

# RAJASTHAN ELECTRICITY REGULATORY COMMISSION

**I.A. No. 01/2025**

**Petition No. RERC/2280/2024**

In the matter of approval of Investment Plan for Rajasthan Rajya Vidyut Prasaran Nigam Limited & SLDC for the FY 2025-26.

**Coram** : **Dr. Rajesh Sharma, Chairman**  
**Hemant Kumar Jain, Member**

**Petitioner** : Rajasthan Rajya Vidyut Prasaran Nigam Ltd.

**Respondents** :

- 1) Jaipur Vidyut Vitran Nigam Ltd.
- 2) Ajmer Vidyut Vitran Nigam Ltd.
- 3) Jodhpur Vidyut Vitran Nigam Ltd.
- 4) Rajasthan Rajya Vidyut Utpadan Nigam Ltd.
- 5) Rajasthan Urja Vikas Nigam & IT services Ltd.

**Date of hearing** : 08.04.2025

**Present** :

- 1) Sh. Rahul Lodha, Advocate for the Petitioner.
- 2) Sh. Ishan Kumawat, Advocate for Respondents.
- 3) Sh. G L Sharma, Stakeholder.
- 4) Sh. Piyush Shrivastava Representative for M/s Resonia

**Date of Order** : **26.05.2025.**

## ORDER

- 1.1 Rajasthan Rajya Vidyut Prasaran Nigam Ltd. (in short "RVPN"), a Transmission Licensee under Regulation 4 of the RERC (Investment Approval) Regulations, 2006, has filed a petition on 20.12.2024 for approval of the Investment Plan for FY 2025-26. Further, RVPN revised their investment plan from Rs. 5700 Crore to Rs. 6050 Crore vide an interlocutory application submitted on 10.03.2025.
- 1.2 As required under Section 64(2) of the Electricity Act, 2003, public notices with salient features of the petition inviting objections/ comments/ suggestions were published in the following newspapers on the dates mentioned:

**Table 1:Details of Newspapers**

<b>Sr.No.</b>	<b>Name of News Paper</b>	<b>Date of publishing</b>
(i)	Times of India Jaipur edition	22.01.2025
(ii)	Dainik Bhaskar	22.01.2025
(iii)	Rajasthan Patrika	22.01.2025

- 1.3 The petition was also placed on the websites of the Commission and the Petitioner. The objections/comments/suggestions were received from Sh. G.L. Sharma, Sh. Shanti Prasad & M/s Resonia limited. Respondent Rajasthan Rajya Vidyut Utpadan Nigam Ltd. did not file its comments/suggestions.
- 1.4 The Commission forwarded the objections/comments/suggestions of the stakeholders to RVPN for filing its reply.
- 1.5 The Commission vide letter dated 08.01.2025 communicated some data gaps and deficiencies in the petition. The Petitioner furnished information vide its letter dated 10.02.2025.

- 1.6 Respondent Rajasthan Urja Vikas & IT Services Limited (RUVITL) submitted its reply in respect of the petition on 25.02.2025. The Petitioner also filed rejoinder vide its letter dated 04.03.2025 on reply of Respondent Rajasthan Urja Vikas Nigam & IT services Ltd. and the stakeholders.
- 1.7 Petitioner vide its letter dated 10.03.2025 has also filed an interlocutory application for additional investment of Rs. 359 crore for the schemes declared in state government budget announcement and other Scheme as per system requirement in FY 2025-26.
- 1.8 Petitioner also filed Additional submission on 19.03.2025 in the instant petition in the matter of approval of Investment Plan of RVPN for the FY 2025-26.
- 1.9 Sh. Shanti Prasad and Sh. G.L. Sharma have filed objections/comments in IA no. 01/2025. RVPN vide its letters dated 26.03.2025 and 04.04.2025 submitted its reply/rejoinder on objections/comments of Sh. Shanti Prasad and Sh. G.L. Sharma respectively.
- 1.10 The Commission heard the matter on 08.04.2025. The Commission reserved the order and directed the petitioner to furnish their response on certain points and furnish their submission. In compliance to above order, Petitioner filed their reply and additional submissions on dated 28.04.2025, 02.05.2025 and 22.05.2025 respectively.
- 1.11 In exercise of the powers conferred under Sections 64 and other provisions of Electricity Act 2003, read with RERC (Investment Approval) Regulations, 2006 and other enabling Regulations, the Commission, after carefully considering each of the submissions of the Petitioner and suggestions/objections submitted by the Stakeholders, has passed the following Order.

1.12 This order has been structured in following sections:

- (1) Section 1: General
- (2) Section 2: Summary of objections/comments/suggestions received from stakeholders and RVPN"s response thereon
- (3) Section 3: Analysis of Investment Plan for FY 2025-26.

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## **SECTION 2: Summary of objections/comments/suggestions received form stakeholders and RVPN's response thereon**

### **Comments on Investment Plan Petition of Transmission and SLDC for FY 2025-26**

#### **Stakeholder's Comment/Suggestions**

2.1 The Stakeholder submitted that Petitioner has given the details of various sources of funds for executing the Investment Plan of FY 2025-26. Petitioner with this petition has not provided any document in support of above sources even the copy of any consent given by each of above agencies to provide the required support has not been provided by the petitioner. Stakeholder sought the above information.

2.2 The Stakeholder submitted that RVPN may intimate the amount as has been actually received by them during FY 2024-25 with date of receipt thereof received from each of sources separately.

2.3 Stakeholder sought the following information regarding Form 4:

a) In Col. "up to previous year i.e. upto 31.3.2024 under col Equity, Debt, Grant/Subsidy/user's contribution and Total against sources of funding in respect of each works, no amount in respect of each source has been mentioned and only a total amount of Rs.1320983.83 lacs has been shown. Petitioner may provide necessary details of these amounts in respect of each works mentioned under Column.

b) In the aforesaid form i.e. Form 14 at Sr. No.12 for procurement of relays a total amount of Rs.1200 lac has been shown under FY 2025-26. It may be

mentioned that Relays independently cannot be considered as Investment. Specific purpose and specific name of GSS/Places where these are required to be installed with their proper justification needs to be provided by the petitioner. Stakeholder sought information regarding the same.

c) Further again in this Form 4 in FY 2025-26 a total amount of Rs.283063 lac has been shown in respect of loss reduction schemes/ works/system improvement and stability. Petitioner may provide details of this amount as below:-

- i. S.No. of schemes in Form-2 pertaining to loss reduction scheme/works and total amount of these works.
- ii. S.No. of schemes in Form-2 pertaining to works for improvement in system and their total amount.
- iii. S.No. of schemes in Form-2 pertaining to system stability and total amount of such schemes.
- iv. S.No. of schemes in Form-2 pertaining to system reliability and their total amount of these schemes.

d) Stakeholder sought brief note in each case as follows:

- i) For system Improvement schemes  
What is the present position of existing system and in what ways there will be improvement in the present system and after improvement what benefits will be achieved with the proposed investment.
- ii) Similarly in respect of stability of the existing system the present condition of the system and after proposed investment what will be the stability of the system be also stated.
- iii) In respect of reliability schemes it may be stated as to in what way the existing system is lacking in reliability and after proposed investment how the system will become fully reliable.

- 2.4 Stakeholder sought information in respect of each augmentation that petitioner may provide as to what is the present capacity installed at each place, how much load has achieved on the existing system and what is the expected load with source thereof on the present system and what will be proposed augmentation. It may also be stated as to whether the augmentation will be by installing additional capacity or by replacing the existing capacity with higher capacity. Stakeholder sought clarification that how the removed capacity will be utilized.
- 2.5 Further, Stakeholder sought details of carried over liabilities, scheme wise. Stakeholder sought information that when such schemes have been put to use.
- 2.6 Stakeholder also sought copy of documents providing grant in respect of Old schemes and New Schemes by the concerned authority.
- 2.7 The Stakeholder submitted that in respect of scheme 400kV GSS at Hanumangarh in Form2 new location has been mentioned as village Pakka Sarnan whereas in sanction order of the Commission dated 29.11.2024, it is Hanuman (Kenchiya). Even in the 7<sup>th</sup> meeting of State Committee on Transmission, this schemes has been mentioned as “400 KV GSS Hanumangarh (Kenchiya)’. Hence it needs clarification from RVPN as to how the location of this schemes has been changed from Kenchiya to village Pakka Sarnam .
- 2.8 RVPN has submitted Interlocutory application (IA) for approval of additional investment of Rs.350 crs. (Rs.359crs -Rs.9 crs) for FY 2025-26 to be considered with the petition of investment plan of Rs. 5700 crs under considerations of RERC. This IA substantially changes the original petition and should be

treated as revised petition and should follow the same process as that of original petition. Forwarding it to few, does not meet the requirement of inviting public comment.

2.9 The Stakeholder submitted that in the IA, it has also brought out essentiality and urgency of the following schemes in detail:

- (i) Jaisalmer- Jodhpur ( Kankani )- Phagi 765 kV corridor.
- (ii) Bikaner (new) – Bhadla (new) 400 kV s/s upgradable to 765 kV
- (iii) 400 kV Kumher substation
- (iv) 400 kV Amber (Jaipur-II) substation

It is observed that except for sr.no.(iv), no provision for other schemes have been made in the details of additional investment in form 2A. These three schemes as per annexure 2 and 3 have been proposed recently on 6th and 7th March 25 for execution under Green Energy Corridor-III under Regulated Tariff Mechanism (RTM). As per IA, it appears that centre Govt. Grant and kFW soft loan will meet entire funding requirement which does not appear to be feasible as under GEC-II schemes.

Further, IA does not indicate dates of approvals of centre Govt.'s grant and soft loan in lakhs of Rs. and their terms, specially funding requirement of RVPN/ State Govt. for equity. Further no details of GEC-III is given on MoP's web site Their immediate execution is thus uncertain and it will be more uncertain if equity requirement is specified and there is no provision for it in annual plan.

2.10 The Stakeholder submitted that in view of urgency for their execution, it would be appropriate if some provision for these schemes (costing Rs. 10025 crs.) is made for taking up preliminary works of land selection, land



acquisition, line route survey, management fee and commitment charges of kFW, etc. to be later adjusted in equity/ debt. RVPN should have, therefore, made and should now make provisions for these under clause A(9) and (E)(2) (b)(5) of Annexure -1 of RERC investment plan regulations 2006.

2.11 The Stakeholder submitted that IA is stated to be based on transmission schemes announced in budget of the state Govt. for FY 2025-26. Para 12 of budget speech dated 19.02.25 states for taking up of works of 1 no. 765 kV, 5 nos. 220 kV and 13 nos. of 132 kV substations during the year. It was observed that out of the some of the substations listed therein, form 2A of IA does not have provisions for 765 kV substation at Nagaur, 400 kV substations at Dechu. Banswara, Dehara(kota) and Swaimadhopur, 220 kV substations at Pokhran, Hemda, Lamba Jatan and 5nos. 132 kV substations. RVPN should ,therefore, make for all these new schemes (taken together) the provisions in investment plan for these works under clauses mentioned above.

2.12 The Stakeholder submitted that as per Reg. 3 (1) of Investment Approval Regulations, 2006 the schemes should indicate yearwise phasing of works to be done under each scheme and phasing of expenditure thereof. No such information has been made available by the petitioner. This may now be provided.

2.13 The Stakeholder submitted that regarding the details of schemes which are stated to have been removed and now included in this IA application, estimated original / revised cost of the project has been stated on appropriate basis whereas in the TSPCC meeting the cost of these schemes are on much higher side.

2.14The Stakeholder submitted that the scheme as at Sr. No. 4 for 220kV Manda and 220kV Batina have not been approved by TSPCC. How there have been included in the present application IA.

2.15The Stakeholder submitted that schemes which have not been approved by the Technical Committee and included in the present IA application should be disallowed by the Commission.

2.16The Stakeholder submitted that the petitioner before including schemes more than Rs 250 crore in the Investment Plan, should have obtained the approval of the State Govt. No such approval has been provided by the Petitioners. Stakeholder sought copy of the same. In absence of such approval, Stakeholder requested Commission to disallow the proposals of these schemes. Further, from the records submitted by the petitioner it is noted that no revaluation has been made by the petitions before placing the matter before SCT.

