

## **CHAPTER – 6**

### **NEW PROPOSALS**

#### **I. Proposed Incentive Scheme to HT industrial consumers during monsoon period:**

##### **1. Preamble:**

The State is having surplus power during monsoon period due to penetration of more Renewable Energy into the Grid. The RE power has must run stature & doesn't come under Merit order dispatch. To off-take the RE Power, the thermal stations having higher variable cost is backed down & kept under Reserve Shut Down(RSD). Due to fourth & fifth amendments to CERC Deviation Settlement Regulations, more discipline in the Grid is to be ensured and if not adhered to the additional charges & penalties are to be paid due to sign change & under draws.

Hitherto surplus power was traded in Indian Energy Exchange (IEX). Due to depletion of rates in IEX, the quantum put to bid is not cleared and revenue from sale of power in IEX is minimum.

To avoid the additional charges & penalties for DSM & quoting the surplus quantum at cheaper rate in IEX, BESCOM is proposing an incentive scheme for HT Sales for the monsoon period from July-2020 to Sep-2020.

##### **2. Background:-**

BESCOM has a HT Consumer base of around 16,322 installations. Though these consumers account for 0.14% of total active Consumer base of about 118 lakhs, the revenue contributed by these HT Consumers amounts to 39% of total revenue of BESCOM. Hence, though they are small in number, they are the most valued consumers of BESCOM.

About 30% of consumption is from HT category. The HT category is high paying and cross subsidizing category. The trend in HT industrial and commercial sales across BESCOM over 10 Financial Years is shown in the table below.

HT 2a, 2b and 2c sales trend		
Year	Sales in MU	Growth Compared to previous year in MU
FY-10	5677.38	
FY-11	6295.41	618.03
FY-12	7010.50	715.08
FY-13	7693.43	682.94
FY-14	8014.52	321.09
FY-15	7735.34	-279.18
FY-16	7440.66	-294.68
FY-17	7345.85	-94.8
FY-18	7345.30	-0.5
FY-19	7282.82	-62.5

From the above table, it can be seen that there is a downward trend in HT sales consistently under achieving KERC targets. There is a phenomenal decrease in HT sales growth from FY15 onwards. The decrease in growth in sales has clearly affected BESCOM adversely as they are high paying and cross subsidizing category.

### 3. Reasons attributable for downward trend in HT sales:

There is continuous upward movement in off-grid consumption during the last 4 Financial Years. The trend is shown in the table below.

Year	Captive		Wheeling (Non captive)		OPEN ACCESSS		Total	
	No of consumer	Consumption in mu	No of consumer	Consumption in mu	No of consumer	Consumption in mu	No of consumer	Consumption in mu
FY-16	140	63.06	336	1264.29	72	478.73	548	1806.07
FY-17	231	441.19	322	1373.56	149	1189.72	702	3004.47
FY-18	231	1020.97	400	1294.73	163	1238.33	794	3554.04
FY-19	182	1040.22	444	2752.12	96	468.35	722	4260.69

As can be seen from the table, BESCOM has lost 3004.47 MU of sales in FY 17 and the same is 3554.04 MU for FY 18 and has increased to 4260.69 MU during FY19. With the HT category ARR of Rs 9.15 for FY19, the probable loss in revenue would approximately Rs 2947 Crs. (excluding captive consumption) for BESCOM for FY19. As price is the major criteria, BESCOM Consumers are opting for Open

Access/Wheeling, where they get power at a lower rate. The Renewable Purchase Obligation (RPO) which mandates procurement of a specific percentage of the total energy requirement from renewable sources is also one of the reasons for Consumers opting out of BESCOM grid. The RE generators sell power produced at lower rates.

The other reasons that could be attributed for downward trend in HT sales are as listed below.

- a. Consistent increase in approved HT Tariff. In the last five years energy charge has gone by 150 paise/kWh (Energy charges are steeply increasing, whereas Demand charge has hardly gone up. As a result, fixed charge recovery has come down and energy charges are realized less on account of consumers moving away from the grid.)
- b. Waiver of wheeling charges for Solar energy.
- c. Capturing of BESCOM HT consumers by NCE generators located in the jurisdictions of other ESCOMs.
- d. NCE generators could be absorbing the additional Cross subsidy surcharge levied to the consumers who are participating in wheeling transaction and offering a price at a lower rate than the BESCOM tariff.
- e. Would enable them to buy Green power (at a cheaper rate than the rate offered by discoms) – Green power tariff of KERC is 50 paise more than the normal tariff, which has to be met out of the renewable energy procured by discoms over and above their RPO.

#### **4. Impact of downward trend in HT sales on BESCOM:**

As the collection efficiency in HT category is almost 100%, the reduction in sales has resulted in reduction of profitable consumption.

Reduces profitable consumption

- Technical loss cross subsidization ( as HT consumption decreases, technical loss will go up and affect the overall loss levels)

- Monetary cross subsidization (Higher HT sales would have given the required cross subsidization to BESCOM. But with less sales, it will affect the financials and increase the gap)

The other impacts are as listed below-

- Increases working capital requirements (collection from HT is 100%) and non-profitable sales.
- Imposes higher subsidy burden on State as the cross subsidy that was coming from HT will come down from reduction in HT sales.

## **5. Consumers who have opted OA/Wheeling:**

540 Number of Consumers have opted for OA/Wheeling. 80% of these come from Bangalore Metropolitan Area Zone. HT2(a) and HT2(b) consumers have largely moved out of BESCOM grid. These comprise of major industries and IT enabled service firms.

## **6. Corrective action initiated by BESCOM**

- i. Considering the seriousness of the issue, BESCOM initiated action to interact with HT industrial Consumers and to ascertain the reasons for their moving away from the grid. While appreciating this move, as one of the rare initiatives to encourage the HT industrial consumption, several consumers expressed that they are willing to come back to BESCOM if:-
  - a) They are offered price/unit at a competitive rate.
  - b) BESCOM can issue certificates/letters for the incremental energy drawn by them as sourced from NCE to meet their RPO obligations
  - c) Certainty of tariff rate is assured for a fixed period i.e monsoon period.
- ii. BESCOM has prepared a financial model soft copy of the financials worked out will be submitted to Hon'ble Commission. As per the exercise, we have proposed to extend the incentive at 40-90 paise/kwh for 11 kV consumers and an incentive 60-100 paise/kwh for 66kV & above consumers. We have further examined, the possible sales growth (incremental energy consumption) at 20%. BESCOM is targeting IEX consumers and open access consumers.

- iii. The Realization pre and post introduction of the incentive scheme has also been worked and shown in the financial model.

### **Introduction of HT Incentive Scheme during monsoon period:**

BESCOM proposes Incentive Scheme for HT Industrial Consumers whose consumption exceeds 1 lakh and above consumption. Additionally, actual consumption in a month for the current quarter 2 of FY21 (Jul, Aug, Sep 2020) shall be 20% more than the average consumption of quarter 1 of FY21 (Apr, May, Jun 2020).

The discount rate will be less than the landed cost charged by IEX and wheeling and Banking Generators for non –solar, non-captive use, as one of its efforts to bring back HT Consumers to its grid during monsoon period. It will be a win –win situation for both BESCOM and the HT Consumers.

It was proposed that BESCOM may offer a rate inclusive of highest Average Variable Cost and O&M cost and Margin to HT Consumers during Monsoon period. The Highest Variable cost is Rs 3.85 per unit plus losses, O&M Cost is Rs 1.50 per unit and margin in the range 60-90 ps/unit for all consumers.

This scheme is applicable on Monsoon Period covering Jul 2020, Aug 2020 and Sep 2020 i.e Quarter 2 of FY-21.

BESCOM through this incentive scheme is attempting to generate additional revenue from HT consumers by encouraging them to consume 20% more than the average consumption of quarter 1 of FY-21 (Apr, May, Jun 2020) by offering a concessional tariff rate. In case the consumers get attracted to this scheme, HT sales will go up, which in-turn would help BESCOM to come closer to achieving the HT sales target approved by the Commission during FY-21. This will have a positive impact on the cross subsidy generation also, which in-turn could reduce the subsidy burden on State Government for the respective year/s.

#### **a. Categories proposed for the scheme**

Based on sales trend, ARR and present tariff rate, the following HT categories are proposed to be included in the scheme.

- i. HT2(a)i – Industrial Category in BBMP area.
- ii. HT2(a)ii- Industrial Category Non- BBMP area.

**b. How the scheme works (How Consumers and BESCOM are benefited from the scheme).**

An incentive rate i.e., price/kwh is arrived at, for HT Industrial Consumers consuming whose consumption exceeds 1 lakh and above consumption. Additionally, actual consumption in a month for the current quarter 2 of FY21 (Jul, Aug, Sep 2020) shall be 20% more than the average consumption of quarter 1 of FY21 (Apr, May, Jun 2020). BESCOM under this scheme is proposing to offer a reduction in both the slab rate of respective category for consumption. The table below shows the comparative rates.

Tariff category	Tariff description	Slab	Actual Sales (Mus) FY 21	Revenue as per appd. Tariff Rs. Crs. For 3 months	Revenue as per discount Tariff Rs. Crs.	Difference in Revenue in approved and Discounted tariff Rs. Crs.	Increase in sales at 20% per month on actual sales in MU	Revenue per month as per discount tariff for incremental sales Rs. Crs.
HT 2a(i)	Indl. BBMP area (11kV)	First 1 lakh units	2340.8	83.1	76.1	7.0	7.8	5.07
		Balance units		177.6	156.0	21.6	16.0	10.40
	Indl. BBMP area(66kv & above)	First 1 lakh units		12.5	11.4	1.1	1.2	0.76
		Balance units		155.9	136.9	19.0	14.0	9.13
HT 2a(ii)	Other than HT 2(a)I (11kV)	First 1 lakh units	1818.3	117.7	107.6	10.1	11.2	7.18
		Balance units		153.8	134.6	19.2	14.2	8.97
	Other than HT 2(a)(i)- (66kv & above)	First 1 lakh units		3.2	2.9	0.27	0.3	0.19
		Balance units		49.1	43.0	6.14	4.5	2.86
<b>Total of HT2a</b>			<b>4159.14</b>	<b>700.6</b>	<b>622.6</b>	<b>78.0</b>	<b>64.5</b>	<b>41.5</b>

Tariff category	Tariff description	Slab	Energy Charges rate (Rs./kwh)	Discount rate proposed (Rs./kwh)	Energy Charges (EC) rate after discount (Rs./kwh)
HT 2a(i)	Incl. BBMP area (11kV)	First 1 lakh units	7.1	0.60	6.50
		Balance units	7.4	0.90	6.50
	Incl. BBMP area(66kv & above)	First 1 lakh units	7.1	0.60	6.50
		Balance units	7.4	0.90	6.50
HT 2a(ii)	Other than HT 2(a)I (11kV)	First 1 lakh units	7.0	0.60	6.40
		Balance units	7.2	0.90	6.30
	Other than HT 2(a)(i)-(66kv & above)	First 1 lakh units	7.0	0.60	6.40
		Balance units	7.2	0.90	6.30

With these proposed incentive rates, the expected increase in sales and corresponding revenue is also worked out as shown in table below. The sales in these category increase from **20% per month**, which works out to around 193MU (20% increase considered) for 3 months, results in incremental revenue of Rs 4 Crores for 3 month.

### 7. Meeting the incremental Power Purchase requirement:

As BESCOM is expecting incremental sales after enforcement of this scheme, it should be ready to cater the additional demand. For catering this additional demand, BESCOM has to either buy extra power or manage with existing power by better load management. Buying of extra power is costlier affair and will nullify the benefits availed from the scheme. Hence BESCOM proposes to meet the incremental sales demand from HT consumers, after the introduction of the scheme, by better load management. KERC has approved 35373.98 MUs power procurement for the current financial year FY-21, BESCOM has modified the energy input to 35120.43MU for FY-21.

