7	7	7	7
LT-5	2	2	1	1
LT-6 WS	5	8	44	23
LT-6 SL	-1	-1	6	6
HT-1	7	4	1	1
HT-2 (a)	0	-4	-3	0
HT-2 (b)	0	-3	0	0
HT-2(c)	-	44	16	16
HT-3(a)& (b)	19	18	-74	-57
HT-4	-2	-1	10	10

It is noted that the growth rates considered for LT-6 WS &SL and HT-4, are higher as compared to the normal growth rates as per the CAGR and are lower in respect of HT-1 and HT-3 installations. the BESCO shall consider revising the above, as one-year growth rate would not capture the underlying trend.

For HT2(a) category, the sales estimate based on the analysis of open access impact shall be considered. The BESCO should have computed the growth rates considering the total energy sold to this category including OA/wheeling and should have estimated the sales for the FY19, considering the ratio of energy sold by the BESCO in the FY17 to the total sales of the FY17 including OA/wheeling sales. The BESCO may compute HT-2a sales on the above method and furnish the data.

4. To validate the sales, category-wise information in the following format shall be furnished:

a. No. of Installations:

Category	2015-16 Actuals		2016-17 Actuals		2017-18	
	As on 30 th Nov, 2015	As on 31 st March 2016	As on 30 th Nov, 2016	As on 31 st March 2017	As on 30 th Nov, 2017	As on 31 st March, 2018 (Estimate)
LT-2a						
LT-2b						
LT-3						
LT-4 (b)						
LT-4 (c)						
LT-5						
LT-6						
LT-6						
LT-7						
HT-1						
HT-2 (a)						
HT-2 (b)						
HT2C						
HT-3(a)& (b)						
HT-4						
HT-5						
Sub Total (Other than BJ/KJ and IP)						
BJ/KJ						
IP						
Sub Total (BJ/KJ and IP)						
Grand Total						

b. Energy Sales

Category	2015-16 Actuals		2016-17 Actuals		2017-18	
	1 st April, 2015 to 30 th Nov, 2015 (cumulative)	1 st Dec, 2015 to 31 st March, 2016 (cumulative)	1 st April, 2016 to 30 th Nov, 2016 (cumulative)	1 st Dec, 2016 to 31 st March, 2017 (cumulative)	1 st April, 2017 to 30 th Nov, 2017 (cumulative actuals)	1 st Dec, 2017 to 31 st March, 2018 (cumulative Estimate)
LT-2a						
LT-2b						
LT-3						
LT-4 (b)						
LT-4 (c)						
LT-5						
LT-6						
LT-6						

LT-7						
HT-1						
HT-2 (a)						
HT-2 (b)						
HT2C						
HT-3(a)&						
HT-4						
HT-5						
Sub Total (Other than BJ/KJ and IP)						
BJ/KJ						
IP						
Sub Total (BJ/KJ and IP)						
Grand						

5. The BESCOM shall furnish the estimates for complying with solar and non-solar RPO for the 2018-19, including cost implication, if any, for purchasing the RECs. In this regard the BESCOM shall furnish the following details pertaining to the BESCOM duly tallying with the renewable energy purchase estimates made for the FY19:

Source	Capacity under PPA in MW as on 30.11.2017	Anticipated MW capacity addition under PPA during the remaining period of the FY18	Anticipated capacity addition under PPA during the FY19
Wind			
Mini-hydel			
Co-generation			
Biomass			
Waste to Energy			
Solar			

a. Wheeling Charges for the FY19:

The BESCOM has proposed wheeling charges of 20.88 paise/ unit, and 48.72 paise/unit respectively for HT network and LT network. Further it is stated that proposed technical losses are applicable, which are not furnished. **Therefore, the BESCOM shall furnish the applicable technical losses for OA/wheeling transactions.**

The BESCOM has stated that wheeling charges proposed shall be applicable to all OA/wheeling transactions. At present, for RE-sources there is concessional wheeling charges, **the BESCOM shall clarify whether the existing concessional wheeling charges shall be continued for RE sources. If, not the BESCOM's proposal in the matter, may be submitted.**

b. Cross subsidy surcharge:

The BESCO has stated that the Cross Subsidy Surcharge (CSS) calculated by the Commission and recovered from Open Access consumers is often insufficient to recover the entire loss of cross subsidy. It is stated that, the recovery of CSS is adversely affected due to the Commission considering a lower power purchase cost. That in addition, no cross subsidy surcharge is applicable to open access/wheeling transactions from solar energy to encourage renewable energy. Solar generation has increased significantly since last year, the BESCO has prayed the Commission to levy CSS on wheeling transactions of solar energy also. The BESCO has also stated that power purchase cost is getting stranded due to consumers procuring power under OA.

