

MADHYANCHAL VIDYUT VITRAN NIGAM LIMITED

TRUE-UP PETITION FOR FY 2022-23, APR
PETITION FOR FY 2023-24 AND ARR
PETITION FOR FY 2024-25 OF THE
CONTROL PERIOD FROM FY 2020-21 TO FY
2024-25



**MADHYANCHAL VIDYUT VITRAN NIGAM
LIMITED**

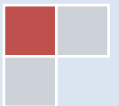


Table of Contents

1. Background and Procedural History	10
1.1. Background	10
1.2. Distribution Tariff Regulations	10
1.3. Petitions and Orders till now during the CP from FY 2020-21 to FY 2024-25	10
1.4. ARR Petition for FY 2024-25, APR for FY 2023-24 & True-up for FY 2022-23	11
2. True Up for FY 2022-23	12
2.1. Consumption Parameters: Consumer Numbers, Connected Load and Sales	12
2.2. Distribution Losses	13
2.3. Energy Balance	17
2.4. Power Purchase Expenses	19
2.5. Intra-State Transmission Charges	37
2.6. Operation and Maintenance Expenses	37
2.7. Capital Investment, Capitalisation and Financing	49
2.8. Interest & Finance Charges	50
2.9. Interest on Working Capital	52
2.10. Depreciation	55
2.11. Provision for Bad and Doubtful Debts	58
2.12. Return on Equity	59
2.13. Revenue from Sale of Power	60
2.14. Non-Tariff Incomes (NTI)	60
2.15. GoUP Subsidy	62
2.16. Aggregate Revenue Requirement (ARR) for FY 2022-23	62
3. Annual Performance Review (APR) for FY 2023-24	64
3.1. Consumption Parameters: Consumer Numbers, Connected Load and Sales	64
3.2. Distribution Loss	65
3.3. Energy Balance	65
3.4. Power Purchase Expense	66
3.5. Intra-State Transmission Charges	80
3.6. Operation and Maintenance Expenses	80
3.7. Capital Investment, Capitalisation and Financing	84
3.8. Interest & Finance Charges	87
3.9. Interest on Working Capital	89
3.10. Depreciation	91

3.11. Provision for Bad and Doubtful Debts	93
3.12. Return on Equity	93
3.13. Revenue from Sale of Power	94
3.14. Non-Tariff Income	94
3.15. GoUP Subsidy	95
3.16. Annual Performance Review (APR) for FY 2023-24	96
4. Aggregate Revenue Requirement (ARR) for FY 2024-25	98
4.1. Consumption parameters: Consumer numbers, Connected load, Sales	98
4.2. Distribution Loss	104
4.3. Energy Balance	104
4.4. Power Purchase Expense	105
4.5. Intra-State Transmission Charges	124
4.6. Operation and Maintenance Expenses	124
4.7. Capital Investment, Capitalisation and Financing	129
4.8. Interest & Finance Charges	133
4.9. Depreciation	135
4.10. Provision for Bad and Doubtful Debts	139
4.11. Return on Equity	139
4.12. Revenue from Sale of Power	140
4.13. Non-Tariff Incomes	145
4.14. GoUP Subsidy	145
4.15. Summary of ARR for FY 2024-25	146
5. Regulatory Assets	149
6. Category-wise Revenue and ABR for FY 2024-25	151
7. Compliance to Directives as per Tariff Order dated 24th May 2023.	154
8. Retail and Wheeling Business ARR Summary	164
9. Wheeling Charges from Open Access Consumers	166
10. Cross Subsidy Surcharge (CSS)	168
11. Appeal before the Hon'ble APTEL on previous Tariff Orders	170
12. Prayers	171

List of Tables

TABLE 2-1: ACTUAL CONSUMPTION PARAMETERS FOR FY 2022-23.....	12
TABLE 2-2 RDSS DISTRIBUTION LOSS TRAJECTORY AS PER ACTION PLAN.....	13
TABLE 2-3 ACTUAL DISCOM LOSSES IN PREVIOS YEARS	16
TABLE 2-4 ACTUAL DISCOM LOSSES IN LT & HT SYSTEM FOR CONTROL PERIOD FY 2022-2023.....	17
TABLE 2-5 : ENERGY BALANCE FOR FY 2022-23.....	18
TABLE 2-6 GENERATING STATION-WISE POWER PURCHASE COST FOR FY 2022-23.....	19
TABLE 2-7 POWER PURCHASE COST FOR FY 2022-23.....	37
TABLE 2-8 INTRA-STATE TRANSMISSION CHARGES FOR FY 2022-23	37
TABLE 2-10 TRUED UP AND BASE YEAR O&M EXPENSES FOR FY 2019-20 (IN RS. CR)	41
TABLE 2-11 INFLATION INDICES	42
TABLE 2-12 ADDITIONAL EMPLOYEE EXPENSES FOR FY 2022-23 (IN RS. CR).....	43
TABLE 2-15 COMPUTED R&M EXPENSES FOR FY 2022-23 (IN RS. CR).....	44
TABLE 2-16 NORMATIVE R&M EXPENSES FOR FY 2022-23 (IN RS. CR).....	44
TABLE 2-17 COMPUTED A&G EXPENSES FOR FY 2022-23 (IN RS. CR)	44
TABLE 2-18 ADDITIONAL A&G EXPENSES FOR FY 2022-23 (IN RS. CR).....	46
TABLE 2-18 NORMATIVE A&G EXPENSES FOR FY 2022-23 (IN RS. CR)	46
TABLE 2-19 OPERATION & MAINTENANCE EXPENSES CLAIMED FOR FY 2022-23 (IN RS. CR)	46
TABLE 2-20 SMART METERING OPEX FOR FY 2022-23.....	49
TABLE 2-21 CAPEX FOR FY 2022-23 (IN RS. CR).....	49
TABLE 2-22 CAPITAL INVESTMENT IN FY 2022-23 (IN RS. CR).....	49
TABLE 2-23 CONSUMER CONTRIBUTIONS, CAPITAL GRANTS AND SUBSIDIES IN FY 2022-23 (IN RS. CR).....	50
TABLE 2-24 FINANCING OF THE CAPITAL INVESTMENTS IN FY 2022-23 (IN RS. CR).....	50
TABLE 2-25 ALLOWABLE INTEREST ON LONG TERM LOAN FOR FY 2022-23 (IN RS. CR).....	51
TABLE 2-26 INTEREST ON SECURITY DEPOSIT FOR FY 2022-23 (IN RS. CR).....	52
TABLE 2-27 BANK AND FINANCE CHARGES FOR FY 2022-23 (IN RS. CR)	52
TABLE 2-28 INTEREST ON WORKING CAPITAL FOR FY 2022-23 (IN RS. CR)	53
TABLE 2-29 INTEREST AND FINANCE CHARGES FOR FY 2022-23 (IN RS. CR)	54
TABLE 2-30 GROSS ALLOWABLE DEPRECIATION FOR FY 2022-23 (IN RS. CR) PART A.....	56
TABLE 2-31 GROSS ALLOWABLE DEPRECIATION FOR FY 2022-23 (IN RS. CR) PART B.....	56
TABLE 2-32 NET ALLOWABLE DEPRECIATION FOR FY 2022-23 (IN RS. CR).....	58
TABLE 2-33 ALLOWABLE PROVISION FOR BAD AND DOUBTFUL DEBTS FOR FY 2022-23 (IN RS. CR).....	58
TABLE 2-34 RETURN ON EQUITY ROE FOR FY 2022-23 (IN RS. CR).....	59
TABLE 2-35 Revenue Realized under Renting of Pole/5G Activities FY 2022-23 (IN RS. CR)	60
TABLE 2-36 FINANCING COSTS OF DPS FOR FY 2022-23 (IN RS. CR)	61
TABLE 2-37 ADDITIONAL INTEREST INCURRED FOR FUNDING FY 2022-23 (IN RS. CR).....	61
TABLE 2-38 NON- TARIFF INCOME FOR FY 2022-23 (IN RS. CR)	62
TABLE 2-39 GOUP SUBSIDY FOR FY 2022-23 (IN RS. CR)	62
TABLE 2-40 AGGREGATE REVENUE REQUIREMENT (ARR) FOR FY 2022-23 (IN RS. CR)	62
TABLE 3-1: REVISED CONSUMPTION PARAMETERS FOR FY 2023-24	64
TABLE 3-2 DISTRIBUTION LOSS CONSIDERED FOR FY 2023-24	65
TABLE 3-3 ENERGY BALANCE FOR FY 2023-24	65

TABLE 3-4 CONSOLIDATED ENERGY BALANCE FOR FY 2023-24	66
TABLE 3-5 GENERATING STATION WISE POWER PURCHASE COST FOR FY 2023-24	67
TABLE 3-6 COMPUTATION OF DBST FOR FY 2023-24.....	78
TABLE 3-7 POWER PURCHASE COST FOR FY 2023-24.....	80
TABLE 3-8 INTRA-STATE TRANSMISSION CHARGES FOR FY 2023-24.....	80
TABLE 3-9 COMPUTED EMPLOYEE EXPENSES FOR FY 2023-24	81
TABLE 3-10 EMPLOYEE EXPENSES FOR FY 2023-24.....	81
TABLE 3-11 R&M EXPENSES FOR FY 2023-24.....	81
TABLE 3-12 NORMATIVE R&M EXPENSES FOR FY 2023-24.....	81
TABLE 3-13 COMPUTED A&G EXPENSES FOR FY 2023-24	82
TABLE 3-14 NORMATIVE A&G EXPENSES FOR FY 2023-24	82
TABLE 3-15 SMART METERING OPEX FOR FY 2023-24.....	83
TABLE 3-16 OPERATION & MAINTENANCE EXPENSES FOR FY 2023-24 (IN RS. CR).....	83
TABLE 3-17 RDSS PROJECT COST DETAILS OF MVVNL (IN RS. CR)	84
TABLE 3-18 CAPEX FOR FY 2023-24 (IN RS. CR).....	86
TABLE 3-19 CAPITAL INVESTMENT IN FY 2023-24 (IN RS. CR).....	86
TABLE 3-20 CONSUMER CONTRIBUTIONS, CAPITAL GRANTS AND SUBSIDIES IN FY 2023-24 (IN RS. CR).....	87
TABLE 3-21 FINANCING OF THE CAPITAL INVESTMENTS IN FY 2023-24 (IN RS. CR).....	87
TABLE 3-22 ALLOWABLE INTEREST ON LONG TERM LOAN FOR FY 2023-24 (IN RS. CR).....	88
TABLE 3-23 INTEREST ON SECURITY DEPOSIT FOR FY 2023-24 (IN RS. CR).....	89
TABLE 3-24 BANK AND FINANCE CHARGES FOR FY 2023-24 (IN RS. CR)	89
TABLE 3-25 INTEREST ON WORKING CAPITAL FOR FY 2023-24 (IN RS. CR)	90
TABLE 3-26 INTEREST AND FINANCE CHARGES FOR FY 2023-24 (IN RS. CR)	90
TABLE 3-27 GROSS ALLOWABLE DEPRECIATION FOR FY 2023-24 (IN RS. CR) PART A.....	91
TABLE 3-28 GROSS ALLOWABLE DEPRECIATION FOR FY 2023-24 (IN RS. CR) PART B	92
TABLE 3-29 NET ALLOWABLE DEPRECIATION FOR FY 2022-23 (IN RS. CR).....	93
TABLE 3-30 ALLOWABLE PROVISION FOR BAD AND DOUBTFUL DEBTS FOR FY 2023-24 (IN RS. CR).....	93
TABLE 3-31 RETURN ON EQUITY (ROE) FOR FY 2023-24 (IN RS. CR)	94
TABLE 3-32 NON- TARIFF INCOME FOR FY 2022-23 (IN RS. CR)	94
TABLE 3-33 DETAILS OF APPROVED GOUP SUBSIDY.....	95
TABLE 3-34 GOUP SUBSIDY FOR FY 2023-24 (IN RS. CR).....	95
TABLE 3-35 ANNUAL PERFORMANCE REVIEW (APR) FOR FY 2023-24 (IN RS. CR).....	96
TABLE 4-1: BILLING DETERMINANTS PROJECTED AS PER EXISTING TARIFF STRUCTURE FOR FY 2024-25.....	98
TABLE 4-3 DISTRIBUTION LOSS (%) FOR FY 2024-25	104
TABLE 4-4 ENERGY BALANCE FOR FY 2024-25	104
TABLE 4-5 CONSOLIDATED ENERGY REQUIREMENT FOR FY 2024-25.....	105
TABLE 4-6 COD OF UPCOMING PLANTS FOR FY 2024-25	108
TABLE 4-7 POWER PROCUREMENT PLAN FOR FY 2024-25 (MW).....	109
TABLE 4-8 DEMAND SUPPLY GAP FOR FY 2024-25	109
TABLE 4-9 ASSUMPTIONS CONSIDERED FOR FY 2024-25	110
TABLE 4-10 GENERATING STATION-WISE POWER PURCHASE COST & PER UNIT TOTAL COST FOR FY 2024-25	114
TABLE 4-11 COMPUTATION OF DBST FOR FY 2024-25.....	122
TABLE 4-12 POWER PURCHASE COST FOR FY 2024-25	124
TABLE 4-13 INTRA-STATE TRANSMISSION CHARGES FOR FY 2024-25.....	124
TABLE 4-14 INFLATION INDICES	124
TABLE 4-15 COMPUTATION OF EMPLOYEE EXPENSES FOR FY 2024-25 (IN RS. CR)	125

TABLE 4-16 EMPLOYEE EXPENSES FOR FY 2024-25 (IN RS. CR).....	125
TABLE 4-17 COMPUTATION OF R&M EXPENSES FOR FY 2024-25 (IN RS. CR)	125
TABLE 4-18 R&M EXPENSES FOR FY 2024-25 (IN RS. CR).....	126
TABLE 4-19 COMPUTED A&G EXPENSES FOR FY 2024-25 (IN RS. CR)	126
TABLE 4-20 NET A&G EXPENSES FOR FY 2024-25 (IN RS. CR).....	126
TABLE 4-21 SMART METERING OPEX FOR FY 2024-25.....	129
TABLE 4-22 OPERATION & MAINTENANCE EXPENSES PROJECTED FOR FY 2024-25 (IN RS. CR).....	129
TABLE 4-23 PROPOSED CAPITAL EXPENDITURE DETAILS FOR FY 2024-25 (IN RS. CR)	131
TABLE 4-24 CAPITALIZATION AND WIP OF INVESTMENT FOR FY 2024-25 (IN RS. CR)	132
TABLE 4-25 CONSUMER CONTRIBUTION, CAPITAL GRANTS & SUBSIDIES FOR FY 2024-25 (IN RS. CR).....	132
TABLE 4-26 FINANCING OF THE CAPITAL INVESTMENT FOR FY 2024-25 (IN RS. CR).....	132
TABLE 4-27 INTEREST ON LONG TERM LOAN FOR FY 2024-25 (IN RS. CR).....	133
TABLE 4-28 INTEREST ON SECURITY DEPOSIT FOR FY 2024-25 (IN RS. CR).....	134
TABLE 4-29 INTEREST ON WORKING CAPITAL FOR FY 2024-25 (IN RS. CR)	135
TABLE 4-30 INTEREST AND FINANCE CHARGES FOR FY 2024-25 (IN RS. CR)	135
TABLE 4-31 GROSS ALLOWABLE DEPRECIATION FOR FY 2024-25 (IN RS. CR) PART A.....	137
TABLE 4-32 GROSS ALLOWABLE DEPRECIATION FOR FY 2024-25 (IN RS. CR) PART B.....	138
TABLE 4-33 NET ALLOWABLE DEPRECIATION FOR FY 2024-25 (IN RS. CR).....	139
TABLE 4-34 ALLOWABLE PROVISION FOR BAD AND DOUBTFUL DEBTS FOR FY 2024-25 (IN RS. CR).....	139
TABLE 4-35 RETURN ON EQUITY (ROE) FOR FY 2024-25 (IN RS. CR)	140
TABLE 4-36 CATEGORY-WISE REVENUE AND ABR FOR FY 2024-25 (IN RS. CR) AT EXISTING TARIFF	140
TABLE 4-37 NON-TARIFF INCOME FOR FY 2024-25 (IN RS. CR).....	145
TABLE 4-38 ARR FOR FY 2024-25 (IN RS. CR)	146
TABLE 4-39 AVERAGE COST OF SUPPLY FOR FY 2024-25 (CONSOLIDATED FOR ALL DISCOMS).....	147
TABLE 5-1 REGULATORY ASSETS FROM FY 2000-01 TO FY 2021-22 (POST ISSUE OF GOUP LETTER).....	150
TABLE 6-1 CATEGORY-WISE REVENUE AND ABR FOR FY 2024-25 (IN RS. CR) AT EXISTING TARIFF (CONSOLIDATED FOR ALL DISCOMS)	151
TABLE-7-1: COMPLIANCE TO DIRECTIVES ISSUED UNDER TARIFF ORDER FOR FY 2023-24	154
TABLE 9-1: WHEELING AND RETAIL SUPPLY FOR THE FY 2024-25 (IN RS. CR).....	164
TABLE 10-1: WHEELING CHARGES FOR FY 2024-25.....	166
TABLE 10-2: VOLTAGE-WISE WHEELING CHARGES FOR FY 2024-25	166
TABLE 9-3: DISTRIBUTION CHARGES FOR FY 2024-25.....	167
TABLE 11-1: CROSS SUBSIDY SURCHARGE FOR FY 2024-25	169

List of Abbreviations

Abbreviation	Full Form
A&G	Administration & General
ACoS	Average Cost of Supply
Act	The Electricity Act, 2003
APR	Annual Performance Review
ARR	Aggregate Revenue Requirement
ATE	Appellate Tribunal of Electricity
BPL	Below Poverty Line
BST	Bulk Supply Tariff
CAGR	Compound Annualized Growth rate
Capex	Capital Expenditure
CEA	Central Electricity Authority
CERC	Central Electricity Regulatory Commission
CGRF	Consumer Grievance Redressal Forum
CGS	Central Generating Stations
COD	Commercial Operation Date
Commission	Uttar Pradesh Electricity Regulatory Commission
Cr	Crore
DBST	Differential Bulk Supply Tariff
Discom/DisCom	Distribution Company
DSM	Deviation Settlement Mechanism
EA 2003	The Electricity Act, 2003
EHT	Extra High Tension
ERP	Enterprise Resource Planning
FPPCA	Fuel and Power Purchase Cost Adjustment
FSA	Fuel Surcharge Adjustment
FY	Financial Year
GFA	Gross Fixed Assets
GoUP	Government of Uttar Pradesh
HP	Horsepower
HT	High Tension
IEX	Indian Energy Exchange Limited
IPDS	Integrated Power Development Scheme
IPP	Independent Power Producer

Abbreviation	Full Form
ISTS	Inter-State Transmission System
KVA	Kilo Volt Ampere
kWh	Kilo Watt Hour
LT	Low Tension
MOD	Merit Order Dispatch
MU	Million Units
MW	Mega Watt
MYT	Multi-Year Tariff
NFA	Net Fixed Assets
NTPC	National Thermal Power Corporation
O&M	Operation and Maintenance
PGCIL	Power Grid Corporation of India Ltd.
PLF	Plant Load Factor
PLR	Prime Lending Rate
POSOCO	Power System Operation Corporation Limited
PPA	Power Purchase Agreement
R&M	Repair and Maintenance
R-APDRP	Restructured Accelerated Power Development and Reforms Programme
REC	Renewable Energy Certificate
RLDC	Regional Load Dispatch Centre
RoE	Return on Equity
RPO	Renewable Purchase Obligation
SBI PLR	SBI Prime Lending Rate
SERC	State Electricity Regulatory Commission
SLDC	State Load Dispatch Centre
SLM	Straight Line Method
SOP	Standard of Performance
T&D	Transmission & Distribution
UI	Unscheduled Interchange
UPERC	Uttar Pradesh Electricity Regulatory Commission
WDV	Written Down Value

1. Background and Procedural History

1.1. Background

- 1.1.1. Madhyanchal Vidyut Vitaran Nigam Limited (hereinafter referred as 'Lucknow Discom' or 'MVVNL') came in to existence in 2003 as a subsidiary company of UPPCL and is responsible for power distribution in Discom covering its jurisdiction area of districts Badaun, Bareilly, Pilibhit, Shahjahanpur, Lakhimpur, Hardoi, Sitapur, Unnao, Bahraich, Shrawasti, Balrampur, Gonda, Barabanki, Rae Bareli, Faizabad, Sultanpur, Ambedkarnagar, Lucknow and Chhatrapati Sahuji Maharaj Nagar.

1.2. Distribution Tariff Regulations

- 1.2.1. The Hon'ble Commission notified the UPERC (Multi Year Tariff for Distribution and Transmission) Regulations, 2019 (hereinafter referred to as "MYT Regulations 2019") which will be applicable for determination of tariff from April 1, 2020 and onwards up to FY 2024-25 [i.e., till March 31, 2025] unless extended by the Order of the Hon'ble Commission. These Regulations were signed on 23rd September 2019, however, were finally published on Hon'ble Commission's website on 21st November 2019, after gazette notification.
- 1.2.2. This regulation is applicable for the purposes of Multi-Year Annual Revenue Requirement (ARR) filing and Tariff determination of all the distribution licensees within the State of Uttar Pradesh.

1.3. Petitions and Orders till now during the CP from FY 2020-21 to FY 2024-25

- 1.3.1. The Petitioner had submitted its Business Plan Petition for the Control Period from FY 2020- 21 to FY 2024-25 on February 28, 2020 and ARR and Tariff Petition for FY 2020-21 (including True-up for FY 2018-19 and APR for FY 2019-20) on June 30, 2020. In response to the same, the Hon'ble Commission has issued Business Plan Order on October 27, 2020 and Order for True-up for FY 2018-19, APR for FY 2019-20 and ARR & Tariff for FY 2020-21 on 11 November 2020.
- 1.3.2. The Petitioner submitted its ARR and Tariff Petition for FY 2021-22 (including True-up for FY 2019-20, APR for FY 2020-21) on Feb 22, 2021. In response to the same, the Hon'ble Commission issued its Order for True-up for FY 2019-20, APR for FY 2020-21 and ARR & Tariff for FY 2021-22 on July 29, 2021.
- 1.3.3. The Petitioner submitted its ARR and Tariff Petition for FY 2022-23 (including True-up for FY 2020-21, APR for FY 2021-22) on March 08, 2022.

- 1.3.4. Hon'ble Commission has issued Order for True-up for FY 2020-21, APR for FY 2021-22 and ARR & Tariff for FY 2022-23 on July 20, 2022.
- 1.3.5. The Petitioner submitted its ARR and Tariff Petition for FY 2023-24 (including True-up for FY 2021-22, APR for FY 2022-23) on January 09, 2023.
- 1.3.6. Hon'ble Commission has issued Order for True-up for FY 2021-22, APR for FY 2022-23 and ARR & Tariff for FY 2023-24 on May 24, 2023.

1.4. ARR Petition for FY 2024-25, APR for FY 2023-24 & True-up for FY 2022-23

- 1.4.1. The Petitioner is hereby submitting the audited True-up for FY 2022-23, APR Petition for FY 2023-24 and ARR Petition for FY 2024-25 under UPERC MYT Regulations, 2019 along with the prescribed tariff formats.

2. True Up for FY 2022-23

2.1. Consumption Parameters: Consumer Numbers, Connected Load and Sales

2.1.1. The actual overall consumption parameters for FY 2022-23 is in the range of the numbers approved by the Hon'ble Commission vide its Tariff Order dated 20.07.2022. Further, Sales is derivative of demand which is also uncontrollable in nature due to which Variation in Sales has been noticed in certain categories as mentioned in below table. The Category-wise approved consumption parameters vis-à-vis actual consumption parameters for FY 2022-23 is shown in the Table below:

TABLE 2-1: ACTUAL CONSUMPTION PARAMETERS FOR FY 2022-23

Category	Approved			Actual		
	Consumer s (Nos)	Load (kW)	Sales (MU)	Consumers (Nos)	Load (kW)	Sales (MU)
LMV-1 Domestic Light Fan & Power	8131895	10399543	12282.07	8174777	10166362.00	13144.84
LMV-2-Non Domestic Light Fan & Power	422774	1252409	1786	465858	1340281.00	1871.28
LMV-3 Public Lamps	1219	106239	330.84	2125	70793.00	291.62
LMV-4 Light, Fan & Power for Public/Private Institution	28263	153363	272.11	51696	183166.00	299.88
LMV-5 Private Tube Well/Pumping Sets	268407	1485497	2193.23	280600	1468090.00	2526.90
LMV-6 Small & Medium Power upto 100 hp/75kw	39433	426426	510.69	30683	337252.00	523.66
LMV-7 Public Water Works	15150	255674	1375.91	14805	241292	1333.86
LMV-9 Temporary Supply	6612	20845	22.65	11332	26223.00	37.50
LMV- 10 Departmental Employees	24941	78713	230.45	14671	48155.00	142.10
LMV -11 Electrical Vehicles	22	3821	3.94	116	8345.00	7.22
HV-1 Non Industrial Bulk Load	1410	496708	852.41	1603	508958.00	938.78
HV-2 Large & Heavy Power above 100 BHP (75 kW)	2380	857940	1731.01	2569	896537.00	1975.30
HV-3 Railway Traction	2	9671	31.7	2	12000.00	31.11
HV-4 Lift Irrigation & P. Canal above 100BHP (75kW)	35	30355	71.99	30	27218.00	78.27
Bulk Supply	-	-	-	0	0.00	0.00
Extra State Consumer	1	5000	8.78	1	5000.00	25.80
Total	8942544	15582202	21703.78	9050868	15339672.00	23228.10

2.1.2. Further, as directed by the Hon'ble Commission in its Tariff Order dated 20.07.2022, the Petitioner has taken care about booking of Sales under unmetered categories. The Sales booked under the unmetered categories are as per the norms approved by the Hon'ble Commission in its order dated 09.12.2016.

2.1.3. The Hon'ble Commission is requested to approve the actual consumption parameters as submitted in the above table.

2.2. Distribution Losses

2.2.1. UP State-owned Distribution Licensee are in process of formulation of Revamp Distribution Sector Scheme in the State. Accordingly, based on the actual distribution loss of the Discom, MVVNL has estimated the Loss trajectories for the Coming years for the implementation of the Scheme, same is as under:

TABLE 2-2 RDSS DISTRIBUTION LOSS TRAJECTORY AS PER ACTION PLAN

Distribution Loss	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
MVVNL	19.19%	17.21%	15.23%	14.20%

2.2.2. In this regard it is noteworthy that, Ministry of Power after considering the ground realities which have impacted UP Discom's efforts towards achieving the loss trajectory agreed under the MoU by its letter No.06/01(01)/2020 NEF(U) dated 06.03.2020 had sought for a revised action plan for reduction in distribution losses including AT&C loss trajectory from the Government of U.P. This evinces that the loss trajectory agreed under the UDAY MoU was not sacrosanct, since the same was based on then existing facts and circumstances, which have substantially changed presently.

2.2.3. It is further submitted that the distribution loss trajectory for the period FY 2020-21 to FY 2024-25 was approved by the Hon'ble Commission in its Business Plan Order dated 27.10.2020.

2.2.4. Moreover, the primary objective of UDAY scheme was to reduce AT&C losses which includes distribution loss as well as collection efficiency. While reduction in AT&C losses may be possible to the extent mentioned in UDAY scheme due to factors like improvement in collection efficiency, reduction in distribution losses are not feasible to that extent. It is also submitted that while the Hon'ble Commission has approved the Distribution losses in accordance with the trajectory as per the UDAY MoU, the Hon'ble Commission has not adopted the collection efficiency as per the UDAY agreement and has been issuing Tariff Orders on 100% collection efficiency, thereby partially adopting the UDAY agreement. In view of the above, the approved trajectory of distribution losses in Business Plan Order dated 27.10.2020 is neither achievable nor based on the adoption of UDAY agreement in totality. Even the MYT Regulations, 2014 provision related to sharing of difference of AT&C loss, was also not allowed by Hon'ble Commission in the True-Up Orders despite Licensee request. Therefore, considering only selected parameters of UDAY Scheme has caused huge financial loss to the Discom.

- 2.2.5. Considering the above mentioned facts Hon'ble Commission was also requested to delink the distribution losses for new control period from the normative losses approved for previous control period. This request of the Licensee is supported by the fact that MYT Regulations of the Hon'ble Commission are also changed at the start of new control period on the change of facts and circumstances experienced during the previous control period. Many provisions related to Financial Impact have been changed by the Hon'ble Commission in MYT Regulations, 2019 as compared to previous MYT Regulations. Accordingly, the changed facts and circumstances related to distribution loss trajectory should be considered.
- 2.2.6. In addition to the above it is pertinent to mention that provisions relating to sharing of distribution loss and AT&C loss does not exist in the UPERC MYT Regulations, 2019. Hence, the Petitioner would not be able to claim any sharing on account of distribution losses during the control period FY 2020-21 to FY 2024-25. Therefore, the Petitioner has to propose the distribution loss trajectory on the basis of actual loss level of FY 2022-23, and which the Petitioner can possibly achieve, otherwise it will result in-significant under recovery of power purchase cost.
- 2.2.7. It is a settled position that normative parameters under the MYT Order and Tariff Regulations ought to be fixed considering past performance (i.e., it should be relatable to past performance), actuals of the previous control period and it should be capable of achievement.
- 2.2.8. The Hon'ble Supreme Court in the matter of civil appeal no. 1933 of 2022 dated 23.11.2022 has directed all the SERCs as under: -

*“131. We direct all State Regulatory Commissions to frame Regulations under Section 181 of the Act on the terms and conditions for determination of tariff within three months from the date of this judgment. **While framing these guidelines on determination of tariff, the Appropriate Commission shall be guided by the principles prescribed in Section 61, which also includes the NEP and NTP.** Where the Appropriate Commission(s) has already framed regulations, they shall be amended to include provisions on the criteria for choosing the modalities to determine the tariff, in case they have not been already included. The Commissions while being guided by the principles contained in Section 61 shall effectuate a balance that would create a sustainable model of electricity regulation in the States. The Regulatory Commission shall curate to the specific needs of the State while framing these regulations. Further, the regulations framed must be in consonance with the objective of the Electricity Act 2003, which is to enhance the investment of private stakeholders in the electricity regulatory sector so as to create a sustainable and effective system of tariff determination that is cost efficient so that such benefits percolate to the end consumers.”*

It can be perceived from the above direction of Hon'ble APEX court that the Regulation shall be framed considering the provisions of National Tariff Policy. Further, clause 5.11(f) of National Tariff Policy 2016 lays down the framework for determination of operating norms for distribution tariff: -

“5.11 Tariff policy lays down the following framework for performance based cost of service regulation in respect of aspects common to generation, transmission as well as distribution. These shall not apply to competitively bid projects as referred to in para 6.1 and para 7.1 (6). Sector specific aspects are dealt with in subsequent sections.

f) Operating Norms

*Suitable performance norms of operations together with incentives and disincentives would need to be evolved along with appropriate arrangement for sharing the gains of efficient operations with the consumers. Except for the cases referred to in para 5.11(h)(2), the operating parameters in tariffs should be **at “normative levels” only and not at “lower of normative and actuals”**. This is essential to encourage better operating performance. The norms should be efficient, relatable to past performance, capable of achievement and progressively reflecting increased efficiencies and may also take into consideration the latest technological advancements, fuel, vintage of equipments, nature of operations, level of service to be provided to consumers etc. Continued and proven inefficiency must be controlled and penalized.”*

In terms of Clause 8.2 of the Tariff Policy 2016 The Hon'ble Commission is mandated to set an achievable distribution loss trajectory: -

“8.2 Framework for revenue requirements and costs 8.2.1 The following aspects would need to be considered in determining tariffs:

.....

(2) AT&C loss reduction should be incentivised by linking returns in a MYT framework to an achievable trajectory. Greater transparency and nurturing of consumer groups would be efficacious.”

.....

2.2.9. It is worthy to mention here that, the GoI letter No :24/3/3/2019-PFC(MoP)-Part(2)-(E-263367) dated 28.08.2023 in which it was advised to state commission to adhere to loss trajectory approved in the RDSS. In regard of above. The MoP letter is attached as Annexure-A.

- 2.2.10. It is submitted that the distribution loss trajectory being a normative parameter for determination of distribution tariff and hence for FY 2022-23 the same ought to have been relatable to past performance of the Discoms and capable of achievement. A table evincing the actual distribution losses of the Petitioner in the previous years (i.e. FY 2021-22 and FY 2022-23 the loss trajectory approved by the Hon'ble Commission, As per RDSS Scheme, As per MYT Order of the Hon'ble Commission and Actual achieved is as below: -

TABLE 2-3 ACTUAL DISCOM LOSSES IN PREVIOUS YEARS

Discom	FY 2021-22			FY 2022-23		
	As per RDSS Scheme	As per MYT Order	Actual	As per RDSS Scheme	As per MYT Order	Actual
MVVNL	19.19%	11.04%	17.36%	17.21%	10.63%	15.06%

- 2.2.11. It is evident that in the past years the actual distribution loss of the Petitioner was in the range of 19.19% to 15.06%. However, the Hon'ble Commission for FY 2022-23 has fixed a stringent and practically unachievable distribution loss trajectory for the Discoms, which is approximately 40% less than the actuals of the last fiscal year (i.e. FY 2021-22) and what was claimed by the Petitioner. There is no possible way that the Petitioner can achieve the loss trajectory approved by the Hon'ble Commission. It is pertinent to note that even the Hon'ble Commission in the True-up Order for FY 2020-21 has itself accepted that it approves a stringent distribution loss trajectory for the Petitioner, which is much lower than the actual losses of the Discoms: -

“6.7.40. In past, the Commission has approved several schemes for theft reduction and power quality improved like replacement of LT lines with ABC conductor, whose CAPEX was allowed in the ARR considering the merit of the schemes and benefits to both Discoms and also considering the fact that the Commission approves a stringent Distribution Loss trajectory in the ARR, which is much lower than the actual losses of the Discoms and such schemes like ABC cables should be allowed to encourage and support the Discoms/utilities efforts to reduce the losses and meet the Commission target.”

- 2.2.12. Hence, an impossible and impractical distribution loss trajectory would further impact the financial situation of the Licensees as it has a huge long-term impact on the Discoms and would result in severe under recovery of power purchase cost. Hence, it is requested to the Hon'ble Commission to approve the actual distribution loss as claimed by the Petitioner.
- 2.2.13. The actual voltage-wise distribution losses are submitted below for kind perusal of the Hon'ble Commission.

TABLE 2-4 ACTUAL DISCOM LOSSES IN LT & HT SYSTEM FOR CONTROL PERIOD FY 2022-2023

S.No.	Voltage Level	Actual (MUs)
A	System Losses At 220 kV	
1	Energy received into the system	14.87
2	Energy sold at this voltage level	14.87
3	Energy transmitted to the next (lower) voltage level	0.00
4	Energy Lost	0.00
5	Total Loss in the system (4/1)*100%	0.00%
B	System Losses At 132 kV	
1	Energy received into the system	170.84
2	Energy sold at this voltage level	170.75
3	Energy transmitted to the next (lower) voltage level	0.00
4	Energy Lost	0.09
5	Total Loss in the system (4/1)*100%	0.05%
C	System Losses At 33 kV	
1	Energy received into the system	27,161.50
2	Energy sold at this voltage level	613.03
3	Energy transmitted to the next (lower) voltage level	25,560.36
4	Energy Lost	988.11
5	Total Loss in the system (4/1)*100%	3.64%
D	System Losses at 11 kV	
1	Energy received into the system	25,560.36
2	Energy sold at this voltage level	19,857.75
	Energy transmitted to the next (lower) voltage level	2,723.28
3	Energy Lost	2,979.33
4	Total Loss in the system (4/1)*100%	11.66%
E	System Losses at LT	
1	Energy received into the system	2,723.28
2	Energy sold at this voltage level	2,571.70
3	Energy Lost	151.58
4	Total Loss in the system (4/1)*100%	5.57%
F	Overall Losses	
1	Energy In	27,347.21
2	Energy Out	23,228.10
3	Total T&D Loss ((1-2)/1)*100%	15.06%

2.3. Energy Balance

- 2.3.1. It is pertinent to mention that provisions relating to sharing of gains/losses on account of distribution losses and AT&C losses does not exist in the UPERC MYT Regulations, 2019 which were existing in the erstwhile UPERC MYT Distribution Tariff Regulations, 2014. Due to this the Petitioner would not be able to claim sharing of gains/losses on

account of variation in distribution losses during the control period from FY 2020-21 to FY 2024-25. Thus, the Petitioner is compelled to claim the actual distribution losses for FY 2022-23. The Hon'ble Commission is requested to consider the submission of the Petitioner and allow actual losses for FY 2022-23.

- 2.3.2. The Energy Balance approved by the Hon'ble Commission vis-à-vis actual/claimed Energy Balance for FY 2022-23 is shown in the Table below:

TABLE 2-5 : ENERGY BALANCE FOR FY 2022-23

Particulars	Approved in T.O. dt. 20.07.2022	Actual / Claimed
Retail Sales	21,703.77	23,228.10
Distribution Losses	10.63%	15.06%
Energy at Discom Periphery for Retail Sales	24,285.30	27,347.28
Intra-State Transmission Losses	3.27%	3.27%
Energy Available at State periphery for Transmission	25,106.27	28,271.77
Energy Purchase from Stations connected to Intra-State Transmission network (UPPTCL)	16,493.97	18,569.66
Energy Purchase from Stations connected to Inter-State Transmission network (PGCIL)	8,612.30	9,702.11
Inter-State Transmission Loss	3.47%	5.79%
Net Energy Received from Stations connected to Inter-State Transmission network at UPPTCL Periphery (Ex-Bus)	8,921.89	10,297.96
Power Purchase Required & Billed Energy (MU) (Ex-Bus)	25,415.86	28,867.62

2.4. Power Purchase Expenses

2.4.1. UPPCL is procuring power on behalf of Discoms at consolidated level. Accordingly, the Power Purchase section represents the consolidated power purchase at UPPCL level. The power purchased at UPPCL level is then allocated to DISCOMS on the basis of DBST methodology approved by Hon'ble Commission. Generating Station wise breakup of quantum and details of consolidated power purchase cost for UP discoms for FY 2022-23 is as follows:

TABLE 2-6 GENERATING STATION-WISE POWER PURCHASE COST FOR FY 2022-23

S.No	Source of Power (Station wise)	FY 2022-23									
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable charge		Annual Other Cost		Late payment (Rs. Cr.)	Total cost	
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)		(Rs. / kWh)	(Rs. Cr.)
A	Long term Sources										
a	Power procured from own Generating Stations (if any)										
b	From State Generating Stations Thermal										
1	ANPARA-A	3,641.97	0.74	270.55	2.08	758.73	-0.71	-257.58	-	2.12	771.70
2	ANPARA-B	5,620.84	0.46	257.42	1.85	1,041.54	0.64	357.94	-	2.95	1,656.90
3	ANPARA-D	7,706.65	1.41	1,088.75	1.81	1,392.97	-0.01	-10.59	-	3.21	2,471.13
4	HARDUAGANJ	617.28	1.28	78.98	1.91	118.04	0.00	0.15	-	3.19	197.16
5	HARDUAGANJ EXT.	1,829.19	2.91	532.38	4.52	827.23	1.74	318.33	-	9.17	1,677.94
6	HARDUAGANJ EXT. Stage II	3,131.93	2.12	663.52	2.73	855.77	-	-	-	4.85	1,519.29
7	OBRA-A	-	-	-	-	-	-	-31.17	-	-	-31.17
8	OBRA-B	5,056.40	0.73	367.89	2.46	1,244.62	0.17	86.37	-	3.36	1,698.87
9	PANKI	-	-	-	-	-	-	-122.81	-	-	-122.81
10	PARICHHA	-	-	-	-	-	-	20.73	-	-	20.73
11	PARICHHA EXT.	2,106.39	1.47	309.87	3.72	784.61	0.03	6.61	-	5.23	1,101.09
12	PARICHHA EXT. STAGE-II	2,557.97	1.84	470.16	3.71	948.78	0.08	20.83	-	5.63	1,439.77
13	UPRVUNL CONSOLIDATED	-	-	-	-	-	-	-	-	-	-

S.No	Source of Power (Station wise)	FY 2022-23									
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable charge		Annual Other Cost		Late payment	Total cost	
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)
	Sub-Total	32,268.64	1.25	4,039.52	2.47	7,972.28	0.12	388.81	-	3.84	12,400.61
c	From State Generating Stations Hydro										
1	RIHAND	279.53	0.83	23.33	0.46	12.93	-	-	-	1.30	36.26
2	OBRA (H)	155.98	0.68	10.55	0.41	6.44	-	-	-	1.09	16.99
3	MATATILA	78.68	0.39	3.04	0.47	3.71	-	-	-	0.86	6.75
4	KHARA	267.59	0.45	12.04	0.46	12.39	-	-	-	0.91	24.43
5	UGC	30.05	-	-	2.83	8.50	-	-	-	2.83	8.50
6	SHEETLA	2.25	-	-	1.54	0.35	-	-	-	1.54	0.35
7	BELKA	3.22	-	-	2.11	0.68	-	-	-	2.11	0.68
8	BABAIL	3.74	-	-	2.84	1.06	-	-	-	2.84	1.06
	UPJVNL CONSOLIDATED	-	-	-	-	-	-	-	-	-	-
	Sub-Total	821.02	0.60	48.96	0.56	46.06	-	-	-	1.16	95.03
d	From Central Sector Generating Stations										
a	Thermal (NTPC)										
1	ANTA GPS	-	-	51.09	-	-	-	0.45	-	-	51.54
2	AURAIYA GPS	-	-	104.15	-	-	-	0.74	-	-	104.88
3	DADRI GPS	285.48	3.42	97.67	12.95	369.63	0.49	13.96	-	16.86	481.27
4	FGUTPS-I	898.74	2.00	179.57	4.44	399.22	0.40	36.08	-	6.84	614.87
5	FGUTPS-II	564.93	1.76	99.28	4.18	235.87	0.68	38.35	-	6.61	373.50
6	FGUTPS-III	274.46	2.07	56.90	4.42	121.20	0.32	8.69	-	6.81	186.79
7	FGUTPS-IV	898.47	2.96	266.22	4.17	374.66	1.89	169.97	-	9.02	810.85
8	FSTPS	123.74	1.56	19.31	3.79	46.94	1.57	19.42	-	6.92	85.66
9	GODARWARA STPS-I	24.70	2.86	7.07	4.32	10.68	0.31	0.78	-	7.50	18.52
10	JHANOR GPS	0.00	50.37	0.01	19.22	0.00	0.48	0.00	-	70.07	0.01

S.No	Source of Power (Station wise)	FY 2022-23									
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable charge		Annual Other Cost		Late payment	Total cost	
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)
11	KAWAS GPS	0.00		0.01	-	-		0.04	-		0.05
12	KHARGONE STPS	26.02	2.60	6.77	5.26	13.69	0.33	0.86	-	8.20	21.33
13	KHTPS-I	279.24	1.96	54.74	3.68	102.70	0.68	18.96	-	6.32	176.41
14	KHTPS-II	1,113.46	1.69	188.40	3.50	389.45	0.44	49.02	-	5.63	626.88
15	KORBA-I STPS	16.49	0.70	1.15	1.53	2.52	0.33	0.54	-	2.55	4.21
16	KORBA-III STPS	6.56	1.41	0.93	1.46	0.96	0.16	0.10	-	3.03	1.99
17	LARA STPS-I	19.83	1.97	3.91	2.63	5.21	0.45	0.90	-	5.05	10.01
18	MAUDA-I STPS	23.20	2.12	4.92	4.59	10.66	-0.06	-0.15	-	6.65	15.43
19	MAUDA-II STPS	42.89	1.58	6.78	4.79	20.53	0.74	3.18	-	7.11	30.48
20	Nabinagar STP	733.44	3.12	228.63	2.71	198.90	0.05	3.96	-	5.88	431.49
21	NCTPS-I	376.82	1.48	55.70	4.97	187.42	0.80	30.08	-	7.25	273.19
22	NCTPS-II	388.87	2.79	108.58	4.86	189.12	0.67	25.94	-	8.32	323.63
23	RIHAND-I	2,057.01	0.95	194.85	1.61	330.40	0.12	25.41	-	2.68	550.67
24	RIHAND-II	2,354.46	0.70	165.66	1.54	362.81	0.29	67.20	-	2.53	595.66
25	RIHAND-III	2,431.44	1.39	336.89	1.52	370.18	0.31	75.61	-	3.22	782.69
26	SINGRAULI	5,374.08	0.66	353.20	1.48	795.98	0.29	153.19	-	2.42	1,302.37
27	SIPAT-I STPS	23.42	1.55	3.64	2.12	4.97	0.32	0.74	-	3.99	9.35
28	SIPAT-II STPS	10.23	1.07	1.10	2.35	2.41	-0.20	-0.21	-	3.22	3.30
29	SOLAPUR TPS	38.11	2.07	7.91	5.18	19.75	0.02	0.09	-	7.28	27.75
30	TANDA -II-TPS	4,950.29	1.99	985.80	3.91	1,935.92	0.22	109.47	-	6.12	3,031.20
31	TANDA -TPS	1,515.00	2.42	366.51	5.01	759.20	0.75	113.84	-	8.18	1,239.54
32	VINDHYANCHAL-I STPS	13.26	0.92	1.22	1.59	2.11	0.23	0.30	-	2.73	3.62
33	VINDHYANCHAL-II STPS	11.58	0.68	0.79	1.40	1.62	0.32	0.37	-	2.40	2.78
34	VINDHYANCHAL-III STPS	10.13	1.03	1.04	1.51	1.53	-0.75	-0.76	-	1.79	1.81
35	VINDHYANCHAL-IV STPS	16.05	1.37	2.20	1.50	2.41	0.42	0.67	-	3.29	5.29
36	VINDHYANCHAL-V STPS	7.51	1.59	1.20	1.55	1.16	0.22	0.17	-	3.37	2.53
37	NTPC CONSOLIDATED	-	-	-	-	-	-	-	3.91	-	3.91
	Sub-total	24,909.94	1.59	3,963.76	2.92	7,269.82	0.39	967.97	3.91	4.90	12,205.46

S.No	Source of Power (Station wise)	FY 2022-23									
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable charge		Annual Other Cost		Late payment	Total cost	
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)
e	NPCIL										
1	KAPS	4.41	-	-	2.25	0.99	0.03	0.01	-	2.28	1.01
2	NAPP	950.25	-	-	2.98	282.94	0.02	1.96	-	3.00	284.90
3	TAPP-3 & 4	15.14	-	-	3.40	5.15	0.05	0.08	-	3.45	5.23
4	RAPP-3 & 4	336.27	-	-	3.33	112.10	0.16	5.46	-	3.50	117.56
5	RAPP-5 & 6	736.19	-	-	3.90	287.40	0.02	1.23	-	3.92	288.63
6	NPCIL CONSOLIDATED	-	-	-	-	-	-	-	74.84	-	74.84
	Sub-Total	2,042.27	-	-	3.37	688.58	0.04	8.75	74.84	3.78	772.17
f	Hydro (NHPC)										
1	SALAL	213.14	0.88	18.86	0.63	13.34	1.24	26.41	-	2.75	58.60
2	TANAKPUR	93.70	2.34	21.89	1.63	15.27	0.07	0.70	-	4.04	37.85
3	CHAMERA-I	373.51	1.05	39.08	1.14	42.49	0.12	4.52	-	2.31	86.10
4	URI	536.35	0.97	52.00	0.82	44.09	0.55	29.38	-	2.34	125.46
5	CHAMERA-II	314.68	1.19	37.48	1.00	31.62	0.08	2.44	-	2.27	71.54
6	DHAULIGANGA	289.85	1.34	38.89	1.23	35.70	0.15	4.31	-	2.72	78.89
7	DULHASTI	495.05	2.19	108.50	2.27	112.60	-1.05	-52.22	-	3.41	168.88
8	SEWA-II	126.17	3.06	38.63	2.65	33.41	7.02	88.55	-	12.73	160.59
9	CHAMERA-III	228.12	2.35	53.56	1.97	44.94	0.33	7.54	-	4.65	106.04
10	URI-II	350.97	2.02	70.80	1.91	67.07	0.78	27.28	-	4.71	165.16
11	PARBATI-III HEP	145.80	4.56	66.56	1.54	22.44	0.00	0.06	-	6.11	89.06
12	KISHANGANGA	637.61	2.21	140.60	1.97	125.54	0.16	9.91	-	4.33	276.06
13	NHPC CONSOLIDATED	-	-	-	-	-	-	-	1.68	-	1.68
	Sub-Total	3,804.94	1.81	686.82	1.55	588.51	0.39	148.88	1.68	3.75	1,425.90
g	HYDRO (NTPC)										
1	KOLDAM HPS	619.79	2.86	177.40	2.44	151.30	0.06	3.59	-	5.36	332.28