2.17The Stakeholder submitted that State Governments does not have the jurisdiction to issue any policy directions in the matter of Tariff. Of course, the State Govt. has a right to be consulted during preparation of the Tariff Policy by the Central Government.

2.18The Stakeholder submitted that from the perusal of the minutes of SCT, no such requirements have been made nor any cost benefit analysis have been placed.

2.19The Stakeholder submitted that Rs. 80 cr. has been proposed for 400 KV D/C Suratgarh TPS - Babai Line and that the said project was conceptualized in

FY 2011-12 and commissioning got delayed due to pending litigations. In Sep-2023, all pending cases had been disposed off and the work/s have been awarded to a new contractor. Thus, the Commission may direct the petitioner to furnish details pertaining to financial liabilities incurred due to delay of about 12 years. Further, on account of such delay and financial loss, any additional cost may not be passed on to the Discoms as it is entirely in the scope of Contractor/Petitioner.

2.20 The Stakeholder submitted that the cost of 400kV D/C Suratgarh TPS-Babai (Jhunjhunu) line has been more than 2.5 times of 2010 at present. Such high burden has been imposed on ultimate consumers for no fault of their. Stakeholder sought confirmation from the petitioner that this line will be completed and commissioned in FY 2024-25. Petitioner has never provided correct position about completion of this line.

2.21 The Stakeholder submitted that nowhere it has been stated as to what has been scheduled completion date in the order dated 8.4.2022 and why the same could not be complied fully and now says a new order dated 15.6.2024 has been placed but with whom and which is the scheduled completion date as per this order not being indicated by the petitioner. Stakeholder sought copy of order dated 15.06.2024.

2.22 The Stakeholder submitted that when petitioner has been fully aware for this line could not be completed in time then for what seems the SE (P&P) of RVPNL who has been Member Secy. of Tech. Committee has been providing wrong information to the Tech. Committee as below:-

- In the meeting of 175 of Technical Committee the said SE had informed that order has been placed with M/s. Keycee Infra on dated 8.4.2022 and work was scheduled to be completed in next months.

- Again said SE RVPN informed the Tech. Committee on 17.6.2022 that work would be completed upto Nov.2022.
- Further again in the meeting of 10.3.2023 the said SE intimate that Revised target for commissioning of this line was 6 months i.e. Sept.,2023.
- What have been the reasons for providing such misleading information from time to time and even now, no definite date is being stated by the petitioner and on the other side cost of this line is being revised.

2.23The Stakeholder requested Commission to very kindly restrict the enhancement of cost, sought the petitioner to complete the work in a definite period/ tenure so that the benefits to be accord could be available to the beneficiaries and no other cost is born by them.

2.24The Stakeholder sought the information of total length of this line and how much work has been completed so far and how much yet to be completed has also not been mentioned. Stakeholder sought complete information about this line.

2.25Stakeholder sought copy of the equity commitment of GoR with proper documents.

2.26Stakeholder sought the information in respect of total expenditure upto Jan., 2025 scheme wise under Investment Plan for FY 2025-26.

2.27The Stakeholder submitted that in Form-2 Provision (Revised) for FY 2024-25 in respect of ongoing scheme has been made by the petitioner as Rs. 2293.11 Cr as against 1288.86 as proposed by them and approved by the commission. Similarly in respect of New schemes also petitions has proposed Rs. 80.00 Cr only in the present petition as against Rs.1162.95 Cr approved by

the Commission in the said order. Stakeholder sought reasons for such variation from the petitioner.

2.28 The Stakeholder submitted that in respect of Suratgarh-Babai line it may also be added here that petitioner has not provided correct position. When 98% work has been stated to have been completed in Dec., 2019 then for what reasons the 2% work could not be completed so far. Petitioner has to provide proper detailed reasons for such abnormal delay and for increase in cost. Stakeholder sought copy of order of NCLT order dated 16.3.2023 vacating their stay order.

2.29 The Stakeholder submitted that as per Commission order dated 26.5.2017 actual Intra State Transmission loss were 3.89% in FY 2015-16 whereas as per True up petition of the petitioner actual loss have been shown as 4.33% for FY 2023-24, i.e. increased by 0.44%. During the period 2015-16 to 2023-24 petitioner has capitalization of Rs.11232.41 Cr. and inspite of such Capital works the Transmission losses have been shown on higher side and in all years petitions, petitioner have been stating investment for system improvement/loss reduction etc. Petitioner may provide justification in detail for such increase in transmission losses inspite of such investment.

2.30 The Stakeholder submitted that Commission in their order dated 26.7.2024 had observed that in the Investment plan order for 2023-24, RVPN was also directed to provide the details of transformers which will be replaced and where the replaced transformer will be utilized. However RVPN has not made compliance of the same.

2.31 The Stakeholder submitted that at S. No. 5 Transformer addition of 500 MVA each at 400 KV GSS Bhadla and at 400 KV GSS Ramgarh has been shown.

No justification for such additions has been provided. However, petitioners may provide the following in this respect:

- The number of transformers with capacity of each of such transformers existing at present at 400 KV GSS Bhadla as well as at 400 KV GSS Ramgarh, be intimated by the petitioners
- The present load on each of these GSS may also be intimated by the petitioners.
- Reference of investment plan for above addition approved by the Commission may also be intimated.

2.32 The Stakeholder submitted that again at S. No. 4 under network expansion and strengthening 3x500 MVA transformers with 3 Nos. Transformer bay and 4 No. line bays has been shown. The question is that when 765 KV GSS Jaisalmer has not yet been approved by the Commission, the 2 Nos. bays for D/C line from 765 KV Jaisalmer will remain lying unused for such a long time and therefore what is the justification for carrying out such work in anticipation of such work which too will also take a long time to complete. Stakeholder sought clarification in this regard

2.33 The Stakeholder submitted that all the lines, GSS etc. have been shown as commissioned between 8.7.2023 to 8.10.2024 ie. within financial year 2023-24 & 2024-25 and still in FY 2025-26 certain amount has been shown as provision of the work. Details of each work pending in respect of each line etc. be provided by the petitioners. It may also be stated that when provision for carried over liabilities has been shown then what is the purpose here for having any provision for such works which has been closed schemes.

2.34 The Stakeholder submitted that similarly schemes at S. No.2 to 5, Sr. No. 6 to 9 , S. No. 12 & 13 S.No.36 to 41, S.No. 43, 44,46 ,47,48(iii), S.No. 49(ii),(iii),S.No.50(ii), S.No.62,63, S.No. 69and72, S.No.75, all above works

schemes have been commissioned. Stakeholder sought details of pending works with cost of these schemes.

2.35The Stakeholder submitted that 132 KV D/C line from 220 KV Chokharwara to 132 KV Bhusawar has been stated to start the work in FY 2017-18. The justification of this line has been stated as "To meet increased load demand in Bhusawar, Bayana & weir area". This work has not yet been completed, reasons for delay and present position of this work may be stated by the petitioner.

2.36The Stakeholder submitted that besides above , it may also be stated by the petitioner whether during the period 2017-18 to 2024-25 there has been no increase in load demand in Bhusawar, Bayana and in case there has been then to what extent in each above area and how the same has been meet out. The stakeholder sought detailed note in this respect.

2.37The Stakeholder submitted that 132KV feeder bays at Hamirgarh and Suwawa were commissioned on 17.5.2022 and 1.6.2022 whereas the 132 KV Hamirgarh - Suwawa line has been commissioned on 10.1.2024 ie. after a period of above 2 years. Thus the above bays remained unused and petitioner claimed the O&M expenses of these bays during those related financial year. These expenses may now be removed from the petitioner claim.

2.38The Stakeholder submitted that similarly 132 KV feeder bay (No. not provided by the Petitioners. this may now be provided by the petitioners) have been completed on 23.5.2022 whereas the 132KV S/C Kachola-Jahajpur line is yet to be commissioned. Thus these bays have remain idle ie. Without use such expenditure has been also idle and petitions must have

claimed O&M expenses / depreciation of such idle bays for FY 2022-23 to date. The same now be recovered from the petitioners.

2.39 The Stakeholder submitted that similar position is there in respect of 132 bays at Jahajpur and Shahpura which have been commissioned whereas the 132KV line Shahpura- Jahajpur is yet to be completed.

2.40 The Stakeholder submitted that in respect of list of Grid substations Commissioned during last 4 years (from 2021-22 to FY 2024-25 ( Upto Nov.2024) the following is stated:-

- List of Replacement / Re-commissioned transformers has been provided. Reasons for replacement / re-commissioned have not been provided by the petitioners. These may now be provided for each case.
- Under head "Augmentation" from this list it is noted generally that lower capacity of transformers has been taken over and high capacity has been replaced as Augmentation but against none of this station the present load as achieved prior to replacement with high capacity has been stated and what has been the present load as each station. This information may now be provided by the petitioner.
- Petitioners may also state what have been the reasons for replacement whether these have been due to existing transformers burnt or the present transformers become defective necessary information may now be provided by the petitioner.
- Further it may also be stated when a lower capacity of transformer has been removed what have been reasons/ justification for replacing the same with high capacity.



- It may be pursued at 220 KV GSS Bhiwadi 160 MVA transformer installed on 04.09.2023 has been taken out and in its place 100 MVA transformer has been replaced for such lower capacity be provided by the petitioners.

2.41 The Stakeholder submitted that under Jaipur Zone a transformer at Champapura of 20/25 MVA was removed and transformer of 40/50 MVA was commissioned on 13.7.2024. Further, again at same Champapura a transformer of 20/25 MVA was removed and transformer of 31.5 MVA capacity was commissioned on 06.09.2024 i.e. within a periods of 2 months. In this respect petitioner may provide the information as to how many transformers of each of capacity were existing at Champapura as on 1.7.2024 and what has been the total load at this station on this station. What has been reasons for providing two difference transformer of capacity of 40/50 MVA and 31.5 MVA capacity on 13.7.2024 and on 6.9.2024. Stakeholder sought detailed reasons from the petitioner.

2.42 The Stakeholder submitted that under Jaipur Zone, transformer of 10/12.5 MVA has been stated as removed and transformer of 20/25 MVA has been stated as replaced and commissioned on 10.7.2024. This has been shows under Augmentation at Bakani but under replacement/ re-commission of transformer similar / same position at Bakani has been stated i.e. transformer of 10/12.5 MVA taken out and transformer of 20/25 MVA commission on 10.7.2024 i.e. one and same position i.e. the same transformer commissioned on same date and taken out on the same date has been shown under augmentation and replacement i.e. at same places. reasons for such duplicacy may be provided by the petitions

2.43 The Stakeholder submitted that Petitions vide annexure 5 has stated that they have submitted DPR to the RERC. From the documents as provided it is not clear whether the DPR in question are duly approved by board of directors before coming to the Commission for approval of investment. The Stakeholder further, submitted that Commission in their order 26.7.2023 had directed to RVPN for the above. Petitioners may, therefor, provide necessary documents where under the DPRs in question have been approved by the BOD of RVPN.

2.44 Stakeholder sought copy of data Gap reply submitted by them to the Commissions and also as and when such documents are provided to the Commission copy of the same may also be provided to this applicant.

2.45 The Stakeholder submitted that RVPN has proposed investment plan of Rs. 5700 crs for FY 2025-26. Out of this, provision of Rs. 45 crs is towards SLDC works. It is submitted that as per sec. 32(1) of the Electricity Act 2003, SLDC is the apex body and is a separate entity than STU and even though it is managed by STU/RVPN, they are to be considered independent in respect of all matters and should file separate petition for investment like ARR, true up and tariff. Therefore, RVPN's investment plan is to exclude their investment and RVPN's investment be considered as of Rs.5655 crs. only.

2.46 The Stakeholder submitted that the Commission may kindly consider issuing direction that all schemes approved before say 2 years of submission of petition need necessarily be submitted with revised costs duly approved by TSPCC.

