

**AGGREGATE REVENUE REQUIREMENT
&
EXPECTED REVENUE FROM CHARGES
FOR THE CONTROL PERIOD
(FY 2022-23 to FY 2026-27)**

Submitted to
Kerala State Electricity Regulatory Commission

15th February 2022



RUBBER PARK INDIA PRIVATE LIMITED

A Joint Venture of  **kinфра** &  **Rubber Board**

Regd. Off- 2 A, "Kautileeyam", Rubber Park, Valayanchirangara,P.O
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BEFORE THE KERALA STATE ELECTRICITY REGULATORY COMMISSION

Filing No. /2022

Case No.

IN THE MATTER OF: Application for the approval of the Aggregate Revenue Requirement and Expected Revenue from Charges for the second control period (FY 2022-23 to 2026-27).

And

IN THE MATTER OF:Rubber Park India Private Ltd,
2 A Kauteeliyam,
Valayanchirangara,
Ernakulam -683 556

The petitioner named above respectfully submits as under:

1. The petitioner is distribution licensee in the areas as notified by the Government of Kerala vide G.O. (P) No.20/2003/PD dated 17-06-2003 (Gazette Extra Ordinary No.1199 dated 05-07-2003).
2. The Petitioner submits that the Hon'ble Commission has issued the following regulations namely, KSERC (Terms and Conditions for Determination of Tariff) Regulations, 2021 (hereinafter referred as "**KSERC MYT Regulations, 2021**").
3. As per the KSERC MYT Regulations 2021, thirty first day of December 2021 is the last date for filing the petition for approval of Aggregate Revenue Requirement and determination of tariff for each year of the Control Period.
4. Accordingly, Rubber Park is filing this petition for the approval of Aggregate Revenue Requirement and Expected revenue from charges for the second control period starting from FY 2022-23 to 2027.

Date: 15th February, 2022

Petitioner

**Managing Director
Rubber Park India (P) Ltd**

**BEFORE THE KERALA STATE ELECTRICITY REGULATORY COMMISSION
C.V.Raman Pillai Road,Vellayambalam,Thiruvananthapuram-695010**

Filing No.

Case No.

IN THE MATTER OF: Application for the approval of the Aggregate Revenue Requirement and Expected Revenue from Charges for the second control period (FY 2022-23 to 2026-27).

And

IN THE MATTER OF: Rubber Park India Private Ltd, Ernakulam.

Applicant

Managing Director

Rubber Park India Private Ltd,
Ernakulam-683556

AFFIDAVIT VERIFYING THE APPLICATION ACCOMPANYING FILING OF AGGREGATE REVENUE REQUIREMENT & EXPECTED REVENUE FROM CHARGES FOR THE CONTROL PERIOD 2022-23 to 2026-27

I, J. Krishnakumar, S/o Sri. K..Janardhanan Pillai(late) aged 66 years residing at Vishakham, House No. 30/1645, October Road, Vyttila, Ernakulam -682019 do solemnly affirm and state as follows:

1. I am the Managing Director of Rubber Park India (P) Ltd, 2 A, Kautileeyam, Valayanchirangara-683556, Ernakulam District, Kerala State and the petitioner in the above matter and I am duly authorized by the company to make this affidavit on its behalf. I solemnly affirm at Perumbavoor on this 15th day of February 2022 that
 - (i). The contents of the above petition are true to my information, knowledge and belief. I believe that no part of it is false and no material has been concealed there from
 - (ii). The statements made in paragraphs of the accompanying application herein now shown to me are true to my knowledge and are derived from the official records made available to me and are based on information and advice received which I believe to be true and correct.

Deponent

Managing Director

Rubber Park India Private Ltd,

Ernakulam-683556

VERIFICATION

I, the above-named deponent solemnly affirm at Perumbavoor on this, the 15th day of February 2022 that the contents of the affidavit are true to my information, knowledge and belief, that no part of it is false and that no material has been concealed there from.

Deponent

Managing Director

Rubber Park India Private Ltd,

Solemnly affirmed and signed before me **Ernakulam-683556**
Advocate and Notary

Table of Contents

1. BACKGROUND.....	06
1.1. Introduction.	06
1.2. Objective of the present MYT Petition.....	06
2. Contents of the Petition	08
3. Capital Investment Plan for FY 2022-23 to FY 2026-27.....	09
3.1. Introduction.....	09
3.2. Capital Investment plan for the year 2022-23.....	10
3.3. Capital Investment plan for the year 2023-24.....	11
3.4. Capital Investment plan for the year 2024-25.....	12
3.5. Capital Investment plan for the year 2025-26.....	14
3.6. Capital Investment plan for the year 2026-27.....	15
4. Aggregate Revenue Requirement for the control period.....	16
4.1. Energy sales forecast for the control period.....	16
4.2. Distribution loss.....	20
4.3. Power Purchase Expenses.....	21
4.4. Operation & Maintenance Expenses.....	25
4.4.1. Employee Expenses.....	25
4.4.2. R&M Expenses.....	29
4.4.3. A&G Expenses.....	30
4.5. Fixed Assets and Depreciation.....	30
4.6. Return on Equity Share Capital.....	31
4.6. Interest on Normative loan.....	33
4.7. Finance Charges.....	34
4.8. Tax on Returns.....	35
5. Expected Revenue from Charges.....	36
5.1. Revenue from sale of power.....	36
5.2. Non-Tariff income.....	39
5.3. Income from wheeling Charges.....	39
6. Revenue surplus/deficit.....	40
7. Prayer.....	40
8. Annexure.....	41

1. BACKGROUND

1.1 Introduction

The Rubber Park India (P) Ltd is a joint venture of Kerala Industrial Infrastructure Development Corporation (Kinfra) and Rubber Board. The Company was incorporated in 1997 under The Companies Act 1956 for establishing industrial parks, exclusively for rubber and rubber wood-based industries with world class infrastructure. The first park was set up in 107 acres at Irapuram in Kunnathunadu Taluk, near Perumbavoor, in Ernakulam Dist. The work of second park in 45 acres of land at Piravanthoor in Pathanapuram Taluk, near Punalur in Kollam District is progressing and expected to be commissioned in April 2022.

Government of Kerala, vide **G.O. (P) No.20/2003/PD dated 17-06-2003** notified as **Gazette Extra Ordinary No.1199 dated 05-07-2003**, granted license to RPIPL, under the provisions of Indian Electricity Act, 1910 for distribution of power at Rubber Park, Irapuram. Rubber Park owns a 110/11 kV, 25 mVA capacity substation and well-established ring main power distribution network for supply of power to various consumers in the park. There are 2 ring main distribution system with 11 kV underground Cables, two numbers of 11 kV dedicated feeder supply and 9 unitized Substations. Since inception Rubber Park adopted prepaid billing system for the consumers. Rubber Park receives power from KSEB at 110 kV through 110 kV double circuit Kalamassery –Muvattupuzha feeder drawn from Kalamassery Sub Station. The area of operation is limited to the boundaries of the Rubber Park. In addition to serving the consumers inside the park, we have provided open access facility to one of the consumer of KSEB Ltd at 11 kV voltage level.

1.2. Objective of the present MYT Petition

The Hon'ble Commission by exercising its powers conferred under Section 61 read with Section 181 of the Electricity Act, 2003 (Central Act 36 of 2003) had issued Kerala State Electricity Regulatory Commission (Terms and Conditions for Determination of Tariff) Regulations, 2021. Rubber Park is submitting the present MYT petition in compliance with regulation 10. (1) of the KSERC MYT Regulations 2021, comprising of:

10. Filing under the Multi-Year Tariff (MYT) framework. –

(1) Every generating business/ company or transmission business/ licensee or distribution business/ licensee or State Load Despatch Centre shall file, on or before the Thirty first day of December 2021, the following petitions for the Control Period:

(i) Petitions for approval of Aggregate Revenue Requirement and determination of tariff separately for each year of the Control Period, including capital investment plan for each year of the Control Period;

Provided that, in the case of Generation Business/ Company, Transmission Business/Licensee, Distribution Business/Licensee & SLDC of Kerala State Electricity Board Limited and Thrissur Corporation Electricity Department, separate petition shall be filed on or before 20th December 2021 for the approval of the Capital Investment Plan for each year of the Control Period.