The Commission notes that the retail tariff, cross subsidies, wheeling charges and CSS are based on estimates and while truing up, the differences, if any, are carried forward to the ARR of the next year and accordingly, the retail tariff, cross subsidies, wheeling charges and CSS are revised.

Regarding introduction of wheeling charges and CSS for solar, the same would be dealt with separately by the Commission.

Regarding stranded cost, the matter of levy of additional surcharge is before the Commission in a separate petition filed by ESCOMs and therefore, the same cannot be entertained in this petition.

6. For the FY19, the BESCO has proposed the following CSS stating that the same is computed based on Tariff Policy, 2016:

Voltage level	HT-2a	HT-2b	HT-2C	HT-4	HT-5
66kV & above	169	213	189	146	257
HT-11kV or 33 kV	169	213	189	146	257

The Commission notes as per the calculations submitted by the BESCO, CSS has to be levied on HT-1 category also at 66 kV and above level which is not proposed by the BESCO. The BESCO shall make its stand clear, in the matter.

B. Projection of sales to IP Sets for the FY19:

1. The Commission, in its Tariff Order dated 30th March, 2016, had directed the BESCO to furnish the monthly consumption of IP-sets, based on the readings from the energy Meters provided to 11kV agricultural feeders at the substations, duly deducting actual energy

losses prevailing in 11 kV line, transformers and LT distribution system and other consumption, if any. But, the BESCO has not furnished the month-wise IP-set consumption as directed. However, the BESCO, in its data submitted to the Commission for the KPTCL & the ESCOMs Review Meeting held on 25.10.2017, had shown the total IP consumption, as 1716.03 MU for April-June 2017 without furnishing the month-wise details as per the prescribed formats, in support of its claim.

Therefore, the BESCO shall submit the month-wise consumption of all the agriculture feeders segregated under NJY Scheme for the FY17 and also for the FY 18 (from April to November 2017) in the following format, **clearly indicating the energy input to the feeders, on the basis of energy meters reading data (initial reading-final reading* constant).**

Month	Name of Sub-division	Name of Segregated Agriculture Feeders in the subdivision	Initial energy meter reading in the feeder	Final energy meter reading in the feeder	Meter constant	Monthly Consumption in MU as recorded in all the agricultural feeders at the substations pertaining to the Sub division	Distribution loss(11kV line, DTCs & LT line) plus sales to other consumers if any, in MU (losses in all the agri. feeders only to be considered)	Net consumption duly deducting the Distribution loss (11kV & LT) & any other loads if any	No. of IP sets (total-dried up) connected to the agri. feeders in the subdivision			Average consumption of IP /month (specific cons in units /IP/month)	Total no of IP sets in the subdivision (as per DCB)			Total sales of IP sets in MU
									Beginning of the month	Serviced at the end of month	Mid- month		Beginning of the month	Serviced at the end of month	Mid- month	
1	2	3	3a	3b	3c	4 = (3b-3a) *3c	5	6=(4-5)	7a	7b	7c= (7a+7b)/2	8=6/7c	9a	9b	9c=(9a+9b)/2	10=8*9c
April 2016	Subdiv-1 Subdiv-2															
Total																
April 2017 To Nov-17	Subdiv-1															

Note:

- (1) If the agriculture feeders are not yet segregated under NJY in any sub-division, then the specific consumption of the division / circle / zone / company (where NJY is taken up) shall be considered to compute the IP consumption of such sub-division.
 - (2) No. of dried up IP-set installations shall be deducted from the accounts, while arriving at the month-wise and subdivision-wise specific consumption and total sales.
2. As per Format D2, the BESCO has projected a specific consumption of IP sets for the FY19 as 8,047 units/installation /annum, whereas the approved specific consumption for the FY19 in the Tariff Order dated 30th March, 2016 was 8,037 units/installation /annum. **Therefore, the**

BESCOM is required to furnish the rationale for projecting IP consumption based on slightly higher specific consumption as mentioned above for, the FY19.

