

Electricity Consumer Tariff - 2013

Comments of Energy Forum

10/5,1/1, Averihena Road, Kirulapone, Colombo 05, Sri Lanka

Tel: 94115524613; 94112817710

Fax: 94115532188

Email: eforum@sltnet.lk

Web: efsl.lk

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1. Observations on the PUCSL consultation document

1.1 Accounting and reporting arrangements

As the regulator PUCSL need to ensure all the expenses of CEB are true and fair, in order to protect the rights of the electricity consumers.

The 'Condition 8.2 of the Central Dispatch and Merit Order 3(a) & (b)' of the '**Electricity Transmission and Bulk Supply License grant to CEB**' says *"this condition apply for the purpose of ensuring that the Licensee maintains accounting and reporting arrangements which enable separate accounts to be prepared for both the Transmission Business and Bulk Supply and Operations Business and showing the financial affairs of both businesses."* Further the Condition 33:2, says *"that the transmission licensee should enter into agreements with the bulk consumers."*

We wish to know whether the CEB transmission licensee, CEB distribution licensees and the LECO have submitted their annual audits to PUCSL according to this condition. If not, what is the base of the PUCSL conclusion that the CEB expenditure for the year 2012 is transparent and fair? We urge that the PUCSL should not go ahead with any consumer tariff increase unless such reports are submitted, reviewed and found to be precise.

1.2 Merit order for dispatching of generation units

The PUCSL Consultation Document on Proposed Electricity Tariff Revision 2013 says that CEB has only forecasted for 2,828 GWh, where as the PUCSL has forecasted for 3,681 GWh from large hydro plants for the year 2013. As a justification PUCSL pointed out that the CEB forecast of Hydro generation for the month of January 2013 was only 248 GWh, while the actual was 541 GWh. By under estimating the Hydro generation the CEB has planned to meet the demand by purchasing power from 3 oil fired power plants which are already retired.

While agreeing with the PUCSL for making this very important correction to save Rs. 15,000 million, we further like to know whether this erroneous forecast was done by any officer/s of CEB purposely to purchase power from the retired IPP plants while having the capability to generate power from the hydro power and thereby resulting a loss of Rs 15,000 million to the CEB. We wish to request the PUCSL and the Chairman of the CEB to conduct an investigation on this matter and take necessary action against the officials who submitted incorrect data.

This is a matter of power plant dispatch. It is important have a transparent process to make sure that the power plants are dispatched according to the merit to generate power at the least cost. We stress that PUCSL should be able to monitor the dispatch of the generation of the CEB to avoid this nature of corruption.

We wish to draw your attention to the 'Condition 30: Central Dispatch and Merit Order 3 (a) & (b)' of the 'Electricity Transmission and Bulk Supply License grant to CEB'.

"30.3. (a) The Licensee shall develop a methodology approved by the Commission for determination of a merit order for dispatching of generation units.

(b) The Licensee shall operate merit order based on the Approved methodology, on daily basis or any other basis as directed by the Commission, for dispatch of generation units subject to central dispatch.

Further condition 30:11 says *"The Licensee shall, each year, engage an independent auditor, who must be approved by the commission, to undertake an audit of the Licensee's operational planning and dispatch procedures in accordance with audit guidelines issues by the Commission."*

We wish to know whether the CEB has acted according to the above mentioned conditions. If not, the PUCSL should delay the consumer tariff revisions until such conditions are in place.

1.3 Power Purchasing Agreements

About 50% of the total cost of CEB and 60% of the generation cost goes to pay seven Independent Power Producers (IPPs) supplying thermal power. It is important to know how PUCSL monitors the performance of these IPPs. Out of the 7 Thermal IPPs only 2 have obtained licenses from the PUCSL. CEB purchasing power from the remaining 5 IPPs and PUCSL approving the payments for those 5 IPPs are questionable. The purpose of issuing a license is to make sure that the power is purchased at the lowest rate so that there is no additional burden on the consumers. The PUCSL needs to review all these Power Purchase Agreements (PPA) of IPPs, and make sure that the payments made to the IPPs are true and fair.

1.4 Renewable energy tariff

The graph of "Average unit cost" in the PUCSL Consultation document indicates, that the energy purchased from renewable energy private power producers are cheaper than all CEB and IPP oil fired thermal power plants. Having more and more renewable energy will be an advantage in the future due to oil and coal price volatility and the depreciation of the Sri Lankan Rupee. Further the stress on the foreign exchange reserves can be lowered by introducing more and more renewable energy plants into the system. However the CEB has failed to sign any effective power purchase agreement with the private sector in the last 15 months. This was huge set back in the renewable energy sector in Sri Lanka. The refusal of the CEB to implement the renewable tariff enforcement order of the PUCSL should be withdrawn, before making any revision to the consumer tariff.

2. Means for further reducing the cost of supplying electricity

2.1 CEB agreed revenue reduction

The CEB in their submission to the PUCSL, while stating that the total annual cost of CEB as Rs 256 billion, and has proposed only to recover Rs. 222 billion. This is an interesting request made by CEB as it is likely that CEB has other means to bridge this gap of Rs 34 billion even though the CEB has not provided any details in their submission. PUCSL has recognized that the true cost for the year 2013 is not Rs. 256 billion but only Rs. 228 billion. If the CEB has a facility to bridge a gap of Rs. 34 billion then the 2013 revenue requirement of CEB is only Rs. 194 (228-34) billion.

At present consumer tariff rates the CEB revenue in 2013 is estimated as Rs. 173 billion. The revenue needed by the CEB is Rs 194 billion. Accordingly the average tariff increase needed is only 12% and not 27% as proposed by the CEB.

