

BEFORE

JOINT ELECTRICITY REGULATORY COMMISSION

FOR THE STATE OF GOA AND UNION TERRITORIES

GURUGRAM

PETITION

FOR

APPROVAL OF

TRUE-UP OF FY 2024-25

BY



ELECTRICITY DEPARTMENT
Government of GOA

NOVEMBER 2025

BEFORE THE JOINT ELECTRICITY REGULATORY COMMISSION FOR THE STATE OF GOA, & UNION
TERRITORIES, GURUGRAM

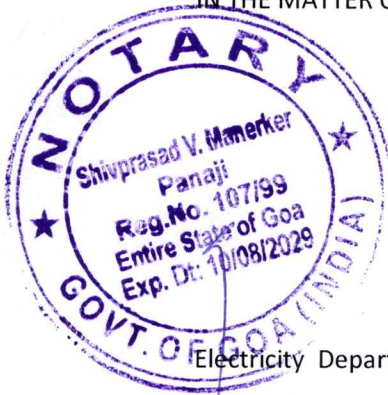
Filing No.....

Case No.....

IN THE MATTER OF: Petition for approval of True-Up of FY 2024-25

AND

IN THE MATTER OF: Electricity Department, Government of Goa Petitioner
Vidyut Bhavan, Panaji, Goa



Electricity Department, Government of Goa (hereinafter referred to as "ED-Goa"), files the petition for approval of True-Up of FY 2024-25 for the Electricity Department of Goa under section 45, 46, 61, 62, 64 and 86 of the Electricity Act, 2003 (EA 2003).

BEFORE THE JOINT ELECTRICITY REGULATORY COMMISSION FOR THE STATE OF GOA, & UNION TERRITORIES, GURUGRAM

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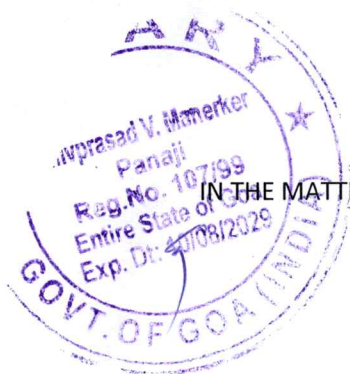
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IN THE MATTER OF: Electricity Department, Government of Goa

Vidyut Bhavan, Panaji, Goa

.....Petitioner



AFFIDAVIT VERIFYING THE PETITION

I, Shri. Stephen Fernandes, son of Shri. Roque Fernandes aged 47 years, the deponent named above do hereby solemnly affirm and state on oath as under:

1. I am the Chief Electrical Engineer and Head of the Electricity Department, Government of Goa. I am authorized to sign and submit this petition and have knowledge of the facts stated below.
2. I say that on behalf of ED-Goa, I am now filing this petition under The Electricity Act 2003, for approval of True-Up of FY 2024-25.
3. I further say that the statements made, and financial data presented in the aforesaid Petition are as per records of the Department and believe that to be true to the best of my knowledge.

4. Further, to my knowledge and belief, no material information has been concealed in the aforesaid Petition.

The Electricity Department,
Government of Goa



DEPONENT

Place: Panaji, Goa

Dated: 28 November 2025

VERIFICATION

I, Shri Shivprasad V. Mamerker Advocate and Notary having office at Panaji-Goa, do hereby declare that the person making this affidavit is known to me through the perusal of records and I am satisfied that he is the same person alleging to be deponent himself.



Advocate

Solemnly affirmed before me on this 28 day of November 2025 by the deponent who has been identified by the aforesaid Advocate. I have satisfied myself by examining the deponent that he understood the contents of the affidavit which has been read over and explained to him. He has also been explained about section 193 of Indian Penal Code that whoever intentionally gives false evidence in any of the proceedings of the Commission or fabricates evidence for purpose of being used in any of the proceedings shall be liable for punishment as per law.



SOLEMNLY AFFIRMED AND VERIFIED
BEFORE ME BY Stephens

Finance Chief

REG. No. 8581 DATED 22/11/2011

Shivprasad V. Saherke
NOTARY AT PANAJI
GOVT. STATE OF GOA

Elab Dept



BEFORE THE JOINT ELECTRICITY REGULATORY COMMISSION FOR THE STATE OF GOA, & UNION TERRITORIES, GURUGRAM

Filing No.....

Case No.....

IN THE MATTER OF: Petition for approval of True-Up of FY 2024-25.

AND

IN THE MATTER OF: Electricity Department, Government of GoaPetitioner
Vidyut Bhavan, Panaji, Goa

PETITION UNDER SECTIONS 45, 46, 61, 62 AND 64 OF THE ELECTRICITY ACT, 2003 FILES FOR INITIATION OF PROCEEDINGS BY THE HON'BLE COMMISSION FOR DECIDING ON THE MATTERS CONCERNING THE PETITION FOR APPROVAL OF TRUE-UP OF FY 2024-25.



The Petitioner respectfully submits as under: -

1. The Petitioner, Electricity Department - Goa (ED-Goa) is deemed Distribution Licensee for the State of Goa.
2. Pursuant to the enactment of the Electricity Act, 2003, ED-Goa is required to submit its True-up, Annual Performance Review, Annual Revenue Requirement, and, Tariff Petition as per the procedures outlined in section 61, 62 & 64 of EA 2003, and in accordance with the provisions of JERC (Generation, Transmission and Distribution Multi Year Tariff) Regulations, 2021 (MYT Regulations, 2021).
3. ED-Goa hereby submits the petition for approval of True-up of FY 2024-25 which is in line with the principles laid by the Hon'ble Commission contained in the MYT Tariff Regulations 2021.

4. ED-Goa hereby submits the Tariff Formats for the True-up of FY 2024-25 attached in the **Annexure-1**.
5. ED-Goa hereby submits the document of Budgetary Support assurance from the Government of Goa for the True-up of FY 2024-25.
6. ED-Goa prays to the Hon'ble Commission to admit the attached petition for approval of True-Up of FY 2024-25.

The Petitioner respectfully prays that the Hon'ble Commission may:

- a) Accept and admit the petition for True-up of FY 2024-25 which is in line with the principles laid by the Hon'ble Commission contained in the MYT Tariff Regulations 2021;
- b) Accept and admit the Tariff Formats attached in **Annexure-1** of this petition for the True-up of FY 2024-25.
- c) Approve the actual Revenue gap for FY 2024-25 as per the True-up exercise.
- d) Pass suitable orders with respect to True-up of FY 2024-25 for the expenses to be incurred by ED-Goa for serving its consumers;
- e) Grant any other relief as the Hon'ble Commission may consider appropriate;
- f) The Petitioner craves leave of the Hon'ble Commission to allow further submission, addition and alteration to this petition as may be necessary from time to time;
- g) Condone any inadvertent omissions/errors/shortcomings and permit ED-Goa to add/change/ modify/ alter this filing and make further submissions as may be required at a future date;
- h) To pass any other Order as the Hon'ble Commission may deem fit and appropriate under the circumstances of the case and in the interest of justice.



Electricity Department,
Government of Goa

Petitioner

Place: Panaji, Goa

Dated: 28 November 2025

Stephen Fernandes
Chief Electrical Engineer



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1 INTRODUCTION

1.1 Preamble

The Hon'ble Commission has notified JERC (Generation, Transmission and Distribution Multi Year Tariff) Regulations, 2021. In line with the same, the Electricity Department of Goa (herein referred to as ED-Goa) submits this Petition for True-up of FY 2024-25, as per the provisions of the abovesaid Tariff Regulations.

1.2 Background: Electricity Department of Goa

The ED-Goa was formed in January 1963 under the Government of Goa, Daman & Diu. It is the only licensee operating in the State of Goa for transmission and distribution of Electrical Energy. The Electricity Department of Goa does not have its own generation. Most of the power requirement for the State of Goa is met through its share from Central Sector Power Stations of NTPC Ltd as allocated by the Central Government.

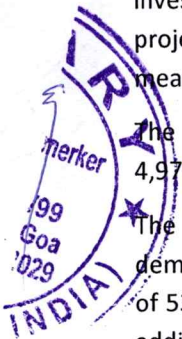
ED-Goa came into regulatory regime w.e.f. FY 2011-12 i.e. the first tariff filing year. The Electricity Department is a deemed Distribution Licensee within the meaning of Section 2 (17) of Electricity Act 2003 and pursuant to the Section 14 of the Electricity Act. Further, Section 42 and 43 of the Electricity Act 2003 prescribes the following duties of the deemed Distribution Licensee:

- To develop and maintain an efficient, co-ordinated and economical distribution system;
- To supply electricity on an application of the consumer in accordance with the provisions specified in the Electricity Act 2003;
- To provide non-discriminatory open access to the consumers;
- To establish a forum for redressal of grievances of the consumers.

The main purpose is to undertake the transmission, distribution and retail supply of electricity in its license area and for this purpose to plan, acquire, establish, construct, erect, lay, operate, run, manage, maintain, enlarge, alter, renovate, modernize, automate, work and use a power system network in all its aspects and also to carry on the business of purchasing, selling, importing of electrical energy, including formulation of tariff, billing and collection thereof and then to study, investigate, collect information and data, review operations, plan, research, design and prepare project reports, diagnose operational difficulties and weaknesses and advise on the remedial measures to improve and modernize existing sub-transmission and supply lines and sub-stations.

The ED-Goa caters to around 7.23 Lakh consumers with an annual energy consumption of approx. 4,970.28 MU in FY 2024-25.

