REJOINDER TO OBJECTIONS

ON

ARR & TRANSMISSION TARIFF APPLICATION FOR FY 2026-27
&
TRUING UP APPLICATION FOR FY 2024-25
(CASE NO. 121/2025)

SUBMITTED TO
ODISHA ELECTRICITY REGULATORY COMMISSION

ODISHA POWER TRANSMISSION CORPORATION LIMITED
BHUBANESWAR - 751007

JANUARY 27, 2026

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AFFIDAVIT

I, **Basudeb Bhatta**, aged about **52** years, son of Late Subal Charan Bhatta, residing at 226, Kharavel Nagar, Unit-3, Bhubaneswar, Odisha, PIN-751001, do hereby solemnly affirm and state as follows:

1. That I am the Co-Convenor of Aama Janata Adhikar, an organization dedicated to advocating for the rights and interests of consumers and the general public in Odisha, particularly in matters related to public utilities, energy affordability, and sustainable development. I am duly authorized to file this affidavit on behalf of the organization, which represents a category of electricity consumers and the general public in Odisha. I am filing these objections and suggestions in response to the Public Notice issued by Odisha Power Transmission Corporation Ltd. (OPTCL) in Case No. 121/2025 before the Odisha Electricity Regulatory Commission (OERC), regarding the approval of Aggregate Revenue Requirement (ARR) and Determination of Transmission Tariff for FY 2026-27, along with Truing Up for FY 2024-25.

2. That I have perused the application filed by OPTCL on 29.11.2025, as well as the Public Notice published in accordance with Sections 62 & 64(2) of the Electricity Act, 2003, and relevant OERC regulations. The proposed transmission tariff of 35.61 paise/unit (Rs. 8545/MW-Day) and transmission loss of 3.05% represent an unjustified escalation that will unduly burden Odisha's electricity consumers through higher retail tariffs. Compared to the approved figures for FY 2025-26 (tariff at 25.50 paise/unit and loss at 3.00%), this implies a ~40% tariff hike, potentially increasing overall power costs passed through GRIDCO and DISCOMs by 10-15 p/u if approved. I strongly object to this proposal and submit the following objections with justifications, aimed at protecting consumer interests and ensuring public benefits: a. Strong Objection to Proposed Transmission Tariff Hike; Demand Rigorous Prudence Check on ARR Components: The proposed tariff of 35.61 paise/unit is an exorbitant ~40% increase over the approved 25.50 paise/unit for FY 2025-26, which could inflate retail tariffs and exacerbate financial strain on Odisha's consumers, including households, agriculture, and industries. Justification: In the FY 2025-26

Basudeb Bhatta

29.12.2025

order, OERC moderated OPTCL's proposed tariff from 36.08 paise/unit to 25.50 paise/unit after disallowing unjustified escalations in ARR (approved Rs. 1,331.02 Cr. vs. proposed Rs. 1,663.33 Cr.), including reductions in employee costs (from Rs. 554.05 Cr. to Rs. 493.12 Cr.), R&M (from Rs. 217.70 Cr. to Rs. 160 Cr.), depreciation (from Rs. 356.57 Cr. to Rs. 284.33 Cr.), and interest (from Rs. 145.61 Cr. to Rs. 120.37 Cr.) due to lack of prudence and over-projections. The current proposal lacks transparency on ARR drivers (e.g., capital additions, O&M escalations) and may include inefficiencies like delayed projects or inflated costs. I object and urge the Commission to conduct a detailed prudence audit under OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014, to disallow padded expenses and cap tariff at FY 2025-26 levels adjusted only for verifiable inflation. This could prevent undue consumer burden, as seen in past moderations. b. Objection to Transmission Loss Projection; Suggest Stricter Efficiency Targets: The proposed loss of 3.05% is higher than the approved 3.00% for FY 2025-26, potentially leading to higher effective costs for wheeling and open access, passed on to consumers. Justification: Historical data shows actual losses at 3.11% in FY 2023-24 (against approved 3.00%), indicating persistent inefficiencies in network maintenance or overloads. In FY 2025-26, OERC reduced the proposed loss from 3.05% to 3.00% based on trends and directed OPTCL to improve through audits and upgrades. I strongly object to the hike and suggest linking approvals to binding targets (e.g., reduce to 2.90% via smart grid investments), with penalties for non-achievement credited back via lower tariffs. This would enhance system reliability, reduce consumer costs by 0.5-1 p/u, and promote efficient transmission. c. Objection to Rebate and Late Payment Surcharge Structure; Propose Enhanced Consumer Protections: The proposed rebate (2% within 2 days, 1% within 30 days for DISCOMs) and surcharge (as per regulations) may not adequately incentivize efficiency, allowing OPTCL to recover inflated costs from delays. Justification: In FY 2025-26, rebate was approved at Rs. 20.17 Cr. (down from proposed Rs. 27.97 Cr.), with surcharge following regulations (1.25%/month beyond due dates). However, persistent arrears from users contribute to ARR hikes without accountability. I object and suggest increasing rebate to 2.5% for early payments, capping surcharge at 1%, and extending rebates to open access customers to encourage timely settlements. This would reduce interest burdens in ARR and benefit consumers through lower pass-through costs. d. Objection to Lack of Transparency in Capital Expenditure and Truing Up; Advocate for Audit and Offsets: The application includes truing up for FY 2024-25 without public details on variances, potentially hiding underperformance or unjustified claims that inflate future ARR. Justification: In FY 2025-26 order (truing up FY 2023-24), OERC approved a deficit of Rs. 37.03 Cr. (down from proposed Rs. 139.71 Cr.) after disallowing over-claims in depreciation, interest, and other costs, resulting in cumulative surplus. Similar scrutiny is needed here to verify actuals (e.g., capex utilization, O&M efficiencies) and offset with non-tariff income (e.g., from investments). I strongly object and suggest mandatory independent audits, disallowing non-prudent capex (e.g., delayed projects like 400kV lines), and crediting surpluses to reduce tariffs. This would ensure cost controls and prevent consumer subsidization of inefficiencies. e. Objection to Insufficient Sustainability Measures; Mandate Green Transmission Initiatives: The proposal overlooks integration of renewables and grid modernization, perpetuating high losses and costs amid Odisha's growing RE targets. Justification: OERC has directed OPTCL in past orders (e.g., FY 2025-26) to enhance evacuation for solar/wind (e.g., via GIS substations) and reduce losses through tech upgrades, but progress is slow. The proposed structure ignores environmental costs like right-of-way issues. I object and suggest mandating plans for RE-friendly infrastructure (e.g., hybrid lines), quarterly performance reports on losses and capex via OPTCL's website, and

29.12.2025

Bandeb Bagh

tying approvals to RE evacuation targets. This would lower long-term costs, create jobs, and mitigate climate impacts for the public.

3. That these strong objections are filed in the interest of Odisha's electricity consumers and the general public, aiming to prevent unjustified tariff hikes and ensure affordable, efficient, and sustainable transmission services. I request that the Commission admit these submissions, allow me/us to be heard in person during the public hearing, and consider them while determining the ARR, tariff, and truing up.

4. That a copy of this affidavit, along with the objections and suggestions, is being served simultaneously on the Chairman-cum-Managing Director, Odisha Power Transmission Corporation Ltd., Janpath, Bhubaneswar-751007, as required.

5. That the facts stated above are true to the best of my knowledge and belief, based on records and information available, and nothing material has been concealed therefrom.

Basudeb Bhatta
DEPONENT

VERIFICATION:

I, the above-named deponent, do hereby verify that the contents of the above affidavit are true and correct to the best of my knowledge and belief, no part of it is false, and nothing material has been concealed therein. Verified at Bhubaneswar on this 29th day of December, 2025.

Basudeb Bhatta
DEPONENT

29.12.2025

Copy to CMD, OPTCL for information

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
PLOT NO. 4, SAILESHREE VIHAR,
CHANDRASEKHARPUR, BHUBANESWAR-751021

CASE NO. 121/2025
FILING NO. 3

IN THE MATTER OF: (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

And

(ii) Truing up application for the FY 2024-25 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

AND
IN THE MATTER OF: Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

..... Applicant

vrs

M/s. Basudeb Bhatta, Co-Convenor of Aama Janata Adhikar, 226, Kharavel Nagar, Unit-3, Bhubaneswar-751001 Odisha and **16 others.** **..... Objectors**

Rejoinder to the objections raised by the Objector M/s. Basudeb Bhatta, Co-Convenor of Aama Janata Adhikar.

The humble applicant above named

MOST RESPECTFULLY SHEWETH:

1. The Objector Sri Basudeb Bhatta vide affidavit dated 29.12.2025 has raised certain submissions on ARR & Transmission Tariff Application of OPTCL for FY 2026-27 and

Truing up application for FY 2024-25. In reply, OPTCL submits its rejoinder to the submissions in the following paragraphs.

Justification for proposal tariff of 35.61 P/U

Being the STU as well as a Transmission licensee, OPTCL is primarily responsible for transmitting electricity from power generation companies to the distribution companies within the State. The transmission infrastructures have been created based on the requirement / recommendation of Distribution Companies considering following components mainly:-

- To provide the power supply toupcoming Industrial hub.
- To strengthen the Inter State Power connectivity for import / export of power.
- To improve the voltage profile in the low voltage area/pockets.
- To provide un-interrupted power to the EHT, HT and LT Consumers of the state
- Availability of alternate power supply and also meet the N-1 Transmission planning criteria
- To improve the system availability, reliability & quality of the power supply.
- To meet the future load growth.
- To improve socio economic status of peripheral inhabitants.
- To reduce Transmission Losses.

Further, the Transmission infrastructures are created considering the demand and request of the DISCOMs from time to time, with approval of the Hon'ble OERC through Transmission Plan. Being a Deemed Transmission License, OPTCL has always endeavored to create the Transmission infrastructure for providing reliable and quality power to the consumers of DISCOMs. Accordingly, every year OPTCL is adding more transmission assets to meet the requirement of DISCOMs. Transmission Charge is arrived at 35.61 paise per unit by dividing the total ARR of OPTCL with the recent realistic MU projections of DISCOMs and recovered from them on a monthly basis. This rate will decrease if DISCOMs drawal increases. In fact, OPTCL has consistently advocated for the recovery of transmission charges based on contracted capacity, in line with the practice followed by STUs in other states. The proposed Transmission Charge of 35.61 p/u has been derived by considering the recent realistic energy demand projections of 41,849.28 MU as communicated by the DISCOMs & other LTOA customers and the ARR figures have been arrived by OPTCL justifying component wise projections as per the provisions contained in OERC Transmission Tariff Regulations, 2014, OPTCL's Audited Accounts for FY 2024-25, all relevant data/information and

materials. The details of projections are submitted in page 30 of the present ARR application of OPTCL for FY 2026-27.

Hence, mere apprehension of the respondent towards imposition of excessive burden on Discoms seems to be inappropriate and unacceptable which is likely to be rejected at this juncture. Moreover, the contention of the stake holder operating in the value chain of electricity needs to appreciate the fact that the cost recovery has to be in full so as to make the sector sustainable.

Hence, OPTCL does not agree with the views of the Objector.

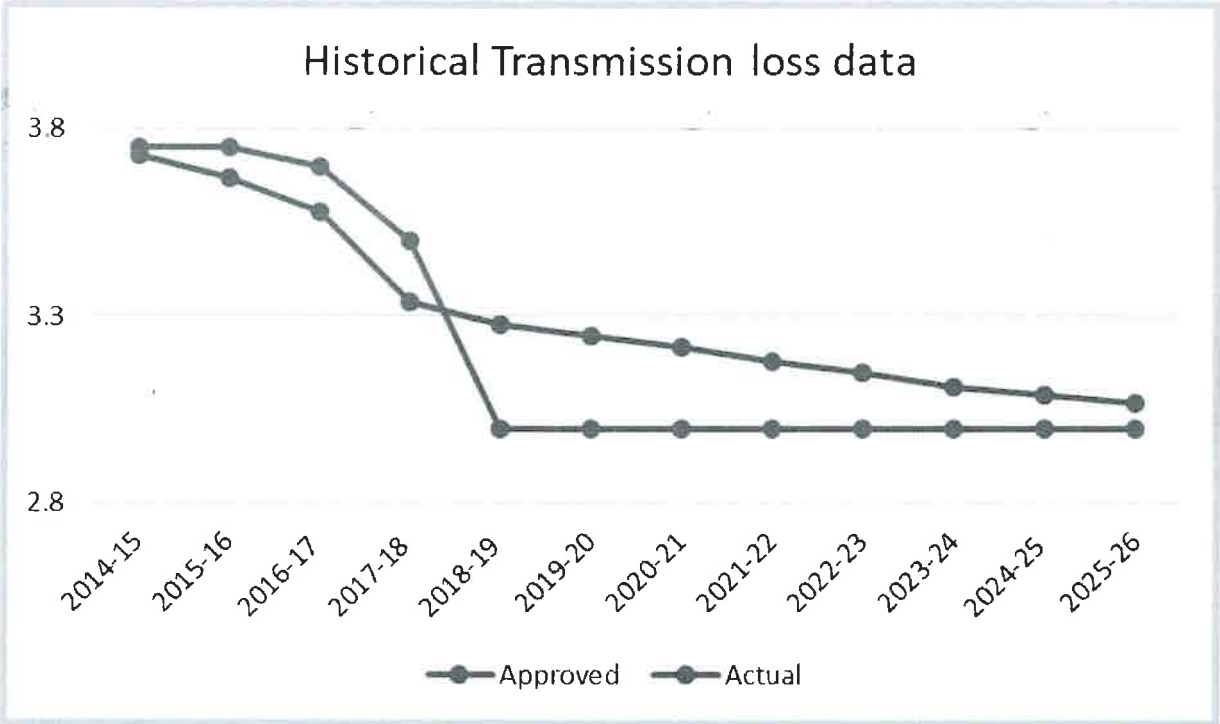
Justification of Proposal of Transmission loss of 3.05% for FY 2026-27:

In the OPTCL system, the transmission loss is purely technical loss and a function of real time injection of power by a number of generators, system configuration and power flow requirements at different load centers. It depends on many parameters / factors such as distance and mismatch between generation and load centers, types of load, reactive power compensation, voltage profile, seasonal variation of demand load etc. Thus, OPTCL does not have much control over the same at any point of time. The transmission system of OPTCL operates as an integral part of the Eastern Region Grid to serve the internal demand of the State as well as to carry out import and export of power depending upon the system demand.

As a matter of fact, some grid s/s and lines are being constructed in many remote and deprived areas funded under Central & State Govt. schemes in the interest of the public. Additional length in EHT lines and Sub-stations in under-loaded areas are also responsible for increase in transmission loss.

The Transmission Loss in OPTCL network is in a gradually reducing trend over the years i.e. from 3.73% during 2014-15 to 3.18% in 2021-22 and has remained 3.07% within 1st six months of FY 2025-26 mainly due to addition of infrastructure and various system strengthening works taken up by OPTCL. The actual losses incurred over the years by OPTCL have been within the margin allowed by Hon'ble Commission up to the year FY 2017-18. However, in the FY 2018-19, the commission set the loss at 3.00% though the projected transmission loss was at 3.25% and thereafter the commission has been pegging the transmission loss at the same level though loss projected by OPTCL remained in a downward trend.

Year	Tr. Loss proposed	OERC Approval	Actual
2014-15	3.75%	3.75%	3.73%
2015-16	3.75%	3.75%	3.67%
2016-17	3.70%	3.70%	3.58%
2017-18	3.50%	3.50%	3.34%
2018-19	3.25%	3.00%	3.28%
2019-20	3.25%	3.00%	3.25%
2020-21	3.20 %	3.00%	3.22%
2021-22	3.15%	3.00%	3.18%
2022-23	3.10%	3.00%	3.15%
2023-24	3.10%	3.00%	3.11%
2024-25	3.05%	3.00%	3.09%
2025-26	3.05%	3.00%	3.07% (1st Six months)



From the table given above, it is also clear that each year upto FY 2017-18, the transmission loss achieved by OPTCL has remained at a level lower than the approved figures by Hon'ble commission and from FY 2018-19 the target set by OERC appears to be very stiff which was hard to achieve though **the trend of lesser transmission loss year after year has been achieved.**

It may kindly be appreciated that the transmission loss (technical) is bound to happen as per law of physics and is very difficult to reduce after a certain level. Also, at all India level, the transmission loss of different regions for FY 2023-24 is depicted below:

Region	Transmission loss
Northern Region	3.15%
Western Region	3.12%
Southern Region	3.46
Eastern Region	4.24

Courtesy: General Review 2025 by CEA, Ministry of Power report

The loss level of **3.07%** (OPTCL) is comparatively low as compared to Eastern region average loss.

However, as a responsible Transmission utility, OPTCL is making an all-out effort to reduce the transmission loss further by undertaking various **system operation and loss reduction measures** by implementing the emerging technologies like **system Automation**, load bifurcation, **modification in system configuration**, procurement of more efficient equipment, **Digitalization of grids** by using Bay Control units, Protection system improvement using Busbar protection and Event Logger, **Conversion of Radial to Ring system,** Advanced Metering Infrastructure (SAMAST) etc. to bring it to **3.05% by FY 2026-27** as proposed under ARR application of OPTCL for FY 2026-27**.**

Regarding increase of rebate from 2% to 2.5% for recovery of past dues:

OPTCL recovers transmission charges primarily from four DISCOMs and other LTA customers. As per OERC regulations, DISCOMs are eligible to avail rebates for timely payment, whereas other LTA customers are subject to penalties for delayed payment and are not entitled to any rebate. Based on past observations, it has been noted that DISCOMs typically pay the transmission charges within two days in order to avail the rebate. Accordingly, OPTCL does not face issues of payment default. OPTCL recovers the full transmission charges from all users. Any enhancement in the %(percentage) of rebate is a burden to consumers. Therefore, the respondents' suggestion to increase the rebate for recovery of past dues may not be applicable in the case of OPTCL.

Transparency in Capital Expenditure

OPTCL is a State Government undertaking staffed with highly qualified professionals from diverse disciplines such as engineering, finance, human resources, and legal services. OPTCL consistently adheres to and complies with all rules, notifications, guidelines, and directions issued by the State Government in all matters, including

capital expenditure. The organization maintains complete transparency in the tendering process as well as in the execution of works.

With regard to audit, internal audits are conducted by independent firms of Chartered and Cost Accountants. Statutory audits are carried out by reputed Chartered Accountant firms appointed by the Comptroller and Auditor General (CAG), Government of India, and supplementary audits are conducted by the Audit team of the PAG, Odisha. Transaction Audit & Performance Audit by CAG(O).In addition, audits of specific projects and schemes are also undertaken by audit teams of the PAG (Odisha) and the Government of Odisha.

RE evacuation and adoption of newer technologies:

OPTCL is constructing a 400/220 kV GSS at Therubali for the evacuation of power from pumped storage projects, a 132/33 kV GSS at Manmunda for the evacuation of solar power, and a 220/33 kV Solar Pooling Station at Padepadar, Mukhiguda, for the evacuation of floating solar power from the Upper Indravati Reservoir. There are several such initiatives undertaken by OPTCL that primarily focus on the development and integration of renewable energy projects.

Further, OPTCL is implementing the STAMS project for centralized operation of all GSSs, has standardized the design of multi-circuit towers, and has successfully implemented digital substation technology at the 132/33 kV Agalpur–Rampur GSS, among other initiatives.

2. The objections not specifically admitted may be deemed to have been denied.

PRAYER

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of Sri Basudeb Bhatta while approving ARR and Transmission Tariff of OPTCL for FY 2026-27 & Truing up application for the FY 2024-25.

By the Applicant
Through

Sr. GM (El.), RT&C

Bhubaneswar
January 27, 2026

NOTARY GOVT. OF O...

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSIONER, PLOT NO. 4, CHUNUKOLI, SAILESHREE VIHAR, CHANDRASEKHARPUR, BHUBANESWAR-751021.

Case No. 121/2025

In the matter of

An application for approval of Annual Revenue requirement and determination of Transmission Tariff as per Sc-62-64 of Electricity Act, 2003 of OPTCL for the Year 2026-27.

AND

O/o THE CHIEF GENERAL MANAGER (COMMERCIAL & TARIFF) OPTCL, BHUBANESWAR
19 JAN 2026
114
CENTRAL DIARY
No. 68
Dt. 17.01.26
OPTCL, HQ., BBSR

In the matter of

Orissa Power Transmission Corporation Ltd (OPTCL), Bhubaneswar.

In the matter of

Ramesh Ch. Satpathy, aged about 80 years, Plot No. 302(B), Beherasahi, Nayapally, Bhubaneswar-751012, Dist- Khurda, being the president of Upobhokta Mahasangha, Bhubaneswar & the Secretary of National Institute of Indian Labour.

The petitioner most Respectfully Showeth :

1. That OPTCL is a transmission license in the state of Orissa & the said company is a fully Govt. owned company for transmission of power from the generating units of the state and supply the said power to the 1 Crore consumer of Odisha through DISCOMS.
2. That, the objector being a consumer and representing the group of consumer of the state have drawn the attention to the Hon'able Commissioner to kindly direct the OPTCL to give an undertaking through an affidavit, that the supply position of the state is always stable. As because all the DISCOMs of the state have mentioned, the 33/11 KV S/s now under their control are not up to the standard, for which regular power interruption are there.
3. That, the OPTCL has to produce why the funds allotted for O&M work has not been utilized properly. Near about 58% regular posts are laying vacant in OPTCL, for which proper maintenance are not carried out by the applicant.
4. That, the OPTCL management are not paying equal salary to the outsource/ contractual workers with regular workers with equal nature of work. They should pay equal salary as they are doing equal nature of work.
5. That, the OPTCL management have not yet prepared a regulation for regularize the contractual/ outsource workers working under OPTCL, that should be done and produce before the Hon'able Commission.
6. That, the OPTCL management have not prepared the yardstick as per the increase systems.
7. That, the management has to produce the list of outsource workers category wise & division wise with the name of contractor before allowing the O&M expenses.
8. That, the OPTCL management has to produce the detail expenditure incurred in O&M work:
   i) O&M, ii) Telecom, iii) Civil, iv) Technical since 2010 to 2024.
9. That, the OPTCL management have mentioned near about 165 nos. of sub-station & 14804 kms. Of lines are now available for operation. The OPTCL should produce the detail list of sub-stations & lines those who are outlive & not in a position to work. What action OPTCL has taken for renovation & modernization of the above line & sub-stations?
10. That, the OPTCL has to produce the division wise list of work under taken from 2020 to 2025 through different Govt. funded scheme along with details amounts.

NOTARY GOVT. OF ODISHA REGD. NO. 09-2004

PRAYER

Under the above circumstances I pray before the Hon'ble Commission to kindly direct OPTCL to give an undertaking through an affidavit that quality power supply with required voltage should be given to the consumers of the state. The lines and substations of OPTCL should be well managed with permanent regular manpower or otherwise the revenue requirement should not be considered for the OPTCL. The Transmission Tariff proposed by OPTCL is not acceptable as because the applicant have not taken any action on the direction of the Hon'able OERC.

DEPONENT

VERIFICATION

I the deponent above name to here by verify that the contents of my above affidavit are true to the best of my knowledge and not part of it is false and nothing material has been concealed there form.

Date. 16/01/2026

Bhubaneswar.

VERIFICANT

NOTARY
PRANAB KU. MOHANTY
REGD. NO.
OM-28/04
GOVT. OF ODISHA

16.1.26

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
PLOT NO. 4, SAILESHREE VIHAR,
CHANDRASEKHARPUR, BHUBANESWAR-751021

CASE NO. 121/2025
FILING NO. 3

IN THE MATTER OF: (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

And

(ii) Truing up application for FY 2024-25 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

AND
IN THE MATTER OF: Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

..... Applicant

Vrs.

Sri Ramesh Ch. Satpathy
Secretary of National Institute of Indian Labour & President of Upobhokta Mahasangha, Bhubaneswar
Plot No. 302(B), Beherasahi, Nayapalli,
Bhubaneswar-751012, Dist: Khurda and **16 others.**

------ Objectors

Rejoinder to the objections raised by Objector Sri Ramesh Ch. Satapathy

The humble applicant above named

MOST RESPECTFULLY SHEWETH:

1. That the Objector Sri Ramesh Ch. Satapathy vide affidavit dated 16.01.2026 has raised certain objections on ARR & Transmission Tariff Application of OPTCL for FY 2026-27 and Truing up application for FY 2024-25.

In reply to objections raised by the Objector, OPTCL humbly submits its rejoinder in the following paragraphs.

Rejoinder to Para 1:

The contents/statements are matters of record only.

Rejoinder to Para 2:

Over the years OPTCL has been continuously planning and implementing substantial projects to strengthen its transmission system for ensuring quality, adequacy & reliability of power supply in the State based on requisition of DISCOMs and by approved Transmission Planning through system study.

Further, OPTCL has maintained a transmission system availability of 99.98%, which is the highest among utilities in the country, and has consistently maintained system voltage within the limits prescribed by the Grid Code. Consequently, OPTCL has been delivering power of the highest quality.

Rejoinder to Para 3:

Year wise OERC approval and actual expenditure towards R&M for the period from 2013-14 to 2025-26 (up to Dec-2025) are given in the Table below.

(Rs. Cr.)

Financial Year	OERC Approved	Actual
2013-14	60.00	70.20
2014-15	93.00	100.31
2015-16	108.00	113.35
2016-17	110.59	149.53
2017-18	124.97	137.83
2018-19	111.00	115.13
2019-20	115.22	125.53
2020-21	115.22	103.07
2021-22	118.61	98.86
2022-23	110.50	114.14
2023-24	135.00	130.83
2024-25	135.00	149.02
2025-26 (upto Dec-2026	160.00	140.00

From the above, it can be observed that OPTCL has been effectively utilizing the R&M expenditure approved by OERC for periodical & condition-based maintenance and as a result of which its Transmission system availability has been consistently more than the specified norms.

It is worth mentioning that the existing sanctioned strength of OPTCL has been fixed in the year of 2013. However, OPTCL has adopted many advance technologies like

1. Implementation of SCADA in Grid Substations (under progress);
2. Introduction of unmanned operations through STAMS (under progress);
3. Implementation of SAP for asset management and human resource management; and
4. Adoption of the e-Office system for file movement.

The aforesaid technological advancements have significantly streamlined routine clerical functions as well as shift operations in Grid Substations. Furthermore, these initiatives have enabled OPTCL to optimally redeploy existing manpower to areas where their presence is most required, such as project execution, operation and maintenance activities, transmission planning, standardization, and other core functions.

Rejoinder to Para 4:

The outsourced / contractual workers are paid/ remitted minimum rate of wages as notified by the labour & ESI department, Govt. of Odisha for different skilled categories of employees from time to time or consolidated remuneration as fixed by the management of OPTCL in line with Govt. of Odisha.

Rejoinder to Para 5:

Contractual / outsource workers are engaged in OPTCL on an as-and-when-requirement basis through manpower / job outsourcing arrangements. The Contractors / Agencies are selected through a competitive tender process, which is generally conducted annually/ biennially, as applicable. It has been approved in prevailing organisation structure that some of the services like transport and attendant/peon services are to be outsourced as per requirement.

Rejoinder to Para 7:

The list of outsourced workers engaged in OPTCL is furnished as **Annexure- 01**.

Rejoinder to Para 8:

The detailed expenditure incurred towards R&M works under different heads executed by OPTCL during FY 2010-11 to FY 2025-26 (up to Dec-25) is furnished as **Annexure- 02**.

Rejoinder to Para 9:

At present OPTCL is operating with **201** numbers of GSS and **17094.767** Ckt. kms. of EHT lines as on 20.01.2026. Regular maintenance of all the GSS along with the associated lines are carried out through well experienced staffs. Further, time to time augmentation / renovation / modernization of required GSS and up gradation / replacement of essential EHT lines have been carried out by OPTCL to maintain quality power supply to the consumers. OPTCL is strategically replacing/upgrading conductors in old EHT lines on priority basis for reduction in Transmission loss and to cater the load demand reliably. Also up-gradation and Modernization of Old Grid Sub-stations are being done by replacing the obsolete/outdated equipment with the objective to keep the assets in efficient working condition. So, there are no such GSS & lines which have outlived or are not in a position to work.

Rejoinder to Para 10:

OPTCL has carried out construction of various Grid substation and Transmission lines as per the following fundings from Govt. of Odisha from 2020 to 2025. The projects are centrally monitored by the Project wing. The list of the projects are furnished at F-2 of the application.

Sl. No.	Scheme Name	Type of funding
1	SCRIPS	100% Grant
2	LVMS	Equity:Loan (30:70)
3	OTSSP-I	100% equity
4	OTSSP-II	Equity:Loan (30:70)
5	GEETC	Grant + Equity (Mixed)

2. The objections not specifically admitted & commented are deemed to have been denied.

PRAYER

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections and prayer of Sri Ramesh Ch. Satapathy while approving ARR and Transmission Tariff of OPTCL for FY 2026-27 and Truing up application for FY 2024-25.

By the Applicant
Through

Sr. GM (RT&C)

Bhubaneswar
January 27, 2026

Annexure-01

List of Outsource Employees, Category wise and Division wise engaged by Outsourcing Branch

Sl No.	NAME OF THE AGENCY	Category	Place of engagement
1	M/S OMM SARALA SECURITY SERVICE PVT. LTD.	Data Entry Operator- 29	1) HQRS-23 2) SLDC-02 3) Store & Servvices Circle, BBSR-01 4)Telecom Division Bhubaneswr-01 5) Telecom Division Cuttack-01 6) Telecom S/D, BBSR-01
		Attendants- 49	1) HQRS - 29 2) CGM (O&M) -02 3) Deparment of Energy-02 4) Store & Servvices Circle, BBSR-01 5) SLDC -02 6) EHT (O&M) Division, Puri -01 7) EHT (Project) Division, Berhampur -01 8) EHT (O&M) Circle, Cuttack -01 9) EHT (Project) Division, Jharsuguda -01 10) EHT (O&M) Division, Jharsuguda - 01 11) Sr.GM(Elect.), Southren Zone, Berhampur-02 12) Sr.GM(Elect.), Western Zone, Burla-02 13)Sr.GM(Elect.), Nothern Zone, Balasore-04
2	M/S MANOJ KUMAR ROUTRAY	Graduate Technical Resource Personnel Electrical - 10 Telecom - 07 Junior Technical Resource Personnel Telecom - 02	**GTRP (Electrical)** 1) EHT (O&M) Division, Jayanagar-01 2) EHT (O&M) Division., Paradeep-01 3) EHT (O&M) Division, Cuttack - 01 4) EHT (O&M) Division, Choudwar-01 5) EHT (O&M) Division, Khurda - 01 6) EHT (O&M) Division, Puri -01 7) EHT (O&M) Division, Bhubaneswar -01 8) EHT (O&M) Division, Balasore -02 9) EHT (O&M) Division, Chainpal -01 **GTRP (TELECOM)** 1) Telecom Division, Jeypore-01 2) Telecom Division, Meramundali-01 3) Telecom Division Cuttack-02 4) Telecom Division Jajpur Road-02 5) Telecom Division Bhubaneswar-01 **JTRP (Telecom)** 1) Telecom Division, Berhampur-01 2) Telecom Division, Bolangir -01
		Content Designer-01	HQRS-01
		Survey Assistant-01	HQRS-01
		CR Assistant-01	HQRS-01
		Legal Assistant-01	HQRS-01
		Nurse (Female) - 01	Power Hospital-01
		Physiotherapist - 01	Power Hospital-01
		Lab Technician - 01	Power Hospital-01
		Dresser - 01	Power Hospital-01
		Driver - 08	1) HQRS - 04 2) EHT (Const.) Division, Bolangir -01 3) Sr.GM(Elect.), Northen Zone, Balasore -01 4) EHT (Const.) S/D No-II, OPTCL, BBSR-01 5)EHT(O&M) Division, Bhubaneswar-01
		Attendant - 02	1) Power Hospital -01 2) Transit House - 01
		Creche-02	HQRS-02
		Gardener-02	HQRS-02

Details of expenditure made on Repair & Maintenance as per audited accounts

Head of Expenditure / Year	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26 (Upto Dec-2025 unaudited)
(i) Building	0.96	2.46	6.76	4.22	6.74	9.79	14.96	11.01	13.88	16.36	11.47	9.33	7.48	10.33	11.24	8.01
(ii) Plant and machinery	21.52	29.60	33.41	40.83	52.76	58.44	86.58	89.47	66.68	65.97	60.74	58.51	75.08	76.50	84.17	80.1
(iii) Lines cables and network assets	2.96	10.54	14.74	20.01	16.13	38.34	43.13	32.92	27.48	38.84	26.87	25.60	23.24	28.14	34.54	43.80
(iv) Electrical installations		-		1.24	19.04	1.84	1.15	0.90	1.25	0.96	1.65	0.99	1.65	8.96	10.22	1.08
(v) Vehicle	0.24	0.18	0.21	0.16	0.13	0.16	0.14	0.13	0.12	0.08	0.10	0.11	0.09	0.06	0.06	0.04
(vi) Furniture and fixtures	0.48	0.45	0.52	0.01	0.01	0.01	0.02	0.02	-	0.02	0.01	0.03	0.02	0.03	0.82	0
(vii) Office equipments	2.09	1.92	3.30	2.25	3.95	4.28	2.19	1.99	3.34	3.30	2.23	2.59	5.47	4.37	6.78	4.78
(viii) Other civil works	0.07	0.55	1.31	1.47	1.55	0.49	1.36	1.39	2.38			1.70	1.11	2.45	1.19	2.19
TOTAL	**28.32**	**45.70**	**60.25**	**70.19**	**100.31**	**113.35**	**149.53**	**137.83**	**115.13**	**125.53**	**103.07**	**98.87**	**114.14**	**130.83**	**149.02**	**140.00**

Annexure-02

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur
Bhubaneswar-751021

15 JAN 2026

NOTARISED

Case No: 121/2025
Filing No: 1

IN THE MATTER OF:

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022

... Applicant

AND

M/s. Tata Steel Limited, Athagarh, Anantapur, P.O. Dhurusia, Cuttack: 754027, Odisha

...Respondent

Affidavit verifying the application 15 JAN 2026

I, Shri Debasish Pattnaik, Son of Sri Pravat Kumar Pattnaik aged about 58 years, working as Head-TSL Power Plant, Athagarh, Anantapur, P.O. Dhurusia, Cuttack: 754027 do hereby solemnly affirm and state as follows: -

1. That I am working as Head-TSL Power Plant, Athagarh and I am duly authorized to swear this affidavit on its behalf.
2. The statements made in the petition are based on information and I believe them to be true.

PLACE: Bhubaneswar
DATE: 14.01.2026

Debasish Pattnaik

DEPONENT

JANMEJAYA RAUTRAY
NOTARY, GOVT. OF ODISHA
BHUBANESWAR
REGD. NO. ON-86/2012
Mob No-7978581217

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur
Bhubaneswar-751021

Case No: 121/2025
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AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022.

... **Applicant**

AND

IN THE MATTER OF:

M/s. Tata Steel Limited, Athagarh, Anantapur, P.O. Dhurusia, Cuttack: 754027, Odisha

...Respondent

The humble respondent above named most respectfully submit as under:

1. That M/s. Tata Steel Limited, Power Plant, Athagarh, a company incorporated under the provisions of the Companies Act, 1956 having its Registered Office at Bombay House, 24-Homi Mody Street, Fort, Mumbai 400001 and plant site-cum-correspondence office at Athagarh, Anantapur, P.O. Dhurusia, Cuttack: 754027, Odisha hereinafter referred as "TSL-Athagarh" / "Respondent".

2. That TSL-Athagarh has set-up a 2 x 67.5 MW power plant at Athagarh, Anantapur, P.O. Dhurusia, Cuttack: 754027, Odisha.

3. TSL-Athagarh is submitting the following points on the application of OPTCL for determination of Annual Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 for kind review and necessary action by the Hon'ble Commission.

Dobasi 8.2

4. Human Resources Expenses:

That OPTCL has projected Employee Cost expenditure at Rs. 531.52 Crore for FY 2026-27 against Rs. 488.63 Crore as approved by the Commission to be spent during FY 2025-26. The summary of Employee Expenses of OPTCL for the last sixteen financial years is furnished below.

Summary of Employee Expenses

Financial Year	Proposed	Approved	Actual
2010-11	865.13	279.56	173.11
2011-12	952.06	338.14	279.56
2012-13	655.36	318.48	268.59
2013-14	341.2	289.3	191.70
2014-15	361.38	318.18	309.59
2015-16	310.02	305.23	285.95
2016-17	399.56	292.55	382.44
2017-18	462.33	304.5	380.32
2018-19	419.57	360.4	375.65
2019-20	421.99	419.77	394
2020-21	466.22	415.87	373.19
2021-22	532.73	457.88	474.83
2022-23	526.53	477.19	
2023-24	508.76	449.08	
2024-25	582.06	488.63	
2025-26	554.05	488.63	
2026-27	531.52		

OPTCL may provide a detailed employee list cadre wise approved sanctioned strength by Govt. of Odisha vis-a-vis actual post filled up and post laying vacant.

The cost break-up of the employee expense is provided below:

Debasish Pattnaik

Sl. No	Particulars	Prev. Year 2024-25	Curr. Year 2025-26	Ensuring Year 2026-27
A	**Salary & Allowance**	1	2	3
1	Basic Pay	151.82	158.83	159.57
2	Dearness Allowance	79.79	96.89	102.12
3	House Rent Allowance	25.25	23.89	25.77
4	Medical Allowances	7.66	8.34	8.38
5	Conveyance Expenses (Allowance + Reimbursement)	4.13	4.08	6.28
6	Other Allowance	1.63	1.70	1.81
7	Bonus	0.18	0.20	0.20
8	Stipend for New Recruitment	8.09	4.05	5.70
9	Stipend to Apprentice	1.45	2.00	2.08
10	Arrear Salary for Wage Board Revision			
	Sub-total (A)	280.00	299.59	311.91
B	**Additional Employee Cost**			
1	Out Sources Engagement	3.78	4.34	7.01
	Sub-total (B)	3.78	4.34	7.01
C	**Other Employee Cost**			
1	Leave Travel Concession	0.15	0.59	0.59
2	Honorarium	0.10	0.12	0.19
3	Ex-gratia	6.44	6.50	7.92
4	Staff Welfare Expenses	4.48	7.94	12.02
5	Other Employee Cost	-	0.03	0.04
6	Capacity Building Charges	1.30	2.00	2.40
	Sub-total (C)	12.48	17.19	23.16
D	**Terminal Benefits**			
1	Pension	135.94	140.02	144.22
2	Gratuity	13.22	13.62	14.03
3	Leave Salary	19.91	20.51	21.12
4	Other (including contribution to NPS)	24.46	24.99	26.47
	Sub-total (D)	193.53	199.14	205.84
E	**Total Employees Cost (A+B+C+D)**	489.78	520.26	547.93
F	Less: Employees Cost Capitalised	16.40	16.40	16.40
G	**Net Employee Cost (E- F)**	473.38	503.85	531.52

Debasish Pattnaik

1. **Basic Pay and Grade Pay:** Basic Pay and Grade Pay proposed for FY 2026-27 = Rs. **159.57** Cr. is based on actual cash flow for FY 2025-26 with additional increment of 3% and average number of employees. OPTCL is planning to recruit 250 Nos. employees during FY 2025-26 and 50 Nos. in FY 2026-27.
2. **DA:** OPTCL proposed 64% DA for FY 2026-27, considering Finance Dept guidelines. However, actual increases in DA may be reviewed.
3. **HRA:** OPTCL proposed HRA @19%. Actual cash flow may be considered.
4. **Outsourcing:** OPTCL is functioning with 50% of manpower and has outsourced services. Accordingly, Rs. 7.01 Cr. has been proposed towards payment to outsourced personnel. The same can be reviewed.
5. OPTCL is planning to recruit 250 Nos. employees during FY 2025-26 and 50 Nos. in FY 2026-27 and has proposed Rs.05.70 Cr. towards stipend for the new recruiters. Considering the past trend of recruitment the same may be reviewed.
6. Actual addition of employees is lesser than the approved. Stipend and employee cost should be approved by reviewing proposed addition of employees.
7. Terminal benefits should be reviewed on an actual cash flow basis.

Hence the Employee cost Expenses of OPTCL for FY 2026-27 may be approved accordingly by the Hon'ble Commission.

5. Repair and Maintenance (R&M) expenses

That OPTCL has projected Repair and Maintenance Expenses at Rs. 259.65 Cr for FY 2026-27 against Rs. 160 Crs as approved by the Commission to be spent during FY 2025-26.

The summary of Repair and Maintenance (R&M) expenses of OPTCL for the last sixteen financial years is furnished below.

Summary of R & M Cost

Financial Year	Proposed	Approved
2010-11	98.14	60
2011-12	93.89	75
2012-13	95.46	95
2013-14	108.91	60
2014-15	146.77	93
2015-16	154.11	108
2016-17	170.66	110.59
2017-18	155.11	124.97
2018-19	156.19	111
2019-20	115.22	115.22
2020-21	140.59	115.22
2021-22	151.1	118.61
2022-23	148.04	110.5

Debasish Pattnaik

2023-24	164.34	135
2024-25	169.3	135
2025-26	217.7	160
2026-27	259.65	

It is respectfully submitted that R&M cost of OPTCL for FY 2026-27 may be approved accordingly by the Hon'ble Commission.

6. Administration & General Cost

That OPTCL has projected Administrative and General (A&G) expenditure at Rs. **46.95 Crs** for FY 2026-27 against Rs. **42.46** Crs as approved by the Commission to be spent during FY 2025-26.

The summary of Administrative and General Expenses of OPTCL for the last sixteen financial years is furnished below.

Summary of A&G Cost

Financial Year	Proposed	Approved
2010-11	26.99	15.14
2011-12	38.34	18
2012-13	39.11	21.25
2013-14	23.09	22.39
2014-15	25.46	24.01
2015-16	32.36	24.37
2016-17	25.58	24.66
2017-18	26.11	25.6
2018-19	27.23	26.44
2019-20	28.07	27.55
2020-21	28.66	28.72
2021-22	38.13	30.35
2022-23	43.18	37.73
2023-24	47.07	40.28
2024-25	51.13	37.05
2025-26	49.8	42.46
2026-27	46.95	

Debasish Pakhaen

The Hon'ble Commission may review the Inspection fee expenses and training expenses. Details of the training calendar and its benefits may be checked.

7. Depreciation Cost

That OPTCL has projected depreciation expenditure at Rs. 337.09 Crs for FY 2026-27 against Rs. 284.33 Crs as approved by the Commission to be spent during FY 2025-26.

The summary of Depreciation of OPTCL for the last sixteen financial years is furnished below.

Summary of Depreciation Cost

Financial Year	Proposed	Approved
2010-11	153.31	76.6
2011-12	156.4	79.42
2012-13	155.99	78.57
2013-14	172.85	89.4
2014-15	176.02	92.71
2015-16	197.72	107.48
2016-17	150.5	101.45
2017-18	192.59	130.76
2018-19	217.9	145.43
2019-20	186.03	162.06
2020-21	208.59	195.59
2021-22	276.5	232.95
2022-23	263	233.57
2023-24	293.96	269.54
2024-25	320.03	275.67
2025-26	356.57	284.33
2026-27	337.09	

- Norms of tariff regulations and rates as specified in the Transmission Tariff regulations should be considered.
- The depreciation should be determined after due scrutiny.

Debabrata Pattanaik

TATA STEEL LIMITED

8. OPTCL has only considered 275.35 Cr towards miscellaneous receipts which needs to be checked prudently. As per regulation 8.30 & 8.40 of Transmission Tariff Regulation all these expenses are to be deducted in full from the ARR for the purpose of calculation of tariff of OPTCL.

9. **Annual Revenue Requirement:**

That the OPTCL has given the proposal for an annual revenue requirement of Rs. 1765.40 Crore for FY 2026-27 against Rs. 1331.02 Crore as approved by the Commission to be spent during FY 2025-26.

The summary of ARR of OPTCL for the last fourteen financial years is furnished below.

Financial Year	Proposed	Approved
2011-12	1435.88	579.34
2012-13	1348.46	612.53
2013-14	874.74	597.87
2014-15	988.8	641.3
2015-16	1008.36	630.94
2016-17	975	623.25
2017-18	1013.63	639.4
2018-19	990.65	659.95
2019-20	861.27	706.71
2020-21	966.44	713.84
2021-22	1307.17	792.93
2022-23	1247.14	831.95
2023-24	1102	896.18
2024-25	1380.69	913.7
2025-26	1663.33	1331.02
2026-27	1765.40	

Hence the Annual Revenue Requirement of OPTCL for FY 2026-27 may be approved accordingly through a prudence check and based on the submission made above by the Respondent.

Debasish Pattanaik

TATA STEEL LIMITED

10. Determination of Transmission Charges

OPTCL has given the proposal for transmission charges @ **35.61 P/U** for FY 2026-27 against 25.5 P/Unit as approved by the Commission during FY 2025-26. The proposed Transmission Tariff of **35.61 P/U** is very high and should not be permitted. This will adversely affect the RST of the DISCOMS and will be a huge burden on the consumers of Odisha.

It is respectfully submitted that thermal power plants, including Captive Power Plants (CPPs), are presently operating under significant commercial stress due to limited capacity utilisation, primarily on account of availability of renewable power at comparatively lower tariffs during solar hours. Any further increase in transmission charges will exacerbate this stress and directly inflate the cost of thermal power generation, which is already impacted by escalating fuel costs, logistics expenses, maintenance overheads, and labour costs. Despite these challenges, thermal power plants continue to play a critical role as the backbone of grid reliability by providing firm capacity during peak demand periods and non-solar hours, a function that intermittent renewable sources are presently unable to fully substitute.

Any upward revision in transmission charges will ultimately be borne by CPP consumers and industrial end-users, thereby increasing the cost of final products, eroding profitability, and adversely affecting industrial competitiveness. Such cost escalation may discourage capacity utilisation, defer fresh investments, and negatively impact the overall economic growth and investment climate of the State. It is further submitted that the additional transmission charges proposed by OPTCL appear to stem from internal inefficiencies, sub-optimal planning, or avoidable operational expenditures, which ought to be addressed through prudence checks and efficiency improvements rather than being passed through to consumers. In view of the above, it is respectfully prayed that the Hon'ble Commission may review the transmission charges as proposed by OPTCL and may reduce the transmission charges substantially.

11. The proposal by OPTCL to disallow the rebate on prompt payment for Open Access customers, particularly Long & Medium-Term Open Access customers, needs to be carefully reviewed in the context of its impact on customer relations, operational efficiency, and regulatory guidelines.

While OPTCL has cited that there is no provision for rebate for early payment in the Open Access Regulations of 2020, the previous practice of offering a 2% rebate for payments made within two days was beneficial in encouraging timely payments and improving the cash flow for OPTCL. Discontinuing this rebate may have adverse effects on the payment

behavior of Open Access customers, leading to potential delays in payment and reduced financial liquidity for OPTCL.

It is also essential to consider the implications of such a move on the competitiveness and attractiveness of Odisha's transmission system to potential Open Access customers. Providing financial incentives, such as the prompt payment rebate, could serve as a mechanism to retain customers and ensure a smoother cash flow for OPTCL. Additionally, a shift in policy might need to be discussed and approved by the Commission to ensure it aligns with the broader regulatory framework and customer service goals. In light of these factors, it is proposed that OPTCL may reconsider the discontinuation of the rebate, or alternatively, propose a revised rebate structure that balances the financial interests of both OPTCL and its Open Access customers. The Commission's input and further deliberation on the matter may be necessary to ensure that the policy is fair, transparent, and in the best interest of all stakeholders.

12. The Open Access Regulations, 2020 treat the DISCOMs and other Open Access users like CGP, and Industrial Consumers on the same footing. However, exceptions is being carved out, wherein the DISCOMs need not submit their contracted quantity and are allowed to pay Transmission Charges on the actual energy transacted, whereas the other OA customers like CGPs, Industries are being forced to pay the Transmission Charges on the Contracted Quantity. Further, OPTCL has proposed to do away with the prompt payment rebate for OA customers like CGPs and Industries while allowing the prompt payment rebate benefit to DISCOMs. This type of differential treatment is against the Open Access Regulation, Grid Code, and statutory provision under the Electricity Act 2003. Therefore, it is requested that the Commission to treat all the Transmission Users i.e. CGPs, Industries, and DISCOM on the same footing with provision for charges, and rebates on the same principle without any discrimination.

13. Transmission Loss:

OPTCL has proposed transmission loss at 3.05%. In conformity with the power sector reform, OPTCL needs to reduce the transmission loss significantly. We propose to approve transmission loss of OPTCL at 2.5%.

That OPTCL has not yet identified the areas where loss is maximum and OPTCL needs to formulate action plans for loss reduction. OPTCL should inform the methodology adopted to estimate the transmission loss for every year. OPTCL should have undertaken energy audits of lines and substations to know the quantum of transmission loss in the system. Proposing the transmission loss arbitrarily without giving the breakup of the losses in different components of transmission system i.e., lines, substations, power transformers and auto transformers etc are not appropriate for the S.T.U. Thus proposing loss as per the

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TATA STEEL LIMITED

business plan is meaningless. There is enough measure by which OPTCL could reduce the Transmission loss. OPTCL should conduct energy audits and their standard performance should be monitored by a third party auditor appointed by the Commission so as to assess the actual performance of the licensees.

It is prayed before the Hon'ble Commission may kindly re-calculate and approve transmission loss accordingly.

14. That earlier CGPs used to inject inadvertent power to the grid and GRIDCO availed the benefits of inadvertent power. GRIDCO also used to pay the hydro pool cost towards the inadvertent power. However, from FY 2019-20 onwards GRIDCO has stopped making payment towards inadvertent injections. Hence, OPTCL became the ultimate beneficiary of such injection of inadvertent power. We pray to the Hon'ble Commission to direct OPTCL to submit the detailed list of inadvertent injection for each month by each CGP and consider the same as an additional injection to the grid accordingly to calculate the transmission loss. The data of inadvertent injection is available with OPTCL and SLDC for each month for each CGP who are connected to EHT transmission system of OPTCL. The entire stakeholder and consumers of Odisha will be benefitted by such methodology as the intra-state transmission loss will reduce significantly.

15. Given the significance of maintaining transparency and accuracy in the transmission system's performance, it is requested that OPTCL conduct a Third-Party Energy Audit of its transmission loss. The energy audit should be carried out by an accredited energy auditor in line with the guidelines specified by the regulatory authorities.

The requirement to conduct an annual energy audit is crucial not only for assessing transmission losses but also for identifying potential inefficiencies and implementing corrective actions that can help in optimizing the system's overall performance. This audit will provide an independent, unbiased evaluation of the transmission system's energy losses and help in formulating strategies for loss reduction, which will ultimately contribute to improving the operational efficiency and financial health of OPTCL.

16. Open Access Charges:

Each year Hon'ble OERC informed OPTCL to submit 400 kV, 220 kV, 132 kV Power Transformer and EHT lines loading. OPTCL should make a practice to submit the Power flow data for 400 kV, 220 kV line and 132 kV line and its loading and the entire Auto-transformer loading, Power Transformer and ICT loading along with the ARR application. Moreover, by submitting only power transmitted on the peak demand day will not solve the purpose. In order to ascertain the margin availability, OPTCL may be directed to submit the maximum power handling capability, power flow and % loading of all the 400 kV, 220

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kV, 132 kV line and Power Transformer, Auto Transformer, ICT Transformers. It is also desired that OPTCL should conduct load flow analysis to handle around 2000-3000 MW differential load in appropriate manner.

Once these data are made available, it can be ascertained that, there are sufficient margin is available in the transmission network and in order to utilize it fully, STOA should be promoted and the charges for the same may be kept at 1/4 of the MTOA and LTOA charges and necessary amendments in the regulations may be made.

17. Introduction of Reactive Energy Charges:

OPTCL has proposed to introduce Reactive Energy Charges of 3 Paise / kVARh which is very high and this proposal of OPTCL may be rejected.

18. Levy of Grid Support Charge for connectivity:

OPTCL has submitted an application to the Hon'ble OERC on 26.06.2024, to determine and approve the imposition of Grid Support Charges for industries with Captive Generating/Cogeneration plants that operate alongside the OPTCL grids.

The case was registered as OERC Case No.-44/2024. In an order dated July 6, 2023, the High Court suggested that if OPTCL wishes to pursue the imposition of Grid Support Charges, they should file a separate application with the OERC. The court emphasized that the OERC, under Section 181 of the Electricity Act, should examine the justifiability of such charges. Hon'ble Commission in order dated 09.07.2024 in case no 44 of 2024 has directed OPTCL to submit a consolidated report considering certain queries. OPTCL has submitted the report on 29.01.2025.

19. It is prayed before the Hon'ble Commission that the levy of Grid Support Charges (GSC) on Captive Generating Plants (CGPs) be abandoned. CGPs are operated by industries that already have a contract demand with the respective DISCOMs, which means they are contributing to the grid through their contracted capacities. The imposition of GSC on CGPs would lead to a scenario where industries are effectively being charged twice for grid support – once through their contract demand with DISCOMs and again via the proposed GSC.

This double charging would result in an unfair financial burden on industries that are already supporting the grid by paying for their contractual obligations. Such a practice could discourage further industrial investments in renewable energy projects, which is counterproductive to the state's objectives of promoting sustainability and industrial

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growth. Therefore, in the interest of fairness and to avoid unnecessary financial strain on industries, OPTCL should abandon the proposal to levy GSC on CGPs. This would ensure that industries are not unfairly penalized for their contribution to the grid, while also promoting the continued growth of renewable energy in Odisha.

20. It is proposed that OPTCL should proactively prepare and maintain a monthly status report outlining the available transmission lines, substation details, bay availability, and transformer capacity. This would enable prospective developers to assess the existing infrastructure and apply for an NOC for grid connectivity before submitting their applications to the RE nodal agency. By making this information accessible, OPTCL can streamline the process for developers, allowing them to submit their grid connectivity applications with more certainty.

Under the current practice, OPTCL does not conduct a prepaid system study unless the project has received approval from a nodal agency. However, it is recommended that OPTCL issue the NOC for grid connectivity based on the available infrastructure information, without requiring a prepaid system study at this early stage. The detailed prepaid system study can be conducted later, once the project has been approved by the relevant nodal agency. This approach would help accelerate the approval process and ensure timely facilitation of renewable energy projects in Odisha, while ensuring that the system remains aligned with the capacity of existing transmission infrastructure.

21. OPTCL may be directed to submit the current status of the 765 kV transmission network plan, specifically for the two 765 kV ISTS lines: Angul to Gopalpur and Angul to Paradeep, as well as the status of the 765 kV substation in the Kolabira area. In addition, OPTCL should provide detailed updates on the progress of transmission projects such as the Paradeep-Mahakalapada 765 kV line, the 400 kV substations at Joda, Ersama (Paradeep), and Neulapoi.

Furthermore, OPTCL should inform the Commission about the likely transmission and capacity charges for these projects, ensuring that they are transparent and justifiable. These charges should be subject to a prudence check by the Hon'ble OERC to assess whether they adequately serve the interests of consumers and the state. In cases where the charges do not align with the best interests of the consumers and the state, the Commission may not approve the proposed capital expenditure plan and tendering process. In such instances, OPTCL should be instructed to initiate a fresh tendering process under the Intra-State Transmission Plan to ensure that the most optimal and cost-effective solutions are selected.

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22. Transmission business being a capital intensive projects requires long term planning. Therefore, Hon'ble OERC may direct OPTCL to submit MYT tariff and long term Business Plan based on which Investment Plan should be provided.

23. That Intrastate transmission system should be developed in a coordinated manner in consultation with CTU, State govt., Generating companies, Regional Power Committees, CEA & licensees. However such grid coordination meetings are not happening regularly. It is proposed that the grid coordination committee meeting may be conducted regularly. Nos of industries are facing lots of difficulties in getting grid connectivity and enhancement of contract demand. Even the honorable OERC has directed to hold a meeting of OPTCL with DISCOM on a monthly basis to ensure smooth operation of the power sector and MOM to be furnished to OERC. The honorable OERC in its earlier transmission tariff order dated 13.02. 2024 in case no. 113/2023 has directed to submit the revised 14th inter-state transmission plan of OPTCL for approval. OPTCL may kindly submit the status of the 14th inter-state transmission plan of OPTCL and stage wise implementation plan.

24. The Hon'ble OERC has published the OERC (Development of Intra-State Transmission Projects through Tariff Based Competitive Bidding in the State of Odisha) Order, 2022. OPTCL may be directed to submit an action taken report towards execution of new transmission projects. The honorable OERC has earlier directed OPTCL to standardized the transmission line tower, multi-circuit tower etc. the honorable OERC may pass appropriate order.

25. Further, it is proposed that OPTCL should set up an independent testing lab accredited by NABL for testing relays, meters, transformer oils so that such facilities can be availed by industries.

26. It is noted that OPTCL has claimed ₹0.35 Cr towards annual Grid Coordination Committee (GCC) expenses. However, the respondent seeks clarification from OPTCL regarding the number of GCC meetings conducted during FY 2023-24, FY 2024-25 and FY 2025-26. Additionally, OPTCL should provide details of the outcomes from each GCC meeting or make this information publicly available on its website for transparency and accountability.

The respondent further understands that, as per the provisions of Chapter 11, Clause 2 (2) of the Odisha Grid Code Regulation, 2015, there appears to be a lack of GCC meetings being held in the prescribed manner. It is crucial that the objectives of the GCC, which are to ensure efficient coordination between transmission, distribution, and generation entities, are met as per regulatory requirements. Therefore, OPTCL should clarify the status of GCC meetings, as well as any actions taken to address this issue, ensuring compliance with the

Grid Code and the effective functioning of the transmission and distribution system in Odisha.

27. It is proposed that OPTCL should conduct a feasibility study to assess the potential of converting the existing 26 numbers of 132 kV switching stations into 132/33 kV substations. This conversion would involve establishing additional bays and installing 132/33 kV transformers, thereby enhancing the capacity to accommodate the future load requirements of DISCOMs. The proposed upgrade would not only cater to the increasing demand from existing consumers but also provide a critical infrastructure platform for connecting future renewable energy (RE) projects, particularly solar power plants, into the grid. This conversion aligns with the growing need for decentralized and renewable energy sources, which are integral to meeting the State's sustainability and decarbonization goals. By expanding the grid infrastructure, OPTCL can ensure that the transmission network is future-proofed to handle an influx of renewable energy, which is expected to play a key role in Odisha's energy transition. Moreover, this initiative will reduce the load on existing substations and improve the overall grid stability, enabling efficient power distribution across the state. Therefore, a comprehensive feasibility study by OPTCL will allow for a detailed assessment of technical, economic, and environmental implications, thereby ensuring that the infrastructure investments are both optimal and sustainable in the long term.

28. OPTCL should make a standard practice to prepare its ARR application and insert these regular features during the ARR application stage considering all relevant query of Hon'ble OERC. This will be quite helpful for the Respondents as well as for the officials of Hon'ble OERC for conducting proper analysis and scrutiny.

29. The Commission should direct OPTCL to engage with the Government of Odisha to secure funding for economically unviable projects and other critical infrastructure developments that serve the larger interest of the State. Many transmission projects, though essential for grid reliability, regional development, and equitable power access, may not be financially viable solely through tariff-based funding. Government grants can bridge this gap, ensuring that crucial transmission infrastructure is developed without placing an excessive financial burden on consumers. Additionally, state-funded support for such projects would facilitate balanced regional growth, promote industrialization in remote areas, and enhance overall energy security. A coordinated approach between OPTCL and the Government will help in prioritizing strategic projects, optimizing resource allocation, and accelerating execution timelines. Therefore, securing grants for these projects is imperative to ensure a robust and resilient transmission network that supports Odisha's long-term energy and economic goals.

30. The Commission may direct OPTCL to continuously monitor the transmission system's operation and take proactive measures to prevent overloading or under loading which is essential for ensuring an efficient and reliable power network. Overloading can lead to equipment failures, increased technical losses, and reduced system lifespan, while under loading results in inefficient asset utilization and financial strain. By adopting innovative strategies such as dynamic load management, network reconfiguration, real-time data analytics, and grid optimization techniques, OPTCL can achieve optimal loading of the existing infrastructure. This will not only help in reducing transmission losses but also enhance grid stability and improve overall system efficiency. Additionally, leveraging advanced technologies like AI-driven predictive maintenance, demand forecasting, and adaptive grid control will enable a more resilient and cost-effective transmission network. Therefore, continuous monitoring and proactive intervention are necessary to maximize the operational efficiency of the transmission system, ensuring sustainable and economical power transmission for all stakeholders.

31. The Commission's earlier directive for coordinated development of the intra-state transmission network, ISTS, and downstream distribution infrastructure is crucial to ensure optimal asset utilization, financial prudence, and grid stability. Many substations under OPTCL remain under loaded due to the absence of necessary downstream infrastructure from DISCOMs, leading to stranded assets and inefficient capital deployment. To avoid such inefficiencies, it is essential that OPTCL, DISCOMs, and CTU synchronize their planning and execution timelines. This will prevent unnecessary transmission investments that burden consumers with higher tariffs without delivering corresponding benefits. Moreover, ensuring that transmission system strengthening projects align with actual load growth will reduce the risk of power evacuation bottlenecks, voltage fluctuations, and increased transmission losses. A structured, joint planning approach will enhance grid reliability, improve network efficiency, and protect consumer interests. Therefore, the Commission's directive to mandate discussions among stakeholders before execution is a necessary step to ensure a well-integrated, cost-effective, and sustainable power transmission system.

32. Therefore, Transmission system upgrades should be strategically planned rather than implemented in an ad-hoc manner. The Commission should direct that no transmission system strengthening proposals should be executed without the prior approval of the Commission. Strengthening measures should be backed by technical and economic justifications, as required by OPTCL's license conditions and tariff regulations. Transmission projects involve significant capital investments that ultimately impact consumer tariffs. Prior Commission approval ensures that OPTCL implements only necessary and cost-efficient projects. Avoids excessive capital expenditure, which could

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lead to unjustified tariff hikes for consumers. Aligns investments with the approved capital expenditure (CAPEX) plans under the tariff regulations.

33. OPTCL should be directed to consider the meter data to assess the month-wise transmission loss in intra-state transmission systems including losses at different voltage levels (i.e. 132 kV, 220 kV and 400 kV levels).

34. The power utility has proactively implemented multiple loss reduction strategies, including system automation, load bifurcation, and digitization of the grid. Despite these extensive efforts, the anticipated loss reduction has not been realized, proving that systemic challenges persist beyond mere technical upgrades. Load bifurcation improves local reliability, but its impact on overall transmission loss is minimal, as power still needs to travel long distances from generation to consumption points. The introduction of ring systems instead of radial networks has increased network stability and redundancy, but transmission losses are still governed by physical distance and resistance of the conductors. Advanced transformers and low-loss conductors have been introduced, yet their impact on overall losses will be realized only after complete replacement of old equipment across the entire network. Bay control units (BCUs) and digital substations provide enhanced monitoring and real-time control over power flow, reducing inefficiencies. However, these tools primarily assist in identifying losses rather than eliminating them outright. Their full impact will be seen once corrective actions are consistently implemented over a longer duration.

35. It is proposed that Cyclone resilient robust electricity transmission and distribution infrastructure in coastal areas should be established by OPTCL. OPTCL may be directed to submit a report on how many mobile substations are available with them to meet the contingency situation during cyclone and their cyclone mitigation plan which has been earlier directed by honorable OERC. OPTCL has not taken action for the design of multi-circuit and multi voltage transmission lines. MOP document on reduction in ROW in urban and forest areas.

36. We request the Hon'ble Commission to kindly allow the Respondent to submit any additional submissions, memos, documents etc. as may be required and in general do all such things as may be required in connection with the above reply.

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TATA STEEL LIMITED

PRAYER

In the facts and circumstances stated above and in the interest of the parties and the larger interest of the State the Hon'ble Commission be pleased to pass appropriate orders to the effect that

1. ARR of OPTCL may be approved accordingly based on the submission made above.
2. The Transmission Charges should be reviewed and reduced substantially.
3. Transmission loss to be reduced considering the submission made for FY 2026-27.
4. Proposal of Reactive energy charges of 3 paise/KVARh should be rejected.
5. Proposal of OPTCL to levy of Grid Support Charge for connectivity may be rejected.
6. Each year truing up exercise and business plan approval should be carried out by Hon'ble commission through a process of public hearing.

Place: Bhubaneswar

Date: 14.01.2026

For M/s. Tata Steel Limited

Debasish Pattanaik

Authorized Signatory

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur
Bhubaneswar-751021

Case No: 121/2025
Filing No: 1

IN THE MATTER OF:

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022

... Applicant

AND

M/s. Tata Steel Limited, Athagarh, Anantapur, P.O. Dhurusia, Cuttack: 754027, Odisha

...Respondent

Letter of Authorization

I, Shri Debasish Pattnaik, Son of Sri Pravat Kumar Pattnaik aged about 58 years, working as Head-TSL Power Plant, Athagarh with M/s. Tata Steel Limited, Athagarh, Cuttack hereby authorize Sri Bibhu Swain, residing at K-8-82, Kalinga Nagar, Ghatikia, Bhubaneswar-751029 to be my representative to present the above case on my behalf before the Hon'ble Odisha Electricity Regulatory Commission relating to my above reply and to submit any additional submission, memos, documents etc. as may be required and in general do all such things as may be required in connection with the above reply.

For M/s. Tata Steel Limited

Place: Bhubaneswar

Date: 14.01.2026

Debasish Pattnaik

Authorized Signatory

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
PLOT NO. 4, SAILESHREE VIHAR,
CHANDRASEKHARPUR, BHUBANESWAR-751021

CASE NO. 121/2025
FILING NO. 3

IN THE MATTER OF: (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

And

(ii) Truing up application for the FY 2024-25 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

AND
IN THE MATTER OF: Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

..... Applicant

vrs

M/s. Tata Steel Limited, Athagarh, Anantapur, P.O. Dhursusia, Cuttack, Odisha- 754027 and **16 others.**

..... Objectors

Rejoinder to the objections raised by the Objector M/s. Tata Steel Limited, Athagarh.

The humble applicant above named

MOST RESPECTFULLY SHEWETH:

1. That, the Objector M/s. Tata Steel Limited, Athagarh vide affidavit dated 16.01.2026 has raised certain submissions on ARR & Transmission Tariff Application of OPTCL for FY 2026-27 and Truing up application for FY 2024-25. In reply, OPTCL submits its rejoinder to the submissions in the following paragraphs.

Allahabad Collector Bank

Rejoinder to Para 4 to 9:

The respondent has submitted statistical data of the previous years comparing the proposed vis-à-vis approved in respect of expenses towards human resource expenses, R&M expenses, A&G expenses, depreciation and RoE with a request to approve accordingly after due scrutiny. In this regard, it is pertinent to mention that OPTCL has submitted its ARR application for FY 2026-27 as per the various provisions stipulated in OERC (Terms & Conditions for Determination of Transmission Tariff) Regulations, 2014 and directions of the Commission passed in different orders with proper justifications.

Further, details of Sanctioned strength vis-a-vis actual man in position is furnished below:

Manpower position as on 20.01.2026			
Category	**Sanctioned Strength**	**MIP**	**%**
Executive	2040	1400	68.63%
Non-Executive	3862	1342	34.75%
Total	**5902**	**2742**	**46.46%**

Rejoinder to Para 10:

Determination of Transmission Charges:

The Transmission infrastructures are created considering the demand and request of the DISCOMs / Industries from time to time, after due approval form the Hon'ble OERC through Transmission Plan. Being a Deemed Transmission License, OPTCL has always endeavored to create the Transmission infrastructure for providing reliable and quality power to the consumers of DISCOMs. Accordingly, every year OPTCL is adding more transmission assets to meet the requirement of DISCOMs. Transmission Charge is arrived at 35.61 paise per unit by dividing the total ARR of OPTCL with the recent realistic MU projections of DISCOMs and recovered from them on a monthly basis. This rate will decrease if DISCOMs drawal increases. In fact, OPTCL has consistently advocated for the recovery of transmission charges based on contracted capacity, in line with the practice followed by STUs in other states.

The proposed Transmission Charge of 35.61 p/u has been derived by considering the recent realistic energy demand projections of 41,849.28 MU as communicated by the DISCOMs & other LTOA customers and the ARR figures have been arrived by OPTCL justifying component wise projections as per the provisions

contained in OERC Transmission Tariff Regulations, 2014, OPTCL's Audited Accounts for FY 2024-25, all relevant data/information and materials. The details of projections are submitted in page 30 of the present ARR application of OPTCL for FY 2026-27. Moreover, OPTCL had furnished all requisite information and details as per the prescribed formats of the Hon'ble Commission with full justifications.

Hence, mere apprehension of the respondent towards imposition of excessive burden on Discoms seems to be inappropriate and unacceptable which is likely to be rejected at this juncture. Moreover, the contention of the stake holder operating in the value chain of electricity needs to appreciate the fact that the cost recovery has to be in full so as to make the sector sustainable.

Rejoinder to Para 11 & 12:

The Hon'ble Commission vide letter no. DIR (T)-332/2008/77 dated 01.02.2021 has clarified that the DISCOMs do not come under the new regulation "OERC (Terms and conditions of Intra state open access) Regulations 2020" and they are governed under OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014. A copy of the said letter is provided as **Annexure-01.** Further, the details of provision of Rebate have been meticulously mentioned in page no: 59 of our ARR application for FY 2026-27 as per the said OERC Regulations.

Rejoinder to Para 13-15:

Transmission Loss

The argument for transmission loss of OPTCL at 2.5% is without any justification. The actual transmission loss for the period **Apr' - Sep' 2025** is calculated to be **3.07%** as shown in the ARR & TT application for FY 2026-27 (page-205). This figure is **less than the actual** transmission loss during last year **i.e. 3.09%** for **FY 2024-25.** In fact, OPTCL had projected a Transmission loss of 3.05% for FY 2025-26, but Hon'ble Commission had set a target of 3.00% which could not be achieved yet.

In OPTCL system, the transmission loss is purely technical loss and a function of real time injection of power by a number of generators, system configuration and power flow requirements at different load centers. It depends on many parameters / factors such as distance and mismatch between generation and load centers, types of load, reactive power compensation, voltage profile, seasonal variation of demand load etc. Thus, OPTCL does not have much control over the same at any point of time. The transmission system of OPTCL operates as an integral part of the Eastern Region Grid

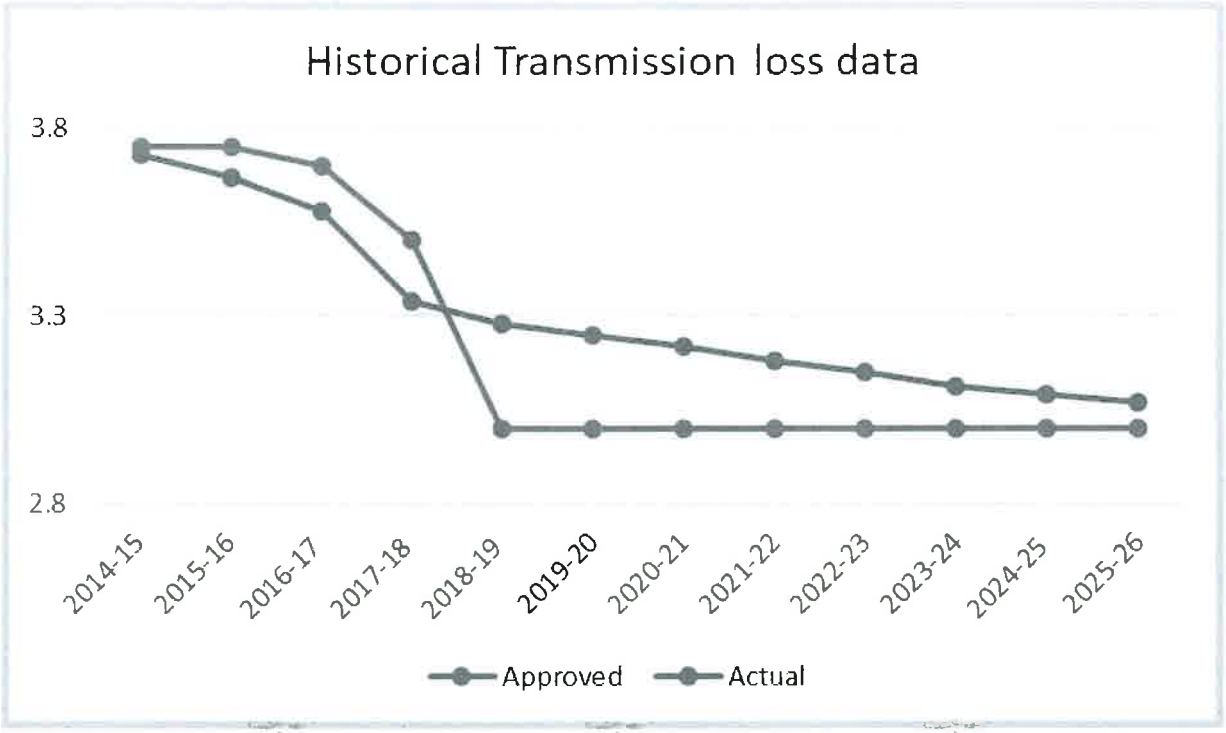
to serve the internal demand of the State as well as to carry out import and export of power depending upon the system demand.

As a matter of fact, some grid s/s and lines are being constructed in many remote and deprived areas funded under Central & State Govt. schemes in the interest of public. Additional length in EHT lines and Sub-stations in under-loaded areas are also responsible for increase in transmission loss.

Transmission Loss in OPTCL network is in a gradually reducing trend over the years i.e. from 3.73% during 2014-15 to 3.09% in 2024-25 and has remained 3.07% within 1st six months of FY 2025-26 mainly due to addition of infrastructure and various system strengthening works taken up by OPTCL. The actual losses incurred over the years by OPTCL have been within the margin allowed by Hon'ble Commission up to the year FY 2017-18. However in FY 2018-19, the commission set the loss at 3.00% though the projected transmission loss was at 3.25% and thereafter the commission has been pegging the transmission loss at the same level though loss projected by OPTCL remained in a downward trend.

Year	Tr. Loss proposed	OERC Approval	Actual
2014-15	3.75%	3.75%	3.73%
2015-16	3.75%	3.75%	3.67%
2016-17	3.70%	3.70%	3.58%
2017-18	3.50%	3.50%	3.34%
2018-19	3.25%	3.00%	3.28%
2019-20	3.25%	3.00%	3.25%
2020-21	3.20 %	3.00%	3.22%
2021-22	3.15%	3.00%	3.18%
2022-23	3.10%	3.00%	3.15%
2023-24	3.10%	3.00%	3.11%
2024-25	3.05%	3.00%	3.09%
2025-26	3.05%	3.00%	3.07% (1st six months)





From the table given above, it is also clear that each year upto FY 2017-18, the transmission loss achieved by OPTCL has remained at a level lower than the approved figures by Hon'ble commission and from FY 2018-19 the target set by Hon'ble OERC appears to be very stiff which was hard to achieve though the trend of lesser transmission loss year after year has been achieved.

It may kindly be appreciated that transmission (technical) losses are inevitable in power systems due to the fundamental laws of physics and become increasingly difficult to reduce beyond a certain threshold. Further, at the all-India level, transmission losses across different regions have consistently remained above 3.12%. To substantiate our viewpoint, the transmission loss data for various regions is presented below for the kind consideration of the Hon'ble Commission.

Transmission loss of Different Regions for FY 2023-24

Region	**Transmission loss**
Northern Region	3.15%
Western Region	3.12%
Southern Region	3.46%
Eastern Region	**4.24% (Odisha- 3.11%)**
North Eastern Region	3.89%

(Courtesy: General Review 2025, Government of India, Ministry of Power, CEA attached as **Annexure-02**)

GOVT. OF ODISHA ON 20/9/25 05.07.2030

It may be observed that OPTCL's transmission loss of 3.07% is lower than the average transmission losses of all regions.

However, as a responsible Transmission utility, OPTCL is making an all-out effort to reduce the transmission loss further by undertaking various **system operation and loss reduction measures** by implementing the emerging technologies like **system Automation**, load bifurcation, **modification in system configuration**, procurement of more efficient equipment, **Digitalization of grids** by using SAS, Protection system improvement using Busbar protection and Event Logger, Advanced Metering Infrastructure, **Conversion of Radial to Ring system,** construction of GSS at **higher voltage levels** (220kV & 400kV), Replacement of old conductors and Transformers etc. to bring it to **3.05% by FY 2026-27.**

Steps taken for Energy Audit

Under the PSDF funding, SLDC is implementing the SAMAST project. After operational of SAMAST project, detailed energy auditing is possible.

Regarding inadvertent power

CGPs are not firm sources of power as they are essentially meant for the captive consumption. OPTCL does not agree to the assumption of the respondent that around 985MU of inadvertent power will be injected into the OPTCL system in a year considering the CGP capacity 9850MW. From the Pool Cost data provided by GRIDCO for the first six months of FY 2025-26, it is observed that the total inadvertent power injection is 230.643MU which has been already considered while calculating the Transmission loss of 3.07% in form T-6. Hence, Transmission loss as suggested by the Objector is not just and proper. Details of inadvertent power injected by CGPs in FY 2025-26 till September is furnished as under:

Month	**Quantum of inadvertent power (MU)**
April-25	38.31
May-25	38.79
Jun-25	39.97
Jul-25	30.39
Aug-25	43.27
Sep-25	39.92
Total	**230.64**

Nabs Electricity

Further, it is submitted that Transmission charge is being computed on Open access transactions based on scheduled energy. Hence, OPTCL does not reap any benefit out of inadvertent power.

Rejoinder to Para 16:

Open Access Charges:

The system peak demand of **7069.89 MW** was touched on 12.08.2025 at 24:00 Hr. Statement on the loading pattern of the existing transmission system (400kV, 220kV & 132kV EHT lines along with loading on ICT, Auto & power transformers) corresponding to the peak demand is submitted in compliance to the OERC queries on ARR application of OPTCL for FY 2026-27 which will submitted to your good self along with this reply. OPTCL has already conducted load flow study considering different load scenarios i.e. Summer peak, Winter lean, High hydro, Low Hydro & Solar Peak in the Revised 14th Intra-state Transmission Plan of Odisha for FY 2022-23 to FY 2026-27, which has been duly approved by Hon'ble Commission vide case no. 08/2024. In the said report, percentage loading of all Transmission lines, ICTs, Auto & Power Transformers till FY 2026-27 have been mentioned. The Transmission infrastructures are being created considering the demand and requests of the DISCOMs/Industries from time to time after due approval form the Hon'ble OERC through Transmission Plan. DISCOMs and other LTA customers are responsible to bear the full approved ARR of OPTCL. STOA charge is being charged as per the Open Access Regulations, 2020.

Further, the revenue earned from STOA transactions is accounted for under Miscellaneous Income and is ultimately deducted from the Gross ARR to arrive at the net recoverable transmission charges to be recovered from consumers, including DISCOMs. Therefore, application of the 1/4th concept would result in an additional burden on domestic consumers. Further, as CERC regulations, the STOA rate is comparatively higher than LTA.

It is pertinent to mention that LTA consumers enjoy the first right and greater benefits compared to MTOA and STOA consumers. Therefore, for industries seeking a reliable, quality, and uninterrupted power supply, availing Long-Term Access (LTA) remains one of the most suitable options.

Rejoinder to Para 17:

Reactive Energy Charges:



As per Regulation 31(1) under Chapter-7 (IMBALANCE AND REACTIVE ENERGY CHARGES) of the OERC (Terms and Conditions of Intra-State Open Access) Regulations, 2020, payment for the reactive energy charges by open access consumers shall be in accordance with provisions stipulated in the State Grid Code or as may be specified in relevant regulations/orders of the Hon'ble Commission .

The Hon'ble Commission in Para 16 (page 5) of the order dated 05.02.2019 in Case No. 50/2017 has inter alia viewed that the provisional reactive energy charges of 3 paise/KVArH as allowed in the ARR order of OPTCL for FY 2018-19 continue for time being till a final justification is submitted by OPTCL in consultation with the stakeholders. However, despite raising reactive energy bills by SLDC since the beginning of FY 2025–26, no amount has been received in the Reactive pool account against Reactive Energy Charges to date due to non-payment by DISCOMs and other LTOA customers.

In view of the above, OPTCL proposes that 3paise/KVARh may be approved provisionally as Reactive Energy Charges for FY 2026-27.

Hence, the proposal of the objector to reduce the reactive energy charges as suggested by OPTCL is not just and proper.

Rejoinder to Para 18 & 19:

Levy of Grid Support Charge for connectivity:

The benefits derived by the CGPs with co-located loads are enormous. The benefits are in the nature of ancillary services which are not paid till now. The Grid support charges (GSC)/Parallel operation charge has been levied by different state Regulatory Commissions and upheld by APTEL and Supreme Court of India through various orders and hence proposed by OPTCL through a separate petition. OPTCL had filed an application (case No. 44 of 2024) on 26.06.2024 for determination and approval for levy of Grid Support Charges for industries having Captive Generating / Cogeneration plants and running in parallel with the Grids of OPTCL. Hon'ble Commission vide its order in case no. 44/2024 directed OPTCL to submit a consolidated report considering the observations/queries raised by the stakeholders in the earlier Cases filed by OPTCL. In compliance to above, OPTCL has filed the requisite report before Hon'ble Commission on 29.01.2025.

Further, it is submitted that a consumer connected to OPTCL network, pays demand charges for the contracted demand to concerned DISCOMs[. The rationale behind this arrangement is that the corresponding quantum of transmission corridor capacity is reserved for the respective consumer, and only the remaining available

capacity in the EHT network is allocated to other consumers. Moreover, it is observed that installed capacity of CGPs are much more than the contracted demand with DISCOMs.

However, it is observed that after synchronization with the grid, CGPs adversely impact grid quality through the injection of harmonics and other disturbances. To address such impacts and ensure grid stability, appropriate charges, namely Grid Support Charges, are required to be levied.

Further, it is submitted that OPTCL has proposed grid support charge factoring the contracted demand signed with DISCOMs by CGPs. So, double charging issue raised by the objector does not arise.

Rejoinder to Para 20:

Necessary system studies are invariably conducted and approvals are granted to RE developers applying for power injection or drawal following the completion of technical and field feasibility assessments.

Further, IT wing of OPTCL has developed a web portal i.e. ***Odisha Grid Insights*** **(OGrI)** portal to publish the key information related to OPTCL EHT Network. This portal will be updated on a monthly basis and will include the following details:

1. Geo-coordinates of all line assets under OPTCL.
2. Present loading data (Minimum & Maximum).
3. Projected load demand within the next 6 months.
4. Transformation capacity.
5. Network status, which will include:
    a. Spare feeders (equipped or not-equipped)
    b. Space available for feeder bays
    c. Possible take-off arrangements (by cable or by overhead)
    d. Evacuation facilities (radial mode or interconnected mode)
    e. Load category (percentage of industrial load vs. domestic load)

The portal is currently operational with most of the above information. The portal can be accessed at the following URL: **https://ogri.optcl.co.in**. This initiative will help RE developers to access the OPTCL network for finding potential injection points.

Rejoinder to Para 21:

Status of key Transmission projects is furnished below:

Project under ISTS

1. **765kV Angul – Gopalpur**
   a. Scheduled date of completion – December 2027.
   b. CERC yet to issue Transmission license to the L1 bidder under TBCB.
2. **765kV Angul – Paradeep**
   a. Scheduled date of completion – November 2026.

   b. CERC yet to issue Transmission license to the L1 bidder under TBCB.

Projects under OPTCL

1. **765kV Kolabira**
   - Approved under 21st CMETS-ER dated 22.08.2023
   - Land identification is in progress
2. **400kV Joda/Barbil (Basudevpur)**
   - Approved under 33rd CMETS-ER dated 05.08.2024
   - Land identification is in progress
   - Project will be executed by OPTCL upon finalisation of funding from Govt. and IP approval from Hon'ble Commission.
3. **400kV Ersama**
   - Scheduled date of completion – June 2026
4. **400kV Neulapoi**
   - Approved under 30th CMETS-ER dated 14.05.2024
   - Tender floated, work started

There is no provision of Capacity charges in the extant OERC Transmission Tariff Regulations, 2014. Since Gridco is procuring power through ISTS network, the transmission charges thereof is dealt by Gridco.

Rejoinder to Para 22:

It is intimated that the Business Plan of OPTCL for the 3rd Control Period, i.e., from FY 2024–25 to FY 2026–27, has been approved by the Hon'ble Commission vide Order dated 24.09.2025 in Case No. 20 of 2025.

Rejoinder to Para 23:

The Revised 14th Intra-State Transmission Plan of Odisha for FY 2022–23 to FY 2026–27 has been approved by the Hon'ble Commission vide Case No. 08/2024. Recently, the investment proposals for 37 projects were heard after inviting suggestions and objections from the general public.

Rejoinder to Para 24:

Initially construction of 400/220kV AIS S/S at Remuli along with associated lines was planned for TBCB . Subsequently, State Government after careful consideration have

been decided to construct 400/220kV AIS S/S Remuli(at Basudevpur) and establishment of 2x160 MVA, 220kV GIS S/S at existing Barbil GSS along with associated 400kV & 220kV lines on cost plus method instead of TBCB mode. Accordingly, at present, there is no proposal for execution of any project under TBCB mode.

OPTCL has standardized technical specifications for transmission line towers/steel poles, power transformers, switchgear, surge arresters, CTs, PTs/CVTs, conductors, insulators, fire fighting systems, lighting systems, AC/DC systems, etc., and continues to incorporate improvements as identified for further refinement

Rejoinder to Para 25:

OPTCL maintains an in-house oil testing laboratory that serves as the central facility for analyzing oil breakdown voltage, dissolved gas analysis and PPM measurements. A relay testing laboratory is also planned. OPTCL will approach the Government of Odisha for funding to obtain National Accreditation Board for Testing and Calibration Laboratories (NABL) accreditation for both laboratories.

Rejoinder to Para 26:

No GCC meeting has been conducted in FY 2023-24 and 01 no. GCC meeting has been conducted in FY 2024-25. The details of recent GCC meeting conducted is furnished below:

GCC meeting	Date of meeting
17th GCC meeting	17.01.2025
18th GCC meeting	03.09.2025

OPTCL has already sought agenda items from various stakeholders for the 19th GCC meeting. Further, upon finalization of the agenda, the GCC meeting will be convened shortly. The amount proposed under GCC head will be utilised fully.

Rejoinder to Para 27:

OPTCL will take up the proposal of converting Switching Station to Substation based on the demand projection of DISCOMs and the proposal received by RE developers on a case to case basis with the approvals of Hon'ble Commission.

Rejoinder to Para 28:

The respondent's suggestion has been noted and OPTCL will include the details of loading pattern in the ARR filing of the coming years. Invariably, OPTCL has been sharing the details of loading pattern of all the ICTs, Auto & Power transformers in L-9 format (OERC approved format) as a part of ARR filing every year. Further, loading details corresponding to the maximum demand of **7069.89 MW** on 12.08.2025 has been provided in Compliance to the OERC queries on ARR application of OPTCL in case no. 121/2025.

Rejoinder to Para 29:

Since the creation of transmission infrastructure requires huge investments, OPTCL always requests the state Government for financial support. State Govt. has been contributing 100% financial assistance in the shape of grant/equity in case of non-remunerative and contributing 30% equity support in case of remunerative projects.

Rejoinder to Para 30

To prevent overloading, regular system study has been carried out and augmented the network capacity as and when required. Priority has been given to use the under loaded network. As directed by Hon'ble Commission, regular meetings are being conducted with DISCOMs for creation and timely completion of downstream infrastructure for optimum utilization of transmission networks. New Transmission elements proposed by OPTCL to strengthen state evacuation are deliberated and approved in the CMETS-ER meeting, held on monthly basis which are further incorporated in National Transmission Network. At present, OPTCL is implementing the STAMS project, under which all network parameters will be monitored centrally. This will enable system operators to take prompt corrective actions, thereby enhancing grid stability and improving overall system efficiency. Further, OPTCL has planned for AI based inspection & maintenance of the Transmission lines and also planning for Asset Performance Management System with AI capabilities for predictive maintenance of its transmission assets.

Rejoinder to Para 31:

As per the provisions of Sections 39 and 40 of the Electricity Act, 2003, OPTCL, being the State Transmission Utility (STU), is responsible for the planning and development of the transmission infrastructure in the State of Odisha. OPTCL obtains inputs from DISCOMs, industries, and generators, and thereafter prepares a comprehensive Intra-State Transmission Plan considering various loading conditions. All new transmission proposals are duly approved by the Hon'ble Commission through

the Transmission Planning, Business Plan, and Investment Proposal approval process, wherein DISCOMs and the State Government are among the respondents.

Further, consultations are held with stakeholders through Transmission and Distribution Coordination Committee (TDCC) meetings, Grid Coordination Committee (GCC) meetings, and meetings at the Government level to ensure the optimal utilization of OPTCL's transmission system.

Rejoinder to Para 32:

OPTCL always executes its projects which are either approved in Business Plan of OPTCL or Intra State Transmission Plan. As per the license conditions, OPTCL is mandated to take prior approval of Hon'ble Commission for any transmission projects above Rs. 10 Cr. which OPTCL has been following scrupulously.

Rejoinder to Para 33:

Transmission loss in OPTCL is computed based on the Pool Cost data received from GRIDCO and the Energy Flow Statement issued by SLDC, both of which are prepared using data recorded by energy meters.

Rejoinder to Para 34:

Some of the innovative technologies adopted in OPTCL as under:

- OPTCL has successfully implemented digital substation technology at the 132/33 kV Agalpur–Rampur GSS, wherein fiber optic cables are used in place of conventional copper control cables to transmit current, voltage and control signals digitally. In this system, loss-causing copper elements are eliminated and replaced with fiber optics. Such incremental technological improvements collectively contribute to the reduction of transmission losses.

- Further, OPTCL is continuously replacing existing conductors in transmission lines, where thermal loading is approaching limits, with High Temperature Low Sag (HTLS) conductors, which have lower resistance compared to conventional ACSR conductors.

- On an experimental basis, OPTCL has installed a Fiber Optic Current Transformer (FOCT) at Chandaka GSS, thereby eliminating the need for conventional current transformers.

- Furthermore, OPTCL is augmenting age-old transformers with new, energy-efficient transformers, replacing old conductors with new ones,

Nabakishore Bariha

converting radial lines into ring mains, and upgrading single-circuit (S/C) lines to double-circuit (D/C) lines. All these measures collectively result in an overall reduction in transmission losses.

Rejoinder to Para 35:

The following outlines OPTCL's step-by-step Cyclone Mitigation Plan for Odisha's transmission & distribution network. It addresses Commission directives on adequate spares, Emergency Restoration System (ERS), mobile substations, and faster restoration following cyclones.

STEP-BY-STEP CYCLONE MITIGATION PLAN

Governance & Activation:

a) Overall command during a cyclone emergency rests with the Incident Commander, normally the CMD or Managing Director of OPTCL. Sr. General Manager of each zone control field operations, while the State Load Despatch Centre provides real-time grid coordination.

b) This command structure is activated the moment the India Meteorological Department (IMD) issues a cyclone watch or warning. A watch triggers a pre-impact alert; a warning of landfall within forty-eight hours or confirmed multi-tower failures escalates the plan to full mobilisation.

c) State Government bulletins and ground observations supplement the IMD alerts.

Pre-season Preparedness:

a) Every year between January and March, before the cyclone season begins, OPTCL updates a detailed coastal risk map covering a sixty-kilometre buffer from the shoreline. Priority circuits and substations are listed in the Power Atlas and circulated internally.

b) All two strategic depots—Mancheswar and Chatrapur—are audited to verify the availability of Emergency Restoration System (ERS) towers, spare transformers of various MVA ratings, extra-high-tension conductors, insulators, diesel-generator sets and de-watering pumps. Inventory is replenished to maintain at least a 5% maintenance buffer.

c) During this period, right-of-way corridors are cleared and trees trimmed, short-span interpositions are inspected, and a full functional check is performed on SCADA, OPGW, VSAT and satellite-phone links. Round-the-clock control rooms are tested to ensure operational readiness.

Pre-impact Measures:

a) Once the IMD issues a watch or warning, the Incident Commander issues a formal mobilisation order. This specifies the ERS kits, cranes, truck-mounted 33 kV mobile substations, spare transformers and diesel generators required for each corridor, along with designated staging points.

b) Crews, equipment and at least one ERS kit per priority corridor are moved to pre-cleared rally points, with police and forest permits already in place. Rate-contract gangs are activated.

c) Where necessary, the grid is reconfigured or islanded in advance to reduce cascade risk and to preserve supply to critical facilities such as hospitals, water-supply systems and telecom nodes.

During the Cyclone:

1. Safety is paramount. Field work is suspended whenever sustained wind speeds exceed safe operating limits, and all on-site activity resumes only with clearance from the Safety Officer.
2. Control rooms remain staffed around the clock. SCADA and VSAT systems continue to provide live status updates, and hourly situation reports are transmitted to the State Load Despatch Centre.

Immediate Restoration (First 72 Hours):

I. Within six to twelve hours of landfall—once conditions allow—assessment teams use drones and ground patrols to identify and geo-tag damage. ERS towers are deployed rapidly to bypass collapsed structures and to re-establish ring feeds, giving priority to feeders that supply hospitals, water works and essential communications.

II. If ERS deployment alone cannot restore local grids, truck-mounted 33 kV mobile substations are sent to key district hubs within the sixty-kilometre coastal belt. Diesel generators pre-installed at substations provide auxiliary power to support these operations and enable permanent repairs.

Medium-Term Recovery (Up to 14 Days):

10. Temporary ERS installations are replaced with permanent towers and foundations designed for Wind Zone VI conditions. Conductors are re-strung and insulators—preferably long-rod or silicone composite for saline

environments—are repaired or replaced. Transformer and other high-tension equipment are inspected and restored.

11. Depots are immediately replenished and purchase orders raised to replace used ERS components, conductors and insulators. All regulatory incident reports and applications for State and National Disaster Response Funds are filed as required.

Long-Term Mitigation:

15. Beyond immediate restoration, OPTCL continues to strengthen the network. The DRPS Phase II programme accelerates underground cabling of the most vulnerable urban and coastal corridors and upgrades overhead lines with shorter spans and higher wind-rated towers.
16. A permanent fleet of 33 kV truck-mounted mobile substations will be procured and stationed at DRC hubs so that each coastal division has dedicated rapid-response capacity. An ERS Division—headquartered in Bhubaneswar is being institutionalized to maintain equipment, conduct training and manage mutual-aid agreements with neighbouring utilities and POWERGRID for cranes and heavy hardware.

Capacity Building and Oversight:

13. All ERS crews undergo annual table top and field drills, including full tower erection and mobile-substation commissioning. Weekly patrols, thermo-vision inspections and safety audits are mandated for coastal towers, and results are logged centrally.
14. Recently a five-day mock exercise on the erection of 400 kV ERS towers and stringing of ACSR Twin Moose Conductor was conducted near Bhubaneswar Baliyatra Ground. The program was designed as a refresher and capacity-building initiative, enabling OPTCL engineers to gain hands-on exposure to ERS tower components, erection procedures, and stringing operations. This exercise not only helped in familiarization and skill enhancement but also strengthened the preparedness of field engineers to effectively respond during exigencies and restoration scenarios.
15. During any event, daily restoration reports are sent to the Odisha Electricity Regulatory Commission and the State Disaster Management Authority, followed by a formal after-action review within seven days.

Regarding design of Multi circuit tower

OPTCL has already standardized the design of multi-circuit towers. At present, such towers are being used in the 220 kV Pandiabil–Samangara transmission line. Further, in many upcoming projects, wherever required, multi-circuit towers are planned to be adopted.

2. The objections not specifically admitted may be deemed to have been denied.

PRAYER

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of M/s. Tata Steel Limited, Athagarh while approving ARR and Transmission Tariff of OPTCL for FY 2026-27 & Truing up application for the FY 2024-25.

By the Applicant
Through

M/s Odisha Bank

Sr. GM (El.), RT&C

Bhubaneswar
January 27, 2026



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Annexure-01

ODISHA ELECTRICITY REGULATORY COMMISSION
BIDYUT NIYAMAK BHAWAN
PLOT NO.4, CHUNOKOLI, SHAILASHREE VIHAR,
BHUBANESWAR - 751021
TEL. No. 2721048, 2721049, FAX: 2721053/2721057
E-mail: orierc@gmail.com
Website: www.orierc.org

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No. DIR (T)-332/2008/ 177
Dt. 01.02.2021

To

The Managing Director,
OPTCL,
Janpath, Bhubaneswar-22.

Sub: Billing procedure consequent upon implementation of new Open Access Regulations, 2020.

Ref: Your letter No. RT&C-47/2020/18(3) dt.08.01.2021.

Sir,

In inviting a reference to the subject mentioned above, it is to intimate you that transmission tariff of OPTCL is governed under OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 which is still in force.

Regulation 6.5 of Transmission Tariff Regulation, 2014 states as follows:

*"**Transmission Tariff:** The Transmission Tariff payable by the Beneficiaries of the Transmission System shall be designed to recover the Aggregate Revenue Requirement approved by the Commission for each year of the Control Period."*

Regulation 2.1(h) of the same Regulation states that a distribution licensee shall necessarily be a long term transmission customer for which it shall be required to enter into a transmission service agreement with the transmission licensee.

Aggregate Revenue Requirement of the transmission licensee is recovered from the beneficiaries DISCOMs who are long term open access customers. The Commission carryout true up exercise under the same Regulation basing on the actual expenses booked in the audited books of the account of the transmission licensee for the year and expenses allowed in the ARR for the corresponding financial year. Therefore, the approved ARR of the transmission licensee is well taken care of for any short fall on this account. The STU has entered into transmission service agreement with the DISCOMs accordingly.

O/C

The Open Access Regulation, 2020 stipulates that the open access customer who wishes to avail open access under that Regulation shall have to apply for the same. DISCOMs do not come under the same and are governed under Transmission Tariff Regulation, 2014 and consequential special transmission service agreement. The long term customer other than the DISCOMs shall come under OERC Open Access Regulation, 2020.

Therefore, you are required to follow OERC Transmission Tariff Regulation, 2014 scrupulously as long as it is in force.

