



PURVANCHAL VIDYUT VITARAN NIGAM LTD.  
PURVANCHAL VIDYUT BHAVAN,  
VIDYUT NAGAR, P.O.-D.L.W.,  
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CIN-U31200UP2003SGC027461

No. 5217

/PuVVNL/Commercial/FY2025-26/TVSDG1

Date: 20.06.2025

The Secretary,  
Uttar Pradesh Electricity Regulatory Commission  
Vibhuti Khand, Gomti Nagar  
Lucknow- 226010

**Sub:**TVS 1<sup>st</sup> Information Requirement/Discrepancies/Data Gaps in the Petition No. 2163 of 2024 dated 29th November, 2024 of True-Up (FY 2023-24), Annual Performance Review (FY 2024-25), Aggregate Revenue Requirement (FY 2025-26) of PuVVNL.

**Ref:**UPERC Letter No. UPERC/Secy/D(T)/2025-190 dated 09.05.2025.

Dear Sir,

This is with reference to your above-mentioned letter directing submission of replies to 1<sup>st</sup>TVS Information Requirement/Discrepancies/Data Gaps in the Petition No. 2163 of 2024 dated 29th November, 2024 of True-Up (FY 2023-24), Annual Performance Review (FY 2024-25), Aggregate Revenue Requirement (FY 2025-26) of PuVVNL, Varanasi.

The Licensee hereby submits the point-wise replies to the queries/information required by the Hon'ble Commission along with all the Annexures, wherever required. Some Annexures are very heavy and required huge quantum of papers for print outs. As such the same are enclosed in soft copies.

Enclosure as above. [06 (1+ 5 copies) + 1- CD (soft copies)]

Yours Sincerely,

(Shishir)  
**Director (Commercial)**

CC to:

1. Managing Director, PuVVNL.
2. Chief Engineer, RAU, UPPCL, Lucknow.

**Director (Commercial)**  
**PuVVNL - Varanasi**



**Reply to TVS Information Requirement / Discrepancies in the Petition No. 2163 -  
2024**

**Dated: -29<sup>th</sup> November, 2024**

**of**

**True-Up (FY 2023-24), Annual Performance Review (FY 2024-25), Aggregate Revenue  
Requirement (FY 2025-26) of PuVVNL**

1. Provide replies to all pending data deficiencies raised by the Commission.

**Response:** It is humbly submitted that discom has provided the replies of previous data deficiencies raised by the Hon'ble Commission.

2. Provide detailed computation of Distribution Losses Trajectory starting from True up year (FY 2023-24) to the end of the control period as per the UPERC (Multi Year Tariff for Distribution and Transmission) Regulations, 2025 as per the format P1\_DL.

**Response:** It is humbly submitted that petitioner has admitted its distribution loss trajectory starting from True up year (FY 2023-24) to the end of the control period as per the UPERC (Multi Year Tariff for Distribution and Transmission) Regulations, 2025 in latest petition submission dated 19.05.2025, reproduced below for kind consideration of the Commission:

Distribution Loss trajectory (%) of State Discoms							
DISCOM	FY 24 (Actual)	FY 25 (Prov)	FY 26 (Proj)	FY 27 (Proj)	FY 28 (Proj)	FY 29 (Proj)	FY 30 (Proj)
PuVVNL	17.33%	16.23%	16.23%	15.90%	15.58%	15.27%	14.97%

AT&C Loss trajectory (%) of State Discoms						
DISCOM	FY 25 (Prov)	FY 26 (Proj)	FY 27 (Proj)	FY 28 (Proj)	FY 29 (Proj)	FY 30 (Proj)
PuVVNL	36.08%	36.08%	33.27%	30.34%	27.28%	24.10%

Collection efficiency trajectory (%) of State Discoms						
DISCOM	FY 25 (Prov)	FY 26 (Proj)	FY 27 (Proj)	FY 28 (Proj)	FY 29 (Proj)	FY 30 (Proj)
PuVVNL	76.30%	76.30%	79.35%	82.52%	85.83%	89.26%

