A utility pole with power lines against a sunset sky. The pole is dark and stands vertically, with several horizontal cross-arms. Power lines are strung across the sky, which is a warm, golden-orange color. The background shows some faint outlines of trees at the bottom right.

Submission on JVVNL Petition for True-Up for FY 2024-25, and ARR, Tariff and Investment Plan for FY 2026-27

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1. INTRODUCTION

Jaipur Vidyut Vitran Nigam Limited (JVNL) hereafter referred as “petitioner” filed a petition for approval of ‘True-up for FY 2024-25’ in accordance with the provision of RERC (Terms and Conditions for Determination of Tariff) Regulations, 2019. and ‘Aggregate Revenue Requirement (ARR), Tariff and Investment Plan FOR FY 2026-27’ in accordance with the provision of RERC (Terms and Conditions for Determination of Tariff) Regulations, 2025.

The present submission is in response to the petition filed by JVNL as published on the commission’s website. We request the Commission to accept this submission on record.

This submission is structured in six sections as given under:

- A. General Comments
- B. Comments on True-up of FY 2024-25
- C. Issues Raised by the Auditor
- D. Comments on ARR and Investment Plan of FY 2026-27
- E. Submission on Tariff Rationalization
- F. Submission on non-compliance of the Commission’s directives

2. GENERAL COMMENTS

2.1. Need of Enhancing Stakeholders Participation in Regulatory Process

2.1.1. Non-Availability of Public Notice and Executive Summary with the Petitions

It has been observed that the petitions uploaded on the website of the Hon’ble Commission (Rajasthan Electricity Regulatory Commission) do not contain the Public Notice duly signed by the Secretary of the Commission, as required. The absence of such a Public Notice affects the credibility and completeness of the petitions made available on the petitioner’s website.

Issuance of a Public Notice is a well-established regulatory practice and is consistently followed by other State Electricity Regulatory Commissions (SERCs) as well as the Central Electricity Regulatory Commission (CERC) to ensure effective dissemination of information and meaningful stakeholder participation (see Figure 1).

MUL – 2589/2025 – Petition for Truing up of FY 2024-25 & Approval of Revised ARR for FY 2026-27 and Determination of Tariff for FY 2026-27			
Sr.No.	Title	English PDF	Gujarati PDF
1	Public Notice		
2	Executive Summary		
3	Petition		

Figure 1: Petition available on GERC Website¹ with Public Notice and Executive Summary in English and Gujarati

In view of the above, it is respectfully urged that the Hon’ble Commission may kindly provide upcoming petitions with a duly signed Public Notice, along with an Executive Summary of the petition, be made available in both English and Hindi. This will facilitate greater transparency,

¹ Gujarat Electricity Regulatory Commission Website: <https://gercin.org/news/?cat=44493>

enhance stakeholder awareness, and enable more effective and informed participation in the regulatory process.

2.1.2. Inadequate Digital Dissemination of Public Information

In a welcome move, the petitioner has submitted the petition in a machine-readable format along with the requisite supporting spreadsheets, which are also made available on the petitioner's website. However, it has been observed that the information on invitation of comments and suggestions from Public has not been made adequately available through press releases or on respective website. Additionally, while advertisements of the petitions have been published in newspapers, copies of the same are not available on the petitioner's website².

It is pertinent to note that, in this digital era, newspapers are no longer the sole or most effective medium for reaching a wide and diverse set of stakeholders. For effective stakeholder outreach and meaningful public participation in this crucial regulatory process, public notices and related information should also be disseminated through official digital platforms. Such platforms include, inter alia, the Energy Department's website, the petitioner's official website, the DIPR-GoR website, and push notifications through the petitioner's "Bijli Mitra" mobile application.

In view of the above, it is respectfully requested that the Hon'ble Commission may be pleased to direct the petitioner to ensure that notifications and public notices relating to forthcoming petitions are promptly and comprehensively disseminated through all available digital channels of the petitioner and the Government of Rajasthan, so as to maximize stakeholder awareness and participation.

2.1.3. Insufficient Time to Analyse & Submission of Comments/Suggestions

As per the RERC Tariff Regulations, 2019 and 2025, all petitioners are required to file their petitions for the True-up of the preceding financial year and for the ARR, Investment Plan, and Tariff of the ensuing financial year by 30th November of the respective year. However, it has been observed in FY 2025-26 that all petitioners—including generation companies, transmission licensees, State Load Dispatch Centres, and distribution licensees under the jurisdiction of RERC—have filed their petitions during the last week of November.

As a consequence, interested stakeholders are required to submit their comments on more than 15 petitions within a narrow window between 05.01.2026 and 12.01.2026, whereas the petitions themselves are uploaded on the Commission's website only during the second and third weeks of December (see Figure 2). This effectively leaves stakeholders with an average of less than two days per petition to analyse the filings, prepare comments, and submit their responses. Such a compressed timeline renders meaningful analysis and informed participation practically impossible.

² Press Release Section of Petitioner's Website: <https://energy.rajasthan.gov.in/jvvn/#/pages/sm/press-release-list/49052/188/36>

S. No.	PetitionNo	Draft for Comments	Last date for submission	View
1	2379/2025	AVVNL petition for determination of ARR,Tariff for FY 2026-27, Approval Investment plan for FY 2026-27 and true up for FY 2024-25	09/01/2026	 
2	2367/2025	Petition seeking review of approved levelized tariff under PM kusum scheme component A and component C on account of change in law events as per article 12 (change in law)	12/01/2026	 
3	2380/2025	JdVVNL petition for determination of ARR,Tariff for FY 2026-27, Approval Investment plan for FY 2026-27 and true up for FY 2024-25	06/01/2026	 
4	2378/2025	JVVNL petition for determination of ARR,Tariff for FY 2026-27, Approval Investment plan for FY 2026-27 and true up for FY 2024-25	07/01/2026	 
5	2386/2025	Barmer Power Transmission Service Limited - Grant of Transmission Licence	11/01/2026	 
6	2387/2025	Hadoti Power Transmission Service Limited - Grant of Transmission Licence	11/01/2026	 
7	2385/2025	Thar Power Transmission Service Limited- Grant of Transmission Licence	11/01/2026	 
8	2384/2025	Determination of Transfer price of lignite for F.Y. 2026-27 from Kapurdi and Jalpa Lignite Mines of M/s. Barmer Lignite Mining Company Limited	07/01/2026	 
9	2383/2025	M/s JSW Energy (Barmer) Limited ARR and Tariff for F.Y. 2026-27	07/01/2026	 
10	2376/2025	RVUN True UP FY 2024-25 and ARR and Tariff for FY 2026-27	05/01/2026	 
11	2382/2025	SLDC Investment Plan 2026-27	05/01/2026	 
12	2373/2025	RVPN True Up 2024-25 and ARR 2026-27	05/01/2026	 
13	2375/2025	RVPN Investment Plan 2026-27	05/01/2026	 
14	2381/2025	SLDC True Up 2024-25 and ARR 2026-27	05/01/2026	 
15	2371/2025	Application under section 14, 15 and Section 86(1) (c), (d) and (k) of the Electricity Act, 2003, read with RERC (Licensing) Regulations, 2004 for grant of Transmission license to M/s Rajasthan Transmission Infrastructure Limited (RTIL).	07/01/2026	 

Figure 2: List of petitions on the hon'ble commission website for Stakeholder Comments/Suggestions

In contrast, the Central Electricity Regulatory Commission (CERC) and several other State Electricity Regulatory Commissions (SERCs) follow the established practice of providing a minimum of 30 days to stakeholders from the date of publication of the petition for submission of comments, thereby ensuring effective and meaningful participation. In the present case, even where advertisements were published in newspapers on 17.12.2025 with the last date for submission being 07.01.2026, the effective period available to stakeholders is approximately 21 days, which remains inadequate given the volume and complexity of the petitions involved.

In view of the above, it is respectfully requested that the Hon'ble Commission may be pleased to provide adequate time to stakeholders for detailed analysis of the petitions and for submission of their comments and suggestions. It is further requested that, in cases where stakeholder participation is limited, the Commission may consider extending the timelines for submission of comments to ensure broader and more meaningful engagement. Additionally, the Commission may kindly consider formulating appropriate amendments to the RERC (Transaction of Business) Regulations, 2021, and RERC Tariff Regulations, 2025 with a view to strengthening regulatory governance in future proceedings.

2.1.4. Audio-Visual Presentation by Petitioner

In compliance with the applicable regulatory requirements, the petitioner conducted a presentation on the True-up for FY 2024–25 and the ARR, Tariff, and Investment Plan for FY 2026–27 at its Headquarter Office in Jaipur on 24.12.2025. However, the notification of the said presentation was provided to stakeholders solely through a newspaper advertisement.

It is submitted that the petitioner is engaged in the distribution and supply of electricity across 15 districts of the State of Rajasthan. Conducting the presentation exclusively at the

Headquarter Office in Jaipur significantly limits effective participation by stakeholders located in other districts. Further, in the present digital era, such presentations can also be conducted through online platforms, which would enable participation from stakeholders situated in remote and geographically distant areas, thereby ensuring broader and more inclusive stakeholder engagement.

Additionally, it is submitted that the presentation should be made available in both English and Hindi to facilitate meaningful understanding and participation by a wider cross-section of stakeholders. This request holds heavier weight in context of Rajasthan where majority do not understand English. Hence, bilingual presentations would enable stakeholders to better comprehend the issues involved and submit informed comments and suggestions.

In view of the above, it is respectfully requested that the Hon'ble Commission may be pleased to direct the petitioner to conduct stakeholder presentations through both offline and online modes. It is further requested that such presentations be conducted in both Hindi and English languages. The petitioner may also be directed to upload a copy of the presentation on its official website to enable stakeholders to access the material and use it for reference while preparing their comments and suggestions. It is also suggested that the petitioner uses this opportunity to clear apprehensions of stakeholders through discussions and question and answers and not just treat it as a formal process of compliance.

2.1.5. Consumer Advocacy Cell

Chapter 5 of the Rajasthan Electricity Regulatory Commission (Consumer Grievance Redressal Forum, Electricity Ombudsman and Consumer Advocacy) Regulations, 2021 provides for the establishment of a Consumer Advocacy Cell. Further, Section 94 (3) of Electricity Act, 2003 empowers the Commission, to authorize any person, as it deems fit, to represent the interests of the Consumers in the proceedings before it.

Consumer participation in electricity regulatory process is necessary and important to ensure transparency and accountability. Consumer Advocacy Cell could have been an instrument for creating awareness about the Power Sector and the Regulatory process and enabling Consumer participation in the Electricity Regulatory process particularly these petitions. Currently consumer advocacy cells are in Kerala, Karnataka, Punjab, Madhya Pradesh, UP, Haryana, Assam and Tamil Nadu states, and supporting well to their respective SERCs.

In view of the above statutory and regulatory provisions, it is respectfully requested that the Hon'ble Commission may be pleased to constitute the Consumer Advocacy Cell at the earliest. Establishment of the said Cell would significantly contribute to strengthening consumer welfare, improving stakeholder engagement, and reinforcing transparency and accountability in the regulatory process.

2.2. Discrepancy in Surcharges Levied in Electricity Bills

As per the Tariff Order issued by the Hon'ble Commission for the Distribution Licensees dated 03.10.2025, the regulatory surcharge (including Fuel and Power Purchase Adjustment

Surcharge—FPPAS) is leviable on consumers subject to a ceiling of ₹1.00/kWh for all consumer categories and ₹0.70/kWh for domestic consumers with consumption up to 100 units per month. Since FPPAS is variable in nature, it is inherently difficult for an average consumer to independently compute and verify the regulatory surcharge and FPPAS levied in the electricity bills.

Further, it has been observed from sample consumer bills that the surcharges levied are not always in conformity with the rates approved by the Hon'ble Commission. For instance, while the Special Fuel Surcharge recovery approved by the Commission is ₹0.70/kWh, the recovery reflected in the consumer bills is ₹0.35/kWh, as evidenced from the Regular Bill Format (refer Figure 3). Such discrepancies create ambiguity and raise concerns regarding the accuracy and transparency of surcharge recovery.