Yours faithfully,

SECRETARY 1.2.2021

Annexure-02

सत्यमेव जयते

अखिल भारतीय विद्युत सांख्यिकी

All India Electricity Statistics

सामान्य पुनर्विलोकन 2025

(2023-24 के आंकड़े समाविष्ट)

General Review 2025

(Containing Data for the Year 2023-24)

भारत सरकार
विद्युत मंत्रालय
केंद्रीय विद्युत प्राधिकरण
नई दिल्ली
नवंबर 2025

Government of India

Ministry of Power

Central Electricity Authority

New Delhi

November 2025

(अधिनियम 2003 की धारा 73 (आई) एवं (जे) के तहत के. वि. प्रा. के दायित्व के पालन हेतु प्रकाशित)

(Published in fulfilment of CEA's obligation under Section 73(i) & (j) of the Electricity Act 2003)

Table 6.2
Regional Transmission Losses
Utilities
2023-24

Region	Energy Available in the Region (GWh)	Export to other Region (GWh)	Export to Nepal (GWh)	Export to Bangladesh (GWh)	Export to Bhutan (GWh)	Export to Myanmar (GWh)	Total Energy drawal by States/Utilities (GWh)	Transmission Losses (GWh)	Transmission Losses (%)
1	2	3	4	5	6	7	8	9 (2-3-4-5-6-7)	10((8/2)x100)
Northern Region	234996.97	3117.23	170.57	0.00	0.00	0.00	224302.97	7406.20	3.15
Western Region	332120.58	99896.14	0.00	144.00	0.00	0.00	221708.25	10372.19	3.12
Southern Region	212787.85	4758.03	0.00	0.00	0.00	0.00	200663.51	7366.31	3.46
Eastern Region	142021.92	55318.56	1254.36	7315.07	1330.61	0.00	70787.65	6015.68	4.24
North Eastern Region	19710.81	3117.64	0.00	1072.11	0.00	8.47	14746.36	766.23	3.89

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur
Bhubaneswar-751021

Case No: 121/2025
Filing No: 1

IN THE MATTER OF:

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022.

... **Applicant**

AND

IN THE MATTER OF:

M/s. Jindal Steel Limited, Chhendipada Road, SH 63, PO: Jindal Nagar, Angul, Odisha: 759111

...Respondent

The humble respondent above named most respectfully submit as under:

1. That, M/s. Jindal Steel Limited (Respondent), being a Company incorporated under Companies Act 1956 and having its Registered Office at O.P. Jindal Nagar, Hisar, 125005, Haryana, having plant site at Chhendipada Road, SH-63, Jindal Nagar, PIN-759111, Dist-Angul, Odisha is consumer of TPCODL and connected with OPTCL Grid Substation at Meramunduli through a 400 kV Double Circuit Line.

2. Jindal Steel Limited is submitting the following points on the application of OPTCL for determination of Annual Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 for kind review and necessary action by the Hon'ble Commission.

3. Human Resources Expenses:

That OPTCL has projected Employee Cost expenditure at Rs. 531.52 Crore for FY 2026-27 against Rs. 488.63 Crore as approved by the Commission to be spent during FY 2025-26. The summary of Employee Expenses of OPTCL for the last sixteen financial years is furnished below.

Summary of Employee Expenses

Financial Year	Proposed	Approved	Actual
2010-11	865.13	279.56	173.11
2011-12	952.06	338.14	279.56
2012-13	655.36	318.48	268.59
2013-14	341.2	289.3	191.70
2014-15	361.38	318.18	309.59
2015-16	310.02	305.23	285.95
2016-17	399.56	292.55	382.44
2017-18	462.33	304.5	380.32
2018-19	419.57	360.4	375.65
2019-20	421.99	419.77	394
2020-21	466.22	415.87	373.19
2021-22	532.73	457.88	474.83
2022-23	526.53	477.19	
2023-24	508.76	449.08	
2024-25	582.06	488.63	
2025-26	554.05	488.63	
2026-27	531.52		

OPTCL may provide a detailed employee list cadre wise approved sanctioned strength by Govt. of Odisha vis-a-vis actual post filled up and post laying vacant.

The cost break-up of the employee expense is provided below:



Sl. No	Particulars	Prev. Year 2024-25	Curr. Year 2025-26	Ensuring Year 2026-27
A	**Salary & Allowance**	1	2	3
1	Basic Pay	151.82	158.83	159.57
2	Dearness Allowance	79.79	96.89	102.12
3	House Rent Allowance	25.25	23.89	25.77
4	Medical Allowances	7.66	8.34	8.38
5	Conveyance Expenses (Allowance + Reimbursement)	4.13	4.08	6.28
6	Other Allowance	1.63	1.70	1.81
7	Bonus	0.18	0.20	0.20
8	Stipend for New Recruitment	8.09	4.05	5.70
9	Stipend to Apprentice	1.45	2.00	2.08
10	Arrear Salary for Wage Board Revision			
	Sub-total (A)	280.00	299.59	311.91
B	**Additional Employee Cost**			
1	Out Sources Engagement	3.78	4.34	7.01
	Sub-total (B)	3.78	4.34	7.01
C	**Other Employee Cost**			
1	Leave Travel Concession	0.15	0.59	0.59
2	Honorarium	0.10	0.12	0.19
3	Ex-gratia	6.44	6.50	7.92
4	Staff Welfare Expenses	4.48	7.94	12.02
5	Other Employee Cost	-	0.03	0.04
6	Capacity Building Charges	1.30	2.00	2.40
	Sub-total (C)	12.48	17.19	23.16
D	**Terminal Benefits**			
1	Pension	135.94	140.02	144.22
2	Gratuity	13.22	13.62	14.03
3	Leave Salary	19.91	20.51	21.12
4	Other (including contribution to NPS)	24.46	24.99	26.47
	Sub-total (D)			
E	**Total Employees Cost (A+B+C+D)**	489.78	520.26	547.93
F	Less: Employees Cost Capitalised	16.40	16.40	16.40
G	**Net Employee Cost (E- F)**	473.38	503.85	531.52

1. **Basic Pay and Grade Pay:** Basic Pay and Grade Pay proposed for FY 2026-27 = Rs. **159.57** Cr. is based on actual cash flow for FY 2025-26 with additional increment of 3% and average number of employees. OPTCL is planning to recruit 250 Nos. employees during FY 2025-26 and 50 Nos. in FY 2026-27.
2. **DA:** OPTCL proposed 64% DA for FY 2026-27, considering Finance Dept. guidelines. However, actual increases in DA may be reviewed.
3. **HRA:** OPTCL proposed HRA @19%. Actual cash flow may be considered.
4. **Outsourcing:** OPTCL is functioning with 50% of manpower and has outsourced services. Accordingly, Rs. 7.01 Cr. has been proposed towards payment to outsourced personnel. The same can be reviewed.
5. OPTCL is planning to recruit 250 Nos. employees during FY 2025-26 and 50 Nos. in FY 2026-27 and has proposed Rs.05.70 Cr. towards stipend for the new recruiters. Considering the past trend of recruitment, the same may be reviewed.
6. Actual addition of employees is lesser than the approved. Stipend and employee cost should be approved by reviewing proposed addition of employees.
7. Terminal benefits should be reviewed on an actual cash flow basis.

Hence the Employee cost Expenses of OPTCL for FY 2026-27 may be approved accordingly by the Hon'ble Commission.

4. Repair and Maintenance (R&M) expenses

That OPTCL has projected Repair and Maintenance Expenses at Rs. 259.65 Cr for FY 2026-27 against Rs. 160 Crs as approved by the Commission to be spent during FY 2025-26.

The summary of Repair and Maintenance (R&M) expenses of OPTCL for the last sixteen financial years is furnished below.

Summary of R & M Cost

Financial Year	Proposed	Approved
2010-11	98.14	60
2011-12	93.89	75
2012-13	95.46	95
2013-14	108.91	60
2014-15	146.77	93
2015-16	154.11	108
2016-17	170.66	110.59
2017-18	155.11	124.97
2018-19	156.19	111
2019-20	115.22	115.22
2020-21	140.59	115.22

2021-22	151.1	118.61
2022-23	148.04	110.5
2023-24	164.34	135
2024-25	169.3	135
2025-26	217.7	160
2026-27	259.65	

It is respectfully submitted that R&M cost of OPTCL for FY 2026-27 may be approved accordingly by the Hon'ble Commission.

5. Administration & General Cost

That OPTCL has projected Administrative and General (A&G) expenditure at Rs. **46.95 Crs** for FY 2026-27 against Rs. **42.46 Crs** as approved by the Commission to be spent during FY 2025-26.

The summary of Administrative and General Expenses of OPTCL for the last sixteen financial years is furnished below.

Summary of A&G Cost

Financial Year	Proposed	Approved
2010-11	26.99	15.14
2011-12	38.34	18
2012-13	39.11	21.25
2013-14	23.09	22.39
2014-15	25.46	24.01
2015-16	32.36	24.37
2016-17	25.58	24.66
2017-18	26.11	25.6
2018-19	27.23	26.44
2019-20	28.07	27.55
2020-21	28.66	28.72
2021-22	38.13	30.35
2022-23	43.18	37.73
2023-24	47.07	40.28
2024-25	51.13	37.05
2025-26	49.8	42.46
2026-27	46.95	

The Hon'ble Commission may review the Inspection fee expenses and training expenses. Details of the training calendar and its benefits may be checked.

6. Depreciation Cost

That OPTCL has projected depreciation expenditure at Rs. 337.09 Crs for FY 2026-27 against Rs. 284.33 Crs as approved by the Commission to be spent during FY 2025-26.

The summary of Depreciation of OPTCL for the last sixteen financial years is furnished below.

Summary of Depreciation Cost

Financial Year	Proposed	Approved
2010-11	153.31	76.6
2011-12	156.4	79.42
2012-13	155.99	78.57
2013-14	172.85	89.4
2014-15	176.02	92.71
2015-16	197.72	107.48
2016-17	150.5	101.45
2017-18	192.59	130.76
2018-19	217.9	145.43
2019-20	186.03	162.06
2020-21	208.59	195.59
2021-22	276.5	232.95
2022-23	263	233.57
2023-24	293.96	269.54
2024-25	320.03	275.67
2025-26	356.57	284.33
2026-27	337.09	

- Norms of tariff regulations and rates as specified in the Transmission Tariff regulations should be considered.
- The depreciation should be determined after due scrutiny.

7. Annual Revenue Requirement:

That the OPTCL has given the proposal for an annual revenue requirement of Rs. 1765.40 Crore for FY 2026-27 against Rs. 1331.02 Crore as approved by the Commission to be spent during FY 2025-26.

The summary of ARR of OPTCL for the last fifteen financial years is furnished below.

Financial Year	Proposed	Approved
2011-12	1435.88	579.34
2012-13	1348.46	612.53
2013-14	874.74	597.87
2014-15	988.8	641.3
2015-16	1008.36	630.94
2016-17	975	623.25
2017-18	1013.63	639.4
2018-19	990.65	659.95
2019-20	861.27	706.71
2020-21	966.44	713.84
2021-22	1307.17	792.93
2022-23	1247.14	831.95
2023-24	1102	896.18
2024-25	1380.69	913.7
2025-26	1663.33	1331.02
2026-27	1765.40	

Hence the Annual Revenue Requirement of OPTCL for FY 2026-27 may be approved accordingly through a prudence check and based on the submission made above by the Respondent.

8. Determination of Transmission Charges

OPTCL has given the proposal for transmission charges @ **35.61 P/U** for FY 2026-27 against 25.5 P/Unit as approved by the Commission during FY 2025-26. The proposed Transmission Tariff of **35.61 P/U** is very high and should not be permitted. This will adversely affect the RST of the DISCOMS and will be a huge burden on the consumers of Odisha.

9. The proposal by OPTCL to disallow the rebate on prompt payment for Open Access customers, particularly Long & Medium-Term Open Access customers, needs to be carefully reviewed in the context of its impact on customer relations, operational efficiency, and regulatory guidelines.

While OPTCL has cited that there is no provision for rebate for early payment in the Open Access Regulations of 2020, the previous practice of offering a 2% rebate for payments made within two days was beneficial in encouraging timely payments and improving the cash flow for OPTCL. Discontinuing this rebate may have adverse effects on the payment behaviour of Open Access customers, leading to potential delays in payment and reduced financial liquidity for OPTCL.

It is also essential to consider the implications of such a move on the competitiveness and attractiveness of Odisha's transmission system to potential Open Access customers. Providing financial incentives, such as the prompt payment rebate, could serve as a mechanism to retain customers and ensure a smoother cash flow for OPTCL. Additionally, a shift in policy might need to be discussed and approved by the Commission to ensure it aligns with the broader regulatory framework and customer service goals. In light of these factors, it is proposed that OPTCL may reconsider the discontinuation of the rebate, or alternatively, propose a revised rebate structure that balances the financial interests of both OPTCL and its Open Access customers. The Commission's input and further deliberation on the matter may be necessary to ensure that the policy is fair, transparent, and in the best interest of all stakeholders.

10. The Open Access Regulations, 2020 treat the DISCOMs and other Open Access users like CGP, and Industrial Consumers on the same footing. However, exceptions is being carved out, wherein the DISCOMs need not submit their contracted quantity and are allowed to pay Transmission Charges on the actual energy transacted, whereas the other OA customers like CGPs, Industries are being forced to pay the Transmission Charges on the Contracted Quantity. Further, OPTCL has proposed to do away with the prompt payment rebate for OA customers like CGPs and Industries while allowing the prompt payment rebate benefit to DISCOMs. This type of differential treatment is against the Open Access Regulation, Grid Code, and statutory provision under the Electricity Act 2003. Therefore, it is requested that the Commission to treat all the Transmission Users i.e. CGPs, Industries, and DISCOM on the same footing with provision for charges, and rebates on the same principle without any discrimination.

11. Transmission Loss:

OPTCL has proposed transmission loss at 3.05%. In conformity with the power sector reform, OPTCL needs to reduce the transmission loss significantly. We propose to approve transmission loss of OPTCL at 2.5%.

That OPTCL has not yet identified the areas where loss is maximum and OPTCL needs to formulate action plans for loss reduction. OPTCL should inform the methodology adopted to estimate the transmission loss for every year. OPTCL should have undertaken energy audits of lines and substations to know the quantum of transmission loss in the system. Proposing the transmission loss arbitrarily without giving the breakup of the losses in different components of transmission system i.e., lines, substations, power transformers and auto transformers etc are not appropriate for the S.T.U. Thus proposing loss as per the business plan is meaningless. There is enough measure by which OPTCL could reduce the Transmission loss. OPTCL should conduct energy audits and their standard performance should be monitored by a third party auditor appointed by the Commission so as to assess the actual performance of the licensees.

It is prayed before the Hon'ble Commission may kindly re-calculate and approve transmission loss accordingly.

12. That earlier CGPs used to inject inadvertent power to the grid and GRIDCO availed the benefits of inadvertent power. GRIDCO also used to pay the hydro pool cost towards the inadvertent power. However, from FY 2019-20 onwards GRIDCO has stopped making payment towards inadvertent injections. Hence, OPTCL became the ultimate beneficiary of such injection of inadvertent power. We pray to the Hon'ble Commission to direct OPTCL to submit the detailed list of inadvertent injection for each month by each CGP and consider the same as an additional injection to the grid accordingly to calculate the transmission loss. The data of inadvertent injection is available with OPTCL and SLDC for each month for each CGP who are connected to EHT transmission system of OPTCL. The entire stakeholder and consumers of Odisha will be benefitted by such methodology as the intra-state transmission loss will reduce significantly.

13. Given the significance of maintaining transparency and accuracy in the transmission system's performance, it is requested that OPTCL conduct a Third-Party Energy Audit of its transmission loss. The energy audit should be carried out by an accredited energy auditor in line with the guidelines specified by the regulatory authorities.

The requirement to conduct an annual energy audit is crucial not only for assessing transmission losses but also for identifying potential inefficiencies and implementing corrective actions that can help in optimizing the system's overall performance. This audit will provide an independent, unbiased evaluation of the transmission system's energy losses and help in formulating strategies for loss reduction, which will ultimately contribute to improving the operational efficiency and financial health of OPTCL.



14. Open Access Charges:

Each year Hon'ble OERC informed OPTCL to submit 400 kV, 220 kV, 132 kV Power Transformer and EHT lines loading. OPTCL should make a practice to submit the Power flow data for 400 kV, 220 kV line and 132 kV line and its loading and the entire Auto-transformer loading, Power Transformer and ICT loading along with the ARR application. Moreover, by submitting only power transmitted on the peak demand day will not solve the purpose. In order to ascertain the margin availability, OPTCL may be directed to submit the maximum power handling capability, power flow and % loading of all the 400 kV, 220 kV, 132 kV line and Power Transformer, Auto Transformer, ICT Transformers. It is also desired that OPTCL should conduct load flow analysis to handle around 2000-3000 MW differential load in appropriate manner.

Once these data are made available, it can be ascertained that, there are sufficient margin is available in the transmission network and in order to utilize it fully, STOA should be promoted and the charges for the same may be kept at 1/4 of the MTOA and LTOA charges and necessary amendments in the regulations may be made.

15. Introduction of Reactive Energy Charges:

OPTCL has proposed to introduce Reactive Energy Charges of 3 Paise / kVARh which is very high and should be rejected.

16. Levy of Grid Support Charge for connectivity:

OPTCL has submitted an application to the Hon'ble OERC on 26.06.2024, to determine and approve the imposition of Grid Support Charges for industries with Captive Generating/Cogeneration plants that operate alongside the OPTCL grids.

The case was registered as OERC Case No.-44/2024. In an order dated July 6, 2023, the High Court suggested that if OPTCL wishes to pursue the imposition of Grid Support Charges, they should file a separate application with the OERC. The court emphasized that the OERC, under Section 181 of the Electricity Act, should examine the justifiability of such charges. Hon'ble Commission in order dated 09.07.2024 in case no 44 of 2024 has directed OPTCL to submit a consolidated report considering certain queries. OPTCL has submitted the report on 29.01.2025.

17. It is prayed before the Hon'ble Commission that the levy of Grid Support Charges (GSC) on Captive Generating Plants (CGPs) be abandoned. CGPs are operated by industries that already have a contract demand with the respective DISCOMs, which means they are contributing to the grid through their contracted capacities. The imposition of GSC on CGPs would lead to a scenario where industries are effectively being charged twice for grid

support – once through their contract demand with DISCOMs and again via the proposed GSC.

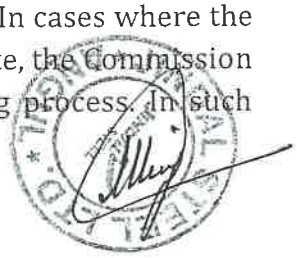
This double charging would result in an unfair financial burden on industries that are already supporting the grid by paying for their contractual obligations. Such a practice could discourage further industrial investments in renewable energy projects, which is counterproductive to the state's objectives of promoting sustainability and industrial growth. Therefore, in the interest of fairness and to avoid unnecessary financial strain on industries, OPTCL should abandon the proposal to levy GSC on CGPs. This would ensure that industries are not unfairly penalized for their contribution to the grid, while also promoting the continued growth of renewable energy in Odisha.

18. It is proposed that OPTCL should proactively prepare and maintain a monthly status report outlining the available transmission lines, substation details, bay availability, and transformer capacity. This would enable prospective developers to assess the existing infrastructure and apply for an NOC for grid connectivity before submitting their applications to the RE nodal agency. By making this information accessible, OPTCL can streamline the process for developers, allowing them to submit their grid connectivity applications with more certainty.

Under the current practice, OPTCL does not conduct a prepaid system study unless the project has received approval from a nodal agency. However, it is recommended that OPTCL issue the NOC for grid connectivity based on the available infrastructure information, without requiring a prepaid system study at this early stage. The detailed prepaid system study can be conducted later, once the project has been approved by the relevant nodal agency. This approach would help accelerate the approval process and ensure timely facilitation of renewable energy projects in Odisha, while ensuring that the system remains aligned with the capacity of existing transmission infrastructure.

19. OPTCL may be directed to submit the current status of the 765 kV transmission network plan, specifically for the two 765 kV ISTS lines: Angul to Gopalpur and Angul to Paradeep, as well as the status of the 765 kV substation in the Kolabira area. In addition, OPTCL should provide detailed updates on the progress of transmission projects such as the Paradeep-Mahakalapada 765 kV line, the 400 kV substations at Joda, Ersama (Paradeep), and Neulapoi.

Furthermore, OPTCL should inform the Commission about the likely transmission and capacity charges for these projects, ensuring that they are transparent and justifiable. These charges should be subject to a prudence check by the Hon'ble OERC to assess whether they adequately serve the interests of consumers and the state. In cases where the charges do not align with the best interests of the consumers and the state, the Commission may not approve the proposed capital expenditure plan and tendering process. In such



instances, OPTCL should be instructed to initiate a fresh tendering process under the Intra-State Transmission Plan to ensure that the most optimal and cost-effective solutions are selected.

20. Transmission business being a capital intensive projects requires long term planning. Therefore, Hon'ble OERC may direct OPTCL to submit MYT tariff and long term Business Plan based on which Investment Plan should be provided.

21. That Intrastate transmission system should be developed in a coordinated manner in consultation with CTU, State govt., Generating companies, Regional Power Committees, CEA & licensees. However such grid coordination meetings are not happening regularly. It is proposed that the grid coordination committee meeting may be conducted regularly. Nos of industries are facing lots of difficulties in getting grid connectivity and enhancement of contract demand. Even the Hon'ble OERC has directed to hold a meeting of OPTCL with DISCOM on a monthly basis to ensure smooth operation of the power sector and MOM to be furnished to OERC. The Hon'ble OERC in its earlier transmission tariff order dated 13.02. 2024 in case no. 113/2023 has directed to submit the revised 14th inter-state transmission plan of OPTCL for approval. OPTCL may kindly submit the status of the 14th inter-state transmission plan of OPTCL and stage wise implementation plan.

22. The Hon'ble OERC has published the OERC (Development of Intra-State Transmission Projects through Tariff Based Competitive Bidding in the State of Odisha) Order, 2022. OPTCL may be directed to submit an action taken report towards execution of new transmission projects. The Hon'ble OERC has earlier directed OPTCL to standardized the transmission line tower, multi-circuit tower etc. the Hon'ble OERC may pass appropriate order.

23. Further, it is proposed that OPTCL should set up an independent testing lab accredited by NABL for testing relays, meters, transformer oils so that such facilities can be availed by industries.

24. It is noted that OPTCL has claimed ₹0.35 Cr towards annual Grid Coordination Committee (GCC) expenses. However, the respondent seeks clarification from OPTCL regarding the number of GCC meetings conducted during FY 2023-24, FY 2024-25 and FY 2025-26. Additionally, OPTCL should provide details of the outcomes from each GCC meeting or make this information publicly available on its website for transparency and accountability.

The respondent further understands that, as per the provisions of Chapter 11, Clause 2 (2) of the Odisha Grid Code Regulation, 2015, there appears to be a lack of GCC meetings being held in the prescribed manner. It is crucial that the objectives of the GCC, which are to ensure efficient coordination between transmission, distribution, and generation entities, are met as per regulatory requirements. Therefore, OPTCL should clarify the status of GCC

meetings, as well as any actions taken to address this issue, ensuring compliance with the Grid Code and the effective functioning of the transmission and distribution system in Odisha.

25. It is proposed that OPTCL should conduct a feasibility study to assess the potential of converting the existing 26 numbers of 132 kV switching stations into 132/33 kV substations. This conversion would involve establishing additional bays and installing 132/33 kV transformers, thereby enhancing the capacity to accommodate the future load requirements of DISCOMs. The proposed upgrade would not only cater to the increasing demand from existing consumers but also provide a critical infrastructure platform for connecting future renewable energy (RE) projects, particularly solar power plants, into the grid. This conversion aligns with the growing need for decentralized and renewable energy sources, which are integral to meeting the State's sustainability and decarbonisation goals. By expanding the grid infrastructure, OPTCL can ensure that the transmission network is future-proofed to handle an influx of renewable energy, which is expected to play a key role in Odisha's energy transition. Moreover, this initiative will reduce the load on existing substations and improve the overall grid stability, enabling efficient power distribution across the state. Therefore, a comprehensive feasibility study by OPTCL will allow for a detailed assessment of technical, economic, and environmental implications, thereby ensuring that the infrastructure investments are both optimal and sustainable in the long term.

26. OPTCL should make a standard practice to prepare its ARR application and insert these regular features during the ARR application stage considering all relevant query of Hon'ble OERC. This will be quite helpful for the Respondents as well as for the officials of Hon'ble OERC for conducting proper analysis and scrutiny.

27. The Commission should direct OPTCL to engage with the Government of Odisha to secure funding for economically unviable projects and other critical infrastructure developments that serve the larger interest of the State. Many transmission projects, though essential for grid reliability, regional development, and equitable power access, may not be financially viable solely through tariff-based funding. Government grants can bridge this gap, ensuring that crucial transmission infrastructure is developed without placing an excessive financial burden on consumers. Additionally, state-funded support for such projects would facilitate balanced regional growth, promote industrialization in remote areas, and enhance overall energy security. A coordinated approach between OPTCL and the Government will help in prioritizing strategic projects, optimizing resource allocation, and accelerating execution timelines. Therefore, securing grants for these projects is imperative to ensure a robust and resilient transmission network that supports Odisha's long-term energy and economic goals.

28. The Commission may direct OPTCL to continuously monitor the transmission system's operation and take proactive measures to prevent overloading or under loading

which is essential for ensuring an efficient and reliable power network. Overloading can lead to equipment failures, increased technical losses, and reduced system lifespan, while under loading results in inefficient asset utilization and financial strain. By adopting innovative strategies such as dynamic load management, network reconfiguration, real-time data analytics, and grid optimization techniques, OPTCL can achieve optimal loading of the existing infrastructure. This will not only help in reducing transmission losses but also enhance grid stability and improve overall system efficiency. Additionally, leveraging advanced technologies like AI-driven predictive maintenance, demand forecasting, and adaptive grid control will enable a more resilient and cost-effective transmission network. Therefore, continuous monitoring and proactive intervention are necessary to maximize the operational efficiency of the transmission system, ensuring sustainable and economical power transmission for all stakeholders.

29. The Commission's earlier directive for coordinated development of the intra-state transmission network, ISTS, and downstream distribution infrastructure is crucial to ensure optimal asset utilization, financial prudence, and grid stability. Many substations under OPTCL remain under loaded due to the absence of necessary downstream infrastructure from DISCOMs, leading to stranded assets and inefficient capital deployment. To avoid such inefficiencies, it is essential that OPTCL, DISCOMs, and CTU synchronize their planning and execution timelines. This will prevent unnecessary transmission investments that burden consumers with higher tariffs without delivering corresponding benefits. Moreover, ensuring that transmission system strengthening projects align with actual load growth will reduce the risk of power evacuation bottlenecks, voltage fluctuations, and increased transmission losses. A structured, joint planning approach will enhance grid reliability, improve network efficiency, and protect consumer interests. Therefore, the Commission's directive to mandate discussions among stakeholders before execution is a necessary step to ensure a well-integrated, cost-effective, and sustainable power transmission system.

30. Therefore, Transmission system upgrades should be strategically planned rather than implemented in an ad-hoc manner. The Commission should direct that no transmission system strengthening proposals should be executed without the prior approval of the Commission. Strengthening measures should be backed by technical and economic justifications, as required by OPTCL's license conditions and tariff regulations. Transmission projects involve significant capital investments that ultimately impact consumer tariffs. Prior Commission approval ensures that OPTCL implements only necessary and cost-efficient projects. Avoids excessive capital expenditure, which could lead to unjustified tariff hikes for consumers. Aligns investments with the approved capital expenditure (CAPEX) plans under the tariff regulations.

31. OPTCL should be directed to consider the meter data to assess the month-wise transmission loss in intra-state transmission systems including losses at different voltage levels (i.e. 132 kV, 220 kV and 400 kV levels).

32. The power utility has proactively implemented multiple loss reduction strategies, including system automation, load bifurcation, and digitization of the grid. Despite these extensive efforts, the anticipated loss reduction has not been realized, proving that systemic challenges persist beyond mere technical upgrades. Load bifurcation improves local reliability, but its impact on overall transmission loss is minimal, as power still needs to travel long distances from generation to consumption points. The introduction of ring systems instead of radial networks has increased network stability and redundancy, but transmission losses are still governed by physical distance and resistance of the conductors. Advanced transformers and low-loss conductors have been introduced, yet their impact on overall losses will be realized only after complete replacement of old equipment across the entire network. Bay control units (BCUs) and digital substations provide enhanced monitoring and real-time control over power flow, reducing inefficiencies. However, these tools primarily assist in identifying losses rather than eliminating them outright. Their full impact will be seen once corrective actions are consistently implemented over a longer duration.

33. It is proposed that Cyclone resilient robust electricity transmission and distribution infrastructure in coastal areas should be established by OPTCL. OPTCL may be directed to submit a report on how many mobile substations are available with them to meet the contingency situation during cyclone and their cyclone mitigation plan which has been earlier directed by Hon'ble OERC. OPTCL has not taken action for the design of multi-circuit and multi voltage transmission lines.

34. We request the Hon'ble Commission to kindly allow the Respondent to submit any additional submissions, memos, documents etc. as may be required and in general do all such things as may be required in connection with the above reply.



PRAYER

In the facts and circumstances stated above and in the interest of the parties and the larger interest of the State the Hon'ble Commission be pleased to pass appropriate orders to the effect that

1. ARR of OPTCL may be approved accordingly based on the submission made above.
2. The Transmission Charges should be reviewed and reduced substantially.
3. Transmission loss to be reduced considering the submission made for FY 2026-27.
4. Proposal of Reactive energy charges of 3 paise/KVARh should be rejected.
5. Proposal of OPTCL to levy of Grid Support Charge for connectivity may be rejected.
6. Each year truing up exercise and business plan approval should be carried out by Hon'ble commission through a process of public hearing.

Place: Bhubaneswar

Date: 10.01.2026

For M/s Jindal Steel Limited

Authorized Signatory

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur
Bhubaneswar-751021

Case No: 121/2025
Filing No: 1

IN THE MATTER OF:

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022

... Applicant

AND

M/s. Jindal Steel Limited, Chhendipada Road, SH 63, PO: Nisa, Angul, Odisha: 759130

....Respondent

Affidavit No. 737 /2026
Dated 15th Jan /2026

AFFIDAVIT IN SUPPORT

I, Shri M.A.Aiyappa, son of Late Shri M.A.AIYANNA, aged about 56 years, working as Associate Vice President – Central (Electrical) in Jindal Steel Limited, Chhendipada Road, SH 63, PO: Jindal Nagar, Angul, Odisha: 759111 do solemnly affirm and state as follows : -

1. That I am the Associate Vice President – Central (Electrical) in in Jindal Steel Limited and I am duly authorized to swear this affidavit on its behalf.
2. The statements made in the petition are based on information and I believe them to be true.

PLACE: Bhubaneswar
DATE: 10.01.2026

DEPONENT

NOTARY R.K. BEHERA Regd. No.- ON 09-2002 ANGUL

NOTARY ANGUL ONE RUPEE

15.1.26
ROHITA KUMAR BEHERA
NOTARY
ANGUL, ODISHA
Regd. No-ON 09-2002
Cell-9439737146

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur
Bhubaneswar-751021

Case No: 121/2025
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IN THE MATTER OF:

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022

... **Applicant**

AND

M/s. Jindal Steel Limited, Chhendipada Road, SH 63, PO: Nisa, Angul, Odisha: 759130

....**Respondent**

Letter of Authorization

I, Shri M.A.AIYAPPA working as Associate Vice President – Central (Electrical) in Jindal Steel Limited, Chhendipada Road, SH 63, PO: Jindal Nagar, Angul, Odisha: 759111 hereby authorize Sri Bibhu Swain, residing at K-8-82, Kalinga Nagar, Ghatikia, Bhubaneswar-751029 to be my representative to present the above case on my behalf before the Hon'ble Odisha Electricity Regulatory Commission relating to my above reply and to submit any additional submission, memos, documents etc. as may be required and in general do all such thing as may be required in connection with the above reply.

For M/s. Jindal Steel Limited

Place: Bhubaneswar

Date: 10.01.2026

Authorized Signatory

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
PLOT NO. 4, SAILESHREE VIHAR,
CHANDRASEKHARPUR, BHUBANESWAR-751021

CASE NO. 121/2025
FILING NO. 3

IN THE MATTER OF: (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2025-26 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

And

(ii) Truing up application for the FY 2023-24 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

AND
IN THE MATTER OF: Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

..... Applicant

vrs

M/s. Jindal Steel Limited, Chhendipada Road, SH 63, PO: Jindal Nagar, Angul, Odisha: 759111 and **16 others.**

..... Objectors

Rejoinder to the objections raised by the Objector M/s. Jindal Steel Limited.

The humble applicant above named

MOST RESPECTFULLY SHEWETH:

1. That the Objector M/s. Jindal Steel & Power Limited vide affidavit dated 16.01.2026 has raised certain submissions on ARR & Transmission Tariff Application of OPTCL for FY

2026-27 and Truing up application for FY 2024-25. In reply, OPTCL submits its rejoinder to the submissions in the following paragraphs.

Rejoinder to Para 3 to 7:

The respondent has submitted statistical data of the previous years comparing the proposed vis-à-vis approved in respect of expenses towards human resource expenses, R&M expenses, A&G expenses, depreciation and RoE with a request to approve accordingly after due scrutiny. In this regard, it is pertinent to mention that OPTCL has submitted its ARR application for FY 2026-27 as per the various provisions stipulated in OERC (Terms & Conditions for Determination of Transmission Tariff) Regulations, 2014 and directions of the Commission passed in different orders with proper justifications.

Further, details of Sanctioned strength vis-a-vis actual man in position is furnished below:

Manpower position as on 20.01.2026			
Category	**Sanctioned Strength**	**MIP**	**%**
Executive	2040	1400	68.63%
Non-Executive	3862	1342	34.75%
Total	**5902**	**2742**	**46.46%**

Rejoinder to Para 8:

Determination of Transmission Charges:

The Transmission infrastructures are created considering the demand and request of the DISCOMs / Industries from time to time, after due approval form the Hon'ble OERC through Transmission Plan. Being a Deemed Transmission License, OPTCL has always endeavored to create the Transmission infrastructure for providing reliable and quality power to the consumers of DISCOMs. Accordingly, every year OPTCL is adding more transmission assets to meet the requirement of DISCOMs. Transmission Charge is arrived at 35.61 paise per unit by dividing the total ARR of OPTCL with the recent realistic MU projections of DISCOMs and recovered from them on a monthly basis. This rate will decrease if DISCOMs drawal increases. In fact, OPTCL has consistently advocated for the recovery of transmission charges based on contracted capacity, in line with the practice followed by STUs in other states.

The proposed Transmission Charge of 35.61 p/u has been derived by considering the recent realistic energy demand projections of 41,849.28 MU as

Nasa Kishor Babu

communicated by the DISCOMs & other LTOA customers and the ARR figures have been arrived by OPTCL justifying component wise projections as per the provisions contained in OERC Transmission Tariff Regulations, 2014, OPTCL's Audited Accounts for FY 2024-25, all relevant data/information and materials. The details of projections are submitted in page 30 of the present ARR application of OPTCL for FY 2026-27. Moreover, OPTCL had furnished all requisite information and details as per the prescribed formats of the Hon'ble Commission with full justifications.

Hence, mere apprehension of the respondent towards imposition of excessive burden on Discoms seems to be inappropriate and unacceptable which is likely to be rejected at this juncture. Moreover, the contention of the stake holder operating in the value chain of electricity needs to appreciate the fact that the cost recovery has to be in full so as to make the sector sustainable.

Rejoinder to Para 9 & 10:

The Hon'ble Commission vide letter no. DIR (T)-332/2008/77 dated 01.02.2021 has clarified that the DISCOMs do not come under the new regulation "OERC (Terms and conditions of Intra state open access) Regulations 2020" and they are governed under OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014. A copy of the said letter is provided as **Annexure-01.** Further, the details of provision of Rebate have been meticulously mentioned in page no: 59 of our ARR application for FY 2026-27 as per the said OERC Regulations.

Rejoinder to Para 11-13:

Transmission Loss

The argument for transmission loss of OPTCL at 2.5% is without any justification. The actual transmission loss for the period **Apr' - Sep' 2025** is calculated to be **3.07%** as shown in the ARR & TT application for FY 2026-27 (page-205). This figure is **less than the actual** transmission loss during last year **i.e. 3.09%** for **FY 2024-25.** In fact, OPTCL had projected a Transmission loss of 3.05% for FY 2025-26, but Hon'ble Commission had set a target of 3.00% which could not be achieved yet.

In OPTCL system, the transmission loss is purely technical loss and a function of real time injection of power by a number of generators, system configuration and power flow requirements at different load centers. It depends on many parameters / factors such as distance and mismatch between generation and load centers, types of load, reactive power compensation, voltage profile, seasonal variation of demand load etc. Thus, OPTCL does not have much control over the same at any point of time. The

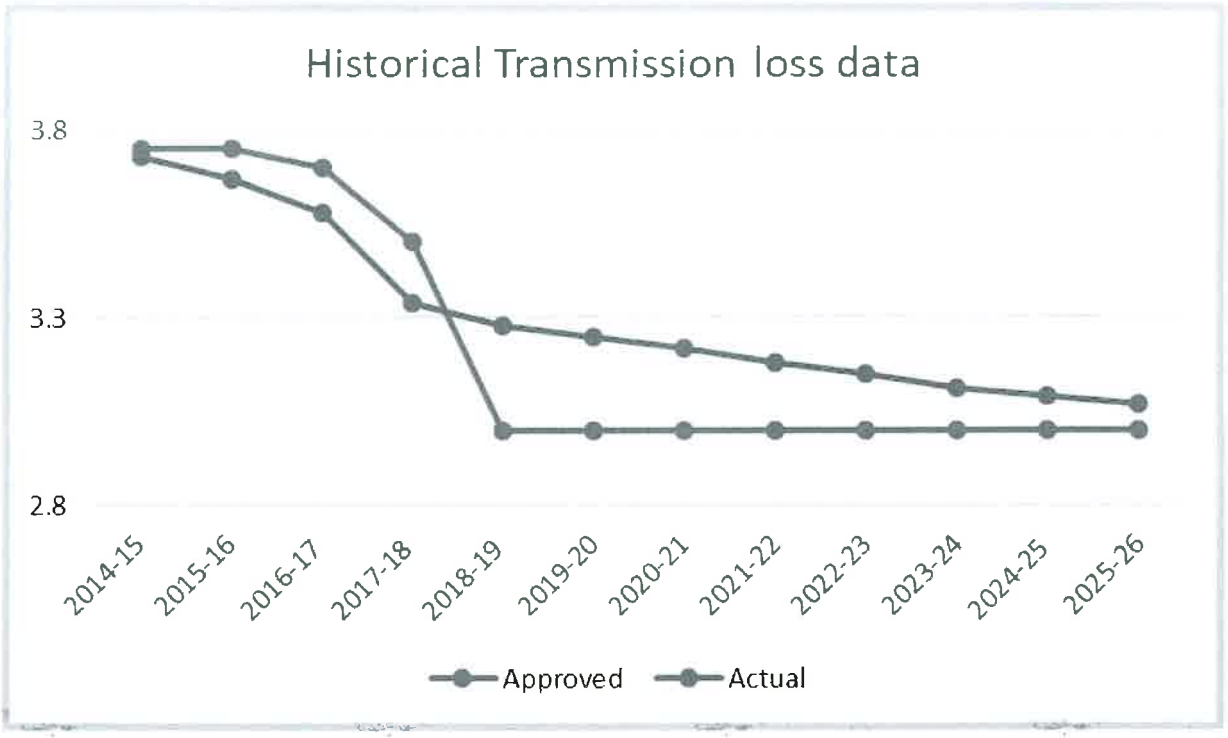
Nasa Krishor Bagale

transmission system of OPTCL operates as an integral part of the Eastern Region Grid to serve the internal demand of the State as well as to carry out import and export of power depending upon the system demand.

As a matter of fact, some grid s/s and lines are being constructed in many remote and deprived areas funded under Central & State Govt. schemes in the interest of public. Additional length in EHT lines and Sub-stations in under-loaded areas are also responsible for increase in transmission loss.

Transmission Loss in OPTCL network is in a gradually reducing trend over the years i.e. from 3.73% during 2014-15 to 3.09% in 2024-25 and has remained 3.07% within 1st six months of FY 2025-26 mainly due to addition of infrastructure and various system strengthening works taken up by OPTCL. The actual losses incurred over the years by OPTCL have been within the margin allowed by Hon'ble Commission up to the year FY 2017-18. However in FY 2018-19, the commission set the loss at 3.00% though the projected transmission loss was at 3.25% and thereafter the commission has been pegging the transmission loss at the same level though loss projected by OPTCL remained in a downward trend.

Year	Tr. Loss proposed	OERC Approval	Actual
2014-15	3.75%	3.75%	3.73%
2015-16	3.75%	3.75%	3.67%
2016-17	3.70%	3.70%	3.58%
2017-18	3.50%	3.50%	3.34%
2018-19	3.25%	3.00%	3.28%
2019-20	3.25%	3.00%	3.25%
2020-21	3.20 %	3.00%	3.22%
2021-22	3.15%	3.00%	3.18%
2022-23	3.10%	3.00%	3.15%
2023-24	3.10%	3.00%	3.11%
2024-25	3.05%	3.00%	3.09%
2025-26	3.05%	3.00%	3.07% (1st six months)



From the table given above, it is also clear that each year upto FY 2017-18, the transmission loss achieved by OPTCL has remained at a level lower than the approved figures by Hon'ble commission and from FY 2018-19 the target set by Hon'ble OERC appears to be very stiff which was hard to achieve though the trend of lesser transmission loss year after year has been achieved.

It may kindly be appreciated that transmission (technical) losses are inevitable in power systems due to the fundamental laws of physics and become increasingly difficult to reduce beyond a certain threshold. Further, at the all-India level, transmission losses across different regions have consistently remained above 3.12%. To substantiate our viewpoint, the transmission loss data for various regions is presented below for the kind consideration of the Hon'ble Commission.

Transmission loss of Different Regions for FY 2023-24

Region	Transmission loss
Northern Region	3.15%
Western Region	3.12%
Southern Region	3.46%
Eastern Region	**4.24% (Odisha- 3.11%)**
North Eastern Region	3.89%

(Courtesy: General Review 2025, Government of India, Ministry of Power, CEA attached as **Annexure-02**)

It may be observed that OPTCL's transmission loss of 3.07% is lower than the average transmission losses of all regions.

However, as a responsible Transmission utility, OPTCL is making an all-out effort to reduce the transmission loss further by undertaking various **system operation and loss reduction measures** by implementing the emerging technologies like **system Automation**, load bifurcation, **modification in system configuration**, procurement of more efficient equipment, **Digitalization of grids** by using SAS, Protection system improvement using Busbar protection and Event Logger, Advanced Metering Infrastructure**, Conversion of Radial to Ring system,** construction of GSS at **higher voltage levels** (220kV & 400kV), Replacement of old conductors and Transformers etc. to bring it to **3.05% by FY 2026-27.**

Steps taken for Energy Audit

Under the PSDF funding, SLDC is implementing the SAMAST project. After operational of SAMAST project, detailed energy auditing is possible.

Regarding inadvertent power

CGPs are not firm sources of power as they are essentially meant for the captive consumption .OPTCL does not agree to the assumption of the respondent that around 985MU of inadvertent power will be injected into the OPTCL system in a year considering the CGP capacity 9850MW. From the Pool Cost data provided by GRIDCO for the first six months of FY 2025-26, it is observed that the total inadvertent power injection is 230.643MU which has been already considered while calculating the Transmission loss of 3.07% in form T-6. Hence, Transmission loss as suggested by the Objector is not just and proper. Details of inadvertent power injected by CGPs in FY 2025-26 till September is furnished as under:

Month	Quantum of inadvertent power (MU)
April-25	38.31
May-25	38.79
Jun-25	39.97
Jul-25	30.39
Aug-25	43.27
Sep-25	39.92
Total	**230.64**

Further, it is submitted that Transmission charge is being computed on Open access transactions based on scheduled energy. Hence, OPTCL does not reap any benefit out of inadvertent power.

Rejoinder to Para 14:

Open Access Charges:

The system peak demand of **7069.89 MW** was touched on 12.08.2025 at 24:00 Hr. Statement on the loading pattern of the existing transmission system (400kV, 220kV & 132kV EHT lines along with loading on ICT, Auto & power transformers) corresponding to the peak demand is submitted in compliance to the OERC queries on ARR application of OPTCL for FY 2026-27 which will submitted to your good self along with this reply. OPTCL has already conducted load flow study considering different load scenarios i.e. Summer peak, Winter lean, High hydro, Low Hydro & Solar Peak in the Revised 14th Intra-state Transmission Plan of Odisha for FY 2022-23 to FY 2026-27, which has been duly approved by Hon'ble Commission vide case no. 08/2024. In the said report, percentage loading of all Transmission lines, ICTs, Auto & Power Transformers till FY 2026-27 have been mentioned. The Transmission infrastructures are being created considering the demand and requests of the DISCOMs/Industries from time to time after due approval form the Hon'ble OERC through Transmission Plan. DISCOMs and other LTA customers are responsible to bear the full approved ARR of OPTCL. STOA charge is being charged as per the Open Access Regulations, 2020.

Further, the revenue earned from STOA transactions is accounted for under Miscellaneous Income and is ultimately deducted from the Gross ARR to arrive at the net recoverable transmission charges to be recovered from consumers, including DISCOMs. Therefore, application of the 1/4th concept would result in an additional burden on domestic consumers. Further, as CERC regulations, the STOA rate is comparatively higher than LTA.

It is pertinent to mention that LTA consumers enjoy the first right and greater benefits compared to MTOA and STOA consumers. Therefore, for industries seeking a reliable, quality, and uninterrupted power supply, availing Long-Term Access (LTA) remains one of the most suitable options.

Rejoinder to Para 15:

Reactive Energy Charges:

As per Regulation 31(1) under Chapter-7 (IMBALANCE AND REACTIVE ENERGY CHARGES) of the OERC (Terms and Conditions of Intra-State Open Access) Regulations, 2020, payment for the reactive energy charges by open access consumers shall be in accordance with provisions stipulated in the State Grid Code or as may be specified in relevant regulations/orders of the Hon'ble Commission .

The Hon'ble Commission in Para 16 (page 5) of the order dated 05.02.2019 in Case No. 50/2017 has inter alia viewed that the provisional reactive energy charges of 3 paise/KVArH as allowed in the ARR order of OPTCL for FY 2018-19 continue for time being till a final justification is submitted by OPTCL in consultation with the stakeholders. However, despite raising reactive energy bills by SLDC since the beginning of FY 2025–26, no amount has been received in the Reactive pool account against Reactive Energy Charges to date due to non-payment by DISCOMs and other LTOA customers.

In view of the above, OPTCL proposes that 3paise/KVARh may be approved provisionally as Reactive Energy Charges for FY 2026-27.

Hence, the proposal of the objector to reduce the reactive energy charges as suggested by OPTCL is not just and proper.

Rejoinder to Para 16 & 17:

Levy of Grid Support Charge for connectivity:

The benefits derived by the CGPs with co-located loads are enormous. The benefits are in the nature of ancillary services which are not paid till now. The Grid support charges (GSC)/Parallel operation charge has been levied by different state Regulatory Commissions and upheld by APTEL and Supreme Court of India through various orders and hence proposed by OPTCL through a separate petition. OPTCL had filed an application (case No. 44 of 2024) on 26.06.2024 for determination and approval for levy of Grid Support Charges for industries having Captive Generating / Cogeneration plants and running in parallel with the Grids of OPTCL. Hon'ble Commission vide its order in case no. 44/2024 directed OPTCL to submit a consolidated report considering the observations/queries raised by the stakeholders in the earlier Cases filed by OPTCL. In compliance to above, OPTCL has filed the requisite report before Hon'ble Commission on 29.01.2025.

Further, it is submitted that a consumer connected to OPTCL network, pays demand charges for the contracted demand to concerned DISCOMs[. The rationale

behind this arrangement is that the corresponding quantum of transmission corridor capacity is reserved for the respective consumer, and only the remaining available capacity in the EHT network is allocated to other consumers. Moreover, it is observed that installed capacity of CGPs are much more than the contracted demand with DISCOMs.

However, it is observed that after synchronization with the grid, CGPs adversely impact grid quality through the injection of harmonics and other disturbances. To address such impacts and ensure grid stability, appropriate charges, namely Grid Support Charges, are required to be levied.

Further, it is submitted that OPTCL has proposed grid support charge factoring the contracted demand signed with DISCOMs by CGPs. So, double charging issue raised by the objector does not arise.

Rejoinder to Para 18:

Necessary system studies are invariably conducted and approvals are granted to RE developers applying for power injection or drawal following the completion of technical and field feasibility assessments.

Further, IT wing of OPTCL has developed a web portal i.e. ***Odisha Grid Insights*** **(OGrI)** portal to publish the key information related to OPTCL EHT Network. This portal will be updated on a monthly basis and will include the following details:

2. Geo-coordinates of all line assets under OPTCL.
3. Present loading data (Minimum & Maximum).
4. Projected load demand within the next 6 months.
5. Transformation capacity.
6. Network status, which will include:
    a. Spare feeders (equipped or not-equipped)
    b. Space available for feeder bays
    c. Possible take-off arrangements (by cable or by overhead)
    d. Evacuation facilities (radial mode or interconnected mode)
    e. Load category (percentage of industrial load vs. domestic load)

The portal is currently operational with most of the above information. The portal can be accessed at the following URL: **https://ogri.optcl.co.in**. This initiative will help RE developers to access the OPTCL network for finding potential injection points.

Rejoinder to Para 19:

Status of key Transmission projects is furnished below:
Project under ISTS

1. **765kV Angul – Gopalpur**
   a. Scheduled date of completion – December 2027.
   b. CERC yet to issue Transmission license to the L1 bidder under TBCB.
2. **765kV Angul – Paradeep**
   a. Scheduled date of completion – November 2026.
   b. CERC yet to issue Transmission license to the L1 bidder under TBCB.

Projects under OPTCL

1. **765kV Kolabira**
   - Approved under 21st CMETS-ER dated 22.08.2023
   - Land identification is in progress
2. **400kV Joda/Barbil (Basudevpur)**
   - Approved under 33rd CMETS-ER dated 05.08.2024
   - Land identification is in progress
   - Project will be executed by OPTCL upon finalisation of funding from Govt. and IP approval from Hon'ble Commission.
3. **400kV Ersama**
   - Scheduled date of completion – June 2026
4. **400kV Neulapoi**
   - Approved under 30th CMETS-ER dated 14.05.2024
   - Tender floated, work started

There is no provision of Capacity charges in the extant OERC Transmission Tariff Regulations, 2014. Since Gridco is procuring power through ISTS network, the transmission charges thereof is dealt by Gridco.

Rejoinder to Para 20:

It is intimated that the Business Plan of OPTCL for the 3rd Control Period, i.e., from FY 2024–25 to FY 2026–27, has been approved by the Hon'ble Commission vide Order dated 24.09.2025 in Case No. 20 of 2025.

Rejoinder to Para 21:

The Revised 14th Intra-State Transmission Plan of Odisha for FY 2022–23 to FY 2026–27 has been approved by the Hon'ble Commission vide Case No. 08/2024. Recently, the investment proposals for 37 projects were heard after inviting suggestions and objections from the general public.

Rejoinder to Para 22:

Initially construction of 400/220kV AIS S/S at Remuli along with associated lines was planned for TBCB . Subsequently, State Government after careful consideration have been decided to construct 400/220kV AIS S/S Remuli(at Basudevpur) and establishment of 2x160 MVA, 220kV GIS S/S at existing Barbil GSS along with associated 400kV & 220kV lines on cost plus method instead of TBCB mode. Accordingly, at present, there is no proposal for execution of any project under TBCB mode.

OPTCL has standardized technical specifications for transmission line towers/steel poles, power transformers, switchgear, surge arresters, CTs, PTs/CVTs, conductors, insulators, fire fighting systems, lighting systems, AC/DC systems, etc., and continues to incorporate improvements as identified for further refinement

Rejoinder to Para 23:

OPTCL maintains an in-house oil testing laboratory that serves as the central facility for analyzing oil breakdown voltage, dissolved gas analysis and PPM measurements. A relay testing laboratory is also planned. OPTCL will approach the Government of Odisha for funding to obtain National Accreditation Board for Testing and Calibration Laboratories (NABL) accreditation for both laboratories.

Rejoinder to Para 24:

No GCC meeting has been conducted in FY 2023-24 and 01 no. GCC meeting has been conducted in FY 2024-25. The details of recent GCC meeting conducted is furnished below:

GCC meeting	Date of meeting
17th GCC meeting	17.01.2025
18th GCC meeting	03.09.2025

OPTCL has already sought agenda items from various stakeholders for the 19th GCC meeting. Further, upon finalization of the agenda, the GCC meeting will be convened shortly. The amount proposed under GCC head will be utilised fully.

Rejoinder to Para 25:

OPTCL will take up the proposal of converting Switching Station to Substation based on the demand projection of DISCOMs and the proposal received by RE developers on a case to case basis with the approvals of Hon'ble Commission.

Rejoinder to Para 26:

The respondent's suggestion has been noted and OPTCL will include the details of loading pattern in the ARR filing of the coming years. Invariably, OPTCL has been sharing the details of loading pattern of all the ICTs, Auto & Power transformers in L-9 format (OERC approved format) as a part of ARR filing every year. Further, loading details corresponding to the maximum demand of **7069.89 MW** on 12.08.2025 has been provided in Compliance to the OERC queries on ARR application of OPTCL in case no. 121/2025.

Rejoinder to Para 27:

Since the creation of transmission infrastructure requires huge investments, OPTCL always requests the state Government for financial support. State Govt. has been contributing 100% financial assistance in the shape of grant/equity in case of non-remunerative and contributing 30% equity support in case of remunerative projects.

Rejoinder to Para 28:

To prevent overloading, regular system study has been carried out and augmented the network capacity as and when required. Priority has been given to use the under loaded network. As directed by Hon'ble Commission, regular meetings are being conducted with DISCOMs for creation and timely completion of downstream infrastructure for optimum utilization of transmission networks. New Transmission elements proposed by OPTCL to strengthen state evacuation are deliberated and approved in the CMETS-ER meeting, held on monthly basis which are further incorporated in National Transmission Network. At present, OPTCL is implementing the STAMS project, under which all network parameters will be monitored centrally. This will enable system operators to take prompt corrective actions, thereby enhancing grid stability and improving overall system efficiency. Further, OPTCL has planned for AI based inspection & maintenance of the Transmission lines and also planning for Asset Performance Management System with AI capabilities for predictive maintenance of its transmission assets.

Rejoinder to Para 29:

As per the provisions of Sections 39 and 40 of the Electricity Act, 2003, OPTCL, being the State Transmission Utility (STU), is responsible for the planning and development of the transmission infrastructure in the State of Odisha. OPTCL obtains inputs from DISCOMs, industries, and generators, and thereafter prepares a comprehensive Intra-State Transmission Plan considering various loading conditions. All new transmission proposals are duly approved by the Hon'ble Commission through the Transmission Planning, Business Plan, and Investment Proposal approval process, wherein DISCOMs and the State Government are among the respondents.

Further, consultations are held with stakeholders through Transmission and Distribution Coordination Committee (TDCC) meetings, Grid Coordination Committee (GCC) meetings, and meetings at the Government level to ensure the optimal utilization of OPTCL's transmission system.

Rejoinder to Para 30:

OPTCL always executes its projects which are either approved in Business Plan of OPTCL or Intra State Transmission Plan. As per the license conditions, OPTCL is mandated to take prior approval of Hon'ble Commission for any transmission projects above Rs. 10 Cr. which OPTCL has been following scrupulously.

Rejoinder to Para 31:

Transmission loss in OPTCL is computed based on the Pool Cost data received from GRIDCO and the Energy Flow Statement issued by SLDC, both of which are prepared using data recorded by energy meters.

Rejoinder to Para 32:

Some of the innovative technologies adopted in OPTCL as under:

- OPTCL has successfully implemented digital substation technology at the 132/33 kV Agalpur–Rampur GSS, wherein fiber optic cables are used in place of conventional copper control cables to transmit current, voltage and control signals digitally. In this system, loss-causing copper elements are eliminated and replaced with fiber optics. Such incremental technological improvements collectively contribute to the reduction of transmission losses.

- Further, OPTCL is continuously replacing existing conductors in transmission lines, where thermal loading is approaching limits, with High Temperature Low Sag (HTLS) conductors, which have lower resistance compared to conventional ACSR conductors.

NOTARY GOVT. OF ODISHA NATABAR MOHANTY BHUBANESWAR ON 20/04 05.07.2030

Nata Kishor Bag

- On an experimental basis, OPTCL has installed a Fiber Optic Current Transformer (FOCT) at Chandaka GSS, thereby eliminating the need for conventional current transformers.

- Furthermore, OPTCL is augmenting age-old transformers with new, energy-efficient transformers, replacing old conductors with new ones, converting radial lines into ring mains, and upgrading single-circuit (S/C) lines to double-circuit (D/C) lines. All these measures collectively result in an overall reduction in transmission losses.

Rejoinder to Para 33:

The following outlines OPTCL's step-by-step Cyclone Mitigation Plan for Odisha's transmission & distribution network. It addresses Commission directives on adequate spares, Emergency Restoration System (ERS), mobile substations, and faster restoration following cyclones.

STEP-BY-STEP CYCLONE MITIGATION PLAN

Governance & Activation:

a) Overall command during a cyclone emergency rests with the Incident Commander, normally the CMD or Managing Director of OPTCL. Sr. General Manager of each zone control field operations, while the State Load Despatch Centre provides real-time grid coordination.

b) This command structure is activated the moment the India Meteorological Department (IMD) issues a cyclone watch or warning. A watch triggers a pre-impact alert; a warning of landfall within forty-eight hours or confirmed multi-tower failures escalates the plan to full mobilisation.

c) State Government bulletins and ground observations supplement the IMD alerts.

Pre-season Preparedness:

a) Every year between January and March, before the cyclone season begins, OPTCL updates a detailed coastal risk map covering a sixty-kilometre buffer from the shoreline. Priority circuits and substations are listed in the Power Atlas and circulated internally.

b) All two strategic depots—Mancheswar and Chatrapur—are audited to verify the availability of Emergency Restoration System (ERS) towers, spare transformers of various MVA ratings, extra-high-tension conductors, insulators,

diesel-generator sets and de-watering pumps. Inventory is replenished to maintain at least a 5% maintenance buffer.

c) During this period, right-of-way corridors are cleared and trees trimmed, short-span interpositions are inspected, and a full functional check is performed on SCADA, OPGW, VSAT and satellite-phone links. Round-the-clock control rooms are tested to ensure operational readiness.

Pre-impact Measures:

a) Once the IMD issues a watch or warning, the Incident Commander issues a formal mobilisation order. This specifies the ERS kits, cranes, truck-mounted 33 kV mobile substations, spare transformers and diesel generators required for each corridor, along with designated staging points.

b) Crews, equipment and at least one ERS kit per priority corridor are moved to pre-cleared rally points, with police and forest permits already in place. Rate-contract gangs are activated.

c) Where necessary, the grid is reconfigured or islanded in advance to reduce cascade risk and to preserve supply to critical facilities such as hospitals, water-supply systems and telecom nodes.

During the Cyclone:

1. Safety is paramount. Field work is suspended whenever sustained wind speeds exceed safe operating limits, and all on-site activity resumes only with clearance from the Safety Officer.
2. Control rooms remain staffed around the clock. SCADA and VSAT systems continue to provide live status updates, and hourly situation reports are transmitted to the State Load Despatch Centre.

Immediate Restoration (First 72 Hours):

I. Within six to twelve hours of landfall—once conditions allow—assessment teams use drones and ground patrols to identify and geo-tag damage. ERS towers are deployed rapidly to bypass collapsed structures and to re-establish ring feeds, giving priority to feeders that supply hospitals, water works and essential communications.

II. If ERS deployment alone cannot restore local grids, truck-mounted 33 kV mobile substations are sent to key district hubs within the sixty-kilometre coastal belt.

Diesel generators pre-installed at substations provide auxiliary power to support these operations and enable permanent repairs.

Medium-Term Recovery (Up to 14 Days):

10. Temporary ERS installations are replaced with permanent towers and foundations designed for Wind Zone VI conditions. Conductors are re-strung and insulators—preferably long-rod or silicone composite for saline environments—are repaired or replaced. Transformer and other high-tension equipment are inspected and restored.
11. Depots are immediately replenished and purchase orders raised to replace used ERS components, conductors and insulators. All regulatory incident reports and applications for State and National Disaster Response Funds are filed as required.

Long-Term Mitigation:

15. Beyond immediate restoration, OPTCL continues to strengthen the network. The DRPS Phase II programme accelerates underground cabling of the most vulnerable urban and coastal corridors and upgrades overhead lines with shorter spans and higher wind-rated towers.
16. A permanent fleet of 33 kV truck-mounted mobile substations will be procured and stationed at DRC hubs so that each coastal division has dedicated rapid-response capacity. An ERS Division—headquartered in Bhubaneswar is being institutionalized to maintain equipment, conduct training and manage mutual-aid agreements with neighbouring utilities and POWERGRID for cranes and heavy hardware.

Capacity Building and Oversight:

13. All ERS crews undergo annual table top and field drills, including full tower erection and mobile-substation commissioning. Weekly patrols, thermo-vision inspections and safety audits are mandated for coastal towers, and results are logged centrally.
14. Recently a five-day mock exercise on the erection of 400 kV ERS towers and stringing of ACSR Twin Moose Conductor was conducted near Bhubaneswar Baliyatra Ground. The program was designed as a refresher and capacity-building initiative, enabling OPTCL engineers to gain hands-on exposure to ERS tower components, erection procedures, and stringing

operations. This exercise not only helped in familiarization and skill enhancement but also strengthened the preparedness of field engineers to effectively respond during exigencies and restoration scenarios.

15. During any event, daily restoration reports are sent to the Odisha Electricity Regulatory Commission and the State Disaster Management Authority, followed by a formal after-action review within seven days.

Regarding design of Multi circuit tower

OPTCL has already standardized the design of multi-circuit towers. At present, such towers are being used in the 220 kV Pandiabil–Samangara transmission line. Further, in many upcoming projects, wherever required, multi-circuit towers are planned to be adopted.

2. The objections not specifically admitted may be deemed to have been denied.

PRAYER

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of M/s. Jindal Steel Limited while approving ARR and Transmission Tariff of OPTCL for FY 2026-27 & Truing up application for FY 2024-25.

By the Applicant
Through

Sr. GM (El.), RT&C

Bhubaneswar
January 27, 2026

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Annexure-01

ODISHA ELECTRICITY REGULATORY COMMISSION
BIDYUT NIYAMAK BHAWAN
PLOT NO.4, CHUNOKOLI, SHAILASHREE VIHAR,
BHUBANESWAR - 751021
TEL. No. 2721048, 2721049, FAX: 2721053/2721057
E-mail: orierc@gmail.com
Website: www.orierc.org

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No. DIR (T)-332/2008/ 177
Dt. 01.02.2021

To

The Managing Director,
OPTCL,
Janpath, Bhubaneswar-22.

Sub: Billing procedure consequent upon implementation of new Open Access Regulations, 2020.

Ref: Your letter No. RT&C-47/2020/18(3) dt.08.01.2021.

Sir,

In inviting a reference to the subject mentioned above, it is to intimate you that transmission tariff of OPTCL is governed under OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 which is still in force.

Regulation 6.5 of Transmission Tariff Regulation, 2014 states as follows:

*"**Transmission Tariff:** The Transmission Tariff payable by the Beneficiaries of the Transmission System shall be designed to recover the Aggregate Revenue Requirement approved by the Commission for each year of the Control Period."*

Regulation 2.1(h) of the same Regulation states that a distribution licensee shall necessarily be a long term transmission customer for which it shall be required to enter into a transmission service agreement with the transmission licensee.

Aggregate Revenue Requirement of the transmission licensee is recovered from the beneficiaries DISCOMs who are long term open access customers. The Commission carryout true up exercise under the same Regulation basing on the actual expenses booked in the audited books of the account of the transmission licensee for the year and expenses allowed in the ARR for the corresponding financial year. Therefore, the approved ARR of the transmission licensee is well taken care of for any short fall on this account. The STU has entered into transmission service agreement with the DISCOMs accordingly.

O/C

The Open Access Regulation, 2020 stipulates that the open access customer who wishes to avail open access under that Regulation shall have to apply for the same. DISCOMs do not come under the same and are governed under Transmission Tariff Regulation, 2014 and consequential special transmission service agreement. The long term customer other than the DISCOMs shall come under OERC Open Access Regulation, 2020.

Therefore, you are required to follow OERC Transmission Tariff Regulation, 2014 scrupulously as long as it is in force.

Yours faithfully,

SECRETARY 1.2.2021

Annexure-02

सत्यमेव जयते

अखिल भारतीय विद्युत सांख्यिकी

All India Electricity Statistics

सामान्य पुनर्विलोकन 2025

(2023-24 के आंकड़े समाविष्ट)

General Review 2025

(Containing Data for the Year 2023-24)

भारत सरकार
विद्युत मंत्रालय
केंद्रीय विद्युत प्राधिकरण
नई दिल्ली
नवंबर 2025

Government of India

Ministry of Power

Central Electricity Authority

New Delhi

November 2025

(अधिनियम 2003 की धारा 73 (आई) एवं (जे) के तहत के. वि. प्रा. के दायित्व के पालन हेतु प्रकाशित)

(Published in fulfilment of CEA's obligation under Section 73(i) & (j) of the Electricity Act 2003)

Table 6.2
Regional Transmission Losses
Utilities
2023-24

Region	Energy Available in the Region (GWh)	Export to other Region (GWh)	Export to Nepal (GWh)	Export to Bangladesh (GWh)	Export to Bhutan (GWh)	Export to Myanmar (GWh)	Total Energy drawal by States/Utilities (GWh)	Transmission Losses (GWh)	Transmission Losses (%)
1	2	3	4	5	6	7	8	9 (2-3-4-5-6-7)	10((8/2)x100)
Northern Region	234996.97	3117.23	170.57	0.00	0.00	0.00	224302.97	7406.20	3.15
Western Region	332120.58	99896.14	0.00	144.00	0.00	0.00	221708.25	10372.19	3.12
Southern Region	212787.85	4758.03	0.00	0.00	0.00	0.00	200663.51	7366.31	3.46
Eastern Region	142021.92	55318.56	1254.36	7315.07	1330.61	0.00	70787.65	6015.68	4.24
North Eastern Region	19710.81	3117.64	0.00	1072.11	0.00	8.47	14746.36	766.23	3.89

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur
Bhubaneswar-751021

Case No: 121/2025
Filing No: 1

IN THE MATTER OF:

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022.

... **Applicant**

AND

IN THE MATTER OF:

M/s. Jindal Stainless Limited, Kalinga Nagar, Industrial Complex, Jajpur, Odisha: 755026

...Respondent

The humble respondent above named most respectfully submit as under:

1. That the objector i.e. M/s. Jindal Stainless Limited (hereinafter referred as "JSL" / "Respondent") is a company incorporated under the provisions of the Companies Act, 1956, having its Registered Office at O.P. Jindal Marg, Hisar- 125005, Haryana and plant site at Kalinga Nagar Industrial Complex, At/Po- Danagadi, PIN-755026, Dist- Jajpur, Odisha.

2. JSL is submitting the following points on the application of OPTCL for determination of Annual Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 for kind review and necessary action by the Hon'ble Commission.

3. **Human Resources Expenses:**

That OPTCL has projected Employee Cost expenditure at Rs. 531.52 Crore for FY 2026-27 against Rs. 488.63 Crore as approved by the Commission to be spent during FY 2025-26. The summary of Employee Expenses of OPTCL for the last sixteen financial years is furnished below.

Rajendra Kumar Tanty

R.P. PANIGRAHI,
D.G.M (LEGAL),
Jindal Stainless Limited,
KNIC, JAJPUR-755026

Summary of Employee Expenses

Financial Year	Proposed	Approved	Actual
2010-11	865.13	279.56	173.11
2011-12	952.06	338.14	279.56
2012-13	655.36	318.48	268.59
2013-14	341.2	289.3	191.70
2014-15	361.38	318.18	309.59
2015-16	310.02	305.23	285.95
2016-17	399.56	292.55	382.44
2017-18	462.33	304.5	380.32
2018-19	419.57	360.4	375.65
2019-20	421.99	419.77	394
2020-21	466.22	415.87	373.19
2021-22	532.73	457.88	474.83
2022-23	526.53	477.19	
2023-24	508.76	449.08	
2024-25	582.06	488.63	
2025-26	554.05	488.63	
2026-27	531.52		

OPTCL may provide a detailed employee list cadre wise approved sanctioned strength by Govt. of Odisha vis-avis actual post filled up and post laying vacant.

The cost break-up of the employee expense is provided below:

Sl. No	Particulars	Prev. Year 2024-25	Curr. Year 2025-26	Ensuring Year 2026-27
A	**Salary & Allowance**	1	2	3
1	Basic Pay	151.82	158.83	159.57
2	Dearness Allowance	79.79	96.89	102.12
3	House Rent Allowance	25.25	23.89	25.77
4	Medical Allowances	7.66	8.34	8.38
5	Conveyance Expenses (Allowance + Reimbursement)	4.13	4.08	6.28
6	Other Allowance	1.63	1.70	1.81
7	Bonus	0.18	0.20	0.20
8	Stipend for New Recruitment	8.09	4.05	5.70

R.P. PANIGRAHI,
D.G.M (LEGAL),
Jindal Stainless Limited,
KNIC, JAJPUR-755026

9	Stipend to Apprentice	1.45	2.00	2.08
10	Arrear Salary for Wage Board Revision			
	Sub-total (A)	280.00	299.59	311.91
B	**Additional Employee Cost**			
1	Out Sources Engagement	3.78	4.34	7.01
	Sub-total (B)	3.78	4.34	7.01
C	**Other Employee Cost**			
1	Leave Travel Concession	0.15	0.59	0.59
2	Honorarium	0.10	0.12	0.19
3	Ex-gratia	6.44	6.50	7.92
4	Staff Welfare Expenses	4.48	7.94	12.02
5	Other Employee Cost	-	0.03	0.04
6	Capacity Building Charges	1.30	2.00	2.40
	Sub-total (C)	12.48	17.19	23.16
D	**Terminal Benefits**			
1	Pension	135.94	140.02	144.22
2	Gratuity	13.22	13.62	14.03
3	Leave Salary	19.91	20.51	21.12
4	Other (including contribution to NPS)	24.46	24.99	26.47
	Sub-total (D)			
E	**Total Employees Cost (A+B+C+D)**	489.78	520.26	547.93
F	Less: Employees Cost Capitalised	16.40	16.40	16.40
G	**Net Employee Cost (E- F)**	473.38	503.85	531.52

1. **Basic Pay and Grade Pay:** Basic Pay and Grade Pay proposed for FY 2026-27 = Rs. **159.57** Cr. is based on actual cash flow for FY 2025-26 with additional increment of 3% and average number of employees. OPTCL is planning to recruit 250 Nos. employees during FY 2025-26 and 50 Nos. in FY 2026-27.
2. **DA:** OPTCL proposed 64% DA for FY 2026-27, considering Finance Dept guidelines. However, actual increases in DA may be reviewed.
3. **HRA:** OPTCL proposed HRA @19%. Actual cash flow may be considered.
4. **Outsourcing:** OPTCL is functioning with 50% of manpower and has outsourced services. Accordingly, Rs. 7.01 Cr. has been proposed towards payment to outsourced personnel. The same can be reviewed.
5. OPTCL is planning to recruit 250 Nos. employees during FY 2025-26 and 50 Nos. in FY 2026-27 and has proposed Rs.05.70 Cr. towards stipend for the new recruiters. Considering the past trend of recruitment the same may be reviewed.
6. Actual addition of employees is lesser than the approved. Stipend and employee cost should be approved by reviewing proposed addition of employees.
7. Terminal benefits should be reviewed on an actual cash flow basis.

Regarding Forecast Parameters

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Hence the Employee cost Expenses of OPTCL for FY 2026-27 may be approved accordingly by the Hon'ble Commission.

4. Repair and Maintenance (R&M) expenses

That OPTCL has projected Repair and Maintenance Expenses at Rs. 259.65 Cr for FY 2026-27 against Rs. 160 Crs as approved by the Commission to be spent during FY 2025-26.

The summary of Repair and Maintenance (R&M) expenses of OPTCL for the last sixteen financial years is furnished below.

Summary of R & M Cost

Financial Year	Proposed	Approved
2010-11	98.14	60
2011-12	93.89	75
2012-13	95.46	95
2013-14	108.91	60
2014-15	146.77	93
2015-16	154.11	108
2016-17	170.66	110.59
2017-18	155.11	124.97
2018-19	156.19	111
2019-20	115.22	115.22
2020-21	140.59	115.22
2021-22	151.1	118.61
2022-23	148.04	110.5
2023-24	164.34	135
2024-25	169.3	135
2025-26	217.7	160
2026-27	259.65	

It is respectfully submitted that R&M cost of OPTCL for FY 2026-27 may be approved accordingly by the Hon'ble Commission.

Rajendra Prasad Panigrahi

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D.G.M (LEGAL),
Jindal Stainless Limited.
KNIC, JAJPUR-755026

5. Administration & General Cost

That OPTCL has projected Administrative and General (A&G) expenditure at Rs. **46.95 Crs** for FY 2026-27 against Rs. **42.46** Crs as approved by the Commission to be spent during FY 2025-26.

The summary of Administrative and General Expenses of OPTCL for the last sixteen financial years is furnished below.

Summary of A&G Cost

Financial Year	Proposed	Approved
2010-11	26.99	15.14
2011-12	38.34	18
2012-13	39.11	21.25
2013-14	23.09	22.39
2014-15	25.46	24.01
2015-16	32.36	24.37
2016-17	25.58	24.66
2017-18	26.11	25.6
2018-19	27.23	26.44
2019-20	28.07	27.55
2020-21	28.66	28.72
2021-22	38.13	30.35
2022-23	43.18	37.73
2023-24	47.07	40.28
2024-25	51.13	37.05
2025-26	49.8	42.46
2026-27	46.95	

The Hon'ble Commission may review the Inspection fee expenses and training expenses. Details of the training calendar and its benefits may be checked.

6. Depreciation Cost

That OPTCL has projected depreciation expenditure at Rs. 337.09 Crs for FY 2026-27 against Rs. 284.33 Crs as approved by the Commission to be spent during FY 2025-26.

The summary of Depreciation of OPTCL for the last sixteen financial years is furnished below.

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Jindal Stainless Limited
KNIC, JAJPUR-755026

Summary of Depreciation Cost

Financial Year	Proposed	Approved
2010-11	153.31	76.6
2011-12	156.4	79.42
2012-13	155.99	78.57
2013-14	172.85	89.4
2014-15	176.02	92.71
2015-16	197.72	107.48
2016-17	150.5	101.45
2017-18	192.59	130.76
2018-19	217.9	145.43
2019-20	186.03	162.06
2020-21	208.59	195.59
2021-22	276.5	232.95
2022-23	263	233.57
2023-24	293.96	269.54
2024-25	320.03	275.67
2025-26	356.57	284.33
2026-27	337.09	

- Norms of tariff regulations and rates as specified in the Transmission Tariff regulations should be considered.
- The depreciation should be determined after due scrutiny.

7. OPTCL has only considered 275.35 Cr towards miscellaneous receipts which needs to be checked prudently. As per regulation 8.30 & 8.40 of Transmission Tariff Regulation all these expenses are to be deducted in full from the ARR for the purpose of calculation of tariff of OPTCL.

8. **Annual Revenue Requirement:**

That the OPTCL has given the proposal for an annual revenue requirement of Rs. 1765.40 Crore for FY 2026-27 against Rs. 1331.02 Crore as approved by the Commission to be spent during FY 2025-26.

The summary of ARR of OPTCL for the last fifteen financial years is furnished below.

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Jindal Stainless Limited,
KNIC. JAIPUR-755026

Financial Year	Proposed	Approved
2011-12	1435.88	579.34
2012-13	1348.46	612.53
2013-14	874.74	597.87
2014-15	988.8	641.3
2015-16	1008.36	630.94
2016-17	975	623.25
2017-18	1013.63	639.4
2018-19	990.65	659.95
2019-20	861.27	706.71
2020-21	966.44	713.84
2021-22	1307.17	792.93
2022-23	1247.14	831.95
2023-24	1102	896.18
2024-25	1380.69	913.7
2025-26	1663.33	1331.02
2026-27	1765.40	

Hence the Annual Revenue Requirement of OPTCL for FY 2026-27 may be approved accordingly through a prudence check and based on the submission made above by the Respondent.

9. Determination of Transmission Charges

OPTCL has given the proposal for transmission charges @ **35.61 P/U** for FY 2026-27 against 25.5 P/Unit as approved by the Commission during FY 2025-26. The proposed Transmission Tariff of **35.61 P/U** is very high and should not be permitted. This will adversely affect the RST of the DISCOMS and will be a huge burden on the consumers of Odisha.

10. The proposal by OPTCL to disallow the rebate on prompt payment for Open Access customers, particularly Long & Medium-Term Open Access customers, needs to be carefully reviewed in the context of its impact on customer relations, operational efficiency, and regulatory guidelines.

While OPTCL has cited that there is no provision for rebate for early payment in the Open Access Regulations of 2020, the previous practice of offering a 2% rebate for payments made within two days was beneficial in encouraging timely payments and improving the cash flow for OPTCL. Discontinuing this rebate may have adverse effects

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on the payment behavior of Open Access customers, leading to potential delays in payment and reduced financial liquidity for OPTCL.

It is also essential to consider the implications of such a move on the competitiveness and attractiveness of Odisha's transmission system to potential Open Access customers. Providing financial incentives, such as the prompt payment rebate, could serve as a mechanism to retain customers and ensure a smoother cash flow for OPTCL. Additionally, a shift in policy might need to be discussed and approved by the Commission to ensure it aligns with the broader regulatory framework and customer service goals. In light of these factors, it is proposed that OPTCL may reconsider the discontinuation of the rebate, or alternatively, propose a revised rebate structure that balances the financial interests of both OPTCL and its Open Access customers. The Commission's input and further deliberation on the matter may be necessary to ensure that the policy is fair, transparent, and in the best interest of all stakeholders.

11. The Open Access Regulations, 2020 treat the DISCOMs and other Open Access users like CGP, and Industrial Consumers on the same footing. However, exceptions is being carved out, wherein the DISCOMs need not submit their contracted quantity and are allowed to pay Transmission Charges on the actual energy transacted, whereas the other OA customers like CGPs, Industries are being forced to pay the Transmission Charges on the Contracted Quantity. Further, OPTCL has proposed to do away with the prompt payment rebate for OA customers like CGPs and Industries while allowing the prompt payment rebate benefit to DISCOMs. This type of differential treatment is against the Open Access Regulation, Grid Code, and statutory provision under the Electricity Act 2003. Therefore, it is requested that the Commission to treat all the Transmission Users i.e. CGPs, Industries, and DISCOM on the same footing with provision for charges, and rebates on the same principle without any discrimination.

12. Transmission Loss:

OPTCL has proposed transmission loss at 3.05%. In conformity with the power sector reform, OPTCL needs to reduce the transmission loss significantly. We propose to approve transmission loss of OPTCL at 2.5%.

That OPTCL has not yet identified the areas where loss is maximum and OPTCL needs to formulate action plans for loss reduction. OPTCL should inform the methodology adopted to estimate the transmission loss for every year. OPTCL should have undertaken energy audits of lines and substations to know the quantum of transmission loss in the system. Proposing the transmission loss arbitrarily without giving the breakup of the losses in different components of transmission system i.e., lines, substations, power transformers and auto transformers etc are not appropriate for the S.T.U. Thus proposing loss as per the business plan is meaningless. There is enough measure by which OPTCL could reduce the Transmission loss. OPTCL should conduct energy audits and their standard performance should be monitored by a third party

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auditor appointed by the Commission so as to assess the actual performance of the licensees.

It is prayed before the Hon'ble Commission may kindly re-calculate and approve transmission loss accordingly.

13. That earlier CGPs used to inject inadvertent power to the grid and GRIDCO availed the benefits of inadvertent power. GRIDCO also used to pay the hydro pool cost towards the inadvertent power. However, from FY 2019-20 onwards GRIDCO has stopped making payment towards inadvertent injections. Hence, OPTCL became the ultimate beneficiary of such injection of inadvertent power. We pray to the Hon'ble Commission to direct OPTCL to submit the detailed list of inadvertent injection for each month by each CGP and consider the same as an additional injection to the grid accordingly to calculate the transmission loss. The data of inadvertent injection is available with OPTCL and SLDC for each month for each CGP who are connected to EHT transmission system of OPTCL. The entire stakeholder and consumers of Odisha will be benefitted by such methodology as the intra-state transmission loss will reduce significantly.

14. Given the significance of maintaining transparency and accuracy in the transmission system's performance, it is requested that OPTCL conduct a Third-Party Energy Audit of its transmission loss. The energy audit should be carried out by an accredited energy auditor in line with the guidelines specified by the regulatory authorities.

The requirement to conduct an annual energy audit is crucial not only for assessing transmission losses but also for identifying potential inefficiencies and implementing corrective actions that can help in optimizing the system's overall performance. This audit will provide an independent, unbiased evaluation of the transmission system's energy losses and help in formulating strategies for loss reduction, which will ultimately contribute to improving the operational efficiency and financial health of OPTCL.

15. Open Access Charges:

Each year Hon'ble OERC informed OPTCL to submit 400 kV, 220 kV, 132 kV Power Transformer and EHT lines loading. OPTCL should make a practice to submit the Power flow data for 400 kV, 220 kV line and 132 kV line and its loading and the entire Auto-transformer loading, Power Transformer and ICT loading along with the ARR application. Moreover, by submitting only power transmitted on the peak demand day will not solve the purpose. In order to ascertain the margin availability, OPTCL may be directed to submit the maximum power handling capability, power flow and % loading of all the 400 kV, 220 kV, 132 kV line and Power Transformer, Auto Transformer, ICT Transformers. It is also desired that OPTCL should conduct load flow analysis to handle around 2000-3000 MW differential load in appropriate manner.

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Once these data are made available, it can be ascertained that, there are sufficient margin is available in the transmission network and in order to utilize it fully, STOA should be promoted and the charges for the same may be kept at 1/4 of the MTOA and LTOA charges and necessary amendments in the regulations may be made.

16. Introduction of Reactive Energy Charges:

OPTCL has proposed to introduce Reactive Energy Charges of 3 Paise / kVARh which is very high and should be reduced in consultation with various stakeholders.

17. Levy of Grid Support Charge for connectivity:

OPTCL has submitted an application to the Hon'ble OERC on 26.06.2024, to determine and approve the imposition of Grid Support Charges for industries with Captive Generating/Cogeneration plants that operate alongside the OPTCL grids.

The case was registered as OERC Case No.-44/2024. In an order dated July 6, 2023, the High Court suggested that if OPTCL wishes to pursue the imposition of Grid Support Charges, they should file a separate application with the OERC. The court emphasized that the OERC, under Section 181 of the Electricity Act, should examine the justifiability of such charges. Hon'ble Commission in order dated 09.07.2024 in case no 44 of 2024 has directed OPTCL to submit a consolidated report considering certain queries. OPTCL has submitted the report on 29.01.2025.

18. It is prayed before the Hon'ble Commission that the levy of Grid Support Charges (GSC) on Captive Generating Plants (CGPs) be abandoned. CGPs are operated by industries that already have a contract demand with the respective DISCOMs, which means they are contributing to the grid through their contracted capacities. The imposition of GSC on CGPs would lead to a scenario where industries are effectively being charged twice for grid support – once through their contract demand with DISCOMs and again via the proposed GSC.

This double charging would result in an unfair financial burden on industries that are already supporting the grid by paying for their contractual obligations. Such a practice could discourage further industrial investments in renewable energy projects, which is counterproductive to the state's objectives of promoting sustainability and industrial growth. Therefore, in the interest of fairness and to avoid unnecessary financial strain on industries, OPTCL should abandon the proposal to levy GSC on CGPs. This would ensure that industries are not unfairly penalized for their contribution to the grid, while also promoting the continued growth of renewable energy in Odisha.

19. It is proposed that OPTCL should proactively prepare and maintain a monthly status report outlining the available transmission lines, substation details, bay availability, and transformer capacity. This would enable prospective developers to assess the existing infrastructure and apply for an NOC for grid connectivity before submitting their applications to the RE nodal agency. By making this information

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accessible, OPTCL can streamline the process for developers, allowing them to submit their grid connectivity applications with more certainty.

Under the current practice, OPTCL does not conduct a prepaid system study unless the project has received approval from a nodal agency. However, it is recommended that OPTCL issue the NOC for grid connectivity based on the available infrastructure information, without requiring a prepaid system study at this early stage. The detailed prepaid system study can be conducted later, once the project has been approved by the relevant nodal agency. This approach would help accelerate the approval process and ensure timely facilitation of renewable energy projects in Odisha, while ensuring that the system remains aligned with the capacity of existing transmission infrastructure.

20. Transmission business being a capital intensive projects requires long term planning. Therefore, Hon'ble OERC may direct OPTCL to submit MYT tariff and long term Business Plan based on which Investment Plan should be provided.

21. That Intrastate transmission system should be developed in a coordinated manner in consultation with CTU, State govt., Generating companies, Regional Power Committees, CEA & licensees. However, such grid coordination meetings are not happening regularly. It is proposed that the grid coordination committee meeting may be conducted regularly. Nos of industries are facing lots of difficulties in getting grid connectivity and enhancement of contract demand. Even the Hon'ble OERC has directed to hold a meeting of OPTCL with DISCOM on a monthly basis to ensure smooth operation of the power sector and MOM to be furnished to OERC. The Hon'ble OERC in its earlier transmission tariff order dated 13.02. 2024 in case no. 113/2023 has directed to submit the revised 14th inter-state transmission plan of OPTCL for approval. OPTCL may kindly submit the status of the 14th inter-state transmission plan of OPTCL and stage wise implementation plan.

22. The Hon'ble OERC has published the OERC (Development of Intra-State Transmission Projects through Tariff Based Competitive Bidding in the State of Odisha) Order, 2022. OPTCL may be directed to submit an action taken report towards execution of new transmission projects. The honorable OERC has earlier directed OPTCL to standardized the transmission line tower, multi-circuit tower etc. the honorable OERC may pass appropriate order.

23. Further, it is proposed that OPTCL should set up an independent testing lab accredited by NABL for testing relays, meters, transformer oils so that such facilities can be availed by industries.

24. It is noted that OPTCL has claimed ₹0.35 Cr towards annual Grid Coordination Committee (GCC) expenses. However, the respondent seeks clarification from OPTCL regarding the number of GCC meetings conducted during FY 2023-24, FY 2024-25 and FY 2025-26. Additionally, OPTCL should provide details of the outcomes from each GCC meeting or make this information publicly available on its website for transparency and accountability.

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The respondent further understands that, as per the provisions of Chapter 11, Clause 2 (2) of the Odisha Grid Code Regulation, 2015, there appears to be a lack of GCC meetings being held in the prescribed manner. It is crucial that the objectives of the GCC, which are to ensure efficient coordination between transmission, distribution, and generation entities, are met as per regulatory requirements. Therefore, OPTCL should clarify the status of GCC meetings, as well as any actions taken to address this issue, ensuring compliance with the Grid Code and the effective functioning of the transmission and distribution system in Odisha.

25. OPTCL should make a standard practice to prepare its ARR application and insert these regular features during the ARR application stage considering all relevant query of Hon'ble OERC. This will be quite helpful for the Respondents as well as for the officials of Hon'ble OERC for conducting proper analysis and scrutiny.

26. The Commission should direct OPTCL to engage with the Government of Odisha to secure funding for economically unviable projects and other critical infrastructure developments that serve the larger interest of the State. Many transmission projects, though essential for grid reliability, regional development, and equitable power access, may not be financially viable solely through tariff-based funding. Government grants can bridge this gap, ensuring that crucial transmission infrastructure is developed without placing an excessive financial burden on consumers. Additionally, state-funded support for such projects would facilitate balanced regional growth, promote industrialization in remote areas, and enhance overall energy security. A coordinated approach between OPTCL and the Government will help in prioritizing strategic projects, optimizing resource allocation, and accelerating execution timelines. Therefore, securing grants for these projects is imperative to ensure a robust and resilient transmission network that supports Odisha's long-term energy and economic goals.

27. The Commission may direct OPTCL to continuously monitor the transmission system's operation and take proactive measures to prevent overloading or under loading which is essential for ensuring an efficient and reliable power network. Overloading can lead to equipment failures, increased technical losses, and reduced system lifespan, while under loading results in inefficient asset utilization and financial strain. By adopting innovative strategies such as dynamic load management, network reconfiguration, real-time data analytics, and grid optimization techniques, OPTCL can achieve optimal loading of the existing infrastructure. This will not only help in reducing transmission losses but also enhance grid stability and improve overall system efficiency. Additionally, leveraging advanced technologies like AI-driven predictive maintenance, demand forecasting, and adaptive grid control will enable a more resilient and cost-effective transmission network. Therefore, continuous monitoring and proactive intervention are necessary to maximize the operational efficiency of the transmission system, ensuring sustainable and economical power transmission for all stakeholders.

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Jindal Stainless Limited,
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28. The Commission's earlier directive for coordinated development of the intra-state transmission network, ISTS, and downstream distribution infrastructure is crucial to ensure optimal asset utilization, financial prudence, and grid stability. Many substations under OPTCL remain under loaded due to the absence of necessary downstream infrastructure from DISCOMs, leading to stranded assets and inefficient capital deployment. To avoid such inefficiencies, it is essential that OPTCL, DISCOMs, and CTU synchronize their planning and execution timelines. This will prevent unnecessary transmission investments that burden consumers with higher tariffs without delivering corresponding benefits. Moreover, ensuring that transmission system strengthening projects align with actual load growth will reduce the risk of power evacuation bottlenecks, voltage fluctuations, and increased transmission losses. A structured, joint planning approach will enhance grid reliability, improve network efficiency, and protect consumer interests. Therefore, the Commission's directive to mandate discussions among stakeholders before execution is a necessary step to ensure a well-integrated, cost-effective, and sustainable power transmission system.

29. Therefore, Transmission system upgrades should be strategically planned rather than implemented in an ad-hoc manner. The Commission should direct that no transmission system strengthening proposals should be executed without the prior approval of the Commission. Strengthening measures should be backed by technical and economic justifications, as required by OPTCL's license conditions and tariff regulations. Transmission projects involve significant capital investments that ultimately impact consumer tariffs. Prior Commission approval ensures that OPTCL implements only necessary and cost-efficient projects. Avoids excessive capital expenditure, which could lead to unjustified tariff hikes for consumers. Aligns investments with the approved capital expenditure (CAPEX) plans under the tariff regulations.

30. OPTCL should be directed to consider the meter data to assess the month-wise transmission loss in intra-state transmission systems including losses at different voltage levels (i.e. 132 kV, 220 kV and 400 kV levels).

31. The power utility has proactively implemented multiple loss reduction strategies, including system automation, load bifurcation, and digitization of the grid. Despite these extensive efforts, the anticipated loss reduction has not been realized, proving that systemic challenges persist beyond mere technical upgrades. Load bifurcation improves local reliability, but its impact on overall transmission loss is minimal, as power still needs to travel long distances from generation to consumption points. The introduction of ring systems instead of radial networks has increased network stability and redundancy, but transmission losses are still governed by physical distance and resistance of the conductors. Advanced transformers and low-loss conductors have been introduced, yet their impact on overall losses will be realized only after complete replacement of old equipment across the entire network. Bay control units (BCUs) and digital substations provide enhanced monitoring and real-time control over power flow, reducing inefficiencies. However, these tools primarily assist in

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identifying losses rather than eliminating them outright. Their full impact will be seen once corrective actions are consistently implemented over a longer duration.

32. It is proposed that Cyclone resilient robust electricity transmission and distribution infrastructure in coastal areas should be established by OPTCL. OPTCL may be directed to submit a report on how many mobile substations are available with them to meet the contingency situation during cyclone and their cyclone mitigation plan which has been earlier directed by Hon'ble OERC. OPTCL has not taken action for the design of multi-circuit and multi voltage transmission lines.

33. We request the Hon'ble Commission to kindly allow the Respondent to submit any additional submissions, memos, documents etc. as may be required and in general do all such things as may be required in connection with the above reply.

PRAYER

In the facts and circumstances stated above and in the interest of the parties and the larger interest of the State the Hon'ble Commission be pleased to pass appropriate orders to the effect that

1. ARR of OPTCL may be approved accordingly based on the submission made above.
2. The Transmission Charges should be reviewed and reduced substantially.
3. Transmission loss to be reduced considering the submission made for FY 2026-27.
4. Proposal of Reactive energy charges of 3 paise/KVARh should be reduced.
5. Proposal of OPTCL to levy of Grid Support Charge for connectivity may be rejected.
6. Each year truing up exercise and business plan approval should be carried out by Hon'ble commission through a process of public hearing.

Place: Bhubaneswar

Date: 10.01.2026

For M/s. Jindal Stainless Limited

Rajendra Prasad Panigrahi

Authorized Signatory

R.P. PANIGRAHI,
D.G.M (LEGAL),
Jindal Stainless Limited,
KNIC, JAJPUR-755026

BEFORE THE **ODISHA ELECTRICITY REGULATORY COMMISSION**
Plot No.4, **Chunokoli, Shailashree Vihar, Chandrasekharpur**
Bhubaneswar-751021

Case No: 121/2025
Filing No: 1

IN THE **MATTER OF:**

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022.

... **Applicant**

AND

IN THE MATTER OF:

M/s. Jindal Stainless Limited, Kalinga Nagar, Industrial Complex, Jajpur, Odisha: 755026

Muralidhar Sahoo
Notary, Bhubaneswar
Bhubaneswar-14
Regd. No-76/2012

...Respondent

Affidavit verifying the application

I, Mr. Rajendra Prasad Panigrahi, Son of Late Anirudha Panigrahi aged about 55 years, working as DGM (Legal) of M/s. Jindal Stainless Limited having its plant site office at Kalinga Nagar Industrial Complex, Jakhapura-755026, Jajpur, Odisha do hereby solemnly affirm and state as follows: -

1. That I am the Authorised person M/s. Jindal Stainless Limited and I am duly authorized to swear this affidavit on its behalf.
2. The statements made herein now are based on information and I believe them to be true

PLACE: Bhubaneswar

DATE: 10.01.2026

Rajendra Prasad Panigrahi

DEPONENT

R.P. PANIGRAHI,
D.G.M (LEGAL),
Jindal Stainless Limited,
KNIC, JAJPUR-755026

NOTARY ★ GOVT OF ODISHA ★

SPECIAL ADHESIVE

Muralidhar Sahoo
Notary, Bhubaneswar
Bhubaneswar-14
Regd. No-76/2012

BEFORE **THE ODISHA ELECTRICITY REGULATORY COMMISSION**
Plot **No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur**
Bhubaneswar-751021

Case No: 121/2025
Filing No: 1

IN THE MATTER OF:

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022

... **Applicant**

AND

M/s. Jindal Stainless Limited, Kalinga Nagar, Industrial Complex, Jajpur, Odisha: 755026

...Respondent

Letter of Authorization

I, Mr. Rajendra Prasad Panigrahi, Son of Late Anirudha Panigrahi aged about 55 years, working as DGM (Legal) of M/s. Jindal Stainless Limited hereby authorize Sri Bibhu Swain, residing at K-8-82, Kalinga Nagar, Ghatikia, Bhubaneswar-751029 to be my representative to present the above case on my behalf before the Hon'ble Odisha Electricity Regulatory Commission relating to my above reply and to submit any additional submission, memos, documents etc. as may be required and in general do all such thing as may be required in connection with the above reply.

For M/s. Jindal Stainless Limited

Rajendra Prasad Panigrahi

Authorized Signatory

R.P. PANIGRAHI,
D.G.M (LEGAL),
Jindal Stainless Limited,
JAJPUR-755026

Place: Bhubaneswar
Date: 15.01.2026

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
PLOT NO. 4, SAILESHREE VIHAR,
CHANDRASEKHARPUR, BHUBANESWAR-751021

CASE NO. 121/2025
FILING NO. 3

IN THE MATTER OF: (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

And

(ii) Truing up application for the FY 2024-25 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

AND
IN THE MATTER OF: Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

..... Applicant

vrs

M/s. Jindal Stainless Limited, Kalinga Nagar, Industrial Complex, Jajpur, Odisha: 755026 and **16 others.**

..... Objectors

Rejoinder to the objections raised by the Objector M/s. Jindal Stainless Limited.

The humble applicant above named

MOST RESPECTFULLY SHEWETH:

1. That the Objector M/s. Jindal Stainless Limited vide affidavit dated 15.01.2026 has raised certain submissions on ARR & Transmission Tariff Application of OPTCL for FY

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2026-27 and Truing up application for FY 2024-25. In reply, OPTCL submits its rejoinder to the submissions in the following paragraphs.

Rejoinder to Para 3 to 8:

The respondent has submitted statistical data of the previous years comparing the proposed vis-à-vis approved in respect of expenses towards human resource expenses, R&M expenses, A&G expenses, depreciation and RoE with a request to approve accordingly after due scrutiny. In this regard, it is pertinent to mention that OPTCL has submitted its ARR application for FY 2026-27 as per the various provisions stipulated in OERC (Terms & Conditions for Determination of Transmission Tariff) Regulations, 2014 and directions of the Commission passed in different orders with proper justifications.

Further, details of Sanctioned strength vis-a-vis actual man in position is furnished below:

Manpower position as on 20.01.2026			
Category	**Sanctioned Strength**	**MIP**	**%**
Executive	2040	1400	68.63%
Non-Executive	3862	1342	34.75%
Total	**5902**	**2742**	**46.46%**

Rejoinder to Para 9:

Determination of Transmission Charges:

The Transmission infrastructures are created considering the demand and request of the DISCOMs / Industries from time to time, after due approval form the Hon'ble OERC through Transmission Plan. Being a Deemed Transmission License, OPTCL has always endeavored to create the Transmission infrastructure for providing reliable and quality power to the consumers of DISCOMs. Accordingly, every year OPTCL is adding more transmission assets to meet the requirement of DISCOMs. Transmission Charge is arrived at 35.61 paise per unit by dividing the total ARR of OPTCL with the recent realistic MU projections of DISCOMs and recovered from them on a monthly basis. This rate will decrease if DISCOMs drawal increases. In fact, OPTCL has consistently advocated for the recovery of transmission charges based on contracted capacity, in line with the practice followed by STUs in other states.

The proposed Transmission Charge of 35.61 p/u has been derived by considering the recent realistic energy demand projections of 41,849.28 MU as

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communicated by the DISCOMs & other LTOA customers and the ARR figures have been arrived by OPTCL justifying component wise projections as per the provisions contained in OERC Transmission Tariff Regulations, 2014, OPTCL's Audited Accounts for FY 2024-25, all relevant data/information and materials. The details of projections are submitted in page 30 of the present ARR application of OPTCL for FY 2026-27. Moreover, OPTCL had furnished all requisite information and details as per the prescribed formats of the Hon'ble Commission with full justifications.

Hence, mere apprehension of the respondent towards imposition of excessive burden on Discoms seems to be inappropriate and unacceptable which is likely to be rejected at this juncture. Moreover, the contention of the stake holder operating in the value chain of electricity needs to appreciate the fact that the cost recovery has to be in full so as to make the sector sustainable.

