

Response to Additional Data Gaps/ Queries on Petition for Truing up of FY 2022-23 and Determination of tariff for FY 2024-25 for PGVCL

<u>Serial No</u>	<u>Reference</u>	<u>PGVCL COMPLIANCE</u>																																																
1.		SLDC certificate for the energy input at the DISCOM Periphery for FY 2022-23																																																
	Compliance	GUVNL on behalf of State owned DISCOMs is purchasing power from various generating stations and allocating it to DISCOMs through BST mechanism. Further, the input energy billed to DISCOMs is based on the energy certified by SLDC at respective periphery in monthly State Energy Accounts (SEA). The copies of month wise SEA of FY 2022-23 are annexed as Annexure-GU-01 (collectively) .																																																
2.		Station wise Power allocation to the Petitioner																																																
	Compliance	As regard to the Station wise Power allocation, it is to state that the station wise energy scheduled is being certified by SLDC in monthly SEA. Since DISCOMs follows the BST mechanism, the actual power purchase expenditure allocation is being worked out following the BST principle approved by the Commission.																																																
3.		Please provide the reconciliation of distribution losses, Power Availability at DISCOM periphery and metered sales																																																
	Compliance	The DISCOM wise detailed energy balance statement showing energy input to Transmission and Distribution system is provided in Table 10 whereas category wise energy sold to consumers is provided in the Table 8 of the Tariff petition.																																																
4.	Table 10	The PGCIL losses submitted by Petitioner are 812.05 MUs against the approved value of 621.09 MUs which is more than double. Provide the reconciliation of Transmission Pool losses and provide justification for the same.																																																
	Compliance	<p>In this regard, it is to state that WRLDC notifies the pooled losses for energy schedule through CTU network on weekly basis and same has been considered for working out the PGCIL system pooled losses for FY 2022-23. The copy of weekly pooled losses notified by WRLDC is annexed as Annexure-GU-02 (collectively) whereas the details for Power Purchase from Inter-State entities on which PGCIL losses are applicable is a part of information contained in Form 02. The details of DISCOM wise pooled losses are as under:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th colspan="6">Units purchased from Central Sector during 2022-23</th> <th colspan="2" rowspan="2">Pooled Losses for FY 2022-23</th> </tr> <tr> <th>Month</th> <th>PGVCL</th> <th>UGVCL</th> <th>MGVCL</th> <th>DGVCL</th> <th>Total</th> <th>DISCOMs</th> <th>Mus</th> </tr> </thead> <tbody> <tr> <td>Apr-22</td> <td>1945365788</td> <td>1361139341</td> <td>531458999</td> <td>1082757360</td> <td>4920721488</td> <td></td> <td></td> </tr> <tr> <td>May-22</td> <td>1952144307</td> <td>1472427765</td> <td>569197415</td> <td>1096572273</td> <td>5090341760</td> <td></td> <td></td> </tr> <tr> <td>Jun-22</td> <td>1844511072</td> <td>1464933956</td> <td>646246577</td> <td>1285060293</td> <td>5240751898</td> <td>DGVCL</td> <td>532.41</td> </tr> <tr> <td>Jul-22</td> <td>1666617752</td> <td>1163805894</td> <td>641238346</td> <td>1371164953</td> <td>4842826945</td> <td>MGVCL</td> <td>277.34</td> </tr> </tbody> </table>	Units purchased from Central Sector during 2022-23						Pooled Losses for FY 2022-23		Month	PGVCL	UGVCL	MGVCL	DGVCL	Total	DISCOMs	Mus	Apr-22	1945365788	1361139341	531458999	1082757360	4920721488			May-22	1952144307	1472427765	569197415	1096572273	5090341760			Jun-22	1844511072	1464933956	646246577	1285060293	5240751898	DGVCL	532.41	Jul-22	1666617752	1163805894	641238346	1371164953	4842826945	MGVCL	277.34
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		Aug-22	1656610062	1130211514	629539250	1380898308	4797259134	PGVCL	812.05
		Sep-22	1835924668	1419662220	660632060	1297718488	5213937436	UGVCL	593.08
		Oct-22	2075517912	1620579796	644323785	1074841014	5415262507	Total	2214.88
		Nov-22	2095481548	1623052343	759829627	1459727524	5938091042		
		Dec-22	2002264188	1486127590	676874039	1330411561	5495677378		
		Jan-23	1991113131	1392541755	523247321	1142563098	5049465305		
		Feb-23	1739509592	1180661332	669552819	1132501024	4722224767		
		Mar-23	1938201401	1327026610	817780971	1274636106	5357645088		
		Total	22743261421	16642170116	7769921209	14928852002	62084204748		
5.	Table 11 and Para 3.6.5	Details with respect to Rs. 295.51 Cr Towards power purchase cost related liabilities towards various generators by GUVNL. Also, details w.r.to Rs. 2764.35 Cr provision by the GUVNL							
	Compliance GUVNL	<p>In this regard, it is to state that the power purchase expenses related provisions are accounted in the books of accounts in accordance with the prevailing accounting standards. Thus, as per standard business practices and on best estimation basis provisions are created in books of accounts towards the amount decided, accrued and quantified by various forums and there is immediate liability to pay but due to pendency of matters in higher forum or otherwise towards disputed matters etc.</p> <p>Further, as per the principle adopted by Hon'ble Commission in past years tariff petition, provision amount of Rs. 295.51 Cr is not being claimed as a part of power purchase expense during truing up of FY 2022-23 and shall be claimed upon actual utilisation/realisation in subsequent year as part of power purchase expense.</p> <p>Accordingly, provisions of around Rs. 295.51 Cr has been created towards aforesaid reasons for FY 2022-23 whereas the provisions provided earlier of the around Rs. 2764.35 Cr has been written back and accordingly treatment is given in the Power Purchase Expenses for FY 2022-23.</p> <p>The net impact of Rs. 2468.85 Cr (i.e. Rs. 2764.35 – Rs. 295.51 Cr) has been apportioned as a part of power purchase expense and the same is part of GUVNL's Annual Account.</p>							

