

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



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## 1. INTRODUCTION

Jodhpur Vidyut Vitran Nigam Limited (JdVVNL) 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 JdVVNL 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 Website<sup>1</sup> 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,

<sup>1</sup> 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 website<sup>2</sup>.

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 30<sup>th</sup> 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.

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<sup>2</sup> Press Release Section of Petitioner's Website: <https://energy.rajasthan.gov.in/JdVVNL/#/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 Jodhpur 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 12 districts of the State of Rajasthan. Conducting the presentation exclusively at the

Headquarter Office in Jodhpur 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.

#### 2.1.6. Petition Uploaded in Scanned Formats

It has been observed that the DISCOMs have been submitting petition documents that are unclear and not easily readable. This not only hinders stakeholder participation but also limits

stakeholders' ability to analyse the content and offer constructive feedback. Submission of documents in a machine-readable text format is essential to ensure transparency and facilitate an effective and meaningful review process. The Commission has directed Discoms in its orders dated 14.07.2022 and 01.09.2022 to improve the accessibility and format of petition documents on their websites. Specifically, Discoms were instructed to upload readable PDF and Excel formats along with signed copies of petitions and ensure that files are in searchable formats such as Word, Excel, or PDF. Despite this, it has been observed that while JVVNL and JDVVNL have adhered to the Commission's directive, the documents submitted in the current petition are in the form of scanned PDFs, which are not machine-readable.

We request the Hon'ble Commission to take serious note of the deficiencies in the quality of the petition documents provided by the petitioner for stakeholder consultation and to direct the petitioner to submit machine-readable copies of the petition, along with the supporting data in spreadsheet formats, to enable meaningful analysis and effective stakeholder participation.

## 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.



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-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 4).

| Form D 3.4                    |                                       |                                     |                     |                                     |         |
|-------------------------------|---------------------------------------|-------------------------------------|---------------------|-------------------------------------|---------|
| Transmission Charges          |                                       |                                     |                     |                                     |         |
| Name of Distribution Licensee |                                       | Jodhpur Vidyut Vitran Nigam Limited |                     |                                     |         |
| Licensed Area of Supply       |                                       | Jodhpur                             |                     |                                     |         |
| Year                          |                                       | FY 2024-25                          |                     |                                     |         |
| (Figures in Rs Cr)            |                                       |                                     |                     |                                     |         |
| S. No.                        | Name of Transmission Network Provider | Contracted Capacity<br>(MW)         | Transmission Tariff | Transmission Charges<br>(Rs. Crore) | Remarks |
| 1                             | 2                                     | 3                                   | 4                   | 5                                   | 6       |
| 1                             | PGCIL                                 | 1,907.84                            |                     | 826.44                              |         |
| 2                             | MARU TRANSMISSION                     |                                     |                     | 13.31                               |         |
| 3                             | Aravali Transmission services         |                                     |                     | 8.21                                |         |
| 6                             | RVPNL                                 | 6,315.09                            | 156.89              | 1,187.62                            |         |
| 7                             | Hadoti                                | -                                   |                     | 16.51                               |         |
| 8                             | Thar Power                            | -                                   |                     | 11.86                               |         |
| 9                             | Barmer power                          | -                                   |                     | 13.22                               |         |
| 10                            | POC Charges                           | -                                   |                     | 9.66                                |         |
|                               | <b>Total</b>                          | <b>8,222.42</b>                     |                     | <b>2,086.84</b>                     |         |

Figure 4: 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 JDVVNL 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<sub>c</sub> 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 by<sup>3</sup>
  - 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 GD3, 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. Specifically, for flat rate connections category (LT-4) that is 1108.59%. This not possible, and they are likely because of energy accounting issues. The petitioner is requested to explain the same.

Additionally, the petitioner has lots of discrepancies in Form 2.1 related with numbers. For instance, -0.18 MUs energy sales has been provided by the petitioner for consumption up to 100 units per month for NDS category above 5 KW sanctioned load. Further, for cumulative category wise sanctioned load and energy sales not provided by the petitioner.

The petitioner is requested to provide clarifications and correct data 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.

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<sup>3</sup> 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.

- 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.

### 3.6. Distribution and AT&C Losses

Despite the implementation of multiple initiatives, the distribution and AT&C losses of the petitioner remain significantly higher than the levels approved by the Hon'ble Commission. The actual distribution loss reported is 20.10% and the AT&C loss is 21.44%. These levels substantially exceed normative benchmarks and indicate persistent inefficiencies in network management, inadequate energy accounting, and weak enforcement of operational and commercial controls. Further, such elevated losses materially inflate power procurement expenses and undermine the principles of economic efficiency and prudence in utility operations.

In view of the above, it is requested that the petitioner be directed to submit circle-wise details of the loss reduction initiatives undertaken, along with a comprehensive progress report linking each initiative to measurable and objective outcomes, supported by clear implementation timelines. The petitioner may also be directed to specifically highlight focused and targeted measures adopted for high-loss circles, so as to enable effective regulatory oversight and assessment of the efficacy of loss reduction efforts.

### 3.7. 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 JDVVNL, 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*

| <b>S. No.</b> | <b>State</b>   | <b>Transmission Loss</b> | <b>FY</b> | <b>Source</b>                              |
|---------------|----------------|--------------------------|-----------|--|
| 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.

### 3.8. 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 5). 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 three 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.