The present petition for the Aggregate Revenue Requirement and Expected Revenue from Charges has been prepared in compliance to provisions under Section 61 and 62 of the Electricity Act 2003 together with other relevant provisions in the Hon'ble Commission's Conduct of Business Regulations and KSERC MYT Regulation 2021 to the possible extent on the basis of reasonable assumptions and within the limitations of availability of data.

Accordingly, Rubber Park is submitting the present petition for approval of Aggregate Revenue Requirement and determination of tariff for each year of the Control Period i.e. from FY 2022-23 to FY 2026-27 under KSERC MYT Regulation 2021 for the approval of the Hon'ble Commission.

2. CONTENTS OF THE PETITION.

This petition has in detail basis, assumptions and projections of individual elements of the multiyear tariff projections for FY 2022-23 to 2026-27. The following sections explain in detail the basis and projected forecasts of the following elements for FY 2022-23 to 2026-27:

A. Capital Investment Plan

B. Determination of Aggregate Revenue Requirement by forecasting the following:

1. Energy Sales
2. Distribution Loss and Energy Requirement
3. Power Purchase Cost.
4. Employee Cost
5. Repairs & Maintenance Cost
6. Administrative & General Expenses
7. Finance Charges
8. Depreciation
9. Return on Equity
10. Interest on Normative loan

C. Expected Revenue from Charges

1. Revenue from Tariff
2. Non-Tariff Income

D. Determination of Gap between Revenue at existing Tariff & Costs.

3. CAPITAL INVESTMENT PLAN

3.1. Introduction

The capital investment plan of Rubber Park is very much dependent on the consumer growth. Hence, the onetime capital investment plan for the entire control period will not be sufficient to meet the unforeseen additional capitalization arises during the control period. It will restrict capital investments required by the company to meet the statutory obligations not anticipated at the beginning of the control period. Hence, the company humbly requests that the Hon. Commission may kindly allow the company to file petition for additional capital investment over and above the capital investment plan projected in this petition during the tenure of the KSERC MYT tariff Regulation 2021.

Rubber Park is submitting the capital investment plan for the control period of the MYT tariff Regulation 2021 in compliance with Annexure 4 (C) of the KSERC MYT Regulations 2021, comprising of:

4(C). Submission of Detailed Project Reports, -

(1) The distribution licensees shall submit separate capital investment schemes with Detailed Project Reports for consideration and approval including the need for the investment and its cost-benefit analysis, if the capital investment of each of the schemes exceeds the limits specified below against the licensees concerned.

- i (i) KSEB Ltd. ₹ 10 Crore*
- ii (ii) KDHPCL, TCED and CPT ₹ 25 Lakh*
- iii (iii) Other distribution licenses ₹ 15 lakh*

3.2. Capital Investment plan for the year 2022-23

Sl. No.	Particulars	Qty	Total (Rs. in Lakhs)
a	HT TOD Energy Meter	6	2.4
b	Desktop & Laptop	3	3.4
c	11 kV retrofit Vacuum Circuit Breaker in place of SF6 Circuit Breaker	1	6.5
	Total		12.3

(a) HT TOD Energy Meter

Necessity of the Investment:

The present meters installed in the EHT substation were 0.5s class accuracy and very old. The EHT side metering of the Substation is already 0.2s class ABT meters and most of the consumer meters are also 0.2s class accuracy. Hence, we are proposing to replace the existing meters with 0.2s HT TOD meters. The estimation is based on the market rate.

Capital expense schedule and Expected Capitalization:

The capital expenditure towards the above work is estimated at a cost of Rs. 2.4 Lakhs.

Financing of Total Capital Expenditure

The capital expenditure is proposed to be financed from the equity of the company.

(b) Desktop

Most of the computers (both laptop and desktop) used by the company are more than 10 years old. The present configurations of the computers are outdated. The operating systems of the present computers are older versions of Windows. Most of the new applications require computers with Windows 10 or higher operating systems. However, due to the outdated configuration, the systems will not support high end operating systems like Windows 10. As such the company has planned to replace the computers in a phased manner. The company is proposing to purchase 2 numbers of laptops and 1 number of desktop during the year 2022-23. The estimation is based on the market rate.

Capital expense schedule and Expected Capitalization:

The capital expenditure towards the above work is estimated at a cost of Rs. 3.4 Lakhs.

Financing of Total Capital Expenditure

The capital expenditure is proposed to be financed from the equity of the company.

(c) 11 kV retrofit Vacuum Circuit Breaker in place of SF6 Circuit Breaker**Necessity of the Investment:**

The company is having 9 numbers of 11 kV feeder circuit breakers in the EHT substation for providing supply to the consumers. Out of which, 5 of the 11 kV Circuit Breakers are vacuum type circuit breakers (model: VD4) and 4 of them are SF6 type 11 kV Circuit breakers of ABB make. The manufacturer had stopped the production of both models of circuit breakers and hence the spare parts for repair are also not easily available. As such the company has planned to replace the 11 kV Circuit Breakers in a phased manner. The company is proposing to purchase 1 number of 11 kV retrofit Vacuum Circuit Breaker in place of existing 11 kV SF6 Circuit Breaker during the year 2022-23. The estimation is based on the market rate.

Capital expense schedule and Expected Capitalization:

The capital expenditure towards the above work is estimated at a cost of Rs. 6.5Lakhs.

Financing of Total Capital Expenditure

The capital works are proposed to be financed from the equity of the company.

3.3. Capital Investment plan for the year 2023-24

Sl. No	Particulars	Qty	Unit Price (Rs. Lakh)	Total (Rs. in Lakhs)
a	Retrofit breaker for the 110 kV EHT Circuit Breaker Alstom FX 11	1	12	12
	Total			12

(a) Retrofit Circuit Breaker in place of the 110 kV EHT Circuit Breaker Alstom FX 11

Necessity of the Investment:

The company is having two numbers of Power transformers and two numbers of EHT circuit breakers for the protection of the Power transformers. In which one of the circuit breakers is of ABB make and another one is of Alstom make. The model of Alstom make EHT circuit breaker is FX 11. At present Alstom is not manufacturing circuit breakers and hence spare parts for repair is also not easily available. As such, the company is proposing a retrofit Circuit Breaker in place of the existing EHT circuit breaker Alstom FX 11.

Capital expense schedule and Expected Capitalization:

The capital expenditure towards the above work is estimated at a cost of Rs. 12 Lakhs.

Financing of Total Capital Expenditure

The capital works are proposed to be financed from the equity of the company.

3.4. Capital Investment plan for the year 2024-25

Sl. No.	Particulars	Qty	Unit Price (Rs. Lakh)	Total (Rs. in Lakhs)
a	11 kV retrofit Vacuum Circuit Breaker in place of VD4 VCB	1	5	5
b	11 kV retrofit Vacuum Circuit Breaker in place of SF6 Circuit Breaker	1	6.5	6.5
c	Printer	1	1.5	1.5
	Total			13

(a) 11 kV retrofit Vacuum Circuit Breaker in place of VD4 Circuit Breaker

Necessity of the Investment:

The company is having 9 numbers of 11 kV feeder circuit breakers in the EHT substation for providing supply to the consumers. Out of which 5 of the 11 kV Circuit Breakers are vacuum type

circuit breakers (model: VD4) and 4 of them are SF6 type 11 kV Circuit breakers of ABB make. The manufacturer has stopped the production of both models of circuit breakers and hence the spare parts for repair are also not easily available. As such the company has planned to replace the 11 kV Circuit Breakers in a phased manner. The company is proposing to purchase 1 number of 11 kV retrofit Vacuum Circuit Breaker in place of existing 11 kV VD4 model Vacuum Circuit Breaker during the year 2024-25. The estimation is based on the market rate.