2.47 The Stakeholder submitted that Form 6 of the petition gives details of transmission schemes already take up / to be taken up through private

sector participation/TBCB mode during FY2025-26. It is stated that except for its first 2 schemes which are under implementation, other schemes are listed under development stage with remark that "Mode of implementation is yet to be decided. RVPN should submit petition with revised form 6 with likely estimated cost and FY of commissioning and the Commission may give its observations thereon after obtaining stakeholders' comments. The Commission may kindly consider issuing appropriate directions in this matter.

2.48The Stakeholder submitted that it does not appear that DPRs of all schemes have been placed before TSPCC and TSPCC has gone through each of them. Further, not bringing out the results of load flow studies in minutes of TSPCC or petition of investment plan, goes against the spirit of public participation and transparency envisaged in the Electricity Act 2003. The Commission may kindly direct RVPN to place results of load flow studies before TSPCC and include it in the petition and place detailed studies on web site and to have TSPCC before submission of schemes for approval to BoD / WTD.

2.49The Stakeholder submitted that RVPN vide sr.no. 5 of above reply stated that "PSDF has rejected STATCOM for funding. Therefore scheme shall now be executed on TBCB mode or...RTM mode without PSDF funding (&) from state funding shall be decided.....This scheme will now be posed to the SCT for suitable consideration on mode of execution". This scheme does not find place in investment plan for FY25-26 even for execution under TBCB mode. It is not clear whether grid conditions have improved and scheme has been considered as not necessary and dropped or scheme has been replaced by another scheme of reactors and capacitors or RVPN has lost interest in the scheme in absence of PSDF funding (to the extent of 90%) even though required from system conditions. Stakeholder sought elaboration. It would

be appropriate if any scheme included in previous financial year ( with any mode of funding) is dropped or substantially modified it should be brought out in petition. RVPN may indicate all such schemes for FY25-26.

2.50 The Stakeholder submitted that no cost-benefit ratio is indicated against any scheme and instead for some schemes NPV after 5 years and 10 years have been indicated. The NPV of schemes should be indicated as % of estimated capital cost so that various schemes may be compared on common footings. For some schemes for example sr.no. 3,4,5,6 and 7, 36 to 40, NPV is -ve indicating those to be non-remunerative. RVPN has stated that negative NPV is for loss reduction schemes. This is not understood as above clause provides that "for transmission schemes marginal cost of the power saved due to reduction in losses shall be considered. For this purpose, highest cost of purchase of power from Thermal Generating Stations .. would be considered". RVPN may elaborate whether this has been considered and yet there was -ve NPV, if so considerations of taking such non remunerative schemes. RVPN may also supply one such calculation.

2.51 The Stakeholder submitted that as per CEA's Report on resource adequacy analysis plan for Rajasthan (feb. 25), its capacity addition requirement will be 1118.6 , 2166.7 and 2203.00 MW respectively during FY 2025-26, FY 2026-27 and FY 2027-28 i.e., total 5488 MW. However, it is observed that petition does not indicate any new transmission system for evacuation of RE power. The installed capacity of solar projects in Rajasthan in Nov.,24 ,as per CEA report on installed capacity, is 33780 MW. Thus solar generation in Rajasthan has crossed the capacity for which it was designed. Transmission system, said to be considered in TBCB mode, has not listed any scheme for evacuation of power from Jaisalmer-Bhadla – Bikaner region. CTU/Power Grid's system might be evacuating this generation but since Power grid and

RVPN's system is interconnected so it will affect some part of RVPN's transmission system. Thus load flow studies are required to assess long term requirement of transmission system and based on it schemes are to be included in Annual investment plan whether executed by RVPN's resources or through TBCB mode. RVPN may supply these details and inclusion of requisite transmission system in their annual plans.

2.52The Stakeholder submitted that there has been heavy slippages in actual investment vis-à-vis approved investment plan. It would be appropriate that under 'new schemes', schemes for which there is no such bottlenecks envisaged should be priorities and listed separately and out of all other schemes, similar schemes may be grouped together with envisaged capital outlay with ceiling much less than the aggregate, so that the schemes having received all such clearances and fundings may be prioritized and executed with transfer of allocations for other schemes without prior approval of the Commission but not exceeding overall ceiling limit.

2.53The Stakeholder submitted that the actual expenditure incurred is only Rs.1,288.45 Cr. Apart from these works, Petitioner has also taken up various deposit woks of Rs. 402.34 Cr. The petitioner has further submitted the physical targets for FY-2024-25 and the achievements as of November, 2024, and from a perusal of the same, the petitioner is far from completing various works and hence the Commission may direct the petitioner to expedite the works, so that the said works may not be shifted to the subsequent years and that no additional cost may be incurred for the same works again.

2.54The Stakeholder submitted that Rs.16.90 cr. has again been proposed to avoid overloading at Kalisindh TPS, however, it may be considered that for the same expenses, the petitioner had claimed Rs. 21.20 cr. in the

investment plan for FY 2024-25 and that the petitioner in the captioned petition has submitted that up to FY 2023-24 the tentative expenditure was Rs.1.35 cr. which is 3% of the original project cost.

2.55The Stakeholder submitted that the petitioner has shown no progress with respect to Transmission System associated with 400 kV GSS at Sangod, as zero progress with respect to last year's submission, and that the petitioner has submitted similar proposed investment for FY 2025-26 as it had been submitted for FY 2024-25. Hence, the Commission may undertake detailed due diligence for these expenses and any expenses of O&M may not be considered.

2.56The Stakeholder submitted that the petitioner in the captioned petition has submitted that the investment proposal for financial year 2025-26, most of which are same as that of FY 2024-25. Further, for majority of the projects the petitioner has not furnished the details of physical targets and expenditure up to the last financial year, in the absence of which it would be difficult to assess the progress of the project/s which may lead to time and cost overrun. Therefore, the Commission may be pleased to direct the petitioner to furnish the year-wise spill of the projects with regards to time and money.

2.57The Stakeholder submitted that with regards to installation of Shunt Capacitor Bank at various 132 KV GSS, the petitioner has submitted that according to the 22nd meeting of the PSDF intimation, a decision has been made to withhold sanction of new projects and projects already under examination for a period of one year due to constraints posed by limited fund availability and pre-existing liabilities of PSDF. RVPN has approved a modification in the execution method of the aforementioned scheme/s to be carried out on a departmentally funded basis. Hence, Stakeholder

requested the Commission to direct the petitioner to expedite the works pertaining to installation of Shunt Capacitor Bank, so that quality power may be dispatched.

2.58 The Stakeholder submitted that for new schemes for FY 2024-25 costing above Rs. 250/- Cr., the petitioner has been granted approval by the Commission for RTM mode instead of TBCB mode, pertaining to which the Commission may form a committee or may directly overlook all the projects falling within this criteria, so that time and cost overrun may be avoided otherwise the purpose of granting such leave of commissioning the project early will serve no purpose.

2.59 The Stakeholder submitted that according to point 1.3 of Annexure-2 (Design Criteria and Selection of The Transmission and Distribution Schemes) - of RERC (Investment Approval) Regulations, 2006, there are set criteria for selection of scheme, however, the petitioner has undertaken schemes which are not in line with the design criteria as mentioned in point no.1.3 of Annexure-2. Stakeholder requested the Commission to allow only those schemes which are necessary for maintaining grid discipline after prudence check.

2.60 The Stakeholder submitted that the petitioner has claimed Rs.1.5 cr. under the Head of 'Carried over liability' however, the petitioner has not furnished the details of the same. In this regard, it is submitted that the Commission may carry out detailed prudence check before allowing the same.

2.61 The Stakeholder submitted that Rs. 271/- cr. projects have been proposed for 400 KV (NEW) upgradable to 765 KV at Bikaner and 400 KV (NEW) upgradable to 765 KV at Bhadala. Regarding the said projects, it is

submitted that, these works are proposed for evacuation of power from RE project developers and the Commission may direct the petitioner to ensure completion of the GSS works in synchronism with the RE project commissioning, so that project commissioning may not be delayed.

2.62The Stakeholder submitted that the petitioner has proposed various schemes/works for the FY 2025-26 which have already been proposed by the petitioner in the previous years, as these schemes will increase the time/cost overrun along with the tariff hence, the Commission may not allow such schemes which have not progressed as their burden will fall onto the beneficiaries and the consumers.

2.63The Stakeholder submitted that the Commission may allow schemes more than 250 crore only after prudence check and the recommendation of the State Committee for Transmission (in short 'SCT') and approval of the GOR as well.

2.64The Stakeholder submitted that the petitioner in the last 5 years has incurred approximately 60% actual expenditure towards the approved investment by the Commission, however, due to its lethargic approach various transmission works are yet to be completed and the petitioner now by way of filing the captioned petition for FY 2025-26 has doubled the investment plan from the previous year's investment plan. Hence, the Commission may consider the captioned petition only after prudence check

2.65The Stakeholder submitted that in RERC (Terms and Conditions for Determination of Tariff) Regulations, 2025, the Commission has revised threshold limit from Rs. 250 crore to Rs. 300 crore. Accordingly, in the above-mentioned Schemes, schemes at Serial No. 2 and 4 falls under the ambit of



TBCB in accordance with RERC Tariff Regulations, 2025. The Stakeholder requested the Commission to direct RVPN to immediately take proper steps to expedite the process of awarding all these projects through TBCB Route.

2.66 The Stakeholder submitted that Commission may direct RVPN to merge the projects with shared objectives based on factors such as upstream and downstream connections, similar nature or size, or geographic proximity and then award such projects through TBCB route. By clubbing transmission projects with these strategic factors in mind, the system's performance can be enhanced, fostering a more resilient, cost-effective, and sustainable energy network for the State.

2.67 The Stakeholder submitted that there is an urgent need to reduce the overall Intra State Transmission Charges of the State of Rajasthan and execution of Intra State Projects through TBCB will help in achieving the same.

### **RVPN's Response**

2.68 RVPN submitted that total investment plan size is Rs. 5700 Cr which also includes the Rs. 45 Cr for SLDC functions. A separate petition Annual Revenue requirement (not investment petition), shall be filed with the Commission .Therefore, SLDC included in investment petition FY 2025-26.

2.69 RVPN submitted that in the FY 2025-26 Budget, the Government of Rajasthan (GoR) announced additional schemes for the power sector. Further, in response to local needs and system strengthening, additional schemes have been identified for approval in FY 2025-26. These schemes are critical for meeting the increasing load requirements, improving transmission system strength, enhancing voltage regulation, and reducing transmission losses.

2.70 RVPN submitted that this IA is a part of the original investment plan petition for FY 2025-26. Both the petition and the IA have been uploaded on the RVPN website.

2.71 RVPN submitted that the scheme cost was taken tentatively in main investment petition FY 2025-26 after issue of A&Fs and DPR, the scheme has been included in IA for FY 2025-26 and same has been approved in the 26th TSPCC meeting held on 05.03.2025 and accordingly, project cost has been taken.

2.72 RVPN submitted that any revision to a scheme is approved by the WTD/BoD (revised sanction), followed by approval from the TSPCC, and is subsequently included in the investment petition. Such revisions are consistently documented in the MoMs of TSPCC, highlighting the revision in the scope of work. Petitioner submitted the MoMs of TSPCC approval.

2.73 RVPN submitted that the schemes for 220 kV GSS Batina and Manda were approved in the 26th TSPCC meeting held on 05.03.2025. These schemes have been included in the Interlocutory Application as part of the Investment Plan Petition for FY 2025-26.

2.74 RVPN submitted that the investment petition for FY 2025-26, as detailed in Form-6, highlights transmission schemes that have either already been undertaken or are planned to be executed through Private Sector Participation (PPP mode) or Tariff-Based Competitive Bidding (TBCB) mode. Additionally, RVPN has filed an investment petition for FY 2025-26 for approval of transmission schemes and capital expenditures amounting to

Rs. 5,700 crore. Further, these schemes are not included in the original investment plan petition.

2.75 RVPN submitted that in accordance with the prescribed procedure, each transmission scheme is first subjected to a detailed techno-commercial viability study, followed by its approval by the WTD/BoD. Subsequently, the scheme is forwarded for necessary approval from the Government of Rajasthan. Pursuant to Regulation 3(1) of the Rajasthan Electricity Regulatory Commission (Investment Approval) Regulations, 2006, the approved Detailed Project Reports (DPRs) for each new proposed scheme, duly sanctioned by the competent authority, are invariably submitted to the Commission for its review and consideration.