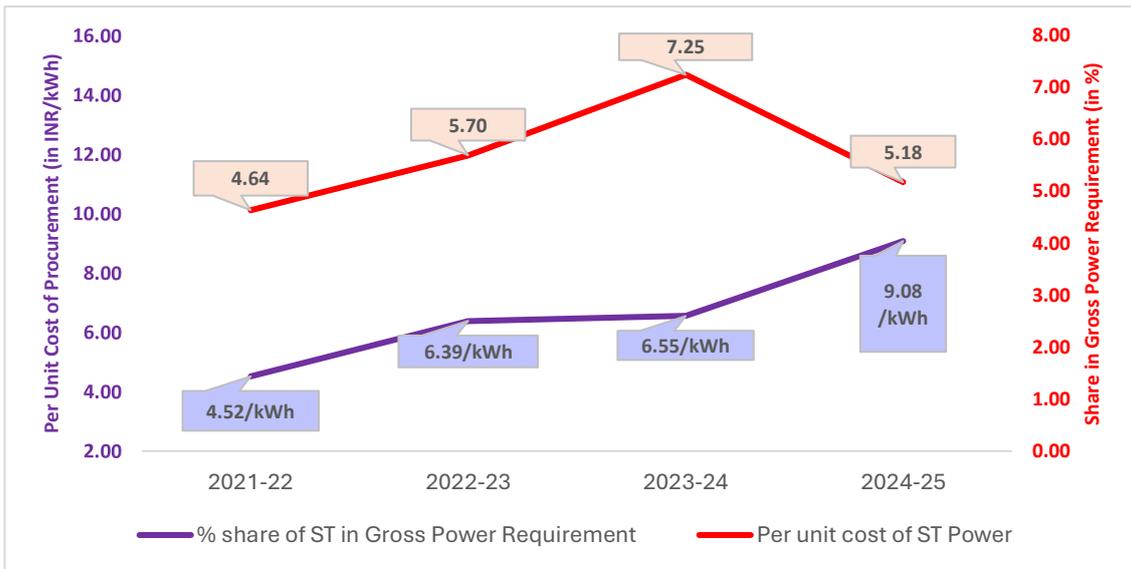


Figure 5: Year-wise per unit cost of ST power and share of ST power in gross power requirement

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.

### 3.9. 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 (see Figure 6).

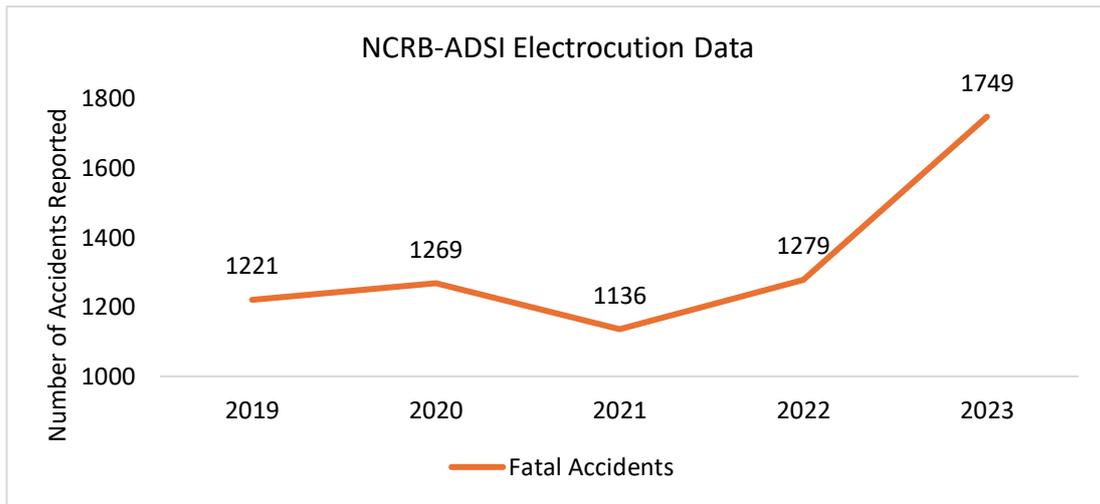


Figure 6: Electrocutation Cases in the State

In view of the above, it is requested that the petitioner be directed to furnish detailed information on the number of fatal and non-fatal electrical accidents involving both contractual and permanent employees within the petitioner’s operational area during FY 2024–25. Further, the petitioner may also be directed to provide details of the specific initiatives, safety protocols, training programs, and preventive measures undertaken to mitigate and prevent such accidents.

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.

### 3.10. Discrepancies in Reported Distribution Losses

Upon examination of True-Up Form D-7.1, it is observed that the distribution losses reported for the Sriganaganagar + Anoopgarh Circle, Balotra Circle, and 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 the Sriganaganagar + Anoopgarh Circle and Balotra Circle, and to furnish category-wise energy sales 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 more than half of the petitioner’s circles are operating with distribution losses exceeding 20%. Additionally, none of the circles has achieved the targeted distribution loss level of 15%, as approved by the Hon’ble Commission. This reflects persistent

inefficiencies in loss management and underscores the need for focused and outcome-oriented interventions, particularly in high-loss circles.

Moreover, the petitioner has not furnished complete and consistent data 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, in the interest of efficiency, transparency, and consumer welfare.

### 3.11. Non-Disclosure of Consumer Awareness Expenses

The Petitioner, in Table 9 of the Petition (see pg. 29-30), provides a breakdown of A&G expenses for FY 2024-25. However, the petitioner did not disclose the expenses on consumer awareness that is very important to engage with consumers for coordination and correlation.

Consumers are one of the most important stakeholders of the power sector and their awareness is important for healthy functioning of the Discoms. 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.

### 3.12. Significant Deviations in R&M Expenses

As per Table 5 of the petition (refer page 27), the petitioner has reported actual Repair and Maintenance (R&M) expenses of ₹531 crore for FY 2024–25, as against the approved amount of ₹159 crore, resulting in an excess of ₹372 crore. The petitioner has stated that the major portion of these expenses was incurred towards repair and maintenance of plant and machinery, Fault Repair Teams (FRTs), and the lines and cable network during the year.

In view of the significant deviation from the approved R&M expenditure, it is requested that the petitioner be directed to provide a detailed explanation for its inability to prudently plan and forecast R&M requirements for the distribution network. The petitioner may also be directed to furnish a circle-wise break-up of the R&M expenses incurred, along with details demonstrating how such expenditure has translated into tangible improvements in system reliability and other key performance indicators, such as reduction in outages, improvement in SAIFI/SAIDI, or reduction in consumer complaints.

Further, with specific reference to FRT-related expenses, it is requested that the petitioner be directed to submit circle-wise details of the deployment of Fault Repair Teams in each circle

and their scope of work. Such information is necessary to assess the prudence, efficiency, and effectiveness of the R&M expenditure claimed by the petitioner.