During the KPTCL & the ESCOMs' Review Meeting held on 25.10.2017, the BESCOM was directed to complete enumeration of IP sets by November, 2017, to identify defunct/dried up wells in the field and take further necessary action to arrive at correct number of IP-sets in its jurisdiction on the basis of enumeration report. The BESCOM has not furnished compliance on this. The BESCOM shall furnish compliance in the matter, in order to arrive at the correct number of live IP Set installations & consumption and for projecting correct number of installations/consumption for the FY19. In the same Review meeting, the BESCOM had submitted that out of 791402 number of IP sets (for which GPS survey completed), 132311 have been declared as not-in-use/dried up installations. This means 132311 number of installations or the latest total number of identified dried up installations shall have to be deducted from its account from the number of installations, it has shown in D2 format for the FY19 (from April, 2017 to November 2017).

Accordingly, month-wise/ total IP consumption and specific consumption should have to be revised. The BESCOM shall submit the revised consumption based on the revised number of installations for the FY19 taking into account GPS survey data. In the absence of submission of GPS based survey report of actual number of live IP sets, the Commission will not consider the revised IP consumption for the FY19 as proposed by the BESCOM.

C. Distribution Losses:

In view of the observations regarding the revision of IP Set consumption, considering the GPS survey data, the Distribution loss level, has to be re-worked.

D. Power Purchase:

1. The quantum and cost of solar energy for the FY19 has been arrived at by considering the solar capacity for the FY17. The BESCOM is required to consider the solar capacity commissioned as up to the end of November, 2017, and the solar capacity likely to be commissioned up to 31.03.2019 and revise the projected solar energy for the FY19. The following data shall be furnished:

Type of Solar Plant	Capacity in MWp	Estimated Energy and cost contribution for the FY17		Estimated Energy and cost contribution for the FY18		Approved by the Commission Yes/No
		Qty (MU)	Cost(RS Cr)	Qty(MU)	Cost(RS Cr)	
1-3 MW Projects allotted to Farmers by KREDL.						
1150 MW Projects Taluk wise issued by KREDL.						
970MW Projects entered PSA with SECI						

Solar Park						
Others MW projects through competitive biddings						
S RTPV projects: i) 500KW & Above ii) Less than 500KW						

2. In the case of Renewable Energy (excluding Solar), the BESCOM has reported that it has considered the actual generation data of the FY17 and the projects likely to be commissioned up to 31.03.2019, for projecting the power purchase for the FY19. the BESCOM is required to consider the latest actual available data of the FY18 (till the end of November, 2017) for projecting the power purchase for the FY19.
3. The BESCOM shall furnish an abstract of month-wise, source-wise energy requirement projected for the FY19 duly tallying with the D1-Format.
4. the BESCOM shall explain the basis of tariff considered for BTPS Unit-III.

E. Capital Expenditure for the FY19:

The BESCOM has proposed a capex of Rs.2836.44 Crores for the FY19 against Rs.713.18 Crores approved in the MYT order dated 30th March, 2016, which is more than four times the capex approved in the MYT Order.

The BESCOM has not furnished the details of capex category as per the table of categories-wise works approved in the MYT order. The BESCOM needs to furnish the revised capex proposal in the following format and add any new category at the bottom of the table as a separate item.

Capital expenditure for the FY19

Amount in Rs. Crores

Sl No	Particulars	Approved in MYT the FY - 19	the BESCOM's revised Proposal For the FY19	Difference/additions
1	11 KV Evacuation & Link Lines	78.06		
2	Safety and Strengthening of HT/LT network including OH/UG cable and AB cable works	43.15		
3	HT Reconductoring	30.87		
4	LT Reconductoring	26.71		
5	Providing Additional DTC's/Enhancement of DTC's	44.8		
6	Planned works (RE / SCP / TSP/Drinking Water Ganga Kalyana and service connection)	45.48		
7	Local Planning	34.91		
8	RMU Works	3.827		

