

BEFORE THE HARYANA ELECTRICITY REGULATORY COMMISSION AT PANCHKULA

Case No. HERC/Petition No. 83 of 2025

Date of Hearing : 20.08.2026
Date of Order : 26.08.2026

In the Matter of

Petition under Section 86(c), (i) and (k) of the Electricity Act, 2003 read with Regulations 80 to 82, 84 and 86 of the Haryana Electricity Regulatory Commission (Terms and Conditions for Determination of Tariff for Generation, Transmission, Wheeling and Distribution & Retail Supply under Multi Year Tariff Framework) Regulations, 2024 ("MYT Regulations, 2024") seeking necessary directions for relaxation/ appropriate amendment(s) and/or removal of difficulty in the implementation of Regulation 47.4 of the MYT Regulations, 2024 by the Petitioner-Transmission Licensee.

Petitioner

Haryana Vidyut Prasaran Nigam Ltd. (HVPNL) through its Managing Director

Respondent

Nil

Present on behalf of the Petitioner

1. Mr. Raghujeet Madaan, Advocate
2. Ms. Aerika Singh, Advocate
3. Mr. Lovepreet Singh, Advocate
4. Mr. Akshit, Aggarwal, Advocate
5. Mr. Gaurav Singhal, AEE, HVPNL
6. Mr. Sunny, AEE, HVPNL

Quorum

Shri Mukesh Garg
Shri Shiv Kumar

Officiating Chairman
Member

ORDER

Brief Background of the case

1. The present petition has been filed by HVPNL under Section 86(c), (i) and (k) of the Electricity Act, 2003 read with Regulations 80 to 82, 84 and 86 of the Haryana Electricity Regulatory Commission (Terms and Conditions for Determination of Tariff for Generation, Transmission, Wheeling and Distribution & Retail Supply under Multi Year Tariff Framework) Regulations, 2024 ("MYT Regulations, 2024") seeking necessary directions for relaxation/ appropriate amendment(s) and/or removal of difficulty in the implementation of Regulation 47.4 of the MYT Regulations, 2024.
2. **Petitioner's submissions: -**
The petitioner has submitted as under: -
 - 2.1 That Regulation 47.4 of the MYT Regulations, 2024 is reproduced below for ready reference:
"47.4. Transmission losses (%)

- a) *The trajectory for, intra-state transmission loss, during the control period shall be as under:*

<i>FY 2025-26</i>	<i>FY 2026-27</i>	<i>FY 2027-28</i>	<i>FY 2028-29</i>	<i>FY 2029-30</i>
<i>1.95%</i>	<i>1.94%</i>	<i>1.93%</i>	<i>1.92%</i>	<i>1.91%</i>

- b) *The losses shall be borne by the beneficiaries in kind. The SLDC shall reduce the demand scheduled by the beneficiaries during each time block by the 12 months rolling transmission losses (the said period will be the 12 months period preceding the relevant month by 3 months). The SLDC shall post the rolling 12 months losses regularly on its website. The SLDC, however, shall develop necessary software for working out rolling 52-week losses and reduce the scheduled demand accordingly thereafter.*
- c) *If the actual annual transmission losses (%) exceed the bench mark value (%) approved by the Commission, the licensee(s) shall be penalized in the following manner:*

<i>Percentage increase above the Loss level specified by the Commission</i>	<i>Penalty</i>
<i>Upto 5%</i>	<i>No Penalty</i>
<i>More than 5% and upto 10%</i>	<i>Reduction in return on equity in Rs. crore by 0.5 %</i>
<i>More than 10% and upto 15%</i>	<i>Reduction in return on equity in Rs. crore by 1%</i>
<i>More than 15%</i>	<i>Reduction in return on equity in Rs. Crore by 1% + 0.5% for every increase of 5% or part thereof above 15%</i>

Example: In case the specified transmission loss level is 3%, then an increase of 0.15 in the loss level will amount to 5% increase. Similarly, an increase of 0.30 and 0.45 in the loss level will amount to 10% and 15% increase in the loss level respectively. Provided, further that the intra-State transmission loss, in excess of the benchmark specified in these Regulations shall not be passed on to the beneficiaries/ electricity consumers.”

- 2.2 That the Petitioner herein is seeking removal of difficulty as regards implementation of the aforesaid regulation/relaxation of the above-mentioned clarification or appropriate amendment/modification of the aforesaid Regulations, fixing a benchmark trajectory for intra-state transmission losses and thereafter prescribing a penalty, in case the transmission losses exceed the said benchmark value, as deemed appropriate by the Hon’ble Commission.
- 2.3 That transmission losses in an electrical network are fundamentally unavoidable due to the inherent physical properties of the materials and components used in the transmission system. These losses are governed by well-established electrical engineering principles and cannot be eliminated and/or reduced beyond a limit by managerial or operational efforts alone. The major contributors to transmission losses include:-

- i. Resistive (I^2R) Losses- Being the power loss in conductors and equipment due to resistance as electrical current flows through transmission lines and transformers.
- ii. Dielectric Losses: Being the energy loss occurring in the insulation materials of cables and transformers due to electric field stresses.
- iii. Corona Discharge Losses: Being the energy dissipated as a result of ionization of air around high-voltage conductors, especially in adverse atmospheric conditions.
- iv. Magnetic Hysteresis and Eddy Current Losses: Being the losses in transformer cores caused by magnetization cycles and circulating currents induced in conductive parts.

Despite adopting the best available technologies, modern materials, and optimized system design practices, these losses persist at a fundamental level. The practical minimum achievable intra-state transmission loss is approximately 2% of total power transmitted, based on global and Indian transmission industry experience.

2.4 That transmission losses in the system are broadly divided into two categories:

- i. No Load Losses (Fixed Losses): These are losses that remain nearly constant, irrespective of the quantum of power transmitted through the system. No load losses primarily include no-load transformer core losses and fixed losses in transmission lines. The no-load losses of power transformers alone are approximately 194.73 LUs per month, which is a significant quantum that Petitioner-HVPNL cannot mitigate by altering load or generation patterns.