### 3.13. Insurance Expenses

The Petitioner, in Table 12 of the Petition (see pg. 31), shared Insurance Expenses FY 2024-25, specifying actual insurance expenses as ₹0.50 Cr. against the approved insurance expenses of ₹26 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.

### 3.14. Depreciation

In Table 14 of the Petition (see pg. 32), the Petitioner reports depreciation for FY 2024-25, with actual depreciation of ₹1,091 Cr. compared to the approved amount of ₹706 Cr. We request the Petitioner to provide the reasons for this significant deviation and a detailed breakdown of asset calculations and depreciation methodology.

### 3.15. Compensation for Injured/ Death of Employees and Outsiders

The Petitioner, in Table 15 of the Petition (see pg. 32), 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 ₹7.02 Cr. 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.

### 3.16. Circle-Wise Details of Rebate Provided to Consumers

In Table 15 of the Petition (see pg. 32–33), the Petitioner has reported rebates granted to consumers for FY 2024-25 of ₹ 140.12 Cr. We request the Petitioner to provide a circle-wise and category-wise breakdown of the beneficiaries and the corresponding waiver amounts.

### 3.17. Bad Debt

The petitioner, in Table 16 of the petition (refer page 33), has reported “bad debts” amounting to ₹490.23 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.

### **3.18. Revenue From Use of Pole**

The Petitioner, in Table 17 of the Petition (see Page 30), has provided details of non-tariff and other tariff income for FY 2024-25, specifying revenue from the use of poles as ₹ 10.35 Cr. We request the Petitioner to furnish circle-wise data on both realised and unrealised non-tariff income from pole rents, along with details on the number of poles utilised.

### **3.19. Increase in Sales of Railway Traction**

The energy approved for 'Railway Traction' category was 43 MU, while reporting that 52 MU of actual energy was sold to this category (see Table 02 at Page 08 of the Petition) that is more than 20% sale of the approved sale. The Petitioner is requested to clarify the high demand to Railway Traction.

Additionally, we seek clarification regarding the status of the Railway as an open access consumer. We request the Petitioner to provide details on the units purchased by the Railway through open access and those procured from the Petitioner.

### **3.20. 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. For other consumers, the Discom is to institute a system for direct compensation and report the same in the formats submitted to the Commission as well as along with 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. This should include the total number of consumers who received such compensation and the overall amount disbursed.

### **3.21. Revenue Deficit**

The Petitioner has submitted in Paragraph 3.76 and Table 22 (see pg. 41) the details of 'Revenue Surplus/Deficit for FY 2024-25', where the net revenue gap stands at ₹188Cr. 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 1.4 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 25<sup>th</sup> 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 JDVVNL'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 the difference between figures of accounts and MIS consumers ledger of consumer security deposits and meter security deposits. The accuracy and correctness of the balances reported under these heads is not ascertainable.

### **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.

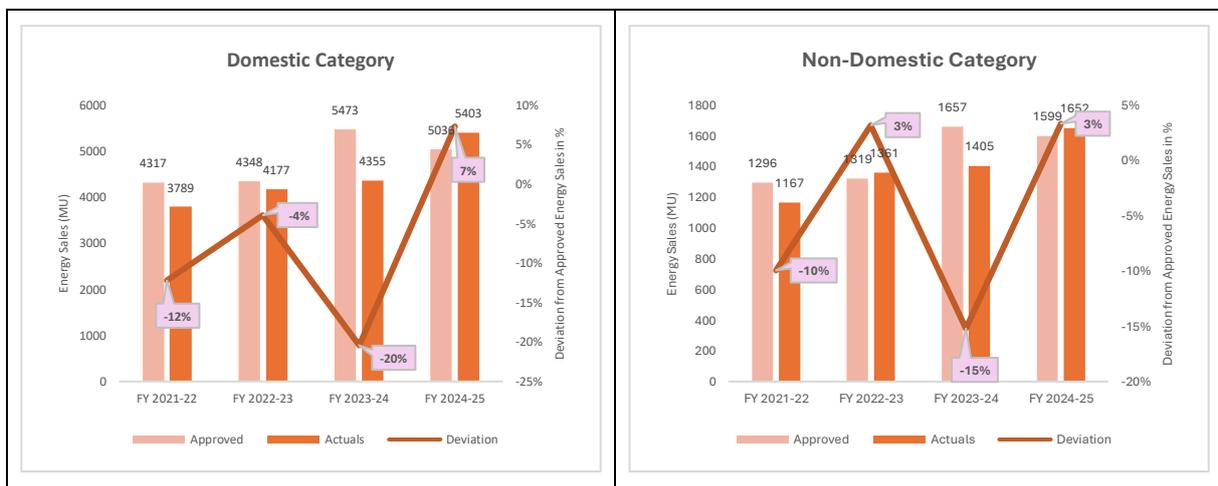
Given its significance, it is recommended that the Petitioner be directed to appropriately compute and include a claim for Return on Equity in accordance with the applicable regulatory guidelines.

## 5.2. Projection of Energy Sales

### 5.2.1. Projection of Category wise Energy Sales

In Table 9 of the Petition, the Petitioner has projected category-wise energy sales for FY 2025-26 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 7). 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.