उपखण्ड कोड : [REDACTED]
 टोल फ्री रिकवरी नं. : 1800-180-6507
 उपखण्ड नाम व पता : [REDACTED]
 जयपुर विद्युत वितरण निगम लिमिटेड
 राजस्थान कर्मांतव्य विद्युत बन्द, जयपुर, विद्युत उपभोग विवरण (उपभोक्ता प्रती)
 PAN NO.-AABCJ6373K, GSTIN.-09AABCJ6373K1Z7, HSN CODE.-: 2716
 कार्यालय कोन नं. : 2757023
 कार्यालय ई-मेल : [REDACTED]

बिल माह : 202512
 उपभोग : 118.00
 बिल जारी करने की तिथि : 05-12-2025
 बिलिंग स्थिति : R
 कुल माह बिल : 1.0000

पिछली बकाया राशि (₹)	वर्तमान देय राशि (₹)	नियत तिथि तक कुल देय राशि(₹)	विलम्ब भुगतान संचार्ज(₹)	नियत तिथि परव्याप्त देय कुल राशि	
0.00	108.0	108	2.16	110	
रोटा क्रमांक	रसी श्रेणी	DS	क्र.सं.	विद्युत बिल विवरण	बिल राशि (₹)
खाता संख्या	टैरिफ कोड	1000XA	1	विद्युत खर्च	645.50
रसी लीड/कि.वा./हा.पा.	ग्राहक/श्रेणी	U	2	रखाई शुल्क	300.00
कनेक्टेड लोड/कि.वा./हा.पा.	मीटरिंग टाइप	1	3	घरूल संचार्ज(4)गैलेटरी संचार्ज	177.25
कॉन्ट्रैक्ट टाइम/के.वी.पी.ए.	मीटर स्वामित्व	N	4	डिमांड संचार्ज	0.0
वायर फेक्टर	रखाई जोल्टेज	230	5	वायर फेक्टर संचार्ज(4)ग्रेससहान्(4)रेंट कीरिफेटर संचार्ज (3%)	0.0
बिलिंग डिमांड	मीटरिंग जोल्टेज	230	6	अनाधिकृत उपभोग राशि / Diff of Capping EC	0.0
मीटर की स्थिति	डी टी सी कोड		7	सी टी/पी टी, किराया	0.00
उपभोक्ता की स्थिति	अमानत राशि(₹)	1829.00	8	दासकर्मर किराया	0.00
वर्तमान पदन तिथि	मीटर/पी टी सी टी सुरक्षा राशि(₹)	0.0/0.0	9	(1) अन्य/TOD Surcharge	0.00
गत पदन तिथि	औसत मासिक उपभोग(यू.ए.)	225	10	(2) Green Energy/Parallel Charges	0.0
वर्तमान स्थापित मीटर नं.	गुणांक	1.00	10	रिबेट(-)(1)गोल्डेज (Other Rebates)	-0.97
वर्तमान पदन (KWH)	गत पदन (KWH)	10629.00	11	(2)गोल्ड/रिबेट (TOD Rebate)	-0.00
वर्तमान पदन (KVAH)	गत पदन (KVAH)	0.00	11	निगम राशि (क्रम सं 1 से 10 तक का योग)	1121.78
वर्तमान पदन (KVA)	गत पदन (KVA)	0.00	12	विद्युत शुल्क वर्तमान उपभोग पर	47.20
बदले गये / अतिरिक्त मीटर नं.	गुणांक		13	जल संचालन उपकरण	0.00
वर्तमान पदन (KWH)	गत पदन (KWH)	0	14	नगरीय उपकरण	17.70
वर्तमान पदन (KVAH)	गत पदन (KVAH)		15	अन्य देय / जमा कोड**	0
वर्तमान पदन (KVA)	गत पदन (KVA)		16	रजोत पर स्वामित्व (TGS)/TDS	0.00
Remarks (MC/RV case)	AMISMUSER		17	समोहित राशि (Lock Adjustment)	0.00
TOD	सुविट	उपभोग	सुविट	कुल उपभोग राशि (क्रम सं 1 से 17 तक का योग)	1186.68
TOD (12PM to 4PM)	0.0 (KWH)	118.00	19	पिछले बिल तक बकाया राशि	0.00
TOD (6AM to 8AM)	0.0 (KVAH)	0.00	20	स्वमित बकाया राशि	0
TOD (6PM to 10PM)	0.0 (KVA)	0.00	21	राज्य सरकार द्वारा कटन राशि (1) टैरिफ राशि/डी	-1078.680
Green Energy Units	Incr. Units/New Ins. Units	0.00	22	(2) मध्यमरी किराया मिल उठाता योजना में अनुदान	0
			22	कुल देय राशि (क्रम सं 18-21)	108
				** Sundry Adjustment Code & Description (Max 3 Entry Showing)	
				Base / Regular / Special / Regulatory	
				0.00 / 16.8100 / 41.71 / 118.0	

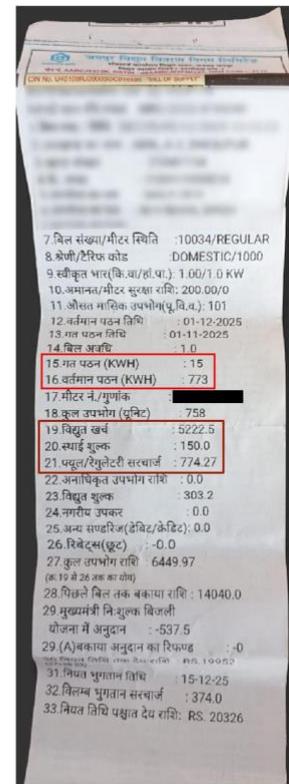


Figure 3: Discrepancy & Transparency issues in Regular and Spot Bill Format of JVVNL

Besides this, it has also been observed that electricity bills across different subdivisions do not levy these surcharges uniformly and are subject to significant deviations. In view of the above, it is respectfully requested that the Hon'ble Commission may be pleased to direct the petitioner to provide a separate and explicit break-up of the Regulatory Surcharge and FPPAS in consumer bills, ensuring that the cumulative levy does not exceed the approved ceiling limits. It is further requested that the petitioner be directed to furnish a detailed explanation for the discrepancies observed between the Commission-approved rates and the amounts actually recovered through consumer bills. Additionally, the petitioner may be directed to formulate a Standard Operating Procedure (SOP) for levying these surcharges, so as to ensure

uniformity across subdivisions and improve transparency and ease of understanding for consumers.

Additionally, the Hon'ble Commission may kindly consider constituting a committee to initiate an independent audit of the accuracy and correctness of tariff and surcharge recovery through consumer bills at the level of Rajasthan Discoms. Such an audit may also examine the existing bill format and recommend a simplified, transparent, and consumer-friendly billing format, to be implemented in a time-bound manner, in the interest of regulatory compliance and consumer confidence.

3. COMMENTS ON THE PETITION FOR TRUE-UP OF FY 2024-25

3.1. Persistence of Data Gaps in the Petition

In each tariff petition, as per the provisions of the RERC (Transaction of Business) Regulations, 2021, it has been the established practice of the Hon'ble Commission to first scrutinise the petition and seek replies from the petitioner on data gaps and deficiencies. Only after completion of such scrutiny are the petitions placed in the public domain for inviting comments and suggestions from stakeholders. This process significantly facilitates meaningful analysis of the petitions by stakeholders, owing to the availability of complete and verified data.

However, in the present year, several material deficiencies persist in the data submitted by the petitioner. By way of illustration, the petitioner has not provided data on defective meters, which is critical for estimating effective energy sales at the end-consumer level. Similarly, important information such as circle-wise expenditure on loss reduction initiatives in high-loss circles, circle-wise vigilance data indicating assessments and realisations, scheme-wise details of subsidies and grants received, category-wise number of defective meters, detailed break-up of miscellaneous charges and recoveries, and reconciled data in the prescribed True-Up Forms has not been furnished. Further, discrepancies have been observed in multiple data submissions across the petition.

The absence of the above information materially constrains the ability of stakeholders to undertake an informed and meaningful review of the petition and undermines the transparency and robustness of the regulatory process. It is therefore requested to provide these details with the petition documents for effective assessment of the petitioner's performance.

3.1.1. Non-Disclosure of Detailed Break-up of Interest Components

In Table 1 of the petition, the petitioner has provided a combined amount in for actual 'Interest on Working Capital, Interest on Free Loan and Interest on Bonds', and 'Interest on Regulatory Assets'. We do not see any rationale behind combining both heads of different natures and request the petitioner to provide a detailed break-up of each category.

3.1.2. Non-Submission of Complete Data in Form 3.1

It is submitted that the data furnished by the petitioner is not fully in accordance with the formats prescribed by the Hon'ble Commission. Specifically, in Form 3.1, the petitioner has not provided the Variable Cost per unit, including Fuel Price Adjustment (₹/kWh), nor the plant-wise utility share (%) for several thermal power plants (TPPs), including those of Rajasthan Vidyut Utpadan Nigam Limited (RVUN), which is one of the major power suppliers to the petitioner (see **Error! Reference source not found.**).

Form D 3.1									
Power Purchase Expenses									
Name of Distribution JVVNL									
Licensed Area of Sup Jaipur Discom									
Year 2024-25									
S. No.	Source of Power (Station wise)	Installed Capacity	State Share (%)	Utility Share (%)	Utility share (MW)	Total Energy Sent Out (ESO) from the station (MU)	Capacity Charges paid/ payable by Utility (Rs Crore)	Variable Cost per unit including Fuel Price Adjustment (₹/kWh)	
1	2	3	4	5	6	7	9	10	
(V)	STATE GEN. & OTHER								
1	R.V.U.N.	1,240.00	100%	37.76%	468.22				
(i)	KTPS(1 to 7)					3,068.62	205.02		
(ii)	STPS(1 to 6)					2,712.33	212.09		
(iii)	BSCPP (7&8)					2,613.72	449.04		
(iv)	DCCPP					19.54	1.49		
(v)	CTPP (1-4)					2,526.91	252.57		
(vi)	CSCTPP (5 & 6)					3,007.89	467.21		
(vii)	RGTPP(1-3)					171.72	16.02		
(viii)	KaTPP&2					2,826.72	396.28		
(ix)	MAHI					80.98	8.15		
(x)	MAHI MMH					0.33	-		
(xi)	MANGROL					2.15	-		
(xii)	STPS MMH					0.32	-		
(xiii)	OTHERS					-	-		
	TOTAL					17,031.22	2,007.86		
	Prior period					-	-		
	TOTAL (with Prior period)	1,500.00	100%	37.76%	566.40	17,031.22	2,007.86		
2	GLTTP	1,000.00	100%	37.76%	377.60				
	Prior period	1,320.00	100%	37.76%	498.43	(0.36)			
		1,200.00	100%	37.76%	453.12				
	RAJWEST POWER LIMITED	140.00	100%	37.76%	52.86	2,349.65	412.69		
	Prior period	0.97	100%	37.76%	0.37				
3	TOTAL (with Prior period)					2,349.65	412.69		
	TOTAL V	16.89	100%			19,380.50	2,420.56		
	TOTAL V (with Prior period)	330.00	100%			19,380.50	2,420.56		

Figure 4 Form 3.1, Power Purchase Expenses

In view of the above, it is respectfully requested that the Hon'ble Commission may be pleased to direct the petitioner to submit complete and accurate data strictly in the prescribed format. The petitioner may also be directed to furnish station-wise details of energy received, expressed in million units (MUs), to enable proper scrutiny and assessment of power procurement costs and related parameters.

3.1.3. Non-Disclosure of Transmission Tariff and Contracted Capacity Data

In Form 3.4, the petitioner has not furnished transmission tariff and contracted capacity data for all Transmission Network Providers (TNPs), except Rajasthan Vidyut Prasaran Nigam Limited (RVPNL) (see Figure 5).

Form D3.4					
Transmission Charges					
Name of Distribution Licensee			JVVNL		
Licensed Area of Supply			Jaipur Discom		
Year			2024-25		
S. No.	Name of Transmission Network Provider	Contracted Capacity (MW)	Transmission Tariff <Rs/Unit>	Transmission Charges (Rs. Crore)	Remarks
1	2	3	4	5	6
1	CTUIL	2109.30	0.00	920.34	
2	MARU TRANSMISSION	0.00	0.00	14.73	
3	Aravali Transmission service	0.00	0.00	9.08	
4	RVPNL	6992.10	156.89	1338.38	
5	Hadoti	0.00	0.00	18.27	
6	Thar Power	0.00	0.00	13.12	
7	Barmer power	0.00	0.00	14.62	
8	NRLDC POSCO	2,193.23		1.88	
9	RLDC	0		10.70	
	Total	11294.62	156.89	2341.13	

Figure 5: Data not provided for Transmission Tariff and Contracted Capacity in Form 3.4 of True Up for FY 25

However, transmission charges for all TNPs have been claimed by the petitioner. Such partial disclosure results in a lack of transparency and prevents proper verification and prudence check of the transmission charges claimed.

In view of the above, it is respectfully requested that the Hon’ble Commission may be pleased to direct the petitioner to furnish complete details of transmission tariff and contracted capacity for each Transmission Network Provider, along with reasons for non-submission of such data in the petition. It is further requested that, in the event of continued non-furnishing of the requisite data, the Hon’ble Commission may consider disallowing the transmission charges claimed by the petitioner, in the interest of transparency, regulatory compliance, and consumer protection.

3.2. Alignment of Revenue and Expenditure Based on Trued-Up Energy Sales

As per the True-Up Order for FY 2023–24 issued by the Hon’ble Commission for the petitioner dated 08.09.2025, it is observed from Table 18 that the Hon’ble Commission has disallowed more than 4% of the power purchase cost estimated by the petitioner. This disallowance is primarily attributable to the consideration of energy sales at the end-consumer level, instead of input-level energy sales, in franchisee areas.

However, under the “Sale of Power” head on the revenue side, no corresponding deduction appears to have been made on account of the trued-up energy sales. This may have resulted in over-recovery of revenue arising from the mismatch between trued-up expenditure and revenue based on energy sales.

In view of the above, it is respectfully requested that the Hon’ble Commission may be pleased to review both revenue and expenditure on the basis of trued-up energy sales for FY 2023–24. Further, if any over-recovery is established upon such review, the same may kindly be passed on to consumers in the True-Up for FY 2024–25, in the interest of equity and consumer protection.

3.3. Energy Sales (Table 2 of the petition)

3.3.1. Assessment of Agricultural Energy Sales Based on Actual Metered Consumption

The petitioner has submitted that flat-rate agricultural connections were converted into metered connections during FY 2024–25. In this regard, it is requested that the petitioner be directed to furnish the total number of such consumers, along with details of the average billing period covering all months during which flat-rate billing was applied.

In view of the above conversion, it is respectfully submitted that the Hon'ble Commission may not consider agricultural energy sales figures based on annual specific consumption assumptions, as adopted by the petitioner. Instead, for consumers who were converted from flat-rate to metered category during the year, both flat-rate energy sales and actual metered energy sales may be considered appropriately. Further, for consumers who remained under the metered agricultural category for the entire financial year, only actual metered energy sales may be considered.

Accordingly, it is respectfully requested that the Hon'ble Commission may direct the petitioner to furnish agricultural energy sales strictly on the basis of actual metered consumption.

Further, the petitioner may be directed to provide the following information:

- I. Slab-wise data as below, including the total number of consumers billed, total connected load, and total energy units sold:
- II. Consumption up to 2,000 units per month
- III. Consumption above 2,000 units per month
- IV. Circle-wise data on defective meters along with the corresponding revenue realisation.
- V. Monthly status reports indicating the total number of meters, the number of defective meters at the end of each month, and the number of meters repaired during the month.
- VI. Circle-wise details of meters remaining defective for more than two months.
- VII. Clarification on the persistently high incidence of defective meters and details of the corrective measures being implemented to address the issue.

It is submitted that furnishing of the above information would enable a more accurate assessment of actual agricultural energy consumption and support realistic energy sales forecasting for future years, thereby facilitating informed, transparent, and effective regulatory decision-making by the Hon'ble Commission.