2.2 Other Income of CEB

The CEB submission says that CEB will be generating an income of Rs 4.5 billion from non-core businesses during the year 2013. Even though CEB has taken this amount into account while determining the amount to be charged from the consumers, the PUCSL has not taken this amount into consideration while adjusting the CEB consumer tariff proposal. This will give the CEB an opportunity to use this money for the actions not approved by the PUCSL. The revenue received from new connections during the year is not accurately represented in the CEB submission. The actual 'other income' of the CEB should be corrected as Rs. 11.5 billion. We suggest the PUCSL to take this Rs. 11.5 billion into consideration as a negative cost while fixing the consumer tariff.

2.3 Return on Equity for the CEB assets

The PUCSL has removed the 'depreciation' from the 'generation budget' submitted by the CEB and introduced a 'ROE' of Rs. 1.34 billion, which has resulted a cost reduction of Rs. 5.34 billion per annum. Similarly the ROE provided PUCSL for transmission is Rs. 1.33 billion and distribution is Rs. 4.53 billion.

We wish to inquire the purpose of giving this ROE to the CEB owned assets. This is acceptable if these funds are kept in a separate account to meet the repair costs of power plants and other assets. However the present practice is the Ministry of Power and Energy requesting the full cost from the government for major overhauls and other similar works associated with power plants.

In this context we wish to know for what purpose this allocation is currently being used by the CEB. The revenue CEB get under the ROE should not be utilized for functions not approved by the PUCSL. In this context, as this leads to corrupt and inefficient practices we request the PUCSL to remove the ROE allocated for the CEB assets from the annual expenditure. The total saving from this removal is Rs. 7.19 billion.

2.4 IPP Capacity Charge

We request from Commission to review the CEB Power Purchase Agreements (PPAs) with all thermal IPPs and make sure that the costs are reasonable. There were three separate reports submitted previously by the Central Bank of Sri Lanka (CBSL), Chief Internal Auditor (CIA) of the CEB and a Committee appointed by the Ministry of Power and Energy (MOPE) on the PPAs with IPPs. According to these reports the process of assessing the costs of IPPs is not favorable to the CEB and hence needs to renegotiate.

As per the consultation document of PUCSL, the energy cost of Combined Cycle plants like, West Coast, AES and Kelanitissa (CEB owned) plants are higher or only marginally lower compared to Diesel Engine power plants like Heladhanavi or ACE Power Embilipitiya and their capacity charges are much higher than the diesel engines. Hence, going for Combined Cycle units having high capital costs cannot be justified, since their efficiency is only marginally better than diesel engines and those combined cycle units consume expensive fuel like Diesel or Low Sulphur Furnace Oil, running combined cycle plants are very costly compared to all diesel engine based electricity. These power purchase agreements need to be revisited or renegotiated to give best benefit to the consumers.

The fuel consumption rates/heat rates of these power plants seems to be low compared to international standards; e.g. combine cycle units normally have 50-55% efficiency, while ones procured by CEB has only 42-45% efficiency. This is not acceptable; CEB is honoring all the PPA

conditions while losing heavily on efficiency, and ultimately burdening the poor consumers. Do they really need to pay for it? In terms of Section 5.2.3 of the 'Decision of Electricity Tariff 2011' as published by PUCSL, "*CEB has to test heat rates/ fuel consumption efficiency of thermal plants through independent party*". Has it happened? CEB shall not pass on all their inefficiencies to consumers.

Based on the findings of CBSL, CIA and MOPE reports it is likely that the annual loss of CEB comprised with advanced payments, excess capacity charge payments for non-escalable components and loss due to incorrect estimation of insurance payments is about Rs. 630 million. Has CEB taken any action on this? In addition to these factors it is necessary to review the agreements and other related data and verify that the capital costs used for power purchasing tariff is fair and accurate. Has any independent party checked the heat rates of IPPs? If the figures are not accurate then it is necessary to renegotiate the terms and protect the rights of the CEB and its consumers. Further it is necessary to take disciplinary actions against the CEB officers who were involved in the original negotiations. If CEB fails to submit the templates of such tariff calculations then PUCSL should not approve the payments for those IPPs.

2.5 Financial loss due to coal purchases

The coal purchase for the first 300 MW coal plant in Puttalam was awarded not to the lowest bid due to the incorrect equations used by the Technical Evaluation Committee (TEC), the Cabinet Appointed Procurement Committee (CAPC) and the Project Appeal Board (PAB). The annual loss occurred due to this error is about Rs. 763 million. The equations used should be reviewed and corrected by the PUCSL.

2.6 Addition of new coal power plants

The next two 300 MW coal fired power plants in Puttalam are planned to commission in the end of this year. Accordingly one of the two plants will be commissioned in October and it will be supply power to the national grid thereafter. The energy generated from this plant is likely to replace the energy generated from high cost oil fired power plants and the financial saving from this plant will be about Rs. 3.36 billion. This cost reduction should be taken into consideration while assessing the generation cost of the second half of the year. This saving should also take into account while deciding on the consumer tariff. The tender for purchasing coal for this plant should have awarded in last November. However the relevant authorities have failed to award it up to now. This may lead to a crisis where government will have to purchase coal at exorbitant prices under emergency conditions. The PUCSL need to take necessary actions to avoid this crisis situation before making any electricity consumer tariff revision.

2.7 Impact of depreciation of rupee

The main reason for the increase in cost of generation in the year 2013 is the depreciation of the rupee but not the world oil and coal price increase. Approximately Rs. 25 billion cost increase is resulted due to Sri Lankan Rupee devaluation from 112.97 LKR/USD in December 2011 to 131.50 LKR/USD December 2012. Because of this CPC has decided to increase the price of HFO supplied for power plants from 65 to 90 Rs/l from 1st of April 2013. The additional cost that CEB has to bear due to this change is Rs. 25 billion which is line with the rupee devaluation.