3	IPDS								
4	NJY								
5	HVDS								
	Any other works								

Cost of Balance works	Scheduled /targeted date of completion	Actual date of completion of work	Delay if any	Whether the grant has been converted to Loan due to delay	Amount of loan converted to loan	Interest on the converted grant into loan	Reason for the Delay
10	11	12	13	14	15	16	17

The BESCOM shall furnish the status/stages of progress of implementation of the time bound programme such as **DDUGJY and IPDS taken up by it during the FY18 and the works that are likely to spill over to the FY19.**

- v) The BESCOM needs to clearly segregate the amount required for meeting the spill over works and the new capex works for the FY19. Also, the BESCOM should analyze and re-examine its capex requirement at Rs.2836.44 Crores in view of its poor performance in the FY18 (till September, 2017). The BESCOM should furnish category-wise actual expenditure up to November, 2017 and the likely expenditure it is going to incur till March, 2018.

F. Observations on Expenses & Revenue:

- i. The source and application of fund (Asset and Liabilities) under Format-A2 are not tallied for the FY17 to the FY19. The figures in Format A1 are not tallied with the audited accounts submitted for the FY17. The corrected Balance Sheet in Format A2 and the Cash Flow Statement under A3 shall be submitted for the FY17 to the FY19.
- ii. In Format D6 (a), the same number for employees sanctioned and working is indicated for the FY17, the FY18 & the FY19. This shows that, no addition of employees has been considered based on recruitment and retirement of employees on superannuation. However, it is observed that the BESCOM has recruited considerable number of employees during the FY17 and the FY18. The BESCOM shall indicate the details of cadre-wise employee strength duly considering the retirement, and recruitment along with cost for the period the FY16 to the FY18.

- iii. Details of subsidy claimed submitted to GoK and subsidy received for the year the FY17 in respect of IP sets and BJ/KJ installations needs to be furnished along with the details of energy sales. The BESCOM, shall indicate whether it has received any subsidy pertaining to the past periods during the FY17 and if so, the details of the amount received shall be furnished separately.
- iv. Details of the bank / Financial Institution-wise long-term and short-term loans, inclusive of overdraft availed, during the FY18 (up to November, 2017) along with rate of interest and amount of interest, term of loan, fresh borrowings, repayment and the purpose of loan availed during the period shall be furnished.
- v. The BESCOM shall furnish the details in respect of the following items indicated under A&G expenses for the FY17:
- | | |
|--------------------------------------------------|--------------------|
| i) Remuneration to contract agencies | - Rs.113.64 Crores |
| ii) Conveyance & Travel expenses | - Rs. 45.19 Crores |
| iii) Legal, Professional and consultancy charges | - Rs. 4.22 Crores |
- vi. The BESCOM, under Format D6 has projected an amount of Rs.174.93 Crores as expenditure towards terminal benefits for the FY19. The BESCOM is required to furnish the basis and computations for claiming this amount along with relevant actuarial valuation report.
- vii. The BESCOM, under Format D8 has considered an amount of Rs.162.23 Crores for the FY19 as depreciation on assets created out of consumer contribution/ grants. The BESCOM is required to furnish the computations for claiming this amount.
- viii. The BESCOM has considered an additional equity infusion of Rs.200 Crores each for the FY18 and the FY19 from GOK. The BESCOM shall furnish the copy of the commitment letter from GOK, besides furnishing the actual amount of additional equity received during the FY18 so far, along with the copy of the relevant Government Order.
- ix. In the case of LT4 (a)(i) – IP Sets up to 10 HP, the average sanctioned load is considered as 9.5 HP per installation even in the present filing also. The reason for considering uniform load of 9.5 HP for all IP sets shall be explained along with furnishing Division-wise breakup of existing number of IP sets, average connected load and estimated consumption.
- x. There is a discrepancy in the connected loads indicated in Form D21 under LT 2(a) (ii), 2(b) (i), 3 (i) & (ii) 4(b) 5 (a) (b) (40HP & above and up to 67 HP and above 67 HP Category)

shall be corrected by submitting the duly certified with Circle wise and consolidated data.