3. Recompute Energy Balance for FY 2024-25 & FY 2025-26 as per proposed interstate losses for FY 2024-25 and FY 2025-26.

**Response:** It is humbly submitted that the petitioner in its revised submission dated 19.05.2025 has submitted the Energy Balance for FY 2024-25 & 2025-26 as per proposed interstate losses as under:

ENERGY BALANCE PROPOSED FOR PuVVNL			
Particulars	FY 2024-25		FY 2025-26
	Approved in T.O. dt.10.10.2024	Claimed	Projected
Retail Sales	29,170.98	30,487.63	32,485.49
Distribution Losses	13.98%	16.23%	16.23%
Energy at Discom Periphery for Retail Sales	33,911.86	36,394.45	38,779.39
Intra-State Transmission Losses	3.18%	3.18%	3.18%

  
Director (Commercial)  
PuVVNL - Varanasi



Energy Available at State periphery for Transmission	35,025.67	37,589.81	40,053.07
Energy Purchase from Stations connected to Intra-State Transmission network (UPPTCL)	22,415.52	24,417.43	27,104.74
Energy Purchase from Stations connected to Inter-State Transmission network (PGCIL)	12,610.15	13,172.38	12,948.33
Inter-State Transmission Loss	3.77%	4.78%	3.72%
Net Energy Received from Stations connected to Inter-State Transmission network at UPPTCL Periphery (Ex-Bus)	13,104.30	13,833.22	13,449.03
<b>Power Purchase Required &amp; Billed Energy (MU) (Ex-Bus)</b>	<b>35,519.82</b>	<b>38,250.65</b>	<b>40,553.77</b>

4. Provide category-wise detailed break-up of revenue subsidy received from GoUP during FY 2023-24 & FY 2024-25. Further, for FY 2025-26, provide category-wise expected revenue subsidy receivable from GoUP.

**Response:** It is humbly submitted that break-up of revenue subsidy as captured in the Audited Balance Sheet during FY 2023-24 & FY 2024-25 is mentioned below:

Tariff Subsidy	FY 2023-24 Amount (in Rs. Crore)	FY 2024-25 Amount (in Rs. Crore)
Agriculture or RE Subsidy from Govt. of U.P.	513.4	643.51
Revenue Subsidy from Govt. of U.P.	3288.97	3966.12
Subsidy against Electricity Duty	615.01	697.13
Subsidy from Govt. against UPERC order	-59.01	0
<b>Total</b>	<b>4358.37</b>	<b>5306.76</b>

Further, it is submitted that regarding FY 2025-26, the expected revenue subsidy receivable from GoUP is under estimation and will be duly furnished as and when available with the licensee.

5. Submit category-wise billing determinants including revenue details for True up, APR, and ARR years regarding Distribution Franchisee M/s. Torrent Power Limited.

**Response:** It is submitted that the query does not pertain to PuVVNL.

6. Submit the rationale adopted to arrive at projected figures for billing determinants (along with revenue details) for FY 2025-26, as the 7-year CAGR was not considered.

**Response:** It is submitted that for projecting billing determinants and revenue for FY 2025-26 in the Annual Performance Review (APR), data up to March 2025 has been considered. While multiple CAGRs (7-year to 2-year) and year-on-year growth rates were analyzed for each sub-category, the 7-year CAGR alone was not adopted. This is because the period from 2020 to 2022 was significantly impacted by the COVID-19 pandemic, which introduced distortions in consumption patterns and consumer base. As a result, relying solely on CAGR during this period does not yield realistic projections.

A balanced approach has therefore been adopted, for projections where necessary and applying reasonable growth rates based on recent trends to arrive at more accurate and realistic billing determinants for FY 2025-26.

7. Resubmit the audited figures for Consumer Contribution for FY 2023-24, as the figures claimed in the petition do not match the audited Balance sheet (for DVVNL, MVVNL, PVVNL, and PuVVNL).