6.	Table 11	Provide the allocation methodology of Power Purchase cost by GUVNL for FY 2022-23														
	Compliance GUVNL	It is to state that Hon'ble Commission has approved BST Mechanism for allocation of power purchase cost incurred by GUVNL to DISCOMs. Accordingly, the power purchase cost incurred by GUVNL from various sources for FY 2022-23 is allocated to DISCOMs under differential bulk supply tariff mechanism.														
7.	Table 12	Detailed justification of power purchase from different sources along with bills of GUVNL.														
	Compliance GUVNL	It is to state that Hon'ble Commission in the Tariff order 31.03.2022 has approved various sources for purchase of power viz (i) Generating Plants of GSECL, (ii) Central Sector Power Plants- NTPC, NPC and SSNNL, (iii) Renewable sources of power – Solar, Wind, Other RE Sources, (iv) IPP's, and (v) Power tied up through competitive bidding, etc.. Accordingly, GUVNL on behalf of DISCOMs purchase power from various sources and allocates to DISCOM under approved BST Mechanism. Further, copy of DISCOM wise invoices issued by GUVNL for FY 2022-23 is enclosed herewith as Annexure-GU-03 (collectively).														
8.	Table 12	Provide the details of penalty paid (if any) in the form of Additional UI/ DSM Charges.														
	Compliance	Details of UI/DSM charges paid/received for FY 22-23 is attached herewith as Annexure A														
9.	Table 12	Provide the details of treatment of Rebate received for timely payment of Generating Companies and Transmission Service Providers														
	Compliance GUVNL	It is to clarify that GUVNL has earned total rebate of around Rs. 1064.38 Cr towards timely payment of generating companies and the same is passed on to DISCOMs while allocating power purchase costs as under: <table border="1" data-bbox="884 858 1794 1254" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: center;">Particulars</th> <th style="text-align: center;">Amount (Rs. Cr) for FY 2022-23</th> </tr> </thead> <tbody> <tr> <td>Power Purchase Cost of GUVNL as per books</td> <td style="text-align: right;">72,416</td> </tr> <tr> <td>Less: Revenue earned from sale of Power to others (GACL)</td> <td style="text-align: right;">20</td> </tr> <tr> <td>Power Purchase Cost for DISCOMs</td> <td style="text-align: right;">72,396</td> </tr> <tr> <td>Less: Rebate earned</td> <td style="text-align: right;">1,064</td> </tr> <tr> <td>Net Power Purchase Cost of GUVNL to be allocated to DISCOMs</td> <td style="text-align: right;">71,331</td> </tr> <tr> <td>Actual Power Purchase Cost allocated to DISCOMs</td> <td style="text-align: right;">68,191</td> </tr> </tbody> </table>	Particulars	Amount (Rs. Cr) for FY 2022-23	Power Purchase Cost of GUVNL as per books	72,416	Less: Revenue earned from sale of Power to others (GACL)	20	Power Purchase Cost for DISCOMs	72,396	Less: Rebate earned	1,064	Net Power Purchase Cost of GUVNL to be allocated to DISCOMs	71,331	Actual Power Purchase Cost allocated to DISCOMs	68,191
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Actual Power Purchase Cost allocated to DISCOMs	68,191															
10.	Table 12	The Petitioner is required to provide the details of Banking of Power (if any), details with time frame.														
	Compliance	No power banking / swapping arrangements has been executed by GUVNL / DISCOMs during FY 2022-23 with other entities.														