- xi. The category-wise slab-wise consumption indicated in Form D21 shall be justified with Division wise details of computation.
- xii. The BESCO in its filing has proposed uniform increase of energy charges at 83 paise/unit for all category of consumers without proposing any increase towards fixed/demand charges. The BESCO in its filing has stated that the fixed expenditure to the extent of 11% only are being recovered in the form of demand charges from HT consumers. In spite of the observation made in the filing, the BESCO has not proposed any increase in fixed/demand charges for consumers other than consumers with a contract demand of 1MW and above. This needs to be clarified.

xiii. Regulatory Asset:

The BESCO in its application filed for the approval of APR for the FY 17 has claimed an amount of Rs.581.30 Crores as Regulatory Assets and Rs.68.41 Crores as carrying cost. The Commission, as already clarified in para 5.3 of the Tariff Order dated 30.03.2016, that the net amount of Rs.541.97 Crores as Regulatory Assets and included it in the ARR of the FY17 to be recovered from the consumers in the retail supply tariff. The net amount of Regulatory Assets is arrived by taking the Regulatory Assets, as per the Commission's Order dated 12.05.2014, Gap in revenue on the APR of the FY 14, the Gap in revenue as per the ARR for the FY16 and the allowance of additional revenue by revision of tariff. The Commission, by including the Regulatory Asset of Rs.541.27 Crores in the approved ARR for the FY17, has allowed its recovery in the approved retail supply tariff for the FY17.

Once the Regulatory Asset is included in the approved ARR of the FY17 and the Commission, having allowed to recover the entire ARR in the retail supply tariff of the FY17, the question of including the same amount again in the APR of the FY17, for the reason that the actual receipt is not sufficient to the expenses of isolated year, would not arise and the same is not sustainable.

The BESCO, by including the amount of Regulatory Assets and carrying cost once again in the APR for the FY17 has inflated the ARR of the FY19 which has resulted in payment of extra fee to the Commission, on the expected revenue, unnecessarily. The BESCO shall avoid arbitrary inclusion of amounts the

BESCOM in the ARR and shall reconsider its proposal on the inclusion of Regulatory Assets and carrying cost in the APR for the FY17.

G. Observation on the New Proposals:

i. Separate Tariff for 1 MW and above consumers:

The BESCOM shall furnish the actual fixed expenditure incurred on HT installation having more than 1 MW, with break up based on audited accounts figure for the FY17 to substantiate the claims of the BESCOM for allowing separate tariff for 1MW and above consumers under open access.

ii. Additional charges for maximum demand exceeding the C.D:

The BESCOM has proposed to charge penal energy charges at 2 times the normal charges proportionate to the excess energy, in case the maximum demand exceeds the contract demand, which is at present being charged under normal tariff. The BESCOM shall furnish the legal provisions under which the proposal is made.

iii. Increase in Re-connection charges:

The BESCOM has proposed higher amount of Reconnection charges on LT and HT services. The basis for claiming such higher charges along with the actual expenditure involved for Reconnection services to the LT and HT consumers shall be furnished.

iv. Simplification of Tariff:

The BESCOM in its applications has informed that a detailed report on the Simplification of Tariff, as submitted by a Committee appointed by the GoK, has been submitted to the Commission. But, no such report has been received in the Commission, the BESCOM shall furnish the copy of the Report, along with its specific recommendations to implement.

v. Billing Cycle for Temporary installations:

The BESCOM has proposed that the billing cycle for LT 7 category may be 30 days as against the existing 28 days, to be in line with other category of

consumers. The proposal of the BESCOM is in contravention to the provision of CoS and not implementable. It not proper on the part of the BESCOM, to make such a proposal without seeking amendment to the provision of CoS and without studying the implementation aspects. Therefore, the BESCOM shall reconsider its proposal.

vi. Separate Tariff for battery charging facility for motor vehicles:

The BESCOM has indicated that, the Gol and the NITI Aayog are working on a policy for promotion of electric vehicles and there are going to be huge initiatives to encourage and promote e-mobility in future. It is also indicated that various companies are coming forward to set up the facility. The BESCOM has stated that as per the prevailing tariff, battery charging units are being billed under commercial tariff.