Capital expense schedule and Expected Capitalization:

The capital expenditure towards the above work is estimated at a cost of Rs. 5 Lakhs.

Financing of Total Capital Expenditure

The capital works are proposed to be financed from the equity of the company.

(c) 11 kV retrofit Vacuum Circuit Breaker in place of SF6 Circuit Breaker

Necessity of the Investment:

The company is having 9 numbers of 11 kV feeder circuit breakers in the EHT substation for providing supply to the consumers. Out of which 5 of the 11 kV Circuit Breakers are vacuum type circuit breakers (model: VD4) and 4 of them are SF6 type 11 kV Circuit breakers of ABB make. The manufacturer has stopped the production of both models of circuit breakers and hence the spare parts for repair are also not easily available. As such the company has planned to replace the 11 kV Circuit Breakers in a phased manner. The company is proposing to purchase 1 number of 11 kV retrofit Vacuum Circuit Breaker in place of existing 11 kV SF6 Circuit Breaker during the year 2024-25. The estimation is based on the market rate.

Capital expense schedule and Expected Capitalization:

The capital expenditure towards the above work is estimated at a cost of Rs. 6.5 Lakhs.

Financing of Total Capital Expenditure

The capital works are proposed to be financed from the equity of the company.

(c) Printer

The existing printers of the company are very old and hence the company proposes the purchase of one new printer for general office purposes.

Capital expense schedule and Expected Capitalization:

The capital expenditure towards the above work is estimated at a cost of Rs. 1.5 Lakhs.

Financing of Total Capital Expenditure

The capital works are proposed to be financed from the equity of the company.

3.5. Capital Investment plan for the year 2025-26

Sl. No.	Particulars	Qty	Unit Price (Rs. Lakh)	Total (Rs. in Lakhs)
a	11 kV SF6 Ring Main Units in place of Oil RMU	2	6.8	13.6
	Total			13.6

(a) 11 kV SF6 Ring Main Units in place of Oil RMU

Necessity of the Investment:

The company is having 9 numbers of unitised substation for providing low tension power supply to the consumers and in which oil type Ring Main Units are used for tapping the 11 kV power from the HT distribution network of the company. The oil type Ring Main units are of old type technology and now a days SF6 type Ring main units are commonly used. As such the company has planned to replace two numbers of the 11 kV oil type RMU units with SF6 type Ring main units during 2025-26. The estimation is based on the market rate.

Capital expense schedule and Expected Capitalization:

The capital expenditure towards the above work is estimated at a cost of Rs. 13.6 Lakhs.

Financing of Total Capital Expenditure

The capital works are proposed to be financed from the equity of the company.

3.6. Capital Investment plan for the year 2026-27

Sl. No.	Particulars	Qty	Unit Price (Rs. Lakh)	Total (Rs. in Lakhs)
a	11 kV retrofit Vacuum CB in place of SF6 Circuit Breaker	2	7	14
	Total			14

(a) 11 kV retrofit Vacuum Circuit Breaker in place of SF6 Circuit Breaker

Necessity of the Investment:

The company is having 9 numbers of 11 kV feeder circuit breakers in the EHT substation for providing supply to the consumers. Out of which 5 of the 11 kV Circuit Breakers are vacuum type circuit breakers (model: VD4) and 4 of them are SF6 type 11 kV Circuit breakers of ABB make. The manufacturer had stopped the production of both models of circuit breakers and hence the spare parts for repair are also not easily available. As such the company has planned to replace the 11 kV Circuit Breakers in a phased manner. The company is proposing to purchase 2 numbers of 11 kV retrofit Vacuum Circuit Breaker in place of existing 11 kV SF6 Circuit Breaker during the year 2024-25. The estimation is based on the market rate.

Capital expense schedule and Expected Capitalization:

The capital expenditure towards the above work is estimated at a cost of Rs. 14 Lakhs.

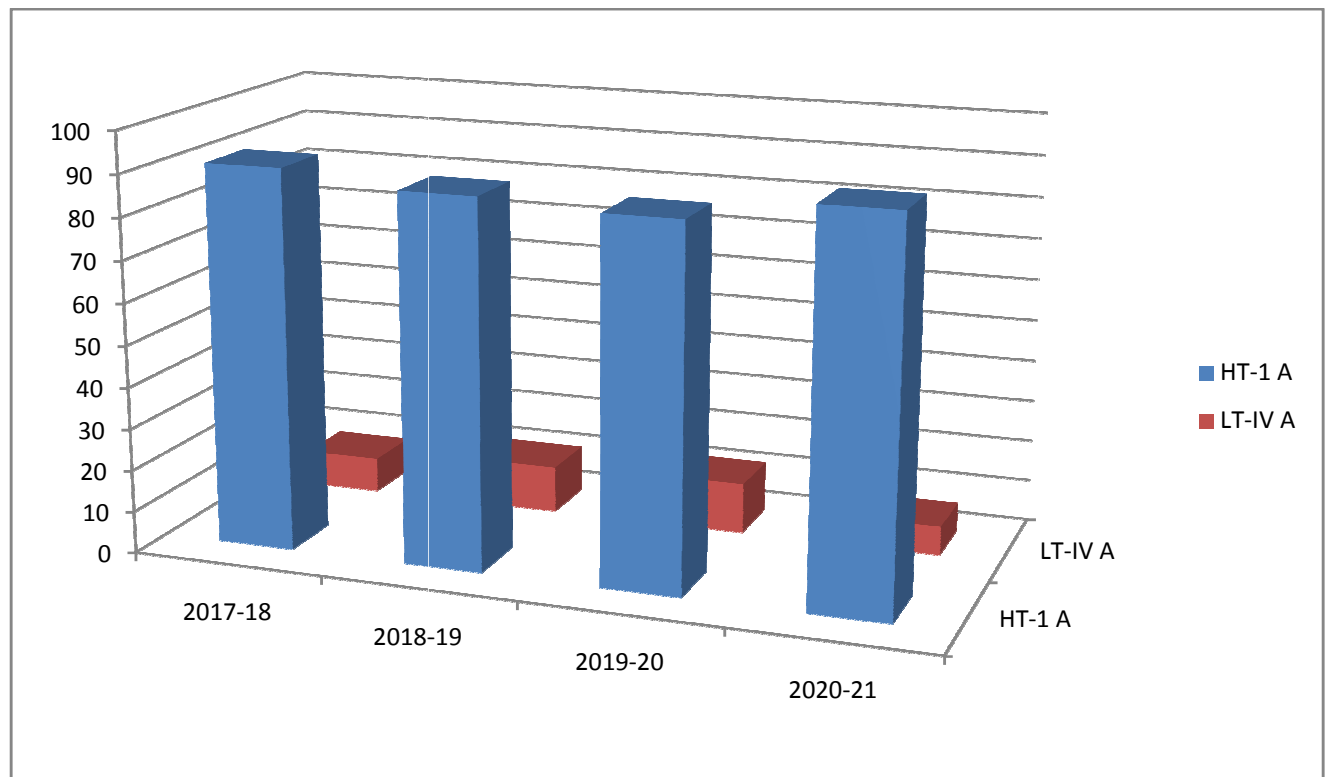
Financing of Total Capital Expenditure

The capital works are proposed to be financed from the equity of the company.

