



APPLICATION FOR LT OPEN ACCESS CHARGES (FY 2026-27)

NOVEMBER-2025

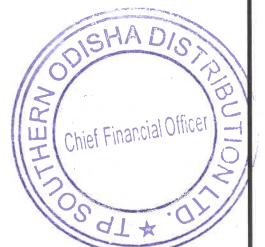
TP SOUTHERN ODISHA DISTRIBUTION LIMITED

(A Joint Venture of Tata Power and Government of Odisha)

Regd./Corp Office: Kamapalli, Courtpetta, Berhampur, Ganjam, Odisha – 760 004

Website: www.tpsouthernodisha.com Email: tpsodl@tpsouthernodisha.com

Corporate Identification Number (CIN):U40109OR2020PLC035195, GSTN: 21AAICT3239P1Z1





TPSODL/Regulatory /2025/94/ 85/18

28-November-25

Secretary

Odisha Electricity Regulatory Commission

Bidyut Niyamak Bhawan

Plot No 4, Chunokoli

Shailashree Vihar

Bhubaneswar 751021

Sub.: Application for determination of Wheeling Charges, Wheeling Losses, Cross Subsidy Surcharge 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 for the financial year 2026-27.

Dear Sir,

The present application is being filed by TP Southern Odisha Distribution Limited (TPSODL) before the Hon'ble Commission for approval of Application for determination of Open Access Charges for consumer and all enabling provisions for determination of Wheeling Charges, Wheeling Losses, Cross Subsidy Surcharge 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 for the financial year 2026-27.

The Application is attached as **Appendix** on behalf of TPSODL.

We trust our submissions are in order.

Yours faithfully

(Bijay Kumar Mohanty)

Chief - Financial and Regulatory



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BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION,
BIDYUT NIYAMAK BHAWAN.
PLOT No-4, CHUNOKOLI, SHAILASHREE VIHAR, BHUBANESWAR-751021

Case No._____/2025

IN THE MATTER OF: Determination of Wheeling Charges, Wheeling Losses, Cross Subsidy Surcharge 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 for the financial year 2026-27.

And



IN THE MATTER OF: TP Southern Odisha Distribution Ltd. (Formerly Southco Utility), Corporate Office, Kamapally, Courtpetta, Berhampur, Ganjam District, Odisha 760004. Petitioner

IN THE MATTER OF: All Stake Holders.

..... Respondents

AFFIDAVIT

I, Sri Bijay Kumar Mohanty, aged about 57 years, S/O Late Gobinda Chandra Mohanty, working as the Chief Financial Officer and Regulatory, do hereby solemnly affirm and state as follows:

- a) That, I am working as Chief Financial Officer and Regulatory of TPSODL, Courtpetta, 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.



Berhampur, Gm. Odisha
Sl. No... 07-569.....
Date: 28.11.2025...
Time... 1:45..AM/PM

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 Berhampur on this 28th day of Nov 2025

28-11-2025

Identified by the ADVOCATE

DECLARATION

The deponent having been identified by Advocate Sri. solemnly affirm before me on this day of 28-11-2025 at 1:45 AM/PM that the contents mentioned in this Affidavit are true to his/her knowledge information and belief

Miss Minati Rath
NOTARY Govt. of INDIA
Reg. No 46731 /2025
Berhampur Ganjam Odisha

Deponent



BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION,
BIDYUT NIYAMAK BHAWAN.
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Appendix

IN THE MATTER OF: Determination of Wheeling Charges, Wheeling Losses, Cross Subsidy Surcharge 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 for FY 2026-27.

And

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..... Petitioner

IN THE MATTER OF: All Stakeholders.

.... Respondents

MOST RESPECTFULLY SHEWETH:

1. That, the petitioner DISCOM has commenced its operation w.e.f 01.01.2021 as per terms of Vesting Order dated 28.12.2020. TP Southern Odisha Distribution Limited (TPSODL) 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 petitioner is the Distribution Licensee, as per License Condition dated 26.03.2021 of the Hon'ble Commission, in southern part of Odisha having six Distribution Circle namely City, Berhampur, Aska, Bhanjanagar, Jeypore and Rayagada with area of operation of 48,751 Sq.Km.
3. That, the petitioner 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.