This cost is therefore not due to a weakness in the power sector but due to a weakness of the financial sector decision makers. We suggest the PUCSL to discuss this matter with the Government

and pass this cost back to the General Treasury. This is a possibility as it is likely that Treasury has already agreed to provide a subsidy to the CEB as stated in the 2.1 of this submission. If so then there is no need for the CPC to increase the price of oil supplied to power plants.

2.8 Reducing cost of human resources

The total annual salary cost of CEB is about Rs 15,000 million. The salaries of the CEB employees are relatively higher than the employees of the other similar institutions such as Water Board, Petroleum Corporation and Ports Authority.

Table 2: Salary comparison with other institutions

	Average Salary per person (Rs/Month)
CEB	88,000
CPC	61,000
SLPA	61,000
NWSDB	54,000

Table 3: Salary structure at the CEB

Position	Salary Range		Salary + OT
General Manager	161,400	187,441	187,441
K (Engineers Accountants)	70,640	160,430	160,430
L (ES)	44,663	53,756	75,259
M (Clerks)	33,050	48,656	68,119
N (Labour)	31,688	46,569	74,510
N (Unskilled Labour)	26,944	30,556	48,890

If the CEB salaries are adjusted to the level of CPC and Ports Authority, then CEB total salary cost can be reduced to Rs 10,600 million/y, which will save about Rs 4,700 million/y.

In addition to having higher salaries the payee tax of the employees is also paid by the CEB. Further the pension scheme of the CEB employees is noncontributory. Accordingly the electricity consumers have to pay an annual sum of Rs. 620 million for these payee taxes and pensions.

2.9 Summary of proposed cost reductions

Proposed cost reduction can be summaries as below:

Table 4: Possible Cost Reductions

2013	CEB Submission (LKR Millions)	PUCSL Estimation (LKR Millions)	EF Proposed Deductions (LKR Millions)	Revised Estimation (LKR Millions)
1. Generation cost				
1.1 Capacity Charge	39,402.00	30,147.54		27,547.49
IPP- Contracts			1,263.85	
CEB- ROE			1,336.20	
1.2 Energy Cost	170,064.00	156,329.47		126,561.06
Loss due to Ex. Rate change			25,642.07	
New coal plant			3,362.86	
Loss due to coal purchase issues			763.48	
2. Transmission cost	8,611.00	8,435.08		7,109.08
CEB- ROE			1,326.00	
3. Distribution cost	31,484.00	29,734.04		19,823.26
CEB- ROE			4,530.00	
Payee & Pension			619.00	
Excess Salary			4,761.78	
Short term debt repayment (premium and interest)	-	3,504.70		3,504.70
4. Over head cost	6,486.00			-
5. Other Revenue			11,500.00	(11,500.00)
Total	256,047.00	228,150.83	48,105.24	173,045.59
Existing Revenue	173,839	31%		0%

In this context there is no need to increase the CEB total revenue.

3. Alternative Tariff structures to meet the cost of power

3.1 CEB Proposal

2013 Consumer Tariff Proposal of the CEB

Category	Sales (GWh)	Total No of Consumers	Revenue (Rs. Millions)		Increase (Rs. Millions)	% increase
			Existing	New		
General Purpose						
General Purpose 1	1,347	589,561	34,537	37,231	2,694	8%
General Purpose 2	995	4,725	27,333	29,671	2,338	9%
General Purpose 3	281	94	7,247	7,579	332	5%
Hotel						

Hotel Purpose 1	3	313	68	78	10	14%
Hotel Purpose 2	153	28	2,629	3,149	520	20%
Hotel Purpose 3	82	13	1,223	1,396	172	14%
Industrial						
Industrial Purpose 1	320	53,452	4,019	4,784	765	19%
Industrial Purpose 2	1,953	4,350	29,861	33,430	3,569	12%
Industrial Purpose 3	1,424	314	20,121	21,958	1,837	9%
Domestic	4,161	5,000,401	50,700	84,987	34,287	68%
Religious	66	34,402	320	308	(12)	(4%)
Total			172,659	219,171	46,511	27%

The CEB has proposed to increase the overall revenue by 27% whereas the GP-3 category tariff is proposed to increase only by 5%. The domestic sector overall tariff is proposed to increase by 68%. The CEB however has not given a justification for this different rate increases in tariff for different sectors.

We believe that the existing tariff pattern is reasonable as it reflects the relative importance of each sector and therefore it is not fair to change this pattern unless otherwise there is a reasonable justification for such a change. Accordingly we propose a similar percentage increase to all sectors.

The CEB has proposed a completely different methodology to calculate the tariff of the domestic sector. This same method was introduced in 2008 and the method proved to be a failure. Further the Supreme Court requested to drop this method and present a tariff according the method generally used by the CEB.

The Supreme Court decision is as follows (SCFR 82/2008):

"Deputy solicitor General tenders to Court the revised tariff proposed by he 1st and 2nd Respondents. The proposed tariff reverts to the scheme of the block system levy operative under the December 2006 tariff revision, which was suggested by the Court. In the circumstances the proposed revision grants considerable relief to the 'lower end' consumers. Having considered the submissions of the counsel we direct the 1st and 2nd Respondents to publish the proposed tariff as the tariff that will be applicable from 1.11.2008 in respect of all sectors. The 1st Respondent would also publish a suitable notification in the press to indicate the relief that is given to the domestic, religious and charitable institution consumers.