4. PROJECTION OF AGGREGATE REVENUE REQUIREMENT FOR THE CONTROL PERIOD.

4.01. Energy Sales forecast for the control period

The 98 % of the total energy sales of Rubber Park is contributed by the HT-1 industrial consumers and LT-IV industrial consumers. The Covid-19 pandemic resulted in fluctuation in the industrial production in the past and running financial years and as a result the energy sales of the company to the consumers are also not stable during the past financial years. The energy sales pattern of the consumers of Rubber Park during the year 2020-21 is graphically represented below.



Hence, Rubber Park has adopted a trend analysis method of the past five years for projecting the sales for the control period. The area of operation of Rubber Park is limited and hence the development of the production capacity of the existing consumers will be a major deciding factor of the energy sales of the licensee for the control period.

The trend analysis of the energy sales of the past 5 years from 2015-16 is tabulated below.

Sales trend analysis of HT Consumers								
Year	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	Average	2021-22 (Estimate)
Sales in MU	26.69	31.52	29.63	30.48	25.65	29.59	2.89 %	32.8
Increase (%)		18.09	(5.99)	2.87	(15.85)	15.36		10.84%

4.01.02. Sales Forecasting for the control period

As per the trend analysis of the past 5 years, the energy sales of the licensee were showing only 2.89% increase from the year 2015-16 to 2020-21. The Covid-19 resulted in very less energy sales during the year 2019-20. The company had estimated the energy sales during the year 2021-22 based on the actual energy sales up to December 2021. However, the impact of third wave of Covid-19 spread may result in less energy sales during the year 2021-22 than the estimated sales forecast based on the actual energy sales till December. Moreover, the licensee is not expecting any new consumers in the upcoming two years. Hence, the licensee is not anticipating any significant increase in the energy sales for the year 2022-23. The company had allotted certain lands to the industries during the year 2021-22 and the full-fledged commercial operation will be expected in the financial year 2022-23. As such, the company had taken the average increase of 5% during the years 2023-24, 2024-25 and 2025-26.

4.01.03. Approach for sales Projection for the control period

The energy sale for the control period was forecasted on the following basis.

Year	Approach
2022-23	The energy sale for the year was estimated based on the actual sales up to December 2021.
2023-24	The company had anticipated an increase of 3% in the energy sales to HT-1 and LT IV industrial consumers which is the average yearly increase of the past 5 years, during the year 2023-24. The company was expecting an additional contract demand of 400 kVA in HT and 75 kVA in LT.
2024-25	The company had anticipated an increase of 3% in the energy sales to HT-1 and LT IV

	industrial consumers which is the average yearly increase of the past 5 years, during the year 2024-25. The company was expecting an additional contract demand of 400 kVA in HT and 75 kVA in LT.
2025-26	The company had anticipated an increase of 3% in the energy sales to HT-1 and LT IV industrial consumers which is the average yearly increase of the past 5 years, during the year 2025-26. The company was expecting an additional contract demand of 400 kVA in HT and 150 kVA in LT.
2026-27	The company had anticipated an increase of 3% in the energy sales to HT-1 and LT IV industrial consumers which is the average yearly increase of the past 5 years, during the year 2026-27.

4.01.04. Projection of Energy sales for the control period.

The energy sales forecasted for the control period is tabulated below.

Energy Sales Estimated for the year 2021-22			
Tariff Category	No. of Consumers	Energy sales (up to December 2021) (MU)	Energy sales Estimated for the year 2021-22 based on actual sales up to December-21 (MU)
HT-1	20	22.398	29.864
LT IV	23	1.90	2.537
LT VI B	1	0.0049	0.007
LT VI F	2	0.07	0.093
LT VII A	17	0.2	0.267
Street Light	6	0.02	0.031
Total	69	24.59	32.799
Open Access (M/Fuel KSEB)	1	0.26	0.347
Total			33.146

Energy Sales Projected for the year 2022-23			
Tariff Category	No. of Consumers	Energy sales Estimated for the year 2022-23	Remarks
HT-1	20	29.864	No increase in sales estimated from the year 2021-22.
LT IV	23	2.537	
LT VI B	1	0.007	
LT VI F	2	0.093	
LT VII A	17	0.267	
Street Light	6	0.031	
Total	69	32.799	

Open Access (M/Fuel KSEB)	1	0.347	
Total		33.146	

Energy Sales Projected for the year 2023-24			
Tariff Category	No. of Consumers	Energy sales Estimated for the year 2023-24	Remarks
HT-1	22	30.76	3% increase in sales estimated of HT-1 & LT IV industrial consumers from previous year. Addition of two consumers expected in HT-1 and one consumer in LT IV tariff categories.
LT IV	24	2.61	
LT VI B	1	0.007	
LT VI F	2	0.093	
LT VII A	17	0.267	
Street Light	6	0.031	
Total	72	33.77	
Open Access (M/Fuel KSEB)	1	0.347	
Total		34.12	

Energy Sales Projected for the year 2024-25			
Tariff Category	No. of Consumers	Energy sales Estimated for the year 2024-25	Remarks
HT-1	24	31.68	3% increase in sales estimated of HT-1 & LT IV industrial consumers from previous year. Addition of two consumers expected in HT-1 and one consumer in LT IV tariff categories.
LT IV	25	2.69	
LT VI B	1	0.007	
LT VI F	2	0.093	
LT VII A	17	0.267	
Street Light	6	0.031	
Total	75	34.77	
Open Access (M/Fuel KSEB)	1	0.347	
Total		35.12	

Energy Sales Projected for the year 2025-26			
Tariff Category	No. of Consumers	Energy sales Estimated for the year 2025-26	Remarks
HT-1	26	32.63	3% increase in sales estimated of HT-1 & LT IV industrial consumers from previous year. Addition of two consumers expected in HT-1 and two consumers in LT IV tariff categories.
LT IV	27	2.77	
LT VI B	1	0.007	
LT VI F	2	0.093	
LT VII A	17	0.267	
Street Light	6	0.031	
Total	79	35.80	
Open Access (M/Fuel KSEB)	1	0.347	
Total		36.15	

Energy Sales Projected for the year 2026-27			
Tariff Category	No. of Consumers	Energy sales Estimated for the year 2026-27	Remarks
HT-1	26	33.61	3% increase in sales estimated of HT-1 & LT IV industrial consumers from previous year.
LT IV	27	2.86	
LT VI B	1	0.007	
LT VI F	2	0.093	
LT VII A	17	0.267	
Street Light	6	0.031	
Total	79	36.87	
Open Access (M/Fuel KSEB)	1	0.347	
Total		37.22	

4.2. DISTRIBUTION LOSS

The licensee had taken every effort to reduce the distribution loss level. The company has constantly through its endeavours tried to reduce its losses in the past. These efforts shall continue and will be enhanced. The company had taken the approved distribution loss of 1.9% by the Hon. Commission in the past control period for the control period from 2022-23 to 2026-27. The voltage wise distribution loss projected for the control period is tabulated below.