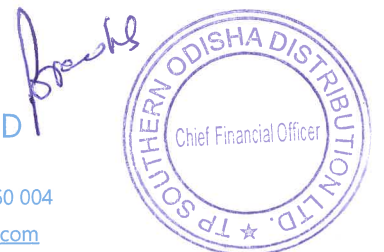
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A. Background for Submission of the Petition

4. The Hon'ble Commission vide gazette notification dated 11th January 2024 has notified the OERC (Promotion of Renewable Energy through Green Open Access) Regulations 2023 ("Green Open Access Regulations, 2023") for promotion of Green Energy.
5. The Green Open Access Regulations, 2023 allows consumers to procure power beyond a threshold of 100 KW capacity. The relevant extract from the regulations are provided below.
 - h) "Entity" means any consumer who has contracted demand or sanctioned load of one hundred (100) kW or more either through single connection or through multiple connections aggregating to Hundred (100) kW or more located in the same operating area of distribution licensee, except for captive consumer;
6. Further, the Hon'ble Commission in its retail supply tariff order for FY 2025-26 dated 24.03.2025 has stipulated following.

Open Access Charges at LT level

160. The OERC (Promotion of Renewable Energy through Green Energy Open Access) Regulations, 2023 is applicable to Consumers with Contract Demand or sanctioned load of 100 kW or more, either through one connection or through multiple connection aggregating to 100 kW or more. If a Consumer is availing power supply at LT level with aggregate CD of 100 kW or more, then the Consumer is eligible for availing Green Energy through Open Access. However, the Distribution Licensees have not filed any application for determination of Open Access charges at LT level. However, we have made some provisions in Wheeling Cost towards LT provisionally. Accordingly, the DISCOMs are directed to file the applications for determination of LT Open Access charges for FY 2025-26 by 31st July 2025. **(Emphasis Supplied)**

7. In accordance to the requirement of the Green Open Access Regulations, 2023 and in compliance to the above directive of the Hon'ble Commission TPSODL is submitting this petition for determination of Wheeling Charges, Wheeling

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Losses and Cross Subsidy Surcharge (CSS) for LT Consumers taking power on Open Access.

B. Determination of Applicable Open Access Charges for LT Consumers

I. Wheeling Losses for LT Consumers

8. The Wheeling losses for LT Consumers has been determined on the basis of Distribution losses, Sales and Input proposed in ARR for FY 2026-27. Further, the HT loss has been considered at 8% for determination of Open Access charges for HT and EHT consumers in the Tariff Order dated 24.03.2025 (para 2 of Annexure-C of the Tariff Order dated 24.03.2025) and the same has been considered for computation in this instant petition.
9. Further, it is assumed that when a LT consumer either through single or multiple connections (total aggregated CD>100 kW) will source power from a single generator, the power will be injected either at EHT or HT level. The computation of the applicable Wheeling loss for LT Consumers is as given in the table below:

Table 1: Wheeling Losses for LT Consumers for TPSODL

Sl. No.	Particulars (Proposed Data ARR FY 26-27)	Units	TPSODL
1	Total Power Purchase (Input)	MUs	5050
2	Distribution Losses	%	21.79%
3	Total Sales	MUs	3949.67
4 = 2x1	Total Losses	MUs	1100.40
5	EHT Sales	MUs	818.88
6 = 1-5	HT and LT Input	MUs	4231.12
7	HT Losses (As Considered at Para 2 of Annexure-C of Tariff Order dated 24.03.2025)	%	8%
8 = 7x6	Loss on HT Network	MUs	338.49
9	HT Sales	MUs	501.08
10 = 6-8-9	LT Input	MUs	3391.55
11	LT Sales	MUs	2629.71
12 = 1-(11/10)	Loss on LT Network	%	22.46%
13 = 12+7	Wheeling Loss Applicable for LT Open Access Consumers	%	30.46%

* Note: Based on the parameters as proposed in ARR FY 2026-27

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II. Wheeling Charges

10. The Wheeling Charges for Consumers in ARR for FY 2026-27. The extracts from the ARR for FY 2026-27 is as follows:

Statement of Allocation of Wheeling and Retail Supply Cost for FY 2026-27
(in Rs. Crs)