Rejoinder to Para 10 & 11:

The Hon'ble Commission vide letter no. DIR (T)-332/2008/77 dated 01.02.2021 has clarified that the DISCOMs do not come under the new regulation "OERC (Terms and conditions of Intra state open access) Regulations 2020" and they are governed under OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014. A copy of the said letter is provided as **Annexure-01.** Further, the details of provision of Rebate have been meticulously mentioned in page no: 59 of our ARR application for FY 2026-27 as per the said OERC Regulations.

Rejoinder to Para 12-14:

Transmission Loss

The argument for transmission loss of OPTCL at 2.5% is without any justification. The actual transmission loss for the period **Apr' - Sep' 2025** is calculated to be **3.07%** as shown in the ARR & TT application for FY 2026-27 (page-205). This figure is **less than the actual** transmission loss during last year **i.e. 3.09%** for **FY 2024-25.** In fact, OPTCL had projected a Transmission loss of 3.05% for FY 2025-26, but Hon'ble Commission had set a target of 3.00% which could not be achieved yet.

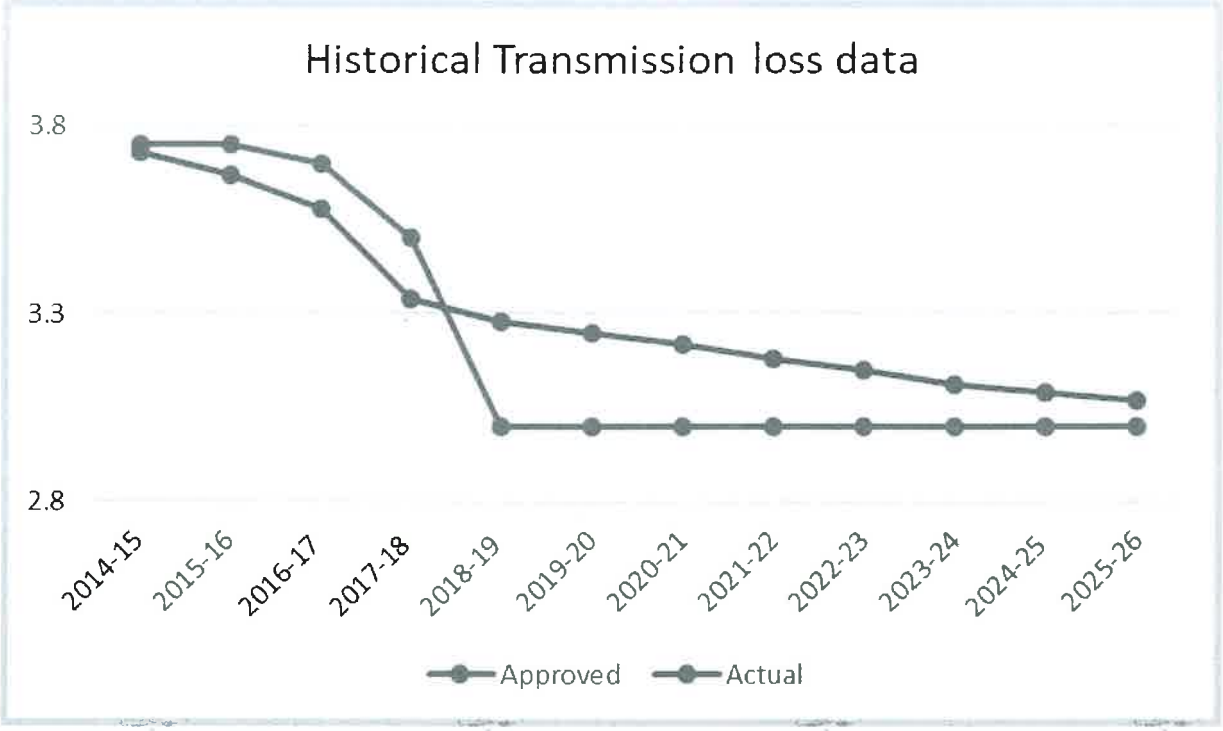
In OPTCL system, the transmission loss is purely technical loss and a function of real time injection of power by a number of generators, system configuration and power flow requirements at different load centers. It depends on many parameters / factors such as distance and mismatch between generation and load centers, types of load, reactive power compensation, voltage profile, seasonal variation of demand load etc. Thus, OPTCL does not have much control over the same at any point of time. The

transmission system of OPTCL operates as an integral part of the Eastern Region Grid to serve the internal demand of the State as well as to carry out import and export of power depending upon the system demand.

As a matter of fact, some grid s/s and lines are being constructed in many remote and deprived areas funded under Central & State Govt. schemes in the interest of public. Additional length in EHT lines and Sub-stations in under-loaded areas are also responsible for increase in transmission loss.

Transmission Loss in OPTCL network is in a gradually reducing trend over the years i.e. from 3.73% during 2014-15 to 3.09% in 2024-25 and has remained 3.07% within 1st six months of FY 2025-26 mainly due to addition of infrastructure and various system strengthening works taken up by OPTCL. The actual losses incurred over the years by OPTCL have been within the margin allowed by Hon'ble Commission up to the year FY 2017-18. However in FY 2018-19, the commission set the loss at 3.00% though the projected transmission loss was at 3.25% and thereafter the commission has been pegging the transmission loss at the same level though loss projected by OPTCL remained in a downward trend.

Year	Tr. Loss proposed	OERC Approval	Actual
2014-15	3.75%	3.75%	3.73%
2015-16	3.75%	3.75%	3.67%
2016-17	3.70%	3.70%	3.58%
2017-18	3.50%	3.50%	3.34%
2018-19	3.25%	3.00%	3.28%
2019-20	3.25%	3.00%	3.25%
2020-21	3.20 %	3.00%	3.22%
2021-22	3.15%	3.00%	3.18%
2022-23	3.10%	3.00%	3.15%
2023-24	3.10%	3.00%	3.11%
2024-25	3.05%	3.00%	3.09%
2025-26	3.05%	3.00%	3.07% (1st six months)



From the table given above, it is also clear that each year upto FY 2017-18, the transmission loss achieved by OPTCL has remained at a level lower than the approved figures by Hon'ble commission and from FY 2018-19 the target set by Hon'ble OERC appears to be very stiff which was hard to achieve though the trend of lesser transmission loss year after year has been achieved.

It may kindly be appreciated that transmission (technical) losses are inevitable in power systems due to the fundamental laws of physics and become increasingly difficult to reduce beyond a certain threshold. Further, at the all-India level, transmission losses across different regions have consistently remained above 3.12%. To substantiate our viewpoint, the transmission loss data for various regions is presented below for the kind consideration of the Hon'ble Commission.

Transmission loss of Different Regions for FY 2023-24

Region	**Transmission loss**
Northern Region	3.15%
Western Region	3.12%
Southern Region	3.46%
Eastern Region	**4.24% (Odisha- 3.11%)**
North Eastern Region	3.89%

(Courtesy: General Review 2025, Government of India, Ministry of Power, CEA attached as **Annexure-02**)

It may be observed that OPTCL's transmission loss of 3.07% is lower than the average transmission losses of all regions.

However, as a responsible Transmission utility, OPTCL is making an all-out effort to reduce the transmission loss further by undertaking various **system operation and loss reduction measures** by implementing the emerging technologies like **system Automation**, load bifurcation, **modification in system configuration**, procurement of more efficient equipment, **Digitalization of grids** by using SAS, Protection system improvement using Busbar protection and Event Logger, Advanced Metering Infrastructure, **Conversion of Radial to Ring system,** construction of GSS at **higher voltage levels** (220kV & 400kV), Replacement of old conductors and Transformers etc. to bring it to **3.05% by FY 2026-27.**

Steps taken for Energy Audit

Under the PSDF funding, SLDC is implementing the SAMAST project. After operational of SAMAST project, detailed energy auditing is possible.

Regarding inadvertent power

CGPs are not firm sources of power as they are essentially meant for the captive consumption .OPTCL does not agree to the assumption of the respondent that around 985MU of inadvertent power will be injected into the OPTCL system in a year considering the CGP capacity 9850MW. From the Pool Cost data provided by GRIDCO for the first six months of FY 2025-26, it is observed that the total inadvertent power injection is 230.643MU which has been already considered while calculating the Transmission loss of 3.07% in form T-6. Hence, Transmission loss as suggested by the Objector is not just and proper. Details of inadvertent power injected by CGPs in FY 2025-26 till September is furnished as under:

Month	Quantum of inadvertent power (MU)
April-25	38.31
May-25	38.79
Jun-25	39.97
Jul-25	30.39
Aug-25	43.27
Sep-25	39.92
Total	**230.64**

Further, it is submitted that Transmission charge is being computed on Open access transactions based on scheduled energy. Hence, OPTCL does not reap any benefit out of inadvertent power.

Rejoinder to Para 15:

Open Access Charges:

The system peak demand of **7069.89 MW** was touched on 12.08.2025 at 24:00 Hr. Statement on the loading pattern of the existing transmission system (400kV, 220kV & 132kV EHT lines along with loading on ICT, Auto & power transformers) corresponding to the peak demand is submitted in compliance to the OERC queries on ARR application of OPTCL for FY 2026-27 which will submitted to your good self along with this reply. OPTCL has already conducted load flow study considering different load scenarios i.e. Summer peak, Winter lean, High hydro, Low Hydro & Solar Peak in the Revised 14th Intra-state Transmission Plan of Odisha for FY 2022-23 to FY 2026-27, which has been duly approved by Hon'ble Commission vide case no. 08/2024. In the said report, percentage loading of all Transmission lines, ICTs, Auto & Power Transformers till FY 2026-27 have been mentioned. The Transmission infrastructures are being created considering the demand and requests of the DISCOMs/Industries from time to time after due approval form the Hon'ble OERC through Transmission Plan. DISCOMs and other LTA customers are responsible to bear the full approved ARR of OPTCL. STOA charge is being charged as per the Open Access Regulations, 2020.

Further, the revenue earned from STOA transactions is accounted for under Miscellaneous Income and is ultimately deducted from the Gross ARR to arrive at the net recoverable transmission charges to be recovered from consumers, including DISCOMs. Therefore, application of the 1/4th concept would result in an additional burden on domestic consumers. Further, as CERC regulations, the STOA rate is comparatively higher than LTA.

It is pertinent to mention that LTA consumers enjoy the first right and greater benefits compared to MTOA and STOA consumers. Therefore, for industries seeking a reliable, quality, and uninterrupted power supply, availing Long-Term Access (LTA) remains one of the most suitable options.

Rejoinder to Para 16:

Reactive Energy Charges:

As per Regulation 31(1) under Chapter-7 (IMBALANCE AND REACTIVE ENERGY CHARGES) of the OERC (Terms and Conditions of Intra-State Open Access) Regulations, 2020, payment for the reactive energy charges by open access consumers shall be in accordance with provisions stipulated in the State Grid Code or as may be specified in relevant regulations/orders of the Hon'ble Commission .

The Hon'ble Commission in Para 16 (page 5) of the order dated 05.02.2019 in Case No. 50/2017 has inter alia viewed that the provisional reactive energy charges of 3 paise/KVArH as allowed in the ARR order of OPTCL for FY 2018-19 continue for time being till a final justification is submitted by OPTCL in consultation with the stakeholders. However, despite raising reactive energy bills by SLDC since the beginning of FY 2025–26, no amount has been received in the Reactive pool account against Reactive Energy Charges to date due to non-payment by DISCOMs and other LTOA customers.

In view of the above, OPTCL proposes that 3paise/KVARh may be approved provisionally as Reactive Energy Charges for FY 2026-27.

Hence, the proposal of the objector to reduce the reactive energy charges as suggested by OPTCL is not just and proper.

Rejoinder to Para 17 & 18:

Levy of Grid Support Charge for connectivity:

The benefits derived by the CGPs with co-located loads are enormous. The benefits are in the nature of ancillary services which are not paid till now. The Grid support charges (GSC)/Parallel operation charge has been levied by different state Regulatory Commissions and upheld by APTEL and Supreme Court of India through various orders and hence proposed by OPTCL through a separate petition. OPTCL had filed an application (case No. 44 of 2024) on 26.06.2024 for determination and approval for levy of Grid Support Charges for industries having Captive Generating / Cogeneration plants and running in parallel with the Grids of OPTCL. Hon'ble Commission vide its order in case no. 44/2024 directed OPTCL to submit a consolidated report considering the observations/queries raised by the stakeholders in the earlier Cases filed by OPTCL. In compliance to above, OPTCL has filed the requisite report before Hon'ble Commission on 29.01.2025.

Further, it is submitted that a consumer connected to OPTCL network, pays demand charges for the contracted demand to concerned DISCOMs[. The rationale

behind this arrangement is that the corresponding quantum of transmission corridor capacity is reserved for the respective consumer, and only the remaining available capacity in the EHT network is allocated to other consumers. Moreover, it is observed that installed capacity of CGPs are much more than the contracted demand with DISCOMs.

However, it is observed that after synchronization with the grid, CGPs adversely impact grid quality through the injection of harmonics and other disturbances. To address such impacts and ensure grid stability, appropriate charges, namely Grid Support Charges, are required to be levied.

Further, it is submitted that OPTCL has proposed grid support charge factoring the contracted demand signed with DISCOMs by CGPs. So, double charging issue raised by the objector does not arise.

Rejoinder to Para 19:

Necessary system studies are invariably conducted and approvals are granted to RE developers applying for power injection or drawal following the completion of technical and field feasibility assessments.

Further, IT wing of OPTCL has developed a web portal i.e. ***Odisha Grid Insights*** **(OGrI)** portal to publish the key information related to OPTCL EHT Network. This portal will be updated on a monthly basis and will include the following details:

2. Geo-coordinates of all line assets under OPTCL.
3. Present loading data (Minimum & Maximum).
4. Projected load demand within the next 6 months.
5. Transformation capacity.
6. Network status, which will include:
   a. Spare feeders (equipped or not-equipped)
   b. Space available for feeder bays
   c. Possible take-off arrangements (by cable or by overhead)
   d. Evacuation facilities (radial mode or interconnected mode)
   e. Load category (percentage of industrial load vs. domestic load)

The portal is currently operational with most of the above information. The portal can be accessed at the following URL: **https://ogri.optcl.co.in**. This initiative will help RE developers to access the OPTCL network for finding potential injection points.

Rejoinder to Para 20:

It is intimated that the Business Plan of OPTCL for the 3rd Control Period, i.e., from FY 2024–25 to FY 2026–27, has been approved by the Hon'ble Commission vide Order dated 24.09.2025 in Case No. 20 of 2025.

Rejoinder to Para 21:

The Revised 14th Intra-State Transmission Plan of Odisha for FY 2022–23 to FY 2026–27 has been approved by the Hon'ble Commission vide Case No. 08/2024. Recently, the investment proposals for 37 projects were heard after inviting suggestions and objections from the general public.

Rejoinder to Para 22:

Initially construction of 400/220kV AIS S/S at Remuli along with associated lines was planned for TBCB . Subsequently, State Government after careful consideration have been decided to construct 400/220kV AIS S/S Remuli(at Basudevpur) and establishment of 2x160 MVA, 220kV GIS S/S at existing Barbil GSS along with associated 400kV & 220kV lines on cost plus method instead of TBCB mode. Accordingly, at present, there is no proposal for execution of any project under TBCB mode.

OPTCL has standardized technical specifications for transmission line towers/steel poles, power transformers, switchgear, surge arresters, CTs, PTs/CVTs, conductors, insulators, fire fighting systems, lighting systems, AC/DC systems, etc., and continues to incorporate improvements as identified for further refinement

Rejoinder to Para 23:

OPTCL maintains an in-house oil testing laboratory that serves as the central facility for analyzing oil breakdown voltage, dissolved gas analysis and PPM measurements. A relay testing laboratory is also planned. OPTCL will approach the Government of Odisha for funding to obtain National Accreditation Board for Testing and Calibration Laboratories (NABL) accreditation for both laboratories.

Rejoinder to Para 24:

No GCC meeting has been conducted in FY 2023-24 and 01 no. GCC meeting has been conducted in FY 2024-25. The details of recent GCC meeting conducted is furnished below:

GCC meeting	Date of meeting
17th GCC meeting	17.01.2025
18th GCC meeting	03.09.2025

OPTCL has already sought agenda items from various stakeholders for the 19th GCC meeting. Further, upon finalization of the agenda, the GCC meeting will be convened shortly. The amount proposed under GCC head will be utilised fully.

Rejoinder to Para 25:

The respondent's suggestion has been noted and OPTCL will include the details of loading pattern in the ARR filing of the coming years. Invariably, OPTCL has been sharing the details of loading pattern of all the ICTs, Auto & Power transformers in L-9 format (OERC approved format) as a part of ARR filing every year. Further, loading details corresponding to the maximum demand of **7069.89 MW** on 12.08.2025 has been provided in Compliance to the OERC queries on ARR application of OPTCL in case no. 121/2025.

Rejoinder to Para 26:

Since the creation of transmission infrastructure requires huge investments, OPTCL always requests the state Government for financial support. State Govt. has been contributing 100% financial assistance in the shape of grant/equity in case of non-remunerative and contributing 30% equity support in case of remunerative projects.

Rejoinder to Para 27:

To prevent overloading, regular system study has been carried out and augmented the network capacity as and when required. Priority has been given to use the under loaded network. As directed by Hon'ble Commission, regular meetings are being conducted with DISCOMs for creation and timely completion of downstream infrastructure for optimum utilization of transmission networks. New Transmission elements proposed by OPTCL to strengthen state evacuation are deliberated and approved in the CMETS-ER meeting, held on monthly basis which are further incorporated in National Transmission Network. At present, OPTCL is implementing the

STAMS project, under which all network parameters will be monitored centrally. This will enable system operators to take prompt corrective actions, thereby enhancing grid stability and improving overall system efficiency. Further, OPTCL has planned for AI based inspection & maintenance of the Transmission lines and also planning for Asset Performance Management System with AI capabilities for predictive maintenance of its transmission assets.

Rejoinder to Para 28:

As per the provisions of Sections 39 and 40 of the Electricity Act, 2003, OPTCL, being the State Transmission Utility (STU), is responsible for the planning and development of the transmission infrastructure in the State of Odisha. OPTCL obtains inputs from DISCOMs, industries, and generators, and thereafter prepares a comprehensive Intra-State Transmission Plan considering various loading conditions. All new transmission proposals are duly approved by the Hon'ble Commission through the Transmission Planning, Business Plan, and Investment Proposal approval process, wherein DISCOMs and the State Government are among the respondents.

Further, consultations are held with stakeholders through Transmission and Distribution Coordination Committee (TDCC) meetings, Grid Coordination Committee (GCC) meetings, and meetings at the Government level to ensure the optimal utilization of OPTCL's transmission system.

Rejoinder to Para 29:

OPTCL always executes its projects which are either approved in Business Plan of OPTCL or Intra State Transmission Plan. As per the license conditions, OPTCL is mandated to take prior approval of Hon'ble Commission for any transmission projects above Rs. 10 Cr. which OPTCL has been following scrupulously.

Rejoinder to Para 30:

Transmission loss in OPTCL is computed based on the Pool Cost data received from GRIDCO and the Energy Flow Statement issued by SLDC, both of which are prepared using data recorded by energy meters.

Rejoinder to Para 31:

Some of the innovative technologies adopted in OPTCL as under:

- OPTCL has successfully implemented digital substation technology at the 132/33 kV Agalpur–Rampur GSS, wherein fiber optic cables are used in place of conventional copper control cables to transmit current, voltage and control signals digitally. In this system, loss-causing copper elements are eliminated and replaced with fiber optics. Such incremental

technological improvements collectively contribute to the reduction of transmission losses.

- Further, OPTCL is continuously replacing existing conductors in transmission lines, where thermal loading is approaching limits, with High Temperature Low Sag (HTLS) conductors, which have lower resistance compared to conventional ACSR conductors.

- On an experimental basis, OPTCL has installed a Fiber Optic Current Transformer (FOCT) at Chandaka GSS, thereby eliminating the need for conventional current transformers.

- Furthermore, OPTCL is augmenting age-old transformers with new, energy-efficient transformers, replacing old conductors with new ones, converting radial lines into ring mains, and upgrading single-circuit (S/C) lines to double-circuit (D/C) lines. All these measures collectively result in an overall reduction in transmission losses.

Rejoinder to Para 32:

The following outlines OPTCL's step-by-step Cyclone Mitigation Plan for Odisha's transmission & distribution network. It addresses Commission directives on adequate spares, Emergency Restoration System (ERS), mobile substations, and faster restoration following cyclones.

STEP-BY-STEP CYCLONE MITIGATION PLAN

Governance & Activation:

a) Overall command during a cyclone emergency rests with the Incident Commander, normally the CMD or Managing Director of OPTCL. Sr. General Manager of each zone control field operations, while the State Load Despatch Centre provides real-time grid coordination.

b) This command structure is activated the moment the India Meteorological Department (IMD) issues a cyclone watch or warning. A watch triggers a pre-impact alert; a warning of landfall within forty-eight hours or confirmed multi-tower failures escalates the plan to full mobilisation.

c) State Government bulletins and ground observations supplement the IMD alerts.

Pre-season Preparedness:

a) Every year between January and March, before the cyclone season begins, OPTCL updates a detailed coastal risk map covering a sixty-kilometre buffer from the shoreline. Priority circuits and substations are listed in the Power Atlas and circulated internally.

b) All two strategic depots—Mancheswar and Chatrapur—are audited to verify the availability of Emergency Restoration System (ERS) towers, spare transformers of various MVA ratings, extra-high-tension conductors, insulators, diesel-generator sets and de-watering pumps. Inventory is replenished to maintain at least a 5% maintenance buffer.

c) During this period, right-of-way corridors are cleared and trees trimmed, short-span interpositions are inspected, and a full functional check is performed on SCADA, OPGW, VSAT and satellite-phone links. Round-the-clock control rooms are tested to ensure operational readiness.

Pre-impact Measures:

a) Once the IMD issues a watch or warning, the Incident Commander issues a formal mobilisation order. This specifies the ERS kits, cranes, truck-mounted 33 kV mobile substations, spare transformers and diesel generators required for each corridor, along with designated staging points.

b) Crews, equipment and at least one ERS kit per priority corridor are moved to pre-cleared rally points, with police and forest permits already in place. Rate-contract gangs are activated.

c) Where necessary, the grid is reconfigured or islanded in advance to reduce cascade risk and to preserve supply to critical facilities such as hospitals, water-supply systems and telecom nodes.

During the Cyclone:

1. Safety is paramount. Field work is suspended whenever sustained wind speeds exceed safe operating limits, and all on-site activity resumes only with clearance from the Safety Officer.
2. Control rooms remain staffed around the clock. SCADA and VSAT systems continue to provide live status updates, and hourly situation reports are transmitted to the State Load Despatch Centre.



Immediate Restoration (First 72 Hours):

I. Within six to twelve hours of landfall—once conditions allow—assessment teams use drones and ground patrols to identify and geo-tag damage. ERS towers are deployed rapidly to bypass collapsed structures and to re-establish ring feeds, giving priority to feeders that supply hospitals, water works and essential communications.

II. If ERS deployment alone cannot restore local grids, truck-mounted 33 kV mobile substations are sent to key district hubs within the sixty-kilometre coastal belt. Diesel generators pre-installed at substations provide auxiliary power to support these operations and enable permanent repairs.

Medium-Term Recovery (Up to 14 Days):

10. Temporary ERS installations are replaced with permanent towers and foundations designed for Wind Zone VI conditions. Conductors are re-strung and insulators—preferably long-rod or silicone composite for saline environments—are repaired or replaced. Transformer and other high-tension equipment are inspected and restored.

11. Depots are immediately replenished and purchase orders raised to replace used ERS components, conductors and insulators. All regulatory incident reports and applications for State and National Disaster Response Funds are filed as required.

Long-Term Mitigation:

15. Beyond immediate restoration, OPTCL continues to strengthen the network. The DRPS Phase II programme accelerates underground cabling of the most vulnerable urban and coastal corridors and upgrades overhead lines with shorter spans and higher wind-rated towers.

16. A permanent fleet of 33 kV truck-mounted mobile substations will be procured and stationed at DRC hubs so that each coastal division has dedicated rapid-response capacity. An ERS Division—headquartered in Bhubaneswar is being institutionalized to maintain equipment, conduct training and manage mutual-aid agreements with neighbouring utilities and POWERGRID for cranes and heavy hardware.

Capacity Building and Oversight:

13. All ERS crews undergo annual table top and field drills, including full tower erection and mobile-substation commissioning. Weekly patrols, thermo-vision inspections and safety audits are mandated for coastal towers, and results are logged centrally.
14. Recently a five-day mock exercise on the erection of 400 kV ERS towers and stringing of ACSR Twin Moose Conductor was conducted near Bhubaneswar Baliyatra Ground. The program was designed as a refresher and capacity-building initiative, enabling OPTCL engineers to gain hands-on exposure to ERS tower components, erection procedures, and stringing operations. This exercise not only helped in familiarization and skill enhancement but also strengthened the preparedness of field engineers to effectively respond during exigencies and restoration scenarios.
15. During any event, daily restoration reports are sent to the Odisha Electricity Regulatory Commission and the State Disaster Management Authority, followed by a formal after-action review within seven days.

Regarding design of Multi circuit tower

OPTCL has already standardized the design of multi-circuit towers. At present, such towers are being used in the 220 kV Pandiabil–Samangara transmission line. Further, in many upcoming projects, wherever required, multi-circuit towers are planned to be adopted.

2. The objections not specifically admitted may be deemed to have been denied.

PRAYER

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of M/s. Jindal Stainless Limited while approving ARR and Transmission Tariff of OPTCL for FY 2026-27 & Truing up application for the FY 2024-25.

By the Applicant
Through

Bhubaneswar
January 27, 2026

Nabakishore Bag
Sr. GM (El.), RT&C

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Annexure-01

ODISHA ELECTRICITY REGULATORY COMMISSION
BIDYUT NIYAMAK BHAWAN
PLOT NO.4, CHUNOKOLI, SHAILASHREE VIHAR,
BHUBANESWAR - 751021
TEL. No. 2721048, 2721049, FAX: 2721053/2721057
E-mail: orierc@gmail.com
Website: www.orierc.org

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No. DIR (T)-332/2008/ 177
Dt. 01.02.2021

To

The Managing Director,
OPTCL,
Janpath, Bhubaneswar-22.

Sub: Billing procedure consequent upon implementation of new Open Access Regulations, 2020.

Ref: Your letter No. RT&C-47/2020/18(3) dt.08.01.2021.

Sir,

In inviting a reference to the subject mentioned above, it is to intimate you that transmission tariff of OPTCL is governed under OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 which is still in force.

Regulation 6.5 of Transmission Tariff Regulation, 2014 states as follows:

*"**Transmission Tariff:** The Transmission Tariff payable by the Beneficiaries of the Transmission System shall be designed to recover the Aggregate Revenue Requirement approved by the Commission for each year of the Control Period."*

Regulation 2.1(h) of the same Regulation states that a distribution licensee shall necessarily be a long term transmission customer for which it shall be required to enter into a transmission service agreement with the transmission licensee.

Aggregate Revenue Requirement of the transmission licensee is recovered from the beneficiaries DISCOMs who are long term open access customers. The Commission carryout true up exercise under the same Regulation basing on the actual expenses booked in the audited books of the account of the transmission licensee for the year and expenses allowed in the ARR for the corresponding financial year. Therefore, the approved ARR of the transmission licensee is well taken care of for any short fall on this account. The STU has entered into transmission service agreement with the DISCOMs accordingly.

O/C

The Open Access Regulation, 2020 stipulates that the open access customer who wishes to avail open access under that Regulation shall have to apply for the same. DISCOMs do not come under the same and are governed under Transmission Tariff Regulation, 2014 and consequential special transmission service agreement. The long term customer other than the DISCOMs shall come under OERC Open Access Regulation, 2020.

Therefore, you are required to follow OERC Transmission Tariff Regulation, 2014 scrupulously as long as it is in force.

Yours faithfully,

SECRETARY 1.2.2021

Annexure-02

सत्यमेव जयते

अखिल भारतीय विद्युत सांख्यिकी

All India Electricity Statistics

सामान्य पुनर्विलोकन 2025

(2023-24 के आंकड़े समाविष्ट)

General Review 2025

(Containing Data for the Year 2023-24)

भारत सरकार
विद्युत मंत्रालय
केंद्रीय विद्युत प्राधिकरण
नई दिल्ली
नवंबर 2025

Government of India

Ministry of Power

Central Electricity Authority

New Delhi

November 2025

(अधिनियम 2003 की धारा 73 (आई) एवं (जे) के तहत के. वि. प्रा. के दायित्व के पालन हेतु प्रकाशित)

(Published in fulfilment of CEA's obligation under Section 73(i) & (j) of the Electricity Act 2003)

Table 6.2
Regional Transmission Losses
Utilities
2023-24

Region	Energy Available in the Region (GWh)	Export to other Region (GWh)	Export to Nepal (GWh)	Export to Bangladesh (GWh)	Export to Bhutan (GWh)	Export to Myanmar (GWh)	Total Energy drawal by States/Utilities (GWh)	Transmission Losses (GWh)	Transmission Losses (%)
1	2	3	4	5	6	7	8	9 (2-3-4-5-6-7)	10((8/2)x100)
Northern Region	234996.97	3117.23	170.57	0.00	0.00	0.00	224302.97	7406.20	3.15
Western Region	332120.58	99896.14	0.00	144.00	0.00	0.00	221708.25	10372.19	3.12
Southern Region	212787.85	4758.03	0.00	0.00	0.00	0.00	200663.51	7366.31	3.46
Eastern Region	142021.92	55318.56	1254.36	7315.07	1330.61	0.00	70787.65	6015.68	4.24
North Eastern Region	19710.81	3117.64	0.00	1072.11	0.00	8.47	14746.36	766.23	3.89

BEFORE PRATAP NARAYAN TIWARI
NOTARY, JHARSUGUDA
REGD. No.- ON 01/13
SL. No.....20.DT...13.1.26

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur
Bhubaneswar-751021

Case No: 121/2025
Filing No: 1

IN THE MATTER OF:

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022.

... **Applicant**

AND

IN THE MATTER OF:

M/s. Bhushan Power and Steel Limited, having manufacturing unit at P.O-Lapanga, P.S-Thelkoloi, Teh-Rengali, Sambalpur, Odisha-768212, Email: rakesh.pujari@jsw.in

...Respondent

The humble respondent above named most respectfully submit as under:

1. That the respondnet i.e. M/s. Bhushan Power and Steel Limited (hereinafter referred as "BPSL"/ "Respondent") is a company incorporated under the provisions of the Companies Act, 1956, having its registered office at 4th Floor, A-2, NTH Complex, Shaheed Jeet Singh Marg, Qutab Institutional Area, New Delhi- 110067 and one of its captive power plants at its manufacturing unit at P.O-Lapanga, P.S. Thelkoloi, Teh-Rengali, Sambalpur, Odisha-768212.

2. That the Respondent is submitting the following points on the application of OPTCL for determination of Annual Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 for kind review and necessary action by the Hon'ble Commission.

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3. Human Resources Expenses:

That OPTCL has projected Employee Cost expenditure at Rs. 531.52 Crore for FY 2026-27 against Rs. 488.63 Crore as approved by the Commission to be spent during FY 2025-26. The summary of Employee Expenses of OPTCL for the last sixteen financial years is furnished below.

Summary of Employee Expenses

Financial Year	Proposed	Approved	Actual
2010-11	865.13	279.56	173.11
2011-12	952.06	338.14	279.56
2012-13	655.36	318.48	268.59
2013-14	341.2	289.3	191.70
2014-15	361.38	318.18	309.59
2015-16	310.02	305.23	285.95
2016-17	399.56	292.55	382.44
2017-18	462.33	304.5	380.32
2018-19	419.57	360.4	375.65
2019-20	421.99	419.77	394
2020-21	466.22	415.87	373.19
2021-22	532.73	457.88	474.83
2022-23	526.53	477.19	
2023-24	508.76	449.08	
2024-25	582.06	488.63	
2025-26	554.05	488.63	
2026-27	531.52		

OPTCL may provide a detailed employee list cadre wise approved sanctioned strength by Govt. of Odisha vis-avis actual post filled up and post laying vacant.

The cost break-up of the employee expense is provided below:

Sl. No	Particulars	Prev. Year 2024-25	Curr. Year 2025-26	Ensuring Year 2026-27
A	**Salary & Allowance**	1	2	3
1	Basic Pay	151.82	158.83	159.57
2	Dearness Allowance	79.79	96.89	102.12
3	House Rent Allowance	25.25	23.89	25.77
4	Medical Allowances	7.66	8.34	8.38
5	Conveyance Expenses (Allowance + Reimbursement)	4.13	4.08	6.28
6	Other Allowance	1.63	1.70	1.81
7	Bonus	0.18	0.20	0.20
8	Stipend for New Recruitment	8.09	4.05	5.70
9	Stipend to Apprentice	1.45	2.00	2.08
10	Arrear Salary for Wage Board Revision			
	Sub-total (A)	280.00	299.59	311.91
B	**Additional Employee Cost**			
1	Out Sources Engagement	3.78	4.34	7.01
	Sub-total (B)	3.78	4.34	7.01
C	**Other Employee Cost**			
1	Leave Travel Concession	0.15	0.59	0.59
2	Honorarium	0.10	0.12	0.19
3	Ex-gratia	6.44	6.50	7.92
4	Staff Welfare Expenses	4.48	7.94	12.02
5	Other Employee Cost	-	0.03	0.04
6	Capacity Building Charges	1.30	2.00	2.40
	Sub-total (C)	12.48	17.19	23.16
D	**Terminal Benefits**			
1	Pension	135.94	140.02	144.22
2	Gratuity	13.22	13.62	14.03
3	Leave Salary	19.91	20.51	21.12
4	Other (including contribution to NPS)	24.46	24.99	26.47
	Sub-total (D)			
E	**Total Employees Cost (A+B+C+D)**	489.78	520.26	547.93
F	Less: Employees Cost Capitalised	16.40	16.40	16.40
G	**Net Employee Cost (E- F)**	473.38	503.85	531.52

1. **Basic Pay and Grade Pay:** Basic Pay and Grade Pay proposed for FY 2026-27 = Rs. **159.57** Cr. is based on actual cash flow for FY 2025-26 with additional increment of 3% and average number of employees. OPTCL is planning to recruit 250 Nos. employees during FY 2025-26 and 50 Nos. in FY 2026-27.
2. **DA:** OPTCL proposed 64% DA for FY 2026-27, considering Finance Dept guidelines. However, actual increases in DA may be reviewed.
3. **HRA:** OPTCL proposed HRA @19%. Actual cash flow may be considered.
4. **Outsourcing:** OPTCL is functioning with 50% of manpower and has outsourced services. Accordingly, Rs. 7.01 Cr. has been proposed towards payment to outsourced personnel. The same can be reviewed.
5. OPTCL is planning to recruit 250 Nos. employees during FY 2025-26 and 50 Nos. in FY 2026-27 and has proposed Rs.05.70 Cr. towards stipend for the new recruiters. Considering the past trend of recruitment the same may be reviewed.
6. Actual addition of employees is lesser than the approved. Stipend and employee cost should be approved by reviewing proposed addition of employees.
7. Terminal benefits should be reviewed on an actual cash flow basis.

Hence the Employee cost Expenses of OPTCL for FY 2026-27 may be approved accordingly by the Hon'ble Commission.

4. Repair and Maintenance (R&M) expenses

That OPTCL has projected Repair and Maintenance Expenses at Rs. 259.65 Cr for FY 2026-27 against Rs. 160 Crs as approved by the Commission to be spent during FY 2025-26.

The summary of Repair and Maintenance (R&M) expenses of OPTCL for the last sixteen financial years is furnished below.

Summary of R & M Cost

Financial Year	Proposed	Approved
2010-11	98.14	60
2011-12	93.89	75
2012-13	95.46	95
2013-14	108.91	60
2014-15	146.77	93
2015-16	154.11	108
2016-17	170.66	110.59
2017-18	155.11	124.97

2018-19	156.19	111
2019-20	115.22	115.22
2020-21	140.59	115.22
2021-22	151.1	118.61
2022-23	148.04	110.5
2023-24	164.34	135
2024-25	169.3	135
2025-26	217.7	160
2026-27	259.65	

It is respectfully submitted that R&M cost of OPTCL for FY 2026-27 may be approved accordingly by the Hon'ble Commission.

5. Administration & General Cost

That OPTCL has projected Administrative and General (A&G) expenditure at Rs. **46.95 Crs** for FY 2026-27 against Rs. **42.46** Crs as approved by the Commission to be spent during FY 2025-26.

The summary of Administrative and General Expenses of OPTCL for the last sixteen financial years is furnished below.

Summary of A&G Cost

Financial Year	Proposed	Approved
2010-11	26.99	15.14
2011-12	38.34	18
2012-13	39.11	21.25
2013-14	23.09	22.39
2014-15	25.46	24.01
2015-16	32.36	24.37
2016-17	25.58	24.66
2017-18	26.11	25.6
2018-19	27.23	26.44
2019-20	28.07	27.55
2020-21	28.66	28.72

2021-22	38.13	30.35
2022-23	43.18	37.73
2023-24	47.07	40.28
2024-25	51.13	37.05
2025-26	49.8	42.46
2026-27	46.95	

The Hon'ble Commission may review the Inspection fee expenses and training expenses. Details of the training calendar and its benefits may be checked.

6. Depreciation Cost

That OPTCL has projected depreciation expenditure at Rs. 337.09 Crs for FY 2026-27 against Rs. 284.33 Crs as approved by the Commission to be spent during FY 2025-26.

The summary of Depreciation of OPTCL for the last sixteen financial years is furnished below.

Summary of Depreciation Cost

Financial Year	Proposed	Approved
2010-11	153.31	76.6
2011-12	156.4	79.42
2012-13	155.99	78.57
2013-14	172.85	89.4
2014-15	176.02	92.71
2015-16	197.72	107.48
2016-17	150.5	101.45
2017-18	192.59	130.76
2018-19	217.9	145.43
2019-20	186.03	162.06
2020-21	208.59	195.59
2021-22	276.5	232.95
2022-23	263	233.57
2023-24	293.96	269.54
2024-25	320.03	275.67

2025-26	356.57	284.33
2026-27	337.09	

- Norms of tariff regulations and rates as specified in the Transmission Tariff regulations should be considered.
- The depreciation should be determined after due scrutiny.

7. OPTCL has only considered 275.35 Cr towards miscellaneous receipts which needs to be checked prudently. As per regulation 8.30 & 8.40 of Transmission Tariff Regulation all these expenses are to be deducted in full from the ARR for the purpose of calculation of tariff of OPTCL.

8. **Annual Revenue Requirement:**

That the OPTCL has given the proposal for an annual revenue requirement of Rs. 1765.40 Crore for FY 2026-27 against Rs. 1331.02 Crore as approved by the Commission to be spent during FY 2025-26.

The summary of ARR of OPTCL for the last fifteen financial years is furnished below.

NOTARY PRATAP NARAYAN TIWARI NOTARY JHARSUGUDA REGD. No. OH 01113 GOVT. OF ODISHA

Financial Year	Proposed	Approved
2011-12	1435.88	579.34
2012-13	1348.46	612.53
2013-14	874.74	597.87
2014-15	988.8	641.3
2015-16	1008.36	630.94
2016-17	975	623.25
2017-18	1013.63	639.4
2018-19	990.65	659.95
2019-20	861.27	706.71
2020-21	966.44	713.84
2021-22	1307.17	792.93
2022-23	1247.14	831.95
2023-24	1102	896.18
2024-25	1380.69	913.7
2025-26	1663.33	1331.02
2026-27	1765.40	

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Hence the Annual Revenue Requirement of OPTCL for FY 2026-27 may be approved accordingly through a prudence check and based on the submission made above by the Respondent.

9. Determination of Transmission Charges

OPTCL has given the proposal for transmission charges @ **35.61 P/U** for FY 2026-27 against 25.5 P/Unit as approved by the Commission during FY 2025-26. The proposed Transmission Tariff of **35.61 P/U** is very high and should not be permitted. This will adversely affect the RST of the DISCOMS and will be a huge burden on the consumers of Odisha. Therefore, it is respectfully submitted that the Transmission charges levied by OPTCL should be substantially reduced to provide relief to the EHT consumers.

10. The proposal by OPTCL to disallow the rebate on prompt payment for Open Access customers, particularly Long & Medium-Term Open Access customers, needs to be carefully reviewed in the context of its impact on customer relations, operational efficiency, and regulatory guidelines.

While OPTCL has cited that there is no provision for rebate for early payment in the Open Access Regulations of 2020, the previous practice of offering a 2% rebate for payments made within two days was beneficial in encouraging timely payments and improving the cash flow for OPTCL. Discontinuing this rebate may have adverse effects on the payment behavior of Open Access customers, leading to potential delays in payment and reduced financial liquidity for OPTCL.

It is also essential to consider the implications of such a move on the competitiveness and attractiveness of Odisha's transmission system to potential Open Access customers. Providing financial incentives, such as the prompt payment rebate, could serve as a mechanism to retain customers and ensure a smoother cash flow for OPTCL. Additionally, a shift in policy might need to be discussed and approved by the Commission to ensure it aligns with the broader regulatory framework and customer service goals. In light of these factors, it is proposed that OPTCL may reconsider the discontinuation of the rebate, or alternatively, propose a revised rebate structure that balances the financial interests of both OPTCL and its Open Access customers. The Commission's input and further deliberation on the matter may be necessary to ensure that the policy is fair, transparent, and in the best interest of all stakeholders.

11. The Open Access Regulations, 2020 treat the DISCOMs and other Open Access users like CGP, and Industrial Consumers on the same footing. However, exceptions is being carved out, wherein the DISCOMs need not submit their contracted quantity and are allowed to pay Transmission Charges on the actual energy transacted, whereas the other

OA customers like CGPs, Industries are being forced to pay the Transmission Charges on the Contracted Quantity. Further, OPTCL has proposed to do away with the prompt payment rebate for OA customers like CGPs and Industries while allowing the prompt payment rebate benefit to DISCOMs. This type of differential treatment is against the Open Access Regulation, Grid Code, and statutory provision under the Electricity Act 2003. Therefore, it is requested that the Commission to treat all the Transmission Users i.e. CGPs, Industries, and DISCOM on the same footing with provision for charges, and rebates on the same principle without any discrimination.

12. Transmission Loss:

OPTCL has proposed transmission loss at 3.05%. In conformity with the power sector reform, OPTCL needs to reduce the transmission loss significantly. We propose to approve transmission loss of OPTCL at 2.5%.

That OPTCL has not yet identified the areas where loss is maximum and OPTCL needs to formulate action plans for loss reduction. OPTCL should inform the methodology adopted to estimate the transmission loss for every year. OPTCL should have undertaken energy audits of lines and substations to know the quantum of transmission loss in the system. Proposing the transmission loss arbitrarily without giving the breakup of the losses in different components of transmission system i.e., lines, substations, power transformers and auto transformers etc are not appropriate for the S.T.U. Thus proposing loss as per the business plan is meaningless. There is enough measure by which OPTCL could reduce the Transmission loss. OPTCL should conduct energy audits and their standard performance should be monitored by a third party auditor appointed by the Commission so as to assess the actual performance of the licensees.

It is prayed before the Hon'ble Commission may kindly re-calculate and approve transmission loss accordingly.

13. That earlier CGPs used to inject inadvertent power to the grid and GRIDCO availed the benefits of inadvertent power. GRIDCO also used to pay the hydro pool cost towards the inadvertent power. However, from FY 2019-20 onwards GRIDCO has stopped making payment towards inadvertent injections. Hence, OPTCL became the ultimate beneficiary of such injection of inadvertent power. We pray to the Hon'ble Commission to direct OPTCL to submit the detailed list of inadvertent injection for each month by each CGP and consider the same as an additional injection to the grid accordingly to calculate the transmission loss. The data of inadvertent injection is available with OPTCL and SLDC for each month for each CGP who are connected to EHT transmission system of OPTCL. The entire stakeholder and consumers of Odisha will be benefitted by such methodology as the intra-state transmission loss will reduce significantly.

14. Given the significance of maintaining transparency and accuracy in the transmission system's performance, it is requested that OPTCL conduct a Third-Party Energy Audit of its transmission loss. The energy audit should be carried out by an accredited energy auditor in line with the guidelines specified by the regulatory authorities.

The requirement to conduct an annual energy audit is crucial not only for assessing transmission losses but also for identifying potential inefficiencies and implementing corrective actions that can help in optimizing the system's overall performance. This audit will provide an independent, unbiased evaluation of the transmission system's energy losses and help in formulating strategies for loss reduction, which will ultimately contribute to improving the operational efficiency and financial health of OPTCL.

15. Open Access Charges:

Each year Hon'ble OERC informed OPTCL to submit 400 kV, 220 kV, 132 kV Power Transformer and EHT lines loading. OPTCL should make a practice to submit the Power flow data for 400 kV, 220 kV line and 132 kV line and its loading and the entire Auto-transformer loading, Power Transformer and ICT loading along with the ARR application. Moreover, by submitting only power transmitted on the peak demand day will not solve the purpose. In order to ascertain the margin availability, OPTCL may be directed to submit the maximum power handling capability, power flow and % loading of all the 400 kV, 220 kV, 132 kV line and Power Transformer, Auto Transformer, ICT Transformers. It is also desired that OPTCL should conduct load flow analysis to handle around 2000-3000 MW differential load in appropriate manner.

Once these data are made available, it can be ascertained that, there are sufficient margin is available in the transmission network and in order to utilize it fully, STOA should be promoted and the charges for the same may be kept at 1/4 of the MTOA and LTOA charges and necessary amendments in the regulations may be made.

16. Introduction of Reactive Energy Charges:

OPTCL has proposed to introduce Reactive Energy Charges of 3 Paise / kVARh which is very high and should be reduced in consultation with various stakeholders.

17. Levy of Grid Support Charge for connectivity:

OPTCL has submitted an application to the Hon'ble OERC on 26.06.2024, to determine and approve the imposition of Grid Support Charges for industries with Captive Generating/Cogeneration plants that operate alongside the OPTCL grids.

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The case was registered as OERC Case No.-44/2024. In an order dated July 6, 2023, the High Court suggested that if OPTCL wishes to pursue the imposition of Grid Support Charges, they should file a separate application with the OERC. The court emphasized that the OERC, under Section 181 of the Electricity Act, should examine the justifiability of such charges. Hon'ble Commission in order dated 09.07.2024 in case no 44 of 2024 has directed OPTCL to submit a consolidated report considering certain queries. OPTCL has submitted the report on 29.01.2025.

18. It is prayed before the Hon'ble Commission that the levy of Grid Support Charges (GSC) on Captive Generating Plants (CGPs) be abandoned. CGPs are operated by industries that already have a contract demand with the respective DISCOMs, which means they are contributing to the grid through their contracted capacities. The imposition of GSC on CGPs would lead to a scenario where industries are effectively being charged twice for grid support – once through their contract demand with DISCOMs and again via the proposed GSC.

This double charging would result in an unfair financial burden on industries that are already supporting the grid by paying for their contractual obligations. Such a practice could discourage further industrial investments in renewable energy projects, which is counterproductive to the state's objectives of promoting sustainability and industrial growth. Therefore, in the interest of fairness and to avoid unnecessary financial strain on industries, OPTCL should abandon the proposal to levy GSC on CGPs. This would ensure that industries are not unfairly penalized for their contribution to the grid, while also promoting the continued growth of renewable energy in Odisha.

19. It is proposed that OPTCL should proactively prepare and maintain a monthly status report outlining the available transmission lines, substation details, bay availability, and transformer capacity. This would enable prospective developers to assess the existing infrastructure and apply for an NOC for grid connectivity before submitting their applications to the RE nodal agency. By making this information accessible, OPTCL can streamline the process for developers, allowing them to submit their grid connectivity applications with more certainty.

Under the current practice, OPTCL does not conduct a prepaid system study unless the project has received approval from a nodal agency. However, it is recommended that OPTCL issue the NOC for grid connectivity based on the available infrastructure information, without requiring a prepaid system study at this early stage. The detailed prepaid system study can be conducted later, once the project has been approved by the relevant nodal agency. This approach would help accelerate the approval process and ensure timely facilitation of renewable energy projects in Odisha, while ensuring that the system remains aligned with the capacity of existing transmission infrastructure.

20. OPTCL may be directed to submit the current status of the 765 kV transmission network plan, specifically for the two 765 kV ISTS lines: Angul to Gopalpur and Angul to Paradeep, as well as the status of the 765 kV substation in the Kolabira area. In addition, OPTCL should provide detailed updates on the progress of transmission projects such as the Paradeep-Mahakalapada 765 kV line, the 400 kV substations at Joda, Ersama (Paradeep), and Neulapoi.

Furthermore, OPTCL should inform the Commission about the likely transmission and capacity charges for these projects, ensuring that they are transparent and justifiable. These charges should be subject to a prudence check by the Hon'ble OERC to assess whether they adequately serve the interests of consumers and the state. In cases where the charges do not align with the best interests of the consumers and the state, the Commission may not approve the proposed capital expenditure plan and tendering process. In such instances, OPTCL should be instructed to initiate a fresh tendering process under the Intra-State Transmission Plan to ensure that the most optimal and cost-effective solutions are selected.

21. Transmission business being a capital intensive projects requires long term planning. Therefore, Hon'ble OERC may direct OPTCL to submit MYT tariff and long term Business Plan based on which Investment Plan should be provided.

22. That Intrastate transmission system should be developed in a coordinated manner in consultation with CTU, State govt., Generating companies, Regional Power Committees, CEA & licensees. However such grid coordination meetings are not happening regularly. It is proposed that the grid coordination committee meeting may be conducted regularly. Nos of industries are facing lots of difficulties in getting grid connectivity and enhancement of contract demand. Even the Hon'ble OERC has directed to hold a meeting of OPTCL with DISCOM on a monthly basis to ensure smooth operation of the power sector and MOM to be furnished to OERC. The Hon'ble OERC in its earlier transmission tariff order dated 13.02. 2024 in case no. 113/2023 has directed to submit the revised 14th inter-state transmission plan of OPTCL for approval. OPTCL may kindly submit the status of the 14th inter-state transmission plan of OPTCL and stage wise implementation plan.

23. The Hon'ble OERC has published the OERC (Development of Intra-State Transmission Projects through Tariff Based Competitive Bidding in the State of Odisha) Order, 2022. OPTCL may be directed to submit an action taken report towards execution of new transmission projects. The Hon'ble OERC has earlier directed OPTCL to standardized the transmission line tower, multi-circuit tower etc. the Hon'ble OERC may pass appropriate order.

24. Further, it is proposed that OPTCL should set up an independent testing lab accredited by NABL for testing relays, meters, transformer oils so that such facilities can be availed by industries.

25. It is noted that OPTCL has claimed ₹0.35 Cr towards annual Grid Coordination Committee (GCC) expenses. However, the respondent seeks clarification from OPTCL regarding the number of GCC meetings conducted during FY 2023-24, FY 2024-25 and FY 2025-26. Additionally, OPTCL should provide details of the outcomes from each GCC meeting or make this information publicly available on its website for transparency and accountability.

The respondent further understands that, as per the provisions of Chapter 11, Clause 2 (2) of the Odisha Grid Code Regulation, 2015, there appears to be a lack of GCC meetings being held in the prescribed manner. It is crucial that the objectives of the GCC, which are to ensure efficient coordination between transmission, distribution, and generation entities, are met as per regulatory requirements. Therefore, OPTCL should clarify the status of GCC meetings, as well as any actions taken to address this issue, ensuring compliance with the Grid Code and the effective functioning of the transmission and distribution system in Odisha.

26. It is proposed that OPTCL should conduct a feasibility study to assess the potential of converting the existing 26 numbers of 132 kV switching stations into 132/33 kV substations. This conversion would involve establishing additional bays and installing 132/33 kV transformers, thereby enhancing the capacity to accommodate the future load requirements of DISCOMs. The proposed upgrade would not only cater to the increasing demand from existing consumers but also provide a critical infrastructure platform for connecting future renewable energy (RE) projects, particularly solar power plants, into the grid. This conversion aligns with the growing need for decentralized and renewable energy sources, which are integral to meeting the State's sustainability and decarbonisation goals. By expanding the grid infrastructure, OPTCL can ensure that the transmission network is future-proofed to handle an influx of renewable energy, which is expected to play a key role in Odisha's energy transition. Moreover, this initiative will reduce the load on existing substations and improve the overall grid stability, enabling efficient power distribution across the state. Therefore, a comprehensive feasibility study by OPTCL will allow for a detailed assessment of technical, economic, and environmental implications, thereby ensuring that the infrastructure investments are both optimal and sustainable in the long term.

27. OPTCL should make a standard practice to prepare its ARR application and insert these regular features during the ARR application stage considering all relevant query of

Hon'ble OERC. This will be quite helpful for the Respondents as well as for the officials of Hon'ble OERC for conducting proper analysis and scrutiny.

28. The Commission should direct OPTCL to engage with the Government of Odisha to secure funding for economically unviable projects and other critical infrastructure developments that serve the larger interest of the State. Many transmission projects, though essential for grid reliability, regional development, and equitable power access, may not be financially viable solely through tariff-based funding. Government grants can bridge this gap, ensuring that crucial transmission infrastructure is developed without placing an excessive financial burden on consumers. Additionally, state-funded support for such projects would facilitate balanced regional growth, promote industrialization in remote areas, and enhance overall energy security. A coordinated approach between OPTCL and the Government will help in prioritizing strategic projects, optimizing resource allocation, and accelerating execution timelines. Therefore, securing grants for these projects is imperative to ensure a robust and resilient transmission network that supports Odisha's long-term energy and economic goals.

29. The Commission may direct OPTCL to continuously monitor the transmission system's operation and take proactive measures to prevent overloading or under loading which is essential for ensuring an efficient and reliable power network. Overloading can lead to equipment failures, increased technical losses, and reduced system lifespan, while under loading results in inefficient asset utilization and financial strain. By adopting innovative strategies such as dynamic load management, network reconfiguration, real-time data analytics, and grid optimization techniques, OPTCL can achieve optimal loading of the existing infrastructure. This will not only help in reducing transmission losses but also enhance grid stability and improve overall system efficiency. Additionally, leveraging advanced technologies like AI-driven predictive maintenance, demand forecasting, and adaptive grid control will enable a more resilient and cost-effective transmission network. Therefore, continuous monitoring and proactive intervention are necessary to maximize the operational efficiency of the transmission system, ensuring sustainable and economical power transmission for all stakeholders.

30. The Commission's earlier directive for coordinated development of the intra-state transmission network, ISTS, and downstream distribution infrastructure is crucial to ensure optimal asset utilization, financial prudence, and grid stability. Many substations under OPTCL remain under loaded due to the absence of necessary downstream infrastructure from DISCOMs, leading to stranded assets and inefficient capital deployment. To avoid such inefficiencies, it is essential that OPTCL, DISCOMs, and CTU synchronize their planning and execution timelines. This will prevent unnecessary transmission investments that burden consumers with higher tariffs without delivering corresponding benefits. Moreover, ensuring that transmission system strengthening projects align with actual load

growth will reduce the risk of power evacuation bottlenecks, voltage fluctuations, and increased transmission losses. A structured, joint planning approach will enhance grid reliability, improve network efficiency, and protect consumer interests. Therefore, the Commission's directive to mandate discussions among stakeholders before execution is a necessary step to ensure a well-integrated, cost-effective, and sustainable power transmission system.

31. Therefore, Transmission system upgrades should be strategically planned rather than implemented in an ad-hoc manner. The Commission should direct that no transmission system strengthening proposals should be executed without the prior approval of the Commission. Strengthening measures should be backed by technical and economic justifications, as required by OPTCL's license conditions and tariff regulations. Transmission projects involve significant capital investments that ultimately impact consumer tariffs. Prior Commission approval ensures that OPTCL implements only necessary and cost-efficient projects. Avoids excessive capital expenditure, which could lead to unjustified tariff hikes for consumers. Aligns investments with the approved capital expenditure (CAPEX) plans under the tariff regulations.

32. OPTCL should be directed to consider the meter data to assess the month-wise transmission loss in intra-state transmission systems including losses at different voltage levels (i.e. 132 kV, 220 kV and 400 kV levels).

33. The power utility has proactively implemented multiple loss reduction strategies, including system automation, load bifurcation, and digitization of the grid. Despite these extensive efforts, the anticipated loss reduction has not been realized, proving that systemic challenges persist beyond mere technical upgrades. Load bifurcation improves local reliability, but its impact on overall transmission loss is minimal, as power still needs to travel long distances from generation to consumption points. The introduction of ring systems instead of radial networks has increased network stability and redundancy, but transmission losses are still governed by physical distance and resistance of the conductors. Advanced transformers and low-loss conductors have been introduced, yet their impact on overall losses will be realized only after complete replacement of old equipment across the entire network. Bay control units (BCUs) and digital substations provide enhanced monitoring and real-time control over power flow, reducing inefficiencies. However, these tools primarily assist in identifying losses rather than eliminating them outright. Their full impact will be seen once corrective actions are consistently implemented over a longer duration.

34. It is proposed that Cyclone resilient robust electricity transmission and distribution infrastructure in coastal areas should be established by OPTCL. OPTCL may be directed to submit a report on how many mobile substations are available with them to meet the contingency situation during cyclone and their cyclone mitigation plan which has been

earlier directed by Hon'ble OERC. OPTCL has not taken action for the design of multi-circuit and multi voltage transmission lines.

35. We request the Hon'ble Commission to kindly allow the Respondent to submit any additional submissions, memos, documents etc. as may be required and in general do all such things as may be required in connection with the above reply.

PRAYER

In the facts and circumstances stated above and in the interest of the parties and the larger interest of the State the Hon'ble Commission be pleased to pass appropriate orders to the effect that

1. ARR of OPTCL may be approved accordingly based on the submission made above.
2. The Transmission Charges should be reviewed and reduced substantially.
3. Transmission loss to be reduced considering the submission made for FY 2026-27.
4. Proposal of Reactive energy charges of 3 paise/KVARh should be rejected.
5. Proposal of OPTCL to levy of Grid Support Charge for connectivity may be rejected.
6. Each year truing up exercise and business plan approval should be carried out by Hon'ble commission through a process of public hearing.

Place: Bhubaneswar

Date: 13.01.2026

For M/s. Bhushan Power and Steel Limited

Authorized Signatory

PRATAP NARAYAN TIWARI
NOTARY, JHARSUGUDA
REGD. NO. ON-01/13
MOB. No.- 9437345380

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur
Bhubaneswar-751021

Case No: 121/2025
Filing No: 1

IN THE MATTER OF:

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022

... Applicant

AND

M/s. Bhushan Power and Steel Limited, having manufacturing unit at P.O-Lapanga, P.S-Thelkoloi, Teh-Rengali, Sambalpur, Odisha-768212, Email: rakesh.pujari@jsw.in

...Respondent

Affidavit verifying the application

I, Mr. Rakesh Kumar Pujari aged about 54 years, working as GM-Legal of M/s. Bhushan Power and Steel Limited having manufacturing unit at P.O-Lapanga, P.S- Thelkoloi, Teh-Rengali, Sambalpur, Odisha-768212 do hereby solemnly affirm and state as follows: -

1. That I am working as GM-Legal at M/s. Bhushan Power and Steel Limited and I am duly authorized to swear this affidavit on its behalf.
2. The statements made herein now are based on information and I believe them to be true.

PLACE: Bhubaneswar
DATE: 13.01.2026

DEPONENT

BHUSHAN POWER & STEEL LTD.

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur
Bhubaneswar-751021

Case No: 121/2025
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IN THE MATTER OF:

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AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022

... Applicant

AND

M/s. Bhushan Power and Steel Limited, having manufacturing unit at P.O-Lapanga, P.S-Thelkoloi, Teh-Rengali, Sambalpur, Odisha-768212, Email: rakesh.pujari@jsw.in

...Respondent

Letter of Authorization

I, Mr. Rakesh Kumar Pujari, S/o Binaya Kumar Pujari, aged 54 years is the authorized signatory of M/s. Bhushan Power and Steel Limited hereby authorize Sri Bibhu Swain residing at K-8-82, Kalinga Nagar, Ghatikia, Bhubaneswar-751029, Email: pwrtch@gmail.com, Phone-9437155337 to be my representative to present the above case on my behalf before the Hon'ble Odisha Electricity Regulatory Commission relating to my above objection and to submit any additional objection, memos, documents etc. as may be required and in general do all such thing as may be required in connection with the above objection.

Place: Bhubaneswar

For M/s. Bhushan Power and Steel Limited

Date: 13.01.2026

Authorized Signatory

NOTARY
PRATAP NARAYAN TIWARI
NOTARY
JHARSUGUDA
REGD. No.
ON 2013
GOVT. OF ODISHA

BHUSHAN POWER & STEEL LTD.

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
PLOT NO. 4, SAILESHREE VIHAR,
CHANDRASEKHARPUR, BHUBANESWAR-751021

CASE NO. 121/2025
FILING NO. 3

IN THE MATTER OF: (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

And

(ii) Truing up application for the FY 2024-25 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

AND
IN THE MATTER OF: Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

..... Applicant

vrs

M/s. Bhushan Power and Steel Limited, P.O- Lapanga, PS- Telkoloi, The- Rengali, Sambalpur, Odisha-768212 and **16 others.**

..... Objectors

Rejoinder to the objections raised by the Objector M/s. Bhushan Power and Steel Limited.

The humble applicant above named

MOST RESPECTFULLY SHEWETH:

1. That the Objector M/s. Bhushan Power and Steel Limited vide affidavit dated 16.01.2026 has raised certain submissions on ARR & Transmission Tariff Application

of OPTCL for FY 2026-27 and Truing up application for FY 2024-25. In reply, OPTCL submits its rejoinder to the submissions in the following paragraphs.

Rejoinder to Para 3 to 8:

The respondent has submitted statistical data of the previous years comparing the proposed vis-à-vis approved in respect of expenses towards human resource expenses, R&M expenses, A&G expenses, depreciation and RoE with a request to approve accordingly after due scrutiny. In this regard, it is pertinent to mention that OPTCL has submitted its ARR application for FY 2026-27 as per the various provisions stipulated in OERC (Terms & Conditions for Determination of Transmission Tariff) Regulations, 2014 and directions of the Commission passed in different orders with proper justifications.

Further, details of Sanctioned strength vis-a-vis actual man in position is furnished below:

Manpower position as on 20.01.2026			
Category	**Sanctioned Strength**	**MIP**	**%**
Executive	2040	1400	68.63%
Non-Executive	3862	1342	34.75%
Total	**5902**	**2742**	**46.46%**

Rejoinder to Para 9:

Determination of Transmission Charges:

The Transmission infrastructures are created considering the demand and request of the DISCOMs / Industries from time to time, after due approval form the Hon'ble OERC through Transmission Plan. Being a Deemed Transmission License, OPTCL has always endeavored to create the Transmission infrastructure for providing reliable and quality power to the consumers of DISCOMs. Accordingly, every year OPTCL is adding more transmission assets to meet the requirement of DISCOMs. Transmission Charge is arrived at 35.61 paise per unit by dividing the total ARR of OPTCL with the recent realistic MU projections of DISCOMs and recovered from them on a monthly basis. This rate will decrease if DISCOMs drawal increases. In fact, OPTCL has consistently advocated for the recovery of transmission charges based on contracted capacity, in line with the practice followed by STUs in other states.

The proposed Transmission Charge of 35.61 p/u has been derived by considering the recent realistic energy demand projections of 41,849.28 MU as

Naga Cotton Bank

communicated by the DISCOMs & other LTOA customers and the ARR figures have been arrived by OPTCL justifying component wise projections as per the provisions contained in OERC Transmission Tariff Regulations, 2014, OPTCL's Audited Accounts for FY 2024-25, all relevant data/information and materials. The details of projections are submitted in page 30 of the present ARR application of OPTCL for FY 2026-27. Moreover, OPTCL had furnished all requisite information and details as per the prescribed formats of the Hon'ble Commission with full justifications.

Hence, mere apprehension of the respondent towards imposition of excessive burden on Discoms seems to be inappropriate and unacceptable which is likely to be rejected at this juncture. Moreover, the contention of the stake holder operating in the value chain of electricity needs to appreciate the fact that the cost recovery has to be in full so as to make the sector sustainable.

Rejoinder to Para 10 & 11:

The Hon'ble Commission vide letter no. DIR (T)-332/2008/77 dated 01.02.2021 has clarified that the DISCOMs do not come under the new regulation "OERC (Terms and conditions of Intra state open access) Regulations 2020" and they are governed under OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014. A copy of the said letter is provided as **Annexure-01.** Further, the details of provision of Rebate have been meticulously mentioned in page no: 59 of our ARR application for FY 2026-27 as per the said OERC Regulations.

Rejoinder to Para 12-14:

Transmission Loss

The argument for transmission loss of OPTCL at 2.5% is without any justification. The actual transmission loss for the period **Apr' - Sep' 2025** is calculated to be **3.07%** as shown in the ARR & TT application for FY 2026-27 (page-205). This figure is **less than the actual** transmission loss during last year **i.e. 3.09%** for **FY 2024-25.** In fact, OPTCL had projected a Transmission loss of 3.05% for FY 2025-26, but Hon'ble Commission had set a target of 3.00% which could not be achieved yet.

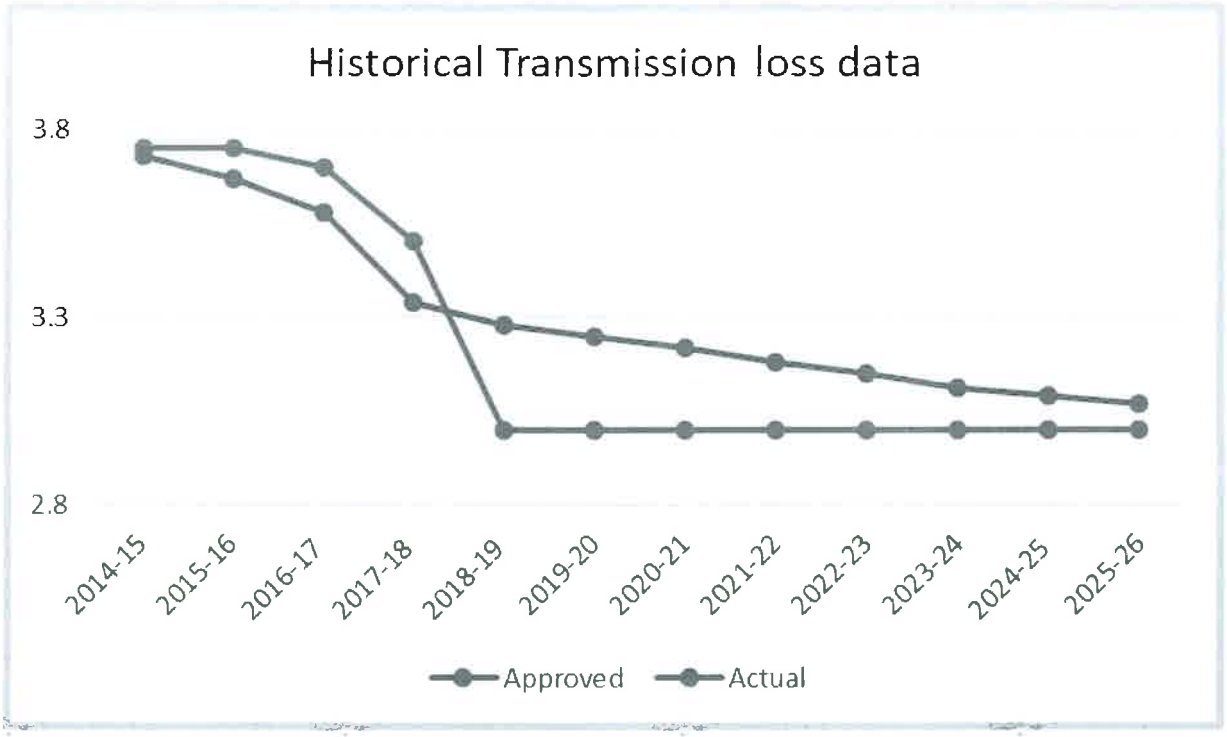
In OPTCL system, the transmission loss is purely technical loss and a function of real time injection of power by a number of generators, system configuration and power flow requirements at different load centers. It depends on many parameters / factors such as distance and mismatch between generation and load centers, types of load, reactive power compensation, voltage profile, seasonal variation of demand load etc. Thus, OPTCL does not have much control over the same at any point of time. The transmission system of OPTCL operates as an integral part of the Eastern Region

Grid to serve the internal demand of the State as well as to carry out import and export of power depending upon the system demand.

As a matter of fact, some grid s/s and lines are being constructed in many remote and deprived areas funded under Central & State Govt. schemes in the interest of public. Additional length in EHT lines and Sub-stations in under-loaded areas are also responsible for increase in transmission loss.

Transmission Loss in OPTCL network is in a gradually reducing trend over the years i.e. from 3.73% during 2014-15 to 3.09% in 2024-25 and has remained 3.07% within 1st six months of FY 2025-26 mainly due to addition of infrastructure and various system strengthening works taken up by OPTCL. The actual losses incurred over the years by OPTCL have been within the margin allowed by Hon'ble Commission up to the year FY 2017-18. However in FY 2018-19, the commission set the loss at 3.00% though the projected transmission loss was at 3.25% and thereafter the commission has been pegging the transmission loss at the same level though loss projected by OPTCL remained in a downward trend.

Year	Tr. Loss proposed	OERC Approval	Actual
2014-15	3.75%	3.75%	3.73%
2015-16	3.75%	3.75%	3.67%
2016-17	3.70%	3.70%	3.58%
2017-18	3.50%	3.50%	3.34%
2018-19	3.25%	3.00%	3.28%
2019-20	3.25%	3.00%	3.25%
2020-21	3.20 %	3.00%	3.22%
2021-22	3.15%	3.00%	3.18%
2022-23	3.10%	3.00%	3.15%
2023-24	3.10%	3.00%	3.11%
2024-25	3.05%	3.00%	3.09%
2025-26	3.05%	3.00%	3.07% (1st six months)



From the table given above, it is also clear that each year upto FY 2017-18, the transmission loss achieved by OPTCL has remained at a level lower than the approved figures by Hon'ble commission and from FY 2018-19 the target set by Hon'ble OERC appears to be very stiff which was hard to achieve though the trend of lesser transmission loss year after year has been achieved.

It may kindly be appreciated that transmission (technical) losses are inevitable in power systems due to the fundamental laws of physics and become increasingly difficult to reduce beyond a certain threshold. Further, at the all-India level, transmission losses across different regions have consistently remained above 3.12%. To substantiate our viewpoint, the transmission loss data for various regions is presented below for the kind consideration of the Hon'ble Commission.

Transmission loss of Different Regions for FY 2023-24

Region	Transmission loss
Northern Region	3.15%
Western Region	3.12%
Southern Region	3.46%
Eastern Region	**4.24% (Odisha- 3.11%)**
North Eastern Region	3.89%

(Courtesy: General Review 2025, Government of India, Ministry of Power, CEA attached as **Annexure-02**)

It may be observed that OPTCL's transmission loss of 3.07% is lower than the average transmission losses of all regions.

However, as a responsible Transmission utility, OPTCL is making an all-out effort to reduce the transmission loss further by undertaking various **system operation and loss reduction measures** by implementing the emerging technologies like **system Automation**, load bifurcation, **modification in system configuration**, procurement of more efficient equipment, **Digitalization of grids** by using SAS, Protection system improvement using Busbar protection and Event Logger, Advanced Metering Infrastructure**, Conversion of Radial to Ring system,** construction of GSS at **higher voltage levels** (220kV & 400kV), Replacement of old conductors and Transformers etc. to bring it to **3.05% by FY 2026-27.**

Steps taken for Energy Audit

Under the PSDF funding, SLDC is implementing the SAMAST project. After operational of SAMAST project, detailed energy auditing is possible.

Regarding inadvertent power

CGPs are not firm sources of power as they are essentially meant for the captive consumption .OPTCL does not agree to the assumption of the respondent that around 985MU of inadvertent power will be injected into the OPTCL system in a year considering the CGP capacity 9850MW. From the Pool Cost data provided by GRIDCO for the first six months of FY 2025-26, it is observed that the total inadvertent power injection is 230.643MU which has been already considered while calculating the Transmission loss of 3.07% in form T-6. Hence, Transmission loss as suggested by the Objector is not just and proper. Details of inadvertent power injected by CGPs in FY 2025-26 till September is furnished as under:

Month	Quantum of inadvertent power (MU)
April-25	38.31
May-25	38.79
Jun-25	39.97
Jul-25	30.39
Aug-25	43.27
Sep-25	39.92
Total	**230.64**

Further, it is submitted that Transmission charge is being computed on Open access transactions based on scheduled energy. Hence, OPTCL does not reap any benefit out of inadvertent power.

Rejoinder to Para 15:

Open Access Charges:

The system peak demand of **7069.89 MW** was touched on 12.08.2025 at 24:00 Hr. Statement on the loading pattern of the existing transmission system (400kV, 220kV & 132kV EHT lines along with loading on ICT, Auto & power transformers) corresponding to the peak demand is submitted in compliance to the OERC queries on ARR application of OPTCL for FY 2026-27 which will submitted to your good self along with this reply. OPTCL has already conducted load flow study considering different load scenarios i.e. Summer peak, Winter lean, High hydro, Low Hydro & Solar Peak in the Revised 14th Intra-state Transmission Plan of Odisha for FY 2022-23 to FY 2026-27, which has been duly approved by Hon'ble Commission vide case no. 08/2024. In the said report, percentage loading of all Transmission lines, ICTs, Auto & Power Transformers till FY 2026-27 have been mentioned. The Transmission infrastructures are being created considering the demand and requests of the DISCOMs/Industries from time to time after due approval form the Hon'ble OERC through Transmission Plan. DISCOMs and other LTA customers are responsible to bear the full approved ARR of OPTCL. STOA charge is being charged as per the Open Access Regulations, 2020.

Further, the revenue earned from STOA transactions is accounted for under Miscellaneous Income and is ultimately deducted from the Gross ARR to arrive at the net recoverable transmission charges to be recovered from consumers, including DISCOMs. Therefore, application of the 1/4th concept would result in an additional burden on domestic consumers. Further, as CERC regulations, the STOA rate is comparatively higher than LTA.

It is pertinent to mention that LTA consumers enjoy the first right and greater benefits compared to MTOA and STOA consumers. Therefore, for industries seeking a reliable, quality, and uninterrupted power supply, availing Long-Term Access (LTA) remains one of the most suitable options.

Rejoinder to Para 16:

Reactive Energy Charges:

As per Regulation 31(1) under Chapter-7 (IMBALANCE AND REACTIVE ENERGY CHARGES) of the OERC (Terms and Conditions of Intra-State Open Access) Regulations, 2020, payment for the reactive energy charges by open access consumers shall be in accordance with provisions stipulated in the State Grid Code or as may be specified in relevant regulations/orders of the Hon'ble Commission .

The Hon'ble Commission in Para 16 (page 5) of the order dated 05.02.2019 in Case No. 50/2017 has inter alia viewed that the provisional reactive energy charges of 3 paise/KVArH as allowed in the ARR order of OPTCL for FY 2018-19 continue for time being till a final justification is submitted by OPTCL in consultation with the stakeholders. However, despite raising reactive energy bills by SLDC since the beginning of FY 2025–26, no amount has been received in the Reactive pool account against Reactive Energy Charges to date due to non-payment by DISCOMs and other LTOA customers.

In view of the above, OPTCL proposes that 3paise/KVARh may be approved provisionally as Reactive Energy Charges for FY 2026-27.

Hence, the proposal of the objector to reduce the reactive energy charges as suggested by OPTCL is not just and proper.

Rejoinder to Para 17 & 18:

Levy of Grid Support Charge for connectivity:

The benefits derived by the CGPs with co-located loads are enormous. The benefits are in the nature of ancillary services which are not paid till now. The Grid support charges (GSC)/Parallel operation charge has been levied by different state Regulatory Commissions and upheld by APTEL and Supreme Court of India through various orders and hence proposed by OPTCL through a separate petition. OPTCL had filed an application (case No. 44 of 2024) on 26.06.2024 for determination and approval for levy of Grid Support Charges for industries having Captive Generating / Cogeneration plants and running in parallel with the Grids of OPTCL. Hon'ble Commission vide its order in case no. 44/2024 directed OPTCL to submit a consolidated report considering the observations/queries raised by the stakeholders in the earlier Cases filed by OPTCL. In compliance to above, OPTCL has filed the requisite report before Hon'ble Commission on 29.01.2025.

Further, it is submitted that a consumer connected to OPTCL network, pays demand charges for the contracted demand to concerned DISCOMs[. The rationale

behind this arrangement is that the corresponding quantum of transmission corridor capacity is reserved for the respective consumer, and only the remaining available capacity in the EHT network is allocated to other consumers. Moreover, it is observed that installed capacity of CGPs are much more than the contracted demand with DISCOMs.

However, it is observed that after synchronization with the grid, CGPs adversely impact grid quality through the injection of harmonics and other disturbances. To address such impacts and ensure grid stability, appropriate charges, namely Grid Support Charges, are required to be levied.

Further, it is submitted that OPTCL has proposed grid support charge factoring the contracted demand signed with DISCOMs by CGPs. So, double charging issue raised by the objector does not arise.

Rejoinder to Para 19:

Necessary system studies are invariably conducted and approvals are granted to RE developers applying for power injection or drawal following the completion of technical and field feasibility assessments.

Further, IT wing of OPTCL has developed a web portal i.e. ***Odisha Grid Insights*** **(OGrI)** portal to publish the key information related to OPTCL EHT Network. This portal will be updated on a monthly basis and will include the following details:

2. Geo-coordinates of all line assets under OPTCL.
3. Present loading data (Minimum & Maximum).
4. Projected load demand within the next 6 months.
5. Transformation capacity.
6. Network status, which will include:
   a. Spare feeders (equipped or not-equipped)
   b. Space available for feeder bays
   c. Possible take-off arrangements (by cable or by overhead)
   d. Evacuation facilities (radial mode or interconnected mode)
   e. Load category (percentage of industrial load vs. domestic load)

The portal is currently operational with most of the above information. The portal can be accessed at the following URL: **https://ogri.optcl.co.in**. This initiative will help RE developers to access the OPTCL network for finding potential injection points.

Rejoinder to Para 20:

Status of key Transmission projects is furnished below:
Project under ISTS

1. **765kV Angul – Gopalpur**
   a. Scheduled date of completion – December 2027.
   b. CERC yet to issue Transmission license to the L1 bidder under TBCB.
2. **765kV Angul – Paradeep**
   a. Scheduled date of completion – November 2026.
   b. CERC yet to issue Transmission license to the L1 bidder under TBCB.

Projects under OPTCL

1. **765kV Kolabira**
   - Approved under 21st CMETS-ER dated 22.08.2023
   - Land identification is in progress
2. **400kV Joda/Barbil (Basudevpur)**
   - Approved under 33rd CMETS-ER dated 05.08.2024
   - Land identification is in progress
   - Project will be executed by OPTCL upon finalisation of funding from Govt. and IP approval from Hon'ble Commission.
3. **400kV Ersama**
   - Scheduled date of completion – June 2026
4. **400kV Neulapoi**
   - Approved under 30th CMETS-ER dated 14.05.2024
   - Tender floated, work started

There is no provision of Capacity charges in the extant OERC Transmission Tariff Regulations, 2014. Since Gridco is procuring power through ISTS network, the transmission charges thereof is dealt by Gridco.

Rejoinder to Para 21:

It is intimated that the Business Plan of OPTCL for the 3rd Control Period, i.e., from FY 2024–25 to FY 2026–27, has been approved by the Hon'ble Commission vide Order dated 24.09.2025 in Case No. 20 of 2025.

Rejoinder to Para 22:

The Revised 14th Intra-State Transmission Plan of Odisha for FY 2022–23 to FY 2026–27 has been approved by the Hon'ble Commission vide Case No. 08/2024. Recently, the investment proposals for 37 projects were heard after inviting suggestions and objections from the general public.

Rejoinder to Para 23:

Initially construction of 400/220kV AIS S/S at Remuli along with associated lines was planned for TBCB . Subsequently, State Government after careful consideration have been decided to construct 400/220kV AIS S/S Remuli(at Basudevpur) and establishment of 2x160 MVA, 220kV GIS S/S at existing Barbil GSS along with associated 400kV & 220kV lines on cost plus method instead of TBCB mode. Accordingly, at present, there is no proposal for execution of any project under TBCB mode.

OPTCL has standardized technical specifications for transmission line towers/steel poles, power transformers, switchgear, surge arresters, CTs, PTs/CVTs, conductors, insulators, fire fighting systems, lighting systems, AC/DC systems, etc., and continues to incorporate improvements as identified for further refinement

Rejoinder to Para 24:

OPTCL maintains an in-house oil testing laboratory that serves as the central facility for analyzing oil breakdown voltage, dissolved gas analysis and PPM measurements. A relay testing laboratory is also planned. OPTCL will approach the Government of Odisha for funding to obtain National Accreditation Board for Testing and Calibration Laboratories (NABL) accreditation for both laboratories.

Rejoinder to Para 25:

No GCC meeting has been conducted in FY 2023-24 and 01 no. GCC meeting has been conducted in FY 2024-25. The details of recent GCC meeting conducted is furnished below:

GCC meeting	Date of meeting
17th GCC meeting	17.01.2025
18th GCC meeting	03.09.2025

OPTCL has already sought agenda items from various stakeholders for the 19th GCC meeting. Further, upon finalization of the agenda, the GCC meeting will be convened shortly. The amount proposed under GCC head will be utilised fully.

Rejoinder to Para 26:

OPTCL will take up the proposal of converting Switching Station to Substation based on the demand projection of DISCOMs and the proposal received by RE developers on a case to case basis with the approvals of Hon'ble Commission.

Rejoinder to Para 27:

The respondent's suggestion has been noted and OPTCL will include the details of loading pattern in the ARR filing of the coming years. Invariably, OPTCL has been sharing the details of loading pattern of all the ICTs, Auto & Power transformers in L-9 format (OERC approved format) as a part of ARR filing every year. Further, loading details corresponding to the maximum demand of **7069.89 MW** on 12.08.2025 has been provided in Compliance to the OERC queries on ARR application of OPTCL in case no. 121/2025.

Rejoinder to Para 28:

Since the creation of transmission infrastructure requires huge investments, OPTCL always requests the state Government for financial support. State Govt. has been contributing 100% financial assistance in the shape of grant/equity in case of non-remunerative and contributing 30% equity support in case of remunerative projects.

Rejoinder to Para 29:

To prevent overloading, regular system study has been carried out and augmented the network capacity as and when required. Priority has been given to use the under loaded network. As directed by Hon'ble Commission, regular meetings are being conducted with DISCOMs for creation and timely completion of downstream infrastructure for optimum utilization of transmission networks. New Transmission elements proposed by OPTCL to strengthen state evacuation are deliberated and approved in the CMETS-ER meeting, held on monthly basis which are further incorporated in National Transmission Network. At present, OPTCL is implementing the STAMS project, under which all network parameters will be monitored centrally. This will enable system operators to take prompt corrective actions, thereby enhancing grid stability and improving overall system efficiency. Further, OPTCL has planned for AI based inspection & maintenance of the Transmission lines and also planning for Asset Performance Management System with AI capabilities for predictive maintenance of its transmission assets.

Rejoinder to Para 30:

As per the provisions of Sections 39 and 40 of the Electricity Act, 2003, OPTCL, being the State Transmission Utility (STU), is responsible for the planning

and development of the transmission infrastructure in the State of Odisha. OPTCL obtains inputs from DISCOMs, industries, and generators, and thereafter prepares a comprehensive Intra-State Transmission Plan considering various loading conditions. All new transmission proposals are duly approved by the Hon'ble Commission through the Transmission Planning, Business Plan, and Investment Proposal approval process, wherein DISCOMs and the State Government are among the respondents.

Further, consultations are held with stakeholders through Transmission and Distribution Coordination Committee (TDCC) meetings, Grid Coordination Committee (GCC) meetings, and meetings at the Government level to ensure the optimal utilization of OPTCL's transmission system.

Rejoinder to Para 31:

OPTCL always executes its projects which are either approved in Business Plan of OPTCL or Intra State Transmission Plan. As per the license conditions, OPTCL is mandated to take prior approval of Hon'ble Commission for any transmission projects above Rs. 10 Cr. which OPTCL has been following scrupulously.

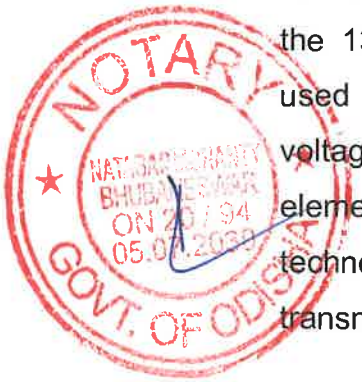
Rejoinder to Para 32:

Transmission loss in OPTCL is computed based on the Pool Cost data received from GRIDCO and the Energy Flow Statement issued by SLDC, both of which are prepared using data recorded by energy meters.

Rejoinder to Para 33:

Some of the innovative technologies adopted in OPTCL as under:

- OPTCL has successfully implemented digital substation technology at the 132/33 kV Agalpur–Rampur GSS, wherein fiber optic cables are used in place of conventional copper control cables to transmit current, voltage and control signals digitally. In this system, loss-causing copper elements are eliminated and replaced with fiber optics. Such incremental technological improvements collectively contribute to the reduction of transmission losses.



- Further, OPTCL is continuously replacing existing conductors in transmission lines, where thermal loading is approaching limits, with High Temperature Low Sag (HTLS) conductors, which have lower resistance compared to conventional ACSR conductors.

- On an experimental basis, OPTCL has installed a Fiber Optic Current Transformer (FOCT) at Chandaka GSS, thereby eliminating the need for conventional current transformers.

- Furthermore, OPTCL is augmenting age-old transformers with new, energy-efficient transformers, replacing old conductors with new ones, converting radial lines into ring mains, and upgrading single-circuit (S/C) lines to double-circuit (D/C) lines. All these measures collectively result in an overall reduction in transmission losses.

Rejoinder to Para 34:

The following outlines OPTCL's step-by-step Cyclone Mitigation Plan for Odisha's transmission & distribution network. It addresses Commission directives on adequate spares, Emergency Restoration System (ERS), mobile substations, and faster restoration following cyclones.

STEP-BY-STEP CYCLONE MITIGATION PLAN

Governance & Activation:

a) Overall command during a cyclone emergency rests with the Incident Commander, normally the CMD or Managing Director of OPTCL. Sr. General Manager of each zone control field operations, while the State Load Despatch Centre provides real-time grid coordination.

b) This command structure is activated the moment the India Meteorological Department (IMD) issues a cyclone watch or warning. A watch triggers a pre-impact alert; a warning of landfall within forty-eight hours or confirmed multi-tower failures escalates the plan to full mobilisation.

c) State Government bulletins and ground observations supplement the IMD alerts.

Pre-season Preparedness:

a) Every year between January and March, before the cyclone season begins, OPTCL updates a detailed coastal risk map covering a sixty-kilometre buffer from the shoreline. Priority circuits and substations are listed in the Power Atlas and circulated internally.

b) All two strategic depots—Mancheswar and Chatrapur—are audited to verify the availability of Emergency Restoration System (ERS) towers, spare transformers of various MVA ratings, extra-high-tension conductors, insulators,

diesel-generator sets and de-watering pumps. Inventory is replenished to maintain at least a 5% maintenance buffer.

c) During this period, right-of-way corridors are cleared and trees trimmed, short-span interpositions are inspected, and a full functional check is performed on SCADA, OPGW, VSAT and satellite-phone links. Round-the-clock control rooms are tested to ensure operational readiness.

Pre-impact Measures:

a) Once the IMD issues a watch or warning, the Incident Commander issues a formal mobilisation order. This specifies the ERS kits, cranes, truck-mounted 33 kV mobile substations, spare transformers and diesel generators required for each corridor, along with designated staging points.

b) Crews, equipment and at least one ERS kit per priority corridor are moved to pre-cleared rally points, with police and forest permits already in place. Rate-contract gangs are activated.

c) Where necessary, the grid is reconfigured or islanded in advance to reduce cascade risk and to preserve supply to critical facilities such as hospitals, water-supply systems and telecom nodes.

During the Cyclone:

1. Safety is paramount. Field work is suspended whenever sustained wind speeds exceed safe operating limits, and all on-site activity resumes only with clearance from the Safety Officer.
2. Control rooms remain staffed around the clock. SCADA and VSAT systems continue to provide live status updates, and hourly situation reports are transmitted to the State Load Despatch Centre.

Immediate Restoration (First 72 Hours):

I. Within six to twelve hours of landfall—once conditions allow—assessment teams use drones and ground patrols to identify and geo-tag damage. ERS towers are deployed rapidly to bypass collapsed structures and to re-establish ring feeds, giving priority to feeders that supply hospitals, water works and essential communications.

II. If ERS deployment alone cannot restore local grids, truck-mounted 33 kV mobile substations are sent to key district hubs within the sixty-kilometre coastal belt.

Diesel generators pre-installed at substations provide auxiliary power to support these operations and enable permanent repairs.

Medium-Term Recovery (Up to 14 Days):

10. Temporary ERS installations are replaced with permanent towers and foundations designed for Wind Zone VI conditions. Conductors are re-strung and insulators—preferably long-rod or silicone composite for saline environments—are repaired or replaced. Transformer and other high-tension equipment are inspected and restored.
11. Depots are immediately replenished and purchase orders raised to replace used ERS components, conductors and insulators. All regulatory incident reports and applications for State and National Disaster Response Funds are filed as required.

Long-Term Mitigation:

15. Beyond immediate restoration, OPTCL continues to strengthen the network. The DRPS Phase II programme accelerates underground cabling of the most vulnerable urban and coastal corridors and upgrades overhead lines with shorter spans and higher wind-rated towers.
16. A permanent fleet of 33 kV truck-mounted mobile substations will be procured and stationed at DRC hubs so that each coastal division has dedicated rapid-response capacity. An ERS Division—headquartered in Bhubaneswar is being institutionalized to maintain equipment, conduct training and manage mutual-aid agreements with neighbouring utilities and POWERGRID for cranes and heavy hardware.

Capacity Building and Oversight:

13. All ERS crews undergo annual table top and field drills, including full tower erection and mobile-substation commissioning. Weekly patrols, thermo-vision inspections and safety audits are mandated for coastal towers, and results are logged centrally.
14. Recently a five-day mock exercise on the erection of 400 kV ERS towers and stringing of ACSR Twin Moose Conductor was conducted near Bhubaneswar Baliyatra Ground. The program was designed as a refresher and capacity-building initiative, enabling OPTCL engineers to gain hands-on exposure to ERS tower components, erection procedures, and stringing

operations. This exercise not only helped in familiarization and skill enhancement but also strengthened the preparedness of field engineers to effectively respond during exigencies and restoration scenarios.

15. During any event, daily restoration reports are sent to the Odisha Electricity Regulatory Commission and the State Disaster Management Authority, followed by a formal after-action review within seven days.

Regarding design of Multi circuit tower

OPTCL has already standardized the design of multi-circuit towers. At present, such towers are being used in the 220 kV Pandiabil–Samangara transmission line. Further, in many upcoming projects, wherever required, multi-circuit towers are planned to be adopted.

2. The objections not specifically admitted may be deemed to have been denied.

PRAYER

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of M/s. Bhushan Power and Steel Limited while approving ARR and Transmission Tariff of OPTCL for FY 2026-27 & Truing up application for FY 2024-25.

By the Applicant
Through

Sr. GM (El.), RT&C

Bhubaneswar
January 27, 2026

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Annexure-01

ODISHA ELECTRICITY REGULATORY COMMISSION
BIDYUT NIYAMAK BHAWAN
PLOT NO.4, CHUNOKOLI, SHAILASHREE VIHAR,
BHUBANESWAR - 751021
TEL. No. 2721048, 2721049, FAX: 2721053/2721057
E-mail: orierc@gmail.com
Website: www.orierc.org

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No. DIR (T)-332/2008/ 177
Dt. 01.02.2021

To

The Managing Director,
OPTCL,
Janpath, Bhubaneswar-22.

Sub: Billing procedure consequent upon implementation of new Open Access Regulations, 2020.

Ref: Your letter No. RT&C-47/2020/18(3) dt.08.01.2021.

Sir,

In inviting a reference to the subject mentioned above, it is to intimate you that transmission tariff of OPTCL is governed under OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 which is still in force.

Regulation 6.5 of Transmission Tariff Regulation, 2014 states as follows:

*"**Transmission Tariff:** The Transmission Tariff payable by the Beneficiaries of the Transmission System shall be designed to recover the Aggregate Revenue Requirement approved by the Commission for each year of the Control Period."*

Regulation 2.1(h) of the same Regulation states that a distribution licensee shall necessarily be a long term transmission customer for which it shall be required to enter into a transmission service agreement with the transmission licensee.

Aggregate Revenue Requirement of the transmission licensee is recovered from the beneficiaries DISCOMs who are long term open access customers. The Commission carryout true up exercise under the same Regulation basing on the actual expenses booked in the audited books of the account of the transmission licensee for the year and expenses allowed in the ARR for the corresponding financial year. Therefore, the approved ARR of the transmission licensee is well taken care of for any short fall on this account. The STU has entered into transmission service agreement with the DISCOMs accordingly.

O/C

The Open Access Regulation, 2020 stipulates that the open access customer who wishes to avail open access under that Regulation shall have to apply for the same. DISCOMs do not come under the same and are governed under Transmission Tariff Regulation, 2014 and consequential special transmission service agreement. The long term customer other than the DISCOMs shall come under OERC Open Access Regulation, 2020.

Therefore, you are required to follow OERC Transmission Tariff Regulation, 2014 scrupulously as long as it is in force.

Yours faithfully,

SECRETARY 1.2.2021

Annexure-02

सत्यमेव जयते

अखिल भारतीय विद्युत सांख्यिकी

All India Electricity Statistics

सामान्य पुनर्विलोकन 2025

(2023-24 के आंकड़े समाविष्ट)

General Review 2025

(Containing Data for the Year 2023-24)

भारत सरकार
विद्युत मंत्रालय
केंद्रीय विद्युत प्राधिकरण
नई दिल्ली
नवंबर 2025

Government of India

Ministry of Power

Central Electricity Authority

New Delhi

November 2025

(अधिनियम 2003 की धारा 73 (आई) एवं (जे) के तहत के. वि. प्रा. के दायित्व के पालन हेतु प्रकाशित)

(Published in fulfilment of CEA's obligation under Section 73(i) & (j) of the Electricity Act 2003)

Table 6.2
Regional Transmission Losses
Utilities
2023-24

Region	Energy Available in the Region (GWh)	Export to other Region (GWh)	Export to Nepal (GWh)	Export to Bangladesh (GWh)	Export to Bhutan (GWh)	Export to Myanmar (GWh)	Total Energy drawal by States/Utilities (GWh)	Transmission Losses (GWh)	Transmission Losses (%)
1	2	3	4	5	6	7	8	9 (2-3-4-5-6-7)	10((8/2)x100)
Northern Region	234996.97	3117.23	170.57	0.00	0.00	0.00	224302.97	7406.20	3.15
Western Region	332120.58	99896.14	0.00	144.00	0.00	0.00	221708.25	10372.19	3.12
Southern Region	212787.85	4758.03	0.00	0.00	0.00	0.00	200663.51	7366.31	3.46
Eastern Region	142021.92	55318.56	1254.36	7315.07	1330.61	0.00	70787.65	6015.68	4.24
North Eastern Region	19710.81	3117.64	0.00	1072.11	0.00	8.47	14746.36	766.23	3.89

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur
Bhubaneswar-751021

Case No: 121/2025
Filing No: 1

IN THE MATTER OF:

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022.

... **Applicant**

AND

IN THE MATTER OF:

M/s. Visa Steel Limited, Kalinganagar Industrial Complex, At/Po- Jakhapura, Dist- Jajpur, Odisha-755026, Email: dr.dash@visasteel.com, Mobile: 9777958822

...Respondent

The humble respondent above named most respectfully submit as under:

1. That the objector i.e. M/s. Visa Steel Limited (hereinafter referred as "VSL" / "Respondent") is a company incorporated under the provisions of the Companies Act, 1956, having its Registered Office at VISA House, 11 Ekamra Kanan, Nayapalli, Bhubaneswar – 751015, Odisha and plant site at Kalinga Nagar Industrial Complex, At/Po-Jakhapura-755026, Dist- Jajpur, Odisha. That VSL has set-up an Integrated Steel Plant at Kalinga Nagar Industrial Complex, At/Po- Jakhapura-755026, Dist- Jajpur, Odisha. The Applicant has also installed Co-generation based Captive Generating Plant of 3 x 25 MW Capacity in its plant premises.

2. VSL is submitting the following points on the application of OPTCL for determination of Annual Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 for kind review and necessary action by the Hon'ble Commission.

Swijaraj Dash

VISA STEEL LTD. KNIC, JAJPUR

3. Human Resources Expenses:

That OPTCL has projected Employee Cost expenditure at Rs. 531.52 Crore for FY 2026-27 against Rs. 488.63 Crore as approved by the Commission to be spent during FY 2025-26. The summary of Employee Expenses of OPTCL for the last sixteen financial years is furnished below.

Summary of Employee Expenses

Financial Year	Proposed	Approved	Actual
2010-11	865.13	279.56	173.11
2011-12	952.06	338.14	279.56
2012-13	655.36	318.48	268.59
2013-14	341.2	289.3	191.70
2014-15	361.38	318.18	309.59
2015-16	310.02	305.23	285.95
2016-17	399.56	292.55	382.44
2017-18	462.33	304.5	380.32
2018-19	419.57	360.4	375.65
2019-20	421.99	419.77	394
2020-21	466.22	415.87	373.19
2021-22	532.73	457.88	474.83
2022-23	526.53	477.19	
2023-24	508.76	449.08	
2024-25	582.06	488.63	
2025-26	554.05	488.63	
2026-27	531.52		

OPTCL may provide a detailed employee list cadre wise approved sanctioned strength by Govt. of Odisha vis-avis actual post filled up and post laying vacant.