11.	Table 12	The Petitioner is required to provide the details of FPPPA filings and associated calculations.																																																																																											
	Compliance	The copy of FPPPA filings of Q1, Q2, Q3 and Q4 of FY 2022-23 submitted before Hon'ble Commission from time to time along with detailed computation is annexed herewith as Annexure-GU-04 (collectively) .																																																																																											
12.	Table 12	Detailed justification for huge deviation from power purchase cost approved by the commission and actual power cost claimed by the petitioner.																																																																																											
	Compliance	<p>It is to humbly submit that the variation in the approved and the actual power purchase cost is on account of following reasons:</p> <p>The actual sales quantum for FY 2022-23 was 1,02,645 MUs as against approved quantum of 91972 Mus on account of which the actual energy requirement for FY 22-23 was 1,20,439 MUs as against approved energy requirement of 1,07,834 Mus. Moreover, the rise in power purchase costs is attributable to unprecedented rise in coal and gas prices at international level, change in generation quantum by the different generators based on their actual availability etc. resulted in increase in overall power purchase cost.</p>																																																																																											
13.	Table 12	Net Power Purchase cost claimed in the Petition is Rs. 23,160.58 Cr, whereas Power Purchase cost in Audited Accounts is Rs. 22,406.63 Cr. Provide justification for the same																																																																																											
	Compliance	<p>In this regard, it is to state that as submitted above, the net claim of Rs. 2,468.85 Cr (i.e. Rs. 2,764.35 Cr – Rs. 295.51 Cr) from provisions has been made under power purchase expense and the same is also submitted in Table-11 of the Petition. Further, in case of PGVCL, expenditure towards RE attribute being Rs. 1.66 Cr is not claimed inadvertently in power purchase expense and the same may be allowed by Commission. The DISCOM wise power purchase expenditure is summarised as under:</p> <table border="1" data-bbox="739 842 1937 1394"> <thead> <tr> <th colspan="7">Details of Power Purchase Expenditure for FY 2022-23 (Rs. Cr)</th> </tr> <tr> <th>Sr. No.</th> <th>Particulars</th> <th>DGVCL</th> <th>MGVCL</th> <th>UGVCL</th> <th>PGVCL</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Purchase from GUVNL</td> <td>20422</td> <td>8356</td> <td>17157</td> <td>22255</td> <td>68190</td> </tr> <tr> <td>2</td> <td>Purchase from Wind</td> <td>9</td> <td>6</td> <td>9</td> <td>19</td> <td>43</td> </tr> <tr> <td>3</td> <td>Purchase from Solar</td> <td>26</td> <td>45</td> <td>91</td> <td>123</td> <td>284</td> </tr> <tr> <td>4</td> <td>Purchase from Hydel</td> <td>0</td> <td>0</td> <td>0</td> <td>3</td> <td>3</td> </tr> <tr> <td>5</td> <td>RE attribute</td> <td>2</td> <td>1</td> <td>2</td> <td>2</td> <td>7</td> </tr> <tr> <td>6</td> <td>DSM charges / (income)</td> <td>114</td> <td>(138)</td> <td>(331)</td> <td>(56)</td> <td>(411)</td> </tr> <tr> <td>7</td> <td>SLDC charges</td> <td>3</td> <td>1</td> <td>4</td> <td>4</td> <td>13</td> </tr> <tr> <td>8</td> <td>Cost of Power Purchase</td> <td>20576</td> <td>8271</td> <td>16931</td> <td>22351</td> <td>68130</td> </tr> <tr> <td>9</td> <td>Less: Provision made during year i.e. FY 22-23</td> <td>89</td> <td>36</td> <td>73</td> <td>97</td> <td>295.506</td> </tr> <tr> <td>10</td> <td>Add: Past year provisions paid/utilised towards power purchase expenditure</td> <td>835</td> <td>336</td> <td>687</td> <td>907</td> <td>2764.35</td> </tr> <tr> <td>11</td> <td>Total Power Purchase Cost</td> <td>21322</td> <td>8571</td> <td>17545</td> <td>23161</td> <td>70599</td> </tr> </tbody> </table>	Details of Power Purchase Expenditure for FY 2022-23 (Rs. Cr)							Sr. No.	Particulars	DGVCL	MGVCL	UGVCL	PGVCL	Total	1	Purchase from GUVNL	20422	8356	17157	22255	68190	2	Purchase from Wind	9	6	9	19	43	3	Purchase from Solar	26	45	91	123	284	4	Purchase from Hydel	0	0	0	3	3	5	RE attribute	2	1	2	2	7	6	DSM charges / (income)	114	(138)	(331)	(56)	(411)	7	SLDC charges	3	1	4	4	13	8	Cost of Power Purchase	20576	8271	16931	22351	68130	9	Less: Provision made during year i.e. FY 22-23	89	36	73	97	295.506	10	Add: Past year provisions paid/utilised towards power purchase expenditure	835	336	687	907	2764.35	11	Total Power Purchase Cost	21322	8571	17545	23161	70599