Attention of the Hon'ble Commission, is brought towards the following table:

Sr. No.	Transformer ratio	Capacity in MVA	Number of Transformers	No load losses in KW (as per Tech. specifications)	Total No Load Losses in KW	No load energy losses per day (kwh)	No load energy losses in Month (LU)
1	400/220 KV	315	15	86	1290	30960	9.60
2	220/132 KV	160	18	40	720	17280	5.18
3	220/132 KV	100	94	24	2256	54144	16.24
4	220/132 KV	50	2	24	48	1152	0.35
5	220/66 KV	160	21	70	1470	35280	10.58
6	220/66 KV	100	56	44	2464	59136	17.74
7	220/33 KV	100	55	50	2750	66000	19.80
8	132/33 KV	40/50	190	25	4750	114000	34.20
9	132/33 KV	20/25	148	11.5	1702	40848	12.25
10	132/33 KV	16/20	10	11.5	115	2760	0.83
11	132/33 KV	10./16	8	11.5	92	2208	0.66
12	132/33 KV	Ratings up to 31.5	5	11.5	57.5	1380	0.41
13	132/11 KV	16/20	103	14	1442	34608	10.38
14	132/11 KV	10./16	152	14	2128	51072	15.32
15	132/11 KV	Ratings up to 12.5	6	14	84	2016	0.60
16	66/33 KV	up to 25 MVA	11	14	154	3696	1.11
17	66/11 KV	25/31.5	232	15	3480	83520	25.06
18	66/11 KV	16/20	14	14	196	4704	1.41
19	66/11 KV	12.5/1	156	11	1716	41184	12.36

20	66/11 kV	10/12.5	8	11	88	2112	0.63
	TOTAL		1304			648060	194.73

The contribution of these no load losses to total system losses varies from 14% during period of maximum losses to 25% during period of minimum losses during FY 2023-24 clearly demonstrating their inflexible nature.

- ii. Load Losses (Variable Losses): These depend on power flow and vary with the load and generation pattern in the state. However, the Petitioner does not exercise direct control over generation or load dispatch decisions, which are governed by market dynamics, consumer demand, and generation availability.

Thus, the majority of transmission losses, particularly the no-load component, cannot be eliminated/significantly reduced by the Petitioner despite the consistent implementation of good grid management practices.

2.5 That the petitioner has been submitted transmission Losses of other power utilities:

Sr. No.	Name of the Utility	Transmission Infrastructure			Transmission Losses in %
		Transformation Capacity (MVA)	Transmission Line (in CKT KM)	Voltage Level in kV	
1.	Haryana Vidyut Prasaran Nigam Limited	88,631	16,940	400,220,132,66	2.007% (2023-24)
2	Punjab State Power Transmission Corporation	38,922 (2023-24)	12,759 (2023-24)	400,220,132	2.42%
3	Transmission Corporation of Telangana Ltd.	40,978 (01.12.2023)	28,445 (01.12.23)	400,220,132	2.30% (2023-24)
4	Andhra Pradesh Transmission Corporation	90,476 (31.03.2022)	31,665 (31.03.2023)	400,220,132	2.61% (2022-23)
5	Madhya Pradesh Power Transmission Corporation	79,157 (31.12.2023)	41,958 (31.12.23)	400,220,132	2.62% (2023-24)
6	Maharashtra State Electricity Transmission Company	1,38,598 (31.03.2024)	51,518 (31.03.24)	765 kV HVDC, 400,220,132, 110,100,66	3.27% (2023-24)
7	Chhattisgarh State Power Transmission Company	23,409 (31.03.23)	13,820 (31.03.23)	400,220,132	3.17% (2022-23)
8	Karnataka Power Transmission Corporation	30,700 (31.03.23)	41,913 (31.03.23)	220,110,66	2.97% (2023-24)
9	Odisha Power Transmission Corporation	25,344 (31.03.23)	16,029 (31.03.23)	400,220,132	3.12% (2022-23)
10	Rajasthan Rajya Vidyut Prasaran Nigam	92,031 (31.03.23)	42,253 (31.03.23)	765,400,220, 132	4.50% (2023-24)

11	Gujrat Energy Transmission Corporation	147,151 (31.03.2022)	71,934 (31.03.2022)	400,220,132, 66	3.60% (2023-24 Target)
12	Uttar Pradesh Power Transmission Corporation	1,79,763 (as on October 2023)	56,545 (as on October 2023)	400,220,132	3.30% (2022-23)

Thus, HVPNL is already performing far better than most other State Transmission Utilities and is operating at near-best achievable loss levels in the country. As such, imposition of penalty on the Utility which is already performing better in comparison to other similarly placed utility is liable to be revisited. The penalties so fixed are liable to be waived off/ relaxed, as the targets are infeasible to be achieved. There are practical difficulties in achievement of the targets specified under MYT Regulations for the upcoming year.

- 2.6 That the petitioner has submitted that rigid penalty clauses for exceeding fixed loss trajectories have not been mandated by other State Commissions. Infact, most of the states i.e. Punjab, UP, Rajasthan, Himachal Pradesh, Maharashtra, Gujarat, Karnataka, Kerala etc. have also not fixed any loss trajectory. Attention in this regard is brought towards the Regulations adopted by other States Commissions:

i. Gujarat Electricity Regulatory Commission:

The Gujarat Electricity Regulatory Commission (Multi-Year Tariff) Regulations, 2024 prescribes as under:

“75 Transmission losses

75.1 The Commission shall examine the filing made by the Transmission Licensee in respect of transmission loss and shall approve a transmission loss trajectory band with upper and lower limits having $\pm 0.10\%$ variation for each year of the Control Period based on the opening loss levels, licensee's filings/submissions, past trends, objections raised by the stakeholders and any other factor considered relevant by the Commission. This approved loss target will be used for computing estimated energy for transmission in licensee's system for that year.

75.2 There shall be no incentive or penalty in case the actual transmission losses lies within the specified band determined for the year of the Control Period. However, in case the actual transmission loss levels achieved by the Transmission Licensee is deviates on either side of the loss band as provided above, then the Transmission Licensee shall be incentivized or penalized, as the case may be, through variation in the rate of Return on Equity in accordance with Regulation 35 of these Regulations.

75.3 Energy losses in the transmission system of the Transmission Licensee, as determined by the Gujarat State Load Despatch Centre, shall be

borne by the Transmission System Users in proportion to their usage of the Intra-State Transmission System.