Year: 2021-22 (Estimation)					
Sl. No.	Particulars	Energy Input	Energy Sales	Distribution Loss	
		MKWh	MKWh	Percent	MKWh
1	Overall Distribution Loss	33.79	33.146	1.9	0.64

Year: 2022-23 (Projection)					
Sl. No.	Particulars	Energy Input	Energy Sales	Distribution Loss	
		MKWh	MKWh	Percent	MKWh
1	Overall Distribution Loss	33.79	33.146	1.9	0.64

Year: 2023-24 (Projection)

Sl. No.	Particulars	Energy Input	Energy Sales	Distribution Loss	
		MKWh	MKWh	Percent	MKWh
1	Overall Distribution Loss	34.78	34.12	1.9	0.66

Year: 2024-25 (Projection)

Sl. No.	Particulars	Energy Input	Energy Sales	Distribution Loss	
		MKWh	MKWh	Percent	MKWh
1	Overall Distribution Loss	35.8	35.12	1.9	0.68

Year: 2025-26 (Projection)

Sl. No.	Particulars	Energy Input	Energy Sales	Distribution Loss	
		MKWh	MKWh	Percent	MKWh
1	Overall Distribution Loss	36.851	36.15	1.9	0.7

Year: 2026-27 (Projection)

Sl. No.	Particulars	Energy Input	Energy Sales	Distribution Loss	
		MKWh	MKWh	Percent	MKWh
1	Overall Distribution Loss	37.93	37.21	1.9	0.720

4.3. POWER PURCHASE COST

The small power distribution licensees in the state are purchasing power from the state utility KSEB Ltd since inception. As such, the company has projected the power purchase cost for the control period as per the prevailing bulk supply tariff fixed by the Hon. Commission in the tariff order. The Hon. Commission had fixed the Renewable power purchase obligation of the distribution licensees

till the FY 2021-22 vide the Kerala State Electricity Regulatory Commission (Renewable Energy and Net Metering) Regulations, 2020. The Regulation 4(5) and 4(6) of the KSERC (Renewable Energy and Net Metering) Regulations, 2020 provides as follows.

Regulations 4 (5): - *The distribution licensee shall submit to the Commission, the proposed quantum of purchase of renewable energy from the solar sources and from the non-solar sources, separately in its petition for the approval of the Aggregate Revenue Requirement and Expected Revenue from Charges, for each financial year of the control period.*

Regulations 4 (6): - *A distribution licensee which is engaged in bulk purchase of electricity from another licensee shall not have separate obligation for purchase of renewable energy if,-*

(i) the seller licensee meets the renewable purchase obligation for the energy sold to the licensee or

(ii) The licensee reimburses to the seller licensee the additional cost incurred as approved by the Commission by the seller licensee for the generation or purchase of renewable energy to meet the renewable purchase obligation of the licensee.

The company is not having sufficient area to install renewable energy sources for generation of power and hence company intends to purchase the renewable energy from the seller licensee KSEB Ltd itself. The company ready to reimburse- to the seller licensee M/s. KSEB the additional cost incurred as approved by the Hon. Commission for the generation or purchase of renewable energy to meet the renewable purchase obligation of the company. As such, we humbly request that Hon. Commission may kindly determine the additional cost for meeting the renewable purchase obligation of the company while determining the bulk supply tariff of the power distribution licensees.

4.3.1. Approach for Power Purchase Projection from KSEB Ltd for the control period

The company had taken the present **BST** applicable for Rubber Park for calculating the power purchase cost for each year of the control period. The power purchase directly from KSEB Ltd for the control period was forecasted on the following basis.

Year	Approach	
	Purchase Units	Contract Demand
2022-23	The energy purchase for the year was arrived from the total sales projected for the year 2022-23 by taking into consideration of the distribution loss of 1.9%.	The maximum demand recorded during the year 2021-22 was 6780 kVA. The company had already got approval for additional PPA for 1300 kVA totaling to 8000 kVA and the PPA will be executed with KSEB Ltd during the year 2018-19. Hence, the company had projected the Power purchase requirement for the year by taking the maximum recorded demand of 6700 kVA.
2023-24	The energy purchase for the year was arrived from the total sales projected for the year 2023-24 by taking into consideration of the distribution loss of 1.9%.	The company had expected additional load requirement of 400 kVA in HT and 75 kVA in LT from the prospective consumers during the year 2023-24. The company had taken the same additional load for calculating the contract demand for the year. As such the company had taken a contract demand of 7175 for projecting the power purchase cost for the year 2023-24.
2024-25	The energy purchase for the year was arrived from the total sales projected for the year 2024-25 by taking into consideration of the distribution loss of 1.9%.	The company had expected additional load requirement of 400 kVA in HT and 75 kVA in LT from the prospective consumers during the year 2024-25. The company had taken the same additional load for calculating the contract demand for the year. As such the company had taken a contract demand of 7650 for projecting the power purchase cost for the year 2024-25.
2025-26	The energy purchase for the year was arrived from the total sales projected for the year 2025-26 by taking into consideration of the distribution loss of 1.9%.	The company had expected additional load requirement of 400 kVA in HT and 150 kVA in LT from the prospective consumers during the year 2024-25. The company had taken the same additional load for calculating the contract demand for the year. As such the company had taken a contract demand of 8200 for projecting the power purchase cost for the year 2025-26.

2026-27	The energy purchase for the year was arrived from the total sales projected for the year 2026-27 by taking into consideration of the distribution loss of 1.9%.	The company had taken the same level of contract demand of the year 2025-26 too for the year 2026-27.
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4.3.3. Summary of Total Power Purchase Cost for the control period.

The power purchase cost projected for each year of the control period is tabulated below.

Total Power purchase cost for the year 2022-23

Source of Power	Units as per ABT meter	Open access sale	Actual Energy purchased	Maximum Demand	Energy Charge	Demand Charge	Total (Rs. in Lakhs)
	A	B	C = A-B	D	E=C*4.75*10	F=D*340*12	G=E+F
KSEB Ltd	33.79	0.35	33.44	6700	1588.46	273.36	1861.82

Total Power purchase cost for the year 2023-24

Source of Power	Units as per ABT meter	Open access sale	Actual Energy purchased	Maximum Demand	Energy Charge	Demand Charge	Total (Rs. in Lakhs)
	A	B	C = A-B	D	E=C*4.75*10	F=D*340*12	G=E+F
KSEB Ltd	34.78	0.35	34.43	7175	1635.52	292.74	1928.26

Total Power purchase cost for the year 2024-25

Source of Power	Units as per ABT meter	Open access sale	Actual Energy purchased	Maximum Demand	Energy Charge	Demand Charge	Total (Rs. in Lakhs)
	A	B	C = A-B	D	E=C*4.75*10	F=D*340*12	G=E+F
KSEB Ltd	35.8	0.35	35.45	7650	1684	312.12	1996.12

Total Power purchase cost for the year 2025-26

Source of Power	Units as per ABT meter	Open access sale	Actual Energy purchased	Maximum Demand	Energy Charge	Demand Charge	Total (Rs. in Lakhs)
	A	B	C = A-B	D	E=C*4.75*10	F=D*340*12	G=E+F
KSEB	36.85	0.35	36.5	8200	1733.94	334.56	2068.50

Ltd							
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Total Power purchase cost for the year 2026-27

Source of Power	Units as per ABT meter	Open access sale	Actual Energy purchased	Maximum Demand	Energy Charge	Demand Charge	Total (Rs. in Lakhs)
	A	B	C = A-B	D	E=C*4.75*10	F=D*340*12	G=E+F
KSEB Ltd	37.93	0.35	37.59	8200	1785.37	334.56	2119.93

4.4. OPERATION & MAINTENANCE EXPENSES.

As per the regulation 80 (1)&(2) of the KSERC (MYT) Regulation 2021 the company is allowed to recover operation and maintenance expenses as per the norms specified in Annexure-7 of the Regulations for each financial year of the Control Period. The operation and maintenance expenses of Rubber Park consist of the following.

4.4.1. Employee Expenses.

4.4.2. R&M Expenses

4.4.3.A&G Expenses

The company has broadly discussed each component of the O&M expenses as below.