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14.	Table 15	Justification for deviation in capital expenditure in Normal development scheme for FY 2022-23. Provide Project wise details of Capital expenditure in FY 2022-23																					
	Compliance	In this regard, it is to state that under Normal Development scheme, the work related to new connections, shifting of network and extension / modification of existing connection etc. is included and at the time of Tariff petition filing, it is estimated based on the historical trends and the estimated no. of connections. Further, DISCOMs are obligated to supply / cater the requirement of existing as well as new applicants / consumers under Universal Supply Obligation (USO). Accordingly, the CAPEX under ND scheme has increased as per the actual works and quantum undertaken by DISCOMs.																					
15.	Table 16	Provide Project wise details of capitalization details for FY 2022-23. Also, Provide decapitalization details for FY 2022-23																					
	Compliance	Head wise details of de-capitalization is annexed as Annexure B																					
16.	Table 16	The Petitioner is requested to submit the details of scheme-wise breakup of actual capitalization with details of opening CWIP as on 1st April, 2022 and Closing CWIP as on 31st March, 2023 along with the source of funding's.																					
	Compliance	In this regard, it is to state that many of the Government schemes are being funded through Central or State Government Grants or share capital from the State Government etc. Further, for the Normal Development works for releasing new connections works etc., the part is being funded through consumer contribution and remaining through internal resources including debt finance. It is not possible to assign the exact fund allocation to individual projects, the overall funding mechanism is being provided in the Tariff Petition. The details of Opening and closing CWIP is attached herewith Annexure C																					
17.	Table 17	The Petitioner has claimed Rs. 1,150.08 Cr as employee cost whereas in the Audited Annual Accounts, the employee benefit expense is Rs. 980.09 Cr for FY 2022-23. Please provide the justification for the same																					
	Compliance	In this regard, the details being considered under employee costs are shown in Table below <table border="1" data-bbox="712 1058 1966 1345"> <thead> <tr> <th>Heads</th> <th>Amount (Rs. Cr)</th> <th>Rationale</th> </tr> </thead> <tbody> <tr> <td>Salaries</td> <td>1,004.49</td> <td>As per P&L Statement (Note 32)</td> </tr> <tr> <td>Arrears for 7th Pay Commission (Actual Paid)</td> <td>21.46</td> <td>These arrears have been disbursed to employees as a part of 7th Pay revision</td> </tr> <tr> <td>Staff Welfare Expenses.</td> <td>11.28</td> <td>As per P&L Statement (Note 32)</td> </tr> <tr> <td>Provident Fund Contribution</td> <td>122.90</td> <td>As per P&L Statement (Note 32)</td> </tr> <tr> <td>Less OCI</td> <td>(10.05)</td> <td>There has been a loss registered against Re-measurement of the defined benefit plans as per P&L Statement</td> </tr> <tr> <td>Total</td> <td>1,150.08</td> <td></td> </tr> </tbody> </table>	Heads	Amount (Rs. Cr)	Rationale	Salaries	1,004.49	As per P&L Statement (Note 32)	Arrears for 7th Pay Commission (Actual Paid)	21.46	These arrears have been disbursed to employees as a part of 7th Pay revision	Staff Welfare Expenses.	11.28	As per P&L Statement (Note 32)	Provident Fund Contribution	122.90	As per P&L Statement (Note 32)	Less OCI	(10.05)	There has been a loss registered against Re-measurement of the defined benefit plans as per P&L Statement	Total	1,150.08	
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Total	1,150.08																						