Provided that the quantum of energy consumed by the auxiliary equipment of a transmission substation and the station transformer losses within the sub-station shall not be accounted for under the Transmission Losses:

Provided further that the energy consumed for supply of power by the transmission sub-station to the associated offices of the Licensee, its housing colony and other facilities, and for construction works at the sub-station, shall not be considered as energy consumed by the auxiliary equipment of a transmission sub-station:

Provided further that Transmission Licensee shall place the details of energy accounts (weekly/monthly settlements) of all the transmission system users, the month-wise transmission system availability as certified by SLDC, on its website along with the transmission loss for a month, by the end of the succeeding month.”

ii. Punjab State Electricity Regulatory Commission:

Similarly, the PSERC MYT Regulations, 2019 prescribe as under:

“54. TRANSMISSION LOSS

54.1. *The energy losses in the transmission system of the Transmission Licensee, as determined by the State Load Despatch Centre and approved by the Commission, shall be borne by the Transmission. System Users in proportion to their usage of the intra-State transmission system.*

54.2. *The Transmission Licensee shall file the Transmission Loss trajectory in the Business Plan commensurate with the Capital Investment Plan for transmission business. The Commission after verification and evaluation of the same shall fix the Transmission Loss trajectory for each year of the Control Period.*

54.3. *The Commission may stipulate a trajectory for Transmission Loss in accordance with Regulation 4.4 (c) as part of the Multi-Year Tariff framework applicable to the Transmission Licensee: Provided further that any variation between the actual level of Transmission Loss, as determined by the State Load Despatch Centre and the approved level, shall be subject to provisions of Regulation 30: Provided further that any gain/loss sharing with the Transmission Licensee on account of overachievement/under- achievement of the Transmission Loss trajectory specified by the Commission, shall be capped to the Return on Equity earned by the Transmission Licensee for the respective year”*

iii. Uttar Pradesh Electricity Regulatory Commission:

Further, the UPERC MYT Regulations, 2019 prescribe as follows:

“38 Transmission Losses

The energy losses in the Intra-State Transmission System, as determined by the State Load Despatch Centre and approved by the Commission, shall be borne by

the Transmission System Users in proportion to their usage of the Intra-State Transmission System.”

GERC MYT Regulations 2024 specify a banded trajectory approach with permissible variation of $\pm 0.10\%$, and penalties/incentives are only applied outside that band. The PSERC MYT Regulations, 2019 allow filing of transmission loss trajectory along with the business plan, with the Commission determining the trajectory after due evaluation and without rigid penalty clauses. The UPERC MYT Regulations 2019 do not prescribe any trajectory but leave losses to be determined by the SLDC and borne proportionally by system users. CERC does not specify any fixed loss trajectory for the ISTS system.

- 2.7 That the transmission system is planned with the objective to meet the peak demand of the area with a safety margin. Further, the Central Electricity Authority's ("CEA") planning criteria provides for N-1 & N-1-1 contingencies and thus, the system should have redundancy for the outages. In other words, the transmission system in Haryana is designed primarily to meet the peak load demand of the State with necessary redundancy in accordance with the criteria set by the CEA. Transmission planning criteria issued by CEA also does not provide for mandatory year-to-year percentage reduction in the transmission losses as have been prescribed by the Hon'ble Commission. Additionally, the integration of RE generation into the grid leads to further expansion of transmission infrastructure. However, this RE generation is intermittent, and the associated transmission infrastructure is utilized only during specific generation periods.

Further, the load profile in Haryana is uneven- the Southern area (under DHBVNL) peaks from December to March, while the Northern area (under UHBVNL) peaks from July to September. Given this scenario, the transmission system for majority of time runs on average load and/or off peak load while the no load losses are a function of the installed capacity. This Load pattern of DISCOMs lead to higher percentage losses of HVPNL. Thus, the total transmission losses of a system cannot be reduced beyond certain threshold value as the major elements i.e. Transformer and Transmission Lines are standard items with characteristic losses. As such, Regulation 47.4 of the MYT Regulations, 2024 is liable to be relaxed on this ground alone.

- 2.8 That the Hon'ble Commission, vide order dated 22.10.2024 passed in Petition No. 45 of 2024, while considering approval of Regulator 46.4 of the MYT Regulations, forming subject matter of the present Petition, had observed as under –

“The Commission has also taken note of the transmission losses targets for the FY 2022- 23, fixed by Delhi Electricity Regulatory Commission and Uttarakhand Electricity Regulatory Commission at 0.88% and 0.97%, respectively. The Commission is of the considered view that providing achievable loss trajectory in the Regulations is significant as it serves as a benchmark to be achieved. Accordingly, the Commission decides to set the transmission loss trajectory

considering submissions of HVPNL and based upon the past trends at 1.95% for the FY 2025-26 with a reduction of 0.01% for each subsequent year.

In view of the above, Regulation 47.4 (a), shall be read as under: -

FY 2025-26	FY 2026-27	FY 2027-28	FY 2028-29	FY 2029-30
1.95%	1.94%	1.93%	1.92%	1.91%

..” (Emphasis Supplied)

The foregoing observation of the Hon'ble Commission overlooks a material fact to the effect that the transmission infrastructure of the State of Haryana is way substantial as compared to Delhi and Uttarakhand. To elaborate upon the same, a tabular statement containing comparative transmission infrastructure of State of Haryana, UT of Delhi and State of Uttarakhand is provided as under: -

Voltage Level	Haryana	Delhi	Uttarakhand
400/220kV	4660 MVA	5410MVA	1185 MVA
400/220/33kV	-	-	630
220/132kV	12540 MVA	-	3000 MVA
220/66kV	10220 MVA	9300MVA	-
220/33kV	5900 MVA	4500MVA	450 MVA
132kV/132kV	-	-	160MVA
132/33kV	14128 MVA	-	3059.5 MVA
132/11kV	4631.5 MVA	-	-
66/33	231.5 MVA	60 MVA	-
66/11	10586.5 MVA	480 MVA	-
33/11	-	276 MVA	-
Total	62897.5 MVA	20026 MVA	8484.5 MVA

Thus, the transmission losses of the State of Haryana cannot be viewed in comparison to transmission losses of the Delhi and the State of Uttarakhand.

- 2.9 That imposing a strict penalty mechanism under Regulation 47.4 of MYT Regulations, 2024, would be unjust and arbitrary, especially when losses are beyond HVPNL's control. The Regulatory intent of promoting efficiency and consumer benefit is better served by recognizing structural limitations. Additionally, penalizing HVPNL despite these uncontrollable technical and systemic factors violates the basic principle of fairness and regulatory reasonableness.
- 2.10 That the Return on Equity of the State of Haryana is already way lower in comparison to other states. As such, provision with respect to imposition of penalty for not achieving transmission losses as specified in the Regulation 47.4, is way too onerous and will affect the sustainability of the Petitioner. For ready reference the Petitioner is tabulating hereunder a comparative view on RoE of various State/UT, which evinces that the RoE of the Petitioner is much lower and any further reduction on the same will disrupt financial stability of the same.