The cost break-up of the employee expense is provided below:

Dwijaraj Dash

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Sl. No	Particulars	Prev. Year 2024-25	Curr. Year 2025-26	Ensuring Year 2026-27
A	**Salary & Allowance**	1	2	3
1	Basic Pay	151.82	158.83	159.57
2	Dearness Allowance	79.79	96.89	102.12
3	House Rent Allowance	25.25	23.89	25.77
4	Medical Allowances	7.66	8.34	8.38
5	Conveyance Expenses (Allowance + Reimbursement)	4.13	4.08	6.28
6	Other Allowance	1.63	1.70	1.81
7	Bonus	0.18	0.20	0.20
8	Stipend for New Recruitment	8.09	4.05	5.70
9	Stipend to Apprentice	1.45	2.00	2.08
10	Arrear Salary for Wage Board Revision			
	Sub-total (A)	280.00	299.59	311.91
B	**Additional Employee Cost**			
1	Out Sources Engagement	3.78	4.34	7.01
	Sub-total (B)	3.78	4.34	7.01
C	**Other Employee Cost**			
1	Leave Travel Concession	0.15	0.59	0.59
2	Honorarium	0.10	0.12	0.19
3	Ex-gratia	6.44	6.50	7.92
4	Staff Welfare Expenses	4.48	7.94	12.02
5	Other Employee Cost	-	0.03	0.04
6	Capacity Building Charges	1.30	2.00	2.40
	Sub-total (C)	12.48	17.19	23.16
D	**Terminal Benefits**			
1	Pension	135.94	140.02	144.22
2	Gratuity	13.22	13.62	14.03
3	Leave Salary	19.91	20.51	21.12
4	Other (including contribution to NPS)	24.46	24.99	26.47
	Sub-total (D)			
E	**Total Employees Cost (A+B+C+D)**	489.78	520.26	547.93
F	Less: Employees Cost Capitalised	16.40	16.40	16.40
G	**Net Employee Cost (E- F)**	473.38	503.85	531.52

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1. **Basic Pay and Grade Pay:** Basic Pay and Grade Pay proposed for FY 2026-27 = Rs. **159.57** Cr. is based on actual cash flow for FY 2025-26 with additional increment of 3% and average number of employees. OPTCL is planning to recruit 250 Nos. employees during FY 2025-26 and 50 Nos. in FY 2026-27.
2. **DA:** OPTCL proposed 64% DA for FY 2026-27, considering Finance Dept guidelines. However, actual increases in DA may be reviewed.
3. **HRA:** OPTCL proposed HRA @19%. Actual cash flow may be considered.
4. **Outsourcing:** OPTCL is functioning with 50% of manpower and has outsourced services. Accordingly, Rs. 7.01 Cr. has been proposed towards payment to outsourced personnel. The same can be reviewed.
5. OPTCL is planning to recruit 250 Nos. employees during FY 2025-26 and 50 Nos. in FY 2026-27 and has proposed Rs.05.70 Cr. towards stipend for the new recruiters. Considering the past trend of recruitment the same may be reviewed.
6. Actual addition of employees is lesser than the approved. Stipend and employee cost should be approved by reviewing proposed addition of employees.
7. Terminal benefits should be reviewed on an actual cash flow basis.

Hence the Employee cost Expenses of OPTCL for FY 2026-27 may be approved accordingly by the Hon'ble Commission.

4. Repair and Maintenance (R&M) expenses

That OPTCL has projected Repair and Maintenance Expenses at Rs. 259.65 Cr for FY 2026-27 against Rs. 160 Crs as approved by the Commission to be spent during FY 2025-26.

The summary of Repair and Maintenance (R&M) expenses of OPTCL for the last sixteen financial years is furnished below.

Summary of R & M Cost

Financial Year	Proposed	Approved
2010-11	98.14	60
2011-12	93.89	75
2012-13	95.46	95
2013-14	108.91	60
2014-15	146.77	93
2015-16	154.11	108
2016-17	170.66	110.59

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2017-18	155.11	124.97
2018-19	156.19	111
2019-20	115.22	115.22
2020-21	140.59	115.22
2021-22	151.1	118.61
2022-23	148.04	110.5
2023-24	164.34	135
2024-25	169.3	135
2025-26	217.7	160
2026-27	259.65	

It is respectfully submitted that R&M cost of OPTCL for FY 2026-27 may be approved accordingly by the Hon'ble Commission.

5. Administration & General Cost

That OPTCL has projected Administrative and General (A&G) expenditure at Rs. **46.95 Crs** for FY 2026-27 against Rs. **42.46** Crs as approved by the Commission to be spent during FY 2025-26.

The summary of Administrative and General Expenses of OPTCL for the last sixteen financial years is furnished below.

Summary of A&G Cost

Financial Year	Proposed	Approved
2010-11	26.99	15.14
2011-12	38.34	18
2012-13	39.11	21.25
2013-14	23.09	22.39
2014-15	25.46	24.01
2015-16	32.36	24.37
2016-17	25.58	24.66
2017-18	26.11	25.6
2018-19	27.23	26.44
2019-20	28.07	27.55

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2020-21	28.66	28.72
2021-22	38.13	30.35
2022-23	43.18	37.73
2023-24	47.07	40.28
2024-25	51.13	37.05
2025-26	49.8	42.46
2026-27	46.95	

The Hon'ble Commission may review the Inspection fee expenses and training expenses. Details of the training calendar and its benefits may be checked.

6. Depreciation Cost

That OPTCL has projected depreciation expenditure at Rs. 337.09 Crs for FY 2026-27 against Rs. 284.33 Crs as approved by the Commission to be spent during FY 2025-26.

The summary of Depreciation of OPTCL for the last sixteen financial years is furnished below.

Summary of Depreciation Cost

Financial Year	Proposed	Approved
2010-11	153.31	76.6
2011-12	156.4	79.42
2012-13	155.99	78.57
2013-14	172.85	89.4
2014-15	176.02	92.71
2015-16	197.72	107.48
2016-17	150.5	101.45
2017-18	192.59	130.76
2018-19	217.9	145.43
2019-20	186.03	162.06
2020-21	208.59	195.59
2021-22	276.5	232.95
2022-23	263	233.57
2023-24	293.96	269.54

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2024-25	320.03	275.67
2025-26	356.57	284.33
2026-27	337.09	

- Norms of tariff regulations and rates as specified in the Transmission Tariff regulations should be considered.
- The depreciation should be determined after due scrutiny.

7. OPTCL has only considered 275.35 Cr towards miscellaneous receipts which needs to be checked prudently. As per regulation 8.30 & 8.40 of Transmission Tariff Regulation all these expenses are to be deducted in full from the ARR for the purpose of calculation of tariff of OPTCL.

8. Annual Revenue Requirement:

That the OPTCL has given the proposal for an annual revenue requirement of Rs. 1765.40 Crore for FY 2026-27 against Rs. 1331.02 Crore as approved by the Commission to be spent during FY 2025-26.

The summary of ARR of OPTCL for the last fifteen financial years is furnished below.

Financial Year	Proposed	Approved
2011-12	1435.88	579.34
2012-13	1348.46	612.53
2013-14	874.74	597.87
2014-15	988.8	641.3
2015-16	1008.36	630.94
2016-17	975	623.25
2017-18	1013.63	639.4
2018-19	990.65	659.95
2019-20	861.27	706.71
2020-21	966.44	713.84
2021-22	1307.17	792.93
2022-23	1247.14	831.95
2023-24	1102	896.18

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2024-25	1380.69	913.7
2025-26	1663.33	1331.02
2026-27	1765.40	

Hence the Annual Revenue Requirement of OPTCL for FY 2026-27 may be approved accordingly through a prudence check and based on the submission made above by the Respondent.

9. Determination of Transmission Charges

OPTCL has given the proposal for transmission charges @ **35.61 P/U** for FY 2026-27 against 25.5 P/Unit as approved by the Commission during FY 2025-26. The proposed Transmission Tariff of **35.61 P/U** is very high and should not be permitted. This will adversely affect the RST of the DISCOMS and will be a huge burden on the consumers of Odisha.

10. The proposal by OPTCL to disallow the rebate on prompt payment for Open Access customers, particularly Long & Medium-Term Open Access customers, needs to be carefully reviewed in the context of its impact on customer relations, operational efficiency, and regulatory guidelines.

While OPTCL has cited that there is no provision for rebate for early payment in the Open Access Regulations of 2020, the previous practice of offering a 2% rebate for payments made within two days was beneficial in encouraging timely payments and improving the cash flow for OPTCL. Discontinuing this rebate may have adverse effects on the payment behavior of Open Access customers, leading to potential delays in payment and reduced financial liquidity for OPTCL.

It is also essential to consider the implications of such a move on the competitiveness and attractiveness of Odisha's transmission system to potential Open Access customers. Providing financial incentives, such as the prompt payment rebate, could serve as a mechanism to retain customers and ensure a smoother cash flow for OPTCL. Additionally, a shift in policy might need to be discussed and approved by the Commission to ensure it aligns with the broader regulatory framework and customer service goals. In light of these factors, it is proposed that OPTCL may reconsider the discontinuation of the rebate, or alternatively, propose a revised rebate structure that balances the financial interests of both OPTCL and its Open Access customers. The Commission's input and further deliberation on the matter may be necessary to ensure that the policy is fair, transparent, and in the best interest of all stakeholders.

Jairaj Dash

VISA STEEL LTD. NIC, JAJPUR

11. The Open Access Regulations, 2020 treat the DISCOMs and other Open Access users like CGP, and Industrial Consumers on the same footing. However, exceptions is being carved out, wherein the DISCOMs need not submit their contracted quantity and are allowed to pay Transmission Charges on the actual energy transacted, whereas the other OA customers like CGPs, Industries are being forced to pay the Transmission Charges on the Contracted Quantity. Further, OPTCL has proposed to do away with the prompt payment rebate for OA customers like CGPs and Industries while allowing the prompt payment rebate benefit to DISCOMs. This type of differential treatment is against the Open Access Regulation, Grid Code, and statutory provision under the Electricity Act 2003. Therefore, it is requested that the Commission to treat all the Transmission Users i.e. CGPs, Industries, and DISCOM on the same footing with provision for charges, and rebates on the same principle without any discrimination.

12. Transmission Loss:

OPTCL has proposed transmission loss at 3.05%. In conformity with the power sector reform, OPTCL needs to reduce the transmission loss significantly. We propose to approve transmission loss of OPTCL at 2.5%.

That OPTCL has not yet identified the areas where loss is maximum and OPTCL needs to formulate action plans for loss reduction. OPTCL should inform the methodology adopted to estimate the transmission loss for every year. OPTCL should have undertaken energy audits of lines and substations to know the quantum of transmission loss in the system. Proposing the transmission loss arbitrarily without giving the breakup of the losses in different components of transmission system i.e., lines, substations, power transformers and auto transformers etc are not appropriate for the S.T.U. Thus proposing loss as per the business plan is meaningless. There is enough measure by which OPTCL could reduce the Transmission loss. OPTCL should conduct energy audits and their standard performance should be monitored by a third party auditor appointed by the Commission so as to assess the actual performance of the licensees.

It is prayed before the Hon'ble Commission may kindly re-calculate and approve transmission loss accordingly.

13. That earlier CGPs used to inject inadvertent power to the grid and GRIDCO availed the benefits of inadvertent power. GRIDCO also used to pay the hydro pool cost towards the inadvertent power. However, from FY 2019-20 onwards GRIDCO has stopped making payment towards inadvertent injections. Hence, OPTCL became the ultimate beneficiary of such injection of inadvertent power. We pray to the Hon'ble Commission to direct OPTCL to submit the detailed list of inadvertent injection for each month by each CGP and consider the same as an additional injection to the grid accordingly to calculate the transmission loss. The data of inadvertent injection is available with OPTCL and SLDC for each month for

Durjaya Dash

VISA STEEL LTD. KHURDA

each CGP who are connected to EHT transmission system of OPTCL. The entire stakeholder and consumers of Odisha will be benefitted by such methodology as the intra-state transmission loss will reduce significantly.

14. Given the significance of maintaining transparency and accuracy in the transmission system's performance, it is requested that OPTCL conduct a Third-Party Energy Audit of its transmission loss. The energy audit should be carried out by an accredited energy auditor in line with the guidelines specified by the regulatory authorities.

The requirement to conduct an annual energy audit is crucial not only for assessing transmission losses but also for identifying potential inefficiencies and implementing corrective actions that can help in optimizing the system's overall performance. This audit will provide an independent, unbiased evaluation of the transmission system's energy losses and help in formulating strategies for loss reduction, which will ultimately contribute to improving the operational efficiency and financial health of OPTCL.

15. Open Access Charges:

Each year Hon'ble OERC informed OPTCL to submit 400 kV, 220 kV, 132 kV Power Transformer and EHT lines loading. OPTCL should make a practice to submit the Power flow data for 400 kV, 220 kV line and 132 kV line and its loading and the entire Auto-transformer loading, Power Transformer and ICT loading along with the ARR application. Moreover, by submitting only power transmitted on the peak demand day will not solve the purpose. In order to ascertain the margin availability, OPTCL may be directed to submit the maximum power handling capability, power flow and % loading of all the 400 kV, 220 kV, 132 kV line and Power Transformer, Auto Transformer, ICT Transformers. It is also desired that OPTCL should conduct load flow analysis to handle around 2000-3000 MW differential load in appropriate manner.

Once these data are made available, it can be ascertained that, there are sufficient margin is available in the transmission network and in order to utilize it fully, STOA should be promoted and the charges for the same may be kept at 1/4 of the MTOA and LTOA charges and necessary amendments in the regulations may be made.

16. Introduction of Reactive Energy Charges:

OPTCL has proposed to introduce Reactive Energy Charges of 3 Paise / kVARh which is very high and should be reduced in consultation with various stakeholders.

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17. Levy of Grid Support Charge for connectivity:

OPTCL has submitted an application to the Hon'ble OERC on 26.06.2024, to determine and approve the imposition of Grid Support Charges for industries with Captive Generating/Cogeneration plants that operate alongside the OPTCL grids.

The case was registered as OERC Case No.-44/2024. In an order dated July 6, 2023, the High Court suggested that if OPTCL wishes to pursue the imposition of Grid Support Charges, they should file a separate application with the OERC. The court emphasized that the OERC, under Section 181 of the Electricity Act, should examine the justifiability of such charges. Hon'ble Commission in order dated 09.07.2024 in case no 44 of 2024 has directed OPTCL to submit a consolidated report considering certain queries. OPTCL has submitted the report on 29.01.2025.

18. It is prayed before the Hon'ble Commission that the levy of Grid Support Charges (GSC) on Captive Generating Plants (CGPs) be abandoned. CGPs are operated by industries that already have a contract demand with the respective DISCOMs, which means they are contributing to the grid through their contracted capacities. The imposition of GSC on CGPs would lead to a scenario where industries are effectively being charged twice for grid support – once through their contract demand with DISCOMs and again via the proposed GSC.

This double charging would result in an unfair financial burden on industries that are already supporting the grid by paying for their contractual obligations. Such a practice could discourage further industrial investments in renewable energy projects, which is counterproductive to the state's objectives of promoting sustainability and industrial growth. Therefore, in the interest of fairness and to avoid unnecessary financial strain on industries, OPTCL should abandon the proposal to levy GSC on CGPs. This would ensure that industries are not unfairly penalized for their contribution to the grid, while also promoting the continued growth of renewable energy in Odisha.

19. It is proposed that OPTCL should proactively prepare and maintain a monthly status report outlining the available transmission lines, substation details, bay availability, and transformer capacity. This would enable prospective developers to assess the existing infrastructure and apply for an NOC for grid connectivity before submitting their applications to the RE nodal agency. By making this information accessible, OPTCL can streamline the process for developers, allowing them to submit their grid connectivity applications with more certainty.

Under the current practice, OPTCL does not conduct a prepaid system study unless the project has received approval from a nodal agency. However, it is recommended that

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OPTCL issue the NOC for grid connectivity based on the available infrastructure information, without requiring a prepaid system study at this early stage. The detailed prepaid system study can be conducted later, once the project has been approved by the relevant nodal agency. This approach would help accelerate the approval process and ensure timely facilitation of renewable energy projects in Odisha, while ensuring that the system remains aligned with the capacity of existing transmission infrastructure.

20. OPTCL may be directed to submit the current status of the 765 kV transmission network plan, specifically for the two 765 kV ISTS lines: Angul to Gopalpur and Angul to Paradeep, as well as the status of the 765 kV substation in the Kolabira area. In addition, OPTCL should provide detailed updates on the progress of transmission projects such as the Paradeep-Mahakalapada 765 kV line, the 400 kV substations at Joda, Ersama (Paradeep), and Neulapoi.

Furthermore, OPTCL should inform the Commission about the likely transmission and capacity charges for these projects, ensuring that they are transparent and justifiable. These charges should be subject to a prudence check by the Hon'ble OERC to assess whether they adequately serve the interests of consumers and the state. In cases where the charges do not align with the best interests of the consumers and the state, the Commission may not approve the proposed capital expenditure plan and tendering process. In such instances, OPTCL should be instructed to initiate a fresh tendering process under the Intra-State Transmission Plan to ensure that the most optimal and cost-effective solutions are selected.

21. Transmission business being a capital intensive projects requires long term planning. Therefore, Hon'ble OERC may direct OPTCL to submit MYT tariff and long term Business Plan based on which Investment Plan should be provided.

22. That Intrastate transmission system should be developed in a coordinated manner in consultation with CTU, State govt., Generating companies, Regional Power Committees, CEA & licensees. However such grid coordination meetings are not happening regularly. It is proposed that the grid coordination committee meeting may be conducted regularly. Nos of industries are facing lots of difficulties in getting grid connectivity and enhancement of contract demand. Even the Hon'ble OERC has directed to hold a meeting of OPTCL with DISCOM on a monthly basis to ensure smooth operation of the power sector and MOM to be furnished to OERC. The Hon'ble OERC in its earlier transmission tariff order dated 13.02. 2024 in case no. 113/2023 has directed to submit the revised 14th inter-state transmission plan of OPTCL for approval. OPTCL may kindly submit the status of the 14th inter-state transmission plan of OPTCL and stage wise implementation plan.

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23. The Hon'ble OERC has published the OERC (Development of Intra-State Transmission Projects through Tariff Based Competitive Bidding in the State of Odisha) Order, 2022. OPTCL may be directed to submit an action taken report towards execution of new transmission projects. The Hon'ble OERC has earlier directed OPTCL to standardized the transmission line tower, multi-circuit tower etc. the Hon'ble OERC may pass appropriate order.

24. Further, it is proposed that OPTCL should set up an independent testing lab accredited by NABL for testing relays, meters, transformer oils so that such facilities can be availed by industries.

25. It is noted that OPTCL has claimed ₹0.35 Cr towards annual Grid Coordination Committee (GCC) expenses. However, the respondent seeks clarification from OPTCL regarding the number of GCC meetings conducted during FY 2023-24, FY 2024-25 and FY 2025-26. Additionally, OPTCL should provide details of the outcomes from each GCC meeting or make this information publicly available on its website for transparency and accountability.

The respondent further understands that, as per the provisions of Chapter 11, Clause 2 (2) of the Odisha Grid Code Regulation, 2015, there appears to be a lack of GCC meetings being held in the prescribed manner. It is crucial that the objectives of the GCC, which are to ensure efficient coordination between transmission, distribution, and generation entities, are met as per regulatory requirements. Therefore, OPTCL should clarify the status of GCC meetings, as well as any actions taken to address this issue, ensuring compliance with the Grid Code and the effective functioning of the transmission and distribution system in Odisha.

26. It is proposed that OPTCL should conduct a feasibility study to assess the potential of converting the existing 26 numbers of 132 kV switching stations into 132/33 kV substations. This conversion would involve establishing additional bays and installing 132/33 kV transformers, thereby enhancing the capacity to accommodate the future load requirements of DISCOMs. The proposed upgrade would not only cater to the increasing demand from existing consumers but also provide a critical infrastructure platform for connecting future renewable energy (RE) projects, particularly solar power plants, into the grid. This conversion aligns with the growing need for decentralized and renewable energy sources, which are integral to meeting the State's sustainability and decarbonization goals. By expanding the grid infrastructure, OPTCL can ensure that the transmission network is future-proofed to handle an influx of renewable energy, which is expected to play a key role in Odisha's energy transition. Moreover, this initiative will reduce the load on existing substations and improve the overall grid stability, enabling efficient power distribution across the state. Therefore, a comprehensive feasibility study by OPTCL will allow for a detailed assessment of technical, economic, and environmental implications, thereby

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ensuring that the infrastructure investments are both optimal and sustainable in the long term.

27. OPTCL should make a standard practice to prepare its ARR application and insert these regular features during the ARR application stage considering all relevant query of Hon'ble OERC. This will be quite helpful for the Respondents as well as for the officials of Hon'ble OERC for conducting proper analysis and scrutiny.

28. The Commission should direct OPTCL to engage with the Government of Odisha to secure funding for economically unviable projects and other critical infrastructure developments that serve the larger interest of the State. Many transmission projects, though essential for grid reliability, regional development, and equitable power access, may not be financially viable solely through tariff-based funding. Government grants can bridge this gap, ensuring that crucial transmission infrastructure is developed without placing an excessive financial burden on consumers. Additionally, state-funded support for such projects would facilitate balanced regional growth, promote industrialization in remote areas, and enhance overall energy security. A coordinated approach between OPTCL and the Government will help in prioritizing strategic projects, optimizing resource allocation, and accelerating execution timelines. Therefore, securing grants for these projects is imperative to ensure a robust and resilient transmission network that supports Odisha's long-term energy and economic goals.

29. The Commission may direct OPTCL to continuously monitor the transmission system's operation and take proactive measures to prevent overloading or under loading which is essential for ensuring an efficient and reliable power network. Overloading can lead to equipment failures, increased technical losses, and reduced system lifespan, while under loading results in inefficient asset utilization and financial strain. By adopting innovative strategies such as dynamic load management, network reconfiguration, real-time data analytics, and grid optimization techniques, OPTCL can achieve optimal loading of the existing infrastructure. This will not only help in reducing transmission losses but also enhance grid stability and improve overall system efficiency. Additionally, leveraging advanced technologies like AI-driven predictive maintenance, demand forecasting, and adaptive grid control will enable a more resilient and cost-effective transmission network. Therefore, continuous monitoring and proactive intervention are necessary to maximize the operational efficiency of the transmission system, ensuring sustainable and economical power transmission for all stakeholders.

30. The Commission's earlier directive for coordinated development of the intra-state transmission network, ISTS, and downstream distribution infrastructure is crucial to ensure optimal asset utilization, financial prudence, and grid stability. Many substations under OPTCL remain underloaded due to the absence of necessary downstream infrastructure from DISCOMs, leading to stranded assets and inefficient capital deployment.

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To avoid such inefficiencies, it is essential that OPTCL, DISCOMs, and CTU synchronize their planning and execution timelines. This will prevent unnecessary transmission investments that burden consumers with higher tariffs without delivering corresponding benefits. Moreover, ensuring that transmission system strengthening projects align with actual load growth will reduce the risk of power evacuation bottlenecks, voltage fluctuations, and increased transmission losses. A structured, joint planning approach will enhance grid reliability, improve network efficiency, and protect consumer interests. Therefore, the Commission's directive to mandate discussions among stakeholders before execution is a necessary step to ensure a well-integrated, cost-effective, and sustainable power transmission system.

31. Therefore, Transmission system upgrades should be strategically planned rather than implemented in an ad-hoc manner. The Commission should direct that no transmission system strengthening proposals should be executed without the prior approval of the Commission. Strengthening measures should be backed by technical and economic justifications, as required by OPTCL's license conditions and tariff regulations. Transmission projects involve significant capital investments that ultimately impact consumer tariffs. Prior Commission approval ensures that OPTCL implements only necessary and cost-efficient projects. Avoids excessive capital expenditure, which could lead to unjustified tariff hikes for consumers. Aligns investments with the approved capital expenditure (CAPEX) plans under the tariff regulations.

32. OPTCL should be directed to consider the meter data to assess the month-wise transmission loss in intra-state transmission systems including losses at different voltage levels (i.e. 132 kV, 220 kV and 400 kV levels).

33. The power utility has proactively implemented multiple loss reduction strategies, including system automation, load bifurcation, and digitization of the grid. Despite these extensive efforts, the anticipated loss reduction has not been realized, proving that systemic challenges persist beyond mere technical upgrades. Load bifurcation improves local reliability, but its impact on overall transmission loss is minimal, as power still needs to travel long distances from generation to consumption points. The introduction of ring systems instead of radial networks has increased network stability and redundancy, but transmission losses are still governed by physical distance and resistance of the conductors. Advanced transformers and low-loss conductors have been introduced, yet their impact on overall losses will be realized only after complete replacement of old equipment across the entire network. Bay control units (BCUs) and digital substations provide enhanced monitoring and real-time control over power flow, reducing inefficiencies. However, these tools primarily assist in identifying losses rather than eliminating them outright. Their full impact will be seen once corrective actions are consistently implemented over a longer duration.

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34. It is proposed that Cyclone resilient robust electricity transmission and distribution infrastructure in coastal areas should be established by OPTCL. OPTCL may be directed to submit a report on how many mobile substations are available with them to meet the contingency situation during cyclone and their cyclone mitigation plan which has been earlier directed by Hon'ble OERC. OPTCL has not taken action for the design of multi-circuit and multi voltage transmission lines.

35. We request the Hon'ble Commission to kindly allow the Respondent to submit any additional submissions, memos, documents etc. as may be required and in general do all such things as may be required in connection with the above reply.

PRAYER

In the facts and circumstances stated above and in the interest of the parties and the larger interest of the State the Hon'ble Commission be pleased to pass appropriate orders to the effect that

1. ARR of OPTCL may be approved accordingly based on the submission made above.
2. The Transmission Charges should be reviewed and reduced substantially.
3. Transmission loss to be reduced considering the submission made for FY 2026-27.
4. Proposal of Reactive energy charges of 3 paise/KVARh should be rejected.
5. Proposal of OPTCL to levy of Grid Support Charge for connectivity may be rejected.
6. Each year truing up exercise and business plan approval should be carried out by Hon'ble commission through a process of public hearing.

Place: Bhubaneswar

Date: 10.01.2026

For M/s. Visa Steel Limited

Sanjay Dash

Authorized Signatory

VISA STEEL LTD. KNIC, JAJPUR

NOTARISED

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur
Bhubaneswar-751021

13 JAN 2026

Case No: 121/2025
Filing No: 1

IN THE MATTER OF:

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022

... Applicant

AND

M/s. Visa Steel Limited, Kalinganagar Industrial Complex, At/Po- Jakhapura, Dist- Jajpur, Odisha-755026, Email: dr.dash@visasteel.com, Mobile: 9777958822

...Respondent

Affidavit verifying the application 13 JAN 2026

I, Mr. Dwijaraj Dash, Son of Mr. Nrusingha Charan Dash aged about 582023 years, working as General Manager– Power & Power Distribution of M/s. Visa Steel Limited having its plant site office at Kalinga Nagar Industrial Complex, Jakhapura-755026, Jajpur, Odisha do hereby solemnly affirm and state as follows: -

That I am the Authorised person M/s. Visa Steel Limited and I am duly authorized to swear this affidavit on its behalf.

The statements made herein now are based on information and I believe them to be true

PLACE: Bhubaneswar
DATE: 10.01.2026

NOTARY GOVT. OF ODISHA (INDIA) JANMEJAYA RAUTRAY BHUBANESWAR REGD. NO.-ON-86/2012 EXPIRY DATE-26/7/2027

Dwijaraj Dash

DEPONENT

JANMEJAYA RAUTRAY
NOTARY, GOVT. OF ODISHA
BHUBANESWAR
REGD. NO.-ON-86/2012
Mob No-7978581217

VISA STEEL LTD. KNIC, JAJPUR

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur
Bhubaneswar-751021

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AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022

... **Applicant**

AND

M/s. Visa Steel Limited, Kalinganagar Industrial Complex, At/Po- Jakhapura, Dist- Jajpur, Odisha-755026, Email: dr.dash@visasteel.com, Mobile: 9777958822

...Respondent

Letter of Authorization

I, Mr. Dwijaraj Dash, Son of Mr. Nrusingha Charan Dash aged about 58 years, working as General Manager – Power & Power Distribution of M/s. Visa Steel Limited hereby authorize Sri Bibhu Swain, residing at K-8-82, Kalinga Nagar, Ghatikia, Bhubaneswar-751029 to be my representative to present the above case on my behalf before the Hon'ble Odisha Electricity Regulatory Commission relating to my above reply and to submit any additional submission, memos, documents etc. as may be required and in general do all such thing as may be required in connection with the above reply.

For M/s. Visa Steel Limited

Place: Bhubaneswar

Date: 10.01.2026

Dwijaraj Dash

Authorized Signatory

VISA STEEL LTD. KNIC, JAJPUR

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
PLOT NO. 4, SAILESHREE VIHAR,
CHANDRASEKHARPUR, BHUBANESWAR-751021

CASE NO. 121/2025
FILING NO. 3

IN THE MATTER OF: (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

And

(ii) Truing up application for the FY 2024-25 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

AND
IN THE MATTER OF: Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

..... Applicant

vrs

M/s. Visa Steel Limited, Kalinganagar Industrial Complex, At/Po- Jakhapura, Dist-Jajpur, Odisha-755026 and **16 others.**

..... Objectors

Rejoinder to the objections raised by the Objector M/s. Visa Steel Limited.

The humble applicant above named

MOST RESPECTFULLY SHEWETH:

1. That, the Objector M/s. Visa Steel Limited vide affidavit dated 16.01.2026 has raised certain submissions on ARR & Transmission Tariff Application of OPTCL for FY

Nabha Telecom Bank

2026-27 and Truing up application for FY 2024-25. In reply, OPTCL submits its rejoinder to the submissions in the following paragraphs.

Rejoinder to Para 3 to 8:

The respondent has submitted statistical data of the previous years comparing the proposed vis-à-vis approved in respect of expenses towards human resource expenses, R&M expenses, A&G expenses, depreciation and RoE with a request to approve accordingly after due scrutiny. In this regard, it is pertinent to mention that OPTCL has submitted its ARR application for FY 2026-27 as per the various provisions stipulated in OERC (Terms & Conditions for Determination of Transmission Tariff) Regulations, 2014 and directions of the Commission passed in different orders with proper justifications.

Further, details of Sanctioned strength vis-a-vis actual man in position is furnished below:

Manpower position as on 20.01.2026			
Category	**Sanctioned Strength**	**MIP**	**%**
Executive	2040	1400	68.63%
Non-Executive	3862	1342	34.75%
Total	**5902**	**2742**	**46.46%**

Rejoinder to Para 9:

Determination of Transmission Charges:

The Transmission infrastructures are created considering the demand and request of the DISCOMs / Industries from time to time, after due approval form the Hon'ble OERC through Transmission Plan. Being a Deemed Transmission License, OPTCL has always endeavored to create the Transmission infrastructure for providing reliable and quality power to the consumers of DISCOMs. Accordingly, every year OPTCL is adding more transmission assets to meet the requirement of DISCOMs. Transmission Charge is arrived at 35.61 paise per unit by dividing the total ARR of OPTCL with the recent realistic MU projections of DISCOMs and recovered from them on a monthly basis. This rate will decrease if DISCOMs drawal increases. In fact, OPTCL has consistently advocated for the recovery of transmission charges based on contracted capacity, in line with the practice followed by STUs in other states.

The proposed Transmission Charge of 35.61 p/u has been derived by considering the recent realistic energy demand projections of 41,849.28 MU as

communicated by the DISCOMs & other LTOA customers and the ARR figures have been arrived by OPTCL justifying component wise projections as per the provisions contained in OERC Transmission Tariff Regulations, 2014, OPTCL's Audited Accounts for FY 2024-25, all relevant data/information and materials. The details of projections are submitted in page 30 of the present ARR application of OPTCL for FY 2026-27. Moreover, OPTCL had furnished all requisite information and details as per the prescribed formats of the Hon'ble Commission with full justifications.

Hence, mere apprehension of the respondent towards imposition of excessive burden on Discoms seems to be inappropriate and unacceptable which is likely to be rejected at this juncture. Moreover, the contention of the stake holder operating in the value chain of electricity needs to appreciate the fact that the cost recovery has to be in full so as to make the sector sustainable.

Rejoinder to Para 10 & 11:

The Hon'ble Commission vide letter no. DIR (T)-332/2008/77 dated 01.02.2021 has clarified that the DISCOMs do not come under the new regulation "OERC (Terms and conditions of Intra state open access) Regulations 2020" and they are governed under OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014. A copy of the said letter is provided as **Annexure-01.** Further, the details of provision of Rebate have been meticulously mentioned in page no: 59 of our ARR application for FY 2026-27 as per the said OERC Regulations.

Rejoinder to Para 12-14:

Transmission Loss

The argument for transmission loss of OPTCL at 2.5% is without any justification. The actual transmission loss for the period **Apr' - Sep' 2025** is calculated to be **3.07%** as shown in the ARR & TT application for FY 2026-27 (page-205). This figure is **less than the actual** transmission loss during last year **i.e. 3.09%** for **FY 2024-25.** In fact, OPTCL had projected a Transmission loss of 3.05% for FY 2025-26, but Hon'ble Commission had set a target of 3.00% which could not be achieved yet.

In OPTCL system, the transmission loss is purely technical loss and a function of real time injection of power by a number of generators, system configuration and power flow requirements at different load centers. It depends on many parameters / factors such as distance and mismatch between generation and load centers, types of load, reactive power compensation, voltage profile, seasonal variation of demand load etc. Thus, OPTCL does not have much control over the same at any point of time. The

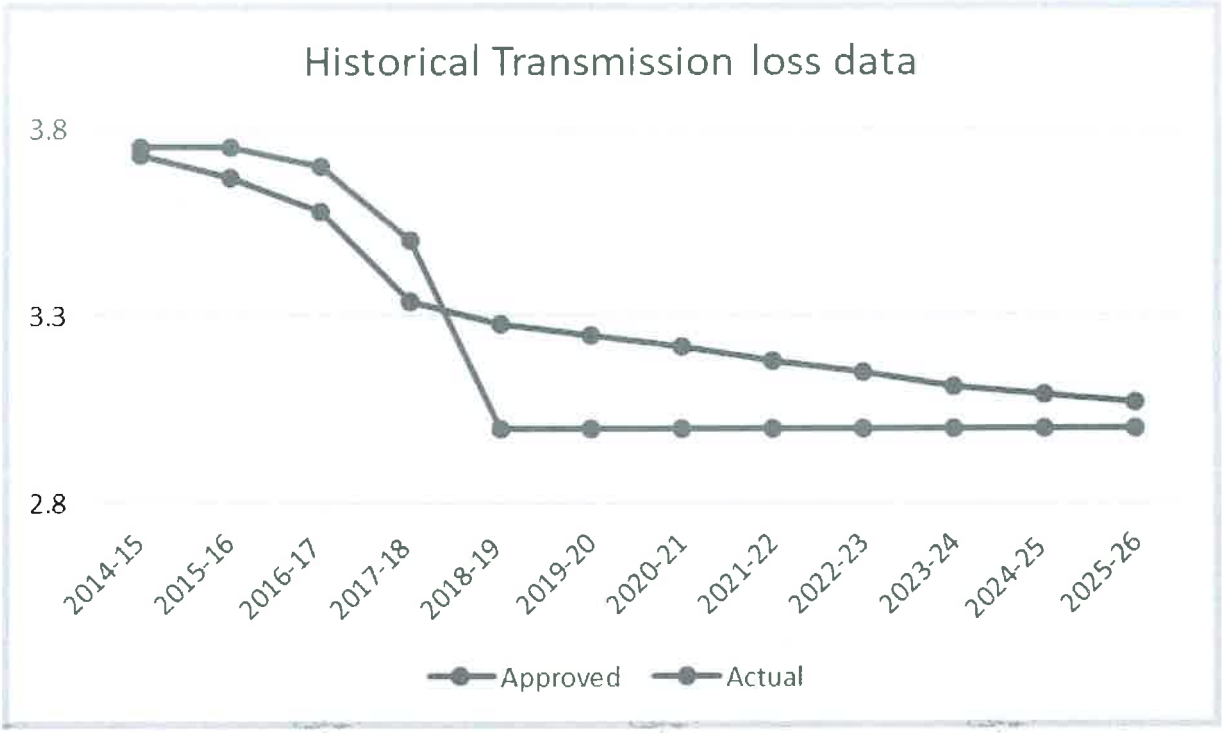
transmission system of OPTCL operates as an integral part of the Eastern Region Grid to serve the internal demand of the State as well as to carry out import and export of power depending upon the system demand.

As a matter of fact, some grid s/s and lines are being constructed in many remote and deprived areas funded under Central & State Govt. schemes in the interest of public. Additional length in EHT lines and Sub-stations in under-loaded areas are also responsible for increase in transmission loss.

Transmission Loss in OPTCL network is in a gradually reducing trend over the years i.e. from 3.73% during 2014-15 to 3.09% in 2024-25 and has remained 3.07% within 1st six months of FY 2025-26 mainly due to addition of infrastructure and various system strengthening works taken up by OPTCL. The actual losses incurred over the years by OPTCL have been within the margin allowed by Hon'ble Commission up to the year FY 2017-18. However in FY 2018-19, the commission set the loss at 3.00% though the projected transmission loss was at 3.25% and thereafter the commission has been pegging the transmission loss at the same level though loss projected by OPTCL remained in a downward trend.

Year	Tr. Loss proposed	OERC Approval	Actual
2014-15	3.75%	3.75%	3.73%
2015-16	3.75%	3.75%	3.67%
2016-17	3.70%	3.70%	3.58%
2017-18	3.50%	3.50%	3.34%
2018-19	3.25%	3.00%	3.28%
2019-20	3.25%	3.00%	3.25%
2020-21	3.20 %	3.00%	3.22%
2021-22	3.15%	3.00%	3.18%
2022-23	3.10%	3.00%	3.15%
2023-24	3.10%	3.00%	3.11%
2024-25	3.05%	3.00%	3.09%
2025-26	3.05%	3.00%	3.07% (1st six months)

NOTARY BHUBANESWAR ON 20/94 05.07.2030 GOVT. OF ODISHA



From the table given above, it is also clear that each year upto FY 2017-18, the transmission loss achieved by OPTCL has remained at a level lower than the approved figures by Hon'ble commission and from FY 2018-19 the target set by Hon'ble OERC appears to be very stiff which was hard to achieve though the trend of lesser transmission loss year after year has been achieved.

It may kindly be appreciated that transmission (technical) losses are inevitable in power systems due to the fundamental laws of physics and become increasingly difficult to reduce beyond a certain threshold. Further, at the all-India level, transmission losses across different regions have consistently remained above 3.12%. To substantiate our viewpoint, the transmission loss data for various regions is presented below for the kind consideration of the Hon'ble Commission.

Transmission loss of Different Regions for FY 2023-24

Region	Transmission loss
Northern Region	3.15%
Western Region	3.12%
Southern Region	3.46%
Eastern Region	**4.24% (Odisha- 3.11%)**
North Eastern Region	3.89%

(Courtesy: General Review 2025, Government of India, Ministry of Power, CEA attached as **Annexure-02**)

It may be observed that OPTCL's transmission loss of 3.07% is lower than the average transmission losses of all regions.

However, as a responsible Transmission utility, OPTCL is making an all-out effort to reduce the transmission loss further by undertaking various **system operation and loss reduction measures** by implementing the emerging technologies like **system Automation**, load bifurcation, **modification in system configuration**, procurement of more efficient equipment, **Digitalization of grids** by using SAS, Protection system improvement using Busbar protection and Event Logger, Advanced Metering Infrastructure**, Conversion of Radial to Ring system,** construction of GSS at **higher voltage levels** (220kV & 400kV), Replacement of old conductors and Transformers etc. to bring it to **3.05% by FY 2026-27.**

Steps taken for Energy Audit

Under the PSDF funding, SLDC is implementing the SAMAST project. After operational of SAMAST project, detailed energy auditing is possible.

Regarding inadvertent power

CGPs are not firm sources of power as they are essentially meant for the captive consumption. OPTCL does not agree to the assumption of the respondent that around 985MU of inadvertent power will be injected into the OPTCL system in a year considering the CGP capacity 9850MW. From the Pool Cost data provided by GRIDCO for the first six months of FY 2025-26, it is observed that the total inadvertent power injection is 230.643MU which has been already considered while calculating the Transmission loss of 3.07% in form T-6. Hence, Transmission loss as suggested by the Objector is not just and proper. Details of inadvertent power injected by CGPs in FY 2025-26 till September is furnished as under:

Month	Quantum of inadvertent power (MU)
April-25	38.31
May-25	38.79
Jun-25	39.97
Jul-25	30.39
Aug-25	43.27
Sep-25	39.92
Total	**230.64**

Further, it is submitted that Transmission charge is being computed on Open access transactions based on scheduled energy. Hence, OPTCL does not reap any benefit out of inadvertent power.

Rejoinder to Para 15:

Open Access Charges:

The system peak demand of **7069.89 MW** was touched on 12.08.2025 at 24:00 Hr. Statement on the loading pattern of the existing transmission system (400kV, 220kV & 132kV EHT lines along with loading on ICT, Auto & power transformers) corresponding to the peak demand is submitted in compliance to the OERC queries on ARR application of OPTCL for FY 2026-27 which will submitted to your good self along with this reply. OPTCL has already conducted load flow study considering different load scenarios i.e. Summer peak, Winter lean, High hydro, Low Hydro & Solar Peak in the Revised 14th Intra-state Transmission Plan of Odisha for FY 2022-23 to FY 2026-27, which has been duly approved by Hon'ble Commission vide case no. 08/2024. In the said report, percentage loading of all Transmission lines, ICTs, Auto & Power Transformers till FY 2026-27 have been mentioned. The Transmission infrastructures are being created considering the demand and requests of the DISCOMs/Industries from time to time after due approval form the Hon'ble OERC through Transmission Plan. DISCOMs and other LTA customers are responsible to bear the full approved ARR of OPTCL. STOA charge is being charged as per the Open Access Regulations, 2020.

Further, the revenue earned from STOA transactions is accounted for under Miscellaneous Income and is ultimately deducted from the Gross ARR to arrive at the net recoverable transmission charges to be recovered from consumers, including DISCOMs. Therefore, application of the 1/4th concept would result in an additional burden on domestic consumers. Further, as CERC regulations, the STOA rate is comparatively higher than LTA.

It is pertinent to mention that LTA consumers enjoy the first right and greater benefits compared to MTOA and STOA consumers. Therefore, for industries seeking a reliable, quality, and uninterrupted power supply, availing Long-Term Access (LTA) remains one of the most suitable options.

Rejoinder to Para 16:

Reactive Energy Charges:

As per Regulation 31(1) under Chapter-7 (IMBALANCE AND REACTIVE ENERGY CHARGES) of the OERC (Terms and Conditions of Intra-State Open Access) Regulations, 2020, payment for the reactive energy charges by open access consumers shall be in accordance with provisions stipulated in the State Grid Code or as may be specified in relevant regulations/orders of the Hon'ble Commission .

The Hon'ble Commission in Para 16 (page 5) of the order dated 05.02.2019 in Case No. 50/2017 has inter alia viewed that the provisional reactive energy charges of 3 paise/KVArH as allowed in the ARR order of OPTCL for FY 2018-19 continue for time being till a final justification is submitted by OPTCL in consultation with the stakeholders. However, despite raising reactive energy bills by SLDC since the beginning of FY 2025–26, no amount has been received in the Reactive pool account against Reactive Energy Charges to date due to non-payment by DISCOMs and other LTOA customers.

In view of the above, OPTCL proposes that 3paise/KVARh may be approved provisionally as Reactive Energy Charges for FY 2026-27.

Hence, the proposal of the objector to reduce the reactive energy charges as suggested by OPTCL is not just and proper.

Rejoinder to Para 17 & 18:

Levy of Grid Support Charge for connectivity:

The benefits derived by the CGPs with co-located loads are enormous. The benefits are in the nature of ancillary services which are not paid till now. The Grid support charges (GSC)/Parallel operation charge has been levied by different state Regulatory Commissions and upheld by APTEL and Supreme Court of India through various orders and hence proposed by OPTCL through a separate petition. OPTCL had filed an application (case No. 44 of 2024) on 26.06.2024 for determination and approval for levy of Grid Support Charges for industries having Captive Generating / Cogeneration plants and running in parallel with the Grids of OPTCL. Hon'ble Commission vide its order in case no. 44/2024 directed OPTCL to submit a consolidated report considering the observations/queries raised by the stakeholders in the earlier Cases filed by OPTCL. In compliance to above, OPTCL has filed the requisite report before Hon'ble Commission on 29.01.2025.

Further, it is submitted that a consumer connected to OPTCL network, pays demand charges for the contracted demand to concerned DISCOMs[. The rationale

behind this arrangement is that the corresponding quantum of transmission corridor capacity is reserved for the respective consumer, and only the remaining available capacity in the EHT network is allocated to other consumers. Moreover, it is observed that installed capacity of CGPs are much more than the contracted demand with DISCOMs.

However, it is observed that after synchronization with the grid, CGPs adversely impact grid quality through the injection of harmonics and other disturbances. To address such impacts and ensure grid stability, appropriate charges, namely Grid Support Charges, are required to be levied.

Further, it is submitted that OPTCL has proposed grid support charge factoring the contracted demand signed with DISCOMs by CGPs. So, double charging issue raised by the objector does not arise.

Rejoinder to Para 19:

Necessary system studies are invariably conducted and approvals are granted to RE developers applying for power injection or drawal following the completion of technical and field feasibility assessments.

Further, IT wing of OPTCL has developed a web portal i.e. ***Odisha Grid Insights*** **(OGrI)** portal to publish the key information related to OPTCL EHT Network. This portal will be updated on a monthly basis and will include the following details:

1. Geo-coordinates of all line assets under OPTCL.
2. Present loading data (Minimum & Maximum).
3. Projected load demand within the next 6 months.
4. Transformation capacity.
5. Network status, which will include:
    a. Spare feeders (equipped or not-equipped)
    b. Space available for feeder bays
    c. Possible take-off arrangements (by cable or by overhead)
    d. Evacuation facilities (radial mode or interconnected mode)
    e. Load category (percentage of industrial load vs. domestic load)

The portal is currently operational with most of the above information. The portal can be accessed at the following URL: **https://ogri.optcl.co.in**. This initiative will help RE developers to access the OPTCL network for finding potential injection points.

Rejoinder to Para 20:

Status of key Transmission projects is furnished below:
Project under ISTS

1. **765kV Angul – Gopalpur**
   a. Scheduled date of completion – December 2027.
   b. CERC yet to issue Transmission license to the L1 bidder under TBCB.
2. **765kV Angul – Paradeep**
   a. Scheduled date of completion – November 2026.
   b. CERC yet to issue Transmission license to the L1 bidder under TBCB.

Projects under OPTCL

1. **765kV Kolabira**
   - Approved under 21st CMETS-ER dated 22.08.2023
   - Land identification is in progress
2. **400kV Joda/Barbil (Basudevpur)**
   - Approved under 33rd CMETS-ER dated 05.08.2024
   - Land identification is in progress
   - Project will be executed by OPTCL upon finalisation of funding from Govt. and IP approval from Hon'ble Commission.
3. **400kV Ersama**
   - Scheduled date of completion – June 2026
4. **400kV Neulapoi**
   - Approved under 30th CMETS-ER dated 14.05.2024
   - Tender floated, work started

There is no provision of Capacity charges in the extant OERC Transmission Tariff Regulations, 2014. Since Gridco is procuring power through ISTS network, the transmission charges thereof is dealt by Gridco.

Rejoinder to Para 21:

It is intimated that the Business Plan of OPTCL for the 3rd Control Period, i.e., from FY 2024–25 to FY 2026–27, has been approved by the Hon'ble Commission vide Order dated 24.09.2025 in Case No. 20 of 2025.

Rejoinder to Para 22:

The Revised 14th Intra-State Transmission Plan of Odisha for FY 2022–23 to FY 2026–27 has been approved by the Hon'ble Commission vide Case No. 08/2024. Recently, the investment proposals for 37 projects were heard after inviting suggestions and objections from the general public.

Rejoinder to Para 23:

Initially construction of 400/220kV AIS S/S at Remuli along with associated lines was planned for TBCB . Subsequently, State Government after careful consideration have been decided to construct 400/220kV AIS S/S Remuli(at Basudevpur) and establishment of 2x160 MVA, 220kV GIS S/S at existing Barbil GSS along with associated 400kV & 220kV lines on cost plus method instead of TBCB mode. Accordingly, at present, there is no proposal for execution of any project under TBCB mode.

OPTCL has standardized technical specifications for transmission line towers/steel poles, power transformers, switchgear, surge arresters, CTs, PTs/CVTs, conductors, insulators, fire fighting systems, lighting systems, AC/DC systems, etc., and continues to incorporate improvements as identified for further refinement

Rejoinder to Para 24:

OPTCL maintains an in-house oil testing laboratory that serves as the central facility for analyzing oil breakdown voltage, dissolved gas analysis and PPM measurements. A relay testing laboratory is also planned. OPTCL will approach the Government of Odisha for funding to obtain National Accreditation Board for Testing and Calibration Laboratories (NABL) accreditation for both laboratories.

Rejoinder to Para 25:

No GCC meeting has been conducted in FY 2023-24 and 01 no. GCC meeting has been conducted in FY 2024-25. The details of recent GCC meeting conducted is furnished below:

GCC meeting	Date of meeting
17th GCC meeting	17.01.2025
18th GCC meeting	03.09.2025

OPTCL has already sought agenda items from various stakeholders for the 19th GCC meeting. Further, upon finalization of the agenda, the GCC meeting will be convened shortly. The amount proposed under GCC head will be utilised fully.

Rejoinder to Para 26:

OPTCL will take up the proposal of converting Switching Station to Substation based on the demand projection of DISCOMs and the proposal received by RE developers on a case to case basis with the approvals of Hon'ble Commission.

Rejoinder to Para 27:

The respondent's suggestion has been noted and OPTCL will include the details of loading pattern in the ARR filing of the coming years. Invariably, OPTCL has been sharing the details of loading pattern of all the ICTs, Auto & Power transformers in L-9 format (OERC approved format) as a part of ARR filing every year. Further, loading details corresponding to the maximum demand of **7069.89 MW** on 12.08.2025 has been provided in Compliance to the OERC queries on ARR application of OPTCL in case no. 121/2025.

Rejoinder to Para 28:

Since the creation of transmission infrastructure requires huge investments, OPTCL always requests the state Government for financial support. State Govt. has been contributing 100% financial assistance in the shape of grant/equity in case of non-remunerative and contributing 30% equity support in case of remunerative projects.

Rejoinder to Para 29:

To prevent overloading, regular system study has been carried out and augmented the network capacity as and when required. Priority has been given to use the under loaded network. As directed by Hon'ble Commission, regular meetings are being conducted with DISCOMs for creation and timely completion of downstream infrastructure for optimum utilization of transmission networks. New Transmission elements proposed by OPTCL to strengthen state evacuation are deliberated and approved in the CMETS-ER meeting, held on monthly basis which are further incorporated in National Transmission Network. At present, OPTCL is implementing the STAMS project, under which all network parameters will be monitored centrally. This will enable system operators to take prompt corrective actions, thereby enhancing grid stability and improving overall system efficiency. Further, OPTCL has planned for AI based inspection & maintenance of the Transmission lines and also planning for Asset Performance Management System with AI capabilities for predictive maintenance of its transmission assets.

Rejoinder to Para 30:

As per the provisions of Sections 39 and 40 of the Electricity Act, 2003, OPTCL, being the State Transmission Utility (STU), is responsible for the planning and

development of the transmission infrastructure in the State of Odisha. OPTCL obtains inputs from DISCOMs, industries, and generators, and thereafter prepares a comprehensive Intra-State Transmission Plan considering various loading conditions. All new transmission proposals are duly approved by the Hon'ble Commission through the Transmission Planning, Business Plan, and Investment Proposal approval process, wherein DISCOMs and the State Government are among the respondents.

Further, consultations are held with stakeholders through Transmission and Distribution Coordination Committee (TDCC) meetings, Grid Coordination Committee (GCC) meetings, and meetings at the Government level to ensure the optimal utilization of OPTCL's transmission system.

Rejoinder to Para 31:

OPTCL always executes its projects which are either approved in Business Plan of OPTCL or Intra State Transmission Plan. As per the license conditions, OPTCL is mandated to take prior approval of Hon'ble Commission for any transmission projects above Rs. 10 Cr. which OPTCL has been following scrupulously.

Rejoinder to Para 32:

Transmission loss in OPTCL is computed based on the Pool Cost data received from GRIDCO and the Energy Flow Statement issued by SLDC, both of which are prepared using data recorded by energy meters.

Rejoinder to Para 33:

Some of the innovative technologies adopted in OPTCL as under:

- OPTCL has successfully implemented digital substation technology at the 132/33 kV Agalpur–Rampur GSS, wherein fiber optic cables are used in place of conventional copper control cables to transmit current, voltage and control signals digitally. In this system, loss-causing copper elements are eliminated and replaced with fiber optics. Such incremental technological improvements collectively contribute to the reduction of transmission losses.



- Further, OPTCL is continuously replacing existing conductors in transmission lines, where thermal loading is approaching limits, with High Temperature Low Sag (HTLS) conductors, which have lower resistance compared to conventional ACSR conductors.

- On an experimental basis, OPTCL has installed a Fiber Optic Current Transformer (FOCT) at Chandaka GSS, thereby eliminating the need for conventional current transformers.

- Furthermore, OPTCL is augmenting age-old transformers with new, energy-efficient transformers, replacing old conductors with new ones, converting radial lines into ring mains, and upgrading single-circuit (S/C) lines to double-circuit (D/C) lines. All these measures collectively result in an overall reduction in transmission losses.

Rejoinder to Para 34:

The following outlines OPTCL's step-by-step Cyclone Mitigation Plan for Odisha's transmission & distribution network. It addresses Commission directives on adequate spares, Emergency Restoration System (ERS), mobile substations, and faster restoration following cyclones.

STEP-BY-STEP CYCLONE MITIGATION PLAN

Governance & Activation:

a) Overall command during a cyclone emergency rests with the Incident Commander, normally the CMD or Managing Director of OPTCL. Sr. General Manager of each zone control field operations, while the State Load Despatch Centre provides real-time grid coordination.

b) This command structure is activated the moment the India Meteorological Department (IMD) issues a cyclone watch or warning. A watch triggers a pre-impact alert; a warning of landfall within forty-eight hours or confirmed multi-tower failures escalates the plan to full mobilisation.

c) State Government bulletins and ground observations supplement the IMD alerts.

Pre-season Preparedness:

a) Every year between January and March, before the cyclone season begins, OPTCL updates a detailed coastal risk map covering a sixty-kilometre buffer from the shoreline. Priority circuits and substations are listed in the Power Atlas and circulated internally.

b) All two strategic depots—Mancheswar and Chatrapur—are audited to verify the availability of Emergency Restoration System (ERS) towers, spare transformers of various MVA ratings, extra-high-tension conductors, insulators, diesel-generator sets and de-watering pumps. Inventory is replenished to maintain at least a 5% maintenance buffer.

c) During this period, right-of-way corridors are cleared and trees trimmed, short-span interpositions are inspected, and a full functional check is performed on SCADA, OPGW, VSAT and satellite-phone links. Round-the-clock control rooms are tested to ensure operational readiness.

Pre-impact Measures:

a) Once the IMD issues a watch or warning, the Incident Commander issues a formal mobilisation order. This specifies the ERS kits, cranes, truck-mounted 33 kV mobile substations, spare transformers and diesel generators required for each corridor, along with designated staging points.

b) Crews, equipment and at least one ERS kit per priority corridor are moved to pre-cleared rally points, with police and forest permits already in place. Rate-contract gangs are activated.

c) Where necessary, the grid is reconfigured or islanded in advance to reduce cascade risk and to preserve supply to critical facilities such as hospitals, water-supply systems and telecom nodes.

During the Cyclone:

1. Safety is paramount. Field work is suspended whenever sustained wind speeds exceed safe operating limits, and all on-site activity resumes only with clearance from the Safety Officer.
2. Control rooms remain staffed around the clock. SCADA and VSAT systems continue to provide live status updates, and hourly situation reports are transmitted to the State Load Despatch Centre.

Immediate Restoration (First 72 Hours):

I. Within six to twelve hours of landfall—once conditions allow—assessment teams use drones and ground patrols to identify and geo-tag damage. ERS towers are deployed rapidly to bypass collapsed structures and to re-establish ring feeds, giving priority to feeders that supply hospitals, water works and essential communications.

II. If ERS deployment alone cannot restore local grids, truck-mounted 33 kV mobile substations are sent to key district hubs within the sixty-kilometre coastal belt. Diesel generators pre-installed at substations provide auxiliary power to support these operations and enable permanent repairs.

Nalas Celestor Bosco

Medium-Term Recovery (Up to 14 Days):

10. Temporary ERS installations are replaced with permanent towers and foundations designed for Wind Zone VI conditions. Conductors are re-strung and insulators—preferably long-rod or silicone composite for saline environments—are repaired or replaced. Transformer and other high-tension equipment are inspected and restored.
11. Depots are immediately replenished and purchase orders raised to replace used ERS components, conductors and insulators. All regulatory incident reports and applications for State and National Disaster Response Funds are filed as required.

Long-Term Mitigation:

15. Beyond immediate restoration, OPTCL continues to strengthen the network. The DRPS Phase II programme accelerates underground cabling of the most vulnerable urban and coastal corridors and upgrades overhead lines with shorter spans and higher wind-rated towers.
16. A permanent fleet of 33 kV truck-mounted mobile substations will be procured and stationed at DRC hubs so that each coastal division has dedicated rapid-response capacity. An ERS Division—headquartered in Bhubaneswar is being institutionalized to maintain equipment, conduct training and manage mutual-aid agreements with neighbouring utilities and POWERGRID for cranes and heavy hardware.

Capacity Building and Oversight:

13. All ERS crews undergo annual table top and field drills, including full tower erection and mobile-substation commissioning. Weekly patrols, thermo-vision inspections and safety audits are mandated for coastal towers, and results are logged centrally.
14. Recently a five-day mock exercise on the erection of 400 kV ERS towers and stringing of ACSR Twin Moose Conductor was conducted near Bhubaneswar Baliyatra Ground. The program was designed as a refresher and capacity-building initiative, enabling OPTCL engineers to gain hands-on exposure to ERS tower components, erection procedures, and stringing operations. This exercise not only helped in familiarization and skill enhancement but also strengthened the preparedness of field engineers to effectively respond during exigencies and restoration scenarios.

15. During any event, daily restoration reports are sent to the Odisha Electricity Regulatory Commission and the State Disaster Management Authority, followed by a formal after-action review within seven days.

Regarding design of Multi circuit tower

OPTCL has already standardized the design of multi-circuit towers. At present, such towers are being used in the 220 kV Pandiabil–Samangara transmission line. Further, in many upcoming projects, wherever required, multi-circuit towers are planned to be adopted.

2. The objections not specifically admitted may be deemed to have been denied.

PRAYER

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of M/s. Visa Steel Limited while approving ARR and Transmission Tariff of OPTCL for FY 2026-27 & Truing up application for the FY 2024-25.

By the Applicant
Through

Bhubaneswar
January 27, 2026

Sr. GM (El.), RT&C

NOTARY GOVT. OF ODISHA

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Annexure-01

ODISHA ELECTRICITY REGULATORY COMMISSION
BIDYUT NIYAMAK BHAWAN
PLOT NO.4, CHUNOKOLI, SHAILASHREE VIHAR,
BHUBANESWAR - 751021
TEL. No. 2721048, 2721049, FAX: 2721053/2721057
E-mail: orierc@gmail.com
Website: www.orierc.org

****

No. DIR (T)-332/2008/ 177
Dt. 01.02.2021

To

The Managing Director,
OPTCL,
Janpath, Bhubaneswar-22.

Sub: Billing procedure consequent upon implementation of new Open Access Regulations, 2020.

Ref: Your letter No. RT&C-47/2020/18(3) dt.08.01.2021.

Sir,

In inviting a reference to the subject mentioned above, it is to intimate you that transmission tariff of OPTCL is governed under OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 which is still in force.

Regulation 6.5 of Transmission Tariff Regulation, 2014 states as follows:

*"**Transmission Tariff:** The Transmission Tariff payable by the Beneficiaries of the Transmission System shall be designed to recover the Aggregate Revenue Requirement approved by the Commission for each year of the Control Period."*

Regulation 2.1(h) of the same Regulation states that a distribution licensee shall necessarily be a long term transmission customer for which it shall be required to enter into a transmission service agreement with the transmission licensee.

Aggregate Revenue Requirement of the transmission licensee is recovered from the beneficiaries DISCOMs who are long term open access customers. The Commission carryout true up exercise under the same Regulation basing on the actual expenses booked in the audited books of the account of the transmission licensee for the year and expenses allowed in the ARR for the corresponding financial year. Therefore, the approved ARR of the transmission licensee is well taken care of for any short fall on this account. The STU has entered into transmission service agreement with the DISCOMs accordingly.

O/C

The Open Access Regulation, 2020 stipulates that the open access customer who wishes to avail open access under that Regulation shall have to apply for the same. DISCOMs do not come under the same and are governed under Transmission Tariff Regulation, 2014 and consequential special transmission service agreement. The long term customer other than the DISCOMs shall come under OERC Open Access Regulation, 2020.

Therefore, you are required to follow OERC Transmission Tariff Regulation, 2014 scrupulously as long as it is in force.

Yours faithfully,

SECRETARY 1.2.2021

Annexure-02

सत्यमेव जयते

अखिल भारतीय विद्युत सांख्यिकी

All India Electricity Statistics

सामान्य पुनर्विलोकन 2025

(2023-24 के आंकड़े समाविष्ट)

General Review 2025

(Containing Data for the Year 2023-24)

भारत सरकार
विद्युत मंत्रालय
केंद्रीय विद्युत प्राधिकरण
नई दिल्ली
नवंबर 2025

Government of India

Ministry of Power

Central Electricity Authority

New Delhi

November 2025

(अधिनियम 2003 की धारा 73 (आई) एवं (जे) के तहत के. वि. प्रा. के दायित्व के पालन हेतु प्रकाशित)

(Published in fulfilment of CEA's obligation under Section 73(i) & (j) of the Electricity Act 2003)

Table 6.2
Regional Transmission Losses
Utilities
2023-24

Region	Energy Available in the Region (GWh)	Export to other Region (GWh)	Export to Nepal (GWh)	Export to Bangladesh (GWh)	Export to Bhutan (GWh)	Export to Myanmar (GWh)	Total Energy drawal by States/Utilities (GWh)	Transmission Losses (GWh)	Transmission Losses (%)
1	2	3	4	5	6	7	8	9 (2-3-4-5-6-7)	10((8/2)x100)
Northern Region	234996.97	3117.23	170.57	0.00	0.00	0.00	224302.97	7406.20	3.15
Western Region	332120.58	99896.14	0.00	144.00	0.00	0.00	221708.25	10372.19	3.12
Southern Region	212787.85	4758.03	0.00	0.00	0.00	0.00	200663.51	7366.31	3.46
Eastern Region	142021.92	55318.56	1254.36	7315.07	1330.61	0.00	70787.65	6015.68	4.24
North Eastern Region	19710.81	3117.64	0.00	1072.11	0.00	8.47	14746.36	766.23	3.89

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur
Bhubaneswar-751021

Case No: 121/2025
Filing No: 1

IN THE MATTER OF:

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022

...

Applicant

AND

M/s. Tata Steel Limited, Kalinganagar Industrial Complex, Duburi, JK Road, Dist-Jajpur, PIN-755026

...Respondent

Affidavit verifying the application

I, Shri Suman Kumar Sharma, Son of Sri Anil Kumar Sharma aged about 39 years, working as Head, Transmission & Distribution, Electrical Maintenance with M/s. Tata Steel Limited, Kalinganagar Project, Duburi, JK Road, Jajpur-755026 do hereby solemnly affirm and state as follows: -

1. That I am the Head, Transmission & Distribution, Electrical Maintenance of M/s. Tata Steel Limited and I am duly authorized to swear this affidavit on its behalf.
2. The statements made in the petition are based on information and I believe them to be true.

PLACE: Jajpur
DATE: 15.01.2026

LOKANATH ROUT ... GOVT ... JAJPUR ROAD ... JAJPUR

DEPONENT

ATTESTED
LOKANATH ROUT
NOTARY
JAJPUR ROAD
JAJPUR

Suman Kumar Sharma
Head (Electrical Maintenance)
Transmission & Distribution
Tata Steel, Kalinganagar

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur
Bhubaneswar-751021

Case No: 121/2025
Filing No: 1

IN THE MATTER OF:

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022.

...

Applicant

AND

IN THE MATTER OF:

M/s. Tata Steel Limited, Kalinganagar Industrial Complex, Duburi, JK Road, Dist-Jajpur, PIN-755026

...Respondent

The humble respondent above named most respectfully submit as under:

1. That M/s. Tata Steel Limited, a company incorporated under the provisions of the Companies Act, 1956 having its Registered Office at Bombay House, 24-Homi Mody Street, Fort, Mumbai 400001 and plant site-cum-correspondence office at Kalinga Nagar Industrial Complex, Duburi, JK Road, Jajpur 755026 hereinafter referred as "TSL" / "Respondent".

2. That TSL has set-up 3 Million Ton per Annum capacity in the first phase and is in the process of second phase expansion of the Integrated Steel Plant to increase the - production capacity to 8 Million Ton per Annum. The Respondent's plant is connected with the New Duburi Grid Substation of OPTCL having a Contract Demand of 200 MVA at EHT supply system.

Suman Kumar Sharma
Head (Electrical Maintenance)
Transmission & Distribution
Tata Steel, Kalinganagar

3. That the Respondent Industries under the purview of the Licensee is under Mega Steel Plant Category where electrical power contributes substantially towards the cost of production.

4. TSL is submitting the following points on the application of OPTCL for determination of Annual Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 for kind review and necessary action by the Hon'ble Commission.

5. **Determination of Transmission Charges**

OPTCL has given the proposal for transmission charges @ **35.61 P/U** for FY 2026-27 against 25.5 P/Unit as approved by the Commission during FY 2025-26. The proposed Transmission Tariff of **35.61 P/U** is very high and should not be permitted. This will adversely affect the RST of the DISCOMS and will be a huge burden on the consumers of Odisha.

6. The proposal by OPTCL to disallow the rebate on prompt payment for Open Access customers, particularly Long & Medium-Term Open Access customers, needs to be carefully reviewed in the context of its impact on customer relations, operational efficiency, and regulatory guidelines.

While OPTCL has cited that there is no provision for rebate for early payment in the Open Access Regulations of 2020, the previous practice of offering a 2% rebate for payments made within two days was beneficial in encouraging timely payments and improving the cash flow for OPTCL. Discontinuing this rebate may have adverse effects on the payment behavior of Open Access customers, leading to potential delays in payment and reduced financial liquidity for OPTCL.

It is also essential to consider the implications of such a move on the competitiveness and attractiveness of Odisha's transmission system to potential Open Access customers. Providing financial incentives, such as the prompt payment rebate, could serve as a mechanism to retain customers and ensure a smoother cash flow for OPTCL. Additionally, a shift in policy might need to be discussed and approved by the Commission to ensure it aligns with the broader regulatory framework and customer service goals. In light of these factors, it is proposed that OPTCL may reconsider the discontinuation of the rebate, or alternatively, propose a revised rebate structure that balances the financial interests of both OPTCL and its Open Access customers. The Commission's input and further deliberation on the matter may be necessary to ensure that the policy is fair, transparent, and in the best interest of all stakeholders.

7. The Open Access Regulations, 2020 treat the DISCOMs and other Open Access users like CGP, and Industrial Consumers on the same footing. However, exceptions is

Suman Kumar Sharma
Head (Electrical Maintenance)
Transmission & Distribution
Tata Steel, Kalinganagar

being carved out, wherein the DISCOMs need not submit their contracted quantity and are allowed to pay Transmission Charges on the actual energy transacted, whereas the other OA customers like CGPs, Industries are being forced to pay the Transmission Charges on the Contracted Quantity. Further, OPTCL has proposed to do away with the prompt payment rebate for OA customers like CGPs and Industries while allowing the prompt payment rebate benefit to DISCOMs. This type of differential treatment is against the Open Access Regulation, Grid Code, and statutory provision under the Electricity Act 2003. Therefore, it is requested that the Commission to treat all the Transmission Users i.e. CGPs, Industries, and DISCOM on the same footing with provision for charges, and rebates on the same principle without any discrimination.

8. Transmission Loss:

OPTCL has proposed transmission loss at 3.05%. In conformity with the power sector reform, OPTCL needs to reduce the transmission loss significantly. We propose to approve transmission loss of OPTCL at 2.5%.

That OPTCL has not yet identified the areas where loss is maximum and OPTCL needs to formulate action plans for loss reduction. OPTCL should inform the methodology adopted to estimate the transmission loss for every year. OPTCL should have undertaken energy audits of lines and substations to know the quantum of transmission loss in the system. Proposing the transmission loss arbitrarily without giving the breakup of the losses in different components of transmission system i.e., lines, substations, power transformers and auto transformers etc. are not appropriate for the S.T.U. Thus, proposing loss as per the business plan is meaningless. There is enough measure by which OPTCL could reduce the Transmission loss. OPTCL should conduct energy audits and their standard performance should be monitored by a third party auditor appointed by the Commission so as to assess the actual performance of the licensees.

It is prayed before the Hon'ble Commission may kindly re-calculate and approve transmission loss accordingly.

9. That earlier CGPs used to inject inadvertent power to the grid and GRIDCO availed the benefits of inadvertent power. GRIDCO also used to pay the hydro pool cost towards the inadvertent power. However, from FY 2019-20 onwards GRIDCO has stopped making payment towards inadvertent injections. Hence, OPTCL became the ultimate beneficiary of such injection of inadvertent power. We pray to the Hon'ble Commission to direct OPTCL to submit the detailed list of inadvertent injection for each month by each CGP and consider the same as an additional injection to the grid accordingly to calculate the transmission loss. The data of inadvertent injection is available with OPTCL and SLDC for each month for each CGP who are connected to EHT transmission system of OPTCL. The entire stakeholder and consumers of Odisha will be

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Transmission & Distribution
Tata Steel, Kalinganagar

benefitted by such methodology as the intra-state transmission loss will reduce significantly.

10. Given the significance of maintaining transparency and accuracy in the transmission system's performance, it is requested that OPTCL conduct a Third-Party Energy Audit of its transmission loss. The energy audit should be carried out by an accredited energy auditor in line with the guidelines specified by the regulatory authorities.

The requirement to conduct an annual energy audit is crucial not only for assessing transmission losses but also for identifying potential inefficiencies and implementing corrective actions that can help in optimizing the system's overall performance. This audit will provide an independent, unbiased evaluation of the transmission system's energy losses and help in formulating strategies for loss reduction, which will ultimately contribute to improving the operational efficiency and financial health of OPTCL.

11. Open Access Charges:

Each year Hon'ble OERC informed OPTCL to submit 400 kV, 220 kV, 132 kV Power Transformer and EHT lines loading. OPTCL should make a practice to submit the Power flow data for 400 kV, 220 kV line and 132 kV line and its loading and the entire Auto-transformer loading, Power Transformer and ICT loading along with the ARR application. Moreover, by submitting only power transmitted on the peak demand day will not solve the purpose. In order to ascertain the margin availability, OPTCL may be directed to submit the maximum power handling capability, power flow and % loading of all the 400 kV, 220 kV, 132 kV line and Power Transformer, Auto Transformer, ICT Transformers. It is also desired that OPTCL should conduct load flow analysis to handle around 2000-3000 MW differential load in appropriate manner.

Once these data are made available, it can be ascertained that, there are sufficient margin is available in the transmission network and in order to utilize it fully, STOA should be promoted and the charges for the same may be kept at 1/4 of the MTOA and LTOA charges and necessary amendments in the regulations may be made.

12. Introduction of Reactive Energy Charges:

OPTCL has proposed to introduce Reactive Energy Charges of 3 Paise / kVARh which is very high and should be reduced in consultation with various stakeholders.

13. Levy of Grid Support Charge for connectivity:

OPTCL has submitted an application to the Hon'ble OERC on 26.06.2024, to determine and approve the imposition of Grid Support Charges for industries with Captive Generating/Cogeneration plants that operate alongside the OPTCL grids.

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The case was registered as OERC Case No.-44/2024. In an order dated July 6, 2023, the High Court suggested that if OPTCL wishes to pursue the imposition of Grid Support Charges, they should file a separate application with the OERC. The court emphasized that the OERC, under Section 181 of the Electricity Act, should examine the justifiability of such charges. Hon'ble Commission in order dated 09.07.2024 in case no 44 of 2024 has directed OPTCL to submit a consolidated report considering certain queries. OPTCL has submitted the report on 29.01.2025.

14. It is prayed before the Hon'ble Commission that the levy of Grid Support Charges (GSC) on Captive Generating Plants (CGPs) be abandoned. CGPs are operated by industries that already have a contract demand with the respective DISCOMs, which means they are contributing to the grid through their contracted capacities. The imposition of GSC on CGPs would lead to a scenario where industries are effectively being charged twice for grid support – once through their contract demand with DISCOMs and again via the proposed GSC.

This double charging would result in an unfair financial burden on industries that are already supporting the grid by paying for their contractual obligations. Such a practice could discourage further industrial investments in renewable energy projects, which is counterproductive to the state's objectives of promoting sustainability and industrial growth. Therefore, in the interest of fairness and to avoid unnecessary financial strain on industries, OPTCL should abandon the proposal to levy GSC on CGPs. This would ensure that industries are not unfairly penalized for their contribution to the grid, while also promoting the continued growth of renewable energy in Odisha.

15. OPTCL may be directed to submit the current status of the 765 kV transmission network plan, specifically for the two 765 kV ISTS lines: Angul to Gopalpur and Angul to Paradeep, as well as the status of the 765 kV substation in the Kolabira and chadeidhara area. In addition, OPTCL should provide detailed updates on the progress of 400 KV transmission network such as the, , Ersama (Paradeep), and New Duburi GSS.

16. Transmission business being a capital-intensive project requires long term planning. Therefore, Hon'ble OERC may direct OPTCL to submit MYT (Multi Year Tariff) and long term Business Plan based on which Investment Plan should be provided.

17. That Intrastate transmission system should be developed in a coordinated manner in consultation with CTU, State govt., Generating companies, Regional Power Committees, CEA & licensees. However, such grid coordination meetings are not happening regularly. It is proposed that the grid coordination committee meeting may be conducted regularly. Nos of industries are facing lots of difficulties in getting grid connectivity and enhancement of contract demand. Even the honorable OERC has directed to hold a meeting of OPTCL with DISCOM on a monthly basis to ensure smooth operation of the power sector and MOM to be furnished to OERC. The honorable OERC in its earlier transmission tariff order dated 13.02. 2024 in case no. 113/2023 has

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directed to submit the revised 14th inter-state transmission plan of OPTCL for approval. OPTCL may kindly submit the status of the 14th inter-state transmission plan of OPTCL and stage wise implementation plan.

18. The Hon'ble OERC has published the OERC (Development of Intra-State Transmission Projects through Tariff Based Competitive Bidding in the State of Odisha) Order, 2022. OPTCL may be directed to submit an action taken report towards execution of new transmission projects. The honorable OERC has earlier directed OPTCL to standardize the transmission line tower, multi-circuit tower etc. the honorable OERC may pass appropriate order.

19. OPTCL should make a standard practice to prepare its ARR application and insert these regular features during the ARR application stage considering all relevant query of Hon'ble OERC. This will be quite helpful for the Respondents as well as for the officials of Hon'ble OERC for conducting proper analysis and scrutiny.

20. OPTCL should be directed to consider the meter data to assess the month-wise transmission loss in intra-state transmission systems including losses at different voltage levels (i.e., 132 kV, 220 kV and 400 kV levels).

21. The power utility has proactively implemented multiple loss reduction strategies, including system automation, load bifurcation, and digitization of the grid. Despite these extensive efforts, the anticipated loss reduction has not been realized, proving that systemic challenges persist beyond mere technical upgrades. Load bifurcation improves local reliability, but its impact on overall transmission loss is minimal, as power still needs to travel long distances from generation to consumption points. The introduction of ring systems instead of radial networks has increased network stability and redundancy, but transmission losses are still governed by physical distance and resistance of the conductors. Advanced transformers and low-loss conductors have been introduced, yet their impact on overall losses will be realized only after complete replacement of old equipment across the entire network. Bay control units (BCUs) and digital substations provide enhanced monitoring and real-time control over power flow, reducing inefficiencies. However, these tools primarily assist in identifying losses rather than eliminating them outright. Their full impact will be seen once corrective actions are consistently implemented over a longer duration.

22. It is proposed that Cyclone resilient robust electricity transmission and distribution infrastructure in coastal areas should be established by OPTCL. OPTCL may be directed to submit a report on how many mobile substations are available with them to meet the contingency situation during cyclone and their cyclone mitigation plan which has been earlier directed by honorable OERC. OPTCL has not taken action for the design of multi-circuit and multi voltage transmission lines. MOP document on reduction in ROW in urban and forest areas.

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23. We request the Hon'ble Commission to kindly allow the Respondent to submit any additional submissions, memos, documents etc. as may be required and in general do all such things as may be required in connection with the above reply.

PRAYER

In the facts and circumstances stated above and in the interest of the parties and the larger interest of the State the Hon'ble Commission be pleased to pass appropriate orders to the effect that

1. The Transmission Charges should be reviewed and reduced substantially.
2. Transmission loss to be reduced considering the submission made for FY 2026-27.
3. Proposal of Reactive energy charges of 3 paise/KVARh should be reduced.
4. Proposal of OPTCL to levy of Grid Support Charge for connectivity may be rejected.

Place: Jajpur

Date: 15.01.2026

For M/s. Tata Steel Limited

Authorized Signatory

Suman Kumar Sharma
Head (Electrical Maintenance)
Transmission & Distribution
Tata Steel, Kalinganagar

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur
Bhubaneswar-751021

Case No: 121/2025
Filing No: 1

IN THE MATTER OF:

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022

...

Applicant

AND

M/s. Tata Steel Limited, Kalinganagar Industrial Complex, Duburi, JK Road, Dist-Jajpur, PIN-755026

...Respondent

Letter of Authorization

I, Shri Suman Kumar Sharma, Son of Sri Anil Kumar Sharma aged about 39 years, working as Head, Transmission & Distribution, Electrical Maintenance with M/s. Tata Steel Limited, Kalinganagar Project, Duburi, JK Road, Jajpur-755026 hereby authorize Sri Bibhu Swain, residing at K-8-82, Kalinga Nagar, Ghatikia, Bhubaneswar-751029 to be my representative to present the above case on my behalf before the Hon'ble Odisha Electricity Regulatory Commission relating to my above reply and to submit any additional submission, memos, documents etc. as may be required and in general do all such thing as may be required in connection with the above reply.

For M/s. Tata Steel Limited

Place: Jajpur

Date: 15.01.2026

Authorized Signatory

Suman Kumar Sharma
Head (Electrical Maintenance)
Transmission & Distribution
Tata Steel, Kalinganagar

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
PLOT NO. 4, SAILESHREE VIHAR,
CHANDRASEKHARPUR, BHUBANESWAR-751021

CASE NO. 121/2025
FILING NO. 3

IN THE MATTER OF: (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

And

(ii) Truing up application for the FY 2024-25 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

AND
IN THE MATTER OF: Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

..... Applicant

vrs

M/s. Tata Steel Limited, Kalinganagar Industrial Complex, Duburi, JK Road, Dist-Jajpur, PIN- 755026 and **16 others.**

..... Objectors

Rejoinder to the objections raised by the Objector M/s. Tata Steel Limited, Kalinganagar.

The humble applicant above named

MOST RESPECTFULLY SHEWETH:

1. That, the Objector M/s. Tata Steel Limited, Kalinganagar vide affidavit dated 16.01.2026 has raised certain submissions on ARR & Transmission Tariff Application of

M/s Tata Steel

OPTCL for FY 2026-27 and Truing up application for FY 2024-25. In reply, OPTCL submits its rejoinder to the submissions in the following paragraphs.

Rejoinder to Para 5:

Determination of Transmission Charges:

The Transmission infrastructures are created considering the demand and request of the DISCOMs / Industries from time to time, after due approval form the Hon'ble OERC through Transmission Plan. Being a Deemed Transmission License, OPTCL has always endeavored to create the Transmission infrastructure for providing reliable and quality power to the consumers of DISCOMs. Accordingly, every year OPTCL is adding more transmission assets to meet the requirement of DISCOMs. Transmission Charge is arrived at 35.61 paise per unit by dividing the total ARR of OPTCL with the recent realistic MU projections of DISCOMs and recovered from them on a monthly basis. This rate will decrease if DISCOMs drawal increases. In fact, OPTCL has consistently advocated for the recovery of transmission charges based on contracted capacity, in line with the practice followed by STUs in other states.

The proposed Transmission Charge of 35.61 p/u has been derived by considering the recent realistic energy demand projections of 41,849.28 MU as communicated by the DISCOMs & other LTOA customers and the ARR figures have been arrived by OPTCL justifying component wise projections as per the provisions contained in OERC Transmission Tariff Regulations, 2014, OPTCL's Audited Accounts for FY 2024-25, all relevant data/information and materials. The details of projections are submitted in page 30 of the present ARR application of OPTCL for FY 2026-27. Moreover, OPTCL had furnished all requisite information and details as per the prescribed formats of the Hon'ble Commission with full justifications.

Hence, mere apprehension of the respondent towards imposition of excessive burden on Discoms seems to be inappropriate and unacceptable which is likely to be rejected at this juncture. Moreover, the contention of the stake holder operating in the value chain of electricity needs to appreciate the fact that the cost recovery has to be in full so as to make the sector sustainable.

Rejoinder to Para 6 & 7:

The Hon'ble Commission vide letter no. DIR (T)-332/2008/77 dated 01.02.2021 has clarified that the DISCOMs do not come under the new regulation "OERC (Terms and conditions of Intra state open access) Regulations 2020" and they are governed under OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014. A copy of the said letter is provided as **Annexure-01.** Further, the

details of provision of Rebate have been meticulously mentioned in page no: 59 of our ARR application for FY 2026-27 as per the said OERC Regulations.

Rejoinder to Para 8-10:

Transmission Loss

The arguments for transmission loss of OPTCL at 2.5% is without any justification. The actual transmission loss for the period **Apr' - Sep' 2025** is calculated to be **3.07%** as shown in the ARR & TT application for FY 2026-27 (page-205). This figure is **less than the actual** transmission loss during last year **i.e. 3.09%** for **FY 2024-25.** In fact, OPTCL had projected a Transmission loss of 3.05% for FY 2025-26, but Hon'ble Commission had set a target of 3.00% which could not be achieved yet.

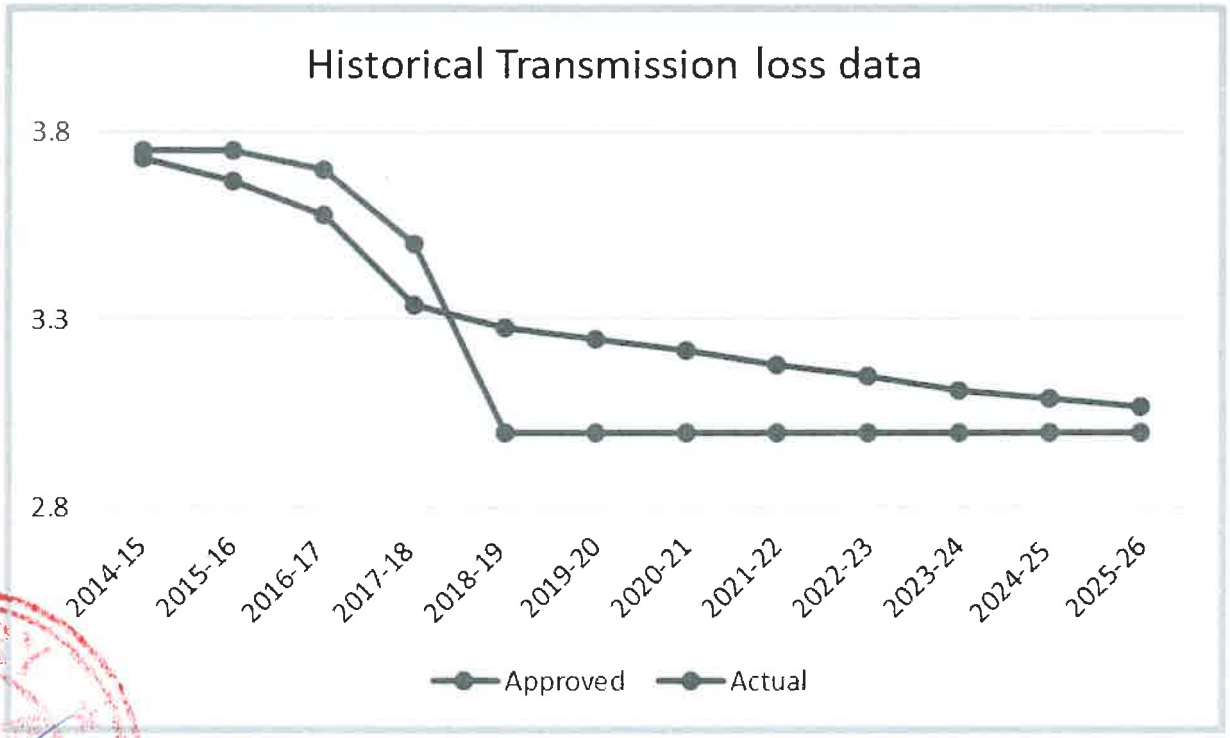
In OPTCL system, the transmission loss is purely technical loss and a function of real time injection of power by a number of generators, system configuration and power flow requirements at different load centers. It depends on many parameters / factors such as distance and mismatch between generation and load centers, types of load, reactive power compensation, voltage profile, seasonal variation of demand load etc. Thus, OPTCL does not have much control over the same at any point of time. The transmission system of OPTCL operates as an integral part of the Eastern Region Grid to serve the internal demand of the State as well as to carry out import and export of power depending upon the system demand.

As a matter of fact, some grid s/s and lines are being constructed in many remote and deprived areas funded under Central & State Govt. schemes in the interest of public. Additional length in EHT lines and Sub-stations in under-loaded areas are also responsible for increase in transmission loss.

Transmission Loss in OPTCL network is in a gradually reducing trend over the years i.e. from 3.73% during 2014-15 to 3.09% in 2024-25 and has remained 3.07% within 1st six months of FY 2025-26 mainly due to addition of infrastructure and various system strengthening works taken up by OPTCL. The actual losses incurred over the years by OPTCL have been within the margin allowed by Hon'ble Commission up to the year FY 2017-18. However in FY 2018-19, the commission set the loss at 3.00% though the projected transmission loss was at 3.25% and thereafter the commission has been pegging the transmission loss at the same level though loss projected by OPTCL remained in a downward trend.

NOTARY GOVT. OF ODISHA

Year	Tr. Loss proposed	OERC Approval	Actual
2014-15	3.75%	3.75%	3.73%
2015-16	3.75%	3.75%	3.67%
2016-17	3.70%	3.70%	3.58%
2017-18	3.50%	3.50%	3.34%
2018-19	3.25%	3.00%	3.28%
2019-20	3.25%	3.00%	3.25%
2020-21	3.20 %	3.00%	3.22%
2021-22	3.15%	3.00%	3.18%
2022-23	3.10%	3.00%	3.15%
2023-24	3.10%	3.00%	3.11%
2024-25	3.05%	3.00%	3.09%
2025-26	3.05%	3.00%	3.07% (1st six months)



From the table given above, it is also clear that each year upto FY 2017-18, the transmission loss achieved by OPTCL has remained at a level lower than the approved figures by Hon'ble commission and from FY 2018-19 the target set by Hon'ble OERC appears to be very stiff which was hard to achieve though the trend of lesser transmission loss year after year has been achieved.

It may kindly be appreciated that transmission (technical) losses are inevitable in power systems due to the fundamental laws of physics and become increasingly difficult to reduce beyond a certain threshold. Further, at the all-India level, transmission losses across different regions have consistently remained above 3.12%. To substantiate our viewpoint, the transmission loss data for various regions is presented below for the kind consideration of the Hon'ble Commission.

Transmission loss of Different Regions for FY 2023-24

Region	Transmission loss
Northern Region	3.15%
Western Region	3.12%
Southern Region	3.46%
Eastern Region	**4.24% (Odisha- 3.11%)**
North Eastern Region	3.89%

(Courtesy: General Review 2025, Government of India, Ministry of Power, CEA attached as **Annexure-02**)

It may be observed that OPTCL's transmission loss of 3.07% is lower than the average transmission losses of all regions.

However, as a responsible Transmission utility, OPTCL is making an all-out effort to reduce the transmission loss further by undertaking various **system operation and loss reduction measures** by implementing the emerging technologies like **system Automation**, load bifurcation, **modification in system configuration**, procurement of more efficient equipment, **Digitalization of grids** by using SAS, Protection system improvement using Busbar protection and Event Logger, Advanced Metering Infrastructure, **Conversion of Radial to Ring system,** construction of GSS at **higher voltage levels** (220kV & 400kV), Replacement of old conductors and Transformers etc. to bring it to **3.05% by FY 2026-27.**

Steps taken for Energy Audit

Under the PSDF funding, SLDC is implementing the SAMAST project. After operational of SAMAST project, detailed energy auditing is possible.

Regarding inadvertent power

CGPs are not firm sources of power as they are essentially meant for the captive consumption. OPTCL does not agree to the assumption of the respondent that around

985MU of inadvertent power will be injected into the OPTCL system in a year considering the CGP capacity 9850MW.From the Pool Cost data provided by GRIDCO for the first six months of FY 2025-26, it is observed that the total inadvertent power injection is 230.643MU which has been already considered while calculating the Transmission loss of 3.07% in form T-6. Hence, Transmission loss as suggested by the Objector is not just and proper. Details of inadvertent power injected by CGPs in FY 2025-26 till September is furnished as under:

Month	**Quantum of inadvertent power (MU)**
April-25	38.31
May-25	38.79
Jun-25	39.97
Jul-25	30.39
Aug-25	43.27
Sep-25	39.92
Total	**230.64**

Further, it is submitted that Transmission charge is being computed on Open access transactions based on scheduled energy. Hence, OPTCL does not reap any benefit out of inadvertent power.

Rejoinder to Para 11:

Open Access Charges:

The system peak demand of **7069.89 MW** was touched on 12.08.2025 at 24:00 Hr. Statement on the loading pattern of the existing transmission system (400kV, 220kV & 132kV EHT lines along with loading on ICT, Auto & power transformers) corresponding to the peak demand is submitted in compliance to the OERC queries on ARR application of OPTCL for FY 2026-27 which will submitted to your good self along with this reply. OPTCL has already conducted load flow study considering different load scenarios i.e. Summer peak, Winter lean, High hydro, Low Hydro & Solar Peak in the Revised 14th Intra-state Transmission Plan of Odisha for FY 2022-23 to FY 2026-27, which has been duly approved by Hon'ble Commission vide case no. 08/2024. In the said report, percentage loading of all Transmission lines, ICTs, Auto & Power Transformers till FY 2026-27 have been mentioned. The Transmission infrastructures

are being created considering the demand and requests of the DISCOMs/Industries from time to time after due approval form the Hon'ble OERC through Transmission Plan. DISCOMs and other LTA customers are responsible to bear the full approved ARR of OPTCL. STOA charge is being charged as per the Open Access Regulations, 2020.

Further, the revenue earned from STOA transactions is accounted for under Miscellaneous Income and is ultimately deducted from the Gross ARR to arrive at the net recoverable transmission charges to be recovered from consumers, including DISCOMs. Therefore, application of the 1/4th concept would result in an additional burden on domestic consumers. Further, as per CERC regulations, the STOA rate is comparatively higher than LTA.

It is pertinent to mention that LTA consumers enjoy the first right and greater benefits compared to MTOA and STOA consumers. Therefore, for industries seeking a reliable, quality, and uninterrupted power supply, availing Long-Term Access (LTA) remains one of the most suitable options.

Rejoinder to Para 12:

Reactive Energy Charges:

As per Regulation 31(1) under Chapter-7 (IMBALANCE AND REACTIVE ENERGY CHARGES) of the OERC (Terms and Conditions of Intra-State Open Access) Regulations, 2020, payment for the reactive energy charges by open access consumers shall be in accordance with provisions stipulated in the State Grid Code or as may be specified in relevant regulations/orders of the Hon'ble Commission .

The Hon'ble Commission in Para 16 (page 5) of the order dated 05.02.2019 in Case No. 50/2017 has inter alia viewed that the provisional reactive energy charges of 3 paise/KVArH as allowed in the ARR order of OPTCL for FY 2018-19 continue for time being till a final justification is submitted by OPTCL in consultation with the stakeholders. However, despite raising reactive energy bills by SLDC since the beginning of FY 2025–26, no amount has been received in the Reactive pool account against Reactive Energy Charges to date due to non-payment by DISCOMs and other LTOA customers.

In view of the above, OPTCL proposes that 3paise/KVARh may be approved provisionally as Reactive Energy Charges for FY 2026-27.

Hence, the proposal of the objector to reduce the reactive energy charges as suggested by OPTCL is not just and proper.

Rejoinder to Para 13 & 14:

Levy of Grid Support Charge for connectivity:

The benefits derived by the CGPs with co-located loads are enormous. The benefits are in the nature of ancillary services which are not paid till now. The Grid support charges (GSC)/Parallel operation charge has been levied by different state Regulatory Commissions and upheld by APTEL and Supreme Court of India through various orders and hence proposed by OPTCL through a separate petition. OPTCL had filed an application (case No. 44 of 2024) on 26.06.2024 for determination and approval for levy of Grid Support Charges for industries having Captive Generating / Cogeneration plants and running in parallel with the Grids of OPTCL. Hon'ble Commission vide its order in case no. 44/2024 directed OPTCL to submit a consolidated report considering the observations/queries raised by the stakeholders in the earlier Cases filed by OPTCL. In compliance to above, OPTCL has filed the requisite report before Hon'ble Commission on 29.01.2025.

Further, it is submitted that a consumer connected to OPTCL network, pays demand charges for the contracted demand to concerned DISCOMs[. The rationale behind this arrangement is that the corresponding quantum of transmission corridor capacity is reserved for the respective consumer, and only the remaining available capacity in the EHT network is allocated to other consumers. Moreover, it is observed that installed capacity of CGPs are much more than the contracted demand with DISCOMs.

However, it is observed that after synchronization with the grid, CGPs adversely impact grid quality through the injection of harmonics and other disturbances. To address such impacts and ensure grid stability, appropriate charges, namely Grid Support Charges, are required to be levied.

Further, it is submitted that OPTCL has proposed grid support charge factoring the contracted demand signed with DISCOMs by CGPs. So, double charging issue raised by the objector does not arise.

Rejoinder to Para 15:

Status of key Transmission projects is furnished below:
Project under ISTS

1. **765kV Angul – Gopalpur**
   a. Scheduled date of completion – December 2027.
   b. CERC yet to issue Transmission license to the L1 bidder under TBCB.

2. **765kV Angul – Paradeep**
    a. Scheduled date of completion – November 2026.

    b. CERC yet to issue Transmission license to the L1 bidder under TBCB.

Projects under OPTCL

1. **765kV Kolabira**
    - Approved under 21st CMETS-ER dated 22.08.2023
    - Land identification is in progress
2. **400kV Joda/Barbil (Basudevpur)**
    - Approved under 33rd CMETS-ER dated 05.08.2024
    - Land identification is in progress
    - Project will be executed by OPTCL upon finalisation of funding from Govt. and IP approval from Hon'ble Commission.
3. **400kV Ersama**
    - Scheduled date of completion – June 2026
4. **400kV Neulapoi**
    - Approved under 30th CMETS-ER dated 14.05.2024
    - Tender floated, work started

There is no provision of Capacity charges in the extant OERC Transmission Tariff Regulations, 2014. Since Gridco is procuring power through ISTS network, the transmission charges thereof is dealt by Gridco.

Rejoinder to Para 16:

It is intimated that the Business Plan of OPTCL for the 3rd Control Period, i.e., from FY 2024–25 to FY 2026–27, has been approved by the Hon'ble Commission vide Order dated 24.09.2025 in Case No. 20 of 2025.

Rejoinder to Para 17:

The Revised 14th Intra-State Transmission Plan of Odisha for FY 2022–23 to FY 2026–27 has been approved by the Hon'ble Commission vide Case No. 08/2024. Recently, the investment proposals for 37 projects were heard after inviting suggestions and objections from the general public.

Rejoinder to Para 18:

Initially construction of 400/220kV AIS S/S at Remuli along with associated lines was planned for TBCB . Subsequently, State Government after careful consideration have been decided to construct 400/220kV AIS S/S Remuli(at Basudevpur) and establishment of 2x160 MVA, 220kV GIS S/S at existing Barbil GSS along with associated 400kV & 220kV lines on cost plus method instead of TBCB mode.

Accordingly, at present, there is no proposal for execution of any project under TBCB mode.

OPTCL has standardized technical specifications for transmission line towers/steel poles, power transformers, switchgear, surge arresters, CTs, PTs/CVTs, conductors, insulators, fire fighting systems, lighting systems, AC/DC systems, etc., and continues to incorporate improvements as identified for further refinement

Rejoinder to Para 19:

The respondent's suggestion has been noted and OPTCL will include the details of loading pattern in the ARR filing of the coming years. Invariably, OPTCL has been sharing the details of loading pattern of all the ICTs, Auto & Power transformers in L-9 format (OERC approved format) as a part of ARR filing every year. Further, loading details corresponding to the maximum demand of **7069.89 MW** on 12.08.2025 has been provided in Compliance to the OERC queries on ARR application of OPTCL in case no. 121/2025.

Rejoinder to Para 20:

Transmission loss in OPTCL is computed based on the Pool Cost data received from GRIDCO and the Energy Flow Statement issued by SLDC, both of which are prepared using data recorded by energy meters.

Rejoinder to Para 21:

Some of the innovative technologies adopted in OPTCL as under:

- OPTCL has successfully implemented digital substation technology at the 132/33 kV Agalpur–Rampur GSS, wherein fiber optic cables are used in place of conventional copper control cables to transmit current, voltage and control signals digitally. In this system, loss-causing copper elements are eliminated and replaced with fiber optics. Such incremental technological improvements collectively contribute to the reduction of transmission losses.

- Further, OPTCL is continuously replacing existing conductors in transmission lines, where thermal loading is approaching limits, with High Temperature Low Sag (HTLS) conductors, which have lower resistance compared to conventional ACSR conductors.

- On an experimental basis, OPTCL has installed a Fiber Optic Current Transformer (FOCT) at Chandaka GSS, thereby eliminating the need for conventional current transformers.

- Furthermore, OPTCL is augmenting age-old transformers with new, energy-efficient transformers, replacing old conductors with new ones, converting radial lines into ring mains, and upgrading single-circuit (S/C) lines to double-circuit (D/C) lines. All these measures collectively result in an overall reduction in transmission losses.

Rejoinder to Para 22:

The following outlines OPTCL's step-by-step Cyclone Mitigation Plan for Odisha's transmission & distribution network. It addresses Commission directives on adequate spares, Emergency Restoration System (ERS), mobile substations, and faster restoration following cyclones.

STEP-BY-STEP CYCLONE MITIGATION PLAN

Governance & Activation:

a) Overall command during a cyclone emergency rests with the Incident Commander, normally the CMD or Managing Director of OPTCL. Sr. General Manager of each zone control field operations, while the State Load Despatch Centre provides real-time grid coordination.

b) This command structure is activated the moment the India Meteorological Department (IMD) issues a cyclone watch or warning. A watch triggers a pre-impact alert; a warning of landfall within forty-eight hours or confirmed multi-tower failures escalates the plan to full mobilisation.

c) State Government bulletins and ground observations supplement the IMD alerts.

