

Reply to 2nd Information Requirement / Discrepancies/ Data Gaps in the Petition No. 1835 - 2022 dated 8th March, 2022

of

True-Up (FY 2020-21), Annual Performance Review (FY 2021-22), Aggregate Revenue Requirement (FY 2022-23)

of

MVVNL

Tariff Proposal

1. Query No. 118 of the Preliminary Queries sent on 01.04.2022 is as under:

“118. Petitioner has to provide the tariff proposal as per the tariff Rationalization Proposal submitted. Further, accordingly Petitioner need to submit also the revised Rate Schedule for FY 2022-23. This would be in compliance to Regulation 11.3 of UPERC’s Multi Year Tariff for Distribution and Transmission) Regulations, 2019.

Quote

Provided further that the Petition shall be accompanied by a detailed Tariff revision proposal showing category-wise Tariffs and how such revision would meet the gap/ surplus, if any, in the ARR

Unquote”

It is observed that the Petitioner has not submitted any Tariff Proposal. Without the Tariff Proposal, the comments / suggestions / objections of the Stakeholders will not be possible and the exercise of Tariff Determination will not be fruitful without the participation of all the Stakeholders.

2. Without the Tariff Proposal, the State Advisory Committee (SAC) will also not be able to comment on the design and fixation of Tariff and Treatment of Gap.
3. It is again reiterated that the Licensee should submit the Tariff Proposal full cost (without subsidy)- category-wise, sub-category-wise & slab-wise and must be designed to achieve +/- 20% Cross Subsidization and Zero gap.

Reply to point 1 to 3:

The petitioner respectfully submits that slab-wise approved subsidy for subsidized categories is the primary requirement for the design of full cost tariff to maintain the cross-subsidy level $\pm 20\%$ of the average cost of supply. Further, as per the tariff policy 2016; the road map for reduction of cross-subsidy is required and the same may be notified by the Hon’ble Commission as per the proviso detailed below:

“2. For achieving the objective that the tariff progressively reflects the cost of supply of electricity, the Appropriate Commission would notify a roadmap such that tariffs are brought within $\pm 20\%$ of the average cost of supply. The road map would also have intermediate milestones, based on the approach of a gradual reduction in cross subsidy.”

It is further respectfully submitted that the road map for cross-subsidy reduction as per the tariff policy clause mentioned above has not been yet approved by the Hon’ble Commission.

Furthermore, it is respectfully submitted that in previous years the State Government had informed the subsidy to be provided to various class of consumers directly to the Hon’ble Commission. Thus, Discoms are in the view that the slab wise subsidy details for FY 2022-23 is being informed by the GoUP to the Hon’ble Commission directly. Moreover, the existing tariff approved by the Hon’ble Commission is not without Government Subsidy and slab-wise treatment of GoUP subsidy in T.O. dated 29.07.2021 is not mentioned., At present Discoms does not have any treatment of slab wise per unit subsidy which is essential requirements for the development of full cost tariff structure.

The Hon’ble Commission is requested to consider the above submission and may kindly consider the submission in reference to the Reply to Query 115 to 118 of data gap-1, submitted before the Commission on 11.04.2022.

Power Purchase

4. The Commission observed the following discrepancy in the power purchase cost and units for FY 2020-21 as shown in table below: -

Particular	Units	Tariff Petition	Tariff Formats along with Petition	Audited Accounts (Discoms)		Audited Accounts (UPPCL)	1 st Discrepancy Reply
Ex-Bus (Units)	MU	120580.34	120580.34	-		120589.94	120589.94
Fixed Charges	Rs. Cr.	19418.92	19418.92	DVVNL	11279.70	60720.32	19418.92
Energy Charges	Rs. Cr.	28617.47	28731.46	MVVNL	12878.18		28731.32
Other Charges	Rs. Cr.	7850.65	9277.80	PVVNL	19603.43		9210.24
Late Payment Surcharge	Rs. Cr.	4095.97	3353.87	PuVVNL	13334.04		3384.40
Total Power Purchase Cost	Rs. Cr.	59982.99	60782.05	KESCO	2535.83		
				Total	59631.18		60720.32
Subsidy, if any	Rs. Cr.	-	-	-		271.16	271.16
Net Power Purchase Cost	Rs. Cr.	59982.99	60782.05	59631.18		60449.16	60449.16
		Updated reconciliation is attached	Updated reconciliation is attached	Without Haryana+ Bihar		UPPCL BS	RECO

The Petitioner is required to reconcile and submit the revised calculation.