S.No	Source of Power (Station wise)	FY 2022-23									
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable charge		Annual Other Cost		Late payment	Total cost	
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)
2	SINGRAULI SHPS	13.71	-	-	5.04	6.91	0.00	0.00	-	5.04	6.91
	Sub-Total	633.50	2.80	177.40	2.50	158.21	0.06	3.59	-	5.35	339.20
h	THDC										
0	HYDRO										
1	TEHRI	1,259.77	1.85	233.54	1.95	246.11	-0.01	-0.70	-	3.80	478.95
2	KOTESHWAR	490.43	2.39	117.37	2.41	118.28	4.39	215.11	-	9.19	450.75
3	DHUKWAN	81.11	-	-	4.88	39.55	0.04	0.30	-	4.91	39.84
4	THDC Consolidated	-	-	-	-	-	-	4.00	-	-	4.00
	Sub-Total	1,831.32	1.92	350.90	2.21	403.93	1.19	218.71	-	5.32	973.54
i	SJVN										
1	RAMPUR	296.41	2.47	73.35	2.07	61.24	0.28	8.18	-	4.82	142.77
2	NATHPA JHAKRI	1,160.40	1.28	148.58	1.18	137.17	0.12	14.38	-	2.59	300.13
3	SJVNL Consolidated	-	-	-	-	-	-	0.46	5.11	-	5.57
	Sub-Total	1,456.81	1.52	221.93	1.36	198.41	0.16	23.02	5.11	3.08	448.47
j	NEEPCO										
1	Kameng HEP	263.77	-	-	4.00	105.51	0.06	1.68	-	4.06	107.19
	Sub-Total	263.77	-	-	4.00	105.51	0.06	1.68	-	4.06	107.19
k	IPP/JV										
	HYDRO										
1	TALA	104.75	-	-	2.27	23.78	-	-	-	2.27	23.78
2	SRI NAGAR HEP	1,330.57	3.69	490.81	3.21	426.79	1.56	206.94	-	8.45	1,124.54
3	Vishnu Prayag	1,697.58	0.14	24.48	1.03	175.45	0.25	42.39	-	1.43	242.32

S.No	Source of Power (Station wise)	FY 2022-23									
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable charge		Annual Other Cost		Late payment	Total cost	
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)
4	KARCHAM	816.29	1.58	129.10	1.41	115.08	-1.25	-102.06	0.73	1.75	142.84
5	TEESTA-III	872.86	3.26	284.53	2.71	236.86	-1.16	-100.86	2.90	4.85	423.43
6	TEESTA URJA LTD	-	-	-	-	-	-	-	-	-	-
7	GMR BAJOLI HOLI	157.66	2.32	36.51	2.92	45.96	0.12	1.92	-	5.35	84.39
8	Tidong Power Generation	75.96	2.11	15.99	2.31	17.54	0.45	3.40	-	4.86	36.93
	Sub-Total	5,055.66	1.94	981.41	2.06	1,041.46	0.10	51.72	3.63	4.11	2,078.22
	Thermal										
1	APCPL	77.61	2.35	18.25	4.84	37.54	0.76	5.89	25.53	11.24	87.20
2	BEPL BARKHERA	267.83	5.60	149.89	4.59	122.90	3.41	91.29	-	13.59	364.08
3	BEPL KHAMBHAKHERA	241.51	6.27	151.55	4.78	115.53	1.57	37.81	9.12	13.00	314.01
4	BEPL KUNDRAKHI	294.01	5.13	150.80	4.59	134.93	0.94	27.68	137.12	15.32	450.53
5	BEPL MAQSOODAPUR	269.39	5.55	149.41	4.48	120.81	1.46	39.39	-17.88	10.83	291.72
6	BEPL UTRAULA	260.05	5.97	155.17	4.72	122.76	1.52	39.57	-	12.21	317.50
7	Ksk Mahanadi	5,536.44	2.57	1,421.88	3.27	1,808.91	0.68	376.21	113.97	6.72	3,720.97
8	Lalitpur	10,825.27	2.88	3,117.18	3.48	3,771.29	0.00	4.85	112.31	6.47	7,005.62
9	Lanco	6,698.77	0.85	567.77	2.49	1,668.56	0.12	81.97	2.22	3.46	2,320.53
10	M.B.POWER (PTC)	3,508.46	1.76	617.32	1.34	469.30	0.59	206.07	4.69	3.70	1,297.38
11	Meja Thermal Power Plant	5,564.35	2.40	1,332.98	3.12	1,734.63	-0.02	-10.14	2.46	5.50	3,059.92
12	Nabinagar Power Project	385.54	2.56	98.74	2.68	103.22	-0.04	-1.42	5.20	5.34	205.74
13	PRAYAGRAJ POWER	10,868.67	1.13	1,230.16	2.33	2,529.89	-0.00	-5.01	58.37	3.51	3,813.41
14	R.K.M.POWER	2,870.03	1.95	558.42	1.88	539.01	0.10	27.36	-4.63	3.90	1,120.16
15	ROSA-1&2	6,428.56	1.97	1,264.81	3.32	2,132.44	-0.18	-113.20	-	5.11	3,284.06
16	SASAN	3,388.07	0.16	54.63	1.15	389.35	0.11	36.98	-	1.42	480.97
17	TRN ENERGY (PTC)	2,144.77	1.70	363.73	1.69	362.12	0.14	30.51	-0.21	3.53	756.16
	Sub-Total	59,629.32	1.91	11,402.68	2.71	16,163.18	0.15	875.81	448.27	4.84	28,889.95
	Total	-	-	-	-	-	-	-	-	-	-

S.No	Source of Power (Station wise)	FY 2022-23									
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable charge		Annual Other Cost		Late payment	Total cost	
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)
B	Medium term Sources										
	Station/Source 1	-	-	-	-	-	-	-	-	-	-
	Station/Source 2	-	-	-	-	-	-	-	-	-	-
	Sub-Total	-	-	-	-	-	-	-	-	-	-
C	Short term Sources										
	Station/Source 1	-	-	-	-	-	-	-	-	-	-
	Station/Source 2	-	-	-	-	-	-	-	-	-	-
	Sub-Total	-	-	-	-	-	-	-	-	-	-
D	Cogen/ Captive										
1	Abhinav Steel (CPP)	-	-	-	-	-	-	-	-	-	-
2	Aditya birla camicals (Grasim Industries)	-	-	-	-	-	-	-	-	-	-
3	Akbarpur Chini Mills Ltd.,	24.32	0.98	2.38	1.61	3.91	0.00	0.01	-	2.59	6.30
4	Avadh sugar Energy Limited, Hargaon	42.17	1.45	6.11	1.95	8.21	-	-	-	3.40	14.32
5	Avadh sugar energy ltd. Sehora Bijnor (upper ganges)	69.84	1.28	8.91	1.89	13.20	-	-	-	3.17	22.12
6	Bajaj Hindustan Ltd., Barkhera	7.77	1.26	0.98	2.04	1.58	0.00	0.00	-	3.30	2.56
7	Bajaj Hindustan Ltd., Bilai	31.74	1.26	4.00	2.04	6.48	0.00	0.00	-	3.30	10.48
8	Bajaj Hindustan Ltd., Budhana	28.64	1.26	3.61	2.04	5.84	0.00	0.00	-	3.30	9.45
9	Bajaj Hindustan Ltd., Gangnauli	0.07	1.26	0.01	2.04	0.01	0.19	0.00	-	3.49	0.02
10	Bajaj Hindustan Ltd., Khambakhera, Lakhimpur	3.34	1.26	0.42	2.04	0.68	0.00	0.00	-	3.30	1.10
11	Bajaj Hindustan Ltd., Kinauni	29.71	1.26	3.74	2.04	6.06	0.00	0.00	-	3.30	9.81

S.No	Source of Power (Station wise)	FY 2022-23									
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable charge		Annual Other Cost		Late payment	Total cost	
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)
12	Bajaj Hindustan Ltd., Kundrakh	12.14	1.25	1.52	1.99	2.42	0.00	0.00	-	3.24	3.93
13	Bajaj Hindustan Ltd., Maqsoodapur	5.69	1.29	0.73	2.04	1.16	0.00	0.00	-	3.33	1.90
14	Bajaj Hindustan Ltd., Paliaklan	6.42	1.26	0.81	2.04	1.31	0.00	0.00	-	3.30	2.12
15	Bajaj Hindustan Ltd., Thanabhawn	31.44	1.26	3.96	2.04	6.41	0.00	0.00	-	3.30	10.37
16	Bajaj Hindustan Ltd., Utraula	5.46	1.39	0.76	1.93	1.05	0.00	0.00	-	3.32	1.81
17	Balrampur Chini Mills Ltd., (Maizapur)	9.07	1.74	1.58	2.35	2.13	0.01	0.01	-	4.09	3.71
18	Balrampur Chini Mills Ltd., (Tulsipur)	4.07	1.66	0.68	2.42	0.99	0.01	0.01	-	4.09	1.67
19	Balrampur Chini Mills Ltd., Balrampur	26.08	1.42	3.70	2.09	5.45	0.18	0.46	-	3.68	9.60
20	Balrampur Chini Mills Ltd., Gonda (Babhnan)	20.40	1.51	3.08	1.90	3.87	0.00	0.01	-	3.41	6.95
21	Continental Carbon India Ltd.	36.99	1.78	6.59	2.45	9.06	-	-	-	4.23	15.65
22	Dalmia Chini Mills Ltd., Jawaharpur	66.78	1.26	8.44	1.96	13.08	-	-	-	3.22	21.52
23	Dalmia Chini Mills Ltd., Nigohi	53.27	1.26	6.71	2.04	10.87	-	-	-	3.30	17.58
24	Dalmia Chini Mills Ltd., Ramgarh	31.08	1.26	3.92	2.04	6.34	-	-	-	3.30	10.26
25	Daurala Sugar Works(DCM)	48.27	1.29	6.20	2.04	9.85	-	-	-	3.33	16.05
26	Daya Sugar Saharaanpur	6.42	1.81	1.16	2.35	1.51	-0.47	-0.30	-	3.69	2.37
27	DCM Sriram Consdolidated Ltd, Loni,Hardoi	39.71	1.28	5.08	2.04	8.10	-	-	-	3.32	13.18
28	DCM Sriram Consolidated	112.67	1.49	16.82	2.46	27.76	-	-	-	3.96	44.58

S.No	Source of Power (Station wise)	FY 2022-23									
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable charge		Annual Other Cost		Late payment	Total cost	
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)
	Ltd, Hariawan,Hardoi										
29	DCM Sriram Consolidated Ltd., Lakhimpur Ajbapur	194.97	0.56	10.90	1.59	31.06	-	-	-	2.15	41.96
30	Dhampur Sugar Mills Ltd., Bareilly,Meerganj	19.66	1.24	2.44	2.05	4.03	-	-	-	3.29	6.47
31	Dhampur Sugar Mills Ltd., DHAMPUR, Bijnor	118.12	1.30	15.35	2.61	30.77	-	-	-	3.90	46.12
32	Dhampur Sugar Mills Ltd., Muzaffarnagar,Mansoorpur	60.11	1.26	7.57	2.04	12.26	-	-	-	3.30	19.84
33	Dhampur Sugar Mills Ltd., Rajpura,Sambhal	51.08	2.08	10.64	1.93	9.86	-	-	-	4.01	20.50
34	Dhampur Sugar Mills Ltd., Sambhal,Asmoli,Dhampur	56.51	1.45	8.21	2.35	13.25	-	-	-	3.80	21.46
35	Dwarikesh Sugar Ind. Ltd., Dhampur Bijnor	57.46	1.28	7.35	2.05	11.76	-	-	-	3.33	19.11
36	Dwarikesh Sugar Ind. Ltd., Faridpur Bareilly	63.13	1.28	8.08	2.07	13.08	-	-	-	3.35	21.16
37	Dwarikesh Sugar Ind. Ltd., Nagina Bijnor	25.04	1.24	3.10	2.08	5.20	-	-	-	3.32	8.31
38	Govind Sugar	79.50	1.91	15.17	1.84	14.61	-	-	-	3.75	29.78
39	Gularia Chini Mills Ltd.,	55.93	1.28	7.17	2.00	11.16	0.00	0.01	-	3.28	18.33
40	Haidergarh Chini Mills Ltd.,	43.47	1.22	5.29	2.04	8.87	0.00	0.01	-	3.26	14.16
41	Hindalco Industries Ltd. Renukoot	-	-	-	-	-	-	-	-	-	-
42	India Glycols	3.59	2.07	0.74	5.24	1.88	-	-	-	7.31	2.63
43	K.M. Sugar Ltd.,	26.88	1.25	3.36	2.04	5.48	-	-	-	3.29	8.84
44	Kesar Enterprises Ltd.	99.75	1.40	13.97	1.93	19.25	-	-	-	3.33	33.22
45	Kisan Sahkari Chini Mill Azamgarh	13.78	2.23	3.07	1.41	1.94	-	-	-	3.64	5.02
46	Kumbhi Sugar Mills Ltd.,	32.50	1.61	5.25	1.98	6.44	0.00	0.01	-	3.60	11.69
47	L.H. Suagar Factories Ltd.,	67.39	1.13	7.60	2.04	13.75	-	-	-	3.17	21.35

S.No	Source of Power (Station wise)	FY 2022-23									
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable charge		Annual Other Cost		Late payment	Total cost	
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)
48	Mankapur Chini Mills Ltd.,	66.09	1.41	9.31	2.07	13.70	0.08	0.52	-	3.56	23.52
49	Mawana Sugar Ltd., Meerut	28.14	1.45	4.08	2.37	6.66	-	-	-	3.82	10.75
50	Mawana Sugar Ltd., Naglamal	50.96	1.52	7.72	1.77	9.00	-	-	-	3.28	16.72
51	Mawana Sugar Ltd., Titawi	52.32	1.10	5.73	1.77	9.28	-	-	-	2.87	15.01
52	New India Sugar Mills., Now, Avadh Sugar Kushinagar	48.01	1.28	6.15	2.04	9.79	0.18	0.86	-	3.50	16.80
53	Novel Sugar (bajaj sugar barkhera)	1.86	-	-	3.24	0.60	-	-	-	3.24	0.60
54	Oswal Overseas	10.29	1.69	1.74	2.58	2.65	-0.05	-0.06	-	4.22	4.34
55	Parle Biscuits Pvt. Ltd. (Sugar Dn.),	8.69	1.17	1.02	2.04	1.77	-	-	-	3.21	2.79
56	Ramala Sahkari Chini Mills (Baghpat) UP	56.00	1.80	10.08	2.89	16.18	-	-	-	4.69	26.27
57	Rana Sugar Miis Ltd. Karimganj Rampur	29.33	1.48	4.34	2.00	5.88	-	-	-	3.48	10.22
58	Rana Sugar Miis Ltd. Belwara, Moradbad	25.79	1.51	3.89	2.00	5.15	-	-	-	3.51	9.05
59	Rana Sugar Miis Ltd. Bilari, Moradabd	50.46	2.23	11.25	1.93	9.74	-	-	-	4.16	20.99
60	Rauzagaon Chini Mills Ltd.,	35.39	1.28	4.53	2.04	7.22	0.00	0.00	-	3.32	11.75
61	SBEC Bioenergy Ltd.	34.06	1.24	4.22	2.04	6.95	-	-	-	3.28	11.17
62	Simbholi Sugar Ltd., Bahraich Chilwaria	15.36	1.57	2.42	1.99	3.06	-	-	-	3.56	5.47
63	Simbholi Sugar Ltd., Hapur	89.45	1.77	15.81	1.97	17.61	-	-	-	3.74	33.42
64	SKI Hi Tech Carbon (Now Birla Carbon India Pvt. Ltd.)	35.47	2.26	8.02	2.89	10.25	-	-	-	5.15	18.27

S.No	Source of Power (Station wise)	FY 2022-23									
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable charge		Annual Other Cost		Late payment	Total cost	
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)
65	Sukhbir Agro Energy Ltd.	56.20	1.66	9.33	5.57	31.30	-	-	-	7.23	40.63
66	Superior Food Grain ,Shamli	69.54	2.23	15.51	1.93	13.42	-	-	-	4.16	28.93
67	The Seksaria, Biswan	90.87	2.44	22.21	1.92	17.46	-	-	-	4.36	39.66
68	Tikaula Sugar Ltd.,	40.66	1.37	5.59	2.36	9.59	-	-	-	3.73	15.18
69	Triveni Engg. & Industries Ltd., Milak Narayanpur	4.80	1.26	0.60	2.04	0.98	-	-	-	3.30	1.58
70	Triveni Engg. & Industries Ltd., Chandpur, Hassanpur	8.14	1.26	1.03	2.04	1.66	-	-	-	3.30	2.69
71	Triveni Engg. & Industries Ltd., Deoband Saharanpur	52.24	1.24	6.48	2.04	10.66	-	-	-	3.28	17.13
72	Triveni Engg. & Industries Ltd., Khatuali ,Muzaffarnagar	118.78	1.15	13.66	2.04	24.23	-	-	-	3.19	37.89
73	Triveni Engg. & Industries Ltd., Sabitgarh	11.36	1.97	2.24	1.95	2.22	-	-	-	3.92	4.45
74	U.P State Sugar & Cane Development Cor. (Munderva Basti)	29.78	0.55	1.63	4.14	12.34	-	-	-	4.69	13.97
75	U.P State Sugar & Cane Development Cor. Ltd. PIPRAICH, GORAKHPUR	29.10	1.50	4.36	3.24	9.42	-	-	-	4.74	13.79
76	U.P STATE SUGAR CORPORATION LTD. MOHIUDDIN PUR, MEERUT	11.38	2.02	2.30	2.49	2.83	-	-	-	4.51	5.13
77	Usher Eco Power	-	-	-	-	-	-	-	-	-	-
78	Uttam Sugar Mills, Ltd. Barkatpur, Bijnor	51.75	1.23	6.35	1.96	10.14	-	0.41	-	-	16.90
79	Uttam Sugar Mills, Ltd. Khaikheri Muzaffarnagar	31.50	1.22	3.85	2.04	6.42	-	-	-	3.26	10.27

S.No	Source of Power (Station wise)	FY 2022-23									
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable charge		Annual Other Cost		Late payment	Total cost	
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)
80	Uttam Sugar Mills, Ltd. Shermau Saharanpur	30.44	1.27	3.86	2.48	7.56	-	-	-	3.75	11.42
81	Wave Ind. & Engg. Ltd.,	0.39	1.28	0.05	2.04	0.08	-	-	-	3.32	0.13
82	Yadu Sugars Ltd.,	12.06	1.24	1.49	1.93	2.33	-	-	-	3.17	3.82
83	Banked energy	-1,251.41	-	-	-0.11	13.39	-	-	-	-0.11	13.39
	Sub-Total	1,857.68	2.36	438.03	3.68	683.52	0.01	1.93	-	6.05	1,123.49
E	Bilateral & Others (Power purchased through Trading)										
1	Power Purchase From Exchange	-	-	-	-	-	-	-	-	-	-
	IEX (Sale)/PXIL (Sale)	8,224.02	-	-	5.05	4,149.99	-	-	-	5.05	4,149.99
	IEX (Purchase)/PXIL (Purchase)	1,720.81	-	-	9.11	1,568.13	0.00	0.14	-	9.11	1,568.26
	NET-IEX	-6,503.20	-	-	-	-2,581.86	-	0.14	-	-	-2,581.72
	Hindustan power exchange (HPX)	-	-	-	-	-	-	0.00	-	-	0.00
2	Purchase From Open Access (OA)	1,011.77	-	-	5.27	532.76	-	-	10.49	5.37	543.25
i)	NHPC	-	-	-	-	-	-	-	-	-	-
ii)	TATA / MPL / ADANI ENTERPRISES	210.91	-	-	5.17	109.00	-	-	10.49	5.67	119.49
iii)	Tangedico	-	-	-	-	-1.28	-	-	-	-	-1.28
iv)	NVVN	42.64	-	-	4.65	19.84	-	-	-	4.65	19.84
v)	PTC	758.21	-	-	5.34	405.21	-	-	-	5.34	405.21
O	Sub-Total	-5,491.44	-	-	3.73	-2,049.10	-0.00	0.14	10.49	3.71	-2,038.47
E 1	Unscheduled Interchange										
i	UI (Underdrawl)	-2,284.23	-	-	-0.11	24.74	-	-	0.16	-0.11	24.90

S.No	Source of Power (Station wise)	FY 2022-23									
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable charge		Annual Other Cost		Late payment	Total cost	
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)
ii	UI (Overdrawl)	1,173.65	-	-	0.36	41.93	-	-	-	0.36	41.93
	Sub-Total	-1,110.58	-	-	-0.60	66.67	-	-	0.16	-0.60	66.84
F	Solar (Existing)										
1	Adani Green Energy	93.17	-	-	12.66	117.98	-	-	18.75	14.68	136.73
2	Adani Solar Energy Chitrakoot. (50 MW)	110.03	-	-	3.07	33.78	1.80	19.77	-	4.87	53.55
3	Adani Solar Energy Four Pvt. Ltd., Bhahpur, Hardoi	105.11	-	-	3.19	33.53	-	-	-	3.19	33.53
4	Adani Solar Energy Four Pvt. Ltd., Sukrullapur, Budaun	105.82	-	-	3.22	34.08	-	-	-	3.22	34.08
5	Agrawal Solar Power Pvt. Ltd.	8.73	-	-	7.02	6.13	-	-	-	7.02	6.13
6	Aryavaan Renewable Energy Pvt. Ltd.	5.76	-	-	7.02	4.04	-	-	-	7.02	4.04
7	Avaada Non-Conventional	94.50	-	-	3.12	29.50	-	-	-	3.12	29.50
8	Azure Surya Private Limited.	18.05	-	-	8.99	16.23	-	-	-	8.99	16.23
9	BILHAUR2_SOLAR	-	-	-	-	-	-	-	-	-	-
10	BILHAUR2_SOLAR_PV	-	-	-	-	-	-	-	-	-	-
11	BUNDELKHAND SAUR URJA	21.20	-	-	1.83	3.87	-	-	-	1.83	3.87
12	Dante Energy Private Limited.	2.22	-	-	14.95	3.32	-	-	-	14.95	3.32
13	Dhruv Milkose Private Limited.	0.98	-	-	17.74	1.75	-	-	-	17.74	1.75
14	Essel Urja Private Limited	88.77	-	-	9.27	82.29	-	-	-	9.27	82.29
15	Green Urja Pvt. Ltd	51.21	-	-	9.24	47.32	-	-	-	9.24	47.32
16	JAKSON AGRA 50MW	49.19	-	-	3.66	17.99	-	-	-	3.66	17.99
17	Jakson Power Private Limited	38.71	-	-	3.44	13.30	-	-	-	3.44	13.30

S.No	Source of Power (Station wise)	FY 2022-23									
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable charge		Annual Other Cost		Late payment	Total cost	
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)
18	K.M. Energy Pvt. Ltd	8.85	-	-	9.25	8.19	-	-	-	9.25	8.19
19	KILAJ SOLAR (MAHARASHTRA)	7.81	-	-	7.02	5.48	-	-	-	7.02	5.48
20	Lohia Developers (India) Pvt. Ltd.	30.26	-	-	2.89	8.76	-	-	-	2.89	8.76
21	Maheswari Mining & Energy pvt Ltd	-	-	-	-	-	-	-	-	-	-
22	Nirosha Power Pvt. Ltd	53.04	-	-	8.93	47.37	-	-	-	8.93	47.37
23	NTPC Auraiya Solar	490.49	-	-	3.03	148.66	-	-	0.95	3.05	149.61
24	NTPC Green Energy	45.31	-	-	3.11	14.10	-	-	-	3.11	14.10
25	PINNACLE RENEWABLE ENERGY (SITAPUR)	6.28	-	-	5.05	3.17	-	-	-	5.05	3.17
26	Priapus Infrastructure Limited.	2.36	-	-	17.91	4.22	-	-	-	17.91	4.22
27	PSPN Synergy Pvt. Ltd.	25.71	-	-	7.02	18.05	-	-	-	7.02	18.05
28	Refex Energy (Rajasthan) Pvt. Ltd	17.87	-	-	9.24	16.51	-	-	-	9.24	16.51
29	Sahashradhara Energy Pvt. Ltd.	8.07	-	-	13.40	10.81	-	-	-	13.40	10.81
30	Salasar Green Energy Pvt. Ltd.	10.25	-	-	6.40	6.56	-	-	-	6.40	6.56
31	Samavist Energy Solutions Pvt. Ltd	17.52	-	-	9.33	16.35	-	-	-	9.33	16.35
32	SECI, SAKET NEW DELHI	3,232.52	-	-	2.97	960.24	-	-	11.44	3.01	971.68
33	Spinel Energy Infrastructure Limited.	37.53	-	-	7.55	28.32	-	-	-	7.55	28.32
34	Sukhbir Agro (1) Lalitpur UP. (10 MW)	17.22	-	-	7.02	12.09	-	-	-	7.02	12.09
35	Sukhbir Agro (2) Lalitpur UP. (20 MW)	35.64	-	-	7.02	25.02	-	-	-	7.02	25.02
36	Sukhbir Agro (3) Mahoba UP. (20 MW)	35.32	-	-	7.02	24.80	-	-	-	7.02	24.80

S.No	Source of Power (Station wise)	FY 2022-23									
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable charge		Annual Other Cost		Late payment	Total cost	
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)
37	Sukhbir Agro Energy Ltd. Chitrakoot UP (50MW)	152.47	-	-	3.13	47.80	-	-	-	3.13	47.80
38	SUN N Wind Infra Energy Pvt. Ltd.	18.50	-	-	9.27	17.15	-	-	-	9.27	17.15
39	SJVN Green Energy ltd.	49.51	-	-	2.67	13.23	-	-	-	2.67	13.23
40	TA GREENTECH PVT. LTD.	16.97	-	-	5.07	8.60	-	-	-	5.07	8.60
41	Taletutayi Solar Projects Five	103.06	-	-	3.08	31.77	-	-	-	3.08	31.77
42	Technical Associate Limited.	2.72	-	-	17.91	4.87	-	-	-	17.91	4.87
43	TN Urja Pvt. Ltd	88.69	-	-	7.02	62.26	-	-	-	7.02	62.26
44	TATA Power Renewable Energy Ltd. (Banda)	100.24	-	-	3.30	33.03	-	-	-	3.30	33.03
45	TERRA LIGHT KANJI SOLAR	14.04	-	-	8.44	11.85	-	-	-	8.44	11.85
46	Universal Saur Urja Private Limited.	55.77	-	-	9.33	52.03	-	-	-	9.33	52.03
47	UP NEW & RENEWABLE ENERGY	40.54	-	-	4.75	19.26	-	-	-	4.75	19.26
	Sub-Total	5,518.02	-	-	3.82	2,105.67	0.04	19.77	31.15	3.91	2,156.59
G	Non-Solar (Renewable)										
I	WIND										
1	Adani Green Energy MP LTD. (PTC)	175.67	-	-	2.84	49.94	-	-	-	2.84	49.94
2	GREEN INFRA WIND POWER (PTC)	283.05	-	-	3.53	99.92	-	-	-	3.53	99.92
3	MYTRAH VAYU (PTC)	212.42	-	-	3.53	74.99	0.64	13.62	-	4.17	88.61
4	OSTRO KUTCH POWER (PTC)	299.83	-	-	3.53	105.83	-	-	-	3.53	105.83
5	WIND ONE RENERGY Pvt. Ltd. (PTC)	85.81	-	-	3.53	30.29	-	-	-	3.53	30.29

S.No	Source of Power (Station wise)	FY 2022-23									
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable charge		Annual Other Cost		Late payment	Total cost	
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)
6	WIND TWO RENERGY Pvt. Ltd. (PTC)	73.67	-	-	3.53	26.01	-	-	-	3.53	26.01
7	RENEW POWER (SECI)	261.45	-	-	2.71	70.94	-	-	-	2.71	70.94
8	SPRING RENEWABLE ENERGY PVT. LTD. (SECI)	755.09	-	-	2.58	194.81	-	-	-	2.58	194.81
9	VIVID SOLAIRE ENERGY PVT. LTD. (SECI)	217.28	-	-	2.49	54.00	-	-	-	2.49	54.00
10	ADANI Wind Energy Three, KUTCH (SECI)	280.30	-	-	2.89	81.01	-	-	-	2.89	81.01
	Sub-Total	2,644.57	-	-	2.98	787.73	0.05	13.62	-	3.03	801.35
II	Biomass Existing										
1		-	-	-	-	-	-	-	-	-	-
2		-	-	-	-	-	-	-	-	-	-
	Sub-total	-	-	-	-	-	-	-	-	-	-
III	MSW										
1											
2											
	Sub-Total	-	-	-	-	-	-	-	-	-	-
H1	NVVN + NSM (Thermal)	784.10	-	-	4.38	343.34	0.08	6.04	0.07	4.46	349.45
H2	NVVN + NSM (Solar))	369.94	-	-	6.38	235.92	0.46	17.01	0.73	6.86	253.67
I	Reactive Energy Charges	-	-	-	-	-	-	12.21	-	-	12.21
J	Banking	-	-	-	-	14.70	-	-	0.00	-	14.70
	RUVNL	-	-	-	-	0.08	-	-	-	-	0.08
	MPPMCL	-	-	-	-	14.62	-	-	0.00	-	14.62
	Sub-total	1,154.05	-	-	5.15	593.97	0.31	35.26	0.80	5.46	630.03

S.No	Source of Power (Station wise)	FY 2022-23									
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable charge		Annual Other Cost		Late payment	Total cost	
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)
	Transmission Charges										
M	PGCIL / POSOCO Charges	-	-	-	-	-	-	5,446.55	7.84	-	5,454.39
N	WUPPTCL Charges	-	-	-	-	-	-	832.99	-5.21	-	827.77
O	SEUPPTCL Charges	-	-	-	-	-	-	258.37	-	-	258.37
i	POWER GRID TRANSMISSION	-	-	-	-	-	-	91.52	-	-	91.52
ii	GHATAMPUR TRANSMISSION LTD.	-	-	-	-	-	-	116.66	-8.69	-	107.97
	OBRA BADAUN TRANSMISSION LTD.	-	-	-	-	-	-	83.38	9.63	-	93.01
	Power Grid Rampur Sambhal Trans. (PRSTL)	-	-	-	-	-	-	15.87	-	-	15.87
	UP SLDC CHARGES	-	-	-	-	-	-	0.04	-	-	0.04
	MPPTCL	-	-	-	-	-	-	0.02	-	-	0.02
	NOAR	-	-	-	-	-	-	1.21	0.00	-	1.21
	Sub-total	-	-	-	-	-	-	6,846.60	3.56	-	6,850.16
	Transmission Charges for Competitive Bidding Stations										
a.	KSK Mahaanadi	-	-	-	-	-	-	-	-	-	-
b	MB Power	-	-	-	-	-	-	-	-	-	-
c	TRN	-	-	-	-	-	-	-	-	-	-
d	RKM Power	-	-	-	-	-	-	-	-	-	-
	Sub-total	-	-	-	-	-	-	-	-	-	-
	Other Charges	-	-	-	-	-	-	-	-	-	-1,014.64
P	RRAS	-	-	-	-	-	-	-	-	-	-

S.No	Source of Power (Station wise)	FY 2022-23									
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable charge		Annual Other Cost		Late payment	Total cost	
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)
	Less	-	-	-	-	-	-	-	-	-	-
	Late Payment Surcharge	-	-	-	-	-	-	-	-	-	-
	Grand Total	1,37,289.50	1.63	22,311.42	2.68	36,824.41	0.70	9,606.26	583.62	4.98	68,311.07

2.4.2. The Petitioner requests the Hon'ble Commission to kindly approve the power purchase cost and quantum as shown in the table above.

- 2.4.3. The Petitioner has claimed the power purchase cost for FY 2022-23 based on actual payables as per the books of account for FY 2022-23. The allowable power purchase quantum for FY 2022-23 is shown in the table below:

TABLE 2-7 POWER PURCHASE COST FOR FY 2022-23

Particulars	Approved in T.O. dtd. 20.07.2022	Claimed
Allowable Power Purchase (MU)	24285.30	27347.28
Average Rate (Rs./kWh)/ DBST	5.47	5.73
Power Purchase Cost (Rs. Cr.)	13274.08	15677.33

- 2.4.4. The Petitioner requests the Hon'ble Commission to allow the Power Purchase quantum and power purchase cost for FY 2022-23 as claimed in the table above.

2.5. Intra-State Transmission Charges

- 2.5.1. The actual Transmission charges (including SLDC charges) is shown in the Table below:

TABLE 2-8 INTRA-STATE TRANSMISSION CHARGES FOR FY 2022-23

Particulars	Unit	Approved in T.O. dtd. 20.07.2022	Claimed
Units Wheeled (Energy Input into Transmission- Distribution Interface)	MU	24285.30	27347.28
Transmission Charges	Rs Crore	598.67	692.73

- 2.5.2. The Petitioner requests the Hon'ble Commission to allow transmission charges for FY 2022-23 as claimed in the above table based on Audited Accounts for FY 2022-23.

2.6. Operation and Maintenance Expenses

- 2.6.1. The Operation & Maintenance (O&M) Expenses comprises of Employee Expenses, Repair & Maintenance (R&M) Expenses and Administrative and General (A&G) Expenses.
- 2.6.2. Regulation 45 of UPERC MYT Regulations, 2019, stipulates the detailed methodology for determination of Operation & Maintenance (O&M) Expenses for the Control Period from FY 2020-21 to FY 2024-25.

The detailed methodology as stated in Regulation 45 is reproduced as under:

Quote

“45 Operation and Maintenance Expenses

a) *The Operation and Maintenance expenses for the Distribution Business shall be computed as stipulated in with these Regulations.*

b) *The Operation and Maintenance expenses shall be derived on the basis of the average of the Trued-Up values (without efficiency gain / loss) for the last five (5) financial years ending March 31, 2019 subject to prudence check by the Commission. However, if Trued-Up values (without efficiency gain / loss) are not available for FY 2018-19, then last five (5) available Trued-Up values (without efficiency gain / loss) will be considered and subsequently when the same are available the base year value (i.e. FY 2019-20) will be recomputed*

c) *The average of such operation and maintenance expenses shall be considered as Operation and Maintenance expenses for the middle year and shall be escalated years-on-year with the escalation factor considering CPI and WPI of respective years in the ratio of 60:40, for subsequent years up to FY 2019-20.*

d) *The One-time expenses such as expense due to change in accounting policy, arrears paid due to Pay Commissions, etc., and the expenses beyond the control of the Distribution Licensee such as dearness allowance, terminal benefits, etc., in Employee cost, shall be allowed by the Commission over and above normative Operation & Maintenance Expenses after prudence check.*

e) *At the time of Truing-up of the O&M expenses, the actual point to point inflation over Wholesale Price Index numbers as per Office of Economic Advisor of Government of India and the actual Consumer Price Index for Industrial Workers (all India) as per Labour Bureau, Government of India, in the concerned year shall be considered.*

45.1 Employee Cost

Employee cost shall be computed as per the following formula escalated by consumer price index (CPI), adjusted by provisions for expenses beyond the control of the Licensee and one-time expected expenses, such as recovery / adjustment of terminal benefits, implications of Pay Commission, arrears, Interim Relief, etc.:

$$EMP_n = EMP_{n-1} \times (1 + \text{CPI inflation})$$

Where:

EMP_n: Employee expense for the nth year;

EMP_{n-1}: Employee expense for the (n-1)th year;

CPI inflation is the average of Consumer Price Index (CPI) for immediately preceding three Financial Years.

45.2 Repairs and Maintenance Expense

Repairs and Maintenance expense shall be calculated by following formula:

$$R\&Mn = R\&Mn-1 (1 + \text{WPI inflation})$$

Where:

R&Mn: Repairs & Maintenance expense for the nth year;

R&Mn-1: Repairs & Maintenance expense for the (n-1)th year;

WPI inflation is the average of Wholesale Price Index (WPI) for immediately preceding three Financial Years.

45.3 Administrative and General Expense

A&G expense shall be computed as per the following formula escalated by wholesale price index (WPI) and adjusted by provisions for confirmed initiatives (IT etc. initiatives as proposed by the Distribution Licensee and validated by the Commission) or other expected one-time expenses:

$$A\&Gn = A\&Gn-1 (1 + \text{WPI inflation})$$

Where:

A&Gn: A&G expense for the nth year;

A&Gn-1: A&G expense for the (n-1)th year;

WPI inflation is the average of Wholesale Price Index (WPI) for immediately preceding three Financial Years: Provided that Interest and Finance charges such as Credit Rating charges, collection facilitation charges, financing cost of Delayed Payment Surcharge and other finance charges shall be a part of A&G expenses.

Illustration: For FY 2020-21, (n-1) th year will be FY 2019-20 which is also the base year.

Unquote

2.6.3. It is submitted that the Hon'ble Commission has disallowed the O&M expenses claimed by the Petitioner in Tariff Order dated 20.07.2022 for ARR of FY 2022-23 and consequentially in Tariff order dated 24.05.2023 for ARR FY 2023-24 owing to the following: -

- (a) The Hon'ble Commission has arrived at the mid-year (FY 2016-17) value of each component of O&M expenses based on the average of last 5 years trued-up values of FY 2014-15 to FY 2018-19. The mid-year value of each component of O&M expenses has been escalated year on year with the escalation factor

considering Consumer Price Index (CPI) and Whole-sale Price Index (WPI) of respective years in the ratio 60:40, for subsequent years up to FY 2019-20.

- (b) Accordingly, the Hon'ble Commission has computed the O&M expenses of the base year which shall be escalated at Inflation/Escalation rate notified by Labour Bureau, Govt. of India (http://labourbureau.gov.in/LBO_indexes.htm) and Economic Advisor Govt. of India (<https://eaindustry.nic.in/>) respectively for different years.

Accordingly, the Hon'ble Commission has computed the average WPI and CPI inflation of the last 3 years (average) at 2.42% and 6.00%, respectively.

- (c) In terms of this methodology: -
- (i) Employee Expenses for FY 2022-23 have been computed by escalating the base year (FY 2019-20) employee expenses by average CPI inflation of last 3 years.
 - (ii) The A&G Expenses (including Finance Charges) and R&M Expenses for FY 2022-23 have been computed by escalating the base year (FY 2019-20) by average WPI inflation of last 3 years.

2.6.4. At the outset, it is submitted that O&M expenses comprise of employee related costs, A&G expenses and R&M expenditure. Further, Petitioner intend to recover their legitimate actual O&M Expenses and do not intend to get any additional benefit out of the same.

2.6.5. It is submitted that the O&M expenses being allowed by the Hon'ble Commission are insufficient to cover the actual cost/impact of O&M expenses likely to be incurred by the Petitioner. As such, the methodology adopted by the Hon'ble Commission will lead considerable loss to the Petitioner whose financial condition is already precarious and stressed.

2.6.6. O&M expenses are computed on normative basis in terms of the norms prescribed under the Tariff Regulations. It is submitted that the methodology prescribed by the Hon'ble Commission for computation of normative O&M expenses is significantly different in MYT Regulations, 2019 as compared to the methodology provided under the erstwhile regime i.e., MYT Regulations, 2014.

2.6.7. It is submitted that under the MYT Regulations 2014 computation of O&M expenses was based on the trajectory of norms derived on

average of past five years audited figures. It is noteworthy that the draft MYT Regulations, 2019 issued by the Hon'ble Commission also had similar provisions for computation of O&M expenses. However, in the final MYT Regulations 2019, the Hon'ble Commission has completely changed the methodology and adopted a completely new methodology for computing the O&M expenses, which is based on escalation factor considering CPI and WPI based on the average of last 5 years trued-up values (that too without consideration of efficiency gain/losses on O&M expenses). Such a change was affected without giving any opportunity to the stakeholders including the Petitioner to submit their suggestions/objections on the same.

- 2.6.8. This new approach adopted by the Hon'ble Commission will result in substantial losses to the Petitioner as it is likely that the Petitioner will not be able to meet its regular expenses including employee costs, R&M expenses and A&G expenses.
- 2.6.9. It is pertinent to highlight that owing to the implementation of the Government's Saubhagya Scheme in the last three financial years (i.e., FY 2017-18 onwards), Petitioner has added a significant consumer base leading to an increase in load, extension of LT Network and backbone distribution infrastructure. Accordingly, there is resultant significant increase in the O&M expenses.
- 2.6.10. As deliberated above, computation of O&M expenses as per the methodology provided under the MYT Regulations, 2019 will cause severe financial hardship to the Petitioner.
- 2.6.11. Petitioner submits that since the Hon'ble Commission has already trued up the O&M expenses for FY 2019-20, the same shall be considered as the base value rather than deriving the base value for FY 2019-20 as stipulated in Regulation 45 of MYT Regulations, 2019. In this context, it is submitted that, the Hon'ble Commission while truing-up for FY2019-20 has Trued-up O&M expenses and computations done by the Hon'ble Commission on the O&M expenses in the Tariff Order dated 29.07.2021 for the base year value (FY 2019-20) is as under:

TABLE 2-9 TRUED UP AND BASE YEAR O&M EXPENSES FOR FY 2019-20 (IN RS. CR)

Particulars	DVVNL	MVVNL	PVVNL	PUVVNL	KESCO	Total (in Crs.)
Trued-up O&M expenses	1193.06	1433.57	1360.66	1804.31	246.43	6038.03
Computed O&M expenses	1038.11	1256.36	1117.22	1528.79	239.36	5179.84

- 2.6.12. However, Hon'ble Commission while computing the O&M expenses in the Tariff Order dated 20.07.2022 has computed the base year value (FY 2019-20) which is less than the approved O&M Expenses and the same is shown in the table above.

- 2.6.13. It can be perceived from the above data that the Hon'ble Commission has itself estimated two different O&M Expenses for the same year. Thus, the Petitioner has considered the Trued up value for FY 2019-20 as a base value for the escalation of normative O&M Expenses for FY 2020-21 and subsequently for FY 2021-22 & 2022-23 as per MYT Regulations.
- 2.6.14. The Petitioner request the Hon'ble Commission to allow the O&M Expenses in line with the methodology proposed in the instant petition which is based on the Trued up O&M Expenses for FY 2019-20 and considering the applicable CPI escalation factors (for Employee Expenses) and WPI escalation factors (R&M Expenses and A&G Expenses) for FY 2022-23, FY 2023-24 and FY 2024-25.
- 2.6.15. It is further noted that, the Hon'ble Commission has also issued the Uttar Pradesh Electricity Regulatory Commission (Standard of Performance) Regulation, 2019 dated 16.12.2019 wherein stringent norms for Standards of Performance are to be followed by the Distribution Licensee for providing various services to the consumers in a time bound manner failing which the Distribution Licensee is required to pay compensation.
- 2.6.16. Therefore, while the Hon'ble Commission has laid down stringent Standards of Performance which can only be complied with by enhancing the office and field workforce, implementation of various IT & Automation systems etc. entailing more expenditure on employees, R&M expenses and A&G expenses the prescribed norms for approval of O&M Expenses are such that even the existing manpower and facilities cannot be retained.
- 2.6.17. It is, therefore, submitted that these expenses are over and above the normative expense trajectory followed by the Hon'ble Commission. It is prayed before the Hon'ble Commission that a separate provision maybe allowed in order to reduce the hardship on account of the O&M expenses.

WPI and CPI Escalation Rates

- 2.6.18. The Petitioner has considered the CPI and WPI inflation index as per Inflation/Escalation rate notified by Labour Bureau, Govt. of India (http://labourbureau.gov.in/LBO_indexes.htm) and Economic Advisor Govt. of India (<https://eaindustry.nic.in/>) respectively. The same is also mentioned below:

TABLE 2-10 INFLATION INDICES

FY	Index		Inflation rate	
	WPI	CPI	WPI	CPI
FY 2017-18	114.88	284.42	2.92%	3.08%
FY 2018-19	119.79	299.92	4.28%	5.45%
FY 2019-20	121.83	322.50	1.70%	7.53%
FY 2020-21	123.38	338.71	1.27%	5.03%
FY 2021-22	139.41	356.06	13.00%	5.12%

FY 2022-23	152.45	377.62	9.36%	6.05%
------------	--------	--------	-------	-------

Employee Expenses

- 2.6.19. The Petitioner has considered the trued-up value for FY 2019-20 as approved by the Hon'ble Commission in Tariff Order for FY 2021-22. Thereafter, the Petitioner has considered same methodology and norms for the Truing-up of Employee Expenses for FY 2021-22 on the normative basis in terms of the norms prescribed under MYT Regulations, 2019.
- 2.6.20. It is further submitted that the Petitioner in its previous submission had mentioned that in order to improve its performance, the Petitioner has initiated the hiring of contractual person for the activities related to metering, billing and collection. Because of this the Administrative and General Expenses (A&G) expenses increased substantially from FY 2017-18. Such expenses are recorded under the head of "Payment to Contractual Person", "Incidental Stores Expenses (Expenses Incurred on revenue realization)" and "Expenses on Spot Billing Centre" under A&G Expenses. It is noteworthy to mention that expense recorded under these heads were very less prior to FY 2018.
- 2.6.21. Accordingly, the Petitioner had requested the Hon'ble Commission to recognize the said expenses as mentioned as separate items of expenses and allow the same separately as a part of Employee Expenses over and above calculated by normative approach. However, the Hon'ble Commission had not allowed the same as an addition to the normative employee expenses.
- 2.6.22. In this regard, it is hereby respectfully submitted that the Discom's employee expenses are a legitimate expense which varies due to intra Discom transfer and posting of employees. Therefore, the petitioner hereby requested the Hon'ble Commission may kindly allow the actual Employee expenses as per the balance sheet of the petitioner.
- 2.6.23. In context to this, the Hon'ble Commission is requested to consider submission of the petitioner to re-evaluation of the current normative approach to employee expenses within Discoms and consider the dynamic nature of intra Discom employee transfers and postings leads to fluctuating legitimate expenses. This adjustment is pivotal for a more precise financial representation and efficient resource allocation within Discom.
- 2.6.24. In lieu of abovementioned facts the petitioner respectfully prays to the Hon'ble Commission's consideration to allow based on actual employee expenses, as accurately reflected in our balance sheet.

