

TPSODL/Regulatory /2025/24/705

01-February-25

**Secretary**

Odisha Electricity Regulatory Commission  
Bidyut Niyamak Bhawan  
Plot No 4, Chunokoli  
Shailashree Vihar  
Bhubaneshwar 751021

**Sub:** Additional Submission in the matter for Approval of the Capital Investment Plan for FY 2025-26 to 2031-32 for installation of Smart Meters. (Case No. 102 of 2024)

Ref: Our Office Letter No. TPSODL/Regulatory/2024/60/7935 dated 29.11.24

Dear Sir,

With reference to the above subject, we are submitting additional updated information related to our earlier Application for Approval of Capital Investment Plan for installation of Smart Meters, which has been admitted as Case no. 102 of 2024 by the Hon'ble Commission.

We trust our submissions are in order.

Yours faithfully



(Soumitry Dey)  
**Head-Regulatory**

**TP SOUTHERN ODISHA DISTRIBUTION LIMITED**

(A Joint Venture of Tata Power and Government of Odisha)

Regd./Corp Office: Kamapalli, Courtpetta, Berhampur, Ganjam, Odisha – 760 004

Website: [www.tpsouthernodisha.com](http://www.tpsouthernodisha.com) Email: [tpodl@tpsouthernodisha.com](mailto:tpodl@tpsouthernodisha.com)

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION,  
BIDYUT NIYAMAK BHAWAN.  
PLOT No-4, CHUNOKOLI, SHAILASHREE VIHAR, BHUBANESWAR-751021

Case No. 102 of 2024

IN THE MATTER OF: Additional Submission- Application for approval of Capital Investment Plan for installation of Smart Meters for the FY 2025-26 to 2031-32 in the Licensed Area of TP Southern Odisha Distribution Ltd.



And

IN THE MATTER OF: TP Southern Odisha Distribution Ltd., Corp Office, Kamapalli, Courtpeta, Berhampur, Ganjam, Odisha - 760004.

... Petitioner

IN THE MATTER OF: M/s GRIDCO, OPTCL, SLDC, Department of Energy, Govt. of Odisha and All Concerned Stakeholders.

... Respondents

P.C. PATNAIK  
NOTARY  
BERHAMPUR (GM.)  
No. A-463  
Time 11:11 AM/PM  
Date 1-2-2025

AFFIDAVIT

I Soumitry Dey, aged about 47 years, s/o. Late Banshidhar Dey, working as the Head Regulatory Affairs, do hereby solemnly affirm and state as follows:

- a) That, I am working as Head Regulatory Affairs of TPSODL, Courtpeta, Berhampur, Dist. - Ganjam-760004. I am the authorized representative in the above matter and duly authorized by the said applicant to make this affidavit on its behalf.
- b) That, I have gone through the contentions in this submission and understood the contents thereof.
- c) That, the facts stated in the application are true to the best my knowledge and belief.

Identified by  
  
Advocate

  
Deponent

Verified that the contents of above affidavit are true and correct, no part it is false and nothing material has been concealed there-from.

Verified at ..... he Declarant having been identified by ..... on this 12 day of Feb 2025

Solely affirmed before me on this .....  
the 12 Day of Feb 2025  
11-10 AM/PM Contents having been  
to adover & explained the declarant who  
seemed to have profctly understood the  
contents of the there of moving the affidavit

  
Deponent

1-2-2025  
NOTARY  
Berhampur (Gm.) Odisha

BEFORE THE ODISHA ELECTRICITY REGULATORY COMMISSION,  
BIDYUT NIYAMAK BHAWAN.  
PLOT No-4, CHUNOKOLI, SHAILASHREE VIHAR, BHUBANESWAR-751021

Case No: 102/2024

IN THE MATTER OF: **Additional Submission:** - Application for approval of Capital Investment Plan for installation of Smart Meters for the FY 2025-26 to 2031-32 in the Licensed Area of TP Southern Odisha Distribution Ltd.

*And*

IN THE MATTER OF: TP Southern Odisha Distribution Ltd., Corp Office, Kamapalli, Courtpeta, Berhampur, Ganjam, Odisha - 760004.

.... *Petitioner*

IN THE MATTER OF: M/s GRIDCO, OPTCL, SLDC, Department of Energy, Govt. of Odisha and All Concerned Stakeholders.