Sr. No.	Name of State	ROE (return on equity %)
1.	Uttarakhand	15.5% (24-25)

2.	Haryana	10.67% (23-24) and 11% (24-30)
3.	Punjab	15.5% (25-26)
4.	Telangana	14% (25-26)
5.	Andhra Pradesh	14% (24-29)
6.	Karnataka	15.5% (22-23)
7.	Maharashtra	14% (22-25)
8.	Gujarat	13% (25-29)
9.	Rajasthan	14% (25-26)
10.	Delhi	14% (21-22)

2.11 That in view of the abovementioned grounds and reasons, it is humbly submitted that the impugned Regulation 47.4 of the MYT Regulations, 2024 may kindly be relaxed and/or appropriately amended. The Hon'ble Commission has ample power to pass appropriate directions in the present petition in view of the following Regulations:

"81. POWERS TO REMOVE DIFFICULTIES.

If any difficulty arises in giving effect to any of the provisions of these Regulations, the Commission may, by a general or special order, not being inconsistent with the provisions of these Regulations or the Act, do or undertake to do things or direct the generating company or the licensee to do or undertake such things which appear to be necessary or expedient for the purpose of removing the difficulties.

82. POWER TO RELAX

The Commission may in public interest and for reasons to be recorded in writing, relax any of the provision of these Regulations.

84. SAVING OF INHERENT POWERS OF THE COMMISSION

84.1. Nothing in these Regulations shall be deemed to limit or otherwise affect the inherent power of the Commission to make such orders as may be necessary for ends of justice or to protect consumers' interest or to prevent the abuse of the process of the Commission.

84.2. Nothing contained in these Regulations shall limit or otherwise affect the inherent powers of the Commission from adopting a procedure, which is at variance with any of the provisions of these Regulations, if the Commission, in view of the special circumstances of the matter or class of matters and for reasons to be recorded in writing, deems it necessary or expedient to depart from the procedure specified in these Regulations.

84.3. Nothing in these Regulations shall, expressly or by implication, bar the Commission to deal with any matter or exercise any power under the Act for which no Regulations have been framed, and the Commission may deal with such matters, powers and functions in a manner it thinks fit.

86. POWER TO AMEND

The Commission, for reasons to be recorded in writing, may at any time vary, alter or modify any of the provision of these Regulations after following the due process."

2.12 That the following prayers have been made: -

- i. Pass necessary directions for relaxing/ amending/ removal of difficulty in the implementation of Regulation 47.4 of the MYT Regulations, 2024 insofar as it prescribes a benchmark trajectory for intra-state transmission losses as well as the penalty in case the transmission losses exceed the benchmark value;
- ii. In the alternative, the Hon'ble Commission may kindly specify an achievable target range of transmission losses i.e. range of 2.00% to 2.05% for next control period, without imposition of any penalty.
- iii. Pass any other order(s) and or direction(s), which the Hon'ble Commission may deem fit and proper in the facts and circumstances of the case.

Proceedings in the Case

3. The case was initially heard on 17.12.2025. The Commission, vide its ibid dated Interim Order, directed the petitioner to provide the following information/documents: -

- a) Table showing transmission losses of all the States Transmission Utilities, for last five years.
- b) International benchmark of transmission losses.
- c) Performance in terms of transmission losses incurred by the petitioner, during last five years.
- d) Study report to substantiate that transmission losses below 1.95% along with the permitted deviation of 5%, is not achievable.
- e) Resolution of Board of Directors of the petitioner to adopt the fact that transmission losses below 1.95% along with the permitted deviation of 5%, is not achievable.

4. **HVPNL filed its reply dated 11.02.2026, submitting as under: -**

4.1. TRANSMISSION LOSSES OF ALL THE STATES TRANSMISSION UTILITIES, FOR LAST FIVE YEARS:

- a) Loss trajectory specified under MYT Regulations, 2024 is as under: -

FY 2025-26	FY 2026-27	FY 2027-28	FY 2028-29	FY 2029-30
1.95%	1.94%	1.93%	1.92%	1.91%

- b) HVPNL transmission losses range from 1.86% (FY 21-22) to 2.12% (FY 2020-21).
- c) Transmission losses of Delhi, Uttarakhand and HP are lower. However, that they are not strictly comparable with those of Haryana, having regard to the distinct geographical and operational characteristics of these States. Delhi, being a compact and densely populated Union Territory/State with high power drawal and relatively short transmission line lengths, presents a materially different operating environment. Similarly, Uttarakhand and Himachal Pradesh have larger

geographical areas with comparatively lower power drawl and distributed generation patterns, rendering a direct comparison with Haryana inappropriate.

4.2. INTERNATIONAL BENCHMARK OF TRANSMISSION LOSSES:

HVPNL is reviewing international data from sources such as:

- World Bank
- International Energy Agency (IEA)
- International Renewable Energy Agency (IRENA)
- IEEE technical papers

However, HVPNL has requested to grant additional time to comply with the aforesaid direction pertaining to the International Benchmark for Transmission Losses, as immediate compliance within the existing timeframe is not feasible despite bona fide efforts. HVPNL has submitted that grant of further time would neither cause any prejudice nor defeat the purpose of the direction, but would instead enable meaningful and effective compliance.

4.3. PERFORMANCE IN TERMS OF TRANSMISSION LOSSES INCURRED BY THE PETITIONER, DURING LAST FIVE YEARS:-

Financial Year	Losses
2020-21	2.115%
2021-22	1.857%
2022-23	1.93%
2023-24	2.007%
2024-25	1.99%

4.4. STUDY REPORT TO SUBSTANTIATE THAT TRANSMISSION LOSSES BELOW 1.95% ALONG WITH THE PERMITTED DEVIATION OF 5%, IS NOT ACHIEVABLE.

- a) That a comprehensive technical study of the intra-State transmission losses of HVPNL has already been conducted by the Central Electricity Authority (CEA), Government of India, titled "*Study of Intra-State Transmission Losses of Haryana Vidyut Prasaran Nigam Limited (HVPNL)*". The said study utilised PSSE load-flow simulations and examined the HVPNL network up to the 66 kV voltage level under multiple operating scenarios, including:
 - (i) December peak load condition;
 - (ii) December off-peak condition; and
 - (iii) A simulated peak load of 10,982 MW.
- b) Transmission losses in the HVPNL network vary between 1.65% and 2.43% depending on load and system conditions.
- c) Hence, maintaining losses below 1.95% even with permitted deviation of 5%+- consistently is technically difficult even with efficient operation.