TABLE 2-11 ADDITIONAL EMPLOYEE EXPENSES FOR FY 2022-23 (IN RS. CR)

Particulars	MVVNL
Normative Employee Expense	898.90

Particulars	MVVNL
Claimed: Actual as per balance sheet	814.79

Repairs & Maintenance Expenses (R&M)

2.6.25. The Petitioner has considered the trued-up value for FY 2019-20 as approved by the Hon'ble Commission is in Tariff order as base number. Thereafter, the Petitioner has considered same methodology and norms for the Truing-up of Repairs & Maintenance Expenses for FY 2022-23 on the normative basis in terms of the norms prescribed under the Tariff Regulations shown in the Table below:

TABLE 2-12 COMPUTED R&M EXPENSES FOR FY 2022-23 (IN RS. CR)

Particulars	Trued-Up Value (FY 2021-22) (Rs. Cr)	Average WPI Escalation of last 3 years.	Computed (Rs. Cr)
R&M Expenses	387.37	5.32%	407.99

2.6.26. The Normative R&M expenses approved by the Hon'ble Commission and Net R&M Expenses claimed for FY 2022-23 are shown in the Table below:

TABLE 2-13 NORMATIVE R&M EXPENSES FOR FY 2022-23 (IN RS. CR)

Sl No.	Particulars	Approved in T.O. dtd. 20.07.2022	Normative
1	Gross R&M Expenses after escalation	571.79	407.99
2	Less: R&M Expenses capitalized	-	0.00
3	Special R&M approved vide T.O. dated 20.07.2022	190.60	203.99
4	Net R&M Expenses	762.39	611.98

Administrative and General Expense (A&G)

2.6.27. The Petitioner has considered the trued-up value for FY 2019-20 as approved by the Hon'ble Commission in Tariff Order as base number. Thereafter, the Petitioner has considered same methodology and norms for the Truing-up of Administrative and General Expense for FY 2022-23 on the normative basis in terms of the norms prescribed under the Tariff Regulations shown in the Table below:

TABLE 2-14 COMPUTED A&G EXPENSES FOR FY 2022-23 (IN RS. CR)

Particulars	Trued-Up Value (FY 2021-22) (Rs. Cr)	Average WPI Escalation of last 3 years.	Computed (Rs. Cr)
A&G Expenses	322.82	5.32%	340.00

- 2.6.28. It is imperative to highlight that the Petitioner is striving to improve its performance and focusing heavily on billing and collection. In order to improve its performance, the Petitioner has initiated the hiring of contractual person for the activities related to metering, billing and collection. Because of this the Administrative and General Expenses (A&G) expenses increased substantially from FY 2017-18. Such expenses are recorded under the head of "Payment to Contractual Person", "Incidental Stores Expenses (Expenses Incurred on revenue realization)" and "Expenses on Spot Billing Centre" under A&G Expenses. It is noteworthy to mention that expense recorded under these heads were very less prior to FY 2018.
- 2.6.29. It is pertinent to highlight that the Hon'ble Commission as per provision (b) of Regulation 45 of MYT Tariff Regulations, 2019 depicts the methodology to derive O&M expenses which is based on the average of the Trued-up values for last five (5) financial years ending March 31,2019.
- 2.6.30. Further, it is important to highlight that the Petitioner started incurring high A&G expenses from FY 2018 as it started hiring of contractual person. Hence, the methodology adopted by the Hon'ble Commission suppresses the base year value as the actual / trued up expenses were very less prior to FY 2018.
- 2.6.31. Since, the Hon'ble Commission is disallowing the actual A&G expense and adopts the partial approach of approving the lower of the audited/normative figures the Petitioner incurs substantial financial loss.
- 2.6.32. Owing to such disallowance of the expenses which are in the nature of establishment expense under A&G expenses, the Petitioner has started deployment of contractual manpower for the activities like spot billing, Revenue collection to reduce its establishment nature of fixed expenditure on a long term basis and expenses recorded under such heads purely involves Man-Power, the petitioner is bound to claim such expenses separately under A&G Expenses.
- 2.6.33. In humbly requested to the Hon'ble Commission, it is imperative to underscore that, during the specified period, the petitioner has expanded substantial consumer facilities and established numerous new offices and substations within its jurisdiction. Consequently, the internal energy consumption by the petitioner has risen in comparison to historical consumption, all in a concerted effort to enhance service delivery to the consumers in the area. The Discom, with due respect, earnestly implores the Hon'ble Commission to kindly acknowledge and consider this commitment to service improvement. Therefore, a humble plea is made to allow additional provisions, separately and above the normative A&G expenses, to accommodate the increased operational demands and ensure the continued delivery of optimal services to our valued consumers.

2.6.34. Hence, the Petitioner requests the Hon'ble Commission to recognize the said expenses as mentioned below as separate items of expenses over and above the normative and allow the same separately as a part of Employee Expenses over and above calculated by normative approach.

TABLE 2-15 ADDITIONAL A&G EXPENSES FOR FY 2022-23 (IN RS. CR)

Particulars	MVVNL
Payment to Contractual Person	100.54
Expenses on Spot Billing Centre & internal energy consumption	230.02
Electricity charges to office	274.60
Total	605.16

2.6.35. The Normative A&G expenses approved by the Hon'ble Commission and Net A&G Expenses claimed for FY 2022-23 are shown in the Table below:

TABLE 2-16 NORMATIVE A&G EXPENSES FOR FY 2022-23 (IN RS. CR)

Sl No.	Particulars	Approved in T.O. dtd. 20.07.2022	Claimed
1	Gross A&G Expenses	273.70	945.16
a.	Normative A&G Expenses (after escalation)		340.00
b.	Payment to Contractual Employees & Spot Billing & internal energy consumption		330.56
c.	Electricity Charges to Office		274.60
2	Less: A&G expenses capitalized	-	-
3	Net A&G expenses	273.70	945.16

2.6.36. Based on the above submission, the summary of the Operation & Maintenance expenses (O&M) approved in the Tariff Order for FY 2022-23 vis-a-vis the actual O&M expenses as per Audited Accounts and computed as normative are shown in the table below:

TABLE 2-17 OPERATION & MAINTENANCE EXPENSES CLAIMED FOR FY 2022-23 (IN RS. CR)

Particulars	Approved in T.O. dtd. 20.07.2022	Actual (A)	Claimed (B)
Repair & Maintenance expenses	571.79	476.78	611.98
Employee expenses	773.35	814.79	814.79
Administrative and General expenses	273.7	813.04	945.16
Gross O&M Expenses	1618.84	2104.61	2,371.93
Less:			
Employee expenses capitalized	644.56	256.98	256.98
Administrative and General expenses capitalized	0	0	-
Gross expenses Capitalized*	644.56	256.98	256.98
Smart Meter Opex	0	0	24.19
Net O&M Expenses	974.28	1847.63	2,139.14

*Gross expenses Capitalized is claimed as per the book of account for FY 2022-23.

Smart Metering OPEX

- 2.6.37. It is hereby submitted that on 16.05.2018, the Hon'ble Commission directed UPPCL to submit the detailed roll out plan of installation of smart meters by UP Discoms for approval.
- 2.6.38. UPPCL submitted the smart meter roll out plan under OPEX Model to the Hon'ble Commission on 06.08.2018. In terms of the rollout plan Energy Efficiency Services Limited (EESL) will make the upfront capital investment during the built-up phase and will recover its investment out of gains of the project on OPEX basis. Accordingly, UP Discoms are required to pay monthly fee on OPEX basis as O&M expenditure to EESL on per meter per month basis. The per meter per month cost is calculated as total project cost spread over the actual recovery period, post integration of meters on per meter basis.
- 2.6.39. On 15.11.2018, Ld. UP Commission by its Order approved the Smart Meter rollout plan for State Discoms of Uttar Pradesh: -

Quote

"DISCOM will pay EESL on OPEX basis as O&M expenditure. The assets will be in the books of EESL till the transfer of assets at the end of project at zero value.

[..]

*"Since installation of Smart Meters is a national programme and has produced very encouraging financial returns in private Discoms, the Commission approves the proposed roll out plan of UPPCL and Discoms submitted before the Commission
..... "*

Unquote

- 2.6.40. Further, it is submitted that in terms of the National Tariff Policy 2016 (which has the force of law), MoP letter dated 08.09.2016 and the Hon'ble Commission's direction in Order dated 15.11.2018, UP Discoms are mandated to implement the Smart Meter rollout plan in the State of Uttar Pradesh.
- 2.6.41. The additional O&M component against this plan was computed on the basis of per meter per month rate mentioned in the above referred order of the Commission. The amount sought as 'Additional O&M Expenses under smart metering' is payable to implementation agency to cover cost towards smart meter and box installation, AMI software cost, consumer indexing, training, integration and commissioning of AMI solution.
- 2.6.42. It may be noted that this cost has been proposed to be recovered under Opex model based on per meter per month basis and there is no additional burden of depreciation, interest and return on equity on the consumer. Such expenditure qualifies as Statutory expenses. In the regulatory framework it is a settled position that Statutory expenses are uncontrollable factors and are to be allowed as pass through in

distribution tariff. As a result, thereof UP Discoms have incurred and will continue to incur substantial additional expenditure as quoted above.

- 2.6.43. It is further added that this type of expenses was not envisaged during projection of MYT O&M norms for FY 2017-18 to FY 2019-20. Further, O&M Norms approved by the Hon'ble Commission were based on five-year Audited Accounts, which didn't have any O&M expenses towards smart metering. The amount of this additional O&M has been entered as rent in the replies of comments on roll out plan submitted to Hon'ble Commission vide MD, UPPCL letter no. 352/CE(Com-II)/Smart Meter/18 dt. 25.09.2018.
- 2.6.44. In view of the above it is submitted that the Hon'ble Commission completely being aware of the cost implication qua implementation of Smart Metering Rollout Plan has approved/allowed the same by its Order dated 15.11.2018.
- 2.6.45. Further, the approach of compensating the Opex cost with likely savings in billing and collection efficiency is not justified for the Licensee. Presently, the tariff is already being determined based on 100% collection efficiency, despite the actual percentage being substantially lower. Therefore, even if billing and collection efficiency increases by installation of smart meters, the same will not have any impact on the tariff of the Discoms.
- 2.6.46. Moreover, the Hon'ble Commission in its Order dated 15.11.2018 has itself noted that the UP Discoms would incur substantial Opex cost (to be paid to EESL) towards implementation of Smart Metering Rollout Plans. Hence, there is no reason to now disallow the said cost, which is a Statutory expense and has to be mandatorily incurred by the Licensee.
- 2.6.47. It is pertinent to highlight that the smart meter roll-out plan on Opex model was submitted to Hon'ble Commission well before its implementation.
- 2.6.48. Further, Hon'ble Commission while approving the roll-out plan has not stated that the cost envisaged under the Opex model would not be allowed to be passed on in the ARR. Moreover, Hon'ble Commission in its Tariff Order dated 03.09.2019 stated that it will carry out detailed analysis of the additional O&M expenses (on account of implementation of smart meter roll out plan) for FY 2018-19 at the time of truing-up.
- 2.6.49. Accordingly, license has a legitimate expectation that after approval of the smart meter roll out plan (Opex model) the cost to be incurred by the licensees would be allowed to be recovered in tariff. Hence, such disallowance at this belated stage would be contrary to the principle of regulatory certainty, which is embedded in the Electricity Act and policies framed thereunder.
- 2.6.50. Therefore, this expense shall be considered under the head of A&G expenses as additional expenses.

- 2.6.51. The Hon'ble Commission is requested to allow the smart meter Opex estimated by the Petitioner for FY 2022-23:

TABLE 2-18 SMART METERING OPEX FOR FY 2022-23

Particulars	Smart Meters installed till Mar-22	Smart Meters installed till Mar-23	Rate (Rs./meter/month) including GST@18%	OPEX (IN RS. CR)
FY 2022-23	1,98,726	1,98,726	101.42	24.19

- 2.6.52. The Hon'ble Commission is requested to approve the same.

2.7. Capital Investment, Capitalisation and Financing

- 2.7.1. Details of the capex schemes (submitted in the MYT Formats) are shown in the Table below.

TABLE 2-19 CAPEX FOR FY 2022-23 (IN RS. CR)

Schemes	Investments	Capitalisation
Other Schemes	1854.10	1941.66
ADB	252.57	237.25
IPDS	68.17	28.07
SAUBHAGYA YOJNA	39.56	0.00
RDSS	124.96	0.00
Intangible Assets	28.34	27.98
Total(A)	2367.70	2234.96
Employee Cost Capitalised (B)	-	256.98
Interest Expenses Capitalised (C)	-	-
Total (D= A + B + C)	2367.70	2491.94

- 2.7.2. Considering the Capital Work in Progress Balances (CWIP) and Gross Fixed Asset (GFA) balances as per audited accounts, the Petitioner has derived the actual capital investments undertaken by it during FY 2022-23. The details are provided in the table below:

TABLE 2-20 CAPITAL INVESTMENT IN FY 2022-23 (IN RS. CR)

Particulars	Derivation	Approved in T.O. 20.07.2022	Claimed
Opening WIP as on 1st April	A	1,465.93	1,240.25
Investments	B	1,018.99	2,226.00
Employee Expenses capitalization	C	644.56	256.98
A&G Expenses Capitalisation	D	-	-
Interest Capitalisation on Interest on long term loans	E	198.33	-
Total Investments	F= A+B+C+D+E	3,327.81	3,723.23
Transferred to GFA (Total	G	2,434.95	2,234.96

Particulars	Derivation	Approved in T.O. 20.07.2022	Claimed
Capitalisation)			
Closing WIP	H=F-G	892.86	1,488.27

2.7.3. The Table below summarises the amounts received towards consumer contributions, capital grants and subsidies in FY 2022-23:

TABLE 2-21 CONSUMER CONTRIBUTIONS, CAPITAL GRANTS AND SUBSIDIES IN FY 2022-23 (IN RS. CR)

Particulars	Approved in T.O. dtd. 20.07.2022	Claimed
Opening Balance of Consumer Contributions, Grants and Subsidies towards Cost of Capital Assets	137.36	5,738.28
Additions during the year includes consumer contribution and grants	-	911.40
Less: Amortisation on consumer contribution part only	-	162.89
Closing Balance	137.36	6,486.79

2.7.4. As discussed in above tables, the capital investment eligible for financing after deducting consumer contribution and grant is shown in the table below. The Petitioner has considered the same approach as in previous Orders and therefore, considered the funding of capital expenditure in the ratio of 70:30. Considering this approach, 70% of the capital expenditure undertaken during the year has been financed through loan and balance 30% has been financed through equity contributions.

TABLE 2-22 FINANCING OF THE CAPITAL INVESTMENTS IN FY 2022-23 (IN RS. CR)

Particulars	Derivation	Approved in T.O. dtd. 20.07.2022	Claimed
Total Investment during the year (Asset Put to use)	A	2,434.95	2,234.96
Less:		-	-
Consumer Contribution, Grants and De-captlizations	B	-	911.40
Investment funded by debt and equity	C=A-B	2,434.95	1,323.56
Debt Funded	70% of C	1,704.47	926.49
Equity Funded	30% of C	730.49	397.07

2.8. Interest & Finance Charges

Interest on Long Term Loan

- 2.8.1. The petitioner has considered the same approach for the estimation of Interest on long Term Loan as approved by the Hon'ble Commission in its previous Tariff order. Petitioner had considered a normative tariff approach with a debt equity ratio of 70:30. Considering this approach, 70% of the capitalization undertaken (after deducting consumer contributions, capital subsidies and grants) in any year was financed through loan and balance 30% has been financed through equity contributions. The portion of capital expenditure financed through consumer contributions, capital subsidies and grants are separated and the depreciation, interest and return on equity thereon was not charged to the consumers. The amounts received as consumer contributions, capital subsidies and grants were traced from the audited accounts. Subsequently, the financing of the capital investment was worked out based on the debt equity ratio of 70:30 and allowable depreciation was considered as normative loan repayment.
- 2.8.2. The Petitioner has worked-out the interest on long term loan based on the same philosophy.
- 2.8.3. The opening balance of long term loan has been considered equivalent to the closing loan balance for FY 2021-22 as approved by the Hon'ble Commission in Tariff Order for FY 2023-24 dated 24.05.2023.
- 2.8.4. Allowable depreciation for the year has been considered as normative loan repayment. The actual weighted average rate (Details are submitted in Format F 31 of the MYT Tariff Formats) as per audited accounts has been considered for computing the eligible interest expenses.
- 2.8.5. Considering the above, the interest on long term loan has been computed below. The interest capitalisation has been considered as per audited accounts. The computations for interest on long term loan are shown in table below:

TABLE 2-23 ALLOWABLE INTEREST ON LONG TERM LOAN FOR FY 2022-23 (IN RS. CR)

Particulars	Approved in T.O. dated 20.07.2022	Claimed
Opening Loan	4515.80	3795.53
Additions (70% of Capitalization net of Consumer Contribution and Grants)	1704.46	369.54
Less: Repayments (Depreciation allowable for the year)	493.06	440.67
Closing Loan Balance	5727.20	3724.40
Weighted Average Rate of Interest	10.91%	9.68%
Interest on Long term loan	558.96	364.10
Less: Interest Capitalized	198.33	0.00
Net Interest on Loan term loan	360.63	364.10

- 2.8.6. The Petitioner requests the Hon'ble Commission to allow interest on long-term loans for FY 2022-23 as computed in above table.

Interest on Consumer Security Deposits

- 2.8.7. The Petitioner humbly submits that the actual interest on consumer security deposit paid during FY 2022-23 as per audited accounts for FY 2022-23 against the approved figures in the Tariff Order is given in the table below.

TABLE 2-24 INTEREST ON SECURITY DEPOSIT FOR FY 2022-23 (IN RS. CR)

Particulars	Approved in T.O. dated 20.07.2022	Claimed
Total Consumer Security Deposit	693.55	790.36
Interest on Security Deposit	29.05	38.71

- 2.8.8. The Petitioner requests the Hon'ble Commission to approve the consumer security deposit paid during FY 2022-23 as per audited accounts for FY 2022-23 given in the table above.

Bank and Finance Charge

- 2.8.9. The Petitioner humbly submits that is has incurred bank and finance charges as per the audited accounts for FY 2022-23 towards expenditures like bank charges, finance charges, etc. The Petitioner requests to approve the same.

TABLE 2-25 BANK AND FINANCE CHARGES FOR FY 2022-23 (IN RS. CR)

Particulars	Claimed
Bank and Finance Charges	34.49

2.9. Interest on Working Capital

- 2.9.1. The Petitioner worked-out interest on working capital for FY 2022-23 as per Regulation 25 of the Multi Year Tariff Distribution Regulations, 2019. The Regulation 25 is quoted below:

“25. Interest on Working Capital

25.2 Distribution Business

- (a) *The working capital requirement of the Distribution Business shall cover:*
- (i) *Operation and maintenance expenses for one month;*
 - (ii) *Maintenance spares at 40% of the R&M expenses for two months; and*

- (iii) *One and half month equivalent of the expected revenue from charges for use of Distribution system at the prevailing Tariff (excluding Electricity Duty);*

minus

- (iv) *Amount held as security deposits from Distribution System Users;*

Provided that for the purpose of Truing-Up for any year, the working capital requirement shall be re-computed on the basis of the values of components of working capital approved by the Commission in the Truing- Up;

- (b) *Rate of interest on working capital shall be simple interest and shall be equal to the SBI MCLR (1 Year) on October 01, 2019 plus 250 basis points:*

Provided that for the purpose of Truing-Up for any year, simple interest on working capital shall be allowed at a rate equal to the weighted average SBI MCLR (1 Year) prevailing during the concerned Year plus 250 basis points.

- (c) *Interest shall be allowed on consumer security deposits as per the provisions of the Electricity Supply Code, 2005 and its subsequent amendments/ addendums and the new Regulations made after repeal of the same.”*

2.9.2. The detailed working of Interest on Working Capital for FY 2021-22 is shown in table below:

TABLE 2-26 INTEREST ON WORKING CAPITAL FOR FY 2022-23 (IN RS. CR)

Particulars	Derivation	Approved in T.O. dtd. 20.07.2022	Claimed
One Month's O&M Expenses	A	81.19	176.25
One and half months equivalent of the expected revenue from charges for use of Distribution system at the prevailing Tariff (excluding Electricity Duty)	B	2,124.11	2,174.98
Maintenance spares @ 40% of R&M expenses for two month	C	38.12	40.80
Less: Security Deposit from consumers, if any	D	693.55	790.36
Total Working Capital Requirement	E = A+B+C-D	1,549.87	1,601.66
Interest rate (actual wt. avg. MCLR rate of SBI for FY20 Plus	F	9.50%	11.00%

Particulars	Derivation	Approved in T.O. dtd. 20.07.2022	Claimed
250 basis points)			
Interest on Working Capital	G = E x F	147.24	176.18

2.9.3. The following table summarizes the Interest and Finance charges claimed by the Petitioner as against those approved by the Hon'ble Commission in the Tariff Order for FY 2022-23.

TABLE 2-27 INTEREST AND FINANCE CHARGES FOR FY 2022-23 (IN RS. CR)

Particulars	Approved in T.O. dtd. 20.07.2022	Claimed
A: Interest on Long Term Loans		
Gross Interest on Long Term Loan	558.96	364.10
Less: Interest Capitalization	198.33	-
Net Interest on Long Term Loans	360.63	364.10
B: Finance and Other Charges	-	-
Interest on Consumer Security Deposits	29.05	38.71
Bank/ Finance Charges	-	34.49
Total Finance Charges	29.05	73.20
	-	-
C: Interest on Working Capital	147.24	176.18
	-	-
Total (A+B+C)	536.92	613.48

2.9.4. The Petitioner requests the Hon'ble Commission to approve the Interest and Finance charges as shown in the above Table.

2.10. Depreciation

- 2.10.1. It is pertinent to highlight that the Hon'ble Commission in its MYT Regulations, 2019 has changed the methodology for calculating depreciation. In erstwhile MYT Tariff Regulations, 2014 Depreciation was calculation based on WDV method whereas as per MYT Regulations, 2019 the same is calculated based on SLM method. The relevant clause of MYT Regulation, 2019 is mentioned below for reference.

Regulation 21: Depreciation

.....

*“(b) Depreciation shall be computed annually based on. the Straight- Line Method at the rates stipulated in the **Annexure- A** to these Regulations.”*

.....

- 2.10.2. The Hon'ble Commission has also directed the licensees to maintain a separate individual asset wise Gross Block and Depreciation for assets capitalized after 1.4.2020 and separately from the Gross Block before 01.04.2020. Accordingly, from FY 2020-21 onwards the licensees have maintained two separate Gross Blocks one for assets up to 31.03.2020 (Part-A) and second for assets after 01.04.2020 (Part B) from 01.04.2020 onwards.
- 2.10.3. To calculate the depreciation for Part- A for assets capitalised before 01.04.2020, the petitioner has taken last Commission approved closing GFA for Part-A. This closing GFA is considered as Opening GFA for FY 2020-21 so that the depreciation can be calculated by SLM methodology in line with regulation of the Hon'ble Commission.
- 2.10.4. The Petitioner has computed the allowable depreciation expense on the GFA base as per audited accounts for FY 2022-23 and at the rates stipulated by Hon'ble Commission in Annexure A of MYT Regulations, 2019. The Petitioner has computed the depreciation only on the depreciable asset base and has excluded the non-depreciable assets such as land, land rights, etc. Further, the Petitioner has traced the figures in respect of depreciation charged on assets created out of consumer contributions, capital grants and subsidies from the audited accounts for FY 2022-23. This equivalent depreciation amounting has been reduced from the allowable depreciation for FY 2022-23. Moreover, the depreciation has been

calculated in two parts (Part A & B) for the asset blocks depreciated before 01.04.2020 and asset blocks depreciated as on 01.04.2020 as per the SLM methodology prescribed in MYT Regulations, 2019. The deduction is GFA is considered as per actual. Addition to GFA is considered in GFA for assets after 01.04.2020. The Petitioner requests the Hon'ble Commission to approve the same. Considering this philosophy, the gross entitlement towards depreciation has been computed as shown in the Tables below:

TABLE 2-28 GROSS ALLOWABLE DEPRECIATION FOR FY 2022-23 (IN RS. CR) PART A

GROSS ALLOWABLE DEPRECIATION FOR ASSETS BEFORE 01.04.2020 OF MVVNL FOR FY 2022-23 (IN RS. CR) PART A								
S.No.	Particulars	Opening GFA (as on 31.03.2022)	Cumulative Depreciation	Deduction to GFA	Closing GFA	Average GFA	Depreciation Rate	Allowable Gross Depreciation
1	Land on lease	1.07	-	-	1.07	1.07	-	-
2	Buildings	182.32	-	-	182.32	182.32	0.03	6.09
3	Other Civil Works	14.27	-	-	14.27	14.27	0.03	0.48
4	Plants & Machinery	-294.51	-	259.62	-554.13	-424.32	0.05	-22.40
5	Lines, Cables, Networks etc.	3,902.36	-	27.11	3,875.25	3,888.81	0.05	205.33
6	Vehicles	5.55	-	-	5.55	5.55	0.06	0.35
7	Furniture & Fixtures	9.59	-	-	9.59	9.59	0.06	0.61
8	Office Equipment's	76.48	-	-	76.48	76.48	0.06	4.84
9	Capital Expenditure on Assets not belonging to utility	-	-	-	-	-	-	-
10	Total Fixed Assets	3,897.13	-	286.73	3,610.40	3,753.77	0.05	195.29
11	Less: Consumer Contribution Amortised	-	-	-	-	-	-	-
12	Net Allowable Depreciation	3,897.13	-	286.73	3,610.40	3,753.77	0.05	195.29

TABLE 2-29 GROSS ALLOWABLE DEPRECIATION FOR FY 2022-23 (IN RS. CR) PART B

GROSS ALLOWABLE DEPRECIATION FOR ASSETS AFTER 01.04.2020 OF MVVNL FOR FY 2022-23 (IN RS. CR) PART B

S.No.	Particulars	Opening GFA net of Grant (as on 01.04.2022)	Addition to GFA	Deduction of Grants	Deduction to GFA	Closing GFA	Average GFA	Depreciation Rate	Allowable Gross Depreciation
1	Land & Land Rights	0.31	-		-	0.31	0.31	-	-
2	Buildings	112.24	4.95		-	117.19	114.72	0.03	3.83
3	Other Civil Works	4.16	-		-	4.16	4.16	0.03	0.14
4	Plant & Machinery	1,668.54	1,504.28		460.81	2,712.01	2,190.28	0.05	115.65
5	Lines, Cables, Network etc.	5,095.37	668.58		48.11	5,715.84	5,405.60	0.05	285.42
6	Vehicles	1.85	0.30		-	2.15	2.00	0.06	0.13
7	Furniture & Fixtures	4.04	0.43		-	4.47	4.26	0.06	0.27
8	Office Equipments	30.58	28.44		-	59.02	44.80	0.06	2.84
9	Capital Expenditure on Assets not belonging to utility	-	-		-	-	-	-	-
10	Total Fixed Assets	6,917.09	2,206.98		508.92	9,124.07	8,020.58	0.05	408.26
11	Non depreciable assets (Land & Land Rights)	-	-		-	-	-	-	-
12	Depreciable assets	6,917.09	2,206.98		508.92	9,124.07	8,020.58	0.05	408.26

- 2.10.5. Accordingly, the depreciation as approved by the Hon'ble Commission in its Tariff Order FY 2022-23 and as computed above is shown as under:

TABLE 2-30 NET ALLOWABLE DEPRECIATION FOR FY 2022-23 (IN RS. CR)

Particulars	Approved in T.O. dtd. 20.07.2022	Claimed
Gross Allowable Depreciation	493.06	603.56
Less: Equivalent amount of depreciation on assets acquired out of the Consumer Contribution and GoUP Subsidy	0.00	162.89
Net Allowable Depreciation	493.06	440.67

2.11. Provision for Bad and Doubtful Debts

- 2.11.1. The Regulation 46 of the MYT Distribution Regulations, 2019 provides for expenses under bad and doubtful debts to the extent of 2% of the revenue receivables as specified below:

“46.1. For any Year, the Commission may allow a provision for write off of bad and doubtful debts up to 2% of the amount shown as Revenue Receivables from sale of electricity in the audited accounts of the Distribution Licensee for that Year or the actual write off of bad debts, whichever is less:

Provided further that such provision allowed by the Commission for any Year shall not exceed the actual provision for write off of bad and doubtful debts made by the Distribution Licensee in the audited accounts of that Year:

Provided that the Commission, in its ARR / Tariff Order, may provisionally approve provision for write off of bad and doubtful debts based on the actual provision for write off of bad and doubtful debts made by the Distribution Licensee in the latest Audited Accounts available for the Petitioner, and as allowed by the Commission:

Provided further that if subsequent to the write off of a particular bad debt, revenue is realised from such bad debt, the same shall be included under the Non-Tariff Income of the year in which such revenue is realised.”

- 2.11.2. The Petitioner has computed bad and doubtful debts at 2% of the revenue receivables as per audited accounts of FY 2022-23.

TABLE 2-31 ALLOWABLE PROVISION FOR BAD AND DOUBTFUL DEBTS FOR FY 2022-23 (IN RS. CR)

Particulars	Approved in T.O. dtd. 20.07.2022	Claimed
Total Revenue Receivables from Retail Sales	16,992.85	13,707.75

Particulars	Approved in T.O. dtd. 20.07.2022	Claimed
% of Provision for Bad and Doubtful Debts	0.91%	2.00%
Bad and Doubtful Debts as per governing regulations	154.20	274.16
Bad and Doubtful Debts as per Audited Account	NA	4,174.86
Bad Debt Claimed	NA	274.16

2.11.3. The Petitioner requests to approve the bad debts claimed in above Table.

2.12. Return on Equity

2.12.1. The Regulation 22 of the Distribution MYT Regulations, 2019 provides for return on equity @15% as specified below:

“22.1 Return on equity shall be computed in Rs. terms on equity base at the rate of 14.5% post-tax per annum for the Transmission Licensee and at the rate of 15% post-tax per annum for Distribution Licensee respectively as determined in accordance with Regulation 20:

Provided that assets funded by Consumer Contribution / Deposit works, Capital Subsidies / Grants and corresponding Depreciation shall not form part of the Capital Cost. Actual Equity infused by the Licensee as per book value shall be considered and shall be used for computation in these Regulations.”

2.12.2. The Petitioner has considered closing equity approved by the Hon’ble Commission in its true up Order for FY 2021-22 as opening for FY 2022-23. Equity addition during the year has been considered 30% of GFA addition during the year net of consumer contribution, capital subsidies/ grants and de-captlization.

2.12.3. The Return on Equity (RoE) for FY 2022-23 is shown below:

TABLE 2-32 RETURN ON EQUITY ROE FOR FY 2022-23 (IN RS. CR)

Particulars	Approved in T.O. dtd. 20.07.2022	Claimed
Opening Equity	3,562.75	3,423.86
Additions (30% of Capitalization net of Consumer Contribution, Grants and de-captlization)	730.48	158.37
Closing Equity	4,293.23	3,582.23
Rate of Return on Equity (%)	15%	15%
Allowable Return on Equity	589.20	525.46

- 2.12.4. The Petitioner requests the Hon'ble Commission to approve the RoE as claimed in the above Table.

2.13. Revenue from Sale of Power

- 2.13.1. The audited accounts have reported the actual revenue from sale of power to be **Rs. 13,707.75 Crores** towards electricity Sales of **23228.10 MUs**. The petitioner requests the Hon'ble Commission to approve the same.

2.14. Non-Tariff Incomes (NTI)

- 2.14.1. Hon'ble BERC in its TO dated: 26, March 2021 has allowed the Discom of Bihar not to treat Financing Cost of DPS as NTI. Further the financing cost incurred on the principal amount on which the DPS was charges was reduced from Total NTI to arrive at Net NTI. The relevant extract of the same is mentioned below:

“4.21.23 Petitioners, in their submission, have considered the financing cost on DPS (Rs. 134.66 Crore for NBPDC and Rs. 60.15 Crore for SBPDCL) and adjusted the same against the non-tariff income and net non-tariff income claimed in truing up for FY 2019-20. Commission found the claim of petitioner's in line with the methodology considered by the Commission for financing of outstanding dues and the judgment of the APTEL dated 30 July, 2010 in Appeal No. 153 of 2009 between North Delhi Power Ltd. Vs DERC. The Judgement given by APTEL is as below- Para 58(i). Therefore, the State Commission is directed to rectify its computation of the financing cost relating to the late payment surcharge for the FY 2007-08 at the prevalent market lending rate during that period keeping in view the prevailing Prime Lending Rate.”

- 2.14.2. Furthermore, it can also be seen from above para that Ld. Bihar Commission has relied on APTEL Judgment dated 30 July, 2010 wherein the state commission of Delhi was directed to rectify the computation of financing cost relating to DPS.
- 2.14.3. The Petitioner has recorded the below amount under impact of UPERC Facilitation of Telecommunication Regulations, 2022 against renting of its assets for telecommunication/5G activities as per the practise the same has been captured in the balance sheet of the FY 2022-23 under miscellaneous receipt. It is submitted that the impact of revenue realized as per the regulation only 70% of the revenue realized under these activities has been considered under NTI.

TABLE 2-33 Revenue Realized under Renting of Pole/5G Activities FY 2022-23 (IN RS. CR)

S.No.	Particulars	Abstract of Capital Cost 2021-22
		Approved upon Truing Up

		MVVNL
1	Revenue Relized under Renting of Pole/5G Activities	26.51
2	Revenue under these activities considered under NTI	18.56

2.14.4. It is pertinent to highlight that the Hon'ble Commission in its last Tariff Order directed to demonstrate the genuineness and need of financing DPS for allowing the same. It is submitted that Principal amount on which the DPS was charged to consumers was Rs. 335.78 Cr. which is substantially high and cannot be managed by working capital. Hence financing of DPS was required to carry out the smooth working of Discom. The Discom has incurred Rs. 153.90 Cr as per Rate of Interest used to calculate Interest on working capital. This expense incurred is towards the financing of DPS for smooth operation.

2.14.5. Accordingly, the Petitioner is claiming the financing costs of DPS as shown in the Table below:

TABLE 2-34 FINANCING COSTS OF DPS FOR FY 2022-23 (IN RS. CR)

Particulars	FY 2022-23
Delayed payment Surcharge Received	335.78
DPS grossed-up at 2% per month	24.00%
Amount after grossing-up of DPS	1,399.08
Applicable interest rate for working capital finance	11.00%
Financing costs of DPS	153.90

2.14.6. Further the Petitioner has worked out the additional interest incurred for funding the Cash gap due to delay in payment by consumers, etc. as shown in table below. The same is worked out from the Audited balance sheet of the petitioner.

TABLE 2-35 ADDITIONAL INTEREST INCURRED FOR FUNDING FY 2022-23 (IN RS. CR)

Total Interest Incurred in FY 2022-23 (Rs. Cr) (A)	Total Interest and Finance Charges claimed (Rs. Cr) (B)	Additional Interest incurred by Discoms for funding the Cash gap due to delay in payment by consumers, etc (Rs. Cr.) [A-B]
1,808.45	613.48	1,194.97

2.14.7. However, the Petitioner is claiming only Normative Financing Cost of DPS as show in above Paras.

2.14.8. The approved and claimed non-tariff income is shown in table below:

TABLE 2-36 NON- TARIFF INCOME FOR FY 2022-23 (IN RS. CR)

Particulars	Approved in T.O. dated 20.07.2022	Claimed
Income form Investment		
Fixed Deposit / DPS		335.78
Rents		0.09
Interest income on loans / advances to employees;		0.02
Interest on Advances to Suppliers / Contractors		0.00
Miscellaneous Receipts from consumers		48.07
Less: Financing cost of DPS		153.90
Total	38.06	272.42

2.14.9. The Petitioner requests the Hon'ble Commission to allow the cost of financing of DPS as a part of the Non-Tariff income claimed in above Table.

2.15. GoUP Subsidy

2.15.1. The details of GoUP subsidy for FY 2022-23 as approved by the Commission in Tariff Order dated July 20, 2022 and as submitted by State Discoms for FY 2022-23 is shown in the Table below:

TABLE 2-37 GOUP SUBSIDY FOR FY 2022-23 (IN RS. CR)

Particulars	Actual Receipt
MVVNL	3692.08

2.16. Aggregate Revenue Requirement (ARR) for FY 2022-23

2.16.1. The Aggregate Revenue Requirement for FY 2021-22 after final truing up is summarised in the table below:

TABLE 2-38 AGGREGATE REVENUE REQUIREMENT (ARR) FOR FY 2022-23 (IN RS. CR)

S.No	Particulars	True-Up Year FY 2022-23		
		Approved in TO dated 20.07.2022	Audited	Claimed
I.	Power Purchase or Energy Available at Discom Periphery (MU)	24,285.30	27,347.28	27,347.28
II.	Sale of Power (MU)	21,703.77	23,228.10	23,228.10

S.No	Particulars	True-Up Year		
		FY 2022-23		
		Approved in TO dated 20.07.2022	Audited	Claimed
III.	Distribution Loss (%)	0.11	0.15	0.15
A	Expenditure			
a	Cost of Power Procurement	13,274.08	15,677.33	15,677.33
b	Transmission and Load Dispatch Charges	598.67	692.73	692.73
c	Gross O&M Expenses			
i	R&M Expense	571.79	476.78	611.98
ii	Employee Expenses	773.35	814.79	814.79
iii	A&G Expense	273.70	813.04	945.16
e	Total Gross O&M expenses (i+ii+iii)	1,618.84	2,104.61	2,371.93
f	Smart Metering OPEX	-	-	24.19
g	Depreciation	493.06	839.51	440.67
h	Interest on Long-Term Loan	558.96	223.57	364.10
i	Interest on Security Deposit from Consumers and Distribution system Users	29.05	38.71	38.71
j	Finance/Bank Charges	-	34.49	34.49
k	Interest on Working Capital	147.24	1,511.68	176.18
l	Bad and Doubtful debts	154.20	4,174.86	274.16
m	Return on Equity	589.20	-	525.46
n	Income Tax	-	-	-
	Total Expenditure (A)	17,463.30	25,297.49	20,619.94
	Less:			
o	Interest Capitalisation	198.33	-	-
p	Employee Capitalisation	644.56	256.98	256.98
B	Net Expenditure (A-q-r)	16,620.41	25,040.51	20,362.96
C	Less: Non Tariff Income	38.06	434.27	272.42
D	Net Annual Revenue Requirement of Licensee(B-C)	16,582.35	24,606.24	20,090.54
	Receipts	-	-	-
a	Revenue Assessment at Payable Tariff	16,992.85	13,707.75	13,707.75
b	Income from other Business	-	-	-
c	Revenue from Open Access Customers	-	-	-
E	Total Revenue (a+b+c)	16,992.85	13,707.75	13,707.75
F	(Shortfall)/Excess before tariff revision impact (E-D)	410.50	(10,898.49)	(6,382.79)
G	Govt. Subsidy Received/Declared	-	3,692.08	3,692.08
H	(Shortfall)/Excess(H+J)	410.50	(7,206.41)	(2,690.71)

3. Annual Performance Review (APR) for FY 2023-24

3.1. Consumption Parameters: Consumer Numbers, Connected Load and Sales

- 3.1.1. It is submitted that there is deviation in approved sales and revised sales for FY 2023-24. Further, Sales are derivative of demand which is also uncontrollable in nature.
- 3.1.2. The Category-wise approved billing determinants vis-à-vis revised billing determinants for FY 2023-24 is shown in the Table below:

TABLE 3-1: REVISED CONSUMPTION PARAMETERS FOR FY 2023-24

Category	Approved			Revised Estimate		
	Consumers (Nos)	Load (kW)	Sales (MU)	Consumers (Nos)	Load (kW)	Sales (MU)
LMV-1 Domestic Light Fan & Power	8980584	11022307	7288	8502773	10640035	14011.69
LMV-2-Non Domestic Light Fan & Power	461316	1387933	1034.36	489151	1433649	1993.77
LMV-3 Public Lamps	974	86397	39.93	2234	73439	303.16
LMV-4 Light, Fan & Power for Public/Private Institution	38681	183103	291.31	54360	193126	319.44
LMV-5 Private Tube Well/Pumping Sets	277876	1666927	3613.07	291805	1525123	2631.24
LMV-6 Small & Medium Power upto 100 hp/75kw	35324.4	384499	728.81	32444	356728	564.53
LMV-7 Public Water Works	15840	276654	362.4	15816.47	256337	1365.02
LMV-9 Temporary Supply	9206	25190	642.34	11546	26732	39.06
LMV- 10 Departmental Employees	25342	83194	6.01	-	0	-
LMV -11 Electrical Vehicles	34	7162	140.48	128	9180	7.58
HV-1 Non Industrial Bulk Load	1551	525865	-	1691	548543	1016.14
HV-2 Large & Heavy Power above 100 BHP (75 kW)	2556	932550	300.18	2727	948344	2055.32
HV-3 Railway Traction	2	9334	3424.59	2	12829	34.03
HV-4 Lift Irrigation & P. Canal above 100BHP (75kW)	35	30734	-	31	27762	80.82
Bulk Supply	1	0	-	0	0	0.00
Extra State Consumer	-	-	1	1	5000	26.51
Total	9849322	16626851	19878.41	9404709	16056826	24448.30

3.2. Distribution Loss

- 3.2.1. UP State-owned Distribution Licensee are in process of formulation of Revamp Distribution Sector Scheme in the State. Accordingly, based on the actual distribution loss of the discom, MVVNL has estimated the Loss trajectories for the Coming years for the implementation of the scheme. The detailed approach has been discussed in the true-up section above.
- 3.2.2. Accordingly, considering the abovementioned fact and upcoming GoI Revamp Distribution Scheme the Petitioner requests the Hon'ble Commission to consider the Distribution loss trajectory as mentioned in the table below and reconsider its decision of setting an unachievable Distribution loss trajectory for the Petitioner.

TABLE 3-2 DISTRIBUTION LOSS CONSIDERED FOR FY 2023-24

Distribution Loss	FY 2023-24
MVVNL	15.23%

3.3. Energy Balance

- 3.3.1. The Energy Balance as approved by the Hon'ble Commission vis-à-vis normative Energy Balance for FY 2023-24 is shown in the Table below:

TABLE 3-3 ENERGY BALANCE FOR FY 2023-24

Particulars	Approved in T.O. dtd. 24.05.2023	Revised Estimated
Retail Sales	24333.50	24448.30
Distribution Losses	10.26%	15.23%
Energy at Discom Periphery for Retail Sales	27115.56	28841.53
Intra-State Transmission Losses	3.22%	3.22%
Energy Available at State periphery for Transmission	28017.73	29801.13
Energy Purchase from Stations connected to Intra-State Transmission network (UPPTCL)	20009.70	19256.45
Energy Purchase from Stations connected to Inter-State Transmission network (PGCIL)	8008.03	10544.68
Inter-State Transmission Loss	3.47%	6.95%
Net Energy Received from Stations connected to Inter-State Transmission network at UPPTCL Periphery (Ex-Bus)	8295.89	11332.49
Power Purchase Required &	28305.59	30588.94

Particulars	Approved in T.O. dtd. 24.05.2023	Revised Estimated
Billed Energy (MU) (Ex-Bus)		

3.4. Power Purchase Expense

- 3.4.1. UPPCL is procuring power on behalf of Discoms at consolidated level. Accordingly, the Power Purchase section represents the consolidated power purchase at UPPCL level. The consolidated energy balance (detailed Energy Balance with further break-up of inter-State energy has been submitted in Format F13L of MYT Formats) for FY 2023-24 is as follows: -

TABLE 3-4 CONSOLIDATED ENERGY BALANCE FOR FY 2023-24

Particulars	Approved in T.O. dated 24.05.2023	Revised Estimate
Retail Sales	114668.56	114609.11
Distribution Losses	10.30%	14.93%
Energy at Discom Periphery for Retail Sales	127835.71	134722.33
Intra-State Transmission Losses	3.22%	3.22%
Energy Available at State periphery for Transmission	132088.9712	139204.7225
Energy Purchase from Stations connected to Intra-State Transmission network (UPPTCL)	94293.22	89949.24
Energy Purchase from Stations connected to Inter-State Transmission network (PGCIL)	37795.75	49255.48
Inter-State Transmission Loss	3.47%	6.95%
Net Energy Received from Stations connected to Inter-State Transmission network at UPPTCL Periphery (Ex-Bus)	39154.67	52935.43
Power Purchase Required & Billed Energy (MU) (Ex-Bus)	1,33,447.89	1,42,884.67

3.4.2. The Power Purchase Cost for FY 2023-24 is estimated based on the audited data available for Power Purchase quantum and Cost for FY 2022-23 available till Sep'23. The audited power purchase cost details for FY 2023-24 is depicted as below: -

TABLE 3-5 GENERATING STATION WISE POWER PURCHASE COST FOR FY 2023-24

S. No	Source of Power (Station wise)	FY 2023-24										
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable Charge		Annual Other Cost		Late Payment Surcharge	Total Cost		Avg. Cost of Energy at Generator Bus
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)		(Rs. Cr.)	(Rs. / kWh)	
A	Long term Sources											
a	Power procured from own Generating Stations (if any)											
b	From State Generating Stations Thermal											
1	ANPARA-A	3,392.08	0.84	286.38	2.16	732.37	-	-	-	-	1,018.76	3.00
2	ANPARA-B	6,448.36	0.61	395.31	1.93	1,246.28	-	-	-	-	1,641.59	2.55
3	PANKI	-	-	-	-	-	-	-	-	-	-	-
4	PARICHHA	-	-	-	-	-	-	-	-	-	-	-
3	PARICHHA EXT.	2,114.84	1.80	380.34	3.51	743.00	-	-	-	-	1,123.34	5.31
4	OBRA-A	-	-	-	-	-	-	-	-	-	-	-
5	OBRA-B	4,083.91	1.13	463.36	2.58	1,053.72	-	-	-	-	1,517.08	3.71
6	HARDUAGANJ	351.29	2.93	102.89	3.29	115.49	-	-	-	-	218.38	6.22

S. No	Source of Power (Station wise)	FY 2023-24										
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable Charge		Annual Other Cost		Late Payment Surcharge	Total Cost		Avg. Cost of Energy at Generator Bus
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)		(Rs. Cr.)	(Rs. / kWh)	
7	HARDUAGANJ EXT.	1,074.48	5.42	582.18	3.91	420.38	-	-	-	-	1,002.57	9.33
8	PARICHHA EXT. STAGE-II	2,122.01	2.56	543.68	3.61	766.73	-	-	-	-	1,310.41	6.18
9	ANPARA-D	6,690.23	1.77	1,186.48	1.86	1,246.39	-	47.19	-	-	2,480.06	3.71
10	Panki Extension	-	-	-	-	-	-	-	-	-	-	-
11	HARDUAGANJ EXT. Stage II	1,818.49	4.44	807.27	-	693.50	-	-	-	-	1,500.77	8.25
12	OBRA-C	2,315.60	0.97	225.44	-	483.71	-	-	-	-	709.15	3.06
13	Jawaharpur	2,702.93	0.93	251.00	-	678.68	-	-	-	-	929.68	3.44
0	UPRVUNL Consolidated	-	-	-	-	-	-	-	-	-	-	-
	Sub-Total	33,114.21	-	5,224.34	-	8,180.25	-	47.19	-	-	13,451.78	4.06
c	From State Generating Stations Hydro											
1	RIHAND	447.30	0.54	24.20	0.47	20.95	-	-	-	-	45.15	1.01
2	OBRA (H)	235.05	0.46	10.71	0.42	9.83	-	-	-	-	20.54	0.87
3	MATATILA	69.98	0.39	2.72	0.46	3.24	-	-	-	-	5.96	0.85
4	KHARA	262.40	0.47	12.45	0.48	12.72	-	-	-	-	25.17	0.96
5	UGC	27.19	-	-	2.86	7.77	-	-	-	-	7.77	2.86
6	SHEETLA	2.44	-	-	1.56	0.38	-	-	-	-	0.38	1.56
7	BELKA	3.42	-	-	2.13	0.73	-	-	-	-	0.73	2.13
8	BABAIL	3.96	-	-	2.85	1.13	-	-	-	-	1.13	2.85
0	UPJVNL	-	-	0.57	-	-	-	-	-	-	0.57	-