The peak demand of Goa during FY 2024-25 was around 815 MW (March 2025). 100% of the power demand was met for the State of Goa during FY 2024-25. ED-Goa is currently receiving firm power of 533.96 MW (433.96 MW from the Western Region and 100 MW from the Southern Region). In addition, the department also purchases power from Co-generation stations within state and short-term and long-term power procurement from the market and traders.





1.3 Filing in the current Petition

ED-Goa submits that the department had filed the petition (Petition No. 115/2023) before the Hon'ble Commission for the approval of the ARR projection for FY 2024-25, pursuant to which the Hon'ble Commission issued its order on 13th June 2024. The department is now filing the present petition for the approval of the true-up of FY 2024-25 based on the actual figures.

ED-Goa hereby submits that the accounts of FY 2024-25 have been audited by CAG. Accordingly, ED-Goa has considered the actual numbers for FY 2024-25 in this petition for the True-up petition for FY 2024-25.

1.4 Overall approach for present filing

The Hon'ble Commission had notified JERC (Generation, Transmission and Distribution Multi Year Tariff) Regulations 2021 on March 2021.

In line with the above mentioned JERC MYT Regulations 2021, the ED-Goa is filing True-up petition for FY 2024-25.

ED-Goa is filing this True-up petition for the FY 2024-25 based on the actual performance during the year and taking into consideration the approved figures by the Hon'ble Commission vide its Tariff Order dated 13th June, 2024.





2 TRUE-UP OF FY 2024-25

The Hon'ble Commission through its directives had directed the Petitioner to file True-ups based on audited accounts in a timely manner.

Complying with the directives, the ED-Goa hereby submits the True-up Petition for FY 2024-25 in line with the MYT Regulations 2021, before the Hon'ble Commission. The Financial Accounts for FY 2024-25 are completed and the Audit is finalised by the CAG and the certificate for the same is awaited.

The ED-Goa has considered the numbers approved in Tariff Orders as well as the actual numbers from the Annual accounts of FY 2024-25 for the purpose of the Truing-up of FY 2024-25.

2.1 Energy Sales

The Category-wise approved and actual Energy Sales for FY 2024-25 is shown in the table below:

Table 2-1: Energy Sales for FY 2024-25 (MUs)

S/No	Category of Consumer	Approved in T.O dated 13 th June 2024	Actual FY 2024-25
A. LOW TENSION SUPPLY			
1.	LTD/Domestic	1,479.76	1,535.98
2.	LT-LIG (Low Income Group)	0.94	0.87
3.	LTC/Commercial	503.47	599.38
4.	LTI/ Industrial	89.98	90.24
5.	LT Mixed/ LT-P Hotel Industries	4.43	3.17
6.	LTAG/LT-AGP (Pump Sets/Irrigation)	17.63	17.49
7.	LTAG/LT-AGA (Allied Activities)		1.64
8.	LTPL Public lighting	111.02	59.32
9.	LT Hoarding /Sign Board	0.24	0.07
B. HIGH TENSION SUPPLY			
10.	HTD Domestic	0.38	0.43
11.	HT-Commercial	199.10	210.95
12.	HT-Commercial (Green Consumer)	-	8.93
13.	HTI/Industrial – Connected at 11/33 kV	1,788.40	1,485.78
14.	HTI/Industrial – Connected at 110 kV		276.52
15.	HTI/Industrial – Connected at 11/33 kV (Green Consumer)	-	0.25
16.	HTFS Industrial (Ferro Metallurgical/ Steel Melting/ Power Intensive/Steel Rolling)	549.01	508.82
17.	HTAG/HT-AGP (Pump Sets/Irrigation)	26.27	5.44
18.	HTAG/HT-AG (Allied Activities)		17.03
19.	HTMES/Defence Establishment	33.07	37.52
C. TEMPORARY SUPPLY			
20.	LT-Temporary Domestic	30.50	4.01



Stephen Fernandes
Chief Electrical Engineer



S/No	Category of Consumer	Approved in T.O dated 13 th June 2024	Actual FY 2024-25
21.	LT-Temporary Commercial		31.46
22.	HT-Temporary	16.15	5.57
D. SINGLE POINT SUPPLY			
23.	Residential Complexes	-	-
24.	Commercial Complexes	5.48	6.06
25.	Industrial Complexes	-	-
E. OTHER CATEGORIES			
26.	High Tension Railway Traction/HT-R – Connected at 110/220 kV	-	53.01
27.	EV Charging Stations (LT)	5.04	7.58
28.	EV Charging Stations (HT)		2.76
Total		4,860.87	4,970.28

The Hon'ble Commission is requested to approve the actual Sales figures considered for True-up of FY 2024-25.

2.2 Number of Consumers

The Category-wise approved and actual consumers for FY 2024-25 is shown in the table below:

Table 2-2: Number of Consumers for FY 2024-25 (Nos.)

S/No	Category of Consumer	Approved in T.O dated 13 th June 2024	Actual FY 2024-25
A. LOW TENSION SUPPLY			
1.	LTD/Domestic	5,81,459	5,75,920
2.	LT-LIG (Low Income Group)	873	560
3.	LTC/Commercial	1,13,166	1,13,463
4.	LTI/ Industrial	5,592	5,326
5.	LT Mixed/ LT-P Hotel Industries	116	137
6.	LTAG/LT-AGP (Pump Sets/Irrigation)	13,493	12,912
7.	LTAG/LT-AGA (Allied Activities)		361
8.	LTPL Public lighting	26,734	6,819
9.	LT Hoarding /Sign Board	67	88
B. HIGH TENSION SUPPLY			
10.	HTD Domestic	4	5
11.	HT-Commercial	373	381
12.	HT-Commercial (Green Consumer)	-	1
13.	HTI/Industrial – Connected at 11/33 kV	848	814
14.	HTI/Industrial – Connected at 110 kV		5



S/No	Category of Consumer	Approved in T.O dated 13 th June 2024	Actual FY 2024-25
15.	HTI/Industrial – Connected at 11/33 kV (Green Consumer)	-	3
16.	HTFS Industrial (Ferro Metallurgical/ Steel Melting/ Power Intensive/Steel Rolling)	23	22
17.	HTAG/HT-AGP (Pump Sets/Irrigation)	49	46
18.	HTAG/HT-AG (Allied Activities)		3
19.	HTMES/Defense Establishment	15	16
C. TEMPORARY SUPPLY			
20.	LT-Temporary Domestic	5,853	2,357
21.	LT-Temporary Commercial		4,461
22.	HT-Temporary	44	20
D. SINGLE POINT SUPPLY			
23.	Residential Complexes	-	-
24.	Commercial Complexes	1	1
25.	Industrial Complexes	-	-
E. OTHER CATEGORIES			
26.	High Tension Railway Traction/HT-R – Connected at 110/220 kV	-	3
27.	EV Charging Stations (LT)	4	26
28.	EV Charging Stations (HT)		5
Total		7,48,713	7,23,710

The Hon'ble Commission is requested to approve the actual number of consumers considered in the table above for True-up of FY 2024-25.

2.3 Connected Load

The Category-wise approved and actual load for FY 2024-25 is shown in the table below:

Table 2-3: Connected Load for FY 2024-25 (kW)

S/No	Category of Consumer	Approved in T.O dated 13 th June 2024	Actual FY 2024-25
A. LOW TENSION SUPPLY			
1.	LTD/Domestic	19,87,816.64	20,76,860.76
2.	LT-LIG (Low Income Group)	100.00	83.58
3.	LTC/Commercial	4,74,613.96	5,51,403.02
4.	LTI/ Industrial	1,14,727.00	1,11,796.55
5.	LT Mixed/ LT-P Hotel Industries	2,328.00	2,588.62
6.	LTAG/LT-AGP (Pump Sets/Irrigation)	37,871.00	37,321.76
7.	LTAG/LT-AGA (Allied Activities)		1,847.93



S/No	Category of Consumer	Approved in T.O dated 13 th June 2024	Actual FY 2024-25
8.	LTPL Public lighting	36,000.41	17,648.04
9.	LT Hoarding /Sign Board	496.00	543.04
B. HIGH TENSION SUPPLY			
10.	HTD Domestic	423.85	450.90
11.	HT-Commercial	1,30,874.78	1,24,773.17
12.	HT-Commercial (Green Consumer)	-	2,700.00
13.	HTI/Industrial – Connected at 11/33 kV	5,87,938.13	4,78,008.75
14.	HTI/Industrial – Connected at 110 kV		50,220.00
15.	HTI/Industrial – Connected at 11/33 kV (Green Consumer)	-	954.00
16.	HTFS Industrial (Ferro Metallurgical/ Steel Melting/Power Intensive/Steel Rolling)	5,87,938.13	1,04,265.00
17.	HTAG/HT-AGP (Pump Sets/Irrigation)	14,700.77	11,079.00
18.	HTAG/HT-AG (Allied Activities)		3,447.00
19.	HTMES/Defence Establishment	8,053.44	8,932.50
C. TEMPORARY SUPPLY			
20.	LT-Temporary Domestic	28,284.43	7,671.29
21.	LT-Temporary Commercial		37,785.15
22.	HT-Temporary	10,532.09	4,487.31
D. SINGLE POINT SUPPLY			
23.	Residential Complexes	-	-
24.	Commercial Complexes	2,400.00	2,250.00
25.	Industrial Complexes	-	-
E. OTHER CATEGORIES			
26.	High Tension Railway Traction/HT-R – Connected at 110/220 kV	-	23,400.00
27.	EV Charging Stations (LT)	209.60	433.90
28.	EV Charging Stations (HT)		5,320.80
Total		35,51,846.92	36,26,272.99

The Hon'ble Commission is requested to approve the actual values of connected load considered in the table above for True-up of FY 2024-25.