### 8. Impact of scheme on BESCOM's future tariff:

BESCOM through this incentive scheme, is attempting to generate additional revenue from HT consumers by encouraging them to consume over and above the average 3 months consumption by offering a concessional tariff rate. In case the consumers get attracted to this scheme, HT sales may go up, which would in-turn help BESCOM to

come closer to achieving the HT sales target approved by the Commission for the year. This will have a positive impact on the cross subsidy generation also, which in-turn could reduce the subsidy burden on State Government for the respective year/s.

As far as the MYT application for the next control period and the tariff application for the ensuing year is concerned, BESCOM would like to mention here that, it will have to take in to account the projected gap of the respective year/s in to account and propose for tariff increase/rationalization wherever necessary, as implementation of HT incentive scheme alone will not address all the financial issues of the Company. However, it is to be stated that if this scheme is well received by the consumers, it could mitigate BESCOM from one burning issue i.e. improving HT sales and revenue.

Hon'ble Commission is requested to consider and approve the above proposal so that BESCOM can implement the scheme from July 2020.

#### **9. Terms and Conditions for HT Incentive Scheme during monsoon period :**

- This scheme will be applicable only when SLDC confirms that there is surplus power situation during monsoon period
- HT consumers availing this scheme are not eligible for open access
- HT consumers can avail any one of the incentive schemes.
- ToD tariff will not be applicable for the monsoon period incentive scheme.

#### **II. Separate HT tariff for 1 MW and above consumers**

The Electricity Act 2003 envisaged competition in retail supply of electricity by introducing the concept of 'Open access' in phased manner. As per the definition of the 'Open Access' means the non-discriminatory provisions for use of transmission line or distribution system or associated facilities with such line or system any licensee or consumer or a person engaged in generation in accordance with the regulations specified by the Appropriate Commission.

Subsequently the State Commission notified Open Access Regulations which facilitated procurement of power through the Open Access route.



The introduction has been largely successful in promoting competition with the distribution licensees by providing consumers access to alternate sources of power. However, a number of issues have come up in the operationalization of Open Access impacting Distribution Licensee and non-open access retail supply consumers of distribution licenses.

### **Issues:**

- 1. Frequent shifting of Open Access Consumers:** BESCOM unable to manage power procurement efficiently due to frequency of shifting of Open access consumers between BESCOM and other source of power.
- 2. Cross Subsidy Surcharge:** Cross subsidy surcharged calculated by the State Commission and its recovery is insufficient to recover the entire loss of cross subsidy on account of consumers procuring power through the Open Access route.
- 3. Group captive consumers:** The number of HT consumers under group captive has increased over the years. The consumers of group captive power scheme are exempted from paying cross subsidy surcharges and additional surcharge. The actual consumption by each of the captive user is only calculated at the end of the year. Even if the captive user does not comply with the conditions of group captive he enjoys the benefit till the end of year. This results in financial loss to the Company.

Although two part tariff has been introduced, the structuring of fixed and variable components of tariff is not reflective of the actual proportion of fixed and variable cost liability of BESCOM.

- ✚ Revenue expenditure can be divided into two parts
  - Fixed expenditure contributing 46% of the total cost and
  - Variable expenditure contributing 54% of the total cost.

**Breakup of Fixed and variable charges approved and actual as per accounts for FY-19 is tabulated below:**

Particulars	Approved			Actual		
	Fixed	Variable	Total	Fixed	Variable	Total
Generation	3046.25	10651.05	13697.3	4015.12	11893.18	15908.3
Transmission	2303.47		2303.47	2806.31		2806.31
Distribution	3235.39		3235.39	3422.46		3422.46
Total	8585.11	10651.05	19236.16	10243.9	11893.2	22137.1
Sales in Mu			28286.75			27762
<b>Composition per unit cost Rs./unit</b>	<b>3.04</b>	<b>3.77</b>	<b>6.80</b>	<b>3.69</b>	<b>4.28</b>	<b>7.97</b>
	<b>45%</b>	<b>55%</b>	<b>100%</b>	<b>46%</b>	<b>54%</b>	<b>100%</b>

- ✚ On the contrary under Revenue earned from tariff 1. Fixed cost collected is at the rate of 19% and 2. Variable cost collected is at the rate of 81% of the total receipt.

**Breakup of fixed/demand charges and Energy charges received for FY-19 is tabulated below:**

Particulars	FY-19		
	Fixed/ Demand charges	Energy charges	Total
LT-Consumers	2260.5	9042.166	11302.71
HT-Consumers	1976.4	5343.593	7319.99
Misc.		916.05	916.05
<b>Total</b>	<b>4237</b>	<b>15301.81</b>	<b>19538.75</b>
	22%	78%	100%

- In majority of categories recovery of variable charges are not even at the Commission determined first slab rate. This may be due to inbuilt rebate such as voltage class rebate and incentive for Time of the Day tariff.
- Since the contribution of fixed charges is only 22% of the average realization rate the balance i.e. 24% (46%-22%) is concealed in the energy charges. Hence, the energy charge seems to be on a higher side. This is foremost reason for tapping HT consumers by generators. If the Demand/Fixed charges which is masked in the

energy charges are separated then the variable cost can be reduced. Hence, it is proposed for increasing the fixed charges for HT consumers.

- Change in the approved sales mix also affects the cross subsidy level.
- If there is any reduction in sales under HT tariff, loss on account of fixed charges is at the larger extent i.e., -24%, and this will further worsen the cross subsidy level.
- Tariff determination does not consider the inbuilt rebate.

In order to reflect the actual share of fixed cost in the revenue requirement of Distribution licensees, there is need to enhance recovery through fixed charges. The fixed charge shall be so set that it leads to recovery of 100% of the fixed costs of Distribution Licensees.

The above concern of BESCOM is also highlighted in the recently issued Draft Amendments to Tariff Policy, 2018, which reads as below:

*“In order to reflect the actual share of fixed cost in the revenue requirement of Distribution licensees, there is need to enhance recovery through fixed charges. The fixed charge shall be so set that it leads to recovery of at least 50% of the fixed costs in case of Domestic and Agriculture categories and at least 75% recovery of fixed costs in case of other categories progressively over next three years. The SERCs and JERCs shall lay down a roadmap to achieve the same.”*

Since the fixed charges are inadequate, BESCOM has to borrow some amount to meet its working capital requirements to discharge its fixed liabilities. Increasing tariff by increasing energy charges instead of fixed / demand charges would result into steep fluctuations in revenue with varying consumption over time. It would also affect BESCOM ability to meet the fixed charges obligation.

**Calculations are as under: Proposed Demand charges per KVA per month.**

**Existing based on FY-19:**

Tariff	No. of Consumers	Load in KVA	Consumption in MU	Rate	Demand charges	Energy Charges	Total	ARR
HT1	248	298203	726.15	210/KVA	63.88	339.59	403.47	5.56
HT2A	7059	4708353	4512.96	220/KVA	1008.53	2782.40	3790.93	8.40
HT2B	6787	3081298	2448.41	240/KVA	660.01	2014.33	2674.35	10.92
HT2C	758	280460	321.45	210/kVA	60.07	217.32	277.39	8.63
HT3	52	68068	45.67			13.93	13.93	3.05
HT4	252	44604	70.04	130/KVA	9.55	39.59	49.14	7.02
HT5	1180	57820	85.87	260/HP	12.39	98.39	110.78	12.90
<b>Total</b>	<b>16336</b>	<b>8538806</b>	<b>8211</b>		<b>1814</b>	<b>5506</b>	<b>7320.0</b>	
% of Recovery of Fixed and Energy components					25%	75%	100%	

**Tabulation of expected proposition of fixed charges (46%) and Energy charges (54%) as per actual expenditure incurred:**

Tariff	No. of Consumers	Load in KVA	Consumption in MU	Demand charges	Energy Charges	Total	ARR	Per kVA	per unit
HT1	248	298203	726.15	185.60	217.87	403.47	5.56	610.18	3.00
HT2A	7059	4708353	4512.96	1743.83	2047.10	3790.93	8.40	363.11	4.54
HT2B	6787	3081298	2448.41	1230.2	1444.15	2674.35	10.92	391.42	5.90
HT2C	758	280460	321.45	127.60	149.79	277.39	8.63	446.04	4.66
HT3	52	68068	45.67	6.41	7.52	13.93	3.05	92.32	1.65
HT4	252	44604	70.04	22.60	26.54	49.14	7.02	496.84	3.79
HT5	1180	57820	85.87	50.96	59.82	110.78	12.90	984.50	6.97
<b>Total</b>	<b>16336</b>	<b>8538806</b>	<b>8211</b>	<b>3367</b>	<b>3953</b>	<b>7320.0</b>			
% of Recovery of Fixed and Energy components				46%	54%	100%			

Hence, it is proposed to revise the demand charges for the consumers of 1 MW and above consumers to avoid the loss of fixed charges, if the consumers opt for open access.

Tariff	No. of Consumers	Load in KVA	Consumption in MU	Demand charges	Energy Charges	Total	ARR	Proposed	
								Per KVA	Per unit
HT2A	7059	4708353	4513	1744	2047	3791	8	363	4.54
HT2B	6787	3081298	2448	1230	1444	2674	11	391	5.90
HT2C	758	280460	321	128	150	277	9	446	4.66

Commission requested to increase the demand charges at least for the consumers of 1 MW and above. This will not only helping BESCOM to charge reflective proportion of fixed cost but also helps in developing the competence to participate in the open market to catch the consumers.

The following table compares Demand Charges for HT Industrial category consumers among some of the States. BESCOM submits that the fixed charges in the neighboring states are relatively higher than those approved for BESCOM. Such charges eventually lead to appropriate fixed charge recovery for these States.

### **Madhya Pradesh:**

Sub-Category of consumer	Monthly Fixed Charge (Rs./kVA of billing demand per month)	Energy Charge for consumption up to 50% load factor (paise/ unit)	Energy Charge for consumption in excess of 50% load factor (paise /unit)
<b>Industrial</b>			
11 kV supply	340	700	600
33 kV supply	560	690	590
132 kV supply	650	650	550
<b>Non-Industrial</b>			
11 kV supply	320	730	640
33 kV supply	460	710	620
132 kV supply	550	670	560
<b>Shopping malls</b>			
11 kV supply	330	710	635
33 kV supply	380	700	600
132 kV supply	510	650	580
<b>Power intensive industries</b>			
33 kV supply	560	530	530
132 kV supply	660	510	510

**Tamil Nadu:**

<b>HT INDUSTRIES(HT-1A)</b>		<b>Rs./kVA</b>
Fixed charges		350/kva/month
Energy charges		6.35
<b>Railway traction</b>		
Fixed charges		300/kva/month
Energy charges		6.35
<b>Govt. Educational institution</b>		
Fixed charges		350/kva/month
Energy charges		6.35
<b>Pvt. Educational institution</b>		
Fixed charges		350/kva/month
Energy charges		6.35
<b>HT commercial</b>		
Fixed charges		350/kva/month
Energy charges		8.00

**Andhra Pradesh:**

<b>HT-I(A): General</b>		<b>Fixed/Demand Charges in/ Month</b>	<b>Energy Charges /Unit</b>
132 KV and above	kVAh	475	5.44
33 KV	kVAh	475	5.87
11 KV	kVAh	475	6.33

**Kerala:**

<b>HT-1(A)-Industries</b>	
Demand Charges	340
Energy Charges	5.75

**Telangana:**

<b>HT-I(A): Industries</b>		<b>Fixed/Demand Charges in/ Month</b>	<b>Energy Charges /Unit</b>
132 KV and above	kVAh	390	5.65
33 KV	kVAh	390	6.15
11 KV	kVAh	390	6.65

## Maharashtra (Mahadiscom)

### HT industrial

Consumer Category	Demand Charge (Rs/ kVA/ month)	Energy Charge (Rs/kWh)
HT I: HT – Industry		
HT I (A): Industry - General	391	7.07
HT I (B): Industry - Seasonal	391	7.34

### HT Commercial

Consumer Category	Demand Charge (Rs/ kVA/ month)	Energy Charge (Rs/kWh)
All Units	391	11.73

BESCOM has proposed increase in Demand Charges and uniform tariff rates for all units Consumed.