Sl No.	Cost/Income Component	ARR for Ensuing FY 26-27	Assumption Ratio for consideration in Wheeling Business	Assumption Ratio for consideration in Retail Supply Business	Wheeling cost for Ensuing FY 26-27	Retail supply Cost for Ensuing FY 26-27
1	Cost of Power	959.5	0%	100%	-	959.5
2	Transmission Charges	128.78	0%	100%	-	128.78
3	SLDC Charges	0.78	0%	100%	-	0.78
	Total power purchase cost	1,089.05			-	1,089.05
	O&M	-				
4	Employee Cost	584.02	60%	40%	350.41	233.61
5	Repair & Maintenance Cost	232	90%	10%	208.8	23.2
6	Administrative & General Expenses	177.29	50%	50%	88.64	88.64
7	Bad & Doubtful Debt including Rebate	23.68	0%	100%	-	23.68
8	Depreciation	136.2	90%	10%	122.58	13.62
	Interest on Loans	-				
9	for Capital loan	84.54	90%	10%	76.09	8.45
10	for Working capital	35.13	10%	90%	3.51	31.62
11	Interest on Security Deposits	30.77	0%	100%	-	30.77
12	Interest on EV Loan - Advance to Employees	0.45	0%	100%	-	0.45
13	Return on Equity	129.2	90%	10%	116.28	12.92
14	Tax on RoE	43.46	90%	10%	39.11	4.35
	Special Appropriation	-				
15	Carrying Cost	-	25%	75%	-	-
16	True Up of Current year GAP 1/3rd	-	25%	75%	-	-
17	Other, if any-Contingency Reserve	-	100%	0%	-	-
	Grand Total	2,565.79			1,005.43	1,560.36
18	Less: Misc. Receipts	-31.3	10%	90%	-3.13	-28.17
19	Total Revenue Requirement	2,534.49			1,002.30	1,532.19

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11. As can be observed from the above table, the proposed the wheeling charges for consumers in the ARR FY 2026-27.
12. It is relevant to submit that while the above table (in para 10) has presented the computation of Wheeling Charges, the energy required for both HT and LT Consumers has been used for computation of Wheeling Charges of HT Consumers. The same is also corroborated through the computations as presented in table below:

Table 2: Applicable Sales for Wheeling

Sl. No.	Particulars	Units	TPSODL
1	Power Purchase	MUs	5050
2	EHT Sales	MUs	818.88
3=1-2	Input to HT and LT Consumers for wheeling	MUs	4231.12

13. In other words, the Wheeling Charges have been worked out in the Tariff Order by considering the “Wheeling ARR” and dividing the same by the input to both HT and LT. Also, power that will be availed by LT consumers on open access will be either injected at EHT or HT and hence will travel through the HT & LT network before consumption at LT. Further, the Hon’ble Commission has approved wheeling charges on the basis that wheeling charges is independent of voltage level, the relevant extract from the Tariff Order dated 24.03.2025 is provided below for the ease of reference.

155. The determination of Wheeling Charges is independent of distribution voltage level i.e. 11 kV & 33 kV. The term ‘wheeling’ as per the OERC Wheeling and Retail Supply Tariff Regulations, 2022, is defined as the operation whereby the distribution system and associated facilities of a Distribution Licensee, are used by another person for the conveyance of electricity on payment of charges, to be determined under these Regulations. Therefore, Regulation does not differentiate distribution system in terms of voltage level and includes both 33 kV and 11 kV network. Therefore, the Commission determines a single wheeling charge for 11 kV and 33 kV.
(Emphasis Supplied)

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14. We have followed the same methodology as stipulated in above paragraph and Tariff Order dated 24.03.2025, and computed the Wheeling Charges for LT consumer in the licensed area of TPSODL as provided in table below.

We have computed the wheeling charges based on amounts proposed in our ARR FY 2026-27.