**Response:** It is respectfully submitted that the consumer contribution figure for PuVVNL was omitted in the formats due to linking error. The Hon'ble Commission is requested to kindly consider the value of consumer contribution as ₹201.01 crore as per Note-24 of the audited balance sheet of FY 2023-24.

8. Provide an appropriate reason for the consistently declining audited depreciation figures for PuVVNL over the past 3 years (FY 2023-24, FY 2022-23, and FY 2021-22).

**Response:** It is humbly submitted that the apparent decline in PuVVNL's audited depreciation over the past three years is mainly due to a one-time adjustment in FY 2022-23, where ₹165.63 crore related to asset impairment was incorrectly classified under depreciation instead of Repair and Maintenance (Note-24). Excluding this, the depreciation trend remains stable. The Petitioner has claimed depreciation as per MYT Regulations 2019, and this accounting issue does not affect the regulatory claim based on norms.

9. Provide an appropriate reason for the difference in energy sales (MUs), specifically for the domestic consumer category, as submitted in the petition versus the audited balance sheet for FY 2023-24 (e.g., PuVVNL's domestic sales: 14,813 MU in audited vs. 15,182 MU in petition).

**Response:** It is submitted that the domestic energy sales of 15,183 MU submitted in the petition are fully aligned with the audited financials of PuVVNL for FY 2023-24. This figure can be verified from the audited balance sheet with minor revision attached as **Annexure-1**, specifically from the Financial Statement of PuVVNL – Page No. 51, Table No. 7, titled "Consumer Category-wise Details of Sale (MU)", which clearly reflects the domestic sales as 15,183 MU.

10. Submit a detailed break-up of Rs. 398 Cr. claimed under the head "Any other charges" in the format F1\_PP\_Annual\_23\_24 of Power Purchase.

**Response:** It is submitted that the ₹398 crore under "Any Other Charges" in Format F1\_PP\_Annual\_23\_24 arises from the net impact of prior period expenses and receivables/credits.

• **Prior Period Expenses (AG Code 83.1):** ₹224.51 crore

• **Receivables/Credits:**

- o UI Charges: ₹9.01 crore
- o Reactive Charges: ₹3.49 crore
- o NEDA Subsidy: ₹174.30 crore
- o IREDA Subsidy: ₹10.01 crore
- o Rebate/Other Credit: ₹426.37 crore
- Total Deductions:** ₹623.18 crore



The difference of ₹623.18 crore – ₹224.51 crore = ₹398.67 crore accounts for the amount shown under “Any Other Charges.” The above break-up is also provided in the Format F3\_PP\_Monthly\_23-24\_True Up submitted under new MYT Formats.

11. Submit a detailed explanation of charges regarding Generation Based Incentive (GBI) of Rs. 12.24 per unit, which seems to be on the higher side.

**Response:** It is humbly submitted that the GBI is calculated as per the Hon'ble UPERC order dated 22.06.2010, which states GBI shall be equal to the difference between the tariff determined by the Central Electricity Regulatory Commission (CERC) and the base rate. The base rate is determined as per the provisions of Hon'ble UPERC order and the tariffs are given by CERC order dt. 09.11.2010. The relevant orders are attached as **Annexure-2**.

12. Submit a detailed explanation regarding generation sources NSM-II (thermal) and NSM-II (Solar) submitted in the format F1\_PP\_Annual\_23\_24 of Power Purchase.

**Response:** Detailed explanation regarding generation sources NSM-II (thermal) and NSM-II (Solar) is submitted as under:

A. NTPC has been identified by the Govt. of India as the nodal agency for purchase and sale of 33kV and above grid connected 'Solar PV' power under the "State Specific Bundling Scheme" under National Solar Mission by Ministry of Power (MoP). Government of India (GoI).

B. NTPC has also been authorized by MoP, GoI and under the provisions of the National Solar Mission Phase-II, Guidelines for selection of 3000 MW Grid connected Solar PV power project under Batch II to bundle the purchased Solar Power with unallocated quota from NTPC thermal power stations on 2:1 on MW basis as per allocations made by MoP, GoI.