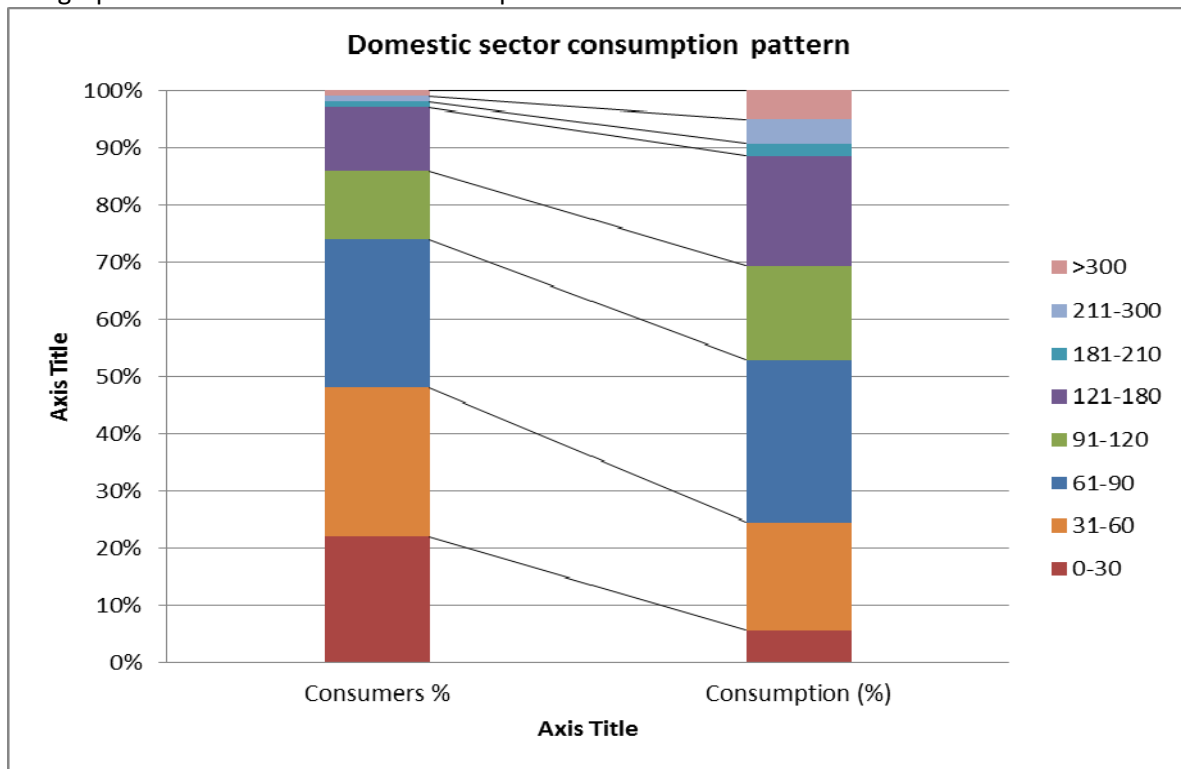
The proposal made by the Interventient Petitioner based on a unit by unit levy is a complete departure from the systems that have been used and should be considered by the Ceylon Electricity Board for any further revision."

In this context the CEB and PUCSL have no right to reverse this court decision.

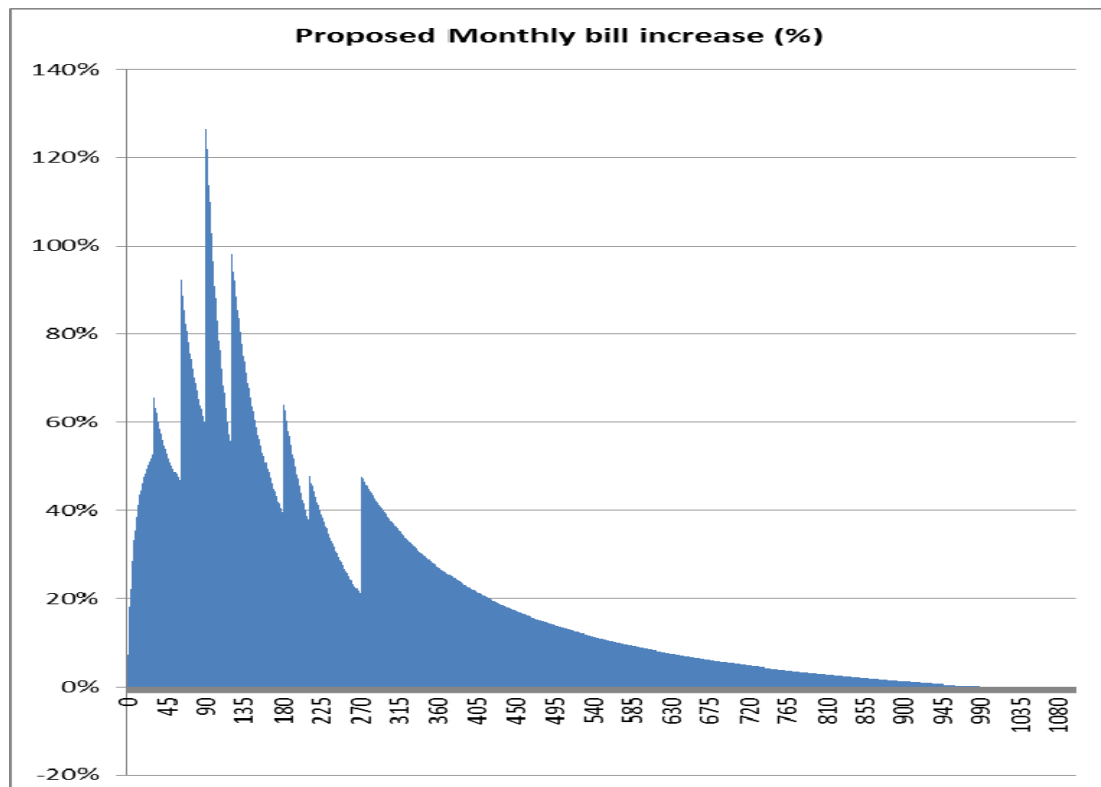
The Energy Forum which was the intervenient Petitioner of the above mentioned case is providing herewith a comment on the CEB proposed method and two alternatives for PUCSL to consider.