4.5. RESOLUTION OF BOARD OF DIRECTORS OF THE PETITIONER TO ADOPT THE FACT THAT TRANSMISSION LOSSES BELOW 1.95% ALONG WITH THE PERMITTED DEVIATION OF 5%, IS NOT ACHIEVABLE:

That the process of taking necessary administrative and procedural steps to comply with the said directions of the Hon'ble Commission is underway. However, owing to the time required for completion of the requisite formalities and approvals, the Petitioner seeks a reasonable extension of time.

4.6. That Regulation 47.4 (a) of MYT Regulations prescribes the trajectory for intra-state transmission losses. Further, as per Regulation 47.4 (c), no penalty has been prescribed in case the Transmission Losses are within the permitted deviation of 5%. For ease, the table showing the trajectory prescribed and 5% deviation limit is as under:

FY	Trajectory Prescribed as per Regulation 47.4(a)	Trajectory with Permitted Deviation of up to 5%
2025-26	1.95%	2.05%
2026-27	1.94%	2.04%
2027-28	1.93%	2.03%
2028-29	1.92%	2.02%
2029-30	1.91%	2.01%

4.7. That prayer has been made to grant extension of time to submit international benchmark data and Board Resolution, as directed by the Commission in its Interim Order.

5. **HVPNL filed its reply dated 11.04.2026, in compliance of Interim Order dated 17.12.2025.**

5.1. That the Petitioner has undertaken an extensive review and search of publicly available international literature and databases, including publications and datasets of the World Bank, International Energy Agency (IEA), reports on Power System Research Indicators of Latin America (PSR), Council of European Energy Regulators (CEER) annual reports, Economic and Social Commission for Asia and the Pacific (ESCAP) report titled "*Assessing Grid Readiness for Power System Transformation in Asia and the Pacific: A Pilot Study, 2025*" etc.

5.2. That the matter was also taken up with Central Electricity Authority (CEA). CEA, vide email dated 13.03.2026 has intimated that no specific information regarding this is available with them.

5.3. That the Council of European Energy Regulators (CEER), being an association of national energy regulatory authorities in Europe, periodically publishes reports analyzing power losses in electricity transmission and distribution networks across European countries with the objective of improving transparency, comparability and regulatory practices related to network losses, had published its *3rd Report on Power Losses* dated 11.02.2025. The relevant part of which is reproduced below:

“As was determined in the previous CEER Reports on Power Losses, their definition is not standardized and can vary from country to country. In most cases, losses are understood to be the difference between the energy flowing into and out of a grid, but there are countries that do not use this approach. The lack of harmonised definitions and rules regarding the components included in losses presents an obstacle to straightforward benchmarking across Europe.”

- 5.4. Further, the study conducted by the Power System Research Indicators of Latin America (PSR) and the study conducted by Economic and Social Commission for Asia and the Pacific (ESCAP) are annexed.
- 5.5. That this Hon'ble Commission may kindly be pleased to grant an extension of 4 weeks to enable the Petitioner to ensure full and proper compliance with the aforesaid directions.
6. The case was further heard on 23.04.2026. The petitioner requested for grant of time of four weeks to file the resolution of Board of Directors to adopt the fact that transmission losses below 1.95% along with the permitted deviation of 5%, is not achievable, as directed in the order dated 17.12.2025.

7. HVPNL filed its reply dated 18.05.2026, in compliance of Interim Orders

- 7.1. That the present submissions are being filed in compliance with the interim order dated 17.12.2025 passed by the Hon'ble Commission, whereby the Petitioner-HVPNL was directed to furnish certain information. The relevant extract of the said order is reproduced hereunder for ready reference:

“2. Upon hearing the case, the Commission directs the petitioner to provide the following information/documents within eight weeks from the date of issue of this order: -

- a) Table showing transmission losses of all the States Transmission Utilities, for last five years.
 - b) International benchmark of transmission losses.
 - c) Performance in terms of transmission losses incurred by the petitioner, during last five years.
 - d) Study report to substantiate that transmission losses below 1.95% along with the permitted deviation of 5%, is not achievable.
 - e) Resolution of Board of Directors of the petitioner to adopt the fact that transmission losses below 1.95% along with the permitted deviation of 5%, is not achievable.”
- 7.2. That the matter was placed before the BoD on 27.04.2026. The BoD, after due deliberation, duly approved and adopted the position that transmission losses below 1.95%, along with the permissible deviation of 5%, may not be achievable.

Commission's Analysis and Order

8. The case was finally heard on 20.08.2026, wherein the counsel present on behalf of the petitioner, i.e. Mr. Raghujeet Singh Madan, briefed the contents of the petition and placed all the documents on record and give a detailed presentation regarding the issue in the present lis.
9. The Commission has carefully examined the submissions made by the Petitioner, the documents placed on record and the information furnished in compliance with the Interim Orders.
10. The Commission observed that the grievance of the Petitioner primarily relates to the feasibility of achieving the transmission loss trajectory prescribed under Regulation 47.4 of the MYT Regulations, 2024 and the consequential financial implications arising therefrom. The Commission further observes that grievance on exactly similar grounds was raised by the petitioner at the time of framing of MYT Regulations, 2019 as well as MYT Regulations, 2024.
11. The relevant extract of the order dated 22.10.2024 (HERC/Petition No. 45 of 2024) is reproduced hereunder:-

"10.2 Regulations no. 47.4: 'Transmission Losses'

The draft Regulations provides as under:-

"a) The trajectory for, intra-state transmission loss, during the control period shall be as under:

<i>FY 2025-26</i>	<i>FY 2026-27</i>	<i>FY 2027-28</i>	<i>FY 2028-29</i>	<i>FY 2029-30</i>
<i>1.95</i>	<i>1.90</i>	<i>1.85</i>	<i>1.83</i>	<i>1.80</i>

b) The losses shall be borne by the beneficiaries in kind. The SLDC shall reduce the demand scheduled by the beneficiaries during each time block by the 12 months rolling transmission losses (the said period will be the 12 months period proceeding the relevant month by 3 months). The SLDC shall post the rolling 12 months losses regularly on its website. The SLDC, however, shall develop necessary software for working out rolling 52-week losses and reduce the scheduled demand accordingly thereafter .