.... *Respondents*

Most Respectfully Sheweth,

1. The above petition was filed by the petitioner vide submission dated 29<sup>th</sup> November 2024.
2. In compliance to the directive of the Hon'ble Commission given in letter Case No. 102/2024/1523, dated 20th December 2024, the petitioner has published the public notice in newspapers on 21st December 2024.
3. The proof of the publication has been submitted to the Hon'ble Commission vide letter TPSODL/Regulatory/2024/69/8387 dated 21st December 2024.
4. Following additional submissions in the above case matter is being submitted by the petitioner for kind consideration of the Hon'ble Commission.



**TPSDOL Additional Submission**

5. The Hon'ble Commission vide Notification No. OERC -Engg-92/2003 (Vol-VIII) /Dt. 09.12.2024 has notified standard service connection charges upto 150 kW for new connections.
6. In view of the above development that was notified after submission of our petition, certain portion of our original petition dated 29th November 2024 needs to be revised.
7. In view of the above, Table-6, Table-7, Table-9 and Table-10 our petition dated 29th November 2024 stands revised and need to be replaced with followings updated tables.
8. **Revised Table - 6:** Subsequent to the above notification dated 09.12.2024, the meter installation cost for new connection has been removed and the revised table is as provided below.

**Table - 6 (Revised):**  
**Cost of Meters considered for Capital Investment Plan for Meters**

| SL NO  | Meter Type       | UoM      | FY-26  | FY-27  | FY-28  | FY-29  | FY-30  | FY-31  | FY-32  |
|--|------------------|----------|--------|--------|--------|--------|--------|--------|--------|
| <b>A Replacement of Meters by Smart Meters</b> |                  |          |        |        |        |        |        |        |        |
| 1  | Single Phase     | Rs/Meter | 3993   | 3993   | 3993   | 3993   | 3993   | 3993   | 3993   |
| 2  | Three Phase (WC) | Rs/Meter | 7968   | 7968   | 7968   | 7968   | 7968   | 7968   | 7968   |
| 3  | LTCT             | Rs/Meter | 8361   | 8361   | 8361   | 8361   | 8361   | 8361   | 8361   |
| 4  | HT               | Rs/Meter | 31652  | 31652  | 31652  | 31652  | 31652  | 31652  | 31652  |
| <b>B New Connections by Smart Meters</b>       |                  |          |        |        |        |        |        |        |        |
| 1  | Single Phase     | Rs/Meter | 3385   | 3385   | 3385   | 3385   | 3385   | 3385   | 3385   |
| 2  | Three Phase (WC) | Rs/Meter | 6367   | 6367   | 6367   | 6367   | 6367   | 6367   | 6367   |
| 3  | LTCT             | Rs/Meter | 17114  | 17114  | 17114  | 17114  | 17114  | 17114  | 17114  |
| 4  | HT               | Rs/Meter | 123265 | 123265 | 123265 | 123265 | 123265 | 123265 | 123265 |
| <b>B BLE Meters</b>                            |                  |          |        |        |        |        |        |        |        |
| 1  | Single Phase     | Rs/Meter | 1158   | 1158   | 1158   | 0      | 0      | 0      | 0      |

9. **Revised Table - 7:** Subsequent to the above notification dated 09.12.2024, the meter installation cost for new connection has been removed and the revised table is as provided below.



**Table - 7 (Revised):**  
**The detailed break up of Meter Cost- New Connection**

| Sr No             | Particulars   | Units           | Single Phase | Single Phase | Three Phase | LT CT        | HT CT Meter   |
|-------------------|---|-----------------|--------------|--------------|-------------|--------------|---------------|
|                   |   |                 | 1-5 KW       | 1-5 KW       | > 5 KW      | Meter        | 33KV          |
| 1                 | Type of Meter   |                 | Smart        | BLE Meters   | Smart       | Smart        | Smart         |
| 2                 | Meter Cost  | Rs/Meter        | 3367         | 1140         | 6344        | 6160         | 9505          |
| 3                 | Meter Seals   | Rs/Meter        | 18           | 18           | 22.7        | 54.48        | 90.8          |
| 4                 | Meter Box (LTCT(avg cost of 100/5, 200/5 & 400/5) & HT) | Rs/Meter        |              |              |             | 10900        | 1879          |
| 5                 | Metering Unit   | Rs/Meter        |              |              |             |              | 108560        |
| 6                 | Control cable (HT Metering @10mtr per installation)     | Rs/Meter        |              |              |             |              | 3230          |
| 7                 | Employee Costs capitalised                              | Rs/Meter        | 0            | 0            | 0           | 0            | 0             |
| <b>8:sum(1:7)</b> | <b>Total cost of meter installation</b>                 | <b>Rs/Meter</b> | <b>3385</b>  | <b>1158</b>  | <b>6367</b> | <b>17114</b> | <b>123265</b> |

10. Revised Table - 9: Further, the backend infrastructure capital investment cost (per meter cost) revised to mention the correct contingency amount is provided in table below.