3.2 Comment on the CEB domestic sector proposal (CEB-1)

The graph below shows how the consumption is distributed in the domestic sector.

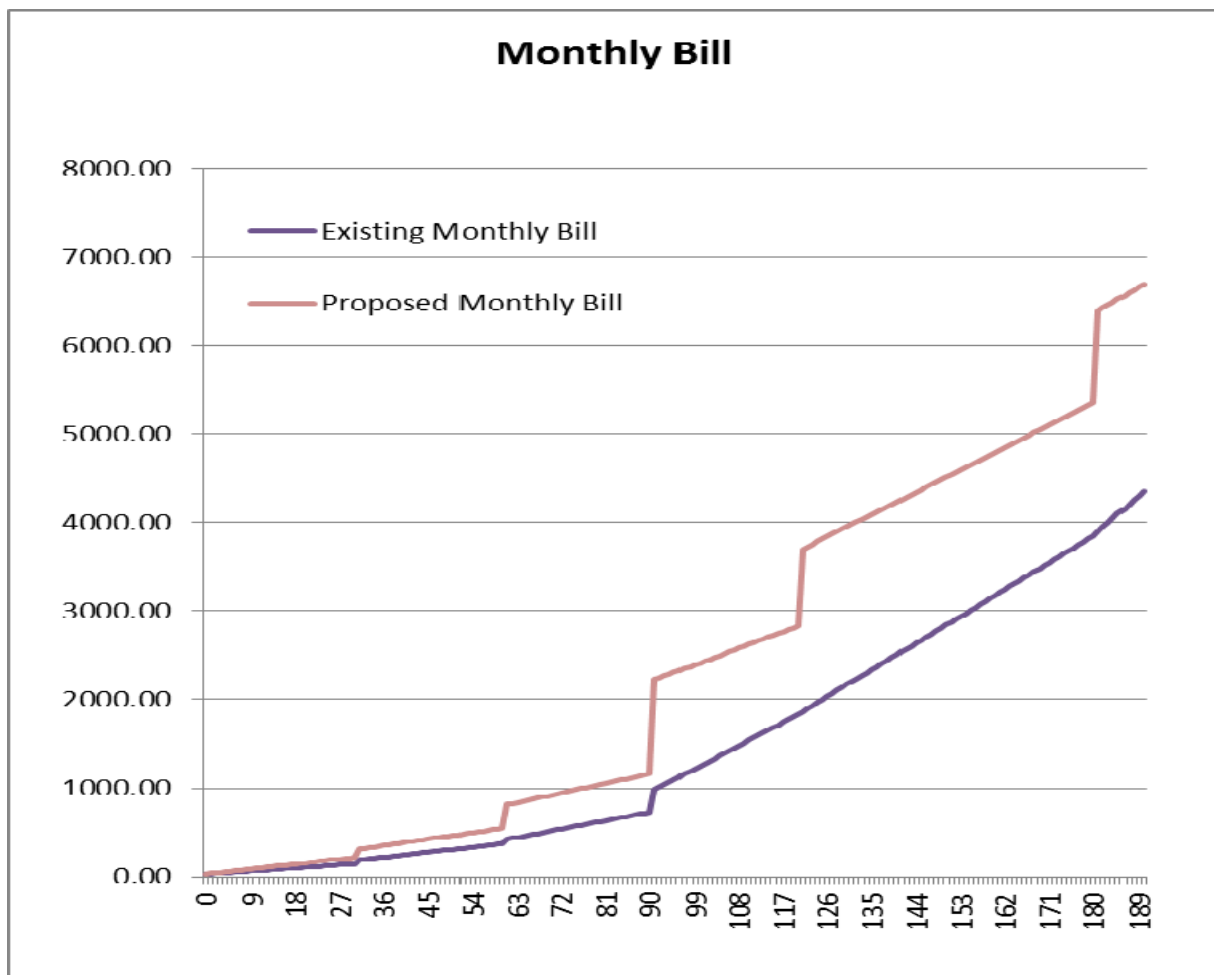


The graph below shows how the CEB propose to increase the monthly bill of the domestic sector.



The above graph shows that the overall tariff in the domestic sector is increased by 68%; however the tariff of the high end consumers is reduced. Further the monthly bill increase of the consumers consuming 91 units per month is 126%. This implies that the monthly bill increase is more than doubled. Further it is interesting to note that certain electricity consumers have to pay more than Rs 1000 for one incremental unit. The table below shows this.

Monthly unit consumption	Existing Monthly Bill	Proposed Monthly Bill	Cost of an incremental unit
30	142.50	217.50	
31	187.85	311.10	93.60
60	371.85	546.00	
61	423.90	815.90	269.90
90	728.40	1161.00	
91	982.80	2226.00	1065.00
120	1835.40	2835.00	
121	1869.00	3703.00	868.00



This sudden jump in the bill is the major weakness in the CEB proposed method of tariff calculation. This was the main reason for the court decision of reverting back to the original method in 2008.

Hence the PUCSL should not agree with the CEB proposed method. Any increase in tariff should be based on one of the following two methods.