Pre-season Preparedness:

a) Every year between January and March, before the cyclone season begins, OPTCL updates a detailed coastal risk map covering a sixty-kilometre buffer from the shoreline. Priority circuits and substations are listed in the Power Atlas and circulated internally.

b) All two strategic depots—Mancheswar and Chatrapur—are audited to verify the availability of Emergency Restoration System (ERS) towers, spare transformers of various MVA ratings, extra-high-tension conductors, insulators,

diesel-generator sets and de-watering pumps. Inventory is replenished to maintain at least a 5% maintenance buffer.

c) During this period, right-of-way corridors are cleared and trees trimmed, short-span interpositions are inspected, and a full functional check is performed on SCADA, OPGW, VSAT and satellite-phone links. Round-the-clock control rooms are tested to ensure operational readiness.

Pre-impact Measures:

a) Once the IMD issues a watch or warning, the Incident Commander issues a formal mobilisation order. This specifies the ERS kits, cranes, truck-mounted 33 kV mobile substations, spare transformers and diesel generators required for each corridor, along with designated staging points.

b) Crews, equipment and at least one ERS kit per priority corridor are moved to pre-cleared rally points, with police and forest permits already in place. Rate-contract gangs are activated.

c) Where necessary, the grid is reconfigured or islanded in advance to reduce cascade risk and to preserve supply to critical facilities such as hospitals, water-supply systems and telecom nodes.

During the Cyclone:

1. Safety is paramount. Field work is suspended whenever sustained wind speeds exceed safe operating limits, and all on-site activity resumes only with clearance from the Safety Officer.
2. Control rooms remain staffed around the clock. SCADA and VSAT systems continue to provide live status updates, and hourly situation reports are transmitted to the State Load Despatch Centre.

Immediate Restoration (First 72 Hours):

I. Within six to twelve hours of landfall—once conditions allow—assessment teams use drones and ground patrols to identify and geo-tag damage. ERS towers are deployed rapidly to bypass collapsed structures and to re-establish ring feeds, giving priority to feeders that supply hospitals, water works and essential communications.

II. If ERS deployment alone cannot restore local grids, truck-mounted 33 kV mobile substations are sent to key district hubs within the sixty-kilometre coastal belt.

Diesel generators pre-installed at substations provide auxiliary power to support these operations and enable permanent repairs.

Medium-Term Recovery (Up to 14 Days):

10. Temporary ERS installations are replaced with permanent towers and foundations designed for Wind Zone VI conditions. Conductors are re-strung and insulators—preferably long-rod or silicone composite for saline environments—are repaired or replaced. Transformer and other high-tension equipment are inspected and restored.
11. Depots are immediately replenished and purchase orders raised to replace used ERS components, conductors and insulators. All regulatory incident reports and applications for State and National Disaster Response Funds are filed as required.

Long-Term Mitigation:

15. Beyond immediate restoration, OPTCL continues to strengthen the network. The DRPS Phase II programme accelerates underground cabling of the most vulnerable urban and coastal corridors and upgrades overhead lines with shorter spans and higher wind-rated towers.
16. A permanent fleet of 33 kV truck-mounted mobile substations will be procured and stationed at DRC hubs so that each coastal division has dedicated rapid-response capacity. An ERS Division—headquartered in Bhubaneswar is being institutionalized to maintain equipment, conduct training and manage mutual-aid agreements with neighbouring utilities and POWERGRID for cranes and heavy hardware.

Capacity Building and Oversight:

13. All ERS crews undergo annual table top and field drills, including full tower erection and mobile-substation commissioning. Weekly patrols, thermo-vision inspections and safety audits are mandated for coastal towers, and results are logged centrally.
14. Recently a five-day mock exercise on the erection of 400 kV ERS towers and stringing of ACSR Twin Moose Conductor was conducted near Bhubaneswar Baliyatra Ground. The program was designed as a refresher and capacity-building initiative, enabling OPTCL engineers to gain hands-on exposure to ERS tower components, erection procedures, and stringing

operations. This exercise not only helped in familiarization and skill enhancement but also strengthened the preparedness of field engineers to effectively respond during exigencies and restoration scenarios.

15. During any event, daily restoration reports are sent to the Odisha Electricity Regulatory Commission and the State Disaster Management Authority, followed by a formal after-action review within seven days.

Regarding design of Multi circuit tower

OPTCL has already standardized the design of multi-circuit towers. At present, such towers are being used in the 220 kV Pandiabil–Samangara transmission line. Further, in many upcoming projects, wherever required, multi-circuit towers are planned to be adopted.

2. The objections not specifically admitted may be deemed to have been denied.

PRAYER

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of M/s. Tata Steel Limited, Kalinganagar while approving ARR and Transmission Tariff of OPTCL for FY 2026-27 & Truing up application for FY 2024-25.

By the Applicant
Through

Bhubaneswar
January 27, 2026

Sr. GM (El.), RT&C

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Annexure-01

ODISHA ELECTRICITY REGULATORY COMMISSION
BIDYUT NIYAMAK BHAWAN
PLOT NO.4, CHUNOKOLI, SHAILASHREE VIHAR,
BHUBANESWAR - 751021
TEL. No. 2721048, 2721049, FAX: 2721053/2721057
E-mail: orierc@gmail.com
Website: www.orierc.org

****

No. DIR (T)-332/2008/ 177
Dt. 01.02.2021

To

The Managing Director,
OPTCL,
Janpath, Bhubaneswar-22.

Sub: Billing procedure consequent upon implementation of new Open Access Regulations, 2020.

Ref: Your letter No. RT&C-47/2020/18(3) dt.08.01.2021.

Sir,

In inviting a reference to the subject mentioned above, it is to intimate you that transmission tariff of OPTCL is governed under OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 which is still in force.

Regulation 6.5 of Transmission Tariff Regulation, 2014 states as follows:

*"**Transmission Tariff:** The Transmission Tariff payable by the Beneficiaries of the Transmission System shall be designed to recover the Aggregate Revenue Requirement approved by the Commission for each year of the Control Period."*

Regulation 2.1(h) of the same Regulation states that a distribution licensee shall necessarily be a long term transmission customer for which it shall be required to enter into a transmission service agreement with the transmission licensee.

Aggregate Revenue Requirement of the transmission licensee is recovered from the beneficiaries DISCOMs who are long term open access customers. The Commission carryout true up exercise under the same Regulation basing on the actual expenses booked in the audited books of the account of the transmission licensee for the year and expenses allowed in the ARR for the corresponding financial year. Therefore, the approved ARR of the transmission licensee is well taken care of for any short fall on this account. The STU has entered into transmission service agreement with the DISCOMs accordingly.

O/C

The Open Access Regulation, 2020 stipulates that the open access customer who wishes to avail open access under that Regulation shall have to apply for the same. DISCOMs do not come under the same and are governed under Transmission Tariff Regulation, 2014 and consequential special transmission service agreement. The long term customer other than the DISCOMs shall come under OERC Open Access Regulation, 2020.

Therefore, you are required to follow OERC Transmission Tariff Regulation, 2014 scrupulously as long as it is in force.

Yours faithfully,

SECRETARY 1.2.2021

Annexure-02

सत्यमेव जयते

अखिल भारतीय विद्युत सांख्यिकी

All India Electricity Statistics

सामान्य पुनर्विलोकन 2025

(2023-24 के आंकड़े समाविष्ट)

General Review 2025

(Containing Data for the Year 2023-24)

भारत सरकार
विद्युत मंत्रालय
केंद्रीय विद्युत प्राधिकरण
नई दिल्ली
नवंबर 2025

Government of India

Ministry of Power

Central Electricity Authority

New Delhi

November 2025

(अधिनियम 2003 की धारा 73 (आई) एवं (जे) के तहत के. वि. प्रा. के दायित्व के पालन हेतु प्रकाशित)

(Published in fulfilment of CEA's obligation under Section 73(i) & (j) of the Electricity Act 2003)

Table 6.2
Regional Transmission Losses
Utilities
2023-24

Region	Energy Available in the Region (GWh)	Export to other Region (GWh)	Export to Nepal (GWh)	Export to Bangladesh (GWh)	Export to Bhutan (GWh)	Export to Myanmar (GWh)	Total Energy drawal by States/Utilities (GWh)	Transmission Losses (GWh)	Transmission Losses (%)
1	2	3	4	5	6	7	8	9 (2-3-4-5-6-7)	10((8/2)x100)
Northern Region	234996.97	3117.23	170.57	0.00	0.00	0.00	224302.97	7406.20	3.15
Western Region	332120.58	99896.14	0.00	144.00	0.00	0.00	221708.25	10372.19	3.12
Southern Region	212787.85	4758.03	0.00	0.00	0.00	0.00	200663.51	7366.31	3.46
Eastern Region	142021.92	55318.56	1254.36	7315.07	1330.61	0.00	70787.65	6015.68	4.24
North Eastern Region	19710.81	3117.64	0.00	1072.11	0.00	8.47	14746.36	766.23	3.89

13 JAN 2026

NOTARISED

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur
Bhubaneswar-751021

Case No: 121/2025
Filing No: 1

IN THE MATTER OF:

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022

... Applicant

AND

IN THE MATTER OF:

M/s. Power Tech Consultants, Corporate office at K-8-82, Kalinga Nagar, Ghatikia, Bhubaneswar-751029, Odisha. Phone No 9437155337, Email: pwrtch@gmail.com

... Respondent

13 JAN 2026

Affidavit verifying the application

I, Mr. Bibhu Charan Swain, son of Mr. Baishnab Charan Swain, aged about 49 years, working as Sr. Consultant of M/s. Power Tech Consultants having its corporate office at K-8-82, Kalinga Nagar, Ghatikia, Bhubaneswar-751029, Odisha do hereby solemnly affirm and state as follows: -

1. That I am working as Sr. Consultant at M/s. Power Tech Consultants and I am duly authorized to swear this affidavit on its behalf.
2. The statements made herein now are based on information and I believe them to be true

PLACE: Bhubaneswar
DATE: 12.01.2026

M/s. Power Tech Consultants
Authorised Signatory
DEPONENT

JANMEJAYA RAUTRAY
NOTARY GOVT. OF ODISHA
BHUBANESWAR
REGD. NO. ON-86[illegible]

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur
Bhubaneswar-751021

Case No: 121/2025
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AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022.

... Applicant

AND

IN THE MATTER OF:

M/s. Power Tech Consultants, Corporate office at K-8-82, Kalinga Nagar, Ghatikia, Bhubaneswar-751029, Odisha. Phone No 9437155337, Email: pwrtch@gmail.com

...Respondent

The humble respondent above named most respectfully submits as under:

1. M/s. Power Tech Consultants (hereinafter referred as PTC), a firm registered in Odisha State under the Indian Partnership Act, 1932 with its Corporate cum correspondence office at K-8-82, Kalinga Nagar, Ghatikia, Bhubaneswar-751029, Odisha.

2. PTC is submitting the following points on the application of OPTCL for determination of Annual Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 for kind review and necessary action by the Hon'ble Commission.

3. Human Resources Expenses:

The OPTCL has projected Employee Cost expenditure at Rs. 531.52 Crore for FY 2026-27 against Rs. 488.63 Crore as approved by the Commission to be spent during FY 2025-

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26. The summary of Employee Expenses of OPTCL for the last sixteen financial years is furnished below.

Summary of Employee Expenses

Financial Year	Proposed	Approved	Actual
2010-11	865.13	279.56	173.11
2011-12	952.06	338.14	279.56
2012-13	655.36	318.48	268.59
2013-14	341.2	289.3	191.70
2014-15	361.38	318.18	309.59
2015-16	310.02	305.23	285.95
2016-17	399.56	292.55	382.44
2017-18	462.33	304.5	380.32
2018-19	419.57	360.4	375.65
2019-20	421.99	419.77	394
2020-21	466.22	415.87	373.19
2021-22	532.73	457.88	474.83
2022-23	526.53	477.19	
2023-24	508.76	449.08	
2024-25	582.06	488.63	
2025-26	554.05	488.63	
2026-27	531.52		

OPTCL may provide a detailed employee list cadre wise approved sanctioned strength by Govt. of Odisha vis-avis actual post filled up and post laying vacant.

The cost break-up of the employee expense is provided below:

Sl. No	Particulars	Prev. Year 2024-25	Curr. Year 2025-26	Ensuring Year 2026-27
A	**Salary & Allowance**	1	2	3
1	Basic Pay	151.82	158.83	159.57
2	Dearness Allowance	79.79	96.89	102.12
3	House Rent Allowance	25.25	23.89	25.77
4	Medical Allowances	7.66	8.34	8.38
5	Conveyance Expenses (Allowance	4.13	4.08	6.28

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	+ Reimbursement)			
6	Other Allowance	1.63	1.70	1.81
7	Bonus	0.18	0.20	0.20
8	Stipend for New Recruitment	8.09	4.05	5.70
9	Stipend to Apprentice	1.45	2.00	2.08
10	Arrear Salary for Wage Board Revision			
	Sub-total (A)	280.00	299.59	311.91
B	**Additional Employee Cost**			
1	Out Sources Engagement	3.78	4.34	7.01
	Sub-total (B)	3.78	4.34	7.01
C	**Other Employee Cost**			
1	Leave Travel Concession	0.15	0.59	0.59
2	Honorarium	0.10	0.12	0.19
3	Ex-gratia	6.44	6.50	7.92
4	Staff Welfare Expenses	4.48	7.94	12.02
5	Other Employee Cost	-	0.03	0.04
6	Capacity Building Charges	1.30	2.00	2.40
	Sub-total (C)	12.48	17.19	23.16
D	**Terminal Benefits**			
1	Pension	135.94	140.02	144.22
2	Gratuity	13.22	13.62	14.03
3	Leave Salary	19.91	20.51	21.12
4	Other (including contribution to NPS)	24.46	24.99	26.47
	Sub-total (D)	393.53	199.14	205.84
E	**Total Employees Cost (A+B+C+D)**	489.78	520.26	547.93
F	Less: Employees Cost Capitalised	16.40	16.40	16.40
G	**Net Employee Cost (E- F)**	473.38	503.85	531.52

- **Basic Pay and Grade Pay:** Basic Pay and Grade Pay proposed for FY 2026-27 = Rs. **159.57** Cr. is based on actual cash flow for FY 2025-26 with additional increment of 3% and average number of employees. OPTCL is planning to recruit 250 Nos. employees during FY 2025-26 and 50 Nos. in FY 2026-27.
- **DA:** OPTCL proposed 64% DA for FY 2026-27, considering Finance Dept guidelines. However, actual increases in DA may be reviewed.
- **HRA:** OPTCL proposed HRA @19%. Actual cash flow may be considered.

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- **Outsourcing:** OPTCL is functioning with 50% of manpower and has outsourced services. Accordingly, Rs. 7.01 Cr. has been proposed towards payment to outsourced personnel. The same can be reviewed.
- OPTCL is planning to recruit 250 Nos. employees during FY 2025-26 and 50 Nos. in FY 2026-27 and has proposed Rs.05.70 Cr. towards stipend for the new recruiters. Considering the past trend of recruitment the same may be reviewed.
- Actual addition of employees is lesser than the approved. Stipend and employee cost should be approved by reviewing proposed addition of employees.
- Terminal benefits should be reviewed on an actual cash flow basis.

Hence the Employee cost Expenses of OPTCL for FY 2026-27 may be approved accordingly by the Hon'ble Commission.

4. Repair and Maintenance (R&M) expenses

That, the OPTCL has projected Repair and Maintenance Expenses at Rs. 259.65 Cr for FY 2026-27 against Rs. 160 Crs as approved by the Commission to be spent during FY 2025-26.

The summary of Repair and Maintenance (R&M) expenses of OPTCL for the last sixteen financial years is furnished below.

Summary of R & M Cost

Financial Year	Proposed	Approved
2010-11	98.14	60
2011-12	93.89	75
2012-13	95.46	95
2013-14	108.91	60
2014-15	146.77	93
2015-16	154.11	108
2016-17	170.66	110.59
2017-18	155.11	124.97
2018-19	156.19	111
2019-20	115.22	115.22
2020-21	140.59	115.22
2021-22	151.1	118.61
2022-23	148.04	110.5
2023-24	164.34	135
2024-25	169.3	135
2025-26	217.7	160
2026-27	259.65	

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It is respectfully submitted that R&M cost of OPTCL for FY 2026-27 may be approved accordingly by the Hon'ble Commission.

5. Administration & General Cost

That the OPTCL has projected Administrative and General (A&G) expenditure at Rs. **46.95 Crs** for FY 2026-27 against Rs. **42.46** Crs as approved by the Commission to be spent during FY 2025-26.

The summary of Administrative and General Expenses of OPTCL for the last sixteen financial years is furnished below.

Summary of A&G Cost

Financial Year	Proposed	Approved
2010-11	26.99	15.14
2011-12	38.34	18
2012-13	39.11	21.25
2013-14	23.09	22.39
2014-15	25.46	24.01
2015-16	32.36	24.37
2016-17	25.58	24.66
2017-18	26.11	25.6
2018-19	27.23	26.44
2019-20	28.07	27.55
2020-21	28.66	28.72
2021-22	38.13	30.35
2022-23	43.18	37.73
2023-24	47.07	40.28
2024-25	51.13	37.05
2025-26	49.8	42.46
2026-27	46.95	

The Hon'ble Commission may review the Inspection fee expenses and training expenses. Details of the training calendar and its benefits may be checked.

6. Depreciation Cost

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That the OPTCL has projected depreciation expenditure at Rs. 337.09 Crs for FY 2026-27 against Rs. 284.33 Crs as approved by the Commission to be spent during FY 2025-26.

The summary of Depreciation of OPTCL for the last sixteen financial years is furnished below.

Summary of Depreciation Cost

Financial Year	Proposed	Approved
2010-11	153.31	76.6
2011-12	156.4	79.42
2012-13	155.99	78.57
2013-14	172.85	89.4
2014-15	176.02	92.71
2015-16	197.72	107.48
2016-17	150.5	101.45
2017-18	192.59	130.76
2018-19	217.9	145.43
2019-20	186.03	162.06
2020-21	208.59	195.59
2021-22	276.5	232.95
2022-23	263	233.57
2023-24	293.96	269.54
2024-25	320.03	275.67
2025-26	356.57	284.33
2026-27	337.09	

- Norms of tariff regulations and rates as specified in the Transmission Tariff regulations should be considered.
- The depreciation should be determined after due scrutiny.

7. That OPTCL has a positive cash flow, and therefore interest on working capital should not be allowed.

8. OPTCL has projected addition of transmission assets of Rs. 2561.3 Cr. to be spent during FY 2026-27 and claimed advanced depreciation for the same in its ARR for FY 2026-27. It is proposed that, such claim of advanced depreciation by OPTCL to the tune

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of Rs. 337.09 Cr. may be rejected. Once, the project is capitalized, then the associated depreciation may be passed in the ARR of subsequent Tariff years.

9. OPTCL has claimed ROE on projected original book value of transmission fixed assets of Rs. 6002.32 Cr as on 31.03.2026 which is wrong. It should be on actual equity deployed, as on 31.03.2026, hence ROE at the rate of 15.5% is to be paid on equity deployed and not on fixed assets of OPTCL.

10. In FY 2024-25, as per audited accounts OPTCL has received the following amount towards other income, inter-state wheeling & miscellaneous revenue.
STOA Charges 207.83 Cr. + Other Operating Revenue (10.49+2.62+0.13 = 13.24 Cr.) + 281.01 Cr. = 502.08 Crore.

The extracts of Audited Report is furnished below.

M/s. Power Tech Consultants

Authorised Signatory

Odisha Power Transmission Corporation Limited
(A Government of Odisha Undertaking)
Regd. Office: OPTCL Tech Tower, Saheed Nagar, Bhubaneswar - 751007
CIN : U401020RSGC007553

Notes to the Financial Statements

26 - Revenue from operations

Amount in Rs. Crore

	Year ended 31.03.2025	Year ended 31.03.2024
(a) Transmission charges		
i. Long-term open access charges	896.09	873.35
ii. Medium-term open access charges	0.43	-
iii. Short-term open access charges	207.83	162.84
(b) Other operating revenue		
i. System operation charges	10.49	9.99
ii. Market operation charges	2.62	2.50
iii. Application & Registration fees	0.13	0.24
Total revenue from operations	**1,117.59**	**1,048.92**

27 - Other income

	Year ended 31.03.2025	Year ended 31.03.2024
(a) Interest income from		
- Bank deposits	74.83	74.34
- Loans to employees and suppliers	1.27	1.53
- Interest on income tax refund	1.19	-
(b) Deferred Income	139.03	112.36
(c) Sale of Scrap	0.51	1.51
(d) Excess Provision written back	2.74	18.08
(e) Supervision charges/ Implementing Agency Charges	31.53	22.10
(f) Other miscellaneous income	29.91	20.05
Total other income	**281.01**	**249.97**

However OPTCL have only considered 275.35 Cr towards miscellaneous receipt which needs to be checked prudently. As per regulation 8.30 & 8.40 of Transmission Tariff Regulation all these expenses are to be deducted in full from the ARR for the purpose of calculation of tariff of OPTCL.

11. Annual Revenue Requirement:

That the OPTCL has given the proposal for an annual revenue requirement of Rs. 1765.40 Crore for FY 2026-27 against Rs. 1331.02 Crore as approved by the Commission to be spent during FY 2025-26.

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The summary of ARR of OPTCL for the last fifteen financial years is furnished below.

Financial Year	Proposed	Approved
2011-12	1435.88	579.34
2012-13	1348.46	612.53
2013-14	874.74	597.87
2014-15	988.8	641.3
2015-16	1008.36	630.94
2016-17	975	623.25
2017-18	1013.63	639.4
2018-19	990.65	659.95
2019-20	861.27	706.71
2020-21	966.44	713.84
2021-22	1307.17	792.93
2022-23	1247.14	831.95
2023-24	1102	896.18
2024-25	1380.69	913.7
2025-26	1663.33	1331.02
2026-27	1765.40	

Hence the Annual Revenue Requirement of OPTCL for FY 2026-27 may be approved accordingly through a prudence check and based on the submission made above by the Respondent.

12. It may be noted that as per balance sheet 2024-25, the surplus income for OPTCL is around Rs. 237.8 Cr in the books of OPTCL which indicates that OPTCL is granted by higher transmission charges as compared to its legitimate requirement and hence there is a surplus revenue in the ARR at the cost of general consumer. Hence the same may be adjusted by reducing transmission charges through a prudence check by Hon'ble Commission.

13. Determination of Transmission Charges

OPTCL has given the proposal for transmission charges @ **35.61 P/U** for FY 2026-27 against 25.5 P/Unit as approved by the Commission during FY 2025-26. The proposed Transmission Tariff of **35.61 P/U** is very high and should not be permitted. This will adversely affect the RST of the DISCOMS and will be a huge burden on the consumers of

M/s. Power Tech Consultants
Authorised Signatory

Odisha. Therefore, it is respectfully submitted that the Transmission charges levied by OPTCL should be substantially reduced.

14. It is proposed to allow the rebate of 2% on prompt payment for Open Access customers, particularly Long & Medium-Term Open Access customers including DISCOM and may treat all the customer of OPTCL in same footing.

15. The Open Access Regulations, 2020 treat the DISCOMs and other Open Access users like CGP, and Industrial Consumers on the same footing. However, exceptions is being carved out, wherein the DISCOMs need not submit their contracted quantity and are allowed to pay Transmission Charges on the actual energy transacted, whereas the other OA customers like CGPs, Industries are being forced to pay the Transmission Charges on the Contracted Quantity. Further, OPTCL has proposed to do away with the prompt payment rebate for OA customers like CGPs and Industries while allowing the prompt payment rebate benefit to DISCOMs. This type of differential treatment is against the Open Access Regulation, Grid Code, and statutory provision under the Electricity Act 2003. Therefore, it is requested that the Commission to treat all the Transmission Users i.e. CGPs, Industries, and DISCOM on the same footing with provision for charges, and rebates on the same principle without any discrimination.

16. Transmission Loss:

The transmission loss of various Transmission Licensee of the various state is furnished below for ready reference.

M/s. Power Tech Consultants

Authorised Signatory

Transmission losses over the past three years (%)

State transmission utility	2022-23	2023-24	2024-25
AEGCL	3.31	3.28	3.24#
APTRANSCO	2.61	2.69	2.75#
BSPTCL	2.57	2.6@	3.00#
CSPTCL	3.17	3.51	NA
DTL	0.84	0.78	NA
GETCO	3.83	3.34	3.84#
HVPNL	1.93	2.00	1.87@
JUSNL*	2.23	2.23	2.23
KPTCL	2.98	2.97	2.78#
KSEBL	2.58	3.30^^	3.20^^
MePTCL	3.16	2.82	3.18#
MPPTCL	2.63	2.61	2.75^^
MSETCL	3.34	3.18	3.18
MSPCL	7.80^^	7.20#	7.42#
OPTCL	3.15	3.11	3.09**
PSTCL	2.27	2.24	2.23#
PTCUL	0.97	1.04	1.02
RRVPNL	4.18~	4.23	4.29#
TGTRANSCO	2.52	2.29	2.48#
TSECL	3.50	4.31@	2.50#
UPPTCL	3.30	3.16	3.22~
WBSETCL	2.11	2.18	3.10#

**Submitted by the transco in its tariff petition/multiyear tariff petition; # Estimated/Projected/Proposed by the transco; ^ ^ Approved by the tariff commission; ~ Up to December 2022; @ Till September 2024; **April-September 2024*

Source: Compiled by India Infrastructure Research from utility annual reports, regulatory filings and financial statements

OPTCL has proposed transmission loss at 3.05%. In conformity with the power sector reform, OPTCL needs to reduce the transmission loss significantly.

A comparison has been made by the Respondent show casing how other transmission licensee has performed better as compared to OPTCL as far reduction in Transmission Loss is concerned and same is furnished below.

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State Transmission Utilities with Transmission Losses Lower than OPTCL		
(Comparison based primarily on FY 2024-25 data; OPTCL = 3.09%)		
Sl. No.	**State Transmission Utility**	**Transmission Loss FY 2024-25 (%)**
1	DTL (Delhi)	0.78
2	PTCUL (Uttarakhand)	1.02
3	HVPNL (Haryana)	1.87
4	PSTCL (Punjab)	2.23
5	JUSNL (Jharkhand)	2.23
6	TGTRANSCO (Telangana)	2.48
7	TSECL (Tripura)	2.5
8	APTRANSCO (Andhra Pradesh)	2.75
9	KPTCL (Karnataka)	2.78
10	BSPTCL (Bihar)	3
11	MPPTCL (Madhya Pradesh)	2.75

OPTCL has reported transmission losses of 3.15% in FY 2022-23, 3.11% in FY 2023-24, and 3.09% (projected) in FY 2024-25. While the losses show marginal improvement, they remain higher than several efficiently performing STUs, many of which have consistently maintained losses below 2.5%, and in some cases even close to or below 2%.

Utilities such as DTL (Delhi), PTCUL (Uttarakhand), HVPNL (Haryana), PSTCL (Punjab), JUSNL (Jharkhand), TGTRANSCO (Telangana), APTRANSCO (Andhra Pradesh) and KPTCL (Karnataka) have demonstrated that lower transmission loss levels are practically achievable with appropriate planning, execution and system optimisation.

Accordingly, the Hon'ble Commission may consider approving transmission loss for OPTCL at 2.5%, thereby making it a mandatory performance target.

17. It is respectfully submitted that Odisha Power Transmission Corporation Limited (OPTCL) has not yet demonstrated a robust, transparent, and technically sound approach towards identification, assessment, and reduction of transmission losses in the State transmission system. Despite repeated submissions and stakeholder concerns, OPTCL has not identified the specific areas, voltage levels, lines or substations where transmission losses are maximum, nor has it placed on record any structured action plan for transmission loss reduction.

OPTCL has also not disclosed the detailed methodology adopted for estimation of transmission losses for each year. Transmission loss has been proposed largely on an aggregate basis, without providing any scientific breakup of losses attributable to

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different components of the transmission system, such as transmission lines, substations, power transformers, auto-transformers, reactive power flow, or system congestion. For a State Transmission Utility (STU), such an arbitrary projection of loss figures without component-wise or asset-wise analysis is neither technically appropriate nor acceptable from a regulatory standpoint. Consequently, proposing transmission loss merely as part of a business plan, without substantiating it through empirical system studies, renders such projections largely meaningless and unverifiable.

18. It is submitted that adequate technical measures exist for reduction of transmission losses, including but not limited to periodic energy auditing, optimisation of transformer loading, reactive power management, timely commissioning of transmission assets, and system strengthening. However, OPTCL has not undertaken comprehensive energy audits of its transmission lines and substations, which are essential to ascertain the quantum and causes of technical losses in the system. In the absence of such audits, OPTCL remains unable to precisely diagnose inefficiencies or implement targeted corrective measures.

19. It is further pertinent to note that, in various past Orders, the Hon'ble OERC and the Government of Odisha have infused substantial public funds into OPTCL for capital expenditure aimed at strengthening and expanding the transmission network. However, despite such significant financial support, the expected commensurate reduction in transmission losses has not materialised. One of the key contributing factors appears to be inefficiency in project management, leading to considerable time overruns and cost overruns in execution of transmission projects. Delays in commissioning of transmission lines, substations and associated infrastructure have resulted in OPTCL's inability to match the transmission capacity requirements of generators, DISCOMs and open access users, causing congestion, sub-optimal system operation and avoidable technical losses.

20. Further, despite repeated appeals from various stakeholders, OPTCL has not conducted any independent third-party energy audit of its transmission losses, nor has it published audited transmission loss data on its website or submitted such data before the Hon'ble Commission. This lack of transparency stands in sharp contrast to the practice adopted by the four DISCOMs in Odisha, which have conducted third-party audits of their distribution losses and placed the audited data in the public domain pursuant to the mandatory loss-reduction targets prescribed under the Vesting Order. The absence of an independent audit mechanism for transmission losses raises serious concerns regarding the accuracy of reported losses, transparency in operations, and accountability of the STU.

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21. In view of the above, it is respectfully submitted that mere projection of marginally declining transmission losses without independent verification should not be accepted by the Hon'ble Commission. To bring in regulatory discipline, transparency and performance efficiency comparable to leading State Transmission Utilities in the country, it is imperative that OPTCL is subjected to a stringent and enforceable transmission loss benchmark. Accordingly, the Hon'ble Commission may consider approving transmission loss for OPTCL at 2.5%, thereby making it a mandatory performance target. Such a regulatory signal would incentivise OPTCL to improve project execution, complete pending transmission schemes in a time-bound manner, undertake scientific energy audits, and adopt best practices followed by efficient STUs, ultimately benefiting consumers through reduced system losses and lower costs.

22. In light of the foregoing, it is humbly prayed that the Hon'ble Commission may be pleased to:

- Recalculate and approve the transmission loss of OPTCL appropriately, keeping in view national benchmarks and comparative performance of other State Transmission Utilities;
- Direct OPTCL to conduct an annual Third-Party Energy Audit of its transmission system, covering lines, substations and transformers, through an accredited energy auditor in accordance with regulatory guidelines;
- Mandate submission and public disclosure of audited transmission loss data, along with methodology and component-wise breakup of losses;
- Monitor OPTCL's performance through a third-party auditor appointed by or approved by the Commission, so as to independently assess actual loss levels and implementation of corrective measures.

The requirement of an annual third-party energy audit is critical not only for accurate assessment of transmission losses but also for identification of inefficiencies and formulation of effective loss-reduction strategies, which will ultimately enhance the operational efficiency, financial health of OPTCL, and consumer interest in the State of Odisha.

23. In Form T-6 filed by OPTCL, the gross energy input to the transmission system for the period April 2025 to September 2025 has been considered as 26,611.12 MU, while the gross energy output has been reported as 25,792.92 MU, resulting in a reported transmission loss of 818.20 MU for the said six-month period.

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However, it is submitted that this loss computation does not take into account the inadvertent energy injection by Captive Generating Plants (CGPs) connected to the OPTCL transmission system. It is a known operational fact that a CGP of about 250 MW capacity injects approximately 25 MU of energy per financial year into the OPTCL grid as inadvertent or un-scheduled injection. Considering that the operational CGP capacity in Odisha is approximately 9,850 MW, the estimated annual inadvertent injection into the OPTCL grid works out to about 985 MU, which corresponds to approximately 492.5 MU for a six-month period.

In the absence of adjustment for such inadvertent CGP injections, the reported transmission loss of 818.20 MU for six months is overstated and technically inaccurate, particularly in the absence of any independent third-party energy audit. After appropriately accounting for the inadvertent CGP injection of 492.5 MU, the net transmission loss for the said period would be 818.20 MU – 492.5 MU = 325.70 MU. Accordingly, the actual transmission loss of OPTCL for the period works out to approximately 1.22% (i.e., 325.70 MU / 26,611.12 MU), which is significantly lower than the loss reported by OPTCL.

It is therefore submitted that OPTCL has not disclosed or factored in CGP inadvertent injection in Form T-6, leading to an inflated projection of transmission loss. In view of the above, the Hon'ble Commission may kindly direct OPTCL to explicitly incorporate CGP inadvertent energy injections in its energy accounting, recalculate the transmission loss on a scientific and verifiable basis, and submit the revised figures to the Hon'ble Commission for due scrutiny and approval.

In view of the above submissions, it is humbly prayed that the Hon'ble Commission may be pleased to consider the aforesaid facts and accordingly re-calculate and approve the transmission loss of OPTCL.

24. That earlier CGPs used to inject inadvertent power to the grid and GRIDCO availed the benefits of inadvertent power. GRIDCO also used to pay the hydro pool cost towards the inadvertent power. However, from FY 2019-20 onwards GRIDCO has stopped making payment towards inadvertent injections. Hence, OPTCL become the ultimate beneficiary of such injection of inadvertent power. We pray to Hon'ble Commission to direct OPTCL to submit the detail list of inadvertent injection for each month by each CGP and consider the same as an additional injection to the grid accordingly calculate the transmission loss. The data of inadvertent injection is available with OPTCL and SLDC for each month for each CGP who are connected to EHT transmission system of OPTCL. The entire stakeholder and consumers of Odisha will be benefitted by such methodology as the intra-state transmission loss will reduce significantly.

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25. Given the significance of maintaining transparency and accuracy in the transmission system's performance, it is requested that OPTCL conduct a Third-Party Energy Audit of its transmission loss. The energy audit should be carried out by an accredited energy auditor in line with the guidelines specified by the regulatory authorities.

The requirement to conduct an annual energy audit is crucial not only for assessing transmission losses but also for identifying potential inefficiencies and implementing corrective actions that can help in optimizing the system's overall performance. This audit will provide an independent, unbiased evaluation of the transmission system's energy losses and help in formulating strategies for loss reduction, which will ultimately contribute to improving the operational efficiency and financial health of OPTCL.

26. Open Access Charges:

Each year Hon'ble OERC informed OPTCL to submit 400 kV, 220 kV, 132 kV Power Transformer and EHT lines loading. OPTCL should make a practice to submit the Power flow data for 400 kV, 220 kV line and 132 kV line and its loading and the entire Auto-transformer loading, Power Transformer and ICT loading along with the ARR application. Moreover, by submitting only power transmitted on the peak demand day will not solve the purpose. In order to ascertain the margin availability, OPTCL may be directed to submit the maximum power handling capability, power flow and % loading of all the 400 kV, 220 kV, 132 kV line and Power Transformer, Auto Transformer, ICT Transformers. It is also desired that OPTCL should conduct load flow analysis to handle around 2000-3000 MW differential load in appropriate manner.

Once these data are made available, it can be ascertained that, there are sufficient margin is available in the transmission network and in order to utilize it fully, STOA should be promoted and the charges for the same may be kept at 1/4 of the MTOA and LTOA charges and necessary amendments in the regulations may be made.

27. Introduction of Reactive Energy Charges:

OPTCL has proposed to introduce Reactive Energy Charges of 3 Paise / KVARh which is very high and should be rejected.

28. Levy of Grid Support Charge for connectivity:

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OPTCL has submitted an application to the Hon'ble OERC on 26.06.2024, to determine and approve the imposition of Grid Support Charges for industries with Captive Generating/Cogeneration plants that operate alongside the OPTCL grids.

The case was registered as OERC Case No.-44/2024. In an order dated July 6, 2023, the High Court suggested that if OPTCL wishes to pursue the imposition of Grid Support Charges, they should file a separate application with the OERC. The court emphasized that the OERC, under Section 181 of the Electricity Act, should examine the justifiability of such charges. Hon'ble Commission in order dated 09.07.2024 in case no 44 of 2024 has directed OPTCL to submit a consolidated report considering certain queries. OPTCL has submitted the report on 29.01.2025.

29. It is prayed before the Commission that the levy of Grid Support Charges (GSC) on Captive Generating Plants (CGPs) be abandoned. CGPs are operated by industries that already have a contract demand with the respective DISCOMs, which means they are contributing to the grid through their contracted capacities. The imposition of GSC on CGPs would lead to a scenario where industries are effectively being charged twice for grid support – once through their contract demand with DISCOMs and again via the proposed GSC.

This double charging would result in an unfair financial burden on industries that are already supporting the grid by paying for their contractual obligations. Such a practice could discourage further industrial investments in renewable energy projects, which is counterproductive to the state's objectives of promoting sustainability and industrial growth. Therefore, in the interest of fairness and to avoid unnecessary financial strain on industries, OPTCL should abandon the proposal to levy GSC on CGPs. This would ensure that industries are not unfairly penalized for their contribution to the grid, while also promoting the continued growth of renewable energy in Odisha.

30. It is proposed that OPTCL should proactively prepare and maintain a monthly status report outlining the available transmission lines, substation details, bay availability, and transformer capacity. This would enable prospective developers to assess the existing infrastructure and apply for an NOC for grid connectivity before submitting their applications to the RE nodal agency. By making this information accessible, OPTCL can streamline the process for developers, allowing them to submit their grid connectivity applications with more certainty.

Under the current practice, OPTCL does not conduct a prepaid system study unless the project has received approval from a nodal agency. However, it is recommended that OPTCL issue the NOC for grid connectivity based on the available infrastructure information, without requiring a prepaid system study at this early stage. The detailed prepaid system study can be conducted later, once the project has been approved by the

relevant nodal agency. This approach would help accelerate the approval process and ensure timely facilitation of renewable energy projects in Odisha, while ensuring that the system remains aligned with the capacity of existing transmission infrastructure.

31. OPTCL may be directed to submit the current status of the 765 kV transmission network plan, specifically for the two 765 kV ISTS lines: Angul to Gopalpur and Angul to Paradeep, as well as the status of the 765 kV substation in the Kolabira area. In addition, OPTCL should provide detailed updates on the progress of transmission projects such as the Paradeep-Mahakalapada 765 kV line, the 400 kV substations at Joda, Ersama (Paradeep), and Neulapoi.

Furthermore, OPTCL should inform the Commission about the likely transmission and capacity charges for these projects, ensuring that they are transparent and justifiable. These charges should be subject to a prudence check by the Hon'ble OERC to assess whether they adequately serve the interests of consumers and the state. In cases where the charges do not align with the best interests of the consumers and the state, the Commission may not approve the proposed capital expenditure plan and tendering process. In such instances, OPTCL should be instructed to initiate a fresh tendering process under the Intra-State Transmission Plan to ensure that the most optimal and cost-effective solutions are selected.

32. Transmission business being a capital-intensive project requires long term planning. Therefore, Hon'ble OERC may direct OPTCL to submit MYT tariff and long-term Business Plan based on which Investment Plan should be provided.

33. In the previous tariff hearing, OPTCL submitted that the Transmission Plan of Odisha is being revisited and assured that it would be submitted for the Commission's approval.

The respondent now requests clarification from OPTCL regarding whether the 14th Intra-State Transmission Plan of Odisha has been prepared and submitted to the Hon'ble Odisha Electricity Regulatory Commission (OERC). If the plan has been submitted, it is requested that OPTCL share a copy of the same for review. Furthermore, it is prayed that the Transmission Plan, along with the associated Business Plan and Investment Plan, be subjected to a public consultation process before approval. This approach would ensure transparency and allow stakeholders to provide valuable inputs, ultimately leading to better decision-making and more effective implementation of transmission infrastructure in Odisha.

34. That, the Intrastate transmission system should be developed in a coordinated manner in consultation with CTU, State govt., Generating companies, Regional Power Committees, CEA & licensees. However, such grid coordination meetings are not

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happening regularly. It is proposed that the grid coordination committee meeting may be conducted regularly. No of industries are facing lots of difficulties in getting grid connectivity and enhancement of contract demand. Even the honorable OERC has directed to hold a meeting of OPTCL with DISCOM on a monthly basis to ensure smooth operation of the power sector and MOM to be furnished to OERC. The honorable OERC in its earlier transmission tariff order dated 13.02. 2024 in case no. 113/2023 has directed to submit the revised 14th inter-state transmission plan of OPTCL for approval. OPTCL may kindly submit the status of the 14th inter-state transmission plan of OPTCL and stage wise implementation plan.

35. The Hon'ble OERC has published the OERC (Development of Intra-State Transmission Projects through Tariff Based Competitive Bidding in the State of Odisha) Order, 2022. OPTCL may be directed to submit an action taken report towards execution of new transmission projects. The honorable OERC has earlier directed OPTCL to standardized the transmission line tower, multi-circuit tower etc. the honorable OERC may pass appropriate order.

36. Further, it is proposed that OPTCL should set up an independent testing lab accredited by NABL for testing relays, meters, transformer oils so that such facilities can be availed by industries.

37. It is noted that OPTCL has claimed ₹0.35 Cr towards annual Grid Coordination Committee (GCC) expenses. However, the respondent seeks clarification from OPTCL regarding the number of GCC meetings conducted during FY 2023-24 and FY 2024-25. Additionally, OPTCL should provide details of the outcomes from each GCC meeting or make this information publicly available on its website for transparency and accountability.

The respondent further understands that, as per the provisions of Chapter 11, Clause 2 (2) of the Odisha Grid Code Regulation, 2015, there appears to be a lack of GCC meetings being held in the prescribed manner. It is crucial that the objectives of the GCC, which are to ensure efficient coordination between transmission, distribution, and generation entities, are met as per regulatory requirements. Therefore, OPTCL should clarify the status of GCC meetings, as well as any actions taken to address this issue, ensuring compliance with the Grid Code and the effective functioning of the transmission and distribution system in Odisha.

38. It is proposed that OPTCL should conduct a feasibility study to assess the potential of converting the existing 26 numbers of 132 kV switching stations into 132/33 kV substations. This conversion would involve establishing additional bays and installing 132/33 kV transformers, thereby enhancing the capacity to accommodate the future load requirements of DISCOMs. The proposed upgrade would not only cater to

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the increasing demand from existing consumers but also provide a critical infrastructure platform for connecting future renewable energy (RE) projects, particularly solar power plants, into the grid. This conversion aligns with the growing need for decentralized and renewable energy sources, which are integral to meeting the State's sustainability and decarbonization goals. By expanding the grid infrastructure, OPTCL can ensure that the transmission network is future-proofed to handle an influx of renewable energy, which is expected to play a key role in Odisha's energy transition. Moreover, this initiative will reduce the load on existing substations and improve the overall grid stability, enabling efficient power distribution across the state. Therefore, a comprehensive feasibility study by OPTCL will allow for a detailed assessment of technical, economic, and environmental implications, thereby ensuring that the infrastructure investments are both optimal and sustainable in the long term.

39. It has been seen that Hon'ble OERC raised standard query to OPTCL each year like Loading pattern of existing transmission systems i.e. 400 kV, 220 kV, ICT, Power Transformer, Auto Transformer etc.

OPTCL should make a standard practice to prepare its ARR application and insert these regular features during the ARR application stage considering all relevant query of Hon'ble OERC. This will be quite helpful for the Respondents as well as for the officials of Hon'ble OERC for conducting proper analysis and scrutiny.

40. The Commission should direct OPTCL to engage with the Government of Odisha to secure funding for economically unviable projects and other critical infrastructure developments that serve the larger interest of the State. Many transmission projects, though essential for grid reliability, regional development, and equitable power access, may not be financially viable solely through tariff-based funding. Government grants can bridge this gap, ensuring that crucial transmission infrastructure is developed without placing an excessive financial burden on consumers. Additionally, state-funded support for such projects would facilitate balanced regional growth, promote industrialization in remote areas, and enhance overall energy security. A coordinated approach between OPTCL and the Government will help in prioritizing strategic projects, optimizing resource allocation, and accelerating execution timelines. Therefore, securing grants for these projects is imperative to ensure a robust and resilient transmission network that supports Odisha's long-term energy and economic goals.

41. The Commission may direct OPTCL to continuously monitor the transmission system's operation and take proactive measures to prevent overloading or under loading which is essential for ensuring an efficient and reliable power network. Overloading can lead to equipment failures, increased technical losses, and reduced system lifespan, while under loading results in inefficient asset utilization and financial

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strain. By adopting innovative strategies such as dynamic load management, network reconfiguration, real-time data analytics, and grid optimization techniques, OPTCL can achieve optimal loading of the existing infrastructure. This will not only help in reducing transmission losses but also enhance grid stability and improve overall system efficiency. Additionally, leveraging advanced technologies like AI-driven predictive maintenance, demand forecasting, and adaptive grid control will enable a more resilient and cost-effective transmission network. Therefore, continuous monitoring and proactive intervention are necessary to maximize the operational efficiency of the transmission system, ensuring sustainable and economical power transmission for all stakeholders.

42. The Commission's earlier directive for coordinated development of the intra-state transmission network, ISTS, and downstream distribution infrastructure is crucial to ensure optimal asset utilization, financial prudence, and grid stability. Many substations under OPTCL remain underloaded due to the absence of necessary downstream infrastructure from DISCOMs, leading to stranded assets and inefficient capital deployment. To avoid such inefficiencies, it is essential that OPTCL, DISCOMs, and CTU synchronize their planning and execution timelines. This will prevent unnecessary transmission investments that burden consumers with higher tariffs without delivering corresponding benefits. Moreover, ensuring that transmission system strengthening projects align with actual load growth will reduce the risk of power evacuation bottlenecks, voltage fluctuations, and increased transmission losses. A structured, joint planning approach will enhance grid reliability, improve network efficiency, and protect consumer interests. Therefore, the Commission's directive to mandate discussions among stakeholders before execution is a necessary step to ensure a well-integrated, cost-effective, and sustainable power transmission system.

43. Therefore, Transmission system upgrades should be strategically planned rather than implemented in an ad-hoc manner. The Commission should direct that no transmission system strengthening proposals should be executed without the prior approval of the Commission. Strengthening measures should be backed by technical and economic justifications, as required by OPTCL's license conditions and tariff regulations. Transmission projects involve significant capital investments that ultimately impact consumer tariffs. Prior Commission approval ensures that OPTCL implements only necessary and cost-efficient projects and avoids excessive capital expenditure, which could lead to unjustified tariff hikes for consumers. Aligns investments with the approved capital expenditure (CAPEX) plans under the tariff regulations.

44. The Commission therefore should direct OPTCL to take up the matter with the Government of Odisha to fund the economically unviable projects and the other projects that are required for the larger interest of the State through grants.

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45. OPTCL should be directed to consider the meter data to assess the month-wise transmission loss in intra-state transmission systems including losses at different voltage levels (i.e. 132 kV, 220 kV and 400 kV levels).

46. The power utility has proactively implemented multiple loss reduction strategies, including system automation, load bifurcation, and digitization of the grid. Despite these extensive efforts, the anticipated loss reduction has not been realized, proving that systemic challenges persist beyond mere technical upgrades. Load bifurcation improves local reliability, but its impact on overall transmission loss is minimal, as power still needs to travel long distances from generation to consumption points. The introduction of ring systems instead of radial networks has increased network stability and redundancy, but transmission losses are still governed by physical distance and resistance of the conductors. Advanced transformers and low-loss conductors have been introduced, yet their impact on overall losses will be realized only after complete replacement of old equipment across the entire network. Bay control units (BCUs) and digital substations provide enhanced monitoring and real-time control over power flow, reducing inefficiencies. However, these tools primarily assist in identifying losses rather than eliminating them outright. Their full impact will be seen once corrective actions are consistently implemented over a longer duration.

47. It is proposed that Cyclone resilient robust electricity transmission and distribution infrastructure in coastal areas should be established by OPTCL. OPTCL may be directed to submit a report on how many mobile substations are available with them to meet the contingency situation during cyclone and their cyclone mitigation plan which has been earlier directed by honorable OERC. OPTCL has not taken action for the design of multi-circuit and multi voltage transmission lines. MOP document on reduction in ROW in urban and forest areas.

48. OPTCL should also share the compliance to queries raised by the Hon'ble Commission to all the Objectors.

49. We request the Hon'ble Commission to kindly allow the Respondent to submit any additional submissions, memos, documents etc. as may be required and in general do all such things as may be required in connection with the above reply.

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PRAYER

In the facts and circumstances stated above and in the interest of the parties and the larger interest of the State the Hon'ble Commission be pleased to pass appropriate orders to the effect that

1. ARR of OPTCL may be approved accordingly based on the submission made above.
2. The Transmission Charges should be reviewed and reduced substantially.
3. Transmission loss to be reduced considering the submission made for FY 2026-27.
4. Proposal of Reactive energy charges of 3 paise/KVARh should be rejected.
5. Each year truing up exercise and business plan approval should be carried out by Hon'ble commission through a process of public hearing.

Place: Bhubaneswar

Date: 15.01.2026

For M/s. Power Tech Consultants

M/s. Power Tech Consultants

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BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
PLOT NO. 4, SAILESHREE VIHAR,
CHANDRASEKHARPUR, BHUBANESWAR-751021

CASE NO. 121/2025
FILING NO. 3

IN THE MATTER OF: (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

And

(ii) Truing up application for the FY 2024-25 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

AND
IN THE MATTER OF: Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

..... Applicant

vrs

M/s. Power Tech Consultants, Corporate office at K-8-82, Kalinga Nagar, Ghatikia, Bhubaneswar-751029, Odisha and **16 others.** **..... Objectors**

NOTARY * NOTARY PUBLIC BHUBANESWAR 05.07.2030 * GOVT. OF ODISHA

Rejoinder to the objections raised by the Objector M/s. Power Tech Consultants.

The humble applicant above named

MOST RESPECTFULLY SHEWETH:

1. That, the Objector M/s. Power Tech Consultants vide affidavit dated 16.01.2026 has raised certain submissions on ARR & Transmission Tariff Application of OPTCL for

Nalco Odisha Bank

FY 2026-27 and Truing up application for FY 2024-25. In reply, OPTCL submits its rejoinder to the submissions in the following paragraphs.

Rejoinder to Para 3 to 11:

The respondent has submitted statistical data of the previous years comparing the proposed vis-à-vis approved in respect of expenses towards human resource expenses, R&M expenses, A&G expenses, depreciation and RoE with a request to approve accordingly after due scrutiny. In this regard, it is pertinent to mention that OPTCL has submitted its ARR application for FY 2026-27 as per the various provisions stipulated in OERC (Terms & Conditions for Determination of Transmission Tariff) Regulations, 2014 and directions of the Commission passed in different orders with proper justifications.

Further, details of Sanctioned strength vis-a-vis actual man in position is furnished below:

Manpower position as on 20.01.2026			
Category	**Sanctioned Strength**	**MIP**	**%**
Executive	2040	1400	68.63%
Non-Executive	3862	1342	34.75%
Total	**5902**	**2742**	**46.46%**

With reference to the reply at Para 8, it is clarified that in case an asset is capitalized during the financial year, depreciation is charged only for the period from the date of capitalization up to the end of the financial year, on a pro-rata basis. Accordingly, OPTCL has claimed depreciation amounting to ₹337.09 crore. The details in this regard may be referred to in Para A-3 at Pages 25–26 & F-17 of ARR application .

The details of Return on Equity (RoE) have already been clarified in the ARR application at Pages 26–27, which may kindly be referred to..

Rejoinder to Para 12:

The profit before tax for the FY 2024-25 is ₹ 161.91 Crore. After deduction of current year tax ₹54.42 Crore the net profit for the FY 2024-25 is works out as ₹107.49 crore only. With the adjustment of Deferred tax and MAT credit receivable of ₹130.21 crore the derived net profit is ₹237.70 crore . In compliance with Regulation 7.1 of the OERC Regulations, 2014 OPTCL has filed the True-Up application for FY 2024–25 along with the ARR application for the FY 2026-27. The Hon'ble Commission may adjust/allow

the surplus or deficit arising from the True-Up exercise while determining the tariff for FY 2026–27.

Rejoinder to Para 13:

Determination of Transmission Charges:

The Transmission infrastructures are created considering the demand and request of the DISCOMs / Industries from time to time, after due approval form the Hon'ble OERC through Transmission Plan. Being a Deemed Transmission License, OPTCL has always endeavored to create the Transmission infrastructure for providing reliable and quality power to the consumers of DISCOMs. Accordingly, every year OPTCL is adding more transmission assets to meet the requirement of DISCOMs. Transmission Charge is arrived at 35.61 paise per unit by dividing the total ARR of OPTCL with the recent realistic MU projections of DISCOMs and recovered from them on a monthly basis. This rate will decrease if DISCOMs drawal increases. In fact, OPTCL has consistently advocated for the recovery of transmission charges based on contracted capacity, in line with the practice followed by STUs in other states.

The proposed Transmission Charge of 35.61 p/u has been derived by considering the recent realistic energy demand projections of 41,849.28 MU as communicated by the DISCOMs & other LTOA customers and the ARR figures have been arrived by OPTCL justifying component wise projections as per the provisions contained in OERC Transmission Tariff Regulations, 2014, OPTCL's Audited Accounts for FY 2024-25, all relevant data/information and materials. The details of projections are submitted in page 30 of the present ARR application of OPTCL for FY 2026-27. Moreover, OPTCL had furnished all requisite information and details as per the prescribed formats of the Hon'ble Commission with full justifications.

Hence, mere apprehension of the respondent towards imposition of excessive burden on Discoms seems to be inappropriate and unacceptable which is likely to be rejected at this juncture. Moreover, the contention of the stake holder operating in the value chain of electricity needs to appreciate the fact that the cost recovery has to be in full so as to make the sector sustainable.

Rejoinder to Para 14 & 15:

The Hon'ble Commission vide letter no. DIR (T)-332/2008/77 dated 01.02.2021 has clarified that the DISCOMs do not come under the new regulation "OERC (Terms and conditions of Intra state open access) Regulations 2020" and they are governed under OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations,

2014. A copy of the said letter is provided as **Annexure-01.** Further, the details of provision of Rebate have been meticulously mentioned in page no: 59 of our ARR application for FY 2026-27 as per the said OERC Regulations.

Rejoinder to Para 16-25:

Transmission Loss

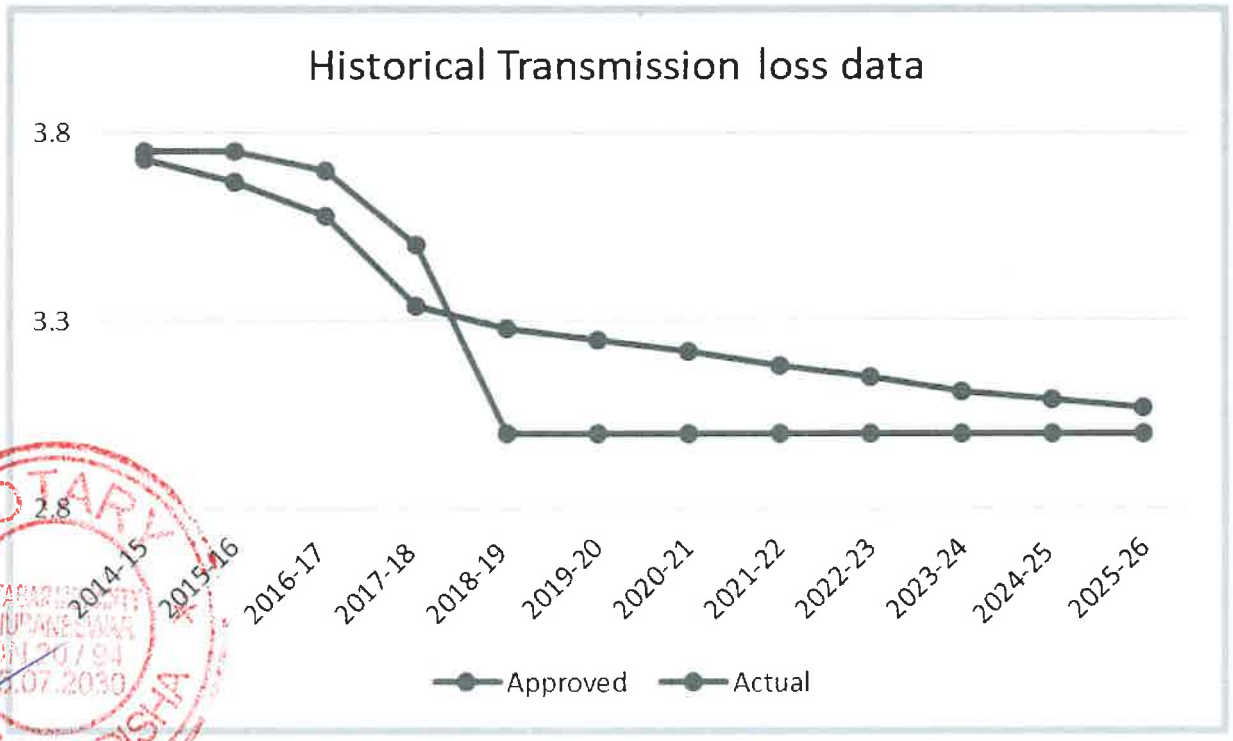
The argument for transmission loss of OPTCL at 2.5% is without justification. The actual transmission loss for the period **Apr' - Sep' 2025** is calculated to be **3.07%** as shown in the ARR & TT application for FY 2026-27 (page-205). This figure is **less than the actual** transmission loss during last year **i.e. 3.09%** for **FY 2024-25.** Infact, OPTCL had projected a Transmission loss of 3.05% for FY 2025-26, but Hon'ble Commission had set a target of 3.00% which could not be achieved yet.

In OPTCL system, the transmission loss is purely technical loss and a function of real time injection of power by a number of generators, system configuration and power flow requirements at different load centers. It depends on many parameters / factors such as distance and mismatch between generation and load centers, types of load, reactive power compensation, voltage profile, seasonal variation of demand load etc. Thus, OPTCL does not have much control over the same at any point of time. The transmission system of OPTCL operates as an integral part of the Eastern Region Grid to serve the internal demand of the State as well as to carry out import and export of power depending upon the system demand.

As a matter of fact, some grid s/s and lines are being constructed in many remote and deprived areas funded under Central & State Govt. schemes in the interest of public. Additional length in EHT lines and Sub-stations in under-loaded areas are also responsible for increase in transmission loss.

Transmission Loss in OPTCL network is in a gradually reducing trend over the years i.e. from 3.73% during 2014-15 to 3.09% in 2024-25 and has remained 3.07% within 1st six months of FY 2025-26 mainly due to addition of infrastructure and various system strengthening works taken up by OPTCL. The actual losses incurred over the years by OPTCL have been within the margin allowed by Hon'ble Commission up to the year FY 2017-18. However in FY 2018-19, the commission set the loss at 3.00% though the projected transmission loss was at 3.25% and thereafter the commission has been pegging the transmission loss at the same level though loss projected by OPTCL remained in a downward trend.

Year	Tr. Loss proposed	OERC Approval	Actual
2014-15	3.75%	3.75%	3.73%
2015-16	3.75%	3.75%	3.67%
2016-17	3.70%	3.70%	3.58%
2017-18	3.50%	3.50%	3.34%
2018-19	3.25%	3.00%	3.28%
2019-20	3.25%	3.00%	3.25%
2020-21	3.20 %	3.00%	3.22%
2021-22	3.15%	3.00%	3.18%
2022-23	3.10%	3.00%	3.15%
2023-24	3.10%	3.00%	3.11%
2024-25	3.05%	3.00%	3.09%
2025-26	3.05%	3.00%	3.07% (1st six months)



From the table given above, it is also clear that each year upto FY 2017-18, the transmission loss achieved by OPTCL has remained at a level lower than the approved figures by Hon'ble commission and from FY 2018-19 the target set by Hon'ble OERC appears to be very stiff which was hard to achieve though the trend of lesser transmission loss year after year has been achieved.

It may kindly be appreciated that transmission (technical) losses are inevitable in power systems due to the fundamental laws of physics and become increasingly difficult to reduce beyond a certain threshold. Further, at the all-India level, transmission losses across different regions have consistently remained above 3.12%. To substantiate our viewpoint, the transmission loss data for various regions is presented below for the kind consideration of the Hon'ble Commission.

Transmission loss of Different Regions for FY 2023-24

Region	Transmission loss
Northern Region	3.15%
Western Region	3.12%
Southern Region	3.46%
Eastern Region	**4.24% (Odisha- 3.11%)**
North Eastern Region	3.89%

(Courtesy: General Review 2025, Government of India, Ministry of Power, CEA attached as **Annexure-02**)

It may be observed that OPTCL's transmission loss of 3.07% is lower than the average transmission losses of all regions.

However, as a responsible Transmission utility, OPTCL is making an all-out effort to reduce the transmission loss further by undertaking various **system operation and loss reduction measures** by implementing the emerging technologies like **system Automation**, load bifurcation, **modification in system configuration**, procurement of more efficient equipment, **Digitalization of grids** by using SAS, Protection system improvement using Busbar protection and Event Logger, Advanced Metering Infrastructure**, Conversion of Radial to Ring system,** construction of GSS at **higher voltage levels** (220kV & 400kV), Replacement of old conductors and Transformers etc. to bring it to **3.05% by FY 2026-27.**

Steps taken for Energy Audit

Under the PSDF funding, SLDC is implementing the SAMAST project. After operational of SAMAST project, detailed energy auditing is possible.

Regarding publication of Transmission loss

OPTCL publishes the performance of the EHT transmission system in newspapers each year, including transmission loss details, for the information of the general public, in compliance with the directions of the Hon'ble Commission. Further,

transmission loss figures in the approved T-6 formats are submitted as annexures to the ARR application. Therefore, adequate measures have already been taken to inform the public about OPTCL's transmission losses. As suggested by the learned respondent, displaying transmission loss figures on the OPTCL website would be a constructive measure and is a welcome suggestion.

Regarding inadvertent power

CGPs are not firm sources of power as they are essentially meant for captive consumption. OPTCL does not agree to the assumption of the respondent that around 985MU of inadvertent power will be injected into the OPTCL system in a year considering the CGP capacity of 9850MW. From the Pool Cost data provided by GRIDCO for the first six months of FY 2025-26, it is observed that the total inadvertent power injection is 230.643MU which has been already considered while calculating the Transmission loss of 3.07% in form T-6. Hence, Transmission loss as suggested by the Objector is not just and proper. Details of inadvertent power injected by CGPs in FY 2025-26 till September is furnished as under:

Month	**Quantum of inadvertent power (MU)**
April-25	38.31
May-25	38.79
Jun-25	39.97
Jul-25	30.39
Aug-25	43.27
Sep-25	39.92
Total	**230.64**

Further, it is submitted that Transmission charge is being computed on Open access transactions based on scheduled energy. Hence, OPTCL does not reap any benefit out of inadvertent power.

Rejoinder to Para 26:

Open Access Charges:

The system peak demand of **7069.89 MW** was touched on 12.08.2025 at 24:00 Hr. Statement on the loading pattern of the existing transmission system (400kV, 220kV & 132kV EHT lines along with loading on ICT, Auto & power transformers) corresponding

to the peak demand is submitted in compliance to the OERC queries on ARR application of OPTCL for FY 2026-27 which will submitted to your good self along with this reply. OPTCL has already conducted load flow study considering different load scenarios i.e. Summer peak, Winter lean, High hydro, Low Hydro & Solar Peak in the Revised 14th Intra-state Transmission Plan of Odisha for FY 2022-23 to FY 2026-27, which has been duly approved by Hon'ble Commission vide case no. 08/2024. In the said report, percentage loading of all Transmission lines, ICTs, Auto & Power Transformers till FY 2026-27 have been mentioned. The Transmission infrastructures are being created considering the demand and requests of the DISCOMs/Industries from time to time after due approval form the Hon'ble OERC through Transmission Plan. DISCOMs and other LTA customers are responsible to bear the full approved ARR of OPTCL. STOA charge is being charged as per the Open Access Regulations, 2020.

Further, the revenue earned from STOA transactions is accounted for under Miscellaneous Income and is ultimately deducted from the Gross ARR to arrive at the net recoverable transmission charges to be recovered from consumers, including DISCOMs. Therefore, application of the 1/4th concept would result in an additional burden on domestic consumers. Further, as per CERC Regulations, the STOA rate is comparatively higher than LTA.

It is pertinent to mention that LTA consumers enjoy the first right and greater benefits compared to MTOA and STOA consumers. Therefore, for industries seeking a reliable, quality, and uninterrupted power supply, availing Long-Term Access (LTA) remains one of the most suitable options.

Rejoinder to Para 27:

Reactive Energy Charges:

As per Regulation 31(1) under Chapter-7 (IMBALANCE AND REACTIVE ENERGY CHARGES) of the OERC (Terms and Conditions of Intra-State Open Access) Regulations, 2020, payment for the reactive energy charges by open access consumers shall be in accordance with provisions stipulated in the State Grid Code or as may be specified in relevant regulations/orders of the Hon'ble Commission .

The Hon'ble Commission in Para 16 (page 5) of the order dated 05.02.2019 in Case No. 50/2017 has inter alia viewed that the provisional reactive energy charges of 3 paise/KVArH as allowed in the ARR order of OPTCL for FY 2018-19 continue for time being till a final justification is submitted by OPTCL in consultation with the stakeholders. However, despite raising reactive energy bills by SLDC since the

beginning of FY 2025–26, no amount has been received in the Reactive pool account against Reactive Energy Charges to date due to non-payment by DISCOMs and other LTOA customers.

In view of the above, OPTCL proposes that 3paise/KVARh may be approved provisionally as Reactive Energy Charges for FY 2026-27.

Hence, the proposal of the objector to reduce the reactive energy charges as suggested by OPTCL is not just and proper.

Rejoinder to Para 28 & 29:

Levy of Grid Support Charge for connectivity:

The benefits derived by the CGPs with co-located loads are enormous. The benefits are in the nature of ancillary services which are not paid till now. The Grid support charges (GSC)/Parallel operation charge has been levied by different state Regulatory Commissions and upheld by APTEL and Supreme Court of India through various orders and hence proposed by OPTCL through a separate petition. OPTCL had filed an application (case No. 44 of 2024) on 26.06.2024 for determination and approval for levy of Grid Support Charges for industries having Captive Generating / Cogeneration plants and running in parallel with the Grids of OPTCL. Hon'ble Commission vide its order in case no. 44/2024 directed OPTCL to submit a consolidated report considering the observations/queries raised by the stakeholders in the earlier Cases filed by OPTCL. In compliance to above, OPTCL has filed the requisite report before Hon'ble Commission on 29.01.2025.

Further, it is submitted that a consumer connected to OPTCL network, pays demand charges for the contracted demand to concerned DISCOMs[. The rationale behind this arrangement is that the corresponding quantum of transmission corridor capacity is reserved for the respective consumer, and only the remaining available capacity in the EHT network is allocated to other consumers. Moreover, it is observed that installed capacity of CGPs are much more than the contracted demand with DISCOMs.

However, it is observed that after synchronization with the grid, CGPs adversely impact grid quality through the injection of harmonics and other disturbances. To address such impacts and ensure grid stability, appropriate charges, namely Grid Support Charges, are required to be levied.

Further, it is submitted that OPTCL has proposed grid support charge factoring the contracted demand signed with DISCOMs by CGPs. So, double charging issue raised by the objector does not arise.

Rejoinder to Para 30:

Necessary system studies are invariably conducted and approvals are granted to RE developers applying for power injection or drawal following the completion of technical and field feasibility assessments.

Further, IT wing of OPTCL has developed a web portal i.e. ***Odisha Grid Insights*** **(OGrI)** portal to publish the key information related to OPTCL EHT Network. This portal will be updated on a monthly basis and will include the following details:

1. Geo-coordinates of all line assets under OPTCL.
2. Present loading data (Minimum & Maximum).
3. Projected load demand within the next 6 months.
4. Transformation capacity.
5. Network status, which will include:
    a. Spare feeders (equipped or not-equipped)
    b. Space available for feeder bays
    c. Possible take-off arrangements (by cable or by overhead)
    d. Evacuation facilities (radial mode or interconnected mode)
    e. Load category (percentage of industrial load vs. domestic load)

The portal is currently operational with most of the above information. The portal can be accessed at the following URL: **https://ogri.optcl.co.in**. This initiative will help RE developers to access the OPTCL network for finding potential injection points.

Rejoinder to Para 31:

Status of key Transmission projects is furnished below:
Project under ISTS

1. **765kV Angul – Gopalpur**
    - Scheduled date of completion – December 2027.
    - CERC yet to issue Transmission license to the L1 bidder under TBCB.
2. **765kV Angul – Paradeep**
    - Scheduled date of completion – November 2026.
    - CERC yet to issue Transmission license to the L1 bidder under TBCB.

Projects under OPTCL

1. **765kV Kolabira**
    - Approved under 21st CMETS-ER dated 22.08.2023
    - Land identification is in progress

2. **400kV Joda/Barbil (Basudevpur)**
    - Approved under 33rd CMETS-ER dated 05.08.2024
    - Land identification is in progress
    - Project will be executed by OPTCL upon finalisation of funding from Govt. and IP approval from Hon'ble Commission.
3. **400kV Ersama**
    - Scheduled date of completion – June 2026
4. **400kV Neulapoi**
    - Approved under 30th CMETS-ER dated 14.05.2024
    - Tender floated, work started

There is no provision of Capacity charges in the extant OERC Transmission Tariff Regulations, 2014. Since Gridco is procuring power through ISTS network, the transmission charges thereof is dealt by Gridco.

Rejoinder to Para 32:

It is intimated that the Business Plan of OPTCL for the 3rd Control Period, i.e., from FY 2024–25 to FY 2026–27, has been approved by the Hon'ble Commission vide Order dated 24.09.2025 in Case No. 20 of 2025.

Rejoinder to Para 33:

The Revised 14th Intra-State Transmission Plan of Odisha for FY 2022–23 to FY 2026–27 has been approved by the Hon'ble Commission vide Case No. 08/2024. Recently, the investment proposals for 37 projects were heard after inviting suggestions and objections from the general public.

Rejoinder to Para 34:

No GCC meeting has been conducted in FY 2023-24 and 01 no. GCC meeting has been conducted in FY 2024-25. The details of recent GCC meeting conducted is furnished below:

GCC meeting	Date of meeting
17th GCC meeting	17.01.2025
18th GCC meeting	03.09.2025

OPTCL has already sought agenda items from various stakeholders for the 19th GCC meeting. Further, upon finalization of the agenda, the GCC meeting will be convened shortly. The amount proposed under GCC head will be utilised fully.

Rejoinder to Para 35 & 37:

Initially construction of 400/220kV AIS S/S at Remuli along with associated lines was planned for TBCB . Subsequently, State Government after careful consideration have

been decided to construct 400/220kV AIS S/S Remuli(at Basudevpur) and establishment of 2x160 MVA, 220kV GIS S/S at existing Barbil GSS along with associated 400kV & 220kV lines on cost plus method instead of TBCB mode. Accordingly, at present, there is no proposal for execution of any project under TBCB mode.

OPTCL has standardized technical specifications for transmission line towers/steel poles, power transformers, switchgear, surge arresters, CTs, PTs/CVTs, conductors, insulators, fire fighting systems, lighting systems, AC/DC systems, etc., and continues to incorporate improvements as identified for further refinement

Rejoinder to Para 36:

OPTCL maintains an in-house oil testing laboratory that serves as the central facility for analyzing oil breakdown voltage, dissolved gas analysis and PPM measurements. A relay testing laboratory is also planned. OPTCL will approach the Government of Odisha for funding to obtain National Accreditation Board for Testing and Calibration Laboratories (NABL) accreditation for both laboratories.

Rejoinder to Para 37:

Already explained at para 35 above.

Rejoinder to Para 38:

OPTCL will take up the proposal of converting Switching Station to Substation based on the demand projection of DISCOMs and the proposal received by RE developers on a case to case basis with the approvals of Hon'ble Commission.

Rejoinder to Para 39:

The respondent's suggestion has been noted and OPTCL will include the details of loading pattern in the ARR filing of the coming years. Invariably, OPTCL has been sharing the details of loading pattern of all the ICTs, Auto & Power transformers in L-9 format (OERC approved format) as a part of ARR filing every year. Further, loading details corresponding to the maximum demand of **7069.89 MW** on 12.08.2025 has been provided in Compliance to the OERC queries on ARR application of OPTCL in case no. 121/2025.

Rejoinder to Para 40:

Since the creation of transmission infrastructure requires huge investments, OPTCL always requests the state Government for financial support. State Govt. has been contributing 100% financial assistance in the shape of grant/equity in case of non-remunerative and contributing 30% equity support in case of remunerative projects.

NOTARY NATABAR MOHANTY BHUBANESWAR OA 20794 05.07.2026 GOVT. OF ODISHA

Rejoinder to Para 41:

To prevent overloading, regular system study has been carried out and augmented the network capacity as and when required. Priority has been given to use the under loaded network. As directed by Hon'ble Commission, regular meetings are being conducted with DISCOMs for creation and timely completion of downstream infrastructure for optimum utilization of transmission networks. New Transmission elements proposed by OPTCL to strengthen state evacuation are deliberated and approved in the CMETS-ER meeting, held on monthly basis which are further incorporated in National Transmission Network. At present, OPTCL is implementing the STAMS project, under which all network parameters will be monitored centrally. This will enable system operators to take prompt corrective actions, thereby enhancing grid stability and improving overall system efficiency. Further, OPTCL has planned for AI based inspection & maintenance of the Transmission lines and also planning for Asset Performance Management System with AI capabilities for predictive maintenance of its transmission assets.

Rejoinder to Para 42:

As per the provisions of Sections 39 and 40 of the Electricity Act, 2003, OPTCL, being the State Transmission Utility (STU), is responsible for the planning and development of the transmission infrastructure in the State of Odisha. OPTCL obtains inputs from DISCOMs, industries, and generators, and thereafter prepares a comprehensive Intra-State Transmission Plan considering various loading conditions. All new transmission proposals are duly approved by the Hon'ble Commission through the Transmission Planning, Business Plan, and Investment Proposal approval process, wherein DISCOMs and the State Government are among the respondents.

Further, consultations are held with stakeholders through Transmission and Distribution Coordination Committee (TDCC) meetings, Grid Coordination Committee (GCC) meetings, and meetings at the Government level to ensure the optimal utilization of OPTCL's transmission system.

Rejoinder to Para 43:

OPTCL always executes its projects which are either approved in Business Plan of OPTCL or Intra State Transmission Plan. As per the license conditions, OPTCL is mandated to take prior approval of Hon'ble Commission for any transmission projects above Rs. 10 Cr. which OPTCL has been following scrupulously.

Rejoinder to Para 44:

The concern has already been addressed in para 40.

Rejoinder to Para 45:

Transmission loss in OPTCL is computed based on the Pool Cost data received from GRIDCO and the Energy Flow Statement issued by SLDC, both of which are prepared using data recorded by energy meters.

Rejoinder to Para 46:

Some of the innovative technologies adopted in OPTCL as under:

- OPTCL has successfully implemented digital substation technology at the 132/33 kV Agalpur–Rampur GSS, wherein fiber optic cables are used in place of conventional copper control cables to transmit current, voltage and control signals digitally. In this system, loss-causing copper elements are eliminated and replaced with fiber optics. Such incremental technological improvements collectively contribute to the reduction of transmission losses.

- Further, OPTCL is continuously replacing existing conductors in transmission lines, where thermal loading is approaching limits, with High Temperature Low Sag (HTLS) conductors, which have lower resistance compared to conventional ACSR conductors.

- On an experimental basis, OPTCL has installed a Fiber Optic Current Transformer (FOCT) at Chandaka GSS, thereby eliminating the need for conventional current transformers.

- Furthermore, OPTCL is augmenting age-old transformers with new, energy-efficient transformers, replacing old conductors with new ones, converting radial lines into ring mains, and upgrading single-circuit (S/C) lines to double-circuit (D/C) lines. All these measures collectively result in an overall reduction in transmission losses.

Rejoinder to Para 47:

The following outlines OPTCL's step-by-step Cyclone Mitigation Plan for Odisha's transmission & distribution network. It addresses Commission directives on adequate spares, Emergency Restoration System (ERS), mobile substations, and faster restoration following cyclones.

STEP-BY-STEP CYCLONE MITIGATION PLAN

Governance & Activation:

a) Overall command during a cyclone emergency rests with the Incident Commander, normally the CMD or Managing Director of OPTCL. Sr. General Manager of each zone control field operations, while the State Load Despatch Centre provides real-time grid coordination.

b) This command structure is activated the moment the India Meteorological Department (IMD) issues a cyclone watch or warning. A watch triggers a pre-impact alert; a warning of landfall within forty-eight hours or confirmed multi-tower failures escalates the plan to full mobilisation.

c) State Government bulletins and ground observations supplement the IMD alerts.

Pre-season Preparedness:

a) Every year between January and March, before the cyclone season begins, OPTCL updates a detailed coastal risk map covering a sixty-kilometre buffer from the shoreline. Priority circuits and substations are listed in the Power Atlas and circulated internally.

b) All two strategic depots—Mancheswar and Chatrapur—are audited to verify the availability of Emergency Restoration System (ERS) towers, spare transformers of various MVA ratings, extra-high-tension conductors, insulators, diesel-generator sets and de-watering pumps. Inventory is replenished to maintain at least a 5% maintenance buffer.

c) During this period, right-of-way corridors are cleared and trees trimmed, short-span interpositions are inspected, and a full functional check is performed on SCADA, OPGW, VSAT and satellite-phone links. Round-the-clock control rooms are tested to ensure operational readiness.

Pre-impact Measures:

a) Once the IMD issues a watch or warning, the Incident Commander issues a formal mobilisation order. This specifies the ERS kits, cranes, truck-mounted 33 kV mobile substations, spare transformers and diesel generators required for each corridor, along with designated staging points.

b) Crews, equipment and at least one ERS kit per priority corridor are moved to pre-cleared rally points, with police and forest permits already in place. Rate-contract gangs are activated.

c) Where necessary, the grid is reconfigured or islanded in advance to reduce cascade risk and to preserve supply to critical facilities such as hospitals, water-supply systems and telecom nodes.

During the Cyclone:

1. Safety is paramount. Field work is suspended whenever sustained wind speeds exceed safe operating limits, and all on-site activity resumes only with clearance from the Safety Officer.
2. Control rooms remain staffed around the clock. SCADA and VSAT systems continue to provide live status updates, and hourly situation reports are transmitted to the State Load Despatch Centre.

Immediate Restoration (First 72 Hours):

I. Within six to twelve hours of landfall—once conditions allow—assessment teams use drones and ground patrols to identify and geo-tag damage. ERS towers are deployed rapidly to bypass collapsed structures and to re-establish ring feeds, giving priority to feeders that supply hospitals, water works and essential communications.

II. If ERS deployment alone cannot restore local grids, truck-mounted 33 kV mobile substations are sent to key district hubs within the sixty-kilometre coastal belt. Diesel generators pre-installed at substations provide auxiliary power to support these operations and enable permanent repairs.

Medium-Term Recovery (Up to 14 Days):

10. Temporary ERS installations are replaced with permanent towers and foundations designed for Wind Zone VI conditions. Conductors are re-strung and insulators—preferably long-rod or silicone composite for saline environments—are repaired or replaced. Transformer and other high-tension equipment are inspected and restored.
11. Depots are immediately replenished and purchase orders raised to replace used ERS components, conductors and insulators. All regulatory incident reports and applications for State and National Disaster Response Funds are filed as required.

Long-Term Mitigation:

15. Beyond immediate restoration, OPTCL continues to strengthen the network. The DRPS Phase II programme accelerates underground cabling of the most vulnerable urban and coastal corridors and upgrades overhead lines with shorter spans and higher wind-rated towers.
16. A permanent fleet of 33 kV truck-mounted mobile substations will be procured and stationed at DRC hubs so that each coastal division has dedicated rapid-response capacity. An ERS Division—headquartered in Bhubaneswar is being institutionalized to maintain equipment, conduct training and manage mutual-aid agreements with neighbouring utilities and POWERGRID for cranes and heavy hardware.

Capacity Building and Oversight:

13. All ERS crews undergo annual table top and field drills, including full tower erection and mobile-substation commissioning. Weekly patrols, thermo-vision inspections and safety audits are mandated for coastal towers, and results are logged centrally.
14. Recently a five-day mock exercise on the erection of 400 kV ERS towers and stringing of ACSR Twin Moose Conductor was conducted near Bhubaneswar Baliyatra Ground. The program was designed as a refresher and capacity-building initiative, enabling OPTCL engineers to gain hands-on exposure to ERS tower components, erection procedures, and stringing operations. This exercise not only helped in familiarization and skill enhancement but also strengthened the preparedness of field engineers to effectively respond during exigencies and restoration scenarios.
15. During any event, daily restoration reports are sent to the Odisha Electricity Regulatory Commission and the State Disaster Management Authority, followed by a formal after-action review within seven days.

Regarding design of Multi circuit tower

OPTCL has already standardized the design of multi-circuit towers. At present, such towers are being used in the 220 kV Pandiabil–Samangara transmission line. Further, in many upcoming projects, wherever required, multi-circuit towers are planned to be adopted.

Rejoinder to Para 48:

Soft copy of the Compliance to OERC queries on ARR application of OPTCL for FY 2026-27 will be forwarded along with this reply.

2. The objections not specifically admitted may be deemed to have been denied.

PRAYER

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections and prayers of M/s. Power Tech Consultants while approving ARR and Transmission Tariff of OPTCL for FY 2026-27 & Truing up application for FY 2024-25.

By the Applicant
Through

Sr. GM (El.), RT&C

Bhubaneswar
January 27, 2026



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Annexure-01

ODISHA ELECTRICITY REGULATORY COMMISSION
BIDYUT NIYAMAK BHAWAN
PLOT NO.4, CHUNOKOLI, SHAILASHREE VIHAR,
BHUBANESWAR - 751021
TEL. No. 2721048, 2721049, FAX: 2721053/2721057
E-mail: orierc@gmail.com
Website: www.orierc.org

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No. DIR (T)-332/2008/ 177
Dt. 01.02.2021

To

The Managing Director,
OPTCL,
Janpath, Bhubaneswar-22.

Sub: Billing procedure consequent upon implementation of new Open Access Regulations, 2020.

Ref: Your letter No. RT&C-47/2020/18(3) dt.08.01.2021.

Sir,

In inviting a reference to the subject mentioned above, it is to intimate you that transmission tariff of OPTCL is governed under OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 which is still in force.

Regulation 6.5 of Transmission Tariff Regulation, 2014 states as follows:

*"**Transmission Tariff:** The Transmission Tariff payable by the Beneficiaries of the Transmission System shall be designed to recover the Aggregate Revenue Requirement approved by the Commission for each year of the Control Period."*

Regulation 2.1(h) of the same Regulation states that a distribution licensee shall necessarily be a long term transmission customer for which it shall be required to enter into a transmission service agreement with the transmission licensee.

Aggregate Revenue Requirement of the transmission licensee is recovered from the beneficiaries DISCOMs who are long term open access customers. The Commission carryout true up exercise under the same Regulation basing on the actual expenses booked in the audited books of the account of the transmission licensee for the year and expenses allowed in the ARR for the corresponding financial year. Therefore, the approved ARR of the transmission licensee is well taken care of for any short fall on this account. The STU has entered into transmission service agreement with the DISCOMs accordingly.

O/C

The Open Access Regulation, 2020 stipulates that the open access customer who wishes to avail open access under that Regulation shall have to apply for the same. DISCOMs do not come under the same and are governed under Transmission Tariff Regulation, 2014 and consequential special transmission service agreement. The long term customer other than the DISCOMs shall come under OERC Open Access Regulation, 2020.

Therefore, you are required to follow OERC Transmission Tariff Regulation, 2014 scrupulously as long as it is in force.

Yours faithfully,

SECRETARY 1.2.2021

Annexure-02

सत्यमेव जयते

अखिल भारतीय विद्युत सांख्यिकी

All India Electricity Statistics

सामान्य पुनर्विलोकन 2025

(2023-24 के आंकड़े समाविष्ट)

General Review 2025

(Containing Data for the Year 2023-24)

भारत सरकार
विद्युत मंत्रालय
केंद्रीय विद्युत प्राधिकरण
नई दिल्ली
नवंबर 2025

Government of India

Ministry of Power

Central Electricity Authority

New Delhi

November 2025

(अधिनियम 2003 की धारा 73 (आई) एवं (जे) के तहत के. वि. प्रा. के दायित्व के पालन हेतु प्रकाशित)

(Published in fulfilment of CEA's obligation under Section 73(i) & (j) of the Electricity Act 2003)

Table 6.2
Regional Transmission Losses
Utilities
2023-24

Region	Energy Available in the Region (GWh)	Export to other Region (GWh)	Export to Nepal (GWh)	Export to Bangladesh (GWh)	Export to Bhutan (GWh)	Export to Myanmar (GWh)	Total Energy drawal by States/Utilities (GWh)	Transmission Losses (GWh)	Transmission Losses (%)
1	2	3	4	5	6	7	8	9 (2-3-4-5-6-7)	10((8/2)x100)
Northern Region	234996.97	3117.23	170.57	0.00	0.00	0.00	224302.97	7406.20	3.15
Western Region	332120.58	99896.14	0.00	144.00	0.00	0.00	221708.25	10372.19	3.12
Southern Region	212787.85	4758.03	0.00	0.00	0.00	0.00	200663.51	7366.31	3.46
Eastern Region	142021.92	55318.56	1254.36	7315.07	1330.61	0.00	70787.65	6015.68	4.24
North Eastern Region	19710.81	3117.64	0.00	1072.11	0.00	8.47	14746.36	766.23	3.89

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur
Bhubaneswar-751021

Case No: 121/2025
Filing No: 1

IN THE MATTER OF:

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022.

... Applicant

AND

IN THE MATTER OF:

The Utkal Chamber of Commerce & Industry Ltd. (UCCI), N-6, IRC Village, Nayapalli, Bhubaneswar–751015, Email: pwrtch@gmail.com, contactus@utkalchamber.in, Phone-9437155337

...Respondent

The humble respondent above named most respectfully submit as under:

1. That, the Respondent, Utkal Chamber of Commerce & Industry Ltd. (UCCIL), N-6, IRC Village, Nayapalli, Bhubaneswar – 751015 is represented by its Member Industries drawing power at EHT, HT & LT as well having Independent Power Producing Units, Captive Power Plants in the State of Odisha and the present objections are filed in general on behalf of the said member industries through Expert Committee for Power and Electricity.

2. UCCIL is submitting the following points on the application of OPTCL for determination of Annual Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 for kind review and necessary action by the Hon'ble Commission.

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3. Human Resources Expenses:

That OPTCL has projected Employee Cost expenditure at Rs. 531.52 Crore for FY 2026-27 against Rs. 488.63 Crore as approved by the Commission to be spent during FY 2025-26. The summary of Employee Expenses of OPTCL for the last sixteen financial years is furnished below.

Summary of Employee Expenses

Financial Year	Proposed	Approved	Actual
2010-11	865.13	279.56	173.11
2011-12	952.06	338.14	279.56
2012-13	655.36	318.48	268.59
2013-14	341.2	289.3	191.70
2014-15	361.38	318.18	309.59
2015-16	310.02	305.23	285.95
2016-17	399.56	292.55	382.44
2017-18	462.33	304.5	380.32
2018-19	419.57	360.4	375.65
2019-20	421.99	419.77	394
2020-21	466.22	415.87	373.19
2021-22	532.73	457.88	474.83
2022-23	526.53	477.19	
2023-24	508.76	449.08	
2024-25	582.06	488.63	
2025-26	554.05	488.63	
2026-27	531.52		

OPTCL may provide a detailed employee list cadre wise approved sanctioned strength by Govt. of Odisha vis-avis actual post filled up and post laying vacant.

The cost break-up of the employee expense is provided below:

Sl. No	Particulars	Prev. Year 2024-25	Curr. Year 2025-26	Ensuring Year 2026-27
A	**Salary & Allowance**	1	2	3
1	Basic Pay	151.82	158.83	159.57
2	Dearness Allowance	79.79	96.89	102.12
3	House Rent Allowance	25.25	23.89	25.77

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4	Medical Allowances	7.66	8.34	8.38
5	Conveyance Expenses (Allowance + Reimbursement)	4.13	4.08	6.28
6	Other Allowance	1.63	1.70	1.81
7	Bonus	0.18	0.20	0.20
8	Stipend for New Recruitment	8.09	4.05	5.70
9	Stipend to Apprentice	1.45	2.00	2.08
10	Arrear Salary for Wage Board Revision			
	Sub-total (A)	280.00	299.59	311.91
B	**Additional Employee Cost**			
1	Out Sources Engagement	3.78	4.34	7.01
	Sub-total (B)	3.78	4.34	7.01
C	**Other Employee Cost**			
1	Leave Travel Concession	0.15	0.59	0.59
2	Honorarium	0.10	0.12	0.19
3	Ex-gratia	6.44	6.50	7.92
4	Staff Welfare Expenses	4.48	7.94	12.02
5	Other Employee Cost	-	0.03	0.04
6	Capacity Building Charges	1.30	2.00	2.40
	Sub-total (C)	12.48	17.19	23.16
D	**Terminal Benefits**			
1	Pension	135.94	140.02	144.22
2	Gratuity	13.22	13.62	14.03
3	Leave Salary	19.91	20.51	21.12
4	Other (including contribution to NPS)	24.46	24.99	26.47
	Sub-total (D)			
E	**Total Employees Cost (A+B+C+D)**	489.78	520.26	547.93
F	Less: Employees Cost Capitalised	16.40	16.40	16.40
G	**Net Employee Cost (E- F)**	473.38	503.85	531.52

1. **Basic Pay and Grade Pay:** Basic Pay and Grade Pay proposed for FY 2026-27 = Rs. **159.57** Cr. is based on actual cash flow for FY 2025-26 with additional increment of 3% and average number of employees. OPTCL is planning to recruit 250 Nos. employees during FY 2025-26 and 50 Nos. in FY 2026-27.
2. **DA:** OPTCL proposed 64% DA for FY 2026-27, considering Finance Dept guidelines. However, actual increases in DA may be reviewed.
3. **HRA:** OPTCL proposed HRA @19%. Actual cash flow may be considered.

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4. **Outsourcing:** OPTCL is functioning with 50% of manpower and has outsourced services. Accordingly, Rs. 7.01 Cr. has been proposed towards payment to outsourced personnel. The same can be reviewed.

5. OPTCL is planning to recruit 250 Nos. employees during FY 2025-26 and 50 Nos. in FY 2026-27 and has proposed Rs.05.70 Cr. towards stipend for the new recruiters. Considering the past trend of recruitment the same may be reviewed.

6. Actual addition of employees is lesser than the approved. Stipend and employee cost should be approved by reviewing proposed addition of employees.

7. Terminal benefits should be reviewed on an actual cash flow basis.

Hence the Employee cost Expenses of OPTCL for FY 2026-27 may be approved accordingly by the Hon'ble Commission.

1. Repair and Maintenance (R&M) expenses

That OPTCL has projected Repair and Maintenance Expenses at Rs. 259.65 Cr for FY 2026-27 against Rs. 160 Crs as approved by the Commission to be spent during FY 2025-26.

The summary of Repair and Maintenance (R&M) expenses of OPTCL for the last sixteen financial years is furnished below.

Summary of R & M Cost

Financial Year	Proposed	Approved
2010-11	98.14	60
2011-12	93.89	75
2012-13	95.46	95
2013-14	108.91	60
2014-15	146.77	93
2015-16	154.11	108
2016-17	170.66	110.59
2017-18	155.11	124.97
2018-19	156.19	111
2019-20	115.22	115.22
2020-21	140.59	115.22
2021-22	151.1	118.61
2022-23	148.04	110.5
2023-24	164.34	135
2024-25	169.3	135
2025-26	217.7	160

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2026-27	259.65	

It is respectfully submitted that R&M cost of OPTCL for FY 2026-27 may be approved accordingly by the Hon'ble Commission.

2. Administration & General Cost

That OPTCL has projected Administrative and General (A&G) expenditure at Rs. **46.95 Crs** for FY 2026-27 against Rs. **42.46** Crs as approved by the Commission to be spent during FY 2025-26.

The summary of Administrative and General Expenses of OPTCL for the last sixteen financial years is furnished below.

Summary of A&G Cost

Financial Year	Proposed	Approved
2010-11	26.99	15.14
2011-12	38.34	18
2012-13	39.11	21.25
2013-14	23.09	22.39
2014-15	25.46	24.01
2015-16	32.36	24.37
2016-17	25.58	24.66
2017-18	26.11	25.6
2018-19	27.23	26.44
2019-20	28.07	27.55
2020-21	28.66	28.72
2021-22	38.13	30.35
2022-23	43.18	37.73
2023-24	47.07	40.28
2024-25	51.13	37.05
2025-26	49.8	42.46
2026-27	46.95	

The Hon'ble Commission may review the Inspection fee expenses and training expenses. Details of the training calendar and its benefits may be checked.

3. Depreciation Cost

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That OPTCL has projected depreciation expenditure at Rs. 337.09 Crs for FY 2026-27 against Rs. 284.33 Crs as approved by the Commission to be spent during FY 2025-26.

The summary of Depreciation of OPTCL for the last sixteen financial years is furnished below.

Summary of Depreciation Cost

Financial Year	Proposed	Approved
2010-11	153.31	76.6
2011-12	156.4	79.42
2012-13	155.99	78.57
2013-14	172.85	89.4
2014-15	176.02	92.71
2015-16	197.72	107.48
2016-17	150.5	101.45
2017-18	192.59	130.76
2018-19	217.9	145.43
2019-20	186.03	162.06
2020-21	208.59	195.59
2021-22	276.5	232.95
2022-23	263	233.57
2023-24	293.96	269.54
2024-25	320.03	275.67
2025-26	356.57	284.33
2026-27	337.09	

- Norms of tariff regulations and rates as specified in the Transmission Tariff regulations should be considered.
- The depreciation should be determined after due scrutiny.

4. OPTCL has only considered 275.35 Cr towards miscellaneous receipts which needs to be checked prudently. As per regulation 8.30 & 8.40 of Transmission Tariff Regulation all these expenses are to be deducted in full from the ARR for the purpose of calculation of tariff of OPTCL.

5. Annual Revenue Requirement:

That the OPTCL has given the proposal for an annual revenue requirement of Rs. 1765.40 Crore for FY 2026-27 against Rs. 1331.02 Crore as approved by the Commission to be spent during FY 2025-26.

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The summary of ARR of OPTCL for the last fifteen financial years is furnished below.

Financial Year	Proposed	Approved
2011-12	1435.88	579.34
2012-13	1348.46	612.53
2013-14	874.74	597.87
2014-15	988.8	641.3
2015-16	1008.36	630.94
2016-17	975	623.25
2017-18	1013.63	639.4
2018-19	990.65	659.95
2019-20	861.27	706.71
2020-21	966.44	713.84
2021-22	1307.17	792.93
2022-23	1247.14	831.95
2023-24	1102	896.18
2024-25	1380.69	913.7
2025-26	1663.33	1331.02
2026-27	1765.40	

Hence the Annual Revenue Requirement of OPTCL for FY 2026-27 may be approved accordingly through a prudence check and based on the submission made above by the Respondent.

6. Determination of Transmission Charges

OPTCL has given the proposal for transmission charges @ **35.61 P/U** for FY 2026-27 against 25.5 P/Unit as approved by the Commission during FY 2025-26. The proposed Transmission Tariff of **35.61 P/U** is very high and should not be permitted. This will adversely affect the RST of the DISCOMS and will be a huge burden on the consumers of Odisha. Therefore, it is respectfully submitted that the Transmission charges levied by OPTCL should be substantially reduced to provide relief to the EHT consumers.

7. The proposal by OPTCL to disallow the rebate on prompt payment for Open Access customers, particularly Long & Medium-Term Open Access customers, needs to be carefully reviewed in the context of its impact on customer relations, operational efficiency, and regulatory guidelines.

While OPTCL has cited that there is no provision for rebate for early payment in the Open Access Regulations of 2020, the previous practice of offering a 2% rebate for payments made within two days was beneficial in encouraging timely payments and improving the cash flow for OPTCL. Discontinuing this rebate may have adverse effects

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on the payment behavior of Open Access customers, leading to potential delays in payment and reduced financial liquidity for OPTCL.

It is also essential to consider the implications of such a move on the competitiveness and attractiveness of Odisha's transmission system to potential Open Access customers. Providing financial incentives, such as the prompt payment rebate, could serve as a mechanism to retain customers and ensure a smoother cash flow for OPTCL. Additionally, a shift in policy might need to be discussed and approved by the Commission to ensure it aligns with the broader regulatory framework and customer service goals. In light of these factors, it is proposed that OPTCL may reconsider the discontinuation of the rebate, or alternatively, propose a revised rebate structure that balances the financial interests of both OPTCL and its Open Access customers. The Commission's input and further deliberation on the matter may be necessary to ensure that the policy is fair, transparent, and in the best interest of all stakeholders.

8. The Open Access Regulations, 2020 treat the DISCOMs and other Open Access users like CGP, and Industrial Consumers on the same footing. However, exceptions is being carved out, wherein the DISCOMs need not submit their contracted quantity and are allowed to pay Transmission Charges on the actual energy transacted, whereas the other OA customers like CGPs, Industries are being forced to pay the Transmission Charges on the Contracted Quantity. Further, OPTCL has proposed to do away with the prompt payment rebate for OA customers like CGPs and Industries while allowing the prompt payment rebate benefit to DISCOMs. This type of differential treatment is against the Open Access Regulation, Grid Code, and statutory provision under the Electricity Act 2003. Therefore, it is requested that the Commission to treat all the Transmission Users i.e. CGPs, Industries, and DISCOM on the same footing with provision for charges, and rebates on the same principle without any discrimination.

9. Transmission Loss:

OPTCL has proposed transmission loss at 3.05%. In conformity with the power sector reform, OPTCL needs to reduce the transmission loss significantly. We propose to approve transmission loss of OPTCL at 2.5%.

That OPTCL has not yet identified the areas where loss is maximum and OPTCL needs to formulate action plans for loss reduction. OPTCL should inform the methodology adopted to estimate the transmission loss for every year. OPTCL should have undertaken energy audits of lines and substations to know the quantum of transmission loss in the system. Proposing the transmission loss arbitrarily without giving the breakup of the losses in different components of transmission system i.e., lines, substations, power transformers and auto transformers etc are not appropriate for the S.T.U. Thus proposing loss as per the business plan is meaningless. There is enough measure by which OPTCL could reduce the Transmission loss. OPTCL should conduct energy audits and their standard performance should be monitored by a third party

auditor appointed by the Commission so as to assess the actual performance of the licensees.