2.76 RVPN submitted that Section 3 of Act of 2003 provides for the formulation of a National Electricity Policy and National Tariff Policy. In terms of the above provision, the Central Government has to formulate the National Electricity Policy and National Tariff Policy in consultation with the State Governments and the Central Electricity Authority. Section 86 defines the functions of the State Commission whereas Section 181 empowers the State Commission to make Regulations. In discharge of its functions, the State Electricity Regulatory Commissions are required to be guided by the provisions contained in National Electricity Policy as well as the National Tariff Policy as also the directions which may be issued by the State Government under Section 108 (Directions by the State Government) of the Act of 2003.

2.77 RVPN submitted that all transmission schemes are meticulously planned after conducting comprehensive load flow studies. The results of these load flow studies are incorporated as an integral part of the DPR of each scheme.

DPR of each scheme which also includes the load flow studies are discussed in the TSPCC meeting.

2.78 RVPN submitted that with respect to schemes of 400 kV and above, such schemes are subject to approval by the Central Electricity Authority (CEA). The CEA undertakes a holistic analysis of these schemes through integrated simulation and load flow studies, which are crucial for ensuring grid stability and maintaining system reliability on a national scale.

2.79 RVPN submitted that this approach aligns with the regulatory framework and ensures that all schemes are designed and evaluated with due regard to technical and commercial feasibility, grid stability, and overall system integrity.

2.80 RVPN submitted that the PSDF has suspended funding for a period of one year and has declined to approve the funding for the STATCOM scheme. The Commission (RERC) has not granted approval for the implementation of STATCOMs for the financial year 2024-25. Furthermore, the Commission has amended the threshold limit, increasing it from Rs. 250 Crore to Rs. 300 Crore, pursuant to the RERC (Terms and Conditions for Determination of Tariff) Regulations, 2025.

2.81 RVPN submitted that it shall undertake a comprehensive revision of the load flow study concerning the individual STATCOM installations. Consequently, a Detailed Project Report (DPR) shall be meticulously prepared for submission to the Board of Directors (BOD) for approval of administrative and financial sanction (A&F).

2.82RVPN submitted that all the mentioned parameters are part of the Detailed Project Report (DPR), which has already been submitted to the Hon'ble Commission. The expenditure for various schemes has been provided up to the previous March. The provision for these schemes has been mentioned for the same financial year as well as the upcoming financial year in the investment petition. The phasing of expenditure for the schemes has been detailed in Form-2 of the investment petition for FY 2025-26.

2.83RVPN submitted that it shall duly incorporate the proposal for the STATCOMs into the interlocutory application (IA) filed as part of the Investment Plan Petition for the financial year 2025-26, in accordance with applicable procedural norms and statutory requirements.

2.84RVPN submitted that it confirms that the highest marginal cost of power procurement from thermal stations was included in the NPV calculation. However, the negative NPV indicates that, within the 5 to 10-year period, the operational savings from reduced losses do not exceed the initial capital cost. This short-term result does not diminish the long-term value of these schemes, as the full benefits of reduced transmission losses may become evident beyond the current calculation horizon. Additionally, the cost-benefit ratio for each scheme has been clearly outlined in the respective Detailed Project Reports (DPRs).

2.85RVPN submitted the list of the RE evacuation schemes included in the investment plan petition for FY 2025-2026. As per CEA's report installed generation capacity in the Rajasthan control area includes the Solar plant connected to the STU network and ISTS network. Power from the solar projects connected on ISTS network is generally evacuated outside Rajasthan and not used to meet the RPO of Rajasthan DISCOMs. All the bulk

power evacuation schemes of Rajasthan STU are planned in coordination with the CTUIL after performing the required load flow studies. Hence, these schemes are complimentary in nature to each.

2.86RVPN submitted that work orders for transmission schemes have already been issued, and RVPN is progressing at a swift pace, ensuring timely completion of these projects. Between FY 2018-19 and FY 2022-23, execution of works in various transmission schemes across regions was affected by factors including the COVID-19 pandemic, the Great Indian Bustard (GIB) conservation efforts, forest and statutory clearances, as well as regulatory constraints related to the RTM limits.

2.87RVPN submitted that it is projected to incur the highest capital expenditure in the upcoming fiscal year FY 2025-26 and beyond, in relation to its ongoing and planned projects.

2.88RVPN submitted that approved investment plan is of Rs 2985.26 Crore for FY 2024-25 wherein, an expenditure of Rs 1685.88 Cr (without IDC) has been incurred up to Feb, 2024. The deposit works are not part of Investment Plan but executed on users contribution only.

2.89RVPN submitted the achievements given up to Dec'23 in the instant petition of investment plan for FY 2024-25, thereafter, substantial progress is made updated position up to 31st January 2025. Few slippages are due to field related issues/ non supply of material & shall be achieved in 1st Quarter of FY 2025-26.

2.90RVPN submitted that the work orders for the Kalisindh TPS scheme has been issued, and the execution of the work is progressing at full speed. The major

expenditures are expected to be incurred in the Financial Years 2024-25 and 2025-26.

2.91 RVPN submitted that the State Empowered Committee, chaired by the Chairman of RERC, has decided to develop the 400 KV GSS Sangod with a 20 km LILO of the 400 KV D/C Kalisindh TPS-Anta transmission line under the Public-Private Partnership (PPP) mode. The aforementioned scheme is listed in Form-6, which highlights transmission schemes that have either already been undertaken or are planned to be executed through Private Sector Participation (PPP mode) or Tariff-Based Competitive Bidding (TBCB) mode.

2.92 RVPN submitted the chronological status for delay for 400 KV D/C Suratgarh TPS - Babai Line. Additionally, the scheme-wise expenditure up to the last financial year is provided in Form-2 of the instant petition for FY 2025-26. The dedicated circle i.e. SE (QC, Inspection and Monitoring) is already functional, who undertakes the monitoring of all the projects of RVPN. Circulation publication of achievement and progress reports on RVPN's website helps and promotes transparency, accountability, and efficient project management, all of which are crucial for ensuring that RVPN's initiatives contribute to the timely and effective delivery of electricity services.

2.93 RVPN submitted that it has approved a modification in the execution method for the installation of the Shunt Capacitor Bank at various 132 kV GSSs, which will now be carried out on a departmentally funded basis (20% equity, 80% debt). The work order for the capacitor bank has been issued, and it is planned to be commissioned in FY 2025-26.

2.94 RVPN submitted that it considers the new system as per provisions of Design Criteria and Selection of The Transmission and Distribution Schemes)- of RERC (Investment Approval) Regulations 2006 and results of load flow studies.

2.95 RVPN submitted that the investment petition for the aforesaid schemes has been submitted to the RERC for FY 2025-26 on 13.12.2024, subsequently State Level Committee on Transmission (SCT) in its meeting on 03.12.2024 has recommended execution of these schemes, under the RTM mode. The approval/recommendation of SCT from the Energy Department, Government of Rajasthan (GOR) has also been received. The approval of Commission on above is yet to come and after receiving approval of Commission on execution of above under the RTM mode, RVPN would immediately initiate the bidding process.

2.96 RVPN submitted that Physical and financial progress of all the EHV works are being regularly monitored by monitoring wing of RVPN. Higher authorities also take review progress meetings at various levels in order to avoid time overrun & cost overrun in the schemes. These schemes are required to meet the future load demand and schemes proposed in western parts of Rajasthan will also help to evacuate RE power .

2.97 RVPN submitted that 5 Nos. of projects i.e. 765 kV GSS Jaisalmer, 765 kV GSS Kankani (Jodhpur), 400 kV GSS Bikaner (New) [Upgradable to 765 kV GSS], 400 kV GSS Bhadla (New) [Upgradable to 765 kV GSS] & 400 kV GSS Kumher and associated transmission system to the Hon'ble RERC for FY 2025-26 on 13.12.2024, subsequently State Level Committee on Transmission (SCT) in its meeting on 03.12.2024 has recommended execution of these schemes under the RTM mode.



2.98 RVPN submitted that the approval/recommendation of SCT from the Energy Department, Government of Rajasthan (GOR) has also been received.

2.99 RVPN submitted that it always strive to complete the approved projects on time, sometime due to contractor issues, ROW problems, statutory clearances etc. it get delayed, which are being handled for effective, resolution and early completion of projects.

2.100 RVPN submitted that the scheme at Serial No. 2 is in process for execution under TCB mode. Scheme at serial no. 4 is under technical examination by the Central Electricity authority. After receipt of approval of the scheme from CEA scheme will be submitted to the SCT for decision on the mode of execution.

2.101 RVPN submitted that schemes for the 765 kV Substation at Nagaur, 400 kV substations at Dechu, Banswara, Dahra (Kota), and Sawai Madhopur are currently under feasibility examination and have not yet been technically approved. Moreso, the 220 kV GSS Pokhran has been dropped due to the Greater Indian Bustard (GIB) issue and transmission line constraints and in place of the 220 kV GSS Pokhran, the 220 kV GSS Betina has been approved. The 220 kV GSS Betina will enhance the reliability of power supply to the Betina, Pokhran, Jaisalmer and surrounding regions and will also support the long-term load demand of the area. Furthermore, 220 kV GSS Hemda has been included in the Interlocutory Application (IA) and the 220 kV GSS Lamba Jatan has been included in the Investment Plan Petition for FY 2025-26.

2.102 RVPN submitted that it has been carried out feasibility analysis; load flow study and technical examination of schemes considering the Sub-station, upstream network and downstream network as a single scheme. All

schemes have been approved by the WTD /BoD of RVPN and issued Administrative financial sanction (A&FS) of complete scheme including GSS, associated line, bays and capacitor bank.

2.103 RVPN submitted that Transmission charges cannot be directly compared across states, as each state has unique geographical conditions and varying transmission network configurations. These configurations include a mix of different voltage levels which affect the overall transmission system's design and operational costs. Moreover, the capital and revenue expenditures required to maintain and upgrade these networks depend on several factors, including the distances over which electricity needs to be transmitted, as well as the specific mix of transmission infrastructure in place.

2.104 RVPN submitted that additionally, the transmission company has a critical responsibility to ensure that power supply meets the load demand of the state. This requirement is influenced by the state's specific energy needs, topography, and population density, making it a complex task to evaluate in terms of cost and benefit alone. The nature of this responsibility means that transmission charges cannot be purely analyzed from a financial or cost-benefit perspective, as there are broader, more intricate factors at play in ensuring a reliable and efficient power supply to meet state-level demand.

2.105 RVPN submitted that as the Financial year 2024-25 has not completed so far, actual receipts of resources data can be provided after financial closing of FY 2024-25.

2.106 RVPN submitted that as per the norms and equity allowed by the Government of Rajasthan (GOR) on a year-to-year basis, the entire

expenditure incurred on the transmission system is spread across entire Rajasthan within the RVPN network and it has been accounted for.

2.107 RVPN submitted the DPR of Procurement of Distance Protection Relays (242Nos.), Differential Protection Relays (424Nos.), Over Current & Earth fault Relays, ToD meters at various GSSs.

2.108 RVPN submitted the existing system of RVPN as on dated 31.01.2025. Heavy voltage variations have been observed at multiple locations in Rajasthan, including Dholpur, Bharatpur, Hinduan, Alwar, Udaipur, Banswara, Dungarpura, and western Rajasthan. Additionally, there are load constraints at multiple locations due to electrical loading on lines and transformers. In view of the RE evacuation constraints in western Rajasthan, the proposed investment aims to strengthen the transmission lines and system strengthening of RVPN. This investment will make the system more reliable and enhance the RVPN Transmission schemes for the evacuation of 10 GW from western Rajasthan and will be sufficient for RE evacuation to meet the RPO of Rajasthan DISCOMs.

2.109 RVPN submitted that New PSDF scheme for the 'Establishment of Security Operation Centre (SOC) at SLDC Rajasthan' has been submitted for approval of the PSDF grant. The details of the aforementioned PSDF scheme, along with the supporting documents, have already been provided to RERC.