S. No	Source of Power (Station wise)	FY 2023-24										
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable Charge		Annual Other Cost		Late Payment Surcharge	Total Cost		Avg. Cost of Energy at Generator Bus
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs / kWh)
	CONSOLIDATED											
	Sub-Total	1,051.74	-	50.65	-	56.74	-	-	-	-	107.39	1.02
d	From Central Sector Generating Stations											
a	Thermal (NTPC)											
1	ANTA GPS	3.08	51.43	11.59	3.57	-	0.22	-	-	55.21	-	
2	AURAIYA GPS	184.99	6.34	117.30	11.56	213.78	-	121.03	-	452.10	24.44	
3	DADRI GPS	272.51	3.70	100.80	10.99	299.60	-	13.55	-	413.96	15.19	
4	JHANOR GPS	0.00	-	0.01	11.24	0.00	-	0.00	-	0.01	-	
5	KAWAS GPS	0.00	0.01		0.00	-	0.00	-	-	0.01	-	
6	TANDA -TPS	756.18	4.90	370.17	5.25	397.34	-	0.00	-	767.52	10.15	
7	FGUTPS-I	463.31	3.90	180.47	4.78	221.46	-	10.56	-	412.49	8.90	
8	FGUTPS-II	374.16	2.68	100.16	3.88	145.03	-	0.02	-	245.21	6.55	
9	FGUTPS-III	122.91	4.51	55.38	4.65	57.11	-	6.09	-	118.58	9.65	
10	FGUTPS-IV	527.63	5.07	267.36	4.41	232.77	-	25.54	-	525.68	9.96	
11	FSTPS	81.54	2.30	18.74	3.53	28.82	-	3.58	-	51.13	6.27	
12	KHTPS-I	232.32	2.32	54.00	3.50	81.35	-	3.58	-	138.92	5.98	
13	KHTPS-II	1,050.36	1.69	177.02	3.33	349.56	-	0.12	-	526.69	5.01	
14	NCTPS-I	151.19	3.76	56.86	4.70	71.06	-	14.01	-	141.92	9.39	
15	NCTPS-II	157.94	6.57	103.78	4.49	70.93	-	12.18	-	186.89	11.83	
16	RIHAND-I	2,243.48	0.87	195.45	1.62	364.32	-	-2.83	-	556.94	2.48	
17	RIHAND-II	2,270.19	0.74	167.00	1.59	361.16	-	3.46	-	531.62	2.34	
18	RIHAND-III	2,435.53	1.38	336.37	1.57	382.23	-	6.80	-	725.41	2.98	

S. No	Source of Power (Station wise)	FY 2023-24										
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable Charge		Annual Other Cost		Late Payment Surcharge	Total Cost		Avg. Cost of Energy at Generator Bus
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs / kWh)
19	SINGRAULI	5,446.22	0.66	359.21	1.55	843.83	-	35.71	-	-	1,238.75	2.27
20	KORBA-I STPS	16.91	0.69	1.16	1.52	2.57	-	0.02	-	-	3.75	2.22
21	KORBA-III STPS	8.73	0.99	0.86	1.47	1.28	-	0.03	-	-	2.17	2.49
22	MAUDA-I STPS	2.44	13.69	3.35	3.27	0.80	-	0.01	-	-	4.16	17.01
23	MAUDA-II STPS	0.10		4.94		1.59	-	0.27	-	-	6.80	
24	SOLAPUR TPS	6.80	8.90	6.05	4.25	2.89	-	0.10	-	-	9.04	13.30
25	SIPAT-I STPS	28.76	1.20	3.46	1.88	5.41	-	0.00	-	-	8.87	3.08
26	SIPAT-II STPS	10.38	1.00	1.04	1.97	2.04	-	0.00	-	-	3.09	2.97
27	VINDHYANCHAL-I STPS	13.27	0.90	1.19	1.64	2.17	-	0.01	-	-	3.37	2.54
28	VINDHYANCHAL-II STPS	10.69	0.74	0.79	1.50	1.61	-	0.00	-	-	2.40	2.25
29	VINDHYANCHAL-III STPS	11.63	0.85	0.99	1.56	1.81	-	0.04	-	-	2.84	2.45
30	VINDHYANCHAL-IV STPS	15.05	1.52	2.29	1.55	2.33	-	0.16	-	-	4.78	3.17
31	VINDHYANCHAL-V STPS	7.78	1.54	1.20	1.60	1.24	-	0.19	-	-	2.63	3.39
32	TANDA -II-TPS	4,384.46	2.26	992.16	3.92	1,719.12	-	24.06	-	-	2,735.33	6.24
33	SINGRAULI STAGE III	-	-	-	-	-	-	-	-	-	-	-
34	GODARWARA STPS-I	6.19	9.48	5.87	3.60	2.23	-	-0.00	-	-	8.10	13.09
35	LARA STPS-I	24.84	1.54	3.84	2.14	5.31	-	0.04	-	-	9.18	3.70
36	KHARGONE STPS	3.64	14.51	5.28	3.79	1.38	-	0.43	-	-	7.09	19.49

S. No	Source of Power (Station wise)	FY 2023-24										
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable Charge		Annual Other Cost		Late Payment Surcharge	Total Cost		Avg. Cost of Energy at Generator Bus
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs / kWh)
	NTPC CONSOLIDATED	-	-	-	-	-	-	483.97	-	-	483.97	-
	Sub-Total	21,325.23	-	3,745.97	-	5,877.71	-	762.95	-	-	10,386.63	-
e	NPCIL											
1	KAPS	8.62	-	-	2.84	2.44	-	3.76	-	-	6.21	7.20
2	NAPP	1,061.53	-	-	3.01	319.79	-	0.48	-	-	320.27	3.02
3	TAPP-3 & 4	17.06	-	-	3.45	5.88	-	0.01	-	-	5.89	3.45
4	RAPP-3 & 4	451.60	-	-	3.47	156.74	-	0.99	-	-	157.73	3.49
5	RAPP-5 & 6	654.49	-	-	3.95	258.46	-	0.02	-	-	258.48	3.95
	Sub-Total	2,193.30	-	-	-	743.31	-	5.26	-	-	748.57	3.41
f	Hydro (NHPC)											
1	SALAL	237.57	0.98	23.28	0.97	22.94	-	40.96	-	-	87.18	3.67
2	TANAKPUR	89.99	3.08	27.76	2.16	19.45	-	56.11	-	-	103.31	11.48
3	CHAMERA-I	450.58	0.92	41.51	1.14	51.54	-	-5.59	-	-	87.46	1.94
4	URI	551.94	1.01	55.59	0.92	50.94	-	34.48	-	-	141.00	2.55
5	CHAMERA-II	293.57	1.26	36.87	1.01	29.66	-	9.52	-	-	76.05	2.59
6	DHAULIGANGA	242.86	1.62	39.46	1.27	30.92	-	17.71	-	-	88.08	3.63
7	DULHASTI	513.95	2.23	114.47	2.42	124.58	-	18.66	-	-	257.72	5.01
8	SEWA-II	131.88	3.03	39.91	2.68	35.39	-	6.03	-	-	81.32	6.17
9	CHAMERA-III	214.24	2.65	56.71	2.05	43.86	-	26.86	-	-	127.43	5.95
10	URI-II	347.54	2.21	76.79	2.20	76.34	-	18.46	-	-	171.59	4.94
11	PARBATI-III HEP	75.12	7.13	53.53	1.55	11.64	-	4.96	-	-	70.12	9.33
12	KISHANGANGA	598.78	2.34	140.30	2.01	120.25	-	11.17	-	-	271.72	4.54
13	PARBATI-II	-	-	-	-	-	-	-	-	-	-	-

S. No	Source of Power (Station wise)	FY 2023-24										
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable Charge		Annual Other Cost		Late Payment Surcharge	Total Cost		Avg. Cost of Energy at Generator Bus
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs / kWh)
14	SUBANSIRI LOWER	16.72	3.00	5.02	2.30	3.84	-	-	-	-	8.85	5.30
15	PAKALDUL	-	-	-	-	-	-	-	-	-	-	-
	NHPC Consolidated	-	-	-	-	-	-	-	-	-	-	-
	Sub-Total	3,764.75	-	711.18	-	621.35	-	239.31	-	-	1,571.84	4.18
g	HYDRO (NTPC)											
1	KOLDAM HPS	658.56	2.75	180.80	2.46	162.15	-	-	-	-	342.95	5.21
2	TAPOVAN VISHNUGARH	-	-	-	-	-	-	-	-	-	-	-
3	LATA TAPOVAN HEP	-	-	-	-	-	-	-	-	-	-	-
4	SINGRAULI SHPS	14.42	-	-	5.08	7.32	-	-	-	-	7.32	5.08
	Sub-Total	672.98	-	180.80	-	169.47	-	-	-	-	350.27	5.20
h	THDC											
	HYDRO											
1	TEHRI	1,230.14	1.84	226.91	2.07	255.18	-	2.77	-	-	484.86	3.94
2	KOTESHWAR	524.40	2.30	120.78	2.55	133.56	-	9.72	-	-	264.06	5.04
3	DHUKWAN	33.30	-	-	4.87	16.22	-	0.11	-	-	16.33	4.90
4	VISHNUGARH PIPAL KOTHI	-	-	-	-	-	-	-	-	-	-	-
	THDC Consolidated	-	-	-	-	-	-	-	-	-	-	-
	Thermal	-	-	-	-	-	-	-	-	-	-	-

S. No	Source of Power (Station wise)	FY 2023-24										
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable Charge		Annual Other Cost		Late Payment Surcharge	Total Cost		Avg. Cost of Energy at Generator Bus
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)		(Rs. Cr.)	(Rs. / kWh)	
1	KHURJA STPP	492.83	2.50	123.21	2.64	129.98	-	-	-	-	253.19	5.14
	Sub-Total	2,280.67	-	470.90	-	534.95	-	12.60	-	-	1,018.44	4.47
i	SJVN											
1	RAMPUR	263.19	2.85	75.05	2.09	54.97	-	10.11	-	-	140.13	5.32
2	NATHPA JHAKRI	1,074.18	1.31	140.49	1.32	141.55	-	13.06	-	-	295.10	2.75
	Sub-Total	1,337.38	-	215.53	-	196.53	-	23.17	-	-	435.23	3.25
j	NEEPCO											
1	Kameng HEP	252.62	-	-	3.80	96.04	-	5.94	-	-	101.97	4.04
k	IPP/JV	-	-	-	-	-	-	-	-	-	-	-
	HYDRO											
1	TALA	74.22	-	-	2.28	16.95	-	-	-	-	16.95	2.28
2	VISHNU PRAYAG	1,510.48	0.16	24.72	1.06	159.80	-	9.95	-	-	194.48	1.29
3	KARCHAM	763.35	1.72	131.33	1.36	103.92	-	21.96	-	-	257.21	3.37
4	TEESTA-III	887.05	3.24	287.39	2.87	254.23	-	-23.26	-	-	518.36	5.84
5	SRI NAGAR HEP	1,215.56	5.94	721.51	4.27	519.07	-	0.03	-	-	1,240.61	10.21
6	Rajghat Hydro	-	-	-	-	-	-	-	-	-	-	-
7	Hydro (Competitive Bidding)	490.87	-	54.40	-	66.69	-	1.69	-	-	122.78	2.50
	Thermal											
1	Meja Thermal Power Plant	6,556.19	2.19	1,432.96	3.22	2,109.84	-	13.97	-	-	3,556.78	5.43
2	LANCO	7,320.89	0.78	569.64	2.66	1,947.98	-	57.51	-	-	2,575.14	3.52
3	APCPL	33.64	5.86	19.72	4.47	15.04	-	1.78	-	-	36.54	10.86
4	BEPL BARKHERA	178.14	6.96	123.96	4.55	81.13	-	-8.29	-	-	196.80	11.05

S. No	Source of Power (Station wise)	FY 2023-24										
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable Charge		Annual Other Cost		Late Payment Surcharge	Total Cost		Avg. Cost of Energy at Generator Bus
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)		(Rs. Cr.)	(Rs. / kWh)	
5	BEPL KHAMBHAKHERA	187.80	6.85	128.73	4.66	87.55	-	-18.49	-	-	197.79	10.53
6	BEPL KUNDRAKHI	185.34	6.74	124.89	4.57	84.66	-	-25.66	-	-	183.90	9.92
7	BEPL MAQSOODAPUR	193.59	6.61	128.03	4.64	89.77	-	-15.04	-	-	202.76	10.47
8	BEPL UTRAULA	180.78	7.26	131.23	4.65	84.03	-	-15.51	-	-	199.74	11.05
9	KSK MAHANADI	4,636.36	3.17	1,471.80	3.79	1,755.12	-	61.93	-	-	3,288.84	7.09
10	LALITPUR	8,736.42	3.60	3,148.35	3.35	2,927.88	-	-	-	-	6,076.23	6.96
11	M.B.POWER (PTC)	2,746.38	2.24	616.25	1.93	528.79	-	66.09	-	-	1,211.13	4.41
12	PRAYAGRAJ POWER	10,496.17	1.34	1,405.11	2.28	2,395.62	-	0.18	-	-	3,800.92	3.62
13	R.K.M.POWER	2,539.00	2.36	598.37	2.15	545.91	-	-0.19	-	-	1,144.09	4.51
14	ROSA-1&2	5,591.41	2.20	1,229.73	3.27	1,825.84	-	-95.71	-	-	2,959.85	5.29
15	SASAN	3,582.90	0.15	55.10	1.18	423.13	-	4.64	-	-	482.88	1.35
16	TRN ENERGY (PTC)	2,399.18	1.57	376.22	1.84	442.53	-	1.17	-	-	819.92	3.42
17	NABINAGAR POWER PROJECT	1,335.67	1.66	221.72	2.65	353.81	-	0.74	-	-	576.27	4.31
18	Ghatampur	2,319.06	2.51	581.35	2.64	611.65	-	-	-	-	1,193.01	5.14
	Sub-Total	64,160.45	-	13,582.54	-	17,430.95	-	39.49	-	-	31,052.98	4.84
	Total	1,30,153.32	1.86	24,181.91	2.61	33,907.29	-	1,135.91	-	-	59,225.11	4.55
B	Medium term Sources	-	-	-	-	-	-	-	-	-	-	-
C	Short term											

S. No	Source of Power (Station wise)	FY 2023-24										
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable Charge		Annual Other Cost		Late Payment Surcharge	Total Cost		Avg. Cost of Energy at Generator Bus
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs / kWh)
	Sources											
	Other Sources Sub-total											
D	Cogen/ Captive	-	-	-	-	-	-	-	-	-	-	-
	Baggasse/Cogen/ CPP 1	2,662.43	1.27	337.74	3.38	899.28	-	6.08	-	-	1,243.11	4.67
	Baggasse/Cogen/ CPP 2	-	-	-	-	-	-	-	-	-	-	-
	Sub-Total Cogen/ Captive	2,662.43	1.27	337.74	3.38	899.28	-	6.08	-	-	1,243.11	4.67
E	Bilateral & Others (Power purchased through Trading)	-586.98	1.19	-69.91	-14.68	861.89	-	0.88	-	-	792.86	-13.51
1	Solar (Existing)	6,142.17	-	-	3.56	2,186.73	-	49.18	-	-	2,235.91	3.64
2	Sub-Total Solar	6,142.17	-	-	3.56	2,186.73	-	49.18	-	-	2,235.91	3.64
3	Solar (FY 22)	-	-	-	-	-	-	-	-	-	-	-
4	Solar (FY 23)	-	-	-	-	-	-	-	-	-	-	-
5	Solar (FY 24)	225.30	-	-	3.00	67.59	-	-	-	-	67.59	3.00
6	Solar (FY 25)	-	-	-	-	-	-	-	-	-	-	-
	Sub-Total Solar	6,367.46	-	-	-	2,254.32	-	49.18	-	-	2,303.50	3.62
G	Non-Solar (Renewable)											
1	WIND (Existing)	-	-	-	-	-	-	-	-	-	-	-
2	WIND	3,408.87	-	-	3.09	1,051.67	-	-	-	-	1,051.67	3.09

S. No	Source of Power (Station wise)	FY 2023-24										
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable Charge		Annual Other Cost		Late Payment Surcharge	Total Cost		Avg. Cost of Energy at Generator Bus
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs / kWh)
3	WIND (FY 24)	563.25	-	-	2.98	167.77	-	-	-	-	167.77	2.98
4	WIND (FY 25)	-	-	-	-	-	-	-	-	-	-	-
6	Biomass Existing	73.57	-	-	6.17	45.38	-	-	-	-	45.38	6.17
7	Biomass FY 20	-	-	-	-	-	-	-	-	-	-	-
8	MSW Existing	6.59	-	-	7.48	4.93	-	-	-	-	4.93	7.48
	Sub-total RE other than solar	4,052.27	-	-	-	1,269.76	-	-	-	-	1,269.76	3.13
	Other	-	-	-	-	-	-	-	-	-	-	-
1	Slop Based Power Project	62.22	-	-	1.44	8.99	-	-	-	-	8.99	1.44
		-	-	-	-	-	-	-	-	-	-	-
H	NVVN + NSM (Thermal)	471.83	-	-	3.67	173.21	-	12.45	-	-	185.66	3.93
	NVVN + NSM (Solar))	146.61	-	-	7.20	105.53	-	3.33	-	-	108.86	7.42
	Reactive Energy Charges	-	-	-	-	-	-	-	-	-	-	-
I	Short Term Sources	-	-	-	-	-	-	-	-	-	-	-
J	REC	-	-	-	-	-	-	-	-	-	-	-
K	Banking	-	-	-	-	-	-	3.63	-	-	3.63	-
L	Transmission Charges	-	-	-	-	-	-	6,668.66	-	-	6,668.66	-
	RRAS	-	-	-	-	-	-	-7.56	-	-	-7.56	-
	Any Other Charges	-444.49	-	-	4.78	-212.38	-	-	-	-	-212.38	4.78

S. No	Source of Power (Station wise)	FY 2023-24										
		Units (MU)	Annual Fixed Charges		Annual Energy/ Variable Charge		Annual Other Cost		Late Payment Surcharge	Total Cost		Avg. Cost of Energy at Generator Bus
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)		(Rs. Cr.)	(Rs. / kWh)	
	Less	-	-	-	-	-	-	-	-	-	-	-
	Late Payment Surcharge	-	-	-	-	-	-	-	-	-	-	-
	Grand Total	1,42,884.67	-	24,449.74	-	39,267.88	-	7,872.55	-	-	71,590.18	5.01

Differential Bulk Supply Tariff (DBST)

3.4.3. As the revised estimates of distribution loss for the Petitioner is different from the distribution loss level approved by the Hon'ble Commission, The Differential Bulk Supply Tariff (DBST) for FY 2023-24 had been computed as under and thereafter, the Petitioner had worked out the power purchase cost for FY 2023-24 on the same.

3.4.4. Computation of DBST as per the Commission approved methodology is shown in the Table below:

TABLE 3-6 COMPUTATION OF DBST FOR FY 2023-24

S.No	Particulars	Formulae	DVVNL	PVVNL	PuVVNL	MVVNL	KESCO	Total
1	Revenue from Tariff including subsidy (Rs Cr)	A	16,847.06	25,611.94	19,948.42	18,660.65	2,986.41	84,054.47
2	Energy Sales (MU)	B	23,593.21	35,370.62	27,220.41	24,448.30	3,976.56	1,14,609.11
3								
A1	Power Procurement Cost – Allocated and Unallocated PPAs (Rs Cr)							66034.82
A2	Inter State Transmission Charges (Rs Cr)							5555.48
A1+A2	Total Power Procurement Cost excluding intra state Transmission Charges (In Rs Cr)	C						71590.31
4	Power Procurement cost of Allocated PPAs (Rs Cr)	D	2651.79	5016.76	2793.55	2793.55	190.05	13445.70
5	Total Power Required at Discom Periphery (MU)	E	28459.84	40864.80	32235.92	28841.53	4320.23	134722.33
6	Power at Discom Periphery from allocated PPAs (MU)	F	6411.97	12909.22	6572.46	6572.46	505.79	32971.90
7	Other Cost (Intra State Transmission, O&M, Interest, Dep etc.) (Rs. Cr.)	G	4433.27	4583.57	4779.27	4560.83	658.77	19015.70
8	ABR (Rs/ Unit)	$H=(A/B)*10$	7.14	7.24	7.33	7.63	7.51	7.33
9	Other Cost (Rs/Unit of Sale)	$I=G*10/B$	1.88	1.30	1.76	1.87	1.66	1.66
10	Power Purchase Rate		0.00	0.00	0.00	0.00	0.00	0.00
A	Allocated PPAs per unit of sale (Rs/unit)	$J=D*10/B$	1.12	1.42	1.03	1.14	0.48	1.17

S.No	Particulars	Formulae	DVVNL	PVVNL	PuVVNL	MVVNL	KESCO	Total	
B	Unallocated PPAs per unit of sale	$K=(C-\text{Total PP at "D"})*10/\text{Total Sale at "B"}$	5.07						
11	Revenue available for unallocated PPAs (Rs./unit of sale)	$L=H-I-J$	4.14	4.53	4.55	4.62	5.38	4.50	
12	Power Purchase Allocation (per unit of sale) "K" in the ratio of available Revenue "L"	M	4.66	5.10	5.12	5.21	6.06	5.07	
13	Total Power Purchase cost per unit of sale including allocated PPAs	$N=J+M$	5.79	6.52	6.15	6.35	6.54	6.25	
14	Total Power Purchase Cost (Rs Crs)	$O=N*B/10$	13,653.42	23,061.60	16,740.66	15,535.54	2,599.08	71,590.31	
	DBST (Rs/Unit)								
15	DBST Computation of Allocated PPAs	P	4.14	3.89	4.25	4.25	3.76	4.08	
16	DBST Computation of Unallocated PPAs	$Q=M*B/(E-F)$	4.99	6.45	5.43	5.72	6.32	5.71	
17	DBST of total PPAs	$R=O*10/E$	4.80	5.64	5.19	5.39	6.02	5.31	

- 3.4.5. The Petitioner has worked out the power purchase cost for FY 2023-24 based on the above Differential Bulk Supply Tariff (DBST). The allowable power purchase cost for FY 2023-24 is shown in the table below:

TABLE 3-7 POWER PURCHASE COST FOR FY 2023-24

Particulars	Approved in T.O. dtd. 24.05.2023	Revised Estimates
Allowable Power Purchase (MU)	27115.56	28841.53
DBST (Rs./kWh)	5.43	5.39
Power Procurement Cost (IN RS. CR)	14735.36	15535.54

**DBST rate considered as mentioned in table above.*

3.5. Intra-State Transmission Charges

- 3.5.1. The intra-State Transmission charges (including SLDC charges) computed based on approved transmission rate is shown in the Table below:

TABLE 3-8 INTRA-STATE TRANSMISSION CHARGES FOR FY 2023-24

Particulars	Unit	Approved in T.O. dtd. 24.05.2023	Claimed
Units Wheeled	MU	27115.56	28841.53
Transmission Rate as approved by UPERC for UPPTCL for FY 2022-23 in T.O. dated 20.07.2022	Rs/kWh	0.2641	0.2641
Transmission Charges	Rs Crore	716.12	761.70

- 3.5.2. It is submitted that the variation in intra state Transmission charges are on account of variation in the Units wheeled.

3.6. Operation and Maintenance Expenses

- 3.6.1. Operation and Maintenance Expenses (O&M expenses) comprises of employee expenses, repair and maintenance expenses and administrative and general expenses. The detailed approach has been discussed in the true-up section above.

Employee Expenses

- 3.6.2. The base year is computed on the trued-up for FY 2019-20. Further, the Petitioner has considered the same methodology approved by the Hon'ble Commission in the Tariff Order for FY 2023-24, for the APR of Employee expenses for FY 2023-24 as shown below.

TABLE 3-9 COMPUTED EMPLOYEE EXPENSES FOR FY 2023-24

Particulars	Claimed in Instant Petition for FY 2022-23	Average CPI Escalation of last 3 years.	Computed (Rs. Cr)
Employee Expenses	898.90	5.40%	947.45

3.6.3. Further, the capitalisation has been projected based on same ratio of employee expenses capitalisation and employee expenses for FY 2022-23 (True-up year). Accordingly, Employee Expenses and its Capitalisation determined for FY 2023-24 is shown in table below.

TABLE 3-10 EMPLOYEE EXPENSES FOR FY 2023-24

Sl No.	Particular	Approved in T.O. 24.05.2023	Normative
A	Gross Employee Expenses after escalation	869.57	947.45
B	Less: Employee Expenses capitalized	450.88	188.93
C	Net Employee Expenses	418.69	758.52

Repairs & Maintenance Expenses (R&M)

3.6.4. The base year is computed on the trued-up for FY 2019-20. Further, the Petitioner has considered the same methodology approved by the Hon'ble Commission in the Tariff Order for FY 2023-24, for the APR of R&M expenses for FY 2023-24 as shown below.

TABLE 3-11 R&M EXPENSES FOR FY 2023-24

Particulars	Claimed in Instant Petition for FY 2022-23	Average WPI Escalation of last 3 years.	Computed (Rs. Cr)
R&M Expenses	407.99	7.87%	440.10

3.6.5. Net normative R&M expenses details for FY 2023-24 is shown in the Table below:

TABLE 3-12 NORMATIVE R&M EXPENSES FOR FY 2023-24

Sl No.	Particulars	Approved in T.O. 24.05.2023	Normative
1	Gross R&M Expenses after escalation	453.24	440.10
2	Less: R&M Expenses capitalized	-	-
3	Net R&M Expenses	453.24	440.10

Administrative and General Expense (A&G)

- 3.6.6. The base year is computed on the trued-up for FY 2019-20. Further, the Petitioner has considered the same methodology approved by the Hon'ble Commission in the Tariff Order for FY 2023-24, for the APR of A&G expenses for FY 2023-24 as shown below.

TABLE 3-13 COMPUTED A&G EXPENSES FOR FY 2023-24

Particulars	Claimed in Instant Petition for FY 2022-23	Average WPI Escalation of last 3 years.	Computed (Rs. Cr)
A&G Expenses	945.16	7.87%	1,019.57

- 3.6.7. Normative Administrative and General expenses details for FY 2023-23 has been shown in the Table below:

TABLE 3-14 NORMATIVE A&G EXPENSES FOR FY 2023-24

Sl No.	Particulars	Approved in T.O. 24.05.2023	Normative
1	Gross A&G Expenses after escalation	325.43	1,019.57
2	Less: A&G expenses capitalized	-	-
3	Net A&G expenses	325.43	1,019.57

Smart Metering OPEX

- 3.6.8. The amount sought as 'Additional A&G Expenses for smart metering is payable to EESL to cover cost towards smart meter and box installation, AMI software cost, consumer indexing, training, integration and Commissioning of AMI solution. It may be noted that this cost has been proposed to be recovered under Opex model based on per meter per month basis and there shall be no additional burden of depreciation, interest and return on equity on the consumer.

- 3.6.9. The Hon'ble Commission in Tariff Order FY 2022-23 dt. 20.07.2022 at Clause no. 5.9.24 has stated *that*,

"However, the Smart Meter Rollout scheme is OPEX model and not CAPEX model. With roll out of Smart Meters, the billing and collection efficiency of Discoms will increase thereby reducing the commercial losses. It is expected that the overall O&M cost of the Discoms would also decrease due to improved billing & collection efficiency which would be compensated by the charges paid in OPEX model. Hence the same cannot be allowed as additional O&M expense."

- 3.6.10. The smart meter roll-out plan on Opex model was submitted to the Hon'ble Commission well before its implementation. The Hon'ble

Commission while approving the roll-out plan never stated that the cost envisaged under the Opex model would not be allowed to be passed on in the ARR. Moreover, the Hon'ble Commission in its Tariff Order dated 03.09.2019 stated that it will carry out detailed analysis of the additional O&M expenses (on account of implementation of smart meter roll out plan) for ensuing years at the time of truing-up.

- 3.6.11. Therefore, the Hon'ble Commission is requested to allow the smart meter Opex estimated by the Petitioner for FY 2023-24:

TABLE 3-15 SMART METERING OPEX FOR FY 2023-24

Particulars	Smart Meters installed till March 2023	Smart Meters to be installed till March 2024	Rate (Rs. /meter/month including GST @18%)	OPEX (IN RS. CR)
FY 2023-24	198726	349353	107.09	28.89

- 3.6.12. The Hon'ble Commission is requested to approve the same.
- 3.6.13. Further, it is also important to mention here that Smart metering OPEX was not covered under the A&G Expense head in the past and therefore, shall be allowed in full, over and above the usual A&G Expenses proposed by the Petitioner.
- 3.6.14. Based on the above submission, the summary of the Operation & Maintenance expenses (O&M) approved in the Tariff Order for FY 2023-24 vis-a-vis the O&M expenses claimed are shown in the table below:

TABLE 3-16 OPERATION & MAINTENANCE EXPENSES FOR FY 2023-24 (IN RS. CR)

Particulars	Approved in T.O. dtd. 24.05.2023	Revised Estimate
Repair & Maintenance expenses	453.24	440.10
Employee expenses	869.57	947.45
Administrative and General expenses	325.43	1019.57
Gross O&M Expenses	1648.24	2407.12
Less:	0.00	-
Employee expenses capitalized	450.88	188.93
Administrative and General expenses capitalized	-	-
Gross expenses Capitalized	450.88	188.93
Smart Meter Opex	-	28.89
Net O&M Expenses	1197.36	2247.07

- 3.6.15. The Petitioner requests the Hon'ble Commission to allow O&M expenses as shown in the above Table.

3.7. Capital Investment, Capitalisation and Financing

- 3.7.1. The Petitioners submits that the Central Government has approved the RDSS, a Reforms-based and Results-linked Scheme with a five-year budget of Rs. 3,03,758 Crore, to improve the quality, reliability, and affordability of power supply to consumers through a financially sustainable and operationally efficient distribution sector. The key objective of the scheme is to reduce AT& C losses to 12-15 percent across India, and the ACS-ARR gap to zero, by increasing operational efficiencies and financial sustainability of all DISCOMs/Power Departments, excluding private sector DISCOMs.
- 3.7.2. The Scheme is specifically for modernization and loss reduction using proper utilization of funds for works on Pre-Paid Smart Metering, System Metering, and Distribution Infrastructure. Many Steps have also been taken for automation and use of Information Technology (IT) in the Distribution Sector under IPDS and R-APDRP which includes the establishment of Data Centres, GIS mapping of consumers, Asset Mapping, Online energy auditing & accounting, Consumer care centers, AMI meters on feeders & Distribution Transformers, provision of Smart Metering to reduce losses etc. in urban areas
- 3.7.3. The Revamped Reforms-based and Results-linked, Distribution Sector Scheme seeks to improve the operational efficiencies and financial sustainability, by providing financial assistance to Discoms for strengthening of supply infrastructure based on meeting pre-qualifying criteria and achieving basic minimum benchmarks in reforms.
- 3.7.4. Funding Structure of the Project a Grant of 60% of the approved cost of Distribution infrastructure works and remaining 40% bear by the State Government/Discom. As regards implementation of scheme in MVVNL, Sanctioned Amount in the Project for Loss Reduction and Smart metering works is **Rs. 5009.35** crore and **Rs. 4364.66** crore Respectively. Details of Total Project cost of the scheme is shown in table below:

TABLE 3-17 RDSS PROJECT COST DETAILS OF MVVNL (IN RS. CR)

S. No.	Particulars	Total project cost	Remarks
1	Smart Metering Works	5009.35	Tender will be executed in TOTEX mode.
2	Infrastructure Works- Loss Reduction	4165.32	Tender will be executed in CAPEX mode.
3	Infrastructure Works- Modernization	4364.66	Tender will be executed in CAPEX mode.

	Total	13539.33
--	--------------	-----------------

- 3.7.5. The Hon'ble UPERC in its Tariff order for FY 2023-24 dated 24.05.2023 has also directed Discoms to submit separate petition for approval of capital investment plant as per Regulation 44 of 2019. The relevant section of the tariff order for FY 2022-23 is as under:

“6.8.13. The Commission vide letter dated April 01, 2022 directed the Petitioners to submit the capital expenditure of each project and take prior approval for projects with cost above Rs. 10 Crore. Petitioners should submit the CAPEX accordingly and provide all submissions / information / documents for approval of the projects in line with Regulation 44 MYT Regulations, 2019. In response to the Commission’s query, the Petitioners have made submission only in regard to Revamped Distribution Sector Scheme (RDSS) as per which Ministry of Power has approved the capex plan.

*6.8.14. The Commission finds that the Petitioners have neither sought the approval nor have they apprised the Commission on such Capital Investment Plan. Any scheme launched by the Government has to be approved by the Commission. Accordingly, the Capital Investment under the RDSS scheme has been disallowed. **The Commission directs the Petitioners to seek approval of the Capital Investment under this scheme and appropriate treatment shall be done at the time of True-Up. Similarly, the Petitioners are directed also to seek approval for any other scheme / projects as well in which the cost incurred is more than threshold limit of Rs. 10 Crore as provided in Regulation 44 of MYT Regulations, 2019.**”*

- 3.7.6. In the backdrop of the above facts and circumstances MVVNL has filed a separate petition for its proposed Investment Plan Petition for the RDSS Scheme. The petitioner submits that the proposed amount of **Rs. 13539.33** crores is to be invested in RDSS. The capital expenditure is expected to further strengthen the distribution network of the petitioner and will help in extending quality and reliable power supply in its license area.
- 3.7.7. Revised details of the capex schemes (submitted in the MYT Formats) are shown in the Table below.

TABLE 3-18 CAPEX FOR FY 2023-24 (IN RS. CR)

Schemes	Investment	Capitalisation
OTHER SCHEMES	1,555.38	1,217.46
IPDS	60.04	24.02
REVAMPED SCHEME (RDSS)	1,299.64	519.86
Total Investments (A)	2,915.06	1,761.33
Add: Employee Capitalization (B)	-	188.93
Add: Interest Capitalization (C)		
Total (D= A+B+C)	2,915.06	1,950.27
Asset not belonging to Discom (E)	-	-
Total (F= D-E)	2,915.06	1,950.27

- 3.7.8. It is pertinent to highlight that the Investment considered for FY 2023-24 is the net investments (excluding grants and consumer contributions). This investment is funded only by debt and equity portion. The Petitioner has separately provided the amount of consumer contribution and grant for FY 2023-24 in relevant section of this petition and in tariff formats as well.
- 3.7.9. Based on the methodology adopted by the Hon'ble Commission, 40% of the investments made during FY 2023-24 is capitalized in the same year. The Petitioner has also considered employee expense capitalization and Interest capitalization during FY 2023-24 as per the methodology adopted by the Hon'ble Commission. Considering the Capital Work in Progress (CWIP), investment during the year and capitalisations, the Petitioner has computed the closing CWIP for FY 2023-24. The details are provided in the table below:

TABLE 3-19 CAPITAL INVESTMENT IN FY 2023-24 (IN RS. CR)

Particulars	Derivation	Approved in T.O. dtd. 24.05.2023	Revised Estimates
Opening WIP as on 1st April	A	1,832.87	1,488.27
Investments	B	1,291.28	2,726.13
Employee Expenses capitalization	C	450.88	188.93
A&G Expenses Capitalisation	D	-	-
Interest Capitalisation on Interest on long term loans	E	-	-
Total Investments	F= A+B+C+D+E	3,575.03	4,403.33
Transferred to GFA (Total Capitalisation)	G	1,304.19	1,950.27
Closing WIP	H=F-G	2,270.84	2,453.07

- 3.7.10. The Table below summarises the amounts received towards consumer contributions, capital grants and subsidies in FY 2023-24:

TABLE 3-20 CONSUMER CONTRIBUTIONS, CAPITAL GRANTS AND SUBSIDIES IN FY 2023-24 (IN RS. CR)

Particulars	Approved in T.O. dtd. 24.05.2023	Revised Estimates
Opening Balance of Consumer Contributions, Grants and Subsidies towards Cost of Capital Assets	5,738.28	2,302.92
Additions during the year includes consumer contribution and grants	-	-
Closing Balance	5,738.28	2,302.92

3.7.11. As discussed in above tables, the capital investment eligible for financing after deducting consumer contribution and grant is shown in the table below. The Petitioner has considered the same approach as in previous Orders and therefore, considered the funding of capitalisation (Asset put to use) in the ratio of 70:30. Considering this approach, 70% of the Capitalisation (Asset put to use) undertaken during the year has been financed through loan and balance 30% has been financed through equity contributions.

TABLE 3-21 FINANCING OF THE CAPITAL INVESTMENTS IN FY 2023-24 (IN RS. CR)

Particulars	Derivation	Revised Estimates
Capitalisation (Asset put to use) net of CCG	A	1,950.27
Less:		-
Consumer Contribution and Grants	B	-
Investment funded by debt and equity	C=A-B	1,950.27
Debt Funded	70% of C	1,365.19
Equity Funded	30% of C	585.08

3.8. Interest & Finance Charges

Interest on Long Term Loan

3.8.1. The Hon'ble Commission in its previous Tariff and True-Up orders had considered a normative tariff approach with a debt equity ratio of 70:30. Considering this approach, 70% of the capitalisation undertaken in any year was financed through loan and balance 30% has been financed through equity contributions. The portion of capital expenditure financed through consumer contributions, capital subsidies and grants are separated and the depreciation, interest and return on equity thereon was not charged to the consumers. Subsequently, the financing of the capital investment was worked out based on the debt equity ratio of 70:30 and net allowable depreciation was considered as normative loan repayment.

- 3.8.2. The Petitioner has worked-out the interest on long term loan based on the same philosophy.
- 3.8.3. The opening balance of long term loan has been considered equivalent to the closing loan balance for FY 2022-23 as per the present Petition.
- 3.8.4. Net Allowable depreciation for the year has been considered as normative loan repayment. The actual weighted average rate for FY 2022-23 (details are submitted in Format F31 of the MYT Tariff Formats) has been considered for computing the eligible interest expenses.
- 3.8.5. Considering the above, the interest on long term loan has been computed below. The computations for interest on long term loan are shown in table below:

TABLE 3-22 ALLOWABLE INTEREST ON LONG TERM LOAN FOR FY 2023-24 (IN RS. CR)

Particulars	Approved in T.O. dtd. 24.05.2023	Revised Estimates
Opening Loan	4,039.44	3,724.40
Loan Additions (70% of Capitalisation)	912.93	1,365.19
Less: Repayments (Depreciation allowable for the year)	510.30	528.73
Closing Loan Balance	4,442.08	4,560.86
Weighted Average Rate of Interest	10.91%	10.91%
Interest on long term loan	462.67	451.96
Less: Interest Capitalized	-	-
Net Interest on Loan term loan	462.67	451.96

Interest on Consumer Security Deposits

- 3.8.6. The Petitioner has considered the consumer security deposit for FY 2022-23 as opening amount of consumer security deposit for FY 2023-24. To arrive at the closing amount of security deposit for FY 2023-24 the ratio of revenue assessment for current year (FY 2023-24) and previous year (FY 2022-23) is multiplied with consumer security deposit as per the books of accounts for FY 2022-23.
- 3.8.7. The interest on consumer security deposit is calculated on average amount of consumer security deposit and at the rate of RBI as on 1st April 2023.
- 3.8.8. The Petitioner requests the Hon'ble Commission to consider the Interest on Security Deposit for APR of FY 2023-24, which has been computed at RBI interest rate of 6.50 % as on 1st April 2023. The normative interest on consumer security deposit approved by the Hon'ble Commission in Tariff Order for FY 2023-24 vis-a-vis the estimated consumer security deposit is shown in table below:

TABLE 3-23 INTEREST ON SECURITY DEPOSIT FOR FY 2023-24 (IN RS. CR)

Particulars	Approved in T.O. dtd. 24.05.2023	Revised estimates
Closing Balance for Security Deposit	806.83	854.53
Interest on Security Deposits	29.05	53.46
Rate of Interest (RBI bank Rate as on 01.04.2022)	3.60%	6.50%

Bank and Finance Charges

3.8.9. The Petitioner humbly submits that the banks and finance charges are legitimate charges and therefore for the estimation purpose the petitioner has considered the same value for FY 2023-24 as recorded in the account FY 2022-23. It has been considered as below:

TABLE 3-24 BANK AND FINANCE CHARGES FOR FY 2023-24 (IN RS. CR)

Particulars	Revised estimates
Bank and Finance Charges	34.49

3.9. Interest on Working Capital

3.9.1. The Petitioner worked-out interest on working capital for FY 2023-24 as per Regulation 25 of the Multi Year Tariff Distribution Regulations, 2019. The Regulation 25 is quoted below:

“(a) The working capital requirement of the Distribution Business shall cover:
(i) Operation and maintenance expenses for one month;
(ii) Maintenance spares at 40% of the R&M expenses for two months; and
(iii) One and half month equivalent of the expected revenue from charges Distribution system at the prevailing Tariff (excluding Electricity Duty);
Minus
(iv) Amount held as security deposits from Distribution System Users:

Provided that for the purpose of Truing-Up for any year, the working capital requirement shall be re-computed on the basis of the values of components of working capital approved by the Commission in the Truing- Up;
(b) Rate of interest on working capital shall be simple interest and shall be equal to the SB!
MCLR (1 Year) on October 01, 2019 plus 250 basis points:

Provided that for the purpose of Truing-Up for any year, simple interest on working capital shall be allowed at a rate equal to the weighted average SBI MCLR (1 Year) prevailing during the concerned. Year plus 250 basis points.”

3.9.2. The detailed working of Interest on Working Capital for FY 2023-24 is shown in table below:

TABLE 3-25 INTEREST ON WORKING CAPITAL FOR FY 2023-24 (IN RS. CR)

Particulars	Approved in T.O. dtd. 24.05.2023	Revised Estimates
O&M expenses for 1 month	99.78	184.85
One and Half month equivalent of expected revenue	2,285.06	2,332.58
Maintenance spares @ 40% of R&M expenses for two months	30.22	29.34
Less: Security deposits from consumers, if any	806.83	854.53
Total Working Capital Requirement	1,608.23	1,692.24
State Bank Advance Rate (SBAR) % as on 1 st Oct 2019 Plus 250 bp	10.20%	11.05%
Interest on Working Capital	164.04	186.99

3.9.3. The following table summarises the Interest and Finance charges claimed by the Petitioner as against those approved by the Hon'ble Commission in the Tariff Order for FY 2023-24.

TABLE 3-26 INTEREST AND FINANCE CHARGES FOR FY 2023-24 (IN RS. CR)

Particulars	Approved in T.O. dtd. 24.05.2023	Revised Estimates
Interest on Long Term Loans		
Gross Interest on Long Term Loan	462.67	451.96
Less: Interest Capitalisation	-	-
A: Net Interest on Long Term Loans	462.67	451.96
Finance and Other Charges		
Interest on Consumer Security Deposits	29.05	53.46
Bank/ Finance Charges	-	34.49
B: Total Finance Charges	29.05	87.95
	-	-
C: Interest on Working Capital	164.04	186.99
	-	-
Total (A+B+C)	655.76	726.90

3.10. Depreciation

3.10.1. The Petitioner has computed the allowable depreciation expense on the GFA base for FY 2022-23 and at the rates approved by the Hon'ble Commission in MYT Distribution Regulations, 2019. The Petitioner has computed the depreciation only on the depreciable asset base and has excluded the non-depreciable assets such as land, land rights, etc. The depreciation has been calculated in two parts (Part A & B) for the asset blocks depreciated before 01.04.2020 and asset blocks depreciated as on 01.02.2020 as per the SLM methodology prescribed in MYT Regulations, 2019. The addition to GFA is considered in Part B and the same is considered net of Consumer contribution and grants. Considering this philosophy, the gross entitlement towards depreciation has been computed as shown in the Tables below:

TABLE 3-27 GROSS ALLOWABLE DEPRECIATION FOR FY 2023-24 (IN RS. CR) PART A

GROSS ALLOWABLE DEPRECIATION FOR ASSETS BEFORE 01.04.2020 OF MVNVL FOR FY 2023-24 (IN RS. CR) PART A								
S.No.	Particulars	Opening GFA (as on 31.03.2023)	Cumulative Depreciation	Deduction to GFA	Closing GFA	Average GFA	Depreciation Rate	Allowable Gross Depreciation
1	Land & Land Rights	1.07	-	-	1.07	1.07	-	-
2	Buildings	182.32	-	-	182.32	182.32	0.03	6.09
3	Other Civil Works	14.27	-	-	14.27	14.27	0.03	0.48
4	Plant & Machinery	-554.13	-	-	-554.13	-554.13	0.05	-29.26
5	Lines, Cables, Network etc.	3,875.25	-	-	3,875.25	3,875.25	0.05	204.61
6	Vehicles	5.55	-	-	5.55	5.55	0.06	0.35
7	Furniture & Fixtures	9.59	-	-	9.59	9.59	0.06	0.61
8	Office Equipments	76.48	-	-	76.48	76.48	0.06	4.84
9	Capital Expenditure on Assets not belonging to utility	-	-	-	-	-	-	-
10	Total Fixed Assets	3,610.40	-	-	3,610.40	3,610.40	0.05	187.72
11	Non depreciable assets (Land & Land Rights)	-	-	-	-	-	-	-
12	Depreciable assets	3,610.40	-	-	3,610.40	3,610.40	0.05	187.72

TABLE 3-28 GROSS ALLOWABLE DEPRECIATION FOR FY 2023-24 (IN RS. CR) PART B

GROSS ALLOWABLE DEPRECIATION FOR ASSETS AFTER 01.04.2020 OF MVNL FOR FY 2023-24 (IN RS. CR) PART B							
S.No.	Particulars	Opening GFA (as on 01.04.2023)	Addition to GFA	Closing GFA	Average GFA	Depreciation Rate	Allowable Gross Depreciation
1	Land & Land Rights	0.31	0.58	0.89	0.60	-	-
2	Buildings	117.19	98.49	215.68	166.43	0.03	5.56
3	Other Civil Works	4.16	7.71	11.87	8.01	0.03	0.27
4	Plant & Machinery	2,712.01	-299.33	2,412.68	2,562.35	0.05	135.29
5	Lines, Cables, Network etc.	5,715.84	2,093.33	7,809.17	6,762.50	0.05	357.06
6	Vehicles	2.15	3.00	5.15	3.65	0.06	0.23
7	Furniture & Fixtures	4.47	5.18	9.65	7.06	0.06	0.45
8	Office Equipments	59.02	41.31	100.33	79.68	0.06	5.04
9	Capital Expenditure on Assets not belonging to utility	-	-	-	-	-	-
10	Total Fixed Assets	9,124.07	1,950.27	11,074.34	10,099.20	0.05	503.90
11	Non depreciable assets (Land & Land Rights)	-	-	-	-	-	-
12	Depreciable Assets	9,124.07	1,950.27	11,074.34	10,099.20	0.05	503.90

- 3.10.2. Accordingly, the depreciation as approved by the Hon'ble Commission in its Tariff Order dated 24.05.2023 and Revised Estimates as computed above is shown as under:

TABLE 3-29 NET ALLOWABLE DEPRECIATION FOR FY 2022-23 (IN RS. CR)

Particulars	Approved in T.O. dtd. 24.05.2023	Revised Estimates
Gross Allowable Depreciation	652.86	691.62
Less: Equivalent amount of depreciation on assets acquired out of the Consumer Contribution and GoUP Subsidy	142.56	162.89
Net Allowable Depreciation	510.30	528.73

3.11. Provision for Bad and Doubtful Debts

- 3.11.1. The Regulation 46 of the MYT Distribution Regulations, 2019 provides for expenses under bad and doubtful Debts to the extent of 2% of the revenue receivables as specified below:

“46.1 For any Year, the Commission may allow a provision for write off of bad and doubtful debts upto 2% of the amount shown as Revenue Receivables from sale of electricity in the audited accounts of the Distribution Licensee for that Year or the actual write off of bad debts, whichever is less.”

- 3.11.2. The Petitioner has computed bad and doubtful debts at 2% of the revenue receivables as per audited accounts of FY 2022-23.

TABLE 3-30 ALLOWABLE PROVISION FOR BAD AND DOUBTFUL DEBTS FOR FY 2023-24 (IN RS. CR)

Particulars	Approved in T.O. dtd. 24.05.2023	Revised Estimates
Total Revenue Receivables from Retail Sales	18,280.49	14,820.67
% of Provision for Bad and Doubtful Debts	1.60%	2%
Bad and Doubtful Debts as per Regulation	291.73	296.41
Bad Debt Claimed	NA	296.41

3.12. Return on Equity

- 3.12.1. The Regulation 22 of the Distribution MYT Regulations, 2019 provides for return on equity @15% as specified below:

“22.1 Return on equity shall be computed in Rs. terms on equity base at the rate of 14.5% post-tax per annum for the Transmission Licensee and at the rate of 15% post-tax per annum for Distribution Licensee respectively as determined in accordance with Regulation 20.

Provided that assets funded by Consumer Contribution / Deposit works, Capital Subsidies /- Grants and corresponding Depreciation shall not form part of the Capital Cost. Actual Equity infused by the Licensee as per book value shall be considered and shall be used for computation in these Regulations.”

The Petitioner has considered closing equity in true up FY 2022-23 as opening for FY 2023-24. Equity addition during the year has been considered 30% of Capitalisation (Asset put to use) during the year net of consumer contribution, capital subsidies/ grants.