### III. Continuation of Special Incentive Scheme:

The Hon'ble Commission in its Tariff Order 2019, dtd 30.05.2019 had decided to continue the HT incentive scheme for FY-20 in an attempt to bring back the EHT/HT consumers who are availing power through open access.

In the said incentive scheme, rebate of Rs.1/unit for the consumption over and above the base consumption during 10:00 hrs to 18:00 hrs and rebate of Rs.2/unit during 22:00 hrs to 06:00 hrs is extended. Further, during 10:00 hrs to 18:00 hrs if the SIS consumer's consumption during 10:00 hrs to 18:00 hrs does not exceed the base consumption, still rebate of Rs.2/unit is extended during 22:00 hrs to 06:00 hrs.

At the end of October 2019, **101** HT/EHT Consumer have opted for Special Incentive Scheme, out of which more than 35 installations have not reached the base consumption but still BESCOM is extending rebate of Rs.2/unit. **The key point for allotting Special Incentive Scheme is to increase the metered sales of BESCOM at the cost of giving incentive to EHT/HT consumers.** Since, the metered sales during 10:00 hrs to 18:00 hrs does not increase and rebate is extended during 22:00 hrs to 06:00 hrs, the Average Revenue Realization of such installations under SIS has reduced. The installation wise details are shown in below table. Hence, the

Commission is requested to consider fixing base consumption for night consumption also.

It is learnt that HT incentive would only benefit a small percentage of industries who operate three shifts. Few industries that have a third shift usually use it for maintenance. This is one of the reasons for HT industries not opting for Special Incentive Scheme. **If the base consumption is fixed for the overall consumption (average of 12 months) instead during 10:00 hrs to 18:00 hrs and rebate of Re.1/unit is extended for all the consumption over and above the base consumption, more HT consumers may opt for the HT incentive scheme.**

Further, the Hon'ble Commission decision in its Tariff Order 2019 notes that the consumer cannot be compelled to avail the scheme by barring OA facility to them. It is for BESCOM to make it scheme more attractive to such consumers. Hence, the incentive for the energy consumed from BESCOM, has to be extended under SIS for Open Access Consumers.

After extending the **special incentive scheme** from Tariff Order 2018, dated 14.05.2018, the HT2a, HT2b and HT2c sales have not improved as can be seen in the table below:

HT 2a,2b and 2c sales trend		
Year	Sales in MU	Growth Compared to previous year in MU
FY-10	5677.38	
FY-11	6295.41	618.03
FY-12	7010.50	715.08
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FY-14	8014.52	321.09
FY-15	7735.34	-279.18
FY-16	7440.66	-294.68
FY-17	7345.85	-94.8
FY-18	7345.30	-0.5
FY-19	7282.82	-62.5

It is apt to state here that the HT consumers are sourcing their energy from various sources for example: solar generators, wind generator, mini hydel generators, group captive and also from IEX. Each HT consumer procures energy from various sources



to reduce their energy charges. Such consumers fall back on BESCOM only for fulfillment of their balance energy. Further, these HT consumers have an agreement with the generators for a span of 5/10 years. If the Special Incentive Scheme becomes applicable to such HT consumers (open access) then the metered sales of BESCOM will not increase. BESCOM through this incentive scheme is attempting to generate additional revenue from HT consumers by encouraging them to consume over and above the average 12 months consumption by offering a concessional tariff rate. In case the consumers get attracted to this scheme, HT sales may go up, which would in-turn help BESCOM to come closer to achieving the HT sales target approved by the Commission. This will have a positive impact on the cross subsidy also, which in-turn could reduce the subsidy burden on State Government for the respective year/s. **Hence, BESCOM is restricting the HT incentive scheme to its embedded consumers only.**

**Table-A**

BESCOM has considered 71 installations for computing the financial impact of Special Incentive Scheme up to 30.10.2019, Details are shown in the below table:

R.R. No	Before SIS				After SIS				Base Consumption in MU
	Month	Total Consumption	Total Bill Amount in Rs.	ARR	Month	Total Consumption	Total Bill Amount in Rs.	ARR	
ESHT-25	Oct-17	688470	6856166	9.96	Sep-18	649080	6635417	10.22	240238.00
	Nov-17	722940	7166978	9.91	Oct-18	616035	6398972	10.39	
	Dec-17	684285	6835038	9.99	Nov-18	649875	6772319	10.42	
	Jan-18	631650	6293539	9.96	Dec-18	636720	6643815	10.43	
	Feb-18	631170	6281108	9.95	Jan-19	628950	6551033	10.42	
	Mar-18	580020	5793523	9.99	Feb-19	625155	6473873	10.36	
	Apr-18	672315	6573334	9.78	Mar-19	592695	6171668	10.41	
	May-18	658335	6456424	9.81	Apr-19	677835	7061992	10.42	
	Jun-18	644895	5962007	9.24	May-19	660045	6313008	9.56	
	Jul-18	634995	6423563	10.12	Jun-19	664440	5977238	9.00	
	Aug-18	649065	6559420	10.11	Jul-19	641850	6373032	9.93	
1SHT-2	Feb-18	84316	912968	10.83	Feb-19	87884	899721	10.24	40635.00
	Mar-18	78473	893740	11.39	Mar-19	81488	774126	9.50	
	Apr-18	105228	1002900	9.53	Apr-19	95872	956680	9.98	
	May-18	102876	973164	9.46	May-19	95836	952983	9.94	
	Jun-18	102806	997519	9.70	Jun-19	97936	995772	10.17	
	Jul-18	92760	888460	9.58	Jul-19	93372	966330	10.35	

<b>THT-19</b>	<b>Dec-17</b>	167935	1306543	<b>7.78</b>	<b>Oct-18</b>	161270	1239876	<b>7.69</b>	<b>51404.00</b>
	<b>Jan-18</b>	180600	1398510	<b>7.74</b>	<b>Nov-18</b>	166745	1330661	<b>7.98</b>	
	<b>Feb-18</b>	177480	1383001	<b>7.79</b>	<b>Dec-18</b>	174280	1384190	<b>7.94</b>	
	<b>Mar-18</b>	162460	1271520	<b>7.83</b>	<b>Jan-19</b>	183955	1449810	<b>7.88</b>	
	<b>Apr-18</b>	161895	1238182	<b>7.65</b>	<b>Feb-19</b>	160715	1279518	<b>7.96</b>	
	<b>May-18</b>	157110	1246469	<b>7.93</b>	<b>Mar-19</b>	160225	1277291	<b>7.97</b>	
	<b>Jun-18</b>	158155	1235564	<b>7.81</b>	<b>Apr-19</b>	174195	1389409	<b>7.98</b>	
	<b>Jul-18</b>	176230	1426825	<b>8.10</b>	<b>May-19</b>	142655	1149579	<b>8.06</b>	
	<b>Aug-18</b>	175925	1407070	<b>8.00</b>	<b>Jun-19</b>	171825	1416029	<b>8.24</b>	
	<b>Sep-18</b>	172235	1376374	<b>7.99</b>	<b>Jul-19</b>	147995	1242520	<b>8.40</b>	
<b>THT-34</b>	<b>Dec-17</b>	61818	492717	<b>7.97</b>	<b>Oct-18</b>	62064	513517	<b>8.27</b>	<b>20554.00</b>
	<b>Jan-18</b>	61386	490362	<b>7.99</b>	<b>Nov-18</b>	54417	455349	<b>8.37</b>	
	<b>Feb-18</b>	64695	514856	<b>7.96</b>	<b>Dec-18</b>	62778	514254	<b>8.19</b>	
	<b>Mar-18</b>	71139	562974	<b>7.91</b>	<b>Jan-19</b>	49452	413404	<b>8.36</b>	
	<b>Apr-18</b>	49095	395573	<b>8.06</b>	<b>Feb-19</b>	43509	373722	<b>8.59</b>	
	<b>May-18</b>	55437	456373	<b>8.23</b>	<b>Mar-19</b>	57465	477005	<b>8.30</b>	
	<b>Jun-18</b>	69681	551561	<b>7.92</b>	<b>Apr-19</b>	58377	484880	<b>8.31</b>	
	<b>Jul-18</b>	52599	455503	<b>8.66</b>	<b>May-19</b>	51111	431522	<b>8.44</b>	
	<b>Aug-18</b>	51927	433880	<b>8.36</b>	<b>Jun-19</b>	43527	389087	<b>8.94</b>	
<b>Sep-18</b>	58131	482873	<b>8.31</b>	<b>Jul-19</b>	45156	406214	<b>9.00</b>		
<b>THT-197</b>	<b>Dec-17</b>	85160	715408	<b>8.40</b>	<b>Oct-18</b>	89840	690372	<b>7.68</b>	<b>28182.00</b>
	<b>Jan-18</b>	117416	916748	<b>7.81</b>	<b>Nov-18</b>	108688	840026	<b>7.73</b>	
	<b>Feb-18</b>	95624	755979	<b>7.91</b>	<b>Dec-18</b>	103032	801146	<b>7.78</b>	
	<b>Mar-18</b>	36512	360139	<b>9.86</b>	<b>Jan-19</b>	123184	932919	<b>7.57</b>	
	<b>Apr-18</b>	64032	524069	<b>8.18</b>	<b>Feb-19</b>	100504	787001	<b>7.83</b>	
	<b>May-18</b>	122248	953468	<b>7.80</b>	<b>Mar-19</b>	86568	695489	<b>8.03</b>	
	<b>Jun-18</b>	275040	1005398	<b>3.66</b>	<b>Apr-19</b>	103248	810422	<b>7.85</b>	
	<b>Jul-18</b>	106512	879718	<b>8.26</b>	<b>May-19</b>	63716	483432	<b>7.59</b>	
	<b>Aug-18</b>	117144	925064	<b>7.90</b>	<b>Jun-19</b>	119224	948513	<b>7.96</b>	
<b>Sep-18</b>	85024	683051	<b>8.03</b>	<b>Jul-19</b>	264580	872275	<b>3.30</b>		
<b>THT-266</b>	<b>Dec-17</b>	139240	1142814	<b>8.21</b>	<b>Oct-18</b>	141848	1205919	<b>8.50</b>	<b>48872.00</b>
	<b>Jan-18</b>	138968	1143803	<b>8.23</b>	<b>Nov-18</b>	145488	1229858	<b>8.45</b>	
	<b>Feb-18</b>	148496	1211923	<b>8.16</b>	<b>Dec-18</b>	164752	1373329	<b>8.34</b>	
	<b>Mar-18</b>	142512	1170772	<b>8.22</b>	<b>Jan-19</b>	170360	1408279	<b>8.27</b>	
	<b>Apr-18</b>	144392	1161054	<b>8.04</b>	<b>Feb-19</b>	170456	1405764	<b>8.25</b>	
	<b>May-18</b>	143704	1156373	<b>8.05</b>	<b>Mar-19</b>	122720	1054152	<b>8.59</b>	
	<b>Jun-18</b>	142792	1177929	<b>8.25</b>	<b>Apr-19</b>	134624	1154863	<b>8.58</b>	
	<b>Jul-18</b>	147280	1264529	<b>8.59</b>	<b>May-19</b>	128208	1102379	<b>8.60</b>	
	<b>Aug-18</b>	138928	1173794	<b>8.45</b>	<b>Jun-19</b>	139200	1224762	<b>8.80</b>	
<b>Sep-18</b>	147496	1243514	<b>8.43</b>	<b>Jul-19</b>	125512	1131925	<b>9.02</b>		
<b>THT-</b>	<b>Dec-17</b>	137900	1103538	<b>8.00</b>	<b>Oct-18</b>	259600	1959537	<b>7.55</b>	<b>73158.00</b>