		<p>It is submitted that Discom has claimed actual payment made of Rs. 21.46 Cr towards wage revision arrears as part of the actual employee expenditure in FY 2022-23. This expenditure has been paid against provisions made in the past under the employee expenses and which were disallowed by the hon'ble Commission in the past orders. Summary of these provisions made in the past and the actual payment against these provisions is given in the table below</p> <table border="1"> <thead> <tr> <th>Sr. No.</th> <th>Year</th> <th>Provision (in Rs.)</th> <th>Payment of Arrears (in Rs.)</th> <th>Closing Balance (in Rs.)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>2015-16</td> <td>29,76,81,450</td> <td>-</td> <td></td> </tr> <tr> <td>2</td> <td>2016-17</td> <td>1,26,95,70,686</td> <td>-</td> <td></td> </tr> <tr> <td>3</td> <td>2017-18</td> <td>86,62,06,806</td> <td>-</td> <td></td> </tr> <tr> <td>4</td> <td>2018-19</td> <td>66,89,19,039</td> <td>1,19,51,69,721</td> <td></td> </tr> <tr> <td>5</td> <td>2019-20</td> <td>68,82,05,115</td> <td>-</td> <td></td> </tr> <tr> <td>6</td> <td>2020-21</td> <td>53,50,58,025</td> <td>-</td> <td></td> </tr> <tr> <td>7</td> <td>2021-22</td> <td>28,87,11,016</td> <td>1,62,48,48,833</td> <td></td> </tr> <tr> <td>8</td> <td>2022-23</td> <td></td> <td>21,45,81,569</td> <td></td> </tr> <tr> <td></td> <td>Total</td> <td>4,61,43,52,137</td> <td>3,03,46,00,123</td> <td>1,57,97,52,014</td> </tr> </tbody> </table>	Sr. No.	Year	Provision (in Rs.)	Payment of Arrears (in Rs.)	Closing Balance (in Rs.)	1	2015-16	29,76,81,450	-		2	2016-17	1,26,95,70,686	-		3	2017-18	86,62,06,806	-		4	2018-19	66,89,19,039	1,19,51,69,721		5	2019-20	68,82,05,115	-		6	2020-21	53,50,58,025	-		7	2021-22	28,87,11,016	1,62,48,48,833		8	2022-23		21,45,81,569			Total	4,61,43,52,137	3,03,46,00,123	1,57,97,52,014
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18.	Table 19	Please provide justification for deviation in A&G expenses for FY 2022-23. Also, in form 3.3 of A&G expenses, the petitioner has incurred cost of Rs. 101.96 Cr against conveyance and travel. Provide the justification for the same.																																																		
	Compliance	<p>As regard to the increase in conveyance expenses, it is to submit that the DISCOMs carry out implementation of different schemes notified by Central / State Government besides its performance related activities and universal supply obligation. This has resulted into the increase in overall admin and general expenses including conveyance and travelling expenses.</p> <p>Details of A&G Expenses attributable to conveyance is annexed as Annexure-D.</p>																																																		
19.	Table 19	In form 3.3 A&G expenses the petitioner has claimed expenditure of Rs. 56.33 Cr against other A&G expenses. Provide the details of the breakup of the same.																																																		
	Compliance	Details of Other A&G expenses is annexed as Annexure-E																																																		
20.	Depreciation	Regarding the computation of depreciation, Petitioner should clarify whether the depreciation on assets, which are already depreciated up to 90% of GFA has not been considered supported by CA certificate.																																																		
	Compliance	PGVCL has not considered depreciation on assets which are already depreciated up to 90% of GFA. For CA Certificate the C&AG audit report is attached herewith as Annexure-F .																																																		