3.3.2. Non-Disclosure of Revenue Realisation from Defective Meters

It is submitted that the petitioner has not provided any information regarding the revenue realised from consumers having defective meters. The absence of such critical information restricts proper assessment of billing efficiency, revenue recovery, and compliance with applicable regulations.

In view of the above, it is respectfully requested that the petitioner be directed to furnish the following information:

- Circle-wise details of defective meters along with the corresponding revenue realised from such consumers.
- Monthly status reports indicating the total number of meters, the number of defective meters at the end of each month, and the number of meters repaired or replaced during the respective month.
- Circle-wise details of meters that remained defective for a period exceeding two months.
- A detailed clarification on the extent of defective meters and the corrective measures being undertaken by the petitioner to address and mitigate this issue in a time-bound manner.

3.3.3. Franchisee Energy Sales Data & Performance Reporting

Despite the approval of energy sales at the end-consumer level by the Hon'ble Commission, the petitioner has continued to submit energy sales data at the input level, which is not in conformity with the Commission's earlier directions and established regulatory practice. Submission of data at the input level obscures actual consumption patterns and undermines the accuracy and transparency of the true-up exercise.

Further, it has been observed that the petitioner has not submitted audited performance reports of franchisees along with the respective true-up petitions. The absence of such audited reports effectively masks inefficiencies in franchisee operations and prevents a proper assessment of their performance and impact on the overall system.

In view of the above, it is respectfully requested that the Hon'ble Commission may be pleased to allow and insist upon the consideration of energy sales at the end-consumer level, in line with its earlier orders. It is further requested that the petitioner be directed to submit audited performance reports of franchisees.

3.4. Discrepancies in data reported in Form 2.1 for FY 25

We would like to highlight that the discrepancy in sanctioned connected load and the capacity utilization of the load of different consumers categories from the petition documents. We estimated average load factor of consumers for respective categories and sub-categories based on revenue data provided by JVVNL in Form 2.1 for FY25. The formula used for estimation of load factor is,

$$L_F = \frac{E_s}{L_C \times 24 \times 365}$$

where,

L_F is load factor for a consumer category

E_s is total energy sold to the consumer category

L_c is the Connected Load for the consumer category

In **ANNEXURE – I** we have provided data for selected categories where we observed discrepancies. The observations are highlighted here.

- Relatively higher capacity utilization is observed for BPL consumers. This may be explained by³
 - a) The sanctioned load on record has for BPL consumers is not updated for past years, and hence the connected load on record may be lower than actual, leading to higher load factor.
 - b) Other billing and metering issues leading to increase in energy sold on record in comparison to actual.
- Very high load factors are observed for domestic sub- categories GD4 and GD5. We are unable to deduce any rationale for the same, and it may be attributed to energy accounting issues. The petitioner is requested to explain the same.
- Similar, higher load factors are observed for NDS type 3 and type 4 up to SCL of 5KW and for NDS type 4 above SCL of 5KW. The petitioner is requested to explain the same.
- Load factor of agriculture category is also very high. The petitioner is requested to explain the same.

The petitioner is requested to provide clarifications for the discrepancies highlighted above.

3.5. RDSS Scheme

The progress reported by the petitioner under RDSS scheme is slow and unsatisfactory, falling significantly short of the approved targets. The reasons cited by the petitioner for delayed progress—such as right-of-way (ROW) challenges, seasonal constraints, contract terminations, legal stays, and delays in obtaining No Objection Certificates (NOCs)—reflect deficiencies in planning and execution, particularly given that the projects were awarded as early as FY 2019.

In view of the above, it is requested that the petitioner be directed to furnish the following information:

- Circle-wise and year-wise targets, along with the current progress, for installation of smart meters on feeders and distribution transformers.
- Copies of case records, legal documents, and relevant correspondence submitted by stakeholders or other institutions citing reasons for denial of ROW for RDSS works.
- Detailed reasons for contract terminations and legal stays, along with the present status of such cases and their impact on project timelines.

³ It may be noted that both issues won't impose any financial burden on the consumers because of the existing subsidy regime and hence they are unlikely to be highlighted by the consumers. However, this may lead to appropriate of losses by discom and over-spending by public exchequer against accrued subsidies.

3.6. Inter-State and Intra-State Losses

In Table 3 of the Petition (see pg. 16 of the Petition), the Petitioner has provided a cumulative figure for inter-state and intra-state transmission losses. However, it is important to note that the Commission, through its orders dated 24.11.2021, 01.09.2022, 31.03.2023, and 26.07.2024, 08.09.2025 has repeatedly directed the Discoms, including petitioner, to maintain separate accounts for inter-state and intra-state transmission losses and to provide this bifurcation in future true-up petitions. The Commission has also warned that any further failure to comply with these directives would result in adverse action. Despite these clear directives, there has been persistent non-compliance with Commission's orders.

Therefore, we request the Commission to take serious note of this continued non-compliance and strictly direct the Petitioner to provide a clear breakdown of inter-state and intra-state transmission losses. We further urge the Commission to impose appropriate penalties for repeated violations.

Last year, the Petitioner informed the Commission about the formation of a committee comprising officials from JVVNL, RUVNL, and RVPNL to address this issue. In this context, we request the Petitioner to provide an update on the status of the committee and the recommendations it has made to comply with the Commission's directive.

Furthermore, we would like to highlight that the transmission losses claimed by the Discom are exceptionally high when compared with losses from states with comparable geography and load profiles (see Table 1). We request the Commission to scrutinise this issue, seek clarification on the high transmission losses, and direct the Petitioner to provide details on the measures taken to mitigate them.

Table 1: Transmission Losses in states with comparable geography and load profiles

S. No.	State	Transmission Loss	FY	Source
1	Maharashtra	3.26%	2024-25	State Grid Loss Account (see pg. 02)
2	Gujarat	3.84%	2022-23	GETCO Final Tariff Order FY25 (see pg. 56)
3	Madhya Pradesh	2.61%	2023-24	ARR for FY2025-26 MPERC (see pg. 23)

We further submit that the Commission reject the high losses claimed by the Petitioner and recompute the overall energy balance computations, to reflect the normative losses.

3.7. Power Procurement Cost

In Table 4 of the Petition, the Petitioner has presented the details of power purchase costs incurred during FY 2024–25. It is concerning that the Petitioner has purchased around 4,129 MU from the short-term market. This volume constitutes roughly 9% of the gross power requirement and is significantly higher than the 4135.77 MU approved under short-term procurement. The tariff for these short-term purchases averaged ₹ 5.18/kWh, which is approximately 19% higher than the gross per unit power purchase cost of ₹ 4.34/kWh.

A review of the previous three years' performance reveals a consistent and growing reliance on the costlier short-term market (see Figure 6). This trend, both in terms of increasing quantum and rising cost differential, points to persistent shortcomings in demand estimation and procurement planning. The financial implications are also evident.

In contrast, a reverse trend is observable in procurement from cheaper sources such as non-conventional energy sources (NCES). Over the past four financial years, the deviation between approved and actual procurement from NCES has widened, from a shortfall of approximately 29% in FY 2021-22 to over procurement nearly 10% in FY 2024-25.

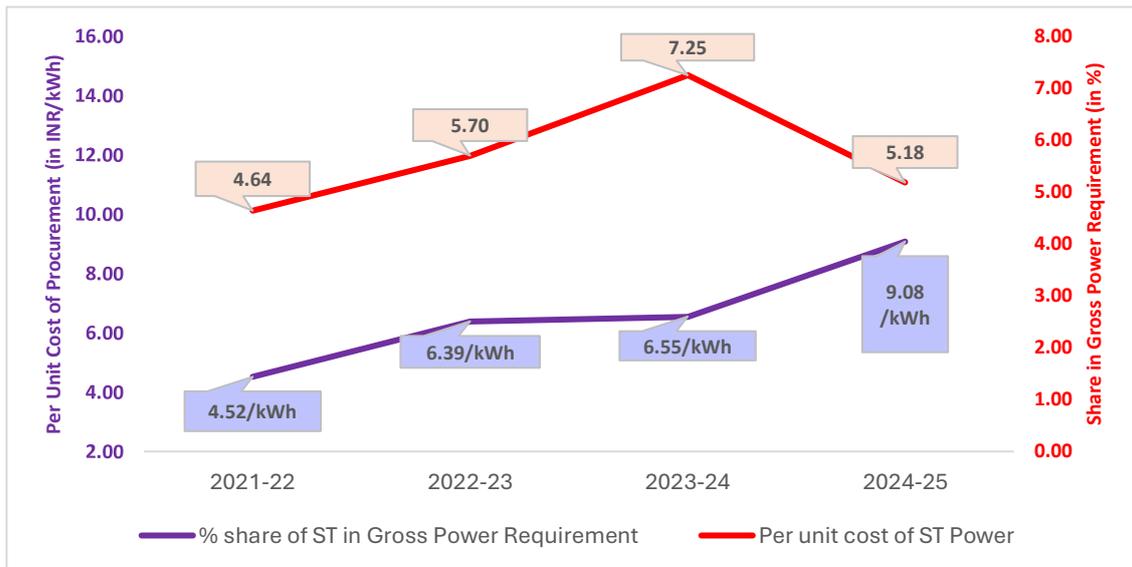


Figure 6: Year-wise per unit cost of ST power and share of ST power in gross power requirement

These procurement patterns collectively suggest a failure to optimize the power portfolio in line with prudent utility planning which undermines both cost efficiency and regulatory discipline. Such inaccuracies in demand forecasting not only compromise the reliability and affordability of supply but also impose avoidable financial strain on the Petitioner and, ultimately, on consumers.

In view of the above, it is respectfully submitted that the Petitioner be directed to furnish a detailed explanation for the deviation from approved short-term market purchases and its increasing reliance on high-cost short-term procurement. The Petitioner may also be required to account for the persistent shortfall in procurement from approved non-conventional and other lower-cost sources. The Petitioner may also be directed to clarify if it has invoked any of its contractual rights over power generating companies for deviating from their yearly agreed and approved commitments in the past three years. Furthermore, the Commission may consider directing the Petitioner to outline the corrective measures being taken to strengthen its demand forecasting and procurement planning processes, so as to ensure better alignment with cost-effective, long-term contracted power in future planning cycles.

3.8. Employees Training & Safety

As per Table 7 of the petition, the petitioner has incurred an expenditure of ₹1.57 crore towards training and safety of employees. However, incidents of electrocution continue to increase across the State, raising serious concerns regarding the effectiveness and adequacy of the safety measures implemented by the petitioner.

During FY 2021–22 to FY 2024–25, a total of 227 electrocution accident cases involving Nigam and contractual employees have been reported, out of which 74 cases were fatal (see ANNEXURE – II). This alarming incidence reflects serious deficiencies in safety practices and occupational risk management.

In view of the above, it is respectfully requested that the Petitioner be directed to furnish detailed information on the specific initiatives, safety protocols, training programmes, and preventive measures undertaken to mitigate and prevent such accidents. The Petitioner may also be required to explain how these measures are being implemented, monitored, and periodically reviewed to ensure the safety of both permanent and contractual employees.

The above information is essential for assessing the effectiveness of the petitioner's safety-related expenditure and for ensuring enhanced safety standards for personnel engaged in electricity distribution operations.

Furthermore, under the RERC (Investment Approval) Regulations, 2006, Distribution Licensees are permitted to allocate up to 1% of their Investment Plan expenditure for institutional strengthening. We request the Petitioner to confirm whether any activities have been undertaken under this provision and provide details of the corresponding expenditure.

3.9. Discrepancies in Reported Distribution Losses

Upon examination of True-Up Form D-7.1, it is observed that the distribution losses reported for the franchisee areas have been shown as 0%, which appears to be incorrect and inconsistent with operational realities.

In view of the above, it is requested that the petitioner be directed to submit the correct distribution loss data for franchisee areas at the end-consumer level, so as to enable proper verification and assessment of distribution losses. Further, the petitioner may also be directed to disclose the circle-wise loss reduction targets set for FY 2024–25, along with details of the specific initiatives and measures undertaken to achieve the same.

It is further noted that five circles of petitioner are operating with distribution losses exceeding 20%. Notably, the losses in Deeg circle is 36.8%. This reflects persistent inefficiencies in loss management and underscores the need for focused and outcome-oriented interventions, particularly in high losses circles.

Moreover, the petitioner has not furnished circlewise data of technical and commercial losses in True-Up Form D-7.1 in the format prescribed by the Hon'ble Commission, thereby constraining effective scrutiny and regulatory assessment.

In view of the above, it is respectfully requested that the Hon'ble Commission may be pleased to issue appropriate directions to the petitioner to furnish complete, accurate, and disaggregated data strictly in the prescribed formats, and to ensure targeted, measurable, and time-bound reduction of distribution losses, especially in circles with persistently high losses.

3.10. Non-Disclosure of Consumer Awareness Expenses

The Petitioner, in Table 9 of the Petition (see pg. 31), provides a breakdown of A&G expenses for FY 2024-25, specifying consumer awareness expenses as ₹20.18 Cr. However, the petitioner neither provided circle-wise expenses incurred nor that how these funds were spent. A comprehensive breakdown and impact analysis will help in understanding how effectively the allocated funds have been utilised in enhancing consumer awareness. This includes specifying the type of activities, such as workshops, campaigns, advertisements, and community outreach programs, along with the cost incurred for each.

We submit, the Petitioner take this issue seriously and provide a detailed month-wise and circle-wise list of activities undertaken for consumer awareness along with associated costs. It will also provide insights into the effectiveness of different awareness initiatives, enabling better planning and resource allocation for future consumer awareness programs. Additionally, we request details of any impact analysis conducted to assess the improvement in consumer awareness.

3.11. Significant Deviations in R&M Expenses

In Table 10 of the Petition (see pg. 32), the Petitioner has reported actual Repair & Maintenance (R&M) expenses of ₹477 Cr., which is significantly higher than the approved ₹277 Cr., exceeding it by ₹200 Cr. The Petitioner has given the breakup that these expenses were majorly incurred for the repair and maintenance of plant & machinery and for lines & cable network during FY 2023-24.

This marks the third consecutive year in which actual expenses have significantly exceeded the approved amount (see Figure 7).