366	Jan-18	143550	1146108	7.98	Nov-18	245950	1857573	7.55	
	Feb-18	134650	1081080	8.03	Dec-18	257300	1942384	7.55	
	Mar-18	154600	1229396	7.95	Jan-19	292000	2161327	7.40	
	Apr-18	222200	1656409	7.45	Feb-19	277700	2051517	7.39	
	May-18	235500	1832050	7.78	Mar-19	271450	2012431	7.41	
	Jun-18	218200	1696609	7.78	Apr-19	348350	2608738	7.49	
	Jul-18	233200	1880964	8.07	May-19	273050	2111600	7.73	
	Aug-18	283050	2209230	7.81	Jun-19	303500	2350863	7.75	
	Sep-18	293750	2224970	7.57	Jul-19	297100	2365858	7.96	
THT-199	Dec-17	259704	1921128	7.40	Oct-18	177954	1314248	7.39	79076.00
	Jan-18	286518	2116615	7.39	Nov-18	186846	1379453	7.38	
	Feb-18	246606	1826670	7.41	Dec-18	191994	1414804	7.37	
	Mar-18	209832	1566653	7.47	Jan-19	251832	1834167	7.28	
	Apr-18	222030	1589390	7.16	Feb-19	248652	1804712	7.26	
	May-18	213876	1611901	7.54	Mar-19	242118	1762211	7.28	
	Jun-18	207654	1544421	7.44	Apr-19	268908	1961380	7.29	
	Jul-18	232662	1799420	7.73	May-19	226920	1675465	7.38	
	Aug-18	226206	1709783	7.56	Jun-19	235290	1782902	7.58	
Sep-18	208164	1542768	7.41	Jul-19	231246	1767054	7.64		
THT-321	Dec-17	85500	662311	7.75	Oct-18	119625	893366	7.47	28625.00
	Jan-18	85500	664435	7.77	Nov-18	117250	845370	7.21	
	Feb-18	92675	710938	7.67	Dec-18	121450	982872	8.09	
	Mar-18	103075	780795	7.58	Jan-19	139775	1115578	7.98	
	Apr-18	104850	778755	7.43	Feb-19	112475	938740	8.35	
	May-18	120550	922360	7.65	Mar-19	116025	941846	8.12	
	Jun-18	111050	845719	7.62	Apr-19	120125	973371	8.10	
	Jul-18	121875	964649	7.92	May-19	99625	828416	8.32	
	Aug-18	121275	938468	7.74	Jun-19	105350	891963	8.47	
Sep-18	130600	979022	7.50	Jul-19	103575	889287	8.59		
THT-358	Oct-18	35580	309314	8.69	Mar-19	32212.5	264392	8.21	13466.00
	Nov-18	37455	315828	8.43	Apr-19	40620	325997	8.03	
	Dec-18	34013	290205	8.53	May-19	39375	318480	8.09	
	Jan-19	34193	288691	8.44	Jun-19	39030	326120	8.36	
	Feb-19	33705	284731	8.45	Jul-19	36937.5	314732	8.52	
S13HT-18	Mar-18	262410	3851982	14.68	Jun-19	203410	1826096	8.98	49500.00
	Apr-18	146410	1553073	10.61	Jul-19	204130	1874036	9.18	
	May-18	145110	1538435	10.60	Aug-19	213330	1947936	9.13	
	Jun-18	181360	1892649	10.44	Sep-19	122570	2002197	16.34	
	Jul-18	153710	1729750	11.25	Oct-19	240970	2002197	8.31	
KRRH T-75	Jun-18	317800	2805379	8.83	Jul-19	277950	2491860	8.97	108108.00
	May-18	322300	2622262	8.14	Jun-19	291450	2415366	8.29	

	<b>Apr-18</b>	317700	2592688	<b>8.16</b>	<b>May-19</b>	219375	1870867	<b>8.53</b>	
	<b>Mar-18</b>	289800	2372048	<b>8.19</b>	<b>Apr-19</b>	247200	2149859	<b>8.70</b>	
	<b>Feb-18</b>	303000	2531228	<b>8.35</b>	<b>Mar-19</b>	282600	2413424	<b>8.54</b>	
	<b>Jan-18</b>	291900	2604154	<b>8.92</b>	<b>Feb-19</b>	305475	2596858	<b>8.50</b>	
	<b>Dec-17</b>	312700	2599667	<b>8.31</b>	<b>Jan-19</b>	297450	2520275	<b>8.47</b>	
	<b>Nov-17</b>	269100	2279454	<b>8.47</b>	<b>Dec-18</b>	298650	2537174	<b>8.50</b>	
	<b>Oct-17</b>	289700	2437553	<b>8.41</b>	<b>Nov-18</b>	331350	2784881	<b>8.40</b>	
	<b>Sep-17</b>	308500	2580653	<b>8.37</b>	<b>Oct-18</b>	256500	2457866	<b>9.58</b>	
	<b>Aug-17</b>	305100	2555324	<b>8.38</b>	<b>Sep-18</b>	334575	2794928	<b>8.35</b>	
	<b>Jul-17</b>	277000	2291062	<b>8.27</b>	<b>Aug-18</b>	287625	2604553	<b>9.06</b>	
<b>W4HT-2</b>	<b>Mar-18</b>	690990	7746826	<b>11.21</b>	<b>Sep-18</b>	770490	7448353	<b>9.67</b>	<b>273604.00</b>
	<b>Apr-18</b>	820620	7957257	<b>9.70</b>	<b>Oct-18</b>	752715	7381323	<b>9.81</b>	
	<b>May-18</b>	819450	8174415	<b>9.98</b>	<b>Nov-18</b>	769995	7642539	<b>9.93</b>	
	<b>Jun-18</b>	833385	8075208	<b>9.69</b>	<b>Dec-18</b>	713490	7010437	<b>9.83</b>	
	<b>Jul-18</b>	781605	7585117	<b>9.70</b>	<b>Jan-19</b>	718140	7040305	<b>9.80</b>	
<b>AKLH T-101</b>	<b>Aug-18</b>	782115	7593417	<b>9.71</b>	<b>Feb-19</b>	710610	6977434	<b>9.82</b>	
	<b>Feb-18</b>	278990	2283305	<b>8.18</b>	<b>Aug-18</b>	358270	2924351	<b>8.16</b>	<b>99316.00</b>
	<b>Mar-18</b>	311520	2492496	<b>8.00</b>	<b>Sep-18</b>	337580	2662477	<b>7.89</b>	
	<b>Apr-18</b>	301560	2419173	<b>8.02</b>	<b>Oct-18</b>	307430	2436237	<b>7.92</b>	
	<b>May-18</b>	299120	2567458.35	<b>8.58</b>	<b>Nov-18</b>	302350	2224139	<b>7.36</b>	
	<b>Jun-18</b>	294060	2448832	<b>8.33</b>	<b>Dec-18</b>	334880	2626991	<b>7.84</b>	
<b>Jul-18</b>	334130	2638053	<b>7.90</b>	<b>Jan-19</b>	288320	2292669	<b>7.95</b>		
<b>N3HT-8</b>	<b>Aug-18</b>	25800	252506	<b>9.79</b>	<b>Jan-19</b>	21208	218050	<b>10.28</b>	<b>6363.00</b>
	<b>Jul-18</b>	24500	240104	<b>9.80</b>	<b>Feb-19</b>	19792	203136	<b>10.26</b>	
	<b>Jun-18</b>	27300	238465	<b>8.73</b>	<b>Mar-19</b>	16600	163117	<b>9.83</b>	
	<b>May-18</b>	22813	224019	<b>9.82</b>	<b>Apr-19</b>	17216.3	191237	<b>11.11</b>	
	<b>Apr-18</b>	25987	246259	<b>9.48</b>	<b>May-19</b>	18067.7	192100	<b>10.63</b>	
	<b>Mar-18</b>	21100	206686	<b>9.80</b>	<b>Jun-19</b>	18014	191281	<b>10.62</b>	
	<b>Feb-18</b>	22363	214872	<b>9.61</b>	<b>Jul-19</b>	17600	190022	<b>10.80</b>	
	<b>Jan-18</b>	23353	227299	<b>9.73</b>	<b>Dec-18</b>	20900	213971	<b>10.24</b>	
	<b>Dec-17</b>	22229	198669	<b>8.94</b>	<b>Nov-18</b>	23700	241416	<b>10.19</b>	
	<b>Nov-17</b>	23255	228021	<b>9.81</b>	<b>Oct-18</b>	22200	227811	<b>10.26</b>	
	<b>Oct-17</b>	21867	210118	<b>9.61</b>	<b>Sep-18</b>	22800	229804	<b>10.08</b>	
<b>S4HT-125</b>	<b>Sep-17</b>	145612	1386279	<b>9.52</b>	<b>Aug-18</b>	150164	1526256	<b>10.16</b>	<b>57516.00</b>
	<b>Oct-17</b>	155280	1479722	<b>9.53</b>	<b>Sep-18</b>	144452	1495555	<b>10.35</b>	
	<b>Nov-17</b>	143752	1368926	<b>9.52</b>	<b>Oct-18</b>	155320	1604222	<b>10.33</b>	
	<b>Dec-17</b>	143168	1367004	<b>9.55</b>	<b>Nov-18</b>	146332	1510525	<b>10.32</b>	
	<b>Jan-18</b>	146052	1443745	<b>9.89</b>	<b>Dec-18</b>	151156	1551271	<b>10.26</b>	
	<b>Feb-18</b>	135220	1341415	<b>9.92</b>	<b>Jan-19</b>	146204	1508822	<b>10.32</b>	
	<b>Mar-18</b>	156716	1520347	<b>9.70</b>	<b>Feb-19</b>	138320	1432415	<b>10.36</b>	
	<b>Apr-18</b>	155416	1557572	<b>10.02</b>	<b>Mar-19</b>	162112	1672425	<b>10.32</b>	