21.	Interest and Finance Charges	Petitioner should provide detailed computation of weighted average interest rate on actual loan portfolio FY 2022-23 along with the supporting loan documents for each loan portfolio, date of repayment during the year, if any, in accordance with the GERC MYT Regulations, 2016, as per the attached format.												
	Compliance	Details of computation of weighted average interest rate on actual loan portfolio FY 2022-23 is annexed as Annexure-G .												
22.	Capitalisation	The Petitioner is required to clarify about conversion of loans and interests into grant during FY 2022-23, if any and treatment of the same given to various elements of ARR. The said details of conversion of loan and interest into grant should be given year wise showing i) name of scheme, (ii) amount of loan received, (iii) rate of interest, (iv) interest amount claimed along with year in which claimed in the trued up ARR, (v) date on which loan converted into grant, (vi) total amount of interest converted into grant along with year in which such conversion took place supported by copy of approval letter by respective authority.												
	Compliance	In this regards it is submitted that no such Grant received during FY 2022-23.												
23.	Subsidy	The Petitioner is required to submit the statement of subsidy claimed, received from State Government from FY 2015-16 onwards and treatment given to subsidy received in respective true up year.												
	Compliance	The State Government is providing Tariff subsidy to DISCOMs through GUVNL. The year wise details of subsidy claimed, received details for FY 2015-16 and onwards and treatment given is annexed herewith as Annexure-GU-05 .												
24.	Income Tax	Submit Tax Challans. Also clarify about whether any income tax refund was received for FY 2022-23.												
	Compliance	Tax challans attached herewith as Annexure H . Remaining tax liability is set-off against the TDS amount deducted by the taxpayers. There is No refund received during FY 2022-23.												
25.	Power Purchase Cost	Reconciliation of PP Cost with FPPPA submission and Additional Surcharges submissions and reasons for deviations in variable cost and fixed cost appearing in all three submissions for all the sources												
	Compliance	<p>In this regard, it is submitted that</p> <p>(i) Power Purchase cost as per FPPPA submission vis-à-vis Annual Account of FY 2022-23: Power Purchase Cost as per FPPPA submission vis-à-vis claimed in the Petition, it is to state that total power purchase cost as per the FPPPA submissions for FY 2022-23 is as under:</p> <table border="1"> <thead> <tr> <th>Quarter</th> <th>Q1</th> <th>Q2</th> <th>Q3</th> <th>Q4</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Amount (Rs. Cr)</td> <td>18,764</td> <td>16,125</td> <td>18,498</td> <td>18,115</td> <td>71,502</td> </tr> </tbody> </table> <p>In this regard, it is to state that as per the directive of Hon'ble Commission, the claim in FPPPA submission is based on actual payment made during respective quarter which do not include un-discharged liability / provisions etc. but includes the amount which is paid during the quarter for which liability is accrued and booked as expenditure in the Books of previous year. Whereas Annual Accounts are prepared on accrual basis as per the Indian Accounting Standards (IND-AS) which includes undischarged liabilities / provisions on account of matters pending in various courts and estimated as per</p>	Quarter	Q1	Q2	Q3	Q4	Total	Amount (Rs. Cr)	18,764	16,125	18,498	18,115	71,502
Quarter	Q1	Q2	Q3	Q4	Total									
Amount (Rs. Cr)	18,764	16,125	18,498	18,115	71,502									