**Table - 9 (Revised):**  
**Backend Infrastructure Capital Investment Cost (Per Meter Cost)**

| SL No | DETAILS   | UoM      | Amount        | Remark  |
|-------|---|----------|---------------|---|
| 1     | MDM development & Application Licence   | Rs/Meter | 55.00         | It includes strengthening IT infrastructure of MDM & associated infra cost and integration of Different Modules i.e. SAP, RevP, GIS, Mobile App |
| 2     | Strengthening IT Infrastructure Setup for MDM, Smart Prepaid, Module and SMOC (Smart Metering Operation Centre) | Rs/Meter | 35.00         |   |
| 3     | SAP AMI / FG CIS Licence  | Rs/Meter | 50.00         |   |
| 4     | Contingency (3%)  | Rs/Meter | 4.20          |   |
|       | <b>TOTAL</b>  |          | <b>144.20</b> |   |

11. Revised Table - 10: Consequent to the above changes, the capital investment cost stands revised as provided in table below.

**Table - 10 (Revised):**  
**Capital Investment in Meters**

*In Rs. Crores*

| Sr No | Meter Type                   | FY-26         | FY-27         | FY-28         | FY-29         | FY-30         | FY-31         | FY-32         | Total          |
|-------|------------------------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|----------------|
| 1     | Smart Meters Replacement     | 123.49        | 128.36        | 109.81        | 109.81        | 109.81        | 99.83         | 101.25        | 782.35         |
| 2     | Smart Meters- New Connection | 14.21         | 14.21         | 14.21         | 31.13         | 31.13         | 31.13         | 31.13         | 167.14         |
| 3     | BLE Meters                   | 5.79          | 5.79          | 5.79          | 0.00          | 0.00          | 0.00          | 0.00          | 17.37          |
| 4     | Backend Infrastructure       | 33.45         | 0.00          | 0.00          | 0.00          | 0.00          | 0.00          | 0.00          | 33.45          |
| 5     | <b>Total</b>                 | <b>176.93</b> | <b>148.36</b> | <b>129.80</b> | <b>140.94</b> | <b>140.94</b> | <b>130.96</b> | <b>132.38</b> | <b>1000.31</b> |



**12. Submission of the Petitioner:** While we have removed the meter installation charges for new connections, subsequent the notification dated 09.12.2024; it is submitted that because of implementation of Standard service connection charges there may be cases wherein there may be under recovery of meter installation cost than actuals and in some cases, there may be over recovery also. It is our submission that the net impact on account of both the cases (i.e. under and over recovery) may kindly be allowed to be Trued up in the ARR of the petitioner.

**13. Smart Meter Installation Approach:** While we have submitted our approach for Smart Meter installation and replacement under this proposed capex route at various sections of our original petition (Please refer Para 1.4, 5.3 and 5.4), however for the ease of reference and appreciation of the Hon'ble Commission as well as all stakeholders the same is also summarized below.

- a. All New Connections will be through Smart Meters Only.
- b. Meters that has completed 5 years will be replaced first then moving to lesser old meters. Urban Areas and areas with good communication network will be covered first then moving to other areas.
- c. Tempered, Defective, Burnt and Lost Meters will be replaced with Smart Meters irrespective of their age.
- d. Installation of BLE meters will be limited to ordered quantities only and replacement with Smart meters will happen only after 5 years life.
- e. As already stipulated at Para 5.4 of our original petition (extract reproduced below for ease of reference)

*5.4 As can be seen there are about 19.18 Lakhs Non- Smart Meters in the present population that is required to be replaced with Smart Meters. However, the same will take some time and would be implemented in phased manner. Further, for areas where the communication network is not reliable, the implementation of Smart Meters in these areas would be deferred. The broad plan of replacement of existing Non-Smart meters with Smart Meters is as given below:*

- a. *Three phase Whole (WC) Current Meters would be carried out in FY 2025-26 and FY 2026-27.*
- b. *Installation of LT CT Meters and HT Meters would be carried out in the FY 2025-26.*
- c. *Single Phase Static Meters would be replaced over the period of 7 years i.e. from FY 2025-26 to FY 2031-32*
- d. *For EHT Consumers, there is no plan to install any Smart Meters as ABT meters are already there.*



- f. While the trajectory for Smart Meters installation and replacement given in our petition is based on current estimate and availability of resources, the Hon'ble Commission may kindly allow the petitioner to expedite the installation and replacement activities for benefit of all stakeholders.