2.110 RVPN submitted that 400/220kV, 2x 500MVA, Grid Substation (GSS) at Hanumangarh is being constructed at location in the village-Kenchiya.

- 2.111 RVPN submitted that the schemes were re-examined by RVPN and submitted to SCT for consideration which was discussed in the SCT meeting held on dated 03.12.2024.
- 2.112 RVPN submitted that at present, work of 146.849km out of 245.303km 400kV D/C Suratgarh TPS-Babai (Jhunjhunu) line has been completed & charged on rated 400KV voltage for anti-theft and balance work of the is presently at full swing, it will be completed at the earliest with the present pace. Work order for balance works of the lines on turnkey mode has been awarded on 15.06.2024 with scheduled completion on period of one year.
- 2.113 RVPN submitted that the Equity of Rs. 402.5391 Cr has been approved by Government of Rajasthan (GoR), against proposed Equity of Rs. 1160Cr in its Budget Announcement on dated 19.02.2025.
- 2.114 RVPN submitted that details of physical target FY 2024-25(working target/achievement) and proposed for the year 2025-26 (target) in the Form-2 are available at Col. 8& 9 of physical target. RVPN enclosed the details of physical targets FY 2024-25(working target/ achievement) & proposed FY2025-26. RVPN submitted the copy of order of NCLT on dated 16.03.2023.
- 2.115 RVPN submitted that pursuant to the Clause 3.119 of Commission's order dated 23rd July, 2024, RVPN conducted an investigation in to the reasons for the significant transmission losses incurred. The investigation focused on analyzing trends over the past four years i.e. FY 2019-20 to FY 2023-24.
- 2.116 RVPN submitted that the analysis revealed a notable spike in transmission losses during the months of Nov. to March due to high demand for

agricultural load during the Rabi season. As per GoR directions, two block supply in agriculture was implemented in a phased manner across all the districts of Rajasthan from 2020-21 to 2023-24. This change in supply pattern resulted that transmission system remains lightly loaded during night hours and overloaded during day hours. An analysis of peak load during FY 2022-23 revealed that the peak load of 17026 MW was recorded at 14.30 hrs. on 18th Jan. 2023. In contrast a load of 6144 MW recorded at 4.15 hrs. on 30th Jan., 2023. The investigation estimated that the peak load would have been reduced to 14956 MW if agriculture power supply had been in three blocks instead of two.

2.117 RVPN submitted that as the two block supply in agriculture increased, the transmission system losses also increased. This is attributed to the following factors:-

- Increase peak demand during day hours.
- High loading on transmission lines and equipments
- Increase energy losses due to higher current flows.

Therefore, the main reason of high transmission losses is the implementation of two block supply in agriculture across Rajasthan.

Furthermore, the other factors contributing to transmission losses are as follows:-

- Delay in the commissioning of 220kV and 400 kV transmission system.
- Delay in commissioning of 33 kV shunt capacitor banks.

These factors combined with the impact of agricultural load have resulted in increased transmission system losses for RVPN.

2.118 RVPN submitted that the diversion or removal of transformers, as per system requirements, has been decided upon and approved by the competent

authority. RVPN submitted the requisite details of transformer diversions/reshuffling, along with copies of the approvals.

2.119 RVPN submitted the number of transformers with capacity of each of such transformers existing at present at 400 KV GSS Bhadla as well as at 400 KV GSS Ramgarh and the present load for both the GSS.

2.120 RVPN submitted that the Commission has directed execution of transmission schemes costing more than Rs. 250 Cr including 765 kV GSS (Jaisalmer) new under TBCB Mode. However, the execution of work of construction of 2Nos. bays for D/C line from 765 KV Jaisalmer at 400 kV GSS Jaisalmer 2 end is under progress which was approved under RTM mode.

2.121 RVPN submitted that 220 KV GSS Banar (Distt- Jodhpur) with associated line has been commissioned on dated 08.10.2024. As per Regulation 4(7) of RERC regulations (Investment approval), 2006, petitioner can made expenditure within the specified time limit of 2 years from the commissioning Financial Year (FY 2023-24) i.e up to FY 2025-26. The investment provision has been kept for FY 2025-26 for certain miscellaneous work under the schemes.

2.122 RVPN submitted that 132kV D/C Chhonkarwada (220 KV GSS) -Bhusawar line has been commission on dated 05.01.2025. In the Hindaun and Bharatpur region, 132 kV GSS Katoti (PPP), 132 kV GSS Bhusawar, 132 kV GSS Bayana, 132 kV GSS Weir, 132 kV GSS Bayana and 132 kV GSS Cheekru are feeding power supply to nearby region. These GSS are catered by either 220 kV GSS Hindaun or 220 kV GSS Nadbai which is not sufficient. Therefore, to cater load demand and system strengthening, a 132 kV D/C Chhokarwara-Bhusawar line is commissioned.

2.123 RVPN submitted that it has not claimed any investment for the 132 KV Feeder Bays at Hamirgarh and Suwawa in Form-2 of the Investment Petition for FY 2025-26. The 132 KV Bay at 132 KV GSS Jahajpur was commissioned on 23.05.2022, as mentioned in Form-2 of the Investment Petition for FY 2025-26. The bay is charged at no load at the Jahajpur end. No investment has been claimed for the mentioned bay in Form-2 of the Investment Petition for FY 2025-26. RVPN has not claimed any investment for the 132 KV Feeder Bays at Shahpura- Jahajpur in Form-2 of the Investment Petition for FY 2025-26.

2.124 RVPN submitted that due to the non-availability of the 160 MVA transformer at the 220 kV GSS Bhiwadi, there is a requirement to meet the load demand for the Bhiwadi area. RVPN has been allotted a 100 MVA transformer instead of the originally planned 160 MVA transformer at the 220 kV GSS Bhiwadi to ensure uninterrupted power supply in the Bhiwadi area.

2.125 RVPN submitted that as of 01.07.2024, the total capacity of the transformer at 132 kV GSS Champapura is 50 MVA. The recorded load at 132 kV GSS Champapura has exceeded 80% of the transformer's rated capacity. Therefore, augmentation of the 132 kV GSS Champapura is required which includes replacing the existing transformer with one of higher capacity. Therefore, 40/50 MVA transformer, along with an additional 31.5 MVA transformer has been allotted to replace the lower-capacity transformer.

2.126 RVPN submitted that 132 kV GSS Bakani (+20/25-10/12.5) was commissioned on 11.07.2024. The commissioning date of 132 kV GSS Bakani (+20/25-10/12.5) may be read as one time due to a typographical error.

2.127 RVPN submitted that the scheme is first studied/ checked for techno-commercial viability and then approved by WTD/BoD followed by necessary approval from Govt. of Rajasthan. Copy of approved DPRs from competent authority of each new proposed scheme is invariably submitted to the Commission as per Regulation 3(1) of Regulations, 2006 (Investment Plan approval).

### **Commission's Views on Issues Raised by Stakeholders**

2.128 The Commission has taken note of all the comments/suggestions/observations of the Stakeholders both in writing as well as during the course of hearing and RVPN's responses to them. The Commission has attempted to capture all the comments/suggestions/observations. However, in case any comment/suggestion/observation is not specifically elaborated, it does not mean that the same has not been considered. The Commission has considered all the issues raised by the Stakeholders and RVPN's response on these issues while carrying out the detailed analysis of the Investment Plan for FY 2025-26 in accordance with applicable RERC Regulations as detailed in the subsequent Sections of the Order.



### **SECTION 3: Analysis of Investment Plan for FY 2025-26**

#### **Proposed plan and Commission's approval**

- 3.1 RVPN has submitted the investment plan of Rs. 5700.00 Cr. including Rs 45.00 Cr. pertaining to SLDC business for FY 2025-26 on 20.12.2024 for approval of the Commission.
- 3.2 RVPN later submitted an Interlocutory Application(IA) on 10.03.2025 for additional investment of Rs. 359.00 Cr in the matter of approval of Investment Plan for FY 2025-26 (Revised). RVPN submitted that the GOR has announced more schemes vide the budget announcement. Also, in view of local need and strengthening of system, some more schemes have been identified. These schemes are very important to execute in field to meet the increasing load requirement, to strengthening the transmission system, voltage regulation and reduction in the transmission losses.
- 3.3 As regards funding, the schemes are mainly proposed to be funded from Plan funds, i.e., Bonds, loan assistance from Nationalised Banks, Power Finance Corporation (PFC), National Bank for Agriculture and Rural Development (NABARD), HUDCO, National Capital Region Planning Board (NCRPB), Rural Electrification Corporation (REC), ADB, KfW, PSDF Fund and State Government Equity etc. The deposit works are to be executed with the funds of user's contribution.
- 3.4 The Petitioner further submitted that during FY 2025-26, 491 Ckt-KM 400 KV Line , 502 Ckt-KM 220 KV Lines, 4 No. of 220 KV Substations with capacity of 640 MVA, 1206.75 Ckt-KM 132 KV lines, 35 No. of 132 KV Substations with capacity of 1610.50 MVA are targeted for commissioning. The Petitioner has also proposed augmentation of 3000 MVA capacity for the FY 2025-26. The Petitioner further submitted that for completion of transmission schemes,

construction of lines and allotment of lands, various statutory clearances like Right of way, Forest clearance, PTCC clearance, Railway crossing are required to be obtained from various departments.

3.5 The Commission vide data gap dated 08.01.2025 sought various queries in the instant petition. RVPN vide their letter dated 10.02.2025 has replied the queries and recategorized its investment plan for FY 2025-26. Furthermore on 10.03.2025, RVPN submitted an Interlocutory Application revising the total proposed investment to Rs. 6050 Crore from earlier proposed Rs. 5700 Crore.

3.6 The detailed Investment Plan along with no. of projects as proposed by the Petitioner for FY 2025-26 is shown in the table below:

**Table 2: Investment Plan proposed by the Petitioner (Rs. Crore)**

<b>Sl. No.</b>	<b>Particulars</b>	<b>Revised No. of Projects</b>	<b>Revised Investment during 2025-26 (Rs. Crore)</b>
1	Ongoing schemes (400, 220 and 132 KV)	192	3665.53
2	New Schemes (765, 400,220 and 132 KV)	77	1499.30
3	Carried Over Liabilities	1	1.50
4	PSDF Funded Ongoing Schemes	5	108.32
5	PSDF Funded New Schemes (Establishment of security operation center at Rajasthan SLDC)	1	8
6	Capacitor banks (MVAR)	2	18
7	STOMS extension	1	5
8	Procurement of Distance Protection Relays (242Nos.),	1	12

Sl. No.	Particulars	Revised No. of Projects	Revised Investment during 2025-26 (Rs. Crore)
	Differential Protection Relays (424Nos.), Over Current & Eearth fault Relays, ToD meters at various GSSs. ( Departmental)		
9	RTU, upgradation of existing SAS system ( Software and Hardware)	1	35
10	SAP-ERP & IT System	1	52.35
11	Augmentation (EAP & Plan)/ (Up gradation)	1	600
12	Automation/ SCADA System	1	45
<b>13</b>	<b>Total Investment Plan</b>	<b>284</b>	<b>6050</b>

3.7 The scheme wise details of the Investment plan as proposed by the Petitioner for FY 2025-26 is discussed in the subsequent paragraphs.

#### **A. Ongoing Schemes**

##### **Petitioner's Submission**

3.8 The Petitioner with regards to ongoing schemes has proposed One ninety two numbers of schemes/projects and capital investment of Rs. 3665.53 Crore.

##### **Commission's Analysis**

3.9 The Commission has observed that vide data gap reply dated 10.02.2025, RVPN recategorized its investment plan and accordingly proposed Rs. 3665.53 Cr. under the category 'Ongoing Schemes'.