the orders of competent courts / best assessment basis. Further, there are other reasons for variation in power purchase cost as per FPPPA submissions and power Purchase cost as per Books such as (i) amount claimed / credited in FPPPA on actual payment basis but part of previous year account (ii) increase / decrease in the final bill amount after FPPPA submissions (iii) amount accounted in FY 2022-23 but payment is made in subsequent period and therefore not part of FPPPA of FY 2022-23 etc.

The reconciliation of power purchase cost claimed in the FPPPA submissions vis-à-vis Books of FY 2022-23 is as under:

Particulars	Amount in (Rs. Crores)
Power Purchase Cost as per FPPPA	71,502
Less: GUVNL cost & SLDC charges (being not part of Book cost)	507
Add: Provisions made in Books	296
Net Adjustments towards:	
Less: amount claimed / credited in FPPPA on actual payment basis but part of previous year books	223
Add: increase / decrease in the final bill amount paid & booked in Annual Accounts after FPPPA submission for respective quarter	1,348
Total	72,416
Power Purchase cost as per Books	72,416

(II) Fixed cost as per Additional Surcharge submissions vis-à-vis fixed cost in the books of FY 2022-23:

As regard to fixed power purchase cost as per Additional Surcharge submission vis-à-vis books, it is to clarify that similar to FPPPA submission, in respect of additional surcharge, the power purchase cost (fixed cost) is claimed on actual payment basis without considering provisions made in the books but including actual payment made towards previous years provisions etc. The reconciliation of power purchase cost (fixed cost) as per books viz-a-viz additional surcharge submission is as under:

Particulars	Amount (Rs. Crores)
Fixed cost as per Additional Surcharge submission	14,867
Add: Provisions made in books towards Fixed cost (not claimed in Additional Surcharge submission)	90
Add: Transmission cost provided in books (not part of AS submission)	8,101

		<p>Add: Net adjustments towards: (i) amount claimed / credited in AS being part of previous year books (ii) increase / decrease in the final bill amount after AS submission (iii) Provisions made in FY 2022-23 subsequent to AS submission</p> <table border="1"> <tr> <td>Total</td> <td>22,946</td> </tr> <tr> <td>Fixed cost as per Petition</td> <td>22,946</td> </tr> </table>	Total	22,946	Fixed cost as per Petition	22,946	-111												
Total	22,946																		
Fixed cost as per Petition	22,946																		
26.	Annual Accounts	Please submit CAG Certificate in respect to Annual Accounts for FY 2022-23																	
	Compliance	CAG certificate is attached herewith as Annexure F .																	
27.	Incentive	Please provide details about performance linked incentive received in respect to MNRE Guidelines No. 318/331/2017- Grid Connected Rooftop dated 20.08.2019 and treatment given in the respective truing up petitions.																	
	Compliance	<p>The details of performance linked incentive received in respect to MNRE Guidelines No. 318/331/2017 dated 20.08.2019- Grid Connected solar roof top plants are as under. However, the performance linked incentive was booked and shown as Misc. Income under the head of " Other Income".</p> <table border="1"> <thead> <tr> <th>SR.NO.</th> <th>Sanction No. and Date</th> <th>Date of GIA Received</th> <th>Incentive Amt. (in Rs)</th> <th>Date of Receipt</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>318/64/2021-Grid Connected Rooftop/ Dtd.14.06.2022</td> <td>30.06.2022</td> <td>40,08,78,324</td> <td>30.06.2022</td> </tr> <tr> <td>2</td> <td>318/51/2022-Grid Connected Rooftop/ Dtd.29.12.2022</td> <td>21.01.2023</td> <td>47,39,43,600</td> <td>21.01.2023</td> </tr> </tbody> </table> <p>The same is reported as Miscellaneous Income under the note of Other Income in financial statements. Further same is considered as Non-Tariff income in the current petition</p>			SR.NO.	Sanction No. and Date	Date of GIA Received	Incentive Amt. (in Rs)	Date of Receipt	1	318/64/2021-Grid Connected Rooftop/ Dtd.14.06.2022	30.06.2022	40,08,78,324	30.06.2022	2	318/51/2022-Grid Connected Rooftop/ Dtd.29.12.2022	21.01.2023	47,39,43,600	21.01.2023
SR.NO.	Sanction No. and Date	Date of GIA Received	Incentive Amt. (in Rs)	Date of Receipt															
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2	318/51/2022-Grid Connected Rooftop/ Dtd.29.12.2022	21.01.2023	47,39,43,600	21.01.2023															
28.	Incentive	Please provide details about performance-based incentive received in respect to GoG G. R. No. SLR/11/2020/Mini-185/B1 dated 11/12/2020 and treatment given to the same in the respective truing up petitions.																	
	Compliance	No any Incentive Received for FY 2022-23.																	