Reply:

The reasons for the differences in the first and second column has been provided under the reply to query no.10 of first data gap dated 11.04.2022. Further, the reconciliation statement for Rs. 60449.16 Crore is also provided along with the reply to the first data gap.

Further, the column no 3 above the reconciliation of power purchase cost of Discoms and their claim in MYT Format with the amount in Audited Balance Sheet is as under:

Amount in Rs. Cr.			
Discoms	MYT Format of Discom (Excel: Form F1, PDF: Page No. 8)	Tariff Petition (Table 2-7 for PVVNL and Table 2-6 for others)	Audited Balance Sheet (Note-19)
DVVNL	11,279.70	11,279.90*	11,279.70
MVVNL	12,878.18	12,878.18	12,878.18
PVNNL	19,603.83	19,603.83	Power Purchase from UPPCL – 19,603.43 UHBVN – 0.40 Total -19,603.83
PUVVNL	13,340.51	13,340.51	Power Purchase from UPPCL – 13,334.04 UHBVN – 6.47 Total -13,340.51
KESCO	2535.83	2535.83	2535.83

*typo error please consider 11,279.70

Reconciliation of Power Purchase cost captured under UPPCL balance sheet vis-à-vis Discoms balance sheet is as under:

RECONCILIATION OF POWER OF DISCOM AND UPPCL						Rs./Lacs
S.No.	DISCOM wise Sale in the books of UPPCL		Less Prior period Adjustment done by UPPCL	Total	Purchase as per Discom books	Difference as per last Years
	Note No.	20			19	
1		2	4	5=2-4	6	7=5-6
1	DVVNL	1130894.12	2,940.84	11,27,953.28	11,27,969.85	-16.58
2	MVVNL	1291157.09	3,357.60	12,87,799.49	12,87,817.97	-18.48
3	PVVNL	1965426.37	5,111.00	19,60,315.37	19,60,342.99	-27.63
4	PuVVNL	1336860.32	3,476.45	13,33,383.88	13,33,404.22	-20.35

RECONCILIATION OF POWER OF DISCOM AND UPPCL						Rs./Lacs
S.No.	DISCOM wise Sale in the books of UPPCL		Less Prior period Adjustment done by UPPCL	Total	Purchase as per Discom books	Difference as per last Years
	Note No.	20			19	
1		2	4	5=2-4	6	7=5-6
5	KeSCO	254251.43	661.17	2,53,590.27	2,53,582.57	7.69
6	Unbilled amount of Power Sale	66326.99		66,326.99	-	
	Total	6044916.33	15,547.05	60,29,369.27	59,63,117.62	-75.34

The plant wise details of prior period adjustments done by UPPCL is as under:

Name of Generating Company	Amount (Rs. Lakh)
M.B power	176.42
TRN	10.47
Lanco Anpara	15.54
UMPP Saasan (Excess Provision reversed)	13.49
PTC KWHEP	5.08
Lalitpur Power Project	15,267.79
H.P.S.E.B	58.27
TOTAL	15,547.05

5. Petitioner is required to provide actual inter-state transmission loss (% and MU) on inter-state energy units purchased for FY 2020-21 instead of 2.28% claimed on total energy wheeled.

Reply:

It is respectfully submitted that the total retail sales during FY 2020-21 as recorded was 90372.03 Mus and the actual cumulative distribution losses of UPPCL Discoms was 20.63%. for the estimation of energy balance the Petitioner has considered Intra state Transmission losses 3.37% as declared by the State Transmission License. Further, the total actual power purchased during the period was 120589.94 Mus. Petitioner has grossed up the actual sales of 90372.03 Mus with actual distribution and Intra state transmission losses and comes out to the total energy requirement at UPPTCL periphery as 117830.18 Mus. Further, to estimate the balancing Mus (120589.94 - 117830.18=2759.76) is considered on account of inter-state losses (i.e. 2.29%).