- 3.10 From the revised proposal submitted by RVPN, it is observed that there are 48 no. of projects which are under implementation prior to 01.04.2023. The petitioner has proposed only an amount of Rs. 203.13 Crore under these schemes. It is also observed that Rs. 171.85 Crore (approx.) expenditure is still not claimed for the project prior to 01.04.2023.
- 3.11 RVPN in its reply dated 28.04.2025 submitted that there are total 48 schemes which have been initiated prior to 01.04.2023, out of which 34 schemes have been commissioned and the remaining 14 schemes are planned to be commissioned during FY 2025-26 and FY 2026-27. Accordingly, there is no mandatory requirement to propose full expenditure for the aforesaid schemes in the present petition as none of the schemes are being affected by the statutory deadline and the same will be proposed at appropriate time when the need arises.
- 3.12 RVPN is hereby directed to henceforth propose 'Ongoing Schemes' under the following two categories: (i) Additional capitalization of Commissioned Schemes, and (ii) Schemes where work is in progress, to be classified under the head 'Ongoing Schemes'.
- 3.13 Further, It is very strange that RVPN is not proposing full expenditure even in FY 2025-26 for the project prior to 01.04.2023 which is already under implementation for more than three years. Commission has viewed this practice of RVPN very seriously as allocation in new projects/ other ongoing projects keeping aside the old projects is causing time over run and cost over run.
- 3.14 RVPN, therefore, is directed to complete these schemes at the earliest and furnish the completion report to the Commission.

- 3.15 The Commission has allowed the capital expenditure of Rs. 3665.53 Crore as proposed by petitioner for FY 2025-26 under the category "Ongoing schemes". The Commission shall carry out the prudence check of the actual capital expenditure of the completed schemes in the true up of respective year based on complete details submitted by the Petitioner. The Commission directs the Petitioner to submit the details of the schemes completed in FY 2025-26 including the detailed reasons for cost over-run, time over-run and IDC incurred for each scheme as against DPR value in its petition for truing up of ARR for FY 2025-26.
- 3.16 The Commission also directs the Petitioner to streamline their project implementation by creating a dedicated project monitoring cell which shall ensure completion of projects within proposed time limit.

## **B. New Schemes**

### **Petitioner's Submission**

- 3.17 The Petitioner with regards to New schemes has proposed Seventy Seven numbers of schemes/projects and capital Investment of Rs. 1499.30 Crore.

### **Commission's Analysis**

- 3.18 The Commission has observed that vide data gap reply dated 10.02.2025, RVPN recategorized its investment plan and accordingly proposed Rs. 1149.30 Cr. under the category 'New Schemes'.
- 3.19 RVPN later submitted an Interlocutory Application on 10.03.2025 for additional investment of Rs. 359 crore for 55 nos. schemes declared in state government budget announcement and other Scheme as per system requirement in FY 2025-26.
- 3.20 RVPN submitted that GOR has declared 47 Nos. of schemes in budget announcement for FY 2025-26. Out of 47 budget schemes, 37 schemes

have been included in this IA. Further, RVPN submitted that looking to the system requirement it has also considered 18 schemes to cater future load demand and voltage stability.

- 3.21 RVPN vide its reply on 28.04.2025 submitted that all the necessary sanctions/approvals have been received for all the 55 schemes proposed vide interlocutory application no. 1/2025 filed on 10.03.2025 in the present petition. The Petitioner has also obtained the aforesaid approvals/sanctions for all the New schemes also, which have been proposed in the present petition prior to filing of interlocutory application seeking proposal of additional schemes.
- 3.22 RVPN further, in its reply on 28.04.2025 submitted that the estimated cost of the scheme “400 kV GSS Amber (Jaipur-North)” has been revised to Rs. 295.74 Cr. (with IDC) from Rs. 1075.34 Cr. due to non-feasibility of 400 kV D/C Amber-Babai line (Quad Moose) which was earlier considered in the proposal.
- 3.23 From the proposal submitted by RVPN, it has been observed that Petitioner has proposed 77 numbers of schemes/projects and capital Investment of Rs. 1499.30 Crore under the head ‘New Schemes’. These New Schemes have been further classified as follows: (i) Schemes above Rs. 300 Crore (ii) Schemes below Rs. 300 Crore.

**(i) Schemes above Rs. 300 Crore**

- 3.24 The Commission in the Regulation “Rajasthan Electricity Regulatory Commission (Terms and Conditions for Determination of Tariff) Regulations, 2025 has specified the threshold limit to Rs. 300.00 Crore for development of intra-State transmission projects through TBCB. Further, in exceptional

circumstances, Commission may grant exemption to this limit on case to case basis.

3.25 The Commission has observed that out of Rs. 1499.30 Crore proposed under the category new schemes in the investment plan, Rs. 1003.60 Crore are claimed for the schemes whose cost as per investment proposal are above Rs. 300 Crore as shown in the table below: -

**Table 3: Projects costing above Rs. 300 Crore (Rs. in Crore)**

S.No.	Name of the Work/Project	Estimated Revised cost of scheme/Project (With IDC)	Original/ cost of Investment Proposed in FY 2025-26
1	765 kV GSS Jaisalmer (New location) alongwith associated lines	3060.89	316
2	765/400 kV GSS Kankani (Jodhpur) alongwith associated lines	3089.94	335
3	400 kV GSS Bhadla (New) [Upgradable to 765 kV GSS] alongwith associated lines	1678.20	191
4	400 kV GSS Bikaner (New) [Upgradable to 765 kV GSS] alongwith associated lines	699.86	80
5	400 kV GSS Kumher alongwith associated lines	421.07	81.60
	<b>Total</b>	<b>8949.96</b>	<b>1003.60</b>

**Scheme No. 1- 765 kV GSS Jaisalmer (New location) alongwith associated lines**

3.26 RVPN vide its IA filed on 10.03.2025 submitted that there is transmission constraint to evacuate RE power from the 400 kV GSS Jaisalmer. There is approximately 3981.45 MW RE commissioned on 400 kV GSS Jaisalmer-II and 400 kV GSS Akal.

- 3.27 RVPN further submitted that Transmission lines associated with the 400 kV GSS Jaisalmer-II are critically overloaded above the thermal limits. Further, approximately 1510 MW additional RE power is also supposed to be commissioned in the area. To evacuate this additional power, Jaisalmer-Jodhpur-Phagi 765 kV Transmission Corridor is required.
- 3.28 There is inflow of power from ISTS network to RVPN network at 400 kV GSS Jaisalmer during high solar generation hours. This also overloads the transmission lines associated with the 400 kV GSS Jaisalmer. Therefore, additional transmission system is required on urgent basis.
- 3.29 RVPN further submitted that it has proposed this scheme for grant under Green Energy Corridor (GEC) Phase III from the Ministry of New and Renewable Energy (MNRE). RVPN submitted the recommendation of Energy Department, Government of Rajasthan.

**Scheme No. 2- 765/400 kV GSS Kankani (Jodhpur) alongwith associated lines**

- 3.30 RVPN vide its IA filed on 10.03.2025 submitted that 765 kV Jaisalmer-Jodhpur-Phagi Corridor is a part of 115GW RE power evacuation from Rajasthan as decided by CEA under 500GW RE by 2030 in India.
- 3.31 In view of above facts, this 765 kV Jaisalmer-Jodhpur-Phagi Corridor is urgently required for RE power evacuation which can be completed in minimum time through RTM mode only.
- 3.32 RVPN further submitted that it has proposed this scheme for grant under Green Energy Corridor (GEC) Phase III from the Ministry of New and Renewable Energy (MNRE). RVPN submitted the recommendation of Energy Department, Government of Rajasthan.



### **Commission's Analysis**

- 3.33 The Commission observes that RVPN has claimed expenditure for the scheme "765 kV GSS Jaisalmer (New location) along with associated transmission lines" having estimated cost of Rs. 3060.89 crore and also the scheme "765/400 kV GSS Kankani (Jodhpur), along with associated transmission lines" having estimated cost of Rs. 3089.94 crore.
- 3.34 Further, RVPN vide its IA submitted that, Jaisalmer-Jodhpur-Phagi 765 kV Transmission Corridor is required to evacuate additional RE power from Jaisalmer region. Since the proposed 765 kV GSS at Jaisalmer and Jodhpur are integral components of this transmission corridor, they should be treated as a single, integrated scheme. We observe that the two proposed schemes are technically and operationally interlinked and should be considered as one unified scheme.
- 3.35 The Commission further, observes that RVPN submitted the Detailed Project Reports (DPRs) for the above two schemes on 12.08.2022, with a combined estimated cost of Rs. 6,150.82 crore. Further, RVPN also submitted the revised approximate cost estimates amounting to Rs. 7,426.33 crore (Rs. 3591.77 crore and Rs. 3834.56 crore) for the above-mentioned two schemes. It is noted that the estimated costs of these two schemes are substantially higher than the threshold limit of Rs. 300 crore.
- 3.36 RVPN had proposed the expenditure for these schemes in its Investment Plan Petition for FY 2022–23. However, the Commission, in its order dated 01.12.2022, disallowed the schemes and directed RVPN to develop them through the Tariff-Based Competitive Bidding (TBCB) process only. The Commission, further, in its orders dated 25.05.2023 and 26.07.2023, disallowed the aforementioned schemes to be developed through RTM mode. RVPN submitted that these schemes are required on urgent basis

for evacuation of additional RE power. Despite the urgency, the schemes have not been developed even after a lapse of two and half years.

- 3.37 RVPN has now proposed these schemes under Green Energy Corridor -III (GEC) scheme of Government of India. The Commission, vide order dated 08.04.2022, sought confirmation regarding the certainty of the 40% grant envisaged under the schemes of GEC. However, RVPN has not submitted any confirmation or approval from the Government of India in this regard. The Petitioner has also failed to demonstrate any exceptional circumstances in favour of its prayer.
- 3.38 Since the schemes involve substantial investment significantly exceeding the threshold limit of Rs. 300 crore and in view of the prior direction to adopt the TBCB route, the Commission deems it appropriate to disallow the development of these two schemes under the Regulated Tariff Mechanism (RTM) mode. The Commission directs RVPN to undertake the execution of the aforementioned schemes through the TBCB mode.

**Scheme No. 3- 400 kV GSS Bhadla (New) [Upgradable to 765 kV GSS] alongwith associated lines**

- 3.39 RVPN vide its IA filed on 10.03.2025 submitted that scheduled commissioning period of NTPC solar park at Bhadla is 12 months. Hence, 400 kV Bhadla (New) is required on urgent basis for evacuation of additional RE power from Bhadla region.
- 3.40 RVPN further submitted that it has proposed this scheme for grant under Green Energy Corridor (GEC) Phase III from the Ministry of New and Renewable Energy (MNRE). RVPN submitted the recommendation of Energy Department, Government of Rajasthan.

**Scheme No. 4- 400 kV GSS Bikaner (New) [Upgradable to 765 kV GSS] alongwith associated lines**

- 3.41 RVPN vide its IA filed on 10.03.2025 submitted that scheduled commissioning period of RVUN solar park is 15 months. There is no alternate transmission network which can be used for evacuation of 810MW power.
- 3.42 The state of Rajasthan will get benefited by this power as whole power will be used for the State. Hence, 400 kV Bikaner (New) is required on urgent basis. This low cost RE will ultimately benefit the consumer of Rajasthan in term of low tariff rates.
- 3.43 RVPN further submitted that it has proposed this scheme for grant under Green Energy Corridor (GEC) Phase III from the Ministry of New and Renewable Energy (MNRE). RVPN submitted the recommendation of Energy Department, Government of Rajasthan.

**Commission's Analysis**

- 3.44 The Commission observes that RVPN has claimed expenditure for the scheme "400 kV GSS Bhadla (New) [Upgradable to 765 kV GSS] alongwith associated lines" having estimated cost of Rs. 1678.20 crore and also the scheme "400 kV GSS Bikaner (New) [Upgradable to 765 kV GSS] alongwith associated lines" having estimated cost of Rs. 699.86 crore.
- 3.45 Further, RVPN vide its IA submitted that, both the switching stations are required to evacuate additional RE power from Bhadla-Bikaner region. RVPN submitted that for evacuation of RE power from RVUN Solar Park , 400 kV switching station at Bikaner (new) is required. RVPN also submitted that for evacuation of power from NTPC solar park at Bhadla, it requires switching station at Bhadla and 765 kV line from Bhadla to Bikaner. This

power will be further evacuated from Bikaner 400 kV switching station(new) through LILO of Suratgarh-Bikaner line and thereafter Suratgarh -Babai line as per DPR.