2.4 Inter-State Transmission Loss for FY 2024-25

The actual Inter-State Transmission loss for FY 2024-25 is provided in the below table. The Hon'ble Commission is requested to approve the same.


Stephen Fernandes
Chief Electrical Engineer



Table 2-4: Inter-State Transmission Loss for FY 2024-25

Particulars	Approved in T.O dated 13 th June 2024	Actual FY 2024-25
Inter-State Transmission Loss	4.02%	3.91%

2.5 Intra-State Transmission & Distribution (T&D) Loss for FY 2024-25

The actual Intra-State Transmission & Distribution (T&D) Loss for FY 2024-25 is provided in the below table. The Hon'ble Commission is requested to approve the same.

Table 2-5: Intra-State T&D Loss for FY 2024-25

Particulars	Approved in T.O dated 13 th June 2024	Actual FY 2024-25
Intra-State T&D Loss	7.95%	7.44%

2.6 Energy Balance for FY 2024-25

ED-Goa while computing Energy balance for entire FY 2024-25 has considered the actual of UI Over-Drawal / Under-Drawal, Purchase from Traders, Sale to Exchange, etc.

Table 2-6: Energy Balance for FY 2024-25

S/No	Item	Actual FY 2024-25 (MUs)
1.	Energy Input at Goa Periphery	5,251.70
2.	Total Power Scheduled/ Purchased	
	Total Scheduled Billed Drawal – CGS	4,318.16
	Add: Power purchase from NVVN / Banking	72.14
	Add: Power purchase from Traders/ Open Market	451.58
	Add: Renewable Power	827.19
	Less: Power diverted to Exchange	231.69
	Less: Power Sell through Trader	-
	Total	5,437.37
3.	PGCIL Losses – MUs	213.70
	PGCIL Losses - %	3.91%
4.	Add: Overdrawal	51.46
	Less: Underdrawal	14.98
5.	Total Power Purchased within Goa State	





S/No	Item	Actual FY 2024-25 (MUs)
	Add: Co-generation	109.58
	Add: Hindustan Waste Treatment Plant	3.75
	Add: Vasudha Waste Treatment Plant	2.28
	Add: RE capacity within State (including Net-metering)	2.43
	Total	118.04
5.	Total Power Purchased	5,583.44
6.	Total Power Purchase availability after PGCIL Losses	5,369.74
	Power Purchase required at Goa periphery (MU)	5,369.74
7.	Retail Sales to Consumers	4,970.28
8.	Distribution Losses – MUs	399.46
	Distribution Losses - %	7.44%

2.7 Power Purchase Quantum & Cost for FY 2024-25

ED-Goa meets its total energy requirement from its allocation from the Central Sector Generating Stations (CGS) i.e., NTPC, NPCIL, etc., and Co-generating Company i.e., Vedanta Plant-1, Vedanta Plant-2, and Goa Sponge & Power Limited as per allocation from time to time. ED-Goa also meets a part of its energy requirement through purchase of Short-term power from Traders and Power Exchanges. Also, Renewable Power is procured from NVVN Ltd, SECI, APPCPL, Solar Net-Metering, Hindustan Waste Treatment Plant, and Vasudha Waste Treatment Plant.

The cost for purchase from NTPC plants also includes installments towards payment of supplementary bills raised by NTPC towards revision of tariffs of its plants. Further, the cost of purchase from NPCIL plant KAPS 1&2 also includes the 11th and 12th installments towards Debit note raised towards tariff revisions.

The Unscheduled Interchange (UI) charges are paid or received as per the overdrawal or underdrawal, the reactive charges, congestion charges and the Payment towards Net deviation and Ancillary services deficit.

ED-Goa also has the provision for Banking of Power through traders.

During peak summer hours, Goa faces power shortfall, which are primarily addressed by purchasing power through IEX across various segments like DAM, RTM, GDAM, TAM, etc. Further, the ED-Goa purchased Renewable Energy Certificates (RECs) to fulfil minor deficit in Renewable Purchase Obligation (RPO). Same are further detailed in the next section of this chapter.

The Transmission Charges comprises transmission charges paid to Western Region, Southern Region, and POSOCO fee and charges, and Open Access charges.

The Power Purchase cost also includes Cess, Incentives, Supplementary Charges, etc. and the same



are considered on actual basis.

Further, ED-Goa submits that the Regulation 34 of JERC MYT Regulations, 2021 specifies that:

"34.1 The rebate to be provided by a Generating Company or Transmission Licensee to a Distribution Licensee for early payment of bills shall be in accordance with the prevalent CERC Tariff Regulations.

34.2 Such rebate earned by the Distribution Licensee shall be considered under Non-Tariff Income for the Distribution Licensee.

34.3 Any rebate provided by the Generating Company or Transmission Licensee to the beneficiaries shall not be allowed as an expense for the Generating Company or Transmission Licensee, as the case may be."

In view of the above, ED-Goa submits that the department pays the Power Purchase bills upfront to avail the rebate as per the norms in the bills generated. Such rebate earned by ED-Goa has been considered under Non-Tariff Income and the same has been deducted from the overall revenue requirement for the FY 2024-25.

The details of source-wise monthly power purchase quantum, cost, and rebates with the supporting bills are provided along with this petition (attached in **Annexure-2**).

The table below shows the summary of the actual Power Purchase quantum from various sources along with their costs for FY 2024-25 including Transmission Charges, UI charges and purchase from traders:

Table 2-7: Power Purchase Quantum & Cost for FY 2024-25

S/No	Source	Approved in T.O dated 13 th June 2024		Actual FY 2024-25	
		Quantum (MUs)	Total Cost (Rs. Crore)	Quantum (MUs)	Total Cost (Rs. Crore)
A)	NTPC	3,990.34	1,272.25	3,952.67	1,433.48
1.	KSTPS	1,747.91	346.78	1,643.33	378.11
2.	VSTPS-I	292.39	73.79	249.13	72.84
3.	VSTPS-II	119.47	27.91	107.90	28.65
4.	VSTPS-III	103.76	25.43	98.95	27.14
5.	VSTPS-IV	123.04	38.57	124.98	42.90
6.	VSTPS-V	58.58	18.90	58.78	20.43
7.	KGPP	59.75	79.35	-	7.96
8.	GGPP	61.13	9.75	-	9.55
9.	SIPAT-I	217.52	54.07	210.78	62.87
10.	KSTPS-III (Unit- 7)	55.82	12.84	49.46	12.81
11.	RSTPS	481.61	248.43	710.58	334.75
12.	SIPAT-II	97.77	22.90	98.43	27.30
13.	Solapur	103.66	68.84	89.09	91.93
14.	Gadarwara	107.15	63.30	124.50	72.41
15.	Lara	98.26	32.13	109.05	38.58
16.	Khargone	84.95	53.78	85.95	61.33

ARK
V. Manerker
107/99
10/08/2029
GOA (INDIA)



S/No	Source	Approved in T.O dated 13 th June 2024		Actual FY 2024-25	
		Quantum (MUs)	Total Cost (Rs. Crore)	Quantum (MUs)	Total Cost (Rs. Crore)
17.	Mauda I	77.09	41.12	82.37	47.76
18.	Mauda II	100.48	54.39	109.39	60.91
	Add/Less: Other Adjustments	-	-	-	35.25
B)	NPCIL	223.30	85.95	365.49	155.17
1.	KAPS 1&2	112.30	42.22	116.53	43.75
2.	KAPS 3&4	44.48	20.16	135.36	60.01
3.	KAPS 1&2 (Adjustment)	-	-	-	11.40
4.	TAPS	66.52	23.57	113.60	40.02
C)	Traders	-	-	219.89	250.46
1.	IEX Purchase and Sales	-	-	84.10	135.51
	A) IEX Purchase	-	-	315.78	168.88
	B) IEX Sales	-	-	231.69	33.37
2.	Traders Drawal	-	-	135.79	126.52
	Traders Injection	-	-	-	11.56
D)	Net UI	-	-	36.48	58.82
	Over Drawal	-	-	51.46	61.62
	Under Drawal	-	-	14.98	2.81
E)	Banking of Power	-	-	72.14	0.44
	Drawal	-	-	88.04	0.44
	Injection	-	-	15.91	-
F)	Within State Generations				
1.	Co-Generation	129.18	31.53	109.58	26.04
	Vedanta Plant-1, Amona	57.98	14.27	57.01	13.55
	Vedanta Plant (I), Amona	-	-	50.60	11.96
	PTC India Ltd, New Delhi (GEPL)	-	-	6.41	1.58
	Goa Sponge & Private limited	5.18	1.28	3.32	0.80
	Vedanta Plant-2	66.03	15.98	49.26	11.70
G)	Renewable Sources	1107.25	386.33	827.19	365.54
1.	Solar	332.45	166.61	175.26	91.37
	NVVNL Solar	13.42	7.38	11.48	6.31
	Solar STOA	218.70	111.54	113.39	57.83
	SECI Solar	50.33	29.74	47.97	26.38
	Net Metering	-	-	2.43	0.84
	PM KUSUM	50.00	17.95	-	-
2.	Non-Solar	774.80	219.72	651.93	274.18
	SECI Wind Tranche II LTOA	139.46	37.79	132.01	35.77





S/No	Source	Approved in T.O dated 13 th June 2024		Actual FY 2024-25	
		Quantum (MUs)	Total Cost (Rs. Crore)	Quantum (MUs)	Total Cost (Rs. Crore)
	SECI Wind Tranche-VI LTOA	175.34	50.67	121.40	35.09
	STOA (Non-Solar)	250.00	126.25	294.74	153.50
	SECI 150 MW	200.00	-	97.74	46.84
	Hindustan Waste Treatment plant Goa	10.00	5.00	3.75	1.85
	Vasudha Waste Treatment Plant Goa	-	-	2.28	1.14
H)	REC	-	-	-	20.02
I)	Other Charges	-	305.48		247.95
	PGCIL, POSOCO, and other Transmission Charges	-	305.48	-	230.76
	Open Access Charges	-		-	12.89
	IEX corridor charges	-		-	4.29
J)	TOTAL	5450.07	2081.55	5,583.44	2,557.91

Since projections for power transactions through Traders, Banking, REC, and UI are not undertaken due to their uncontrollable nature, the Hon'ble Commission did not approve the same in its Order dated 13th June 2024. Consequently, a variation of approximately Rs. 476.36 Crore has arisen between the approved and actual power purchase cost.