3.12.2. The Return on Equity (RoE) for FY 2023-24 is shown below:

TABLE 3-31 RETURN ON EQUITY (ROE) FOR FY 2023-24 (IN RS. CR)

Particulars	Approved in T.O. dtd. 24.05.2023	Revised Estimates
Opening Equity	3,721.22	3,582.23
Net additions during the year	391.26	585.08
Less: Consumer Contribution	-	-
Less: Grants	-	-
Equity (Closing Balance)	4,112.48	4,167.31
Rate of Return on Equity (%)	14.50%	15.00%
Allowable Return on Equity	567.94	581.22

3.13. Revenue from Sale of Power

3.13.1. The Petitioner has estimated the revenue for FY 2023-24 to be Rs. **14,820.62** Crores from the Sales of **24,448.30** MUs.

3.14. Non-Tariff Income

3.14.1. The Hon'ble Commission has approved non-tariff income in the Tariff Order for FY 2023-24 dated 24.05.2023, the Petitioner has claimed as approved by the Commission for FY 2023-24 as shown below:

TABLE 3-32 NON- TARIFF INCOME FOR FY 2023-24 (IN RS. CR)

Particulars	Approved in T.O. dtd. 24.05.2023	Revised Estimates
NTI	278.79	272.42

3.14.2. It is prayed to the Hon'ble Commission to approve the Non-Tariff Income as claimed by the Petitioner.

3.15. GoUP Subsidy

TABLE 3-33 DETAILS OF APPROVED GOUP SUBSIDY

Consumer Category	FY 2023-24		
	Unit	Subsidy per Unit	Total Subsidy (IN RS. CR)
LMV-1: Domestic Light, Fan & Power			6,846.00
Lifeline (Rural and Urban)	Rs./Unit	3.50	4,500
Rural Schedule unmetered	Rs. /kW/Month	435	228
Rural Schedule metered (for all Consumers)	Rs. / unit		
0-100 Unit		2.70	1,465
101-150 Unit		2.65	653
Private Tube Wells/ Pumping Sets (Rural Schedule)			8,174
Rural Schedule metered and unmetered	Rs./BHP/Month	600	8,174
Total Subsidy			15,020

3.15.1. GoUP has communicated the subsidy rates to the Hon'ble Commission vide Letter No. 798/24-1-2023-1307/2020 dated April 17, 2023 FOR FY 2023-24 as mentioned in table above for FY 2023-24.

3.15.2. The Petitioner estimates Rs. 3,840.02 Crore revenue subsidy from GoUP.

TABLE 3-34 GOUP SUBSIDY FOR FY 2023-24 (IN RS. CR)

Particulars	Revised Estimate
MVVNL	3,840.02

3.15.3. It is further submitted that the Hon'ble Commission in its Tariff order for FY 2023-24 has also recognised the Government subsidy component of LMV-5 Metered Rural Consumers as per the GoUP direction, as under:

8.1.12 Further, the Commission is in receipt of a GoUP letter with Ref: 707/24-P-1/2021 dated 25.3.2021 under Section 108 of EA 2003, wherein GoUP mentioned that since majority of the rural LMV-5 consumers are unmetered, and taking into consideration the impact of Covid pandemic, GoUP has decided that tariff rates of rural LMV-5 unmetered consumers may be levied on LMV-5 metered consumers tariff and has directed the Commission to consider the same.

8.1.13 Subsequently, GoUP again sent a letter with Ref: 812/24-1-21-1307/2020 dated 12.5.2021 for billing LMV-5 rural metered as unmetered, however metering of unmetered consumers will also be done and the meter reading will be used for the purpose of energy accounting and subsidy computation. The difference between the revenue at unmetered rates & revenue as per metered energy & rates, would be provided to the Licensees by GoUP.

8.1.14 Although, this provision is not in conformity of Section 65 of Electricity Act, 2003, in regard to advance subsidy, however, in view of the State Government's

commitment to provide additional subsidy in regards to the above arrangement, **the Commission accepts this proposal and the additional subsidy amount, which will be computed at the time of True-up shall be payable by the State Government in conformity to Section 65 of Electricity Act, 2003.**

3.15.4. In view of the above, the Petitioner submits that the Hon'ble Commission may kindly recognise this GoUP subsidy component separately.

3.16. Annual Performance Review (APR) for FY 2023-24

3.16.1. The Annual Performance Review (APR) for FY 2023-24 is summarised in the table below:

TABLE 3-35 ANNUAL PERFORMANCE REVIEW (APR) FOR FY 2023-24 (IN RS. CR)

S.No	Particulars	APR	
		FY 2023-24	
		Approved in TO dated 24.05.2023	Revised Estimates
I.	Power Purchase or Energy Available at Discom Periphery (MU)	27,115.56	28,841.53
II.	Sale of Power (MU)	24,333.50	24,448.30
III.	Distribution Loss (%)	10.26%	15.23%
A	Expenditure		
a	Cost of Power Procurement	14,735.36	15,535.54
b	Transmission and Load Dispatch Charges	716.12	761.70
c	Gross O&M Expenses	-	-
i	R&M Expense	453.24	440.10
ii	Employee Expenses	869.57	947.45
iii	A&G Expense	325.43	1,019.57
e	Total Gross O&M expenses (i+ii+iii)	1,648.24	2,407.12
f	Smart Metering OPEX	-	28.89
g	Depreciation	510.30	528.73
h	Interest on Long-Term Loan	462.67	451.96
i	Interest on Security Deposit from Consumers and Distribution system Users	33.45	53.46
j	Finance/Bank Charges	-	34.49
k	Interest on Working Capital	164.04	186.99
l	Bad and Doubtful debts	291.73	296.41
m	Return on Equity	587.53	581.22
n	Income Tax	-	-
	Total Expenditure (A)	19,149.44	20,866.52
	Less:	-	-
o	Interest Capitalisation	-	-
p	Employee Capitalisation	450.88	188.93
B	Net Expenditure (A-q-r)	18,698.56	20,677.59
C	Less: Non Tariff Income	278.79	272.42
D	Net Annual Revenue Requirement of Licensee(B-C)	18,419.77	20,405.17

S.No	Particulars	APR	
		FY 2023-24	
		Approved in TO dated 24.05.2023	Revised Estimates
	Receipts	-	-
a	Revenue Assessment at Payable Tariff	18,280.49	14,820.62
	<i>Revenue from Subsidy and Cross subsidy</i>	-	5,232.99
	<i>Revenue Assessment at Full Cost Tariff</i>	-	20,053.61
b	Income from other Business	-	-
c	Disallowances	19.58	-
E	Total Revenue (a+b+c)	18,300.07	14,820.62
		-	-
F	(Shortfall)/Excess before tariff revision impact (E-D)	(119.70)	(5,584.55)
G	Tariff Revision Impact	-	-
H	Shortfall/Excess after tariff revision impact (F+G)	(119.70)	(5,584.55)
I	Govt. Subsidy Received/Declared	-	3,840.02
J	(Shortfall)/Excess(H+J)	(119.70)	(1,744.52)

3.16.2. The Petitioner requests to approve the revised estimates of the ARR claim/Revenue Gap for FY 2023-24 in above Table.

4. Aggregate Revenue Requirement (ARR) for FY 2024-25

4.1. Consumption parameters: Consumer numbers, Connected load, Sales

- 4.1.1. For the purpose of projection of billing determinants (Consumer numbers, connected load and Sales), the distribution licensee has analysed category-wise and sub-category wise data of the sale of electricity, number of consumers, connected / contracted load, etc. of the preceding seven years i.e. from FY 2014-15 to FY 2020-21.
- 4.1.2. The approach being followed is to analyse 7-year, 6-year, 5-year, 4-year, 3-year, 2-year Compound Annual Growth Rates (CAGRs) and year on year growth rate of each sub-category for appropriate projection of billing determinants. The Petitioner has considered the FY 2022-23 billing determinants as a base year for the purpose of computation of billing determinants of FY 2024-25. The Licensee has made effort to focus on reasonable growth for FY 2024-25 making required corrections in the projections of earlier years.
- 4.1.3. It is informed that under the Saubhagya Yojana, the Petitioner has added substantial number of Lifeline consumers at LT network. These consumers are small consumers which are qualified under tariff sub-category "Lifeline consumers". Such consumers have been migrated to IT billing system resulting in change in sub-categories/slabs based on contracted load and energy consumed. This has resulted in significant variation in corresponding sub-category/slabs. The consumers having 1 kW load and consumption upto 100 units are covered in Life line category and any change in this criteria will result in change of sub category / slab of such consumers. This is a dynamic situation which may keep on changing on monthly basis. However, the overall number of consumers within the category show normalized growth.
- 4.1.4. The Category-wise billing determinants as projected by the Petitioner for FY 2024-25 is shown in the Table below:

TABLE 4-1: BILLING DETERMINANTS PROJECTED AS PER EXISTING TARIFF STRUCTURE FOR FY 2024-25

Consumer Category/ Sub-Category	Consumers	Load (kW)	Projected Sales (MU)
LMV-1: Domestic Light, Fan & Power			
Life Line Consumers (both Rural and Urban) (up to 100 kWh/month)	56,98,753	54,37,257	4,395.35

Consumer Category/ Sub-Category	Consumers	Load (kW)	Projected Sales (MU)
Dom: Rural Schedule (unmetered)	208	317	0.82
Dom: Rural Schedule (metered) other than BPL	14,55,764	18,47,375	4,191.02
0-100 kWh/month	9,03,251	10,04,972	1,693.38
101-150 kWh/month	3,62,901	3,69,475	1,159.10
151-300 kWh/month	1,13,491	2,77,106	700.07
Above 300 kWh/Month (Starting from 301 units)	76,120	1,95,822	638.48
Dom: Supply at Single Point for Bulk Load	95	23,256	58.00
Other Metered Domestic Consumers other than BPL	19,26,138	41,57,753	6,405.72
0-100 kWh/month	6,81,960	19,54,144	2,229.79
101-150 kWh/month	4,81,535	8,31,551	1,289.00
151-300 kWh/month	3,60,607	5,82,085	1,236.40
Above 300 kWh/Month (Starting from 301 units)	4,02,037	7,89,973	1,650.52
Sub Total	90,80,958	1,14,65,959	15,050.91
LMV-2:Non Domestic Light, Fan & Power			
Non Dom: Rural Schedule (metered)	1,39,091	3,56,862	503.10
Non Dom: Other Metered Non-Domestic Supply	3,78,082	11,73,104	1,624.69
Load upto 4 kW	3,40,274	8,32,904	1,234.76
Upto 300 kWh / month	2,79,781	6,76,295	820.53
Above 300 kWh/Month	60,493	1,56,609	414.23
Above 4 kW	37,808	3,40,200	389.92
Upto 1000 kWh / month	34,027	3,26,592	271.53
Above 1000 kWh/Month	3,781	13,608	118.40
Sub Total	5,17,173	15,29,966	2,127.79
LMV-3: Public Lamps			
Unmetered	260	4,468	15.23
Unmetered - Gram Panchayat	46	691	2.33
Unmetered - Nagar Palika & Nagar Panchayat	209	3,015	11.03
Unmetered - Nagar Nigam	5	762	1.87
Metered	2,111	74,131	309.74
Metered - Gram Panchayat	479	3,048	9.44
18:00 hrs - 06:00 hrs	479	3,048	9.44
06:00 hrs - 18:00 hrs	-	-	-
Metered - Nagar Palika & Nagar Panchayat	1,176	18,475	86.23
18:00 hrs - 06:00 hrs	1,176	18,475	86.23
06:00 hrs - 18:00 hrs	-	-	-
Metered - Nagar Nigam	456	52,607	214.06
18:00 hrs - 06:00 hrs	456	52,607	214.06
06:00 hrs - 18:00 hrs	-	-	-
Sub Total	2,371	78,599	324.97

Consumer Category/ Sub-Category	Consumers	Load (kW)	Projected Sales (MU)
LMV-4: Light, fan & Power for Institutions			
Inst: Public	53,066	1,58,871	275.48
Inst: Private	4,599	46,268	63.71
Sub Total	57,664	2,05,139	339.20
LMV-5: Private Tube Wells/ Pumping Sets			
Consumers getting supply as per "Rural Schedule"	3,02,360	15,74,227	2,729.62
PTW: Rural Schedule (unmetered) (Total)	565	3,274	8.25
PTW: Rural Schedule (unmetered)	565	3,274	8.25
PTW: Rural Schedule (metered) (Total)	3,01,795	15,70,952	2,721.37
PTW: Rural Schedule (metered)	3,01,795	15,70,952	2,721.37
PTW: Rural Schedule (Energy Efficient Pumps) (metered)	-	-	-
Consumers getting supply as per "Urban Schedule (Metered Supply)"	6,321	38,737	45.30
PTW: Urban Schedule (metered)	6,321	38,737	45.30
Sub Total	3,08,681	16,12,964	2,774.92
LMV 6: Small and Medium Power upto 100 HP (75 kW)			
Consumers getting supply as per "Rural Schedule"	11,694	1,19,671	166.85
Up to 20 kW	11,141	93,733	135.03
Above 20 kW	553	25,938	31.82
Consumers getting supply other than "Rural Schedule"	23,015	2,62,036	437.40
Summer Months (April to September)	23,015	2,62,036	218.70
For load upto 20 kW	18,412	1,83,425	142.16
05:00 hrs to 11:00 hrs	2,976	29,650	22.98
11:00 hrs to 17:00 hrs	7,694	76,652	59.41
17:00 hrs to 23:00 hrs	3,833	38,184	29.59
23:00 hrs to 05:00 hrs	3,909	38,940	30.18
For load above 20 kW	4,603	78,611	76.55
05:00 hrs to 11:00 hrs	744	12,707	12.37
11:00 hrs to 17:00 hrs	1,924	32,851	31.99
17:00 hrs to 23:00 hrs	958	16,364	15.93
23:00 hrs to 05:00 hrs	977	16,689	16.25
Winter Months (October to March)	23,015	2,62,036	218.70
For load upto 20 kW	18,412	1,83,425	142.16
05:00 hrs to 11:00 hrs	2,976	29,650	22.98
11:00 hrs to 17:00 hrs	7,694	76,652	59.41
17:00 hrs to 23:00 hrs	3,833	38,184	29.59
23:00 hrs to 05:00 hrs	3,909	38,940	30.18
For load above 20 kW	4,603	78,611	76.55
05:00 hrs to 11:00 hrs	744	12,707	12.37

Consumer Category/ Sub-Category	Consumers	Load (kW)	Projected Sales (MU)
11:00 hrs to 17:00 hrs	1,924	32,851	31.99
17:00 hrs to 23:00 hrs	958	16,364	15.93
23:00 hrs to 05:00 hrs	977	16,689	16.25
Sub Total	34,709	3,81,706	604.25
LMV-7: Public Water Works			
Consumers getting supply as per "Rural Schedule"	8,753	1,27,612	610.97
Rural Metered	8,418	1,22,621	568.06
Rural Unmetered	335	4,991	42.91
Consumers getting supply other than "Rural Schedule"	7,872	1,42,421	824.23
Urban Metered	7,537	1,37,401	781.22
Urban Unmetered	335	5,019	43.01
Sub Total	16,625	2,70,033	1,435.21
-			
LMV-9: Temporary Supply			
Metered	12,110	28,053	39.68
Metered TS: Individual residential consumers	1,734	3,333	3.19
Metered TS: Others	10,376	24,720	36.49
Unmetered	6	8	0.86
Unmetered TS: Ceremonies	-	-	-
Unmetered TS: Temp shops	6	8	0.86
Sub Total	12,116	28,060	40.54
LMV-11: Electrical Vehicles			
Multi Story Buildings	-	-	-
LMV-1b	-	-	-
HV-1b	-	-	-
Public Charging Station	140	10,097	8.34
LT	132	3,117	1.87
Summer Months (April to September)	132	3,117	0.94
05:00 hrs to 11:00 hrs	21	504	0.15
11:00 hrs to 17:00 hrs	55	1,303	0.39
17:00 hrs to 23:00 hrs	27	649	0.19
23:00 hrs to 05:00 hrs	28	662	0.20
Winter Months (October to March)	132	3,117	0.94
05:00 hrs to 11:00 hrs	21	504	0.15
11:00 hrs to 17:00 hrs	55	1,303	0.39
17:00 hrs to 23:00 hrs	27	649	0.19
23:00 hrs to 05:00 hrs	28	662	0.20
HT	8	6,980	6.47
Summer Months (April to September)	8	6,980	3.23
05:00 hrs to 11:00 hrs	1	1,128	0.52
11:00 hrs to 17:00 hrs	4	2,917	1.35
17:00 hrs to 23:00 hrs	2	1,453	0.67
23:00 hrs to 05:00 hrs	2	1,482	0.69

Consumer Category/ Sub-Category	Consumers	Load (kW)	Projected Sales (MU)
Winter Months (October to March)	8	6,980	3.23
05:00 hrs to 11:00 hrs	1	1,128	0.52
11:00 hrs to 17:00 hrs	4	2,917	1.35
17:00 hrs to 23:00 hrs	2	1,453	0.67
23:00 hrs to 05:00 hrs	2	1,482	0.69
Sub Total	140	10,097	8.34
HV-1: Non-Industrial Bulk Loads			
Commercial Loads / Private Institutions / Non-Domestic Bulk Power with contracted Load 75 kW & above and getting supply at single point on 11 kV & above voltage level.	880	2,32,007	545.89
Supply at 11 kV	440	2,29,687	541.37
Supply above 11 kV	440	2,320	4.52
Public Institutions, Registered Societies, Residential Colonies / Townships, Residential Multi-Storied Buildings including Residential Multi-Storied Buildings with contracted load 75 kW & above and getting supply at Single Point on 11 kV & above voltage levels	880	3,48,011	545.89
Supply at 11 kV	748	3,44,530	541.37
Supply above 11 kV	132	3,480	4.52
Sub Total	1,760	5,80,018	1,091.78
HV-2: Large and Heavy Power above 100 BHP (75 kW)			
HV2 Urban Schedule: Supply at 11 kV	2,277	7,01,398	1,419.62
Summer Months (April to September)	2,277	7,01,398	709.81
05:00 hrs to 11:00 hrs	492	1,51,615	153.43
11:00 hrs to 17:00 hrs	814	2,50,854	253.86
17:00 hrs to 23:00 hrs	466	1,43,621	145.34
23:00 hrs to 05:00 hrs	504	1,55,309	157.17
Winter Months (October to March)	2,277	7,01,398	709.81
05:00 hrs to 11:00 hrs	492	1,51,615	153.43
11:00 hrs to 17:00 hrs	814	2,50,854	253.86
17:00 hrs to 23:00 hrs	466	1,43,621	145.34
23:00 hrs to 05:00 hrs	504	1,55,309	157.17
HV2 Urban Schedule: Supply above 11 kV & upto 66 kV	57	63,767	198.28
Summer Months (April to September)	57	63,767	99.14
05:00 hrs to 11:00 hrs	12	13,784	21.43
11:00 hrs to 17:00 hrs	21	22,806	35.46
17:00 hrs to 23:00 hrs	12	13,057	20.30

Consumer Category/ Sub-Category	Consumers	Load (kW)	Projected Sales (MU)
23:00 hrs to 05:00 hrs	13	14,120	21.95
Winter Months (October to March)	57	63,767	99.14
05:00 hrs to 11:00 hrs	12	13,784	21.43
11:00 hrs to 17:00 hrs	21	22,806	35.46
17:00 hrs to 23:00 hrs	12	13,057	20.30
23:00 hrs to 05:00 hrs	13	14,120	21.95
HV2 Urban Schedule: Supply above 66 kV & upto 132 kV	18	43,040	160.48
Summer Months (April to September)	18	43,040	80.24
05:00 hrs to 11:00 hrs	4	9,304	17.34
11:00 hrs to 17:00 hrs	7	15,393	28.70
17:00 hrs to 23:00 hrs	4	8,813	16.43
23:00 hrs to 05:00 hrs	4	9,530	17.77
Winter Months (October to March)	18	43,040	80.24
05:00 hrs to 11:00 hrs	4	9,304	17.34
11:00 hrs to 17:00 hrs	7	15,393	28.70
17:00 hrs to 23:00 hrs	4	8,813	16.43
23:00 hrs to 05:00 hrs	4	9,530	17.77
HV2 Urban Schedule: Supply above 132 kV	2	5,450	11.78
Summer Months (April to September)	2	5,450	5.89
05:00 hrs to 11:00 hrs	0	1,178	1.27
11:00 hrs to 17:00 hrs	1	1,949	2.11
17:00 hrs to 23:00 hrs	0	1,116	1.21
23:00 hrs to 05:00 hrs	0	1,207	1.30
Winter Months (October to March)	2	5,450	5.89
05:00 hrs to 11:00 hrs	0	1,178	1.27
11:00 hrs to 17:00 hrs	1	1,949	2.11
17:00 hrs to 23:00 hrs	0	1,116	1.21
23:00 hrs to 05:00 hrs	0	1,207	1.30
HV2 Rural Schedule: Supply at 11 kV	553	1,95,676	375.77
Sub Total	2,907	10,09,332	2,165.93
HV-3: Railway Traction			
HV3 Railway Traction (at, below and above 132 kV)	-	-	-
HV3 Metro Traction (at, below and above 132 kV)	2	13,714	37.23
Sub Total	2	13,714	37.23
HV-4: Lift Irrigation & P. Canals above 100 BHP (75 kW)			
HV4 Supply at 11kV	17	21,286	57.99
HV4 Supply above 11kV & upto 66kV	15	7,864	26.87
HV4 Supply above 66 kV & upto 132kV	-	-	-
Sub Total	32	29,150	84.86

Consumer Category/ Sub-Category	Consumers	Load (kW)	Projected Sales (MU)
			-
Extra State Consumer	1	5,000	26.51
			-
Bulk Supply Consumer	-	-	-
			-
Grand Total	1,00,35,140	1,72,19,737	26,112.43

- 4.1.5. The Hon'ble Commission is requested to approve the billing determinants as submitted in the above table.

4.2. Distribution Loss

- 4.2.1. The Petitioner has discussed the approach for the Distribution loss trajectory in detail in True-up section for FY 2022-23 above. Accordingly, the Petitioner projects the following distribution loss for FY 2024-25.

TABLE 4-2 DISTRIBUTION LOSS (%) FOR FY 2024-25

Distribution Loss (%)	FY 2024-25	
	Approved in Business Plan Order	Projected
MVVNL	9.90%	14.20%

4.3. Energy Balance

- 4.3.1. The Energy Balance for FY 2024-25 is shown in the Table below:

TABLE 4-3 ENERGY BALANCE FOR FY 2024-25

Particulars	Projected
Retail Sales	26,112.43
Distribution Losses	14.20%
Energy at Discom Periphery for Retail Sales	30,434.07
Intra-State Transmission Losses	3.18%
Energy Available at State periphery for Transmission	31,433.66
Energy Purchase from Stations connected to Intra-State Transmission network (UPPTCL)	20,341.99
Energy Purchase from Stations connected to Inter-State Transmission network (PGCIL)	11,091.67
Inter-State Transmission Loss	3.77%
Net Energy Received from Stations connected to Inter-State Transmission network at UPPTCL Periphery (Ex-Bus)	11,526.32
Power Purchase Required & Billed Energy (MU) (Ex-Bus)	31,868.31

4.4. Power Purchase Expense

- 4.4.1. UPPCL is procuring power on behalf of Discoms at consolidated level. Accordingly, the Power Purchase section represents the consolidated power purchase at UPPCL level. The consolidated energy balance (detailed Energy Balance with further break-up of inter-State energy has been submitted in Format F13L of MYT Formats) for FY 2024-25 is as follows: -

TABLE 4-4 CONSOLIDATED ENERGY REQUIREMENT FOR FY 2024-25

Particulars	Consolidated
Retail Sales	1,22,754
Distribution Losses	13.09%
Energy at Discom Periphery for Retail Sales	1,41,245
Intra-State Transmission Losses	3.18%
Energy Available at State periphery for Transmission	1,45,884
Energy Purchase from Stations connected to Intra-State Transmission network (UPPTCL)	94,408
Energy Purchase from Stations connected to Inter-State Transmission network (PGCIL)	51,477
Inter-State Transmission Loss	3.77%
Net Energy Received from Stations connected to Inter-State Transmission network at UPPTCL Periphery (Ex-Bus)	53,494
Power Purchase Required & Billed Energy (MU) (Ex-Bus)	1,47,902

- 4.4.2. This power purchase requirement is primarily fulfilled through multiple sources, with whom UPPCL and Discoms have long-term tied-up allocated capacities. The main sources of power procurement are broadly categorised as under:
- State Generating Stations – UPRUVNL and UJVNL
 - Central Generating Stations – NTPC, NHPC, NPCIL, THDC, SJVNL
 - Independent Power Plants (IPPs) and Joint Ventures (JVs)
 - Renewable Energy Generating Stations – Solar, Wind, Biomass, Bagasse, MSW, etc.
- 4.4.3. In addition to the above sources, UPPCL is also required to purchase power from short-term sources including power trading companies, Power Exchanges in case of shortfall from regular sources or to meet the deviation from estimated demand depending on the availability.
- 4.4.4. It is submitted that there are technical, regulatory and operational issues related to MOD preparation based on Merit Order Despatch and Optimization of Power Purchase Regulations, 2021. It has been further

communicated that licensee cannot address these issues as these are in the domain of SLDC : -

- i. Actual allowable Power Purchase Cost is to be computed as per clause 16.2 Multi Year Tariff for Distribution and Transmission (First Amendment) Regulations, 2020 reproduced as under: -

(Power Purchase Cost) actual allowable for a particular month will be total of actual variable costs of all the applicable variable cost of power purchase sources by applying MOD upto the (Power Purchase Quantum) actual allowable for that particular month.

- ii. Hon'ble Commission in its computation has interpreted that computation of per unit variable cost shall be carried out plant wise from lowest to highest variable cost and thereafter the cut-off is to be applied as per actual allowable quantum for the month for these plants.

SLDC implements the MOD for each 15 minutes of 96 time blocks, each day on a real time basis, taking into **account the following provisions of Merit Order Dispatch and Optimization of Power Purchase Regulations, 2021 related to various technical, regulatory and operational limits of generation and transmission system:**

- (I) 2. (19) "Merit Order Dispatch (MOD)" means dispatch of generating stations to supply electricity in accordance with the merit order based on variable charges taking into account any technical, regulatory and operational limits of generation and transmission facilities.
- (II) 11. (1) The technical minimum for operation in respect of a coal fired/gas fired/ multi fuel based thermal generating unit connected to the STU shall be 55% of its installed capacity or as mentioned in the ISGS."

The scheduled power of SLDC is based on the lower variable cost taking into account technical, regulatory and operational limits of generation and transmission facilities, which shall have been considered for implementing Actual MOD as per MOD Regulations.

- iii. As per the regulatory framework, the above provisions of the Regulation for all the plants are essential to be considered, which cannot be considered when the MOD is re-applied monthly. As per the above provisions of the UPERC Merit Order Dispatch and Optimization of Power Purchase Regulations, 2021, it is the responsibility of SLDC to prepare MOD stack and schedule power considering all technical, regulatory and operational constraints, therefore, any clarification pertaining to MOD stack, schedule of power may be dealt with by SLDC only as per Regulatory provisions, MOD cannot be applied without complying above provisions of the Regulations. The relevant portion of the Regulation is reproduced below:-

5. (2) The Distribution Licensee shall verify and submit the details of variable charges of all the Generating Stations/units from which they are procuring power for preparing MOD stack based on Variable Charges of (n-1)th month. In case the Variable Charges for (n-2)th month needs to be considered and submitted to SLDC for preparation of the MOD stack by 7th day and 22nd day of every month with intimation to the seller with whom it has the PPA.

5. (3) SLDC shall prepare the MOD stack by the 12th day of every month for the data it has received by 7th day of the month, which would be effective from the 16th day of the month till the last day of the month unless revised by SLDC. SLDC shall upload the fortnightly MOD stack on its website in the format given at Annexure-1 by 15:00 hours on 12th of every month.

5. (4) Similarly, SLDC shall prepare the MOD stack by the 27th day of every month for the data it has received by 22nd day of every month, which would be effective from the 1st day of every subsequent month till the 15th day of that month unless revised by SLDC. SLDC shall upload the fortnightly MOD stack on its website in the format given in Annexure-1 by 15:00 hours on the 27th of every month.

As per the above provisions, SLDC is required to prepare the Stack twice in a month; thus, two separate MODs stacks are implemented in a particular month. For each MOD the generating plant qualifying under merit can be different.

Considering the facts mentioned above, the results of MOD implemented on the power purchase data being submitted with the Petition are not reflecting the true picture and should not be considered for fuel surcharge computation.

- 4.4.5. It is submitted that the power procurement from different sources is undertaken by adopting Merit Order Despatch (MoD) principle for optimal utilization of the available sources at least variable cost. For projection of availability, the entire power available from all the tied-up sources during the financial year to meet the demand have been considered. Thereafter, the MoD principle has been applied on the generating stations not having must-run status, on monthly basis to arrive at the projected power purchase for the month and accordingly the power purchase cost for the entire FY 2023-24 is computed. While full fixed (capacity) charges have been considered for all the generating stations, in respect of generating stations covered under MoD principles, the variable charges corresponding to the cheaper sources have been considered, whereas no variable charges have been considered in respect of energy not scheduled for power purchase.
- 4.4.6. Here, it is important to note that considering the capacity available and the demand projection on month-to-month basis, there is no power procurement scheduled from short-term sources, i.e. Traders or power exchange during FY 2024-25. This is due to the reason that the MoD principle has been applied on month on month basis. However, as the actual power is scheduled on 15-minute slot basis, there are bound to be deviation from the MoD, due to actual availability of long-term sources for these slots. Therefore, the actual power procurement from various sources is bound to vary accordingly. Further, as already discussed, there shall also be requirement to purchase power from short-term sources including power trading companies, Power Exchanges in case of shortfall from regular sources or to meet the

deviation from estimated demand depending on the availability. Accordingly, the Hon'ble Commission is requested to consider actual power purchase at the time of Truing-up and/or computation of Fuel Surcharge Rate.

- 4.4.7. It is further submitted that the exchange or short-term power is being procured when the actual power procurement from various sources is vary, as the actual power is scheduled on 15-minute slot basis. Further, there shall also be requirement to purchase power from short-term sources including power trading companies, Power Exchanges in case of shortfall from regular sources or to meet the deviation from estimated demand depending on the availability.
- 4.4.8. In this regard to the short-term power purchase, it is respectfully submitted that demand is forecasted on hourly basis considering hourly historical data for each day. Considering utility in planning and procurement, Monthly Demand Characteristic Curve with hourly resolution, representing Average Demand for the respective hour for the entire month, is forecasted. In addition to the above, hourly peak demand for the respective month is also forecasted.
- 4.4.9. Considering that, there is a significant variation in hourly Average and Peak Demand for a month, balance is to be maintained for minimizing over procurement. To optimize and avoid over procurement based on peak demand for the entire month.
- 4.4.10. Considering the present and upcoming plants availability and based on historic data, Generation from hydro plants have been considered as per their historic schedules. The following upcoming plants are considered as per the expected COD.

TABLE 4-5 COD OF UPCOMING PLANTS FOR FY 2024-25

COD of Upcoming Plants						
S.No	Financial Year	Plant Name	Type	Generator	COD (Expected)	U P (share)
1	2023-24	SUBANSIRI LOWER (8x250 MW)	Hydro	NHPC	2 Units in March, 2024	46
2		JAWAHARPUR *(2x660 MW)	Thermal	UPRUVNL	Unit1- 15.10.2023	660
3		OBRA -C *(2x660MW)	Thermal	UPRU	Unit 1- 30.09.2023	660
4		GHATAMPUR* (3x660MW)	Thermal	UPRVUNL+NLC	Unit I- 31.10.2023	495.76
5		JAWAHARPUR* (2x660 MW)	Thermal	UPRUVNL	Unit2- 15.02.2024	660
6		OBRA-C * (2x660MW)	Thermal	UPRUVNL	Unit2- 28.02.2024	660
7		GHATAMPUR* (3x660MW)	Thermal	UPRVUNL+NLC	Unit 2- 31.01.2024	495.76

COD of Upcoming Plants						
S.No	Financial Year	Plant Name	Type	Generator	COD (Expected)	U P (share)
8		KHURJA STPP * (2x660 MW)	Thermal	THDC	Unit1-Feb 2024	427.2
9		GHATAMPUR* (3x660MW)	Thermal	UPRVUNL+NLC	Unit 3- 31.03.2024	495.76
10	2024-2025	PANKI (660MW) (Ext.)	Thermal	UPRUVNL	30.06.2024	660
11		SUBANSIRI LOWER (8x250 MW)	Hydro	NHPC	6 Units in Oct 2024	136
12		PARBATI-II (4x200 MW)	Hydro	NHPC	45505	156
13		KHURJA STPP * (2x660 MW)	Thermal	THDC	Unit 2-Aug 2024	427.2
14		TAPOVAN VISHNU- GARH*(4x130 MW)	Hydro	NTPC	45536	100

4.4.11. The petitioner has identified power availability GAP in peak hours for the months of April to September (15th) FY 2024-25. As such UPPCL holding company of the petitioner has a proposed power procurement plan for Apr-24 to Sept-24 (15th) of FY 2024-25 as below:

TABLE 4-6 POWER PROCUREMENT PLAN FOR FY 2024-25 (MW)

Month	Predicted GAP in peak hours (in MUs)	Proposed DEEP Quantum (in MW) : 85% of predicted GAP
1	2	3 = 85%*2
Apr	533	453
May	746	634
Jun	1164	989
Jul	851	723
Aug	809	688
Sep (up to 15th)	869	739
Total	4972	4226

4.4.12. Considering the expected demand and availability, the hourly surplus and deficits are as below:

TABLE 4-7 DEMAND SUPPLY GAP FOR FY 2024-25

Time	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24
00:00-01:00	-26	-2090	-5603	-3936	-3439	-5049
01:00-02:00		-1837	-5263	-3374	-2843	-4699

Time	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24
02:00-03:00		-1550	-4935	-2916	-2326	-4344
03:00-04:00		-1081	-4431	-2429	-1722	-3811
04:00-05:00		-671	-4128	-2050	-1225	-3379
05:00-06:00			-1354			-1971
06:00-07:00						-420
11:00-12:00			-788			
12:00-13:00			-1396			-319
13:00-14:00			-1619			-536
14:00-15:00			-1853			
15:00-16:00			-876			
18:00-19:00			-539			
19:00-20:00	-342	-1503	-4030	-2360	-2659	-3831
20:00-21:00	-657	-2175	-5434	-3799	-3725	-5004
21:00-22:00	-690	-2530	-5905	-4404	-4217	-5636
22:00-23:00	-399	-2185	-5677	-4470	-4298	-5624
23:00-24:00	-279	-2238	-5621	-4408	-4154	-5866

Disclaimer:

Note:

1) The gap between demand and availability is calculated based on the scheduled rostering till Sep-22 (summer months) in day time (Off-Peak hours) keeping in consideration that the same rostering pattern shall be continued further.

2) The Forecasted Demand is calculated based on the previous demand pattern and current coal scenario and may vary based on prevailing demand supply position and availability of coal.

4.4.13. The Petitioner requests the Hon'ble Commission may kindly allow the short-term power purchases to fulfil contingency requirement of the Licensee via bilateral, power exchange, traders, etc.

4.4.14. The assumptions considered for projection of power purchase quantum and cost is as follows:

TABLE 4-8 ASSUMPTIONS CONSIDERED FOR FY 2024-25

Sl. No.	Particulars	Assumptions
i	Power Purchase Quantum	Month wise power purchase quantum for FY 23-24 & remaining months of FY 2022-23 has been projected based on the monthly average PLF of generating stations from April 2017 to March 2022. For upcoming generating thermal generating stations of UPRVUNL, 85% PLF is considered.
ii	Fixed & Energy Charges	The fixed charges have been computed based on the fixed charges as per actual payable for FY 2022-23 with escalation factor of 2%. The energy charges have been computed based on actual average energy charge for FY 2022-23 with escalation factor of 5.5%. For upcoming generating stations, rate for similar units have been considered.
2	State Hydro Generating Stations (UPJVNL)	
S. No.	Particulars	Assumptions
i	Power Purchase Quantum	In case of existing generating stations, the net power purchase quantum for FY 2023-24 is projected based on the monthly average PLF of past years from April, 2018 (or month of COD, whichever is later) to March 2023.
ii	Fixed & Energy Charges	The fixed charges have been computed based on the fixed charges as per actual payable for FY 2022-23 with escalation factor of 2%. The energy charges have been computed based on actual average energy charge for FY 2022-23 with escalation factor of 2%. For upcoming generating stations, rate for similar units have been considered.
3 (A)	Central Generating Stations (NTPC)	
S. No.	Particulars	Assumptions
i	Power Purchase Quantum	In case of existing generating stations, the net power purchase quantum for FY 2022-23 is projected based on the monthly average PLF of past years from April, 2018 (or month of COD, whichever is later) to March 2023.
ii	Fixed & Energy Charges	The fixed charges have been computed based on the fixed charges as per actual payable for FY 2022-23 with escalation factor of 2%. The energy charges have been computed based on actual average energy charge for FY 2022-23 with escalation factor of 5.5%.
3 (B)	Central Generating Stations (NHPC)	
S. No.	Particulars	Assumptions
i	Power Purchase Quantum	In case of existing generating stations, the net power purchase quantum for FY 2022-23 is projected based on the monthly average PLF of past years from April, 2018 (or month of COD, whichever is later) to March 2023.
ii	Fixed & Energy Charges	The fixed charges have been computed based on actual payable for FY 2022-23 with escalation factor of 2%. The energy charges have been computed based on actual average energy charge for FY 2022-23 with escalation factor of 2%. For upcoming generating stations, rate for similar units have been considered.
3 (C)	Central Generating Stations (NPCIL)	
S. No.	Particulars	Assumptions
i	Power Purchase Quantum	Generation for FY 22-23 for the months from Oct 22 to Mar 23 & for FY 2023-24 has been projected based on the monthly average PLF of past year from April, 2018 (or month of COD, whichever is later) to March 2023.
ii	Fixed & Energy Charges	The fixed charges have been computed based on actual payable for FY 2022-23 with escalation factor of 2%. The energy charges have been computed based on actual average energy charge for FY 2022-23 with escalation factor of 2%. For upcoming generating stations, rate for similar units have been considered.
3 (D)	Central Generating Stations (SJVN)	
S. No.	Particulars	Assumptions
i	Power Purchase Quantum	In case of existing generating stations, the net power purchase quantum for FY 2023-24 is projected based on the monthly average PLF of past years from April, 2018 (or month of COD, whichever is later) to March 2023.

ii	Fixed & Energy Charges	The fixed charges have been computed based on actual payable for FY 2022-23 with escalation factor of 2%. The energy charges have been computed based on actual average energy charge for FY 2022-23 with escalation factor of 2%. For upcoming generating stations, rate for similar units have been considered.
3 (E)	Central Generating Stations (THDC- HYDRO)	
S. No.	Particulars	Assumptions
i	Power Purchase Quantum	In case of existing generating stations, the net power purchase quantum for FY 2023-24 is projected based on the monthly average PLF of past years from April, 2018 (or month of COD, whichever is later) to March 2023.
ii	Fixed & Energy Charges	The fixed charges have been computed based on actual payable for FY 2022-23 with escalation factor of 2%. The energy charges have been computed based on actual average energy charge for FY 2022-23 with escalation factor of 2%. For upcoming generating stations, rate for similar units have been considered.
3 (F)	Central Generating Stations (NTPC- HYDRO)	
S. No.	Particulars	Assumptions
i	Power Purchase Quantum	In case of existing generating stations, the net power purchase quantum for FY 2023-24 is projected based on the monthly average PLF of past years from April, 2018 (or month of COD, whichever is later) to March 2023. For upcoming generating station average monthly PLF of 50% have been considered.
ii	Fixed & Energy Charges	The fixed charges have been computed based on actual payable for FY 2022-23 with escalation factor of 2%. The energy charges have been computed based on actual average energy charge for FY 2022-23 with escalation factor of 2%. For upcoming generating stations, rate for similar units have been considered.
4 (A)	IPPs / JVs Thermal	
S. No.	Particulars	Assumptions
i	Power Purchase Quantum	For existing generating stations, the net power purchase quantum for FY 2023-24 is projected based on the monthly average PLF of past years from April, 2018 (or month of COD, whichever is later) to March 2023. For new generating stations, net generation is projected based on 85% PLF.
ii	Fixed & Energy Charges	The fixed charges have been computed based on actual payable for FY 2022-23 with escalation factor of 2%. The energy charges have been computed based on actual average energy charge for FY 2022-23 with escalation factor of 5.5%. For upcoming generating stations, rate for similar units have been considered.
4 (B)	IPPs / JVs HYDRO	
S. No.	Particulars	Assumptions
i	Power Purchase Quantum	In case of existing generating stations, the net power purchase quantum for FY 2023-24 is projected based on the monthly average PLF of past years from April, 2018 (or month of COD, whichever is later) to March 2023. For upcoming generating station average monthly PLF of 50% have been considered.
ii	Fixed & Energy Charges	The fixed charges have been computed based on actual payable for FY 2022-23 with escalation factor of 2%. The energy charges have been computed based on actual average energy charge for FY 2022-23 with escalation factor of 2%. For upcoming generating stations, rate for similar units have been considered.
	Other Sources (SOLAR)	
S. No.	Particulars	Assumptions
i	Power Purchase	The net power purchase quantum for FY 2023-24 is projected based on the capacity allocation available (MW) submitted before Commission (provided by PPA) and CUF is

	Quantum	considered at 19%. Further, in the absence of specific COD available for upcoming generating capacities, the generation has been computed at 50% of the capacity addition during the FY.
ii	Fixed & Energy Charges	The energy charges have been computed based on the weighted average energy charge rate of solar generating stations
Other Sources (WIND)		
S. No.	Particulars	Assumptions
i	Power Purchase Quantum	The net power purchase quantum for FY 2023-24 is projected based on the capacity allocation available (MW) submitted before Commission (provided by PPA) and CUF is considered at 25%. Further, in the absence of specific COD available for upcoming generating capacities, the generation has been computed at 50% of the capacity addition during the FY.
ii	Fixed & Energy Charges	The energy charges has been computed based on the weighted average energy charge rate of wind generating stations.
Other Sources (BIOMASS)		
S. No.	Particulars	Assumptions
i	Power Purchase Quantum	The net power purchase quantum for FY 2023-24 is projected based on the capacity allocation available (MW) submitted before Commission (provided by PPA) and CUF is considered as 50% in line with UPERC (Captive and Renewable Energy Generating Plants) Regulations, 2019).
ii	Fixed & Energy Charges	The energy charges have been comuted based on the weighted average energy charge rate of Biomass generating stations
Other Sources (BAGASSE)		
S. No.	Particulars	Assumptions
i	Power Purchase Quantum	The net power purchase quantum for FY 2023-24 is projected based on the capacity allocation available (MW) submitted before Commission (provided by PPA) and CUF is considered as 50% in line with UPERC (Captive and Renewable Energy Generating Plants) Regulations, 2019).
ii	Fixed & Energy Charges	The energy charges have been computed based on the weighted average energy charge rate of Bagasse based generating stations
Other Sources (MSW)		
S. No.	Particulars	Assumptions
i	Power Purchase Quantum	The net power purchase quantum for FY 2023-24 is projected based on the capacity allocation available (MW) submitted before Commission (provided by PPA) and CUF is considered as 75% in line with UPERC (Captive and Renewable Energy Generating Plants) Regulations, 2019).
ii	Fixed & Energy Charges	The energy charges have been considered in line with UPERC (Captive and Renewable Energy Generating Plants) Regulations, 2019).