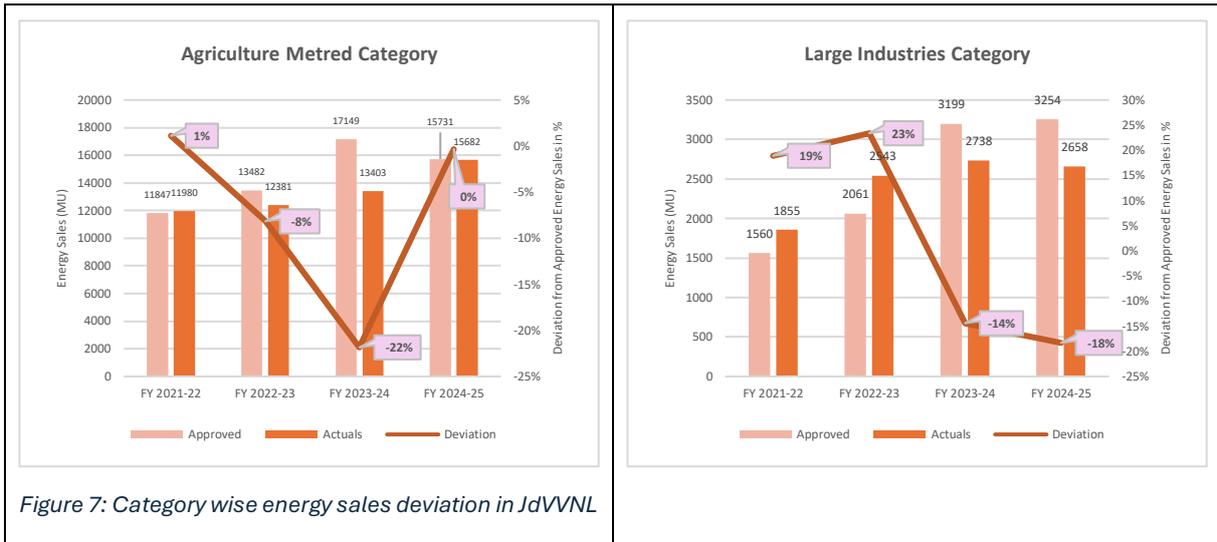


Figure 7: Category wise energy sales deviation in JdVVNL

We request the adoption of a more robust methodology for forecasting energy sales. The Petitioner may consider following the Central Electricity Authority’s (CEA)<sup>4</sup> 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 JdVVNL and its distribution franchises. However, in paragraph 4.43, the petitioner merges the sales to consumers in JdVVNL’s area with those of the DF areas. Consequently, the sales projections

<sup>4</sup> [https://cea.nic.in/wp-content/uploads/ps\\_I/2023/07/Guidelines\\_for\\_Medium\\_and\\_Long\\_Term\\_Demand\\_Forecast-1.pdf](https://cea.nic.in/wp-content/uploads/ps_I/2023/07/Guidelines_for_Medium_and_Long_Term_Demand_Forecast-1.pdf)

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 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 Bijali 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 per media reports (refer **Error! Reference source not found.**), the adoption of the scheme by small domestic consumers—particularly those interested in installing approximately 1.1 kW rooftop solar (RTS) systems—remains very low. One of the primary reasons for poor uptake is the requirement of an upfront payment of approximately ₹70,000 by the consumer, which is to be reimbursed at a later stage. Additionally, the cost of the meter is also being borne by the consumers. Owing to these high upfront installation costs, marginal and small domestic consumers are effectively excluded from availing the benefits of the scheme.

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. Distribution and AT&C Losses Reduction

In FY 2024-25, the Petitioner failed to meet the approved distribution loss target, recording actual losses of 20.10% against the approved level of 15%. This significant deviation raises concerns about the Petitioner’s ability to achieve the proposed distribution loss targets and calls into question the effectiveness of the measures outlined for improving operational performance and consumer satisfaction. The Petitioner’s performance has been consistently unsatisfactory, with distribution losses consistently exceeding the levels approved by the Commission over the past several years. (see Figure 8). We request the Petitioner to provide a detailed explanation for its past failures in meeting approved targets, along with information on the additional measures being undertaken to ensure improved performance going forward.

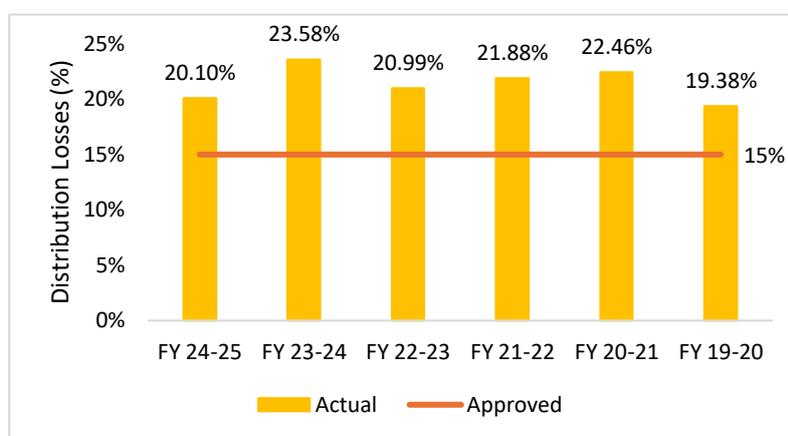


Figure 8: High distribution losses of JdVVNL from its approved losses of 15%

In addition to this, as per the True-Up for FY 2024-25, the AT&C (Aggregate Technical and Commercial) losses remain significantly high at 21.44%, whereas under the Revamped Distribution Sector Scheme (RDSS), the target is to reduce AT&C losses to the range of 12% to 15% by FY 2024-25. However, despite the clearly defined objective under the RDSS, the Petitioner has projected a significantly higher AT&C loss level of 18% for FY 2024-25. This deviation may result in only partial realization of the scheme’s benefits, which must be duly accounted for in the Petition.

Therefore, we request the Petitioner to submit circle-wise details of the loss reduction initiatives proposed, along with each initiative’s intended outcomes and corresponding implementation timelines. The Petitioner should also specifically highlight targeted efforts in high-loss circles.

#### 5.5. Pending Agriculture Connections

In the Rajasthan State Budget for the FY26, the government announced a provision for 50,000 new electricity connections under the agriculture category. The same is critical to support the agricultural sector and address the increasing demand for reliable power supply among farmers. However, it appears to be a significant backlog in the actual release of agriculture connections. It has also been reported and observed that many applicants, despite having duly

submitted demand notices and fulfilled the necessary formalities, are still awaiting the release of their agricultural connections. For instance, deposited Demand Receipts in 2023 but Agricultural Connections Yet to Be Released as on 06.01.2026 (see **Error! Reference source not found.**).

Considering the above, it is requested that the petitioner be directed to furnish a detailed circle-wise status of pending agricultural connections, including the exact number of applications, the current stage of processing, reasons for pendency or delay, and the expected timelines for release of connections.

It is further respectfully requested that the Hon'ble Commission may be pleased to direct the petitioner to provide a detailed explanation for such prolonged pendency and to ensure that the pending agricultural connections are released at the earliest, in a time-bound manner, in the interest of affected consumers.