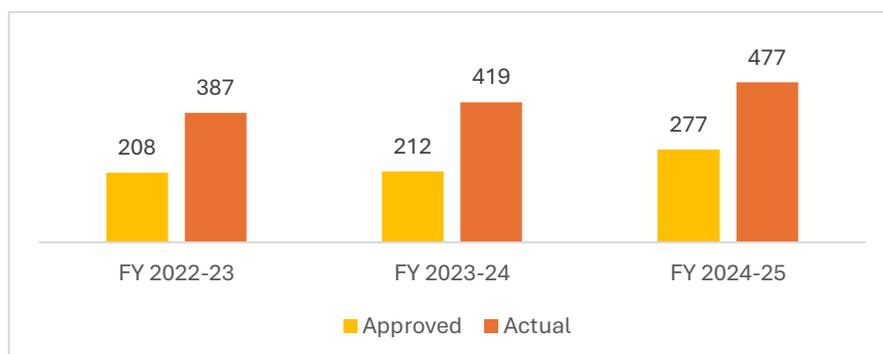


Figure 7 Repair and Maintenance Expenses (Rs. in crores)

Therefore, we seek clarification from the Petitioner explaining reasons for their inability to plan R&M for the distribution network and forecast required expenses prudently. Additionally,

we request a circle-wise breakdown of the expenses incurred for R&M, along with details on how these activities have improved reliability or other key performance metrics.

3.12. Insurance Expenses

The Petitioner, in Table 12 of the Petition (see pg. 32), shared Insurance Expenses FY 2024-25, specifying actual insurance expenses as ₹1.38 Cr. against the approved insurance expenses of ₹38 Cr. We request the Petitioner to provide detailed explanation for significant reduction in insurance expenses despite the fixed assets and net worth remaining the same.

3.13. Depreciation

In Table 14 of the Petition (see pg. 34), the Petitioner reports depreciation for FY 2024-25, with actual depreciation of ₹1,303 Cr. compared to the approved amount of ₹868 Cr. We request the Petitioner to provide the reasons for this significant deviation and a detailed breakdown of asset calculations and depreciation methodology.

3.14. Compensation for Injured/ Death of Employees and Outsiders

The Petitioner, in Table 15 of the Petition (see pg. 34), has provided details of other debits and prior period expenses during FY 2024-25, wherein it specifies compensation for injured/death of employee and compensation for injured/death of outsiders as ₹6.39 Cr. and ₹0.16 Cr., respectively. We request the Petitioner to provide details of each accident resulting in injury or death of employees and outsiders, including the cause of the accident and the relevant circle. This should include detailed accident reports, electrical inspector reports, and action taken reports. Furthermore, we request the Petitioner to provide data on the compensation paid for loss/damage of property during FY 2024-25.

Additionally, the Petitioner has reported a loss of ₹ 05.09 Cr. on the sale of scrap/fixed assets, as shown in Table 15. We request the Petitioner to provide circle-wise details of the loss incurred on these fixed assets.

Furthermore, the Petitioner has also reported losses of fixed assets due to theft of ₹ 1.32 Cr. We request the Petitioner to furnish details of such theft incidents, along with the measures undertaken to mitigate and prevent such occurrences in the future. The Petitioner may further be directed to adopt an SOP for disposal of retired assets to prevent such losses.

3.15. Circle-Wise Details of Rebate Provided to Consumers

In Paragraph 3.58 of the Petition (see pg. 30–31), the Petitioner has reported rebates granted to consumers for FY 2023-24 of ₹ 408.69 Cr. We request the Petitioner to provide a circle-wise and category-wise breakdown of the beneficiaries and the corresponding waiver amounts.

3.16. Bad Debt

The petitioner, in Table 16 of the petition (refer page 35), has reported “bad debts” amounting to ₹200.86 crore, despite there being no such amount approved by the Hon’ble Commission.

Further, the petitioner has not disclosed the opening balance and closing balance of prior-period bad debts for the relevant year, thereby limiting transparency and regulatory scrutiny.

In view of the above, it is requested that the petitioner be directed to furnish detailed and item-wise information on the claimed bad debts, along with a clear justification and explanation for the same. The petitioner may also be directed to disclose the opening and closing balances of prior-period bad debts and to clarify the regulatory basis, if any, for inclusion of such amounts in the petition.

3.17. Non-Tariff Income and Other Tariff Income

The petitioner, in Paragraph 6.63 of the petition (refer page 35), has provided details of non-tariff and other tariff income for FY 2024–25. However, the petitioner has not disclosed the revenue realised from the use of electricity poles (pole rent), which constitutes a material component of non-tariff income.

In this regard, it is requested that the petitioner be directed to disclose the income earned through pole rent and to furnish circle-wise details of both realised and unrealised non-tariff income from pole rentals, along with information on the number of poles utilised in each circle. Further, the petitioner may also be directed to submit affidavits from the concerned Assistant Engineers of sub-division offices where pole rent realisation has been reported as zero, in compliance with the directions issued by the Hon'ble Commission in its earlier orders.

3.18. Compensation on Standard of Performance Violations

The Commission, in its order dated 31.03.2023 and 26.07.2024, directed the petitioner to report all parameters based on smart meters wherever installed and to pay direct compensation immediately for any violations.

In this regard, we request the petitioner to provide detailed circle-wise information on direct compensation disbursed for violations of the standard of performance. This should include the total number of consumers who received such compensation and the overall amount disbursed.

3.19. Revenue Deficit

The Petitioner has submitted in Paragraph 3.82 and Table 22 (see pg. 41) the details of 'Revenue Surplus/Deficit for FY 2024-25', where the net revenue gap stands at ₹1,162Cr as against the revenue surplus of ₹2073 Cr approved by the Commission. This has been a pattern for the last decade, that the Petitioner projects a revenue surplus during the ARR and ends up in deficit during the true up. We submit the commission takes serious note of this glaring issue, and recommend appropriate action, including constituting a committee to examine the root-cause of the issue.

Further, as per the conditions stipulated under the Revamped Distribution Sector Scheme (RDSS), no new regulatory assets are to be created from FY 2022–23 onwards. In view of this explicit stipulation, it is respectfully requested that the Hon'ble Commission may be pleased

not to allow the creation of any new regulatory assets in the present or future tariff proceedings, in strict adherence to the RDSS guidelines and in the interest of regulatory discipline and consumer protection.

4. ISSUES RAISED BY THE AUDITOR

The Petitioner has reported in Para 1.5 of the Petition that it has not submitted the audit report as its accounts were undergoing CAG audit. Instead, the Petitioner has attached Provisional Accounts and Provisional Cost Records, with a promise to submit the audit report at a future date. The Petitioner's ground for non-submission is not a reasonable justification and severely undermines the truing-up process. The Petitioner should be directed to submit a detailed explanation for not submitting the audit report.

In the Petitioner's 25th Annual Report for 2024-2025, the independent auditor has highlighted several issues concerning the company's financial statements and operations, along with instances of non-compliance. We wish to bring these concerns to the Commission's attention and request that the Commission direct the Petitioner to take appropriate corrective actions to resolve these issues and ensure compliance. The key issues are detailed below:

4.1. Deficiencies in Internal Financial Controls over Subsidiary Records and Liabilities

The auditor observed that JVVNL's internal financial controls related to the maintenance of subsidiary records, timely adjustment of advances to suppliers, and provisioning for liabilities are not operating effectively. In several instances, subsidiary records are either inadequately maintained or updated only at year-end, rather than when goods or services are received. These material weaknesses may lead to potential misstatements in the recognition of expenses, assets, and liabilities.

Additionally, the Petitioner's internal controls for reducing distribution losses are ineffective. A significant discrepancy between the units of energy purchased and sold highlights deficiencies in billing and theft prevention controls. This material weakness could negatively impact the Petitioner's revenue and overall financial position.

4.2. Government Grants, Subsidies and Subvention

According to Auditor, the recognition of Consumer Contribution, Grants and Subsidies is not in accordance with accrual system of accounting as required by Indian GAAP. Further, amortization of Consumer Contribution, Grants and Subsidies towards cost of capital assets in 25 years without any correlation with the life of assets created, is not in consonance with the Accounting Standard-12 "Accounting for Government Grants."

4.3. Absence of Records of Lease Hold Lands and Free Hold Lands

The Petitioner lacks records for certain leasehold and freehold lands and has not updated the Property, Plant, and Equipment Register for the year. Due to missing details, the value and

existence of these assets cannot be verified. Consequently, its impact on the Statement of Profit and Loss, including amortisation, lease rent, and taxes, remains unascertainable.

Moreover, the Petitioner does not maintain a Property, Plant, and Equipment (PPE) Register. As a result, the amounts related to losses due to theft, profit or loss on the sale of assets, and assets transferred to the “Assets Not in Use” category could not be verified.

4.4. Incomplete CWIP Records

The Auditor observed that the Petitioner has not maintained detailed, day-to-day, scheme/work order-wise records in respect of Capital Work-in-Progress (CWIP). As a result, the auditor was unable to verify the opening balance of CWIP, additions during the year, transfers to Property, Plant and Equipment, and the closing balance of CWIP. Consequently, the impact of this limitation on the financial statements could not be determined.

4.5. Unreconciled Consumer Credit Balances under Trade Receivables

The Auditor observed that the Petitioner has neither identified the reasons for consumer credit balances under Trade Receivables in the books of account nor reconciled these balances with the consumer-wise credit balances recorded in the Management Information System (MIS). In the absence of relevant details, the quantification of any understatement or overstatement of Trade Receivables, Other Current Liabilities, and Revenue is not ascertainable.

4.6. Non-Maintenance of Subsidiary Ledgers for Security Deposits

The Auditor observed that the petitioner has not maintained subsidiary ledgers for consumer security deposits and meter security deposits. In the absence of such subsidiary ledgers, the accuracy and correctness of the balances reported under these heads cannot be independently verified.

5. COMMENTS ON ARR AND INVESTMENT PLAN OF FY 2026-27

5.1. Claim of Return on Equity

It has been observed that the Petitioner has not submitted a claim for Return on Equity (RoE) as part of its filing. RoE is a fundamental component of the tariff framework for electricity distribution companies (Discoms), as it ensures a fair return on the equity capital invested in the business.

Incorporating RoE is essential for the financial sustainability of Discom operations. It plays a key role in enabling Discoms to fund long-term infrastructure upgrades, adopt new technologies, and enhance service delivery. Furthermore, RoE contributes to a balanced capital structure and incentivises efficient financial management and operational performance.

Given its significance, it is recommended that the Petitioner be directed to appropriately compute and include a claim for Return on Equity in accordance with the applicable regulatory guidelines.

5.2. Projection of Energy Sales

5.2.1. Projection of Category wise Energy Sales

In Table 32 of the Petition, the Petitioner has projected category-wise energy sales for FY 2026-27 using the Compound Annual Growth Rate (CAGR) derived from historical sales data and trends. However, past True-Up exercises have revealed significant deviations between the approved and actual energy sales figures, indicating that the methodology adopted by the Petitioner is flawed and lacks accuracy (see Figure 8). Such over- or under-estimation of energy sales can adversely impact power procurement planning and compromise the quality-of-service delivery to consumers.

Moreover, inaccurate sales projections may result in the backing down or surrender of surplus power, incurring fixed charges payable to generating companies, or compel the procurement of high-cost power through bilateral arrangements or electricity exchanges—ultimately imposing an additional financial burden on consumers.



Figure 8 Category wise energy sales deviation in JVVNL

We request the adoption of a more robust methodology for forecasting energy sales. The Petitioner may consider following the Central Electricity Authority's (CEA)⁴ guidelines for medium- and long-term power demand forecasting, or refer to best practices adopted by other states, to minimise the deviation between approved and actual energy sales figures. We also request the Commission to direct the Petitioner to provide month-wise projections of energy sales for each consumer category and sub-category based on such methodologies.

5.2.2. Projection of Sales for Agriculture Category

In Paragraph 4.17 of the petition, the petitioner has described the methodology adopted for projection of energy sales in the agricultural category, wherein projections have been made based on specific consumption and average connected load on an annual basis, despite the fact that all agricultural consumers are stated to be metered.

In this regard, it is submitted that reliance on specific consumption norms and average connected load constitutes an assumptive approach and does not reflect actual consumption behaviour of metered consumers. Accordingly, it is respectfully requested that the Hon'ble Commission may be pleased to direct the petitioner to furnish agricultural energy sales and projections strictly based on actual metered consumption data, instead of using assumed specific consumption.

Further, it is suggested that the petitioner may be directed to undertake energy sales projections at different connected load levels, to capture consumption variability more accurately and ensure realistic and data-driven forecasting for regulatory assessment.

5.2.3. Distribution Franchise (DF)

The petitioner submitted combined sales projections for the areas served by JVVNL and its distribution franchises. However, in paragraph 4.43, the petitioner merges the sales to consumers in JVVNL's area with those of the DF areas. Consequently, the sales projections do not account for the distribution losses incurred by the DF and instead focus only on sales to various categories of consumers in the DF area, thus under-projecting the sales to be incurred by the Discoms.

We request the petitioner to project sales for JVVNL's area separately from that of the DF, by considering the power sold to DF as a single sale. The same shall also be used to project the revenue realised as the revenue from the consumers in the DF area shall not be recovered by the Discom and petitioner only realises the revenue from the input sale to DF at the bulk rate. Escalations in the sales to DF can be computed based on trends from previous years.

We further request the Commission to order a detailed performance review of distribution franchises. The sales data (exclusive of DF sales) is also essential to compute the normative O&M expenses (employee expenses, A&G expenses, and R&M expenses) of the Discom, as the Commission has been approving the O&M expenses in the true-up based on sales made

⁴ https://cea.nic.in/wp-content/uploads/ps_if/2023/07/Guidelines_for_Medium_and_Long_Term_Demand_Forecast-1.pdf

to consumers exclusive of the DF area. We also request the petitioner to clearly state the methodology and assumptions considered for the modification of the sales projections.

5.3. PM Surya Ghar: Muft Bijli Yojana

As per Paragraph 4.38 of the petition, the Government of Rajasthan intends to extend additional benefits to beneficiary families under the *Mukhyamantri Nishulk Bijli Yojana* by increasing the free electricity entitlement from 100 units to 150 units per month in a phased manner. This is proposed to be achieved through installation of free rooftop solar plants under the *PM Surya Ghar: Muft Bijli Yojana*, with the objective of containing the increasing financial burden on the State exchequer.