4.4.15. The details of power purchase cost from generating stations for FY 2024-25 based on above assumptions is shown in the table below:

TABLE 4-9 GENERATING STATION-WISE POWER PURCHASE COST & PER UNIT TOTAL COST FOR FY 2024-25

SN	Source of Power (Station wise)	FY 2024-25						
		Units despatched after MOD (MU)	Annual Fixed Charges		Annual Energy/ Variable Charge		Total Cost	
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)
A	Long term Sources							
a	Power procured from own Generating Stations (if any)							
b	From State Generating Stations Thermal							
1	ANPARA-A	3,543.60	0.79	281.48	2.32	821.67	3.11	1,103.16
2	ANPARA-B	6,543.75	0.41	267.82	2.06	1,349.60	2.47	1,617.42
3	PANKI	-	-	-	-	-	-	-
4	PARICHHA	-	-	-	-	-	-	-
5	PARICHHA EXT.	-	-	322.39	-	-	-	322.39
6	OBRA-A	-	-	-	-	-	-	-
7	OBRA-B	4,019.98	0.95	382.75	2.74	1,101.34	3.69	1,484.10
8	HARDUAGANJ	336.71	-	-	2.13	71.66	2.13	71.66
9	HARDUAGANJ EXT.	-	-	553.89	-	-	-	553.89
10	PARICHHA EXT. STAGE-II	-	-	489.15	-	-	-	489.15
11	ANPARA-D	6,059.65	1.87	1,132.74	2.01	1,219.07	3.88	2,351.81
12	Panki Extension	3,109.01	2.12	659.55	2.28	708.48	4.40	1,368.03
13	HARDUAGANJ EXT. Stage II	-	-	690.33	-	-	-	690.33
14	OBRA-C	8,386.24	1.81	1,516.78	2.20	1,848.15	4.01	3,364.93
15	Jawaharpur	9,263.57	1.84	1,704.50	2.65	2,453.92	4.49	4,158.42
	Sub-Total	41,262.50	1.94	8,001.38	2.32	9,573.90	4.26	17,575.28

SN	Source of Power (Station wise)	FY 2024-25						
		Units despatched after MOD (MU)	Annual Fixed Charges		Annual Energy/ Variable Charge		Total Cost	
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)
c	From State Generating Stations Hydro							
1	RIHAND	476.14	0.51	24.28	0.48	22.91	0.99	47.19
2	OBRA (H)	254.51	0.43	10.98	0.43	10.94	0.86	21.91
3	MATATILA	66.98	0.47	3.16	0.49	3.29	0.96	6.45
4	KHARA	287.40	0.44	12.53	0.48	13.84	0.92	26.37
5	UGC	25.83	-	-	2.94	7.61	2.94	7.61
6	SHEETLA	2.05	-	-	1.60	0.33	1.60	0.33
7	BELKA	3.01	-	-	2.20	0.66	2.20	0.66
8	BABAIL	3.33	-	-	2.96	0.98	2.96	0.98
	Sub-Total	1,119.26	0.46	50.94	0.54	60.56	1.00	111.50
d	From Central Sector Generating Stations							
a	Thermal (NTPC)							
1	ANTA GPS	-	-	53.15	-	-	-	53.15
2	AURAIYA GPS	-	-	108.36	-	-	-	108.36
3	DADRI GPS	-	-	101.62	-	-	-	101.62
4	JHANOR GPS	-	-	0.01	-	-	-	0.01
5	KAWAS GPS	-	-	0.01	-	-	-	0.01
6	TANDA -TPS	-	-	381.31	-	-	-	381.31
7	FGUTPS-I	-	-	186.82	-	-	-	186.82
8	FGUTPS-II	-	-	103.29	-	-	-	103.29
9	FGUTPS-III	-	-	59.19	-	-	-	59.19
10	FGUTPS-IV	-	-	276.98	-	-	-	276.98
11	FSTPS	-	-	20.09	-	-	-	20.09
12	KHTPS-I	-	-	56.96	-	-	-	56.96

SN	Source of Power (Station wise)	FY 2024-25						
		Units despatched after MOD (MU)	Annual Fixed Charges		Annual Energy/ Variable Charge		Total Cost	
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)
13	KHTPS-II	-	-	196.01	-	-	-	196.01
14	NCTPS-I	-	-	57.95	-	-	-	57.95
15	NCTPS-II	-	-	112.96	-	-	-	112.96
16	RIHAND-I	2,192.60	0.92	202.72	1.79	391.99	2.71	594.71
17	RIHAND-II	2,189.46	0.79	172.35	1.72	375.51	2.50	547.86
18	RIHAND-III	2,409.13	1.45	350.50	1.69	408.24	3.15	758.74
19	SINGRAULI	5,202.12	0.71	367.47	1.65	857.60	2.35	1,225.07
20	KORBA-I STPS	19.50	0.61	1.19	1.70	3.32	2.31	4.51
21	KORBA-III STPS	9.41	1.03	0.97	1.62	1.53	2.65	2.49
22	MAUDA-I STPS	-	-	5.11	-	-	-	5.11
23	MAUDA-II STPS	-	-	7.05	-	-	-	7.05
24	SOLAPUR TPS	-	-	8.23	-	-	-	8.23
25	SIPAT-I STPS	33.34	1.13	3.78	2.36	7.87	3.49	11.65
26	SIPAT-II STPS	12.37	0.92	1.14	2.62	3.24	3.54	4.38
27	VINDHYANCHAL-I STPS	17.52	0.72	1.27	1.77	3.10	2.49	4.37
28	VINDHYANCHAL-II STPS	13.05	0.63	0.82	1.56	2.03	2.18	2.85
29	VINDHYANCHAL-III STPS	14.19	0.76	1.08	1.68	2.38	2.44	3.47
30	VINDHYANCHAL-IV STPS	17.20	1.33	2.29	1.67	2.87	3.00	5.17
31	VINDHYANCHAL-V STPS	9.01	1.38	1.25	1.73	1.56	3.11	2.80
32	TANDA -II-TPS	-	-	1,025.63	-	-	-	1,025.63
33	NABINAGAR POWER PROJECT	1,466.80	0.70	102.72	2.98	437.09	3.68	539.82
34	APCPL	-	-	18.99	-	-	-	18.99
35	GODARWARA STPS-I	-	-	7.35	-	-	-	7.35
36	LARA STPS-I	27.09	1.50	4.06	2.92	7.92	4.42	11.98
37	KHARGONE STPS	-	-	7.05	-	-	-	7.05
	Sub-Total	13,632.80	2.94	4,007.74	1.84	2,506.25	4.78	6,513.99
e	NPCIL							

SN	Source of Power (Station wise)	FY 2024-25						
		Units despatched after MOD (MU)	Annual Fixed Charges		Annual Energy/ Variable Charge		Total Cost	
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)
1	KAPS	5.98	-	-	2.35	1.40	2.35	1.40
2	NAPP	1,067.41	-	-	3.10	330.66	3.10	330.66
3	TAPP-3 & 4	18.54	-	-	3.54	6.56	3.54	6.56
4	RAPP-3 & 4	475.62	-	-	3.47	164.95	3.47	164.95
5	RAPP-5 & 6	657.87	-	-	4.06	267.20	4.06	267.20
	Sub-Total	2,225.41	-	-	3.46	770.77	3.46	770.77
f	Hydro (NHPC)							
1	SALAL	237.16	0.83	19.62	0.65	15.44	1.48	35.05
2	TANAKPUR	92.88	2.45	22.77	1.70	15.75	4.15	38.52
3	CHAMERA-I	449.26	0.91	40.66	1.18	53.17	2.09	93.84
4	URI	578.82	0.93	54.10	0.86	49.50	1.79	103.60
5	CHAMERA-II	300.18	1.30	38.99	1.05	31.39	2.34	70.38
6	DHAULIGANGA	258.29	1.57	40.46	1.28	33.10	2.85	73.56
7	DULHASTI	493.85	2.29	112.88	2.37	116.86	4.65	229.74
8	SEWA-II	120.81	3.33	40.19	2.75	33.28	6.08	73.47
9	CHAMERA-III	220.99	2.52	55.72	2.05	45.29	4.57	101.01
10	URI-II	332.20	2.22	73.66	1.99	66.05	4.21	139.71
11	PARBATI-III HEP	141.90	4.88	69.25	1.60	22.72	6.48	91.97
12	KISHANGANGA	551.72	2.65	146.28	2.05	113.02	4.70	259.31
13	PARBATI-II	449.44	2.25	101.12	2.34	105.21	4.59	206.33
14	SUBANSIRI LOWER	491.44	2.40	117.98	2.34	115.04	4.74	233.02
15	PAKALDUL	-	-	-	-	-	-	-
	Sub-Total	4,718.93	1.98	933.67	1.73	815.82	3.71	1,749.50
g	HYDRO (NTPC)							
1	KOLDAM HPS	612.77	3.01	184.57	2.54	155.63	5.55	340.19

SN	Source of Power (Station wise)	FY 2024-25						
		Units despatched after MOD (MU)	Annual Fixed Charges		Annual Energy/ Variable Charge		Total Cost	
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)
2	TAPOVAN VISHNUGARH	251.35	2.25	56.55	-	-	2.25	56.55
3	LATA TAPOVAN HEP	-	-	-	-	-	-	-
4	SINGRAULI SHPS	13.34	-	-	5.24	6.99	5.24	6.99
	Sub-Total	877.46	2.75	241.12	1.85	162.62	4.60	403.74
h	THDC							
	HYDRO							
1	TEHRI	1,205.21	2.02	242.97	2.03	244.96	4.05	487.93
2	KOTESHWAR	498.66	2.45	122.11	2.51	125.12	4.96	247.23
3	Dhukwan	78.43	-	-	5.07	39.79	5.07	39.79
4	VISHNUGARH PIPAL KOTHI	-	-	-	-	-	-	-
	Thermal	-	-	-	-	-	-	-
1	KHURJA STPP	4,993.97	2.50	1,248.49	2.78	1,389.60	5.28	2,638.10
	Sub-Total	6,776.27	6.96	1,613.57	2.66	1,799.47	5.04	3,413.04
i	SJVN							
1	RAMPUR	268.32	2.84	76.32	2.15	57.68	4.99	133.99
2	NATHPA JHAKRI	1,031.18	1.50	154.58	1.23	126.82	2.73	281.40
	Sub-Total	1,299.50	1.78	230.89	1.42	184.50	3.20	415.39
j	NEEPCO	-	-	-	-	-	-	-
1	Kameng HEP	248.09	-	-	4.16	103.25	4.16	103.25
k	IPP/JV	-	-	-	-	-	-	-
	HYDRO	-	-	-	-	-	-	-
1	TALA	119.74	-	-	2.36	28.28	2.36	28.28
2	VISHNU PRAYAG	1,561.26	0.16	25.47	1.08	167.88	1.24	193.35

SN	Source of Power (Station wise)	FY 2024-25						
		Units despatched after MOD (MU)	Annual Fixed Charges		Annual Energy/ Variable Charge		Total Cost	
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)
3	KARCHAM	789.12	1.70	134.31	1.47	115.74	3.17	250.05
4	TEESTA-III	927.81	3.19	296.02	2.82	261.95	6.01	557.97
5	SRI NAGAR HEP	1,250.79	4.08	510.63	3.34	417.41	7.42	928.05
6	Rajghat Hydro	-	-	-	-	-	-	-
7	Hydro (Competitive Bidding)	1,501.44	-	-	2.72	408.08	2.72	408.08
	Thermal	-	-	-	-	-	-	-
1	Meja Thermal Power Plant	6,504.10	2.13	1,386.83	3.47	2,256.75	5.60	3,643.58
2	LANCO	7,064.33	0.84	590.71	2.77	1,958.50	3.61	2,549.21
4	BEPL BARKHERA	-	-	155.94	-	-	-	155.94
5	BEPL KHAMBHAKHERA	-	-	157.67	-	-	-	157.67
6	BEPL KUNDRAKHI	-	-	156.89	-	-	-	156.89
7	BEPL MAQSOODAPUR	-	-	155.45	-	-	-	155.45
8	BEPL UTRAULA	-	-	161.44	-	-	-	161.44
9	KSK MAHANADI	1,863.27	7.94	1,479.33	3.64	677.59	11.58	2,156.92
10	LALITPUR	-	-	3,179.52	-	-	-	3,179.52
11	M.B.POWER (PTC)	2,688.01	2.39	642.26	1.49	400.19	3.88	1,042.45
12	PRAYAGRAJ POWER	9,697.42	1.32	1,279.85	2.59	2,512.38	3.91	3,792.24
13	R.K.M.POWER	2,588.71	2.24	580.98	2.09	541.13	4.33	1,122.11
14	ROSA-1&2	5,680.75	2.32	1,315.91	3.69	2,097.37	6.01	3,413.27
15	SASAN	3,587.16	0.16	56.84	1.28	458.83	1.44	515.66
16	TRN ENERGY (PTC)	1,993.22	1.49	296.62	1.88	374.57	3.37	671.19
17	Ghatampur	7,884.82	3.74	2,952.76	2.78	2,194.00	6.53	5,146.76
	Sub-Total	55,701.93	2.79	15,515.44	2.67	14,870.63	5.46	30,386.08
	Total	1,27,862.15	2.39	30,594.76	2.41	30,847.78	4.81	61,442.54
B	Medium term Sources							

SN	Source of Power (Station wise)	FY 2024-25						
		Units despatched after MOD (MU)	Annual Fixed Charges		Annual Energy/ Variable Charge		Total Cost	
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)
C	Short term Sources	4,972.00	-	-	7.31	3,635.76	7.31	3,635.76
	Station/Source 1							
D	Cogen/ Captive							
	Baggasse/Cogen/ CPP 1	3,934.14	1.16	455.72	3.68	1,447.55	4.84	1,903.27
	Baggasse/Cogen/ CPP 2	-	-	-	-	-	-	-
	Sub-Total	3,934.14	1.16	455.72	3.68	1,447.55	4.84	1,903.27
E	Bilateral & Others (Power purchased through Trading)							
1	Solar (Existing)	4,523.50	-	-	3.82	1,726.16	3.82	1,726.16
2	Solar (FY 21)	-	-	-	-	-	-	-
3	Solar (FY 22)	-	-	-	-	-	-	-
4	Solar (FY 23)	306.63	-	-	3.00	91.99	3.00	91.99
5	Solar (FY 24)	253.05	-	-	3.00	75.91	3.00	75.91
	Sub-Total	5,083.18	-	-	3.73	1,894.06	3.73	1,894.06
		-	-	-	-	-	-	-
G	Non-Solar (Renewable)	-	-	-	-	-	-	-
1	WIND (Existing)	3,411.61	-	-	2.98	1,016.21	2.98	1,016.21
2	WIND (FY 21)							
3	WIND (FY 22)	-	-	-	-	-	-	-
4	WIND (FY 23)	793.76	-	-	2.98	236.43	2.98	236.43
5	WIND (FY 24)	1,509.36	-	-	2.98	449.59	2.98	449.59
6	Biomass Existing	146.73	-	-	6.29	92.32	6.29	92.32
7	Biomass FY 20	-	-	-	-	-	-	-
8	MSW FY 21	13.14	-	-	7.61	10.00	7.61	10.00
	Sub-Total	5,874.60	-	-	3.07	1,804.55	3.07	1,804.55

SN	Source of Power (Station wise)	FY 2024-25						
		Units despatched after MOD (MU)	Annual Fixed Charges		Annual Energy/ Variable Charge		Total Cost	
			(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)	(Rs. / kWh)	(Rs. Cr.)
	Others							
1	Slop Based Power Project	175.45	-	-	1.44	25.34	1.44	25.34
		-	-	-	-	-	-	-
H	NVVN + NSM (Thermal)	-	-	-	-	-	-	-
I	Short Term Sources	-	-	-	-	-	-	-
J	REC	-	-	-	-	-	-	-
K	Banking	-	-	-	-	-	-	-
L	PGCIL Charges	-	-	5,666.59	-	-	-	5,666.59
M	WUPPTCL Charges	-	-	849.64	-	-	-	849.64
N	SEUPPTCL Charges	-	-	263.54	-	-	-	263.54
O	Reactive Energy Charges	-	-	-	-	-	-	-
P	Case-I Transmission Charges	-	-	-	-	-	-	-
Q	STU Charges	-	-	-	-	-	-	-
	Any Other Charges	-	-	-	-	-	-	-
	Less	-	-	-	-	-	-	-
	Late Payment Surcharge	-	-	-	-	-	-	-
	Grand Total	1,47,901.51	2.56	37,830.26	2.68	39,655.04	5.24	77,485.30

Differential Bulk Supply Tariff (DBST)

4.4.16. The Petitioner has worked out the power purchase cost for FY 2024-25 based on the above Differential Bulk Supply Tariff (DBST).

4.4.17. Computation of DBST as per the Commission approved methodology is shown in the below:

TABLE 4-10 COMPUTATION OF DBST FOR FY 2024-25

S.No	Particulars	Formulae	DVVNL	PVVNL	PuVVNL	MVVNL	KESCO	TOTAL	
1	Revenue from Tariff including subsidy (Rs Cr)	A	18,059.55	27,868.51	21,387.65	19,932.93	3,332.99	90,581.62	
2	Energy Sales (MU)	B	25,065.07	38,187.98	29,170.98	26,112.43	4,217.75	1,22,754.21	
3									
A1	Power Procurement Cost – Allocated and Unallocated PPAs (Rs Cr)							71819.16	
A2	Inter State Transmission Charges (Rs Cr)							5666.59	
A1+A2	Total Power Procurement Cost excluding intra state Transmission Charges (In Rs Cr)	C						77485.75	
4	Power Procurement cost of Allocated PPAs (Rs Cr)	D	2394.46	4608.77	2532.50	2532.50	189.61	12257.85	
5	Total Power Required at Discom Periphery (MU)	E	29213.37	43141.41	33911.86	30434.07	4544.48	141245.19	
6	Power at Discom Periphery from allocated PPAs (MU)	F	5789.13	11782.83	5910.72	5910.72	467.30	29860.70	
7	Other Cost (Intra State Transmission, O&M, Interest, Dep etc.) (Rs. Cr.)	G	5029.95	5342.40	5651.00	5244.43	743.86	22011.64	
8	ABR (Rs/ Unit)	$H=(A/B)*10$	7.21	7.30	7.33	7.63	7.90	7.38	
9	Other Cost (Rs/Unit of Sale)	$I=G*10/B$	2.01	1.40	1.94	2.01	1.76	1.79	
10	Power Purchase Rate		0.00	0.00	0.00	0.00	0.00	0.00	
A	Allocated PPAs per unit of sale (Rs/unit)	$J=D*10/B$	0.96	1.21	0.87	0.97	0.45	1.00	
B	Unallocated PPAs per unit of sale	$K=(C-\text{Total PP at "D"})*10/\text{Total Sale at "B"}$	5.31						
11	Revenue available for unallocated PPAs (Rs./unit of sale)	$L=H-I-J$	4.24	4.69	4.53	4.66	5.69	4.59	
12	Power Purchase Allocation (per unit of sale) "K" in the ratio of available Revenue "L"	M	4.91	5.43	5.24	5.39	6.59	5.31	

S.No	Particulars	Formulae	DVVNL	PVVNL	PuVVNL	MVVNL	KESCO	TOTAL
13	Total Power Purchase cost per unit of sale including allocated PPAs	$N=J+M$	5.87	6.64	6.11	6.36	7.04	6.31
14	Total Power Purchase Cost (Rs Crs)	$O=N*B/10$	14,713.43	25,362.91	17,827.23	16,613.13	2,969.04	77,485.75
	DBST (Rs/Unit)							
15	DBST Computation of Allocated PPAs	P	4.14	3.91	4.28	4.28	4.06	4.11
16	DBST Computation of Unallocated PPAs	$Q=M*B/(E-F)$	5.26	6.62	5.46	5.74	6.82	5.86
17	DBST of total PPAs	$R=O*10/E$	5.04	5.88	5.26	5.46	6.53	5.49

- 4.4.18. The allowable power purchase cost for FY 2024-25 is shown in the table below:

TABLE 4-11 POWER PURCHASE COST FOR FY 2024-25

Particulars	Unit	Projected
Allowable Power Purchase	MU	30434.07
DBST Rate	Rs/kWh	5.46
Allowable Power Purchase Cost	Rs Crore	16613.13

4.5. Intra-State Transmission Charges

- 4.5.1. The proposed Intra State transmission charges have been computed at the Intra-State transmission rate approved by the Hon'ble Commission in the Tariff Order for FY 2024-24 dated 24 May 2023, which is shown in the Table below:

TABLE 4-12 INTRA-STATE TRANSMISSION CHARGES FOR FY 2024-25

Particulars	Unit	Projected
Units Wheeled	MU	30434.07
Transmission Rate (Approved in the UPPTCL Tariff Order for FY 2023-24))	Rs/kWh	0.26410
Transmission Charges	Rs Crore	803.76

4.6. Operation and Maintenance Expenses

- 4.6.1. The Petitioner has discussed the approach for the Operation and Maintenance expenses in detail in the True-up Section for FY 2022-23 above.
- 4.6.2. Therefore, the Petitioner requests the Hon'ble Commission to allow the O&M Expenses by considering the computation of O&M expenses based on the proposed methodology as shown in true-up Sections.

WPI and CPI Escalation Rates

- 4.6.3. Firstly, the Petitioner has calculated the inflation index based on the weighted average index of WPI and CPI. The WPI and CPI index has been considered, as available on the website of Economic Advisor and Ministry of Labour Bureau, Govt. of India, respectively. The summary of WPI & CPI Escalation rate is shown in table below:

TABLE 4-13 INFLATION INDICES

FY	Index		Inflation Rate	
	WPI	CPI	WPI	CPI
FY 2018-19	119.79	299.92	4.28%	5.45%

FY	Index		Inflation Rate	
	WPI	CPI	WPI	CPI
FY 2019-20	121.83	322.50	1.70%	7.53%
FY 2020-21	123.38	338.71	1.27%	5.03%
FY 2021-22	139.41	356.06	13.00%	5.12%
FY 2022-23	152.45	377.62	9.36%	6.05%
FY 2023-24	150.25	387.22	-1.44%	2.54%

Employee Expenses

4.6.4. The Petitioner has projected its Employee Expenses based on the Employee Expenses computed in Section 3. The computation for the same is shown below.

TABLE 4-14 COMPUTATION OF EMPLOYEE EXPENSES FOR FY 2024-25 (IN RS. CR)

Particulars	Claimed in Instant Petition for FY 2023-24	Average CPI Escalation of last 3 years.	Computed (Rs. Cr)
Employee Expenses	947.45	4.57%	990.78

4.6.5. Further, the capitalisation is projected based on same ratio of employee expenses capitalisation and employee expenses for FY 2022-23 (True-up year). Accordingly, Employee Expenses and its capitalisation determined for FY 2024-25 is shown in table below:

TABLE 4-15 EMPLOYEE EXPENSES FOR FY 2024-25 (IN RS. CR)

Sl No.	Particular	Projected
A	Gross Employee Expenses after escalation	990.78
B	Less: Employee Expenses capitalized	197.57
C	Net Employee Expenses	793.21

Repair & Maintenance Expenses (R&M Expenses)

4.6.6. The Petitioner has projected its R&M Expenses based on R&M Expenses claimed in Section 3. The computation for R&M Expenses for FY 2024-25 is shown below.

TABLE 4-16 COMPUTATION OF R&M EXPENSES FOR FY 2024-25 (IN RS. CR)

Particulars	Claimed in Instant Petition for FY 2023-24	Average WPI Escalation of last 3 years.	Computed (Rs. Cr)
R&M Expenses	440.10	6.97%	470.78

- 4.6.7. Accordingly, Net R&M Expenses determined for FY 2024-25 is shown in table below:

TABLE 4-17 R&M EXPENSES FOR FY 2024-25 (IN RS. CR)

S. No.	Particulars	Projected
1	Gross R&M Expenses after escalation	470.78
2	Less: R&M Expenses capitalized	-
3	Net R&M Expenses	470.78

Administrative & General Expenses (A&G)

- 4.6.8. The Petitioner has projected its A&G Expenses based on A&G Expenses claimed in Section 3. The computation for A&G Expenses for FY 2024-25 is shown below.

TABLE 4-18 COMPUTED A&G EXPENSES FOR FY 2024-25 (IN RS. CR)

Particulars	Claimed in Instant Petition for FY 2023-24	Average WPI Escalation of last 3 years.	Computed (Rs. Cr)
A&G Expenses	1,019.57	6.97%	1,090.62

- 4.6.9. Accordingly, Net A&G Expenses determined for FY 2023-24 is shown in table below:

TABLE 4-19 NET A&G EXPENSES FOR FY 2024-25 (IN RS. CR)

S.No.	Particulars	Projected
1	Gross A&G Expenses after escalation	1,090.62
2	Less: A&G expenses capitalized	-
3	Net A&G expenses	1,090.62

Additional O&M for Smart metering OPEX

- 4.6.10. Ministry of Power (Government of India) vide their letter dated 08.09.2016 wrote to Forum of Regulators (FOR) about the strategy for roll out of advance metering infrastructure in the States sighting Clause No. 8.4 of the revised National Tariff Policy issued on January 28, 2016 regarding installation and provision of smart meters. Central Electricity Authority (CEA) also reiterated the said clause of revised National Tariff Policy and intimated the Power Secretaries of all the States including State of Uttar Pradesh about technical specification of smart meters. The CEA also asked the States to prepare a detailed plan for installation of smart meters and submit the same to respective State Regulatory Commissions for approval.
- 4.6.11. The Hon'ble Commission vide its letter dated 16.05.2018 directed UPPCL to submit the detailed roll out plan of installation of smart

meters for the State Discoms of Uttar Pradesh for the approval of the Hon'ble Commission.

4.6.12. In response to the directions of the Hon'ble Commission and letter received from CEA, UPPCL vide its letter dated 06.08.2018 submitted the smart meter roll out plan for the State Discoms under "Opex Model". Under "Opex Model", State Discoms are required to pay monthly fee (arrived at through competitive bidding process conducted by EESL) for each meter reading through Smart Meter to Energy Efficiency Services Limited (EESL), a Government of India company and there is no additional burden of depreciation, interest and return on equity on the consumer towards the cost of Smart Meter. A presentation in this regard was also made at UPERC on 11.09.2018 to address the queries raised by the Hon'ble Commission.

4.6.13. The Hon'ble Commission vide Order dated 15.11.2018 approved the Smart Meter rollout plan for State Discoms of Uttar Pradesh. The operative part of the Hon'ble Commission's Order is reproduced as under:

"Since installation of Smart Meters is a national programme and has produced very encouraging financial returns in private Discoms, the Commission approves the proposed roll out plan of UPPCL and Discoms submitted before the Commission....."

4.6.14. Following is mentioned in the Hon'ble Commissions Order dtd. 15.11.2018 at Sl. No. 5 of reply of UPPCL.

"DISCOM will pay EESL on OPEX basis as O&M expenditure. The assets will be in the books of EESL till the transfer of assets at the end of project at zero value."

4.6.15. Further, the Hon'ble Commission in its Tariff Order FY 2019-20 dtd. 03.09.2019 at Clause No. 6.18.7 has mentioned this expenditure under the head of A&G expenses as below:

"6.18.7 It may kindly be noted that this type of expenses were not envisaged during projection of MYT O&M norms for FY 2017-18 to FY 2019-20. Further, O&M Norms approved by the Hon'ble Commission were based on five year Audited Accounts, which didn't have any O&M expenses towards smart metering. The amount of this additional O&M has been entered as rent in the replies of comments on roll out plan submitted to Hon'ble Commission vide MD, UPPCL letter no. 352/CE(Com-II)/Smart Meter/18 dt. 25.09.2018. Therefore, this expense may be considered under the head of A&G expenses as additional expenses."

4.6.16. The amount sought as 'Additional A&G Expenses for smart metering is payable to EESL to cover cost towards smart meter and box installation, AMI software cost, consumer indexing, training, integration and Commissioning of AMI solution. It may be noted that this cost has been proposed to be recovered under Opex model based on per meter per month basis and there shall be no additional burden of depreciation, interest and return on equity on the consumer.

4.6.17. It is submitted that the Opex to be incurred by the petitioner for implementation of Smart Meter rollout plan is not part of the normative O&M expenses provided to the Licensee under the Multi-Year Tariff Order dated 22.01.2019 and Tariff Regulations 2019 since: -

(a)The same was not envisaged during projection of MYT O&M norms for FY 2017-18 to FY 2019-20 and for the control period 2021-2025.

(b)The normative O&M norms approved by the Hon'ble Commission are based on previous five-year Audited Accounts, which does not include any O&M expenses towards smart metering.

4.6.18. Moreover, the Hon'ble Commission's observation that the smart-meter roll out project is a self-sustaining model since the Opex cost to be paid by the licensees will be compensated by overall reduction in O&M cost due to improved billing and collection efficiency on account of installation of smart meters is debatable since: -

(a) It is an attempt to compensate the present additional O&M expenses on account of smart meters Opex with future probable reduction in O&M cost. It is most respectfully submitted that a court of law is not permitted to pass orders based on conjecture, surmises or the possibility of happening of any event. A court has to pass orders on facts and data available on record. In the present case Ld. UP Commission in its Order dated 15.11.2018 has itself noted that the UP Discoms would incur substantial Opex cost (to be paid to EESL) towards implementation of Smart Metering Rollout Plans. Hence, there is no reason to now disallow the said cost, which is a Statutory expense and has to be mandatorily incurred by the Appellants.

(b) The approach of compensating the Opex cost with likely savings in billing and collection efficiency was not envisaged in the Petition. Further in the petition the Hon'ble Commission was requested to approve the OPEX Cost incurred for this scheme. Moreover, the tariff is already being determined based on 100% collection efficiency, despite the actual percentage being substantially lower. Therefore, even if billing and collection efficiency increases by installation of smart meters, the same will not have any impact on the tariff of the Discoms.

(c) Improvement in the collection efficiency with the implementation of Smart Meters may not be in account of Licensees since the Hon'ble Commission already considers 100% collection efficiency.

(d) Further, as detailed under sub section '4.7. Capital Investment, Capitalisation and Financing' the Petitioner are in the process of Rolling out RDSS scheme in the area of Discoms wherein smart metering implementation is envisaged as a integrated part of this scheme. The scheme is also detailed under the respective section. It is also mentioned here a separate petition before the Hon'ble Commission is already filed for the consideration and approval.

4.6.19. The following table summarises the cost of Smart Meters under Opex Model for the Petitioner for FY 2024-25:

TABLE 4-20 SMART METERING OPEX FOR FY 2024-25

Particulars	Smart Meters installed till March 2024	Rate (Rs. /meter/month including GST @18%)	Projected OPEX (IN RS. CR)
FY 2024-25	349353	113.94	325.23

4.6.20. The Hon'ble Commission is requested to approve the smart metering OPEX estimated in the above Table.

4.6.21. Based on the above submission, the summary of the Operation & Maintenance expenses (O&M) projected for FY 2024-25 are shown in the table below:

TABLE 4-21 OPERATION & MAINTENANCE EXPENSES PROJECTED FOR FY 2024-25 (IN RS. CR)

Particulars	Projected
Repair & Maintenance expenses	470.78
Employee expenses	990.78
Administrative and General expenses	1,090.62
Gross O&M Expenses	2,552.18
Less:	-
Employee expenses capitalized	197.57
Administrative and General expenses capitalized	-
Gross expenses Capitalized	197.57
Smart Meter Opex	325.23
Net O&M Expenses	2,679.84

4.7. Capital Investment, Capitalisation and Financing

4.7.1. Implementation of Revamped Distribution Sector Scheme in Uttar Pradesh:

The Central Government has approved the Revamped Distribution Sector Scheme, a Reforms-based and Results-linked Scheme with a five-year budget of Rs. 3,03,758 Crore, to improve the quality, reliability, and affordability of power supply to consumers through a financially sustainable and operationally efficient distribution sector. The key objective of the Scheme is to reduce AT&C Losses to 12-15 percent across India, and the ACS-ARR gap to zero, by increasing operational efficiencies and financial sustainability of all DISCOMs/Power Departments, excluding private sector DISCOMs.

The Scheme is specifically for modernization and loss reduction using proper utilization of funds for works on Pre-Paid Smart Metering, System Metering and

Distribution Infrastructure. Many steps have also been taken for automation and use of Information Technology (IT) in the Distribution Sector under IPDS and R-APDRP which includes the establishment of Data Centres, GIS mapping of consumers, Asset Mapping, Online energy auditing & accounting, Consumer care centers, AMI meters on feeders & Distribution Transformers, provision of Smart Metering to reduce losses etc. in urban areas.

The Revamped Reforms-based and Results-linked, Distribution Sector Scheme seeks to improve the operational efficiencies and financial sustainability, by providing financial assistance to DISCOMs for strengthening of supply infrastructure based on meeting pre-qualifying criteria and achieving basic minimum benchmarks in reforms.

The Revamped Distribution Sector Scheme is covered under two parts namely as Part-A covers metering & distribution infrastructure works and Part-B covers training & capacity building and other enabling & supporting activities.

Part A – Metering & Distribution Infrastructure Works:

- Facilitating in installing prepaid smart meters for all consumers along with associated AMI, communicable meters for DTs & Feeders, ICT including Artificial Intelligence (AI), Machine Learning (ML), etc. based solutions for power Sector and a unified billing and collection system;
- Distribution infrastructure works as required for strengthening and modernizing the system as well as measures for loss reduction. The infrastructure strengthening works will include separation of Agriculture feeders to enable implementation of the KUSUM scheme, Aerial Bunch cables and HVDS for loss reduction, replacement of HT/LT lines as required, construction of new/ upgradation of substations, SCADA and DMS system etc. Each DISCOM/ State will draw up the scheme according to its requirement with the end objective of reducing losses and ensuring 24 x 7 supply.

Part B - Training & Capacity Building and other Enabling & Supporting Activities:

Supporting and enabling components, such as Nodal Agency Fee, enabling components of MoP (communication plan, publicity, consumer awareness, consumer survey and other associated measures such as third party evaluation etc.), up-gradation of Smart Grid Knowledge Centre, training and capacity building, awards and recognitions etc.

The proposal of UP States based on present scenarios are as following:-

1. ACS-ARR gap with revenue on an accrual basis to be zero at the end of FY 2024 -25.
2. AT&C Loss target to be in line with the trajectory proposed.
3. DPRs to be rationalized keeping in view that the proposed works for loss reduction are targeted in high loss areas in order of priorities.

4. Liquidation of outstanding subsidy to be ensured as per scheme guidelines.
5. Consumer, DTR, and Feeder Smart Metering timelines to be as per scheme guidelines

As per the action plan the Discoms has considered the capital expenditure to be incurred (net of Grants) for FY 2024-25 towards the Loss Reduction and Modernization works. The expanses regarding Smart meter have been claimed under Opex mode as per the existing monthly rate discovered. The actual rate when discovered under the current tendering process same shall be informed to the Hon'ble Commission.

- 4.7.2. Regulation 44 of UPERC (Multi Year Tariff for Distribution & Transmission) Regulations, 2019 provides for consideration of capital expenditure for the purpose of determination of ARR for the Control Period. Accordingly, the Petitioner has projected the capital expenditure to be undertaken in FY 2024-25 in this Petition. The details of proposed Capital Expenditure for FY 2024-25 is depicted in the table below:

TABLE 4-22 PROPOSED CAPITAL EXPENDITURE DETAILS FOR FY 2024-25 (IN RS. CR)

Particulars	Investments	Capitalisation
OTHER SCHEMES (Net of Consumer Contribution and Grant)		981.23
REVAMPED SCHEME (RDSS)	1,305.99	522.39
Total excluding Interest and employee capitalization (A)	1,305.99	1503.62
Add: Employee Capitalization (B)	-	140.57
Add: Interest Capitalization (C)	-	-
Total (D= A+B+C)	1,305.99	1,644.19

- 4.7.3. It is pertinent to highlight that the Investment considered for FY 2023-24 is the net investments (excluding grants and consumer contributions). The Petitioner has separately provided the amount of consumer contribution and grant for FY 2024-25 in relevant section of this Petition and in tariff formats as well.
- 4.7.4. Based on the methodology adopted by the Hon'ble Commission, 40% of the investments made during FY 2023-24 is capitalized in the same year. The Petitioner has also considered employee expense capitalization and Interest capitalization during FY 2024-25 as per the methodology adopted by the Hon'ble Commission. Considering the Capital Work in Progress (CWIP), investment during the year and capitalisations, the Petitioner has computed the closing CWIP for FY 2024-25.
- 4.7.5. Considering the aforementioned submissions, the capitalisation and capital work in progress for FY 2023-24 are shown in the Table below:

TABLE 4-23 CAPITALIZATION AND WIP OF INVESTMENT FOR FY 2024-25 (IN RS. CR)

Particulars	Derivation	Projected
Opening WIP as on 1 st April 2023	A	2,453.07
Investments	B	1,108.41
Employee Expenses capitalization	C	197.57
A&G Expenses Capitalisation	D	-
Interest Capitalisation on Interest on long term loans	E	-
Total Investments	F= A+B+C+D+E	3,759.05
Transferred to GFA (Total Capitalisation)	G	1,644.19
Closing WIP	H=F-G	2,114.86

Notes: Opening Balances for FY 2024-25 are as per closing balances of FY 2023-24.

4.7.6. The Petitioner has considered a normative debt: equity ratio of 70:30. Considering this approach, 70% of the capitalisation (excluding consumer contribution and grants) undertaken in FY 2024-25 has been considered to be financed through loan and balance 30% has been considered to be financed through equity contributions. The portion of capital expenditure financed through consumer contribution, capital subsidies and grants has been separated as the depreciation and interest thereon would not be charged to the beneficiaries.

4.7.7. The table below summarizes the amounts considered towards consumer contributions, capital grants and subsidies for FY 2023-24:

TABLE 4-24 CONSUMER CONTRIBUTION, CAPITAL GRANTS & SUBSIDIES FOR FY 2024-25 (IN RS. CR)

Particulars	Projected
Opening Balance of Consumer Contributions, Grants and Subsidies towards Cost of Capital Assets	2,302.92
Additions during the year includes consumer contribution and grants	-
Closing Balance	2,302.92

4.7.8. Thus, the Petitioner submits that the capital investments proposed during FY 2024-25 after netting off the capital investment through deposit works, has been considered to be funded through debt and equity of 70:30, as depicted in the table below:

TABLE 4-25 FINANCING OF THE CAPITAL INVESTMENT FOR FY 2024-25 (IN RS. CR)

Particulars	Derivation	Projected
Investment / Capitalisation (Asset put to use) net of CCG	A	1,644.19
Less:		
Consumer Contribution and grants	B	-
Investment funded by debt and equity	C=A-B	1,644.19
Debt Funded	70% of C	1,150.93

Particulars	Derivation	Projected
Equity Funded	30% of C	493.26

4.8. Interest & Finance Charges

➤ Interest on Long Term Loan

- 4.8.1. The Hon'ble Commission in its previous Tariff and True-Up orders had considered a normative tariff approach with a debt equity ratio of 70:30. Considering this approach, 70% of the capital expenditure (asset put to use) undertaken in any year was financed through loan and balance 30% has been financed through equity contributions. The portion of capital expenditure financed through consumer contributions, capital subsidies and grants are separated and the depreciation, interest and return on equity thereon was not charged to the consumers. Subsequently, the financing of the capital investment was worked out based on the debt equity ratio of 70:30 and allowable depreciation was considered as normative loan repayment.
- 4.8.2. The Petitioner has worked-out the interest on long term loan based on the same philosophy.
- 4.8.3. Allowable depreciation for the year has been considered as normative loan repayment. The weighted average interest rate for FY 2024-25 has been considered as per audited accounts for computing the eligible interest expenses.
- 4.8.4. Considering the above, the gross interest on long term loan has been computed below. The interest capitalisation has been considered at the same rate as for FY 2024-25. The computations for interest on long term loan are shown in table below:

TABLE 4-26 INTEREST ON LONG TERM LOAN FOR FY 2024-25 (IN RS. CR)

Particulars	Projected
Opening Loan	4,560.86
Loan Additions (70% of Investments)	1,150.93
Less: Repayments (Depreciation allowable for the year)	622.18
Closing Loan Balance	5,089.61
Weighted Average Rate of Interest	10.91%
Interest on long term loan	526.43
Less: Interest Capitalized	0.00
Net Interest on Loan term loan	526.43

➤ Interest on Consumer Security Deposits

- 4.8.5. The opening balance of long term loan has been considered equivalent to the closing loan balance for previous year as per the present Petition.

- 4.8.6. As per Regulation 25.2 (c) of UPERC (Multi Year Tariff for Distribution & Transmission) Regulations, 2019, Interest shall be allowed on consumer security deposits as per the provisions of the Electricity Supply Code, 2005 and its subsequent amendments/ addendums and the new Regulations made after repeal of the same.
- 4.8.7. The opening balances of security deposits have been considered as per closing figures of FY 2023-24 and additions during the year FY 2024-25 is estimated as per the % increase in Revenue Assessment for FY 2024-25 w.r.t FY 2023-24. Accordingly, the Petitioner has computed the interest on Security deposit for FY 2024-25, which is shown in the Table below.

TABLE 4-27 INTEREST ON SECURITY DEPOSIT FOR FY 2024-25 (IN RS. CR)

Particulars	Projection
Closing Balance for Security Deposit	927.88
Rate of Interest (RBI bank Rate as on 01.04.2022)	6.50%
Interest on Security Deposits	57.93

➤ **Interest on Working Capital**

- 4.8.8. As regards determination of Interest on Working Capital for FY 2024-25 as per Regulation 25.2 (a) & 25.2 (b) of UPERC (Multi Year Tariff for Distribution & Transmission) Regulations, 2019. The Regulation 25.2 (a) & 25.2 (b) is quoted below:

“(a)The working capital requirement of the Distribution Business shall cover:

- (v) Operation and maintenance expenses for one month;*
- (vi) Maintenance spares at 40% of the R&M expenses for two months; and*
- (vii) One and half month equivalent of the expected revenue from charges for use of Distribution system at the prevailing Tariff (excluding Electricity Duty);*

minus

- (viii) Amount held as security deposits from Distribution System Users:*

Provided that for the purpose of Truing-Up for any year, the working capital requirement shall be re-computed on the basis of the values of components of working capital approved by the Commission in the Truing- Up;

(b) Rate of interest on working capital shall be simple interest and shall be equal to the SBI MCLR (1 Year) on October 01, 2019 plus 250 basis points:

Provided that for the purpose of Truing-Up for any year, simple interest on working capital shall be allowed at a rate equal to the weighted average SBI MCLR (1 Year) prevailing during the concerned Year plus 250 basis points.”

- 4.8.9. The Petitioner has considered the rate of interest on working capital as per prevailing rate
- 4.8.10. on 1st October 2023, as per the Commissions consideration and approval vide its order dated 24.5.2023. In the said order the Commission is of the view that the rate of interest on working capital requirement is to be taken at the prevailing rate as on 1st October preceding to the date of filing as provided in the Regulations 4.1 of MYT Regulations, 2019. Based on above the interest on working capital for FY 2024-25 is calculated in table as below:

TABLE 4-28 INTEREST ON WORKING CAPITAL FOR FY 2024-25 (IN RS. CR)

Particulars	Projected
O&M expenses for 1 month	196.22
One and Half month Month equivalent of expected revenue	2,491.62
Maintenance spares @ 40% of R&M expenses for two months	31.39
Less: Security deposits from consumers, if any	927.88
Total Working Capital Requirement	1,791.33
State Bank Advance Rate (SBAR) %	11.05%
Interest on Working Capital	197.94

- 4.8.11. The following table summarises the Interest and Finance charges projected by the Petitioner for FY 2024-25.

TABLE 4-29 INTEREST AND FINANCE CHARGES FOR FY 2024-25 (IN RS. CR)

Particulars	Projected
A: Interest on Long Term Loans	
Gross Interest on Long Term Loan	526.43
Less: Interest Capitalisation	-
Net Interest on Long Term Loans	526.43
B: Finance and Other Charges	-
Interest on Consumer Security Deposits	57.93
Bank/ Finance Charges	34.49
Total Finance Charges	92.42
C: Interest on Working Capital	197.94
Total (A+B+C)	816.79

4.9. Depreciation

- 4.9.1. The basis of determination of depreciation is stated in Regulation 21.1 of UPERC (Multi Year Tariff for Distribution & Transmission) Regulations, 2019. The Regulation 21.1 is quoted below:

“21.1 The Licensee, shall be permitted to recover Depreciation on the value of fixed assets used in their respective businesses, computed in the following manner:

(a) The approved original cost of the fixed assets shall be the value base for calculation of Depreciation:

Provided that the Depreciation shall be allowed on the entire capitalised amount of the new assets after reducing the approved original cost of the retired or replaced or de-capitalised assets.

(b) Depreciation shall be computed annually based on the Straight- Line Method at the rates stipulated in the Annexure- A to these Regulations.

Provided that the Licensee shall ensure that once the individual asset is depreciated to the extent of seventy percent, remaining depreciable value as on 31st March of the year closing shall be spread over the balance Useful Life of the asset including the Extended Life, as per submission of the Licensee and approved by the Commission.

(c) The salvage value of the asset shall be considered at 10% of the allowable capital cost and Depreciation shall be allowed up to a maximum of 90% of the allowable capital cost of the asset:

Provided that land owned shall not be treated as a Depreciable asset and shall be excluded while computing Depreciation

Provided further that Depreciation shall be chargeable from the first year of commercial operation.

(d) Depreciation shall not be allowed on assets funded by Consumer Contributions or Subsidies/ Grants/ Deposit works.”

- 4.9.2. The Petitioner has computed the allowable depreciation expense on the GFA base for FY 2024-25 as per the SLM approach and at the rates approved by the Hon'ble Commission in UPERC (Multi Year Tariff for Distribution & Transmission), 2019. The Petitioner has computed the depreciation only on the depreciable asset base and has excluded the non-depreciable assets such as land, land rights, etc. The addition during the year is considered as net additions excluding Consumer Contribution and Grant.

4.9.3. Accordingly, the Petitioner has computed depreciation for FY 2024-25 as shown in table below:

TABLE 4-30 GROSS ALLOWABLE DEPRECIATION FOR FY 2024-25 (IN RS. CR) PART A

GROSS ALLOWABLE DEPRECIATION FOR ASSETS BEFORE 01.04.2020 OF MVNL FOR FY 2024-25 (IN RS. CR) PART A								
SN	Particulars	Opening GFA (as on 31.03.2024)	Cumulative Depreciation	Deductio n to GFA	Closing GFA	Average GFA	Depreciati on Rate	Allowable Gross Depreciation
1	Land & Land Rights	1.07	-	-	1.07	1.07	-	-
2	Buildings	182.32	-	-	182.32	182.32	0.03	6.09
3	Other Civil Works	14.27	-	-	14.27	14.27	0.03	0.48
4	Plant & Machinery	-554.13	-	-	-554.13	-554.13	0.05	-29.26
5	Lines, Cables, Network etc.	3,875.25	-	-	3,875.25	3,875.25	0.05	204.61
6	Vehicles	5.55	-	-	5.55	5.55	0.06	0.35
7	Furniture & Fixtures	9.59	-	-	9.59	9.59	0.06	0.61
8	Office Equipments	76.48	-	-	76.48	76.48	0.06	4.84
9	Capital Expenditure on Assets not belonging to utility	-	-	-	-	-	-	-
10	Total Fixed Assets	3,610.40	-	-	3,610.40	3,610.40	0.05	187.72
11	Non depreciable assets (Land & Land Rights)	-	-	-	-	-	-	-
12	Depreciable assets	3,610.40	-	-	3,610.40	3,610.40	0.05	187.72

TABLE 4-31 GROSS ALLOWABLE DEPRECIATION FOR FY 2024-25 (IN RS. CR) PART B

GROSS ALLOWABLE DEPRECIATION FOR ASSETS AFTER ON 01.04.2020 OF MVVNL FOR FY 2024-25 (IN RS. CR) PART B									
SN	Particulars	Opening GFA (as on 01.04.2024)	Addition to GFA	Deduction of Grants	Deduction to GFA	Closing GFA	Average GFA	Depreciation Rate	Allowable Gross Depreciation
1	Land & Land Rights	0.31	0.58			0.89	0.60	0.00	0.00
2	Buildings	117.19	98.49			215.68	166.43	0.03	5.56
3	Other Civil Works	4.16	7.71			11.87	8.01	0.03	0.27
4	Plant & Machinery	2,712.01	-299.33			2,412.68	2,562.35	0.05	135.29
5	Lines, Cables, Network etc.	5,715.84	2,093.33			7,809.17	6,762.50	0.05	357.06
6	Vehicles	2.15	3.00			5.15	3.65	0.06	0.23
7	Furniture & Fixtures	4.47	5.18			9.65	7.06	0.06	0.45
8	Office Equipments	59.02	41.31			100.33	79.68	0.06	5.04
9	Capital Expenditure on Assets not belonging to utility	-	-			0.00	0.00	0.00	0.00
10	Total Fixed Assets	9,124.07	1,950.27			11,074.34	10,099.20	0.05	503.90
11	Non depreciable assets (Land & Land Rights)	-	-			0.00	0.00	0.00	0.00
12	Depreciable assets	9,124.07	1,950.27			11,074.34	10,099.20	0.05	503.90

4.9.4. The Petitioner has reduced the equivalent depreciation on the assets created out of consumer contributions, capital grants and subsidies from the gross allowable depreciation for FY 2024-25.

4.9.5. Thus, the allowable depreciation for FY 2024-25 is shown in the table below:

TABLE 4-32 NET ALLOWABLE DEPRECIATION FOR FY 2024-25 (IN RS. CR)

Particulars	Projected
Gross Allowable Depreciation	785.07
Less: Equivalent amount of depreciation on assets acquired out of the Consumer Contribution and Grant	162.89
Net Allowable Depreciation	622.18

4.10. Provision for Bad and Doubtful Debts

4.10.1. The Petitioner has determined bad & doubtful debt as per Regulation 46 of UPERC (Multi Year Tariff for Distribution & Transmission) Regulations, 2019. The Regulation 46 is quoted below:

“For any Year, the Commission may allow a provision for write off of bad and doubtful debts up to 2% of the amount shown as Revenue Receivables from sale of electricity in the audited accounts of the Distribution Licensee for that Year or the actual write off of bad debts, whichever is less....”

4.10.2. Accordingly, Petitioner has computed provision for bad and doubtful debts at 2% of the revenue receivables.

TABLE 4-33 ALLOWABLE PROVISION FOR BAD AND DOUBTFUL DEBTS FOR FY 2024-25 (IN RS. CR)

Particulars	Projected
Total Revenue Receivables from Retail Sales	16,092.90
% of Provision for Bad and Doubtful Debts	2%
Bad and Doubtful Debts as per Regulation	321.86
Bad Debt Projected	321.86

4.11. Return on Equity

4.11.1. The Regulation 22 of the MYT (Distribution and Transmission) Regulations, 2019 provides for return on equity @15% post-tax per annum for Distribution Licensee as specified below:

“22 Return on equity

22.1 Return on equity shall be computed in Rs. terms on equity base at the rate of 14.5% post-tax per annum for the Transmission Licensee and at the rate of 15% post-tax per annum for Distribution Licensee respectively as determined in accordance with Regulation 20:

Provided that assets funded by Consumer Contribution / Deposit works, Capital Subsidies / Grants and corresponding Depreciation shall not form part of the Capital Cost. Actual Equity infused by the Licensee as per book value shall be considered and shall be used for computation in these Regulations.”

