ETPK/KSERC/2020-21/1123

18/12/2020

The Secretary,
Kerala State Electricity Regulatory Commission,
CV Raman Pillai Road, Vellayambalam,
Thiruvananthapuram – 695 035

Sir,


Ref: 1. Daily Order on the hearing dated 11-11-2020
2. Technopark Letter No. ETPK/KSERC/2020-21/1015 dated 20-11-2020

Further to Technopark’s submission referred above, the following points are submitted before the Hon’ble Commission for consideration in respect of the capital addition made during FY 2018-19 given under Article No 4 of the submission. The explanation of each item in the table is given below:

**Item No 1:** The approval for the capital Expense in respect of the 11 KV distribution system south side Phase III, was given vide order OP 12/2017 dated 13-11-2019. In the order Hon’ble Commission had taken the entire investment as Government grant. It may kindly be noted that in Technopark submission made then, we had stated that the grant was expected from the Government, but was not confirmed. However, during the release of Grant for FY 2018-19, the Government has released only Rs. 21.91 Lakhs for this work and the balance Rs 5.91 Lakhs was met from own fund. This has been shown in the table under Item-4 in the above submission. Hon’ble Commission may consider this matter and approve the investment from own fund.

**Item No 2:** A new distribution office was opened in Technopark Phase III building to accommodate operation and maintenance staff for the new phase. The building is about 2.5 km away from the Park Centre and it was necessary to open an office in the building to provide service in time. An amount of Rs 82,026/- was spent for the electrical cabling works of the room adjacent to the substation. Advance approval was not taken for since the value of this work was less than Rs 5 Lakhs. Hon’ble Commission may allow this capital expenditure.

**Item No 3:** An amount of Rs 3.89 Lakhs was spent for providing emergency lighting in the substation in Phase III. Emergency lighting is very necessary to operate the station when there is supply failure. Hon’ble Commission may kindly allow this expenditure.
**Item No 4:** The building named Yamuna is an 11 level multi-storied building. Each floor of the building was proposed originally to be leased to one or two customers requiring large floor area. The electrical distribution system was thus designed to provide supply to one or two customers only. However, there was not much requirement for large floor spaces and therefore some of the floors were divided to accommodate multiple customer companies requiring lesser floor space in one floor. Thus, additional electrical panels had to be installed to provide supply to more customers. There are now 254 Customers in the building. This is an essential requirement to provide supply to these consumers. The additional capital expense was Rs 6.82 Lakhs. Hon’ble Commission may kindly appreciate the essentiality of the expenditure necessitated by change in the business environmental and approve the expenditure.

**Item No 5:** Another item of expenditure of Rs 2.81 lakhs related to the statutory fee charged inspection and approval of the electrical installation by the Electrical inspectorate before initial energization of the network area. This amount was paid earlier and was accounted under Work in Progress and now been capitalized along with other items. It is appealed that Hon’ble Commission may approve this essential capital expenditure levied by statutory body.

**Item No 6:** The main capital investment made in the year was Rs 1.6 Cr related to installation of the distribution network in the Building. Technopark has submitted a separate petition (OA 16/2020) seeking approval of capital expenditure for projects, during FY 2012 to FY 2017 on which Hon’ble Commission had released the order on 04-09-2020. Technopark had sought approval of the capital expense of Rs. 5.23 Cr towards the Low-Tension electrical distribution system for supply of power up to the consumer meter point within the building. However, Hon commission did not approve the expense by relying to the regulation 49 of the supply code 2014. Technopark had submitted a review petition in this order on 03-11-2020 which is presently under the consideration of the Hon’ble Commission.

In this regard, Hon’ble Commission may please note that the Tariff Regulation of 2014 was formulated and published on 14-11-2014. The proposal for the Phase III expansion was finalized before the promulgation of the said regulation in 01-04-2009. The work for the electrical works was released on 09-06-2010. Therefore, it is appealed that the clause of a regulation may not be applied with retrospective effect. In the petition seeking review of the said order, Technopark has submitted for the consideration of the Hon’ble Commission.

**Item No 7:** Some of the 11 kV Cables on the south side of Phase III had to be rerouted through new trench to provide supply to the project area though a Ring Main Unit (RMU). An amount of Rs. 17.24 Lakhs had been spent for this purpose. Advance approval was not obtained as this additional work not originally envisaged and found necessary during the Project execution time. Hon’ble Commission may kindly approve this expenditure.

**Item No 8:** Similarly, an 11 kV Air-Break Switch was purchased and installed and HT Meters at a cost of Rs. 1.64 Lakhs in the year. These equipment were purchased to replace damaged meters and as for spares for future use. Advance approval was not obtained since these equipment were purchased to meet contingent situations and the amount was below the stipulated Rs 5 Lakhs. Hon’ble Commission may kindly allow this small capital expense.
**Item No 9:** Works for an amount of **Rs 4.95 Lakhs** was carried out in the 160 KVA, 11 kV substation (which was earlier used to take temporary supply for construction purpose to Phase III) for utilizing it for providing permanent connection to prospective consumers and stabilize supply to pump house and sewage treatment plant. Hon’ble Commission may kindly approve this capital expenditure being essential and utilization of a temporary facility for permanent purpose.

**Items No 10, 11 & 12:** These items are related to the capital investment made for installing Roof-top Solar plants of capacity 200 kWp, 25 kWp and 10 kWp in the Technopark Campus. Approval has already been given by the Hon Commission in respect of these plants wide order on OP No.16 2020 and OA No. 25/2020 dated 04-09-2020 and 24-03-2020 respectively.

It is earnestly appealed that the Hon’ble Commission may approve the Capital Investment for the Financial Year 2018-19 after considering the above submission.

Thanking you,

Yours Faithfully
For **Electronics and Technology Parks – Kerala**

Madhavan Praveen
Dy. General Manager (Projects)