3.3 Basic Principles of Alternative Proposals

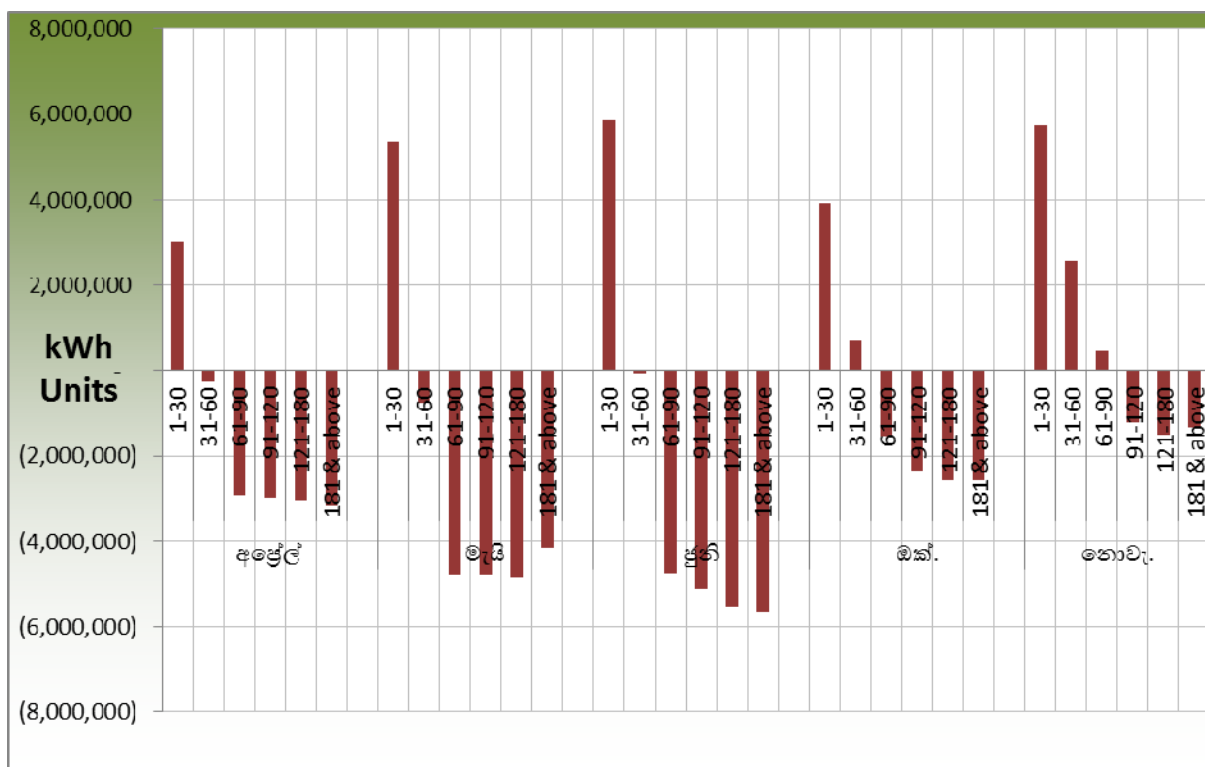
There are two factors need to be considered while determining the electricity tariff.

1. Affordability
2. The cost of generation and delivery

1. Affordability

The PUCSL 'Study on Requirements of Prospective Electricity Consumers and Fuel (electricity) Poverty & Affordability' conducted in 2010 gives a clear indication on the affordability aspect of the consumers. It says that "on average electricity bill is 7% of food expenditure and nearly 43% of education expenditure. The same shares for the poorest category show that the electricity bill is 19% of their food expenditure and the electricity expenditure is as twice as education expenditure. This indicates that the poorer segments of the society are facing a severe constraint on electricity consumption." Further report says "considering all the literature reviewed and empirical findings of this study, this report suggests that at least 12kWhs per-person per month should be considered as basic need".

These findings are in line with the CEB experience with the energy conservation program. During the electricity price increase in Feb 2012 Ministry of Power and Energy introduced the "Today for Tomorrow" energy conservation program and the end result presented by the CEB is as the following graph.



Only the consumers consuming less than 90 units per month have responded to this price increase and conservation campaign. On the other hand it is clear that high-end consumers can afford to pay

a higher tariff to maintain their luxury lifestyles. Assuming a family of 5, average basic electricity need is about 60 units per month and the CEB should give priority and make sure that this need is met using less expensive power plants.

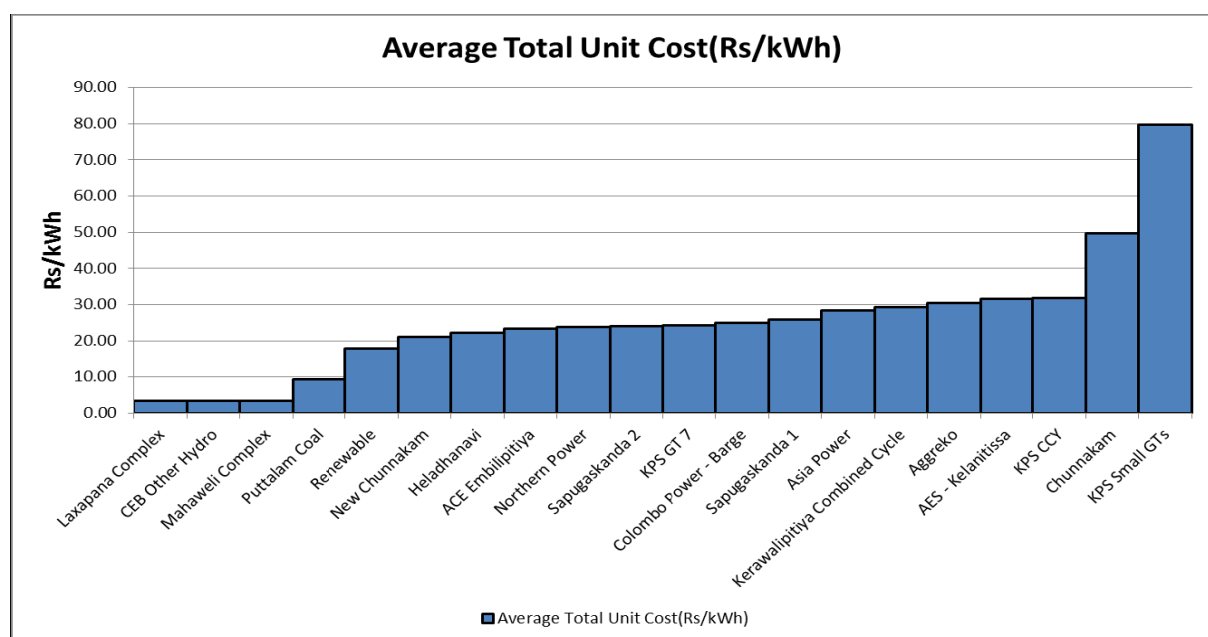
Findings of the PUCSL study show that 42 percent of the households consume less than the minimum requirement. When the un-electrified households are also added to this the electricity poverty incident of Sri Lanka closes to 50 percent, and thereby nearly half of Sri Lankan households do not have access to minimum electricity requirement for a decent life standard.