- 3.46 Since the proposed 400 kV switching stations at Bhadla and Bikaner and 765 kV line from Bhadla to Bikaner are integral components of this transmission corridor, they should be treated as a single integrated scheme to evacuate power from Bhadla-Bikaner region as per its DPR. We observe that the two proposed schemes are technically and operationally interlinked and should be considered as one unified scheme.
- 3.47 The Commission observes that RVPN submitted the Detailed Project Reports (DPRs) for the above two schemes on 12.08.2022, with a combined estimated cost of Rs. 2378.06 crore. Further, RVPN also submitted the revised approximate cost estimates amounting to Rs. 2653.64 crore (Rs. 1891.43 crore and Rs. 762.21 crore) for the above-mentioned two schemes. It is noted that the estimated costs of these two schemes are substantially higher than the threshold limit of Rs. 300 crore.
- 3.48 RVPN had proposed the expenditure for these schemes in its Investment Plan Petition for FY 2022–23. However, the Commission, in its order dated 01.12.2022, disallowed the schemes and directed RVPN to develop them through the Tariff-Based Competitive Bidding (TBCB) process only. The Commission, further, in its orders dated 25.05.2023 and 26.07.2023, disallowed the aforementioned schemes to be developed through RTM mode. Despite the urgency, the schemes have not been developed even after a lapse of two and a half years.
- 3.49 RVPN has now proposed these schemes under Green Energy Corridor -III (GEC) scheme of Government of India. The Commission, vide order dated

08.04.2022, sought confirmation regarding the certainty of the 40% grant envisaged under the schemes of GEC. However, RVPN has not submitted any confirmation or approval from the Government of India in this regard. The Petitioner has also failed to demonstrate any exceptional circumstances in favour of its prayer.

- 3.50 Since the schemes involve substantial investment significantly exceeding the threshold limit of Rs. 300 crore and in view of the prior direction to adopt the TBCB route, the Commission deems it appropriate to disallow the development of these two schemes under the Regulated Tariff Mechanism (RTM) mode. The Commission directs RVPN to undertake the execution of the aforementioned schemes through the TBCB mode.

**Scheme No. 5- 400 kV GSS Kumher alongwith associated lines**

- 3.51 RVPN vide its IA filed on 10.03.2025 submitted that Transmission lines in the Bharatpur and Dholpur area critically overloaded. Capacity of feeding 220 kV lines has been exhausted.
- 3.52 There is dependency of 220 kV GSS Bharatpur on 400 kV GSS Agra due to insufficiency of transmission system in Bharatpur, Rajasthan.
- 3.53 RVPN submitted that presently, 220 kV GSS Bharatpur is connected to 220 kV GSS Nadbai, 220 kV GSS Dholpur, Dholpur GTPS and Agra. 220 kV GSS Nadbai is fed from 220 kV GSS Chhonkarwada which is fed from 400 kV GSS Hindaun.
- 3.54 Due to radial nature of 400 kV network at 400 kV GSS Hindaun and 400 kV GSS Alwar, there is high voltage variations in the region specifically during the condition of high agriculture load. This condition is further worsening due to overloading of 220 kV S/C Bharatpur-Agra line. Present transmission

system is also not sufficient to cater load after implementation of 2-block agriculture load supply arrangement.

- 3.55 The existing peak demand loading of ICT's at various GSS has crossed 90 % of installed capacity, e.g., 220/132 kV ICT at 220 kV Bharatpur, 220/132kV ICT at 220 kV GSS MIA Alwar, 400/220 KV ICT at Hindaun and 220/132 kV ICT at 220 kV GSS Hindaun etc.
- 3.56 Therefore, creation of 400 kV GSS Kumher is required to address voltage variation issues, to cater future load demand and reliability of system. This will also reduce the dependency on the PGCIL's 400 kV GSS Agra.
- 3.57 RVPN in its additional submission dated 24.05.2025 filed letter dated 25.04.2025 wherein it has been informed to CEA that 400 kV GSS Kumher is part of RE Evacuation scheme because it will disperse the RE power at load centers.
- 3.58 Hence, creation of 400 kV GSS Kumher is required urgently. This can be achieved by execution of 400 kV GSS Kumher through RTM mode only. Future load demand of the Bharatpur area can be catered after creation of 400 kV GSS Kumher.
- 3.59 RVPN further submitted that it has proposed this scheme for grant under Green Energy Corridor (GEC) Phase III from the Ministry of New and Renewable Energy (MNRE). RVPN also submitted the recommendation of Energy Department, Government of Rajasthan.

### **Commission's Analysis**

- 3.60 The Commission observed that out of Rs. 1499.30 Crore proposed under the category new schemes in the investment plan, Rs. 81.60 Crore is

claimed for this aforementioned scheme having estimated cost of Rs. 421.07 crore.

- 3.61 We observe from the submission of RVPN that the available system in the region is causing voltage fluctuations and is unable to handle peak agricultural loads effectively. Several ICTs are overloaded, and key lines like the 220 kV Bharatpur–Agra line is stressed. To address these issues, a new 400 kV GSS at Kumher is proposed, which will improve reliability, support future load growth, and reduce dependence on PGCIL's 400 kV GSS Agra. The proposed scheme may relieve the loading on the 220 kV Transmission lines, RE evacuation, voltage improvement and cater load demand in the Bharatpur and Alwar region.
- 3.62 The Commission vide its data gap dated 08.01.2025 sought the recommendation of Government of Rajasthan in this respect.
- 3.63 The Petitioner vide its data gap reply on 10.02.2025 submitted that the State Committee of Transmission (SCT) in their meeting convened on dated 03.12.2024 has recommended this projects to be developed under RTM mode and also submitted the recommendation of Energy Department, Government of Rajasthan.
- 3.64 Further above projects have been approved by the TSPCC (Technical Committee) and the BoD/WTD of RVPN. We further observe that SCT has recommended the above projects to be developed under RTM mode. Further, RVPN also submitted the recommendation of Energy Department, Government of Rajasthan.
- 3.65 In view of above recommendation of SCT and Government of Rajasthan, and keeping in view the exceptional and urgent technical aspects elaborated above, the Commission deems it appropriate to allow

exemption under first proviso of Regulation 57 (3) of RERC (Terms and Conditions for Determination of Tariff) Regulations, 2025, to allow RVPN to develop this project i.e. 400 kV GSS Kumher alongwith their associated lines through RTM mode.

- 3.66 In view of above, the Commission has allowed the capital expenditure of Rs. 81.60 Crore for the scheme “400 kV GSS Kumher alongwith associated lines “ as proposed by Petitioner for FY 2025-26 under the category “New schemes above Rs. 300 Crore”.

**(ii) Schemes below Rs. 300 Crore**

- 3.67 RVPN has claimed Rs. 495.70 Crore in respect of the schemes whose cost as per instant petition of investment plan are below Rs. 300 Crore for FY 2025-26 under the category “New schemes”.
- 3.68 RVPN vide its IA filed on 10.03.2025 submitted that five schemes which were under approval under the category New Schemes of amount Rs 9.00 Cr (220 KV Nokhra, Manda ,Batina and 132 KV GSS Pal, Satda) has been removed from original petition and included in Interlocutory Application (IA).
- 3.69 The Commission observes that the Petitioner has claimed expenditure of Rs. 25.00 Crore for the scheme “Construction of Vidyut Bhawan Phase II at Jyoti Nagar, Jaipur”. Since this scheme is not linked to any of the transmission schemes, the Commission is of the view that the proposed schemes should be carried out as part of O&M expenses.
- 3.70 Further, it is observed that, vide Petition No. 1582/2019 filed by RVPN, the Commission on 08.10.2020 disallowed the cost towards construction of Vidyut Bhawan Phase - II. The relevant abstract of order dated 08.10.2020 is as under:-



*“3.35 Therefore, for construction of Vidyut Bhawan Phase - II, the Commission is of the view that these works cannot be considered as capital works, as they are not linked to any of the transmission schemes. Hence, the cost claimed under these works is not admissible and it may be carried out under O&M Expenses.”*

- 3.71 Vide Petition No. 464/16 filed by M/s Raj West Power Limited, the Commission on 24.02.2016 disallowed the cost towards the office building on the basis of decision of Hon'ble APTEL in its Judgment dated 30.08.2011 in Appeal No. 94 of 2006. The relevant abstract of order dated 24.02.2016 is as under:-

*“3.262 The Petitioner has claimed the cost of Rs. 2.62 Crore towards the office building at Jaipur (Contract of Upasana Colonisers) whereas stakeholders have pleaded for not allowing this cost. There is no dispute that the generating station is located at Barmer and office building is at Jaipur. Hon'ble APTEL in its Judgment dated 30.08.2011 in Appeal No. 94 of 2006 after examining the similar claim of NTPC has ruled that the common offices are not included in the definition of the generating station under the provisions of Electricity Act. Hence, the Commission has not allowed the cost of Rs. 2.62 Crore towards the office building at Jaipur in this order.”*

- 3.72 Further, vide Petition No. 1579/19 filed by RVPN, the Commission on 11.09.2020 disallowed the cost towards additional capitalization claimed against construction of administrative building and purchase of vehicles. The relevant abstract of order dated 11.09.2020 is as under:-

*“18 Also, for the additional capitalization claimed against construction of administrative building and purchase of vehicles, the*

*Petitioner submitted scheme wise details along with the supporting documents. The Commission is of the view that in accordance with the Regulation 17(1) and 17(2) of the RERC Tariff Regulations, 2014 these works cannot be considered as capital works. Also, they are not linked to any of the transmission schemes. Hence, the cost claimed under these works, i.e., Rs. 11.64 Crore is not admissible as an additional capital expenditure and it needs to be considered under O&M Expenses."*

3.73 Therefore, the Commission continuing with its earlier stand deems it fit to disallow the investment of Rs. 25.00 Crore claimed by the petitioner and the same needs to be considered as part of O&M Expenses.

3.74 We observe that RVPN has proposed 72 nos. of schemes. The Commission has approved the expenditure of Rs. 470.70 Crore as against Rs. 495.70 crore in respect of the new schemes below Rs. 300 Crore.

### **C. Carried Over liabilities**

#### **Petitioner's Submission**

3.75 The Petitioner in its Investment Plan has claimed carried over liabilities of Rs. 1.50 Crore. The Petitioner has claimed the same as liabilities towards the schemes/works which were already completed.

#### **Commission's Analysis:**

3.76 With regards to Carried Over liabilities, the Petitioner has claimed Rs. 1.50 Crore in respect of 220/132 kV lines , Bays and GSSs.

3.77 The Commission allows Rs. 1.50 Crore under the category "Carried over liabilities". Further, the Commission directs the Petitioner to submit the details of the expenditure incurred under carried over liabilities as part of its True Up of Petition.

#### **D. PSDF funded Ongoing Schemes**

##### **Petitioner's Submission**

3.78 The Petitioner in its Investment Plan has claimed ongoing scheme under PSDF Schemes amounting to Rs. 108.32 Crore.

##### **Commission's Analysis**

3.79 We observe that the Petitioner has mainly proposed Investment of Rs. 3.32 Cr. for Scheme of Reactors & protection deficiency , Rs. 80 Cr. for STNAM and RE integration scheme, Rs. 12.50 Cr. for Up-rating & refurbishment of existing 132 KV lines using HTLS Conductor, Rs. 3.50 Cr for Installation of 31 Nos. Numerical Busbar protection schemes for installation on 220kV Substations of RVPN and Rs. 9 Crore for Installation of Nitrogen Injection and Fire Prevention and Extinguishing System along with retrofitting work.

3.80 The Commission has allowed the capital expenditure of Rs. 108.32 Crore as proposed by the petitioner under this category.

#### **E. PSDF funded new Schemes**

##### **Petitioner's Submission**

3.81 The Petitioner in its Investment Plan has claimed new scheme under PSDF Schemes amounting to Rs. 8 Crore.

##### **Commission's Analysis**

3.82 We observe that the Petitioner has mainly proposed Investment of Rs. 8 Cr. for Establishment of security operation center at Rajasthan SLDC.