(c) If the actual annual transmission losses (%) exceed the benchmark value (%) approved by the Commission, the licensee(s) shall be penalized in the following manner:

Percentage increase above the Loss level specified by the Commission	Penalty
<i>Upto 5%</i>	<i>No Penalty</i>
<i>More than 5% and upto 10%</i>	<i>Reduction in return on equity in Rs crore by 0.5 %</i>
<i>More than 10% and upto 15%</i>	<i>Reduction in return on equity in Rs crore by 1 %</i>
<i>More than 15%</i>	<i>Reduction in return on equity in Rs Crore by 1% + 0.5% for every increase of 5% or part thereof above 15%</i>

Example: In case the specified transmission loss level is 3%, then an increase of 0.15 in the loss level will amount to 5% increase. Similarly, an increase of 0.30 and 0.45 in the loss level will amount to 10% and 15% increase in the loss level respectively.

Provided, further that the intra-State transmission loss, in excess of the benchmark specified in these Regulations shall not be passed on to the beneficiaries/electricity consumers.”

Comments filed by HVPNL: -

HVPNL has submitted that in electrical transmission systems, certain losses are inherent and unavoidable due to the physical properties of the materials and components involved. These losses primarily include resistive losses in the electrical equipment, known as I^2R losses, which occur as electrical current flows through the transmission system. Additionally, dielectric losses in the insulation materials, corona discharge losses due to high voltage gradients, magnetic hysteresis losses and eddy current losses in transformers contribute to the overall system losses.

Even with advanced materials and optimized design, these losses cannot be entirely eliminated. However, through effective system design and modern engineering practices, they can only be minimized. Typically, for FY 2024-25, the goal is to reduce these losses to a level where they account for no more than 2% of the total power transmitted. This threshold represents the practical lower limit achievable given the current state of technology, ensuring system efficiency while recognizing the unavoidable nature of these fundamental losses.

In transmission system, the losses are mainly categorized in two categories i.e. No load losses (fixed losses) and load losses (variable losses). No load losses almost remain constant irrespective of quantum of energy transmitted through the system. Although, these losses are affected by the voltage and frequency but to the least extent as grid parameters i.e. voltage and frequency have negligible variations.

Further reduction in losses (below 2%) may not be possible as HVPNL has little control over intra-state transmission losses because main factors affecting losses viz. load and generation are not under the control of HVPNL.

Transmission Lines and Power Transformers are two major elements of any Transmission system. Transformers and Transmission Lines are designed with specific losses. No load losses of these elements remain constant in the transmission system irrespective of quantum of energy transmitted. No load losses of Power Transformers installed in HVPNL work out to approx. 194 LUs as detailed below: -

Sr. No.	Transformer ratio	Capacity in MVA	Number of T/Fs	No load losses in KW (as per Tech. Specs.)	Total No Load Losses in KW	No load energy losses per day (kwh)	No load energy losses in month (LUs)

1	400/220 KV	315	15	86	1290	30960	9.60
2	220/132 KV	160	18	40	720	17280	5.18
3	220/132 KV	100	94	24	2256	54144	16.24
4	220/132 KV	50	2	24	48	1152	0.35
5	220/66 KV	160	21	70	1470	35280	10.58
6	220/66 KV	100	56	44	2464	59136	17.74
7	220/33 KV	100	55	50	2750	66000	19.80
8	132/33 KV	40/50	190	25	4750	114000	34.20
9	132/33 KV	20/25	148	11.5	1702	40848	12.25
10	132/33 KV	16/20	10	11.5	115	2760	0.83
11	132/33 KV	10./16	8	11.5	92	2208	0.66
12	132/33 KV	Rating s up to 31.5	5	11.5	57.5	1380	0.41
13	132/11 KV	16/20	103	14	1442	34608	10.38
14	132/11 KV	10./16	152	14	2128	51072	15.32
15	132/11 KV	Rating s up to 12.5	6	14	84	2016	0.60
16	66/33 KV	up to 25 MVA	11	14	154	3696	1.11
17	66/11 KV	25/31.5	232	15	3480	83520	25.06
18	66/11 KV	16/20	14	14	196	4704	1.41
19	66/11 KV	12.5/16	156	11	1716	41184	12.36
20	66/11 KV	10/12.5	8	11	88	2112	0.63
		Total	1304			648060	194.73

Contribution of no load losses of Power Transformers installed in HVPNL system varies from 14% (at maximum loading of system) to 25% (at minimum loading of system) of total losses.

The transmission system is planned with the objective to meet the peak demand of the area with a safety margin. Further, the CEA planning criteria provides for N-1 & N-1-1 contingencies and thus the system should have redundancy for the outages. Transmission planning criteria issued by Central Electricity Authority also does not aim to control/ reduce transmission losses of transmission utilities.

Furtherance, the integration of RE power in the network also causes expansion of the transmission system which is only utilized during the period of RE generation and for majority of time remains partially or underutilized.

In Haryana, the southern part (area under DHBVNL jurisdiction) witnesses peak demand in the period from December to March as compared to the northern area (area under UHBVNL jurisdiction) has peak demand in the period from July to September. Accordingly, the system is not only planned for Haryana peak but also for the peaks to be met at individual locations. Accordingly, the transmission system for majority of time runs on average load and/or off peak load while the no load losses are a function of the installed capacity. This Load pattern of DISCOMs lead to higher percentage losses of HVPNL. Thus, the total transmission losses of a system cannot be reduced beyond certain threshold value as the major elements i.e. Transformer and Transmission Lines are standard items with characteristic losses.

Moreover, considering the scenario of other utilities in terms of transmission losses, HVPNL is still far better, which is evident from the table given below:

Sr. No	Name of Utility	Transmission Infrastructure			Transmission Losses in %
		Transformation capacity (MVA)	Transmission line (in CKT KM)	Voltage Level in kV	
1	Haryana Vidyut Prasaran Nigam Limited	88,631	16,940	400,220,132,66	2.007% (2023-24)
2	Punjab State Power Transmission Corporation	38,922 (2023-24)	12,759 (2023-24)	400,220,132	2.42%
3	Transmission Corporation of Telangana Ltd.	40,978 (01.12.2023)	28,445 (01.12.23)	400,220,132	2.30% (2023-24)
4	Andhra Pradesh Transmission Corporation	90,476 (31.03.2022)	31,665 (31.03.2023)	400,220,132	2.61% (2022-23)
5	Madhya Pradesh Power Transmission Corporation	79,157 (31.12.2023)	41,958 (31.12.23)	400,220,132	2.62% (2023-24)
6	Maharashtra State Electricity Transmission Company	1,38,598 (31.03.2024)	51,518 (31.03.24)	765 kV HVDC, 400,220,132, 110,100,66	3.27% (2023-24)
7	Chhatisgarh State Power Transmission Company	23,409 (31.03.23)	13,820 (31.03.23)	400,220,132	3.17% (2022-23)
8	Karnataka Power Transmission Corporation	30,700 (31.03.23)	41,913 (31.03.23)	220,110,66	2.97% (2023-24)
9	Odisha Power Transmission Corporation	25,344 (31.03.23)	16,029 (31.03.23)	400,220,132	3.12% (2022-23)
10	Rajasthan Rajya Vidyut Prasaran Nigam	92,031 (31.03.23)	42,253 (31.03.23)	765,400,220, 132	4.50% (2023-24)
11	Gujarat Energy Transmission Corporation	147,151 (31.03.2022)	71,934 (31.03.2022)	400,220,132,66	3.60% (2023-24 Target)
12	Uttar Pradesh Power Transmission Corporation	1,79,763 (as on October 2023)	56,545 (as on October 2023)	400,220,132	3.30% (2022-23)

HVPNL has further submitted that CERC has also not specified any loss trajectory of ISTS System. SERCs of most of the states i.e. Punjab, UP, Rajasthan, Himachal Pradesh, Maharashtra, Gujarat, Karnataka, Kerala etc. have also not fixed any loss trajectory. The provisions of MYT Regulations of other States are reproduced below for kind reference of Hon'ble Commission:

1. GERC, MYT Regulations 2024:

a) "75 Transmission losses

75.1 The Commission shall examine the filing made by the Transmission Licensee in respect of transmission loss and shall approve a transmission loss trajectory band with upper and lower limits having $\pm 0.10\%$ variation for each year of the Control Period based on the opening loss levels, licensee's filings/submissions, past trends, objections raised by the stakeholders and any other factor considered relevant by the Commission. This approved loss target will be used for computing estimated energy for transmission in licensee's system for that year.

75.2 *There shall be no incentive or penalty in case the actual transmission losses lies within the specified band determined for the year of the Control Period. However, in case the actual transmission loss levels achieved by the Transmission Licensee is deviates on either side of the loss band as provided above, then the Transmission Licensee shall be incentivized or penalized, as the case may be, through variation in the rate of Return on Equity in accordance with Regulation 35 of these Regulations.*

75.3 *Energy losses in the transmission system of the Transmission Licensee, as determined by the Gujarat State Load Despatch Centre, shall be borne by the Transmission System Users in proportion to their usage of the Intra-State Transmission System.*

2. PSERC, MYT Regulations 2019

“54. TRANSMISSION LOSS

54.1. *The energy losses in the transmission system of the Transmission Licensee, **as determined by the State Load Despatch Centre and approved by the Commission, shall be borne by the Transmission.***

System Users in proportion to their usage of the intra-State transmission system.

54.2. *The Transmission Licensee shall file the Transmission Loss trajectory in the Business Plan commensurate with the Capital Investment Plan for transmission business. The Commission after verification and evaluation of the same shall fix the Transmission Loss trajectory for each year of the Control Period.*

54.3. *The Commission may stipulate a trajectory for Transmission Loss in accordance with Regulation 4.4(c) as part of the Multi-Year Tariff framework applicable to the Transmission Licensee: Provided further that any variation between the actual level of Transmission Loss, as determined by the State Load Despatch Centre and the approved level, shall be subject to provisions of Regulation 30: Provided further that any gain / loss sharing with the Transmission Licensee on account of overachievement / under- achievement of the Transmission Loss trajectory specified by the Commission, shall be capped to the Return on Equity earned by the Transmission Licensee for the respective year”*

3. UPERC, MYT Regulations 2019

“38 Transmission Losses

*The energy losses in the Intra-State Transmission System, **as determined by the State Load Despatch Centre and approved by the Commission,** shall be borne by the*

Transmission System Users in proportion to their usage of the Intra-State Transmission System.”

In view of the above, HVPNL has requested not to specify transmission loss trajectory in MYT Regulations as losses of HVPNL are already among the lowest in the country. Further reduction in transmission losses would not be techno economically viable. Alternatively, the target of transmission losses may be fixed in the range of 2.00% to 2.50% for next control period without any penalty and/or may approve the energy losses in the Intra- State Transmission System, as determined by the State Load Dispatch Centre.

Commission’s view/Decision-

The Commission has examined the suggestion and observes that the similar issue was also discussed, in the order dated 24.10.2019, in the matter of framing of HERC MYT Regulations, 2019. The relevant extract of the order dated 24.10.2019, is reproduced below: -

“6.15 It has been suggested by the intervener that the intra – State transmission loss trajectory as per the draft regulations is stringent and the same should be aligned with the provision of CERC (normative loss of every 50 kM distance) and advice of the Central Electricity Authority.

Commission’s Views / Decision: -

*The Commission observes that the intra – State transmission norms determined by the Commission in the draft regulations begins with 2.15% and ends with 2.0% at the end of the second control period. These benchmarks have been determined by the Commission based on performance in the recent past as well as the fact that the Commission, each year, allows Capex for improving the transmission system. Hence, despite the fact that the quantum of energy handled increases (ref. law of physics) the investments in transmission system improvement ought to get reflected in reduction of transmission losses. **Hence, the Commission finds no merit in the submissions of the intervener on this issue. No change in the loss reduction trajectory, as set out in the draft, is required.”***

The Commission further observes that HVPNL, in its Annual Transmission Tariff Petition for the FY 2024-25, has submitted the actual transmission losses from FY 2014-15 to FY 2023-24 (up to September, 2023), as under: -

Sr. No.	Year	Target Transmission Losses (%)	Actual Transmission Losses (%)
1.	2021-22	2.10	1.857
2.	2022-23	2.05	1.930

3.	2023-24 (up to September, 2023)	2.02	1.936
----	---------------------------------	------	-------

The Commission has also taken note of the transmission losses targets for the FY 2022-23, fixed by Delhi Electricity Regulatory Commission and Uttarakhand Electricity Regulatory Commission at 0.88% and 0.97%, respectively.

The Commission is of the considered view that providing achievable loss trajectory in the Regulations is significant as it serves as a benchmark to be achieved. Accordingly, the Commission decides to set the transmission loss trajectory considering submissions of HVPNL and based upon the past trends at 1.95% for the FY 2025-26 with a reduction of 0.01% for each subsequent year.