In line with Karnataka State Electric Vehicles & Energy Storage Policy, 2017, the BESCOM has proposed to have a separate tariff under HT and LT categories with Time of Day Tariff. But, the BESCOM has not made any specific proposal as to how the scheme works and what should be the tariff schedule (FC & EC) for such LT and HT installations along with the ToD tariff, keeping in view the initiative to encourage and promote the mobility of vehicles using electricity. Hence, after discussing the working of the battery charging centres with the interested persons and confirming the scheme of things, the BESCOM shall submit specific proposals for prescribing a separate tariff under HT and LT category and the ToD tariff giving justification for such a proposal.

H. Observations on Directives:

Sl. No.	Directives issued by the Commission	Observation made
1.	Consumer interaction meeting at Subdivision level.	the BESCOM was directed to conduct consumer interaction meetings at Subdivision level chaired by the SEE once in a quarter to redress the consumer complaints. the BESCOM has submitted the details of consumer interaction meetings conducted in all the subdivisions in 3 rd quarter of the FY18 on 21.10.2017. If such meetings are conducted on one day in its entire area covering all subdivisions, it is not clear as to how SEE or EE can attend and chair the meetings. The dates of such meetings in subdivisions should have been spread over in a quarter so that SEE or EE can attend and chair the meetings. The the BESCOM shall clarify this. The the BESCOM has not furnished the details for 1 st & 2 nd quarter. The the BESCOM shall furnish compliance thereon.
2.	Directive on preparation of energy bills on monthly basis by	the BESCOM shall furnish the month-wise details of number of open access consumers sourcing power from power exchange, open access units scheduled/consumed in MU and illegally banked energy, if any.

	considering 15 minute's time block period	
3.	Directive on Energy Conservation	<p>The the BESCOM was directed to service all the new installations only after ensuring that the BEE ***** (Bureau of Energy Efficiency five-star rating) rated Air Conditioners, Fans, Refrigerators, etc., are being installed in the applicant consumers' premises and to service all streetlight installations with LED/energy efficient lamps.</p> <p>The the BESCOM has not submitted compliance on the above directive regularly.</p> <p>the BESCOM has not indicated in its compliance measures taken to ensure use of five star rated equipment in all the existing domestic, commercial and industrial consumers.</p> <p>The the BESCOM shall submit the compliance thereon.</p>
4.	Directive on implementation of Standards of Performance (SoP)	<p>The the BESCOM was directed to display the SoP parameters in all its O&M subdivisions and O&M Sections and submit the quarterly progress. But the BESCOM has not submitted the compliance. the BESCOM shall submit the compliance regularly.</p>
5.	Directive on use of safety gear by linemen:	<p>the BESCOM has not submitted the quarterly compliance report to the Commission regularly.</p> <p>The Commission had directed the BESCOM to take action to sensitize all the linemen about the need for adoption of safety aspects in their work through suitably designed training and awareness programs. the BESCOM is required to submit the compliance on the above.</p> <p>The the BESCOM shall also submit the details of the number of linemen provided with complete set of safety gear at present and the definite timeline for providing with all linemen complete set of safety gear.</p>
6.	Directive on providing Timer Switches to Street lights by ESCOMs	<p>the BESCOM shall furnish the reasons as to why around 3500 no. of timer switches have not been rectified /replaced for the last two years and the definite timeline by which it will replace/rectify all such faulty timer switches.</p> <p>The status on the directive that the BESCOM shall initially provide the timer switches and later collect the cost from the local bodies should be reported.</p> <p>the BESCOM has also not submitted the compliance as to whether LED /energy efficient lamps are being used while servicing of streetlight installations.</p> <p>the BESCOM shall submit the compliance on the same.</p>
7.	Directive on Load shedding	<p>the BESCOMs is not submitting to the Commission, its projections of availability and demand for power and any unavoidable load shedding for every succeeding month in the last week of the preceding month for approval, regularly.</p> <p>the BESCOM shall submit compliance on the same.</p> <p>The the BESCOM has been submitting from the last two years that a system of informing the consumers/public through SMS in case of load shedding due to any reason, is under process.</p> <p>the BESCOM shall submit the reasons for delay in completion of this system and the definite timeline by which it will complete the same.</p>
8.	Directive on establishing a 24X 7 fully equipped centralized consumer service centers	<p>the BESCOM was directed to reduce the consumer downtime to address the complaints. the BESCOM is directed to report average time taken to attend to a complaint as at present and the efforts made to reduce the downtime further in future.</p>
9.	ENERGY AUDIT	<p><u>Energy Audit of cities / towns</u></p> <p>The Commission has observed that the the BESCOM has not furnished the details of feeder-wise energy audit as per the formats Annex-A & B prescribed by the Commission vide letter No. KERC/D/137/14/91 dated 20.04.2105 along with the details of measures initiated to reduce loss levels wherever the same are above 15%.</p> <p>the BESCOM shall furnish the same up to October 2017.</p>

