

**BEFORE THE HONOURABLE TAMIL NADU ELECTRICITY REGULATORY  
COMMISSION AT CHENNAI**

M.P. No. 43 of 2012  
and  
I.A. No. 1 and 2 of 2012

**In the matter of :** To direct the respondent to impose only those Restrictions and Control measures which have been specifically approved /sanctioned by this Hon'ble Commission and to equitably distribute such Restriction and Control measures without exempting any class or category of consumers from such Restriction and Control measures.

AND

In the matter of :

Tamil Nadu Electricity Consumers' Association,  
Represented by its President,  
1<sup>st</sup> Floor, SIEMA Building, P.B.No.3847,  
8/4, Race Course, Coimbatore-641018.

.... Petitioner.

-vs-

Tamil Nadu Generation and Distribution  
Corporation Limited (TANGEDCO)  
Represented by its Chairman and Managing Director,  
144, Anna Salai, Chennai-600 002.

.... Respondent

**Additional Counter Affidavit filed on behalf of the Respondent**

I, P. Bagavathiraj S/o. K. Perumal Hindu, aged about 55 years, serving as the Chief Engineer/Commercial, Tamil Nadu Generation and Distribution Corporation Ltd. (TANGEDCO), having office at NPKRR Maaligai, No.144, Anna Salai, Chennai 600 002, do hereby solemnly affirm and sincerely state as follows:

1.0 I am the Chief Engineer/Commercial of the Respondent/TANGEDCO and as such well acquainted with the facts of the case.

2.0 It is respectfully submitted that, as directed by the Hon'ble Commission in order dated 14.12.2012 in the above said petition the following points are submitted regarding equitable distribution of power:

2.1.0 The actual power availability and actual shortage of power in various months in the past and projection for future upto March 2014 are as follows:

Month	Actual Power Availability & Shortage (MU)									
	2008-09		2009-10		2010-11		2011-12		2012-13	
	Availability	Shortage	Availability	Shortage	Availability	Shortage	Availability	Shortage	Availability	Shortage
January	5482	171	5089	850	5853	492	6030	614	5832	1116
February	5502	261	5207	721	6045	477	6071	683	5542	1779
March	5511	777	5993	820	6751	804	6901	789	5886	2242
April	5696	447	5692	767	6606	924	6636	841	5796	2058
May	5984	384	5906	482	5947	784	6503	732	5741	1253
June	6149	240	6363	464	6335	638	6617	598	6802	1090
July	6089	501	6396	424	6492	646	7189	519	7379	710
August	6028	646	6279	524	6349	641	7149	381	6843	1078
September	5472	627	5719	475	6644	544	6539	460	6699	1384
October	5370	772	6656	641	6488	525	6873	701	6642	1658
November	4754	812	5094	489	5492	501	5234	921	5326	1857
December	4670	904	5500	531	5490	553	5817	978	5917	1597
<b>Total</b>	<b>66708</b>	<b>6542</b>	<b>69894</b>	<b>7188</b>	<b>74492</b>	<b>7529</b>	<b>77559</b>	<b>8217</b>	<b>74405</b>	<b>17822</b>

**FORECAST ABSTRACT FOR THE PERIOD FROM JANUARY 2013 TO MARCH 2014**  
(Fig in MW)

Sl. No	SOURCE	Jan - 2013	Feb - 2013	Mar - 2013	Apr - 2013	May - 2013	Jun - 2013	July - 2013	Aug - 2013	Sep - 2013	Oct - 2013	Nov - 2013	Dec - 2013	Jan - 2014	Feb - 2014	Mar - 2014
1	Nett Availability	7200	7970	8180	9260	11020	11696	12110	11895	11685	10275	9425	10290	10861	11515	11640
2	Unrestricted Demand Requirement	11800	12700	12800	12900	13000	13000	12800	12700	12800	12400	12000	12750	12400	13350	13450
3	Deficit	-4600	-4730	-4620	-3640	-1980	-1304	-690	-805	-1115	-2125	-2575	-2460	-1539	-1835	-1810

Note:

1. IPPs are considered full but will be regulated according to Grid condition
2. Generation from new Projects are subject to change.
3. Wind generation is infirm in nature and may change.
4. Hydro generation is subject to the onset of Monsoons.