**Table 3: Wheeling Charges for LT Consumers in TPSODL's Licensee Area
(Based on Amounts Proposed in ARR FY 2026-27)**

Sl. No	Component	Ratio (out of total) for consideration in Wheeling Business	Proposed by TPSODL in ARR FY 2026-27	Proposed Wheeling (Rs. Cr.)
		A	B	C = A x B
1	Employee Cost	60%	584.02	350.41
2	R&M Cost	90%	232.00	208.80
3	A&G Cost	50%	177.29	88.65
4	Depreciation	90%	136.2	122.58
5	Interest on Long term Loan Capital	90%	84.54	76.09
6	Interest on Working Capital Loan	10%	35.13	3.51
7	Return on Equity	90%	129.2	116.28
8	Tax on RoE	90%	43.46	39.11
9	Gross Total		1421.84	1005.43
10	Less: non-Tariff Income	10%	31.3	3.13
11 = 9-10	Total Wheeling Cost		1390.54	1002.30
12	Total MU proposed for LT & HT			4231.12
13 = (11/12) x 1000	Wheeling Charges (Paise/Unit)			236.89

III. Cross Subsidy Surcharge (CSS)

15. The Hon'ble Commission had determined the CSS for EHT and HT Consumers in the Tariff Order. The relevant extracts from the Tariff Order with regards to determination of CSS for EHT and HT consumers is as follows:

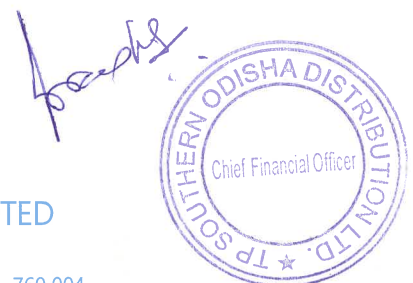
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OPEN ACCESS CHARGES (CROSS SUBSIDY SURCHARGE AND WHEELING CHARGES)

153. The OERC (Terms and Conditions of Intra State Open Access) Regulations, 2020 was notified on 2nd November, 2020. The Commission has defined the methodology for determination of Open Access Charges in Chapter 5 of these Regulations. For determination of the Cross-Subsidy Surcharge, the tariff for HT and EHT Consumers has been assumed at 100% load factor since Open Access drawal is made to utilise the full quantum of the power so availed. The formula prescribed in Regulation 23(2) of OERC (Terms and Conditions of Intra State Open Access) Regulations, 2020, which is as per the Tariff Policy, for determination of Cross Subsidy Surcharge is as follows:

Surcharge formula:

$$S = T - [C / (1 - L / 100) + D + R]$$

Where:

S is the surcharge

T is the tariff payable by the relevant category of Consumers, including reflecting the Renewable Purchase Obligation

C is the per unit weighted average cost of power purchase by the Licensee, including power purchase to meet the Renewable Purchase Obligation

D is the aggregate of transmission, distribution and wheeling charge applicable to the relevant voltage level

L is the aggregate of transmission, distribution and commercial losses (expressed as a percentage applicable to the relevant voltage level)

R is the per unit cost of carrying regulatory assets

154. As prevalent in the previous year, the Commission accepts 'C' equal to BSP of respective DISCOMs. Similarly, 'T' is the tariff at 100% load factor including demand charges for the respective voltage level. The wheeling charges 'D' is as determined from the distribution cost approved for the FY 2025-26 and 'L' is assumed 8% at HT and nil for EHT since EHT loss is accommodated in transmission charges.

16. CSS is applicable to subsidising consumers. However, not all category of consumers under LT category are subsidized consumers as their average tariff is more than Average cost of Supply. Hence, we have computed tariff category wise CSS as provided in tables below.

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Further, as we have already computed wheeling charges based on amounts proposed in ARR FY 26-27(explained at para 14), based on these wheeling charges we have computed CSS.

**Table 4:- Working of Cross Subsidy Surcharge for LT Category Consumers
(Based on Wheeling Charges computed in Table 3)**