3.83 Commission vide data gap dated 08.1.2025 sought the approval of Government of India in respect of PSDF funded new schemes, RVPN in its reply dated 10.02.2025 submitted that the PSDF funded new schemes has been submitted for approval of PSDF grant .

- 3.84 RVPN in its additional submission dated 19.03.2025 submitted that, NLDC-Grid India has informed that Scheme for security operation centre (SOC) at SLDC Rajasthan has been discussed in the 87th TESC meeting dated 30.01.2025 and found generally in order. The same has been recommended for 90% grant i.e. of Rs. 10.74 cr. for further approval of Appraisal Committee of PSDF.
- 3.85 The Commission observed that for above scheme, RVPN has not got the approval of Government of India of PSDF Grant. The Commission, therefore, at this stage deems it fit not to consider Rs. 8 Crore for the above mentioned scheme.

**F. Capacitor Banks, STOMS Extension, Procurement of various Relays and RTU, upgradation of existing SAS system ( Software and Hardware)**

**Petitioner's Submission**

- 3.86 The Petitioner has claimed expenditure of Rs. 18 Crore towards Installation of Capacitor Banks, Rs. 5 Crore towards STOMS Extension, Rs. 12 Crore towards Procurement of Distance Protection Relays (242Nos.), Differential Protection Relays (424Nos.), Over Current & Earth fault Relays, ToD meters at various GSSs and Rs. 35 Crore towards RTU, upgradation of existing SAS system ( Software and Hardware).

**Commission's Analysis**

- 3.87 The Commission observes that the Petitioner has claimed expenditure of Rs. 12.00 Crore for the scheme "Procurement of various Relays".
- 3.88 The Commission is of the view that the proposed schemes should be carried out as part of O&M expenses. Therefore, Commission deems it fit to disallow the investment of Rs. 12.00 Crore claimed by the petitioner under the above scheme.

3.89 We also observe that Petitioner has claimed expenditure of Rs. 10.00 Crore for the scheme "Up-gradation of existing SAS System (software & hardware) at 22 Nos. substation in RVPN"

3.90 The Commission is of the view that the proposed schemes should be carried out as part of O&M expenses. Therefore, Commission deems it fit to disallow the investment of Rs. 10.00 Crore claimed by the petitioner under the above scheme.

3.91 The investments approved by the Commission under the category of Installation of Capacitor Banks, STOMS Extension and Work of Installation ,Integration & Maintenance of 133 Nos RTUs including replacement of old and obsolete RTUs and considering requirement at new substation and future provision are as shown in the table below:

**Table 4: Investment approved under following categories (Rs. Crore)**

Particulars	Claimed	Approved
Installation of Capacitor Banks	18	18
STOMS Extension	5	5
Procurement of Distance Protection Relays (242Nos.), Differential Protection Relays (424Nos.), Over Current & Earth fault Relays, ToD meters at various GSSs. (Departmental)	12	-
Work of Installation ,Integration & Maintenance of 133 Nos RTUs including replacement of old and obsolete RTUs and considering requirement at new substation and future provision	25	25
Up-gradation of existing SAS System (software & hardware) at 22 Nos substation in RVPN	10	-
<b>Total</b>	<b>70</b>	<b>48</b>

#### **G. Augmentation (EAP & Plan)/ (Up gradation)**

##### **Petitioner's Submission**

3.92 The Petitioner has claimed expenditure of Rs. 600 Crore towards Augmentation (EAP & Plan)/ (Up gradation) schemes.

### **Commission's Analysis**

3.93 We observe that Commission in the Investment Plan order for the FY 2023-24 directed RVPN to submit Augmentation schemes under the category of New Schemes along with the detailed project report of each schemes having cost more than Rs. 5 Crore. RVPN was also directed to provide the details of transformers which will be replaced and where the replaced transformer will be utilized. However, RVPN has not complied the same.

3.94 Commission vide data gap dated 08.01.2025 sought the reason for not submitting the Augmentation schemes under the category of New Schemes and details of transformers which will be replaced and where the replaced transformer will be utilized. RVPN in its data gap reply dated 10.02.2025 submitted the details of transformer diversions/ reshuffling with the copy of approvals.

3.95 RVPN is directed to henceforth submit the Augmentation schemes under the category of New Schemes along with the detailed project report of each schemes having cost more than Rs. 5 Crore. RVPN is also directed to henceforth submit the details of transformers which will be replaced and where the replaced transformer will be utilized alongwith the petition.

3.96 The Commission, has allowed the capital expenditure of Rs. 600 Crore as proposed by the Petitioner for FY 2025-26 under the category of Augmentation schemes.

3.97 RVPN is directed to ensure Techno-economical feasibility evaluation before taking up any new project and shall make a detailed project report for each new project. Before coming to this Commission for approval of any investment in a project of Prasaran Nigam; every project's DPR should be approved by BoD/WTB, this work culture has to be developed.

#### **H. Automation/ SCADA System**

##### **Petitioner's Submission**

3.98 The Petitioner has claimed expenditure of Rs. 45 Cr. towards Automation/ SCADA system.

##### **Commission's Analysis**

3.99 It is observed that Commission vide its order dated 26.07.2024, directed RVPN/SLDC to file a separate petition of Investment Plan for SLDC function. However, SLDC has not filed separate petition of Investment Plan for SLDC function. SLDC is again directed to file separate petition of Investment Plan for SLDC function henceforth, otherwise Commission will not consider the proposal of Investment Plan for SLDC function.

3.100 The Commission has allowed the capital expenditure of Rs. 45 Crore as proposed by the Petitioner for FY 2025-26 under the category of Automation/SCADA solutions.

#### **I. SAP- ERP & IT infrastructure Ongoing Schemes**

3.101 The Petitioner has claimed expenditure of Rs. 27.35 Crore towards development of SAP-ERP & IT Infrastructure .

### **Commission's Analysis**

3.102 The Commission has allowed the capital expenditure of Rs. 27.35 Crore as proposed by the Petitioner for FY 2025-26 under the category of SAP-ERP & IT Infrastructure Ongoing Schemes.

### **J. SAP- ERP & IT infrastructure New Schemes**

3.103 The Petitioner has claimed expenditure of Rs. 25 Crore towards development of SAP-ERP & IT Infrastructure new schemes.

### **Commission's Analysis**

3.104 We observe that under the category "SAP, ERP & IT infrastructure the Petitioner has proposed Investment of Rs. 25 Cr. for Scheme of "Asset Mapping of EHV Transmission line/ Towers using high resolution stereo satellite Imageries and creation of web Enabled GIS Based software Application and patrolling of EHV lines / Towers with use of Drones at regular interval with AMC period of 5 Years". Commission vide data gap dated 08.01.2025 sought the DPR of the above scheme.

3.105 RVPN in its data gap reply dated 10.02.2025 submitted the DPR for the above scheme. From the above DPR, out of Rs. 93 crore, RVPN has claimed Rs. 3.64 crore (including 18 % tax) for "Annual Maintenance Contract and hand holding for 05 years". The Commission is of the view that the above Annual Maintenance should not be part of capital expenditure and it should not be claimed as capitalized while truing up. Therefore, Commission directs RVPN to henceforth revise the estimated cost of above scheme from Rs. 93 crore to Rs. 89.36 crore.

3.106 The Commission has allowed the capital expenditure of Rs. 25 Crore as proposed by the Petitioner for FY 2025-26 under the category of SAP-ERP & IT Infrastructure new scheme.



## **K. Actual investment**

3.107 The Commission has also analysed the actual investments made by the Petitioner vis-à-vis plan approved for last 5 years as under:

**Table 5: Approved and Actual investment for last 5 years (Rs. Crore)**

<b>Financial Year</b>	<b>20-21</b>	<b>21-22</b>	<b>22-23</b>	<b>23-24</b>	<b>24-25*</b>
<b>Approved</b>	1547	856	1148	2022	2986.26
<b>Actual</b>	728	418	1011	1234	1803.97

\*Upto February 2025

3.108 The average actual investment during last 5 years (FY 2020-21 to FY 2024-25) is around Rs. 1038.99 Crore. We observe that the proposed investment is more than five times of the average actual investment made.

3.109 RVPN is directed to propose the next Investment Plan looking to their capacity of Investment and should be proposed after assessing their capability to implement the Investment Plan.

## **L. Tentative sources of funding**

3.110 Petitioner under the tentative resource of finance has mentioned the State Government equity of Rs. 1210 Crore. Commission in its data gap dated 08.01.2025 sought the approval of equity from Government of Rajasthan. RVPN in its reply submitted that the approval/ sanction of GoR shall be submitted to the Commission as will be approved from GoR. Later, RVPN in its reply on 28.04.2025 submitted that the GoR has approved the equity of Rs. 402.53 crore against proposed equity of Rs. 1210 crore in its Budget announcement on dated 19.02.2025.

3.111 The details of tentative resources for financing the above investment during FY 2025-26 of Rs. 6050.00 Crore is as shown in the table below:

**Table 6: Tentative sources of funding (Rs. Crore)**

Sr. No.	Particulars	Revised Amount
1	State Govt. Equity (@20% of Plan Ceiling)	402.53
2	Grant from PSDF	75
3	Loan from kfW	68
4	Bonds/ REC/ PFC/ NABARD/ NCRPB/ HUDCO/ Commercial Banks etc.	5504.46
	<b>Total</b>	<b>6050</b>

3.112 From above it is observed that the State Government has not allowed the equity as proposed by the petitioner and reduced the equity contribution from Rs. 1210 Crore to Rs. 402.53 Crore.

**M. Approved investment plan**

3.113 In light of the above analysis, the Commission has approved investment plan for FY 2025-26 as shown in the table below:

**Table 7: Approved investment plan for FY 2025-26 (Rs. Crore)**

	Particulars	Revised Petitioner's Claim (Rs. Crore)	Approved
1	<b>Ongoing Schemes</b>	3665.53	3665.53
2	<b>New Schemes</b>		
(i)	<b>Schemes having project cost above Rs. 300 Cr.</b>	1003.60	81.60
(ii)	<b>Schemes having project cost below Rs. 300 Cr.</b>	495.70	470.70
3.	<b>Carried Over Liabilities</b>	1.50	1.50
4.	<b>PSDF Funded Ongoing Schemes</b>	108.32	108.32

5.	<b>PSDF Funded New Schemes</b> (Establishment of security operation center at Rajasthan SLDC)	8	-
6.	<b>Capacitor Banks</b>	18	18
7.	<b>STOMS Extension</b>	5	5
8.	<b>Procurement of Distance Protection Relays (242Nos.), Differential Protection Relays (424Nos.), Over Current &amp; Eearth fault Relays, ToD meters at various GSSs. (Departmental)</b>	12	-
9.	<b>Work of Installation ,Integration &amp; Mainteance of 133 Nos RTUs including replacement of old and obsolete RTUs and considering requirment at new substation and future provision</b>	25	25
10.	<b>Upgradation of existing SAS system ( Software and Hardware)</b>	10	-
11.	<b>Augmentation (EAP &amp; Plan)/ (Up gradation)</b>	600	600
12.	<b>Automation/ SCADA System</b>	45	45
13.	<b>SAP-ERP &amp; IT System Ongoing Scheme</b>	27.35	27.35
14.	<b>SAP-ERP &amp; IT System New scheme</b>	25	25
15.	<b>Total</b>	<b>6050</b>	<b>5073</b>

3.114 Accordingly, as against a total proposed Investment Plan of Rs. 6050 Crore by the Petitioner, the Commission has approved an amount of Rs. 5073 Crore for Investment Plan of FY 2025-26. The Commission further directs that in case the actual/ tentative investment under any of the broad headings is likely to exceed the approved limits, the same may

immediately be brought to the notice of the Commission with necessary information and justifications for prior approval. The Commission may consider approval of such additional investment based on the merits of the case, after prudence check.

3.115 Copy of this order may be sent to the Petitioner, Respondents, Objectors, CEA and Government of Rajasthan.

(Hemant Kumar Jain)  
Member

(Dr. Rajesh Sharma)  
Chairman