It is prayed before the Hon'ble Commission may kindly re-calculate and approve transmission loss accordingly.

10. That earlier CGPs used to inject inadvertent power to the grid and GRIDCO availed the benefits of inadvertent power. GRIDCO also used to pay the hydro pool cost towards the inadvertent power. However, from FY 2019-20 onwards GRIDCO has stopped making payment towards inadvertent injections. Hence, OPTCL became the ultimate beneficiary of such injection of inadvertent power. We pray to the Hon'ble Commission to direct OPTCL to submit the detailed list of inadvertent injection for each month by each CGP and consider the same as an additional injection to the grid accordingly to calculate the transmission loss. The data of inadvertent injection is available with OPTCL and SLDC for each month for each CGP who are connected to EHT transmission system of OPTCL. The entire stakeholder and consumers of Odisha will be benefitted by such methodology as the intra-state transmission loss will reduce significantly.

11. Given the significance of maintaining transparency and accuracy in the transmission system's performance, it is requested that OPTCL conduct a Third-Party Energy Audit of its transmission loss. The energy audit should be carried out by an accredited energy auditor in line with the guidelines specified by the regulatory authorities.

The requirement to conduct an annual energy audit is crucial not only for assessing transmission losses but also for identifying potential inefficiencies and implementing corrective actions that can help in optimizing the system's overall performance. This audit will provide an independent, unbiased evaluation of the transmission system's energy losses and help in formulating strategies for loss reduction, which will ultimately contribute to improving the operational efficiency and financial health of OPTCL.

12. Open Access Charges:

Each year Hon'ble OERC informed OPTCL to submit 400 kV, 220 kV, 132 kV Power Transformer and EHT lines loading. OPTCL should make a practice to submit the Power flow data for 400 kV, 220 kV line and 132 kV line and its loading and the entire Auto-transformer loading, Power Transformer and ICT loading along with the ARR application. Moreover, by submitting only power transmitted on the peak demand day will not solve the purpose. In order to ascertain the margin availability, OPTCL may be directed to submit the maximum power handling capability, power flow and % loading of all the 400 kV, 220 kV, 132 kV line and Power Transformer, Auto Transformer, ICT Transformers. It is also desired that OPTCL should conduct load flow analysis to handle around 2000-3000 MW differential load in appropriate manner.

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Once these data are made available, it can be ascertained that, there are sufficient margin is available in the transmission network and in order to utilize it fully, STOA should be promoted and the charges for the same may be kept at 1/4 of the MTOA and LTOA charges and necessary amendments in the regulations may be made.

13. Introduction of Reactive Energy Charges:

OPTCL has proposed to introduce Reactive Energy Charges of 3 Paise / kVARh which is very high and should be reduced in consultation with various stakeholders.

14. Levy of Grid Support Charge for connectivity:

OPTCL has submitted an application to the Hon'ble OERC on 26.06.2024, to determine and approve the imposition of Grid Support Charges for industries with Captive Generating/Cogeneration plants that operate alongside the OPTCL grids.

The case was registered as OERC Case No.-44/2024. In an order dated July 6, 2023, the High Court suggested that if OPTCL wishes to pursue the imposition of Grid Support Charges, they should file a separate application with the OERC. The court emphasized that the OERC, under Section 181 of the Electricity Act, should examine the justifiability of such charges. Hon'ble Commission in order dated 09.07.2024 in case no 44 of 2024 has directed OPTCL to submit a consolidated report considering certain queries. OPTCL has submitted the report on 29.01.2025.

15. It is prayed before the Hon'ble Commission that the levy of Grid Support Charges (GSC) on Captive Generating Plants (CGPs) be abandoned. CGPs are operated by industries that already have a contract demand with the respective DISCOMs, which means they are contributing to the grid through their contracted capacities. The imposition of GSC on CGPs would lead to a scenario where industries are effectively being charged twice for grid support – once through their contract demand with DISCOMs and again via the proposed GSC.

This double charging would result in an unfair financial burden on industries that are already supporting the grid by paying for their contractual obligations. Such a practice could discourage further industrial investments in renewable energy projects, which is counterproductive to the state's objectives of promoting sustainability and industrial growth. Therefore, in the interest of fairness and to avoid unnecessary financial strain on industries, OPTCL should abandon the proposal to levy GSC on CGPs. This would ensure that industries are not unfairly penalized for their contribution to the grid, while also promoting the continued growth of renewable energy in Odisha.

16. It is proposed that OPTCL should proactively prepare and maintain a monthly status report outlining the available transmission lines, substation details, bay availability, and transformer capacity. This would enable prospective developers to assess the existing infrastructure and apply for an NOC for grid connectivity before

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submitting their applications to the RE nodal agency. By making this information accessible, OPTCL can streamline the process for developers, allowing them to submit their grid connectivity applications with more certainty.

Under the current practice, OPTCL does not conduct a prepaid system study unless the project has received approval from a nodal agency. However, it is recommended that OPTCL issue the NOC for grid connectivity based on the available infrastructure information, without requiring a prepaid system study at this early stage. The detailed prepaid system study can be conducted later, once the project has been approved by the relevant nodal agency. This approach would help accelerate the approval process and ensure timely facilitation of renewable energy projects in Odisha, while ensuring that the system remains aligned with the capacity of existing transmission infrastructure.

17. OPTCL may be directed to submit the current status of the 765 kV transmission network plan, specifically for the two 765 kV ISTS lines: Angul to Gopalpur and Angul to Paradeep, as well as the status of the 765 kV substation in the Kolabira area. In addition, OPTCL should provide detailed updates on the progress of transmission projects such as the Paradeep-Mahakalapada 765 kV line, the 400 kV substations at Joda, Ersama (Paradeep), and Neulapoi.

Furthermore, OPTCL should inform the Commission about the likely transmission and capacity charges for these projects, ensuring that they are transparent and justifiable. These charges should be subject to a prudence check by the Hon'ble OERC to assess whether they adequately serve the interests of consumers and the state. In cases where the charges do not align with the best interests of the consumers and the state, the Commission may not approve the proposed capital expenditure plan and tendering process. In such instances, OPTCL should be instructed to initiate a fresh tendering process under the Intra-State Transmission Plan to ensure that the most optimal and cost-effective solutions are selected.

18. Transmission business being a capital intensive projects requires long term planning. Therefore, Hon'ble OERC may direct OPTCL to submit MYT tariff and long term Business Plan based on which Investment Plan should be provided.

19. That Intrastate transmission system should be developed in a coordinated manner in consultation with CTU, State govt., Generating companies, Regional Power Committees, CEA & licensees. However such grid coordination meetings are not happening regularly. It is proposed that the grid coordination committee meeting may be conducted regularly. Nos of industries are facing lots of difficulties in getting grid connectivity and enhancement of contract demand. Even the Hon'ble OERC has directed to hold a meeting of OPTCL with DISCOM on a monthly basis to ensure smooth operation of the power sector and MOM to be furnished to OERC. The Hon'ble OERC in its earlier transmission tariff order dated 13.02. 2024 in case no. 113/2023 has directed to submit the revised 14th inter-state transmission plan of OPTCL for approval. OPTCL

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may kindly submit the status of the 14th inter-state transmission plan of OPTCL and stage wise implementation plan.

20. The Hon'ble OERC has published the OERC (Development of Intra-State Transmission Projects through Tariff Based Competitive Bidding in the State of Odisha) Order, 2022. OPTCL may be directed to submit an action taken report towards execution of new transmission projects. The Hon'ble OERC has earlier directed OPTCL to standardized the transmission line tower, multi-circuit tower etc. the Hon'ble OERC may pass appropriate order.

21. Further, it is proposed that OPTCL should set up an independent testing lab accredited by NABL for testing relays, meters, transformer oils so that such facilities can be availed by industries.

22. It is noted that OPTCL has claimed ₹0.35 Cr towards annual Grid Coordination Committee (GCC) expenses. However, the respondent seeks clarification from OPTCL regarding the number of GCC meetings conducted during FY 2023-24, FY 2024-25 and FY 2025-26. Additionally, OPTCL should provide details of the outcomes from each GCC meeting or make this information publicly available on its website for transparency and accountability.

The respondent further understands that, as per the provisions of Chapter 11, Clause 2 (2) of the Odisha Grid Code Regulation, 2015, there appears to be a lack of GCC meetings being held in the prescribed manner. It is crucial that the objectives of the GCC, which are to ensure efficient coordination between transmission, distribution, and generation entities, are met as per regulatory requirements. Therefore, OPTCL should clarify the status of GCC meetings, as well as any actions taken to address this issue, ensuring compliance with the Grid Code and the effective functioning of the transmission and distribution system in Odisha.

23. It is proposed that OPTCL should conduct a feasibility study to assess the potential of converting the existing 26 numbers of 132 kV switching stations into 132/33 kV substations. This conversion would involve establishing additional bays and installing 132/33 kV transformers, thereby enhancing the capacity to accommodate the future load requirements of DISCOMs. The proposed upgrade would not only cater to the increasing demand from existing consumers but also provide a critical infrastructure platform for connecting future renewable energy (RE) projects, particularly solar power plants, into the grid. This conversion aligns with the growing need for decentralized and renewable energy sources, which are integral to meeting the State's sustainability and decarbonisation goals. By expanding the grid infrastructure, OPTCL can ensure that the transmission network is future-proofed to handle an influx of renewable energy, which is expected to play a key role in Odisha's energy transition. Moreover, this initiative will reduce the load on existing substations and improve the overall grid stability, enabling efficient power distribution across the state. Therefore, a comprehensive feasibility study by OPTCL will allow for a detailed assessment of

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technical, economic, and environmental implications, thereby ensuring that the infrastructure investments are both optimal and sustainable in the long term.

24. OPTCL should make a standard practice to prepare its ARR application and insert these regular features during the ARR application stage considering all relevant query of Hon'ble OERC. This will be quite helpful for the Respondents as well as for the officials of Hon'ble OERC for conducting proper analysis and scrutiny.

25. The Commission should direct OPTCL to engage with the Government of Odisha to secure funding for economically unviable projects and other critical infrastructure developments that serve the larger interest of the State. Many transmission projects, though essential for grid reliability, regional development, and equitable power access, may not be financially viable solely through tariff-based funding. Government grants can bridge this gap, ensuring that crucial transmission infrastructure is developed without placing an excessive financial burden on consumers. Additionally, state-funded support for such projects would facilitate balanced regional growth, promote industrialization in remote areas, and enhance overall energy security. A coordinated approach between OPTCL and the Government will help in prioritizing strategic projects, optimizing resource allocation, and accelerating execution timelines. Therefore, securing grants for these projects is imperative to ensure a robust and resilient transmission network that supports Odisha's long-term energy and economic goals.

26. The Commission may direct OPTCL to continuously monitor the transmission system's operation and take proactive measures to prevent overloading or under loading which is essential for ensuring an efficient and reliable power network. Overloading can lead to equipment failures, increased technical losses, and reduced system lifespan, while under loading results in inefficient asset utilization and financial strain. By adopting innovative strategies such as dynamic load management, network reconfiguration, real-time data analytics, and grid optimization techniques, OPTCL can achieve optimal loading of the existing infrastructure. This will not only help in reducing transmission losses but also enhance grid stability and improve overall system efficiency. Additionally, leveraging advanced technologies like AI-driven predictive maintenance, demand forecasting, and adaptive grid control will enable a more resilient and cost-effective transmission network. Therefore, continuous monitoring and proactive intervention are necessary to maximize the operational efficiency of the transmission system, ensuring sustainable and economical power transmission for all stakeholders.

27. The Commission's earlier directive for coordinated development of the intra-state transmission network, ISTS, and downstream distribution infrastructure is crucial to ensure optimal asset utilization, financial prudence, and grid stability. Many substations under OPTCL remain under loaded due to the absence of necessary downstream infrastructure from DISCOMs, leading to stranded assets and inefficient capital deployment. To avoid such inefficiencies, it is essential that OPTCL, DISCOMs,

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and CTU synchronize their planning and execution timelines. This will prevent unnecessary transmission investments that burden consumers with higher tariffs without delivering corresponding benefits. Moreover, ensuring that transmission system strengthening projects align with actual load growth will reduce the risk of power evacuation bottlenecks, voltage fluctuations, and increased transmission losses. A structured, joint planning approach will enhance grid reliability, improve network efficiency, and protect consumer interests. Therefore, the Commission's directive to mandate discussions among stakeholders before execution is a necessary step to ensure a well-integrated, cost-effective, and sustainable power transmission system.

28. Therefore, Transmission system upgrades should be strategically planned rather than implemented in an ad-hoc manner. The Commission should direct that no transmission system strengthening proposals should be executed without the prior approval of the Commission. Strengthening measures should be backed by technical and economic justifications, as required by OPTCL's license conditions and tariff regulations. Transmission projects involve significant capital investments that ultimately impact consumer tariffs. Prior Commission approval ensures that OPTCL implements only necessary and cost-efficient projects. Avoids excessive capital expenditure, which could lead to unjustified tariff hikes for consumers. Aligns investments with the approved capital expenditure (CAPEX) plans under the tariff regulations.

29. OPTCL should be directed to consider the meter data to assess the month-wise transmission loss in intra-state transmission systems including losses at different voltage levels (i.e. 132 kV, 220 kV and 400 kV levels).

30. The power utility has proactively implemented multiple loss reduction strategies, including system automation, load bifurcation, and digitization of the grid. Despite these extensive efforts, the anticipated loss reduction has not been realized, proving that systemic challenges persist beyond mere technical upgrades. Load bifurcation improves local reliability, but its impact on overall transmission loss is minimal, as power still needs to travel long distances from generation to consumption points. The introduction of ring systems instead of radial networks has increased network stability and redundancy, but transmission losses are still governed by physical distance and resistance of the conductors. Advanced transformers and low-loss conductors have been introduced, yet their impact on overall losses will be realized only after complete replacement of old equipment across the entire network. Bay control units (BCUs) and digital substations provide enhanced monitoring and real-time control over power flow, reducing inefficiencies. However, these tools primarily assist in identifying losses rather than eliminating them outright. Their full impact will be seen once corrective actions are consistently implemented over a longer duration.

31. It is proposed that Cyclone resilient robust electricity transmission and distribution infrastructure in coastal areas should be established by OPTCL. OPTCL may be directed to submit a report on how many mobile substations are available with them to meet the contingency situation during cyclone and their cyclone mitigation plan

GOVT. OF ODISHA H.M. Jena Notary Regd. No. 1393 BHUBANESWAR

which has been earlier directed by Hon'ble OERC. OPTCL has not taken action for the design of multi-circuit and multi voltage transmission lines.

32. We request the Hon'ble Commission to kindly allow the Respondent to submit any additional submissions, memos, documents etc. as may be required and in general do all such things as may be required in connection with the above reply.

PRAYER

In the facts and circumstances stated above and in the interest of the parties and the larger interest of the State the Hon'ble Commission be pleased to pass appropriate orders to the effect that

1. ARR of OPTCL may be approved accordingly based on the submission made above.
2. The Transmission Charges should be reviewed and reduced substantially.
3. Transmission loss to be reduced considering the submission made for FY 2026-27.
4. Proposal of Reactive energy charges of 3 paise/KVARh should be rejected.
5. Proposal of OPTCL to levy of Grid Support Charge for connectivity may be rejected.
6. Each year truing up exercise and business plan approval should be carried out by Hon'ble commission through a process of public hearing.

Place: Bhubaneswar **For The Utkal Chamber of Commerce & Industry Ltd.**

Date: 15.01.2026

Chairman – Expert Committee For Electricity & Power

GOVT. OF ODISHA H.M. Jena Notary Regd. No. 1393 BHUBANESWAR

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur
Bhubaneswar-751021

Case No: 121/2026
Filing No: 1

IN THE MATTER OF:

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND

IN THE MATTER OF:

Senior General Manager (Regulation, Tariff & Commercial), Odisha Power Transmission Corporation Limited, Janpath, and Bhubaneswar-751022.

... Applicant

AND

IN THE MATTER OF:

The Utkal Chamber of Commerce & Industry Ltd. (UCCI), N-6, IRC Village, Nayapalli, Bhubaneswar–751015, Email: pwrtch@gmail.com, contactus@utkalchamber.in, Phone-9437155337

...Respondent

Affidavit verifying the application

I, Shri Bibhu Charan Swain, son of Shri Baishnab Charan Swain, aged about 48 years, resident of Bhubaneswar, do solemnly affirm and state as follows: -

1. That I am the Chairman Electricity and Power Expert Committee, Utkal Chamber of Commerce & Industry, the Respondent in the above Petition and am fully authorized by the said Respondnet to make this Affidavit on its behalf.
2. That the statements made herein are to the best of my knowledge and information available and I believe them to be true.

PLACE: Bhubaneswar
DATE: 16.01.2026

The above named deponent being identified by ..... Advocate Bhubaneswar appears before me ..... at 10 Am/Pm states the Contents in this are true to the best of his/her knowledge

DEPONENT

HARA MOHAN JENA
NOTARY PUBLIC
Govt. of Orissa Regd.-13/95
L/B-54, Dhirna Tangi
Bhubaneswar-751002
Ph.: 2592479,9937427282

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
Plot No.4, Chunokoli, Shailashree Vihar, Chandrasekharpur
Bhubaneswar-751021
TEL. No. 2721048, 2721049, FAX: 2721053/2721057
E-mail: orierc@gmail.com, Website: www.orierc.org

Case No- 121, 122, 124, 126, 127, 128, 130, 131, 132, 134, 135, 136, 137, 138/2025

In the matter of: An application for approval of Aggregate Revenue Requirement, Retail Supply Tariff and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND

In the matter of: Determination of Open Access Charges for FY 2026-27 for consumers availing Open Access under Section 42 of the Electricity Act, 2003

AND

In the matter of: Determination of Wheeling Charges, Wheeling Losses, Cross Subsidy Surcharge for FY 2026-27 for LT Consumers taking power on Open Access permitted under OERC (Promotion of Renewable Energy through Green Energy Open Access) Regulations 2023 and other related matters

AND

In the matter of: Application for approval of Aggregate Revenue Requirement (ARR) and determination of Bulk Supply Price (BSP) for the Financial Year 2026-27 under Section 86 (1) (a) & (b) and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, and other related Rules and Regulations.

AND

In the matter of: Response filed by The Utkal Chamber of Commerce & Industry Ltd. (UCCIL), N-6, IRC Village, Nayapalli, Bhubaneswar – 751015 on behalf of its members.

Letter of Authorization

I, Sri (Dr.) Prabodh Mohanty, President of The Utkal Chamber of Commerce & Industry Ltd. (UCCIL), N-6, IRC Village, Nayapalli, Bhubaneswar – 751015 do hereby Authorize Mr. Bibhu Charan Swain, Chairman of Electricity and Power Committee, Executive Member of UCCI (whose details are furnished below) legally competent to represent our organization and to sign the representation and present oral submission before the Hon'ble Odisha Electricity Regulatory Commission and to submit any additional documents as may be required and in general do all such thing as may be required in connection with the above mentioned matter.

Details information of the authorized representative

Name	:	Mr. Bibhu Charan Swain
Full & details address	:	The Utkal Chamber of Commerce & Industry Ltd., N/6, IRC Village Nayapalli, Bhubaneswar-751015
Address of Auth Rep.	:	At-K-8-82, Kalinga Nagar, Ghatikia, Bhubaneswar-751029
Mobile	:	9437155337
Email	:	contactus@utkalchamber.in, pwrtch@gmail.com
Signature	:	

Details information and signature of the authorized representative is hereby attested.

For The Utkal Chamber of Commerce and Industry Ltd.

Place: Bhubaneswar
Date:

President

Accepted

(Bibhu Charan Swain)

B - 12

DTDC

DTDC Express Limited
Regd.Office: No-3,Victoria Road
Bengaluru - 560047

ORIGIN	BBSR	DEST.	BBSR
POUCH NO.		DATE	16.01.26

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Non Negotiable Consignment Note / Subject to Bengaluru Jurisdiction.

The consignment note is not a tax invoice. A tax invoice will be made available by DTDC or it's channel partner as the case may be, upon request.

1 Sender's (Consignor) Name: THE UTKAL CHAMBER OF COMMERCE Ph.:

Company Name & Address: 7735196035
H/6, IRC VILLAGE

City: BBSR State: PIN Code: 751015

Sender's GSTIN*:

*Where Applicable

2 Recipient's (Consignee) Name: THE SENIOR GENERAL MANAGER Ph.:

Company Name & Address: ODISHA POWER TRANSMISSION CORPORATION

City: BBSR State: PIN Code: 751022

Recipient's GSTIN*:

*Where Applicable

3 Nature of consignment (✓) Dox ☑ Non-Dox ☐ | Total Num Pcs:

DIM 1: L.....cm X B.....cm X H.....cm X.....Pcs | Actual Wt.: 0.1 kg
DIM 2: L.....cm X B.....cm X H.....cm X.....Pcs | Volumetric Wt.: kg
DIM 3: L.....cm X B.....cm X H.....cm X.....Pcs | Chargeable Wt.: kg

4 Description of Content: DOC | Total Value of consignment for carriage / E-Way bill: ₹

5 Paper Work Enclosures

6 Type of consignment (✓) Commercial ☐ Non Commercial ☐

7 Value Added Services: Not Available | CN Expiry Date

8 Mode (✓) Surface ☐ Air Cargo ☐ Express ☐

Consignment Number: K90091955

10 I/We declare that this consignment does not contain personal mail, cash, jewellery, contraband, illegal drugs, any prohibited items and commodities which can cause safety hazards while transporting

Sender's Signature & Seal

Date: Time: AM/PM

I have read and understood terms & conditions printed overleaf of this consignment note and I agree to the same.

9 Charges	Amount(₹)
a) Tariff (incl. Of FSC + Taxes)	
b) Risk Surcharge	
c) Total amount (a+b)	801/-

Above charges are inclusive of GST & other taxes if applicable

Mode of Payment: Cash ☐ Card ☐ Wallet ☐

11 Booking Branch / Franchisee Code

Courier Signature

12 Risk Surcharge: Owner ☐ Carrier ☐

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BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
PLOT NO. 4, SAILESHREE VIHAR,
CHANDRASEKHARPUR, BHUBANESWAR-751021

CASE NO. 121/2025
FILING NO. 3

IN THE MATTER OF: (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

And

(ii) Truing up application for the FY 2024-25 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

AND
IN THE MATTER OF: Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

.....

Applicant

vrs

Utkal Chamber of Commerce & Industry Ltd. (UCCI), N-6, IRC Village, Nayapalli, Bhubaneswar-751015 and **16 others.**

.....

Objectors

Rejoinder to the objections raised by the Objector Utkal Chamber of Commerce & Industry Ltd.

The humble applicant above named

MOST RESPECTFULLY SHEWETH:

1. That, the Objector Utkal Chamber of Commerce & Industry Ltd. (UCCI) vide affidavit dated 16.01.2026 has raised certain submissions on ARR & Transmission Tariff Application of OPTCL for FY 2026-27 and Truing up application for FY 2024-25. In reply, OPTCL submits its rejoinder to the submissions in the following paragraphs.

Rejoinder to Para 3 to 5:

The respondent has submitted statistical data of the previous years comparing the proposed vis-à-vis approved in respect of expenses towards human resource expenses, R&M expenses, A&G expenses, depreciation and RoE with a request to approve accordingly after due scrutiny. In this regard, it is pertinent to mention that OPTCL has submitted its ARR application for FY 2026-27 as per the various provisions stipulated in OERC (Terms & Conditions for Determination of Transmission Tariff) Regulations, 2014 and directions of the Commission passed in different orders with proper justifications.

Further, details of Sanctioned strength vis-a-vis actual man in position is furnished below:

Manpower position as on 20.01.2026			
Category	**Sanctioned Strength**	**MIP**	**%**
Executive	2040	1400	68.63%
Non-Executive	3862	1342	34.75%
Total	**5902**	**2742**	**46.46%**

Rejoinder to Para 6:

Determination of Transmission Charges:

The Transmission infrastructures are created considering the demand and request of the DISCOMs / Industries from time to time, after due approval form the Hon'ble OERC through Transmission Plan. Being a Deemed Transmission License, OPTCL has always endeavored to create the Transmission infrastructure for providing reliable and quality power to the consumers of DISCOMs. Accordingly, every year OPTCL is adding more transmission assets to meet the requirement of DISCOMs. Transmission Charge is arrived at 35.61 paise per unit by dividing the total ARR of OPTCL with the recent realistic MU projections of DISCOMs and recovered from them on a monthly basis. This rate will decrease if DISCOMs drawal increases. In fact, OPTCL has consistently advocated for the recovery of transmission charges based on contracted capacity, in line with the practice followed by STUs in other states.

The proposed Transmission Charge of 35.61 p/u has been derived by considering the recent realistic energy demand projections of 41,849.28 MU as communicated by the DISCOMs & other LTOA customers and the ARR figures have been arrived by OPTCL justifying component wise projections as per the provisions contained in OERC Transmission Tariff Regulations, 2014, OPTCL's Audited Accounts for FY 2024-25, all relevant data/information and materials. The details of projections are submitted in page 30 of the present ARR application of OPTCL for FY 2026-27. Moreover, OPTCL had furnished all requisite information and details as per the prescribed formats of the Hon'ble Commission with full justifications.

Hence, mere apprehension of the respondent towards imposition of excessive burden on Discoms seems to be inappropriate and unacceptable which is likely to be rejected at this juncture. Moreover, the contention of the stake holder operating in the value chain of electricity needs to appreciate the fact that the cost recovery has to be in full so as to make the sector sustainable.

Rejoinder to Para 7 & 8:

The Hon'ble Commission vide letter no. DIR (T)-332/2008/77 dated 01.02.2021 has clarified that the DISCOMs do not come under the new regulation "OERC (Terms and conditions of Intra state open access) Regulations 2020" and they are governed under OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014. A copy of the said letter is provided as **Annexure-01.** Further, the details of provision of Rebate have been meticulously mentioned in page no: 59 of our ARR application for FY 2026-27 as per the said OERC Regulations.

Rejoinder to Para 9-11:

Transmission Loss

The argument for transmission loss of OPTCL at 2.5% is without any justification. The actual transmission loss for the period **Apr' - Sep' 2025** is calculated to be **3.07%** as shown in the ARR & TT application for FY 2026-27 (page-205). This figure is **less than the actual** transmission loss during last year **i.e. 3.09%** for **FY 2024-25.** In fact, OPTCL had projected a Transmission loss of 3.05% for FY 2025-26, but Hon'ble Commission had set a target of 3.00% which could not be achieved yet.

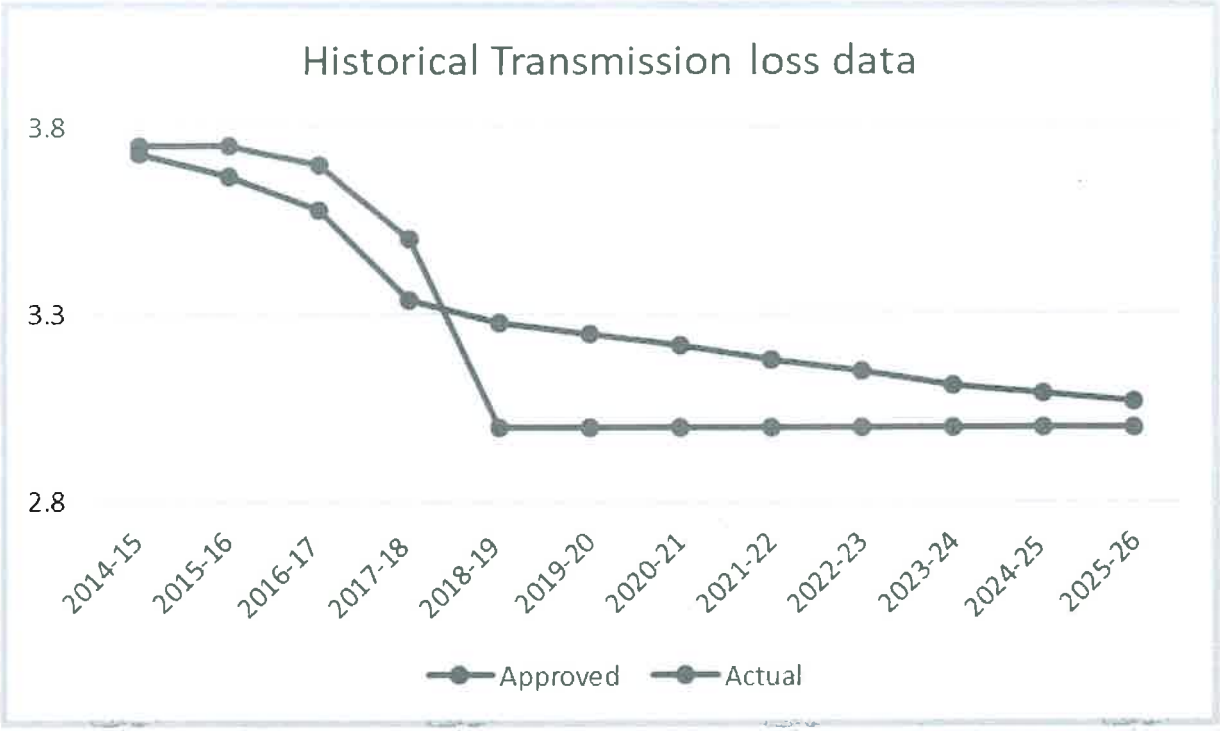
In OPTCL system, the transmission loss is purely technical loss and a function of real time injection of power by a number of generators, system configuration and power flow requirements at different load centers. It depends on many parameters / factors such as distance and mismatch between generation and load centers, types of

load, reactive power compensation, voltage profile, seasonal variation of demand load etc. Thus, OPTCL does not have much control over the same at any point of time. The transmission system of OPTCL operates as an integral part of the Eastern Region Grid to serve the internal demand of the State as well as to carry out import and export of power depending upon the system demand.

As a matter of fact, some grid s/s and lines are being constructed in many remote and deprived areas funded under Central & State Govt. schemes in the interest of public. Additional length in EHT lines and Sub-stations in under-loaded areas are also responsible for increase in transmission loss.

Transmission Loss in OPTCL network is in a gradually reducing trend over the years i.e. from 3.73% during 2014-15 to 3.09% in 2024-25 and has remained 3.07% within 1st six months of FY 2025-26 mainly due to addition of infrastructure and various system strengthening works taken up by OPTCL. The actual losses incurred over the years by OPTCL have been within the margin allowed by Hon'ble Commission up to the year FY 2017-18. However in FY 2018-19, the commission set the loss at 3.00% though the projected transmission loss was at 3.25% and thereafter the commission has been pegging the transmission loss at the same level though loss projected by OPTCL remained in a downward trend.

Year	Tr. Loss proposed	OERC Approval	Actual
2014-15	3.75%	3.75%	3.73%
2015-16	3.75%	3.75%	3.67%
2016-17	3.70%	3.70%	3.58%
2017-18	3.50%	3.50%	3.34%
2018-19	3.25%	3.00%	3.28%
2019-20	3.25%	3.00%	3.25%
2020-21	3.20 %	3.00%	3.22%
2021-22	3.15%	3.00%	3.18%
2022-23	3.10%	3.00%	3.15%
2023-24	3.10%	3.00%	3.11%
2024-25	3.05%	3.00%	3.09%
2025-26	3.05%	3.00%	3.07% (1st six months)



From the table given above, it is also clear that each year upto FY 2017-18, the transmission loss achieved by OPTCL has remained at a level lower than the approved figures by Hon'ble commission and from FY 2018-19 the target set by Hon'ble OERC appears to be very stiff which was hard to achieve though the trend of lesser transmission loss year after year has been achieved.

It may kindly be appreciated that transmission (technical) losses are inevitable in power systems due to the fundamental laws of physics and become increasingly difficult to reduce beyond a certain threshold. Further, at the all-India level, transmission losses across different regions have consistently remained above 3.12%. To substantiate our viewpoint, the transmission loss data for various regions is presented below for the kind consideration of the Hon'ble Commission.

Transmission loss of Different Regions for FY 2023-24

Region	Transmission loss
Northern Region	3.15%
Western Region	3.12%
Southern Region	3.46%
Eastern Region	**4.24% (Odisha- 3.11%)**
North Eastern Region	3.89%

(Courtesy: General Review 2025, Government of India, Ministry of Power, CEA attached as **Annexure-02**)

It may be observed that OPTCL's transmission loss of 3.07% is lower than the average transmission losses of all regions.

However, as a responsible Transmission utility, OPTCL is making an all-out effort to reduce the transmission loss further by undertaking various **system operation and loss reduction measures** by implementing the emerging technologies like **system Automation**, load bifurcation, **modification in system configuration**, procurement of more efficient equipment, **Digitalization of grids** by using SAS, Protection system improvement using Busbar protection and Event Logger, Advanced Metering Infrastructure, **Conversion of Radial to Ring system,** construction of GSS at **higher voltage levels** (220kV & 400kV), Replacement of old conductors and Transformers etc. to bring it to **3.05% by FY 2026-27.**

Steps taken for Energy Audit

Under the PSDF funding, SLDC is implementing the SAMAST project. After operational of SAMAST project, detailed energy auditing is possible.

Regarding inadvertent power

CGPs are not firm sources of power as they are essentially meant for the captive consumption. OPTCL does not agree to the assumption of the respondent that around 985MU of inadvertent power will be injected into the OPTCL system in a year considering the CGP capacity 9850MW. From the Pool Cost data provided by GRIDCO for the first six months of FY 2025-26, it is observed that the total inadvertent power injection is 230.643MU which has been already considered while calculating the Transmission loss of 3.07% in form T-6. Hence, Transmission loss as suggested by the Objector is not just and proper. Details of inadvertent power injected by CGPs in FY 2025-26 till September is furnished as under:

Month	**Quantum of inadvertent power (MU)**
April-25	38.31
May-25	38.79
Jun-25	39.97
Jul-25	30.39
Aug-25	43.27
Sep-25	39.92
Total	**230.64**

Further, it is submitted that Transmission charge is being computed on Open access transactions based on scheduled energy. Hence, OPTCL does not reap any benefit out of inadvertent power.

Rejoinder to Para 12:

Open Access Charges:

The system peak demand of **7069.89 MW** was touched on 12.08.2025 at 24:00 Hr. Statement on the loading pattern of the existing transmission system (400kV, 220kV & 132kV EHT lines along with loading on ICT, Auto & power transformers) corresponding to the peak demand is submitted in compliance to the OERC queries on ARR application of OPTCL for FY 2026-27 which will submitted to your good self along with this reply. OPTCL has already conducted load flow study considering different load scenarios i.e. Summer peak, Winter lean, High hydro, Low Hydro & Solar Peak in the Revised 14th Intra-state Transmission Plan of Odisha for FY 2022-23 to FY 2026-27, which has been duly approved by Hon'ble Commission vide case no. 08/2024. In the said report, percentage loading of all Transmission lines, ICTs, Auto & Power Transformers till FY 2026-27 have been mentioned. The Transmission infrastructures are being created considering the demand and requests of the DISCOMs/Industries from time to time after due approval form the Hon'ble OERC through Transmission Plan. DISCOMs and other LTA customers are responsible to bear the full approved ARR of OPTCL. STOA charge is being charged as per the Open Access Regulations, 2020.

Further, the revenue earned from STOA transactions is accounted for under Miscellaneous Income and is ultimately deducted from the Gross ARR to arrive at the net recoverable transmission charges to be recovered from consumers, including DISCOMs. Therefore, application of the 1/4th concept would result in an additional burden on domestic consumers. Further, as CERC regulations, the STOA rate is comparatively higher than LTA.

It is pertinent to mention that LTA consumers enjoy the first right and greater benefits compared to MTOA and STOA consumers. Therefore, for industries seeking a reliable, quality, and uninterrupted power supply, availing Long-Term Access (LTA) remains one of the most suitable options.



Rejoinder to Para 13:

Reactive Energy Charges:

As per Regulation 31(1) under Chapter-7 (IMBALANCE AND REACTIVE ENERGY CHARGES) of the OERC (Terms and Conditions of Intra-State Open Access) Regulations, 2020, payment for the reactive energy charges by open access consumers shall be in accordance with provisions stipulated in the State Grid Code or as may be specified in relevant regulations/orders of the Hon'ble Commission .

The Hon'ble Commission in Para 16 (page 5) of the order dated 05.02.2019 in Case No. 50/2017 has inter alia viewed that the provisional reactive energy charges of 3 paise/KVArH as allowed in the ARR order of OPTCL for FY 2018-19 continue for time being till a final justification is submitted by OPTCL in consultation with the stakeholders. However, despite raising reactive energy bills by SLDC since the beginning of FY 2025–26, no amount has been received in the Reactive pool account against Reactive Energy Charges to date due to non-payment by DISCOMs and other LTOA customers.

In view of the above, OPTCL proposes that 3paise/KVARh may be approved provisionally as Reactive Energy Charges for FY 2026-27.

Hence, the proposal of the objector to reduce the reactive energy charges as suggested by OPTCL is not just and proper.

Rejoinder to Para 14 & 15:

Levy of Grid Support Charge for connectivity:

The benefits derived by the CGPs with co-located loads are enormous. The benefits are in the nature of ancillary services which are not paid till now. The Grid support charges (GSC)/Parallel operation charge has been levied by different state Regulatory Commissions and upheld by APTEL and Supreme Court of India through various orders and hence proposed by OPTCL through a separate petition. OPTCL had filed an application (case No. 44 of 2024) on 26.06.2024 for determination and approval for levy of Grid Support Charges for industries having Captive Generating / Cogeneration plants and running in parallel with the Grids of OPTCL. Hon'ble Commission vide its order in case no. 44/2024 directed OPTCL to submit a consolidated report considering the observations/queries raised by the stakeholders in the earlier Cases filed by OPTCL. In compliance to above, OPTCL has filed the requisite report before Hon'ble Commission on 29.01.2025.

Further, it is submitted that a consumer connected to OPTCL network, pays demand charges for the contracted demand to concerned DISCOMs[. The rationale

behind this arrangement is that the corresponding quantum of transmission corridor capacity is reserved for the respective consumer, and only the remaining available capacity in the EHT network is allocated to other consumers. Moreover, it is observed that installed capacity of CGPs are much more than the contracted demand with DISCOMs.

However, it is observed that after synchronization with the grid, CGPs adversely impact grid quality through the injection of harmonics and other disturbances. To address such impacts and ensure grid stability, appropriate charges, namely Grid Support Charges, are required to be levied.

Further, it is submitted that OPTCL has proposed grid support charge factoring the contracted demand signed with DISCOMs by CGPs. So, double charging issue raised by the objector does not arise.

Rejoinder to Para 16:

Necessary system studies are invariably conducted and approvals are granted to RE developers applying for power injection or drawal following the completion of technical and field feasibility assessments.

Further, IT wing of OPTCL has developed a web portal i.e. ***Odisha Grid Insights*** **(OGrI)** portal to publish the key information related to OPTCL EHT Network. This portal will be updated on a monthly basis and will include the following details:

1. Geo-coordinates of all line assets under OPTCL.
2. Present loading data (Minimum & Maximum).
3. Projected load demand within the next 6 months.
4. Transformation capacity.
5. Network status, which will include:
    a. Spare feeders (equipped or not-equipped)
    b. Space available for feeder bays
    c. Possible take-off arrangements (by cable or by overhead)
    d. Evacuation facilities (radial mode or interconnected mode)
    e. Load category (percentage of industrial load vs. domestic load)

The portal is currently operational with most of the above information. The portal can be accessed at the following URL: **https://ogri.optcl.co.in**. This initiative will help RE developers to access the OPTCL network for finding potential injection points.

Rejoinder to Para 17:

Status of key Transmission projects is furnished below:
Project under ISTS

1. **765kV Angul – Gopalpur**
   a. Scheduled date of completion – December 2027.
   b. CERC yet to issue Transmission license to the L1 bidder under TBCB.
2. **765kV Angul – Paradeep**
   a. Scheduled date of completion – November 2026.
   b. CERC yet to issue Transmission license to the L1 bidder under TBCB.

Projects under OPTCL

1. **765kV Kolabira**
   - Approved under 21st CMETS-ER dated 22.08.2023
   - Land identification is in progress
2. **400kV Joda/Barbil (Basudevpur)**
   - Approved under 33rd CMETS-ER dated 05.08.2024
   - Land identification is in progress
   - Project will be executed by OPTCL upon finalisation of funding from Govt. and IP approval from Hon'ble Commission.
3. **400kV Ersama**
   - Scheduled date of completion – June 2026
4. **400kV Neulapoi**
   - Approved under 30th CMETS-ER dated 14.05.2024
   - Tender floated, work started

There is no provision of Capacity charges in the extant OERC Transmission Tariff Regulations, 2014. Since Gridco is procuring power through ISTS network, the transmission charges thereof is dealt by Gridco.

Rejoinder to Para 18:

It is intimated that the Business Plan of OPTCL for the 3rd Control Period, i.e., from FY 2024–25 to FY 2026–27, has been approved by the Hon'ble Commission vide Order dated 24.09.2025 in Case No. 20 of 2025.

Rejoinder to Para 19:

The Revised 14th Intra-State Transmission Plan of Odisha for FY 2022–23 to FY 2026–27 has been approved by the Hon'ble Commission vide Case No. 08/2024. Recently, the investment proposals for 37 projects were heard after inviting suggestions and objections from the general public.

Rejoinder to Para 20:

Initially construction of 400/220kV AIS S/S at Remuli along with associated lines was planned for TBCB . Subsequently, State Government after careful consideration have been decided to construct 400/220kV AIS S/S Remuli(at Basudevpur) and establishment of 2x160 MVA, 220kV GIS S/S at existing Barbil GSS along with associated 400kV & 220kV lines on cost plus method instead of TBCB mode. Accordingly, at present, there is no proposal for execution of any project under TBCB mode.

OPTCL has standardized technical specifications for transmission line towers/steel poles, power transformers, switchgear, surge arresters, CTs, PTs/CVTs, conductors, insulators, fire fighting systems, lighting systems, AC/DC systems, etc., and continues to incorporate improvements as identified for further refinement

Rejoinder to Para 21:

OPTCL maintains an in-house oil testing laboratory that serves as the central facility for analyzing oil breakdown voltage, dissolved gas analysis and PPM measurements. A relay testing laboratory is also planned. OPTCL will approach the Government of Odisha for funding to obtain National Accreditation Board for Testing and Calibration Laboratories (NABL) accreditation for both laboratories.

Rejoinder to Para 22:

No GCC meeting has been conducted in FY 2023-24 and 01 no. GCC meeting has been conducted in FY 2024-25. The details of recent GCC meeting conducted is furnished below:

GCC meeting	Date of meeting
17th GCC meeting	17.01.2025
18th GCC meeting	03.09.2025

OPTCL has already sought agenda items from various stakeholders for the 19th GCC meeting. Further, upon finalization of the agenda, the GCC meeting will be convened shortly. The amount proposed under GCC head will be utilised fully.

Rejoinder to Para 23:

OPTCL will take up the proposal of converting Switching Station to Substation based on the demand projection of DISCOMs and the proposal received by RE developers on a case to case basis with the approvals of Hon'ble Commission.

Rejoinder to Para 24:

The respondent's suggestion has been noted and OPTCL will include the details of loading pattern in the ARR filing of the coming years. Invariably, OPTCL has been sharing the details of loading pattern of all the ICTs, Auto & Power transformers in L-9 format (OERC approved format) as a part of ARR filing every year. Further, loading details corresponding to the maximum demand of **7069.89 MW** on 12.08.2025 has been provided in Compliance to the OERC queries on ARR application of OPTCL in case no. 121/2025.

Rejoinder to Para 25:

Since the creation of transmission infrastructure requires huge investments, OPTCL always requests the state Government for financial support. State Govt. has been contributing 100% financial assistance in the shape of grant/equity in case of non-remunerative and contributing 30% equity support in case of remunerative projects.

Rejoinder to Para 26:

To prevent overloading, regular system study has been carried out and augmented the network capacity as and when required. Priority has been given to use the under loaded network. As directed by Hon'ble Commission, regular meetings are being conducted with DISCOMs for creation and timely completion of downstream infrastructure for optimum utilization of transmission networks. New Transmission elements proposed by OPTCL to strengthen state evacuation are deliberated and approved in the CMETS-ER meeting, held on monthly basis which are further incorporated in National Transmission Network. At present, OPTCL is implementing the STAMS project, under which all network parameters will be monitored centrally. This will enable system operators to take prompt corrective actions, thereby enhancing grid stability and improving overall system efficiency. Further, OPTCL has planned for AI based inspection & maintenance of the Transmission lines and also planning for Asset Performance Management System with AI capabilities for predictive maintenance of its transmission assets.

Make Order Basis

Rejoinder to Para 27:

As per the provisions of Sections 39 and 40 of the Electricity Act, 2003, OPTCL, being the State Transmission Utility (STU), is responsible for the planning and development of the transmission infrastructure in the State of Odisha. OPTCL obtains inputs from DISCOMs, industries, and generators, and thereafter prepares a comprehensive Intra-State Transmission Plan considering various loading conditions. All new transmission proposals are duly approved by the Hon'ble Commission through the Transmission Planning, Business Plan, and Investment Proposal approval process, wherein DISCOMs and the State Government are among the respondents.

Further, consultations are held with stakeholders through Transmission and Distribution Coordination Committee (TDCC) meetings, Grid Coordination Committee (GCC) meetings, and meetings at the Government level to ensure the optimal utilization of OPTCL's transmission system.

Rejoinder to Para 28:

OPTCL always executes its projects which are either approved in Business Plan of OPTCL or Intra State Transmission Plan. As per the license conditions, OPTCL is mandated to take prior approval of Hon'ble Commission for any transmission projects above Rs. 10 Cr. which OPTCL has been following scrupulously.

Rejoinder to Para 29:

Transmission loss in OPTCL is computed based on the Pool Cost data received from GRIDCO and the Energy Flow Statement issued by SLDC, both of which are prepared using data recorded by energy meters.

Rejoinder to Para 30:

Some of the innovative technologies adopted in OPTCL as under:

- OPTCL has successfully implemented digital substation technology at the 132/33 kV Agalpur–Rampur GSS, wherein fiber optic cables are used in place of conventional copper control cables to transmit current, voltage and control signals digitally. In this system, loss-causing copper elements are eliminated and replaced with fiber optics. Such incremental technological improvements collectively contribute to the reduction of transmission losses.

- Further, OPTCL is continuously replacing existing conductors in transmission lines, where thermal loading is approaching limits, with High

Temperature Low Sag (HTLS) conductors, which have lower resistance compared to conventional ACSR conductors.

- On an experimental basis, OPTCL has installed a Fiber Optic Current Transformer (FOCT) at Chandaka GSS, thereby eliminating the need for conventional current transformers.

- Furthermore, OPTCL is augmenting age-old transformers with new, energy-efficient transformers, replacing old conductors with new ones, converting radial lines into ring mains, and upgrading single-circuit (S/C) lines to double-circuit (D/C) lines. All these measures collectively result in an overall reduction in transmission losses.

Rejoinder to Para 31:

The following outlines OPTCL's step-by-step Cyclone Mitigation Plan for Odisha's transmission & distribution network. It addresses Commission directives on adequate spares, Emergency Restoration System (ERS), mobile substations, and faster restoration following cyclones.

STEP-BY-STEP CYCLONE MITIGATION PLAN

Governance & Activation:

a) Overall command during a cyclone emergency rests with the Incident Commander, normally the CMD or Managing Director of OPTCL. Sr. General Manager of each zone control field operations, while the State Load Despatch Centre provides real-time grid coordination.

b) This command structure is activated the moment the India Meteorological Department (IMD) issues a cyclone watch or warning. A watch triggers a pre-impact alert; a warning of landfall within forty-eight hours or confirmed multi-tower failures escalates the plan to full mobilisation.

c) State Government bulletins and ground observations supplement the IMD alerts.

Pre-season Preparedness:

a) Every year between January and March, before the cyclone season begins, OPTCL updates a detailed coastal risk map covering a sixty-kilometre buffer from the shoreline. Priority circuits and substations are listed in the Power Atlas and circulated internally.

b) All two strategic depots—Mancheswar and Chatrapur—are audited to verify the availability of Emergency Restoration System (ERS) towers, spare transformers

of various MVA ratings, extra-high-tension conductors, insulators, diesel-generator sets and de-watering pumps. Inventory is replenished to maintain at least a 5% maintenance buffer.

c) During this period, right-of-way corridors are cleared and trees trimmed, short-span interpositions are inspected, and a full functional check is performed on SCADA, OPGW, VSAT and satellite-phone links. Round-the-clock control rooms are tested to ensure operational readiness.

Pre-impact Measures:

a) Once the IMD issues a watch or warning, the Incident Commander issues a formal mobilisation order. This specifies the ERS kits, cranes, truck-mounted 33 kV mobile substations, spare transformers and diesel generators required for each corridor, along with designated staging points.

b) Crews, equipment and at least one ERS kit per priority corridor are moved to pre-cleared rally points, with police and forest permits already in place. Rate-contract gangs are activated.

c) Where necessary, the grid is reconfigured or islanded in advance to reduce cascade risk and to preserve supply to critical facilities such as hospitals, water-supply systems and telecom nodes.

During the Cyclone:

1. Safety is paramount. Field work is suspended whenever sustained wind speeds exceed safe operating limits, and all on-site activity resumes only with clearance from the Safety Officer.
2. Control rooms remain staffed around the clock. SCADA and VSAT systems continue to provide live status updates, and hourly situation reports are transmitted to the State Load Despatch Centre.

Immediate Restoration (First 72 Hours):

I. Within six to twelve hours of landfall—once conditions allow—assessment teams use drones and ground patrols to identify and geo-tag damage. ERS towers are deployed rapidly to bypass collapsed structures and to re-establish ring feeds, giving priority to feeders that supply hospitals, water works and essential communications.

II. If ERS deployment alone cannot restore local grids, truck-mounted 33 kV mobile substations are sent to key district hubs within the sixty-kilometre coastal belt.

Diesel generators pre-installed at substations provide auxiliary power to support these operations and enable permanent repairs.

Medium-Term Recovery (Up to 14 Days):

10. Temporary ERS installations are replaced with permanent towers and foundations designed for Wind Zone VI conditions. Conductors are re-strung and insulators—preferably long-rod or silicone composite for saline environments—are repaired or replaced. Transformer and other high-tension equipment are inspected and restored.
11. Depots are immediately replenished and purchase orders raised to replace used ERS components, conductors and insulators. All regulatory incident reports and applications for State and National Disaster Response Funds are filed as required.

Long-Term Mitigation:

15. Beyond immediate restoration, OPTCL continues to strengthen the network. The DRPS Phase II programme accelerates underground cabling of the most vulnerable urban and coastal corridors and upgrades overhead lines with shorter spans and higher wind-rated towers.
16. A permanent fleet of 33 kV truck-mounted mobile substations will be procured and stationed at DRC hubs so that each coastal division has dedicated rapid-response capacity. An ERS Division—headquartered in Bhubaneswar is being institutionalized to maintain equipment, conduct training and manage mutual-aid agreements with neighbouring utilities and POWERGRID for cranes and heavy hardware.

Capacity Building and Oversight:

13. All ERS crews undergo annual table top and field drills, including full tower erection and mobile-substation commissioning. Weekly patrols, thermo-vision inspections and safety audits are mandated for coastal towers, and results are logged centrally.
14. Recently a five-day mock exercise on the erection of 400 kV ERS towers and stringing of ACSR Twin Moose Conductor was conducted near Bhubaneswar Baliyatra Ground. The program was designed as a refresher and capacity-building initiative, enabling OPTCL engineers to gain hands-on exposure to ERS tower components, erection procedures, and stringing

operations. This exercise not only helped in familiarization and skill enhancement but also strengthened the preparedness of field engineers to effectively respond during exigencies and restoration scenarios.

15. During any event, daily restoration reports are sent to the Odisha Electricity Regulatory Commission and the State Disaster Management Authority, followed by a formal after-action review within seven days.

Regarding design of Multi circuit tower

OPTCL has already standardized the design of multi-circuit towers. At present, such towers are being used in the 220 kV Pandiabil–Samangara transmission line. Further, in many upcoming projects, wherever required, multi-circuit towers are planned to be adopted.

2. The objections not specifically admitted may be deemed to have been denied.

PRAYER

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of Utkal Chamber of Commerce & Industry Ltd. while approving ARR and Transmission Tariff of OPTCL for FY 2025-26 & Truing up application for the FY 2023-24.

By the Applicant
Through

Sr. GM (El.), RT&C

Bhubaneswar
January 27, 2026

NOTARY OF ODISHA

Check Point Threat Extraction Secured This Document Get Original

Annexure-01

ODISHA ELECTRICITY REGULATORY COMMISSION
BIDYUT NIYAMAK BHAWAN
PLOT NO.4, CHUNOKOLI, SHAILASHREE VIHAR,
BHUBANESWAR - 751021
TEL. No. 2721048, 2721049, FAX: 2721053/2721057
E-mail: orierc@gmail.com
Website: www.orierc.org

****

No. DIR (T)-332/2008/ 177
Dt. 01.02.2021

To

The Managing Director,
OPTCL,
Janpath, Bhubaneswar-22.

Sub: Billing procedure consequent upon implementation of new Open Access Regulations, 2020.

Ref: Your letter No. RT&C-47/2020/18(3) dt.08.01.2021.

Sir,

In inviting a reference to the subject mentioned above, it is to intimate you that transmission tariff of OPTCL is governed under OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 which is still in force.

Regulation 6.5 of Transmission Tariff Regulation, 2014 states as follows:

*"**Transmission Tariff:** The Transmission Tariff payable by the Beneficiaries of the Transmission System shall be designed to recover the Aggregate Revenue Requirement approved by the Commission for each year of the Control Period."*

Regulation 2.1(h) of the same Regulation states that a distribution licensee shall necessarily be a long term transmission customer for which it shall be required to enter into a transmission service agreement with the transmission licensee.

Aggregate Revenue Requirement of the transmission licensee is recovered from the beneficiaries DISCOMs who are long term open access customers. The Commission carryout true up exercise under the same Regulation basing on the actual expenses booked in the audited books of the account of the transmission licensee for the year and expenses allowed in the ARR for the corresponding financial year. Therefore, the approved ARR of the transmission licensee is well taken care of for any short fall on this account. The STU has entered into transmission service agreement with the DISCOMs accordingly.

O/C

The Open Access Regulation, 2020 stipulates that the open access customer who wishes to avail open access under that Regulation shall have to apply for the same. DISCOMs do not come under the same and are governed under Transmission Tariff Regulation, 2014 and consequential special transmission service agreement. The long term customer other than the DISCOMs shall come under OERC Open Access Regulation, 2020.

Therefore, you are required to follow OERC Transmission Tariff Regulation, 2014 scrupulously as long as it is in force.

Yours faithfully,

SECRETARY 1.2.2021

Annexure-02

सत्यमेव जयते

अखिल भारतीय विद्युत सांख्यिकी

All India Electricity Statistics

सामान्य पुनर्विलोकन 2025

(2023-24 के आंकड़े समाविष्ट)

General Review 2025

(Containing Data for the Year 2023-24)

भारत सरकार
विद्युत मंत्रालय
केंद्रीय विद्युत प्राधिकरण
नई दिल्ली
नवंबर 2025

Government of India

Ministry of Power

Central Electricity Authority

New Delhi

November 2025

(अधिनियम 2003 की धारा 73 (आई) एवं (जे) के तहत के. वि. प्रा. के दायित्व के पालन हेतु प्रकाशित)

(Published in fulfilment of CEA's obligation under Section 73(i) & (j) of the Electricity Act 2003)

Table 6.2
Regional Transmission Losses
Utilities
2023-24

Region	Energy Available in the Region (GWh)	Export to other Region (GWh)	Export to Nepal (GWh)	Export to Bangladesh (GWh)	Export to Bhutan (GWh)	Export to Myanmar (GWh)	Total Energy drawal by States/Utilities (GWh)	Transmission Losses (GWh)	Transmission Losses (%)
1	2	3	4	5	6	7	8	9 (2-3-4-5-6-7)	10((8/2)x100)
Northern Region	234996.97	3117.23	170.57	0.00	0.00	0.00	224302.97	7406.20	3.15
Western Region	332120.58	99896.14	0.00	144.00	0.00	0.00	221708.25	10372.19	3.12
Southern Region	212787.85	4758.03	0.00	0.00	0.00	0.00	200663.51	7366.31	3.46
Eastern Region	142021.92	55318.56	1254.36	7315.07	1330.61	0.00	70787.65	6015.68	4.24
North Eastern Region	19710.81	3117.64	0.00	1072.11	0.00	8.47	14746.36	766.23	3.89

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transforming for good

CENTRAL DIARY No. 70 Dt. 17.01.26 OPTCL, HQ., BBSR

CHAIRMAN-CUM-MANAGING DIRECTOR No. 113 19 JAN 2026 OPTCL, BHUBANESWAR

Ref: VL/OPTCL/2026/Jan/01 Date: 16.01.2026

To,

The Chairman-cum-Managing Director,
OPTCL, Janpath,
Bhubaneswar, Odisha, 751007

Subject: Serving copy of comments/suggestions submitted by Vedanta Limited in ARR application (Petition No. 121 of 2025) of OPTCL for FY 2026-27.

Dear Sir,

With reference to the subject cited above, please find the enclosed copy of comments/suggestions submitted by Vedanta Limited before Hon'ble OERC.

Kindly acknowledge the receipt of the same.

Thanking you.

For Vedanta Limited, Jharsuguda

Authorised Signatory

VEDANTA LIMITED

Encl: Copy of comment/suggestions submitted by Vedanta Ltd before OERC.

RTBC 19/1

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Ref: VL/OERC/2026/Jan/02

Date: 16.01.2026

To,
The Secretary,
Odisha Electricity Regulatory Commission
Plot no. 4, Chunokoli, Sailashree Vihar,
Chandrasekharpur, Bhubaneswar-751021.

Ref: Petition No. 121/2025

Subject: Comments to the application of OPTCL for determination of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27.

Dear Sir,

With reference to the above cited subject & petition filed by OPTCL on the subject matter for approval of Aggregate Revenue Requirement and determination of Transmission Tariff for the Financial Year 2026-27, please find attached comments of Vedanta Limited, for your kind consideration.

We also would like to request you to allow us some time to explain our views in person on the date of hearing in the subject matter.

Kindly consider our request and allow us a suitable time slot during the hearing.

Thanking you.

For Vedanta Limited, Jharsuguda

Authorised Signatory

VEDANTA LIMITED

Cc: The CMD, OPTCL – For kind information

ODISHA ELECTRICITY REGULATORY COMMISSION RECEIVED

Vedanta Limited - Aluminium & Power: Vill- Bhurkamunda, P.O- Kalimandir, Dist- Jharsuguda (Odisha)- 768202
T +91-664 566 6000, F +91-664 566 6427, www.vedantalimited.com

Registered Office: Vedanta Limited 1st Floor, 'C' wing, Unit 103, Corporate Avenue, Atul Projects, Chakala, Andheri (East), Mumbai 400093, Maharashtra, India, CIN: L13209GA1965PLC000044

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION

Plot No.4, Chunokoli, Sailashree Vihar, Chandrasekharpur, Bhubaneswar

Case No: 121/ 2025

IN THE MATTER OF:

Application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64(2) and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC Regulation 53 (7) of the OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND IN THE MATTER OF:

OPTCL, Janpath,

Bhubaneswar, Odisha-751007 ..... **Applicant**

Vedanta Ltd.
1st Floor, Module-C/2,
Fortune Tower, Chandrasekharpur,
Bhubaneswar, Odisha-751023 ..... **Objector**

Comments/Inputs on Approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 to be applicable from 1st April 2026.

In reference to the above cited subject & petition no 121/2025 for approval of ARR and Transmission charges, we submit our comments as under:

1. The Objector, Vedanta Limited (**"Vedanta")** owns and operates the following plants:

a) 2400 MW (4 x 600 MW) thermal power plant at Jharsuguda, Odisha ("**Vedanta-TPP").**

b) 1215 MW (9 x 135 MW) captive power plant in Jharsuguda, Odisha ("**Vedanta-CPP**").

SUBMISSIONS OF THE OBJECTOR:

The Objector hereby makes the following submissions which may be taken into consideration by the Hon'ble Commission for the purpose of present proceedings.

Before delving into the merits of the petition, Vedanta limited would like to make the following request before Hon'ble Commission

1. It would be imperative to submit that vide Ministry of Power Notification S.O. 4421(E) dated 27th September 2025' all CGPs and Open Access consumers must mandatorily consume certain percentage of total energy consumption from renewable energy, and the source of renewable energy must be other than distribution licensee. The specified minimum share of electricity to be consumed from renewable sources mentioned below.

Year	Wind energy	Hydro energy	Distributed renewable energy*	Other renewable energy	Total renewable energy
(2)	(3)	(4)	(5)	(6)	(7)
2024-25	0.67%	0.38%	1.50%	27.36%	**29.91%**
2025-26	1.45%	1.22%	2.10%	28.24%	**33.01%**
2026-27	1.97%	1.34%	2.70%	29.94%	**35.95%**
2027-28	2.45%	1.42%	3.30%	31.64%	**38.81%**
2028-29	2.95%	1.42%	3.90%	33.09%	**41.36%**
2029-30	3.48%	1.33%	4.50%	34.02%	**43.33%**

It is evident from the above table that for the current financial year, CGPs and Open Access Consumers are obligated to fulfil its RCO to the tune of 33.01%, against the consumption of thermal power availed under Captive consumption and Open Access regime by the obligated entity. For FY 2026-27 the same increases to the tune of 35.95%.

It is submitted that Govt of India has set an ambitious target to install 500 GW of Renewable Power by FY 2030. National Tariff Policy 2016 under clause 6.4 "Renewable sources of energy generation including Co-generation from renewable energy sources:" provides various guidelines to promote procurement of Renewable energy.

As the demand of green Aluminium, green steel is continuously rising globally, and the introduction of **Carbon Border Adjust Mechanism** by European Union's wherein the European Nations places an emission tariff on imports. The CBAM will **initially apply to imports of certain goods and selected precursors** whose production is carbon intensive and at most significant risk of carbon leakage like cement**, iron and steel, aluminium, fertilisers, electricity**

and hydrogen. In its 1st phase exporters has to share its carbon emission data with the products exported in EU nations. It is imperative for core manufacturing industries producing Aluminium, Cement, Steel, Fertilizers to switch in RE power in gradual manner to be globally competitive. As per the latest study by Centre for energy, Environment and Water the CABM tax would impact 43% of India's export to the EU nations, India's second largest oversea market due to raising of cost and eroding competitiveness.

It is pertinent to mention here that State of Odisha is a manufacturing hub of India due to its vast reserves of mineral and industrial friendly policy made by Govt of Odisha. The state is the largest producer of iron and steel, stainless steel, primary Aluminium and thermal power in the country. These sectors are power intensive sector which need to be transitioned from thermal to green power in an economic viable manner to be globally competitive.

However, imposition of 100% of transmission charges on availing green power from outside of the state by the industries is making the cost of power highly uneconomic.

As the state have limited potential for solar and wind power which are commercial proven RE sources, it becomes vital for the industries to buy RE power from other states to comply RCO and use of green power to make greener product. In line with Odisha Renewable Energy Policy, dated 30.11.2022 Hon'ble Commission has already provided exemption on Intra State transmission charges, waiver on electricity duty, 50% waiver on CSS on the renewable power generated within the state. This is a welcome step which helps to promote level of renewable energy power mix within the state. However, we would like to bring your kind attention on the point that increasing contribution of clean energy ultimately helps in decarbonize the existing level of use of thermal sources within the state thus, increasing consumption of green power by industries is also very critical thereby providing certain waivers/exemption in CSS would ultimately motivate industries to increase RE power consumption.

In view of the above submissions, we humbly prayed before Hon'ble Commission to provide at least 50% waiver on transmission charges levied on the procurement of green power outside of the State under any Open Access arrangement.

2. **Determination of Transmission Charges:** It is submitted that OPTCL has proposed transmission charges @ 35.61 P/U for FY 2026-27 against 25.5 P/Unit

as approved by the Commission during FY 2025-26. It is humbly prayed before Hon'ble Commission to kindly consider the expenses proposed by OPTCL in its ARR after prudent check.

3. **Reactive Energy Charges:** OPTCL has proposed to introduce Reactive Energy Charges of 3 Paise/KVARh. There is no such provision in the Transmission Tariff Regulation and against the spirit of Electricity Act 2003 and hence the proposal of OPTCL is required to be straight away rejected.

   It is submitted that Commission provisionally approves reactive energy charges @ 3 paise/kVARh for the FY 2025-26 vide its order dated 24.03.2025 in Case No. 93 of 2024. However, despite approval of such charges for last five years subject to justification to be submitted by OPTCL, OPTCL has not yet submitted the required justification of reactive energy charges in consultation with the stakeholders. Therefore, OPTCL is requested to clarify whether the final justification regarding the reactive energy charges as proposed is submitted as per the Hon'ble Commission's order dated 05.02.2019 in case no. 50/2017. If the same has not yet been submitted by OPTCL then it is humbly prayed before commission to not allow the proposed reactive energy charges for FY 2026-27.

4. **Levy of Grid Support Charges (GSC):** OPTCL has filed an application (case No 44 of 2024) on 26.06.2024 for determination and approval for levy of Grid Support Charges for industries having Captive Generating / Cogeneration plants and running in parallel with the Grids of OPTCL. Hon'ble Commission in its order directed the OPTCL to submit a consolidated report within three months' time on or before 15.10.2024 considering the observations/ suggestions of the Director (Regulatory Affairs), OERC along with addressing observations/queries raised by the stakeholders in the earlier Cases filed by M/s. OPTCL regarding GSC.

   OPTCL has submitted aforesaid report on 29.01.2025. It is humbly prayed before Hon'ble Commission to direct OPTCL to share the report with affected parties before admission of application/petition at OERC and to conduct public hearing of the application/petition including affected parties as respondent to the application/petition

Place: Bhubaneswar

Date: 16.01.2026

VEDANTA LIMITED

Objector

BEFORE THE ODISHA ELELCTRICITY REGULATORY COMMISSION, BHUBANESWAR

CASE NO. 121 of 2025

IN THE MATTER OF:

An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64(2) and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

AND IN THE MATTER OF:

Odisha Power Transmission Corporation Ltd. (OPTCL)
Janpath, Bhubaneshwar
Odisha – 751007 **...Applicant**

Vedanta Limited
1st Floor, Module C/2, Fortune Towers,
Chandrasekharpur, Bhubaneswar, Odisha-751023
E Mail Id.: ninad.nigam@vedanta.co.in
Contact No: 9993000757 **...Objector**

AFFIDAVIT

I, Sri Ninad Nigam, S/o Shri P K Nigam aged about 42 years, resident of Bhubaneswar, do solemnly affirm and state as follows: -

1. That I am working as the Associate General Manager- Power Regulatory Affairs in Vedanta Limited, the objector in the matter and am fully authorised by the said Company to make this affidavit on its behalf.

14-01-2026

SAMARENDRA SAHOO
NOTARY, BHUBANESWAR
GOVT. OF ODISHA, INDIA
REGD NO:- 22/08
MOBILE: 9437277738

2. I have read the accompanying reply/comments, and I say that its contents are true to my knowledge and belief and based on records which are believed to be true and correct.
3. The annexures, if any, filed along with the reply/comments are true copies of their respective original.

Deponent

Place: Bhubaneswar

Date: 14.01.2026

VEDANTA LIMITED

VERIFICATION

I, the objector above named do hereby verify that the contents of the above affidavit are true and correct to the best of my knowledge, no part of it is false and nothing material has been concealed therefrom.

Verified at Bhubaneswar on this 14th day of January 2026.

Deponent

Place: Bhubaneswar

Date: 14.01.2026

VEDANTA LIMITED

14.01.2026

SAMARENDRA SAHOO
NOTARY, BHUBANESWAR
GOVT. OF ODISHA, INDIA
REGD NO:- 22/08
MOBILE: 9437277730

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION

PLOT NO. 4, SAILESHREE VIHAR,

CHANDRASEKHARPUR, BHUBANESWAR-751021

CASE NO. 121/2025
FILING NO. 3

IN THE MATTER OF: (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

And

(ii) Truing up application for the FY 2024-25 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

AND
IN THE MATTER OF: Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

..... Applicant



vrs

M/s. Vedanta Limited, 1st Floor, Module- C/2, Fortune Towers, Chandrasekharpur, Bhubaneswar, Odisha-751023 **& 16 Others.**

..... Objectors

Rejoinder to the objections raised by the Objector M/s. Vedanta Limited

The humble applicant above named

MOST RESPECTFULLY SHEWETH:

1. That the Objector M/s. Vedanta Limited(Sl No-11) vide affidavit dated 14.01.2026 has made certain submissions on ARR & Transmission Tariff Application of OPTCL for FY 2026-27 and Truing up application for FY 2024-25. In reply, OPTCL submits its rejoinder to the submissions in the following paragraphs.

Rejoinder to Para 1:

Waiver/exemption on STU charges for inter-state RE power procurement

In compliance to para 1, OPTCL submits the following:

- The very purpose of the Odisha Electricity Regulatory Policy (OERP), 2022 is to promote a robust, reliable, and sustainable power sector in the State by ensuring adequate infrastructure development, facilitating efficient generation, transmission, and distribution of electricity, encouraging renewable energy integration, attracting private and public investment, and safeguarding consumer interests through transparency, competition, and regulatory certainty.
- The Hon'ble Odisha Electricity Regulatory Commission (OERC), in its letter No. OERC/DIR(T)-332/08/480 dated 01/05/2024, has already facilitated the procurement of RE power from outside the state by applying transmission charges on scheduled basis, rather than on contracted capacity. This initiative has benefitted industrial consumers procuring RE power. A copy of the aforesaid letter is attached as **Annexure-01**.
- It is important to note that OPTCL is undertaking the construction of transmission projects with significant associated costs. Further waivers on transmission charges for industrial consumers could place an additional burden on retail consumers.
- Industries are already benefiting from the waiver of transmission charges for the procurement of renewable energy (RE) power through the CTU network, which places a financial burden on all Designated Interstate Customers (DICs), including GRIDCO in the state of Odisha. Waiver of 50% on transmission charges is an additional burden to the consumers of Odisha.
- Further, in the case of inter-state procurement, although the energy is accounted for on a mathematical/notional basis, there is no actual physical consumption of renewable energy within the State. Consequently, the benefit arising from reduction in carbon emissions is not availed by the people of Odisha.
- Most importantly, merely procuring renewable energy (RE) power from outside the State to meet Renewable Consumption Obligation (RCO) requirements does not align with the objectives of the State Renewable Energy Policy. Therefore, the respondent may consider developing RE

projects within the State to avail the transmission charge exemption of 20 paise per unit, as provided under the Renewable Energy Policy, 2022.

Therefore, considering the above factors, the request from Vedanta should not be approved by the Hon'ble Commission.

Rejoinder to Para 2:

Determination of Transmission Charges:

The Transmission infrastructures are created considering the demand and request of the DISCOMs from time to time, after due approval form the Hon'ble OERC through Transmission Plan. Being a Deemed Transmission License, OPTCL has always endeavored to create the Transmission infrastructure for providing reliable and quality power to the consumers of DISCOMs. Accordingly, every year OPTCL is adding more transmission assets to meet the requirement of DISCOMs. Transmission Charge is arrived at 35.61 paise per unit by dividing the total ARR of OPTCL with the recent realistic MU projections of DISCOMs and recovered from them on a monthly basis. This rate will decrease if DISCOMs drawal increases.

Rejoinder to Para 3:

Reactive Energy Charges

As per Regulation 31(1) under Chapter-7 (IMBALANCE AND REACTIVE ENERGY CHARGES) of the OERC (Terms and Conditions of Intra-State Open Access) Regulations, 2020, payment for the reactive energy charges by open access consumers shall be in accordance with provisions stipulated in the State Grid Code or as may be specified in relevant regulations/orders of the Hon'ble Commission.

The Hon'ble Commission in Para 16 (page 5) of the order dated 05.02.2019 in Case No. 50/2017 has inter alia viewed that the provisional reactive energy charges of 3 paise/KVArH as allowed in the ARR order of OPTCL for FY 2018-19 continue for time being till a final justification is submitted by OPTCL in consultation with the stakeholders. However, despite raising reactive energy bills by SLDC since the beginning of FY 2025–26, no amount has been received in Reactive pool account against Reactive Energy Charges to date due to non-payment by DISCOMs and other LTA customers.

In view of the above, OPTCL proposes that 3paise/KVARh may be approved provisionally as Reactive Energy Charges for FY 2026-27.

Rejoinder to Para 4:

Levy of Grid Support Charges

The benefits derived by the CGPs with co-located loads are enormous. The benefits are in the nature of ancillary services which are not paid till now. The Grid support charges (GSC)/Parallel operation charge has been levied by different state Regulatory Commissions and upheld by APTEL and Supreme Court of India through various orders and hence proposed by OPTCL through a separate petition. OPTCL had filed an application (case No. 44 of 2024) on 26.06.2024 for determination and approval for levy of Grid Support Charges for industries having Captive Generating / Cogeneration plants and running in parallel with the Grids of OPTCL. Hon'ble Commission vide its order in case no. 44/2024 directed OPTCL to submit a consolidated report considering the observations/queries raised by the stakeholders in the earlier Cases filed by OPTCL. In compliance to above, OPTCL has filed the requisite report before Hon'ble Commission on 29.01.2025. There is no further direction from the Hon'ble Commission in this regard.

2. The objections not specifically admitted may be deemed to have been denied.

PRAYER

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of M/s. Vedanta Limited while approving ARR and Transmission Tariff of OPTCL for FY 2026-27 & Truing up application for FY 2024-25.

NOTARY
Bhubaneswar
05.07.2030
GOVT. OF ODISHA

Bhubaneswar
January 27, 2025

By the Applicant
Through

Sr. GM (El.), RT&C

Annexure-01

ODISHA ELECTRICITY REGULATORY COMMISSION
BIDYUT NIYAMAK BHAWAN
PLOT NO. 4, CHUNOKOLI, SHAILASHREE VIHAR,
BHUBANESWAR – 751021
****

No. OERC/DIR(T)-332/08 /480
Dated: 01/05/2024

To

The Chairman-cum-Managing Director,
OPTCL Ltd, Janpath, Bhubaneswar-22

Sub: Calculation of Transmission charges for Long, Medium& Short-Term Open Access (RE)inaccordance with OERC (Promotion of Renewable Energy through Green Energy Open Access) Regulation, 2023.

Ref: OPTCLletter No. RT&C-Bill-09/2023-24/ 43 (4) dated 13.02.2024.

Sir,

With reference to the subject cited above, I am directed to intimate you that, theRegulation 11(1) (b) under "Transmission charges" of the OERC (Promotion of Renewable Energy through Green Energy Open Access) Regulation, 2023 specifies that:

" (1) TransmissionCharges

*b) **For use of InSTS:** As determined by the Commission in the ARR & Tariff Order for the relevant year. It shall be Rs./MW-Day for Long Term Access (LTA) and Medium Term Open Access (MTOA) whereas it shall be Rs./kWh for Short Term Open Access (STOA):*

Provided that for RE generation inside the State, thetransmission charges shall be computed Rs./kWh for long, mediumand short term open access. The applicable normative losses shall be borne by the Green Energy OpenAccessconsumers in kind through additional injection;

Provided further that for RE generation outside the State, the Intra-State transmission charges & losses shall be borne by Green Energy OpenAccessconsumersasperapplicableRegulations;

Provided further that the concession/exemption of the transmission charges applicable for Green Energy Open Access transaction shall be as determined & approved by the Commission in the Tariff Order of relevant year. "

Further, regulation 20 (2) of OERC (Terms and Conditions of Intra-State Open Access) Regulations, 2020 regarding the transmission charges specifies as follows:

"xxxxx. Provided that transmission charges shall be payable on the basis of contracted capacity in case of long-term and medium-term open access consumers and on the basis of scheduled load in case of short-term open access consumers. For Open Access for a part of a day, the transmission charges shall be payable on pro-rata basis; xxxx"

As per the aforementioned Regulation11(1) (b) of the OERC (Promotion of Renewable Energy through Green Energy Open Access) Regulation, 2023, for RE generation inside the State, the applicable normative losses shall be borne by the Green Energy Open Access consumers in kind through additional injection and for the RE generation outside the State, the transmission losses shall be borne by Green Energy Open Access consumers. So, it is implied from the above that the transmission loss is a part of the consumption of energy and is made up through additional injection. In view of the above, it is clarified that for RE generation inside the State, thetransmission charges shall be computed Rs./kWh for Long Term Access (LTA), Medium Term Open Access (MTOA) and Short Term Open Access (STOA)based on the actual energy consumption.

Calculation of transmission charges on actual energy basis for inter-state transactions will be difficult as the actual energy injected for the same transaction is not available with SLDC since it is based on scheduled energy as available from RLDC. Therefore, the charges for use of Intra-State network under Inter-State Open Access transactions of Renewable Energy shall be based on the energy which will be derived from their schedule as available with SLDC. The charges for Inter-State transaction of renewable energy for use of Intra-State network shall be paid on the basis of Rs./kWh.

Further, OERC has notified OERC (Promotion of Renewable Energy through Green Energy Open Access) Regulation, 2023 in the Odisha Gazette on 11.01.2024 which is effective from the date of its notification in such Gazette. All renewable energy Open-access transactions undertaken through the Intra-State network shall be governed under this Regulation from the effective date of Regulation notwithstanding any open-access transactions which had been continuing from a date prior to the effective date of the present Regulation.

This clarification is issued in exercising power under Regulation 15 (Power to remove difficulties) of OERC (Promotion of Renewable Energy through Green Energy Open Access) Regulations, 2023.

Yours sincerely,

SECRETARY

1.5.24

CC:

1. The Principal Secretary,Dept. of Energy, Govt. of Odisha, 2nd Floor, Kharavel Nagar, Keshari Marg, Bhubaneswar-751001.

2. The Chief Load Despatcher, SLDC, GRIDCO Colony, P.O. Mancheswar Rly. Colony.Bhubaneswar- 751022.
3. The Chief Executive Officer, TPCODL, Power House Square, Unit-8, Bhubaneswar-751012.
4. The Chief Executive Officer,TPWODL, Burla, Sambalpur-768017.
5. The Chief Executive Officer,TPSODL, Courtpeta, Ganjam, Berhampur-760010.
6. The Chief Executive Officer,TPNODL, At/PO – Januganj, Balasore-756019

BEFORE THE
ODISHA ELECTRICITY REGULATORY COMMISSION
PLOT NO. 4, CHUNUKOLI, SAILSHREEVIHAR, CHANDRASEKHARPUR, BHUBANESWAR-751021

Case No.121/2025

IN THE MATTER OF: Reply of GRIDCO to the application filed by OPTCL for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

And

Reply of GRIDCO to the Truing up application for FY 2024-25 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 filed by OPTCL.

IN THE MATTER OF: Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar-751007.

...Applicant

IN THE MATTER OF : GRIDCO Limited, Janpath, Bhubaneswar-751022

...Respondent

THE HUMBLE RESPONDENT ABOVE NAMED MOST RESPECTFULLY SHEWETH:

1. GRIDCO is the Bulk Supply Licensee and the principal procurer and supplier of power to the Distribution Licensees of Odisha. It is also a long-term user of the State transmission system operated by OPTCL.

2. GRIDCO has carefully examined the ARR and Transmission Tariff application filed by OPTCL for FY 2026-27 and submits this response in the interest of grid reliability, financial prudence and consumer protection.

3. Odisha's electricity demand, industrial load and renewable energy integration have increased substantially over the last decade. This has led to:

   - Expansion of transmission lines and substations,
   - Higher loading on existing assets,

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- Greater complexity of grid operation.

4. The State Transmission Utility must therefore remain financially viable to ensure:
   - System security,
   - Timely maintenance,
   - Renewable evacuation,
   - Reliable power supply to DISCOMs and consumers.

   GRIDCO is of the view that OPTCL's ARR must provide sufficient revenue to sustain these critical functions.

5. **Major Cost Components**

5.1 Operation & Maintenance (O&M)

The large increase in OPTCL's asset base, substations and circuit kilometers reasonably justifies the rise in O&M and R&M expenditure. Deferred maintenance in a transmission system leads to outages, safety hazards and system failures, which are ultimately costlier for the State. Effective O&M also ensures required quantum of power for adequate recovery of revenue.

5.2 Employee Cost and Terminal Benefits:

OPTCL's employee cost includes statutory pension, gratuity, NPS contributions and actuarially assessed liabilities. These are fixed in nature and may be allowed in ARR. Further, manpower shortage in OPTCL has already impacted project execution and maintenance, hence recruitment and training expenditure is necessary.

Even with advancements in automation, SCADA and modern protection systems, the absence of adequate skilled and trained manpower is already impacting, and may further adversely affect, the operation, maintenance and timely execution of transmission projects.

As evident from OPTCL's ARR application, the total number of employees is projected to be only about 2,722 as on 01.04.2027, which appears grossly inadequate considering the continuous expansion of the transmission network in terms of line length, substations and transformation capacity.

Further, as per the actuarial valuation report, the number of employees allocated to GRIDCO/OPTCL stood at 5,974 as on 31.03.1999. This number declined to 3,934 as on 31.03.2014 and is now projected to further reduce to 2,722 by 01.04.2027. Thus, over a period of about 26 years, the employee strength shall decline by nearly 55%.

In contrast, the Gross Fixed Assets (GFA) of OPTCL have increased exponentially during the same period. While the GFA as on 31.03.1999 was

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₹1,178.93 crore, it is projected to increase to ₹10,059.83 crore as on 31.03.2025, i.e., an increase of more than 8.5 times. This indicates a sharp mismatch between the growth of physical assets and the availability of manpower required to operate and maintain those assets.

Such a steep decline in employee strength, despite manifold growth in the transmission system, poses a risk towards operational sustainability required for a modern, high-voltage grid. Transmission is a safety-critical and reliability-critical function, and under-manning always invites serious risks in terms of outages, delayed restoration, asset failures and safety of personnel.

Therefore, it is humbly submitted that OPTCL may be directed by the Hon'ble Commission to take immediate steps to fill up vacant posts and augment its manpower on an urgent basis, so as to ensure safe, reliable and efficient operation of the State transmission system and to prevent any impending operational or system-security crisis.

5.3 Capital Expenditure (CAPEX)

a) The proposed CAPEX of ₹2,561 crore by OPTCL is essential to:

- support Odisha's rapidly growing industrial demand,
- enable large-scale integration of renewable energy, and
- reduce congestion, technical losses and system vulnerabilities.

This CAPEX is therefore not routine expenditure but a strategic investment in grid reliability and economic growth.

b) OPTCL's role is central to Resource Adequacy. While GRIDCO is responsible for arranging generation and power procurement, OPTCL determines whether that power can physically reach consumers. Resource adequacy is meaningless unless the transmission system has the capacity and resilience to deliver power from generators to load centres.

c) In this context, OPTCL ensures that:

- generation is evacuated from power plants and renewable energy zones,
- power flows smoothly to load centres,
- renewable energy is absorbed without curtailment, and
- system contingencies do not result in load shedding.

Thus, transmission capacity and reliability are fundamental in meeting Odisha's supply obligations.

d) It is submitted that during peak demand periods, grid bottlenecks — rather than lack of generation — are often the real cause of shortages. Even when adequate

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NATABAR MOHANTY
BHUBANESWAR
ON 20.94
06.07.2026

generation exists, failure of a line, transformer or substation can isolate large pockets of load. OPTCL is therefore required to build N-1 redundancy and alternative pathways so that power remains deliverable even if one or more elements fail.

e) It is further submitted that under-funding OPTCL directly threatens resource adequacy. In the absence of adequate CAPEX:

- transmission projects get delayed,
- lines and substations become overloaded,
- maintenance is deferred,
- renewable energy gets curtailed, and
- contingencies translate into blackouts instead of being managed seamlessly.

Such outcomes would be contrary to consumer interest and system security.

f) As per the Odisha Renewable Energy Policy, 2022 (OREP-22), the State targets around 10 GW of renewable energy by 2030. Achieving this scale of RE integration requires corresponding investments in:

- pooling substations,
- new 400/220/132 kV evacuation corridors, and
- grid strengthening to manage intermittency and variability.

These infrastructure elements form a significant part of OPTCL's proposed CAPEX.

g) The Odisha Pumped Storage Project (PSP) Policy supplements OREP-22 and explicitly integrates transmission infrastructure into project execution. While PSP developers build lines and bays up to the grid interconnection point, these assets must be integrated, operated and reinforced by the STU, i.e., OPTCL. Further, pumped storage entails large, fast and bidirectional power flows, requiring a stronger, more resilient transmission system than conventional system.

Accordingly, OPTCL must incorporate PSP evacuation and it's injection into the network planning and system operations.



It is to submit that OPTCL's CAPEX is the physical foundation of Odisha's renewable targets, storage-based grid balancing and 24×7 power availability. When the Hon'ble Commission considers OPTCL's ARR and CAPEX, it is not merely approving a utility budget — it is approving the backbone of Odisha's energy transition.

Any disallowance or curtailment of this CAPEX may:

- undermine the Renewable Energy Policy,
- neutralize the Pumped Storage Policy,
- create grid bottlenecks and renewable curtailment, and
- increase long-term costs for consumers.

Hence, OPTCL's proposed CAPEX deserves full regulatory support.

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5.4 Group Insurance, Accident Cover and Rehabilitation Assistance

a) OPTCL employees work in high-risk environments including live line maintenance (ERS/Hotline maintenance). Given rising medical inflation and accident risk, provision for:

- Group Health Insurance
- Group Personal Accident Insurance
- Rehabilitation corpus

is both humane and necessary for a critical infrastructure organization.

b) Several States have institutionalised Group Personal Accident Insurance (GPAI) for electricity sector employees, recognising the inherently hazardous nature of power sector operations.

These schemes, though State-sponsored, clearly demonstrate the industry- wide expectation and regulatory recognition that employees engaged in power sector operations require high-value accident insurance coverage commensurate with the serious occupational risks involved. This reflects a growing consensus that GPAI is an essential risk-coverage instrument for maintaining workforce security, morale and grid reliability, rather than a discretionary welfare benefit.

5.5 Repair & Maintenance (R&M)

a) OPTCL's grid consists of aging and heavily loaded assets, many of which were installed during OSEB era. The system now operates close to thermal and fault limits due to:

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- Industrial growth
- Renewable integration
- 24×7 power demand

b) As per the provision 8.15 of OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014, the Repair and Maintenance expenses would be allowed at the rate of 2.5% of Gross Fixed Assets (GFA) only on assets owned by the transmission company, for each year of the Control Period.

c) The gross fixed asset is projected to increase to ₹10,059.83 crore as on 31.03.2025. Accordingly, the allowable R&M expense should be around 251.5 Crores i.e. 2.5% of the GFA. Hon'ble Commission may allow the R&M expenses in accordance in the relevant Regulation.

5.6 A&G Expenses

OPTCL's number of establishments has almost doubled over the last 12–13 years due to expansion of substations, transmission corridors and grid operations, leading to a significant increase in administrative, compliance, IT, HR, safety and regulatory functions. However, the A&G framework under the OERC Transmission Tariff Regulations, 2014 does not reflect this structural growth and has become outdated.

Since OPTCL and DISCOMs incur similar categories of A&G expenses, and the Hon'ble Commission under its 2022 Tariff Regulations for DISCOMs has allowed 7% annual escalation, OPTCL's request for A&G escalation at the same rate is reasonable, equitable and consistent with regulatory practice.

Accordingly, OPTCL may be allowed A&G expenses in line with the provisions applicable to DISCOMs, to ensure cost realism and efficient management of the expanded transmission network.

5.7 Interest on Loan

OPTCL has funded large capital works from its own equity. As per Regulation 8.18 of OERC Regulations, 70% of such equity may be treated as normative loan, entitling OPTCL to interest recovery. This prevents penalising OPTCL for prudent financial management.

Hence, OPTCL may please allowed such interest recovery at the weighted- average interest rate.

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5.8 Rebate

OPTCL has prudently projected 2% rebate amounting to ₹27.53 crore for FY 2026-27 based on the projected ARR. Since rebate is a statutory requirement linked to payment timelines, it is an unavoidable component of OPTCL's ARR and may be allowed in full.

5.9 Depreciation

OPTCL has projected the book value of own assets to reach ₹7,132.91 crore as on 31.03.2027, of which nearly 90% (about ₹6,383 crore) pertains to Plant and Machinery, reflecting investment in core transmission infrastructure.
Further, during FY 2026-27, OPTCL has projected an addition of ₹1,041.41 crore in Plant and Machinery, which again constitutes around 90% of total fixed asset additions.

The depreciation claimed by OPTCL is therefore directly linked to CAPEX investments in transmission assets required for execution of new projects, renewable evacuation, grid strengthening and system reliability. Since these assets are essential for providing regulated transmission service, the depreciation cost projected for FY 2026-27 may be allowed as per Regulatory norms.

5.10 Return on Equity (RoE)

OPTCL has claimed RoE of 279.11 crores on the Book value of own Assets which is to the tune of 6002.32 crores as on 31-03-2026. The claim of OPTCL is in accordance with the prevailing regulations of OERC and same may please be allowed by the Hon'ble Commission.

5.11 Income Tax and other miscellaneous claims:

Any other claims by OPTCL may be allowed in line with the prevailing Regulations and keeping in view the consumer interest.

6. It is respectfully submitted that the proposed OPTCL transmission tariff of about 35.61 paise per unit for FY 2026-27 may be due to significant capital investments being undertaken for expansion and strengthening of the State transmission network. These investments will enhance the capacity, reliability and reach of the grid, thereby enabling OPTCL to deliver higher volumes of power efficiently to consumers across the State. Upon operationalisation of such network, the increased volume of power may reduce the transmission tariff in future.

   The ongoing and proposed expansion of OPTCL's network will also reduce Odisha's dependence on the Central Transmission Utility (CTU) network for evacuation and transfer of power, which otherwise involves higher

NOTARY ODISHA GOVT. OF

transmission charges and additional losses. Accordingly, the present investments in intra-state transmission infrastructure will result in long-term cost savings and improved supply security for consumers, making the proposed tariff both prudent and in public interest.

7. Several states recognise the principle of levying grid support or parallel operation charges on captive generators/co-located plants. There is no uniform national approach, but many regulators have established mechanisms to recover the cost of services provided by the grid, and where charges are permitted, a significant part is often passed through to end consumers after prudence and tariff order approvals. As per practice in many States of the country, Grid Support charges issue once decided may may aid in reduction of Transmission Tariff as well as reduction in ARR of DISCOMs by certain extent.

8. Based on practices in other states, reactive energy charges are a recognized part of transmission and open access frameworks, often linked to penalizing VAR drawl/injection beyond acceptable voltage/power factor limits, and encouraging power quality maintenance. Reactive energy charges are standard regulatory practice across India, and Odisha's own reactive energy regime requires to be aligned with such principles for grid efficiency and subsequent costs. Hence, in line with the above, OPTCL may be allowed to recover the proposed charges towards reactive energy till the reconstitution of the reactive pool is undertaken.
9. It is further submitted that industries, including captive generating plants aggregating about 12,000 MW, frequently inject and draw substantial quantum of reactive power (VARs), which adversely impacts voltage profile, system stability and network loading. Such uncontrolled VAR exchange imposes additional operational and capital burden on OPTCL, requiring deployment of reactors, capacitors, voltage control equipment and active grid management. In this context, the Hon'ble Commission may kindly consider formulating appropriate regulatory provisions to penalise such erring entities for excessive VAR injection or drawal, based on grid conditions and power quality parameters. The proceeds of such penalties may be credited to OPTCL to compensate for the costs incurred in maintaining grid stability, rather than allowing such costs to be recovered from domestic and small consumers, who do not contribute to the problem. This would ensure that costs are allocated based on causation, promote grid discipline among large industrial and captive users, and protect the interests of ordinary consumers.

10. It is respectfully submitted that OPTCL's truing-up proposal may be allowed in accordance with the applicable Regulatory provisions, after due diligence and suitable prudence check, as the same reflects actual audited costs incurred in the course of providing regulated transmission services.

11. In view of the above submissions, it is respectfully submitted that OPTCL's projections for CAPEX, manpower, A&G expenses, insurance costs, depreciation, rebates and performance-linked incentives are essential for maintaining a safe, reliable and future-ready transmission system.

    OPTCL's network is the backbone of Odisha's power sector, enabling industrial growth, renewable energy integration, pumped storage deployment and 24×7 power supply. Any under-allowance of legitimate costs or

Bibhu Prasad Mohanty

NOTARY GOVT. OF ODISHA

investments may directly impair resource adequacy, grid security and consumer interest.

The Hon'ble Commission is therefore humbly requested to consider OPTCL's ARR and associated claims in line with the prevailing Regulations and keeping in interest the consumer's interest, so that the State's transmission system remains capable of supporting Odisha's evolving energy landscape in a secure, efficient and sustainable manner.

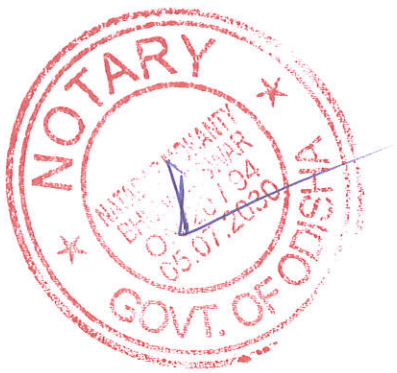
By the Respondent

Through

Bhubaneswar

15th January, 2026

Chief General Manager (PP)



BEFORE THE
ODISHA ELECTRICITY REGULATORY COMMISSION
PLOT NO. 4, CHUNUKOLI, SAILSHREEVIHAR, CHANDRASEKHARPUR, BHUBANESWAR-751021

Case No.121/2025

IN THE MATTER OF: Reply of GRIDCO to the application filed by OPTCL for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

And

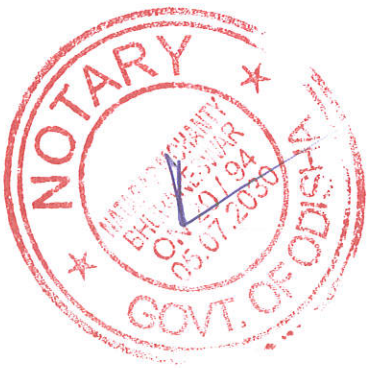
Reply of GRIDCO to the Truing up application for FY 2024-25 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 filed by OPTCL.

IN THE MATTER OF: Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar-751007.

...Applicant

IN THE MATTER OF : GRIDCO Limited, Janpath, Bhubaneswar-751022

...Respondent



Affidavit verifying the Application

I, Shri Bibhu Prasad Mohapatraas, aged about 59 years, S/o Late Shri Biswanath Mohapatra, Chief General Manager (Power Purchase), GRIDCO do hereby solemnly affirm and say as follows:

I am the Chief General Manager (Power Purchase) of GRIDCO Ltd., the Applicant in the above matter and am duly authorized to make this affidavit on its behalf.

The Statements made in the foregoing Paragraphs of this Compliance to the ARR & BSP Application herein are based on information and I believe them to be true.

Bibhu Prasad Mohapatra

DEPONENT

Bhubaneswar
15th January, 2026

SWORN BEFORE ME

N. MOHANTY
NOTARY
Regd. No.ON 20/94
382, Bhoi Nagar,
Bhubaneswar-751022

16.01.2026

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
PLOT NO. 4, SAILESHREE VIHAR,
CHANDRASEKHARPUR, BHUBANESWAR-751021

CASE NO. 121/2025
FILING NO. 3

IN THE MATTER OF: (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

And

(ii) Truing up application for the FY 2024-25 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

AND
IN THE MATTER OF: Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

..... Applicant

vrs

M/s. GRIDCO Limited, Janpath, Bhubaneswar-751022, Odisha and **16 others.** **..... Objectors**

Rejoinder to the objections raised by the Objector M/s. GRIDCO.

The humble applicant above named

MOST RESPECTFULLY SHEWETH:

1. That, the Objector M/s. GRIDCO Ltd (Sl No-12) vide affidavit dated 15.01.2026 has raised certain submissions on ARR & Transmission Tariff Application of OPTCL for FY 2026-27 and Truing up application for FY 2024-25. In reply, OPTCL submits its rejoinder to the submissions in the following paragraphs.

Rejoinder to Para 3 to5:

GRIDCO vide para 3 to 5 has justified the proposal made by OPTCL. However, some more clarification is furnished below:

Regarding reduction in Man-in-Position:

The respondents have cited the manpower position as 5,974 as on 31.03.1999 and 3,934 as on 31.03.2014. In this regard, it is submitted that during the year 1999, the erstwhile GRIDCO predominantly executed the construction of Grid Substations through its own workforce, mainly comprising NMR personnel (non-executives), under the supervision of engineers. Over time, however, project execution activities have gradually been outsourced to EPC and rate contractors. Consequently, the role of OPTCL employees has been largely confined to planning, preparation of estimates, and supervision.

Further, the existing sanctioned strength of OPTCL has been fixed in the year of 2013. However, OPTCL has adopted many advance technologies like

1. Implementation of SCADA in Grid Substations (under progress);
2. Introduction of unmanned operations through STAMS (under progress);
3. Implementation of SAP for asset management and human resource management; and
4. Adoption of the e-Office system for file movement.

The aforesaid technological advancements have significantly streamlined routine clerical functions as well as shift operations in Grid Substations. Furthermore, these initiatives have enabled OPTCL to optimally redeploy existing manpower to areas where their presence is most required, such as project execution, operation and maintenance activities, transmission planning, standardization, and other core functions.

Rejoinder to Para 6:

As rightly pointed out by GRIDCO, the ISTS transmission charges are comparatively higher than OPTCL's transmission charges. It is, therefore, more economical to construct evacuation systems for upcoming generators rather than utilizing the ISTS network, as this would reduce the ultimate burden on consumers. Accordingly, a marginal increase in transmission charges may be permitted in the interest of consumers.

Rejoinder to Para 7:

Respondent is in support of levy of Grid support charges.

Rejoinder to Para 8 &9:

Respondent is in support of Reactive energy charges to bring discipline among users.

Rejoinder to Para 10 & 11:

The statements are a matter of record only.

2. The objections not specifically admitted may be deemed to have been denied.

PRAYER

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of M/s. GRIDCO while approving ARR and Transmission Tariff of OPTCL for FY 2026-27 & Truing up application for FY 2024-25.

By the Applicant
Through

Bhubaneswar
January 27, 2026

Sr. GM (El.), RT&C



BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION

AT- PLOT NO.-4, CHUNOKOLI, SHAILASHREE VIHAR, BHUBANESWAR-21.

CASE NO:- 121/2025

FILING NO:- 01

IN THE MATTER OF:

Public comments invited for in the public notice dt 17.12.2025 by OERC against the petition filed by OPTCL under Section 64(2) of the Electricity Act, 2003 for approval of ARR & Determination of Transmission Tariff for the FY27 & Truing up Petition for FY25 in terms of Sections 62, 64 and 86 of the Electricity Act, 2003 read with OERC (Conduct of Business) Regulations-2004 and OERC (Terms & Conditions for Determination of Transmission Tariff) Regulations, 2014.