ED-Goa request the Hon'ble Commission to approve the above provided actual Power Purchase cost including the Transmission charges for FY 2024-25.

2.8 RPO (Renewable Purchase Obligation) and REC (Renewable Energy Certificate) for FY 2024-25

In accordance with the Joint Electricity Regulatory Commission for state of Goa & Union Territories (Procurement of Renewable Energy) (Fifth amendment), Regulations 2024, ED-Goa is obliged to fulfil its RPO compliances for FY 2024-25.

ED-Goa has already submitted its quarterly RPO compliance for FY 2024-25 before the Hon'ble Commission and the same is again submitted along with this petition (attached in **Annexure-3**).

Further, ED-Goa has made an extensive effort in fulfilling the RPO targets for FY 2024-25 mainly by purchase of physical power through bilateral contracts and traders. However, due to minor deficit in the RPO compliance, ED-Goa purchased RECs. For FY 2024-25, ED-Goa has purchased 630 MUs of RECs through power exchanges. The details of the RECs for FY 2024-25 are provided along with this petition (attached in **Annexure-4**).



Further, the units purchased through the state waste treatment plants (2 nos.) are considered at state periphery (power purchase bills). The remaining renewable sources through Long-Term, Medium-Term, and Short-Term Open Access (LTOA, MTOA, & STOA) are considered at regional periphery (Regional Energy Accounts (REA) of Western Region). The Distributed renewable Energy is considered as per the Solar Generation in the state of Goa through Roof-Top and Ground mounted Solar Systems (in kWh). The units consumed by the Green Energy Tariff consumers are negated from the overall compliance.

On the above-mentioned accounts, the summary of RPO compliance done by ED-Goa for FY 2024-25 is given in the table below:

Table 2-8: RPO Compliance for FY 2024-25

RPO	RPO Target to be Met for FY 2024-25		Cumulative Backlog as on 31-03-2024	Cumulative RPO Target for FY 2024-25	Total RPO Met during FY 2024-25	Cumulative Balance Surplus (-) / Deficit (+)	Cumulative RPO Met (April 2024 to March 2025)
	%	MU	MU	MU	MU	MU	%
Wind	0.67	33.30	0.00	33.30	69.20	-35.90	207.80%
HPO	0.38	18.89	1.20	20.09	21.00	-0.91	104.54%
Distributed Renewable Energy	1.50	74.55	0.00	74.55	81.54	-6.99	109.37%
Other RPO	27.35	1,359.37	14.88	1374.25	1473.83	-99.58	107.25%
Total	29.91	1,486.11	16.08	1502.19	1645.57	-143.37	109.54%

2.9 Capital Work in Progress, GFA and Depreciation

GFA: The Opening Balance of GFA (excluding the GFA addition through Duty/Grants/Consumer Contributions) is Rs. 1,380.94 Crore for FY 2024-25, which is the closing balance for FY 2023-24 approved by the Hon'ble Commission in its True-up Order for FY 2023-24 dated 30th September 2025. Further, the assets created through consumer contributions during FY 2024-25 are not considered in the GFA addition and shown separately in the Fixed Asset Register. The following table shows the opening balance, additions, deductions and closing balance of GFA for FY 2024-25:

Table 2-9: GFA for FY 2024-25

Particulars	Approved in T.O dated 13 th June 2024	Actual FY 2024-25
Opening Gross Fixed Assets (excluding GFA addition through Duty/Grants/Consumer Contributions)	1,511.12	1,380.94
Additions during the year	168.30	348.39
Less: Capitalization through Electricity Duty	-	78.11



Particulars	Approved in T.O dated 13 th June 2024	Actual FY 2024-25
Less: Capitalization through Street light Duty	-	24.99
Less: Adjustment/Retirement During the FY	-	9.61
Gross Fixed Assets at the end of year	1679.42	1,616.61

In the current Petition, for True Up for FY 2024-25, ED-Goa is submitting the above mentioned GFA figures based on the Audited Accounts and Fixed Asset Register for FY 2024-25 as directed by the Hon'ble Commission. The same are submitted along with this petition before the Hon'ble JERC (attached in Annexure-5).

Capital Expenditure and Capitalisation: ED-Goa submits that to relieve the overloaded infrastructure, to cater to the load, and to improvise the quality of Supply and increasing demand from HT/EHT and LT consumers, ED-Goa had undertaken the Capital Expenditure of **Rs. 1,415.17 Crore** and Capitalisation of **Rs. 348.39 Crore** for FY 2024-25. Further, ED-Goa has submitted the petition for approval of New Schemes and Additional Capital Expenditure for FY 2024-25 before the Hon'ble Commission on 13th October 2025, containing the detailed work-wise Capital Expenditure and Capitalisation as per the Annual Audited Accounts of FY 2024-25.

ED-Goa requests the Hon'ble Commission to allow the actual Capital Expenditure and Capitalisation in order to ensure the creation of infrastructure for adherence to Standards of Performance and Supply Code Regulations.

Depreciation: As per Regulation 31 of MYT Regulations, 2021, the depreciation for the assets shall be calculated annually at the rates specified in the prevailing regulations from time to time. The same have been applied on different asset categories. ED-Goa further submits that the depreciation arrived in annual accounts for FY 2024-25 is based on the rates specified by Hon'ble Commission in its MYT Regulations, 2021. The rates of depreciation for various assets are as tabulated below:

Table 2-10: Rate of Depreciation applicable for various assets for FY 2024-25

S/No	Particulars	Useful Life (Years)	Rate of Depreciation (%)
1.	Land owned under full title.	Infinity	0
2.	Land held under lease.		
A.	For investment in land.	Period of lease or the period remaining unexpired on the assignment of the lease	0
B.	For cost of clearing site.	Period of lease remaining unexpired at the date of clearing the site	0
	Assets purchased new -		
A.	Buildings and civil engineering works of a permanent character, not mentioned above:		
	- Offices and showrooms	50	1.8
	- Temporary erection such as wooden structures	5	18
	- Roads other than kutcha roads	50	1.8
	- Others.	50	1.8



S/No	Particulars	Useful Life (Years)	Rate of Depreciation (%)
B.	Transformers, transformer (kiosk) substation equipment & other fixed apparatus (including plant foundations)		
	- Transformers (including foundations) having a rating of 100 kilo volt amperes (kVA) and over	25	3.6
	- Others.	25	3.6
C.	Switchgear, including cable connections.	25	3.6
D.	Lightning arrestors:		
	- Station type	25	3.6
	- Pole type	15	6
	- Synchronous condenser.	35	2.57
E.	Batteries.	5	18
F.	Underground cable including joint boxes and disconnected boxes.	35	2.57
G.	Cable duct system.	50	1.8
H.	Overhead lines including supports:		
	- Lines on fabricated steel operating at nominal voltages higher than 66 kV	35	2.57
	- Lines on steel supports operating at nominal voltages higher than 11 kV but not exceeding 66 kV	25	3.6
	- Lines on steel or reinforced concrete supports	25	3.6
	- Lines on treated wood supports.	25	3.6
I.	Meters:		
	- Electro Mechanical	15	6
	- Electronic/Smart Meters.	10	9
J.	Self-propelled vehicles.	5	18
K.	Air conditioning plants:		
	- Static	15	6
	- Portable.	5	18
L.	Others:		
	- Office furniture and fittings	15	6
	- Office equipment	15	6
	- Internal wirings including fittings and apparatus	15	6
	- Street Light fittings.	15	6
M.	Apparatus let on hire:		
	- Other than motors	5	18
	- Motors	15	6
N.	Communication equipment:		
	- Radio and higher frequency carrier systems	15	6
	- Telephone lines and telephones.	15	6
O.	I.T. Equipment and Software.	6.67	15
P.	Assets purchased in second hand and assets not otherwise provided for in the schedule.	Such reasonable period as the Commission determines in each case having regard to	



S/No	Particulars	Useful Life (Years)	Rate of Depreciation (%)
		the nature, age and conditions of assets at the time of its acquisition by the current owner.	

Depreciation of Rs. 64.57 Crore as reflecting in the audited annual accounts is claimed, which is excluding the amount of depreciation on assets created through Duty, Grants, and Consumer Contributions. The detailed working of depreciation is provided in Tariff Formats of this Petition.