4.4.1. Employee Expenses

The employee expense for the control period in the KSERC MYT Regulation 2021 was arrived from the employee expenses approved in the Truing Up of the year 2018-19. The ministry of power vide the notification no. CG-DL-E-03102020-222232 dated 01.10.2020 has amended the notification of the Government of India in the Ministry of Power number S.O. 394 (E), dated the 12th March, 2007 and classified those entities having issued distribution license by State/Joint Electricity Regulatory Commission under the Electricity Act, 2003 under the purview of Designated Consumers. The BEE vide notification No. 18/1/BEE/DISCOM/2021 dated 06.10.2021 published **Bureau of Energy Efficiency (Manner and Intervals for Conduct of Energy Audit in electricity distribution companies) Regulations, 2021**. A copy of the Regulation is enclosed as Annexure-1. The above Regulation is applicable to all electricity distribution companies specified as designated consumer and hence all the power distribution licensees in Kerala including Rubber Park came under the purview of the said Regulation. As per the clause 5(g) and 6 of the said Regulation, the DISCOMs shall create a centralized energy accounting and audit cell comprising of the following members.

Sl. No.	Member details	Minimum Qualification Required
1	Nodal Officer	Every electricity distribution company shall designate a nodal officer, who shall be a full-time employee of the electricity distribution company in the rank of the Chief Engineer or above, for the purpose of reporting of the annual energy audit and periodic energy accounting and communicate the same to the Bureau
2	Energy Manager	Every designated consumer shall designate or appoint an Energy Manager having the minimum qualification specified in the Energy conservation (minimum qualification for energy managers) Rules 2006
3	IT Manager	Information technology manager, having professional experience of not less than five years
4	Financial Manager	Financial manager having professional experience of not less than five years

As the company is working with very limited number of staffs, the company had requested both BEE and their state designated agency Energy Management Centre (EMC) for exempting the small distribution licensees from the purview of the Regulation. However, EMC informed the company that they have no right to exclude any distribution licensees from the above notification, however, they may take up this matter with BEE for exempting small distribution licensees from annual energy auditing. EMC had also informed the company that it's not required to appoint a new permanent employee as Energy Manager and can outsource the BEE certified Energy Managers on contract basis. Since the regulation is statutory in nature and the first periodic auditing for the quarter ending September 2021 to be done by the energy manager by 6th December 2021, the company had carried out the following temporary arrangements for the year 2021-22.

Sl. No.	Member	Action taken	Additional Renumeration
1	Energy Manager	The company doesn't have any employee having the minimum qualification specified in the Energy conservation Rules 2006 to designate as Energy Manager. As such, the company had outsourced the qualified Energy Manager on contract professional service engagement basis from Kerala State Productivity Council.	Rs. 59000 /- for a quarter
2	Nodal Officer in the rank of Chief Engineer	The company is not having any designation such as Chief Engineer, Executive Engineer etc as in the case of state distribution utility. The company had designated the Manager-Technical of the company as the Nodal officer for reporting to BEE	
3	Information technology manager	The company had designated the Asst. Manager-Electrical of the company as the Information technology manager for in the energy accounting and audit cell of the company	
4	Financial manager	The company had designated the Chief Financial officer & Company secretary of the company as the financial manager in the energy accounting and audit cell of the company	

As detailed above, the company have to engage an Energy Manager Bureau of Energy Efficiency (Manner and Intervals for Conduct of Energy Audit in electricity distribution companies) Regulations, 2021 during the control period. The company humbly request that the Hon. Commission may kindly approve the additional cost of Energy Manager over and above the normative employee cost approved in the MYT Regulation.

4.4.1.2. Methodology adopted for arriving Employee Cost for the Control Period

The company had escalated the employee expenses from the year 2021-22 at the approved escalation rate of 4.454% in the KSERC MYT regulation 2021 for arriving the employee expenses for each year of the control period. The cost of Energy Manager is escalated at the rate of 4.454% in addition for the control period.

Employee Cost for the control period (Rs. in Lakhs)

The Employee Expenses for the control period is projected as follows.

Sl. No.	Particulars	Rs in Lakhs
A	General Employee cost Estimated for FY 2021-2022 (Excl. DA arrear)	83.98
B	DA Arrear actually paid (wef from 01/01/2019 to 31.03.2021)	7.66
C	Employee Cost Estimated for FY 2021-22 (A + B)	91.64

The company had escalated the employee expenses from the year 2021-22(excluding the DA arrears) at the approved escalation rate of 4.454% in the KSERC MYT regulation 2021 for arriving the employee expenses for each year of the control period.

Rs. In Lakhs

2021-22	2022-23	2023-24	2024-25	2025-26	2026-27
Estimated	Escalated (4.454%)	Escalated (4.454%)	Escalated (4.454%)	Escalated (4.454%)	Escalated (4.454%)
91.64	87.73	91.63	95.71	99.96	104.45

4.4.2. R&M Expenses

As stated in Employee Expenses, the BEE vide notification No. 18/1/BEE/DISCOM/2021 dated 06.10.2021 published **Bureau of Energy Efficiency (Manner and Intervals for Conduct of Energy Audit in electricity distribution companies) Regulations, 2021**. As per the said Regulation it is mandatory to carry out annual energy auditing by an accredited energy auditor. After this notification, all the distribution companies governed under various provisions of EC Act, are required to have its first energy audit conducted by an accredited energy auditor within 6 months i.e., by 6th April, 2022. The company had collected the offer from Kerala State Productivity Council for carrying out the annual energy auditing for the year 2021-22 and they had quoted Rs. 212400/-. As such, the R&M expenses for the control period is projected as follows.

R&M cost for the control period					
Year	2022-23	2023-24	2024-25	2025-26	2026-27
Normative R&M approved in MYT 2021	42.87	44.78	46.78	48.86	51.04
Energy Audit cost escalated at 4.454%	2.22	2.32	2.42	2.53	2.64
Total	45.09	47.1	49.2	51.39	53.68

4.4.3. A & G Expenses

The A&G expenses for the year 2021-22 is estimated based on the actual A&G expenses incurred till December 2021. The A& G expenses excluding Electricity Duty for the control period is projected on the basis of the A&G expenses estimated for the FY 2021-22. The expenses which are incurred exclusively for licensee business and 50% of the common expenses are considered for projecting the A&G expenses for the control period.

An escalation rate of 4.454% from the year 2021-22 is considered as in the KSERC MYT Regulation, 2021 has been used for projecting the A&G expenses for the control period.

	Rs. In lakhs							
	2019-20 (Actual)	2020-21 (Actual)	2021-22 (Estimated)	2022-23 (Projected)	2023-24 (Projected)	2024-25 (Projected)	2025-26 (projected)	2026-27 (Projected)
A&G Expenses	31.83	40.50	35.27	36.84	38.48	40.19	41.97	43.84
Ele Duty u/s3(1) KED Act	15.28	17.62	19.61	19.61	20.20	20.81	21.43	22.07
Total (Rs. Lakhs)	47.11	58.12	54.88	56.45	58.68	61.00	63.40	65.91

4.5. FIXED ASSETS AND DEPRECIATION.

The depreciation expenditure for each year of the Control Period has been computed in accordance with Regulation 27 of KSERC MYT Regulations, 2021 and also considering the asset-class wise depreciation rates as provided under the said Regulations.

The company has computed depreciation on straight line method specified in Annexure 1 to the MYT Regulations for the first 12 years from the date of commercial operation. The remaining depreciable value as on the 31st day of March of the financial year ending after a period of 12 years from the date of commercial operation is spread over the balance useful life of the assets.

Year	Depreciation projected (Rs.in Lakhs)
2021-22	34.07
2022-23	35.04
2023-24	35.67
2024-25	36.51
2025-26	36.08
2026-27	36.00

The depreciation of Building and Plant and Machinery included under 'Other Assets' which have completed 12 years is calculated on WDV method (Useful Life: 35 Years). The depreciation of the remaining assets under 'Other Assets' have been determined on straight line method as per the rate specified in MYT Tariff Regulations.

4.6.RETURN ON PAID UP EQUITY OR NET FIXED ASSETS.

The business of Rubber Park is entirely funded by the equity contribution from Kinfra and Rubber Board. The company has not availed any loans. The company had computed the return on equity based on the Regulation 28 of the **KSERC MYT Regulations, 2021**.