Relative poverty of electricity is also examined and observed that the entire electricity supply (for households) is dominated by the high end consumers. Findings of this study show that the households at the low end (the lowest 10%) consume only 2 percent of total electricity availability for domestic users whereas the top 10 percent consume 27 percent of it. This shows very high disparity in electricity consumption. This suggests that the majority of electricity consumers under-consume it and the richest 10 percent over-consume the facility. In future policy discussions this needs to be considered.

It is important to seriously consider these findings of the PUCSL survey while increasing the electricity tariff.

2. The cost of generation and delivery

Both the PUCSL consultation document and CEB submission have mentioned about a subsidy given to low-end consumers. This is a misinterpretation of the actual situation. Let us assume a case where high-end consumers increase their consumption and consume about 100 GWh additional units per month. Then the so-called subsidy given to the low-end increases as the generation from expensive plants is increased. That implies that the subsidy amount given to low-end consumers is not depending on the monthly units consumed by low-end consumers but on the consumption of the high-end consumers. The mistake made by the CEB and PUCSL while determining the subsidy is that they have considered the average cost of a unit as the basis for subsidy calculation. This is a scientifically incorrect method to determine the subsidy as the generating cost of power plants differ.



Cost of generation: of a hydro power unit is about Rs. 0.50; of a coal unit is about Rs. 9; of a renewable energy unit is about Rs. 18; of a Heavy Fuel Oil unit is about Rs 20 and of a Diesel unit is between Rs. 30 and 80.

The electricity per se is not a basic need but it depends on the appliances used by a particular consumer. As suggested by the PUCSL report, priority should be given to catering to lighting, viewing a TV and ironing needs.

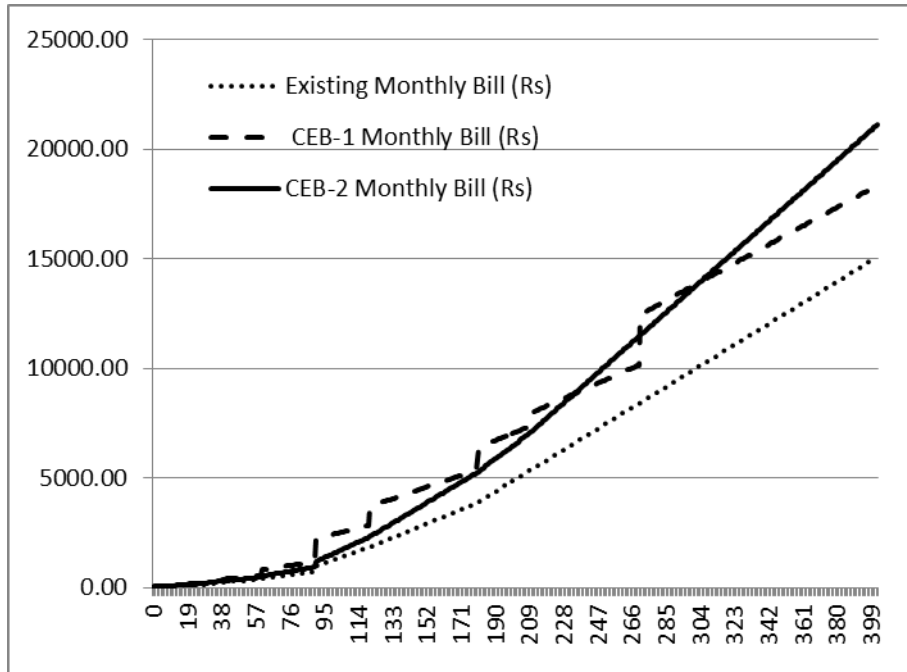
Block	No. of Consumers	Consumers %	Cumulative consumers %	Sales (GWh/y)	Cumulative consumption (GWh)	% Cumulative Consumption
0-30	1,111,125	22%	22%	230	230	6%
31-60	1,318,755	26%	49%	792	1022	25%
61-90	1,299,301	26%	75%	1181	2203	53%
91-120	606,926	12%	87%	683	2886	69%
121-180	534,062	11%	97%	799	3685	89%
181-210	40,000	1%	98%	90	3775	91%
211-300	60,883	1%	99%	180	3955	95%
>300	29,349	1%	100%	206	4161	100%
Total	5,000,401			4161		

The above table shows that the total number of units consumed by the 0-30 category is only 230 GWh/y. The total estimated hydro generation during the year 2013 is 3,681 GWh and accordingly the domestic sector hydro allocation can be estimated as 1470 GWh/y. Therefore the electricity need of less than 60 unit categories (1022 GWh) can be met only from hydro power. The maximum unit cost of a delivered unit of hydro unit (considering capital, O&M costs, transmission and distribution costs and losses) is only about Rs. 4.50 however the minimum unit price they pay for electricity at the 2012 rates is Rs. 4.75. With the proposed tariff revision the unit price of low end consumers will be increased to about Rs. 9. Therefore the lower-end consumers up to 60 units are not subsidized but they pay more to the CEB for it to subsidize the high-end consumers.