The following table below shows the depreciation arrived by ED-Goa for FY 2024-25 based on the approved depreciation rates specified by the Hon'ble Commission for different asset class:

Table 2-11: Depreciation for FY 2024-25 (Rs. Crore)

Particulars	Approved in T.O dated 13 th June 2024	Actual FY 2024-25
Opening Gross Fixed Assets (excluding GFA addition through Duty/Grants/Consumer Contributions)	1511.12	1,380.94
Additions during the year	168.30	348.39
Less: Capitalization through Electricity Duty	-	78.11
Less: Capitalization through Street light Duty	-	24.99
Less: Adjustment/Retirement During the FY	-	9.61
Closing Gross Fixed Assets	1679.42	1,616.61
Average Gross Fixed Assets	1595.27	1,498.77
Weighted Average Rate of Depreciation	4.34%	4.31%
Depreciation	69.23	64.57

ED-Goa submits that from the above table it can be observed that average Rate of Depreciation over GFA was 4.34% as approved by the Hon'ble Commission. However as per the audited accounts, average depreciation rate is 4.31%.

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

2.10 Operation & Maintenance Expenses

Operation & Maintenance Expenses consists of three elements, viz., Employee Expenses, A&G Expenses and R&M Expenses:

- Employee Expenses comprise salaries, dearness allowance, bonus, terminal benefits in the form of pension & gratuity, leave encashment and staff welfare expenses.
- Administrative and General Expenses mainly comprise rents, telephone and other communication expenses, professional charges, conveyance and travelling allowances and other debits.




Stephen Fernandes
Chief Electrical Engineer



- Repairs and Maintenance Expenses are towards the day-to-day upkeep of the distribution network of the Company and form an integral part of the Company's efforts towards reliable and quality power supply as also in the reduction of losses in the system.

Employee Expenses: ED-Goa has considered the Employee expense for FY 2024-25 based on the actual employee expenses incurred during the entire year. The details of the actual Employee Expenses are outlined in the following table for the approval of the Hon'ble Commission:

Table 2-12: Employee Expenses for FY 2024-25 (Rs. Cr.)

S/No	Particulars	Approved in T.O dated 13 th June 2024	Actual FY 2024-25
A.	Employee Cost (Other than covered in 'C'&'D')	-	463.61
	- Salaries	-	463.61
	- Dearness Allowance (DA)	-	-
	- Other Allowances+ HRA	-	-
	- Interim Relief / Wage Revision	-	-
	- Overtime	-	-
	- Bonus	-	-
	- Generation Incentive	-	-
	- Any Other Item (specify)	-	-
		-	-
B.	Other Costs	-	-
	- Medical Expenses Reimbursement	-	-
	- Travelling Allowance (Conveyance Allowance)	-	-
	- Leave Travel Assistance	-	-
	- Payment Under Workman's Compensation Act	-	-
	- Electricity Concession to Employees	-	-
	- Other Staff Welfare Expenses	-	-
	- Any Other Item (specify)	-	-
C.	Apprentice and Other Training Expenses	-	-
	Total (A+B+C)	-	463.61
D.	Contribution to Terminal Benefits	-	1.71
	- Earned Leave Encashment	-	-
	- Provident Fund Contribution (NPS)	-	-
	- Provision for PF Fund	-	-
	- Pension	-	1.71
	- Gratuity	-	-
	- Ex-gratia	-	-
	- Any Other Item (specify)	-	-
E.	Grand Total (A+B+C+D)	-	465.32





S/No	Particulars	Approved in T.O dated 13 th June 2024	Actual FY 2024-25
	Add: Salary Payable at the end of the year	-	39.30
	Less: Salary Payable at the beginning of the year	-	(32.22)
	Net Employee Expenses (E)-(F)	414.84	472.40

ED-Goa submits that Employee Expenses as approved by the Hon'ble Commission for FY 2024-25 was Rs. 414.84 Crore, whereas the actual expenditure for FY 2024-25 is Rs. 427.40 Crore, resulting in decrease of ~ 3.03 % over approved cost.

Repairs & Maintenance (R&M) Expenses: The Repairs & Maintenance Expenses have been claimed as per expenses actually incurred during FY 2024-25, which is reflected in the annual accounts of FY 2024-25.

The details of the actual Repair & Maintenance Expenses are outlined in the following table for the approval of the Hon'ble Commission:

Table 2-13: R&M Expenses for FY 2024-25 (Rs. Cr.)

S/No	Particulars	Approved in T.O dated 13 th June 2024	Actual FY 2024-25
A.	Plant and Machinery	-	46.06
	- 220 kV Sub-Station	-	-
	- 110 kV Sub-Station	-	-
	- 33kV Sub-Station	-	-
	- 11kV Sub-Station	-	-
	- Switchgear and cable connections	-	-
	- Others	-	-
B.	Building	-	3.33
	- Repairs and maintenance of transformers	-	-
	- Maintenance & repairs of electrical residential and non-residential buildings	-	3.33
C.	Civil Works	-	-
D.	Hydraulic Works	-	-
E.	Lines, Cables, Networks etc.	-	-
	- 220 kV Sub-Station	-	-
	- 110 kV Sub-Station	-	-
	- 33kV Lines	-	-
	- 11kV Lines	-	-
	- LT Lines	-	-
	- Others	-	-



S/No	Particulars	Approved in T.O dated 13 th June 2024	Actual FY 2024-25
F.	Vehicles	-	22.86
G.	Furniture and Fixtures	-	-
H.	Office Equipment	-	-
I.	Station Supplies	-	-
J.	Metering Equipment	-	0.20
K.	Any Other Item	-	0.14
	- Running and Maintenance of workshop	-	-
	- Compensation for electrocuted Animals	-	0.02
	- Compensation for electrocuted Human Beings	-	0.12
	Gross R&M Expenses (Sum of A to K)	-	72.59
	Add: Outstanding at the end of the current year	-	30.04
	Less: Advances to Contractors at the end of the year	-	0.01
	Add: Advances to Contractors at the beginning of the year	-	0.01
	Less: Outstanding at the beginning of the current year	-	27.65
	Add: Material lying at site at the beginning of current year	-	105.73
	Less: Material lying at site at the end of current year	-	120.26
	Net R&M Expenses	38.97	60.44

It is submitted that ED-Goa has been undertaking various Repairs & Maintenance activities as a step towards improvement of systems, reduction in breakdowns, and reduction in response time and increasing preventive maintenance.

ED-Goa further submits that R&M expenses are necessary for maintenance of infrastructure and for ensuring proper Standards of Performance of the Electricity Department Goa and therefore requests the Hon'ble Commission to approve Rs. 24.54 Crore for FY 2024-25 as R&M expenses.

Administrative & General (A&G) Expenses: The administrative expense mainly comprise rents, professional charges, office expenses, etc. The details of the actual Administrative & General Expenses are outlined in the following table for the approval of the Hon'ble Commission:




Stephen Fernandes
Chief Electrical Engineer

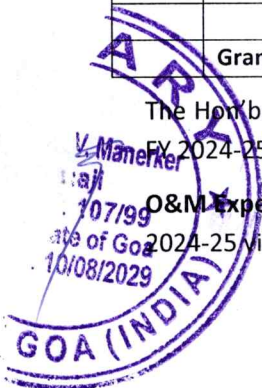


Table 2-14: A&G Expenses for FY 2024-25 (Rs. Cr.)

S/No	Particulars	Approved in T.O dated 13 th June 2024	Actual FY 2024-25
A			
1.	Lease/ Rent	-	1.18
2.	Insurance	-	-
3.	Revenue Stamp Expenses Account	-	-
4.	Telephone, Postage, Telegram & Telex Charges	-	-
5.	Incentive & Award to Employees/Outsiders	-	-
6.	Consultancy Charges	-	-
7.	Technical Fees	-	-
8.	Other Professional Charges	-	1.69
9.	Conveyance and Travelling Expenses	-	0.25
10.	License and Registration Fees	-	-
11.	Vehicle Expenses (Other Than Trucks and Delivery Vans)		
	- Vehicles Running Expenses Petrol and Oil	-	-
	- Hiring of Vehicles	-	-
12.	Security / Service Charges Paid to Outside Agencies	-	-
	Sub-Total 'A' (1 to 12)	-	3.12
B	Other Charges		
1.	Fee and Subscription for Books and Periodicals	-	-
2.	Printing and Stationery Expenses	-	-
3.	Advertisement Expenses (Other than Purchase Related) Exhibition & Demo.	-	0.49
4.	Contributions/Donations to Outside Institutes / Associations	-	-
5.	Electricity Charges of Offices	-	-
6.	Water Charges	-	-
7.	Entertainment Charges	-	-
8.	Miscellaneous Expenses	-	-
9.	Office Expenses	-	9.68
10.	Other Charges	-	94.76
11.	Minor works	-	0.65
	Sub-Total 'B' (1 to 11)	-	105.58
	Grand Total	36.14	108.70

The Hon'ble Commission is requested to approve the actual A&G expenses of Rs. 108.70 Crore for FY 2024-25.