	<b>May-18</b>	154236	1547098	<b>10.03</b>	<b>Apr-19</b>	154204	1551717	<b>10.06</b>	
	<b>Jun-18</b>	147792	1484372	<b>10.04</b>	<b>May-19</b>	159544	1602001	<b>10.04</b>	
	<b>Jul-18</b>	150980	1525142	<b>10.10</b>	<b>Jun-19</b>	153888	1585071	<b>10.30</b>	
<b>KGFE HT-2</b>	<b>Jun-17</b>	1448300	12213336	<b>8.43</b>	<b>Jul-18</b>	867500	8126020	<b>9.37</b>	<b>482909.00</b>
	<b>Jul-17</b>	1418999	10217457	<b>7.20</b>	<b>Aug-18</b>	283250	3726369	<b>13.16</b>	
	<b>Aug-17</b>	672549	6531500	<b>9.71</b>	<b>Sep-18</b>	121250	2510560	<b>20.71</b>	
	<b>Sep-17</b>	347600	4149182	<b>11.94</b>	<b>Nov-18</b>	1136100	10473183	<b>9.22</b>	
	<b>Oct-17</b>	643650	6246520	<b>9.70</b>	<b>Dec-18</b>	1081950	10995538	<b>10.16</b>	
	<b>Nov-17</b>	1035750	9293044	<b>8.97</b>	<b>Jan-19</b>	1439950	12693604	<b>8.82</b>	
	<b>Dec-17</b>	1036550	13835648	<b>13.35</b>	<b>Feb-19</b>	938150	8940489	<b>9.53</b>	
	<b>Jan-18</b>	1446000	12286166	<b>8.50</b>	<b>Mar-19</b>	911100	8751789	<b>9.61</b>	
	<b>Feb-18</b>	1570650	13267312	<b>8.45</b>	<b>Apr-19</b>	1387600	12402793	<b>8.94</b>	
	<b>Mar-18</b>	1507350	12911674	<b>8.57</b>	<b>May-19</b>	1171150	10701817	<b>9.14</b>	
	<b>Apr-18</b>	1590800	13576952	<b>8.53</b>	<b>Jun-19</b>	731700	6629233	<b>9.06</b>	
	<b>May-18</b>	1548350	13137593	<b>8.48</b>	<b>Jul-19</b>	344860	4871008	<b>14.12</b>	
<b>RNHT- 449</b>	<b>Jan-18</b>	373400	3221070	<b>8.63</b>	<b>Jan-19</b>	451000	3584218	<b>7.95</b>	<b>78088.00</b>
	<b>Feb-18</b>	394400	3179979	<b>8.06</b>	<b>Feb-19</b>	429600	3435669	<b>8.00</b>	
	<b>Mar-18</b>	339700	2778167	<b>8.18</b>	<b>Mar-19</b>	461500	3621016	<b>7.85</b>	
	<b>Apr-18</b>	388200	2955874	<b>7.61</b>	<b>Apr-19</b>	547800	4246010	<b>7.75</b>	
	<b>May-18</b>	401300	3015690	<b>7.51</b>	<b>May-19</b>	488000	3827389	<b>7.84</b>	
	<b>Jun-18</b>	395300	3517845. 23	<b>8.90</b>	<b>Jun-19</b>	422400	3618778	<b>8.57</b>	
	<b>Jul-18</b>	421500	3447636	<b>8.18</b>	<b>Jul-19</b>	459700	3830501	<b>8.33</b>	
<b>DPHT- 014</b>	<b>Jan-19</b>	89250	760245	<b>8.52</b>	<b>Apr-19</b>	104070	837816	<b>8.05</b>	<b>24900.00</b>
	<b>Feb-19</b>	82620	709976	<b>8.59</b>	<b>May-19</b>	66270	615659	<b>9.29</b>	
	<b>Mar-19</b>	89130	767627	<b>8.61</b>	<b>Jun-19</b>	73860	639094	<b>8.65</b>	
<b>RNHT- 396</b>	<b>Mar-19</b>	108560	970456	<b>8.94</b>	<b>May-19</b>	119160	1083668	<b>9.09</b>	<b>56132.00</b>
	<b>Apr-19</b>	100680	939116	<b>9.33</b>	<b>Jun-19</b>	104040	956168	<b>9.19</b>	
<b>RNHT- 103</b>	<b>Mar-19</b>	220568	1779981	<b>8.07</b>	<b>May-19</b>	247002	2021997	<b>8.19</b>	<b>55605.00</b>
	<b>Apr-19</b>	214816	1761414	<b>8.20</b>	<b>Jun-19</b>	231660	1876763	<b>8.10</b>	
<b>RNHT- 163</b>	<b>Mar-19</b>	183760	1526024	<b>8.30</b>	<b>May-19</b>	118320	1048811	<b>8.86</b>	<b>44647.00</b>
	<b>Apr-19</b>	157720	1326241	<b>8.41</b>	<b>Jun-19</b>	66480	620821	<b>9.34</b>	
<b>RNHT- 353</b>	<b>Nov-18</b>	54037	541003	<b>10.01</b>	<b>Mar-19</b>	60142.5	565678	<b>9.41</b>	<b>10050.00</b>
	<b>Dec-18</b>	62865	624119	<b>9.93</b>	<b>Apr-19</b>	55725	526494	<b>9.45</b>	
	<b>Jan-19</b>	59482	590706	<b>9.93</b>	<b>May-19</b>	55845	556697	<b>9.97</b>	
	<b>Feb-19</b>	52207	518034	<b>9.92</b>	<b>Jun-19</b>	57652.5	566090	<b>9.82</b>	
<b>RNHT- 95</b>	<b>Jan-19</b>	104205	1056689	<b>10.14</b>	<b>Apr-19</b>	99840	1004545	<b>10.06</b>	<b>51254.00</b>
	<b>Feb-19</b>	125295	1246474	<b>9.95</b>	<b>May-19</b>	110310	1188062	<b>10.77</b>	
	<b>Mar-19</b>	117570	1176361	<b>10.01</b>	<b>Jun-19</b>	105255	1097062	<b>10.42</b>	
<b>RNHT- 243</b>	<b>Jul-17</b>	413088	3217188	<b>7.79</b>	<b>Jul-18</b>	352504	2613714	<b>7.41</b>	<b>131997.00</b>
	<b>Aug-17</b>	374336	2860066	<b>7.64</b>	<b>Aug-18</b>	356368	2742559	<b>7.70</b>	
	<b>Sep-17</b>	358072	2739870	<b>7.65</b>	<b>Sep-18</b>	369960	2867136	<b>7.75</b>	

	<b>Oct-17</b>	330208	2542826	<b>7.70</b>	<b>Oct-18</b>	342824	2659013	<b>7.76</b>	
	<b>Nov-17</b>	361872	2766177	<b>7.64</b>	<b>Nov-18</b>	319464	2483818	<b>7.77</b>	
	<b>Dec-17</b>	384600	2944034	<b>7.65</b>	<b>Dec-18</b>	325272	2515100	<b>7.73</b>	
	<b>Jan-18</b>	353464	2705960	<b>7.66</b>	<b>Jan-19</b>	283584	2202523	<b>7.77</b>	
	<b>Feb-18</b>	332288	2554581	<b>7.69</b>	<b>Feb-19</b>	366336	2824238	<b>7.71</b>	
	<b>Mar-18</b>	338568	2546539	<b>7.52</b>	<b>Mar-19</b>	372408	2893574	<b>7.77</b>	
	<b>Apr-18</b>	334944	2518401	<b>7.52</b>	<b>Apr-19</b>	312640	2449337	<b>7.83</b>	
	<b>May-18</b>	346904	2469199	<b>7.12</b>	<b>May-19</b>	270000	2260266	<b>8.37</b>	
	<b>Jun-18</b>	350168	2708956	<b>7.74</b>	<b>Jun-19</b>	227104	1903875	<b>8.38</b>	
<b>RNHT-383</b>	<b>Jan-18</b>	194250	1578934	<b>8.13</b>	<b>Oct-18</b>	265200	2097628	<b>7.91</b>	<b>69148.00</b>
	<b>Feb-18</b>	227650	1825529	<b>8.02</b>	<b>Nov-18</b>	274500	2198885	<b>8.01</b>	
	<b>Mar-18</b>	254350	1979832	<b>7.78</b>	<b>Dec-18</b>	278600	2198885	<b>7.89</b>	
	<b>Apr-18</b>	252750	1979466	<b>7.83</b>	<b>Jan-19</b>	210250	1680830	<b>7.99</b>	
	<b>May-18</b>	261900	2058093	<b>7.86</b>	<b>Feb-19</b>	156250	1344590	<b>8.61</b>	
	<b>Jun-18</b>	277700	2217518	<b>7.99</b>	<b>Mar-19</b>	158800	1282959	<b>8.08</b>	
	<b>Jul-18</b>	283650	2263928	<b>7.98</b>	<b>Apr-19</b>	194300	1542998	<b>7.94</b>	
	<b>Aug-18</b>	311100	2561038	<b>8.23</b>	<b>May-19</b>	218250	1851049	<b>8.48</b>	
	<b>Sep-18</b>	274200	2292036	<b>8.36</b>	<b>Jun-19</b>	231500	1911553	<b>8.26</b>	
<b>RNHT-310</b>	<b>Jan-18</b>	234200	2023570	<b>8.64</b>	<b>Oct-18</b>	208700	1915950	<b>9.18</b>	<b>107332.00</b>
	<b>Feb-18</b>	266500	2281021	<b>8.56</b>	<b>Nov-18</b>	258000	2326230	<b>9.02</b>	
	<b>Mar-18</b>	290000	2400090	<b>8.28</b>	<b>Dec-18</b>	268500	2361940	<b>8.80</b>	
	<b>Apr-18</b>	211200	1817464	<b>8.61</b>	<b>Jan-19</b>	279300	2429847	<b>8.70</b>	
	<b>May-18</b>	275200	2141707	<b>7.78</b>	<b>Feb-19</b>	722100	2516980	<b>3.49</b>	
	<b>Jun-18</b>	308700	2637547	<b>8.54</b>	<b>Mar-19</b>	302500	2630362	<b>8.70</b>	
	<b>Jul-18</b>	310000	2672432	<b>8.62</b>	<b>Apr-19</b>	238000	2139926	<b>8.99</b>	
	<b>Aug-18</b>	263800	2400659	<b>9.10</b>	<b>May-19</b>	286100	2650229	<b>9.26</b>	
	<b>Sep-18</b>	287100	2583214	<b>9.00</b>	<b>Jun-19</b>	292100	2654262	<b>9.09</b>	
<b>RNHT-341</b>	<b>Jan-18</b>	267500	2157085	<b>8.06</b>	<b>Oct-18</b>	271950	2579147	<b>9.48</b>	<b>105499.00</b>
	<b>Feb-18</b>	265150	2126486	<b>8.02</b>	<b>Nov-18</b>	265050	2521243	<b>9.51</b>	
	<b>Mar-18</b>	303450	2667332	<b>8.79</b>	<b>Dec-18</b>	356100	4360172	<b>12.24</b>	
	<b>Apr-18</b>	255900	2308304	<b>9.02</b>	<b>Jan-19</b>	331200	2996429	<b>9.05</b>	
	<b>May-18</b>	292650	2279246	<b>7.79</b>	<b>Feb-19</b>	322350	2934476	<b>9.10</b>	
	<b>Jun-18</b>	290700	2686564	<b>9.24</b>	<b>Mar-19</b>	380250	3377819	<b>8.88</b>	
	<b>Jul-18</b>	279000	2596048	<b>9.30</b>	<b>Apr-19</b>	325200	2987369	<b>9.19</b>	
	<b>Aug-18</b>	297750	2828425	<b>9.50</b>	<b>May-19</b>	364350	3457452	<b>9.49</b>	
	<b>Sep-18</b>	293100	2811393	<b>9.59</b>	<b>Jun-19</b>	367050	3428874	<b>9.34</b>	
<b>S5HT-94</b>	<b>Jan-18</b>	17419	171533	<b>9.85</b>	<b>Jan-19</b>	15729	160498	<b>10.20</b>	<b>5700.00</b>
	<b>Feb-18</b>	17764	174694	<b>9.83</b>	<b>Feb-19</b>	14736	151280	<b>10.27</b>	
	<b>Mar-18</b>	16617	164083	<b>9.87</b>	<b>Mar-19</b>	14388	159493	<b>11.09</b>	
	<b>Apr-18</b>	17385	168371	<b>9.68</b>	<b>Apr-19</b>	16848	162929	<b>9.67</b>	
	<b>May-18</b>	16426	159802	<b>9.73</b>	<b>May-19</b>	16250	166353	<b>10.24</b>	