AND

IN THE MATTER OF:

MD, OPTCL Ltd, Janapath, Bhubaneswar-751022.....**Petitioner**

Vrs.

SHRI ANANDA KUMAR MOHAPATRA, Freelance Power Analyst, aged about 57 years, S/o Late Jachindra Nath Mohapatra, Plot No.- 799/4, Kotitirtha Lane, Old Town, BBSR-02, anandamohapatra22@gmail.com .....**Respondent**

16 JAN 2026

AFFIDAVIT

NOTARISED

I, **SHRI ANANDA KUMAR MOHAPATRA,** S/o Late Jachindra Nath Mohapatra, Plot No.- 799/4, Kotitirtha Lane, Old Town, BBSR-02 do hereby solemnly affirm and state as follows:

1. That I am the Freelance Power Analyst of the State of Odisha & the Respondent in the above matter Case No. 121 of 2024.
2. That the facts stated above are true to the best of my knowledge.

SWORN BEFORE ME

Identified by

ADVOCATE

Advocate

Place: **Bhubaneswar**

Date: 16.01.2026

NOTARY ★ GOVERNMENT OF ODISHA ★ D.S. SAMANTARAY REGD. NO. 88/2012 DIST-KHURDA BBSR, ODISHA MOB-9439143015

Ananda Kumar Mohapatra

16.01.2026

DEPONENT

Power Analyst Odisha

DUSASAN SAMANTARAY
NOTARY, GOVT. OF ODISHA
BHUBANESWAR, ODISHA
REGD. NO. 88/2012
MOB-9439143015

BEFORE ODISHA ELECTRICITY REGULATORY COMMISSION

AT- PLOT NO-4, CHUNOKOLI, SHAILASHREE VIHAR, BHUBANESWAR-21.

CASE NO:- 121 of 2025

FILING NO:-1

IN THE MATTER OF:

The Electricity Act-2003 & the Rules, Regulations, Codes, Plans & Policies notified there under.

AND

IN THE MATTER OF:

Application filed by M/s Odisha Power Transmission Corporation Ltd (OPTCL) under Section 64(2) of the Electricity Act, 2003 for approval of Annual Revenue Requirement (ARR) & Determination of Transmission Tariff for the FY27 & Truing up Petition for FY25 in terms of Sections 62, 64 and 86 of the Electricity Act, 2003 read with OERC (Conduct of Business) Regulations-2004 and OERC (Terms & Conditions for Determination of Transmission Tariff) Regulations, 2014 for consideration by OERC.

AND

IN THE MATTER OF:

Public Comments as invited for in the Public Notice dt. 17.12.2025 by OERC as per section 64(2) of the Electricity Act' 2003 and relevant provisions of the OERC (Conduct of Business) Regulations-2004 for consideration by Ld Commission.

AND

IN THE MATTER OF:

Managing Director, OPTCL Ltd, Janapath, BBSR-751022 .....**Applicant**

Vrs.

SHRI ANANDA KUMAR MOHAPATRA, Freelance Power Analyst, aged about 57 years, S/o Late Jachindra Nath Mohapatra, Plot No.- 799/4, Kotiteertha Lane, Old Town, BBSR-751002, Email:- anandamohapatra22@gmail.com

.....**Respondent**

Most Respectfully SHEWETH:

The issue of filing of e-Public comments by the Stakeholders was submitted before the learned Commission for consideration during the tariff proceeding for FY25. The Ld Commission had been pleased to allow the stakeholders to file e-Public comments and accordingly we are filing herewith e-public comments for the kind consideration by the learned Commission as under:

1. **Financial Statement for FY25:** The Petitioner files ARR & Transmission Tariff for FY27 and True up 25 in the instant petition. The true up petition for FY25 considers the audited Financial Statements (FS) for FY25. The true up exercise in the instant proceeding forms the basis for approval of ARR & determination of Transmission Tariff for FY27. Therefore, it is necessary to scrutinise the audited financial statements for FY25 disclosed by the Petitioner in the proceeding to true up the Approved ARR & Transmission for FY25 and for approval of ARR & determination of Transmission Tariff for ensuing FY27.

Power Analyst Odisha

1.1 **Balance Sheet as on 31.03.2025:** As per the audited Balance Sheet as on FY25, the total assets of the STU stands at Rs. 10739.66 Cr out of which non-current assets comprises 7770.82 Cr and current assets Rs 2968.84 Cr. The Line Networks including the property of the Licensee was worth of Rs. 5264.29 Cr by FY24 and increased to Rs. 5360.26 Cr as on FY25. Similarly, the value of CWIP (Capital Works-in-Progress) was Rs. 1720.16 Cr as on FY24 and increased to Rs. 2060.36. This shows that the rate of increase of Line networks in comparison to CWIP is very less. The slow growth of line networks in comparison to CWIP reveals that the Investment done for line networks does not earn desired results due to sluggish capitalisation. The Utility records huge cash & bank balance to the tune of 2236.14 Cr as recognised by the auditor. This establishes that the Utility does not need any working capital loan to operate the enterprise. Coming to the liability side of Balance Sheet, the Licensee records total equity of Rs. 3367.38 Cr out of which Rs. 471.99 Cr is other equity inclusive of profits or say retained earnings. The long term borrowing of the Licensee stands at 1696.60 Cr whereas the other non-current liabilities is Rs. 2349.52 Cr. The borrowing has reduced in comparison to previous FY24. The Deferred Income provided for the Assets created out of Govt grant & deposit works is recognised by the auditor at Rs. 2063.94 Cr. and Rs. 140.71 Cr. Therefore, I may urge upon the learned Commission to true up proposal of the licensee considering the above recorded line networks and deferred income recognised by the Auditor as on FY25.

NOTARY GOVERNMENT OF ODISHA

1.2 **Profit & Loss (P&L) Account for FY25:** That the total revenue for FY25 recognised by the auditor is Rs 1398.60 Cr against previous FY24 total of Rs 1298.89 Cr out of which other income is Rs. 281.01 Cr. There is little bit reduction of employees cost & stands at Rs. 479.45 Cr whereas the other expenses have increased. The total expenditure of the Licensee for FY25 recognised by the auditor is Rs. 1236.69 Cr, thereby leaving a surplus revenue balance of Rs. 161.91 Cr before payment of taxation. The tax adjustments during FY25 shows recovery of tax to the tune of Rs. 75.79 Cr, resulted the profit after tax increased to Rs. 237.70 Cr. and finally the net profit is arrived at Rs. 237.82 Cr. The Govt of Odisha Public Enterprise derives net profits to the tune of Rs. 237.82 Cr during FY25 but it is very much surprising to note that the licensee has proposed for increase of Transmission Tariff by 13 P/U for FY27. The Finance Division of OPTCL derives profit whereas the Commercial division (regulatory in nature) bats for increasing the tariff. The above two divisions of OPTCL are functioning in opposite directions without any common goal. The paradoxical functioning of the Finance & Commercial Divisions of OPTCL puts question on the vision & mission laid down behind constitution of public enterprises by Govt of Odisha. The matter which worries us most is that, there are plenty of professionals belong to Accountancy, Economics, Engineering and Law employed by Govt of Odisha to work in line with the mission and vision of public enterprise but it is established as above that they have failed to accomplish the goals. This question needs to be addressed by the learned Commission failing which further tariff hike will aggravate the crisis seen in the power tariff of the State in comparison to national scene.

1.3 **The Mission, aims & objectives of Public Enterprises are defeated:** There are six major Public Sector Enterprises (PSUs) such as GRIDCO, OPTCL, OPGC, OCPL, OHPC and GEDCOL are operating in Odisha. The Government of Odisha constituted the Public Enterprises with the primary mission to drive economic growth with social justice and promoting the welfare of the people while operating on commercial principles. The fundamental aim was the welfare of the people and protection of public interest, with profit generation being a secondary goal. PSUs are intended to accelerate the state's economic growth by developing basic and heavy industries and providing essential infrastructure like power, manufacturing, mining, etc. The Govt of Odisha passed out Odisha Electricity Reform Act, 1995 with the basic objective to supply uninterrupted and quality power at affordable tariff to the millions

consumers of Odisha. Therefore, it was binding in the part of above named six PSUs to upkeep the aims & objectives of the Reform Act but they are not discharging their duties as reveals from their tariff petitions. The PSUs operating in State Power Sector are deriving profits from operation but they are proposing for tariff hike by missing their lawful duties & functions as provided while constituted. That means, the aims and objectives behind the constitution of SPSUs are defeated in Odisha, resulted the one crore Consumers of Odisha are paying high tariff more than the national average and uninterrupted and quality power supply is not yet ensured by them. The need of the time is to remind them their duties. The primary goal of the PSUs is public welfare whereas profit is their secondary goal. Therefore, I hereby urge upon the learned Commission to take on record of above anomalies arising in the functioning of above named six SPSUs and initiate necessary action to bring them into track built by Govt of Odisha for the functioning of the PSUs in the State.

Power Analyst Odisha

2. **Performance Review of OPTCL for FY25:** The Transmission Tariff Regulations of OERC wants the learned Commission to review the performance of the Transmission Licensee for previous FY25 before the commencement of tariff proceeding. I don't know, whether the Commission reviewed or not? But the Commission use to publish the annual performance review of OPTCL in OERC website every year before the month of October. Performance Review Report of the Licensee ahead of annual tariff proceeding is a useful document for the stakeholders to comment on the tariff petitions. I have brought the above non-compliance to the notice of the learned Commission vide a email communication on dated 18.11.2025 but that was not done yet. In the tariff proceeding for FY27, the Stakeholders are deprived to view the performance review reports of OPTCL. Therefore, I may urge upon the learned Commission to initiate necessary action for supply us the performance review reports of OPTCL and SLDC in compliance to the OERC regulations.

Truing up for previous FY24:

3. **Regulatory Surplus of Rs. 48.50 Cr approved by OERC is dismissed by OPTCL at its sweet will in the true up table for FY25:** No appeal was preferred by the licensee against the approved regulatory surplus of Rs. 48.50 Cr in transmission tariff for FY25 but former dismissed the same in the true up table as per his sweet will. The story is like this. That the Petitioner submits an abstract of truing up for the

FY25 in the Table-30 of the petition which is extracted by us and presented below for the ready reference of the learned Commission. The Petitioner submits to true up a sum total of the expenditure of Rs. 1296.61 Cr for FY25 against which the Commission had approved a sum of Rs. 1264.95 Cr, thereby leaving negative gap of Rs. 31.66 Cr to be recovered from tariff. As submitted in the table below, the Petitioner trued up Rs. 347.51 Cr under the head revenue from inter-state wheeling and miscellaneous receipts against which the Commission had approved Rs. 302.75 Cr, thereby showing excess tariff recovery of Rs. 44.76 Cr. The regulatory surplus of Rs. 48.50 Cr was considered by the Commission while determined the transmission tariff for FY25 whereas the Petitioner did not true up the same. The Petitioner has treated the above approved regulatory surplus as deficit revenue & said that it is to be recovered from tariff. That means, the Petitioner disputed the regulatory surplus of 48.50 Cr at its sweet will without preferring any appeal at higher forums. The dismissal of 48.50 Cr in the process truing up by the Petitioner is unlawful and unacceptable to Stakeholders. Therefore, it is urged upon the learned Commission pass out the same in the truing up process for FY25 for the purpose of determination of transmission tariff for FY27.

Power Analyst Odisha

Particulars / Year	(Cr.)			
	OERC Approval	Actual Audited A/c	Truing up	Surplus/ (Deficit)
Expenditure				
A. Employee Cost (Net)	488.63	473.39	473.39	15.24
B. R & M Cost	135.00	149.01	149.01	-14.01
C. A & G Cost (Including SLDC and GCC)	37.05	44.76	41.60	-4.55
Sub-Total (A+B+C)	**660.68**	**667.16**	**664.00**	**-3.32**
D. Depreciation	275.67	408.91	269.89	5.78
E. Interest on long-term liability	133.95	131.38	131.38	2.57
F. Rebate	20.16	15.93	15.93	4.23
G. Incentive for system availability	5.00	5.00	13.73	-8.73
H. GCC Expenses	0.35	-	-	0.35
Sub-Total (A to H)	**1,095.81**	**1,228.38**	**1,094.93**	**0.88**

NOTARY GOVERNMENT ODISHA

I. Return on Equity	162.14		173.12	-10.98
J. Income tax	7.00		28.56	-21.56
Grand Total (A to J)	**1,264.95**	**1,228.38**	**1,296.61**	**-31.66**
Less: *Inter-state wheeling & Misc Rev*	302.75	347.51	347.51	44.76
Less: *Regulatory Surplus*	48.50	-	-	-48.50
Net Transmission Cost	**913.70**	**880.87**	**949.10**	**-35.40**
Revenue from Transmission Ch	913.76	896.09	896.09	-17.67
Truing up difference FY25	**-0.06**	**-15.22**	**53.01**	**-53.07**

Power Analyst Odisha

3.1 **Revenue for a sum of Rs. 155 Cr is not trued up by Licensee:** The Petitioner submits the audited Financial Statements for FY25 for the purpose of true up approved ARR and Transmission Tariff for FY25. The Auditor has recognised a sum of Rs. 1398.60 Cr as total revenue from operation inclusive of Rs. 281.01 Cr as Miscellaneous Income in the P&L Account for FY25 against which the Commission had approved earlier total revenue for a sum of Rs. 1216.51 Cr inclusive of Rs. 302.75 Cr as Miscellaneous Income. The Licensee trued up the total revenue for a sum of Rs. 1243.60 Cr including Rs. 347.51 Cr as Miscellaneous Income. To sum up the revenue account of the Licensee, the Commission approved total Revenue for a sum of Rs. 1216.51 Cr against which the Licensee trued up only Rs. 1243.60 Cr whereas in the process of true up the Licensee did not consider the total revenue of Rs. 1398.60 Cr recognised by the Auditor. This established the fact that the Licensee does not true of the differential revenue of Rs. 155 Cr (Rs.1398.60 - Rs.1243.60 Cr) recognised by the Auditor. For the ready reference of the learned Commission, I have presented below the audited P&L Account for FY25 disclosed by the Petitioner at Annexure-15 of the Petition. Therefore, I hereby urge upon the learned Commission to consider the untrued up revenue of Rs. 155 Cr recognised by the Auditor in the so as to make transmission tariff reasonable in the interest of the State.

NOTARY GOVERNMENT OF ODISHA DIST-KHURDA

3.2 **Excess Depreciation approved by OERC for FY25:** The learned Commission had approved Depreciation for a sum of Rs. 275.67 Cr in the Transmission Tariff Order for FY25 after considering the original Book Value of the Assets of Rs. 9014.70 Cr, up-valued assets Rs. 512.71 Cr, Govt grants & deposit works assets Rs. 1910.04 Cr, fully depreciated assets Rs. 1864.95 Cr, projected capitalisation for FY24 Rs. 631.99 Cr and the original

value of own assets as on FY24 Rs. 5358.99 Cr in the table-48 under para no 283. The sum of Depreciation amount of Rs. 275.67 Cr had been approved on the book value of own assets of Rs. 5358.99 Cr as on FY24 as per para no 283. But the Balance Sheet as on FY25 disclosed by the Petitioner in the audited Financial Statements at Annexure-15 speaks the different story on the Assets of the Licensee. For the ready reference of the learned Commission I have presented below the audited Balance Sheet of the Petitioner as on FY25. The Balance Sheet given below speaks that the PPE (Property, Plant & Equipments) of the Licensee is Rs. 5360.26 Cr and the Tangible Assets is Rs. 8.98 Cr. So the total value of the Assets recognised by the Auditor is Rs. 5369.14 Cr against which the Auditor reserves Deferred Income of Rs. 2063.94 Cr under Non-Current Liability and Rs. 140.71 Cr under Current Liability. So the Auditor has provided total deferred income of Rs. 2204.65 Cr as a reserve against the Assets created from Govt grants and Deposit works. That means the total Assets of Rs. 5369.14 Cr recognised by the Auditor in the balance sheet includes the Assets created out of Govt grants and Deposit works for Rs. 2204.65 Cr on which the Licensee will not get Depreciation allowance. It is submitted before the learned Commission that the Balance Sheet of the Enterprise shows the net value of the Enterprise at a specific point of time. Therefore, the Licensee will be allowed Depreciation only on Assets worth Rs. 3164.49 Cr (Rs. 5369.14 Cr – Rs. 2204.65 CR) but sorry to submit that the learned Commission had allowed Depreciation of Rs. 275.67 Cr on Assets worth Rs. 5358.99 Cr while approved the ARR of the Licensee for FY25 as stated above. The excess Assets worth Rs. 2194.50 Cr considered by the Commission for depreciation allowance is nothing but fully depreciated Assets (90%) which has not been recognised by the Auditor. The residual value 10% of those fully depreciated Assets cannot be considered in the process of calculation of depreciation. Therefore, I urge upon the learned Commission to consider the net value of Assets (after deducting deferred income assets) for Rs. 3164.49 Cr only in the instant proceeding to true up the Depreciation allowance for FY25.

Power Analyst Odisha

3.3 **Excess R&M Cost:** The learned Commission had approved a sum of Rs. 135 Cr (inclusive of Inspection fee Rs. 10.41 Cr) for R&M Cost against which the Licensee trued up a sum of Rs. 149.01 Cr, thereby seeking deficit of Rs. 14.01 Cr as a pass through in transmission Tariff. This needs to state here that R&M Cost is a controllable Cost; it cannot be approved more than the normative cost approved in the Transmission tariff regulations.

Odisha Power Transmission Corporation Limited

(A Government of Odisha Undertaking)

Regd. Office: OPTCL Tech Tower, Saheed Nagar, Bhubaneswar - 751007

CIN : U401020RSGC007553

Balance Sheet as at March 31, 2025

Amount in Rs. Crore

	Notes	As at 31.03.2025	As at 31.03.2024
Assets			
(1) Non-current assets			
(a) Property, plant and equipment	5	5,360.26	5,264.29
(b) Capital work-in-progress	6	2,060.36	1,720.16
(c) Intangible assets	7	2.93	2.09
(d) Intangible assets under development	7	8.98	1.70
(d) Financial assets			
(i) Investments	8	117.23	73.28
(ii) Loans	9	11.52	9.66
(iii) Other financial assets	10	52.33	23.58
(e) Deferred tax assets	11	-	-
(f) Other non-current assets	12	157.21	156.67
Total non-current assets		**7,770.82**	**7,251.43**
(2) Current assets			
(a) Inventories	13	261.79	227.34
(b) Financial assets			
(i) Investments	8	7.50	51.45
(ii) Trade receivables	14	158.11	118.61
(iii) Cash and cash equivalents	15	1,656.60	1,581.01
(iv) Bank balances other than (iii) above	16	579.54	711.31
(v) Loans	9	7.13	6.48
(vi) Other financial assets	10	139.97	215.50
(c) Current tax assets	17	91.95	63.82
(d) Other current assets	12	66.25	65.24
Total current assets		**2,968.84**	**3,040.76**
Total assets		**10,739.66**	**10,292.19**
Equity and liabilities			
(1) Equity			
(a) Equity share capital	18	2,895.39	2,442.78
(b) Other equity	19	471.99	216.08
Total equity		**3,367.38**	**2,658.86**
(2) Non-current liabilities			
(a) Financial liabilities			
(i) Borrowings	20	1,696.60	1,877.19
(ii) Other financial liabilities	21	116.66	84.87
(b) Provisions	22	-	-
(c) Deferred income	23	2,063.94	1,730.09
(d) Deferred Tax Liabilities	11	344.33	397.65
(e) Other non-current liabilities	24	2,349.52	2,323.40
Total non-current liabilities		**6,571.05**	**6,413.20**
(3) Current liabilities			
(a) Financial liabilities			
(i) Borrowings	20	178.43	225.69
(ii) Trade payables			
Total outstanding dues of Micro Enterprises and Small Enterprises	25	-	-
Total outstanding dues of creditors other than Micro Enterprises and Small Enterprises	25	141.16	130.47
(iii) Other financial liabilities	21	21.06	65.88
(b) Deferred income	23	140.71	427.45
(c) Other current liabilities	24	148.70	179.61
(d) Provisions	22	171.17	191.03
Total current liabilities		**801.23**	**1220.13**
Total liabilities		**7,372.28**	**7633.33**
Total equity and liabilities		**10,739.66**	**10,292.19**

The accompanying notes (1 to 44) form an integral part of the financial statements

Subject to our report of even date

for PAMS & Associates,
Chartered Accountants.
FRN:316079E

(CA Satyajit Mishra)

(Srikanta Kumar Sahoo)
Director (Finance)
DIN-05295942

(Umesh Kumar Gupta)

(Bhaskar Jyoti Sarma, IAS)
Chairman Cum Managing Director
DIN-06612462

(Prasant Kumar Das)

Power Analyst Odisha

Odisha Power Transmission Corporation Limited

(A Government of Odisha Undertaking)

Regd. Office: OPTCL Tech Tower, Saheed Nagar, Bhubaneswar - 751007

CIN : U401020RSGC007553

Statement of Profit and Loss for the year ended March 31, 2025

Amount in Rs. Crore

		Notes	Year ended 31.03.2025	Year ended 31.03.2024
I	Revenue from operations	26	1,117.59	1,048.92
II	Other income	27	281.01	249.97
III	**Total revenue (I + II)**		**1,398.60**	**1,298.89**
IV	**Expenses**			
	(a) Employee benefits expense	28	479.45	499.68
	(b) Finance costs	29	131.38	120.96
	(c) Depreciation and amortisation expense	30	409.74	406.56
	(d) Other expenses	31	216.12	198.66
	Total expenses (IV)		**1,236.69**	**1,225.86**
V	**Profit Before Tax (III - IV)**		**161.91**	**73.03**
VI	**Tax expense**			
	(1) Current Tax	32	54.42	11.29
	MAT credit receivable	32	(76.82)	-
	Tax for earlier years	32	-	5.65
	(2) Deferred tax	32	(53.39)	234.65
	Total tax expense (VI)		**(75.79)**	**251.59**
VII	**Profit/(Loss) after Tax (V - VI)**		**237.70**	**(178.56)**
VIII	**Other comprehensive income**			
	(i) Items that will not be reclassified to profit or loss			
	- Remeasurement gains / (losses) on defined benefit plans	35	0.19	(10.39)
	(ii) Income tax relating to items that will not be reclassified to profit or loss	32	(0.07)	3.63
	Total other comprehensive income for the year (VIII)		**0.12**	**(6.76)**
IX	**Total comprehensive income for the year (VII+VIII)**		**237.82**	**(185.31)**
X	**Earnings per equity share:**			
	(1) Basic	33	91.08	(81.36)
	(2) Diluted	33	91.08	(81.36)

The accompanying notes (1 to 44) form an integral part of the financial statements

Subject to our report of even date

for PAMS & Associates,
Chartered Accountants.
FRN:316079E

(CA Satyajit Mishra)
Partner
Membership No. 057393
Date: 05.06.2025

(Srikanta Kumar Sahoo)
Director (Finance)
DIN-05295942

(Umesh Kumar Gupta)
Chief Financial Officer

(Bhaskar Jyoti Sarma, IAS)
Chairman Cum Managing Director
DIN-06612462

(Prasant Kumar Das)
Company Secretary

PAMS & ASSOCIATES ★ BHUBANESWAR ★ CHARTERED ACCOUNTANTS

Odisha Power Transmission Corporation Ltd. (OPTCL) ★ JANPATH BBSR-07

NOTARY ★ GOVERNMENT OF ODISHA ★ D.S. SAMANTARAY REGD. NO.-5872012 DIST-KHURDA

Power Analyst Odisha

3.4 **Administrative & General (A&G) Cost:** The A&G Cost of the Licensee is a controllable cost whereas the learned Commission had approved for a sum of Rs. 37.05 Cr in the Transmission Tariff for FY25 against which the Licensee proposed for trued up amount of Rs. 41.60 Cr. As the A&G Cost is a controllable Cost, the excess claimed by the Licensee for Rs. 4.55 Cr in the true up table may be rejected by the learned Commission.

3.5 **Return on Equity (RoE):** The Licensee cannot be allowed RoE on Public Capital paid by Govt of Odisha from Odisha Budget. The budget money is public capital sanctioned by Govt to OPTCL since last long years. The People of Odisha cannot pay tariff on their own capital in the form of RoE. While approved RoE of Rs. 162.14 Cr for FY25, the learned Commission at Para no 293 o the TT order observed that, *"as per the Regulation 8.28 & 8.29 of OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014, return on equity shall be computed on pre-tax basis @15.50% to be grossed up as per Clause (2) of this Regulation. Accordingly, the Commission has determined the Equity capital as Rs. 1046.07 Cr (i.e., Rs.2206.10 Cr - Rs.513.03 Cr - Rs.647.00Cr) excluding the above amount from the total equity capital infused by the Govt. of Odisha and approves RoE of Rs.162.14 Cr. (against OPTCL's proposal of Rs.273.09 Cr.) for the FY 2024-25 considering RoE @15.5%."* The above order of the Commission is very much confusing because what excludes from Rs. 1046.07 Cr is not clear. But it looks like that the Commission has allowed RoE on public capital sanctioned by Govt from State budget which is very much illegal. Therefore, I urge upon the learned Commission to disallow the RoE on public capital and allow RoE only on the equity funded by loan capital.

Power Analyst Odisha

3.6 **Income Tax:** The Commission had passed out Income Tax of Rs. 7 Cr in the Transmission Tariff for FY25 against which the Licensee trued up Rs. 28.56 Cr. The excess claims of income tax may be scrutinised in the instant proceeding and against which I may suggest that the Income tax actually paid by the Licensee should be a pass through in the truing up process for FY25.

NOTARY GOVERNMENT OF ODISHA

ARR & Transmission Tariff for FY27

4. That the Licensee has proposed the summary of ARR for FY27 in the table-16 given below which I have extracted from their petition.

SUMMARY OF AGGREGATE REVENUE REQUIREMENT OF OPTCL FOR FY 2026-27

Table-16 (Cr.)

5.

ITEMS	Proposal for OPTCL FY 2026-27	
A) FIXED COST		
1. O&M Expenses		**838.47**
(i) Employees Cost including Terminal Benefits	531.52	
(ii) A&G Cost	46.95	
(iii) R&M Cost	259.65	
(iv) Expenses related to auxiliary energy consumption	0.00	
(v) Other misc. expenses, statutory levies and taxes (GCC)	0.35	
2. Interest & Financial Charges		**268.44**
(i) Interest on Loan Capital	240.91	
(ii) Interest on Working Capital	0.00	
(iii) Rebate	27.53	
3. Depreciation & Amortisation expense		**337.09**
4. Return on Equity		**279.11**
5. Income Tax		**28.56**
Sub-Total (A)		**1,751.67**
B) Others		
Incentive for system availability		**13.73**
Total Trans. Cost (A+B)		**1,765.40**
C) Less Misc. Receipts		**275.35**
D) Net ARR to be recovered from LTOA Customers i.e. **OPTCL's Aggregate Revenue Requirement**		**1,490.05**

4.1 **Proposed ARR Rs. 1490.05 Cr is very high:** That the Licensee has proposed the total ARR of Rs. 1490.05 Cr for FY27. The O&M & other cost are projected at very higher side which invites for scrutiny. I have verified the Depreciation allowance, R&M Cost, A&G Cost, RoE & Income Tax and found various anomalies in view of the Transmission Tariff regulations notified by OERC. My observations on above anomalies submitted on previous para is restored herewith and submits the same once again before the learned Commission for consideration in the process of approval of ARR and determination of transmission tariff for FY27. I do hope the learned Commission will be

kind enough & professional to pass through our public comments in the ongoing proceeding for approval of the ARR and determination of Transmission Charges/Tariff for the ensuing FY27. Time arrives in the part of the learned Commission to initiate necessary action so as to promote professionalism in the functioning of the Public Enterprises starting from the Petitioner OPTCL, GRIDCO, OHPC, OPGC to Private Enterprises TP DISCOMs in which Govt of Odisha have 49% shareholding. The Tariff Petitions submitted by the above named Public Enterprises lacks professionalism in the field of Engineering, Accountancy, Economics and Law as described by us in these public comments. Professionalism cannot be mischievous and carelessness, or else that's not professionalism. Professionalism believes mutual cooperation and growth; can be ensured by discharging the duties in a careful manner without leaving any anomalies.

4.2 **Non-Tariff Income:** The Non-Tariff Income (NTI) of the Utility will be doubled than the projection made by the Licensee. The Licensee has projected the NTI in the table-15 below which is extracted from the Petition of the Licensee for the ready reference of the Commission. The inter-State Transmission charges is taken lower side in respect to the grid uses for the purpose. The short-term and medium-term open access charges are bracketed under NTI, whereas medium-term open access income is nil and short-term open access charges will increase further. Income from investment is estimated Rs. 20 Cr only, whereas OPTCL Balance Sheets speaks about huge cash, bank and investment balance of Rs. 2353.37 Cr. The total non-tariff income trued up for Rs 347.51 Cr for FY25 whereas instead of increase, the Licensee has proposed on Rs 275.35 Cr only.

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Table-15

Source	□ Cr.
Inter-State Transmission charges	8.14
Short-Term Open Access Charges	195.73
Bank Interest	20.00
Scrap Sale	5.00
Income from Lease rent (Optical Fibre)	16.48
Supervision Charges	20.00
Other Misc. Receipts	10.00
Total	**275.35 r.**

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4.3 **Revenue Gaps:** By increasing the ARR to a higher level with several anomalies, the Licensee says that the existing transmission tariff of 25.50 P/U is not capable to earn required revenue from TP DISCOMs, LTOA Consumers and NTI. The table-17 & 18 given below is cited by the Licensee, speaks deficit revenue of Rs. 423.04 Cr deficit at existing tariff. The high negative gap of Rs 423.04 Cr has occurred due to under casting of the proposed total power transmission in the State grid. It is surprised to note that, the Licensee has proposed total power transmission of 41849.28 MU only for FY27 whereas with equivalent 220 KV & 132 KV lines, the Andhra Pradesh Transmission Licensee is transmitting double the units (MU) than Odisha. On this issue, I have a detailed elaboration later on, may be viewed please. GRIDCO's Bulk Price Petition speaks that a sum total 46334.13 MU will be traded during ensuing FY27. The high revenue gap proposed by the Petitioner is fictitious with reference to our citation earlier and unsustainable because the instant proceeding cannot pass out the inefficiencies and non-performances of the STU. Therefore, I urge upon the learned Commission to pass out an order to scrutinise the proposal of the licensee in the process of determination of transmission tariff for FY27.

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Table-17

Particular	Commission's approval (FY 2025-26)	MU projection for FY 2026-27	Amount (Cr.)
TPCODL	13823.00	13248.00	
TPNODL	8719.00	8853.46	
TPWODL	12378.00	11952.00	
TPSODL	5062.00	5050.00	
Discom total	**39982.00**	**39103.46**	
Less: Drawal in 33kV & 11kV network	440	440.00	
Energy transmitted for DISCOM (5-6)	39542.00	**38663.46**	985.92

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Add: Transmission of power through Open access to industries from CGPs and Emergency/Backup sale to CGPs/Industries 1. Nalco (Contracted-10MW: 87.60MU + Emergency sale: 60MU) = 147.60MU 2. IMFA (Contracted-41.09MW: 360MU + Emergency sale: 20MU) = 380MU 3. JSL (Contracted-150MW: 1314MU)= 1314MU 4. BEL (Energy Projection) = 9.45MU 5. ABReL SPL (Energy projection) = 27.28MU 6. ABReL SPV (Energy projection) = 25.03MU 7. MCL (Energy projection) = 111MU 8. TSL (Energy projection,GNA) = 839.38MU 9. Hindalco (Energy projection, GNA) = 262.8MU 10. AMPIN (Energy projection) = 69.276MU	686.89	3185.82	81.24
Total	**40228.89**	**41849.28**	**1067.16**

Table-18

Deficit of Revenue Requirement as per existing transmission tariff @ 25.50 p/u (Cr.)	
Total Aggregate Revenue Requirement	**1,490.05**
Less: Revenue earned from Long Term Open Access Customer	**1,067.01**
Deficit of Revenue Requirement for FY 2026-27 at the existing rate @ 25.50 p/u	**- 423.04**

4.4 **Transmission Tariff:** In the table-19 given below, the licensee has proposed to increase the transmission tariff to 35.61 P/U. That means, the existing tariff of 25.50 P/U will be increased by 10.11 P/U, i.e, by 40% for the ensuing FY27. Is it not a mindless approach in the part of the State Public Enterprise OPTCL to project for 40% hike of tariff? Who cares which duty? The proposal of the Transmission licensee is unsustainable, hence needs to be dismissed.

Table-19

Abstract of Open Access Charges Proposed By OPTCL for FY 2026-27	
DETAILS	**In Per Unit approach**

Net Aggregate Revenue Requirement (Cr.)	**1,490.05**
Proposed Energy to be transmitted in OPTCL Network (MU)	**41,849.28**
Power Flow (Equivalent of **41,849.28**) in MWs	**4777.31**
Proposed Transmission Tariff (Rs./MW-Day)	**8545.00**
Proposed Transmission Charges (Paise/unit)	**35.61**

5 **Compliance to the queries on levy of GSC by OERC:** That the Applicant has filed an Application (Case No 44 of 2024) before Ld OERC on 26.06.2024 for determination and approval for levy of Grid Support Charges for industries having Captive Generating / Cogeneration plants and running in parallel with the Grids of OPTCL subsequent to order dated 06.07.2023 of Hon'ble Orissa High Court in W.P(C) No-2220 of 2021 & W.P(C) No-16513 of 2021 filed by M/s Vedanta Limited and M/s CCPPO Odisha respectively. The Learned Commission has initiated proceeding in case no 44/2024 & passed an interim order dated 09.07.2024 in which the Applicant was directed to submit a consolidated report on certain queries. The Applicant filed the compliance report on dt 29.01.2025 to the queries of the Commission. Since then the matter is pending before the learned Commission without any order. In the meantime one year elapsed and the esteemed Consumers of Odisha will now pay for the high tariff due to delayed decision making by the Regulatory Body. Therefore, I hereby urge upon the learned Commission to initiate necessary action to dispose of the case no 44/2024 and allow the Applicant to recover the unrecovered revenue by levying GSC or transmission charge on the CGPs & IPPs of Odisha and passed on the same to the end users resulting further reduction in transmission tariff.

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6 **Compliance to the Directions of OERC:** Learned OERC had given many directions to the Petitioner in the last transmission tariff order for FY26 for compliance by the Petitioner. The Stakeholders are party to the instant proceeding because the tariff petitions are being disposed of through public consultation process by OERC under section 64 of the Act. The compliance to the directions of the Learned Commission given to the Licensee at para 260 (a) to (j) of the Transmission Tariff order for FY26 is not spelt out by the Petitioner. The Stakeholders don't know about the compliances to the directions given by the Learned Commission. Whether the Licensee complies or not is not known to anybody. Therefore, I hereby urge upon the learned Commission to pass an order to record

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the compliances of the Licensee wrt the directions given by the Commission in the Transmission Tariff order for FY27.

7 **Violation of the first tariff principle of section 61(a) of the Act:** It is clearly mentioned in Section 61(a) of the Act that, OERC is guided by the principles and methodologies specified by the Central Commission for determination of the tariff applicable to generating companies and transmission licensees. But OERC did not follow the method regulated by the Central Commission till date. There is huge gap persists between the methods adopted by CERC and OERC so far as the Transmission Tariff, Open Access & Load Despatch Regulations are concerned. OERC still follows the obsolete Postage Stamp Method but CERC adopts POC Method since last decade and accordingly notified regulations. But in Odisha, nothing changed observed during last 15 years regulations. Therefore, I may urge upon the learned Commission to pass an order to adopt the methods followed by Central Commission for determining transmission charges in the interest of State Electricity Industry and people at large.

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8 **OERC & GRIDCO are under an obligation to look up the economic growth of the State:** That the learned Commission (OERC) is under an obligation to follow the nine guiding principles provided in section 61 of the Electricity Act, 2003 while determining the tariff. Out of the nine principles, one principle provided in section 61(i) is that, the SERCs including OERC shall, subject to the provisions of the Act, specify the terms and conditions for determination of tariff, and in doing so, shall be guided by the National Electricity Policy (NEP) and National Tariff Policy (NTP). As per the provisions of NEP & NTP, the learned Commission shall recognise rapid economic development of the State and the country while conducting proceeding to determine tariff for sale & purchase of electricity.

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8.1 **Functions of the State Commission:** Section 86 of the Electricity Act, 2003 stipulates various functions of OERC. Among other functions, section 86(4) again reminds that, in discharge of its functions, the State Commission shall be guided by the National Electricity Policy, National Electricity Plan and national tariff Policy published under section 3 of the Act. Similarly, various judgements of Hon'ble APTEL and Supreme Court of India hold up the above central policies while in the functions and proceedings of the State Commission u/s 86 of the Act. The judicial & quasi-

judicial judgements say that the State Commission is an independent body & acts as per won conscience within the purview of NEP & NTP. While the Commission acts beyond the purview of central policies NEP & NTP, then the learned Commission will cite necessary reasons in support of the decision and justify the same. Therefore, the State Regulatory Commissions are no longer mere tariff-setting bodies; they are institutional arbiters of economic growth and social justice in power sector. In the above backdrop, it is necessary to cite the relevant provisions of NEP & NTP recognising rapid economic development in the tariff setting functions of the State Commission as under:

8.2 National Electricity Policy (NEP), 2005: That The Clause no. 1.2 of the NEP notified by Central Govt on 12th February, 2005 clearly states that "Electricity is an essential requirement for all facets of our life. It has been recognized as a basic human need. **It is a critical infrastructure on which the socio-economic development of the country depends.** Supply of electricity at reasonable rate to rural India is essential for its overall development. Equally important is availability of reliable and quality power at competitive rates to Indian industry to make it globally competitive and to enable it to exploit the tremendous potential of employment generation. Services sector has made significant contribution to the growth of our economy. Availability of quality supply of electricity is very crucial to sustained growth of this segment." The aforesaid clause recognises the crucial role of electricity supply & tariff in the economic development of the State and the Country. The fact to note is that the tariff, supply of electricity and economic development stated in the above clause relates to the functions of SERCs in view of section 86 of the Act. Further the Clause **no. 1.3 of NEP states that the Central Govt recognised electricity as one of the key drivers for rapid economic growth and poverty alleviation.** If this is the fact as stated in aforesaid clause, then why not the State Govt of Odisha recognises the same? The laws of electricity makes the national policies of electricity mandatory for State Govt and those prevails over the proceedings conducted by OERC. It is a very sorry state of affair that the learned Commission does not pay desired attention to the above policies resulted Odisha Tariff & Supply of Electricity become uncompetitive. The cost of violation of central policies of electricity by OERC imposed on the economy of Odisha for the pace of development of the State victimised. Therefore, I hereby urge upon the learned Commission to consider my

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above submission in the instant proceeding so as to bailout the economic development of Odisha.

8.3 **National Tariff Policy (NTP), 2016:** Similarly, **clause no. 1.2 of the NTP, 2016** says that, the NEP, 2005 has set the goal of adding new generation capacity and **enhancing per capita availability of electricity per year** and to not only eliminate energy and peaking shortages but to also have a spinning reserve as specified by the Central Electricity Authority. Development of the power sector has also to meet the challenge of providing access for affordable electricity to all households. **The clause no. 1.3 further states that**, it is equally necessary to ensure availability of electricity to different categories of consumers at reasonable rates for achieving the objectives of rapid economic development of the country and improvement in the living standards of the people. The aforesaid two clauses of NTP require SERCs to determine affordable tariff so as to improve the consumption of electricity and Per Capita Power Consumption of the State but it is misconceived by OERC. The learned Commission does not pay desired attention for calculation of Per Capita Power consumption of Odisha in the Tariff proceedings and this a sheer violation of national policies of electricity. Therefore, I may urge upon the learned Commission to consider the above submission and initiate necessary action for determination of the Per Capita Power Consumption of Odisha for previous year, FY25.

8.4 **Article of Shri Kulamani Biswal, Ex-Director(F), NTPC Ltd:** The implication of aforesaid nation policies on the regulations of electricity enacted by SERCs & CERC is well edited by my learned elder Brother Shri Kulamani Biswal, Ex-Director OERC, Ex-Chief Tariff CERC, Ex-Director(F) MCL and Ex-Director(F) NTPC Ltd. Shri Biswal justifies the crucial roles of national electricity & tariff policies in the proceedings carried out by OERC by citing various case laws. The learned OERC cannot ignore the guidelines of national policies with respect to rapid economic development in view of section 86(4) of the Act. Therefore, I think it proper to cite below aforesaid odia article for ready reference of the learned Commission as under:

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ବିଦ୍ୟୁତ ନିୟାମକ ଆୟୋଗ ଉପରେ ଏନଇପି ଓ ଏନଟିପିର ଆଇନଗତ ପ୍ରଭାବ ସେଗୁଡ଼ିକ ବାଧତାମୂଳକ କି ?

ବିଦ୍ୟୁତ ଆଇନ, ୨୦୦୩ ଭାରତର ବିଦ୍ୟୁତ କ୍ଷେତ୍ରରେ ଏକ ମୌଳିକ ପରିବର୍ତ୍ତନ ଆଣିଥିଲା। ଏହି ଆଇନ ମାଧ୍ୟମରେ ସ୍ୱାଧୀନ ବିଦ୍ୟୁତ ନିୟାମକ ଆୟୋଗଗୁଡ଼ିକର ସୃଷ୍ଟି, ପ୍ରତିସ୍ପର୍ଦ୍ଧା ପ୍ରୋତ୍ସାହନ, ଉପଭୋକ୍ତା ସ୍ୱାର୍ଥର ସୁରକ୍ଷା ଓ ବିଦ୍ୟୁତ କ୍ଷେତ୍ରର ଅଭିବୃଦ୍ଧି ସୁନିଶ୍ଚିତ କରାଯାଇଥିଲା । ଏହି ଉଦ୍ଦେଶ୍ୟଗୁଡ଼ିକୁ ପୂରଣ କରିବା ପାଇଁ ଆଇନ ଦ୍ୱାରା ସରକାରଙ୍କୁ ପ୍ରତିଟି ଗୁରୁତ୍ୱପୂର୍ଣ୍ଣ ନୀତି ଜାତୀୟ ବିଦ୍ୟୁତ ନୀତି (ଏନଇପି) ଓ ଜାତୀୟ ଟାରିଫ ନୀତି (ଏନଟିପି)ପ୍ରସ୍ତୁତ କରିବାକୁ ଅଧିକାର ଦେଇଛି । ବିଭିନ୍ନ କ୍ଷମତାବଳ ଓ ଅତିରିକ୍ତ ବିଦ୍ୟୁତ୍ସଂଯୋଗ ଉପଲବ୍ଧତା ପ୍ରଭୃତି ହେଉଛି ଏହି ନୀତିଗୁଡ଼ିକ ବିଦ୍ୟୁତ ନିୟାମକ ଆୟୋଗଗୁଡ଼ିକ ଉପରେ ବାଧତାମୂଳକ କି, ନା କେବଳ ମାର୍ଗଦର୍ଶକ ସୂତ୍ରପାତ ?

ଆଇନଗତ ଢାଞ୍ଚା: ଜାତୀୟ ବିଦ୍ୟୁତ ନୀତି ଓ ଜାତୀୟ ଟାରିଫ ନୀତିର ଆଇନଗତ ଆଧାର ବିଦ୍ୟୁତ ଆଇନ, ୨୦୦୩ରେ ନିହିତ ଥିବା ୩ କେନ୍ଦ୍ର ସରକାରଙ୍କୁ ରାଜ୍ୟ ସରକାର ଓ କେନ୍ଦ୍ରୀୟ ବିଦ୍ୟୁତ ଉତ୍ପାଦନ ସହ ପରାମର୍ଶ କରି ଏନଇପି ଓ ଏନଟିପି ପ୍ରୋତ୍ସାହନ କରିବାକୁ ଅଧିକାର ଦିଏ । ଧାରା ୬୧ ଜାତିସଂଘ ନିର୍ଦ୍ଦେଶନାମାରେ ଉପଯୁକ୍ତ ନିୟାମକ ଆୟୋଗ "ଜାତୀୟ ବିଦ୍ୟୁତ ନୀତି ଓ ଟାରିଫ ନୀତି ପ୍ରତି ନିର୍ଦ୍ଦେଶିତ ହେବ" ବୋଲି କହିଛି । ଧାରା ୬୧ (i) କେନ୍ଦ୍ରୀୟ ଓ ରାଜ୍ୟ ନିୟାମକ ଆୟୋଗଗୁଡ଼ିକୁ ସ୍ୱାଧୀନ ନିୟାମକ ଶକ୍ତି ପ୍ରଦାନ କରିଥାଏ। ଭାରତର ସୁପ୍ରିମକୋର୍ଟ ଓ ବିଦ୍ୟୁତ ଅପିଲ ଟ୍ରିବ୍ୟୁନାଲ ଏହା ସ୍ପଷ୍ଟ କରିଛନ୍ତି ଯେ ଏନଇପି ଓ ଏନଟିପି ନୀତି ଦର୍ଶିକା, ସେଗୁଡ଼ିକ ଆଇନ ଭିତ୍ତି ଉପ-ଆଇନ ନୁହେଁ। ଫଳରେ ଜାତିସଂଘ ଜଳବାୟୁ ପରିବର୍ତ୍ତନ ସମ୍ମିଳନୀ (୨୦୧୦) ମାଧ୍ୟମରେ ସୁପ୍ରିମକୋର୍ଟ ରହିଥିବେ ଯେ, ନୀତି ନିର୍ଦ୍ଦେଶ ଦ୍ୱାରା ନିୟାମକ ଆୟୋଗର ଆଇନଗତ ଶକ୍ତି ଖର୍ବ କରାଯାଇପାରିବ ନାହିଁ । ଟାରିଫ ନିର୍ଦ୍ଧାରଣରେ ଶକ୍ତି ସିଧାସଳଖ ଭାବେ ଆଇନରୁ ଆସେ, ନୀତିରୁ ନୁହେଁ। ଏତିକିରେ ନୁହେଁ ରହିଛି ଯେ, ଏନଇପି ଓ ଏନଟିପି ମାର୍ଗଦର୍ଶକ ମାତ୍ର, ଏହା ନିୟାମକ ଆୟୋଗର ସ୍ୱାଧୀନ ନିଷ୍ପତ୍ତିକୁ ବାଧା ଦେଇପାରେ ନାହିଁ ।

ବାଧତାର ସୀମା : ନିତାର ଓ ଜାତୀୟ ଟେବାର ଉଦ୍ଦେଶ୍ୟ ରହିଛି ଓ ଏନଇପି ଓ ଏନଟିପି ପୂର୍ଣ୍ଣ ଭାବେ ବାଧତାମୂଳକ ନୁହେଁ, ତଥାପି ସେଗୁଡ଼ିକର ବହୁତ ଉଚ୍ଚ ପ୍ରେରଣାମୂଳକ ମୂଲ୍ୟ ରହିଛି । ନ୍ୟାୟାଳୟଗୁଡ଼ିକ କହିଛନ୍ତି ଯେ, ନିୟାମକ ଆୟୋଗଏହି ନୀତିଗୁଡ଼ିକୁ ଅନୁସରଣ କରିପାରିବ ନାହିଁ, ଏବଂ ଯଦି ଏହାଠାରୁ ଅଲଗା ନିଷ୍ପତ୍ତି ନେଉଛି, ତେବେ ଯୁକ୍ତିସଂଗତ କାରଣ ଦେଖାଇବା ଆବଶ୍ୟକ। ଏତେଟି ସୁପ୍ରିମକୋର୍ଟ ଜଜମେଣ୍ଟ ସିରାଆରଟି (୨୦୧୨) ମାମଲାରେ ସୁପ୍ରିମକୋର୍ଟ କହିଥିଲେ ଯେ, ନୀତିଗୁଡ଼ିକ ନିୟାମକ ଶକ୍ତି ବ୍ୟବହାରରେ ଏକ ଗୁରୁତ୍ୱପୂର୍ଣ୍ଣ ସୂଚନା । ରାଜ୍ୟ ସରକାର ନିୟାମକ ଆୟୋଗକୁ ଟାରିଫ ନିର୍ଦ୍ଦେଶ ଦେଇପାରିବେ । କିନ୍ତୁ ନ୍ୟାୟାଳୟଗୁଡ଼ିକ ସ୍ପଷ୍ଟ କରିଛନ୍ତି ଯେ, ଏହି ନିର୍ଦ୍ଦେଶଗୁଡ଼ିକ ଟାରିଫ ନିର୍ଦ୍ଧାରଣରେ ହସ୍ତକ୍ଷେପ କରିପାରିବ ନାହିଁ। ନିୟାମକ ଆୟୋଗର ସ୍ୱାଧୀନତା ବିଦ୍ୟୁତ ଆଇନର ମୌଳିକ ଲକ୍ଷଣ।

ବ୍ୟବହାରିକ ପ୍ରଭାବ: ବାସ୍ତବରେ ଏନଇପି ଓ ଏନଟିପି ଟାରିଫ ଘଟଣ ଓ ଦୂର ସଦୃଶତି ମଧ୍ୟରେ ସନ୍ତୁଳନ ରକ୍ଷି ଦୂର ପାଇନ୍ଥାଏ.

କୁଳମଣି ବିଶ୍ୱାଳ
ଶକ୍ତି ବିଶେଷଜ୍ଞ

ଓପର ଆଇସେଣ୍ଟ ଓ ପ୍ରତିସ୍ପର୍ଦ୍ଧା ପ୍ରୋତ୍ସାହନରୁ ବ୍ୟବହାର, ଉପଭୋକ୍ତା ସ୍ୱାର୍ଥ ଓ ବିଦ୍ୟୁତ କ୍ଷମତାର ଆର୍ଥିକ ସୁସ୍ଥତି ଆଦି କ୍ଷେତ୍ରଗୁଡ଼ିକୁ ଉଚ୍ଚତା ଭାବେ ପ୍ରଭାବିତ କରେ। ଜାତୀୟ ବିଦ୍ୟୁତ ନୀତି ଓ ଜାତୀୟ ଟାରିଫ ନୀତି ଆଇନଗତ ଭାବେ ଶ'ପୂର୍ଣ୍ଣ ବାଧତାମୂଳକ ନୁହେଁ। ସେଗୁଡ଼ିକ ବିଦ୍ୟୁତ ଆଇନ, ୨୦୦୩ କୁ ଅତିକ୍ରମ କରିପାରେ ନାହିଁ, କିମ୍ବା ନିୟାମକ ଆୟୋଗର ସ୍ୱାଧୀନ ଶକ୍ତିକୁ ସୀମିତ କରିପାରେନାହିଁ । ତଥାପି, ସେଗୁଡ଼ିକ ଆଇନଗତ ଭାବେ ଗୁରୁତ୍ୱପୂର୍ଣ୍ଣ ମାର୍ଗଦର୍ଶକ ଓ ନିୟାମକ ଆୟୋଗ ସେଗୁଡ଼ିକୁ ବିଚାର କରିବାକୁ ବାଧ୍ୟ । ଏହାଠାରୁ ଅଲଗା ନିଷ୍ପତ୍ତି ନେଲେ, ସେମାନଙ୍କୁ ଯୁକ୍ତିସଂଗତ କାରଣ ଦେଖାଇବା ଆବଶ୍ୟକ। ଏଣୁ, ଜାତୀୟ ବିଦ୍ୟୁତ ନ୍ୟାୟାଳୟ ଏନଇପି ଓ ଏନଟିପିକୁ "ଆଇନରେ ବାଧତାମୂଳକ, କିନ୍ତୁ ପ୍ରୟୋଗକ୍ଷେତ୍ରରେ ନମନୀୟତା ଭାବରେ ଗ୍ରହଣ କରିଛି । ଯଦି ନିୟାମକ ଆୟୋଗ ଏନଇପି ଓ ଏନଟିପି ଠାରୁ ଭିନ୍ନ ମତ ପୋଷଣ କରନ୍ତି ତାକୁ ଉପଯୁକ୍ତ କାରଣ ଦର୍ଶାଇବାକୁ ପଡିବ। ନଚେତ, ଉପର ଅଦାଲତରେ ତାହା ଖରା ସିଧାରେ ବହୁତ ସମାଲୋଚନା ହୋଇଛି ।

8.5 Per Capita Power Consumption of the State for FY25:

The combine reading of Section 61(i) of the Electricity Act, 2003 and the clause nos 1.2 & 1.3 of both the NEP & NTP establishes the fact that the State Commission OERC is under an obligation to recognise electricity as one of the key drivers for rapid economic growth and poverty alleviation of the State & Country. On this backdrop, the State Commission is required to assess the pace of economic development of the State and by doing so it is necessary in the part of OERC to calculate the Per Capita Power Consumption of the State. Without the determination of Per Capita Power Consumption of the State, OERC cannot recognise the key role of electricity in the rapid economic development of the State. In order to increase the Per Capita Power consumption of the State, it is necessary in the part of OERC to make tariff affordable as said by national policy. The Policy directives given under clause no 1.2 & 1.3 of both the NEP & NTP are not only binding to Central Govt, CEA and CERC but also binding for State Govt and SERCs as well as Govt of Odisha and OERC. Therefore, I hereby urge upon the learned Commission to pass an order to recognise electricity as one of the key drivers of rapid economic development and basing on which further pass an order for determination of the Per Capita Power Consumption of the State Odisha for previous FY25.

Power Analyst Odisha

NOTARY GOVERNMENT OF ODISHA
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8.6 **Reply of State Govt on the floor of last Session of Assembly:** I become surprised to read the reply of the Hon'ble Minister, Dept of Energy, Govt of Odisha on the floor of the last winter session of the Odisha Legislative Assembly on dt 03.12.2025 against the unstarred question no. 1202 by Hon'ble MLA, Chitrakonda Shri Mangu Khil. The reply of Govt is given below for the ready reference of the learned Commission. The State Govt replies that ***"there is no special provision in the Electricity Act, 2003 for the economic development of the State. Hon'ble OERC acts as per Section 61 to 66 of the Act while determining tariff in which the ARR of the DISCOMs are recovered from Consumers. The DISCOMs are functioning like commercial organisations. The increase of Per Capita Power Consumption of the State depends on the policy decision taken up by the Govt in which the State Commission is least concerned."*** In the above reply, the State Govt sets aside the provision of section 61(i) & 86(4) of the Act as stated in previous para. The fundamental principle of tariff setting is scrapped out by the State Govt in the above reply. The reply of Govt is unsustainable. Therefore, I urge upon the learned Commission to pass an order to recognise the vital role of tariff setting in the rapid economic development of the State.

Power Analyst Odisha

NOTARY GOVERNMENT OF ODISHA

୦୩.୧୨.୨୦୨୫

ବକେୟା ବିଦ୍ୟୁତ ବିଲ ଛାଡ

ଅଣତାରକା ପ୍ରଶ୍ନ ସଂଖ୍ୟା ୧୨୦୨. ଶ୍ରୀ ମଙ୍ଗୁ ଖିଲ: ଉପ ମୁଖ୍ୟମନ୍ତ୍ରୀ ଅନୁଗ୍ରହ କରି କହିବେ କି – କ) ରାଜ୍ୟର ଅର୍ଥନୈତିକ ବିକାଶ ପାଇଁ ରାଜ୍ୟ ବିଦ୍ୟୁତ ନିୟାମକ ଆୟୋଗ କାର୍ଯ୍ୟକରିବା ପାଇଁ ବିଦ୍ୟୁତ ଆଇନ ୨୦୦୩ରେ ନିର୍ଦ୍ଦେଶ ରହିଛି, ରାଜ୍ୟର ମୁଣ୍ଡ ପିଛା ହାରାହାରି ବିଦ୍ୟୁତ ବ୍ୟବହାର (ୟୁନିଟ) ପରିମାଣ ରାଜ୍ୟର ଅର୍ଥନୈତିକ ବିକାଶର ଶ କରି ସରକାର ଓଇଆରସିକୁ ନି ହୋଇଥିବାବେଳେ ଓଇଆରସି ଏହାକୁ ନିର୍ଣ୍ଣୟ କରିଛନ୍ତି କି, (ଖ) ଓଡିଶା କ୍ରୀଡ ସହିତ ପ୍ରତ୍ୟକ୍ଷ କିମ୍ବା ପରୋକ୍ଷ ଭାବେ କେତେ ଉତ୍ପାଦନ କ୍ଷମତାର (ମେଗାୱାଟ) ବିଦ୍ୟୁତ ଉତ୍ପାଦନ କମ୍ପାନୀମାନେ ପ୍ରତିଷ୍ଠା କରିଥିବା ନିଜସ୍ୱ ବିଦ୍ୟୁତ କେନ୍ଦ୍ର, ସ୍ୱାଧୀନ ବିଦ୍ୟୁତ କେନ୍ଦ୍ର ଏବଂ କେନ୍ଦ୍ର ଓ ରାଜ୍ୟ ସରକାର ପ୍ରତିଷ୍ଠା କରିଥିବା ବିଦ୍ୟୁତକେନ୍ଦ୍ର ସଂଯୋଗ ହୋଇଛି ତାହାର ସବିଶେଷ ତଥ୍ୟ ପ୍ରଦାନ କରିବେ କି, ଏସ୍. ଏଲ. ଡି. ସି ନିୟନ୍ତ୍ରଣ କରୁଥିବା ରାଜ୍ୟ ଗ୍ରୀଡରେ ସମସ୍ତ ଉତ୍ପାଦନ କମ୍ପାନୀମାନଙ୍କର ବାର୍ଷିକ କେତେ ପରିବହନ ହେଉଛି ଗତ ବର୍ଷ ତଥ୍ୟ ପ୍ରଦାନ କରିବେ କି, ଚିତ୍ରକୋଣ୍ଡା ନିର୍ବାଚନ ମଣ୍ଡଳୀ ଅନ୍ତରଗତ ବିଦ୍ୟୁତ୍ ଉପଭୋକ୍ତାଙ୍କ ବକେୟା ବିଲ ଛାଡ କରିବା ପାଇଁ ପଦକ୍ଷେପ ନେବେ କି ?

ଉତ୍ତର

ଶ୍ରୀ କନକ ବର୍ଦ୍ଧନ ସିଂହ ଦେଓ, ଉପ ମୁଖ୍ୟମନ୍ତ୍ରୀ (ଶକ୍ତି):-

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(କ) ରାଜ୍ୟର ଅର୍ଥନୈତିକ ବିକାଶ ପାଇଁ ବିଦ୍ୟୁତ ଆଇନ, ୨୦୦୩ ରେ କୌଣସି ସ୍ୱତନ୍ତ୍ର ବ୍ୟବସ୍ଥା ନାହିଁ । ମାନ୍ୟବର ଓଡିଶା ବିଦ୍ୟୁତ ନିୟାମକ ଆୟୋଗ ବିଦ୍ୟୁତ ଶୁଳ୍କ ଧାର୍ଯ୍ୟ କଲାବେଳେ ଆଇନ ର ଧାରା ୬୧ ରୁ ଧାରା ୬୬ ପର୍ଯ୍ୟନ୍ତ ଦିଆଯାଇଥିବା ନିର୍ଦ୍ଦେଶ ଅନୁଯାୟୀ କାର୍ଯ୍ୟ କରିଥାନ୍ତି । ଏଥିରେ ବିଦ୍ୟୁତ ବିତରଣ ର ଖର୍ଚ୍ଚ ଉପଭୋକ୍ତା ମାନଙ୍କ ଠାରୁ ଆଦାୟ କରିବାର ବ୍ୟବସ୍ଥା ରହିଅଛି । ବିଦ୍ୟୁତ ବିତରଣକାରୀ ସଂସ୍ଥା ଗୁଡିକ ବାଣିଜ୍ୟିକ ସଂସ୍ଥା ରୂପେ କାର୍ଯ୍ୟ କରିଥାନ୍ତି । ରାଜ୍ୟର ମୁଣ୍ଡପିଛା ବିଦ୍ୟୁତ ବ୍ୟବହାରରେ ବୃଦ୍ଧି ରାଜ୍ୟ ସରକାରଙ୍କ ନୀତି ଉପରେ ନିର୍ଭର କରିଥାଏ । ଏହା ସହିତ ମାନ୍ୟବର ଆୟୋଗଙ୍କ କୌଣସି ସମ୍ପର୍କ ନାହିଁ ।

(ଖ) ଗ୍ରୀଡ଼କୋ ରାଜ୍ୟର ବିଦ୍ୟୁତ୍ ଚାହିଦା ମେଣ୍ଟାଇବା ପାଇଁ ଅନେକ ଉତ୍ପାଦନକାରୀ ସଂସ୍ଥା ମାନଙ୍କ ସହିତ ଚୁକ୍ତି ସ୍ୱାକ୍ଷର କରିଅଛି । ଏହି ଉତ୍ପାଦନକାରୀ ସଂସ୍ଥା ଗୁଡିକ ନିଜର ଉତ୍ପାଦନ କ୍ଷମତାର କିଛି ଅଂଶ ଓଡିଶା ଗ୍ରୀଡ ମାଧ୍ୟମରେ ଗ୍ରୀଡ଼କୋ କୁ ବିକ୍ରୟ କରୁଛନ୍ତି । ଏହି ସମ୍ବନ୍ଧୀୟ ତଥ୍ୟ ପରିଶିଷ୍ଟ 'କ' ରେ ପ୍ରଦାନ କରାଯାଇଅଛି।

ମାନ୍ୟବର ଓଡିଶା ବିଦ୍ୟୁତ ନିୟାମକ ଆୟୋଗଙ୍କ ବର୍ତ୍ତମାନର ଶୁଳ୍କ ଆଦେଶ ଅନୁଯାୟୀ ଚିତ୍ରକୋଣ୍ଡା ନିର୍ବାଚନ ମଣ୍ଡଳୀର ହିତାଧିକାରୀଙ୍କ ପାଇଁ ବକେୟା ବିଦ୍ୟୁତ ଛାଡ କରିବାର କୌଣସି ବ୍ୟବସ୍ଥା ନାହିଁ ।

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9 **Why Andhra is more developed than Odisha? :** That Andhra Pradesh (AP) & Odisha are neighbouring States. The Population & Territory of AP & Odisha are more or

less equal. The population of AP stands at 53 millions whereas Odisha Population is 46 Millions. The territory of AP is 162975 Sq Km whereas Odisha territory is 155707 Sq Km. If the Population and Territory of both the States are at par, then why does AP more develop? The answer to the above billion dollars question lies in electricity services provided by AP. The fact is that the Line networks and the Quality of power supply thereof of any State are directly depended on the population and territory of the State. The huge length of Line Networks, high quality engineering, high capacity of Transformers and the last but not least high Consumer base of AP makes AP more economically developed than Odisha. The quality of power supply of AP is much better than Odisha. The latest report published by APERC states that the SAIDI of APEPDCL for FY24 stands at 8.47 Hour and SAIFI stands at 20 times. We have seen in the past, i.e., 40 years back that People of AP were coming to Odisha in search of livelihood but now after 40 years, the situation is dramatically changed. Odisha People are going to AP for search of livelihood (DADANA LABOUR) and Odisha is depended on AP for supply of food grains, eggs, fish etc. This shows that AP has achieved significant economic development during last 40 years but Odisha is still at the bottom of the table of development. A simple question is arising now is, how did the economic situation of AP is dramatically change over last 4 decades? The answer to the above billion dollars question lies in the line networks, capacity of transformers, consumer base and quality of power supply as given under.

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9.1 **CEA's All India Electricity Statistics Report 2024:** The Chapter-8 of the Report titled All India Electricity Statistics for FY23 published by Central Electricity Authority (CEA) in 2024 deals in 'Electricity Transmission & Distribution System' and Chapter-9 deals in 'Electricity Utilisation'. I have consolidated some data of above two chapters in the table-3 given below. In the Chapter-8, there are two tables given state-wise and region-wise whereas central sector is stated separately. The Table no 8.1 depicts length of Line networks and Table no. 8.2 shows the capacity of Transformers. Similarly, in the Chapter-9, there are ten tables out of which I have taken Table no. 9.7 deals in Per Capita Ultimate Consumption of Electricity and Table no. 9.9 that deals in Annual Per Capita Consumption of Electricity. In the table-4 given below, I have extracted relevant data from aforesaid four tables of Chapter-8 & 9 relating to Area, Population, Line networks, Transformers, Consumers and Consumption for the State AP, Odisha, Central sector and all India total. I urge upon the leaned Commission to view the tabled data and assess AP's successful story on supply of quality & reliable

power to their 20 million Consumers and rapid economic development in comparison to Odisha. My observations on the issue are given under the table:

TABLE-4

Area, Population, Line Networks, Consumers & Per Capita Consumption of Odisha Verus Andhra Pradesh & All India					
Sl No	Particulars	Andhra Pradesh	Odisha	Central Sector	India Total
1	400 KV Line (Ckt Km)	5604	2800	109942	197726
2	220 KV Line (Ckt Km)	12525	12878	16121	193198
3	132 KV Line (Ckt Km)	13878	11996	7558	195160
4	33 KV Line (Ckt Km)	29540	16515	1647	431821
5	11 KV Line (Ckt Km)	274939	175122	65	4796846
6	LT Line (Ckt Km)	332860	223308	55	8180237
7	Total Line (Ckt Km)	691684	442923	191117	14423639
8	Step Up Transformers-SUT (Nos)	299	963	1372	6484
9	Step Up Transformers (MVA)	17252	10375	132353	376579
10	**Average Capacity of SUT (MVA)**	**58**	**11**	**96**	**58**
11	Step Down Transformers-SDT(Nos)	6317	3144	2651	111508
12	Step Down Transformers (MVA)	95783	39777	553662	2363952
13	**Average Capacity of SDT (MVA)**	**15**	**13**	**209**	**21**
14	Distribution Transformers (Nos)	1342518	283834	3586	16274788
15	Distribution Transformers (MVA)	43495	14644	14288	834623
16	**Average Capacity of DTR (KVA)**	**32**	**52**	**3984**	**51**
17	Territory (Sq Km)	162975	155707	NA	3287000
18	Population (Million)	53	45	NA	1400
19	**Population Density (Nos)**	**325**	**289**	**NA**	**426**
20	Per Capita Consumption (Units sold by DISCOMs) (in Kwh)	1185	688	NA	915
21	Gross Per Capita Consu'n (Kwh)	1634	2419	NA	1331
22	**% Hike Per Capita Consumption**	**38%**	**252%**	**NA**	**45%**
23	Consumers (Million)	20	10	NA	350
24	**% of Consumers to Population**	**38%**	**22%**	**NA**	**25%**

Note: The Data given in the table is extracted from Chapter-8 & 9 of the Report titled All India Electricity Statistics for FY23 published by CEA, Govt of India in 2024.

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9.2 **AP supplies reliable power doubled the Consumers than Odisha:** AP supplies power to 20 million Consumers whereas Odisha supplies only to 10 million Consumers. The last row of the table no.3 given above states that 38% of population of AP are Power Consumers whereas 22% of Odisha Population becomes Power Consumers. The table further shows that 25% of India's Population are Power Consumers. This states that one connection of electricity is given for 4 people in India. Odisha DISCOMs have grossly failed to register consumer base not only at par with AP @38% but also national level @25%. The comparison of Odisha Consumer bases with AP @38% reveals that there are 70 lakh Consumers of Odisha who are still waiting to get a new power connection from TP DISCOMs. This is the blue picture of Odisha for which the State is bracketed backward, needs improvement. The aforesaid 70 lakh non-consumers are either prevented from supply or are not billed by TP DISCOMs. The increase of Consumer base of Odisha can be seen from the Table no.5 given below. In the table-5, OERC says that 92.84 Lakh Consumers were registered in FY21 which increased to 98.21 Lakh in FY23 & decreased to 95.07 Lakh in FY24 and latest PR report says that the Consumer Base of Odisha reached at 97.49 Lakh. The above upheaval picture reveals that there is absolutely no increase of consumer base in Odisha since Tata takes over all four DISCOMs. I may urge upon the learned Commission to initiate necessary actions for improvement of line networks and transformer capacity in order to accommodate additional 70 lakh consumers who are waiting to get power supply from TP DISCOMs in the interest of the State.

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TABLE-5

SL No	TP DISCOMs ODISHA PARTICULARS	FY21 Actual	FY23 Actual	FY24 Actual	FY25 Actual
A	ACTIVE CONSUMERS DATA	-	-	-	
1	Circles (Nos)	21	21	21	21
2	Divisions (Nos)	72	72	72	72
3	Sub-Divisions	222	223	223	223
4	Sections	747	742	742	742
5	GRFs	18	18	18	18
6	EHT Consumers (Nos)	121	139	145	156
7	HT Consumers (Nos)	4496	4824	14592	15156
8	LT Consumers (Nos)	9279096	9816083	9491906	9733483
9	**Total Consumers (Mar'25)**	**9283713**	**9821046**	**9506643**	**9748795**
10	New Connection-Pending TPCODL				22055

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9.3 Poor Line Networks responsible for low consumer base & unreliable supply: The Table-3 given above reveals that State Odisha has commissioned only 2800 Ckt Km length of 400 KV line whereas Andhra Pradesh has commissioned 5604 Ckt Km 400 KV lines which is doubled than Odisha. This indicates the excellent performance achieved by AP to supply reliable quality power to the consumers doubled than Odisha given that the area and population of both the States are more or less same. Similarly, AP provides one Lakh Ckt Km 11 KV lines and 1.10 lakh Km LT lines more than Odisha to meet the increased power demand of AP people. The total lines of AP is more by 2.50 lakh Ckt Km than Odisha. The above remarkable differences of line networks between AP and Odisha speaks about the better power supply position, high consumer base and rapid economic development of AP. The State Odisha is lagging far behind than AP, needs improvement in the interest of the State. I may urge upon the learned Commission to sketch out a comprehensive action plan to increase the line networks and consumer base at par with AP.

9.4 <u>Higher Transformers Capacity commissioned by AP than Odisha:</u> That the capacity of Step-up Transformers (SUT) and Step-down Transformers (SDT) commissioned by AP is very much higher than Odisha. AP has commissioned total capacity of 17252 MVA & 95783 MVA of SUT & SDT respectively whereas Odisha commissioned only 10375 MVA & 39777 MVA correspondingly. The capacity of SDT commissioned by AP is more than double of Odisha. The capacity of SDT in Odisha is merely 41.53% of AP. The Average Capacity of a SUT of AP has been arrived at 58 MVA in table no.4 whereas it is only 11 MVA in Odisha. Similarly, the Average Capacity of a SDT of AP is 15 MVA but it is only 13 MVA in Odisha. These figures reveal that AP has commissioned high capacity SUT & SDT to accommodate the surging power demand of a high consumer base State like AP whereas Odisha fails to do so. In case of DTRs, the Average capacity is 52 KVA in Odisha whereas in case of AP it is only 32 KVA. This means AP runs with LT less power supply and installs single phase transformer to reduce losses. But OERC in the last performance review of TP DISCOMs directs to phase out the DTRs less than 63 KVA in order to standardize DTRs at higher capacity. I may urge upon the learned Commission to view the paradoxical picture and initiate necessary action accordingly in the interest of the State.

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9.5 **Per Capita Power consumption of Odisha versus AP & India:** As stated in Table-3 above, the Population density of AP is better than Odisha. In AP, 325 people are living in a Sq Km whereas it is only 289 in Odisha. The Per Capita Power Consumption based on the units sold by DISCOMs of AP stands at 1185 Units whereas in case of Odisha it is only 688. This establishes the poor management of the power distribution segment and dismal performance of the Odisha power system in comparison to AP. The surprising picture is seen in the in serial no 21 of the Table-3 in which gross Per Capita Power Consumption of Andhra, Odisha and India are shown. The gross Per Capita power consumption of Odisha stands highest at 2419 Units in India whereas AP & India registered only 1634 and 1331 Units respectively. Odisha's gross per capita consumption for FY23 is increased by 252% than the per capita consumption sold by DISCOMs in the same year whereas AP registers only 38% increase and India's per capita consumption is increased by 45%. The abnormal increase of gross per capita consumption is due to massive captive consumption of power from CGPs in Odisha. Therefore, I hereby urge upon the leaned Commission to initiate necessary measures to restrict the operation of CGPs in Odisha as done by other States of India in the largest interest of the State.

10 **Domestic Consumption is only 10% whereas Industry & Commerce is 88%:** With reference to the CEA Report presented on the table-10 below, it is not out of place to submit that the total installed capacity of power generation in Odisha is 25 Thousand MW and the total power transmission/consumption of the State Odisha for FY25 is 1 lakh 20 Thousand MU out of which 48 Thousand MU is available with GRIDCO for bulk sale to TP DISCOMs and power trading. The Report further states that Domestic Consumption of Odisha is only 10% whereas the consumption of Industry & Commerce is 88% and the balance is Agriculture & others. The State Regulator OERC, the State Designated Entity GRIDCO & the State Transmission Utility OPTCL have been able to account for only 48 Thousand MU and the balance is unaccounted for in the tariff proceeding conducted by OERC. That means 40% of total power consumption is accounted by the Regulator leaving the majority 60% unaccounted for.

10.1 **POSOCO is getting inter-State transmission charges but SLDC does not intra-State Transmission Charges:** The learned Commission may please note that, Section 86(1)(g) of the Electricity Act, 2003 empowers the State Commission

to levy fee for the purposes of the Act and Section 32(3) empowers the State Load Despatch Centre to levy & collect such fees & charges from the generating Companies and Licensees engaged in intra-state transmission of electricity as may be specified by State Commission. The total capacity of Captive Generating Plants (CGPs) worth 13260 MW commissioned in Odisha after getting the transmission connectivity approval from the SLDC wing of OPTCL. Electricity Energy is a magnetic energy transmitted in the line on the moment it got connected. For giving transmission connectivity to those CGPs, OPTCL had invested huge capital for the purpose. I am sorry to inform you the learned Commission that, POSOCO is charging the CGPs for their inter-state transmission of power generated in Odisha as per CERC Regulations but SLDC, the counterpart of POSOCO in Odisha have freed them for intra-transmission in the absence of desired State Regulations.

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10.2 **Industry cannot consume power from its grid connected CGPs without intra-State Transmission:** The Industry cannot consume its CGP power without intra-state transmission of power owned by SLDC due the laws of electrical engineering. The power generated by the grid connected CGPs transmitted immediately in the line Transmission Line operated by SLDC and manufactured by OPTCL. Therefore, all the power consumption of Industry from its CGPs is done through intra-State transmission of electricity against which SLDC will levy charges on behalf of the STU OPTCL. But sorry to inform you that the State Regulator misreads and misconceives the system, resulted the CGPs are escorted free from the purview of SLDC charges in view of section 32(3) of the Act. The Income earned by SLDC from intra-State transmission charges from CGPs will be shared between SLDC and OPTCL in the ratio of Capital Investment but this has not been done today. That is why POSOCO is getting inter-State transmission charges from Odisha CGPs but SLDC fails to get intra-State Charges.

10.3 **Levy on intra-State Transmission Charges on CGPs will reduce RST:** The Transmission Charges and SLDC charges determined by OERC will be reduced in accordance with total intra-State transmission charges collected by SLDC from CGPs on behalf of OPTCL. While the Transmission and SLDC Charges will be reduced, then definitely the RST of Odisha will be reduced. In the above backdrop, I may urge upon the learned Commission to initiate necessary action to enforce u/s 86 (1)(g) and 32(4)

of the Act and allow SLDC to collect intra-State transmission charges from the grid connected CGPs on behalf of OPTCL so as to generate more funds to augment the lines and transformer capacity of Odisha. Supply of reliable, quality and affordable power to the State People is the fundamental responsibility of the learned Commission. I do hope, the learned Commission may be kind enough to appreciate my above submission in the interest of the State.

10.4 **Comment of TP DISCOMs is desired on these issues:** The Table-6 given below depicts total capacity of power generation in Odisha after which I have presented the total power dealt by GRIDCO and then the ratio of consumption of power in the State. It is necessary to improve the Domestic and Agricultural power consumption of the State at par with national level. The CEA Report speaks that all India average of domestic consumption is 25% and Agriculture Consumption is 17%. The low domestic consumption of power is due to low consumer base in comparison to AP as stated below. More than 70 lakh connections can be to domestic consumers. The TP DISCOMs needs to speak on the issues raised above because it is their responsibility to supply reliable, quality and affordable power to the Consumers of Odisha.

TABLE-6

All India Electricity Statistics Report for FY23 published by CEA under General Review-2024.

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Total Power Generation in Odisha	
Name of Generations	**Capacity (in MW)**
Captive Generating Plants	13260
IPPs (Dual role)	1800
OHPC-Odisha Hydro Power Corporation	2100
OPGC-Odisha Power Generation Corpora	1740
NTPC-Kaniha & Darlipali	4600
Renewables-Solar, mini hydro & Biogas	1500
Grand Total	**25000**

Total Power Transaction in Odisha (in Units-KWh)	
Nature of Transaction	**Units (KWh)**

NOTARY GOVERNMENT OF ODISHA D.S. SAMANTARAY DIST-KHURDA

Units (KWh) Dealt by GRIDCO	48000
Units Dealt by Captive Plants (CGP)	72000
Total Tranasaction	**120000**

Total Power Consumption in Odisha		
Category	**Units (KWh)**	**%**
Domestic	12300	10%
Agriculture	1300	1%
Industry & Commerce	105000	88%
Others	1400	1%
Grand Total	**120000**	**100%**

Power Analyst Odisha

PRAYER

It is, therefore, most respectfully prayed that the Hon'ble OERC may graciously be pleased:

(i) to admit this e-Public comments;

(ii) to consider the value of the Assets & its relative Deferred Income liability recognised by the Auditor in the Balance Sheet of the Licensee as on FY25 while passing out the Depreciation Allowance;

(iii) to pass an order to discard the existing regulations in force relating to transmission tariff, SLDC Charges & Open Access Charges and frame upgraded regulations as per the method followed by Central Commission in view of Section 61(a) of the Act;

(iv) to initiate necessary action for recovery of the loss of professionalism commonly seen in the functioning of the Public Enterprises under the jurisdiction of OERC as per the provisions of the Act;

(v) to impart education on the primary & secondary role of the public enterprises in the minds of the managerial functionaries of the Licensee;

(vi) to direct the Secretary, OERC to supply me the Performance Review Report of OPTCL & SLDC for FY25;

(vii) to refrain the Licensee from any sort of mischievous submission on the body of the petition & related documents because that is loss of professionalism;

(viii) to consider the approved regulatory surplus of Rs. 48.50 Cr in the process of truing up Tariff for FY25;

(ix) to consider additional NTI of Rs. 155 Cr ignored by the Licensee in the proposed trued up petition for FY25;

(x) to pass an order to disallow the Return on Equity on Public Capital;

(xi) to increase the NTI at least at par with approved trued up NTI for FY25;

(xii) to pass an order to dismiss the proposal of negative revenue gap and tariff hike;

(xiii) to pass an order to dispose of case no 44/2024;

(xiv) to direct the Licensee to file comments on our Para no 7 to 9 in the greatest interest of the State;

(xv) condone any inadvertent omissions/errors/shortcomings & permit the Respondent to add/ change/modify/alter this filing & make further submissions as may be required at a further date;

And Hon'ble Commission may be pleased to pass such further or any other order(s) as may deem fit & proper in the facts and circumstances of the case in the interest of justice so as to make electricity sustainable;

This Humble Respondent craves leave and reserve the right to make further submission.

And for this act of kindness the Respondent shall as in duty bound ever pray.

Place: Bhubaneswar

Date: 16.01.2026

Ananda Kumar Mohapatra

Respondent

ANANDA KUMAR MOHAPATRA,
POWER ANALYST

Power Analyst
Odisha

NOTARY
GOVERNMENT OF ODISHA

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION

PLOT NO. 4, SAILESHREE VIHAR,

CHANDRASEKHARPUR, BHUBANESWAR-751021

CASE NO. 121/2025
FILING NO. 3

IN THE MATTER OF: (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

And

(ii) Truing up application for the FY 2024-25 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

AND

IN THE MATTER OF: Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

..... Applicant

vrs

Sri Ananda Kumar Mohapatra and **16 others.**

..... Objectors

Rejoinder to the objections raised by the Objector Sri Ananda Kumar Mohapatra.

The humble applicant above named

MOST RESPECTFULLY SHEWETH:

1. Vide affidavit dated 16.01.2026, the objector Sri Ananda Kumar Mohapatra has raised certain objections on ARR & Transmission Tariff Application of OPTCL for FY 2026-27 and Truing up application for FY 2024-25.

2. It is observed that in some of the paragraphs, the objector has raised certain suggestions and queries which are not directly relevant to the present Tariff Petition No. 121/2025. Accordingly, OPTCL refrains from offering any comments on such paragraphs.

3. Instead of giving a Para-wise Rejoinder, OPTCL is submitting the following reply in relevance to the ARR of OPTCL for F.Y. 2025-26 only as under:

4. **Reply to para 1.1**: It is submitted that Property, Plant & Equipment (PPE) stood at ₹5,264.29 crore as on 31.03.2024 and ₹5,360.26 crore as on 31.03.2025, as reflected in the Balance Sheet under the net block. During FY 2024–25, assets amounting to ₹528.41 crore were added. Similarly, during FY 2024–25, an amount of ₹860.81 crore was capitalized under Capital Work in Progress (CWIP) towards execution of ongoing and new projects. Therefore, the objection raised regarding slow increase in rate is devoid of merit.

As per the audited accounts, the Cash and Cash Equivalents as on 31.03.2025 is ₹1,656.60 crore, out of which ₹918.33 crore pertains to DISCOM projects being executed by OPTCL in its capacity as the implementing agency. It may be noted that funds received from the State Government under various schemes/projects are maintained either as cash balances or in fixed deposits. These funds are specifically earmarked for identified capital projects and cannot be diverted or utilized for meeting working capital requirements.

In the case of transmission utility, deferred income mainly comprises grants, subsidies, or consumer contributions received towards creation of assets. These amounts are initially treated as deferred income and are amortised to the Profit and Loss Account over the useful life of the corresponding assets, thereby matching income with depreciation expenses. Therefore, deferred income is not the element of ARR of OPTCL and should not be considered.

5. **Reply to para 1.2**: The basic contention of this paragraph is not clear; therefore, OPTCL prefers not to offer any further comments on the same. However, it is respectfully submitted that the present petition has been filed with due justification of component-wise projections in accordance with the provisions of the OERC Transmission Tariff Regulations, 2014, based on OPTCL's audited accounts for FY 2024-25 and supported by all relevant data, information, and materials. The detailed

projections are provided at Page 30 of OPTCL's present ARR application for FY 2026-27.

6. **Reply to para 2:** The review of the performance of OPTCL for the FY 2024-25 is conducted by OERC on 07.08.2025.

7. **Reply to para 3:** The proposed truing-up application for the FY 2024-25 is filed in compliance with Regulation 7.1 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 along with audited accounts for FY2024-25. Hon'ble Commission has derived the cumulative surplus over the years of ₹117.60 crore as on 31.03.2023.(Refer para-242, pg-78 , table-35 for the ARR order dated 13.02.2024 case No- 113/2023 "The summary of the truing-up approved by the Commission and cumulative surplus". Hon'ble Commission has deducted ₹48.50 Crore from above surplus of ₹117.60 crore and adjusted in the ARR for the FY 2024-25. The truing application is being filed on yearly basis and after scrutiny Hon'ble commission derived the cumulative surplus. Therefore, the effect of ₹48.50 Crore will be clubbed in the cumulative surplus/deficit automatically. Therefore, the apprehension of the objector has no merit.

8. **Reply to para 3.1:** The details of revenue receipts along with other income proposed for truing-up for FY 2024-25 are explained in Paragraphs 11 and 12 (Pages 54–55) of the petition, which may kindly be referred to. The Hon'ble Commission is requested to consider the same.

9. **Reply to para 3.2:** The depreciation needs to be calculated as per the Regulation 8.38 & 8.34 of OERC Transmission Tariff Regulations, 2014 . Depreciation shall be calculated for each year of the control period, on the Original Book Value of the Assets considering applicable depreciation rate as determined by the Commission from time to time. Further, it may be noted that the figure shown as PPA in the balance is the deemed cost as per the adoption of IND AS which is different from GFA. Therefore, the contention of the objector has no merit and not to be considered.

10. **Reply to para 3.3:** Hon'ble Commission has observed that the health of transmission assets is vital for smooth and reliable operation of transmission system assets. The Commission therefore desires that, OPTCL should incur R&M expenses exclusively for condition-based maintenance of transmission assets for improving reliability and availability of equipment & material associated with the

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transmission system for smooth and trouble-free operation of the system to extend their useful life. The large increase in OPTCL's assets base e.g substations and lines reasonably justify the rise in O&M expenditure. Deferred maintenance in a transmission system leads to outage, safety hazards and system failure which are ultimately costlier for the State. Effective O&M also ensures required quantum of power for adequate recovery of revenue. In the regulatory process all the controllable/uncontrollable cost incurred by licensee needs to be recovered through tariff so as to make it cost effective without burdening the future consumers. It is obligatory for the transmission licensee (STU) to conduct its operation within the amount approved by the Commission. Also, it caters to the growing demand of the state at optimal cost. Being the transmission licensee, OPTCL endeavours to control its expenditure on different heads to the maximum possible extent. It may be noted that as per the regulations the normative cost is 2.5% of the GFA which is more than ₹149.01 Crore. Further, the inspection cost is a statutory fee which should be allowed extra in addition to normal R & M Expenses. Therefore, the contention of the objector has no merit and not to be considered.

11. **Reply to para 3.4:** As per the Regulation 8.14 of OERC Regulations, 2014, Hon'ble Commission allowed A&G expenses by giving an escalation factor equal to WPI over the amount approved by the Commission in the previous year. However, it is submitted that due to growth and expansion of Transmission network, number of offices in headquarters as well as in field have increased over a period of time which requires the base A&G expenses to be revised over and above which WPI factor has to be factored in for arriving at the A&G expenses. OPTCL has explained in detail the expenditure incurred under A&G expenses at Pages 44 to 49 of the application. The Hon'ble Commission is requested to consider the same.

12. **Reply to para 3.5:** The contention raised by the objector with respect to Return on Equity (RoE) is beyond the scope of the applicable Acts and Regulations. Accordingly, the Hon'ble Commission is requested to allow RoE as justified in Para-9 at Pages 51–53 of the application.

13. **Reply to para 3.5:** As explained in Paragraph 10 at Page 53 of the application, the income tax amounting to ₹28.56 crore represents the actual income tax calculated and paid for FY 2024-25.

14. **Reply to para 4.1:** No specific objection or explanation has been furnished by the objector with respect to the proposed ARR of ₹1,490.05 crore being on the higher

side. However, OPTCL has provided all relevant information and supporting documentation along with the ARR application for the kind and favorable consideration of the Hon'ble Commission.

15. **Reply to para 4.2:** The projection of Miscellaneous Income amounting to ₹275.35 crore has been made considering the prevailing trends and expected future receivables. It is submitted that STOA-related income is inherently volatile in nature. Similarly, the interest income for FY 2026-27 is estimated not to exceed ₹20 crore. Accordingly, the Hon'ble Commission is requested to consider the Miscellaneous Income at ₹275.35 crore.
16. **Reply to para 4.3:** The projected MU for LTA customers proposed to be transacted during FY 2026-27 has been based on the information received from DISCOMs and the Long-Term Access (LTA) agreements executed with OPTCL. However, the projection pertaining to GRDICO may be subject to scrutiny and reconciliation.
17. **Reply to para 4.4:** The Transmission infrastructures are created considering the demand and request of the DISCOMs / Industries from time to time, with approval of Hon'ble OERC through Transmission Plan. Being a Deemed Transmission License, OPTCL has always endeavoured to create the Transmission infrastructure for providing reliable and quality power to the consumers of DISCOMs. Accordingly, every year OPTCL is adding more transmission assets to meet the requirement of DISCOMs.

Transmission Charge is arrived at 35.61 paise per unit by dividing the total ARR of OPTCL with the recent realistic MU projections of DISCOMs and recovered from them on a monthly basis. This rate will decrease if DISCOMs drawal increases. In fact, OPTCL has consistently advocated for the recovery of transmission charges based on contracted capacity, in line with the practice followed by STUs in other states.

18. **Reply to para 5:** The benefits derived by the CGPs with co-located loads are enormous. The benefits are in the nature of ancillary services which are not paid till now. The Grid support charges (GSC)/Parallel operation charge has been levied by different state Regulatory Commissions and upheld by APTEL and Supreme Court of India through various orders and hence proposed by OPTCL through a separate petition. OPTCL had filed an application (case No. 44 of 2024) on 26.06.2024 for determination and approval for levy of Grid Support Charges for industries having Captive Generating / Cogeneration plants and running in parallel with the Grids of OPTCL. Hon'ble Commission vide its order in case no. 44/2024 directed OPTCL to

submit a consolidated report considering the observations/queries raised by the stakeholders in the earlier Cases filed by OPTCL. In compliance to above, OPTCL has filed the requisite report before Hon'ble Commission on 29.01.2025.

19. Reply to para 6: The compliance report in response to the observations of the Hon'ble Commission in the ARR for FY 2025-26 will be submitted shortly.

20. Anything not specifically admitted or dealt with shall be deemed to have been denied. The Answering Respondent craves leave and reserves its rights to make further submissions at the time of hearing. The objections not specifically admitted may be deemed to have been denied.

PRAYER

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections/ prayers of Sri Ananda Kumar Mohapatra while approving ARR and Transmission Tariff of OPTCL for FY 2026-26 & Truing up application for the FY 2024-25.

By the Applicant
Through

Sr.General Manager (RT&C)
OPTCL, Bhubaneswar

NOTARY ★ VISHAKHAPATNAM ★ GOVT. OF INDIA

Bhubaneswar
27th January 2026

TPSODL

TPSODL/Regulatory /2026/07/383 16-January-26

Secretary

Odisha Electricity Regulatory Commission
Bidyut Niyamak Bhawan
Plot No 4, Chunokoli
Shailashree Vihar
Bhubaneshwar 751021

Sub.: Application under Sections 62 & 64(2) and all other relevant provisions of the Electricity Act, 2003 read with OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and OERC Regulation 53 (7) of the OERC (Conduct of Business) Regulations, 2004 for approval of Aggregate Revenue Requirement and Determination of Transmission Tariff for the FY 2026-27 along with Truing up application for FY 2024-25, filed by Odisha Power Transmission Corporation Ltd. (OPTCL). **(Case No 121 of 2025)**

Ref.: Hon'ble Commission letter Case No. 121/2025/1589 dated 17.12.2025.

Dear Sir,

M/s OPTCL has filed the above petition seeking approval of Aggregate Revenue Requirement and Determination of Transmission Tariff for the FY 2026-27 along with Truing up application for FY 2024-25 under Sections 62 & 64(2) and all other relevant provisions of the Electricity Act, 2003 read with OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and OERC Regulation 53 (7) of the OERC (Conduct of Business) Regulations, 2004.

In this regard, we are herewith attaching the observations/views as Appendix on behalf of TPSODL.

We trust our submissions are in order.

Yours faithfully

(Soumitry Dey)
Head-Regulatory

TP **SOUTHERN** ODISHA DISTRIBUTION LIMITED
(A Joint Venture of Tata Power and Government of Odisha)
Regd./Corp Office: Kamapalli, Courtpeta, Berhampur, Ganjam, Odisha – 760 004
Website: www.tpsouthernodisha.com Email: tpsodl@tpsouthernodisha.com
Corporate Identification Number (CIN):U40109OR2020PLC035195, GSTN: 21AAICT3239P1Z1

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION,
BIDYUT NIYAMAK BHAWAN.
PLOT No-4, CHUNOKOLI, SHAILASHREE VIHAR, BHUBANESWAR-751021

Case No. 121 of 2025

IN THE MATTER OF: Application under Sections 62 & 64(2) and all other relevant provisions of the Electricity Act, 2003 read with OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and OERC Regulation 53 (7) of the OERC (Conduct of Business) Regulations, 2004 for approval of Aggregate Revenue Requirement and Determination of Transmission Tariff for the FY 2026-27 along with Truing up application for FY 2024-25.

And

IN THE MATTER OF: M/s OPTCL Ltd.

..... *Petitioner*

And

IN THE MATTER OF: TP Southern Odisha Distribution Ltd., Corporate Office, Kamapally, Courtpeta, Berhampur, Ganjam District, Odisha 760004

..... *Respondent*

AFFIDAVIT

I Soumitry Dey, aged about 48 years, s/o. Late Banshidhar Dey, working as the Head Regulatory Affairs, do hereby solemnly affirm and state as follows:

a) That, I am working as Head Regulatory Affairs of TPSODL, Courtpeta, Berhampur, Dist. - Ganjam-760004. I am the authorized representative in the above matter and duly authorized by the said applicant to make this affidavit on its behalf.

b) That, I have gone through the contentions in this submission and understood the contents thereof.

c) That, the facts stated in the present application are true to the best my knowledge and belief, and the same are based upon available records.

Deponent

Verified that the contents of above affidavit are true and correct, no part it is false and nothing material has been concealed there-from.

Verified at Berhampur2 on this 16th day of Jan. 2026

Deponent

16-1-2026

Identified by the ADVOCATE

DECLARATION
The deponent having been identified to me
Solemnly affirmed before me
Notary
Aswini Ku Mahapatra
M.A., LL.B
NOTARY, BERHAMPUR (GANJAM)
Sl.No. Time Place

TPSODL

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION,
BIDYUT NIYAMAK BHAWAN.
PLOT No-4, CHUNOKOLI, SHAILASHREE VIHAR, BHUBANESWAR-751021

Case No. 121 of 2025

IN THE MATTER OF: Application under Sections 62 & 64(2) and all other relevant provisions of the Electricity Act, 2003 read with OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and OERC Regulation 53 (7) of the OERC (Conduct of Business) Regulations, 2004 for approval of Aggregate Revenue Requirement and Determination of Transmission Tariff for the FY 2026-27 along with Truing up application for FY 2024-25.

And

IN THE MATTER OF: M/s OPTCL Ltd. ..... ***Petitioner***

And

IN THE MATTER OF: TP Southern Odisha Distribution Ltd., Corporate Office, Kamapally, Courtpeta, Berhampur, Ganjam District, Odisha 760004 ..... ***Respondent***

MOST RESPECTFULLY SHEWETH

1. That, TP Southern Odisha Distribution Limited (herein referred to as "TPSODL")/the Respondent has taken over the distribution business from erstwhile SOUTHCO utility w.e.f. 01.01.2021 as per terms of Order dated 28.12.2020 (hereinafter referred to as "Vesting Order") wherein it is submitted that TPSODL is a joint venture between The Tata Power Company Limited and the Government of Odisha with equity participation of 51% by The Tata Power Company Ltd.

2. That, further it is noteworthy to submit that the Respondent is the Distribution Licensee, as per License Condition issued by the Hon'ble Commission dated 26.03.2021 and distributes electricity in 8 revenue districts namely Boudh, Gajapati, Ganjam, Kandhamal, Koraput, Malkangiri, Nabrangpur and Rayagada in southern part of Odisha having with area of operation of 48,751 Sq.Km.

3. That, as per mandate of Vesting Order, TPSODL is procuring power from GRIDCO, who is the state designated entity to procure power for all the 4 DISCOM(s) from different generators like Thermal, Hydel, Renewable etc.

TP SOUTHERN ODISHA DISTRIBUTION LTD. BERHAMPUR

4. That, the Petitioner Odisha Power Transmission Corporation Ltd. (hereinafter referred to as "OPTCL") is a deemed Transmission Licensee under fifth proviso of section 14 of the Electricity Act, 2003. OPTCL is mandated to undertake the activities of transmission of electricity in the state of Odisha. As per the said Transfer Scheme, OPTCL has also been notified as State Transmission Utility (hereinafter referred to as "STU").

5. That, the present application bearing Case No. 121 of 2025 has been filed by the Petitioner before Hon'ble Commission on 29.11.2025 for approval of its Aggregate Revenue Requirement and determination of Transmission Tariff for the Financial Year 2026-27 along with its Truing Up application for FY 2024-25.

6. That, the Petitioner has projected the Revenue Deficit of Rs. 423.04 Crores for FY 2026-27, at the existing Transmission Tariff of 25.5 paisa/unit with estimated transmission of 41,849.28 MU. The proposed Transmission tariff is abnormally high and should not be permitted. This will adversely affect the RST of the DISCOMs and will be huge burden on the consumers of Odisha.

7. That, the revenue requirement projected by the applicant for the FY 2026-27 is about 45% more than that approved for the FY 2025-26. The comparative figures of components of ARR are given in the table below:

Amount in Rs. Cr

ITEMS	OERC Approval		OPTCL Proposal	% Increase	
	FY 2024-25	FY 2025-26	FY 2026-27	FY 25-26 vs FY 24-25	FY 26-27 vs FY 25-26
A) FIXED COST					
1. O&M Expenses	**661.03**	**695.93**	**838.47**	**5.28%**	**20.48%**
(i) Employees Cost including Terminal Benefits	*488.63*	*493.12*	*531.52*	*0.92%*	*7.79%*
(ii) A&G Cost	*37.05*	*42.46*	*46.95*	*14.60%*	*10.57%*
(iii) R&M Cost	*135*	*160*	*259.65*	*18.52%*	*62.28%*
(iv) Expenses related to auxiliary energy consumption	*0*	*0*	*0*	*0 %*	*0 %*
(v) Other misc. expenses, statutory levies and taxes (GCC)	*0.35*	*0.35*	*0.35*	*0 %*	*0 %*
2. Interest & Financial Charges	**151.8**	**140.54**	**268.44**	**-7.42%**	**91.01%**
(i) Interest on Loan Capital	*133.95*	*120.37*	*240.91*	*-10.14%*	*100.14%*
(ii) Interest on Working Capital	*0*	*0*	*0*	*0 %*	*0 %*
(iii) Rebate	*17.85*	*20.17*	*27.53*	*13.00%*	*36.49%*
(iv) Incentive as per OREP-2022	*2.31*	*0*	*0*	*-100.00%*	*0 %*
3. Depreciation & amortisation expense	**275.67**	**284.33**	**337.09**	**3.14%**	**18.56%**
4. Return on Equity	**162.14**	**194.45**	**279.11**	**19.93%**	**43.54%**

TP SOUTHERN ODISHA DISTRIBUTION LTD. BERHAMPUR

ITEMS	OERC Approval		OPTCL Proposal	% Increase	
	FY 2024-25	FY 2025-26	FY 2026-27	FY 25-26 vs FY 24-25	FY 26-27 vs FY 25-26
5. Income Tax	**7**	**10.77**	**28.56**	**53.86%**	**165.18%**
Sub-Total (A)	**1,257.64**	**1,326.02**	**1,751.67**	**5.44%**	**32.10%**
B) Others					
Incentive for system availability	**5**	**5**	**13.73**	**0 %**	**174.60%**
Total Trans. Cost (A+B)	**1,262.64**	**1,331.02**	**1,765.40**	**5.42%**	**32.64%**
C) Less Misc. Receipts	**302.75**	**306.42**	**275.35**	1.21%	-10.14%
D) Less: Regulatory Surplus	**48.5**	**0**		-100.00%	0 %
E) ARR to be recovered from LTOA Customers i.e. **OPTCL's Aggregate Revenue Requirement**	**911.39**	**1,024.60**	**1,490.05**	**12.42%**	**45.43%**

8. That, the Truing Up proposed by the Applicant for FY 2024-25 is showing Rs. 53.07 Cr. deficit.

Particulars	OERC Approval	Actual as per Audited Accounts	Truing Up	Surplus/ (Deficit)
A. Employee Cost (Net)	488.63	473.39	473.39	15.24
B. R&M Cost	135.00	149.01	149.01	-14.01
C. A&G Cost (Including SLDC & GCC)	37.05	44.76	41.60	-4.55
Sub-Total (A+B+C)	**660.68**	**667.16**	**664.00**	**-3.32**
D. Depreciation	275.67	408.91	269.89	5.78
E. Interest on Long-term liability	133.95	131.38	131.38	2.57
F. Rebate	20.16	15.93	15.93	4.23
G. Incentive for system availability	5.00	5.00	13.73	-8.73
H. GCC Expenses	0.35			0.35
Sub-Total (A to H)	**1095.81**	**1228.38**	**1094.93**	**0.88**
I. Return on Equity	162.14		173.12	-10.98
J. Income Tax	7.00		28.56	-21.56
Grand Total (A to J)	**1264.95**	**1228.38**	**1296.61**	**-31.66**
Less: Inter-state wheeling & Misc. Revenue	302.75	347.51	347.51	-44.76
Less: Regulatory Surplus	48.50			48.50
Net Transmission Cost	**913.70**	**880.87**	**949.10**	**-35.40**
Revenue from Transmission Charges	913.76	896.09	896.09	17.67
Difference to be allowed in truing up (FY 2024-25)	**(0.06)**	**(15.22)**	**53.01**	**(53.07)**

TPSODL Views/Suggestions:

9. That, the Petitioner has proposed 7.79% hike under **Employee Expenses for FY 26-27** as compared to the approved Employee expenses for the previous year. As per the

TP SOUTHERN ODISHA DISTRIBUTION LIMITED BERHAMPUR

True up submission for FY 24-25, the actual employee cost for FY 24-25 is Rs. 473.39 Cr. and for the current FY 2025-26 the Applicant has estimated Rs. 503.85 Cr. and Rs. 531.52 Cr for ensuing year.