		<p>The the BESCOM has also been reporting, from the last 3 years, the same reason that consumer indexing is not completed to take up feeder-wise energy auditing. The the BESCOM shall indicate definite timeline by which it will complete the consumer indexing for taking up energy auditing effectively.</p> <p>Also, the BESCOM shall furnish the comparative statement of losses recorded in Towns & Cities for the FY17 as against the FY16.</p> <p><u>DTCs Energy Audit:</u></p> <p>the BESCOM was directed to furnish the details of energy audit conducted in respect of DTCs for which meters have been fixed and the remedial measures initiated to reduce losses in those DTCs every month to the Commission regularly.</p> <p>However, the BESCOM has not submitted the details of energy audit conducted in respect of 1,13,630 DTCs for which meters have already been fixed.</p> <p>the BESCOM shall submit the details of energy audit conducted for the metered DTCs and the timeline by which all the remaining DTCs will be metered.</p>
10.	Implementation of HVDS	<p>the BESCOM has not submitted any analysis report indicating the benefits accrued to the system after implementation of the HVDS in Tumakuru and Chikkaballapura divisions.</p> <p>the BESCOM shall submit the same.</p>
11.	Implementation of NJY	<p>the BESCOM has reported that out of 358 completed feeders, it has commissioned 311feedres leaving balance of 47 feeders. the BESCOM shall furnish the timeline by which it would commission the completed</p> <p>the BESCOM has reported that it has fixed, overload relays during 2015 in substations to agricultural feeders to automatically trip the feeders in case over load during the single phase power supply. BESOM needs to verify whether this system is still working and the agricultural feeders are made to trip during overload, If the overload relays are not functioning or deliberately bypassed, then the Agricultural feeders are being given power supply on par with NJY feeders which amounts to but defeating the very purpose of implementation NJY. the BESCOM has also not spelt out the action taken by it to prevent misuse of power from NJY feeders to agricultural supply.</p> <p>the BESCOM is required to clarify on the above.</p>
12.	DSM in Agriculture	<p>The progress of Surya Raitha program in Kanakapura subdivision is the same as that of last year. The the BESCOM shall submit the analysis report indicating the benefits to the system in respect of completed 250 out of 350 pump sets under this scheme and the timeline by which it will complete the balance works shall be reported.</p>
13.	Electrification of un-electrified Households	<p>There is no progress as in the last year i.e., Further, the BESCOM has not indicated the total number of identified un-electrified households (both BPL & non BPL) in its jurisdiction (in respect of all the schemes), the number of households taken up for electrification and the timeline for completion of such works. the BESCOM shall furnish specific of the same.</p>
14.	Subdivision as Strategic Business Units (SBU)	<p>the BESCOM has not submitted the compliance in respect of implementation of Financial Management Framework, on quarterly basis regularly to the Commission.</p> <p>the BESCOM shall submit the detailed analysis and the result of Financial Management Framework Model introduced in its divisions /subdivisions to improve their performances.</p>
15.	Prevention of Electrical Accidents	<p>the BESCOM has not submitted the Division-wise action plan to minimize accidents. It has also not submitted the details of number of hazardous installations rectified and improvements carried out in the distribution system.</p> <p>the BESCOM is required to furnish the details of number of hazardous</p>

		<p>locations/installations identified in its distribution network and the number of such installations rectified in the FY 17 and in the FY18 up to November 2017, besides giving an action plan to rectify them.</p> <p>the BESCO has reported that it has taken up maintenance of one feeder in each division every month, however the details of the numbers of feeders completed from April-November 2017 and whether electrical accidents have come down due to such maintenance works have not been furnished. the BESCO is required to furnish compliance thereon.</p>
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