## 5.6. 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 section 4.57 of 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.

## 5.7. 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.

## 5.8. 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 Jodhpur 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 Gujarat<sup>5</sup>, 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.

### 5.9. New Capacity Addition

In Table 35 of the Petition, the Petitioner has outlined the details of new capacity additions planned for Rajasthan Discoms in FY27, totalling 1,937.17 MW. Additionally, approx. 3000 MW capacity is expected to be commissioned under KUSUM-C scheme 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.

Moreover, the Petitioner has not provided critical project-level details, such as the names and locations of the specific solar power plants from which energy is proposed to be contracted.

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.

### 5.10. Source wise Energy Availability

In Table 37 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.

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

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<sup>5</sup> <https://cgrf.guvnl.com/>

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 1,698 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.

#### 5.11. Energy Balance

The Petitioner, in Table 38 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.

#### 5.12. 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.

#### 5.13. Disallow O&M expenses for Distribution Franchises

The Petitioner requests approval for O&M expenses, including sales to the distribution franchises. However, since JdVVNL 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.

#### 5.14. 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.

### 5.15. 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.

### 5.16. 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 Cell<sup>6</sup> 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

| <b>Month</b> | <b>Net Power Procurement<br/>(in MU)</b> |
|--------------|--|
| 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 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,

<sup>6</sup> [https://www.cercind.gov.in/report\\_MM-2025.html](https://www.cercind.gov.in/report_MM-2025.html)

ensure that all relevant power purchase information is submitted upfront, and not deferred to the true-up stage.

### 5.17. Slow Progress in Rural Electrification

Table 42 of the petition presents the planned financial outlay for various activities, along with the corresponding physical targets under Rural Electrification Works and RDSS electrification of rural households for FY 2025–26 and FY 2026–27. These targets include key objectives such as village electrification and the release of new electricity connections in rural areas. However, despite the allocation of funds and stated targets, the progress of rural household electrification under various schemes remains very slow. A substantial number of rural habitations continue to remain unelectrified, with approximately 1,62,805 hamlets yet to be electrified within the petitioner’s area of operation (see **Error! Reference source not found.**).

In this context, it is requested that the petitioner be directed to furnish detailed, circle-wise targets for the following components under the Rural Electrification Works programme for FY 2025–26 and FY 2026–27:

- a) **Hamlet Electrification** – specifying the number of villages proposed to be electrified in each circle;
- b) **Release of New Electricity Connections** – indicating the number of new rural household or consumer connections planned in each circle.

In view of the above, it is respectfully requested that the Hon’ble Commission may be pleased to review the petitioner’s past performance in rural electrification and issue strict and time-bound directions to ensure planned, effective, and expeditious electrification of remaining rural households, in furtherance of universal access to electricity and consumer welfare objectives.

### 5.18. 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.

### 5.19. Non- Tariff and Other Tariff Income

The Commission, through its directive dated 24.11.2021, has instructed Discoms to explore and implement asset monetisation strategies, including setting up EV charging stations, utilising buildings for advertising hoardings and ATMs, leveraging advertisements on portals/apps, and considering sale of unused lands at commercial locations to local bodies.

The Managing Directors of the Discoms were specifically instructed to personally oversee the implementation of asset monetisation initiatives, issue the necessary guidelines, and submit quarterly compliance reports detailing the actions undertaken and the revenue generated, on a circle-wise basis. The directive emphasised the importance of optimising revenue streams through various means, including pole rentals, monetisation of vacant lands and buildings, and utilisation of advertisement space on electricity bills.

In this context, the Petitioner was requested to provide projections for each of these asset monetisation avenues. However, the Petitioner has only submitted projected revenue from pole rentals for FY26 and FY27, which reflect a marginal increase over the actual revenue for FY25, amounting to just ₹10.35 crores in the case of a major Discom like JdVVNL. This negligible increase suggests a lack of seriousness and inadequate effort by the Petitioner in pursuing asset monetisation opportunities in a meaningful and strategic manner.

In this regard, we respectfully request the Commission to direct the Petitioner to submit a comprehensive report evaluating the monetization potential of its assets. The report should include detailed information on land, poles, and other relevant assets, the current income derived from these assets, and a strategic plan to enhance this income.

### 5.20. 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).

### 5.21. 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.

### 5.22. Compensation on SoP Violations

The Commission, in its orders dated 31.03.2023 (see Page 268 of the Order dated 31.03.2023) and 26.07.2024 (see Page 276 of the Order dated 26.05.2024), 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.

### 5.23. Treatment of Regulatory Surcharge

In Paragraph 8.15 of the petition, the petitioner has projected a revenue surplus of ₹1,244 crore for FY 2025–26 and ₹1,407 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 63 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 (up to 200 units) for consumers having sanctioned load up to 5 kW. While such rationalisation may appear administratively convenient, it would have a disproportionate and adverse impact on low-consumption NDS consumers, particularly those in the existing slab of consumption up to 100 units per month, who largely comprise marginal shop owners and small commercial establishments, especially upon 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 not more than two-thirds of the energy sales of NDS-2 consumers, as evident from Form 2.1 of the ARR formats filed by the Petitioner. This clearly indicates that the effective load of NDS-1 consumers is significantly lower than that of NDS-2 consumers (refer ANNEXURE – I). Despite this, under the proposed slab merger, NDS-1 consumers would be subjected to the same fixed and energy charges as NDS-2 consumers whenever tariffs are revised in future, thereby imposing an undue financial burden on low-consumption users (refer ANNEXURE – V).

In this context, it is respectfully submitted that the existing tariff slab for NDS consumers with monthly consumption up to 100 units should be retained. Removal of this slab under the proposed tariff structure is likely to result in a substantial increase in electricity bills for economically weaker shop owners and small commercial establishments, adversely affecting their viability. Protecting 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, 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. 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.

### 7.2. 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.

### 7.3. High Percentage of Defective Meters

The Petitioner has submitted that only 14,629 meters have been replaced during FY 2025–26 (till date), citing limited resources as the reason. This reflects a serious and persistent issue, as the Petitioner has neither disclosed accurate and complete circle-wise data on defective meters nor ensured their timely replacement, despite repeated directions of the Hon'ble Commission.