O&M Expenses Summary: Based on the foregoing paragraphs, the actual O&M expenses for the FY 2024-25 vis-a-vis the approved figures by the Hon'ble Commission are shown in the table below:



**Table 2-15: Actual O&M Expenses for FY 2024-25 (Rs. Crore)**

Particulars	Approved in T.O dated 13 th June 2024	Actual FY 2024-25
Employee Expenses	414.84	472.40
R&M Expenses	38.97	60.44
A&G Expenses	36.14	108.70
O&M Expenses	489.94	641.54

The Hon'ble Commission is requested to approve the actual O&M Expenses for FY 2024-25 as shown in the table above. The details of O&M expense for FY 2024-25 are provided in the Tariff Formats.

Normative O&M Expenses:

The Hon'ble Commission approves normative O&M expenses in line with its MYT Regulations in its true-up exercise. Keeping with the methodology followed by the Hon'ble Commission and the MYT Regulations, 2021, ED-Goa has computed the normative O&M Expenses for FY 2024-25. The details of the methodology are provided below:

Normative Employee Expenses: The normative Employee Expenses approved by the Hon'ble Commission for FY 2023-24 in its order dated 30th September 2025 is further factored by the Growth factor of -3.01%. The result is inflated using the CPI inflation rate of 3.38% (actual for FY 2024-25).

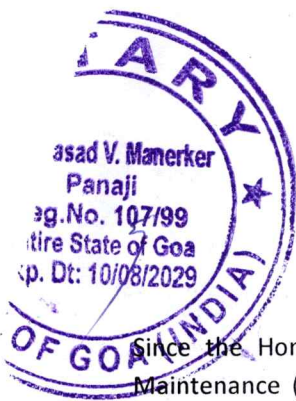
Normative R&M Expenses: The closing GFA for FY 2023-24 approved by the Hon'ble Commission in its order dated 30th September 2025 is factored by a K factor of 2.39% which was approved by the Hon'ble Commission in its 3rd MYT order dated 31st March 2022. The result is then inflated using WPI inflation rate of 2.27% (actual for FY 2024-25).

Normative A&G Expenses: The normative A&G Expenses approved by the Hon'ble Commission for FY 2023-24 in its order dated 30th September 2025 is inflated using CPI inflation rate of 3.38% (actual for FY 2024-25).

Normative O&M Expenses Summary: The normative O&M expenses for the FY 2024-25 computed for FY 2024-25 is shown in the table below:

Table 2-16: Normative O&M Expenses for FY 2024-25 (Rs. Crore)

Particulars	Actual FY 2024-25	Normative FY 2024-25
Employee Expenses	472.40	402.00
R&M Expenses	60.44	50.94
A&G Expenses	108.70	35.37
O&M Expenses	641.54	488.32



Since the Hon'ble Commission, during the true-up exercise, generally approves Operation & Maintenance (O&M) expenses at the lower of the actual or normative levels, and the same is considered in the ARR, ED-Goa proposes to adopt a similar approach and consider normative O&M expenses (being lower) in its ARR calculations. ED-Goa request the Hon'ble Commission to approve the above for FY 2024-25.



2.11 Interest & Finance Charges

The Regulation 29 of MYT Regulations, 2021 provides for Interest and Finance Charges on Loan. ED-Goa submits that the majority of capital assets are created out of the equity contribution from Government of Goa.

ED-Goa has claimed the interest expenses based on normative loan calculation whereby Closing Balance of loan for FY 2023-24 has been considered as opening Gross loan Opening for FY 2024-25 and 70% of Capitalisation (after deducting the assets created through Duty/Grants/Deposit works and deducting the Decapitalised Assets) during FY 2024-25 has been considered as normative debt addition during the financial year. Computation of the addition of normative loan during FY 2024-25 is shown below:

Table 2-17: Working of Normative loan addition during FY 2024-25 (Rs. Crore)

Particulars	Actual FY 2024-25
Additions to GFA	348.39
Less: Schemes out of ED Fund	78.11
Less: Schemes out of Streetlight Duty	24.99
Less: Decapitalized Assets	9.61
Net Additions to GFA	235.68
Normative Loan addition during the year (70% of Net Addition to GFA)	164.97

Opening balance of normative loan for FY 2024-25 is considered as per the closing balance of normative loan approved during truing up for FY 2023-24. The normative loan during the year is considered as the normative loan addition computed in the above table. Accordingly, the Interest expenses vis-à-vis approved by the Hon'ble Commission for FY 2024-25 shown below:

Table 2-18: Interest on normative loan for FY 2024-25 (Rs. Crore)

Particulars	Approved in T.O dated 13 th June 2024	Actual FY 2024-25
Opening Normative Loan	266.66	176.08
Add: Normative Loan during the year	117.81	164.97
Less: Normative Repayment	69.23	64.57
Closing Normative Loan	315.23	276.48
Average Normative Loan	290.94	226.28
Rate of Interest (@SBI MCLR rate plus 100 basis points)	9.50%	9.65%
Interest on Normative Loan	27.64	21.84

ED-Goa submits that the Regulation 29 of JERC MYT Regulations, 2021 specifies that,



"29.4 The rate of interest shall be the weighted average rate of interest calculated on the basis of the actual loan portfolio at the beginning of each Year applicable to the Transmission Licensee or the Distribution Licensee:

Provided that at the time of truing up, the weighted average rate of interest calculated on the basis of the actual loan portfolio during the Year applicable to the Transmission Licensee or the Distribution Licensee shall be considered as the rate of interest after prudence check:

Provided also that if there is no actual loan for a particular Year but normative loan is still outstanding, the last available weighted average rate of interest for the actual loan shall be considered:

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

In view of the above, ED-Goa submits that it has considered the SBI MCLR Rate as on 01st April 2024, i.e., 8.65% plus 100 basis points resulting in 9.65% as the interest rate on normative loan.

ED-Goa further submits that the repayment of normative loan has been considered equal to the normative depreciation for FY 2024-25 which is in line with MYT Regulations, 2021.

Other than Interest on normative loan, ED-Goa has claimed other Interest & Finance charges in the table below based on certain financial charges incurred by the department, which are related to bank charges, LC charges, etc. and the same also is in line with the provisional accounts:

Table 2-19: Other Interest and Finance Charges for FY 2024-25 (Rs. Crore)

Particulars	Approved in T.O dated 13 th June 2024	Actual FY 2024-25
Interest on Normative Loan	27.64	21.84
Other Finance Charges	-	3.03
Total Interest & Finance Charges	27.64	24.86

The Hon'ble Commission is requested to approve the Interest & Finance Charges for FY 2024-25 as computed in the above table. The details of Interest & Finance charges are provided in the Tariff Formats.

2.12. Interest on Working Capital

Regulation 53 of MYT Regulations, 2021, specifies the methodology for calculation of normative Working Capital and Interest on Working Capital as applicable to Goa Electricity Department, as shown below:

"53. Norms of Working Capital for Distribution Wires Business




Stephen Fernandes
Chief Electrical Engineer



53.1 The Distribution Licensee shall be allowed interest on the estimated level of working capital for the Distribution Wires Business for the Financial Year, computed as follows:

- a) O&M Expenses for one (1) month; plus
- b) Maintenance spares at 40% of repair and maintenance expenses for one (1) month; plus
- c) Receivables equivalent to two (2) months of the expected revenue from charges for use of distribution wires at the prevailing tariff;

Less:

- d) Amount, if any, held as security deposits under clause (b) of sub-section (1) of Section 47 of the Act from distribution system users except the security deposits held in the form of Bank Guarantees:

Provided that at the time of truing up for any Year, the working capital requirement shall be re-calculated on the basis of the values of components of working capital approved by the Commission in the truing up."

Further, Regulation 32.3 & 32.4 of the MYT Regulations, 2021 specifies the following:

"32.3 The interest on working capital shall be payable on normative basis notwithstanding that the Licensee has not taken working capital loan from any outside agency or has exceeded the working capital loan based on the normative figures.

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

The ED-Goa hereby submits that it has adopted the same methodology adopted by the Hon'ble Commission in the Tariff Order dated 30th September 2025 and that stipulated in the aforesaid Regulations of MYT Regulations 2021. ED-Goa submits that in line with the aforesaid Regulations, the Interest Rate has been considered as SBI MCLR Rate applicable as on 01st April 2024 (8.65%) plus 200 basis points, i.e., 10.65%.

Table 2-20: Interest on Working Capital for FY 2024-25 (Rs. Crore)

Particulars	Approved in T.O dated 13 th June 2024	Actual FY 2024-25
Two Months Receivable	418.35	495.03
O&M Expense - 1 month	40.83	40.69
Maintenance Spare @ 40% of Normative R&M Expenses of one month	1.30	1.70
Less: Amount held as Security Deposit (Average of Opening & Closing)	212.38	236.01
Less: Power Purchase cost for one (1) month	173.46	213.16
Total	74.64	88.26
Interest Rate	10.50%	10.65%



Particulars	Approved in T.O dated 13 th June 2024	Actual FY 2024-25
Interest on Working Capital	7.84	9.40

The Hon'ble Commission is requested to approve the Interest on Working Capital for FY 2024-25 as presented in the table above.

2.13 Interest on Consumer Security Deposits

Interest on Security Deposits has been calculated in accordance with the MYT Regulations, 2021 based on the average of opening and closing consumer security deposits during the year. The opening security deposit has been derived based on the closing security deposit of FY 2023-24. The addition during the year has been considered as per the actuals as reflected in the Annual Audited Accounts for FY 2024-25.

In accordance with the JERC (Electricity Supply Code) Regulations, 2018 and its amendments thereof, the rate of interest to the consumer has been considered at the Bank Rate declared by the Reserve Bank of India prevailing on the 1st of April 2024, i.e., 6.75% and the same has been considered for computation of Interest on Security deposit.