However, as reported in the media, the adoption of the scheme by small domestic consumers—particularly those interested in installing approximately 1.1 kW rooftop solar (RTS) systems—remains significantly low. One of the primary reasons for this poor uptake is the requirement for consumers to make an upfront payment of approximately ₹70,000, which is reimbursed at a later stage. In addition, the cost of the meter is also being borne by the consumers.

Due to these substantial upfront installation costs, marginal and small domestic consumers are effectively excluded from availing the benefits of the scheme. Consequently, as on 15.12.2025, only 113 domestic consumers with consumption up to 50 units have been enrolled under the scheme, out of a total of 6,441 eligible domestic consumers in the petitioner area, highlighting the limited reach and effectiveness of the scheme in its present form (see ANNEXURE– III) .

In view of the above, it is requested that the petitioner be directed to furnish category-wise details of domestic consumers who have enrolled under the scheme and those in whose premises RTS systems have been successfully installed. It is further requested that the Hon'ble Commission may be pleased to advise the Government of Rajasthan and direct the petitioner to formulate and implement effective and consumer-friendly guidelines aimed at enhancing participation of marginal and small domestic consumers under the scheme, so as to ensure equitable access and achievement of the intended policy objectives.

5.4. High Distribution Losses in Circle

As per the Form D7.2 of the ARR formats, the distribution losses in several other circles, namely Deeg, Dholpur, Karauli, Kotputli, and Baran are alarmingly high (above 20% losses). These figures are well above the targets projected by the Petitioner for FY25 and FY26, which are 15% and 14%, respectively. The current trajectory of loss levels in these areas indicates a considerable deviation from the anticipated benchmarks and underscores the need for intensified corrective measures and strategic interventions (see Figure 9).

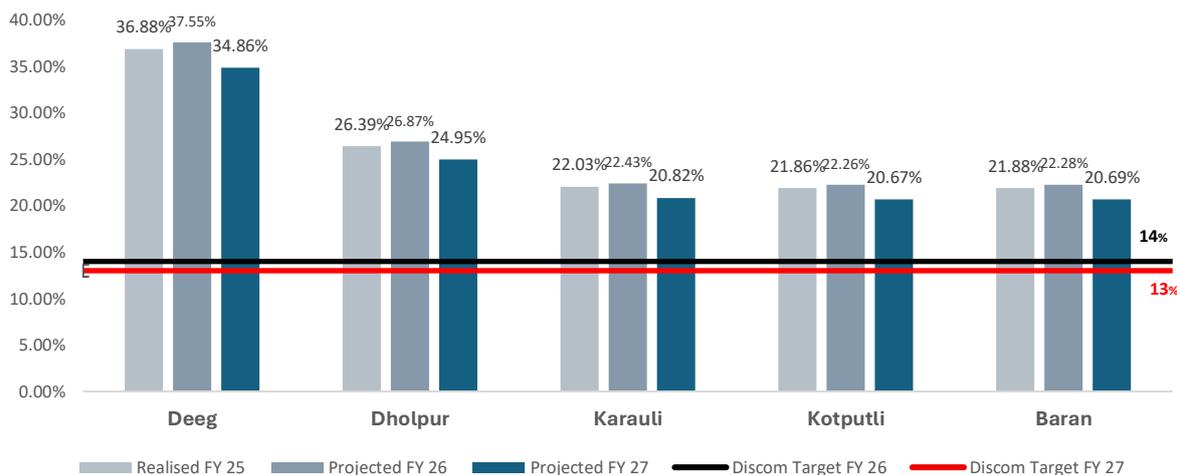


Figure 9 High distribution losses projected in few circles of Jaipur Discom

In view of the above, we respectfully request the Commission to direct the Petitioner to implement similar loss reduction initiatives in the mentioned circles.

5.5. Details of Faulty/Damaged Meters

At present, for billing in cases of faulty meters, the Discoms have adopted provisional billing based on average consumption. This practice adversely affects billing accuracy and undermines the overall reliability and credibility of the metering infrastructure. While certain media reports⁵ have highlighted the Discoms' efforts towards achieving zero defective meters across circles—except for agricultural meters—the actual extent of progress remains unclear in the absence of verifiable data.

In this context, it is respectfully requested that the Hon'ble Commission direct the Petitioner to furnish detailed, circle-wise information on the number of faulty meters identified and replaced during the period from FY 2023–24 to FY 2024–25. Further, the Petitioner may also be directed to provide circle-wise details of defective agricultural meters for FY 2024–25, along with the status of defective meters yet to be replaced.

Provision of the aforesaid data is essential to assess the true scale of the issue, verify the claims made by the Petitioner, and ensure that timely and effective corrective measures have been undertaken to improve metering accuracy and consumer confidence.

5.6. Pending Agriculture Connections

In the Rajasthan State Budget for FY 2025–26, the State Government announced a provision for the release of 50,000 new agricultural electricity connections. In this context, the Petitioner is required to disclose the progress achieved in its operational area against this provision, along with the targets set for FY 2025–26.

⁵ <https://timesofindia.indiatimes.com/city/jaipur/jaipur-discom-replaces-defective-meters-except-for-agri-connections/articleshow/126293706.cms>

However, it is observed that there exists a substantial backlog in the release of agricultural connections. Reports and field observations indicate that many applicants, despite having duly deposited demand notices and completed all requisite formalities, are still awaiting energisation of their agricultural connections. By way of illustration, 1,50,686 applicants deposited demand notices for agricultural connections under the general category during FY 2021–22 to FY 2024–25, whereas only 82,235 wells were energised during the same period, reflecting a significant gap between demand and actual release (see ANNEXURE – IV).

In view of the above, it is respectfully requested that the Hon'ble Commission may be pleased to direct the Petitioner to furnish a detailed, circle-wise status of pending agricultural connections, clearly indicating:

- Exact number of pending applications to be energised under general category,
- Circle wise and year wise targets to provide new connections,
- Specific reasons for pendency or delay, and
- Standard timeframe and guidelines to provide new connection in agriculture general category

5.7. RDSS Scheme

As per Commission's Directive in the order dated 24.11.2021, the Discom communicated that it aims to achieve 100% feeder metering by December 2022 and 100% DT metering by December 2023. We request the Petitioner to provide a circle-wise report on the total number of meters at feeders and DT, along with details of operational and faulty meters.

The Petitioner has also provided an activity-wise progress under the Revamped Distribution Sector Scheme (RDSS) in the Petition. However, the submission does not include any details for the completion of the remaining activities.

We request the Petitioner to submit a comprehensive plan outlining the timelines and strategies for completing the remaining RDSS activities.

5.8. Circle-wise details of smart meters

We request the Petitioner to provide detailed information on the total numbers of smart meters installed along with the circle-wise list, with a further breakdown by category. Additionally, we request the Petitioner to specify its plans for smart meter installation over the next three years, along with details of the necessary tie-ups or arrangements made with the respective vendors.

5.9. E- CGRF (Consumer Grievance Redressal Forum) Portal

It is submitted that the Petitioner operates over a very large geographical area; however, only three Consumer Grievance Redressal Forums (CGRFs) are presently functioning, located at Bikaner, Barmer, and Jaipur districts. Due to long distances, logistical constraints, and limited

awareness, access to these Forums remains difficult for a large number of consumers, thereby undermining the effectiveness of the grievance redressal mechanism.

In this regard, it is suggested that the Petitioner be directed to develop and operationalise a dedicated web-based CGRF portal, enabling consumers to file grievances and appeals online. The proposed portal should be designed in a manner that provides flexibility to both appellants and respondents to participate in proceedings either through online mode (including virtual hearings) or offline mode, as may be convenient.

Such a digital platform would significantly enhance accessibility for consumers, reduce travel and compliance costs, and improve efficiency for field officers and management by optimising time and resources. It is pertinent to note that a similar web-based CGRF mechanism is already operational in the electricity sector in the State of Gujarat⁶, demonstrating its feasibility and effectiveness.

In view of the above, it is respectfully requested that the Hon'ble Commission may take cognizance of this issue and direct the Petitioner to establish a comprehensive and user-friendly online CGRF portal to ensure better facilitation of consumer grievances and strengthen consumer protection mechanisms.

5.10. New Capacity Addition

In paragraph 5.4 of the Petition, the Petitioner has outlined the details of scheduled capacity additions through solar parks planned for Rajasthan Discoms in FY27, aggregating 2370 MW. Additionally, totalling 5690 MW capacity is expected to be commissioned under KUSUM scheme along with biomass power plant consisting 37 MW in FY 2025-26. However, it is important to highlight that most of the Renewable Energy (RE) are yet to be commissioned. Based on multiple Quarterly Reports on Under-Construction Renewable Energy Projects published by the Central Electricity Authority (CEA), it has been consistently observed that solar power projects tend to face delays in execution and commissioning. In this context, the Petitioner's assumption of energy availability from these projects appears overly optimistic.

Therefore, we respectfully request the Commission to undertake a prudence check of the proposed new capacity additions. This review should assess the actual likelihood of timely availability of power from these sources. Only capacity that is reasonably certain to come online within the projected timeline should be approved for consideration in the energy availability plan for the state.

5.11. Source wise Energy Availability

In Table 35 of the petition, the petitioner has provided source-wise energy availability from various sources, including non-conventional energy sources (NCES). However, the petitioner has not disclosed the energy availability arising from the injection of rooftop solar (RTS) systems and other decentralised energy resources.

⁶ <https://cgrf.guvnl.com/>

In view of the above, it is respectfully requested that the Hon'ble Commission may be pleased to direct the petitioner to furnish complete details of energy availability from NCES with a detailed break-up, including energy injected through the KUSUM scheme, rooftop solar installations, and other decentralised sources. Such disclosure is essential for accurate assessment of energy availability, power procurement planning, and regulatory scrutiny.

Moreover, the petitioner has shown procurement of 1,880 MU of energy from power exchanges in FY 2025–26, while simultaneously stating in the ARR petition that there is no requirement for short-term power purchase. Further, in the petition for FY 2026–27, the petitioner has again projected nil power purchase requirement from power exchanges.

Such inconsistent submissions indicate deficiencies in power procurement planning and forecasting. Unplanned or inadequately justified procurement from power exchanges can have adverse tariff implications for consumers due to price volatility and lack of prudence checks.

In view of the above, it is respectfully requested that the Hon'ble Commission may be pleased to issue strong and explicit directions to the petitioner to undertake realistic, transparent, and prudent planning of power purchase from power exchanges. The petitioner may also be directed to clearly justify exchange-based procurement with proper demand–supply assessment, cost comparisons, and consumer impact analysis, so as to safeguard consumer interests and ensure regulatory discipline.

5.12. Energy Balance

The Petitioner, in Table 36 of the Petition, provides the Energy Balance for FY26 and FY27. We request that the energy balance be revised according to the updated sales projections, considering sales to DF at the input level and revised distribution loss targets. This will ensure more accurate and realistic projections in line with actual conditions and performance targets.

5.13. Power Purchase Cost

The Petitioner, in Table 41 of the Petition, provides the power purchase cost for FY26 and FY27. We request that the Table 41 be revised considering power availability through different NCES like RTS and other decentralised sources. This will ensure more accurate and realistic projections in line with actual conditions.

5.14. Disallow O&M expenses for Distribution Franchises

The Petitioner requests approval for O&M expenses, including sales to the distribution franchises. However, since JVVNL does not undertake O&M in the distribution franchise area, we request the Commission to deny this request and not allow O&M expenses for overall sales that include sales to the distribution franchise area.

5.15. Capital Investment Plan (Institutional Strengthening)

As per the RERC (Investment Approval) Regulation, 2006, Distribution Licensees are permitted to allocate up to 1% of their Investment Plan towards institutional strengthening. Accordingly, the Petitioner should plan and implement training programs and other related initiatives. We request the Petitioner to provide details on action plan for the training and safety of employees along with the amount it is planning to incur for such activities. Furthermore, as per the Commission’s directive, a cost-benefit analysis of the investments made should be conducted and be filed with the said Petition.

5.16. O&M Expenses for Smart Meters

We further request the Petitioner to provide the monthly O&M expenses being incurred per meter along with the benefits observed in the areas where the smart meters are installed and estimates of O&M expenses for smart meters for FY26. Additionally, we request the Petitioner to assess and provide details of the cost reductions due to billing (spot billing charges and the bill collection charges) and collection efficiency gains resulting from the implementation of smart metering. This will help in understanding the financial impact and benefits of the smart meter deployment.

5.17. Discrepancy in Power Procurement Planning

In paragraph 5.50 of the Petition, the Petitioner has stated that it anticipates surplus energy availability from upcoming generation plants and decentralised renewable energy sources and excluded power procurement from short-term sources. However, monthly reports from the Market Monitoring Cell⁷ indicate that Rajasthan has been consistently procuring power from the short-term market each month, raising questions on the Petitioner’s assumption of surplus availability for FY27 (see **Error! Reference source not found.**). It may be noted that Rajasthan purchased a net 2382.78 MU of power from short term sources during June 2025 to August 2025 alone.

Table 2: Month wise short term power procurement by Rajasthan

Month	Net Power Procurement (in MU)
Aug-25	809.30
July-25	694.74
Jun-24	878.74

Furthermore, the Petitioner has stated that any additional power procurement, if required, would be presented at the time of the true-up process. We respectfully submit that such an approach should not be accepted by the Commission. Given the evidence of continuous short-term procurement and the lack of a concrete, forward-looking energy procurement plan, reliance on post-facto justifications undermines regulatory transparency and prudent planning. Accurate and timely power procurement planning should be an integral part of the

⁷ https://www.cercind.gov.in/report_MM-2025.html

tariff Petition to enable the Commission to carry out a meaningful assessment of power availability, cost implications, and consumer impact.

In light of the above, we urge the Commission to direct the Petitioner to submit a detailed and realistic power procurement plan that includes both long-term and short-term sources. Also, ensure that all relevant power purchase information is submitted upfront, and not deferred to the true-up stage.