- 4.11.2. The Petitioner has considered closing equity of FY 2023-24 as opening for FY 2024-25. Equity addition during the year has been considered 30% of Capitalisation during the year net of consumer contribution, capital subsidies/ grants.
- 4.11.3. The Return on Equity (RoE) for FY 2024-25 is shown below:

TABLE 4-34 RETURN ON EQUITY (ROE) FOR FY 2024-25 (IN RS. CR)

Particulars	Revised Estimate
Opening Equity	4,167.31
Net additions during the year (30% of Asset put to use)*	493.26
Equity (Closing Balance)	4,660.57
Rate of Return on Equity (%)	15%
Allowable Return on Equity	662.09

* Net of Grants and consumer contribution

4.12. Revenue from Sale of Power

- 4.12.1. For projecting the Fixed Charges for FY 2024-25, the average load of March 2024 and March 2025 has been considered.
- 4.12.2. It is submitted that for HV category consumers, the Petitioner has considered the billable load/Demand at 75% of the contracted load/demand considering it to be as maximum load/demand.
- 4.12.3. Category-wise revenue worked-out based on above assumption and projected billing determinants are shown in the Tables below:

TABLE 4-35 CATEGORY-WISE REVENUE AND ABR FOR FY 2024-25 (IN RS. CR) AT EXISTING TARIFF

Consumer Category/ Sub-Category	Projected Sales (MU)	Fixed Charges	Variable Charges	Estimated Revenue (Rs Cr)
LMV-1: Domestic Light, Fan & Power				
Life Line Consumers (both Rural and Urban) (up to 100 kWh/month)	4395.35	314.15	1318.61	1632.76
Dom: Rural Schedule (unmetered)	0.82	0.29	0.00	0.29
Dom: Rural Schedule (metered) other than BPL	4191.02	186.77	1714.73	1901.50
0-100 kWh/month	1693.38	101.60	567.28	668.89
101-150 kWh/month	1159.10	37.35	446.25	483.61
151-300 kWh/month	700.07	28.02	350.03	378.05
Above 300 kWh/Month (Starting from 301 units)	638.48	19.80	351.16	370.96
Dom: Supply at Single Point for Bulk Load	58.00	3.07	40.60	43.67
Other Metered Domestic Consumers other than BPL	6405.72	536.45	3750.02	4286.47

Consumer Category/ Sub-Category	Projected Sales (MU)	Fixed Charges	Variable Charges	Estimated Revenue (Rs Cr)
0-100 kWh/month	2229.79	252.13	1226.39	1478.52
101-150 kWh/month	1289.00	107.29	708.95	816.24
151-300 kWh/month	1236.40	75.10	741.84	816.94
Above 300 kWh/Month (Starting from 301 units)	1650.52	101.93	1072.84	1174.76
Sub Total	15050.91	1040.73	6823.95	7864.68
LMV-2: Non Domestic Light, Fan & Power				
Non Dom: Rural Schedule (metered)	503.10	45.46	276.71	322.17
Non Dom: Other Metered Non-Domestic Supply	1624.69	556.06	1270.59	1826.65
Load upto 4 kW	1234.76	377.94	963.35	1341.29
Upto 300 kWh / month	820.53	306.87	615.40	922.27
Above 300 kWh/Month	414.23	71.06	347.95	419.01
Above 4 kW	389.92	178.12	307.24	485.36
Upto 1000 kWh / month	271.53	170.99	203.64	374.64
Above 1000 kWh/Month	118.40	7.12	103.60	110.72
Sub Total	2127.79	601.52	1547.30	2148.82
LMV-3: Public Lamps				
Unmetered	15.23	25.74	0.00	25.74
Unmetered - Gram Panchayat	2.33	2.61	0.00	25.74
Unmetered - Nagar Palika & Nagar Panchayat	11.03	17.37	0.00	2.61
Unmetered - Nagar Nigam	1.87	5.76	0.00	17.37
Metered	309.74	20.64	258.02	278.66
Metered - Gram Panchayat	9.44	0.63	7.08	7.71
18:00 hrs - 06:00 hrs	9.44	0.63	7.08	7.71
06:00 hrs - 18:00 hrs	0.00	0.00	0.00	0.00
Metered - Nagar Palika & Nagar Panchayat	86.23	4.92	68.99	73.91
18:00 hrs - 06:00 hrs	86.23	4.92	68.99	73.91
06:00 hrs - 18:00 hrs	0.00	0.00	0.00	0.00
Metered - Nagar Nigam	214.06	15.09	181.95	197.05
18:00 hrs - 06:00 hrs	214.06	15.09	181.95	197.05
06:00 hrs - 18:00 hrs	0.00	0.00	0.00	0.00
Sub Total	324.97	46.38	258.02	304.40
LMV-4: Light, fan & Power for Institutions				
Inst: Public	275.48	55.57	227.27	282.85
Inst: Private	63.71	18.80	57.34	76.14
Sub Total	339.20	74.37	284.62	358.99
LMV-5: Private Tube Wells/ Pumping Sets				
Consumers getting supply as per "Rural Schedule"	2729.62	173.23	544.27	717.50
PTW: Rural Schedule (unmetered) (Total)	8.25	1.34	0.00	1.34
PTW: Rural Schedule (unmetered)	8.25	1.34	0.00	1.34
PTW: Rural Schedule (metered) (Total)	2721.37	171.88	544.27	716.16
PTW: Rural Schedule (metered)	2721.37	171.88	544.27	716.16
PTW: Rural Schedule (Energy Efficient Pumps) (metered)	0.00	0.00	0.00	0.00

Consumer Category/ Sub-Category	Projected Sales (MU)	Fixed Charges	Variable Charges	Estimated Revenue (Rs Cr)
Consumers getting supply as per "Urban Schedule (Metered Supply)"	45.30	7.87	27.18	35.05
PTW: Urban Schedule (metered)	45.30	7.87	27.18	35.05
Sub Total	2774.92	181.10	571.45	752.55
LMV 6: Small and Medium Power upto 100 HP (75 kW)				
Consumers getting supply as per "Rural Schedule"	166.85	28.03	112.66	140.69
Up to 20 kW	135.03	21.95	91.18	113.13
Above 20 kW	31.82	6.07	21.49	27.56
Consumers getting supply other than "Rural Schedule"	437.40	66.07	320.32	386.39
Summer Months (April to September)	218.70	33.03	160.77	193.80
For load upto 20 kW	142.16	23.12	104.50	127.62
05:00 hrs to 11:00 hrs	22.98	3.74	14.26	18.00
11:00 hrs to 17:00 hrs	59.41	9.66	43.37	53.03
17:00 hrs to 23:00 hrs	29.59	4.81	24.84	29.66
23:00 hrs to 05:00 hrs	30.18	4.91	22.03	26.94
For load above 20 kW	76.55	9.91	56.27	66.18
05:00 hrs to 11:00 hrs	12.37	1.60	7.68	9.28
11:00 hrs to 17:00 hrs	31.99	4.14	23.35	27.49
17:00 hrs to 23:00 hrs	15.93	2.06	13.38	15.44
23:00 hrs to 05:00 hrs	16.25	2.10	11.86	13.97
Winter Months (October to March)	218.70	33.03	159.55	192.59
For load upto 20 kW	142.16	23.12	103.71	126.83
05:00 hrs to 11:00 hrs	22.98	3.74	16.77	20.51
11:00 hrs to 17:00 hrs	59.41	9.66	43.37	53.03
17:00 hrs to 23:00 hrs	29.59	4.81	24.84	29.66
23:00 hrs to 05:00 hrs	30.18	4.91	18.73	23.63
For load above 20 kW	76.55	9.91	55.84	65.75
05:00 hrs to 11:00 hrs	12.37	1.60	9.03	10.63
11:00 hrs to 17:00 hrs	31.99	4.14	23.35	27.49
17:00 hrs to 23:00 hrs	15.93	2.06	13.38	15.44
23:00 hrs to 05:00 hrs	16.25	2.10	10.08	12.19
Sub Total	604.25	94.09	432.98	527.08
LMV-7: Public Water Works	0.00	0.00	0.00	1.84
Consumers getting supply as per "Rural Schedule"	610.97	5.17	446.64	451.81
Rural Metered	568.06	3.33	446.64	451.81
Rural Unmetered	42.91	1.84	0.00	1.84
Consumers getting supply other than "Rural Schedule"	824.23	5.23	664.04	669.27
Urban Metered	781.22	3.24	664.04	669.27
Urban Unmetered	43.01	1.99	0.00	1.99
Sub Total	610.97	5.17	446.64	451.81
LMV-9: Temporary Supply	0.00	0.00	0.00	0.06
Metered	39.68	9.47	35.39	44.86
Metered TS: Individual residential consumers	3.19	0.78	2.55	3.33

Consumer Category/ Sub-Category	Projected Sales (MU)	Fixed Charges	Variable Charges	Estimated Revenue (Rs Cr)
Metered TS: Others	36.49	8.69	32.84	41.53
Unmetered	0.86	0.06	0.00	0.06
Unmetered TS: Ceremonies	0.00	0.00	0.00	0.06
Unmetered TS: Temp shops	0.86	0.06	0.00	0.00
Sub Total	40.54	9.53	35.39	44.92
LMV-10: Departmental Employees	0.00	0.00	0.00	0.00
LMV-11: Electrical Vehicles	0.00	0.00	0.00	0.00
Multi Story Buildings	0.00	0.00	0.00	0.00
LMV-1b	0.00	0.00	0.00	0.00
HV-1b	0.00	0.00	0.00	0.00
Public Charging Station	8.34	0.00	0.00	0.00
LT	1.87	0.00	6.16	6.16
Summer Months (April to September)	0.94	0.00	1.44	1.44
05:00 hrs to 11:00 hrs	0.15	0.00	0.00	0.00
11:00 hrs to 17:00 hrs	0.39	0.00	0.10	0.10
17:00 hrs to 23:00 hrs	0.19	0.00	0.30	0.30
23:00 hrs to 05:00 hrs	0.20	0.00	0.17	0.17
Winter Months (October to March)	0.94	0.00	0.15	0.15
05:00 hrs to 11:00 hrs	0.15	0.00	0.72	0.72
11:00 hrs to 17:00 hrs	0.39	0.00	0.12	0.12
17:00 hrs to 23:00 hrs	0.19	0.00	0.30	0.30
23:00 hrs to 05:00 hrs	0.20	0.00	0.17	0.17
HT	6.47	0.00	0.13	0.13
Summer Months (April to September)	3.23	0.00	4.72	4.72
05:00 hrs to 11:00 hrs	0.52	0.00	2.38	2.38
11:00 hrs to 17:00 hrs	1.35	0.00	0.32	0.32
17:00 hrs to 23:00 hrs	0.67	0.00	0.99	0.99
23:00 hrs to 05:00 hrs	0.69	0.00	0.57	0.57
Winter Months (October to March)	3.23	0.00	0.50	0.50
05:00 hrs to 11:00 hrs	0.52	0.00	2.36	2.36
11:00 hrs to 17:00 hrs	1.35	0.00	0.38	0.38
17:00 hrs to 23:00 hrs	0.67	0.00	0.99	0.99
23:00 hrs to 05:00 hrs	0.69	0.00	0.57	0.57
Sub Total	8.34	0.00	0.43	0.43
	0.00	0.00	6.16	6.16
HV-1: Non-Industrial Bulk Loads	0.00	0.00	0.00	0.00
Commercial Loads / Private Institutions / Non-Domestic Bulk Power with contracted Load 75 kW & above and getting supply at single point on 11 kV & above voltage level.	545.89	87.29	454.09	541.38
Supply at 11 kV	541.37	86.48	450.42	536.90
Supply above 11 kV	4.52	0.81	3.67	4.48
Public Institutions, Registered Societies, Residential Colonies / Townships, Residential Multi-Storied Buildings including Residential Multi-Storied Buildings with contracted load 75 kW & above and getting supply at Single Point on 11 kV & above	545.89	115.73	420.25	535.98

Consumer Category/ Sub-Category	Projected Sales (MU)	Fixed Charges	Variable Charges	Estimated Revenue (Rs Cr)
voltage levels				
Supply at 11 kV	541.37	114.63	416.86	531.49
Supply above 11 kV	4.52	1.10	3.39	4.49
Sub Total	1091.78	203.02	874.34	1077.36
HV-2: Large and Heavy Power above 100 BHP (75 kW)				
HV2 Urban Schedule: Supply at 11 kV	1419.62	183.12	1005.81	1188.93
Summer Months (April to September)	709.81	91.56	503.10	594.66
05:00 hrs to 11:00 hrs	153.43	19.79	92.60	112.39
11:00 hrs to 17:00 hrs	253.86	32.75	180.24	212.99
17:00 hrs to 23:00 hrs	145.34	18.75	118.67	137.42
23:00 hrs to 05:00 hrs	157.17	20.27	111.59	131.87
Winter Months (October to March)	709.81	91.56	502.70	594.27
05:00 hrs to 11:00 hrs	153.43	19.79	108.94	128.73
11:00 hrs to 17:00 hrs	253.86	32.75	180.24	212.99
17:00 hrs to 23:00 hrs	145.34	18.75	118.67	137.42
23:00 hrs to 05:00 hrs	157.17	20.27	94.85	115.13
HV2 Urban Schedule: Supply above 11 kV & upto 66 kV	198.28	16.25	134.55	150.80
Summer Months (April to September)	99.14	8.12	67.30	75.42
05:00 hrs to 11:00 hrs	21.43	1.76	12.39	14.14
11:00 hrs to 17:00 hrs	35.46	2.91	24.11	27.02
17:00 hrs to 23:00 hrs	20.30	1.66	15.88	17.54
23:00 hrs to 05:00 hrs	21.95	1.80	14.93	16.73
Winter Months (October to March)	99.14	8.12	67.25	75.37
05:00 hrs to 11:00 hrs	21.43	1.76	14.57	16.33
11:00 hrs to 17:00 hrs	35.46	2.91	24.11	27.02
17:00 hrs to 23:00 hrs	20.30	1.66	15.88	17.54
23:00 hrs to 05:00 hrs	21.95	1.80	12.69	14.49
HV2 Urban Schedule: Supply above 66 kV & upto 132 kV	160.48	10.21	102.49	112.70
Summer Months (April to September)	80.24	5.10	51.27	56.37
05:00 hrs to 11:00 hrs	17.34	1.10	9.44	10.54
11:00 hrs to 17:00 hrs	28.70	1.83	18.37	20.19
17:00 hrs to 23:00 hrs	16.43	1.05	12.09	13.14
23:00 hrs to 05:00 hrs	17.77	1.13	11.37	12.50
Winter Months (October to March)	80.24	5.10	51.22	56.33
05:00 hrs to 11:00 hrs	17.34	1.10	11.10	12.20
11:00 hrs to 17:00 hrs	28.70	1.83	18.37	20.19
17:00 hrs to 23:00 hrs	16.43	1.05	12.09	13.14
23:00 hrs to 05:00 hrs	17.77	1.13	9.67	10.80
HV2 Urban Schedule: Supply above 132 kV	11.78	1.29	7.17	8.46
Summer Months (April to September)	5.89	0.65	3.59	4.23
05:00 hrs to 11:00 hrs	1.27	0.14	0.66	0.80
11:00 hrs to 17:00 hrs	2.11	0.23	1.28	1.52
17:00 hrs to 23:00 hrs	1.21	0.13	0.85	0.98
23:00 hrs to 05:00 hrs	1.30	0.14	0.80	0.94
Winter Months (October to March)	5.89	0.65	3.58	4.23
05:00 hrs to 11:00 hrs	1.27	0.14	0.78	0.92
11:00 hrs to 17:00 hrs	2.11	0.23	1.28	1.52

Consumer Category/ Sub-Category	Projected Sales (MU)	Fixed Charges	Variable Charges	Estimated Revenue (Rs Cr)
17:00 hrs to 23:00 hrs	1.21	0.13	0.85	0.98
23:00 hrs to 05:00 hrs	1.30	0.14	0.68	0.82
HV2 Rural Schedule: Supply at 11 kV	375.77	47.71	246.79	294.49
Sub Total	2165.93	258.58	1496.80	1755.38
HV-3: Railway Traction				
HV3 Railway Traction (at, below and above 132 kV)				
HV3 Metro Traction (at, below and above 132 kV)	37.23	3.58	27.18	30.76
Sub Total	37.23	3.58	27.18	30.76
HV-4: Lift Irrigation & P. Canals above 100 BHP (75 kW)				
HV4 Supply at 11kV	57.99	6.55	49.29	55.84
HV4 Supply above 11kV & upto 66kV	26.87	2.35	22.57	24.92
HV4 Supply above 66 kV & upto 132kV	0.00	0.00	0.00	0.00
Sub Total	84.86	8.89	71.86	80.76
Extra State Consumer	26.51	0.00	19.96	19.96
Bulk Supply Consumer	0.00	0.00	0.00	0.00
Grand Total	26112.43	2532.20	13560.70	16092.90

4.13. Non-Tariff Incomes

4.13.1. The Petitioner has estimated the non-tariff incomes for FY 2024-25 as shown in the table below.

TABLE 4-36 NON-TARIFF INCOME FOR FY 2024-25 (IN RS. CR)

Particulars	Projected
Total Non-Tariff Income	272.42

4.14. GoUP Subsidy

4.14.1. The approval for the Government subsidy in the State budget for the fiscal year 2024-25 is due. Consequently, it is currently unavailable. In light of this, for the present petition, the Licensee has adopted the provisional value set in the budget for FY2023-24 by the Government of Uttar Pradesh (GoUP). Additionally, it is emphasized that, in accordance with Section 65 of the Electricity Act, 2003, the GoUP directly communicates Government subsidy details to the Hon'ble Commission. The Hon'ble Commission may substitute this provisional amount of Government subsidy by the actual subsidy details communicated by the Government of UP to the Hon'ble

Commission for FY 2024-25 and the revenue gap shall be modified accordingly.

4.15. Summary of ARR for FY 2024-25

4.15.1. The Aggregate Revenue Requirement for FY 2024-25 is summarised in the Table below:

TABLE 4-37 ARR FOR FY 2024-25 (IN RS. CR)

S.No	Particulars	ARR
		FY 2024-25 Projected
I.	Power Purchase or Energy Available at Discom Periphery (MU)	30434.07
II.	Sale of Power (MU)	26112.43
III.	Distribution Loss (%)	14.20%
		0.00
A	Expenditure	0.00
a	Cost of Power Procurement	16613.13
b	Transmission and Load Dispatch Charges	803.76
c	Gross O&M Expenses	0.00
i	R&M Expense	470.78
ii	Employee Expenses	990.78
iii	A&G Expense	1090.62
e	Total Gross O&M expenses (i+ii+iii)	2552.18
f	Smart Metering OPEX	325.23
g	Depreciation	622.18
h	Interest on Long-Term Loan	526.43
i	Interest on Security Deposit from Consumers and Distribution system Users	57.93
j	Finance/Bank Charges	34.49
k	Interest on Working Capital	197.94
l	Bad and Doubtful debts	321.86
m	Return on Equity	662.09
n	Income Tax	0.00
	Total Expenditure (A)	22717.22
	Less:	0.00
o	Interest Capitalisation	0.00
p	Employee Capitalisation	197.57
B	Net Expenditure (A-q-r)	22519.65
C	Less: Non Tariff Income	272.42
D	Net Annual Revenue Requirement of Licensee(B-C)	22247.23
	Receipts	0.00
a	Revenue Assessment at Payable Tariff	16092.90
	<i>Revenue from Subsidy and Cross subsidy</i>	5716.98

S.No	Particulars	ARR
		FY 2024-25 Projected
	<i>Revenue Assessment at Full Cost Tariff</i>	21809.88
b	Income from other Business	0.00
c	Revenue from Open Access Customers	0.00
E	Total Revenue (a+b+c)	16092.90
		0.00
F	(Shortfall)/Excess before tariff revision impact (E-D)	(6,154.33)
G	Tariff Revision Impact	-
H	Shortfall/Excess after tariff revision impact (F+G)	(6,154.33)
I	Govt. Subsidy Received/Declared	3,840.02
J	(Shortfall)/Excess(H+J)	(2,314.30)

4.15.2. The Petitioner requests to approve the ARR claimed for FY 2024-25 in above Table.

➤ Consolidated Gap from FY 2022-23 to FY 2024-25

4.15.3. The Petitioner requests to Hon'ble Commission to kindly consider the Gap for True Up year FY 2022-23 and ARR year FY 2024-25 along with the carrying cost as mentioned below for estimation of revised tariff for ARR year FY 2024-25. The table is as under :

TABLE 4-38 CONSOLIDATED GAP FROM FY 2022-23 to FY 2024-25

Particulars	Rate of Interest (%)	Claimed
Revenue (Gap)/Surplus after Truing up of FY 2022-23		(2,690.71)
Carrying Cost for FY 2022-23 (Half Year)	11.00%	(147.99)
Carrying Cost for FY 2023-24 (Full Year)	11.00%	(295.98)
Carrying Cost for FY 2024-25 (Half Year)	11.00%	(147.99)
Total Revenue (Gap)/Surplus for FY 2022-23 (A)		(3,282.67)
Total Revenue (Gap)/Surplus for FY 2024-25 (B)		(2,314.30)
Cumulative Revenue (Gap)/Surplus to be adjusted in FY 2024-25 (C) = (A) + (B)		(5,596.97)

➤ Average Cost of Supply

4.15.4. The average cost of supply consolidated for all the Discoms have been computed as under: -

TABLE 4-39 AVERAGE COST OF SUPPLY FOR FY 2024-25 (CONSOLIDATED FOR ALL DISCOMS)

Particulars	FY 2024-25
Net Annual Revenue Requirement of Licensee (Rs Cr.)	101784.93
Sale of Power (MU)	122754.21
ACOS	8.29

➤ **Net Revenue Gap with Government Subsidy**

4.15.5. As mentioned in Clause No. 4.15.2 of this Petition, in the absence of approved subsidy details for FY 2024-25, the provisional amount of subsidy of Rs 3,840.02 Cr for FY 2024-25 may be adjusted provisionally to bridge the revenue-gap. Accordingly, the net revenue gap is Rs. 2,165.56 Crores which may change as per government Subsidy details for FY 2024-25.

4.15.6. It is further submitted that the Hon'ble Commission in its Tariff Order for FY 2022-23 has also recognised the Government subsidy component of LMV-5 Metered Rural Consumers as per the GoUP direction, as under:

“8.1.12 Further, the Commission is in receipt of a GoUP letter with Ref: 707/24-P-1/2021 dated 25.3.2021 under Section 108 of EA 2003, wherein GoUP mentioned that since majority of the rural LMV-5 consumers are unmetered, and taking into consideration the impact of Covid pandemic, GoUP has decided that tariff rates of rural LMV-5 unmetered consumers may be levied on LMV-5 metered consumers tariff and has directed the Commission to consider the same.

8.1.13 Subsequently, GoUP again sent a letter with Ref: 812/24-1-21-1307/2020 dated 12.5.2021 for billing LMV-5 rural metered as unmetered, however metering of unmetered consumers will also be done and the meter reading will be used for the purpose of energy accounting and subsidy computation. The difference between the revenue at unmetered rates & revenue as per metered energy & rates, would be provided to the Licensees by GoUP.

*8.1.14 Although, this provision is not in conformity of Section 65 of Electricity Act, 2003, in regard to advance subsidy, however, in view of the State Government's commitment to provide additional subsidy in regards to the above arrangement, **the Commission accepts this proposal and the additional subsidy amount, which will be computed at the time of True-up shall be payable by the State Government in conformity to Section 65 of Electricity Act, 2003.**”*

4.15.7. Accordingly, the revenue from LMV-5 metered consumer sub-category will also involve the component of Government Subsidy.

5. Regulatory Assets

- 5.1.1. The Commission in the matter of Regulatory Asset in the Tariff Order dated July 29, 2021 for FY 2021-22 has not accepted the submission of the Petitioners in this regard. The relevant extracts of the Tariff Order for FY 2021-22 are as under:
- 7.1.6 *Accordingly, the Licensee's requested the Commission to approve the above Regulatory Asset on the basis of GoUP letter and provide a roadmap for recovery of the same in line with the provisions of National Tariff Policy, 2016 and UPERC MYT Distribution Regulations, 2019.*
- 7.1.7 *They further apprised that as per clause 1.2(i) of the UP UDAY MOU, the State Government has given the commitment for taking over the future losses of Discoms in a graded manner. The total liability of State Government on this account was Rs. 12,049.49 Crore upto FY 2019 against which the Govt. has already provided support of Rs. 5771.02 Crore and for the remaining balance of Rs. 6278.47 crore, the State Govt. has committed that the same will be provided in next 10 years. The subsidy support from Govt. mentioned in point 5 of the letter is towards the cash losses incurred by the Petitioner due to lower collection efficiency and thus is not related to Regulatory Assets and ARR/Tariff approval procedure.*
- 7.1.8 *The Commission has gone through the letter dated 5.3.2021 received from GOUP and the submissions of the Licensees. At the outset, it is pertinent to mention that the UDAY agreement (MOU) was a tri-partite agreement between GoUP, Central Govt (GOI) and Discoms, wherein GOI facilitated GoUP to take over 75% of the outstanding debt of the Discoms, and facilitated Banks/FIs not to levy any prepayment charges on the Discom debt and waived off any unpaid overdue interest and penal interest on Discom debt. The same was done by the GoUP and Banks/FIs. However, the above letter changes the provisions of the tri-partite UDAY agreement and now the GoUP is unilaterally backing out from its obligations from a retrospective date and changing its share to 'debt' instead of 'taking over the debt'.*
- 7.1.9 *Since, the Commission had also approved the UDAY MoU, the Commission is of the view that giving effect to such arrangement in the manner as provided in the letter by the GOUP will have retrospective implication and will affect all the Tariff Orders (which have already been Trued-up) in which the treatment of UDAY has already been done. Also, such treatment of the funds would affect the interest of public at large and will lead to huge 'tariff-shock'. The same was also discussed in the State Advisory Committee (SAC). The Commission has taken note of the strong opposition by the SAC member, stakeholder and public at large against the revision in computation of Regulatory Assets approved by the Commission as proposed by the Discoms.*
- 7.1.10 *The Commission cannot decide the matter unilaterally under these ARR proceedings and without taking in consideration the outcome of the legal matter pending before Hon`ble APTEL in this respect.*
- 7.1.11 *Therefore, it would not be prudent to accept this change unilaterally on the advice of State Government from the retrospective date, and accordingly, is not accepted.*

- 5.1.2. The Hon'ble Commission has further mentioned that the Commission cannot decide the matter unilaterally under these ARR proceedings and without taking in consideration the outcome of the legal matter pending before the Hon'ble APTEL in this respect.
- 5.1.3. It is further submitted that the carrying cost component will continuously increase with the passing years. The Petitioner requests the Hon'ble Commission to kindly consider the above facts and issue suitable orders while finalizing the Tariff Order.
- 5.1.4. Regulatory Asset from FY 2000-01 to FY 2023-24 (post issue of GOUP Letter) along with the carrying cost is depicted below which shall also be considered while approving the ARR of FY 2024-25: Regulatory Assets from FY 2000-01 to FY 2021-22 (post issue of GOUP Letter)

TABLE 5-1 REGULATORY ASSETS FROM FY 2000-01 TO FY 2021-22 (POST ISSUE OF GOUP LETTER)

Description	MVVNL
True Up of 2000-01 to 2007-08 and its Regulatory Assets / (Surplus) as on 31.03.16	247.61
True Up of 2008-09 to 2011-12 and its Regulatory Assets / (Surplus) as on 31.03.16	4,375.37
True Up of 2012-13 and its Regulatory Assets / (Surplus) as on 31.03.16	2,425.86
True Up of 2013-14 and its Regulatory Assets / (Surplus) as on 31.03.16	1,769.23
True Up of 2014-15 and its Regulatory Assets / (Surplus) as on 31.03.16	59.48
True Up of 2015-16 and its Regulatory Assets / (Surplus) as on 31.03.16	-217.37
Total Regulatory Assets till Trued-UP FY 2015-16	8,660.18
50% of DISCOM debt taken over as per UDAY	0.00
Net RA / (Surplus) Left after UDAY	8,660.18
Carrying Cost @ 12.50% for FY 2016-17	1082.52
Regulatory Assets/(Surplus) of FY 2016-17 in True Up	-265.48
Total Regulatory Assets Trued-Up till FY 2016-17	9,477.22
25% of Discom Debt Takenover as per UDAY	0.00
Net RA / (Surplus) Left after UDAY	9,477.22
Carrying Cost @ 13.75% for FY 2017-18	1,303.12
Regulatory Assets/(Surplus) in True Up with carrying cost for FY 2017-18	-334.01
carrying cost @ 13.75% for FY 2017-18	-22.96
Total Net RA / (Surplus) till trued up for FY 2017-18	10,423.37
Carrying cost @ 14.05% for FY 2018-19	1,464.48
Net Revenue gap / (surplus) after True up of FY 2018-19	-1567.14
Carrying cost @ 14.05% for FY 2018-19	-110.09
Total Net RA / (Surplus) trued up till FY 2018-19	10,210.62
Carrying cost @ 13.80% for FY 2019-20	1,409.07
Total Net RA / (Surplus) trued up till FY 2019-20	11,619.68
Carrying cost @ 10.65% for FY 2020-21	1,237.50
Total Net RA / (Surplus) trued up till FY 2020-21	12,857.18
Carrying cost @ 9.50% for FY 2021-22	1,221.43
Total Net RA / (Surplus) trued up till FY 2021-22	14,078.61
Carrying cost @ 11% for FY 2022-23	1,548.65
Total Net RA / (Surplus) trued up till FY 2022-23	15,627.26

6. Category-wise Revenue and ABR for FY 2024-25

TABLE 6-1 CATEGORY-WISE REVENUE AND ABR FOR FY 2024-25 (IN RS. CR) AT EXISTING TARIFF (CONSOLIDATED FOR ALL DISCOMS)

Consumer Category/ Sub-Category	Consumers	Load (kW)	Projected Sales (MU)	Fixed Charges	Variable Charges	Estimated Revenue (Rs Cr)	Average Billing Rate (Rs/Unit)
LMV-1: Domestic Light, Fan & Power							
Life Line Consumers (both Rural and Urban) (up to 100 kWh/month)	1,68,90,533	1,65,45,364	13,211.48	959.47	3,963.45	4,922.91	3.73
Dom: Rural Schedule (unmetered)	749	1,183	3.07	1.06	-	1.06	3.47
Dom: Rural Schedule (metered) other than BPL	52,51,385	87,65,536	15,504.64	915.44	6,496.32	7,411.76	4.78
0-100 kWh/month	27,68,069	43,53,458	5,748.00	454.43	1,925.58	2,380.01	4.14
101-150 kWh/month	13,96,612	21,81,099	3,889.04	228.05	1,497.28	1,725.33	4.44
151-300 kWh/month	6,55,161	12,44,655	3,074.38	129.92	1,537.19	1,667.11	5.42
Above 300 kWh/Month (Starting from 301 units)	4,31,543	9,86,324	2,793.22	103.04	1,536.27	1,639.31	5.87
Dom: Supply at Single Point for Bulk Load	396	4,20,354	842.29	55.49	589.60	645.09	7.66
Other Metered Domestic Consumers other than BPL	96,13,166	2,11,61,951	29,119.79	2,707.10	16,928.48	19,635.59	6.74
0-100 kWh/month	36,28,739	1,08,28,265	10,890.78	1,385.02	5,989.93	7,374.95	6.77
101-150 kWh/month	24,03,291	39,15,558	5,478.52	500.92	3,013.19	3,514.11	6.41
151-300 kWh/month	16,94,616	33,87,947	7,248.93	433.29	4,349.36	4,782.65	6.60
Above 300 kWh/Month (Starting from 301 units)	18,86,520	30,30,181	5,501.55	387.87	3,576.01	3,963.88	7.21
Sub Total	3,17,56,228	4,68,94,387	58,681.27	4,638.57	27,977.85	32,616.42	5.56
LMV-2: Non Domestic Light, Fan & Power							
Non Dom: Rural Schedule (metered)	4,83,132	12,21,179	1,684.18	155.82	926.30	1,082.11	6.43
Non Dom: Other Metered Non-Domestic Supply	16,66,811	48,43,200	7,189.65	2,282.53	5,649.26	7,931.79	11.03
Load upto 4 kW	15,39,128	35,68,254	5,539.13	1,615.86	4,309.95	5,925.82	10.70
Upto 300 kWh / month	12,30,304	28,10,506	3,810.14	1,272.65	2,857.60	4,130.26	10.84
Above 300 kWh/Month	3,08,824	7,57,748	1,728.99	343.21	1,452.35	1,795.56	10.39
Above 4 kW	1,27,684	12,74,945	1,650.53	666.67	1,339.31	2,005.97	12.15
Upto 1000 kWh / month	1,20,374	12,06,685	839.26	631.01	629.44	1,260.45	15.02
Above 1000 kWh/Month	7,310	68,261	811.27	35.66	709.86	745.53	9.19
Sub Total	21,49,943	60,64,378	8,873.83	2,438.35	6,575.56	9,013.90	10.16
-							
LMV-3: Public Lamps							
Unmetered	2,847	27,126	81.30	162.37	-	162.37	19.97
Unmetered - Gram Panchayat	1,900	5,468	10.76	20.67	-	20.67	19.21
Unmetered - Nagar Palika & Nagar Panchayat	894	12,237	38.21	70.49	-	70.49	18.45
Unmetered - Nagar Nigam	53	9,421	32.33	71.22	-	71.22	22.03
Metered	14,818	2,35,745	800.89	63.16	664.38	727.54	9.08
Metered - Gram Panchayat	8,289	24,532	46.80	5.07	35.10	40.17	8.58
Metered - Nagar Palika & Nagar Panchayat	4,783	76,626	233.92	20.48	187.13	207.61	8.88
Sub Total	17,665	2,62,870	882.19	225.53	664.38	889.91	10.09
LMV-4: Light, fan & Power for Institutions							
Inst: Public	1,98,906	6,94,202	1,108.79	242.71	914.75	1,157.47	10.44
Inst: Private	19,556	1,93,878	307.63	79.04	276.86	355.90	11.57
Sub Total	2,18,462	8,88,080	1,416.42	321.75	1,191.62	1,513.37	10.68
LMV-5: Private Tube Wells/ Pumping Sets							
Consumers getting supply as per "Rural Schedule"	15,18,412	90,76,202	19,459.31	1,318.01	3,226.76	4,544.77	2.34
PTW: Rural Schedule (unmetered) (Total)	2,15,769	13,19,649	3,325.52	541.30	-	541.30	1.63
PTW: Rural Schedule (unmetered)	2,15,769	13,19,649	3,325.52	541.30	-	541.30	1.63
PTW: Rural Schedule (metered) (Total)	13,02,643	77,56,553	16,133.79	776.71	3,226.76	4,003.47	2.48

Consumer Category/ Sub-Category	Consumers	Load (kW)	Projected Sales (MU)	Fixed Charges	Variable Charges	Estimated Revenue (Rs Cr)	Average Billing Rate (Rs/Unit)
PTW: Rural Schedule (metered)	13,02,643	77,56,553	16,133.79	776.71	3,226.76	4,003.47	2.48
PTW: Rural Schedule (Energy Efficient Pumps) (metered)	-	-	-	-	-	-	-
Consumers getting supply as per "Urban Schedule (Metered Supply)"	53,511	4,00,070	481.71	81.46	289.03	370.49	7.69
PTW: Urban Schedule (metered)	53,511	4,00,070	481.71	81.46	289.03	370.49	7.69
Sub Total	15,71,922	94,76,273	19,941.02	1,399.48	3,515.79	4,915.26	2.46
LMV 6: Small and Medium Power upto 100 HP (75 kW)							
Consumers getting supply as per "Rural Schedule"	59,391	5,17,939	669.70	120.36	452.21	572.57	8.55
Up to 20 kW	57,585	4,29,399	549.02	99.79	370.73	470.51	8.57
Above 20 kW	1,807	88,539	120.67	20.58	81.49	102.06	8.46
Consumers getting supply other than "Rural Schedule"	1,54,432	20,05,723	3,155.70	509.22	2,319.49	2,828.71	8.96
Sub Total	2,13,824	25,23,662	3,825.40	629.58	2,771.71	3,401.29	8.89
LMV-7: Public Water Works							
Consumers getting supply as per "Rural Schedule"	42,521	6,38,339	2,422.35	23.90	1,762.27	1,786.17	7.37
Rural Metered	41,110	6,11,597	2,241.37	16.14	1,762.27	1,778.42	7.93
Rural Unmetered	1,411	26,742	180.99	7.75	-	7.75	0.43
Consumers getting supply other than "Rural Schedule"	32,837	10,49,174	2,983.02	21.98	2,378.48	2,400.46	8.05
Urban Metered	31,396	10,20,342	2,798.21	13.42	2,378.48	2,391.90	8.55
Urban Unmetered	1,441	28,833	184.80	8.56	-	8.56	0.46
Sub Total	75,359	16,87,513	5,405.37	45.88	4,140.76	4,186.63	7.75
LMV-9: Temporary Supply							
Metered	35,671	1,62,845	292.08	52.95	255.80	308.75	10.57
Metered TS: Individual residential consumers	10,021	37,417	70.74	8.86	56.60	65.45	9.25
Metered TS: Others	25,649	1,25,428	221.34	44.10	199.20	243.30	10.99
Unmetered	31	229	11.85	8.17	-	8.17	6.90
Unmetered TS: Ceremonies	6	182	0.19	7.81	-	7.81	-
Unmetered TS: Temp shops	25	47	11.65	0.36	-	0.36	0.31
Sub Total	35,701	1,63,074	303.93	61.13	255.80	316.93	10.43
LMV-10: Departmental Employees							
	-	-	-	-	-	-	-
LMV-11: Electrical Vehicles							
Multi Story Buildings	-	-	-	-	-	-	-
LMV-1b	-	-	-	-	-	-	-
HV-1b	-	-	-	-	-	-	-
Public Charging Station	682	30,787	38.89	-	28.99	28.99	7.45
LT	666	14,090	14.99	-	11.54	11.54	7.70
HT	16	16,697	23.90	-	17.45	17.45	7.30
Sub Total	682	30,787	38.89	-	28.99	28.99	7.45
HV-1: Non-Industrial Bulk Loads							
Commercial Loads / Private Institutions / Non-Domestic Bulk Power with contracted Load 75 kW & above and getting supply at single point on 11 kV & above voltage level.	3,332	10,23,916	2,305.99	376.61	1,914.83	2,291.44	9.94
Supply at 11 kV	1,996	6,99,694	2,118.18	263.26	1,762.32	2,025.58	9.56
Supply above 11 kV	1,336	3,24,223	187.81	113.36	152.51	265.86	14.16
Public Institutions, Registered Societies, Residential Colonies / Townships, Residential Multi-Storied Buildings including Residential Multi-Storied Buildings with contracted load 75 kW & above and getting supply at Single Point on 11 kV & above voltage levels	3,681	13,70,827	2,305.99	448.28	1,771.86	2,220.13	9.63
Supply at 11 kV	2,368	9,50,249	2,118.18	315.82	1,631.00	1,946.82	9.19
Supply above 11 kV	1,314	4,20,578	187.81	132.46	140.86	273.32	14.55

Consumer Category/ Sub-Category	Consumers	Load (kW)	Projected Sales (MU)	Fixed Charges	Variable Charges	Estimated Revenue (Rs Cr)	Average Billing Rate (Rs/Unit)
Sub Total	7,014	23,94,743	4,611.98	824.89	3,686.68	4,511.58	9.78
HV-2: Large and Heavy Power above 100 BHP (75 kW)							
HV2 Urban Schedule: Supply at 11 kV	14,540	40,71,973	10,527.70	1,071.88	7,463.91	8,535.79	8.11
HV2 Urban Schedule: Supply above 11 kV & upto 66 kV	505	9,35,755	3,086.00	237.80	2,100.63	2,338.43	7.58
HV2 Urban Schedule: Supply above 66 kV & upto 132 kV	38	3,26,438	790.19	77.20	506.51	583.71	7.39
HV2 Urban Schedule: Supply above 132 kV	3	62,705	221.11	14.87	134.33	149.21	6.75
HV2 Rural Schedule: Supply at 11 kV	1,282	4,24,890	796.96	103.59	523.41	627.00	7.87
Sub Total	16,368	58,21,761	15,421.96	1,505.35	10,728.78	12,234.13	7.93
HV-3: Railway Traction							
HV3 Railway Traction (at, below and above 132 kV)							
HV3 Metro Traction (at, below and above 132 kV)	9	77,169	138.76	20.56	101.29	121.86	8.78
Sub Total	9	77,169	138.76	20.56	101.29	121.86	8.78
HV-4: Lift Irrigation & P. Canals above 100 BHP (75 kW)							
HV4 Supply at 11kV	114	1,24,884	476.61	38.86	405.12	443.98	9.32
HV4 Supply above 11kV & upto 66kV	39	93,163	304.52	28.24	255.80	284.04	9.33
HV4 Supply above 66 kV & upto 132kV	1	1,800	3.65	0.53	3.01	3.54	9.72
Sub Total	154	2,19,848	784.78	67.64	663.92	731.56	9.32
Extra State Consumer	2	5,699	28.37	-	21.37	21.37	7.53
Bulk Supply Consumer	1	11,89,958	2,400.06	-	1,058.43	1,058.43	4.41
Grand Total	3,60,63,334	7,77,00,202	1,22,754.21	12,178.71	63,382.92	75,561.62	6.16

7. Compliance to Directives as per Tariff Order dated 24th May 2023.

TABLE-7-1: COMPLIANCE TO DIRECTIVES ISSUED UNDER TARIFF ORDER FOR FY 2023-24

SN	Description of Directive(s)	Directives in the Tariff Order for FY 2022-23	Compliance Status
11.2.1	The Commission directs the Petitioners to submit the voltage wise (440 V, 11 kV, 33 kV, 66 kV, 132 kV) - Energy Sales and Losses. Also, it is mandatory to submit energy audit report and the cost audit report (prepared in accordance with Companies (Cost Records and Audit) Rules, 2014) along with the ARR / Tariff filing each year.	Immediate	The Petitioner complies the directives as per P1 Format submission under ARR Filing under Filing under prescribed Section Energy Audit Report for FY21 and FY22 is submitted to BEE as per Section 6(1) and 9(1) of Second Schedule of Bureau of Energy Efficiency (Manner and Intervals for Conduct of Energy Audit in electricity distribution companies) Regulations, 2021 attached under Annexure-01 and Cost Audit Report is attached under Annexure-02 and the same is submitted along with the Filing.
11.2.2	The Commission directs the Petitioners, not to book excess sales under the unmetered categories.	Immediate	The State DISCOMS submitted that they are obligated to follow the Hon'ble Commission's Directive.
11.2.3	The Petitioners must submit the details of each investment scheme / project exceeding Rs. 10 Crore and obtain prior approval of the Commission as per Regulations for inclusion as regulatory expenditure in the ARR. Failure to do so will result in disallowance of such investment in order to safeguard the consumers from unjust and unfair charges.	Immediate	The Licensee has submitted the Petition for Capex approval of RDSS Scheme along with the break-up of its components to the Hon'ble Commission on 10.10.2022 and the same are included in True-Up/APR/ARR Section along with this Petition attached herewith Annexure-03 .
11.2.4	The Commission directs the Petitioners to submit the detailed Fixed Asset Register (FAR) in excel with all the details of the assets opening, addition, deduction & closing values, as well as depreciation & cumulative depreciations, with the bifurcation of the assets owned by the Petitioners, assets created out of Grants and assets created out of consumer contribution.	Immediate	The State DISCOMS submitted that they are obligated to follow the Hon'ble Commission's Directive. FAR is attached as Annexure-4 . (Preparation of the Fixed Assets Register (FAR) for FY 2022-23 is under progress.)
11.2.5	The details of category / sub-category wise billing determinants and revenue of		

SN	Description of Directive(s)	Directives in the Tariff Order for FY 2022-23	Compliance Status
	consumers of Franchisee for DVVNL is to be properly submitted in similar manner as is done for own consumers i.e. rather than showing billing determinants of Torrent Power Ltd as bulk supply, category wise billing determinants are to be submitted from next filing otherwise the Torrent Power Ltd would cross-subsidize rest of the consumers which should not be the case. DVVNL also to get an audit done every year on the operational parameters, implementation of Tariff approved by the Commission, billing and collection, infrastructure and service delivery adequacy, status of defaults and dues etc. of Torrent Power Ltd (franchisee of Agra) and submit the report to the Commission, along with the ARR / Tariff filing each year.		Not applicable to the Petitioner.
11.2.6	There is lack of clarity on the interest of security deposited that has been given to the consumers. Petitioners in its submission should clearly demonstrate how much interest on security deposit was required to be given and how much interest has been actually disbursed.	Immediate	The Petitioner humbly submits to the Hon'ble Commission to deal this matter separately under Petition No. 780 of 2012.
11.2.7	The Petitioners are directed to ensure 100% feeder metering and DT metering and separation of agriculture feeders.	Immediate	The Petitioner has already submitted that 100% feeder metering is completed. Further the metering of balance DTs will done under RDSS.
11.2.8	The Petitioners are directed to submit year wise data regarding Surcharge Waiver in various One-Time Settlement (OTS) schemes from the year the same was abolished, to FY 2022-23, in the next filing.	Immediate	The petitioner humbly submits that it is obliged to comply this directive.
11.2.9	All procurements made by the Petitioners should be through Competitive Bidding only.	Immediate	It is hereby submitted that all the power procurement made by UPPCL is through Competitive Bidding and as per the directions provided by the Hon'ble Commission from time to time.
11.2.10	The Petitioners are directed to procure all power through tariff-based competitive bidding process, power exchange or DEEP Portal. As power purchase is dependent on the sales, and increase in sale above the approved limits would	Immediate	It is humbly submitted to the Hon'ble Commission that as per requirement, this is submitted under ARR submissions for FY 2024-25.