Table 2-21: Interest on Consumer Security deposit for FY 2024-25 (Rs. Crore)

Particulars	Approved in T.O dated 13 th June 2024	Actual FY 2024-25
Opening Security Deposit	204.31	221.32
Add: Deposits during the Year	16.13	32.31
Less: Deposits refunded	0.00	2.92
Closing Security Deposit	220.44	250.70
Average Security Deposit	212.38	236.01
Bank Rate	6.75%	6.75%
Interest on Consumer Security Deposit	14.34	15.93
Interest on Consumer Security Deposit paid	-	7.18

2.14 Return on Equity

ED-Goa submits that Regulation 28.2 and 28.3 of MYT Regulations, 2021 provides for Return on Equity (RoE), which specifies as under:

"28.2 The return on equity for the Distribution Wires Business shall be allowed on the equity capital determined in accordance with Regulation 27 for the assets put to use at post-tax rate of return on equity specified in the prevalent CERC Tariff Regulations for transmission system.

28.3 The return on equity for the Retail Supply Business shall be allowed on the equity capital



determined in accordance with Regulation 27 for the assets put to use, at the rate of sixteen (16) per cent per annum."

In line with the Tariff Order dated 30th September 2025, 90% of the equity has been allocated to the Distribution Wires Business and 10% allocation is for the Retail Supply Business. Return on equity rate of 15.50% for the Distribution Wires Business and a rate of 16% for the Retail Supply Business has been considered.

ED-Goa has considered the closing equity base for FY 2023-24 as opening GFA for FY 2024-25, as approved by the Hon'ble Commission in its order dated 30th September 2025. The computation of Opening Equity for FY 2024-25 is provided in the table given below:

Table 2-22: Equity Addition during FY 2024-25 (Rs. Crore)

Particulars	Actual FY 2024-25
Additions to GFA	348.39
Less: Schemes out of ED Fund	78.11
Less: Schemes out of Streetlight Duty	24.99
Less: Decapitalized Assets	9.61
Net Additions to GFA	235.68
Normative Equity addition during the year (30% of Net Addition to GFA)	70.70

Considering the RoE@15.5% for Distribution Wires Business and RoE@16.0% for the Retail Supply Business, the total Return on Equity for FY 2024-25 is computed as given below:

Table 2-23: Computation of Return on Equity FY 2024-24 (Rs. Crore)

Particulars	Approved in T.O dated 13 th June 2024	Actual FY 2024-25
Opening balance of Normative Equity	446.77	407.72
Equity Addition during year (30% of Net Addition to GFA)	50.49	70.70
Closing balance of Normative Equity	497.26	478.42
Average Equity Amount	472.02	443.07
Average Equity – Wires Business (90%)	424.82	398.76
Average Equity – Retail Supply Business (10%)	47.20	44.31
Return on Equity -Wires Business (%)	15.50%	15.50%
Return on Equity Retail Supply Business (%)	16.00%	16.00%
Return on Equity -Wires Business (Rs Crore)	65.85	61.81
Return on Equity Retail Supply Business (Rs. Crore)	7.55	7.09
Total Return on Equity (Rs. Crore)	73.40	68.90

In view of above, the Hon'ble Commission is requested to approve the Return on Equity for FY 2024-



25 as calculated in the above table.

2.15 Provision for Doubtful debts

ED-Goa submits that the Regulation 63 of JERC MYT Regulations 2021 specifies that,

"63. Provision for bad and doubtful debts

63.1 The Commission may allow bad debts written off as a pass through in the Aggregate Revenue Requirement, based on the trend of bad debts written off in the previous years, subject to prudence check:

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

Provided also that the provision for bad and doubtful debts shall be limited to 1% of the annual Revenue Requirement of the Distribution Licensee:

Provided further that if subsequent to the write off of a particular bad debt, revenue is realised from such bad debt, the same shall be included as an uncontrollable item under the Non-Tariff Income of the year in which such revenue is realised."

The Hon'ble Commission in its order dated 30th September 2025 did not approve the provision for Bad and Doubtful Debts for FY 2023-24. In view of the same, ED-Goa has not submitted the provision for Bad and Doubtful Debts for FY 2024-25.

2.16 Non-Tariff Income

Regulation 65 of the MYT Regulations, 2021 specifies the following:

"65. Non-Tariff Income

65.1 The amount of Non-Tariff Income relating to the retail supply of electricity as approved by the Commission shall be deducted from the Aggregate Revenue Requirement in calculating the tariff for retail supply of electricity by the Distribution Licensee:

Provided that the Distribution Licensee shall submit full details of its forecast of Non-Tariff Income to the Commission along with its application for determination of tariff.

65.2 The Non-Tariff Income shall inter-alia include:

- a) Income from rent of land or buildings;*
- b) Income from sale of scrap in excess of 10% of the salvage value;*
- c) Income from statutory investments;*
- d) Interest on advances to suppliers/contractors;*





- e) Rental from staff quarters;
- f) Rental from contractors;
- g) Income from hire charges from contractors and others;
- h) Income from advertisements, etc.;
- i) Meter/metering equipment/service line rentals;
- j) Service charges;
- k) Consumer charges;
- l) Recovery for theft and pilferage of energy;
- m) Rebate availed on account of timely payment of bills;
- n) Miscellaneous receipts;
- o) Deferred Income from grant, subsidy, etc., as per Annual Accounts;
- p) Prior period income, etc.:

Provided that the interest/dividend earned from investments made out of Return on Equity corresponding to the Retail Supply Business of the Distribution Licensee shall not be included in Non-Tariff Income:

Provided further that any income earned by a Distribution Licensee by sale of power to other Distribution Licensees or to Consumers as per Section 56 of the Act using the existing power purchase agreements or bulk supply capacity allocated to the Distribution Licensee's Area of Supply shall be reduced from the Aggregate Revenue Requirement of the Distribution Licensee for the purpose of determination of tariff. Such reduction shall be carried out in accordance with Joint Electricity Regulatory Commission for the State of Goa and Union Territories (Connectivity and Open Access in Intra-State Transmission and Distribution) Regulations, 2017, as amended from time to time."

The Non-Tariff Income approved by the Hon'ble Commission in the ARR for FY 2024-25 was Rs. 44.52 Crore. The details of actual Non-Tariff Income for FY 2024-25 are provided in the Tariff Formats.

Actual rebates received for early/prompt payment of the bills from the generators are considered as incentive and the same is taken under 'Rebates from Generators' in the Non-Tariff Income for FY 2024-25.

The summary of total Non-Tariff Income for FY 2024-25 is tabulated below:

Table 2-24: Non-Tariff Income for FY 2024-25(Rs. Crore)

Particulars	Approved in T.O dated 13 th June 2024	Actual FY 2024-25
Meter/service rent	23.70	-
Un Sales / Sales to Exchange		-
Wheeling charges under open access		-
Sale Proceeds of dead stock, wastepaper etc.		-
Rebates from Generators		-



Stephen Fernandes
Chief Electrical Engineer



Particulars	Approved in T.O dated 13 th June 2024	Actual FY 2024-25
Miscellaneous Receipts		37.92
Deferred Income (Electricity Development fund)		-
Income from trading		-
Income from Open Access Charges (Application fee, Cross Subsidy Surcharge, Additional Surcharge, Transmission and/or Wheeling Charges, Scheduling Charges etc.		-
Rebate on Power Purchase	20.82	31.31
Total Income	44.52	69.23
Add: prior period income	-	-
Total Non-Tariff income	44.52	69.23

In view of above, the Hon'ble Commission is requested to approve the Non-Tariff Income for FY 2024-25 as shown in the above table.

2.17 Aggregate Revenue Requirement for FY 2024-25

In view of the various parameters of the ARR discussed in above paragraphs, the Aggregate Revenue Requirement for FY 2024-25 as approved by the Hon'ble Commission and as per the True-up Petition claimed by ED-Goa are outlined in the following table:

Table 2-25: Aggregate Revenue Requirement for FY 2024-25 (Rs. Crore)

S/No	Particulars	Approved in T.O dated 13 th June 2024	Actual FY 2024-25
1	Cost of Power Purchase	2081.55	2,557.91
2	O&M Expenses	489.94	488.32
3	Depreciation	69.23	64.57
4	Interest and Finance Charges	27.64	24.54
5	Interest on Working Capital	7.84	9.40
6	Return on Equity	73.40	68.90
7	Provision for Bad Debt	-	-
8	Interest on Consumer Security Deposit	14.34	7.18
9	Total Revenue Requirement	2763.93	3221.14
10	Less: Non-Tariff Income	44.52	69.23
11	Net Revenue Requirement	2719.41	3151.91

The Hon'ble Commission is requested to approve the Net ARR for FY 2024-25 as described in the above table.

2.18 Revenue from Retail Sale of Power

The Revenue from Tariff for FY 2024-25 approved by the Hon'ble Commission in ARR order dated



13th June 2024 was Rs. 2,442.60 Crore at existing tariff and Rs. 2,597.38 Crore at approved retail tariff.