	<b>Jun-18</b>	16215	151195	<b>9.32</b>	<b>Jun-19</b>	16040	170114	<b>10.61</b>	
<b>N2HT-2</b>	<b>Sep-17</b>	166960	1607518	<b>9.63</b>	<b>Sep-18</b>	150102	1471807	<b>9.81</b>	<b>59129.00</b>
	<b>Oct-17</b>	161976	1563061	<b>9.65</b>	<b>Oct-18</b>	146285	1474481	<b>10.08</b>	
	<b>Nov-17</b>	165954	1598850	<b>9.63</b>	<b>Nov-18</b>	153900	1535790	<b>9.98</b>	
	<b>Dec-17</b>	157056	1516758	<b>9.66</b>	<b>Dec-18</b>	147325	1478171	<b>10.03</b>	
	<b>Jan-18</b>	158280	1529770	<b>9.66</b>	<b>Jan-19</b>	154925	1541473	<b>9.95</b>	
	<b>Feb-18</b>	157530	1521733	<b>9.66</b>	<b>Feb-19</b>	148325	1476222	<b>9.95</b>	
	<b>Mar-18</b>	144168	1399331	<b>9.71</b>	<b>Mar-19</b>	136475	1365054	<b>10.00</b>	
	<b>Apr-18</b>	165186	1563810	<b>9.47</b>	<b>Apr-19</b>	170050	1694077	<b>9.96</b>	
	<b>May-18</b>	166716	1580157	<b>9.48</b>	<b>May-19</b>	170450	1699498	<b>9.97</b>	
	<b>Jun-18</b>	168168	1489548	<b>8.86</b>	<b>Jun-19</b>	154625	1382774	<b>8.94</b>	
	<b>Jul-18</b>	156636	1542781	<b>9.85</b>	<b>Jul-19</b>	147725	1551295	<b>10.50</b>	
<b>DHTP-20</b>	<b>Nov-18</b>	1509840	11419803	<b>7.56</b>	<b>Oct-19</b>	1316340	11362798	<b>8.63</b>	<b>434961.00</b>
	<b>Oct-18</b>	1431360	10317420	<b>7.21</b>	<b>Sep-19</b>	1297800	11317187	<b>8.72</b>	
	<b>Sep-18</b>	1430100	9073396	<b>6.34</b>	<b>Aug-19</b>	1407780	12223854	<b>8.68</b>	
	<b>Aug-18</b>	1368720	7853844	<b>5.74</b>	<b>Jul-19</b>	1349460	11739018	<b>8.70</b>	
<b>DHTP-222</b>	<b>Jul-18</b>	65400	600400	<b>9.18</b>	<b>Dec-18</b>	40280	620950	<b>15.42</b>	<b>31147.00</b>
	<b>Jun-18</b>	63000	602615	<b>9.57</b>	<b>Nov-18</b>	35240	636093	<b>18.05</b>	
	<b>May-18</b>	60360	611112	<b>10.12</b>	<b>Oct-18</b>	40320	597148	<b>14.81</b>	
	<b>Apr-18</b>	60480	551244	<b>9.11</b>	<b>Sep-18</b>	34240	564906	<b>16.50</b>	
	<b>Mar-18</b>	56240	525445	<b>9.34</b>	<b>Oct-18</b>	23200	577200	<b>24.88</b>	
<b>DHTP-195</b>	<b>Aug-18</b>	1978800	12588538	<b>6.36</b>	<b>Jul-19</b>	1883800	16161134	<b>8.58</b>	<b>217614.00</b>
	<b>Jul-18</b>	1919200	11752622	<b>6.12</b>	<b>Jun-19</b>	1619000	13864257	<b>8.56</b>	
	<b>Jun-18</b>	1792800	13099045	<b>7.31</b>	<b>Jan-19</b>	909200	7727312	<b>8.50</b>	
	<b>May-18</b>	1717200	10885672	<b>6.34</b>	<b>Dec-18</b>	1483400	12250762	<b>8.26</b>	
<b>HKHT-312</b>	<b>Feb-18</b>	207416	2081530	<b>10.04</b>	<b>Aug-18</b>	146136	1434618	<b>9.82</b>	<b>74708.00</b>
	<b>Mar-18</b>	180680	1762168	<b>9.75</b>	<b>Sep-18</b>	141656	1433220	<b>10.12</b>	
	<b>Apr-18</b>	203056	1931635	<b>9.51</b>	<b>Oct-18</b>	126384	1289477	<b>10.20</b>	
	<b>May-18</b>	206792	1950311	<b>9.43</b>	<b>Nov-18</b>	158472	1577177	<b>9.95</b>	
	<b>Jun-18</b>	200128	2014069	<b>10.06</b>	<b>Dec-18</b>	172656	1714340	<b>9.93</b>	
	<b>Jul-18</b>	143472	1437366	<b>10.02</b>	<b>Jan-19</b>	170328	1681206	<b>9.87</b>	
<b>HKHT-248</b>	<b>Jun-18</b>	718875	4684768.6	<b>6.52</b>	<b>Dec-18</b>	604575	663657	<b>1.10</b>	<b>23805.00</b>
	<b>Jul-18</b>	706350	1832532	<b>2.59</b>	<b>Jan-19</b>	736575	2246797	<b>3.05</b>	
	<b>Aug-18</b>	773175	2586891	<b>3.35</b>	<b>Feb-19</b>	736575	2246797	<b>3.05</b>	
	<b>Sep-18</b>	731475	2164710	<b>2.96</b>	<b>Mar-19</b>	676125	2049854	<b>3.03</b>	
	<b>Oct-18</b>	699300	500231	<b>0.72</b>	<b>Apr-19</b>	724500	2163355	<b>2.99</b>	
	<b>Nov-18</b>	736725	1644043	<b>2.23</b>	<b>May-19</b>	665850	5003679	<b>7.51</b>	
<b>HKHT-101</b>	<b>Jun-18</b>	329805	778220.48	<b>2.36</b>	<b>Dec-18</b>	283745	599585	<b>2.11</b>	<b>31113.00</b>
	<b>Jul-18</b>	323505	497009	<b>1.54</b>	<b>Jan-19</b>	336945	1925804	<b>5.72</b>	
	<b>Aug-18</b>	343805	465177	<b>1.35</b>	<b>Feb-19</b>	340165	1175471	<b>3.46</b>	

	<b>Sep-18</b>	326795	394991	<b>1.21</b>	<b>Mar-19</b>	313880	1114731	<b>3.55</b>	
	<b>Oct-18</b>	322420	422422	<b>1.31</b>	<b>Apr-19</b>	333865	954159	<b>2.86</b>	
	<b>Nov-18</b>	332500	424607	<b>1.28</b>	<b>May-19</b>	322875	1503432	<b>4.66</b>	
<b>HKHT-190</b>	<b>Mar-18</b>	194670	1450590	<b>7.45</b>	<b>Sep-18</b>	291480	2178972	<b>7.48</b>	<b>64250.00</b>
	<b>Apr-18</b>	172086	1263463	<b>7.34</b>	<b>Oct-18</b>	267588	2044119	<b>7.64</b>	
	<b>May-18</b>	209052	1528464	<b>7.31</b>	<b>Nov-18</b>	217284	1610259	<b>7.41</b>	
	<b>Jun-18</b>	227904	1749954.8	<b>7.68</b>	<b>Dec-18</b>	176988	1390048	<b>7.85</b>	
	<b>Jul-18</b>	248496	2102478	<b>8.46</b>	<b>Jan-19</b>	239292	1895000	<b>7.92</b>	
	<b>Aug-18</b>	243756	1861732	<b>7.64</b>	<b>Feb-19</b>	249432	1984099	<b>7.95</b>	
<b>HKHT-154</b>	<b>Sep-18</b>	161610	1403441	<b>8.68</b>	<b>Mar-19</b>	132070	1135914	<b>8.60</b>	<b>70678.00</b>
	<b>Oct-18</b>	129870	1165779	<b>8.98</b>	<b>Apr-19</b>	166920	1415049	<b>8.48</b>	
	<b>Nov-18</b>	129190	1161068	<b>8.99</b>	<b>May-19</b>	145200	1253782	<b>8.63</b>	
	<b>Dec-18</b>	143410	1273799	<b>8.88</b>	<b>Jun-19</b>	151710	1376660.76	<b>9.07</b>	
	<b>Jan-19</b>	156260	1380004	<b>8.83</b>	<b>Jul-19</b>	144790	1309768	<b>9.05</b>	
<b>HKHT 115</b>	<b>Jan-18</b>	491175	3807914	<b>7.75</b>	<b>Oct-18</b>	375450	2957748	<b>7.88</b>	<b>80086.00</b>
	<b>Feb-18</b>	419625	294728	<b>0.70</b>	<b>Nov-18</b>	361575	2857787	<b>7.90</b>	
	<b>Mar-18</b>	316275	2525139	<b>7.98</b>	<b>Dec-18</b>	392925	3098410	<b>7.89</b>	
	<b>Apr-18</b>	625050	1577551	<b>2.52</b>	<b>Jan-19</b>	346200	2742449	<b>7.92</b>	
	<b>May-18</b>	283875	676014	<b>2.38</b>	<b>Feb-19</b>	245025	2046160	<b>8.35</b>	
	<b>Jun-18</b>	322425	1052978	<b>3.27</b>	<b>Mar-19</b>	274650	2256862	<b>8.22</b>	
<b>S6HT-43</b>	<b>Dec-19</b>	28062	297825	<b>10.61</b>	<b>Jan-19</b>	26254	289053	<b>11.01</b>	<b>18710.00</b>
	<b>Nov-19</b>	29922	315646	<b>10.55</b>	<b>Feb-19</b>	32330	270806	<b>8.38</b>	
	<b>Oct-19</b>	28556	302803	<b>10.60</b>	<b>Mar-19</b>	27943	332937	<b>11.91</b>	
	<b>Sep-19</b>	30280	312675	<b>10.33</b>	<b>Apr-19</b>	27942	289685	<b>10.37</b>	
	<b>Aug-19</b>	30022	286762	<b>9.55</b>	<b>May-19</b>	29386	308299	<b>10.49</b>	
	<b>Jul-19</b>	28222	301894	<b>10.70</b>	<b>Jun-19</b>	29864	316971	<b>10.61</b>	
<b>KRUH T-18</b>	<b>Jul-17</b>	324900	2848268	<b>8.77</b>	<b>Jun-18</b>	439950	3286765	<b>7.47</b>	<b>108108.00</b>
	<b>Aug-17</b>	321600	2695133	<b>8.38</b>	<b>Jul-18</b>	511950	3713605	<b>7.25</b>	
	<b>Sep-17</b>	302700	2656066	<b>8.77</b>	<b>Aug-18</b>	502950	3913499	<b>7.78</b>	
	<b>Oct-17</b>	285750	2691745	<b>9.42</b>	<b>Sep-18</b>	440550	3564549	<b>8.09</b>	
	<b>Nov-17</b>	291900	4064617	<b>13.92</b>	<b>Oct-18</b>	538050	4167146	<b>7.74</b>	
	<b>Dec-17</b>	335700	2905592	<b>8.66</b>	<b>Nov-18</b>	477000	3872192	<b>8.12</b>	
	<b>Jan-18</b>	389100	3298728	<b>8.48</b>	<b>Dec-18</b>	429750	3388850	<b>7.89</b>	
	<b>Feb-18</b>	394800	3343584	<b>8.47</b>	<b>Jan-19</b>	438000	3429889	<b>7.83</b>	
	<b>Mar-18</b>	394350	3278583	<b>8.31</b>	<b>Feb-19</b>	420600	3286884	<b>7.81</b>	
	<b>Apr-18</b>	376800	3151037	<b>8.36</b>	<b>Mar-19</b>	439200	3487647	<b>7.94</b>	
	<b>May-18</b>	373200	2969844	<b>7.96</b>	<b>Apr-19</b>	309600	2743091	<b>8.86</b>	
<b>3EHT-10</b>	<b>Oct-18</b>	51425	1331241	<b>25.89</b>	<b>Nov-18</b>	141650	1495240	<b>10.56</b>	<b>80572.00</b>
	<b>Sep-18</b>	142290	1447118	<b>10.17</b>	<b>Dec-18</b>	124725	1305001	<b>10.46</b>	
	<b>Aug-18</b>	144775	1439681	<b>9.94</b>	<b>Jan-19</b>	123575	1334799	<b>10.80</b>	
	<b>Jul-18</b>	146705	1410670	<b>9.62</b>	<b>Feb-19</b>	121225	1284065	<b>10.59</b>	