SN	Description of Directive(s)	Directives in the Tariff Order for FY 2022-23	Compliance Status
	require additional power to be purchased from the Exchange. With regard to cost of the power, if the same is in approved limits of increase in sales approved by the Commission, Petitioners need not to take prior approval of the Commission. However, if Petitioners need to purchase the power beyond the approved limits then the Petitioners are required to take prior approval of the Commission irrespective of sources of power purchase.		
11.2.11	The Commission directs the Petitioners to submit the MOD stack in accordance with MOD Regulation, 2021.	Immediate	The Petitioner respectfully submits that as per clause 5(2) of UPERC Merit Order Despatch and Optimization of Power Purchase Regulations 2021, UPPCL on behalf of the DISCOM submits the details of variable charges (includes transmission charges and losses) at DISCOM periphery for all the Generating Stations/units to SLDC for preparation of the MOD Stack on fortnightly basis. Further, SLDC schedules power based on the lower variable cost taking into account technical, regulatory, and operational limits of generation and transmission facilities. MOD Stack for the month of Month, 2023 is attached under Annexure-5 .
11.2.12	The Commission directs the Petitioners to ensure to file its ARR/ Tariff Petition on time strictly in accordance with the applicable MYT Regulations, 2019.	Immediate	The DISCOM submitted that they are obligated to follow the Commission's Directive.
11.2.13	The Commission directs that metering of LMV-10 consumers should be completed immediately.	Immediate	Total consumers for LMV-10 as on 31.03.2023 is 12,233. The Petitioner humbly requests the Hon'ble Commission to allow additional time for installation of meters.
11.2.14	The Petitioners are directed to provide	Next ARR Filing	The petitioner humbly

SN	Description of Directive(s)	Directives in the Tariff Order for FY 2022-23	Compliance Status
	the Billing Determinants and revenue collected from LMV - 10 consumers along with ARR / Tariff filing from next year onwards.		submits that the details of LMV-10 consumers for FY 2022-23 is submitted with the tariff petition.
11.2.15	There are several upcoming opportunities for the Licensees to enhance their non-tariff income particularly from the broadband and 5G telecom companies for installation of their equipments on the electric poles and infrastructure of the licensees. The licensees are directed to develop a business plan in this regard and submit the same for the approval of the Commission. The Commission may allow some part of this income as incentive to the licensee through revenue sharing based on implementation of the same. As similar scheme has already been approved by the Commission for UPPTCL	As per the timelines specified	The Petitioner submitted that various initiatives are being taken-up at its associated Stations/Sub-Stations at Discom Level. Further, UPERC (Facilitation of Telecommunication Network) Regulations, 2022 is under progress on it and the same is attached under Annexure-6
11.2.16	The Petitioners shall upload on its website the Petition filed before the Commission along with all regulatory filings, information, particulars and related documents, which shall be signed digitally and in searchable pdf formats along with all Excel files and as per any other provision of the Regulations and Orders of the Commission. The Petitioner shall also ensure that these files are broken into such size which can be easily downloaded and will not keep them in compressed form as the stakeholders find it difficult to extract the files.	As per the timelines specified	Tariff Petitions are filed online as per the directions of the Hon'ble Commission and the Petitioner complies the same.
11.2.17	The Commission encourages the Petitioners to implement a few projects of battery storage. The Licensees are directed to seek innovative solutions based on energy storage systems, other innovative technologies to reduce the system losses, provide better services to the consumers etc.	Next ARR Filing	The Petition is filed on 25.07.2022 for seeking approval of long-term battery energy storage purchase agreement and bidding document for invitation of e-tender for installation of energy storage system in State of Uttar Pradesh under Petition no. 1868/2022. It is humbly submitted that directions from the Hon'ble Commission for implementation of Battery Storage would be complied along with Energy Storage

SN	Description of Directive(s)	Directives in the Tariff Order for FY 2022-23	Compliance Status
			Obligations (ESO) as per guidelines and the Bidding for energy storage systems has been floated on 22.10.2022 by UPPCL.
11.2.18	Provide the details of all the pending cases filed by Petitioners against the Commission in various forums along with the status of the same.	Immediate	The petitioner humbly submits that it has submitted all the pending against the Commission in various forums as Annexure - 7
11.2.19	The Petitioners are directed to submit DSM account details separately from the power purchase along with ARR/ Tariff fillings.	Immediate	The Petitioner humbly submits that State DISCOMS would comply the Suo-Moto proceedings no. 59SM/60SM/61SM of 2022. Accordingly, UPSLDC will provide the DSM accounts to the Hon'ble Commission as per the Commission's order dated 29.09.2022.
11.2.20	Provide the details of land capitalized during the year, along with the purpose of usage and status of usage of land, along with the lease deed for each land capitalized. Also, provide the list of un-utilized land capitalized.	Immediate	The petitioner humbly submits that No land has been capitalized during the year.
11.2.21	Provide the list of Open Access consumers (Long Term, Short Term, Medium Term) along with their consumption and consumer category, along with Petition.	Immediate	The required details are provided under MYT Format F7A along with the Petition.
11.2.22	The Commission directs the Petitioners, that the Open Access shall be allowed to those who wish to avail Open Access as per the provisions outlined by the Commission in its Regulations, Orders and any amendments from time to time.	Immediate	The State DISCOMS submitted that they are obligated to follow the Commission's Directive.
11.2.23	The Petitioners are directed to provide complete details of energy managed through net metering on monthly basis including energy banked / adjusted and the amount / energy settled at the end of financial year and the treatment done for the same in the financial statements and regulatory submissions every year along with ARR / Tariff fillings.	Immediate	
11.2.24	Wherever the opening values in the audited account doesn't match with the closing shown in the previous audited account, the reasons for the same to be	Immediate	The Petitioner complies as per the Hon'ble Commission's directions and for FY 2022-23; audited

SN	Description of Directive(s)	Directives in the Tariff Order for FY 2022-23	Compliance Status
	provided as part of audited accounts henceforth.		financial statements are finalized from respective Finance Dept. Difference, if any, between the opening value of current year and previous year is on account of IND AS8 which requires a retrospective adjustment of prior period items as per which the prior period items identified during the current year are re-stated in the previous relevant year.
11.2.25	Provide the detailed breakup of CWIP claimed for the year along with the Petition.	Immediate	The details are captured in the ARR Formats/ Balance Sheet and the same will be provided at the time of Filing.
11.2.26	Submit the month-wise actual category / sub-category wise Billing Determinants (No. of Consumers, Connected Load & Sales) & actual Revenue for the year along with the future filings.	Immediate	Complied and submitted along with ARR Tariff Filing as per compliance directives.
11.2.27	Submit the reconciliation of the actual O&M expenses (i.e. employee expenses, A&G expenses, R&M expenses) vis-à-vis the normative expenses for the year in the future filings.	Immediate	Reconciliation of the actual O&M expenses (i.e. employee expenses, A&G expenses, R&M expenses) vis-à-vis the normative expenses is submitted in the ARR Petition.
11.2.28	The Petitioners are directed to ensure that actual Power Purchased Cost with detailed break-up of each source, interstate transmission charges, intra-state transmission charges are made part of the audited accounts henceforth.	Next ARR Filing	The State DISCOMS submitted that they are obligated to follow the Commission's Directive.
11.2.29	Ensure that the actual category / sub-category wise Billing Determinants (No. of Consumers, Connected Load & Sales) & category wise actual Revenue are made part of the audited accounts henceforth.	Immediate	Audited Balance Sheet is prepared as per the provisions of Company's Act. Further, category-wise Revenue is already a part of the Balance Sheet.
11.2.30	The Petitioners are directed to ensure that actual Power Purchased (MUs) & ex-bus & energy delivered at Discom periphery (MUs), inter & intra power purchase (MUs) along with inter & intra state losses are made part of the audited accounts henceforth.	Immediate	Audited Balance Sheet is prepared as per the requirements of Company's Act.
11.2.31	Submit the PPA's, Commission's approval and bills of each source from which power is procured, along with the	Immediate	The required details are provided under Annexure-8

SN	Description of Directive(s)	Directives in the Tariff Order for FY 2022-23	Compliance Status
	future True-up / ARR petitions.		
11.2.32	The Petitioners are directed to provide Discom wise details of all the expenses allocated by UPPCL, along with the future True-up / ARR petitions.	Immediate	As per the provisions of the company Act Balance Sheet is finalized capturing all the expenses and the same is audited by CAG.
11.2.33	Submit the details of actual Number of consumers, Connected Load, Sales and Revenue for LMV-10 category consumer, along with the future True-up Petitions.	Immediate	The Petitioner humbly submitted that details along with the petition.
11.2.34	Provide the daily load curves and monthly load curves for last year along with the corresponding N2 region demand curves of exchange and based on this submit a report on the existing ToD time slabs.	Immediate	N2 region demand curves of exchange is not available at Petitioner's end. Daily load curve and Monthly load curve provided from SLDC attached under Annexure-9 .
11.2.35	The Commission observed that the in the few formats the data is incomplete. Also, it has been observed that the Excel files are not linked and formula driven which delay the proceedings. Therefore, the Petitioner is directed to ensure that all the Tariff and additional formats are completely filled and are with formulas and links.	Immediate	The State DISCOMS submitted that they are obligated to follow the Commission's Directive.
11.2.36	The Petitioners are directed to submit a proposal in regard to the category / sub-category wise roadmap for cross-subsidy reduction and take steps to reduce such subsidy to +/- 20% of the Average Cost of Supply (ACoS) in compliance with the provisions of the Tariff Policy, 2016	Immediate	Complied as per the provisions of the Tariff Policy, 2016. Roadmap for cross-subsidy reduction to be done as per directions/guidelines of the Hon'ble Commission.
11.2.37	The Petitioners are directed to provide consolidated data for all Discoms along with each Discoms in future ARR / Tariff Petitions.	Immediate	The State DISCOMS submitted that they are obligated to follow the Commission's Directive.
11.2.38	The Petitioners are directed to show SOP and CGRF expenses separately in the Audited Balance Sheet.	Immediate	The State DISCOMS submitted that they are obligated to follow the Commission's Directive and MVVNL has taken necessary initiative to comply this directive
11.2.39	The proceedings under Petition No. 780 of 2012 are going on in the matter of Security Deposit and the final Orders of the Commission will have a bearing on the Security Deposit treatments for the years that have been Trued Up and due to the above proceedings all approvals	Immediate	The Petitioner complies the proceedings under Petition No. 780 of 2012.

SN	Description of Directive(s)	Directives in the Tariff Order for FY 2022-23	Compliance Status
	will be treated as provisional. The Petitioners are directed to make a detailed filing due to the impact of the final order in the above proceedings in the ARR / Tariff filings to be made after issuance of the final order.		
11.2.40	As per the approved roll out plan dated November 15, 2018 for the Smart Meter opex of the Petitioners is approximately Rs. 101.42/Meter/Month. The monthly bill of the lifeline consumers will be around Rs. 350 as per the Rate Schedule, excluding other charges i.e., Electricity Duty etc. Therefore, cost benefit of providing Smart Meters to such consumers on opex model as for each bill the Licensee needs careful consideration. Accordingly, the Petitioners are directed to take decisions in prudent manner while taking forward the initiatives as per the Smart Meter Roll Out Plan approved by the Commission. The Petitioners are also directed to make detailed submission on the benefits that have been realised viz-a viz the benefits that were submitted for approval of the Smart Meter Roll Out Plan in the next ARR/ Tariff filing.	Immediate	The Petitioner has noted the directions of the Hon'ble Commission and the appropriate study in this regard will be conducted in due course of time.
11.2.41	The Petitioners are directed to submit year-wise (since inception) details of Smart Meters installed with break-up of category / sub-category wise in the next ARR / Tariff filings.	Immediate	The details of Smart Meters are attached under Annexure-10
11.2.42	The Petitioners are directed to enhance the quality of distribution network by employing state-of-the-art technology and contemporary technological solutions which is essential to address the upcoming and new challenges in the sector. Further, the Licensees are directed to focus on institutional capacity building, especially for operations related smart metering, prepaid charging infrastructure, demand response, time of use (TOU), cyber security and privacy of data, usage of AI tools etc. As part of this, in-house Training Centers/ Programs need to be developed to widen the knowledge-base and upgradation competencies of their employees in line with the trend in	Immediate	The Petitioner humbly submits that the details are under compilation and will be submitted to the Commission.

SN	Description of Directive(s)	Directives in the Tariff Order for FY 2022-23	Compliance Status
	technology implementation in the sector which will assist them in bridging the capacity gaps and reduce the reliance on outsourcing of such essential and sensitive services. The Petitioners are required to conduct trainings on SOP and CGRF of the concern and responsible.		
11.2.43	The Petitioners shall not purchase power from High Price Day Ahead Market (HP-DAM) without prior approval of the Commission.	Immediate	The Petitioner submits that short term power procurement for the Petitioner is being managed by UPPCL and directions shall be complied.
11.2.44	The Petitioners shall file quarterly progress report before the Commission on SoP implementation as per UPERC (Standards of Performance) Regulations, 2019.	Immediate	The DISCOM submitted that they are obligated to follow the Commission's Directive.
11.2.45	The Petitioners shall file quarterly progress report before the Commission on CGRF implementation as per UPERC (Consumer Grievance Redressal Forum) Regulations, 2019.	Immediate	The Hon'ble Commission to deal this matter separately under Petition No. 63sm of 2023. The Petitioner humbly submits that the details are under compilation and will be submitted to the Commission.
11.2.46	The Commission directs the Petitioners to follow the RPO trajectory set by the Commission in its First Amendment to the RPO Regulations, 2010 dated August 16, 2019 & any others of the Commission and submit RPO compliance along with Tariff Fillings and other orders of the Commission from time to time.	Immediate	The Petitioner submits that the power purchase procurement and management of MVVNL is being done by UPPCL.
11.2.47	The Commission directs the Petitioners to submit the roadmap for DBT in their next ARR / Tariff filing for its consideration subject to meeting the provisions under Section 65 of the Electricity Act, 2003, wherein the subsidy amount is to be provided in advance.	Immediate	The Petitioner submits that the roadmap may be finalized on the basis of policy regarding DBT on the subsidy amount of the electricity charges which has to be finalized by the GoUP.
11.2.48	The Commission directs the Petitioners to show revenue under different head comprising of revenue from operations (sale of energy to consumers), wheeling charges, CSS and any other charges approved by the Commission separately in the audited accounts and ARR / Tariff	Immediate	The Petitioner is to follow directions of the Commission as directed and will submit details to the Commission.

SN	Description of Directive(s)	Directives in the Tariff Order for FY 2022-23	Compliance Status
	Petition.		
11.2.49	The Commission directs that the direction of earlier Tariff Orders which have not been complied shall be complied immediately.	Immediate	The State DISCOMS submitted that they are obligated to follow the Commission's Directive.

8. Retail and Wheeling Business ARR Summary

- 8.1.1. Clause 39.1 of the MYT (Transmission and Distribution) Regulations, 2019 provide that ARR/Tariff filing by the Distribution Licensee shall separately records for the Distribution Wires Business and Retail Supply Business and shall prepare an Allocation Statement to enable the Hon'ble Commission to determine the Tariff separately for the Distribution Wires Business and Retail Supply Business. In case complete accounting segregation has not been done between the Distribution Wires Business and Retail Supply Business of the Distribution Licensee, the ARR of the Distribution Licensee shall be apportioned between the Distribution Wires Business and Retail Supply Business in accordance with an Allocation Matrix to be prepared by the Licensee and submitted for the Hon'ble Commission's approval.
- 8.1.2. The Petitioner humbly submits that complete segregation of account between wheeling and retail supply has still not taken place, therefore the Petitioner has adopted the basis of allocation of the expenses in line with the methodology used by the Hon'ble Commission in its last Tariff Order.
- 8.1.3. Allocations of Consolidated ARR into wheeling & retail supply for FY 2024-25 have been estimated into following table:

TABLE 8-1: WHEELING AND RETAIL SUPPLY FOR THE FY 2024-25 (IN RS. CR)

Particulars	Allocation %		Allocation (FY 2024-25)		
	Wheeling	Supply	Wheeling	Supply	Total
Power Purchase Expenses (incl PGCIL charges)	0%	100%	0.00	16613.03	16613.03
Apportionment of O&M Expenses & Interest & Finance Charges of UPPCL	0%	100%	0.00	0.00	0.00
Transmission Charges - Intra state (incl SLDC Charges)	0%	100%	0.00	803.76	803.76
Gross O&M Expenses			0.00	0.00	0.00
Gross Employee cost	60%	40%	594.47	396.31	990.78
Gross A&G expenses	40%	60%	436.25	654.37	1090.62
Gross R&M expenses	90%	10%	423.70	47.08	470.78
Smart Metering OPEX	0%	100%	0.00	325.23	325.23
Gross Interest & Finance charges	90%	10%	735.11	81.68	816.79
Depreciation	90%	10%	559.96	62.22	622.18
Gross Expenditure			2749.49	18983.69	21733.17
Expense capitalization			0.00	0.00	0.00
Employee cost capitalized	60%	40%	118.54	79.03	197.57
Interest capitalized	90%	10%	0.00	0.00	0.00
A&G expenses capitalized	40%	60%	0.00	0.00	0.00
Net Expenditure			2630.94	18904.66	21535.60
Provision for Bad & Doubtful debts	0%	100%	0.00	321.86	321.86
Provision for Contingency Reserve	0%	100%	0.00	0.00	0.00

Particulars	Allocation %		Allocation (FY 2024-25)		
	Wheeling	Supply	Wheeling	Supply	Total
Total net expenditure with provisions			2630.94	19226.51	21857.46
Add: Return on Equity	90%	10%	595.88	66.21	662.09
Less: Non-Tariff Income	0%	100%	0.00	272.42	272.42
Aggregate Revenue Requirement (ARR)			3226.83	19020.31	22247.13

9. Wheeling Charges from Open Access Consumers

9.1.1. Clause 39.1 of the MYT (Transmission and Distribution) Regulations, 2019 provide that ARR/Tariff filing by the Distribution Licensee shall separately records for the Distribution Wires Business and Retail Supply Business and shall prepare an Allocation Statement to enable the Hon'ble Commission to determine the Tariff separately for the Distribution Wires Business and Retail Supply Business.

9.1.2. The wheeling charges and Distribution charges has been computed on overall consolidated Discom basis keeping in line with the consistent philosophy of the Hon'ble Commission in past Tariff Orders and Clause 51 of the MYT (Transmission and Distribution) Regulations, 2019.

TABLE 9-1: WHEELING CHARGES FOR FY 2024-25

Wheeling Charges For FY 2024-25			
S.No..	Particulars	Units	FY 2024-25
1	Wheeling ARR	Rs. Crores	13952.40
2	Retail sales (PVVNL, DVVNL, MVVNL, PuVVNL, KESCO)	MU	122754.21
3	Average Wheeling Charge	Rs./kWh	1.14

TABLE 9-2: VOLTAGE-WISE WHEELING CHARGES FOR FY 2024-25

Voltage-Wise Wheeling Charges For FY 2024-25				
S.No..	Particulars	Units	% of Avg. wheeling charge	FY 2024-25
1	Connected at 11 kV			
I	Long Term	Rs./kWh	80%	91%
ii	Medium Term	Rs./kWh	80%	91%
iii	Short Term	Rs./kWh	80%	91%
2	Connected above 11 kV			
I	Long Term	Rs./kWh	50%	57%
ii	Medium Term	Rs./kWh	50%	57%
iii	Short Term	Rs./kWh	50%	57%

TABLE 9-3: DISTRIBUTION CHARGES FOR FY 2024-25

S.No.	Particulars	Units	
1	Retail ARR	Rs. Crores	6616.50
2	Retail sales (PVVNL, DVVNL, MVVNL, PuVVNL, KESCO)	MU	122754.21
3	Average Retail/Distribution charge	Rs./kWh	0.54

10. Cross Subsidy Surcharge (CSS)

10.1.1. The cross-subsidy surcharge for Open Access consumers has been computed in accordance with the methodology specified in Clause 49 of the UPERC MYT (Transmission and Distribution) Regulations, 2019.

10.1.2. As per Clause 49.2 of the UPERC MYT (Transmission and Distribution) Regulations, 2019, the cross-subsidy surcharge is to be computed based on the difference between (i) the tariff applicable to the relevant category of consumers and (ii) the cost of the Distribution Licensees to supply electricity to the consumers of the applicable class. In case of a consumer opting for open access, the Distribution Licensees could be in a position to discontinue purchase of power at the margin in the merit order. Accordingly, the cost of supply to the consumer for this purpose is computed as the aggregate of (a) per unit weighted average cost of power purchase including meeting the Renewable Purchase Obligation; (b) transmission and distribution losses applicable to the relevant voltage level and commercial losses allowed by the Hon'ble Commission; (c) transmission, distribution and wheeling charges up to the relevant voltage level; and (d) per unit cost of carrying regulatory assets, if applicable.

10.1.3. The Petitioner has computed the cross-subsidy surcharge for the relevant consumer categories as per the formula prescribed in Clause 49.2 of UPERC MYT (Transmission and Distribution) Regulations, 2019, which is reproduced as follows:

$$S = T - [C / (1 - L / 100) + D + R]$$

Where:

S is the Cross-Subsidy Surcharge;

T is the tariff payable by the relevant category of consumers, including reflecting the Renewable Purchase Obligation;

C is the per unit weighted average cost of power purchase by the Licensee, including meeting the Renewable Purchase Obligation;

D is the aggregate of transmission, distribution and wheeling charge applicable to the relevant voltage level;

L is the aggregate of transmission, distribution and commercial losses, expressed as a percentage applicable to the relevant voltage level;

R is the per unit cost of carrying regulatory assets;

Provided that the Cross-Subsidy Surcharge shall not exceed 20% of the Tariff applicable to the category of the consumers seeking Open Access."

10.1.4. The category-wise Cross Subsidy Surcharge computed by the Petitioner for FY 2024-25 as per above formula is as given in the Table below:

TABLE 10-1: CROSS SUBSIDY SURCHARGE FOR FY 2024-25

CROSS SUBSIDY SURCHARGE FOR FY 2024-25																
S. No.	Categories	Revenue (IN RS. CR)	Sales (MU)	Average Billing Rate (T)* (Rs./kWh)	Wt. Avg. Pur. Cost (C)** (Rs./kWh)	Aggregate of Trasn., Dist. & Wh. Charges applicable to the relevant voltage level (Rs./kWh)					System Loss (% to the relevant voltage level)			Carrying Cost of Regulatory Assets (Rs./kWh) (R)	S=T-[C/(1-L/100)+D+R]	S*** (Rs./kWh)
						Transmission Charge		Distribution Charge	Wheeling Charge	Aggregate of Trasn., Dist. & Wh. Charges applicable to the relevant voltage level (D)	PGCIL	UPPTCL	Dist. Loss			
						Inter-State Trns. Charges	Intra-State Trns. Charges									
1	HV-1 (Supply at 11 kV)	3972.40	4236.35	9.38	4.78	0.40	0.26	0.54	0.91	2.11	3.77%	3.18%	11.24%	0.00	1.48	1.48
2	HV-1 (Supply above 11 kV)	539.18	375.63	14.35	4.78	0.40	0.26	0.54	0.57	1.77	3.77%	3.18%	1.00%	0.00	7.40	2.87
3	HV-2 (Supply upto 11 kV)	9162.79	11324.66	8.09	4.78	0.40	0.26	0.54	0.91	2.11	3.77%	3.18%	11.24%	0.00	0.20	0.20
4	HV-2 (Supply above 11 kV & upto 66 kV)	2338.43	3086.00	7.58	4.78	0.40	0.26	0.54	0.57	1.77	3.77%	3.18%	1.00%	0.00	0.62	0.62
5	HV-2 (Supply above 66 kV & above 132 kV)	583.71	790.19	7.39	4.78	0.40	0.26	0.54	0.57	1.77	3.77%	3.18%	0.17%	0.00	0.47	0.47
6	HV-3 (For Metro Traction)	121.86	138.76	8.78	4.78	0.40	0.26	0.54	0.74	1.94	3.77%	3.18%	0.17%	0.00	1.70	1.70
7	HV-4 (Supply at 11 kV)	443.98	476.61	9.32	4.78	0.40	0.26	0.54	0.91	2.11	3.77%	3.18%	11.24%	0.00	1.42	1.42
8	HV-4 (Supply above 11 kV upto 66kV)	287.58	308.17	9.33	4.78	0.40	0.26	0.54	0.57	1.77	3.77%	3.18%	1.00%	0.00	2.38	1.87

*Including reflecting the Renewable Purchase Obligation.

**Including meeting the Renewable Purchase Obligation.

***CSS shall not exceed 20% of the Tariff Applicable to the category of the consumer seeking Open Access.

11. Appeal before the Hon'ble APTEL on previous Tariff Orders

- 11.1.1. It is submitted that some of the claim in the Petition for FY 2018-19, was disallowed by the Hon'ble Commission in Order dated 03.09.2019. UPPCL has filed an Appeal bearing Appeal No. 389 of 2019 before the Hon'ble Appellate Tribunal for Electricity challenging the disallowance by the Hon'ble Commission. The said Appeal has been admitted by the Hon'ble Tribunal and is pending adjudication and will have a bearing in this Petition. In view thereof, it is submitted that UPPCL's claim in the present Petition is without prejudice to UPPCL's contentions in Appeal No. 389 of 2019.
- 11.1.2. It is submitted that some of the claim in the Tariff Petition for FY 2020-21, was disallowed by the Hon'ble Commission in Tariff Order dated 11.11.2020. MVVNL has filed an Appeal bearing DFR No. 174 of 2021 before the Hon'ble Appellate Tribunal for Electricity challenging the disallowance by the Hon'ble Commission. The said Appeal has been admitted by the Hon'ble Tribunal and is pending adjudication and will have a bearing in this Petition. In view thereof, it is submitted that UPPCL's claim in the present Petition is without prejudice to UPPCL's contentions in Appeal No. 174 of 2021.
- 11.1.3. It is submitted that some of the claim in the Petition for FY 2021-22, was disallowed by the Hon'ble Commission in Tariff Order dated 29.07.2021. This has been challenged before Hon'ble Appellate Tribunal for Electricity challenging the disallowance by the Hon'ble Commission
- 11.1.4. It is submitted that some of the claim in the Petition for FY 2022-23, was disallowed by the Hon'ble Commission in Tariff Order dated 20.07.2022. This has been challenged before Hon'ble Appellate Tribunal for Electricity challenging the disallowance by the Hon'ble Commission. MVVNL has filed an Appeal bearing DFR No. 433 of 2022 on 06.10.2022, before the Hon'ble Appellate Tribunal for Electricity challenging the disallowance by the Hon'ble Commission.
- 11.1.5. It is submitted that some of the claim in the Petition for FY 2023-24, was disallowed by the Hon'ble Commission in Tariff Order dated 24.05.2023. This has been challenged before Hon'ble Appellate Tribunal for Electricity challenging the disallowance by the Hon'ble Commission. MVVNL has filed an Appeal, before the Hon'ble Appellate Tribunal for Electricity challenging the disallowance by the Hon'ble Commission.

12. Prayers

The Petitioner humbly prays that the Hon'ble Commission may be pleased to:

- a) Admit the Petition accompanying True-Up for FY 2022-23, APR of 2023-24 and ARR for 2024-25.
- b) Allow the Petitioner to procure power through bilateral contracts/exchanges/short term contracts to maintain the desired schedule of supply in the Licensee area in case the power procurement from long term sources falls short of levels envisaged and accordingly allow the Petitioner to claim Incremental Power Purchase Cost on such purchases on quarterly basis and allow the variations in final truing up if any balance adjustment remains;
- c) Allow the Smart Meter OPEX expenses over and above the O&M expenses claim;
- d) Allow the expenses incurred by the Petitioner on account of Licensee fees paid to the Hon'ble Commission, over and above the O&M expenses claim;
- e) The norm approved by the Hon'ble Commission is based on historical parameters and does not cover the actual expenses incurred by the Licensee. It is prayed that the Hon'ble Commission may kindly allow the deviation in O&M norms as submitted under respective sections and amend the norms for parameters of O&M in accordance to the revisional power inherent under Regulation 56 "Power to remove difficulties" and Regulation 57 "Power to amend" of UPERC MYT for Distribution and Transmission Regulations 2019. To approve the Revenue Gap along with the carrying cost as claimed in True-Up and ARR section of this instant Petition;
- f) Allow the Petitioner to add/change / alter / modify this application at a future date;
- g) To condone any inadvertent omissions/ errors/ shortcomings and permit the Petitioners to add/ change/ modify/ alter this filing and make further submissions as may be required at a future date;
- h) To pass such Orders as deemed fit and proper in the facts and circumstances of the case in the interest of justice.

क्र.सं. 1373 / आर.ए.ए.ए.

पत्रावली

दिनांक 29/08/2023

ई-मेल द्वारा प्राप्त

18

F. No. 24/3/3/2019-PFC(MoP)-Part(2)-(E-263367)

Government of India

Ministry of Power

Shram Shakti Bhawan, Rafi Marg
New Delhi, Dated: 28th August, 2023

To,
The Secretary, FOR
The Secretaries of all SERCs and JERCs

Sub: Compliance with Rule 20 of the Electricity Rules

Sir,

Rule 20 of the Electricity Rules prescribed that the trajectory for loss reduction to be adopted by the regulators for fixation of the tariff shall be in accordance with the trajectory finalized with the agreement of the respective State Governments and the approval of the Central Government. A copy of the said Rule is enclosed. A copy of the trajectory prescribed with the agreement of the State Government and approval of the Central Government is also enclosed. It has come to the notice of the Central Government that one or two SERCs have adopted losses reduction trajectories, which is at variance with the trajectory laid down as per the Rules. This is a violation of the Law and I have been directed to request you to take immediate corrective action by adopting the loss reduction trajectory laid down under the Rule and fixing the tariff accordingly.

All MDs

Dir(PFA)/D/F

Dir(COM) ✓

Encl.: As above

28.08.23

5611-MDS/23
28/08/23

28/08/2023

(Jamiruddin Ansari)
Deputy Secretary to the Govt. of India
Tel: 011-23352913

(पंकज कुमार)

प्रबन्ध निदेशक

प्रदेश स्तर कारपोरेशन

Copy to:

1. ACS/ Principal Secretary/ Secretary (Energy/ Power) of all States and UTs
2. CMDs/ MDs of DISCOMs of all States and UTs
3. CMD, REC/ PFC Ltd.

Also Copy to:

1. PS to Hon'ble Minister of Power & NRE
2. PPS to Secretary (Power)
3. PPS to Joint Secretary (Distribution)

CE(RAU)

2470/CE/RAU/23

29/08/23

14
24/8

(अमित कुमार श्रीवास्तव)
निदेशक (वाणिज्य)
उपग्रहोपकरणलि

SE-1/SE-2/EE-1/EE-2/EE-3

20/08/23
CE(RAU)


सत्यमेव जयते

भारत का राजपत्र

The Gazette of India

सी.जी.-डी.एल.-अ.-27072023-247640
CG-DL-E-27072023-247640

असाधारण
EXTRAORDINARY

भाग II—खण्ड 3—उप-खण्ड (i)
PART II—Section 3—Sub-section (i)

प्राधिकार से प्रकाशित
PUBLISHED BY AUTHORITY

सं. 438]
No. 438]

नई दिल्ली, बुधवार, जुलाई 26, 2023/श्रावण 4, 1945
NEW DELHI, WEDNESDAY, JULY 26, 2023/SHRAVANA 4, 1945

विद्युत मंत्रालय

अधिसूचना

नई दिल्ली, 26 जुलाई, 2023

सा.का.नि. 558(अ).—केन्द्रीय सरकार, विद्युत अधिनियम, 2003 (2003 का 36) की धारा 176 द्वारा प्रदत्त शक्तियों का प्रयोग करते हुए, विद्युत नियम, 2005 को और संशोधन करने के लिए, निम्नलिखित नियम बनाती है, अर्थात्:

1. (1) इन नियमों का संक्षिप्त नाम विद्युत (द्वितीय संशोधन) नियम, 2023 है।

(2) ये राजपत्र में उनके प्रकाशन की तारीख को प्रवृत्त होंगे।

2. विद्युत नियम, 2005 (जिन्हें इसमें इसके पश्चात उक्त नियम कहा गया है) के नियम 15 के स्थान पर, निम्नलिखित नियम रखा जाएगा, अर्थात्

"15. सब्सिडी लेखांकन तथा भुगतान:—(1) अधिनियम की धारा 65 के अधीन भुगतान योग्य सब्सिडी का लेखांकन, इस संबंध में, केंद्रीय सरकार द्वारा जारी मानक प्रचालन प्रक्रियाओं के अनुसार वितरण अनुज्ञप्तिधारक द्वारा किया जाएगा।

(2) राज्य आयोग द्वारा, अपने न्यायाधिकार क्षेत्र में प्रत्येक वितरण अनुज्ञप्तिधारी के लिए, तिमाही रिपोर्ट जारी की जाएगी, जिसमें अन्य सुसंगत ब्यौरों के अतिरिक्त इस निष्कर्ष की सूचना दी जाएगी कि क्या सुसंगत तिमाही में वितरण अनुज्ञप्तिधारी द्वारा सब्सिडी की मांग, सब्सिडी प्राप्त श्रेणी द्वारा खपत की गई ऊर्जा और राज्य सरकार द्वारा घोषित उपभोक्ता श्रेणी-वार प्रति यूनिट सब्सिडी, अधिनियम की धारा 65 के अनुसार सब्सिडी के वास्तविक भुगतान तथा देय एवं भुगतान की गई सब्सिडी के बीच के अंतर लेखे के आधार पर की गई थी।

स्पष्टीकरण: इस नियम के प्रयोजन के लिए, उपयुक्त आयोग द्वारा जारी संबद्ध विनियमों अथवा टैरिफ आदेशों के अनुसार, ('यूनिट' शब्द से किलो वाट घंटा (केडब्ल्यूएच) अथवा किलो वाट (केडब्ल्यू) अथवा हॉर्स पावर (एचपी) अथवा किलो वोल्ट एम्पियर (केवीए) अभिप्रेत है।

(3) वितरण अनुज्ञप्तिधारी द्वारा तिमाही रिपोर्ट संबंधित तिमाही की समाप्त तारीख से तीस दिन के भीतर प्रस्तुत की जाएगी और राज्य आयोग रिपोर्ट की जांच करेगा, और उप-नियम (2) के अनुसार, इसे प्रस्तुत करने के तीस दिन के भीतर, संशोधनों, यदि कोई हों, के साथ जारी करेगा।

(4) यदि सब्सिडी का अग्रिम भुगतान नहीं किया गया है तो, राज्य आयोग, अधिनियम की धारा 65 के उपबंधों के अनुसार, बिना सब्सिडी के टैरिफ के कार्यान्वयन के लिए आदेश जारी करेगा।

(5) यदि सब्सिडी लेखांकन और सब्सिडी के लिए बिल देने की प्रक्रिया अधिनियम अथवा उसके अधीन नियमों अथवा विनियमों के अनुसार नहीं पाई जाती है तो, राज्य आयोग, अधिनियम के उपबंधों के अनुसार गैर-अनुपालन के लिए अनुज्ञप्तिधारी के संबंधित अधिकारी के विरुद्ध उपयुक्त कार्रवाई करेगा।"

3. उक्त नियम में, विद्यमान नियम 20 की क्रम संख्या को नियम 21 के रूप में पुनः संख्याकित किया जाएगा और इस क्रम संख्या 21 के पहले, निम्नलिखित नियम अंतर्विष्ट किया जाएगा, अर्थात्:-

"20. वित्तीय स्थिरता के लिए फ्रेमवर्क: (1) टैरिफ निर्धारण के लिए राज्य आयोगों द्वारा अनुमोदित की जाने वाली सकल तकनीकी एवं वाणिज्यिक हानि में कमी की ट्रेजेक्टरी संबंधित राज्य सरकारों द्वारा सहमत और केन्द्रीय सरकार द्वारा अनुमोदित किसी राष्ट्रीय स्कीम अथवा कार्यक्रम अथवा अन्यथा के अनुसार होगी।

(2) वितरण अनुज्ञप्तिधारी के लिए, संग्रहण तथा बिलिंग दोनों दक्षताओं के लिए ट्रेजेक्टरी, के उप-नियम (1) के अधीन अनुमोदित ट्रेजेक्टरी के अनुसार राज्य आयोग द्वारा अवधारित किया जाएगा।

(3) विद्युत (उपभोक्ता अधिकार) नियम, 2020 के अधीन उपभोक्ताओं की विद्युत की 24X7 आपूर्ति सुनिश्चित करने के लिए और विद्युत (संशोधन) नियम, 2022 के अधीन तैयार की गई संसाधन पर्याप्तता योजना के अनुसार अपेक्षाओं को पूरा करने के लिए, वितरण अनुज्ञप्तिधारी द्वारा की गई, विद्युत की खरीद की समस्त विवेकपूर्ण लागतों की गणना में सम्मिलित किया जाएगा, यदि विद्युत की खरीद पारदर्शी ढंग से की गई हो अथवा खरीद मूल्य का उपयुक्त आयोग द्वारा अनुमोदन किया गया हो।

(4) वितरण अनुज्ञप्तिधारी द्वारा अधिनियम की धारा 42 की उप-धारा (1) के अनुसार वितरण प्रणाली के विकास एवं अनुरक्षण के लिए परिसंपत्तियों के निर्माण के लिए की गई समस्त विवेकपूर्ण लागतें पास-श्रू होंगी।

परंतु वितरण अनुज्ञप्तिधारी द्वारा निर्मित परिसंपत्तियों के लिए लागत का ऐसा पास-श्रू निम्नलिखित शर्तों के अधीन होगा:-

- (i) परिसंपत्ति का निर्माण अनुज्ञप्तिधारी के लिए संबंधित राज्य आयोग द्वारा अनुमोदित कैपेक्स रोल आउट प्लान के अनुसार किया गया हो;
- (ii) परिसंपत्ति की खरीद प्रतिस्पर्धी एवं पारदर्शी ढंग से की गई हो;
- (iii) परिसंपत्ति को जियो-टैग किया गया हो और निश्चित परिसंपत्ति रजिस्टर में उचित ढंग से दर्ज किया गया हो।"

(5) अनुमोदित सकल तकनीकी एवं वाणिज्यिक हानि में कमी की ट्रेजेक्टरी से विचलन के कारण वितरण अनुज्ञप्तिधारी के लाभ अथवा हानि की गणना औसत विद्युत क्रय लागत के आधार पर की जाएगी और वितरण अनुज्ञप्तिधारी तथा उपभोक्ताओं के बीच भागीदारी की जाएगी। टैरिफ में लाभ का दो-तिहाई उपभोक्ताओं को जाएगा और शेष वितरण अनुज्ञप्तिधारी द्वारा रखा जाएगा। हानि की दो-तिहाई का वहन वितरण अनुज्ञप्तिधारी द्वारा किया जाएगा और शेष का वहन उपभोक्ताओं द्वारा किया जाएगा।

(6) वितरण अनुज्ञप्तिधारी के लिए प्रचालन एवं अनुरक्षण मानदंड, प्राधिकरण द्वारा जारी दिशा-निर्देशों के अनुसार राज्य आयोगों द्वारा अवधारित किए जाएंगे।

(7) राज्य आयोग द्वारा इच्छिटी पर उचित लाभ की अनुमति समग्र जोखिम के मूल्यांकन और प्रचलित पूंजी की लागत के आधार पर दी जाएगी।

(8) राज्य आयोग द्वारा इक्विटी पर लाभ को संबंधित अवधि के लिए, वितरण व्यापार में संबद्ध जोखिमों पर ध्यान देते हुए उपयुक्त संशोधन के साथ, केंद्रीय आयोग द्वारा उत्पादन एवं परीक्षण के लिए अपने टैरिफ विनियमों में निर्दिष्ट इक्विटी पर लाभ के साथ संरेखित किया जाएगा।

[फा. सं. 23/18/2022-आरएंडआर]

पीयूष सिंह, संयुक्त सचिव

टिप्पण: मूल नियम वर्ष 2005 में भारत के राजपत्र की अधिसूचना संख्या सा.का.नि. 379 (अ), तारीख 8 जून, 2005 द्वारा प्रकाशित किए गए थे और इन्हें अंतिम बार संख्या 817 (अ) तारीख 31 दिसंबर, 2020 तथा सा.का.नि.911 (अ) तारीख 29 दिसंबर, 2022 और सा.का.नि. 466 (अ) तारीख 30 जून, 2023 द्वारा संशोधित किया गया था।

MINISTRY OF POWER

NOTIFICATION

New Delhi, the 26th July, 2023

G.S.R. 558(E).—In exercise of the powers conferred by section 176 of the Electricity Act, 2003 (36 of 2003), the Central Government hereby makes the following rules, further to amend the Electricity Rules, 2005, namely:-

1. (1) These rules may be called the Electricity (Second Amendment) Rules, 2023.

(2) They shall come into force on the date of their publication in the Official Gazette.

2. For rule 15 of the Electricity Rules, 2005 (hereinafter referred to as the said rules), the following rule shall be substituted, namely:-

“15. Subsidy accounting and payment.—(1) The accounting of the subsidy payable under section 65 of the Act, shall be done by the distribution licensee, in accordance with the Standard Operating Procedures issued by the Central Government, in this regard.

(2) A quarterly report shall be issued by the State Commission for each distribution licensee, in its jurisdiction, giving findings whether demands for subsidy were raised by the distribution licensee in the relevant quarter based on accounts of the energy consumed by the subsidised category and consumer category wise per unit subsidy declared by the State Government, the actual payment of subsidy in accordance with section 65 of the Act and the gap in subsidy due and paid as well as other relevant details.

Explanation: For the purpose of this rule, (The term “Unit” means Kilo Watt Hour (kWh) or Kilo Watt (kW) or Horse Power (HP) or Kilo Volt Ampere (kVA), in accordance with the relevant Regulations or the Tariff Orders issued by the Appropriate Commission.

(3) The quarterly report shall be submitted by the distribution licensee within thirty days from end date of the respective quarter and the State Commission shall examine the report, and issue it with corrections, if any, in accordance with sub-rule (2), within thirty days of the submission.

(4) In case the subsidy has not been paid in advance, then the State Commission shall issue order for implementation of the tariff without subsidy, in accordance with provisions of the section 65 of the Act.

(5) If subsidy accounting and the raising bills for subsidy is not found in accordance with the Act or Rules or Regulations issued there under, the State Commission shall take appropriate action against the concerned officers of the licensee for non-compliance as per provisions of the Act.

3. In the said Rules, the existing rule 20 shall be re-numbered as rule 21 and before rule 21 as so re-numbered, the following rule shall be inserted, namely:-

“20. Framework for Financial Sustainability: (1) The Aggregate Technical and Commercial loss reduction trajectory to be approved by the State Commissions for tariff determination shall be in accordance with the trajectory agreed by the respective State Governments and approved by the Central Government under any national scheme or programme, or otherwise.

(2) The trajectory for both collection and billing efficiency, for distribution licensee shall be determined by the State Commission in accordance with the trajectory approved under sub-rule (1).

(3) All the prudent costs of power procurement, incurred by distribution licensee for ensuring 24x7 supply of electricity to consumers under the Electricity (Rights of Consumers) Rules, 2020 and for meeting requirements

as per Resource Adequacy plan prepared under the Electricity (Amendment) Rules 2022 shall be taken into account, provided that the procurement of power has been done in a transparent manner or procurement price has been approved by the Appropriate Commission.

(4) All the prudent costs incurred by the distribution licensee for creating the assets for development and maintenance of distribution system in accordance with sub-section (1) of section 42 of the Act shall be pass-through:

Provided that such pass-through of the cost for the assets created by the distribution licensee shall be subject to following conditions:-

(i) the asset has been created in accordance with the capex roll out plan for the licensee approved by the respective State Commission.

(ii) the asset has been procured in competitive and transparent manner.

(iii) the asset is geo-tagged and properly recorded in Fixed Asset Register.

(5) Gains or losses accrued to distribution licensee due to deviation from approved Aggregate Technical and Commercial loss reduction trajectory shall be quantified on the basis of Average Power Purchase Cost and shared between the distribution licensee and consumers. Two third of the gains shall be passed on to the consumers in tariff and rest shall be retained by the distribution licensee. Two third of the losses shall be borne by the distribution licensee and rest shall be borne by the consumers.

(6) The operation and maintenance norms for distribution licensee shall be determined by the State Commissions in accordance with the guidelines issued by the Authority.

(7) Reasonable Return on Equity shall be permitted, with the assessment of overall risk and the prevalent cost of capital.

(8) The Return on Equity by the State Commission shall be aligned with the Return on Equity specified by the Central Commission for generation and transmission in its Tariff Regulations for the relevant period, with appropriate modification taking into account the risks involved in distribution business.

[F. No. 23/18/2022-R&R]

PIYUSH SINGH, Jt. Secy.

Note: The Principal Rules were published 2005 in the Gazette of India, Part-II, Section 3, Sub-section (i) vide number G.S.R 379 (E), dated the 8th June, 2005 and was last amended vide number G.S.R. 817 (E), dated 31st December, 2020 and vide number G.S.R. 911 (E), dated 29th December, 2022 and vide number G.S.R 466 (E), dated the 30th June, 2023.

**AT&C Loss (%) Target finalised under RDSS with the agreement of
respective State Governments**

State	Discoms	AT&C Loss targets in %			
		FY2022	FY2023	FY2024	FY2025
Andaman and Nicobar	ANI PD	21.50	20.50	17.00	13.00
Andhra Pradesh	APCPDCL	16.45	14.13	11.54	10.83
	APEPDCL	13.02	12	11	9.01
	APSPDCL	24.29	20.01	15	12.78
Arunachal Pradesh	AP Power Dept	45	35	28	22
Assam	APDCL	17.3	16.5	15.8	13.0
Bihar	NBPDCL	25	22	19	16
	SBPDCL	35	31	25	20
Chhattisgarh	CSPDCL	17.94	15.9	14.32	13.1
Delhi	NDMC	-	9	8	7
Goa	GED	12.5	12	11	10.25
Gujarat	DGVCL	8.00	7.90	7.80	7.70
	MGVCL	10.81	10.31	9.81	9.31
	PGVCL	18.22	17.22	16.22	15
	UGVCL	7.35	7.3	7.25	7.2
Haryana	DHBVNL	15.25	14.5	13.5	12.5
	UHBVNL	15.25	14.5	13.5	12.5
Himachal Pradesh	HPSEBL	13.52	12.7	11.53	10.15
Jammu & Kashmir	Jammu PDD	50.00	44.00	37.00	27.00
	Kashmir PDD	65.00	54.00	44.00	34.00
Jharkhand	JBVNL	36	30	24	19
Kerala	KSEBL	13	12.2	11.5	10.5
	TCED	8.54	8.35	8.14	8
Ladakh	Ladakh PDD	49.04	38	28	20

State	Discom	AT&C Losses (Average) In %			
		FY2022	FY2023	FY2024	FY2025
Madhya Pradesh	MP Central	41.02	36.18	26.99	19.57
	MP East	36.55	32.06	24.27	19.49
	MP West	24.05	18.7	16.09	13.4
Maharashtra	MSEDCL	20	18	15.5	13
	BEST	8	7.8	7.6	7.5
Manipur	MSPDCL	20	18	15.5	13
Meghalaya	MePDCL	30.00	25.00	21.00	18.00
Mizoram	Mizoram PD	24.00	21.00	17.50	14.00
Nagaland	Nagaland PD	52	42	34	25.6
Puducherry	PED	16.99	16.5	14	11.56
Punjab	PSPCL	16.5	15	14	13.5
Rajasthan	AVVNL	21.7	17.91	15.75	14.25
	JdVVNL	27.25	23.5	19.5	16
	JVVNL	23.5	20.15	17.7	15
Sikkim	PD-Sikkim	29	25	20	15
Tamil Nadu	TANGEDCO	13.73	13.24	12.4	11.92
Tripura	TSECL	32	28	23	19
Uttar Pradesh	DVVNL	38.24	31.06	25.26	18.97
	KESCO	15.94	13.49	10.65	8.07
	MVVNL	31.76	26.6	21.08	17.97
	PaVVNL	21.1	17.41	15.06	12.69
	PuVVNL	32.32	27.84	22.75	18.49
Uttarakhand	UPCL	17.2	16.1	14.99	13.96
West Bengal	WBSEDCL	20	17.5	15.5	12.11





Managing Director UPPCL <mduppcl12@gmail.com>

Fwd: Compliance with Rule 20 of the Electricity Rules reg.

1 message

UR&SI-II Section <ursi2desk-mop@gov.in>

28 August 2023 at 14:13

To: cerggvymizo@gmail.com, cetransgen@gmail.com, cepower1@gmail.com, cmd@gridco.co.in, ao@southcoodisha.com, ao@nescoodisha.com, sabyasachi padhi <sabyasachi.padhi@nescoodisha.com>, ao wesco <ao.wesco@wescoodisha.com>, cmd-ppcl@ppcl.in, md@jvvn.org, avvn10145@yahoo.com, cmd jdvvnl <cmd_jdvvn@yahoo.com>, md jdvvnl <md.jdvvn@rajasthan.gov.in>, mdjodhpurdiscom@gmail.com, secypower sikkim <secypower.sikkim@gmail.com>, phigu05@gmail.com, CMD TSSPDCL <cmd@tssouthernpower.com>, cmd@tsnpdcl.in, mduppcl12@gmail.com, mdpurvanchalvvn@gmail.com, md mvvn2010 <md.mvvn2010@gmail.com>, md@pvvn.org, mdpaschimanchalvvn@gmail.com, dvvnmd@gmail.com, md@upci.org, cmd@wbsedcl.in, managing.director@tsecl.in, gm@bestundertaking.com, CORPORATE OFFICE CHAIRMAN AND MANAGING DIRECTOR <cmd@apsdcl.in>, Assistant secretary Thrissur Corporation <astced.lsgd@kerala.gov.in>, MPEastDiscom@mpez.co.in, mdkesco@gmail.com, md@kesco.co.in, vidyutarunachal@rediffmail.com, vidyutarunachal@gmail.com

Cc: JAMIRUDDIN ANSARI <jamiruddin.ansari@gov.in>, "Bimlesh Pawar Under Secretary, Ministry of Power" <bimlesh.pawar@nic.in>, Naresh Kumar <naresh.kr42@gov.in>, cmd <cmd@pfcindia.com>, CMD REC Limited <cmd-recl@recl.nic.in>, CMD REC Limited <cmd@recl.in>, sk shah <sk_shah@pfcindia.com>, RAHUL DWIVEDI Maharashtra <rahul.dwivedi83@nic.in>, Kuldeep Rai <kuldeep.rairecl.in>


Sir/Madam,

Please find attached herewith a copy of letter dated 28.08.2023 along with enclosure, on the subject mentioned above for information and necessary action.

With Regards

Utility Reforms & Special Interventions - II,
Ministry of Power, Govt. of India,
Shram Shakti Bhawan, Rafi Marg,
New Delhi-110001.

This message, including any attachments, may include privileged, confidential and/or inside information. Any distribution or use of this communication by anyone other than the intended recipient is strictly prohibited and may be unlawful. If you are not the intended recipient, please notify the sender by replying to this message and then delete it from your system.

 Compliance with Rule 20 of the Electricity Rules.pdf
1182K