C. NTPC has signed Power Purchase Agreements (PPAs) with Solar Power Developers assigned by parent Company Prayatna Developers Pvt. Ltd and Azure Power India Pvt. Ltd. (hereinafter referred to as "SPDs") for procurement of 50 MW (5X 10 MW) and 50 MW (5X 10 MW), Solar Power on a long term basis @ Rs.4.78/kWh respectively.

D. NTPC Vidyut Vyapar Nigam Limited (NVVN) in behalf of NTPC, will purchase Solar Power from SPDs and sell it to Discom after bundling it with the Thermal Power allocated by MoP GoI, for this purpose. Further on behalf of NTPC, NVVN will facilitate Daily Scheduling, Billing, Realization, Data Submission and other associated day to Day activities for fulfilling the obligations of NTPC as assigned in this agreement.

E. The agreed Contracted thermal power from different stations of NTPC for bundling shall be as per the allocation letter to be issued by MoP, GoI from time to time.

13. Submit a detailed explanation for submission of NTI figures under the head "Audited" for FY 2023-24, in the format F28\_NTI, which is not in line with the audited balance sheet.

**Response:** It is submitted that NTI figures under head "Audited" for FY 2023-24, in the format F28\_NTI is in line with the Audited Balance Sheet of discoms, the comparative is shown in below table for the reference of the Commission:

DISCOM	Audited	Audited as per(F28_NTI)	Remarks
PuVVNL	84.13	84.13	Note-20

14. Provide the reason for considering Rs. 126.94 Cr. (FY 2019-20) and Rs. 145.95 Cr. (FY 2020-21) for Employee expense and A&G calculations, as these figures do not match the audited balance sheets (for KESCO).

**Response:** It is submitted that the query does not pertain to PuVVNL.

15. Submit the reason for the negative sales figure under open access for FY 2023-24.

**Response:**It is submitted that the petitioner has claimedPurchase From Open Access (OA)under 'F3\_PP\_Monthly\_23-24\_True Up' the petitioner as 1,407.74 MU.

16. Provide a detailed break-up of CAPEX submissions pertaining to figures submitted under the head of "OTHERS" as per Regulation 32.6 of MYT Regulations 2025.

**Response:** It is humbly submitted that the break-up of CAPEX submissions pertaining to figures submitted under the head of "OTHERS" for the year FY 2024-25 has been provided under **Appendix-1**, the same has been escalated for the year FY 2025-26.

17. Provide component-wise break-up of CAPEX submitted under the head "RDSS."

**Response:** Break-up of Capex submitted under head "RDSS is attached as **Annexure-3** for kind consideration of the Commission.

18. Provide the break-up of smart metering expenses claimed under O&M expenses vis-à-vis smart metering under RDSS and other smart metering works.

**Response:** The break-up of smart metering expenses claimed under O&M expenses vis-à-vis smart metering under RDSS and other smart metering works is depicted below in the table for consideration of the Commission:

PuVVNL		(Rs. in Cr.)	
FY	EESL	RDSS	Total
2023-24	39.12	-	39.12
2024-25	39.12	31.10	70.22
2025-26	39.12	487.82	526.94

19. Submit under which head of O&M expenses of past years smart metering expenses have been included, along with the amount, and reconcile these with the smart metering expenses claimed in the control period covered under MYT Regulation, 2019.

**Response:** It is Submitted that the smart metering expenses incurred by the licensee have been classified under the Administrative & General (A&G) Expenses, specifically under the sub-head "Expenses incurred for Revenue Realization", as disclosed in Note-25 of the audited financial statements.