The actual revenue earned from the approved tariffs for FY 2024-25 is Rs. 2,970.21 Crore. Category consumer-wise bifurcation of revenue is shown in the table below:

Table 2-26: Actual Revenue from Tariff for FY 2024-25 (Rs. Crore)

Particulars	Actual FY 2024-25 (Rs. Crore)			
	Revenue from Fixed / Demand Charges	Revenue from FPPCA	Revenue from Energy Charges	TOTAL
<u>A. LOW TENSION SUPPLY</u>				
LTD/Domestic	48.34	69.09	500.91	618.34
LT-LIG (Low Income Group)	0.002	0.03	0.23	0.26
LTC/Commercial	31.05	43.21	310.51	384.77
LT Mixed Hotel Industries	0.18	0.25	1.86	2.29
LTI/ Industrial	8.45	5.83	39.86	54.14
LTAG/Agriculture (Pump sets/Irrigation)	1.10	0.23	2.69	4.03
LTAG/Agriculture (Allied Activities)	0.07	0.03	0.30	0.41
LTPL Public Lighting	2.46	6.24	77.11	85.80
LT Hoardings/Signboards	0.05	0.01	0.07	0.12
<u>B. HIGH TENSION SUPPLY</u>				
HTD Domestic	0.06	0.03	0.10	0.19
HT- Commercial	33.94	17.59	126.41	177.95
HT-Commercial (Green Consumer)	0.46	0.67	6.52	7.64
HTI / Industrial -				-
Connected at 11/33kV	140.48	108.67	766.29	1,015.45
Connected at 11/33kV (Green Consumer)	0.08	0.02	0.24	0.35
Connected at 110 kV	16.76	20.51	144.05	181.33
HT-Industrial (F/M, Steel Melt, Power Intensive)	33.52	35.40	253.20	322.12
HTAG/Agriculture (Pump sets/Irrigation)	0.49	0.06	1.12	1.68
HTAG/Agriculture (Allied Activities)	0.28	0.35	3.45	4.08
HTMES / Defence Establishment	2.55	2.70	19.79	25.04
<u>C. TEMPORARY SUPPLY</u>				
LT Temporary Domestic	0.20	0.32	2.20	2.72
LT Temporary Commercial	2.20	3.28	24.05	29.53
HT Temporary	1.21	0.66	4.64	6.51
<u>D. SINGLE POINT SUPPLY</u>				
Residential Complexes	-			-
Commercial Complexes	0.64	0.47	3.51	4.62
Industrial Complexes	-			-
<u>E. OTHER CATEGORIES</u>				



Particulars	Actual FY 2024-25 (Rs. Crore)			
	Revenue from Fixed / Demand Charges	Revenue from FPPCA	Revenue from Energy Charges	TOTAL
High Tension Railway Traction/HT-R – Connected at 110/220 kV	7.15	3.52	25.09	35.76
EV Charging Stations				-
LT EV	-	0.03	0.24	0.27
HT EV	-	0.51	4.30	4.81
TOTAL	331.71	319.74	2,318.76	2,970.21

In view of above, the Hon'ble Commission is requested to approve Revenue from sale of power for FY 2024-25 as detailed in the above table.

2.19 Revenue Gap for FY 2024-25

ED-Goa in its submission of the Tariff Proposal for FY 2024-25 had submitted to increase the Tariff for FY 2024-25.

The Hon'ble Commission vide its Tariff Order dated 13th June 2024 had considered an average tariff hike of 3.50 % for FY 2024-25, with the remaining gap to be recovered from the Government of Goa's budgetary support.

Thus, the revenue gap of Rs. 196.74 Crore arrived at for FY 2024-25 under True Up exercise shall be met by the Government of Goa as per the budgetary support letter issued. The letter is provided along with this petition (attached in **Annexure-6**). Hence, the Revenue Gap carried forward to the subsequent financial years has been considered as NIL.

The computation of Revenue Gap is provided in the table below:

Table 2-27: Revenue Gap for FY 2024-25 (Rs. Crore)

Particulars	Approved in T.O dated 13 th June 2024	Actual FY 2024-25
Net Aggregate Revenue Requirement	2719.42	3151.91
Revenue from Retail Sales at Approved Tariff	2597.38	2,970.21
Revenue Gap	122.04	181.70
Less: Budgetary Support from Govt. of Goa	122.04	181.70
Final Net Revenue Gap to be carry forward	-	-

In view of the above, the Hon'ble Commission is requested to approve the Revenue Gap for FY 2024-25 as NIL as computed in the above table and not to carry forward the same to subsequent years.





3 COMPLIANCE OF DIRECTIVES GIVEN BY HON'BLE COMMISSION

ED-Goa submits that the Hon'ble Commission in its latest MYT Order for FY 2025-26 to FY 2029-30 dated 30th September 2025 had laid down certain directives to be complied by ED-Goa. The directives as provided by the Hon'ble Commission and the status of the said directives are replied as below:

3.1 Status of Compliance of Directives issued in tariff order dated 30th September 2025

S.N.	Directives in brief	Commission's Direction in the MYT Order for FY 2025-26 to FY 2029-30 dated 30 th September 2025	Compliance by the Electricity Department, Goa
1.	Sub-Divisions as Strategic Business Units	The Commission appreciates the submission of the Petitioner. The Commission directs the Petitioner to submit the details of the work being done and the progress report within two months of the issuance of this order.	ED-Goa submits that: <ul style="list-style-type: none">The department has already undertaken the SAP Migration from ECC 6.0 to S4/HANA.The work has been awarded to M/s Highbar Technocrat Limited.Under this system, different modules namely (a) Project Systems, (b) Materials Management, (c) Finance and Controlling, (d) Quality Management, (e) Plant Maintenance, (f) Sales & Distribution, etc., have been incorporated and thereafter will be interlinked with each other.The AS-IS study has been carried out for each of the module and subsequently the to-be designing in line with the system functionalities is in progress. Thereafter, the detailed internal customization for each of the activities under the respective modules will be finalized. Finally, the interlinking with each of the module will be completed.


Stephen Fernandes
Chief Electrical Engineer



S.N.	Directives in brief	Commission's Direction in the MYT Order for FY 2025-26 to FY 2029-30 dated 30 th September 2025	Compliance by the Electricity Department, Goa
			<ul style="list-style-type: none"> The Go-Live of S4/HANA has been scheduled since April 2026. Post Go-Live, the double entry system for accounting will be followed. After the implementation of this system, each division will maintain separate financial accounts and P&L statements, thereby fulfilling the Hon'ble Commission's directive to classify Sub-Divisions as Strategic Business Units.
2.	Installation of Pre-Paid Meters	The Commission notes reply of the Petitioner and the Petitioner is directed to submit the progress report within 2 months of the issuance of this order. Further, the Petitioner is directed to file petition for the Commission's approval along with DPR details of volume of works and associated cost, funding plan and its cost-benefit analysis within 3 months from the date of order.	<p>ED-Goa submits that:</p> <ul style="list-style-type: none"> The work order was issued to the L1 bidder M/s Digismart Network Pvt. Ltd. (Lead Consortium Member) and CWD Limited (Consortium Member) Jaipur, Rajasthan, on 29th May 2025 for an amount of Rs. 890,11,97,693/- and the contract agreement was signed on 29th May 2025. The implementation of Smart Prepaid work is in progress. Survey of Feeders, DTRs & Consumers is in progress. The actual installation of Smart Meter will begin in the month of December 2025. The petition shall be filed separately.
3.	Determination of Category wise/ Voltage wise Cost of supply	The Commission has noted the response of the Petitioner. The Commission directs the Petitioner to submit the details of the work being done and the progress report within 3 months of the order.	<p>EDG submits that:</p> <ul style="list-style-type: none"> The Report on the Voltage-wise Cost of Supply (VCoS) study has been completed and is currently under review by the Department's officials. Upon obtaining approval from the Government of Goa, the Report will be submitted to the Hon'ble Commission on priority.



4 PRAYER'S TO THE COMMISSION

4.1 Prayer to the Hon'ble Commission

The Electricity Department, Government of Goa (ED-GOA) respectfully prays to the Hon'ble Commission to:

- a) Accept and admit the petition for True-up of FY 2024-25 which is in line with the principles laid by the Hon'ble Commission contained in the MYT Tariff Regulations 2021;
- b) Accept and admit the Tariff Formats attached in **Annexure-1** of this petition for the True-up of FY 2024-25.
- c) Approve the actual Revenue gap for FY 2024-25 as per the True-up exercise.
- d) Pass suitable orders with respect to True-up of FY 2024-25 for the expenses to be incurred by ED-Goa for serving its consumers;
- e) Grant any other relief as the Hon'ble Commission may consider appropriate;
- f) The Petitioner craves leave of the Hon'ble Commission to allow further submission, addition and alteration to this petition as may be necessary from time to time;
- g) Condone any inadvertent omissions/errors/shortcomings and permit ED-Goa to add/ change/ modify/ alter this filing and make further submissions as may be required at a future date;
- h) To pass any other Order as the Hon'ble Commission may deem fit and appropriate under the circumstances of the case and in the interest of justice.

The Petitioner declares that the subject matter of the petition has not been raised by the petitioner before any other competent forum, and that no other competent forum is currently seized of the matter or has passed any order in relation thereto.





5 ANNEXURES

- 5.1 Annexure-1: Tariff Formats for True-up of FY 2024-25
- 5.2 Annexure-2: Power Purchase Details of FY 2024-25
- 5.3 Annexure-3: Renewable Purchase Obligation (RPO) Compliance of FY 2024-25
- 5.4 Annexure-4: Renewable Energy Certificates (RECs) in FY 2024-25
- 5.5 Annexure-5: Annual Audited Accounts of FY 2024-25
- 5.6 Annexure-6: Govt of Goa Budgetary Support Letter for FY 2024-25.