	<b>Jun-18</b>	159385	1443440	<b>9.06</b>	<b>Mar-19</b>	141900	1285802	<b>9.06</b>	
	<b>May-18</b>	156755	1507968	<b>9.62</b>	<b>Apr-19</b>	144000	1498823	<b>10.41</b>	
	<b>Apr-18</b>	151565	1458085	<b>9.62</b>	<b>May-19</b>	164024	1518737	<b>9.26</b>	
	<b>Mar-18</b>	137140	1339305	<b>9.77</b>	<b>Jun-19</b>	148425	1490279	<b>10.04</b>	
<b>AKLH T-482</b>	<b>Nov-18</b>	108380	1082140	<b>9.98</b>	<b>Feb-19</b>	119550	956841	<b>8.00</b>	<b>36238.00</b>
	<b>Dec-18</b>	141625	1214328	<b>8.57</b>	<b>Mar-19</b>	147325	1226949	<b>8.33</b>	
	<b>Jan-19</b>	161825	1363846	<b>8.43</b>	<b>Apr-19</b>	126500	902480	<b>7.13</b>	
<b>N4HT- 49</b>	<b>Nov-17</b>	190944	1643623	<b>8.61</b>	<b>Sep-18</b>	255032	2025144	<b>7.94</b>	<b>76388.00</b>
	<b>Dec-17</b>	235496	1693221	<b>7.19</b>	<b>Oct-18</b>	237848	1927036	<b>8.10</b>	
	<b>Jan-18</b>	233568	1873043	<b>8.02</b>	<b>Nov-18</b>	223960	1847884	<b>8.25</b>	
	<b>Feb-18</b>	231832	1849585	<b>7.98</b>	<b>Dec-18</b>	249264	2020713	<b>8.11</b>	
	<b>Mar-18</b>	259488	1840346	<b>7.09</b>	<b>Jan-19</b>	235032	1922830	<b>8.18</b>	
	<b>Apr-18</b>	241856	2013311	<b>8.32</b>	<b>Feb-19</b>	252416	2031821	<b>8.05</b>	
	<b>May-18</b>	240992	1885697	<b>7.82</b>	<b>Mar-19</b>	261952	2119922	<b>8.09</b>	
	<b>Jun-18</b>	256256	1829178	<b>7.14</b>	<b>Apr-19</b>	238616	1993811	<b>8.36</b>	
	<b>Jul-18</b>	181519	2074322	<b>11.43</b>	<b>May-19</b>	244264	2025139	<b>8.29</b>	
	<b>Aug-18</b>	193404	1990373	<b>10.29</b>	<b>Jun-19</b>	209432	1788730	<b>8.54</b>	
<b>N5HT- 449</b>	<b>May-18</b>	149260	1138244	<b>7.63</b>	<b>Dec-18</b>	156340	1235285	<b>7.90</b>	<b>43629.00</b>
	<b>Jun-18</b>	144115	1092471	<b>7.58</b>	<b>Jan-19</b>	133455	1064244	<b>7.97</b>	
	<b>Jul-18</b>	152810	1214846	<b>7.95</b>	<b>Feb-19</b>	143140	1138900	<b>7.96</b>	
	<b>Aug-18</b>	160220	1270126	<b>7.93</b>	<b>Mar-19</b>	152710	1221945	<b>8.00</b>	
	<b>Sep-18</b>	154580	1248020	<b>8.07</b>	<b>Apr-19</b>	123615	1026280	<b>8.30</b>	
	<b>Oct-18</b>	151970	1262523	<b>8.31</b>	<b>May-19</b>	136975	1131758	<b>8.26</b>	
	<b>Nov-18</b>	152835	1281898	<b>8.39</b>	<b>Jun-19</b>	134860	1130086	<b>8.38</b>	
<b>N5HT- 337</b>	<b>Sep-18</b>	28280	438544	<b>15.51</b>	<b>Feb-19</b>	72680	668897	<b>9.20</b>	<b>31036.00</b>
	<b>Oct-18</b>	31840	383736	<b>12.05</b>	<b>Mar-19</b>	71640	652654	<b>9.11</b>	
	<b>Nov-18</b>	27560	351733	<b>12.76</b>	<b>Apr-19</b>	71760	680817	<b>9.49</b>	
	<b>Dec-18</b>	44520	475930	<b>10.69</b>	<b>May-19</b>	69800	669476	<b>9.59</b>	
	<b>Jan-19</b>	43200	444409	<b>10.29</b>	<b>Jun-19</b>	62080	615000	<b>9.91</b>	
<b>N5HT- 519</b>	<b>Sep-18</b>	156140	1299218	<b>8.32</b>	<b>Feb-19</b>	128556	1073334	<b>8.35</b>	<b>56536.00</b>
	<b>Oct-18</b>	153026	1288622	<b>8.42</b>	<b>Mar-19</b>	154292	1273536	<b>8.25</b>	
	<b>Nov-18</b>	151944	1298607	<b>8.55</b>	<b>Apr-19</b>	140796	1202635	<b>8.54</b>	
	<b>Dec-18</b>	112880	983532	<b>8.71</b>	<b>May-19</b>	120616	1030874	<b>8.55</b>	
	<b>Jan-19</b>	144640	1232988	<b>8.52</b>	<b>Jun-19</b>	158064	1369750	<b>8.67</b>	
<b>N4HT- 532</b>	<b>Dec-18</b>	162300	1338416	<b>8.25</b>	<b>Apr-19</b>	176350	1541545	<b>8.74</b>	<b>55881.00</b>
	<b>Jan-19</b>	125150	1156627	<b>9.24</b>	<b>May-19</b>	161600	1430153	<b>8.85</b>	
	<b>Feb-19</b>	133050	1210520	<b>9.10</b>	<b>Jun-19</b>	169350	1514240	<b>8.94</b>	
	<b>Mar-19</b>	146700	1317412	<b>8.98</b>	<b>Jul-19</b>	127350	1216838	<b>9.56</b>	
<b>N5HT- 580</b>	<b>Jan-19</b>	45050	513668	<b>11.40</b>	<b>May-19</b>	30100	404376	<b>13.43</b>	<b>63650.00</b>
	<b>Feb-19</b>	49900	416470	<b>8.35</b>	<b>Jun-19</b>	28100	395378	<b>14.07</b>	
	<b>Mar-19</b>	39350	451652	<b>11.48</b>	<b>Jul-19</b>	42600	524752	<b>12.32</b>	

N5HT-522	Sep-18	54580	471346	8.64	Feb-19	78476	626443	7.98	20913.00
	Oct-18	67288	572615	8.51	Mar-19	88124	700347	7.95	
	Nov-18	68716	590347	8.59	Apr-19	83152	685268	8.24	
	Dec-18	82296	689080	8.37	May-19	86628	709257	8.19	
	Jan-19	85852	720418	8.39	Jun-19	83316	715255	8.58	
S9HT-11	Jan-18	36420	347143	9.53	Jan-19	36603	345214	9.43	13497.00
	Feb-18	32760	313445	9.57	Feb-19	34248	336212	9.82	
	Mar-18	36689	345389	9.41	Mar-19	43032	427231	9.93	
	Apr-18	36839	366339	9.94	Apr-19	38114	375663	9.86	
	May-18	36908	358273	9.71	May-19	36749	369912	10.07	
	Jun-18	33043	320948	9.71	Jun-19	36387	379970	10.44	
S9HT-18	Jan-18	7727	76596	9.91	Jan-19	12874	121874	9.47	39740.00
	Feb-18	8484	84167	9.92	Feb-19	12163	114746.5	9.43	
	Mar-18	8184	78651	9.61	Mar-19	14540.5	144144.5	9.91	
	Apr-18	7834	81511	10.41	Apr-19	13938.5	137412	9.86	
	May-18	8627	79344	9.20	May-19	14461.5	128243.5	8.87	
	Jun-18	9386	86334	9.20	Jun-19	13895	146487.5	10.54	
S9HT-79	Jan-18	19040	204413	10.74	Jan-19	13674	135211	9.89	7991.00
	Feb-18	21587	185272	8.58	Feb-19	13439	132829	9.88	
	Mar-18	22205	206110	9.28	Mar-19	15546	158542	10.20	
	Apr-18	22538	210174	9.33	Apr-19	15036	153865	10.23	
	May-18	19300	217278	11.26	May-19	14518	151641	10.45	
	Jun-18	20845	220358	10.57	Jun-19	13845	150670	10.88	
S9HT-78	Jan-18	30216	293651	9.72	Jan-19	27893	261641	9.38	11277.00
	Feb-18	28737	280181	9.75	Feb-19	26098	280386	10.74	
	Mar-18	33488	318111	9.50	Mar-19	31210	313266	10.04	
	Apr-18	32104	305609	9.52	Apr-19	30082	296272	9.85	
	May-18	32386	316555	9.77	May-19	28436	309012	10.87	
	Jun-18	28646	319178	11.14	Jun-19	26925	289851	10.77	
YHT-30	Jul-17	34398	344420	10.01	Aug-18	36067	348950	9.68	11647.00
	Aug-17	34725	332399	9.57	Sep-18	35087	348811	9.94	
	Sep-17	33867	326129	9.63	Oct-18	33245	336073	10.11	
	Oct-17	32983	314529	9.54	Nov-18	34977	350116	10.01	
	Nov-17	33714	321355	9.53	Dec-18	33372	337399	10.11	
	Dec-17	32567	310223	9.53	Jan-19	34335	345670	10.07	
	Jan-18	33869	343325	10.14	Feb-19	34575	350223	10.13	
	Feb-18	34187	325470	9.52	Mar-19	30783	315487	10.25	
	Mar-17	30410	291546	9.59	Apr-19	35034	344503	9.83	
	Apr-18	35700	334285	9.36	May-19	32544	319469	9.82	
	May-18	36691	344226	9.38	Jun-19	31899	321409	10.08	
	Jun-18	36654	365485	9.97	Jul-19	28864	295215	10.23	