29.	Tariff proposal	As per Para 6.3 (b) of the Petition, ToD tariff for LTMD consumers is proposed to be introduced. However, as per the proposed tariff schedule attached with the petition at para 5.3, it is mentioned that concession to be provided for consumption during the specified hours. The Petitioner is required to explain the discrepancies in the submissions.
	Compliance	In this regard, it is to state that Petitioner has proposed to levy Time of Day (ToD) tariff for LTMD consumers for FY 2024-25. However, inadvertently at para 5.3, the word “concession” has been mentioned under the head Time of Use charges in the tariff schedule. Hon’ble Commission is humbly requested to omit/delete the word “concession” for avoiding ambiguity in the matter.
30.	Tariff proposal	As per Para 6.3 (b) of the Petition, ToD tariff for LTMD consumers (consumers above 40 kW is proposed to be introduced. However, as per the tariff schedule attached with the petition, it is mentioned at para 4 that consumer under non RGP category may opt to be charged as LTMD tariff category. The petitioner is required to clarify whether non-RGP category consumer (i.e. consumer below 40 kW) opting to be charged as LTMD tariff category will also require to pay ToU charge?
	Compliance GUVNL	In this regard, it is to submit that LTMD tariff category is demand based category and Non-RGP category consumers are eligible to opt and billed as per demand based LTMD tariff category. Accordingly, the consumers to be billed under the LTMD tariff category shall require to pay, all charges as per tariff schedule applicable for LTMD category shall be applicable including Time of Use charges.
31.	Tariff proposal	The Petitioner is required to provide rational about removal of Green Power Tariff stipulations in the proposed tariff schedule.
	Compliance GUVNL	Pursuant to the Rules notified by Ministry of Power, Govt. of India vide notification dated 06.05.2022, DISCOMs had submitted methodology as per the directions from the Hon’ble Commission for determination of Green Tariff in the Tariff Petition for FY 2023-24 and accordingly, Hon’ble Commission has decided the premium on normal tariff for availing green power from DISCOMs. Accordingly, Hon’ble Commission may consider to take a suitable view in accordance with the prevailing rules.
32.	Revenue from existing tariff	Petitioner is required to give details of the revenue earned out of green tariff.
	Compliance	In this regard, it is humbly submitted that since Green Power tariff was introduced by Commission in FY 2023-24 and for PGVCL Rs 0.19 Cr revenue has been earned under Green Power Tariff during FY 2023-24 (upto December 2023).

33.	Revenue gap for FY 2024-25	As per Clause 28.1 of the GERC MYT Regulations, 2016, the Petitioner is required to file full details of his calculation for ARR and expected revenue from tariff and charges and details of revision in the tariff to meet out the gap. It is observed that while considering the revenue for FY 2024-25, the Petitioner has considered the revenue without incorporating effect of tariff revision proposed. The Petitioner is required to clarify on the same.
	Compliance	In this regard, it is humbly submitted that DISCOMs have filed calculation of ARR and expected revenue from tariff and charges as per the existing tariff schedule in accordance with MYT framework. Further, DISCOMs have also proposed the certain revisions and modifications in the tariff schedule, subject to approval of Hon'ble Commission. Since, it is difficult to estimate the impact of all changes proposed under the tariff schedule, DISCOMs have not submitted expected revenue from tariff and charges with proposed modifications.
34.		Petitioner is required to provide Power Purchase Model excel and MYT formats in excel:
	Compliance	The requisite details shall be submitted to Hon'ble Commission along with annexures of data gaps.