SL. NO	CATEGORY OF CONSUMER	Average Tariff as Proposed in ARR FY 2026-27	Gridco BSP + Transmissi on Charges for FY 2026-27	Loss	Grossed up Rate	LT Wheeling Charges	CSS as per Formula	Applicable CSS	Applicable CSS
		Rs./kwh	Rs./kwh	%	Rs./kwh	Rs./kwh	Rs./kwh	Rs./kwh	Paise /kwh
	LT Category	T	C	L	C/(1-L)	D	$S' = T - C/(1-L) \cdot D$	$S = \max(S', 0)$	$S = \max(S', 0)$
1	Domestic Others	5.16	2.155	30.46%	3.10	2.37	-0.31	0.00	0.00
2	General Purpose <100 KVA)	7.91	2.155	30.46%	3.10	2.37	2.44	2.44	244.39
3	Irrigation, Pumping & Agriculture	1.69	2.155	30.46%	3.10	2.37	-3.77	0.00	0.00
4	Allied Agricultural Activities	1.86	2.155	30.46%	3.10	2.37	-3.61	0.00	0.00
5	Allied Agro-industrial Activities	4.53	2.155	30.46%	3.10	2.37	-0.94	0.00	0.00
6	Public Lighting	6.30	2.155	30.46%	3.10	2.37	0.83	0.83	82.93
7	LT Industrial (S) Supply < 22KVA	7.22	2.155	30.46%	3.10	2.37	1.75	1.75	175.03
8	LT Industrial (M) Supply >= 22KVA	7.59	2.155	30.46%	3.10	2.37	2.12	2.12	211.74
9	Specified Public Purpose	6.80	2.155	30.46%	3.10	2.37	1.33	1.33	133.48
10	Public Water Works & Sewerage pumping <100KW	6.52	2.155	30.46%	3.10	2.37	1.06	1.06	105.61
11	Public Water Works & Sewerage pumping >=100KW	6.77	2.155	30.46%	3.10	2.37	1.31	1.31	130.64
12	General Purpose (>= 110 KVA)	7.05	2.155	30.46%	3.10	2.37	1.58	1.58	158.44
13	Temp- Supply	6.82	2.155	30.46%	3.10	2.37	1.35	1.35	135.21
14	Large Industry	14.88	2.155	30.46%	3.10	2.37	9.41	9.41	941.05

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IV. Summary of applicable charges for LT Open Access consumers

17. Based on the computations provided in the earlier tables, the summary of the various charges proposed to be made applicable to LT Consumers who take power under LT Green Open Access is as summarized in the table below:

Table 5: Summary of Charges for LT Open Access Consumers

SL. No.	Particulars	Units	TPSODL
1	Wheeling Losses	%	30.46%
2	Wheeling Charges	P/KWh	236.89 (refer table-3)
3	CSS	P/KWh	As computed at table 4

C. Other Charges

18. Other Charges, other than what is provided at Table-5 above, that needs to be applied by the Petitioner on the LT Open Access Consumers are 'Standby Charges' and 'Banking Charges'.
19. It is submitted that necessary mechanisms have already been stipulated in the Green Open Access Regulations, 2023 and same shall be applied by TPSODL on Consumer availing Open Access at LT level.

D. Settlement of Energy for consumers taking power under Green Open Access Consumers

20. At present, all of the Open Access consumers are connected at EHT level. Such consumers are equipped with ABT meters which are capable of recording energy on 15 minutes time slot basis. Accordingly, the settlement of energy is also carried out on 15 minutes for these EHT consumers who source power on open access. Further, energy is settled on "Scheduled "basis. The Discom's Energy supplied to the consumer is worked out as equal to the difference between Energy metered and Scheduled energy on Open Access. If the Schedule Energy on Open Access is more than Energy Metered for any time slot, the excess lapses. The settlement is explained through an example as follows:

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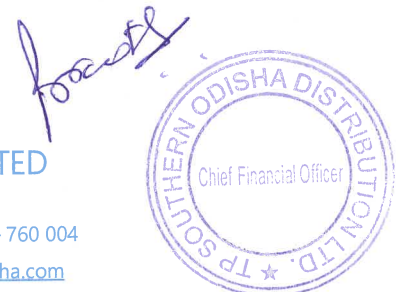




Table 6: Settlement of Energy under Conventional Open Access

Slot	Scheduled Energy on Open Access	Metered Drawl from Discom	Difference	Energy taken from Discom	Energy Lapsed
	kWh	kWh	kWh	kWh	kWh
a	b	c	d=c-b	e=d if d is positive else Nil	f=Nil if d is positive else d x-1
1	100	120	20	20	0
2	100	100	0	0	0
3	100	90	-10	0	10

21. It is further submitted that under Green Open Access, there may be a scenario where multiple connections of a consumer would come together (as a single LT consumer having 100 kW of CD is very unlikely) for availing green open access. These separate connections may be situated at different physical location within the Discom and will be having separate consumer numbers. Hence, the conventional mechanism of scheduling for individual consumers may be a challenge and also cumbersome particularly when the consumers are LT Consumers and large in number. Hence there may be a need for scheduling on “pre-agreed” allocation basis. The “Pre-agreed” allocation will have to be approved by the Discom and has to be applied to the Nodal Agency / Generation Source for the Energy Scheduled on Open Access. Such kind of allocation is also envisaged under Virtual Net Metering Arrangement.