5.18. Slow Progress in Rural Electrification

Table 40 of the Petition outlines the planned financial outlay for various activities, including the budgeted physical targets related to Rural Electrification Works for FY26 and FY27, with allocations of ₹1,731 Cr. and ₹1,103 Cr. respectively. These targets encompass key objectives such as village electrification and the provision of new electricity connections in rural areas.

In this context, the Petitioner is hereby requested to furnish the circle wise and year wise details of number of households electrified during FY 22 to FY 25. Also, furnish details of circle-wise targets for each of the following components under the Rural Electrification Works programme for FY26 and FY27:

- Village & hamlet Electrification: Specify the number of villages and hamlets proposed to be electrified in each circle
- Release of New Electricity Connections: Indicate number of new rural household or consumer connections planned in each circle
- Provide circle wise list of identified hamlets and villages are yet to be electrified

5.19. Refinancing of Loans

We request the Petitioner to provide detailed plans for refinancing high-interest rate loans with lower interest rates aimed at reducing existing debts.

5.20. Deficiencies in Non-Tariff Income and Asset Monetisation Planning

In Table 50 of the Petition, the Petitioner has projected non-tariff income and other tariff income of ₹479 crore and ₹505 crore, respectively, from various sources. However, the Hon'ble Commission, through its directive dated 24.11.2021, had expressly directed the Discoms to actively explore and implement asset monetisation strategies, including, inter alia, establishment of EV charging stations, utilisation of buildings for advertising hoardings and ATMs, advertisements through portals and mobile applications, and monetisation or sale of unused land at commercially viable locations to local bodies.

Further, the Managing Directors of the Discoms were specifically instructed to personally monitor the implementation of these asset monetisation initiatives, issue appropriate internal guidelines, and submit quarterly compliance reports, detailing circle-wise actions taken and revenues generated. The directive clearly emphasised optimisation of revenue streams through mechanisms such as pole rentals, monetisation of vacant land and buildings, and use of advertisement space on electricity bills.

In this context, the Petitioner was required to submit detailed projections for each identified asset monetisation avenue. However, it is observed that the Petitioner has not adequately reflected revenue from pole rentals, despite repeated emphasis by the Hon'ble Commission in its earlier orders. Notably, in Form 2.4, the Petitioner has neither disclosed the actual revenue from poles for FY 2024–25, nor provided projections for FY 2025–26 and FY 2026–27. This omission reflects non-compliance with the Commission's directions and undermines transparency in non-tariff income estimation. Accordingly, it is requested that the Hon'ble Commission take serious note of this lapse and direct the Petitioner to furnish circle-wise revenue from pole rentals for FY 2024–25, along with a clear plan and projections for the ensuing years.

Additionally, in Form 2.4 of the ARR, the Petitioner has projected income from theft recovery amounting to ₹22.96 crore in FY 2025–26 and ₹24.22 crore in FY 2026–27. Such projections appear speculative in nature, as recovery from theft is inherently uncertain and contingent upon future enforcement actions. The inclusion of predetermined figures under this head raises concerns that such amounts may have been adjusted merely to manage revenue estimates. The Petitioner may therefore be directed to justify and clarify the basis of these projections.

Further, the Petitioner has not provided any projected income on account of rebate on prompt payment for FY 2025–26 and FY 2026–27. In this regard, it is requested that the Hon'ble Commission may consider setting appropriate targets for the Petitioner, based on historical collection efficiency and consumer payment trends. Such targets would not only enhance non-tariff income but also strengthen managerial accountability in revenue realisation.

In view of the above, it is respectfully submitted that the Hon'ble Commission may be pleased to direct the Petitioner to submit a comprehensive asset monetisation report, clearly detailing:

- the inventory of monetizable assets such as land, buildings, poles, and other infrastructure
- the current income derived from each category of assets on a circle-wise basis
- a strategic, time-bound plan to enhance revenue from these assets in line with the Commission's directives

5.21. Voltage-Wise Loss of Supply

The Commission's order dated 31.03.2023 directed the Petitioner to conduct an independent study to calculate voltage-wise losses and voltage-wise cost of supply. Despite the Commission's directive in its order dated 01.09.2022, which required Discoms to submit voltage-wise cost of supply based on actual losses and sales rather than the dispensation allowed by APTEL's judgment, the Petitioner failed to comply.

Despite repeated reminders and opportunities provided by the Commission, the Petitioner still submitted data using the APTEL methodology, which was subsequently rejected by the Commission. We request the Commission to take strict note of the Petitioner's laxity in

fulfilling these obligations and request imposition of penalties, including a reduction in the Annual Revenue Requirement (ARR).

5.22. ToD Tariff for Consumers with Load above 10 kW

Time of Day (ToD) tariff system uses both surcharges and rebates to encourage consumers to shift their electricity usage during off-peak hours. The implementation of a Time of Day (ToD) tariff for consumers equipped with smart meters and having a connected load exceeding 10 kW.

In this regard, the Petitioner is requested to provide a clear explanation of the methodology adopted in designing the ToD tariff structure. Additionally, the Petitioner is also requested to furnish circle-wise and category-wise data on consumers with connected loads above 10 kW, distinguishing between those with smart meters and those without.

5.23. Compensation on SoP Violations

The Commission, in its orders dated 31.03.2023, 26.07.2024 and 03.10.2025, had directed the Petitioner to report all consumer service parameters based on smart meters wherever installed and to immediately pay direct compensation for any violations. Additionally, for other consumers, the Discoms have been mandated to develop a system for the automatic adjustment of compensation in electricity bills and to report this in the formats submitted to the Commission, as well as in the next ARR.

In this regard, we request the Petitioner to provide detailed, circle-wise information on direct compensation disbursed for violations of the standard of performance (SoP). This should include the total number of consumers who have received compensation, and the overall amount disbursed.

5.24. Treatment of Regulatory Surcharge

In Paragraph 8.14 of the petition, the petitioner has projected a revenue surplus of ₹2,830 crore for FY 2025–26 and ₹1,997 crore for FY 2026–27 at existing tariffs. However, it is observed that these surpluses have been computed after accounting for revenue from the Regulatory Surcharge, as reflected in Table 61 of the petition. The Regulatory Surcharge is levied exclusively for the liquidation of accumulated regulatory assets and, therefore, cannot be treated as revenue of the year for the purpose of determining surplus or deficit. The petitioner's treatment of the Regulatory Surcharge as revenue is thus incorrect and inconsistent with established regulatory principles.

Such an approach is contrary to the Ministry of Power's mandate for timely and cost-reflective tariffs and inconsistent with the RERC Tariff Regulations, which require the creation of regulatory assets to be avoided except under exceptional circumstances. It is also at variance with the Hon'ble Supreme Court's recent directions emphasising financial discipline, time-bound recovery of existing regulatory assets, and the avoidance of fresh regulatory asset

creation. By deferring the recognition of current under-recovery, this approach delays necessary tariff correction and perpetuates the accumulation of regulatory assets.

The issue warrants careful consideration by the Hon'ble Commission to ensure adherence to its Tariff Regulations and applicable legal mandates. Regulatory assets have historically become a routine element of tariff determination; restoring their use to a strictly exceptional measure will require clear, deliberate, and proactive regulatory intervention by the Commission. In this context, it is respectfully submitted that the Discoms be directed to explicitly disclose, on a year-wise basis, the opening balance, additions, recoveries, and closing balance of regulatory assets in the present and future petitions.

6. SUBMISSION ON TARIFF RATIONALIZATION

6.1. Rationalization in Levy and Disclosure of FPPAS and Regulatory Surcharge

At present, Fuel and Power Purchase Adjustment Surcharges (FPPAS) are levied on electricity bills as a percentage of the total tariff cost, comprising both fixed and variable charges. This methodology creates ambiguity for consumers in computing the applicable FPPAS for a given month, both at the end-consumer level and in assessing the net recovery on account of power sales by the Distribution Licensee.

In this regard, it is submitted that levying FPPAS on a per-unit (₹/kWh) basis would enhance transparency, ensure uniformity in tariff application, and enable stakeholders to clearly compute the cumulative recovery through FPPAS on the total energy sold by the petitioner.

In view of the above, it is respectfully requested that the Hon'ble Commission may be pleased to direct the petitioner to:

- a)** Provide a detailed break-up of FPPAS and regulatory surcharge levied on electricity bills, clearly reflected in both spot bills and regular bill formats; and
- b)** Publish monthly updates on its website indicating the per-unit FPPAS and regulatory surcharge along with the net monthly recovery.

It is further requested that the petitioner be directed to submit the same monthly data as part of the True-Up filings for the respective years, so as to enable transparent verification and computation by the Hon'ble Commission and other stakeholders.

6.2. Adverse Impact of Merging of NDS Slabs

The Petitioner has proposed the merger of multiple tariff slabs within the Non-Domestic Service (NDS) category for consumers with sanctioned load up to 5 kW, consolidating consumption slabs up to 200 units per month. While such rationalisation may appear administratively convenient, it is likely to have a disproportionate and adverse impact on low-consumption NDS consumers, particularly those currently falling within the up-to-100-units slab, who predominantly comprise marginal shop owners and small commercial establishments—especially in the event of future tariff revisions.

It is pertinent to note that consumers in the up-to-100-units slab (NDS-1) constitute more than five times the number of consumers in the 100–200 units slab (NDS-2). However, the total energy sales to NDS-1 consumers are approximately equal to the energy sales of NDS-2 consumers, as evidenced from Form 2.1 of the ARR formats filed by the Petitioner. This clearly demonstrates that the effective load of NDS-1 consumers is significantly lower than that of NDS-2 consumers (refer ANNEXURE – I). Despite this material difference in consumption characteristics, the proposed slab merger would result in NDS-1 consumers being subjected to the same fixed and energy charges as NDS-2 consumers upon future tariff revisions, thereby imposing an undue financial burden on low-consumption users.

Further, it is observed that the energy consumption by consumers with sanctioned load above 5 kW and monthly consumption up to 100 units is negligible in comparison to the overall non-domestic energy consumption. Retaining a separate slab for this category unnecessarily adds complexity to the tariff structure. Accordingly, it is recommended that this slab be merged with the 100–200 units slab for sanctioned load above 5 kW, as detailed in ANNEXURE – V.

In view of the above, it is respectfully submitted that the existing tariff slab for NDS consumers with monthly consumption up to 100 units and sanctioned load up to 5 kW should be retained. Elimination of this slab under the proposed tariff structure is likely to result in a significant increase in electricity bills for economically weaker shop owners and small commercial establishments, thereby adversely affecting their commercial viability. Protection of low-income and low-consumption consumers from tariff shocks is a core objective of the National Tariff Policy and is essential to ensuring equitable and inclusive access to electricity.

Accordingly, it is respectfully requested that the Hon'ble Commission may be pleased to direct the Petitioner to reconsider the proposed slab restructuring and retain the existing concessional slab for NDS consumers consuming up to 100 units per month with sanctioned connected load up to 5 kW, in order to safeguard the interests of vulnerable consumer segments.

6.3. Effective Fixed Charges and Comparison with Other States

It is important to highlight that under the proposed tariff, both fixed charges and energy charges for small domestic consumers, particularly those consuming up to 50 units per month, are significantly higher in Rajasthan compared to other states such as Gujarat and Maharashtra.

For instance, the fixed charge for Below Poverty Line (BPL) and Astha Card holders in Rajasthan is a steep ₹566/kW/month, calculated based on the average connected load for these consumer categories. In contrast, the corresponding charges in Gujarat and Maharashtra are significantly lower at ₹5/kW/month and ₹34/kW/month, respectively (see Table 3)

Table 3: Comparison of Rajasthan Fixed Energy Charges (as per Proposed Tariff) with Gujarat and Maharashtra Fixed Energy Charges

S. NO	CATEGORY	SUB-CATEGORY	LOAD SLABS	CONSUMPTION SLABS (UNITS/MONTH)	RAJASTHAN (INR/KW/MONTH)	GUJARAT (INR/KW/MONTH)	MAHARASHTRA (INR/KW/MONTH)
1	Domestic	BPL & Astha Card			566	05	34
		Small Domestic		upto 50	126		
		General Domestic		0-50	113		Single phase: INR 128
				50-150	108		Three phase: INR 424
				150-300	137		
				300-500	137		
				500 and above	126		
			over 50 kVA		300		
			<= 2 kW			15	
			2-4 kW			25	
			4-6 kW			45	
			> 6 kW			70	

Source: Author's analysis

6.4. Introduction of Single-Part Tariff for EVCS

The proposal to introduce a single-part tariff for Electric Vehicle Charging Stations (EVCS) is inequitable and discriminatory vis-à-vis other environment-friendly commercial establishments. It is pertinent to note that EVCS typically require a wide range of contracted loads, which may extend up to 50 kVA on the LT network. Such high-capacity loads, owing to their capacitive characteristics at the load side, can adversely affect the power factor and impose additional stress on the distribution infrastructure. This, in turn, may reduce the effective life of distribution lines and transformers and pose challenges to grid stability.

In contrast, other environment-friendly commercial establishments, particularly those that have installed rooftop solar systems for their operations, continue to pay electricity duty on per-unit generation and also contribute to the Petitioner's demand charges, albeit at relatively lower levels. Despite their contribution towards sustainability and grid support, such consumers have not been extended the benefit of a single-part tariff.

In this regard, the Petitioner may be directed to clarify the rationale for extending the benefit of a single-part tariff exclusively to EVCS, while similarly placed eco-friendly commercial establishments with solar installations are excluded from such tariff treatment.

Further, it is respectfully submitted that EVCS are essentially commercial ventures operating for profit. Granting them a single-part tariff would result in under-recovery of fixed costs, which would ultimately be socialised and borne by other consumer categories, thereby violating the principles of cost reflectivity, equity, and non-discrimination.

In view of the above, it is respectfully requested that the Hon'ble Commission may be pleased to reject the Petitioner's proposal to extend a single-part tariff to EVCS. It is further prayed that the Hon'ble Commission may direct the Petitioner to formulate a more balanced and comprehensive policy framework for promotion of EVCS and other environment-friendly sectors, which is cost-reflective, non-discriminatory, and fully aligned with the objectives of the Electricity Act, 2003.