The company had computed the return on equity share capital at the rate of fourteen percent on the amount of equity share capital approved by the Commission for the assets put to use at the commencement of the financial year and on fifty percent of equity share capital portion of the capital cost for the investment put to use during the financial year. As such, the return on equity share capital computed for each year of the control period is tabulated as below.

Return on Paid up Equity for the year 2022-23

Figures in Rs.Lakhs

Equity at the beginning of the year	Additional Capital investment by way of Equity proposed for the year	50% of the equity proposed for the year	Total Equity for the calculation of RoE	30% of the Equity	RoE @ 14%
1106.49	12	6	1112.49	333.75	46.72

Return on Paid up Equity for the year 2023-24

Figures in Rs.Lakhs

Equity at the beginning of the year	Additional Capital investment by way of Equity proposed for the year	50% of the equity proposed for the year	Total Equity for the calculation of RoE	30% of the Equity	RoE @ 14%
1118.79	12	6	1124.79	337.44	47.24

Return on Paid up Equity for the year 2024-25

Figures in Rs.Lakhs

Equity at the beginning of the year	Additional Capital investment by way of Equity proposed for the year	50% of the equity proposed for the year	Total Equity for the calculation of RoE	30% of the Equity	RoE @ 14%
1130.79	13	6.5	1137.29	341.19	47.76

Return on Paid up Equity for the year 2025-26

Figures in Rs.Lakhs

Equity at the beginning of the year	Additional Capital investment by way of Equity proposed for the year	50% of the equity proposed for the year	Total Equity for the calculation of RoE	30% of the Equity	RoE @ 14%
1143.79	13.6	6.8	1150.59	345.18	48.33

Return on Paid up Equity for the year 2026-27

Figures in Rs.Lakhs

Equity at the beginning of the year	Additional Capital investment by way of Equity proposed for the year	50% of the equity proposed for the year	Total Equity for the calculation of RoE	30% of the Equity	RoE @ 14%
1157.39	14	7	1164.39	349.3	48.9

4.7. INTEREST ON NORMATIVE LOAN.

The business of Rubber Park is entirely funded by the equity contribution from Kinfra and Rubber Board. The company had not availed any loans. The company had computed the interest on normative loan based on the Regulation 29 of the **KSERC MYT Regulations, 2021**.

Sl. No.	Particulars (specify items)	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27
		Projected	Projected	Projected	Projected	Projected	Projected
1	2	9	10	11	12	13	14
1	Gross Normative loan - Opening	1,050.06	1,106.49	1,118.79	1,130.79	1,143.79	1,157.39
2	Net Additions during the Year	56.43	12.30	12.00	13.00	13.60	14.00
3	Net Additions during the year on pro- rata basis	28.22	6.15	6.00	6.50	6.80	7.00
4	70% Capital cost approved by Commission	754.79	778.85	787.35	796.10	805.41	815.07
5	Cumulative repayment of Normative Loan up to previous year	76.28	110.35	145.39	181.06	217.57	253.65

6	Net Normative loan - Opening	658.76	664.20	637.77	610.49	583.08	556.52
7	Increase/Decrease due to ACE/de- capitalization during the Year	28.22	6.15	6.00	6.50	6.8	7.00
8	Repayments of Normative Loan during the year	34.07	35.04	35.67	36.51	36.08	36.00
9	Net Normative loan - Closing	644.44	633.46	606.29	578.53	551.76	525.43
10	Average Normative Loan	651.60	648.83	622.03	594.51	567.42	540.98
11	Weighted average Rate of Interest of actual Loans	8.550	8.550	8.550	8.550	8.550	8.550
12	Interest on Normative loan	55.71	55.47	53.18	50.83	48.51	46.25

4.8. FINANCE CHARGES

The company had filed a petition before the Hon. Commission on 29-12-2015, seeking approval of the draft Power Purchase Agreement (PPA) to be entered into with K.S.E.B Ltd, for additional power of 2200kVA at 110kV (over and above contract demand of 4500kVA as per PPA dated 24/03/2015). The Hon. Commission had approved the same with some modifications and suggestions vide the order dated 17.02.2016.

The Hon. Commission had suggested in the order that the “*Article 8.9 and article 8.12 of the PPA stipulates for double security mechanism, i.e., one in the form of LC equivalent to 1.05 times the average billing demand and the second one in the form of security deposit equivalent to two months electricity charges. The Commission is of the opinion that, any one of the security mechanism shall be sufficient. Further, the bank charges for maintaining the LC and also the bank charges for providing bank guarantee for 50% of the security deposit are the expenses of the RPIPL and hence the same may reflect in the ARR and BST applicable to RPIPL. Further, the KSEB Ltd has also to provide interest at bank rate for the security deposit with KSEB Ltd in the form of cash or demand draft, which is an expense of the KSEB Ltd. Considering these factors, the petitioner RPIPL and the respondent KSEB Ltd may mutually discuss and arrive at a consensus on the issue, and modify the PPA accordingly. If KSEB Ltd insists for double security mechanism as provided in the draft PPA and the RPIPL agree for the same, the cost of providing the double security mechanism shall be allowed through the ARR of the RPIPL*”.

As suggested by Hon. Commission in the order, we had requested the KSEB Ltd to relax the double security mechanism proposed in the Article 8.9 and 8.12 of the PPA. However, KSEB Ltd had refused to relax the double security mechanism as suggested by the Hon. Commission in the order and insisted for the same for executing the PPA. Hence, we had provided both security deposit and opened LC in favor of KSEB Ltd before executing the Power Purchase Agreement. The company had projected the interest and finance charges at the escalation rate of 4.454% from the actual expenditure incurred during the year 2020-21. The interest and finance charges proposed for each year of the control period is tabulated below.

Finance & Bank Charges	Rs.Lakhs
For the year 2022-23	0.93
For the year 2023-24	0.98
For the year 2024-25	1.03
For the year 2025-26	1.08
for the year 2026-27	1.13

4.9. Tax on Returns

As per the Regulation 31 of the MYT Regulations 2021 “*The Commission shall provisionally approve the Income Tax payable for the appropriate years of the Control Period, if any, based on the permissible return on equity share capital or return on net fixed assets, as approved by the Commission relating to the generating business/ company or transmission business/ licensee or distribution business/ licensee or the State Load Despatch Centre, as the case may be and included in the Aggregate Revenue Requirements:*” In FY 2019-20 and 2020-21, the income tax paid was apportioned on the basis of ratio between ‘Profit before tax as per audited P&L Statement’ and ‘ROE’ for arriving the tax on returns. The net profit for the year 2020-21 according to the statement of the profit and loss account of the company prepared for the purpose of statutory audit is Rs 306.99 lakhs. The company has paid a total of Rs 112.69 lakhs as income tax based on the Net profit of the company for the year 2020-21. The ROE arrived for the year 2020-21 is Rs. 43.94 Lakhs. On the basis of the above, tax on return for the year 2020-21 has been taken in the ratio of ROE to Net profits (14.31) which amounts to Rs.16.13 lakhs.

Return on Equity for the FY 2020-21	Tax on Return for the FY 2020-21	Tax on return as a percentage of ROE
43.94	16.13	36.71

The tax on return for the year 2020-21 is 36.71% of the Return on equity claimed for the year. In order to project the tax on return for the control period, the company had considered the percentage of tax on return to the ROE claimed for the year 2020-21.

Year	ROE Claimed	Tax on ROE (Rs. Lakhs) (36.71% of ROE)
For the year 2022-23	46.72	17.15
For the year 2023-24	47.24	17.34
For the year 2024-25	47.76	17.53
For the year 2025-26	48.33	17.74
for the year 2026-27	48.90	17.95

5. EXPECTED REVENUE FROM CHARGES.

5.1. REVENUE FROM SALE OF POWER.

The company had projected the expected revenue from sale of power based on the energy sales forecasted for each tariff category of consumers in Para 4.01.04 as per the present Retail Supply Tariff prevailing in the state.