2.1.1 The proposed plan for additional generation capacity of the ongoing projects and the upcoming new projects upto 2018-19 are given below:

Sl. No	Name of the Scheme	Sector	Capacity ( in MW)	Expected date of commissioning committed by the contractors in the CMD Review on 26.12.12
<b><u>Ongoing Projects</u></b>				
1	Mettur Thermal Power Project - Stage 3 ( MTPP) ( 1x 600 MW)	State	600	January 2013
2	North Chennai Thermal Power Project - Stage-II ( 2x600 MW)	State	1200	Unit-II March 2013 (Full Load) (COD - April 2013) Unit-I Apr 2013(Full Load) (COD- May 2013)
3	NTPC TNEB Joint Venture Project (NTECL) at Vallur (3x 500MW) ( Share 75% )	Joint Venture	1500 (Share-1125)	Unit-I - COD declared on 29.11.2012 Unit-II February 2013 Unit-III October 2013
4	NLC TNEB Joint Venture Project (NTPL) at Tuticorin (2 X 500 MW) (Share 38.7 %)	Joint Venture	1000 (Share 387)	Unit-I September 2013 Unit-II November 2013
Sl. No	Name of the Scheme	Sector	Capacity ( in MW)	Expected date of commissioning

**New Projects**

<b>A</b>	<b><u>Thermal</u></b>			
1	1x660MW Supercritical Ennore Thermal Power Station Expansion Project	State	660	June 2016
2	North Chennai Thermal Power Projects Stage-III (1x800MW)	State	800	Nov 2017
3	North Chennai Thermal Power Projects Stage-IV (2x800MW)	State	1600	Unit-I - June 2017 Unit-II - Dec 2017
4	Uppur Thermal Power Project (2x800 MW)	State	1600	Feb 2019
5	Tuticorin Thermal Power Project ( 1x800 MW)	State	800	Dec 2017
6	Replacement of existing 40 year old ETPS (1x660MW)	State	660	Feb 2019
7	Udangudi Super Critical Thermal Power Project (2x800 MW)	State	1600	Unit-I - May 2017 Unit-II - Nov 2017
8	Udangudi Expansion- Stage-II(1x 800MW)	State	800	May 2018

9	Cheyur UMPP (4000 MW - Share 1600 MW)	UMPP	4000 (Share 1600 MW)	2018-19
<b>B</b>	<b><u>Hydro</u></b>			
1	Kundha Pumped Storage Hydro Electric Project (4x125MW)		500	2015

2.1.2 It is respectfully submitted that, the quantum of energy consumed per day in Chennai and its Suburbs is 19%, Urban 45% and Rural 36%.

2.1.3 If load shedding in Chennai is increased by another one hour during day time, an additional relief of around 100 to 150 MW will be obtained which will reduce only 15 minutes of load shedding duration in other parts of State.

2.1.4 With the present enforcement of 40% power cut to HT – Industrial and Commercial services the total relief expected is about 1500 MVA during day time and about 3000 MVA during evening peak hours (18.00 to 22.00 Hrs.). The daily average consumption for HT – Industrial and Commercial services is about 40 MU/day in which TANGEDCO is supplying about 23 MU and 22 MU is being met out through other sources by HT Industrial and Commercial consumers. Hence, lifting of R&C measures and enforcement of additional Load Shedding is not feasible of compliance at this stage.

2.1.5 It is respectfully submitted that based on the order in W.P.(MD) No.13434 of 2012 of Hon'ble Madurai Bench of Madras High Court; TANGEDCO filed M.P. No.44 of 2012 before this Hon'ble Commission in the matter of equitable power distribution in the State. Similar case filed by Citizens Guardians of Chennai in W.P. No.18740 of 2012 is pending before Hon'ble High Court of Madras. The petition copy filed in W.P. No.18740 of 2012 is already submitted to Hon'ble Commission in the counter affidavit of this M.P. No.43 of 2012.

2.1.6 Since the distribution feeders are connected with assorted type of loads, a schedule for load shedding based on various types of consumers is not feasible at this moment and the same is possible only after segregating the loads which is a well known fact.


2.1.7 About 28 nos. MoU signed consumers in Tamil Nadu are exempted from power cut and their sanctioned demand is 231 MVA. Their consumption during the year 2011-12 is 970 MU and for 2012-13 is 763 MU (upto Dec'2012).

2.1.8 The load factor of the total Tamil Nadu Electricity system are

1. 2007-08 : 84%
  2. 2008-09 : 80%
  3. 2009-10 : 82%
  4. 2010-11 : 80%
  5. 2011-12 : 80%
- and it should be 100% ideally.

3.0 It is respectfully submitted that, in the said back-ground, the power cuts/load shedding has been in place for some time and if the prayer of the petitioner in the above Interlocutory Application is allowed and interim injunction is granted as prayed for, it would further unsettle the power management and it would end in chaos.

4.0 It is respectfully submitted that, a similar Petition in M.P.No.44 of 2012 is pending before this Hon'ble Commission wherein the reasons for minimum load shedding in the City of Chennai is substantiated and thereby on pendency of the above Petition the Petitioner cannot seek an Interim direction in the above Petition. If the above Petition is allowed the Respondent would be put to severe loss and hardship.



Chief Engineer/Commercial  
TANGEDCO  
Anna Salai, Chennai-2

BEFORE ME

Solemnly affirmed at Chennai on this 28<sup>th</sup> day of Jan' 2013 and the deponent has signed his name in my presence.



Advocate 8/1/13

(S. SARAVANAN)  
225, Law Chambers,  
High Court, Chennai-104