	<b>Jul-18</b>	35043	340146	<b>9.71</b>	<b>Aug-19</b>	25977	267906	<b>10.31</b>	
<b>S6HT-7</b>	<b>Nov-18</b>	122185	1000101	<b>8.19</b>	<b>Oct-19</b>	124728	1023347	<b>8.20</b>	<b>60948.00</b>
	<b>Dec-18</b>	113976	939580	<b>8.24</b>	<b>Nov-19</b>	126916	1040831	<b>8.20</b>	
<b>ATBH T-189</b>	<b>Jun-18</b>	641200	4001296	<b>6.24</b>	<b>Apr-19</b>	479000	3604545	<b>7.53</b>	<b>134000.00</b>
	<b>Jul-18</b>	544700	5318285	<b>9.76</b>	<b>May-19</b>	533600	4305469.26	<b>8.07</b>	
	<b>Aug-18</b>	404100	6435763	<b>15.93</b>	<b>Jun-19</b>	506700	4122317	<b>8.14</b>	
<b>HKHT-87</b>	<b>Feb-19</b>	60360	596235	<b>9.88</b>	<b>May-19</b>	66540	643333	<b>9.67</b>	<b>10050.00</b>
	<b>Mar-19</b>	33382.5	341121	<b>10.22</b>	<b>Jun-19</b>	59010	608388	<b>10.31</b>	
	<b>Apr-19</b>	71160	974772	<b>13.70</b>	<b>Jul-19</b>	58725	602248	<b>10.26</b>	
<b>W2HT-1</b>	<b>Mar'18</b>	197572	1843022	<b>9.33</b>	<b>Jan'19</b>	141540	1533141	<b>10.83</b>	<b>62790.00</b>
	<b>Apr'18</b>	174444	1543741	<b>8.85</b>	<b>Feb'19</b>	131272	1425541	<b>10.86</b>	
	<b>May'18</b>	170052	1646420	<b>9.68</b>	<b>Mar'19</b>	160068	1735059	<b>10.84</b>	
	<b>Jun'18</b>	158108	1536271	<b>9.72</b>	<b>Apr'19</b>	152320	1629560	<b>10.70</b>	
	<b>Jul'18</b>	162448	1584477	<b>9.75</b>	<b>May'19</b>	151076	1631349	<b>10.80</b>	
	<b>Aug'18</b>	159080	1587473	<b>9.98</b>	<b>Jun'19</b>	134976	1479607	<b>10.96</b>	
<b>CHKE HT-20</b>	<b>Aug-18</b>	6696600	51827748	<b>7.74</b>	<b>Feb-19</b>	7377600	55803504	<b>7.56</b>	<b>153112.00</b>
	<b>Jul-18</b>	6197400	48301637	<b>7.79</b>	<b>Jan-19</b>	6993600	52272310	<b>7.47</b>	
	<b>Jun-18</b>	6265800	50027993	<b>7.98</b>	<b>Dec-18</b>	6617400	50684104	<b>7.66</b>	
	<b>May-18</b>	5523000	50446241	<b>9.13</b>	<b>Nov-18</b>	6894600	52176177	<b>7.57</b>	
	<b>Apr-18</b>	457968	3462711	<b>7.56</b>	<b>Oct-18</b>	6263400	47927622	<b>7.65</b>	
	<b>Mar-18</b>	413040	3187169	<b>7.72</b>	<b>Sep-18</b>	6634200	50028602	<b>7.54</b>	
<b>HKHT-40</b>	<b>Jul-18</b>	235400	2359879	<b>10.02</b>	<b>Jan-19</b>	236250	2279903	<b>9.65</b>	<b>52063.00</b>
	<b>Jun-18</b>	198600	2200713	<b>11.08</b>	<b>Feb-19</b>	232500	2240872	<b>9.64</b>	
	<b>May-18</b>	206660	2022068	<b>9.78</b>	<b>Mar-19</b>	204875	2034585	<b>9.93</b>	
	<b>Apr-18</b>	259200	2414126	<b>9.31</b>	<b>Apr-19</b>	223125	2191912	<b>9.82</b>	
	<b>Mar-18</b>	214000	2108784	<b>9.85</b>	<b>May-19</b>	203000	2034243	<b>10.02</b>	
	<b>Feb-18</b>	201800	2020875	<b>10.01</b>	<b>Jun-19</b>	217000	2280673	<b>10.51</b>	
	<b>Jan-18</b>	213600	1446136	<b>6.77</b>	<b>Jul-19</b>	208000	2155066	<b>10.36</b>	
<b>HKHT-388</b>	<b>Jul-18</b>	82425	679582	<b>8.24</b>	<b>Jan-19</b>	107125	894320	<b>8.35</b>	<b>26002.00</b>
	<b>Jun-18</b>	98100	825380	<b>8.41</b>	<b>Feb-19</b>	103650	869168	<b>8.39</b>	
	<b>May-18</b>	96925	753195	<b>7.77</b>	<b>Mar-19</b>	97775	820897	<b>8.40</b>	
	<b>Apr-18</b>	109800	845435	<b>7.70</b>	<b>Apr-19</b>	125500	1047249	<b>8.34</b>	
	<b>Mar-18</b>	86925	689838	<b>7.94</b>	<b>May-19</b>	111275	938438	<b>8.43</b>	
	<b>Feb-18</b>	94225	740097	<b>7.85</b>	<b>Jun-19</b>	103825	931587	<b>8.97</b>	
	<b>Jan-18</b>	78450	630461	<b>8.04</b>	<b>Jul-19</b>	94325	837512	<b>8.88</b>	
<b>C2HT-9</b>	<b>Aug-18</b>	94272	952185	<b>10.10</b>	<b>Feb-19</b>	78591	805214	<b>10.25</b>	<b>30138.00</b>
	<b>Jul-18</b>	90708	917544	<b>10.12</b>	<b>Jan-19</b>	81897	838172	<b>10.23</b>	
	<b>Jun-18</b>	98490	991835	<b>10.07</b>	<b>Dec-18</b>	80607	827878	<b>10.27</b>	
	<b>May-18</b>	95985	937690	<b>9.77</b>	<b>Nov-18</b>	88056	870544	<b>9.89</b>	
	<b>Apr-18</b>	95220	944537	<b>9.92</b>	<b>Oct-18</b>	92619	957548	<b>10.34</b>	
	<b>Mar-18</b>	77274	787554	<b>10.19</b>	<b>Sep-18</b>	95568	971987	<b>10.17</b>	

CDPH T-150	Jan-18	356050	2846317	7.99	Jan-19	329750	2824891	8.57	138759.00
	Feb-18	328900	2633155	8.01	Feb-19	354750	2912880	8.21	
	Mar-18	371950	2907735	7.82	Mar-19	402825	3295439	8.18	
	Apr-18	347900	2728290	7.84	Apr-19	375225	3084901	8.22	
	May-18	353300	2908735	8.23	May-19	355425	3111676	8.75	
	Jun-18	350500	2850878	8.13	Jun-19	379050	3252827	8.58	
N5HT- 550	Dec-18	63375	518277	8.18	Apr-19	106625	656001	6.15	16750.00
	Jan-19	81000	651092	8.04	May-19	78425	431879	5.51	
	Feb-19	77500	631988	8.15	Jun-19	59000	465328	7.89	
	Mar-19	73375	589337	8.03	Jul-19	56137	492813	8.78	
N4HT- 203	Dec-18	52332	422829	8.08	Apr-19	19656	209522	10.66	26800.00
	Jan-19	55340	443208	8.01	May-19	49056	449524	9.16	
	Feb-19	57472	456612	7.94	Jun-19	48548	453122	9.33	
	Mar-19	53344	432393	8.11	Jul-19	54304	468815	8.63	
N5HT- 553	Feb-19	82250	673039	8.18	May-19	82925	670110	8.08	16750.00
	Mar-19	77287	599813	7.76	Jun-19	82325	673881	8.19	
	Apr-19	85450	691490	8.09	Jul-19	82751	569280	6.88	
DHT- 20	Dec-17	91208	868351	9.52	Oct-18	91116	923058	10.13	32524.00
	Jan-18	89920	855852	9.52	Nov-18	97096	934057	9.62	
	Feb-18	92360	877233	9.50	Dec-18	64828	648090	10.00	
	Mar-18	85108	813029	9.55	Jan-19	66316	659012	9.94	
	Apr-18	98524	923351	9.37	Feb-19	65576	652288	9.95	
	May-18	95984	900439	9.38	Mar-19	64236	641695	9.99	
	Jun-18	97444	881820	9.05	Apr-19	72304	731819	10.12	
	Jul-18	91440	883050	9.66	May-19	71196	715971	10.06	
	Aug-18	94592	914417	9.67	Jun-19	72676	678746	9.34	
Sep-18	93448	925268	9.90	Jul-19	66268	706454	10.66		
RNHT- 392	Jan-18	80890	608840	7.53	Jan-19	82260	607049	7.38	10720.00
	Feb-18	44310	347439	7.84	Feb-19	89910	662126	7.36	
	Mar-18	72330	547070	7.56	Mar-19	87630	645213	7.36	
	Apr-18	80120	591920	7.39	Apr-19	95360	706084	7.40	
	May-18	79760	577183	7.24	May-19	93080	689383	7.41	
	Jun-18	95670	738298	7.72	Jun-19	76690	630652	8.22	
	Jul-18	60660	467837	7.71	Jul-19	93590	742420	7.93	
THT- 38	Aug-18	100176	971985	9.70	Feb-19	95562	982489	10.28	32476.00
	Sep-18	99840	997571	9.99	Mar-19	85449	846920	9.91	
	Oct-18	96810	979185	10.11	Apr-19	100560	994933	9.89	
	Nov-18	99558	1007249	10.12	May-19	74544	754183	10.12	
	Dec-18	94698	963279	10.17	Jun-19	64218	675116	10.51	
	Jan-19	99633	1008129	10.12	Jul-19	58329	626112	10.73	
<b>Grand Total</b>		<b>136811154</b>	<b>1110390 668</b>	<b>8.1</b>		<b>147269081</b>	<b>1215752614</b>	<b>8.3</b>	

#### **IV. Tariff to be fixed for Backup supply from BESCOM to Railway EHT installations terminated from BESCOM and considered as a Deemed Distribution Licensee**

The South Western Railway, Bangalore are availing 33 MWs, Long Term Open Access (LTOA )power supply from M/sRatnagiri Power Plant Limited (RGPPL) for railway tractions located at Whitefield, Someshwara, Bagarpet, Bidadi and Rail Wheel Factory, Yelahanka and terminated from BESCOM and to reconnect with BESCOM/KPTCL as 'Deemed Distribution Licensee'.

As per CERC "All concerned RLDCs, State Transmission Utilities and SLDCs are directed to facilitate long term Open Access and Medium Term Access in terms of Connectivity Regulations from the generating stations or other sources to the facilities and network of Indian Railways".

As per the CERC Order Sl. No. 42, Indian Railways is an authorized entity to distribute and supply electricity in connection with the working of the Railways under the Railway Act. The Railways shall be entitled for grant of Open Access in connection with the working of the Railways as per the provisions applicable to a distribution licensee.

As per the CERC Order Sl.No. 47 it is stated that Indian Railway is a deemed Distribution licensee under third provision of section 14 of IE Act and there is no requirement for declaration to that effect by the Appropriate Commission.

In view of the above, BESCOM had accorded approval for considering termination of following five nos. EHT Installations within BESCOM Jurisdiction and to reconnect with BESCOM/KPTCL as 'Deemed Distribution Licensee' as per the CERC orders 197/MP/2015, dtd: 05.11.2015.

SI No	Name and address of existing Installations	RR No	Allocated Capacity for Importing Power through OA in MWs
1	The Divisional Electrical Eng, Railways Traction, 16127304, EHT/220KV, White Field, Hoody, Bangalore – 560048	E4HT-122	04
2	The Divisional Electrical Engineering Traction, Someshwara, Gowribidanur - 561208	GREHT-1	03
3	M/s Rail Wheel Factory, Puttenahhalli, Yelahanka, Bangalore - 560064	YHT-150	21
4	The Divisional Electrical Engineering, Divisional Railway Manager M/s SW railways, Bagarpet, KGF	BPETHHT-33	04
5	The Divisional Electrical Engineering Traction, Distribution SW Railways, Sy No. 21, Railway Station Bidadi	BDEHT-140	01

In case of failure of supply from M/s RGPPL for Railway Traction and Rail Wheel Factory through long term Open Access has to avail backup supply from BESCOM. In this regard, there is no particular rate of tariff for standby supply from BESCOM, since the 5 nos of EHT installation are considered as Deemed Distribution Licensee and are no more BESCOM Consumers.

In view of above, request Hon'ble KERC to assign new/separate tariff charges in case to South Western Railways & Rail Wheel Factory avail standby supply from BESCOM.