Such continued non-compliance adversely affects service reliability, consumer billing accuracy, and the Petitioner's own revenue realization, and undermines effective energy accounting and loss assessment. In view of the above, it is respectfully requested that the Hon'ble Commission may be pleased to:

- Impose appropriate penalties on the Petitioner for its consistent failure to comply with multiple directions of the Hon'ble Commission; and
- Direct the Petitioner to submit a short-term, time-bound investment and implementation plan for replacement of all defective meters, including circle-wise targets and timelines, to ensure full compliance and improvement in service standards.

### 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 ₹5 lakh towards employee skill development and training, which is substantially lower than the mandated allocation. 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. Monetization of Discom's Assets

In the Tariff Orders dated 26.07.2024 and 03.10.2025, the Hon'ble Commission had directed the Discoms to enhance their revenues through optimal utilisation of existing assets, with specific emphasis on revenue generation from electricity poles, including their use for advertisements and cable laying.

While the Petitioner has reported net revenue of ₹10.35 crore from such activities in FY 2024–25, which is an improvement over the previous year, the same remains significantly low considering the extensive operational area of the Petitioner. Further, the Petitioner has reported **nil revenue** from the Balotra and Jaisalmer circles, which appears implausible, particularly in view of Jaisalmer being a globally renowned tourist destination with substantial commercial and advertising potential.

In view of the above, it is respectfully requested that the Hon'ble Commission may be pleased to direct the Petitioner to submit affidavits from the respective in-charge officers of the O&M sub-division offices of Jaisalmer and Balotra circles, certifying and explaining the nil recovery of revenue from poles during FY 2024–25.

### 7.8. Reduction of Losses- Adoption of Circles by MD

There has been negligible improvement in distribution losses in the circles adopted by the Managing Director (MD), which is a matter of serious concern, particularly when direct oversight by top management has not translated into measurable on-ground outcomes. The distribution losses in Churu and Jodhpur City Circle exceed 20%, while losses in the Bikaner

district remain above 17%. Notably, none of these circles have achieved the Petitioner’s own target of 15% distribution losses for FY 2024–25.

In view of the above, it is respectfully requested that the Hon’ble Commission may be pleased to direct the Managing Director to submit a clear, time-bound, and executable roadmap for reduction of distribution losses, at least in the circles adopted by the MD. Further, the Commission may consider initiating strict action to fix accountability for persistent non-compliance and failure to achieve approved loss-reduction targets.

### 7.9. Format of the Petition

Despite repeated directions of the Hon’ble Commission to submit petitions and supporting data in machine-readable formats, the Petitioner has once again filed the documents in scanned (non-machine-readable) form. This amounts to continued non-compliance and disregard of the Commission’s explicit directives, and significantly hampers effective scrutiny, analysis, and stakeholder participation in the regulatory process.

## ANNEXURE – I

| Electricity Consumer Category  | Connected Load (L <sub>C</sub> ) | Energy Sold (E <sub>S</sub> ) | Load Factor (L <sub>F</sub> ) |
|--|----------------------------------|-------------------------------|-------------------------------|
| <b>Domestic</b>  |                                  | <b>5403</b>                   |                               |
| LT-Domestic (LT-1)   | <b>4584625</b>                   |                               |                               |
| BPL (upto 50 units/month)  | 114219                           | 444                           | 44.42%                        |
| Small Domestic (Consumption up to 50 units/month)  | 1532699                          | 772                           | 5.75%                         |
| General (upto first 50 units/month)  | 379795                           | 153                           | 4.60%                         |
| General (51-150 units/month)   | 1022204                          | 1055                          | 11.78%                        |
| General (150-300 units/month)  | 775899                           | 1188                          | 17.48%                        |
| General (301-500 units/month)  | 382875                           | 750                           | 22.38%                        |
| General ( above 500 units/month)   | 346649                           | 1007                          | 33.17%                        |
| <b>HT-Domestic (HT-1)</b>  |                                  |                               |                               |
| <b>For contract demand over 50 KVA (All units)</b>                                       | 30284                            | 33                            | 12.53%                        |
| <b>NON-DOMESTIC - LT</b>   |                                  |                               |                               |
| <b>(I.) Sanctioned connected load up to 5 K.W.</b>                                       |                                  |                               |                               |
| Consumption upto first 100 units per month   | 300828                           | 48                            | 1.82%                         |
| Consumption above 100 units and upto 200 unit per month                                  | 105009                           | 93                            | 10.12%                        |
| Consumption above 200 unit and upto 500 units per month                                  | 105939                           | 162                           | 17.44%                        |
| Consumption above 500 units per month  | 57873                            | 243                           | 47.85%                        |
| <b>(II.) Sanctioned connected load above 5 K.W.</b>                                      |                                  |                               |                               |
| Consumption upto first 100 units per month   | 115419                           | -0.18                         | -0.02%                        |
| Consumption above 100 units and upto 200 unit per month                                  | 46766                            | 9                             | 2.19%                         |
| Consumption above 200 unit and upto 500 units per month                                  | 102355                           | 40                            | 4.51%                         |
| Consumption above 500 units per month  | 411884                           | 735                           | 20.37%                        |
| <b>NON-DOM - HT</b>  |                                  |                               |                               |
| For contract demand over 50 KVA (All units)  | 367399                           | 322                           | 10.00%                        |
| <b>Public Street Light (LT-3)</b>  | <b>166620</b>                    | <b>83</b>                     | 5.67%                         |
| Population <1 Lakh   | 85974                            | 56                            | 7.45%                         |
| Population = >1 Lakh   | 80646                            | 27                            | 3.77%                         |
| <b>Agriculture (Metered) (LT-4)</b>  | <b>9208777</b>                   | <b>15682</b>                  | 19.44%                        |
| (i) General (getting supply in block hours)  | 8571644                          | 14307                         | 19.05%                        |
| (ii)All others not covered under items (i) and getting supply more than block hours      | 637133                           | 1375                          | 24.63%                        |
| <b>Agriculture (Flat) (LT-4)</b>   | <b>6760</b>                      | <b>657</b>                    | 1108.59%                      |
| (i)General (getting supply in block hours)   | 6748                             | 655                           | 1108.51%                      |
| (ii)All others not covered under items (i) above and getting more than block hour supply | 12                               | 1                             | 1153.65%                      |