6.5. Removal of Agriculture Flat (un-metered) Category

In paragraph 4.23 of the Petition, the Petitioner has stated that all flat-rate agricultural connections have been successfully converted into metered agricultural connections. Consequently, no energy sales have been projected under the agricultural flat-rate category for FY 2025–26 and FY 2026–27.

In view of the above, and since the flat-rate agricultural category no longer exists in practice, it is submitted that continuation of this category serves no regulatory or operational purpose. Accordingly, it is suggested that the Hon'ble Commission may consider removing the agricultural flat-rate category from the tariff structure, which would help simplify the tariff slabs and enhance transparency.

7. SUBMISSION ON NON-COMPLIANCE OF THE COMMISSION'S DIRECTIVES

The Commission has consistently emphasised the need for performance improvement by the Discoms and has issued specific directives in various past orders, including the most recent tariff order dated 03.10.2025. In that tariff order, the Commission had clearly directed the Managing Directors (MDs) of the Discoms to personally monitor the implementation of each directive and to submit a detailed and pinpointed compliance report outlining the status of compliance with each instruction.

However, despite this explicit directive, the Petitioner has failed to submit the required compliance report along with the current Petition. We request the Commission to take serious note of this non-compliance and direct the Petitioner to immediately submit a comprehensive compliance report, detailing the actions taken and progress achieved against each of the Commission's earlier directives. The Petitioner's true-up petition includes the status of compliance with the Commission's directives, as outlined below:

7.1. EV Charging Infrastructure

In the Tariff Order passed on 26.07.2024 and 03.10.2025, had directed the Discoms to expedite the setting up of EV charging stations and propose necessary investment for upgrading their network for seamless integration of EV infrastructure.

The Petitioner has not provided any information regarding the establishment of an EV Cell to oversee the installation of charging infrastructure. It has only stated that survey work has been completed for 30 units, and that 50 units are sanctioned for implementation up to FY26.

In view of the above, it is respectfully submitted that the Petitioner may be directed to clarify the status of the constitution of the EV Cell. If such a Cell has been established, the Commission may kindly direct the Petitioner to disclose its roles and responsibilities, as well as the steps undertaken to expedite the installation of EV charging stations.

7.2. Medium Term Business Plan

In the previous ARR proceedings, the Petitioner had submitted a medium-term business plan that lacked adequate details on future cost escalation, sector-wise investment requirements, and the overall business outlook. The Hon'ble Commission had specifically directed the Petitioner to submit a comprehensive and detailed medium-term business plan addressing these aspects in the subsequent filing.

However, it is observed that the Petitioner has failed to comply with the said direction, as no such medium-term business plan has been furnished in the present submission. This omission limits the ability of stakeholders and the Hon'ble Commission to assess the Petitioner's long-term financial sustainability, investment planning, and prudence of cost projections.

In view of the above, it is respectfully requested that the Hon'ble Commission may be pleased to direct the Petitioner to submit a complete and detailed medium-term business plan, in compliance with its earlier directions, as part of the present proceedings or at the earliest thereafter.

7.3. Smart Grid and Demand Side Management Cell

The Commission, vide its Order dated 26.07.2024 and 03.10.2025, had directed the Discoms to constitute Smart Grid and Demand Side Management Cell(s) with well-defined roles and responsibilities. The Commission had also directed them to conduct baseline study and develop data to formulate Demand Side Management and Smart Grid Plan/Programme. With the approval of the Commission, the Discoms were to act upon said plans. The Commission had also directed them to develop cost recovery mechanism.

However, the Petitioner has failed to comply with the said directive. While it has created an RE-DSM Cell, the specific roles and responsibilities of the Cell have not been provided in the last compliance report attached with FY24 True-up Petition of the Petitioner. It has also not reported undertaking any baseline study or developed data which would help in formulating Demand Side Management Plan and Smart Grid Plan. Additionally, there is no disclosure of

the development of a cost recovery mechanism. The Petitioner has also not provided any details regarding the implementation of energy efficiency programs or Demand Response programs as part of its DSM planning.

7.4. Franchisee' Performance Audit Report

In the Tariff Order dated 03.10.2025, the Petitioner was directed to furnish the performance audit reports of franchisees, audited by an independent auditor, along with the subsequent ARR Petition and to upload the same on the Petitioner's website. However, while the Petitioner has initiated the tendering process for appointment of the independent auditor, the final performance audit reports have not yet been submitted or uploaded.

7.5. Fixed Assets Register (FAR)

In the Tariff Order dated 26.07.2024 and 03.10.2025, the Commission had directed the Discoms to go through the Report submitted by M/s. RFSDL and take necessary actions 'including those materials in the report to update their process and make asset register as per the requirement of the Regulations'. The report recommends that the Discoms develop a comprehensive financial management and accounting manual. Additionally, the report recommends capacity building exercises for the staff of Discoms, gather their feedback and refine the manual. The report also recommends appointing a third-party for physical verification and also appoint a field-team for cross-verification.

The Petitioner has submitted the FAR till FY24 on its website while FY 2024–25 True Up petition is filed for the approval without having knowledge of fixed assets added during the year. Thereof, the petitioner should submit the manual If the manual for management and accounting has been prepared by the Petitioner, it must be directed to submit the same before the Commission. Additionally, it should also clarify if it has undertaken any capacity building exercises for its staff towards the same and if it has received any feedback from them. Furthermore, it should give the details of third-party appointed for the purpose of physical verification.

The Commission should also direct the discom to disclose detailed steps it has taken towards implementing IT/ERP system for streamlining tasks, improving efficiency and enhancing data accuracy.

7.6. Skill Development and Training

The Hon'ble Commission had earlier directed the Discoms to establish their own skill development and training centres and further mandated that at least 1% of the total capital expenditure (capex) be allocated towards staff skill development and training, including safety training, with due reporting to the Commission along with the subsequent Tariff Petition.

However, the Petitioner has incurred expenditure of only around ₹20 lakh towards employee skill development and training, which is substantially lower than the allocation required for

such huge workforce. Further, the Petitioner has not furnished any detailed report specifying the nature, scope, or coverage of the training programmes conducted.

In view of the above, it is respectfully requested that the Hon'ble Commission may be pleased to direct the Petitioner to upload a comprehensive training and skill development report on its website and also submit the same to the Commission for appropriate scrutiny and compliance verification.

7.7. Disposal of Scrapped Assets

It is observed that a substantial number of the Petitioner's assets have been retired due to planned or unplanned reasons, such as end-of-life or damage, and are presently lying as scrap across various premises. These scrapped assets impose additional security obligations on the engineering staff, occupy valuable storage space, and pose safety and theft risks. Accordingly, the Petitioner may be directed to dispose of such assets in a timely and orderly fashion. The Petitioner may be issued directions to ensure prompt reporting of such assets as they are created, and develop circle-wise Standard Operating Procedures (SOPs) for timely disposal of these assets, mandating their disposal within six months of their retirement.

7.8. Reduction of Losses- Adoption of Circles by MD

In its Order dated 26.07.2024 and 03.10.2025, the Commission directed Discoms that MDs shall continue to furnish information of losses and revenue realised in three circles with the highest losses adopted by the MD/Director, indicating interventions made and outcome in terms of reduction of losses, and with next year ARR they will give a snapshot of losses of FY21 to FY24 (till filing).

In accordance with the directive, the MD of the Petitioner had adopted the Bharatpur, Dholpur, and Dausa circles with the specific objective of reducing distribution losses. Although the Petitioner has submitted distribution loss data in Form D7.2, it is observed that the reported losses in the Dausa Circle remain significantly higher than the Petitioner's average loss level of 15.77%. The Commission is requested to direct the Petitioner to submit a detailed clarification explaining the continued high losses in Dholpur circle despite being adopted for focused interventions.

7.9. Voltage Wise Losses

The Commission had directed vide its Orders dated 01.09.2022, 31.03.2023 and 26.07.2024 that the Discoms to undertake sample study of voltage-wise losses for at least two Nos. 33/11KV urban and two Nos. 33/11 KV rural substations by an independent third-party and associated lines representing proper sample for each circle. It had further directed that the losses of entire circle should be extrapolated based on the sample study and final report be submitted before the Commission within four months of the Order.

However, the Petitioner has failed to provide details regarding the appointment of a third party for undertaking the assessment of voltage-wise losses and has not submitted the corresponding report to the Commission.

In light of this non-compliance, it is respectfully submitted that, as per the directive issued in the Tariff Order dated 26.07.2024, the concerned officer may be held accountable, and appropriate action may be initiated for failure to comply with the Commission's directions.

ANNEXURE – I

Electricity Consumer Category	Connected Load (L _c)	Energy Sold (E _s)	Load Factor (L _f)
Domestic	67,68,261	7,639.13	12.88%
1.DOMESTIC - LT	65,89,067	7,488.45	12.97%
(I.) BPL	1,15,209	330	32.70%
(II.) Small Domestic	14,00,138	414	3.38%
(III.) General Domestic	50,73,720	6,744	15.17%
1. Consumption up to 50 unit per month	8,37,744	99	1.35%
2. Consumption above 50 but up to 150 unit per month	24,61,087	2,080	9.65%
3. Consumption above 150 but up to 300 unit per month	11,04,537	1,606	16.60%
4. Consumption above 300 but up to 500 unit per month	3,98,980	1,107	31.67%
5. Consumption above 500 unit per month	2,71,372	1,852	77.92%
DOMESTIC - HT	1,79,194	151	9.60%
2.Non-Domestic	27,43,892	2,838.15	11.81%
NON-DOMESTIC - LT	17,83,497	1,871.44	11.98%
(I.) Sanctioned connected load up to 5 K.W.	6,70,993	657.86	11.19%
1. Consumption up to 100 unit per month	4,61,323	117	2.90%
2. Consumption above 100 but up to 200 unit per month	1,01,357	115	12.91%
3. Consumption above 200 but up to 500 unit per month	77,242	193	28.53%
4. Consumption above 500 unit per month	31,071	233	85.54%
(II.) Sanctioned connected load above 5 K.W.	11,12,505	1,214	12.45%
1. Consumption up to 100 unit per month	2,20,570	5	0.28%
2. Consumption above 100 but up to 200 unit per month	1,00,154	14	1.64%
3. Consumption above 200 but up to 500 unit per month	2,04,268	68	3.81%
4. Consumption above 500 unit per month	5,87,513	1,125	21.87%
NON-DOM - HT	9,60,395	967	11.49%
3.P.S.L.	81,234	137.29	19.29%
(I)Panchayat & Municipal areas having population less than 1 lac.	80,837	134	18.97%
(II)Panchayat & Municipal areas having population 1 lac. and above	397	3	85.59%
4.AGR(M)	71,84,178	12,049.81	19.15%
(I) Total General (Block Supply)	67,72,203	11,677	19.68%
(II) Total Others & More than block supply	4,11,975	373	10.33%

ANNEXURE – II

Details of accidents occurred in Jaipur Discom and compensation paid in last 04 years

Year	Nigam Employees			Contractor's Employees			Publicman			Animals	
	F	NF	Compensation (in lacs)	F	NF	Compensation (in lacs)	F	NF	Compensation (in lacs)	F	Compensation (in lacs)
2021-22	4	14	108.11	10	9	54.20	479	265	278.70	827	139.13
2022-23	9	23	149.39	10	13	26.61	252	193	335.20	774	98.69
2023-24	2	11	52.33	17	28	98.13	293	256	418.00	857	145.04
2024-25	3	18	50.58	19	32	49.33	401	313	382.77	849	133.54
Total	18	66	360.41	56	82	228.27	1425	1027	1414.67	3307	516.401

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Karmik SECTION
J.V.V.N.L. JAIPUR

ANNEXURE- III

Media Report and Information of Domestic Consumers getting benefit under PM Surya Ghar: Muft Bijali Yojana, as on date 15.12.25

एक्सप्लूजिव सोलर लगने के बाद 100 यूनिट फ्री बिजली मिलेगी, इसकी स्पष्ट गाइड लाइन भी नहीं 1.1 केवी सोलर प्लांट के लिए 2 माह में 13018 आवेदन 5 ही लगे, वजह-शुरुआती खर्च से पीछे हटे उपभोक्ता

रामनिवासासिंह | हनुमानगढ़

पड़ताल: सरकार दे रही 50 हजार सब्सिडी, लेकिन पहले खर्चा 70 हजार

100 यूनिट से बिजली खरब करने वाले उपभोक्ताओं के लिए 1.1 किलोवाट के सोलर पैनल लगाने की योजना उपभोक्ताओं को रास नहीं आ रही। निम्नों की पंचोदयियों के चलते लोगो को यह योजना पसंद नहीं आई। हालांकि इस योजना के तहत जिले में 13018 उपभोक्ताओं ने आवेदन तो कर दिया, मगर इनमें से महज 5 उपभोक्ताओं ने ही अपनी छतों पर सोलर प्लांट लगावाए हैं। इन उपभोक्ताओं को भी अभी तक सब्सिडी नहीं मिली है।

बता दें, अक्टूबर माह में राज्य सरकार ने पीएम सूर्य घर बिजली योजना के तहत 100 यूनिट तक बिजली खरब करने वाले उपभोक्ताओं के 1.1 किलोवाट का निरुलक सोलर पैनल लगाने के लिए योजना शुरू की थी। इसमें सहमति देने वाले उपभोक्ताओं को सोलर सिस्टम लगाना था। लेकिन बैंड और उपभोक्ता अब यह सोलर सिस्टम लगाने में दिलचस्पी नहीं दिखा रहे। धाकर ने इसकी वजह जानी तो सामने आया कि शुरू में बताया गया था कि योजना के तहत निरुलक सोलर सिस्टम उपभोक्ताओं के घरों पर लगाया जाएगा, लेकिन बाद में पता लगा कि ऐसा सोलर सिस्टम लगाने के लिए उपभोक्ताओं को अपनी जेब से 70 हजार रुपए पहले खर्च करने होंगे। फिर योजना के तहत बैंड व राज्य सरकारों की तरफ से कुल 50 हजार रुपए की सब्सिडी उपभोक्ताओं के खाते में भेजी जाएगी। महज 100 यूनिट मासिक बिजली में गुंजाय करने वाले उपभोक्ता 70 हजार रुपए की एकमुश्त राशि खर्च करते में साम्य नहीं होते। ऐसे जिन उपभोक्ताओं ने योजना की सुझाव में बढ़ी उम्मीदों से आवेदन किए थे, बाद में उन्हें पता लगा कि 70 हजार रुपए पहले खर्च करने होंगे और सब्सिडी आने का कोई निर्धारित समय नहीं है।