6. It is observed PGCIL charges comes out to Rs. 1.04 /kWh (PGCIL Charge/ Inter-State Transmitted Units *10 = 3737.28 Cr./36043.22 MU *10) for FY 2020-21. The Petitioner is required to the reason for such high inter-state transmission charge.

Reply:

The approved PGCIL charges vis-à-vis approved quantum is as under:

PGCIL (Approved)	2020-21	2021-22
Energy Purchase from Stations connected to Inter State Transmission network (PGCIL)	39,908.68	43,313.41
PGCIL Charges (Cr.)	3,153.60	3,311.28
Per unit chares approved by the Commission	0.79	0.76

It is further, submitted that the PGCIL charges is applicable on MW capacity instead of the per unit of energy wheeled. The Hon'ble Commission has also adopted the similar principle in its Tariff Orders.

7. The Petitioner has projected inter-state transmission loss as 3.47% on inter-state wheeled units for FY 2022-23. The Petitioner is required to provide the basis for such assumption.

Reply:

It is submitted that the petitioner has considered the 52 weeks' average for the inter-state transmission loss in its power purchase model for the projection of Power Purchase requirements of FY 2021-22 and FY 2022-23 as under:

Pooled transmission losses of Northern Regional Grid		
Week no.	Dates (dd/mm/yy format)	Pooled losses (%)
1	11/11/19 - 17/11/19	4.56
2	18/11/19 - 24/11/19	4.14
3	25/11/19 - 01/12/19	4.96
4	02/12/19 - 08/12/19	4.20
5	09/12/19 - 15/12/19	4.72
6	16/12/19 - 22/12/19	3.94
7	23/12/19 - 29/12/19	4.04
8	30/12/19 - 05/01/20	4.06
9	06/01/20 - 12/01/20	4.02
10	13/01/20 - 19/01/20	4.14
11	20/01/20 - 26/01/20	3.52
12	27/01/20 - 02/02/20	4.80

Pooled transmission losses of Northern Regional Grid		
Week no.	Dates (dd/mm/yy format)	Pooled losses (%)
13	03/02/20 - 09/02/20	3.20
14	10/02/20 - 16/02/20	3.56
15	17/02/20 - 23/02/20	3.58
16	24/02/20 - 01/03/20	4.00
17	02/03/20 - 08/03/20	4.38
18	09/03/20 - 15/03/20	3.46
19	16/03/20 - 22/03/20	3.66
20	23/03/20 - 29/03/20	3.88
21	30/03/20 - 05/04/20	3.46
22	06/04/20 - 12/04/20	3.10
23	13/04/20 - 19/04/20	3.36
24	20/04/20 - 26/04/20	3.62
25	27/04/20 - 03/05/20	3.60
26	04/05/20 - 10/05/20	3.20
27	11/05/20 - 17/05/20	2.80
28	18/05/20 - 24/05/20	2.94
29	25/05/20 - 31/05/20	3.04
30	01/06/20 - 07/06/20	2.96
31	08/06/20 - 14/06/20	2.92
32	15/06/20 - 21/06/20	3.10
33	22/06/20 - 28/06/20	3.02
34	29/06/20 - 05/07/20	3.08
35	06/07/20 - 12/07/20	3.18
36	13/07/20 - 19/07/20	2.82
37	19/07/20 - 20/07/20	2.88
38	27/07/20 - 02/08/20	2.96
39	03/08/20 - 09/08/20	2.84
40	10/08/20 - 16/08/20	2.76
41	17/08/20 - 23/08/20	3.08
42	24/08/20 - 30/08/20	2.94
43	31/08/20 - 06/09/20	2.88
44	07/09/20 - 13/09/20	2.66
45	14/09/20 - 20/09/20	3.24
46	21/09/20 - 27/09/20	3.16
47	28/09/20 - 04/10/20	3.32
48	05/10/20 - 11/10/20	2.98
49	12/10/20 - 18/10/20	3.36
50	19/10/20 - 25/10/20	3.32
51	26/10/20 - 01/11/20	3.42
52	02/11/20 - 08/11/20	3.64
52 weeks Average		3.47

8. Petitioner is required to provide the reason for claiming PGCIL as high as Rs. 0.85/kWh (PGCIL Charge/ Inter-State Transmitted Units *10 = 4134.35 Cr./48871.87 MU *10) for FY 2022-23.