## एकसप्ताह 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

रामनिवास सिंघर | हनुमानगढ़

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

100 यूनिट से बिजली खपत करने वाले उपभोक्ताओं के लिए 1.1 किलोवाट के सोलर पैनल लगाने की योजना उपभोक्ताओं को रास नहीं आ रही। नियमों की पेचोदगीयों के चलते लोगों 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 खपत वाले उपभोक्ताओं के 1.1 किलोवाट का निशुल्क सोलर पैनल लगाने के लिए योजना शुरू की थी। इसमें सहमति देने वाले उपभोक्ताओं को सोलर सिस्टम लगाना था। लेकिन वेंडर और उपभोक्ता अब यह सोलर सिस्टम लगाने में दिलचस्पी नहीं दिखा रहे। भास्कर ने इसकी वजह जानी तो सामने आया कि शुरू में बताया गया था कि योजना के तहत निशुल्क सोलर सिस्टम उपभोक्ताओं के घरों पर लगाए जाएंगे, 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 केंद्र 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 एकत्रित रकम खर्च करने में सक्षम नहीं होते। ऐसे जिन उपभोक्ताओं ने योजना की शुरुआत में बड़ी उम्मीदों से आवेदन किए थे, बाद में उन्हें पता लगा कि 70 हजार रुपए पहले खुद 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 निशुल्क बिजली का लाभ मिलेगा या नहीं। इस कारण उपभोक्ताओं ने सोलर सिस्टम लगवाने से हथ खींच लिए। कुछ दिनों के प्रयासों के बाद वेंडरों ने भी ऐसे उपभोक्ताओं के चक्कर काटना बंद कर दिया। वर्तमान में तो यह योजना उड़े बस्ते में ही है।

70 हजार रुपए के सोलर सिस्टम पर वेंडर को 5-7 हजार रुपए की बचत होती है। कगनी खानापूर्ति 3 व 5 किलोवाट के बख्तर होते हैं। तीन किलोवाट का सोलर लगाने पर वेंडर को 25-30 हजार रुपए बचते हैं। इस कारण वेंडरों ने रुचि नहीं दिखाई। कम उपभोग 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 केंद्र 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 वहन नहीं कर पा रहे। वे सब्सिडी मिलते ही वेंडरों को भुगतान करने का वादा करते हैं, जबकि वेंडर सोलर सिस्टम लगाने से पहले पूरा खर्च लेना चाह रहे हैं। सब्सिडी उपभोक्ता के खाते में ही आएगी। ऐसे में वेंडरों को यह डर रहता है कि बाद में उपभोक्ता रशि देने से मुकर सकता है।



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

अशोक गहलोत सरकार ने मुख्यमंत्री निशुल्क बिजली योजना का दायरा बढ़ाते हुए 2023 में परलु उपभोक्ताओं को 100 यूनिट बिजली देना शुरू किया था। इसमें जिले के कई धरोल 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 भजनलाल सरकार बंद करने का जोखिम भी नहीं लेना चाहती। इसलिए इस साल 19 फरवरी को पेश बजट में उन्होंने मुख्यमंत्री निशुल्क बिजली योजना से जुड़े उपभोक्ताओं को 150 यूनिट प्रतिमाह निशुल्क बिजली देने की घोषणा की। इसके तहत 100 यूनिट उपभोग वाले पहले से पंजीकृत उपभोक्ताओं के घरों में सोलर लगाए जाने हैं।

### भास्कर एकसपट

आरस चरण, एसई, हनुमानगढ़

राज्य सरकार की गहड़ लहान के अनुसार सोलर पैनल में लगाने वाले मीटर डिस्कॉम को देने होते हैं, जो उपलब्ध नहीं हैं। अगर उपभोक्ता खुद मीटर खरीदे, तो उनके लिए यह प्रोजेक्ट कामी महंगा हो जाता है। अगर

सोल्डर ये मीटर उपलब्ध करवा दे, तो उपभोक्ताओं को पैनल लगाना सस्ता हो सकता है। इस स्कीम 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

आरस चरण, एसई, हनुमानगढ़

सवाल- 1.1 किलोवाट का सोलर लगाने पर सब्सिडी उपभोक्ताओं के खाते में आएगी या वेंडर के? जवाब- सब्सिडी तो उपभोक्ताओं के खाते में ही आएगी। इसमें 33 हजार केंद्र व 17 हजार रुपए राज्य सरकार देगी। सवाल- सोलर पैनल लगाने के बाद 100 यूनिट फ्री बिजली योजना का लाभ उपभोक्ताओं को मिलेगा या नहीं? जवाब- इस संबंध में अभी तक सरकार व डिस्कॉम स्तर पर कोई

स्पष्ट गाइड लहान हमारे पास नहीं आई है।

सवाल- सोलर पैनल में यूज होने वाले मीटर भी डिस्कॉम उपलब्ध नहीं करवा रहा, 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।