A similar approach can be made to the other consumer groups as well. The delivered price of a coal power unit is about Rs. 13 and the annual generation of coal power estimated for 2013 is about 1800 GWh. The domestic sector component of it can be considered as 730 GWh. The balance hydro units (450 GWh) and these coal power units (730 GWh) are adequate to cater to the demand of the 60-90 category electricity consumption of 1181 GWh.

3.4 Alternative Proposal 1 (CEB-2)

It is possible achieve the same revenue targets using the method currently used by the CEB.



3.5 Alternative Proposal 2 (EF-1)

The current tariff structure has 3 components fixed rate, energy rate and FAC. It is better to drop the fixed cost and consider the unit cost of the capacity charge. Then the energy cost and capacity charge can be combined and represent as a single unit.

Accordingly following basic equation can be used for calculating the monthly electricity bill.

$$\text{Monthly Bill} = an^2$$

where

n- no. of units consumed per month

a - constants which can be varied to collect the expected CEB revenue.

With this formula the unit rate will increase gradually with the increasing monthly consumption.

If necessary this formula can be applied differently for different categories. Say for example that we need to increase the tariff by a higher percentage for consumers consume more than 90 units per month. Then we can use the formula as follows

As an example

Part 1- Monthly bill = $0.07 \times n^2$ (for the consumers consuming less than or equal 90 units per month)

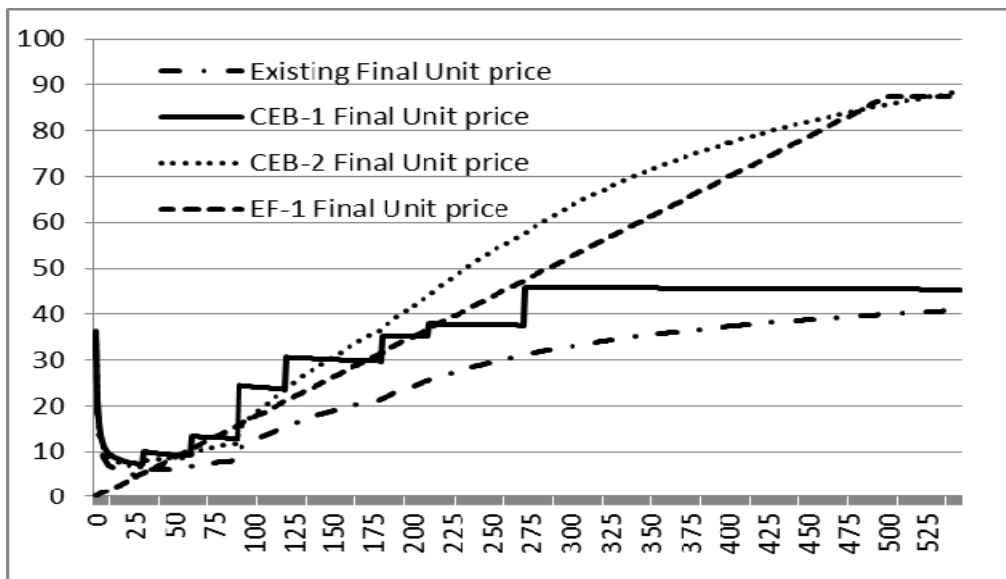
Part 2 - Monthly bill = $0.115 \times n^2 - 300$ (for the consumers consuming more than 90 units per month)

3.6 Comparison of the three options

If CEB wants to increase the domestic revenue by 68%, that can be done using any the two alternative methods.

	Existing			CEB-1				CEB-2				EF-1
	Unit	FAC %	Fix	Unit	FAC %	Fix	Total revenue	Unit	FAC %	Fix	Total Revenue	a=0.175 an ²
0-30	3.00	25	30	5.00	25	30	1,834	4.50	25	30	10405	
31-60	4.70	35	60	6.00	35	60	7,367	7.00	35	60	13018	
61-90	7.50	40	90	8.50	40	90	15,463	12.00	40	90	13224	
91-120	21.00	40	315	15.00	40	315	16,641	36.00	40	315	15743	
121-150	24.00	40	315	20.00	40	315		42.00	40	315		
151-180	24.00	40	315	20.00	40	315	24,386	48.00	40	315	10320	
181-210	36.00	40	315	24.00	40	315	3,175	62.00	40	315	3283	
211-240	36.00	40	315	26.00	40	315	6,782	75.00	40	315	4130	
241-270	36.00	40	315	26.00	40	315		75.00	40	315		
271-300	36.00	40	315	32.00	40	315	9,340	85.00	40	315	14566	
301-330	36.00	40	315	32.00	40	315		85.00	40	315		
331-360	36.00	40	315	32.00	40	315		85.00	40	315		
361-390	36.00	40	315	32.00	40	315		85.00	40	315		
391-600	36.00	40	315	32.00	40	315		85.00	40	315		
Total Re	51,000						84,987				84,691	84,411

Comparison of average unit price



Comparison of electricity bill % increases