22. The illustration of a case where generation is at EHT level and consumption is by 5 no. of consumers/connections from one source is as given below:

Table 7: Settlement under Green Open Access Regulations

Sr No	Particulars	Units	Value
1	Energy Scheduled at Injection at EHT in a time slot (Assumption)	kWh	2100
2	EHT Losses Applicable	%	3%
3	LT Losses Applicable	%	30.46%
4 = 1x(100%-2)x(100%-3)	Energy at Consumer end	kWh	1416

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Handwritten signature



Sr No	LT Consumer	Pre-Agreed Allocation	Energy Allocated	Meter Drawl from Discom	Energy from Discom	Energy Banked (if Banking Aailed, Scheduled & Approved)
		%	kWh	kWh	kWh	kWh
a	b	c	d= 4(above)*c	e	f=(e-d) if e>d else Nil	g= (d-e) if d>e else Nil
1	Cons 1	10%	142	100	0	42
2	Cons 2	20%	283	300	0	0
3	Cons 3	5%	71	150	79	0
4	Cons 4	5%	71	200	129	0
5	Cons 5	60%	850	900	50	0
	Total	100%	1416	1650	258	42

23. As the energy settlement including the Energy banked is on 15 minutes time slot basis, it is imperative that such consumers are required to install Smart Meters which are capable of measuring energy on 15 minutes time interval. The Hon'ble Commission has also stipulated the same at section -5 of the Green Open Access Regulations, 2023, relevant extract of which is provided below.

(5) Banking Facility and Charges:

....

e) The RE Generator shall provide Special Energy Meter (SEM) and the monthly settlement of energy sales shall be done based on Power injected to the system as per the meter readings. The Green Energy Open Access consumers shall install Special Energy Meter (SEM) or any other suitable meter approved by the Commission. The banking as well as withdrawal of banked energy shall be subject to day ahead scheduling. The energy accounting shall be on a real time basis in 15 minutes time block. (Emphasis Supplied)

24. In view of above, the LT consumers opting for open access under Green Open Access Regulations, 2023 must have Smart Meters installed at his premise.

[Handwritten Signature]



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E. Other related matters for the consideration of the Hon'ble Commission

25. The OERC (Conditions of Supply), Code, 2019 at para 134 stipulates that the LT supply can be provided up to 70 kVA. However, in the Retail Supply Tariff Order there are certain Tariff categories which have load > 70 kVA (e.g. L.T. Industrial (M) Supply ≥ 22 KVA & <110 KVA, Public Water Works and Sewerage Pumping ≥ 110 KVA, General Purpose ≥ 110 KVA, Large Industry ≥ 110 KVA). The Green Open Access Regulations, 2023 stipulates open access for contract demand or sanctioned load of 100 kW or above (either through single or multiple connection). In view of this inconsistency, a suitable clarification from the Hon'ble Commission will make the things clear.
26. Further, there may be certain connection given to LT consumers at HT level depending on the system feasibility. Given, the fact that there will not be any CSS applicable to certain LT consumers taking Green Power on open access, it may happen that some existing connections currently given power at LT may approach for conversion to HT. It is our submission that such conversion may not be allowed at present.



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27. Prayers

TPSODL prays that the Hon'ble Commission may kindly be pleased to:

1. Approve the Applicable Charges (Wheeling and CSS) for LT Consumers taking power on open access as proposed in Table-4 & Table-5 and additional charges if any.
2. Approve appropriate settlement procedure as the Hon'ble Commission deem fit and proper against our submission made in Section D of this petition.
3. Issue necessary clarification and direction with regards to the matter discussed in Section E of this petition.
4. Grant any other relief as deemed fit and proper in the facts and circumstances of the case.
5. Any other direction as the Hon'ble Commission may think appropriate
6. That, the petitioner craves leave for submission of further/additional reply as and when required by the Hon'ble Commission.



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