**14. Meter Replacement Cost will be capitalized and will not be claimed under R&M and A&G Separately:**

As this proposal is for installation of Smart Meters under Capex route, all associated costs are capital cost and will be capitalized (Table-10 of the petition may kindly be referred to). For the purpose of clarity, it is again reiterated that meter replacement costs will be capitalized and will not be claimed under R&M and A&G separately.

**15. Capital Investment for Backend Information Technology (IT) infrastructure**

At present our backend infrastructure is capable of handling 2 Lakhs Smart Meters only. However, we have planned to install additional 23,10,565 Smart Meters by FY 2031-32 (Please refer to meter installation plan given at Table-5 of the petition). So, for the balance meters we need to design, develop and install the back-end infrastructure so that as and when Smart Meters are installed they are seamlessly integrated to our existing system and start working correctly.

The major component of backend IT infrastructure are outlined below.

- a. Meter Data Management (MDM) System Development and its Application.
- b. Strengthening of IT infrastructure setup for MDM, Smart Prepaid module and Smart Metering Operation Centre (SMOC).
- c. Strengthening of existing IT & associated infrastructure and integration of difference modules i.e. SAP, ReVP, GIS, Mobile App etc.
- d. Purchase of SAP AMI license for integration with our existing SAP ERP System.
- e. This IT infrastructure is essential for smooth operation and data management between Smart Meters and our IT System.
- f. The data from Smart Meters gets accumulated in Head End System



(HES) in raw form and it gets passed on to Meter Data Management (MDM) for processing. The processed data in MDM system goes to SAP ISU/ Operational system for various purpose like Billing, Load data for network design, information to call center about consumer consumption profiles and power supply status, and various consumption related data.

- g. The requirement of Backend IT infrastructure depends upon no of meters and no of consumers using it. The system e.g. HES, MDM, Billing Engine and its integration within themselves and other system of the organization depends on numbers of meters. Further the computation capacity of the system (i.e. hardware) also depends on no of meters and consumers. More no of meters require more license and more no of computation (i.e. hardware).

The detailed justification and explanation on capital investment in backend infrastructure has already been provided in para 5.8 and 5.9 of our petition.

### **Prayers**

TPSODL prays that the Hon'ble Commission may kindly be pleased to:

1. Consider additional submission made in this filing while disposing off the matter.
2. Allow recovery of Meter Cost under Capex i.e. through Retail Supply Tariff instead of monthly Meter Rent.
3. Meter Rent may be abolished from the date of launch of this Scheme for all Consumers.
4. Allow the installation of Smart Meters under the capex route and approve the trajectory of Smart meter installation including expediting the trajectory for benefit of all stakeholders.
5. Allow the Capital Investment Plan for Smart Meter Installation (Hard Cost) for FY 2025- 26 to FY 31-32.
6. Allow Employee Cost and Interest during Construction based on actuals to be capitalized over and above the Capex (Hard Cost).





7. Allow recovery of unrecovered cost of existing meters in the Retail Supply Tariff so that the meter rent for all consumers can be stopped from the date of launch of this scheme.
8. Permit Carrying forward of the unspent Capital Expenditure to subsequent years.
9. The consequential impact of the above proposal may kindly be allowed as per the applicable Regulations.
10. The net impact of Over and Under recovery towards meters installation cost on account of the implementation of standards service connection charges up to 150 kW vide the Hon'ble Commission's notification dated 09.12.2024 may kindly allowed to be Trued up in the ARR of the Petitioner.
11. Permit making additional submission required in this matter.
12. Grant any other relief as deemed fit and proper in the facts and circumstances of the case.
13. Any other direction as the Hon'ble Commission may think appropriate

Berhampur  
01 February 2025



(Soumitry Dey)  
Head-Regulatory

TP Southern Odisha Distribution Ltd.