In view of the above, Regulation 47.4 (a), shall be read as under: -

a) The trajectory for, intra-state transmission loss, during the control period shall be as under:

<i>FY 2025-26</i>	<i>2026-27</i>	<i>Y 2027-28</i>	<i>Y 2028-29</i>	<i>FY 2029-30</i>
<i>1.95%</i>	<i>1.94%</i>	<i>1.93%</i>	<i>1.92%</i>	<i>1.91%</i>

(Page 23-29 of the Order dated 22.10.2024)

12. From the above, it is apparent that the issues raised by the petitioner in the present petitioner were also raised in petition no. 45 of 2024 and the Commission after considering the issues raised by the petitioner had passed a reasoned order dated 22.10.2024, leading to the notification of HERC MYT Regulations, 2024, having force of law behind it. Now, the petitioner is not allowed to raise the same issues on the pretext of removal of difficulty. In this context, the Commission has examined the provisions of Section 11 of the Code of Civil Procedure, 1908, which provides as under:-

“11. Res judicata.—No Court shall try any suit or issue in which the matter directly and substantially in issue has been directly and substantially in issue in a former suit between the same parties, or between parties under whom they or any of them claim, litigating under the same title, in a Court competent to try such subsequent suit or the suit in which such issue has been subsequently raised, and has been heard and finally decided by such Court.

Explanation III.—The matter above referred to must in the former suit have been alleged by one party and either denied or admitted, expressly or impliedly, by the other.

Explanation IV.—Any matter which might and ought to have been made ground of defence or attack in such former suit shall be deemed to have been a matter directly and substantially in issue in such suit.”

The Commission observes that Section 11 of the CPC (1908) explicitly provides that any issue which has been directly and substantially an issue that has been heard and finally decided on merits by a court of competent jurisdiction cannot be tried again by any Court provided the matter directly and substantially in issue is same between the same parties to the suit.

13. The Commission has also taken note of the judgement of Hon'ble Supreme Court dated 19.10.2022 in Civil Appeal Nos. 7691-7694 of 2022 in the matter of S. Ramachandra Rao vs. S. Nagabhushana Rao and Ors. [2022 (4) RCR (Civil) 675], wherein it was observed that *"This doctrine, it is recognised, is conceived in larger public interest and is founded on equity, justice and good conscience."* Hon'ble APEX court has further cited from the judgment of the case of Lal Chand (dead) by L.Rs. and Ors. v. Radha Krishan: (1977) 2 SCC 88 that *"Section 11, it is long since settled, is not exhaustive and the principle which motivates that section can be extended to cases which do not fall strictly within the letter of the law. The issues involved in the two proceedings are identical, those issues arise as between the same parties and thirdly, the issue now sought to be raised was decided finally by a competent quasi-judicial tribunal."*
14. The principle of 'Res-Judicata' was also applied by Hon'ble Appellate Tribunal for Electricity (APTEL) in its judgement dated 28.12.2014, in Reliance Infrastructure Ltd. Vs. Maharashtra Electricity Regulatory Commission (Appeal No. 267 of 2013), wherein the Hon'ble APTEL held as under:-
"(a) The Appellant has sought the same relief in the petition before the State Commission in the present case No.84 of 2013 as in the case No.109 of 2012. No Appeal was filed against the earlier order in case No.109 of 2012 and it has attained the finality. By the present Appeal, the Appellant is virtually seeking to challenge the earlier order dated 2.1.2013 in case No.109 of 2012 which has attained finality. Principle of Res-judicata will apply in the present case."

In view of the above, the Commission is of the considered view that the doctrine of res-judicata is squarely applicable to the facts of the present case, as provided under Section 11 of the Code of Civil Procedure, 1908 along with the applicable 'Explanations'. The present petition, in substance, seeks a review of the Order dated 22.10.2024, under the guise of an application for 'removal of difficulty'. Such an attempt, being in essence a review of the said Order, is ex facie barred by limitation and is hopelessly time-barred.

15. The Commission further observes that the issue of stringent Intra-State Transmission Losses was also raised by HVPNL during the framing of the HERC MYT Regulations, 2019, wherein the trajectory commenced at 2.15% for FY 2020-21 and progressively reduced to 2% by FY 2024-25. Subsequently, at the time of framing of the HERC MYT Regulations, 2024, HVPNL had submitted that achieving Intra-State Transmission

Losses below 2% was not feasible. However, the Commission notes that the Petitioner has, in fact, achieved Intra-State Transmission Losses below the said benchmark, recording 1.857% in FY 2021-22, 1.93% in FY 2022-23 and 1.99% in FY 2024-25.

16. The Commission is of the considered view that the Annual Revenue Requirement (ARR) proceedings provide an appropriate regulatory framework for examining the actual transmission losses achieved by the Petitioner vis-à-vis the approved trajectory, together with the reasons for any variation, the underlying technical and operational circumstances, and the consequential impact, if any. Such examination shall be undertaken in accordance with the applicable Regulations, including an assessment of the genuineness of the difficulties, if any, claimed by the Petitioner, which shall be duly substantiated and established to the satisfaction of the Commission.
17. In view of the above, the Commission is of the considered view that no separate determination on the prayer for relaxation/amendment of Regulation 47.4 of the MYT Regulations, 2024 is warranted at this stage. The issues raised by the Petitioner, including the transmission loss levels and the consequential implications thereof, shall be considered by the Commission in the ARR proceedings of the Petitioner for the relevant financial year, on the basis of the actual, audited/verified data and the submissions made therein, in accordance with law.
18. Accordingly, the present petition is disposed of with liberty to the Petitioner to raise the issue, if any, pertaining to the relevant year, along with all supporting data and material, in the corresponding ARR proceedings. It is clarified that nothing contained in the present Order shall be construed as an expression of opinion on the merits of the Petitioner's claim, and the Commission shall examine the same independently in the relevant ARR proceedings, in accordance with the applicable provisions of the Electricity Act, 2003 and the MYT Regulations, 2024.
19. It is not out of the place to mention that, while disposing of the relevant yearly ARR proceedings, the Commission may, if considered necessary, exercise its inherent powers to remove any difficulty in allowing the actual Intra-State Transmission Losses, after duly considering the comments, if any, of all stakeholders/beneficiaries.
20. The petition stands disposed of in the above terms.

This order is signed, dated and issued by the Haryana Electricity Regulatory Commission on 26.08.2026.

Date: 26.08.2026
Place: Panchkula

Sd/-
(Shiv Kumar)
Member

Sd/-
(Mukesh Garg)
Officiating Chairman