The details of actual smart metering-related payments made by the licensee from FY 2022-23 onwards are summarized below:



FY	Amounts (Rs. In Cr.)
2022-23	51.54
2023-24	22.49
2024-25	32.16
2025 till date	11.11
<b>Total</b>	<b>117.32</b>

**APPENDIX-1 (Question No. 16)**

<b>PURVANCHAL VIDYUT VITRAN NIGAM LIMITED</b> <b>BUSINESS PLAN 2024-25 SUMMARY</b>				
Sl. No.	Detail of Works	Unit	BP 24-25 Total	
			No. of Works	Amount (Rs in Cr)
1	New Work			
i	Construction of new 33/11 KV Sub-station	No.	23	146.63
ii	Construction work of 33 KV Lines and Bay	No.	115	171.03
iii	Capacity enhancement of 33/11 KV Sub-station	No.	161	130.8
iv	Construction and bifurcation of 11KV Lines	No.	469	146.78
V	Construction of 11/0.4 KV Sub-station	No.	2279	131.59
Vi	Capacity enhancement of 11/0.4 KV Sub-station	No.	6186	95.75
Vii	Capacity enhancement of 33/11 KV Sub-station (20 MVA)	No.	4	10.00
A	Sub-Total		-	832.59
2	Other Misc Work			
i	Protection and System Strengthening (VCB, LA, CR, Control Wiring, Damage AB Cable, Isolator etc)	No.	4300	307.49
ii	Replacement of New Transformer against Uneconomical Transformer	No.	1387	29.66
iii	IT work (New hardware- Desktop computers, Printer & UPS)	LS.	-	2.00
iv	Protection for Industrial Area	No.	249	19.79
V	Cable Route Tracker	No.	12	1.20
Vi	Thermovision Camera	No.	12	0.14
Vii	Partial Discharge Kit	No.	3	1.20
Viii	Hi Tech Lab	LS.	-	3.00
IX	LT Tailless Unit for Selected 63 KVA Transformers	LS.	-	10.50
X	Stores	LS.	-	4.17
B	Sub-Total		-	379.15
3	Civil Work			

i	Extension of 33/11 KV Sub-station Building (for Installation of switch gear) And other misc works like Repair of damaged Boundary walls, Workshop , Store Centers, & Office Buildings Etc.,	LS.	-	11.66
C	Sub-Total		-	11.66
4	Various works related to Workshops			
i	Supply of material for repairing of Distribution Transformers of various capacity in workshops and other work	LS.	-	72.75
ii	Expenses incurred on outsourced agencies engaged in repair work in various workshops	LS.	-	43.05
iii	Essential equipments for repair and quality check for establishment of New Transformer Workshops	LS.	-	1.15
iv	Refurbishment of Workshop shed	No.	4	1.99
D	Sub-Total		-	118.94
5	Metering Work			
i	Supply of Single Phase and Three Phase meters for replacement of damaged meters (After guarantee period)/Meters for Double metering (33 KV / 11 KV / CT / PT unit)Purchase and installation of Modem	No.	-	4.00
E	Sub-Total		-	4.00
6	Other capital nature work for which no budget is available in different heads			
i	Amount At the Discretion of MD PuVVNL			14.89
F	Sub-Total		-	14.89
7	Third Party inspection			
i	Testing of materials in CPRI/ERDA/NABL Aproved LAB & Liability of TPI	LS.	-	20.00
G	Sub-Total		-	20.00
H	Sub-Total of New Work (A) &Other MiSC Work 2(i)	No.	12,42 1	1140.08
I	Sub-Total of Other rest work (i.e 2. [ (ii to iii) & C to G])			201.15
	G. Total (H+I)			1381.23
<div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div style="text-align: center;"> <u>Director (Technical)</u>  <u>PuVVNL, Varanasi</u> </div> <div style="text-align: center;"> <u>Director</u>  <u>(Finance</u>  <u>1</u>  <u>PuVVNL,</u>  <u>Varanasi</u> </div> <div style="text-align: center;"> <u>Managing Director</u>  <u>PuVVNL, Varanasi</u> </div> </div>				

  
 Director (Commercial)  
 PuVVNL - Varanasi