### ANNEXURE – III

Deposited Demand Receipts in 2023 but Agricultural Connections Yet to Be Released as on 06.01.2026

|  |   |
|--|---|
| <p>VVNL Form No. A-9<br/> <b>JODHPUR VIDYUT VITRAN NIGAM LTD.</b><br/>                 Note: If payment is made by cheque this receipt will be considered as "Provisional" until Cheque is encashed.</p> <p>Book No. <b>5260</b><br/>                 Misc-Cash Receipt</p> <p>Name of office: <b>वापन</b></p> <p>Received from Shri: <b>डीपतिरि डी राजवति अशमन</b></p> <p>The sum of Rs. <b>53150/-</b> (in words) Rs. <b>पंचपचास हजार</b><br/> <b>एक सौ पचास रुपये मात्र</b> on account of <b>अ/कुल/प</b></p> <p>AO/X.En/A.En/ARO/Cashier</p>                                | <p>VVNL Form No. A-9<br/> <b>JODHPUR VIDYUT VITRAN NIGAM LTD.</b><br/>                 Note: If payment is made by cheque this receipt will be considered as "Provisional" until Cheque is encashed.</p> <p>Book No. <b>5798</b><br/>                 Misc-Cash Receipt</p> <p>Name of office: <b>वापन</b></p> <p>Received from Shri: <b>डीपतिरि डी राजवति अशमन</b></p> <p>The sum of Rs. <b>50650/-</b> (in words) Rs. <b>पचास हजार</b><br/> <b>सौ पचास रुपये मात्र</b> on account of <b>अ/कुल/प</b></p> <p>AO/X.En/A.En/ARO/Cashier</p>         |
| <p>VVNL Form No. A-9<br/> <b>JODHPUR VIDYUT VITRAN NIGAM LTD.</b><br/>                 Note: If payment is made by cheque this receipt will be considered as "Provisional" until Cheque is encashed.</p> <p>Book No. <b>5500</b><br/>                 Misc-Cash Receipt</p> <p>Name of office: <b>AEN (Rural) JSM</b></p> <p>Received from Shri: <b>Bhagwan Ram/Nangaram Jainrat</b></p> <p>The sum of Rs. <b>49150/-</b> (in words) Rs. <b>Forty Nine Thousand one Hundred</b><br/> <b>Fifty Rupees only</b> on account of <b>अ/कुल/प</b></p> <p>AO/X.En/A.En/ARO/Cashier</p> | <p>VVNL Form No. A-9/2019<br/> <b>JODHPUR VIDYUT VITRAN NIGAM LTD.</b><br/>                 Note: If payment is made by cheque this receipt will be considered as "provisional" until the cheque is encashed.</p> <p>Book No. <b>5370</b><br/>                 Misc. Cash Receipt</p> <p>Name of Office: <b>वापन</b></p> <p>Received from Shri: <b>लालू (ग) राजवति अशमन</b></p> <p>The Sum of Rs. <b>50650</b> (in words) Rs. <b>पचास हजार</b><br/> <b>सौ पचास रुपये मात्र</b> on account of <b>अ/कुल/प</b></p> <p>A.O./X.En/A.En/ARO/Cashier</p> |

## ANNEXURE – IV

Details of connections released to rural households and circle wise unelectrified hamlets in Jodhpur Discom

Annex-1

| S NO | Name of Scheme            | Total Nos. of Connection released |         |         |         |         | Total |
|------|---------------------------|-----------------------------------|---------|---------|---------|---------|-------|
|      |                           | 2020-21                           | 2021-22 | 2022-23 | 2023-24 | 2024-25 |       |
| 1    | DDUGJY (NEW Plan)         | 7130                              | 0       | 0       | 0       | 0       | 7130  |
| 2    | Saubahgya (grid)          | 10715                             | 0       | 0       | 0       | 0       | 10715 |
| 3    | Saubahgya (Off-grid)      | 10012                             | 0       | 0       | 0       | 0       | 10012 |
| 4    | Left out Rural House Hold | 0                                 | 0       | 0       | 0       | 625     | 625   |
|      | Total                     | 27857                             | 0       | 0       | 0       | 625     | 28482 |

11/01/2026  
SE(CSS)

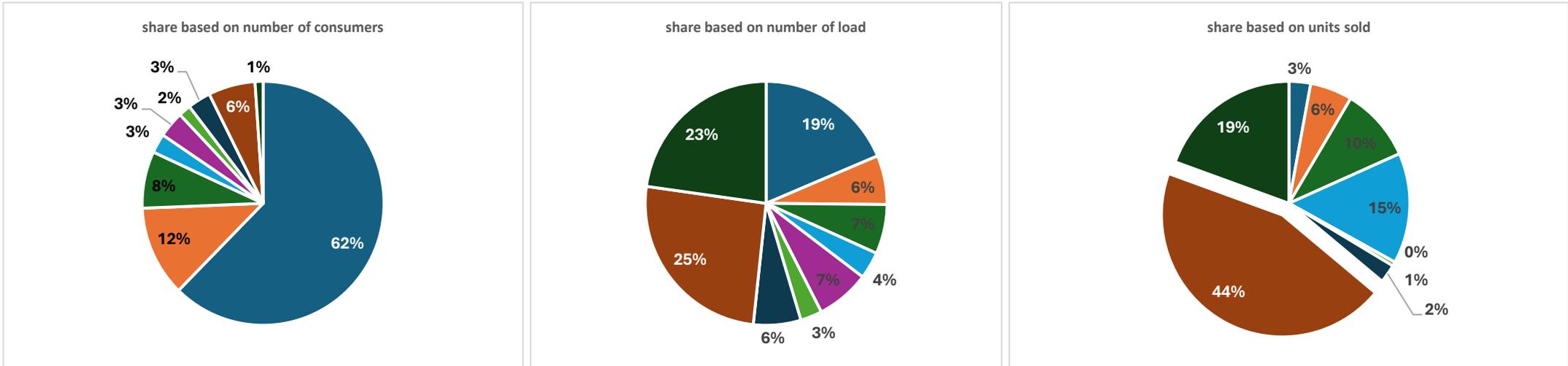
Circle Wise total number of unelectrified Hamlets

Annex-3

| S No | Name of Circle | Unelectrified Hamlets |
|------|----------------|-----------------------|
| 1    | Anoopgarh      |                       |
| 2    | Balotra        | 812                   |
| 3    | Barmer         | 18999                 |
| 4    | Bikaner        | 30468                 |
| 5    | Churu          | 13920                 |
| 6    | Hanumangarh    | 38594                 |
| 7    | Jaisalmer      | 11365                 |
| 8    | Jalore         | 21654                 |
| 9    | Jodhpur        | 3871                  |
| 10   | Pali           | 8109                  |
| 11   | Phalodi        | 690                   |
| 12   | Sanchore       | 5460                  |
| 13   | Sirohi         | 2543                  |
| 14   | Sriganganagar  | 5012                  |
|      | Grand Total    | 1308                  |
|      |                | 162805                |

## 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 JdVVNL