Reply:

The Petitioner respectfully submitted that, it has considered 5% annual escalation on PGCIL charges year on year and the unit scheduled from Inter-state plants are based on MOD methodology. Further, the PGCIL charges is applicable on MW capacity wheeled instead of the per unit of energy wheeled.

9. The Petitioner is required to provide the update status (actual/ projected COD) of upcoming plants i.e. Ghatampur (Unit - 1 & 2), Jawaharpur, Obra-C, Harduaganj Extension etc. projected for power procurement for FY 2022-23.

Reply:

The Petitioner submits the desired data in below mentioned table:

List of Upcoming Plants			
Sl. No.	Plants	Units	Expected Date/ Month of COD
1	Ghatampur	Unit-1	Oct-22
		Unit-2	Feb-23
		Unit-3	Jun-23
2	Obra-C	Unit-1	Feb-23
		Unit-2	Aug-23
3	Jawaharpur	Unit-1	Feb-23
		Unit-2	Aug-23
4	Panki		Jun-23
5	Khurja STPP	Unit-1	Feb-24
		Unit-2	May-24
6	Vishnugarh Pipal Kothi		Oct-24
7	Subansiri Lower		Aug-23
8	Pakaldul		Jul-25

10. The Petitioner is required to provide the details of the generating power plant falling under Case-I projects.

Reply:

Details are as under:

Sl.No.	Generating Plants
1	M/s KSK Mahanadi
2	M/s RKM Power Generation Ltd
3	M/s TRN Energy (PTC India Ltd)
4	M/s MB Power (PTC India Ltd)

11. The Petitioner is required to provide the detailed Excel calculation along with formulas for energy projected from each source for FY 2022-23.

Reply:

The power Purchase model has been provided through email on 13.04.2022

12. The Petitioner is required to provide the basis for projection of MU, FC and EC for plants which are not in True up for FY 2020-21 like HARDUAGANJ EXT. Stage II, OBRA-C, Jawaharpur etc.

Reply:

The Variable Charges is considered based on interaction with UPRVUNL. Further, the Fixed charges for the same is considered on nominal basis as under:

The details of FC and VC as considered for the upcoming plants are as under:

S No.	Name of the Station	VC (Rs./kwh)*	FC (Rs./kwh)*
1	Harduaganj Extn-II	2.63	2.00
2	Obra C (unit 1)	1.94	2.50
	Obra C (unit 2)	1.94	2.50
3	Jawaharpur (unit 1)	2.68	2.50
	Jawaharpur (unit 2)	2.68	2.50
4	Panki Extn.	2.10	2.50

** provisional data only, final tariff yet to be finalized by UPERC*

Further, the MU has been estimated for scheduled power from the plants under MOD.

13. The Petitioner is required to provide the back-up calculation of DBST for FY 2022-23.

Reply:

The power purchase model has provided through email on 13.04.2022

Other Components of ARR

14. The Petitioner has submitted the break-up of CSS and Wheeling Charges recovered from Open Access consumers. However, these values are neither reflected in the Petition nor in the Audited Accounts of the Petitioner. The Petitioner to submit justification for the same and provide reconciliation with the Audited Accounts.

Reply:

The Petitioner here by Submits that CSS and Wheeling Charges recovered from Open Access Consumers are part of Revenue from Operations. The Petitioner has already submitted the breakup of 'Miscellaneous Charges from Consumers' in response to Query Number 64 of Data Gap-1. The same is mentioned in below table. It contains the Wheeling Charges & Cross Subsidy Charges recovered from Open Access Consumers as reflected in the audited balance sheet of the Petitioner.

Description	Amount (in Rs. Cr)
Line Rent	0.00
Reconnection/Disconnection Fee	12.92
Other recoveries from Consumers	142.36
Recoveries for Theft of Power	1.41
Recoveries for Mal Practices	0.83
Wheeling Charges	11.36
Total	168.89

Further, it is pertinent to highlight that Hon'ble Commission vide Data Gap – 1 asked the petitioner to submit the consumer wise Wheeling Charges and Cross Subsidy Charges. Due to urgency of matter and short time period provided, the Petitioner collected the required data from UPPTCL and submitted the same to Hon'ble Commission. However, it is clarified that the data provided to Hon'ble Commission was on provisional basis and not actual.