The Hon'ble Commission is requested to approve the employee expenses based on actuals till December-2025.

10. That, the Petitioner has proposed 10.57% hike in **A&G expenses for FY 26-27** as compared to the approved A&G expenses for the previous year. As per the True up submission for FY 24-25, the actual A&G expenses for FY 24-25 is Rs. 44.76 Cr. against OERC approval of Rs. 37.05 Cr. The expenses proposed are majorly towards property related expenses, communication, professional charges, conveyance & travelling, SLDC charges, licensee fee and material related expenses. Hon'ble Commission has been approving A&G expenses as per escalation factor equal to WPI over the amount approved in the previous year.

    However, the Applicant has requested to consider at least 7% escalation in line with OERC RST Regulation, 2022. Therefore, Hon'ble Commission may take a suitable decision in this regard after prudence check.

11. That, the Petitioner has proposed 62.28% hike in **R&M Expenses for FY 26-27** as compared to approved higher as compared to the approved R&M Expenses for the previous year. As per the True up submission for FY 24-25, the actual R&M Expenses for FY 24-25 is Rs. 149.01 Cr. against OERC approval of Rs. 135 Cr. Further, the actual expenses till Sep-25 is Rs. 75.13 Cr and current year estimation is Rs 154 Cr against which ensuing year proposed amount is Rs. 259.65 Cr. For this, the applicant has provided a list of items which needs to be replaced, repaired and maintained.

    Therefore, Hon'ble Commission is requested to approve the R&M expenses based on actuals expenses till December-2025.

12. That, the Petitioner has proposed a **Return on Equity (RoE) for FY 2026-27** which is about 43.54% higher than the RoE approved for the previous year, whereas under the Transmission Tariff Regulations, RoE is allowable at 15.5% per annum only, on the equity base approved by the Hon'ble Commission.

    It is submitted that the Hon'ble Commission, in its Tariff Order dated 24.03.2025 in Case No. 93 of 2024, had approved an equity base of Rs. 1078.17 Cr., and the asset additions now projected by the Applicant do not justify the substantially higher

TP SOUTHERN ODISHA DISTRIBUTION LTD. BERHAMPUR

equity base; particularly in absence of actual capitalization details up to September 2025. Even after assuming the full materialization of estimated capitalization figure, the equity base for RoE would be limited, corresponding to a RoE of about Rs. 279.11 Cr., and as per the methodology consistently adopted by the Hon'ble Commission in earlier tariff orders, the revised equity base has to be worked out. That, in terms of the above, the Hon'ble Commission is requested to compute the RoE based on the approved equity base and allow the same to the Applicant after due prudence check.

13. That, the Petitioner has proposed 165.18% hike in **Income Tax for FY 26-27** as compared to approved Income Tax for the previous year.

    The Hon'ble Commission may take a suitable decision while approving the Income Tax expenses subject to actual payment which will be verified during truing up exercise of that year.

14. That, the Petitioner has proposed a deficit of Rs. 53.07 Cr. in the Truing up application for FY 24-25. From the Transmission Tariff Order dated 24.03.2025 it is observed that the Hon'ble Commission has approved the truing up till FY 23-24 wherein the cumulative surplus is Rs 80.57 Cr.

    Therefore, having cumulative available surplus, Hon'ble Commission may take a prudence check and approve the truing up for FY 24-25.

15. That, the Petitioner has proposed a tariff hike of 10.11 paisa per unit which is 40% higher than the existing transmission charges. Therefore, any increase in transmission charges will result in corresponding increase in the Retail Supply Tariff, for which Hon'ble Commission may take a prudent decision.

16. That. the Respondent craves leave for submission of further/additional submission as and when required.

TP SOUTHERN ODISHA DISTRIBUTION LTD. * BERHAMPUR *

Place: Berhampur
Date: 16 January 2026

(Soumitry Dey)
Head – Regulatory
TP Southern Odisha Distribution Ltd.

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
PLOT NO. 4, SAILESHREE VIHAR,
CHANDRASEKHARPUR, BHUBANESWAR-751021

CASE NO. 121/2025
FILING NO. 3

IN THE MATTER OF: (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

And

(ii) Truing up application for the FY 2024-25 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

AND
IN THE MATTER OF: Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

..... Applicant

vrs

TP Southern Odisha Distribution Limited and **16 others.**

..... Objectors

Rejoinder to the objections raised by the Objector TP Southern Odisha Distribution Limited (TPSODL).

The humble applicant above named
MOST RESPECTFULLY SHEWETH:

1. The answering Applicant denies all allegations, averments and submissions contained in the reply filed on behalf of TP Southern Odisha Distribution Limited (TPSODL), which are contrary to or inconsistent with the record and / or what is stated hereinafter. Instead of giving a Para-wise Rejoinder, it is submitted as under:

NOTARY GOVT. OF ODISHA

2. Vide affidavit dated 16.01.2026, TPSODL has raised certain objections on ARR & Transmission Tariff Application of OPTCL for FY 2026-27 and Truing up application for FY 2024-25.

3. M/s. Odisha Power Transmission Corporation Limited, Bhubaneswar (in short OPTCL) undertakes Intra State transmission business in the state of Odisha. It has been notified as the State Transmission Utility (STU) U/s 39(1) of the Electricity, 2003.

4. Being the STU as well as a Transmission licensee, OPTCL is primarily responsible for transmitting electricity from power generation companies to the distribution companies within the State. The transmission infrastructures have been created based on the requirement / recommendation of Distribution Companies considering following components mainly:-

   - To provide the power supply to upcoming Industrial hub.
   - To strengthen the Inter State Power connectivity for import / export of power.
   - To improve the voltage profile in the low voltage area/pockets.
   - To provide un-interrupted power to the EHT, HT and LT Consumers of the state
   - Availability of alternate power supply and also meet the N-1 Transmission planning criteria
   - To improve the system availability, reliability & quality of the power supply.
   - To meet the future load growth.
   - To improve socio economic status of peripheral inhabitants.
   - To reduce Transmission Losses.

5. It may be noted that OPTCL has been consistently maintaining system availability at around 99.98% which is more than the normative system availability of 98.50%.

6. Except NALCO & IMFA, all the open access customers are the consumers of Distribution Companies. Therefore, the consumers of Odisha are the ultimate beneficiaries of all the transmission infrastructure created by OPTCL.

7. OPTCL has adopted the principles enunciated in the Transmission Tariff Regulations, 2014 for proposing the different components of ARR for FY 2026-27 in the present application. Except return on equity, all the components allowed in the ARR are subject to truing up, which are carried out on the basis of actual expenses booked in the Audited books of Accounts of OPTCL. Considering the requirement for expenses on operation and maintenance, debt service obligation and other expenditure as per the provision stipulated in the Regulations, 2014, the transmission tariff is projected with justifications.

8. In the regulatory process all the controllable/uncontrollable cost incurred by licensee needs to be recovered through tariff so as to make it cost effective without burdening the future consumers. It is obligatory for the transmission licensee (STU) to conduct its operation within the amount approved by the Commission. Also, it caters to the growing demand of the state at optimal cost. Being the transmission licensee, OPTCL endeavors to control its expenditure on different heads to the maximum possible extent. It may be pertinent to mention that projection has been made based on the actual expenditure incurred in 1st half of FY 2025-26 along with the likely expenditure to be incurred in FY 2026-27.

9. Due to impact of inflationary effects, the increase in cost is quite inevitable which needs to be considered in the transmission tariff process by the Hon'ble Commission. It is pertinent to mention that the STU charges in the state are comparably low with respect to CTU charges and STU charges of other states.

10. Para 1 to 8 are the matters of record. .

11. **Para 9:** The projection of Employee Cost amounting to Rs. 531.52 Cr. is calculated in line with the Regulation 8.6 to 8.11 of OERC Regulations, 2014 with detailed justification. With regard to the approximately 8% increase in employee cost, the same is duly justified. Moreover, the employee cost projections of the DISCOMs are also broadly at a similar level.

    Further, out of the total proposed employee cost, an amount of ₹205.84 crore has been projected towards meeting the terminal liability obligations of retired employees absorbed from the erstwhile OSEB, GRIDCO, etc. Accordingly, the actual employee cost attributable to current operations is substantially lower than the total ARR projection.

12. **Para 10:** It is submitted that the nature of A&G expenses of the power utilities are almost the same. However, it is observed that for FY 2025-26, Hon'ble Commission had considered the escalation factor of all the utilities differently. The escalation factor for OPTCL is 2.37%, GRIDCO is 5.00%, DISCOMs is 7.00% and OHPC is 5.47%. Ideally, the escalation factor of all the utilities should have been in parity. Therefore, it should be 7% in line with DISCOMs . As per the Regulations, the A&G cost should be increased by WPI on the base year, provided the number of establishments have remained the same. But the number of establishments/offices of OPTCL has increased over a period of time commensurating with the increase in asset by addition of grid Sub-stations, ckt. kilometers of lines and MVA capacity for better supervision in construction, operation and maintenance and for maintaining quality of supply. Hence, A&G expenses should

be increased proportionately. Further, it is submitted that some of the A&G Expenses are related to CPI also and it is evident that every year the actual expenses have crossed the approved amount despite it being a controllable expenditure. Therefore, Hon'ble Commission is hereby requested to consider the proposal of OPTCL and allow Rs. 46.95 Cr. towards Administrative and General Expenses (A&G). Further, considering the 7% escalation factor over last year it would be almost the same.

13. **Para11:** In the last year Tariff Order, Hon'ble Commission has observed that the health of transmission assets is vital for smooth and reliable operation of transmission system assets. The Commission therefore desires that OPTCL should incur R&M expenses exclusively for condition-based maintenance of transmission assets for improving reliability and availability of equipment & material associated with the transmission system for smooth and trouble-free operation of the system. The large increase in OPTCL's assets based, substations and lines reasonably justifies the rise in O&M expenditure . Deferred maintenance in a transmission system leads to outage, safety hazards and system failure which are ultimately costlier for the State. Effective O&M also ensures required quantum of power for adequate recovery of revenue.

It may be noted that the major R&M works are carried out usually during working season i.e. from January to March of every year. OPTCL has planned for additional R&M expenditure apart from the usual trend towards the following, Renovation works like re-metaling, fencing works, illumination, repairing of approach roads & boundaries, Earth pit maintenance & provision of contour & tripod earthing, provision of mandatory spares for AIS/GIS substations, provision of Binoculars/High beam torch lights for Grid Substations, provision of common entry gate for all GSSs, replacement of OIP bushings with RIP bushings & replacement of porcelain LA with Polymer LA near transformers, strengthening of LA earthing & provision of LA monitors, Control room building & store maintenance, Cable trench & drainage system maintenance etc. of old grid substations, renovation works of EHT lines like revetment, recouping, putting tower footing earthing resistance, provision of TLAs (Transmission Lighting Arrestor), replacement of DISC insulators at all Road crossing and all tension points, replacement of multi-midspan joints & rectification of lines with intermittent PG clamps, tower painting, jumper replacement, stub repairing, AI based line patrolling, maintaining statutory clearance (with interposing towers) and miscellaneous works like provision of firefighting system for transformers, AMC for SAS, GPS based synchronizing equipment, cranes & lifts etc, Sanitation, reconditioning of 20MVA, 40MVA & 100MVA power transformers, Inspection Fees, procurement of Safety shoe, jacket, harness, helmet etc., Engagement of

Nabakrushna Barik

Security personnel and Jhulla & Tower Climbers, procurement of towers/structures/hardware fittings, Power & Control cables and Battery & chargers, Replacement of old ACDB & DCDB, Repair & replacement of old testing equipment, procurement of T&P materials.

It is pertinent to mention that statutory payments such as salaries of security personnel, Jhula and tower climbers, inspection fees, etc., are incurred on a regular monthly basis. However, expenditure towards grid and line maintenance works is generally booked towards the end of the financial year based on the bills submitted, i.e., after completion of the respective works during the working season. Consequently, R&M expenditure remains relatively low during the first nine months of the year, whereas nearly 40% of the total expenditure is accounted for during the last three months. As of December 2025, about ₹140 crore has been incurred towards R&M works, and for the full financial year, the total expenditure is expected to be ₹199 crore. Accordingly, OPTCL projected Rs. 259.65 Cr. towards Repair & maintenance which is well within the regulatory limit of Rs. 251.50 Cr. (i.e. 2.50% of GFA as on 31.03.2025). Hon'ble Commission is hereby requested to consider the proposal of OPTCL and allow Rs.259.65 Cr. towards Repair & Maintenance Expenses (R&M).Further, considering the substantial transmission asset base, Repair and Maintenance expenses at 2.5% of the Gross Fixed Assets are admissible under the applicable regulations.

14. **Para 12:** Regulation 8.27 of OERC Regulations, 2014 stipulate that the Return on Equity (RoE) shall be computed in rupee terms, on the equity base determined in accordance with regulations 4.8 to 4.22 and regulation 8.17 to 8.24. Further, as per the Regulations 8.28 & 8.29 STU (OPTCL) shall be allowed a Return on Equity Capital in rupee terms at the rate of 15.5% per annum (post tax), on the amount of equity capital base as determined by the Commission. This rate of return needs to be grossed up with the normal applicable tax rate. Further, the maximum equity allowable for ROE as per the regulation is 30% of the Capital Cost (GFA). The "Book value of own Assets as on 31.03.2026 (on which depreciation will be calculated) is **Rs. 6002.32 cr.**. Considering the above, OPTCL has projected the ROE of Rs. 279.11 Cr. @ 15.5% of equity base of Rs. 1800.696 Cr. (i.e. 30% of the GFA: – Rs. 6002.32 Cr. as on 31.03.2026). Hon'ble Commission is hereby requested to consider the proposal of OPTCL and allow Rs.279.11 Cr. towards Return on Equity (RoE).

15. **Para 13:** Regulation 8.44 of OERC Regulations, 2014 stipulates that "the **actual assessment** of income tax should take into account benefits of tax holidays and the credit for carry forward losses applicable as per the provisions of the Income Tax, Act

1961 shall be passed on to the consumers". In this regard, it is submitted that OPTCL has paid income tax amounting to ₹28.56 Cr. for the AY 2025-26. The same amount of ₹28.56 Cr. is proposed for FY 2026-27. However, differences if any, as per the Regulation 8.43 and 8.44, shall be adjusted during the true up exercise based on audited accounts.

16. **Para 14:** OPTCL has filed the trueing up application as per the Regulation 7.1 (Truing up of Capital Expenditure and Tariff) of OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 . Hon'ble Commission is hereby requested to consider the deficit ₹53.07 Cr. in truing up for the FY 2024-25.

17. The Transmission infrastructures are created considering the demand and request of the DISCOMs from time to time, after due approval form the Hon'ble OERC through Transmission Plan. Being a Transmission License, OPTCL has always endeavored to create the Transmission infrastructure for providing reliable and quality power to the consumers of DISCOMs. Accordingly, every year OPTCL is adding more transmission assets to meet the requirement of DISCOMs. Therefore, the ARR of OPTCL will be on an increasing trend in comparison to the previous year and OPTCL is entitled to recover its ARR fully from the DISCOMs. It is anticipated that the demand of DISCOMs (in MU) will increase proportionately with respect to addition of Infrastructure in the coming years.

18. OPTCL has proposed to recover the ARR amount of Rs. 1490.05 Cr. from LTOA customers including DISCOMs. It is proposed that Rs. 1376.81 Cr. to be recovered from DISCOMs for transmission of 38663.46 MU energy @ 35.61 P / kwh as transmission charges as detailed below:-

. No.	DISCOMS	Energy Projected (MU)	Less:- Drawal in 33 & 11 Kv	t Projected energy (MU)	Proposed rate@ p/u	Rs in Cr.
	CODL	13248	32.00	13216	35.61	470.62
	WODL	11952	324.00	11628	35.61	414.07
	NODL	8853.46	31.00	8822.46	35.61	314.17
	SODL	5050	53.00	4997	35.61	177.94
	TAL	**39103.46**	**440.00**	**38663.46**		**1376.81**

The quantum of energy projections were made based on the information received from DISCOMs.

19. The ARR projection of Rs.1490.05 Cr. for FY 2026-27 is increased by 6.53% over the projection of FY 2025-26. Transmission charge is arrived at 35.61 paise per unit by dividing the total ARR of OPTCL with the recent realistic MU projections of DISCOMs and recovered from them on a monthly basis. This rate will decrease if DISCOMs drawal increases.

20. Hence, mere apprehension of TPSODL towards imposition of excessive burden on Discoms seems to be inappropriate and unacceptable which is likely to be rejected at this juncture. Moreover, the contention of the stake holder operating in the value chain of electricity needs to appreciate the fact that the cost recovery has to be in full so as to make the sector sustainable.

21. Anything not specifically admitted or dealt with shall be deemed to have been denied. The answering Applicant craves leave and reserves its rights to make further submissions at the time of hearing. The objections not specifically admitted may be deemed to have been denied.

PRAYER

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of TPSODL while approving ARR and Transmission Tariff of OPTCL for FY 2026-27 & Truing up application for the FY 2024-25.

By the Applicant
Through

Sr. GM (El.), RT&C

Bhubaneswar
January 27, 2026

NOTARY GOVT. OF ODISHA

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION,
BIDYUT NIYAMAK BHAWAN.
PLOT No-4, CHUNOKOLI, SHAILASHREE VIHAR, BHUBANESWAR-751021

Case No. 121 of 2025

IN THE MATTER OF: An Application under Sections 62 & 64(2) and all other relevant provisions of the Electricity Act, 2003 read with OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and OERC Regulation 53 (7) of the OERC (Conduct of Business) Regulations, 2004 for approval of Aggregate Revenue Requirement and Determination of Transmission Tariff for the FY 2026-27 along with Truing up application for FY 2024-25 filed by Odisha Power Transmission Corporation Ltd. (OPTCL) before the Odisha Electricity Regulatory Commission, Bhubaneswar-21.

IN THE MATTER OF: M/s Odisha Power Transmission Corporation Ltd. (OPTCL)

...Petitioner

IN THE MATTER OF:

TP Central Odisha Distribution Limited (TPCODL)

...Respondent

ANIL KR. MOHANTY REGD. No.- ON-116/2009 SPECIAL ADHESIVE NOTARY

Affidavit 16 JAN 2026

I, Bharat Kumar Bhadawat, aged about 54 Years, son of late Shri Shankar Lal Bhadawat residing at Bhubaneswar do hereby solemnly affirm and say as follows:

NOTARY ANIL KR. MOHANTY BHUBANESWAR REGD. No.- ON-116/2009 GOVT. OF ORISSA

1. I am the Chief-Regulatory & Legal of TP Central Odisha Distribution Ltd. the Respondent in the above matter and I am duly authorized to swear this affidavit on its behalf.
2. The statements made in the submission herein shown to me are based on information provided to me and I believe it to be true.

Bhubaneswar.

Dated: 16.01.2026

Bharat Kumar Bhadawat

Chief-Regulatory & Legal

Identified by

Advocate

...spondent above named being duly identified by Sri A. K. Mohanty, Advocate at appears before me on 16.01.26 at about 3:55 P.M. and states on oath that the contents of this affidavit are true to the best of his/her knowledge

ANIL KUMAR MOHANTY
NOTARY, BBSR
REGD. No.-ON-116/2009

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION,
BIDYUT NIYAMAK BHAWAN.
PLOT No-4, CHUNOKOLI, SHAILASHREE VIHAR, BHUBANESWAR-751021

Case No. 121 of 2025

IN THE MATTER OF: An Application under Sections 62 & 64(2) and all other relevant provisions of the Electricity Act, 2003 read with OERC (Terms and Conditions for determination of Transmission Tariff) Regulations, 2014 and OERC Regulation 53 (7) of the OERC (Conduct of Business) Regulations, 2004 for approval of Aggregate Revenue Requirement and Determination of Transmission Tariff for FY 2026-27 along with Truing up application for FY 2024-25 filed by Odisha Power Transmission Corporation Ltd. (OPTCL) before the Odisha Electricity Regulatory Commission, Bhubaneswar-21.

IN THE MATTER OF: M/s Odisha Power Transmission Corporation Ltd. (OPTCL)

...Petitioner

IN THE MATTER OF:

TP Central Odisha Distribution Limited (TPCODL)

...Respondent

Most Respectfully Sheweth,

1. That, the respondent DISCOM has commenced its operation w.e.f 01.06.2020 as per terms of Vesting Order dated 26.05.2020. TP Central Odisha Distribution Limited (TPCODL) is a joint venture between The Tata Power Company Ltd. and the Government of Odisha with equity participation of 51% by the Tata Power Company Ltd. and 49% by GRIDCO Ltd. On behalf of the Govt. of Odisha.

2. That, the respondent is the Distribution Licensee, as per License Condition dated 24.08.2020 of the Hon'ble Commission, in central part of Odisha having five Distribution Circle namely Bhubaneswar-I, Bhubaneswar-II, Cuttack, Dhenkanal and Paradeep with area of operation of 29354 Sq.Km.

3. That, the respondent DISCOM is required to "supply electricity" in accordance with the provisions as laid down under section 42 of the Electricity Act, 2003 which provides for duties of the Distribution Licensee.

4. That, as per mandate of Vesting Order, the Respondent is procuring power from GRIDCO, who is the state designated entity to procure power for all the 4 DISCOM(s) from different generators like Thermal, Hydel, Renewable etc. located in and outside Odisha.

TP Central Odisha Distribution Ltd. TPCODL BBSR

5. That, the Applicant is also a Deemed Transmission Licensee under Section 14 of the Electricity Act, 2003.

6. That, the Petitioner (M/s OPTCL) has filed the Aggregated Revenue Requirement & Transmission Tariff for FY 2026-27 and True Up for FY 2024-25 with following prayers.

   a. Approval of Aggregate Revenue Requirement of Rs. 1765.40 Cr.

   b. Recovery of Transmission Charge @ Rs.8545.00 /MW-Day i.e. 35.61 Paise/unit.

   c. Transmission Loss for FY 2026-27 as 3.05% on energy drawal.

   d. Truing up exercise for the FY 2024-25 and consider the deficit amount of Rs. 53.07 Cr

7. That, the Respondent DISCOM herewith submits its response/views to the ARR & True Up application of OPTCL as under:

Submission of TPCODL

8. That, the revenue requirement projected by the Petitioner for the FY 2026-27 is about 45% more than that approved for the FY 2025-26. The comparative figures of components of ARR are given in the table below:

ITEMS	OERC Approval		Increase in approved FY 25-26 over approved FY 24-25	Proposal for OPTCL	Increase in proposed FY 26-27 over approved FY 25-26
	FY 2025-26	FY 2024-25		FY 2026-27	
A) FIXED COST	**Rs. Cr**	**Rs. Cr**	**Rs. Cr**	**Rs. Cr**	**Rs. Cr**
1. O&M Expenses	**695.93**	**661.03**	**5.01%**	**838.47**	**20%**
(i) Employees Cost including Terminal Benefits	493.12	488.63	0.91%	531.52	8%
(ii) A&G Cost	42.46	37.05	15%	46.95	11%
(iii) R&M Cost	160	135	19%	259.65	62%
(iv) Expenses related to auxiliary energy consumption	0	0		0	
(v) Other misc. expenses, statutory levies and taxes (GCC)	0.35	0.35	0%	0.35	0%
2. Interest & Financial Charges	**140.54**	**151.8**	**-7%**	**268.44**	**91%**
(i) Interest on Loan Capital	120.37	133.95	-10%	240.91	100%
(ii) Interest on Working Capital		0		0	

The Central Odisha Distribution Ltd. TPCODL *BBSR*

ITEMS	OERC Approval		Increase in approved FY 25-26 over approved FY 24-25	Proposal for OPTCL	Increase in proposed FY 26-27 over approved FY 25-26
	FY 2025-26	FY 2024-25		FY 2026-27	
(iii) Rebate	20.17	17.85	13%	27.53	36%
(iv) Incentive as per OREP-2022		2.31		0	
3. Depreciation & amortization expense	**284.33**	**275.67**	**3%**	**337.09**	**19%**
4. Return on Equity	**194.45**	**162.14**	**20%**	**279.11**	**44%**
5. Income Tax	**10.77**	**7**	**54%**	**28.56**	**165%**
Sub-Total (A)	**1,326.02**	**1,257.64**	**5%**	**1,751.67**	**32%**
B) Others					
Incentive for system availability	5	5	0%	**13.73**	175%
Total Trans. Cost (A+B)	**1,331.02**	**1,262.64**	**5%**	**1,765.40**	**33%**
C) Less Misc. Receipts	**306.42**	**302.75**	1%	**275.35**	-10%
D) Less: Regulatory Surplus	**0**	**48.5**	-100%		
E) ARR to be recovered from LTOA Customers i.e. **OPTCL's Aggregate Revenue Requirement**	**1,024.60**	**911.39**	**12%**	**1,490.05**	**45%**

9. That, the Truing Up proposed by the Petitioner for FY 2024-25 is showing Rs. 53.07 Cr. deficit.

Particulars	OERC Approval	Actual as per Audited Accounts	Truing Up	Surplus/ (Deficit)
A. Employee Cost (Net)	488.63	473.39	473.39	15.24
B. R&M Cost	135	149.01	149.01	-14.01
C. A&G Cost (Including SLDC & GCC)	37.05	44.76	41.6	-4.55
Sub-Total (A+B+C)	**660.68**	**667.16**	**664**	**-3.32**
D. Depreciation	275.67	408.91	269.89	5.78
E. Interest on Long-term liability	133.95	131.38	131.38	2.57
F. Rebate	20.16	15.93	15.93	4.23
G. Incentive for system availability	5	5	13.73	-8.73
H. GCC Expenses	0.35			0.35
Sub-Total (A to H)	**1095.81**	**1228.38**	**1094.93**	**0.88**
I. Return on Equity	162.14		173.12	-10.98
J. Income Tax	7		28.56	-21.56
Grand Total (A to J)	**1264.95**	**1228.38**	**1296.61**	**-31.66**
Less: Inter-state wheeling & Misc. Revenue	302.75	347.51	347.51	-44.76
Less: Regulatory Surplus	48.5			48.5
Net Transmission Cost	**913.7**	**880.87**	**949.1**	**-35.4**
Revenue from Transmission Charges	913.76	896.09	896.09	17.67
Difference to be allowed in truing up (FY 2024-25)	**0.06**	**15.22**	**-53.01**	**53.07**

TP Central Odisha Distribution Ltd. TPCODL *BBSR*

10. **R&M Cost :**

That, the Petitioner has proposed 62% higher as compared to previous year ARR approved by the Hon'ble Commission under R&M Expenses. It may be noted that in truing up, the actual expenses for FY 2024-25 has come to Rs. 149.01 Cr. against approved amount of Rs. 135 Cr. Further, the actual expenses till Sep-25 is Rs. 75.13 Cr and current year estimation is Rs 154 Cr against which ensuing year proposed amount is Rs. 259.65 Cr. For this, the Petitioner has provided a list of items which needs to be replaced, repaired and maintained. Therefore, Hon'ble Commission is requested to approve the R&M expenses based actual asset base and prudence check.

11. Return on Equity:

That, the Petitioner has proposed a Return on Equity (RoE) for FY 2026–27 (15.5% of 30% on GFA of Rs. 6002.32 Cr) which is about 44% higher than the RoE approved for the previous year, whereas under the Transmission Tariff Regulations, RoE is allowable at 15.5% per annum only on the equity base approved by the Hon'ble Commission. It is submitted that the Hon'ble Commission, in its Tariff Order dated 24.03.2025 in Case No. 93 of 2024, had approved an equity base of Rs. 1078.17 Cr. as on 31.03.2024 (para 171 of order dated 24.03.2025)

> *171. Further, the Government of Odisha specifically in its letter No.3333 dated 24.03.2021 had communicated to the Commission that no return on equity shall be paid on the equity of Rs.647.00 Cr., which relates to the sanction of the Government towards the conversion of bond to the equity. Excluding the aforesaid amounts of Rs.657.30 Cr. & Rs.647.00 Cr. from the total equity capital of Rs.2382.71 Cr. infused by the Government of Odisha, the Commission has considered the equity capital of Rs.1078.17 Cr.* ***(i.e., Rs.2382.71 Cr. - Rs.657.30 Cr.- Rs.647.00 Cr.) as on 31.03.2024****. Further, the Commission had considered Rs.995.93 Cr. equity capital as on 31.03.2023 in the truing-up order for the FY 2022-23.*
>
> *Therefore, the Commission has evaluated the average equity capital of Rs.1037.17 Cr.{(Rs.995.93 Cr. + Rs.1078.17 Cr.)/2} for the FY 2023-24 and accordingly, approvesRs.160.76 Cr. (i.e. @15.5% of Rs.1037.17 Cr.) towards Return on Equity in this truing up for the FY 2023-24 against Rs.140.42 Cr. approved in the Transmission tariff Order of FY 2023-24.*
>
> ***(Empasis Supplied)***

12. That, the Petitioner may kindly justify such huge increase in equity capital in 2 years (i.e. from 1037.17 Cr as on 31.03.2024 to Rs. 1800.696 Cr (i.e. 30% of Rs. 6002.32 Cr) as on 31.03.2026 and may also confirm if the adjustment of Rs. 647 Cr and Rs. 657 Cr (as done at para 171 of the Order dated 24.03.2025) has been incorporated or not.

TP Central Odisha Distribution Ltd. TPCODL BBSR

13. **Income Tax** : That, the Petitioner has proposed 165% higher as compared to previous year ARR approved by the Hon'ble Commission under Income Tax. The Hon'ble Commission may take a suitable decision while approving the Income Tax expenses subject to actual payment which will be verified during truing up exercise of that year.

14. **Deficit :** That, the Petitioner has proposed a deficit of Rs. 53.07 Cr. under truing up application for FY 2024-25. From the Transmission Tariff Order dated 24.03.2025 it is observed that the Hon'ble Commission has approved the truing up till FY 23-24 wherein the cumulative surplus is Rs 80.57 Cr. Therefore, having cumulative available surplus, Hon'ble Commission may take a prudence check and approve the truing up for FY 24-25.

15. **Tariff Hike :** That, the Petitioner has proposed a tariff hike of 10.11 paisa per unit which is as high as 40% of the existing transmission charges. Therefore, any increase in transmission charges will invite Retail Supply Tariff increase through DISCOM for which Hon'ble Commission may take a suitable decision.

16. Interest on Loan Capital:

That, the Petitioner has claimed Rs. 240.91 Cr towards interest on Loan which is 100% increase over FY 2025-26 approved amount of Rs. 120.37 Cr (the actual for FY 2023-24 was Rs. 120.96 Cr as per Table-8 of the order dated 24.03.2025, and actual for FY 2024-25 is Rs. 131.38 Cr as per Table-30 of the instant petition filed by the applicant).

17. That, the opening balance of loan as on 1.04.2024 was Rs. 2006.17 Cr (Table-41 of order dated 24.03.2025) which has increased to Rs. 4193.55 Cr as on 01.04.2026 (as submitted by the applicant at Table-10 of the petition).Such huge increase may kindly be explained.

18. Further, the petitioner itself has computed the normative interest at Rs. 130.22 Cr at page -23 of the instant petition ,relevant extract of which is produced below.

*Further, as per **Regulation 8.24 of OERC Regulations, 2014**, the interest on any capital loan (including normative loan) shall be calculated at the weighted-average interest rate of the actual loan portfolio at the beginning of each financial year.*

*Applying the derived weighted-average interest rate of 8.10 %, the normative interest amount works out to **₹ 130.22 Cr**. Accordingly, OPTCL is eligible to claim this amount as interest on normative loan.*

The Central Odisha Distribution Ltd. TPCODL BBSR

19. In view of the above, the Hon'ble Commission may kindly allow the interest on loan based on applicable regulatory frameworks after prudence check.

Prayers:

I. It is prayed before the Hon'ble Commission to kindly consider the submission made by TPCODL while approving the instant application of the Petitioner.

II. The Hon'ble Commission may carry out prudence check of the ARR and True up petition of the Petitioner and take appropriate decision in this matter.

III. The Hon'ble Commission may kindly ensure no pre-vesting period liabilities/claims/expenditures are passed on to the new Discoms in accordance with the letter and spirit of Electricity Act, 2003,Vesting Order and other applicable regulatory frameworks.

IV. The Hon'ble Commission may like to consider our proposal as mentioned in this submission and balance out the ARR so that interest of all the stakeholders are safeguarded.

V. The Hon'ble Commission may kindly allow us to make additional submission in this matter.

VI. The Hon'ble Commission may kindly consider to condone any inadvertent omission/ errors/ short comings/ delays and allow to make further submission as may be required at a future date to support this application in terms of modification/clarification if any.

Bharat Kumar Bhadawat
Chief-Regulatory & Legal

TP Central Odisha Distribution Ltd. TPCODL *BBSR*

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
PLOT NO. 4, SAILESHREE VIHAR,
CHANDRASEKHARPUR, BHUBANESWAR-751021

CASE NO. 121/2025
FILING NO. 3

IN THE MATTER OF: (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

And

(ii) Truing up application for FY 2024-25 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

AND
IN THE MATTER OF: Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

..... Applicant

vrs

TP Central Odisha Distribution Limited and **15 others.**

..... Objectors

Rejoinder to the objections raised by the Objector TP **Central Odisha Distribution Limited (TPCODL).**

The humble applicant above named
MOST RESPECTFULLY SHEWETH:

1. The answering Applicant denies all allegations, averments and submissions contained in the reply filed on behalf of TP Central Odisha Distribution Limited (TPCODL) which are contrary to or inconsistent with the record and / or what is stated hereinafter. Instead of giving a Para-wise Rejoinder, it is submitted as under:

2. Vide affidavit dated 16.01.2026, TPCODL has raised certain objections on ARR & Transmission Tariff Application of OPTCL for FY 2026-27 and Truing up application for FY 2024-25.

2. M/s. Odisha Power Transmission Corporation Limited, Bhubaneswar (in short OPTCL) undertakes Intra State transmission business in the state of Odisha. It has been notified as the State Transmission Utility (STU) U/s 39(1) of the Electricity, 2003.

3. Being the STU as well as a Transmission licensee, OPTCL is primarily responsible for transmitting electricity from power generation companies to the distribution companies within the State. The transmission infrastructures have been created based on the requirement / recommendation of Distribution Companies considering following components mainly:-

- To provide the power supply to upcoming Industrial hub.
- To strengthen the Inter State Power connectivity for import / export of power.
- To improve the voltage profile in the low voltage area/pockets.
- To provide un-interrupted power to the EHT, HT and LT Consumers of the state
- Availability of alternate power supply and also meet the N-1 Transmission planning criteria
- To improve the system availability, reliability & quality of the power supply.
- To meet the future load growth.
- To improve socio economic status of peripheral inhabitants.
- To reduce Transmission Losses.

4. It may be noted that OPTCL has been consistently maintaining system availability at around 99.98% which is more than the normative system availability of 98.50%.

5. Except NALCO & IMFA, all the open access customers are the consumers of Distribution Companies. Therefore, the consumers of Odisha are the ultimate beneficiaries of all the transmission infrastructure created by OPTCL.

6. OPTCL has adopted the principles enunciated in the Transmission Tariff Regulations, 2014 for proposing the different components of ARR for FY 2026-27 in the present

application. Except return on equity, all the components allowed in the ARR are subject to truing up, which are carried out on the basis of actual expenses booked in the Audited books of Accounts of OPTCL. Considering the requirement for expenses on operation and maintenance, debt service obligation and other expenditure as per the provision stipulated in the Regulations, 2014, the transmission tariff is projected with justifications.

7. In the regulatory process all the controllable/uncontrollable cost incurred by licensee needs to be recovered through tariff so as to make it cost effective without burdening the future consumers. It is obligatory for the transmission licensee (STU) to conduct its operation within the amount approved by the Commission. Also, it caters to the growing demand of the state at optimal cost. Being the transmission licensee, OPTCL endeavors to control its expenditure on different heads to the maximum possible extent. It may be pertinent to mention that projection has been made based on the actual expenditure incurred in 1st half of FY 2025-26 along with the likely expenditure to be incurred in FY 2026-27.

8. Due to impact of inflationary effect, the increase in cost is quite inevitable which needs to be considered in the transmission tariff process by the Hon'ble Commission. It is pertinent to mention that the STU charges in the state are comparably low with respect to CTU charges and STU charges of other states.

9. Para 1 to 9 are the matters of record.

10. Para10: In the last year Tariff Order, Hon'ble Commission has observed that the health of transmission assets is vital for smooth and reliable operation of transmission system assets. The Commission therefore desires that, OPTCL should incur R&M expenses exclusively for condition-based maintenance of transmission assets for improving reliability and availability of equipment & material associated with the transmission system for smooth and trouble-free operation of the system. The large increase in OPTCL's assets based, substations and lines reasonably justifies the rise in O&M expenditure . Deferred maintenance in a transmission system leads to outage, safety hazards and system failure which are ultimately costlier for the State. Effective O&M also ensures required quantum of power for adequate recovery of revenue.

It may be noted that the major R&M works are being carried out usually during working season i.e. from January to March of every year. OPTCL has planned for additional R&M expenditure apart from the usual trend towards the following,

Nayak Custom Bank

Renovation works like re-metaling, fencing works, illumination, repairing of approach roads & boundaries, Earth pit maintenance & provision of contour & tripod earthing, provision of mandatory spares for AIS/GIS substations, provision of Binoculars/High beam torch lights for Grid Substations, provision of common entry gate for all GSSs, replacement of OIP bushings with RIP bushings & replacement of porcelain LA with Polymer LA near transformers, strengthening of LA earthing & provision of LA monitors, Control room building & store maintenance, Cable trench & drainage system maintenance etc. of old grid substations, renovation works of EHT lines like revetment, recouping, putting tower footing earthing resistance, provision of TLAs (Transmission Lighting Arrestor), replacement of DISC insulators at all Road crossing and all tension points, replacement of multi-midspan joints & rectification of lines with intermittent PG clamps, tower painting, jumper replacement, stub repairing, AI based line patrolling, maintaining statutory clearance (with interposing towers) and miscellaneous works like provision of firefighting system for transformers, AMC for SAS, GPS based synchronizing equipment, cranes & lifts etc, Sanitation, reconditioning of 20MVA, 40MVA & 100MVA power transformers, Inspection Fees, procurement of Safety shoe, jacket, harness, helmet etc., Engagement of Security personnel and Jhulla & Tower Climbers, procurement of towers/structures/hardware fittings, Power & Control cables and Battery & chargers, Replacement of old ACDB & DCDB, Repair & replacement of old testing equipment, procurement of T&P materials.

It is pertinent to mention that statutory payments such as salaries of security personnel, Jhula and tower climbers, inspection fees, etc., are incurred on a regular monthly basis. However, expenditure towards grid and line maintenance works is generally booked towards the end of the financial year based on the bills submitted, i.e., after completion of the respective works during the working season. Consequently, R&M expenditure remains relatively low during the first nine months of the year, whereas nearly 40% of the total expenditure is accounted for during the last three months. As of December 2025, about ₹140 crore has been incurred towards R&M works, and for the full financial year, the total expenditure is expected to be ₹199 crore. Accordingly, OPTCL projected Rs. 259.65 Cr. towards Repair & maintenance which is well within the regulatory limit of Rs. 251.50 Cr. (i.e. 2.50% of GFA as on 31.03.2025). Hon'ble Commission is hereby requested to consider the proposal OPTCL and allow Rs.259.65 Cr. towards Repair & Maintenance Expenses (R&M).

13. **Para 11 & 12:** Regulation 8.27 of OERC Regulations, 2014 stipulate that the Return on Equity (RoE) shall be computed in rupee terms, on the equity base determined in according with regulations 4.8 to 4.22 and regulation 8.17 to 8.24. Further, as per the Regulations 8.28 & 8.29 STU (OPTCL) shall be allowed a Return on Equity Capital in rupee terms at the rate of 15.5% per annum (post tax), on the amount of equity capital base as determined by the Commission. This rate of return needs to be grossed up with the normal/applicable tax rate. Further, the maximum equity allowable for ROE as per the regulation is 30% of the Capital Cost (GFA). The "Book value of own Assets as on 31.03.2026 (on which depreciation will be calculated) is **Rs. 6002.32 cr.**. Considering the above, OPTCL has projected the ROE of Rs. 279.11 Cr. @ 15.5% of equity base of Rs. 1800.696 Cr. (i.e. 30% of the GFA: – Rs. 6002.32 Cr. as on 31.03.2026). Hon'ble Commission is hereby requested to consider the proposal of OPTCL and allow Rs.279.11 Cr. towards Return on Equity (RoE). Assets valuing ₹528.41 crore were added during FY 2024–25. Further, it is estimated that assets valuing ₹1163.72 crore will be added during FY 2025–26. The details are provided in Form F-2 of the application.

14. **Para 13:** Regulation 8.44 of OERC Regulations, 2014 stipulates that "the **actual assessment** of income tax should take into account benefits of tax holidays and the credit for carry forward losses applicable as per the provisions of the Income Tax, Act 1961 shall be passed on to the consumers". In this regard, it is submitted that OPTCL has paid income tax amounting to ₹28.56 Cr. for the AY 2025-26. The same amount of ₹28.56 Cr. is proposed for FY 2026-27. However, differences if any, as per the Regulation 8.43 and 8.44, shall be adjusted during the true up exercise based on audited accounts.

15. **Para 14:** OPTCL has filed the trueing up application as per the Regulation 7.1 (Truing up of Capital Expenditure and Tariff) of OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 . Hon'ble Commission is hereby requested to consider the deficit ₹53.07 Cr. in truing up for the FY 2024-25.

16. **Para 16 to 19 :**

The details of loans amounting to ₹4,239.55 crore as on 31.03.2026 have already been explained in Table-10 and Form-13. All loans availed or proposed to be availed are project-specific. Recently, OPTCL has signed a loan agreement with

NABARD amounting to ₹899.99 crore. The Hon'ble Commission is requested to consider interest on loan capital amounting to ₹240.91 crore.

17. The Transmission infrastructures are created considering the demand and request of the DISCOMs from time to time, after due approval form the Hon'ble OERC through Transmission Plan. Being a Transmission License, OPTCL has always endeavored to create the Transmission infrastructure for providing reliable and quality power to the consumers of DISCOMs. Accordingly, every year OPTCL is adding more transmission assets to meet the requirement of DISCOMs. Therefore, the ARR of OPTCL will be on an increasing trend in comparison to the previous year and OPTCL is entitled to recover its ARR fully from the DISCOMs. It is anticipated that the demand of DISCOMs (in MU) will increase proportionately with respect to addition of Infrastructure in the coming years.

17. OPTCL has proposed to recover ARR amount of Rs. 1490.05 Cr. from LTOA customers including DISCOMs. It is proposed that Rs. 1376.81 Cr. to be recovered from DISCOMs for transmission of 38663.46 MU energy @ 35.61 P / kwh as transmission charges as detailed below:-

SL No	DISCOMS	Energy Projected (MU)	Less:- Drawal in 33 & 11 Kv	Net Projected energy (MU)	Proposed rate@ p/u	Rs in Cr.
1	TPCODI	13248	32.00	13216	35.61	470.62
2	TPWOD	11952	324.00	11628	35.61	414.07
3	TPNODI	8853.46	31.00	8822.46	35.61	314.17
4	TPSODI	5050	53.00	4997	35.61	177.94
	TOTAL	**39103.46**	**440.00**	**38663.46**		**1376.81**

The quantum of energy projections were made based on the information received from DISCOMs.

18. The ARR projection of Rs.1490.05 Cr. for FY 2026-27 is increased by 6.53% over the projection of FY 2025-26. Transmission charge is arrived at 35.61 paise per unit by dividing the total ARR of OPTCL with the recent realistic MU projections of

DISCOMs and recovered from them on a monthly basis. This rate will decrease if DISCOMs drawal increase.

19. Hence, mere apprehension of TPCODL towards imposition of excessive burden on Discoms seems to be inappropriate and unacceptable which is likely to be rejected at this juncture. Moreover, the contention of the stake holder operating in the value chain of electricity needs to appreciate the fact that the cost recovery has to be in full so as to make the sector sustainable.

20. Anything not specifically admitted or dealt with shall be deemed to have been denied. The answering Applicant craves leave and reserves its rights to make further submissions at the time of hearing. The objections not specifically admitted may be deemed to have been denied.

PRAYER

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of TPCODL while approving ARR and Transmission Tariff of OPTCL for FY 2026-27 & Truing up application for the FY 2024-25.

By the Applicant

Through

Bhubaneswar

January 27, 2026

Sr. GM (El.), RT&C

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
PLOT NO.4, CHUNUKOLI, SAILASHREE VIHAR,
BHUBANESWAR

Case No. 121/2025

IN THE MATTER OF: (i) Application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

And

(ii) Truing up application for FY 2024-25 in compliance with the Regulation 7 of the OERC (Terms and conditions for Determination of Transmission Tariff) Regulations, 2014.

IN THE MATTER OF: Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

---------Petitioner

And

IN THE MATTER OF: TP Northern Odisha Distribution Limited (TPNODL), Corporate Office-Januganj, Balasore-756019.

-------Respondent

Affidavit verifying the submission of TPNODL

I, Sri Pratap Kumar Mohanty, aged about 59 years, S/o. late Gyanendra Prasad Mohanty working as the Sr. GM (Risk, Regulatory & Legal), do hereby solemnly affirm and state as follows:

1. That, I am authorized representative of the TPNODL, the Respondent in the instant case and competent to swear this affidavit for and on behalf of TPNODL.
2. That, I have gone through the contentions in this submission and understood the contents thereof.
3. That, the facts stated in the submission are true to the best of my knowledge and belief.

Pratap Kumar Mohanty

Date: 15.01.2026

DEPONENT

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
PLOT NO.4, CHUNUKOLI, SAILASHREE VIHAR,
BHUBANESWAR

Case No. 121/2025

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IN THE MATTER OF: Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

---------Petitioner

And

IN THE MATTER OF: TP Northern Odisha Distribution Limited (TPNODL), Corporate Office-Januganj, Balasore-756019.

-------Respondent

TPNODL, the above named respondent, most respectfully showeth :

1. That, TP Northern Odisha Distribution Limited (TPNODL), the respondent has taken over the distribution business from erstwhile NESCO utility w.e.f. 01.04.2021 as per the terms of the Order dated 25.03.2021 (hereinafter referred to as "Vesting Order"). TPNODL is a joint venture between Tata Power Company Ltd. (TPCL) and the Government of Odisha (GoO) with equity participation of 51% by TPCL and balance 49% with GoO represented through GRIDCO.

2. That, the Respondent is the distribution licensee as per license condition dt. 01.04.2021 of the Hon'ble Commission and distributes Electricity in northern part of Odisha having 5 revenue districts namely Balasore, Mayurbhanj, Bhadrak, Keonjhar and Jajpur with around 27,857 Sq Km area of operation.

Pratap Kumar Mohanty

3. That, the respondent DISCOM is required to "supply electricity" in accordance with the provisions as laid down under section 42 of the Electricity Act, 2003 which provides for duties of the Distribution Licensee.

4. That, as per the mandate of vesting order, the respondent is procuring power from the applicant, who is the State designated entity to procure power for all the 4 distribution DISCOM(S) from different generators like thermal, hydel renewable etc. located in and outside Odisha.

5. That, the Applicant is also a Deemed Transmission Licensee under Section 14 of the Electricity Act, 2003.

6. That, the Petitioner (M/s OPTCL) has filed the Aggregated Revenue Requirement & Transmission Tariff for FY 2026-27 and True Up for FY 2024-25 with following prayers.

   a. Approval of Aggregate Revenue Requirement of Rs. 1765.40 Cr.

   b. Recovery of Transmission Charge @ Rs.8545.00 /MW-Day i.e. 35.61 Paise/unit.

   c. Transmission Loss for FY 2026-27 as 3.05% on energy drawal.

   d. Truing up exercise for the FY 2024-25 and consider the deficit amount of Rs. 53.07 Cr

7. That, the Respondent DISCOM herewith submits its response/views to the ARR & True Up application of OPTCL as under:

Submission of TPNODL

8. That, the revenue requirement projected by the Petitioner for the FY 2026-27 is about 45% more than that approved for the FY 2025-26. The comparative figures of components of ARR are given in the table below:

NOTARY GOVT. OF ODISHA (INDIA) J.M. BEHERA BALASORE

Pratap Kumar Mohanty

ITEMS	OERC Approval		Increase in approved FY 25-26 over approved FY 24-25	Proposal for OPTCL	Increase in proposed FY 26-27 over approved FY 25-26
	FY 2025-26	FY 2024-25		FY 2026-27	
A) FIXED COST	**Rs. Cr**	**Rs. Cr**	**Rs. Cr**	**Rs. Cr**	**Rs. Cr**
1. O&M Expenses	**695.93**	**661.03**	**5.01%**	**838.47**	**20%**
(i) Employees Cost including Terminal Benefits	493.12	488.63	0.91%	531.52	8%
(ii) A&G Cost	42.46	37.05	15%	46.95	11%
(iii) R&M Cost	160	135	19%	259.65	62%
(iv) Expenses related to auxiliary energy consumption	0	0		0	
(v) Other misc. expenses, statutory levies and taxes (GCC)	0.35	0.35	0%	0.35	0%
2. Interest & Financial Charges	**140.54**	**151.8**	**-7%**	**268.44**	**91%**
(i) Interest on Loan Capital	120.37	133.95	-10%	240.91	100%
(ii) Interest on Working Capital		0		0	
(iii) Rebate	20.17	17.85	13%	27.53	36%
(iv) Incentive as per OREP-2022		2.31		0	
3. Depreciation & amortization expense	**284.33**	**275.67**	**3%**	**337.09**	**19%**
4. Return on Equity	**194.45**	**162.14**	**20%**	**279.11**	**44%**
5. Income Tax	**10.77**	**7**	**54%**	**28.56**	**165%**
Sub-Total (A)	**1,326.02**	**1,257.64**	**5%**	**1,751.67**	**32%**
B) Others					
Incentive for system availability	5	5	0%	**13.73**	175%
Total Trans. Cost (A+B)	**1,331.02**	**1,262.64**	**5%**	**1,765.40**	**33%**
C) Less Misc. Receipts	**306.42**	**302.75**	1%	**275.35**	-10%
D) Less: Regulatory Surplus	**0**	**48.5**	-100%		
E) ARR to be recovered from LTOA Customers i.e. **OPTCL's Aggregate Revenue Requirement**	**1,024.60**	**911.39**	**12%**	**1,490.05**	**45%**

9. That, the Truing Up proposed by the Petitioner for FY 2024-25 is showing Rs. 53.07 Cr. deficit.

Particulars	OERC Approval	Actual as per Audited Accounts	Truing Up	Surplus/ (Deficit)
A. Employee Cost (Net)	488.63	473.39	473.39	15.24
B. R&M Cost	135	149.01	149.01	-14.01
C. A&G Cost (Including SLDC & GCC)	37.05	44.76	41.6	-4.55
Sub-Total (A+B+C)	**660.68**	**667.16**	**664**	**-3.32**

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D. Depreciation	275.67	408.91	269.89	5.78
E. Interest on Long-term liability	133.95	131.38	131.38	2.57
F. Rebate	20.16	15.93	15.93	4.23
G. Incentive for system availability	5	5	13.73	-8.73
H. GCC Expenses	0.35			0.35
Sub-Total (A to H)	**1095.81**	**1228.38**	**1094.93**	**0.88**
I. Return on Equity	162.14		173.12	-10.98
J. Income Tax	7		28.56	-21.56
Grand Total (A to J)	**1264.95**	**1228.38**	**1296.61**	**-31.66**
Less: Inter-state wheeling & Misc. Revenue	302.75	347.51	347.51	-44.76
Less: Regulatory Surplus	48.5			48.5
Net Transmission Cost	**913.7**	**880.87**	**949.1**	**-35.4**
Revenue from Transmission Charges	913.76	896.09	896.09	17.67
Difference to be allowed in truing up (FY 2024-25)	**0.06**	**15.22**	**-53.01**	**53.07**

10. R&M Cost:

That, the Petitioner has proposed 62% higher as compared to previous year ARR approved by the Hon'ble Commission under R&M Expenses. It may be noted that in truing up, the actual expenses for FY 2024-25 has come to Rs. 149.01 Cr. against approved amount of Rs. 135 Cr. Further, the actual expenses till Sep-25 is Rs. 75.13 Cr and current year estimation is Rs 154 Cr against which ensuing year proposed amount is Rs. 259.65 Cr. For this, the Petitioner has provided a list of items which needs to be replaced, repaired and maintained. Therefore, Hon'ble Commission is requested to approve the R&M expenses based actual asset base and prudence check.

11. Return on Equity:

That, the Petitioner has proposed a Return on Equity (RoE) for FY 2026–27 (15.5% of 30% on GFA of Rs. 6002.32 Cr) which is about 44% higher than the RoE approved for the previous year, whereas under the Transmission Tariff Regulations, RoE is allowable at 15.5% per annum only on the equity base approved by the Hon'ble Commission. It is submitted that the Hon'ble Commission, in its Tariff Order dated 24.03.2025 in Case No. 93 of 2024, had approved an equity base of Rs. 1078.17 Cr. as on 31.03.2024 (para 171 of order dated 24.03.2025)

171. Further, the Government of Odisha specifically in its letter No.3333 dated 24.03.2021 had communicated to the Commission that no return on equity shall be paid on the equity of Rs.647.00 Cr., which relates to the sanction of the Government towards the conversion of bond to the equity. Excluding the aforesaid amounts of Rs.657.30 Cr. & Rs.647.00 Cr. from the total equity capital

 Pratap Kumar Mohanty

of Rs.2382.71 Cr. infused by the Government of Odisha, the Commission has considered the equity capital of Rs.1078.17 Cr. ***(i.e., Rs.2382.71 Cr. - Rs.657.30 Cr.- Rs.647.00 Cr.) as on 31.03.2024****. Further, the Commission had considered Rs.995.93 Cr. equity capital as on 31.03.2023 in the truing-up order for the FY 2022-23.*

Therefore, the Commission has evaluated the average equity capital of Rs.1037.17 Cr.{(Rs.995.93 Cr. + Rs.1078.17 Cr.)/2} for the FY 2023-24 and accordingly, approvesRs.160.76 Cr. (i.e. @15.5% of Rs.1037.17 Cr.) towards Return on Equity in this truing up for the FY 2023-24 against Rs.140.42 Cr. approved in the Transmission tariff Order of FY 2023-24.

(Emphasis Supplied)

12. That, the Petitioner may kindly justify such huge increase in equity capital in 2 years (i.e. from 1037.17 Cr as on 31.03.2024 to Rs. 1800.696 Cr (i.e. 30% of Rs. 6002.32 Cr) as on 31.03.2026 and may also confirm if the adjustment of Rs. 647 Cr and Rs. 657 Cr (as done at para 171 of the Order dated 24.03.2025) has been incorporated or not.

13. **Income Tax**: That, the Petitioner has proposed 165% higher as compared to previous year ARR approved by the Hon'ble Commission under Income Tax. The Hon'ble Commission may take a suitable decision while approving the Income Tax expenses subject to actual payment which will be verified during truing up exercise of that year.

14. **Deficit:** That, the Petitioner has proposed a deficit of Rs. 53.07 Cr. under truing up application for FY 2024-25. From the Transmission Tariff Order dated 24.03.2025 it is observed that the Hon'ble Commission has approved the truing up till FY 23-24 wherein the cumulative surplus is Rs 80.57 Cr. Therefore, having cumulative available surplus, Hon'ble Commission may take a prudence check and approve the truing up for FY 24-25.

15. **Tariff Hike:** That, the Petitioner has proposed a tariff hike of 10.11 paisa per unit which is as high as 40% of the existing transmission charges. Therefore, any increase in transmission charges will invite Retail Supply Tariff increase through DISCOM for which Hon'ble Commission may take a suitable decision.

Pratap Kumar Mohanty

16. Interest on Loan Capital:

That, the Petitioner has claimed Rs. 240.91 Cr towards interest on Loan which is 100% increase over FY 2025-26 approved amount of Rs. 120.37 Cr (the actual for FY 2023-24 was Rs. 120.96 Cr as per Table-8 of the order dated 24.03.2025, and actual for FY 2024-25 is Rs. 131.38 Cr as per Table-30 of the instant petition filed by the applicant).

17. That, the opening balance of loan as on 1.04.2024 was Rs. 2006.17 Cr (Table-41 of order dated 24.03.2025) which has increased to Rs. 4193.55 Cr as on 01.04.2026 (as submitted by the applicant at Table-10 of the petition). Such huge increase may kindly be explained.

18. Further, the petitioner itself has computed the normative interest at Rs. 130.22 Cr at page -23 of the instant petition, relevant extract of which is produced below.

*Further, as per **Regulation 8.24 of OERC Regulations, 2014**, the interest on any capital loan (including normative loan) shall be calculated at the weighted-average interest rate of the actual loan portfolio at the beginning of each financial year.*

*Applying the derived weighted-average interest rate of 8.10 %, the normative interest amount works out to **₹ 130.22 Cr**. Accordingly, OPTCL is eligible to claim this amount as interest on normative loan.*

19. In view of the above, the Hon'ble Commission may kindly allow the interest on loan based on applicable regulatory frameworks after prudence check.

Pratap kumar mohanty

Prayers:

I. It is prayed before the Hon'ble Commission to kindly consider the submission made by TPNODL while approving the instant application of the Petitioner.

II. The Hon'ble Commission may carry out prudence check of the ARR and True up petition of the Petitioner and take appropriate decision in this matter.

III. The Hon'ble Commission may kindly ensure no pre-vesting period liabilities/claims/expenditures are passed on to the new Discoms in accordance with the letter and spirit of Electricity Act, 2003, Vesting Order and other applicable regulatory frameworks.

IV. The Hon'ble Commission may like to consider our proposal as mentioned in this submission and balance out the ARR so that interest of all the stakeholders are safeguarded.

V. The Hon'ble Commission may kindly allow us to make additional submission in this matter.

VI. The Hon'ble Commission may kindly consider to condone any inadvertent omission/ errors/ short comings/ delays and allow to make further submission as may be required at a future date to support this application in terms of modification/clarification if any.

Place: Balasore
Date: 15.01.2026

Pratap Kumar Mohanty

Respondent

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
PLOT NO. 4, SAILESHREE VIHAR,
CHANDRASEKHARPUR, BHUBANESWAR-751021

CASE NO. 121/2025
FILING NO. 3

IN THE MATTER OF: (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

And

(ii) Truing up application for the FY 2024-25 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

AND
IN THE MATTER OF: Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

..... Applicant

vrs

TP Northern Odisha Distribution Limited and **16 others.**

..... Objectors

Rejoinder to the objections raised by the Objector TP **Western Odisha Distribution Limited (TPNODL).**

The humble applicant above named
MOST RESPECTFULLY SHEWETH:

1. The answering Applicant denies all allegations, averments and submissions contained in the reply filed on behalf of TP Northern Odisha Distribution Limited (TPNODL) which are contrary to or inconsistent with the record and / or what is stated hereinafter. Instead of giving a Para-wise Rejoinder, it is submitted as under:

2. Vide affidavit dated 16.01.2026, TPNODL has raised certain objections on ARR & Transmission Tariff Application of OPTCL for FY 2026-27 and Truing up application for FY 2024-25.

2. M/s. Odisha Power Transmission Corporation Limited, Bhubaneswar (in short OPTCL) undertakes Intra State transmission business in the state of Odisha. It has been notified as the State Transmission Utility (STU) U/s 39(1) of the Electricity, 2003.

3. Being the STU as well as a Transmission licensee, OPTCL is primarily responsible for transmitting electricity from power generation companies to the distribution companies within the State. The transmission infrastructures have been created based on the requirement / recommendation of Distribution Companies considering following components mainly:-

- To provide the power supply to upcoming Industrial hub.
- To strengthen the Inter State Power connectivity for import / export of power.
- To improve the voltage profile in the low voltage area/pockets.
- To provide un-interrupted power to the EHT, HT and LT Consumers of the state
- Availability of alternate power supply and also meet the N-1 Transmission planning criteria
- To improve the system availability, reliability & quality of the power supply.
- To meet the future load growth.
- To improve socio economic status of peripheral inhabitants.
- To reduce Transmission Losses.

4. It may be noted that OPTCL has been consistently maintaining system availability at around 99.98% which is more than the normative system availability of 98.50%.

5. Except NALCO & IMFA, all the open access customers are the consumers of Distribution Companies. Therefore, the consumers of Odisha are the ultimate beneficiaries of all the transmission infrastructure created by OPTCL.

6. OPTCL has adopted the principles enunciated in the Transmission Tariff Regulations, 2014 for proposing the different components of ARR for FY 2026-27 in the present application. Except return on equity, all the components allowed in the ARR are subject to truing up, which are carried out on the basis of actual expenses booked in the Audited books of Accounts of OPTCL. Considering the requirement for expenses

on operation and maintenance, debt service obligation and other expenditure as per the provision stipulated in the Regulations, 2014, the transmission tariff is projected with justifications.

7. In the regulatory process all the controllable/uncontrollable cost incurred by licensee needs to be recovered through tariff so as to make it cost effective without burdening the future consumers. It is obligatory for the transmission licensee (STU) to conduct its operation within the amount approved by the Commission. Also, it caters to the growing demand of the state at optimal cost. Being the transmission licensee, OPTCL endeavors to control its expenditure on different heads to the maximum possible extent. It may be pertinent to mention that projection has been made based on the actual expenditure incurred in 1st half of FY 2025-26 along with the likely expenditure to be incurred in FY 2026-27.

8. Due to impact of inflationary effect, the increase in cost is quite inevitable which needs to be considered in the transmission tariff process by the Hon'ble Commission. It is pertinent to mention that the STU charges in the state are comparably low with respect to CTU charges and STU charges of other states.

9. Para 1 to 9 are the matters of record.

10. Para10: In the last year Tariff Order, Hon'ble Commission has observed that the health of transmission assets is vital for smooth and reliable operation of transmission system assets. The Commission therefore desires that, OPTCL should incur R&M expenses exclusively for condition-based maintenance of transmission assets for improving reliability and availability of equipment & material associated with the transmission system for smooth and trouble-free operation of the system. The large increase in OPTCL's assets based, substations and lines reasonably justifies the rise in O&M expenditure . Deferred maintenance in a transmission system leads to outage, safety hazards and system failure which are ultimately costlier for the State. Effective O&M also ensures required quantum of power for adequate recovery of revenue.

It may be noted that the major R&M works are being carried out usually during working season i.e. from January to March of every year. OPTCL has planned for additional R&M expenditure apart from the usual trend towards the following, Renovation works like re-metaling, fencing works, illumination, repairing of approach roads & boundaries, Earth pit maintenance & provision of contour & tripod earthing, provision of mandatory spares for AIS/GIS substations, provision of Binoculars/High

beam torch lights for Grid Substations, provision of common entry gate for all GSSs, replacement of OIP bushings with RIP bushings & replacement of porcelain LA with Polymer LA near transformers, strengthening of LA earthing & provision of LA monitors, Control room building & store maintenance, Cable trench & drainage system maintenance etc. of old grid substations, renovation works of EHT lines like revetment, recouping, putting tower footing earthing resistance, provision of TLAs (Transmission Lighting Arrestor), replacement of DISC insulators at all Road crossing and all tension points, replacement of multi-midspan joints & rectification of lines with intermittent PG clamps, tower painting, jumper replacement, stub repairing, AI based line patrolling, maintaining statutory clearance (with interposing towers) and miscellaneous works like provision of firefighting system for transformers, AMC for SAS, GPS based synchronizing equipment, cranes & lifts etc, Sanitation, reconditioning of 20MVA, 40MVA & 100MVA power transformers, Inspection Fees, procurement of Safety shoe, jacket, harness, helmet etc., Engagement of Security personnel and Jhulla & Tower Climbers, procurement of towers/structures/hardware fittings, Power & Control cables and Battery & chargers, Replacement of old ACDB & DCDB, Repair & replacement of old testing equipment, procurement of T&P materials.

It is pertinent to mention that statutory payments such as salaries of security personnel, Jhula and tower climbers, inspection fees, etc., are incurred on a regular monthly basis. However, expenditure towards grid and line maintenance works is generally booked towards the end of the financial year based on the bills submitted, i.e., after completion of the respective works during the working season. Consequently, R&M expenditure remains relatively low during the first nine months of the year, whereas nearly 40% of the total expenditure is accounted for during the last three months. As of December 2025, about ₹140 crore has been incurred towards R&M works, and for the full financial year, the total expenditure is expected to be ₹199 crore. Accordingly, OPTCL projected Rs. 259.65 Cr. towards Repair & maintenance which is well within the regulatory limit of Rs. 251.50 Cr. (i.e. 2.50% of GFA as on 31.03.2025). Hon'ble Commission is hereby requested to consider the proposal OPTCL and allow Rs.259.65 Cr. towards Repair & Maintenance Expenses (R&M).

13. **Para 11 & 12:** Regulation 8.27 of OERC Regulations, 2014 stipulate that the Return on Equity (RoE) shall be computed in rupee terms, on the equity base determined in according with regulations 4.8 to 4.22 and regulation 8.17 to 8.24. Further, as per the Regulations 8.28 & 8.29 STU (OPTCL) shall be allowed a Return on Equity Capital in rupee terms at the rate of 15.5% per annum (post tax), on the amount of equity capital base as determined by the Commission. This rate of return needs to be grossed up with the normal/applicable tax rate. Further, the maximum equity allowable for ROE as per the regulation is 30% of the Capital Cost (GFA). The "Book value of own Assets as on 31.03.2026 (on which depreciation will be calculated) is **Rs. 6002.32 cr.**. Considering the above, OPTCL has projected the ROE of Rs. 279.11 Cr. @ 15.5% of equity base of Rs. 1800.696 Cr. (i.e. 30% of the GFA: – Rs. 6002.32 Cr. as on 31.03.2026). Hon'ble Commission is hereby requested to consider the proposal of OPTCL and allow Rs.279.11 Cr. towards Return on Equity (RoE). Assets valuing ₹528.41 crore were added during FY 2024–25. Further, it is estimated that assets valuing ₹1163.72 crore will be added during FY 2025–26. The details are provided in Form F-2 of the application.

14. **Para 13:** Regulation 8.44 of OERC Regulations, 2014 stipulates that "the **actual assessment** of income tax should take into account benefits of tax holidays and the credit for carry forward losses applicable as per the provisions of the Income Tax, Act 1961 shall be passed on to the consumers". In this regard, it is submitted that OPTCL has paid income tax amounting to ₹28.56 Cr. for the AY 2025-26. The same amount of ₹28.56 Cr. is proposed for FY 2026-27. However, differences if any, as per the Regulation 8.43 and 8.44, shall be adjusted during the true up exercise based on audited accounts.

15. **Para 14:** OPTCL has filed the trueing up application as per the Regulation 7.1 (Truing up of Capital Expenditure and Tariff) of OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 . Hon'ble Commission is hereby requested to consider the deficit ₹53.07 Cr. in truing up for the FY 2024-25.

16. **Para 16 to 19 :**

The details of loans amounting to ₹4,239.55 crore as on 31.03.2026 have already been explained in Table-10 and Form-13. All loans availed or proposed to be availed are project-specific. Recently, OPTCL has signed a loan agreement with NABARD amounting to ₹899.99 crore. The Hon'ble Commission is requested to consider interest on loan capital amounting to ₹240.91 crore.

Nabs Utkal Bank

17. The Transmission infrastructures are created considering the demand and request of the DISCOMs from time to time, after due approval form the Hon'ble OERC through Transmission Plan. Being a Transmission License, OPTCL has always endeavored to create the Transmission infrastructure for providing reliable and quality power to the consumers of DISCOMs. Accordingly, every year OPTCL is adding more transmission assets to meet the requirement of DISCOMs. Therefore, the ARR of OPTCL will be on an increasing trend in comparison to the previous year and OPTCL is entitled to recover its ARR fully from the DISCOMs. It is anticipated that the demand of DISCOMs (in MU) will increase proportionately with respect to addition of Infrastructure in the coming years.

17. OPTCL has proposed to recover the ARR amount of Rs. 1490.05 Cr. from LTOA customers including DISCOMs. It is proposed that Rs. 1376.81 Cr. to be recovered from DISCOMs for transmission of 38663.46 MU energy @ 35.61 P / kwh as transmission charges as detailed below:-

SL No.	DISCOMS	Energy Projected (MU)	Less:- Drawal in 33 & 11 Kv	Net Projected energy (MU)	Proposed rate@ p/u	Rs in Cr.
1	TPCODL	13248	32.00	13216	35.61	470.62
2	TPWODL	11952	324.00	11628	35.61	414.07
3	TPNODL	8853.46	31.00	8822.46	35.61	314.17
4	TPSODL	5050	53.00	4997	35.61	177.94
	TOTAL	**39103.46**	**440.00**	**38663.46**		**1376.81**

The quantum of energy projections were made based on the information received from DISCOMs.

18. The ARR projection of Rs.1490.05 Cr. for FY 2026-27 is increased by 6.53% over the projection of FY 2025-26. Transmission charge is arrived at 35.61 paise per unit by dividing the total ARR of OPTCL with the recent realistic MU projections of DISCOMs and recovered from them on a monthly basis. This rate will decrease if DISCOMs drawal increase.

19. Hence, mere apprehension of TPNODL towards imposition of excessive burden on Discoms seems to be inappropriate and unacceptable which is likely to be rejected at this juncture. Moreover, the contention of the stake holder operating in the value chain of electricity needs to appreciate the fact that the cost recovery has to be in full so as to make the sector sustainable.

20. Anything not specifically admitted or dealt with shall be deemed to have been denied. The answering Applicant craves leave and reserves its rights to make further submissions at the time of hearing. The objections not specifically admitted may be deemed to have been denied.

PRAYER

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of TPNODL while approving ARR and Transmission Tariff of OPTCL for FY 2026-27 & Truing up application for the FY 2024-25.

By the Applicant
Through

Nabakishor Bariha
Sr. GM (El.), RT&C

Bhubaneswar
January 27, 2026

BEFORE THE HON'BLE
ODISHA ELECTRICITY REGULATORY COMMISSION
BIDYUT NIYAMAK BHAWAN
PLOT NO.4, CHUNOKOLI, SHAILASHREE VIHAR, CHANDRASEKHARPUR,
BHUBANESWAR-751021

Case No. 121 of 2025

In the matter of: **(i) An Application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Sections 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.**

And

(ii) Truing Up Application for FY 2024-25 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

AND

In the matter of:

No. 98 Dt. 16/1/26
Bhubaneswar Nanda
Regd. No. 101 of 2012
Notary, Sambalpur

OPTCL .... **Applicant/Petitioner**

VRS

TPWODL & Others .... **Respondent**

AFFIDAVIT

I Manoj Kumar Panda, aged about 55 years, S/o. Sri Ramesh Chandra Panda working as the Head (Regulatory Affairs & PMAG), do hereby solemnly affirm and state as follows:

1. That, I am authorized representative of the TPWODL, the Respondent in the instant case and competent to swear this affidavit for and on behalf of the licensee.
2. That, I have gone through the contentions in this application and understood the contents thereof.
3. That, the facts stated in the reply are true to the best of my knowledge & belief and are as per available records.

Respondent

Verified that the contents of the above affidavit are true and correct, no part of it is false and nothing material has been concealed therefrom.

Verified at Sambalpur on this 16 th day of January 2026.

Respondent

THE DEPONENT SOLEMNLY AFFIRMED BEFORE ME 16/1/26
Bhubaneswar Nanda
Notary, Sambalpur
Regd. No 101/12

BEFORE THE HON'BLE
ODISHA ELECTRICITY REGULATORY COMMISSION
BIDYUT NIYAMAK BHAWAN
PLOT NO.4, CHUNOKOLI, SHAILASHREE VIHAR, CHANDRASEKHARPUR,
BHUBANESWAR-751021

Case No. 121 of 2025

In the matter of: **(i) An Application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Sections 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.**

And

(ii) Truing Up Application for FY 2024-25 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

NOTARY Bhubaneswar Nanda SAMBALPUR Regd. No. 101 of 2012 Valid TILL 02/10/27 GOVT. OF ODISHA

AND

In the matter of:

OPTCL .... **Applicant/Petitioner**

VRS

TPWODL & Others .... **Respondent**

Most Respectfully Sheweth

1. That, the Respondent, has taken over the distribution business from erstwhile WESCO utility w.e.f 01.01.2021 as per terms of vesting order. TP Western Odisha Distribution Limited (TPWODL) is a joint venture between Tata Power and the Government of Odisha with equity participation of 51% by Tata Power Company Ltd.

2. That, the Respondent is the Distribution Licensee, as per License Condition dated 26.03.2021 of the Hon'ble Commission, in western part of Odisha having 09 revenue districts namely Sambalpur, Jharsuguda, Deogarh, Sundargarh, Bargarh, Bolangir, Sonepur, Kalahandi and Nuapada with area of operation of 48373 Sq.Km.

3. That, as per mandate of Vesting Order, TPWODL is procuring power from GRIDCO, who is the state designated entity to procure power for all the 4 DISCOM(s) from different generators like Thermal, Hydel, Renewable etc. At present the approved BST is Rs. 3.85/unit.

4. That, the Applicant is also a Deemed Transmission Licensee under Section 14 of the Electricity Act, 2003.

5. That, the present application bearing Case No. 121 of 2025 has been filed by the Applicant before Hon'ble Odisha Electricity Regulatory Commission on 29.11.2025 for approval of its Aggregate Revenue Requirement and determination of Transmission Tariff for the Financial Year 2026-27 along with its Truing Up application for FY 2024-25.

6. That, the proposed Transmission tariff is abnormally high and should not be permitted. This will adversely affect the RST of the DISCOMs and will be huge burden on the consumers of Odisha.

7. That, the revenue requirement projected by the applicant for the FY 2026-27 is about 45% more than that approved for the FY 2025-26. The comparative figures of components of ARR are given the table below:

NOTARY
Bhubaneswar Nanda
SAMBALPUR
Regd. No. 101 of 2012
Valid TILL
02/10/27
GOVT. OF ODISHA

ITEMS	OERC Approval		Increase in approved FY 25-26 over approved FY 24-25	Proposal for OPTCL	Increase in proposed FY 26-27 over approved FY 25-26
	FY 2025-26	FY 2024-25		FY 2026-27	
A) FIXED COST	**Rs. Cr**	**Rs. Cr**	**Rs. Cr**	**Rs. Cr**	**Rs. Cr**
1. O&M Expenses	**695.93**	**661.03**	**5.01%**	**838.47**	**20%**
(i) Employees Cost including Terminal Benefits	493.12	488.63	0.91%	531.52	8%
(ii) A&G Cost	42.46	37.05	15%	46.95	11%
(iii) R&M Cost	160	135	19%	259.65	62%
(iv) Expenses related to auxiliary energy consumption	0	0		0	
(v) Other misc. expenses, statutory levies and taxes (GCC)	0.35	0.35	0%	0.35	0%
2. Interest & Financial Charges	**140.54**	**151.8**	**-7%**	**268.44**	**91%**
(i) Interest on Loan Capital	120.37	133.95	-10%	240.91	100%
(ii) Interest on Working Capital		0		0	
(iii) Rebate	20.17	17.85	13%	27.53	36%
(iv) Incentive as per OREP-2022		2.31		0	
3. Depreciation & amortisation expense	**284.33**	**275.67**	**3%**	**337.09**	**19%**
4. Return on Equity	**194.45**	**162.14**	**20%**	**279.11**	**44%**
5. Income Tax	**10.77**	**7**	**54%**	**28.56**	**165%**
Sub-Total (A)	**1,326.02**	**1,257.64**	**5%**	**1,751.67**	**32%**
B) Others					
Incentive for system availability	5	5	0%	**13.73**	175%
Total Trans. Cost (A+B)	**1,331.02**	**1,262.64**	**5%**	**1,765.40**	**33%**
C) Less Misc. Receipts	**306.42**	**302.75**	1%	**275.35**	-10%
D) Less: Regulatory Surplus	**0**	**48.5**	-100%		
E) ARR to be recovered from LTOA Customers i.e. **OPTCL's Aggregate Revenue Requirement**	**1,024.60**	**911.39**	**12%**	**1,490.05**	**45%**

8. That, the Truing Up proposed by the Applicant for FY 2024-25 is showing Rs. 53.07 Cr. deficit.

Particulars	OERC Approval	Actual as per Audited Accounts	Truing Up	Surplus/ (Deficit)
A. Employee Cost (Net)	488.63	473.39	473.39	15.24
B. R&M Cost	135	149.01	149.01	-14.01
C. A&G Cost (Including SLDC & GCC)	37.05	44.76	41.6	-4.55
Sub-Total (A+B+C)	**660.68**	**667.16**	**664**	**-3.32**
D. Depreciation	275.67	408.91	269.89	5.78
E. Interest on Long-term liability	133.95	131.38	131.38	2.57
F. Rebate	20.16	15.93	15.93	4.23
G. Incentive for system availability	5	5	13.73	-8.73
H. GCC Expenses	0.35			0.35
Sub-Total (A to H)	**1095.81**	**1228.38**	**1094.93**	**0.88**
I. Return on Equity	162.14		173.12	-10.98
J. Income Tax	7		28.56	-21.56
Grand Total (A to J)	**1264.95**	**1228.38**	**1296.61**	**-31.66**
Less: Inter-state wheeling & Misc. Revenue	302.75	347.51	347.51	-44.76
Less: Regulatory Surplus	48.5			48.5
Net Transmission Cost	**913.7**	**880.87**	**949.1**	**-35.4**
Revenue from Transmission Charges	913.76	896.09	896.09	17.67
Difference to be allowed in truing up (FY 2024-25)	**0.06**	**15.22**	**-53.01**	**53.07**

NOTARY
Bhubaneswar Nanda
SAMBALPUR
Regd. No. 103 of 2012
Valid
02/10/25
GOVT. OF ODISHA

TPWODL Views/Suggestions:

9. That, the Applicant has proposed 8% higher as compared to previous year ARR approved by Hon'ble Commission under **Employee Expenses**. The actual expenses for FY 24-25 as per Truing Up application is Rs. 473.39 Cr. and for the current FY 2025-26 the Applicant has estimated Rs. 503.85 Cr. and Rs. 531.52 Cr for ensuing year. The Hon'ble Commission is requested to approve the employee expenses based on actuals till December-2025.

10. That, the Applicant has proposed 11% higher as compared to previous year ARR approved by the Hon'ble Commission under **A&G Expenses**. It may be noted that in truing up, the actual expenses for FY 24-25 has come to Rs. 44.76 Cr. against OERC approval of Rs. 37.05 Cr. The expenses proposed are majorly towards property related expenses, communication, professional charges, conveyance & travelling, SLDC charges, licensee fee and material related expenses. Hon'ble Commission has been approving A&G expenses as per escalation factor equal to WPI over the amount approved in the previous year. However, the Applicant has requested to consider at least 7% escalation in line with DISCOMs Tariff Regulation, 2022. Therefore, Hon'ble Commission may take a suitable decision in this regard after prudence check.

11. That, the Applicant has proposed 62% higher as compared to previous year ARR approved by the Hon'ble Commission under **R&M Expenses**. It may be noted that in truing up, the actual expenses for FY 24-25 has come to Rs. 149.01 Cr. against OERC approval of Rs. 135 Cr. Further, the actual expenses till Sep-25 is Rs. 75.13 Cr and current year estimation is Rs 154 Cr against which ensuing year proposed amount is Rs. 259.65 Cr. For this, the applicant has provided a list

of items which needs to be replaced, repaired and maintained. Therefore, Hon'ble Commission is requested to approve the R&M expenses based on actuals derived till December-2025.

12. That, the Applicant has proposed a **Return on Equity (RoE)** for FY 2026–27 which is about 44% higher than the RoE approved for the previous year, whereas under the Transmission Tariff Regulations, RoE is allowable at 15.5% per annum only on the equity base approved by the Hon'ble Commission. It is submitted that the Hon'ble Commission, in its Tariff Order dated 24.03.2025 in Case No. 93 of 2024, had approved an equity base of Rs. 1078.17 Cr., and the asset additions indicated by the Applicant do not justify the substantially higher equity base now projected, particularly in absence of actual capitalization details up to September 2025. Even assuming full materialization of the estimated capitalization, the equity base for RoE would be limited., corresponding to a RoE of about Rs. 279.11 Cr., and as per the methodology consistently adopted by the Hon'ble Commission in earlier tariff orders, the revised equity base has to be worked out. That, in terms of the above, the Hon'ble Commission is requested to compute the RoE based on the approved equity base and allow the same to the Applicant after due prudence check.

13. That, the Applicant has proposed 165% higher as compared to previous year ARR approved by the Hon'ble Commission under **Income Tax**. The Hon'ble Commission may take a suitable decision while approving the Income Tax expenses subject to actual payment which will be verified during truing up exercise of that year.

14. That, the Applicant has proposed a deficit of Rs. 53.07 Cr. under truing up application for FY 24-25. From the Transmission Tariff Order dated 24.03.2025 it is observed that the Hon'ble Commission has approved the truing up till FY 23-24 wherein the cumulative surplus is Rs 80.57 Cr. Therefore, having cumulative available surplus, Hon'ble Commission may take a prudence check and approve the truing up for FY 24-25.

15. That, the applicant has proposed a tariff hike of 10.11 paisa per unit which is as high as 40% of the existing transmission charges. Therefore, any increase in transmission charges will invite Retail Supply Tariff increase through DISCOM for which Hon'ble Commission may take a suitable decision.

16. That. the Respondent craves leave for submission of further/additional submission as and when required.

NOTARY
Bhubaneswar Nanda
SAMBALPUR
Regd. No. 141 of 2012
Valid TILL
02/10/27
GOVT. OF ODISHA

Respondent

Place: Sambalpur

Date: 16-01-2026

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION

PLOT NO. 4, SAILESHREE VIHAR,

CHANDRASEKHARPUR, BHUBANESWAR-751021

CASE NO. 121/2025
FILING NO. 3

IN THE MATTER OF: (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

And

(ii) Truing up application for the FY 2024-25 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

AND
IN THE MATTER OF: Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

..... Applicant

vrs

TP Western Odisha Distribution Limited and **16 others.**

..... Objectors

Rejoinder to the objections raised by the Objector TP Western Odisha Distribution Limited (TPWODL).

The humble applicant above named
MOST RESPECTFULLY SHEWETH:

1. The answering Applicant denies all allegations, averments and submissions contained in the reply filed on behalf of TP Western Odisha Distribution Limited (TPWODL), which are contrary to or inconsistent with the record and / or what is stated hereinafter. Instead of giving a Para-wise Rejoinder, it is submitted as under:

Nalya Chikar Barik

2. Vide affidavit dated 16.01.2026, TPWODL has raised certain objections on ARR & Transmission Tariff Application of OPTCL for FY 2026-27 and Truing up application for FY 2024-25.

3. M/s. Odisha Power Transmission Corporation Limited, Bhubaneswar (in short OPTCL) undertakes Intra State transmission business in the state of Odisha. It has been notified as the State Transmission Utility (STU) U/s 39(1) of the Electricity, 2003.

4. Being the STU as well as a Transmission licensee, OPTCL is primarily responsible for transmitting electricity from power generation companies to the distribution companies within the State. The transmission infrastructures have been created based on the requirement / recommendation of Distribution Companies considering following components mainly:-

- To provide the power supply to upcoming Industrial hub.
- To strengthen the Inter State Power connectivity for import / export of power.
- To improve the voltage profile in the low voltage area/pockets.
- To provide un-interrupted power to the EHT, HT and LT Consumers of the state
- Availability of alternate power supply and also meet the N-1 Transmission planning criteria
- To improve the system availability, reliability & quality of the power supply.
- To meet the future load growth.
- To improve socio economic status of peripheral inhabitants.
- To reduce Transmission Losses.

5. It may be noted that OPTCL has been consistently maintaining system availability at around 99.98% which is more than the normative system availability of 98.50%.

6. Except NALCO & IMFA, all the open access customers are the consumers of Distribution Companies. Therefore, the consumers of Odisha are the ultimate beneficiaries of all the transmission infrastructure created by OPTCL.

7. OPTCL has adopted the principles enunciated in the Transmission Tariff Regulations, 2014 for proposing the different components of ARR for FY 2026-27 in the present application. Except return on equity, all the components allowed in the ARR are subject to truing up, which are carried out on the basis of actual expenses booked in the Audited books of Accounts of OPTCL. Considering the requirement for expenses on operation and maintenance, debt service obligation and other expenditure as per the provision stipulated in the Regulations, 2014, the transmission tariff is projected with justifications.

8. In the regulatory process all the controllable/uncontrollable cost incurred by licensee needs to be recovered through tariff so as to make it cost effective without burdening the future consumers. It is obligatory for the transmission licensee (STU) to conduct its operation within the amount approved by the Commission. Also, it caters to the growing demand of the state at optimal cost. Being the transmission licensee, OPTCL endeavors to control its expenditure on different heads to the maximum possible extent. It may be pertinent to mention that projection has been made based on the actual expenditure incurred in 1st half of FY 2025-26 along with the likely expenditure to be incurred in FY 2026-27.

9. Due to inflationary effects, the increase in cost is quite inevitable which needs to be considered in the transmission tariff process by the Hon'ble Commission. It is pertinent to mention that the STU charges in the state are comparably low with respect to CTU charges and STU charges of other states.

10. Para 1 to 5 are the matters of record.

11. Reply to PARA-6: Without proper analysis and justification mere apprehension of TPWODL towards imposition of excessive burden on Discoms seems to be inappropriate and unacceptable which is likely to be rejected at this juncture.

12. Reply to para-7 : It is respectfully submitted that the present application has been filed in accordance with the terms and conditions specified under the OERC Tariff Regulations, 2014. A mere comparison with the tariff approved for the previous year does not present a fair or complete picture. The estimates have been prepared based on audited accounts, anticipated asset additions, projected power demand, and other relevant factors.

13. **Para 9:** The projection of Employee Cost amounting to Rs. 531.52 Cr. is calculated in line with the Regulation 8.6 to 8.11 of OERC Regulations, 2014 with detailed justification. With regard to the approximately 8% increase in employee cost, the same is duly justified. Moreover, the employee cost projections of the DISCOMs are also broadly at a similar level.

Further, out of the total proposed employee cost, an amount of ₹205.84 crore has been projected towards meeting the terminal liability obligations of retired employees absorbed from the erstwhile OSEB, GRIDCO, etc. Accordingly, the actual employee cost attributable to current operations is substantially lower than the total ARR projection.

Next Section Before

14. **Para 10:** It is submitted that the nature of A&G expenses of the power utilities are almost the same. However, it is observed that for FY 2025-26, Hon'ble Commission had considered the escalation factor of all the utilities differently. The escalation factor for OPTCL is 2.37%, GRIDCO is 5.00%, DISCOMs is 7.00% and OHPC is 5.47%. Ideally, the escalation factor of all the utilities should have been in parity. Therefore, it should be 7% in line with DISCOMs . As per the Regulations, the A&G cost should be increased by WPI on the base year, provided the number of establishments have remained the same. But the number of establishments/offices of OPTCL has increased over a period of time commensurating with the increase in asset by addition of grid Sub-stations, ckt. kilometers of lines and MVA capacity for better supervision in construction, operation and maintenance and for maintaining quality of supply. Hence, A&G expenses should be increased proportionately. Further, it is submitted that some of the A&G Expenses are related to CPI also and it is evident that every year the actual expenses have crossed the approved amount despite it being a controllable expenditure. Therefore, Hon'ble Commission is hereby requested to consider the proposal of OPTCL and allow Rs. 46.95 Cr. towards Administrative and General Expenses (A&G). Further, considering the 7% escalation factor over last year it would be almost the same.

15. **Para11:** In the last year Tariff Order, Hon'ble Commission has observed that the health of transmission assets is vital for smooth and reliable operation of transmission system assets. The Commission therefore desires that OPTCL should incur R&M expenses exclusively for condition-based maintenance of transmission assets for improving reliability and availability of equipment & material associated with the transmission system for smooth and trouble-free operation of the system. The large increase in OPTCL's assets based, substations and lines reasonably justifies the rise in O&M expenditure . Deferred maintenance in a transmission system leads to outage, safety hazards and system failure which are ultimately costlier for the State. Effective O&M also ensures required quantum of power for adequate recovery of revenue.

It may be noted that the major R&M works are carried out usually during working season i.e. from January to March of every year. OPTCL has planned for additional R&M expenditure apart from the usual trend towards the following, Renovation works like re-metaling, fencing works, illumination, repairing of approach roads & boundaries, Earth pit maintenance & provision of contour & tripod earthing, provision of mandatory spares for AIS/GIS substations, provision of Binoculars/High beam torch lights for Grid Substations, provision of common entry gate for all GSSs, replacement of OIP bushings with RIP bushings & replacement of porcelain LA with Polymer LA near transformers, strengthening of LA earthing & provision of LA monitors, Control room building & store maintenance, Cable trench & drainage system maintenance etc. of old grid substations,

renovation works of EHT lines like revetment, recouping, putting tower footing earthing resistance, provision of TLAs (Transmission Lighting Arrestor), replacement of DISC insulators at all Road crossing and all tension points, replacement of multi-midspan joints & rectification of lines with intermittent PG clamps, tower painting, jumper replacement, stub repairing, AI based line patrolling, maintaining statutory clearance (with interposing towers) and miscellaneous works like provision of firefighting system for transformers, AMC for SAS, GPS based synchronizing equipment, cranes & lifts etc, Sanitation, reconditioning of 20MVA, 40MVA & 100MVA power transformers, Inspection Fees, procurement of Safety shoe, jacket, harness, helmet etc., Engagement of Security personnel and Jhulla & Tower Climbers, procurement of towers/structures/hardware fittings, Power & Control cables and Battery & chargers, Replacement of old ACDB & DCDB, Repair & replacement of old testing equipment, procurement of T&P materials.

It is pertinent to mention that statutory payments such as salaries of security personnel, Jhula and tower climbers, inspection fees, etc., are incurred on a regular monthly basis. However, expenditure towards grid and line maintenance works is generally booked towards the end of the financial year based on the bills submitted, i.e., after completion of the respective works during the working season. Consequently, R&M expenditure remains relatively low during the first nine months of the year, whereas nearly 40% of the total expenditure is accounted for during the last three months. As of December 2025, about ₹140 crore has been incurred towards R&M works, and for the full financial year, the total expenditure is expected to be ₹199 crore. Accordingly, OPTCL projected Rs. 259.65 Cr. towards Repair & maintenance which is well within the regulatory limit of Rs. 251.50 Cr. (i.e. 2.50% of GFA as on 31.03.2025). Hon'ble Commission is hereby requested to consider the proposal of OPTCL and allow Rs.259.65 Cr. towards Repair & Maintenance Expenses (R&M).Further, considering the substantial transmission asset base, Repair and Maintenance expenses at 2.5% of the Gross Fixed Assets are admissible under the applicable regulations.

16. Para 12:- Regulation 8.27 of OERC Regulations, 2014 stipulate that the Return on Equity (RoE) shall be computed in rupee terms, on the equity base determined in accordance with regulations 4.8 to 4.22 and regulation 8.17 to 8.24. Further, as per the Regulations 8.28 & 8.29 STU (OPTCL) shall be allowed a Return on Equity Capital in rupee terms at the rate of 15.5% per annum (post tax), on the amount of equity capital base as determined by the Commission. This rate of return needs to be grossed up with the normal/applicable tax rate. Further, the maximum equity allowable for ROE as per the regulation is 30% of the Capital Cost (GFA). The "Book value of own Assets as on

31.03.2026 (on which depreciation will be calculated) is **Rs. 6002.32 cr.**. Considering the above, OPTCL has projected the ROE of Rs. 279.11 Cr. @ 15.5% of equity base of Rs. 1800.696 Cr. (i.e. 30% of the GFA: – Rs. 6002.32 Cr. as on 31.03.2026). Hon'ble Commission is hereby requested to consider the proposal of OPTCL and allow Rs.279.11 Cr. towards Return on Equity (RoE).

17. **Para 13:** Regulation 8.44 of OERC Regulations, 2014 stipulates that "the **actual assessment** of income tax should take into account benefits of tax holidays and the credit for carry forward losses applicable as per the provisions of the Income Tax, Act 1961 shall be passed on to the consumers". In this regard, it is submitted that OPTCL has paid income tax amounting to ₹28.56 Cr. for the AY 2025-26. The same amount of ₹28.56 Cr. is proposed for FY 2026-27. However, differences if any, as per the Regulation 8.43 and 8.44, shall be adjusted during the true up exercise based on audited accounts.

18. **Para 14:** OPTCL has filed the trueing up application as per the Regulation 7.1 (Truing up of Capital Expenditure and Tariff) of OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 . Hon'ble Commission is hereby requested to consider the deficit ₹53.07 Cr. in truing up for the FY 2024-25.

19. The Transmission infrastructures are created considering the demand and request of the DISCOMs from time to time, after due approval form the Hon'ble OERC through Transmission Plan. Being a Transmission License, OPTCL has always endeavored to create the Transmission infrastructure for providing reliable and quality power to the consumers of DISCOMs. Accordingly, every year OPTCL is adding more transmission assets to meet the requirement of DISCOMs. Therefore, the ARR of OPTCL will be on an increasing trend in comparison to the previous year and OPTCL is entitled to recover its ARR fully from the DISCOMs. It is anticipated that the demand of DISCOMs (in MU) will increase proportionately with respect to addition of Infrastructure in the coming years.

20. OPTCL has proposed to recover the ARR amount of Rs. 1490.05 Cr. from LTOA customers including DISCOMs. It is proposed that Rs. 1376.81 Cr. to be recovered from DISCOMs for transmission of 38663.46 MU energy @ 35.61 P / kwh as transmission charges as detailed below:-

SL No.	DISCOMS	Energy Projected (MU)	Less:- Drawal in 33 & 11 Kv	Net Projected energy (MU)	Proposed rate@ p/u	Rs in Cr.
1	TPCODL	13248	32.00	13216	35.61	470.62
2	TPWODL	11952	324.00	11628	35.61	414.07

3	TPNODL	8853.46	31.00	8822.46	35.61	314.17
4	TPSODL	5050	53.00	4997	35.61	177.94
	TOTAL	**39103.46**	**440.00**	**38663.46**		**1376.81**

The quantum of energy projections were made based on the information received from DISCOMs.

21. The ARR projection of Rs.1490.05 Cr. for FY 2026-27 is increased by 6.53% over the projection of FY 2025-26. Transmission charge is arrived at 35.61 paise per unit by dividing the total ARR of OPTCL with the recent realistic MU projections of DISCOMs and recovered from them on a monthly basis. This rate will decrease if DISCOMs drawal increases.

22. Hence, mere apprehension of TPWODL towards imposition of excessive burden on Discoms seems to be inappropriate and unacceptable which is likely to be rejected at this juncture. Moreover, the contention of the stake holder operating in the value chain of electricity needs to appreciate the fact that the cost recovery has to be in full so as to make the sector sustainable.

23. Anything not specifically admitted or dealt with shall be deemed to have been denied. The answering Applicant craves leave and reserves its rights to make further submissions at the time of hearing. The objections not specifically admitted may be deemed to have been denied.

PRAYER

In view of the facts and submissions made herein above, the Hon'ble Commission may kindly consider the rejoinder of OPTCL to the objections of TPWODL while approving ARR and Transmission Tariff of OPTCL for FY 2026-27 & Truing up application for the FY 2024-25.

By the Applicant
Through

Sr. GM (El.), RT&C

Bhubaneswar
January 27, 2026

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION
PLOT NO. 4, SAILESHREE VIHAR,
CHANDRASEKHARPUR, BHUBANESWAR-751007

CASE NO. 121/2025
FILING NO. 3

IN THE MATTER OF: (i) An application for approval of Aggregate Revenue Requirement and Transmission Tariff for the Financial Year 2026-27 under Section 62, 64 and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014 and other tariff related matters.

And

(ii) Truing up application for the FY 2024-25 in compliance with the Regulation 7 of the OERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2014.

AND
IN THE MATTER OF: Odisha Power Transmission Corporation Limited, Janpath, Bhubaneswar

..... Applicant

Shri Ramesh Ch. Satpathy, Secretary, National institute of Indian Labour & President of Upobhokta Mahasangha and **16 others.**

..... Objectors

Affidavit verifying the submission

I, Sri Naba Kishore Barik, son of Late Shyam Sundar Barik, aged about 59 years, residing at Cuttack, do solemnly affirm and say as follows:

1. That, I am the Senior General Manager of Regulation, Tariff & Commercial wing of OPTCL and have been duly authorized by the Applicant, OPTCL to make this affidavit on its behalf.

2. That, the Statements made in paragraphs herein above are based on official information and I believe them to be true.

Bhubaneswar
Dt. 27.01.2026

SWORN BEFORE ME
N. MOHANTY
NOTARY
Regd. No.ON 20/94
382, Bhoi Nagar,
Bhubaneswar-751022
27.01.2026

Naba Kishore Barik
DEPONENT