इसके अलावा यह भी स्पष्ट नहीं है कि सोलर प्लांट लगाने के बाद उन्हें राज्य सरकार से पूर्व में मिल रही 100 यूनिट निरुलक बिजली का लाभ मिलेगा या नहीं। इस कारण उपभोक्ताओं ने सोलर सिस्टम लगाने से खय खींच लिया। कुछ दिनों के प्रयासों के बाद बैंडर्स ने भी ऐसे उपभोक्ताओं के चक्कर काटना बंद कर दिया। वर्तमान में तो यह योजना ठंडे बस्ते में ही है।

70 हजार रुपए के सोलर सिस्टम पर बैंड को 5-7 हजार रुपए की बचत होती है। कगानी खानापुरी 3 व 5 किलोवाट के बरामबर होती है। तीन किलोवाट व 5 हजार रुपए के सोलर सिस्टम को 25-30 हजार रुपए बचते हैं। इस कारण बैंडर्स ने रुचि नहीं दिखाई। कम उपभोगा वाले उपभोक्ता 70 हजार रुपए एक साथ खर्च करने की स्थिति में नहीं है। पीएम सूर्य घर योजना के तहत 1.1 किलोवाट का सोलर सिस्टम लगाने पर बैंड सरकार की ओर से 33 हजार रुपए व राज्य सरकार की ओर से 17 हजार रुपए सब्सिडी दी जाती है। लागत अधिक होने से गरीब तबके के उपभोक्ता सोलर सिस्टम लगाने का खर्च बंदन नहीं कर पा रहे। वे सब्सिडी मिलते ही बैंडर्स को भुगतान करने का बायद करते हैं, जबकि बैंडर सोलर सिस्टम लगाने से पहले पूरा खर्च लेना चाह रहे हैं। सब्सिडी उपभोक्ता के खाते में ही आणी। ऐसे में बैंडर्स को यह बंद रहता है कि बाद में उपभोक्ता रशि देने से मुक्त सकता है।



राज्य सरकार की गाइड लाइन के अनुसार सोलर पैनल में लगाने वाले मीटर डिस्कॉम को देने होते हैं, जो उपलब्ध नहीं है। अगर उपभोक्ता खुद मीटर खरीदे, तो उनके लिए यह प्रोजेक्ट काफ़ी महंगा हो जाता है। अगर सरकार ये मीटर उपलब्ध करा दे, तो उपभोक्ताओं को फैनल लगाना सरता हो सकता है। इस स्थिति के तहत राज्य सरकार की ओर से मिलने वाली 17 हजार की सब्सिडी अभी तक किसी भी उपभोक्ता के खाते में नहीं आई है। इसलिए उपभोक्ताओं इस योजना में रुचि नहीं ले रहे।

बजट में फ्री 150 यूनिट की घोषणा, जिले में 1 लाख 71 हजार 216 लोग थे पात्र

अशोक गहलोत सरकार ने मुख्यमंत्री निरुलक बिजली योजना का वयाग बढ़ाते हुए 2023 में फलू उपभोक्ताओं को 100 यूनिट बिजली देना शुरू किया था। इसमें जिले के कई फलू उपभोक्ताओं के बिजली बिल शून्य हो गए थे। जिले में 1 लाख 71 हजार 216 उपभोक्ता इसके दायरे में आ रहे हैं। इस योजना से सरकार पर आर्थिक भार बढ़ रहा है। जनहित से जुड़ी इस योजना को भजनतालत सरकार बंद करने का ऑडिशन भी नहीं लेना चाहती। इसलिए इस साल 19 फरवरी को पेशा बजट में उन्होंने मुख्यमंत्री निरुलक बिजली योजना से जुड़े उपभोक्ताओं को 150 यूनिट प्रतिमाह निरुलक बिजली देने की घोषणा की। इसके तहत 100 यूनिट उपभोग वाले पहले से पंजीकृत उपभोक्ताओं के घरों में सोलर लगाए जाने हैं।

भास्कर एक्सपर्ट
आरके गर्ग, रिटायर्ड एक्स्पर्ट



राज्य सरकार की गाइड लाइन के अनुसार सोलर पैनल में लगाने वाले मीटर डिस्कॉम को देने होते हैं, जो उपलब्ध नहीं है। अगर उपभोक्ता खुद मीटर खरीदे, तो उनके लिए यह प्रोजेक्ट काफ़ी महंगा हो जाता है। अगर सरकार ये मीटर उपलब्ध करा दे, तो उपभोक्ताओं को फैनल लगाना सरता हो सकता है। इस स्थिति के तहत राज्य सरकार की ओर से मिलने वाली 17 हजार की सब्सिडी अभी तक किसी भी उपभोक्ता के खाते में नहीं आई है। इसलिए उपभोक्ताओं इस योजना में रुचि नहीं ले रहे।

सीधी बात
आरुण धारण, एडॉ, हनुमानगढ़

स्पष्ट गाइड लाइन हमारे पास नहीं आई है।
सब्सिडी- सोलर पैनल में खूब होने वाले मीटर भी डिस्कॉम उपलब्ध नहीं करता था, जिससे उपभोक्ताओं को यह प्रोजेक्ट महंगा लग रहा है?
जवाब- इसमें दो तरह के मीटर लगते हैं, एक सोलर मीटर और दूसरा नेट मीटर। हमारे पास स्मार्ट मीटर है, जो नेट मीटर का ही काम करेगा। दूसरा उपभोक्ता को खरीदना पड़ेगा।

Sub: Regarding providing information under Right to Information Act 2005.
Ref: Online Application Number 124552807359330 Dated 16.12.2025.

On the above cited subject and reference vide which certain information were sought by the Right to Information Act 2005, through the application number 124552807359330 the information sought are as under received on dated 16.12.2025:

S. No.	Question	Answer
1	Numbers of domestic's consumers successfully registered consumers for 150 units tariff subsidy under PM Surya Ghar Yojana (with updated date)	As per the latest available records, a total of 6,441 domestic consumers has been successfully registered under the 150 Units Tariff Subsidy component of the PM Surya Ghar: Muft Bijali Yojana, as on date 15 Dec 2025.
2.	Sub-category-wise numbers of domestic consumers registered for the 150 units tariff subsidy under PM Surya Ghar Yojana, specifically under the following categories: 1. BPL & Aastha Card Holders (0-50 units /month). 2. BPL & Aastha Card Holders (0-50 units /month) in TSP & Shariya Area. 3. Small Domestic Consumers (10-50 units/month). 4. General Domestic Consumers (0-50 units/month). 5. BPL & Aastha Card Holders, Small Domestic Category and all other General Domestic Categories (51-100 units/month). 6. All other General Domestic Categories (51-150 units/month). 7. All other General Domestic Categories (more than 100 units/month). 8. All other General Domestic Categories (more than 150 units/month).	Sub-category-wise, numbers of domestic consumers registered for the 150 units tariff subsidy under PM Surya Ghar Yojana, specifically under the following categories: 1. Such records are not maintained in this office. 2. Such records are not maintained in this office. 3. Such records are not maintained in this office. 4. General Domestic Consumers-113 (0-50 units/month). 5. Such records are not maintained in this office. 6. All other General Domestic-2925 Categories (51-150 units/month). 7. All other General Domestic Categories-5019 (more than 100 units/month). 8. All other General Domestic Categories-3403 (more than 150 units/month).
3	Sub-category-wise details of current energy charges and tariff subsidy applicable on energy charges for domestic consumers registered for 100 units tariff subsidy under Mukhyamantri Nishulk Bijli Yojana and PM Surya Ghar Yojana.	Not relevant and information may not be provided.

Superintending Engineer (PMSG)
Jaipur Discom, Jaipur.

ANNEXURE – IV

Information regarding Demand Note (DN) Deposited and Wells Energised in AG General Category during FY 21 to FY 25

Annexure - 'B'
Point No. B (285)

DISTT/DISCOM WISE AG D.N DEPOSITED 2020-21 TO 2024-25
FOR THE FINANCIAL YEAR 2020-2021 to 2024-25

S.N	NAME OF CIRCLE	During 2020-2021	During 2021-2022	During 2022-2023	During 2023-2024	During 2024-2025	Total
JAIPUR DISCOM							
1	Alwar	5224	2438	6904	3984	989	19539
2	Bhiwadi				2513	565	3078
3	Bharatpur	3036	1072	6077	3894	460	14539
4	Deeg				2336	554	2890
5	Dholpur	813	74	863	831	54	2635
6	Dausa	1375	485	2498	2469	647	7474
7	Karauli	1191	315	2052	1786	186	5530
8	Jpdc north	2343	1370	4179	1781	328	10001
9	Jpdc south				1635	578	2213
10	Dudu				1167	431	1598
11	Kotputli				2963	557	3520
12	Jhalawar	2983	292	3070	4467	379	11191
13	Baran	2549	749	1791	3382	959	9430
14	Kota	1384	388	2675	5042	553	10042
15	Bundi	3007	943	5443	7685	1102	18180
16	SWM	2582	1042	3834	3145	690	11293
17	Gangapurcity				1835	159	1994
18	Tonk	2600	1531	4068	6160	1180	15539
	Total JPD	29087	10699	43454	57075	10371	150686

Note :- D.N deposited of all ag category, category wise d.n deposition information is not maintained by this office.

प्रमाणित स्वयं प्रतिलिपी
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अधीक्षण अभियन्ता (आर. ई.)
ज. वि. वि. लि., जयपुर

Annexure - 'C'
Point No. B (356)

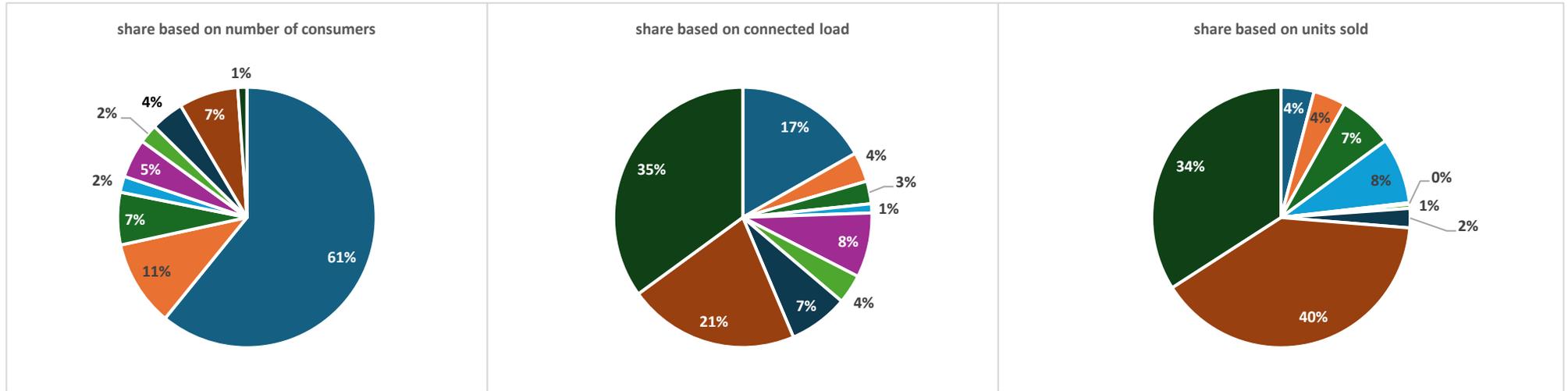
DISTT/DISCOM WISE AG GEN ENERGISED OF WELLS
FOR THE FINANCIAL YEAR 2020-2021 to 2024-25

S.NO.	NAME OF CIRCLE	During 2020-2021	During 2021-2022	During 2022-2023	During 2023-2024	During 2024-2025	Total
(A) JAIPUR DISCOM							
1	ALWAR	836	2642	2331	2797	1496	10102
2	BHIWADI				1638	741	2379
3	BARAN	484	1028	455	1116	972	4055
4	BHARATPUR	74	1216	1651	2471	1431	6843
5	DEEG				1895	860	2755
6	BUNDI	298	879	1252	3019	3010	8458
7	DAUSA	227	689	1192	1243	1390	4741
8	DHOLPUR	49	479	204	534	351	1617
9	JPDC NORTH	159	807	1768	656	772	4162
10	JPDC SOUTH				609	546	1155
11	DUDU				374	323	697
12	KOTPUTLI				1547	1099	2646
13	JHALAWAR	111	2301	1582	2818	1303	8115
14	KOTA	179	966	811	1907	2149	6012
15	S.MADHOPUR	786	1320	899	2707	1023	6735
16	GANGAPURCITY				874	605	1479
17	TONK	82	913	927	3193	1811	6926
18	KARAU LI	88	587	609	935	1139	3358
	SUB-TOTAL(A)	3373	13827	13681	30333	21021	82235

प्रमाणित स्वयं प्रतिलिपी
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अधीक्षण अभियन्ता (आर. ई.)
ज. वि. वि. लि., जयपुर

ANNEXURE – V

Consumer Share Analysis for Non-Domestic Category



- Consumption upto first 100 units per month (upto 5KW)
 - Consumption above 100 units and upto 200 unit per month (upto 5KW)
 - Consumption above 200 unit and upto 500 units per month (upto 5KW)
 - Consumption above 500 units per month (upto 5KW)
 - Consumption upto first 100 units per month (above 5KW)
 - Consumption above 100 units and upto 200 unit per month (above 5KW)
 - Consumption above 200 unit and upto 500 units per month (above 5KW)
 - Consumption above 500 units per month (above 5KW)
 - HT-Non- Domestic (HT-2), For contract demand over 50 KVA (All units)
- Legend Entry 6

Author analysis: Based on data available in Form 2.1 of True-Up for FY 2024-25 of JVVNL