It is to be submitted that Rs. 11.36 Cr towards Wheeling Charges contains both wheeling charges and Cross Subsidy Charges. The reconciliation provided in Annexure-1 is of Rs. 10.10 Cr.

Further, it is requested to the Hon'ble Commission to consider Rs. 10.10 Cr towards Open Access Charges.

15. The Petitioner has submitted the Billing Determinants of Torrent Power, Agra. It is observed that the Connected Load and Sales are not matching with the submission made in the Petition. The Petitioner to provide the justification for the same.

Reply:

It is hereby submitted that this query does not pertains to MVVNL.

16. It is observed that no contribution from Grants is claimed for FY 2020-21 in Form F18 of the Formats submitted along with the Petition. Hence, Petitioner should provide scheme-wise break-up and fund flow of Grants for RGGVY 11th Plan, DDUGJY, ADB, RAPDRP, IPDS, SAUBHAGYA YOJNA, etc., till FY 2020-21.

Reply:

It is pertinent to highlight that the Petitioner has not received any grants under any of the scheme for FY 2020-21. However, the consumer contribution received in FY 2020-21 is already shown in Form-18. Further, its equivalent amortization is also reduced from Gross allowable depreciation to arrive at Net Allowable Depreciation.

17. The Petitioner was directed to submit the list of long-term loans (Form 31) along with the details of start date, amount, purpose, period of loan, interest payable, interest rate, any other special conditions, etc. However, the complete details are not available in Form F31 of the Petition. Hence, the Petitioner should resubmit the same as required by the Commission.

Reply:

It is pertinent to highlight that the Petitioner has already provided amount, interest payable, interest rate in Form F31 and the same has already clarified in Data gap-1. However, other details as desired by the Hon'ble Commission is mentioned below. The Petitioner further submits that remaining desired details are not readily available. Provisions are being made to capture such details and would be provided in future.

Scheme/Loan	Start Date	End Date	Period of Loan
PFC (R-APDRP)	24.09.15	15.07.31	13 years (including 03 years of Moratorium) yearly repayment
REC (R-APDRP)	29.10.13	15.10.27	15 years quarterly repayment
Govt of UP UDAY	-	-	-
REC(Transitional)	-	-	-
PFC(Transitional)	-	-	-
9.7% Bonds 04.07.16	04.07.16	-	-
9.7% Bonds 28.09.16	28.09.16	-	-
9.7% Bonds 30.03.17	30.03.17	-	-
8.97% Rated Bonds	-	-	-
8.48% Rated Bonds	-	-	-
9.75% Bonds 05.12.17	05.12.17	-	-
10.15% Bonds 27.03.18	27.03.18	-	-
PFC (IPDS)	-	-	-
REC (DDUGJY)	-	-	-
REC (Saubhagya)	-	-	-
PFC (NON Saubhagya)	-	-	-

18. It is observed that the bad debt as proposed for PuVVNL does not match with the audited accounts.

Reply:

It is hereby submitted that this query does not pertain to MVVNL.

Annexure-1

Name of Drawee Entity	Wheeling Charges (Rs. Cr.)	Cross Subsidy Surcharge (Rs. Cr.)	Total (Rs. Cr.)
Amrit Bottlers Pvt. Ltd. (RE-Generator)	0.07	-	0.07
Amrit Bottlers Pvt. Ltd., Faizabad	0.08	0.25	0.34
Hoin Mal Sons Enterprises(P) Ltd. Raebareli	0.12	0.47	0.59
Jai Jagdamba Mettalloys Ltd.	1.40	0.19	1.59
RCCPL Pvt. Ltd.	-	1.57	1.57
Reliance Industries Ltd., Barabanki	0.75	0.79	1.53
Rimjhim Stainless ltd., Unnao (RSL)	-	3.09	3.09
Ultratech Cements-Tanda Cement Works (earlier JAGO), Tanda	1.33	-	1.33
Total	3.75	6.35	10.11