The tariff category wise expected revenue from sale of power as per the existing Retail Supply for each year of the control period is tabulated as below. The Power factor incentive/penalty was projected based on the actual power factor incentive/penalty incurred during the year 2020-21. The power factor incentive/penalty given to the HT consumers was 1.39% of the Energy charges and that for LT industrial consumers was 0.42% of the energy charges.

Revenue from sale of Power for the year 2022-23

Tariff Category	Number of Consumers	Connected Load (kVA/KW)	Units Sold (Mu)	Demand Charge (Rs.in Lakhs)	Energy Charge (Rs.in Lakhs)	PF Incent/penalty (Rs.in Lakhs)	Total (Rs.in Lakhs)
LT-IV A	23	1445	2.537	29.48	145.90	-0.61	174.77
LT VI B	1	35	0.007	0.29	0.41		0.7
LT VI F	2	25.94	0.093	0.37	8.34		8.71
LT VII A	17	147	0.267	2.42	19.75		22.17
LT Street Light	6		0.031	0.04	1.35		1.38
HT-1A	20	8715	29.864	266.68	1717.20	-23.87	1960.01
Total							2167.75

Revenue from sale of Power for the year 2023-24

Tariff Category	Number of Consumers	Connected Load (kVA/KW)	Units Sold (Mu)	Demand Charge (Rs.in Lakhs)	Energy Charge (Rs.in Lakhs)	PF Incent/penalty (Rs.in Lakhs)	Total (Rs.in Lakhs)
LT-IV A	24	1445	2.61	31.01	150.28	-0.63	180.66
LT VI B	1	35	0.007	0.29	0.41		0.7
LT VI F	2	25.94	0.093	0.37	8.34		8.71
LT VII A	17	147	0.267	2.42	19.75		22.17
LT Street Light	6		0.031	0.04	1.35		1.38
HT-1A	22	8715	29.864	266.68	1717.20	-23.87	2023.05
Total							2236.68

Revenue from sale of Power for the year 2024-25

Tariff Category	Number of Consumers	Connected Load (kVA/KW)	Units Sold (Mu)	Demand Charge (Rs.in Lakhs)	Energy Charge	PF Incent/penalty (Rs.in Lakhs)	Total (Rs.in Lakhs)
					(Rs.in Lakhs)		
LT-IV A	25	1595	2.69	32.54	154.79	-0.65	186.68
LT VI B	1	35	0.007	0.29	0.41		0.70

LT VI F	2	25.942	0.093	0.37	8.34		8.71
LT VII A	17	147	0.267	2.42	19.75		22.17
LT Street Light	6	0	0.031	0.04	1.35		1.38
HT-1A	24	9515	31.683	291.16	1821.78	-25.32	2087.61
Total							2307.26

Revenue from sale of Power for the year 2025-26

Tariff Category	Number of Consumers	Connected Load (kVA/KW)	Units Sold (Mu)	Demand Charge (Rs.in Lakhs)	Energy Charge	PF Incent/penalty	Total
					(Rs.in Lakhs)	(Rs.in Lakhs)	(Rs.in Lakhs)
LT-IV A	27	1745	2.77	35.60	159.43	-0.67	194.36
LT VI B	1	35	0.007	0.29	0.41		0.70
LT VI F	2	25.942	0.093	0.37	8.34		8.71
LT VII A	17	147	0.267	2.42	19.75		22.17
LT Street Light	6	0	0.031	0.04	1.35		1.38
HT-1A	26	9915	32.634	303.40	1876.43	-26.08	2153.75
Total							2381.08

Revenue from sale of Power for the year 2026-27

Tariff Category	Number of Consumers	Connected Load (kVA/KW)	Units Sold (Mu)	Demand Charge (Rs.in Lakhs)	Energy Charge	PF Incent/penalty	Total
					(Rs.in Lakhs)	(Rs.in Lakhs)	(Rs.in Lakhs)
LT-IV A	27	1745	2.86	35.60	164.22	-0.69	199.13
LT VI B	1	35	0.167	0.29	0.41		0.70
LT VI F	2	25.942	0.093	0.37	8.34		8.71
LT VII A	17	147	0.267	2.42	19.75		22.17
LT Street Light	6	0	0.031	0.04	1.35		1.38
HT-1A	26	9915	33.613	303.40	1932.72	-26.86	2209.26
Total							2441.36

5.2. NON-TARIIF INCOME.

The company had estimated the non-tariff income for the year 2021-22 based on the actual non-tariff income received up to December 2021. The major portion of the non-tariff income is interest income. The interest rates are showing decreasing trend for the past few years and hence the company has forecasted the same non-tariff income for the control period. The non-tariff income projected for each year of the control period is tabulated below.

Year	Non tariff income (Rs.Lakhs)	Remarks
2021-22	2.01	Estimated
2022-23	2.01	Projected
2023-24	2.01	Projected
2024-25	2.01	Projected
2025-26	2.01	Projected
2026-27	2.01	Projected

5.3. INCOME FROM WHEELING CHARGES.

The consumer of KSEB Ltd M/s. M Fuels had taken open access through the distribution network of Rubber Park. The company had estimated the income from wheeling charge for the year 2021-22 based on the actual wheeling charge received up to December 2021. The same level of energy and wheeling charges are projected for the control period.

Year	Energy Wheeled (MU)	Wheeling Charge (Rs.Lakhs)	Remarks
2021-22	0.347	1.909	Estimated
2022-23	0.347	1.909	Projected
2023-24	0.347	1.909	Projected
2024-25	0.347	1.909	Projected
2025-26	0.347	1.909	Projected
2026-27	0.347	1.909	Projected

6. REVENUE SURPLUS/DEFICIT

The summary of the ARR&ERC projection for each year of the control period is tabulated as follows.

Sl No	Particulars	2022-23	2023-24	2024-25	2025-26	2026-27
1.	Purchase of power	1861.82	1928.26	1996.12	2068.50	2119.93
2	Repairs and maintenance	45.09	47.10	49.20	51.39	53.68
3	Employee cost	87.73	91.63	95.71	99.96	104.45
4	Admin & general expenses	56.45	58.68	61	63.4	65.91
5	Depreciation	35.04	35.67	36.51	36.08	36.00
6	Finance & Bank charges	0.93	0.98	1.03	1.08	1.13
7	Return on Equity	46.72	47.24	47.76	48.33	48.90
8	Interest on Normative Loan	55.47	53.18	50.83	48.51	46.25
9	Tax on ROE	17.15	17.34	17.53	17.74	17.95
9	Total expenses	2206.41	2280.09	2355.70	2431.99	2494.20
10	Revenue from Sale of power	2167.75	2236.68	2307.26	2381.08	2441.36
12	Wheeling income &Other income	3.92	3.92	3.92	3.92	3.92
13	Surplus/deficit	-34.74	-39.49	-44.52	-49.99	-48.92

8. PRAYER

Rubber Park prays to the Hon. Commission that

- (a) The accompanying petition for the approval of Aggregate Revenue Requirement and determination of tariff for each year of the Control Period as per the KSERC MYT Tariff Regulations 2021 may kindly be approved.
- (b) The bulk supply tariff of Rubber Park may suitably fix to bridge the revenue gap projected in the petition.
- (c) Kindly fix the bulk supply tariff for RPO from the buyer licensee.
- (c) To permit Rubber Park to present the case in person and submit other details / information as may be necessary before the Commission to enable to take a final decision on the matter.

Managing Director

Rubber Park India (P) Ltd,
Valanchirangara,
Ernakulam Dist.